CHIGWELL CEMETERY

Audit Report
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ICCM

Institute of Cemetery and
Crematorium Management

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Executive Summary

This independent audit of Chigwell Cemetery was commissioned by Chigwell Parish Council and undertaken on behalf of the Institute of Cemetery and Crematorium Management (ICCM) to assess the management, administrative, and operational arrangements in place. The purpose was to ensure the Council is meeting its statutory obligations under the Local Authorities' Cemeteries Order 1977 (LACO), associated Burial Acts, and relevant health, safety and environmental legislation.

The audit involved a full site inspection, review of documentation and registers, and discussions with the Parish Clerk, Cemetery Registrar, and grounds staff. Findings were assessed against ICCM standards and national best practice for local authority cemeteries.

Overall, Chigwell Cemetery is well cared for and professionally managed, supported by a small, dedicated team who take clear pride in maintaining a dignified environment. Grounds presentation and mapping are strong, and administrative records are orderly. However, the audit identified areas where systems and governance arrangements could be strengthened to ensure long-term resilience and full compliance.

Administrative processes remain largely manual, relying on paper registers, Word and Excel files, and staff experience. Under utilised use of the current digital system and a single management policy has led to duplication of effort and some inconsistencies in documentation. Renewal processes for cremated remains and garden of remembrance plots are being addressed, though a digital solution would streamline and safeguard these in future.

Operationally, the cemetery runs smoothly, but staff have not yet received formal COTS training, and there is currently no routine grave-marking process prior to excavation. Health and safety arrangements exist informally but are under-documented, and a cemetery-specific policy and inspection programme should now be introduced.

Memorial safety inspections have not yet commenced, and this represents a key compliance gap. Introducing a structured inspection programme and relevant staff training should be treated as a priority.

In conclusion, Chigwell Cemetery provides a valued and compassionate service. By maximising the use of the current digital management system, strengthening policy frameworks, delivering staff training, and introducing formal inspection regimes, the Council can ensure the cemetery remains compliant, efficient, and sustainable for the years ahead.

1. Introduction and Scope of Audit

The Internal Audit of Chigwell Cemetery was commissioned by Chigwell Parish Council and undertaken on behalf of the Institute of Cemetery and Crematorium Management (ICCM) to provide an independent, comprehensive assessment of the management, governance, and operational arrangements in place at the cemetery.

The purpose of the audit was to determine whether existing practices comply with statutory duties and reflect current sector best practice as set out by the ICCM and associated professional bodies. It sought to evaluate the effectiveness of the Council's role as a Burial Authority in meeting its obligations under national legislation, while ensuring that services are delivered in a safe, consistent, and respectful manner.

Legislative Context

The audit considered the cemetery's compliance with the following key legislation and statutory instruments:

- The *Local Authorities' Cemeteries Order 1977 (LACO)*, which sets out the legal framework for the management of local authority cemeteries.
- The *Burial Acts 1852–1986*, covering burial rights, record-keeping, and operational duties.
- The *Health and Safety at Work Act 1974* and associated *Management of Health and Safety at Work Regulations 1999*.
- The *Environmental Protection Act 1990*, particularly in relation to site management and waste control.
- Relevant equality, data protection, and public sector governance requirements.

Best Practice Framework

Alongside legislative compliance, the audit assessed operations against ICCM Best Practice Guidance, including the:

- *ICCM Guiding Principles for Burial and Cremation Authorities*, which define standards of professionalism, accountability, and service quality.
- *ICCM Code of Practice* for cemetery management, covering administration, memorial safety, and operational procedures.
- *Charter for the Bereaved* framework, which promotes choice, transparency, and continuous improvement in bereavement services.

These frameworks establish the expected standards for record accuracy, health and safety management, staff competence, and the dignified operation of cemeteries under local authority control.

Scope of Audit

The audit examined all principal aspects of cemetery management, including:

- Governance, policy, and legislative compliance.
- Administrative systems, record-keeping, and digital processes.

- Operational practices relating to burials, grave digging, and interments.
- Grounds maintenance, inspection, and general upkeep.
- Health and safety management, including staff training and contractor oversight.
- Memorial installation and safety inspection procedures.
- Lease administration for cremated remains and garden of remembrance plots.
- Financial procedures and opportunities for income development.

