

Theme	Evidence	Emerging Recommendation?
<b>Scope of Review</b>	<p><b>Main Aims/Issues</b></p> <ul style="list-style-type: none"> <li>• Understand the current policy around grave personalisation, maintenance of cemeteries and access requirements for such sites.</li> <li>• Ascertain how the Council communicates with bereaved families in terms of current policy, and how it manages complaints.</li> <li>• Establish how effective the current policy is and determine if any amendments are required.</li> </ul> <p><b>Key Lines of Enquiry</b></p> <ul style="list-style-type: none"> <li>• What is the current Council policy regarding the management of memorials, and what rules are in place in relation to enforcement of unauthorised personalisation?</li> <li>• How was the current policy initially publicised and how does the Council communicate with bereaved families in terms of its content?</li> <li>• What are the key issues regarding the maintenance of the Borough's cemeteries?</li> <li>• How effective is the current policy? What are the key issues/concerns being raised and are these pertinent to specific geographical locations?</li> <li>• How does the Council deal with complaints in relation to unauthorised memorialisation and its impact on maintenance, access and other cemetery visitors?</li> <li>• Is there a need for changes to the current policy, and if so, what are the identified options?</li> </ul>	
<b>Background</b>	<p>Stockton Council ceased approval of fixed, permanent kerb-sets on all graves in 1969 following the adoption of the then much preferred lawn graves, where no items were permitted to be placed on the actual grassed part of the grave. Approximately 15 years ago, however, the Council recognised that some families needed to tend and care for their family graves by the placing of personal items, which reflected the personality and character of their loved ones.</p> <p>The Council also acknowledged and fully understood its duties under health and safety legislation to ensure that neither its own employees, nor the public, were exposed to risk from potentially dangerous memorials, when visiting the Borough's cemeteries and closed churchyards.</p> <p>In 2007, the Environment and Regeneration Select Committee gave detailed consideration to the future development of the Borough's cemeteries and the management of memorials, taking into account a wide range of issues and relevant information. Consequently, a number of recommendations were made, and for the purposes of</p>	

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	<p>this review, the most pertinent of these were:</p> <ul style="list-style-type: none"> <li>• Memorial masons should be required to attain professional accreditation and comply with more stringent Council controls;</li> <li>• To allow an area, at the head of the grave (approx. 25% of the total grave space), to be used for personalisation (implemented in April 2010);</li> <li>• To enforce the removal of unauthorised items placed on graves, following an appropriate period of notice to the grave owner(s) (person/s who is granted the Exclusive Right of Burial &amp; Right to Erect a Memorial);</li> <li>• To employ an additional member of staff to control the activities of memorial masons within the cemeteries and to deal with enforcement issues (appointed September 2009);</li> <li>• To carry out an extensive publicity campaign to raise awareness of these new Council policies (commenced October 2008 – ongoing).</li> </ul> <p>The new policy was implemented in a sensitive way over a five year period. Since the introduction of Council policy, however, it has yet to be assessed/scrutinised for how it is being managed, how it is being received by bereaved families, visitors and cemetery users and whether any amendments or additional choices are required to meet with public opinion.</p> <p>Whilst the inspection and safety of memorials and control measures for memorial masons within cemeteries has greatly improved since the introduction of the Council policy, criticism of maintenance and access (particularly for the excavation of graves), together with the Council’s approach to the ‘light touch’ enforcement of non-compliance cases to the Grave Personalisation Policy, both for and against, is still being received. Bereaved families, particularly recently bereaved, can become extremely distressed and emotional when they are unable (or feel they are unable) to personalise and memorialise their family grave in their own special way. Likewise, those families who have chosen a lawn grave and whose preference is to have an orderly, tidy and well-maintained grave for their loved one feel this is jeopardised and penalised by the fact that the Council is not fully enforcing the policy.</p> <p>To assist Committee Members in their understanding of the key findings and recommendations from the previous 2007 review, a copy of the final report was provided for background reading, along with the Institute of Cemetery and Crematorium Management (ICCM) ‘Management of Memorials’ (May 2012) document.</p>	
<b>Current Management of Memorial Masons</b>	<p>In response to the 2007 recommendations, memorial masons now:</p> <ul style="list-style-type: none"> <li>• Register with either the British Register of Accredited Memorial Masons (BRAMM) or the National Association of Memorial Masons (NAMM) and hold a valid licence to fix;</li> <li>• Fully adhere to the provisions of our memorial application process;</li> </ul>	

