



Contents

Section 1: Introduction

- Introduction

Section 2: If you want to erect a memorial in one of our cemeteries

- Requesting permission
- Dealing with unauthorised memorials
- Memorial permit application form
- Restrictions on memorial size and placement
- Fees
- Changes to memorials
- Maintaining your memorial

Section 3: Monumental sculptors wishing to work in our cemeteries

- Standards
- The Belfast Code of **Memorial Safe Working Practice Policy**
- Getting permission
- Carrying out preparation work
- Working hours
- Signing in process
- Insertion of dowels into memorials
- Working on multiple memorials
- Memorial remedial work
- Debris
- Memorial or headstone grave marking
- Re-erection and repair or inscriptions work – visitors' permit

Section 4: Memorial inspection programme

- Memorial Safety Inspection Programme
- Communication
- Memorials up to 2.5 metres high
- Memorials over 2.5 metres high
- In the case of a dispute
- Unsafe memorials
- Dealing with memorials that pose a significant or immediate risk

Monumental sculptors' registration form

Glossary of terms

Section 1: Introduction

Introduction

- 1.1 We, as the Burial Board for the city of Belfast, own and manage the following cemeteries, graveyards and burial grounds:
- Balmoral Cemetery
 - City Cemetery
 - Clifton Street Graveyard
 - Dundonald Cemetery
 - Friar's Bush Graveyard
 - Knockbreda Cemetery
 - Knock Burial Ground
 - Roselawn Cemetery
 - Shankill Graveyard

This list is subject to change and an up-to-date list can be found on our website, www.belfastcity.gov.uk/cemeteries

- 1.2 An important part of our responsibility is to make sure that our cemeteries, graveyards and burial grounds are safe places to work in and for the public to visit.
- 1.3 Historically, health and safety concerns in cemeteries focused on the risks arising from grave digging. However, in recent years there has been increasing attention on the stability of memorials and the risks these present to cemetery staff and visitors.
- 1.4 There have been a number of deaths nationally in recent years and many serious injuries caused by unsafe memorials. Where accidents have occurred, local authorities have been investigated by the Health and Safety Executive (HSE) and in some cases, improvement notices issued. In the most serious cases the HSE has threatened prosecution.
- 1.5 Responsibility for health and safety lies with us as the burial authority in control of the cemeteries. We are bound by the conditions of the Public Health (Ireland) Act 1878 Section 178, Burial Grounds Regulations (Northern Ireland) 1992 Part II No.5, Local Authorities Cemeteries Order 1977 and we have a legal duty under the Health and Safety at Work Order (NI) 1978, Management of Health and Safety at Work Regulations (NI) 2000, Occupiers Liability Act (NI) 1957 and Occupiers Liability (NI) Order 1987 to ensure that our burial grounds are safe places to work and visit. Managing memorial safety is therefore an essential part of controlling the risks to health and safety.
- 1.6 Whilst we have overall responsibility for the safety of our cemeteries, including risks from unstable memorials, we don't own the memorials. The owner of a memorial is the Deed Holder (grave owner of exclusive right of burial) or successor in title. This is the person responsible for maintaining the memorial so that it does not become a hazard. However, the current owner may not be identifiable as some records are extremely old and in many cases have not been updated by current relatives or family members.
- 1.7 This policy considers the historical problems we have faced in managing memorials and ways of dealing with unstable, hazardous and unauthorised memorials. The policy considers how the installation of new memorials should be managed and standards enforced so that we can be confident that memorials are authorised, will be more likely to remain safe and so that bereaved families receive a better product.
- 1.8 This policy sets out our approach to the safe erection and management of memorials in our cemeteries. We have based it on the British Standard 8415 and best practice and guidance

issued by the Institute of Cemetery and Crematorium Management (Management of Memorials 2012), the Ministry of Justice (Managing the safety of burial ground memorials; practical advice for dealing with unstable memorials January 2009), British Register of Accredited Memorial Masons (BRAMM) Guide and the National Association of Memorial Masons (NAMM) Code and Blue Book.

- 1.9 For general rules and guidance please refer to our booklet 'Guidance and regulations relating to burials and cemeteries.'