Methodology

The audit methodology combined document review, site observation, and stakeholder consultation. It included:

- Examination of cemetery registers, grave ownership records, leases, and documentation held both manually and on the Scribe system.
- Review of policies, procedures, risk assessments, and financial records relevant to cemetery operations.
- A full on-site inspection to observe maintenance standards, record-keeping practices, and operational procedures.
- Structured discussions with the Parish Clerk, Cemetery Registrar, and grounds operatives to clarify workflow, roles, and challenges.
- Comparison of current practice with legislative requirements and ICCM best practice benchmarks.

This mixed-method approach ensured that conclusions were drawn from both documentary evidence and first-hand observation, providing a balanced and accurate overview of performance and compliance.

Acknowledgement

The auditor wishes to record sincere thanks to the Parish Clerk, RFO, Cemetery Registrar, and grounds staff for their cooperation and openness during the audit. Their professionalism, sector knowledge, and clear commitment to maintaining high standards within Chigwell Cemetery were evident throughout and are acknowledged as a key strength of the service.

2. Administrative and Record-Keeping Practices

The administration of Chigwell Cemetery is undertaken by a part-time Cemetery Registrar who works twenty hours per week and is responsible for the day-to-day management of burial administration, grave ownership, correspondence, and liaison with funeral directors and memorial masons.

The Parish Council uses the Scribe software platform to record burials, plot details, and associated financial transactions. Scribe is a management system designed specifically for town and parish councils, incorporating modules for cemetery administration, allotment management, and community facility operations. The system is fully capable of producing deeds, permits, and correspondence, while maintaining an integrated audit trail and secure document storage.

During the audit, it was noted that not all of these available functions are currently being utilised. The Registrar has been relying on manual registers, Word documents, and Excel spreadsheets to record and produce documentation, resulting in duplication of data and additional administrative workload. This underuse of the system's integrated tools, rather than any limitation of the software itself, has contributed to the inefficiencies observed.

Each grave or plot has a corresponding manual folder containing hard copies of documents such as the application for interment, the burial certificate, grave deed, correspondence with funeral directors or families, and any memorial permit applications. These folders form a valuable physical record, but because the system depends entirely on manual processes, there is potential for information to be missed or filed inconsistently. In older records, some folders lacked complete documentation — particularly in relation to ownership transfers, where evidence such as statutory declarations was not always attached.

The issuing of grave deeds is managed manually using Word templates, with each deed number generated by hand and recorded in both the register and the folder. A receipt section is retained in the office copy of the folder. When a transfer of ownership occurs, a line is drawn through the original receipt, and the new owner's details are handwritten on the reverse side. Although this creates an internal record of change, it is not a formally auditable or automated system.

Recent evidence shows improvements in how transfers are handled, with the Registrar now ensuring that appropriate supporting documentation is provided before any transfer is processed. The officer's knowledge of LACO 1977 and the legal requirements for ownership rights is sound, and the process is now being applied with greater consistency and oversight.

Overall, the administrative process is functional and conscientious, but heavily reliant on manual input and local knowledge. Greater utilisation of the full functionality within the Scribe system would enhance efficiency and accuracy, ensuring that administrative tasks are streamlined and supported by a clear, centralised audit trail.

It is also recommended that a written process guide be developed to set out each stage of administration — from the initial application and booking of a burial through to the issue of deeds, transfers, and memorial permit management. While existing checklists provide some support, a more

comprehensive procedures manual would ensure consistency and continuity in the event of staff changes.

The cemetery maps and grave plans were reviewed as part of this audit and were found to be clear, well-maintained, and regularly updated. All plots checked corresponded accurately to the mapping and section layout within the grounds.

2.1 Burial and Grave Administration

Burial administration is undertaken using both manual and digital systems. All burial bookings are entered into a manual diary maintained by the Cemetery Registrar. The Council currently allows for one burial per day, which is a manageable and appropriate approach given staffing levels and the scale of the cemetery.

Once a burial is booked, the Registrar completes the associated paperwork and provides the operative with a Burial Risk Assessment Form. This is a good practice measure that ensures the grave site is checked for access, stability, and safety before excavation. The operative is responsible for completing this form and returning it for filing in the relevant grave folder.