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	<ul style="list-style-type: none"> <li>• Provide the Council with copies of risk assessments, current health and safety policies and evidence of public liability insurance cover;</li> <li>• Arrange appointments for all memorial removals and installations;</li> <li>• Issue a Certificate of Compliance to the grave-owner, following installation of the memorial.</li> </ul> <p>To manage these new procedures, in 2016, the Council appointed a Cemeteries Superintendent, whose duties include:</p> <ul style="list-style-type: none"> <li>• Checking each written memorial application for compliance;</li> <li>• Attending with masons to oversee all memorial installations and removals;</li> <li>• Receiving the mason's Permit to Work (which acts as the mason's 30-year assurance of compliance and guarantee of stability, and also serves as the Council's guarantee);</li> <li>• Carrying out an inspection for stability 28 days after installation of each memorial;</li> <li>• Instigating disciplinary action against masons when necessary (depending on the nature of the offence, they could ultimately be banned from working in the Borough's cemeteries for an initial six months, and could be reported to BRAMM/NAMM (regulatory bodies) – it was noted that a number of masons have warnings on their file);</li> <li>• Working in partnership with the Asset Management Team in the implementation of their rolling memorial inspection programme.</li> </ul> <p>A process map for the installation of memorials was provided, and it was noted that since these new procedures have been adopted, they have been very successful, and have afforded complete oversight of the safe installation of headstones throughout the Borough's cemeteries.</p> <p>The issue of unauthorised professionally-fixed kerbs was highlighted, particularly the difficulties in identifying who is responsible for installing them – the masons doing this work do not put their name on the kerb, making it impossible to trace. Members queried whether receipts given to families for any such work undertaken could be requested, but were informed that families have previously been reluctant to say who they have used if an unauthorised kerb has been installed on their behalf.</p>	
<b>Current Grave Personalisation Policy (GPP)</b>	Grave personalisation is often a controversial subject. Many families do find comfort in tending and tidying a grave, as an act of care and respect. They may place personal items on a grave to reflect the personality and character of a loved one. Other families may choose not to personalise at all.	

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	<p>Whilst the Council appreciates the benefit to families in being able to personalise a grave, it must also take into account the difficulties which are often (quite inadvertently) caused in excessive instances of the practice, particularly when graveside kerbs are installed. Unfortunately, kerbs, edging stones, fences, chippings, ornaments and toys placed over the grave space may all create access and operational difficulties. The GPP is a way of allowing families to place a measure of personalisation which does not result in these concerns.</p> <p><u>Raising Awareness of the Grave Personalisation Policy (GPP)</u> For the policy to succeed, it must be brought to the attention of grave-owners and cemetery users in a timely fashion. There are a number of opportunities to do so throughout the bereavement process:</p> <p><b><i>Before Placement of the Memorial</i></b> The staff of Bereavement Services highlight the provisions of the GPP from the very outset of their involvement with bereaved families, and continue to promote it throughout the grave purchase process.</p> <ul style="list-style-type: none"> <li>• All grave-owners are required to complete a Notice of Interment form prior to burial. This document contains a section, to be signed by the grave-owner, which specifically details the allowable personalisation area, and the types of item not to be placed therein, including kerbs.</li> <li>• In respect of new graves, the Grant or Ownership paperwork contains explanatory text regarding the GPP.</li> <li>• Following the funeral, all grave-owners are sent copies of the Council's 'Personalising a Grave Space' leaflet (see Appendix 1) and graphic sheet (above right).</li> </ul>	