Section 2: If you want to erect a memorial in one of our cemeteries

Requesting permission

- 2.1 If you want to erect or have installed a memorial, such as a headstone on a grave, you must apply to do this. You must complete a 'Memorial permit application form', which is available from our Cemeteries and Crematorium Central Office.
- 2.2 You can only apply to put up a memorial on a grave which is subject to an exclusive right of burial if you are:
- (i) the owner of the exclusive right of burial, that is you own the grave, or
 - (ii) you can satisfy us that you are a relative of the person buried in the grave, or
 - (iii) you can satisfy us that you are acting at the request of a relative of the person buried, because it is not practical for that relative to trace the grave owner.
- 2.3 The monumental sculptor that you choose to carry out the work on your grave must currently be signed up to the **Belfast Code of Memorial Safe Working Practice Policy**. Fuller details of this policy are included in section 3 of this document. This policy promotes high standards and ensures that the monumental sculptor has the necessary skills to safely erect a headstone to the required standards.

Dealing with unauthorised memorials

- 2.4 Where we find a memorial to be unauthorised, that is it has been erected without permission or where no fees have been paid:
- i. We will send a letter to the grave owner at their last known address within 10 days of the unauthorised memorial being discovered. We will ask the grave owner to apply for retrospective permission and we will charge an administration fee for this process.
 - ii. If we don't receive a response, we will send another letter three months later.
 - iii. After a further three months have passed, if we still haven't received a response from the grave owner, our cemetery staff will remove the memorial.
 - iv. If the removed memorial is not claimed within six months, we will dispose of it.
 - v. If an unauthorised memorial is found to be unsafe, we will deal with through the process outlined in section 4 of this document.
- 2.5 If we haven't been able to contact the owner of a grave with an unauthorised memorial on it and someone wants to open the grave for a burial or to bury cremated remains, any outstanding fees owed to us must be paid before a burial can take place. It will then be up

to the grave owner or applicant to arrange to have the memorial put on the grave in accordance with the **Belfast Code of Memorial Safe Working Practice**.

- 2.6 The wording of inscriptions and the use of emblems on memorials is subject to strict conditions, in line with our legal duties of equality and promoting good relations. We will not permit any inscriptions that contain any sectarian, racist or inappropriate wording or imagery.
- 2.7 If an inscription or an emblem is made on a memorial and the grave owner or applicant has not asked for permission to do this, or has been refused permission to do this, we will remove the memorial and charge the grave owner or applicant a fee.

Memorial permit application form

- 2.8 The memorial permit application form must contain:
- a detailed plan of what is to be installed
 - the type of materials
 - the exact dimensions
 - the full inscription details - to include emblems / images
 - the applicant's name and address
 - the applicant's relationship to the grave owner or deceased person
- 2.9 We will consider the application and notify the applicant when it has been approved or declined. If an application is approved, all work must be completed within one year from the date of approval. If it is declined, we will provide a reason for this. If the applicant or the family wishes to contest this decision, they can appeal in writing to us detailing the nature of the appeal.
- 2.10 Once we have agreed an application, we will grant a numbered memorial permit specific to the application to carry out the work. The person carrying out the work must keep the permit with them at all times while they are working in our cemeteries.

Restrictions on memorial size and placement

- 2.11 We don't permit any memorial that restricts access to another grave.
- 2.12 All stone memorials must be placed on a solid foundation. We do not allow any memorial that is greater than 114.3cm (three feet nine inches) in height, except if the memorial is a cross or a figure. For crosses and figures, the maximum height that is permitted is 167.6cm (five feet six inches).
- 2.13 The height of memorials is measured from the highest point of the ground within the boundary of the individual grave site, to the top of the memorial.
- 2.14 Temporary wooden memorials must be made from a hardwood. They should be placed on a solid foundation and cannot be more than 76.2cm (two feet six inches) high.
- 2.15 In the lawn cemeteries (Roselawn and sections of City/Glenalina and Knockbreda), we only allow grave owners or next of kin to use one area at the head of the grave for placing memorials and any planting. This area must measure no more than 91.4cm by 91.4cm (three feet by three feet). If a memorial is put in place that exceeds this size, we will remove it and charge the grave owner or next of kin a fee. Surrounds are not allowed to be

placed in front of headstones on lawn graves and will be removed. If the removed memorial or surround is not claimed within 6 months, we will dispose of it.