The funeral director is informed in advance if an existing memorial requires removal prior to the burial taking place. This communication process helps to avoid delays and ensures that memorials are removed safely and reinstated after interment. The associated documentation, including risk assessments and correspondence, is filed in the relevant grave folder, creating a traceable record of actions taken.

The registers of burials, purchased graves, and grave ownership are generally well kept and align closely with the manual and digital records. However, occasional gaps were identified where purchase grave numbers had not been cross-referenced in all registers, making reconciliation more difficult. The manual numbering of burials and deeds — both of which must then be entered separately into Scribe — creates unnecessary duplication of work and increases the risk of transcription error.

2.2 Memorial Administration

Memorial administration is carried out by the Cemetery Registrar, who receives and processes all memorial permit applications. Applications are checked to ensure they meet cemetery regulations and industry standards before approval. Once approved, an email confirmation is sent to the memorial mason granting permission to carry out the work.

There is currently no formal permit numbering system in place, meaning permits are tracked manually through correspondence and plot files. Masons are expected to notify the cemetery office of the intended installation date; however, this communication does not always occur in practice, and new memorials are sometimes installed without prior notice.

Follow-up checks to ensure that memorials have been fixed to industry standards — in line with the NAMM Code of Working Practice or BRAMM standards — are undertaken on an informal basis but are not currently recorded consistently. This is largely due to limited staffing resources. As a result, there is no structured process to confirm that all new memorials have been inspected following installation, which in turn makes it difficult to incorporate them accurately into a future memorial inspection programme.

While the administration of permits is professional and compliant at the application stage, it would benefit from a more formalised system to record permit approvals, installation notifications, and follow-up inspections. Once a routine inspection regime is established (as recommended later in this report), new memorials should automatically be added to the inspection database to ensure continuous monitoring and compliance.

2.3 Cremated Remains (CR) Section

The Cremated Remains (CR) section is managed in the same way as full burials, with each plot having its own folder containing the lease documentation, correspondence, and interment details.

A review of records dating from 2016 onwards identified that some folders were missing cremation certificates or written notation confirming the precise position of ashes within the plot. There is also inconsistency in how many sets of ashes are permitted per plot, with older records indicating up to eight interments while more recent documentation allows for four. This inconsistency has led to confusion for both staff and families and requires clarification within the cemetery's regulations.

The Cremated Remains (CR) section operates under 5- or 10-year leases. A number of plots are currently out of dedication, as renewals have not historically been administered on a consistent or routine basis. At the time of audit, no formal programme had yet been implemented to address the backlog of expired leases. It is recommended that a structured renewal exercise now be undertaken to regularise all existing plots, supported by a clear process for contacting owners, issuing renewal documentation, and recording responses within the administrative system.

Historically, the Council used a deed of grant template for ashes plots rather than a lease agreement, which is not appropriate for this type of right. A new Lease Agreement Template has now been created and is being used going forward, which represents good progress.

Although renewals and correspondence are carefully managed, they remain entirely manual. Tracking lease expiry dates via spreadsheets and folders is time-consuming and vulnerable to oversight. A modern digital system with automatic reminders and renewal tracking would significantly improve efficiency and accuracy.

2.4 Garden of Remembrance (GR) Section

The Garden of Remembrance (GR) section provides leased ashes plots, typically associated with rose bushes and small plaques. These are also offered on 5- or 10-year leases.

Historic records show that lease renewals were inconsistently managed, with several expired plots still in place without current dedication. Renewal fees charged in previous years were not always aligned with the Council's published fee schedule. The Registrar has since commenced a full renewal programme, issuing letters to all identified leaseholders and placing notices on those plots where correspondence has been returned. These notices will remain in place for a period of six months to give families an opportunity to respond before plots are reclaimed and reallocated.

On-site inspection found the GR section to be in need of improvement. Many rose bushes have been lost or are in poor condition, and the overall appearance of the area is tired. Plans are in place to replant the area and replace missing roses, which will significantly enhance its presentation. The GR section has strong potential to be revitalised into a key memorial feature and a valuable source of sustainable income.

As with the CR section, records for the GR area are maintained manually within folders and spreadsheets. Renewal tracking, correspondence, and financial recording would benefit greatly from digitalisation and a consistent renewal management process.