## Personalising a Grave

These images are to show personalisation of graves in ALL sections of the cemetery



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	<ul style="list-style-type: none"> <li>• In addition, this graphic is used as a poster, which is prominently displayed throughout the cemeteries.</li> <li>• The Council's Rules and Regulations in Respect of the Borough Cemeteries refer specifically to the provisions of the GPP.</li> <li>• The Bereavement Services website contains full details of the GPP, with links to the Rules and Regulations and information leaflets.</li> </ul> <p><b><i>After Placement of the Memorial</i></b></p> <p>The Cemeteries Superintendent is present at the installation of every memorial. After installation he writes to every grave-owner:</p> <ul style="list-style-type: none"> <li>• To confirm that the fixing has been properly carried out;</li> <li>• To advise grave-owners to expect the mason's Certificate of Compliance;</li> <li>• To advise as to the forthcoming 28 day stability test;</li> <li>• To remind grave-owners of the GPP and explaining the reasoning behind it;</li> <li>• Enclosing further copies of the Council's GPP leaflets.</li> </ul>	
<b>Management of the GPP</b>	<p>Committee were provided with graphic examples of the different categories of grave personalisation which demonstrated those graves considered fully compliant with the GPP, those which were partially compliant, and those that were deemed not compliant. These could be summarised as follows:</p> <ul style="list-style-type: none"> <li>• <u>Categories 1 &amp; 2</u> (No kerbs or edging) – <u>fully compliant</u> with nothing at all on the grave (Category 1), or with a small number of easily removable items outside the personalisation area (Category 2).</li> <li>• <u>Category 3</u> (Kerbs or edging at the head of the grave only) – <u>partially non-compliant</u>, with unauthorised kerbs around part of the grave, and a small number of unauthorised items within.</li> <li>• <u>Category 4</u> (Kerbs or edging around the whole grave space and items within) – <u>non-compliant</u>, with unauthorised 'DIY' kerbs on the whole of the grave, and a large number of unauthorised items within.</li> <li>• <u>Category 5</u> (Kerbs or edging, with items inside and outside) – <u>non-compliant</u>, with unauthorised kerbs on the whole of the grave, and a large number of unauthorised items placed inside and outside the kerbs.</li> </ul> <p><u>How effective is the current GPP?</u></p> <p>In January 2017, the level of grave personalisation across all five of the Borough Cemeteries was audited. Of the 59,651 graves audited:</p> <ul style="list-style-type: none"> <li>• 98% were compliant, with either no personalisation at all, or where families have placed a few items outside the personalisation area at the head of the grave (Categories 1 and 2);</li> <li>• 1.8% were partially compliant (Category 3) where families have chosen to personalise a small area at the head</li> </ul>	

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	<p>of the grave:</p> <ul style="list-style-type: none"> <li>0.2% were non-compliant, with families choosing to place kerbs on the full length of the grave, and filling them with many items (Categories 4 and 5).</li> </ul> <p>These figures indicated a continuing upward trend in compliance when compared against audit data from 2009-2014 regarding the percentage of compliance in relation to new graves on lawned sections. In 2009-2011, 86.7% of graves were compliant (categories 1 and 2), rising to 89.5% in May 2014.</p> <p>The January 2017 audit also revealed high grave personalisation compliance (categories 1 and 2) across all five Borough cemeteries – this ranged from 95.8% in Billingham (lowest percentage of compliance) to 100% in Egglecliffe. The highest percentage of partial compliance (category 3) was at Billingham (4.2%) and the highest level of non-compliance (categories 4 and 5) was at Durham Road, Stockton (0.4%).</p> <p>The data suggests that the implementation of the GPP has been largely successful, with an overall low incidence of non-compliant personalisation across all five cemeteries. Encouragingly, personalisation in categories 4 and 5 is particularly low, at 0.2%. While Category 3 is slightly more common, at 1.8%, this level of personalisation is generally more manageable, and does not always bring about the difficulties associated with more extensive placement. Furthermore, when compared to the data from previous years, there is a clear downward trend in the placement of non-compliant personalisation which would indicate that efforts to promote the GPP have met with success.</p> <p>Nonetheless, it should also be borne in mind that whilst the extent of personalisation may appear minor, the 2017 figure of 2% non-compliance actually equates to 1183 individual graves, the majority of which are located in the most recent and frequently used sections of the cemeteries, and therefore have the potential to cause the most disruption.</p> <p><u>Enforcement</u></p> <p>In 2009, the complaints of a small, but distressed, minority brought about extremely negative publicity in connection with an improvement scheme to the Garden of St. Francis (the babies' garden in Durham Road Cemetery). This resulted in a more sensitive approach to the issue of enforcement. Bereavement Services' current practice is to adopt a softer position, working sensitively with families, to attempt to bring about improvement when access or encroachment concerns arise:</p> <ul style="list-style-type: none"> <li>Personal telephone calls or brief letters, asking to meet families, paying heed to significant dates, and allowing a respectful grieving period;</li> <li>Meeting with families, on-site, being mindful of the pain and distress they are experiencing;</li> </ul>	