- 2.16 We will remove any ornaments, bowls, vases and other items from the head of a lawn grave if they are put outside the permitted area of 91.4cm by 91.4cm (three feet by three feet). If we can, we will place them at the head of the grave. But if there is not enough space, we will remove them from the grave, as they obstruct our staff from cutting the grass.
- 2.17 We don't allow anyone to erect pillars, railings, fences, plinths, hoops, artificial grass, matting, surrounds, ropes, wind chimes, flag stones, concrete edging, kerbing, ornaments, flower pots, or other structures that enclose lawn graves. We will remove any item of this nature and will charge the grave owner or next of kin for undertaking this removal work.

Fees

- 2.18 We charge a fee to erect a memorial in our cemeteries, which must be paid before a memorial can be put up. We publish our fees online at www.belfastcity.gov.uk/cemeteries and they are reviewed each year.
- 2.19 We also charge a fee to have foundations laid for a memorial. Again, this must be paid in advance of the memorial being put up. Only council staff can lay memorial foundations, monumental sculptors can't install their own. In the newer sections of Roselawn Cemetery strip foundations have been pre-laid. You still have to pay the foundation fee in this case.

Changes to memorials

- 2.20 If a family wishes to add any inscriptions to a memorial at a later stage, they must seek approval for these in advance, from our Cemeteries and Crematorium Central Office. The same regulations around wording that are mentioned in 2.6 apply to new inscriptions.

Maintaining your memorial

- 2.21 It is the responsibility of the grave owner, or their family, to make sure that any memorial on a grave is properly maintained.
- 2.22 We regularly inspect memorials in our cemeteries to make sure that they are safe. There are more details on our inspection programme within Section 4 of this policy.
- 2.23 You must tell us if a grave owner's contact details have changed.

Section 3: Monumental sculptors wishing to work in our cemeteries

Standards

- 3.1 The standards referred to in this policy are:
- The British Standard 8415 being the primary standard (at the time of writing BS8415:2005+A2:2012 was the current standard as issued in April 2012)

- The British Register of Accredited Memorial Masons (BRAMM) Blue Book and National Association of Memorial Masons (NAMM) Code of Working Practice being the appropriate industry codes of practice that inform the monumental sculptor how to achieve the British Standard

3.2 All monumental sculptors who work in our cemeteries must, on a yearly basis, sign up to the **Belfast Code of Memorial Safe Working Practice Policy**. Any monumental sculptor who does not do this will not be allowed to work in any of our cemeteries. The year begins from the date that you first register.

The Belfast Code of Memorial Safe Working Practice Policy

3.3 The Belfast Code of Memorial Safe Working Practice Policy has been drawn up for the safe erection and management of memorials in our cemeteries. The purpose of this policy is to clarify our position in all areas of memorial management, from the application to erect a memorial to the required standard of erection in our cemeteries and the treatment of memorials that have been found to be unsafe or unauthorised.

Getting permission

3.4 You will find the process for obtaining permission to put up a memorial in Section 2.

Carrying out preparation work

- 3.5 All excavation work to lay foundations and prepare the ground will be done by council staff only.
- 3.6 Applicants must have paid fees up front before we will allow you to begin work in our cemeteries.

Working hours

3.7 Monumental sculptors are only allowed to carry out work in our cemetery grounds during the following hours:

Monday to Friday 8.30am – 4pm
 Saturday 8.30am – 12noon
 Sunday – no work is permitted

3.8 If we find that a monumental sculptor who has signed up to the **Belfast Code of Memorial Safe Working Practice Policy** is, or has been, working in our cemeteries outside of these hours, we will ask them to leave the cemetery. We may also consider refusing all further permission for them to undertake any other work in our cemeteries, as they have breached the terms and conditions of the **Belfast Code of Memorial Safe Working Practice Policy** which they signed up to.