Summary

In summary, administrative processes within Chigwell Cemetery are conscientious and carried out with diligence by an experienced Registrar who demonstrates strong knowledge of cemetery legislation and practice. However, the reliance on manual systems and fragmented record-keeping presents inefficiencies and risks.

The current use of Scribe, Word, and Excel creates duplication of effort and lacks an integrated audit trail. A review and training on all functionality of the current cemetery management system would modernise administration, streamline renewals, automate numbering, and consolidate all records — including burials, leases, and memorial permits — into one central platform.

To ensure consistency and business continuity, the introduction of a written administrative procedures manual would further strengthen governance. This should outline all processes, from initial burial application to memorial installation and renewal, supported by checklists and templates. Such improvements would enhance both compliance and resilience while preserving the professional standards evident across the cemetery's operations.

3. Grave Digging and Burial Operations

The operational delivery of burials at Chigwell Cemetery is undertaken by the Council's own grounds staff, who also carry out general cemetery maintenance. In the event of staff absence, leave, or exceptional workload, an external contractor is engaged to undertake grave digging duties. This arrangement ensures continuity of service, although the oversight and consistency of external works require continued monitoring and review to ensure compliance with health and safety standards and the Council's grave digging policy.

The Council has an adopted Grave Digging Policy (2025) which provides a general framework for grave preparation, safety, and site presentation. However, there is no formal training record for staff to evidence competence in grave digging, shoring, or safe excavation techniques. It was confirmed during interviews that neither operative currently holds a formal COTS (Cemetery Operatives Training Scheme) qualification. While both operatives have considerable experience and demonstrate good practical understanding, formal certification would provide assurance of competence and align practice with ICCM and national standards.

Burial operations are generally undertaken safely and professionally. Each burial is preceded by a site-specific risk assessment, completed by the operative once the booking has been confirmed by the Cemetery Registrar. The risk assessment form records ground conditions, proximity to existing memorials, access considerations, and any potential hazards. This process represents good practice and is consistent with ICCM recommendations for pre-burial safety checks. Completed assessments are filed within the relevant grave folder as part of the administrative record.

The audit noted, however, that the marking of graves prior to excavation is not currently undertaken as part of the routine procedure. This introduces a risk of misalignment, particularly in the newer lawn grave sections where space is being developed more intensively. The absence of physical marking and measurement before digging has already resulted in some graves not being in straight line formation,

which not only impacts the visual uniformity of the section but also risks inefficient use of valuable land space.

It is recommended that the marking out of graves be reinstated as a standard operational step. This would involve the Registrar or operative physically marking the grave position on the ground using the section plan before excavation commences. The introduction of a measured grid system in lawn areas would help to maintain alignment and allow clear demarcation for future development.

The use of boards and matting to protect the surrounding area during preparation and after the burial was confirmed during interviews with operatives and represents good practice. The operatives also described the process of checking whether any existing memorials need to be removed prior to the burial. This is done in consultation with the Registrar, who notifies the funeral director and ensures the family or mason is informed in advance. Memorials requiring removal are identified during the initial risk assessment stage, and the relevant paperwork is kept within the plot folder to provide a record of the decision and communication.

Excavation depth and grave preparation are undertaken manually using appropriate shoring and safety equipment. However, there is currently no formal inspection checklist for graves prior to the interment taking place, beyond the operative's own judgment and experience. Introducing a pre-burial inspection form, signed by the operative and countersigned by the Registrar, would provide an additional level of assurance that graves are prepared to the correct dimensions and meet safety standards.

While the practical standards of grave digging observed and reported were satisfactory, the documentation and procedural framework supporting the activity require strengthening. Health and safety documentation such as Risk Assessments and Method Statements (RAMS) for both internal staff and external contractors should be regularly reviewed and updated. It was noted that contractor RAMS are not always retained on file following individual engagements, and therefore a consistent record of their compliance is not available for audit purposes.

As the same operatives are also responsible for general grounds maintenance, the time available for detailed checks and post-burial inspections can be limited. Introducing a clearer distinction between operational responsibilities — with one member of staff leading on grave digging and another on routine maintenance — would improve workflow management and reduce the likelihood of procedural steps being overlooked during busy periods.