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	<ul style="list-style-type: none"> <li>• Discussing how access is restricted due to placed edging, and allowing time to digest this information;</li> <li>• Endeavouring to reach an agreement on the reduction of the kerbs or edgings.</li> </ul> <p>The process can take time, and can take years to conclude, though numerous successes have been seen using this approach. A process map of the management of the GPP when issues arise was provided to Members confirming current practice, and examples of reductions of ‘DIY’ stone surrounds, wooden surrounds and cremated remains garden grave surrounds were highlighted.</p> <p>However, even with such an approach, negative publicity may still ensue, as in one case highlighted to Members from September 2016 where the Council requested a meeting to discuss the removal of an unauthorised, professionally installed set of full kerbs in Durham Road cemetery. Such media coverage is generally inaccurate, lacking in balance, and tends to focus on the distress of the families and individuals in question, without addressing the legitimate concerns of the Council. In addition, these cases frequently generate a great deal of activity on social media, including the organisation of online petitions. Even a cursory reading of such material indicates that public opinion on the issues at hand is sharply polarised, but often reveals a considerable level of support and understanding for the Council’s need to limit grave personalisation.</p> <p>Other than where families have voluntarily reduced personalisation, there has been no physical removal of items or kerbs by Council Officers.</p> <p>Additional difficulties present themselves when kerbs are professionally installed:</p> <ul style="list-style-type: none"> <li>• They are placed by masons without Council authority or approval;</li> <li>• They are usually designed to complement the headstone and form a single large memorial;</li> <li>• They are expensive to purchase and install, so families are reluctant to remove or shorten;</li> <li>• Such kerbs effectively become permanent;</li> <li>• They present a greater challenge for Officers to work with the family, as was evidenced in the media in 2016;</li> <li>• They have led to complaints from neighbouring grave-owners, seeking removal of the kerbs.</li> </ul> <p>It was noted that if a formal application was submitted to the Council for this type of work, it would be rejected.</p> <p><u>Complaints</u></p> <p>The Committee were informed that, over the last three years, only three formal complaints had been made to the Council regarding grave personalisation – it was noted that all three incidences concerned placement of excessive personalisation by other grave-owners, rather than dissatisfaction over an inability to place sufficient personal items.</p>	