Signing in process

- 3.9 Before starting any work in our cemeteries, all monumental sculptors must report to the cemetery office and show the original Memorial Permit. If the original permit is not produced, the sculptor will not be allowed to carry out any work on site.
- 3.10 Any person carrying out authorised work must keep their permit with them at all times while they are working in our cemeteries.
- 3.11 Once the original permit has been shown, the office administrator will give you a coloured bib, which you must wear while carrying out work relating to that particular permit. You must also sign the Monumental Register in the cemetery office.
- 3.12 If more than one person is working on any one memorial, each person must be signed in at the relevant cemetery office and issued with a coloured bib.
- 3.13 Once work has been completed for the day, you must sign out before you leave the cemetery and also return the coloured bib. If you have to come back on another day to complete the work, the same signing in and out process, and wearing of bibs, applies. The original Memorial Permit must be presented at each visit.
- 3.14 On final completion of the authorised work, the memorial sculptors must hand back the Memorial Permit to the cemetery office. We will then do a site check as soon as possible to make sure that the work completed is as per the agreed application, that is has been carried out by an authorised person, and that it has been put up properly in line with the **Belfast Code of Memorial Safe Working Practice Policy**.
- 3.15 If the above signing in and out process is not followed, we will ask the monumental sculptor to leave the cemetery and they will be refused all further permission to do work in our cemeteries.

Insertion of dowels into memorials

- 3.16 Stainless steel dowels must be inserted into memorials before they are brought to the cemetery for installation. We will check this as part of the sign in process.

Working on multiple memorials

- 3.17 If you are working on more than one memorial in the cemetery at any one time, you must sign in and out for each memorial and show the Memorial Permits for every job.

Memorial remedial work

- 3.18 Anyone can carry out basic cleaning, washing down and non-specialist cleaning of a memorial.

Debris

- 3.19 All monumental sculptors, anyone putting up a memorial, and anyone undertaking remedial work, must remove all debris remaining after a memorial is put in place. This must be done immediately, at their own expense and to the satisfaction of the cemetery manager.

- 3.20 They must also make good any damage caused to turf, shrubbery, adjacent graves, monuments or walkways. This must also be done immediately, at their own expense and to the satisfaction of the cemetery manager.

Memorial or headstone grave marking

- 3.21 The section and number of the grave and the name of the monumental sculptor must be engraved or marked in clear characters on the base of the memorial, monument or headstone being erected or re-erected on each grave.

Re-erection and repair or inscriptions work – Visitors' Permit

- 3.22 If you are re-erecting a previously authorised memorial or repairing lettering on an existing memorial you still have to sign in at the cemetery office. We will give you a visitor's permit and a coloured bib. When you have finished working, you must return these and sign out when you leave the cemetery.

Section 4: Memorial inspection programme

Memorial safety inspection programme

- 4.1 We want all our cemeteries to be welcoming and maintained to a high standard. We also take our responsibility for health and safety very seriously and must make sure that our cemeteries are safe for visitors and our staff.
- 4.2 We regularly inspect and test memorials in our cemeteries to make sure that they are safe. These inspections will be done as part of a rolling five-year programme, as recommended by the Health and Safety Executive. We will make safe any memorial that fails a safety test.
- 4.3 In the first instance, as a temporary measure we will stake and band any unsafe memorial. If for operational reasons we can't stake and band the memorial, other options to make the memorial safe will be to:
- lay the memorial flat
 - cordon off the area where the unsafe memorial is
 - put up a substantial barrier around the unsafe memorial, or
 - remove the memorial and store it for safe keeping.

Communication

- 4.4 At least 28 days before starting memorial safety inspections in any grave section, we, in accordance with the provision of Section 3 (1) of the Local Authorities Cemeteries Order 1977, will display a notice in an obvious place at the entrance to the cemetery and within the relevant grave section. We will also publish the notice in two successive weeks in local newspapers and place information onto our website and on social media. These notices will detail what is being done, when it will be done and how people can get further

information or raise objections. We will consider any objections to the memorial safety inspection.

- 4.5 All memorial safety inspections will be carried out by trained cemetery staff in accordance with BRAMM/NAMM guidelines.
- 4.6 We will keep a record of all memorial inspections and the inspection results will be available to view on request at the Cemeteries and Crematorium Central Office (you will need to give one week's notice for each request).