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	<p>Members questioned if any feedback had been received from those grave-owners who refuse to conform to the GPP as to why they were not adhering to the stated guidance. It was reported that this can sometimes occur because others are not conforming (therefore they themselves do not see why they should follow the rules), and sometimes bereaved families feel that if they do not tend like others do they are not displaying the same level of love and respect to their loved ones as those of neighbouring graves.</p> <p><u>The Long View</u> The first year of bereavement is usually extremely difficult for families, and is likely to see a number of the deceased's relatives wishing to leave flowers and other tokens of affection on the grave. Eventually a family may remove, and then choose not to replace, DIY kerbs and other personalisation once the items have deteriorated, or their need to visit becomes less pronounced. On other occasions, personalisation features such as wooden fences and novelty items may perish naturally over time and disappear, as the family ceases to regularly visit and tend the grave.</p>	
<p><b>Review of the GPP – future options</b></p>	<p>The issue of grave personalisation is clearly divisive, with public opinion evenly split as to the extent to which it ought to be permitted, and also with regard to subsequent methods of enforcement for non-compliance. Indeed, the issue of removal is so emotive that any form of enforcement has the potential to cause hugely disproportionate negative publicity – conversely, a failure to enforce invites criticism and complaint. It is, therefore, essential that the likely consequences of any policy of enforcement must be fully considered and evaluated.</p> <p>The Committee was presented with a number of possible options for the management of personalisation:</p> <p><u>Continuation of the 'soft' approach</u> Essentially maintaining the status quo by continuing to concentrate on category 4 and 5 cases only, where access or encroachment is an issue, and attempting to persuade grave-owners to remove or reduce personalisation to an acceptable level.</p> <p><i>Pros</i></p> <ul style="list-style-type: none"> <li>• A 'tried and tested' approach, which can work in many cases.</li> <li>• Avoids outright confrontation, which can greatly upset many bereaved families, and result in potential negative publicity, or risk to Council employees.</li> <li>• Often, when grave-owners are made aware of the difficulties caused by their personalisation, they become willing to assist.</li> </ul>	

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	<p><i>Cons</i></p> <ul style="list-style-type: none"> <li>• Some grave-owners simply refuse to cooperate.</li> <li>• Lack of further sanction in absence of progress.</li> <li>• Can result in Council appearing ineffectual.</li> <li>• Working with families can take up a great deal of Officer time.</li> </ul> <p><u>A 'harder' approach to professionally fitted kerbs</u></p> <p>The Council could enforce the removal or reduction of professionally fixed kerbs, and also discipline any masons found to be supplying or installing them.</p> <p><i>Pros</i></p> <ul style="list-style-type: none"> <li>• Sends a clear message that the Council is pro-active, and that regulations will be enforced.</li> <li>• Will deter families from placing such kerbs in future.</li> <li>• May also deter families from placing 'DIY' kerbs, and thereby lead to overall improvement across the board.</li> <li>• Will please those families who do not approve of excessive personalisation.</li> </ul> <p><i>Cons</i></p> <ul style="list-style-type: none"> <li>• Likely to prove a controversial move, generating a great deal of adverse publicity.</li> <li>• Who will carry out the removal work? Where will the kerbs be stored? Potential personal risk to Council employees or contractors involved.</li> <li>• Will cause genuine distress to families concerned.</li> <li>• Does the Council enforce against pre-existing kerbs (post Grave Personalisation Policy 2009) or merely newly fitted ones?</li> <li>• Difficult to prove any 'case' against masons, in the absence of solid evidence.</li> </ul> <p><u>Blanket full enforcement</u></p> <p>The Council could go further, and compel the complete reduction of all kerbs and surrounds (professionally fitted and DIY), within a given timescale, providing due notice. The 'pros and cons' pertaining to the harder approach above would obviously be applicable here, albeit increased by a considerable order of magnitude, given the nature of the proposition. In addition:</p> <p><i>Pros</i></p> <ul style="list-style-type: none"> <li>• Could bring about a complete 'clean-up' of the cemeteries.</li> </ul>	

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	<ul style="list-style-type: none"> <li>• Could eliminate the operational difficulties caused by excessive personalisation.</li> <li>• Could provide a 'clean slate', discouraging ongoing personalisation, and simplifying future enforcement considerably.</li> </ul> <p><i>Cons</i></p> <ul style="list-style-type: none"> <li>• Likely to result in a level of adverse publicity previously unseen.</li> <li>• Real prospect of demonstrations and civil unrest.</li> <li>• High level of personal risk to Council employees or contractors involved in the programme, both on site and in office premises.</li> <li>• A considerable undertaking under any circumstances – audit data indicates that, as at January 2017, there were 1183 graves falling into categories 3, 4 and 5.</li> <li>• Contacting so many grave-owners in advance would present difficulties, as a considerable number are likely to have changed address.</li> <li>• Widespread genuine distress to grave-owners.</li> <li>• Considerable use of Officer time and resources.</li> </ul> <p><u>New Grave Personalisation Concept for New Cemeteries and Extensions to Existing Cemeteries</u></p> <p>The Council's grave personalisation data, gathered in audits of the existing cemeteries, clearly demonstrates that many families wish to place kerbs, albeit in varying sizes. It is equally apparent that many other families are satisfied with simple lawn graves, therefore is it possible to satisfy both groups, whilst also addressing the operational difficulties that often result from excessive personalisation? The extension to Durham Road Cemetery offers a 'clean slate' which can be used to develop fresh ideas and concepts, specifically designed to address these issues.</p> <p>In partnership with the Council's Horticultural and Cemeteries Teams, a new model has been developed, tailored to meet the needs of all bereaved families, which will also offer significant operational improvements. In summary:</p> <ul style="list-style-type: none"> <li>• The size of all full-size adult graves will be increased from 4' x 9' to 5' x 10', to accommodate increasingly larger coffins, to limit the movement of grave walls during excavation, and to provide a greater space between graves for bereaved families.</li> <li>• Three distinct grave types will be offered, each permitting a different level of personalisation, and thereby providing the bereaved with greater choices as to the grave's ultimate appearance.</li> <li>• Coupled with the section layouts, the new style graves should encourage compliance with the GPP, reduce access difficulties, and simplify maintenance and grass-cutting.</li> </ul> <p>It is anticipated that this model will commence in the Durham Road Cemetery Extension and, if successful, rolled out</p>	

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	<p>across future cemetery developments.</p> <p>Members were presented with a plan of the Durham Road Cemetery extension which is divided into six sections, each of which will contain graves of a particular type, with three distinct grave options available (see Appendix 2). Each of the three grave types permits a different level of personalisation.</p> <p>A number of further considerations in respect of this new concept were outlined:</p> <ul style="list-style-type: none"> <li>• It should be borne in mind that the scheme detailed above is intended for implementation in future burial grounds and extensions to existing cemeteries. It has the benefit of full advance planning and groundwork, and it will not be easily possible to retroactively apply this model to pre-existing cemetery sections.</li> <li>• It is essential that families are made fully aware of the three new grave options at the point of purchase, and that they properly understand the level of personalisation applicable to each option from the very outset.</li> <li>• In order to promote the new options, the intention is to provide promotional literature which sets out the available grave choices using clear text, coupled with attractive pictorial references (see Appendix 3 for draft leaflet).</li> <li>• Successfully imparting this information will also require effective partnership liaison between the Registrar of Births and Deaths and the North Tees Mortuary and Bereavement Officers.</li> <li>• For the concept to function as intended, a clear and well-publicised policy of enforcement will need to be in place to deal with any breaches of the GPP, and ideally authorising officers: <ul style="list-style-type: none"> <li>○ To write to grave-owners, requesting the removal of unauthorised items within a given time-period, and</li> <li>○ To remove such items in the absence of a satisfactory response.</li> </ul> </li> </ul> <p>Members raised several comments/questions in relation to this new concept (responses in <i>italics</i>):</p> <ul style="list-style-type: none"> <li>• If people are not conforming in the old cemetery areas, how likely are people to conform in the new areas, particularly if the Council is not enforcing the old areas? <b><i>Assurance was provided that full enforcement would be undertaken from initial opening of new extension.</i></b></li> <li>• Full personalisation collars option – won't this still be a tripping hazard? <b><i>There will be sufficient space between full-length collars for people to walk – designed to have a pathway.</i></b></li> <li>• New collars an excellent idea – clear on the space allowed which may not be the case with the current policy as people may find the current 25% allowance difficult to measure. <b><i>Bereavement Service will continue to work with families to arrange the marking out of the grave when requested.</i></b></li> <li>• Colour restriction for the collar may cause a problem – grave personalisation issues arise because people do not want the same. <b><i>The feasibility of other colour options and costs can be explored.</i></b></li> <li>• Will collar still look the same in a number of years' time? <b><i>20-year guarantee – product has already been tried and tested as is currently used for grave markers.</i></b></li> </ul>	