Memorials up to 2.5 metres high

- 4.7 For memorials up to 2.5 metres, inspections will include both a visual check and a hand test. The hand test will be used to check the stability of the memorial. Even where a visual check reveals no sign of defects, the hand test will be used to confirm that the memorial is stable.
- 4.8 The hand test will be carried out by standing to one side of the memorial and applying a firm but steady pressure in different directions. The hand test will be used to check if, or to what degree, the memorial is unstable.

Memorials over 2.5 metres high

- 4.9 For memorials over 2.5 metres, we will complete a visual check and risk assessments. If we think the memorial is unsafe, we will ask a memorial sculptor to carry out a more detailed assessment. Where the memorial sculptor does not have the experience needed, or where there remains uncertainty as to whether or not a memorial is safe, we will ask a specialised structural engineer or other suitably qualified professional to inspect the memorial thoroughly.

In the case of a dispute

- 4.10 We may also use mechanical force measuring equipment to test the stability of memorials. But we will only use this if the safety of a memorial is under dispute. In these circumstances, the equipment may be used to confirm that the memorial is unable to withstand a force of 25kg and is, therefore, an 'immediate danger'. Our staff will record the calibrated score of the mechanical tester.

Unsafe memorials

- 4.11 Whilst we have overall responsibility for the safety of our cemeteries, including risks from unstable memorials, we don't own the memorials. The owner of the memorial is the Deed Holder (grave owner of exclusive right of burial) or their successor in title. This is the person responsible for maintaining the memorial so that it does not become a hazard. However, we may not be able to identify a current grave owner, as some records are extremely old and in many cases have not been updated by relatives or family members.
- 4.12 Where we find a memorial to be unsafe:
 - i. We will send a letter to the grave owner at their last known address within 10 days of the inspection. This letter will inform the owner that their memorial has been found to be unsafe, that a temporary make safe repair has been carried out by

- cemetery staff, and details of the action needed to be taken by them to make the memorial permanently safe. We will also attach a notice to the unsafe memorial.
 - ii. If we don't receive a response, we will send another similar letter three months later.
 - iii. After a further three months have passed, if we still haven't received a response from the grave owner, our cemetery staff will take the necessary steps within the next 6 to 12 months to permanently make safe the memorial.

4.13 This action will involve:

In lawn cemeteries:

- Removing the memorial from its foundation and partially sinking it into the ground at the head of the grave – at least 25% of the memorial will be below ground, or
- In exceptional circumstance, we will remove the memorial.

In all other cemeteries:

- Lay the memorial flat on the grave – where there is a surround on the grave, or
- Remove the memorial – where the memorial is over 2.5m and we have found it to be structurally unsafe.

4.14 If we haven't been able to contact the owner of a grave with an unsafe memorial on it, or the grave owner is unwilling to make the permanent repair arrangements, and someone then wants to open the grave, any outstanding fees owed to us for making the memorial permanently safe must be paid before a burial can take place.

4.15 We will keep an up-to-date database of all grave owners and relative contact information. When you buy a new grave, we will ask you to keep us informed of any changes to your address.

Dealing with memorials that pose a significant or immediate risk

4.16 When a memorial poses a significant or immediate risk, such as likely collapse in a way that could lead to serious injury, we will take one or more of the following actions:

- (i) We will temporarily make safe the memorial using a staking and banding structural support method. We will put up a safety notice to tell people that the memorial is unsafe and the action to be taken by the grave owner or their heir(s) will be displayed on or near to the memorial.
- (ii) Fencing and cordoning off the unsafe memorials may be necessary under some circumstances. For example, for very large memorials or where a significant number of memorials are unsafe within a specific area.
- (iii) The memorial will be partially buried into the ground at the head of the grave.
- (iv) Memorials will be laid flat if there is no other practical way of making them safe, or where the grave owner or relative asks for this.

4.17 If we find that a large number of memorials aren't safe within a section of burial ground, we will fence off the whole area. We'll display signage to inform visitors of the danger and provide our contact details for further information.

4.18 Where a memorial is thought to have historical or social significance, we will do our best to consult with the relevant conservation or heritage association before any remedial works are carried out.