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	<ul style="list-style-type: none"> <li>• Should there be an area within a cemetery where people can personalise however they want, without the Council being liable – is this possible? <b><i>The responsibility of the overall safety within a burial ground lies with the burial authority, which has responsibilities 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.</i></b></li> <li>• People have to understand the options from the beginning, but this is at the greatest point of bereavement – is this asking a lot of people at such a vulnerable time? <b><i>Bereavement Services will continue to work sensitively and compassionately with bereaved families, seeking the support of the Registrars and external organisations who are trained and understanding of the need to provide the information in the most appropriate and caring way.</i></b></li> <li>• In light of the different options having varied costs, is there a risk that people may purchase a cheaper option and encroach over time – need clear enforcement, and enforcement needs to be prompt or else issues may spread quickly. <b><i>Assurance was provided that full enforcement will be undertaken from initial opening of new extension.</i></b></li> <li>• Would it not be more prudent to carry on with the current policy and continue trying to reduce non-conformity year-by-year, particularly as that approach is reported to have been successful since it was implemented?</li> </ul> <p>The Committee were informed that these new proposals had been put forward by Officers who have lived this for many years. Whilst some sites are not quite fit for purpose any longer, Stockton performs well when compared to other Local Authorities, even though people's grieving is changing. The new proposals would need to be enforced from day one (start as the Council means to go on), with emphasis put on the fact that this enforcement is for new sites (not intermingled with existing sites).</p>	
<b>Conclusions</b>	<p>Audit data indicates that implementation of the GPP has delivered a steady and continuing decrease in problematic grave personalisation. The Council's most recent information confirms that, of a total of 59,651 graves across the five cemeteries, only 2% featured non-compliant personalisation. Nonetheless, excessive grave personalisation, and particularly the fixing of kerbs, can lead to a number of issues:</p> <ul style="list-style-type: none"> <li>• Operational Issues for Cemeteries Staff <ul style="list-style-type: none"> <li>○ Kerbs restrict the use of the mechanical excavator, resulting in reduced efficiency in grave preparation;</li> <li>○ Kerbs require removal prior to the re-opening of a grave for a second burial (and possibly requiring the services of a mason);</li> <li>○ Grass-cutting and general maintenance is hampered by kerb placement.</li> </ul> </li> <li>• Access Issues for Visitors <ul style="list-style-type: none"> <li>○ It becomes difficult for coffin-bearers to lower, and for mourners to attend at the graveside;</li> </ul> </li> </ul>	

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	<ul style="list-style-type: none"> <li>○ Wheelchair or disabled access may become impossible;</li> <li>○ It becomes difficult for memorial masons to move headstones;</li> <li>○ The likelihood of accidents is increased.</li> </ul> <p>When problems do arise, they frequently attract disproportionate negative publicity, and usually require disproportionate effort to resolve. Accordingly, when considering the GPP, and in particular the scope of any enforcement action in existing cemetery sections, the Council needs to be mindful of the likely effect of such action, and weigh the potential benefits against possible negatives.</p> <p>New concepts, implemented in future cemetery developments, might provide additional and/or complementary means of regulating and managing personalisation issues. It may be that the adoption of such concepts will require a separate, dedicated policy, dealing with their specific details, and operating in tandem with the original GPP.</p> <p>It should be noted that in order to ensure the success of the new model (and regardless of decisions made in relation to enforcement in older cemetery sections), there is a requirement for a sufficiently robust policy of enforcement, which is clear, fair, well-publicised, and applicable as of right.</p>	