Monumental Sculptors' Registration Form

Please complete in **BLOCK** capitals

- 1. Full name
- 2. Company's name (if applicable).....
.....
- 3. Address.....
.....
.....
.....
- 4. Postcode.....
- 5. Tel number:
- 6. Mobile number:
- 7. Fax number:
- 8. Email address:
- 9. Website:

Declaration

I/we understand that in order for us to be allowed to work in any Belfast City Council cemetery that I/we must adhere at all times to the following:

- 1. I/we comply with the **Belfast Code of Memorial Safe Working Practice Policy**.
- 2. I/we confirm that all memorials erected and fitted will be in accordance with British Standard 8415 and that any repairs, remedial work on site etc will also be complaint with BS8415. This is the current standard as issued in April 2012.
- 3. Have a commitment to staff training in the erection and installation of memorials to British Standard 8415.
- 4. I/we will ensure that the relevant public liability insurance is in place and will provide a copy of the certificate to the Council.
- 5. I/we will ensure that any sub-contractors we use, also comply with all the above standards.

6. This is a yearly requirement and I/we must sign this declaration every year. I/we understand that failure to do so, may lead to me/us being prevented from working in any Belfast City Council cemetery.

Signature 1:Date:

Signature 2Date.....

Signature 3 Date:

Please return completed forms to:

Cemeteries and Crematorium Central Office
Ground Floor, Cecil Ward Building, 4-10 Linenhall Street,
Belfast, BT2 8BP.

Glossary of terms

Burial ground	An area set aside for interment (burial) such as a public cemetery, or an open or closed churchyard.
Burial authority	Organisation responsible for managing a burial ground.
Cemeteries and crematorium central office	Our main administrative office for bereavement services is currently based on the Ground Floor, Cecil Ward Building, 4-10 Linenhall Street, Belfast, BT2 8BP. Tel: 028 9027 0296. E: cemeteries@belfastcity.gov.uk
Cemetery	Means the 'active' burial grounds that we provide at Belfast City Cemetery and Glenalina section, Dundonald Cemetery, Knockbreda Cemetery, Roselawn Cemetery and the historical cemeteries that we manage at Balmoral Cemetery, Clifton Street Graveyard, Friars Bush Graveyard, Knock Burial Ground and Shankill Graveyard.
The council, or 'we'	Means Belfast City Council.
Dangerous memorial	A memorial that fails an inspection at less than 25kg. This means that it will move and continue to fall to the ground with the exertion of a force of 25kg or less.
Dowel	A stainless steel pin to align and to prevent movement between adjacent elements of a memorial.
Exclusive rights of burial	When you buy a grave, you are not actually purchasing land. What you buy is the right to bury someone in that grave space. This is known as the 'exclusive rights of burial'. Once you have bought these rights, you own the rights forever.
Force measuring equipment	Equipment used to measure the force applied to a memorial during the inspection process.
Foundation	A part of a structure in direct contact with and transmitting load to the supporting ground.
Grant of exclusive rights of burial	Also known as the grave paper, grave deeds or grave lease, this is the certificate that you get when you purchase the exclusive rights of burial.
Memorial	Means an object serving as a remembrance and, for the purposes of this policy, includes: <ul style="list-style-type: none"> • headstones, monuments, crosses, surrounds, urns, obelisks, columns or angels made of marble, granite or stone • wrought iron surrounds • cast iron grave markers or shields, and • wooden grave markers.
Memorial sculptor	Refers to a memorial mason, stonemason, sculptor or other craftsman who specialises in working with stone.
Lawn grave	Means a grave which is laid to lawn. A memorial can only be erected on the foundation at the head of the grave. Lawn graves can be found in the City/Glenalina cemeteries and at Roselawn Cemetery.
Policy document	Means this document which sets out the rules.
Stake and band	This is a temporary support system for memorials less than 2 metres high using vertical wooden stakes and plastic or metal binding wire.
Temporary support system	A system designed to reduce the risk of a memorial injuring anyone. Recommended only for use on a temporary basis.
Traditional grave	Means a grave which allows a head and surround on the grave such as those on the City and Dundonald cemeteries. There are no traditional graves at Roselawn Cemetery or in the Glenalina section of City Cemetery.