Consideration could also be given to the installation of concrete shoulders within the newer lawn grave sections. This approach, which has been successfully adopted in other cemeteries, provides a permanent foundation for memorials, keeps rows straight, and simplifies grave marking for future use. It also helps reduce ground subsidence around memorials and simplifies grass cutting and general maintenance.

Although the Council's current system relies heavily on the skill and commitment of the operative team, formalising procedures through training, written checklists, and improved documentation would provide greater resilience and consistency. The operatives themselves displayed professionalism, clear understanding of safe working practices, and pride in the appearance of the cemetery. Supporting their work with additional training and procedural tools would strengthen both compliance and efficiency.

Summary

Grave digging and burial operations at Chigwell Cemetery are competently undertaken, with clear attention to safety and presentation. The use of pre-burial risk assessments and communication with funeral directors regarding memorial removal demonstrate a conscientious approach and adherence to good practice. However, the lack of formal COTS training, inconsistent grave marking, and limited procedural documentation represent areas for improvement.

By introducing structured pre- and post-burial inspection procedures, updating contractor documentation, and implementing a systematic approach to grave marking, the Council can enhance both operational efficiency and compliance with ICCM and health and safety standards.

4. Grounds Maintenance and General Management

Grounds maintenance at Chigwell Cemetery is undertaken by the same two operatives who also carry out grave digging duties. This dual responsibility ensures continuity and familiarity with the site but can create pressures during busy operational periods, particularly when burials coincide with maintenance requirements. Despite this, the overall condition and presentation of the cemetery are good. The grounds are tidy, well maintained, and reflect the pride and care shown by the staff in their work.

The cemetery is predominantly laid out as a lawn-type cemetery, with formal sections, mature trees, and paths that provide a clear structure. Routine maintenance includes grass cutting, litter removal, and the upkeep of paths, boundaries, and shrub planting. The site benefits from being compact and easily manageable, allowing visual inspection of most areas during day-to-day activities.

A tree survey was undertaken recently, which represents good practice. The survey provides a record of condition, species, and management recommendations for each tree within the grounds. It is essential that this survey be updated annually to ensure continued monitoring of tree health, risk of limb fall, and general safety — particularly in areas near paths, benches, and burial sections.

Although the grounds were found to be generally well cared for, there is currently no structured inspection regime or documented record of regular maintenance checks. No monthly Health and Safety inspection reports were available for review. This means that while staff undertake visual checks informally, there is no formal audit trail demonstrating compliance with the *Health and Safety at Work Act 1974* or *Management of Health and Safety at Work Regulations 1999*.

Introducing a monthly inspection checklist covering paths, benches, fencing, gates, roads, drainage, and signage would provide a simple but effective means of evidencing compliance and identifying maintenance needs before they develop into more significant issues. Recording these inspections would also allow trends to be monitored and ensure that repairs or defects are addressed promptly.

The cemetery's paths are generally in satisfactory condition, though some uneven sections were noted in older areas. Benches are appropriately placed but should be included within routine inspections for stability and condition. Boundary fencing appears in good order. Any future inspection schedule should also include memorial kerb sets and walling, even where these are not formally within the memorial inspection regime, to ensure that all potential hazards are identified.

The marking of new lawn sections has been noted as an area requiring attention. In several recently developed areas, graves have been positioned without formal alignment markings, leading to uneven rows and potential inefficiencies in future land use. This issue is also referenced in Section 4, but it carries implications for overall site planning and maintenance. A planned layout with measured rows

would improve not only aesthetics but also maintenance efficiency, as straight rows are easier to mow and maintain.

General waste management on site was found to be appropriate, with waste collected and disposed of regularly. It may be beneficial for the Council to consider separating green waste for composting or reuse, in line with environmental sustainability objectives and ICCM environmental guidance.

The overall appearance of the cemetery is dignified and well maintained, and the staff clearly take pride in keeping the grounds to a high standard. However, the absence of recorded inspection processes or defined maintenance schedules means that evidence of compliance and forward planning is limited. Implementing formalised processes would strengthen operational resilience and demonstrate good governance to both the Council and the wider community.

Summary

Grounds maintenance at Chigwell Cemetery is performed with commitment and care, and the cemetery presents well to visitors. Staff carry out their duties diligently and are responsive to operational demands. The recent tree survey is a positive step, and its continuation on an annual basis is recommended.

However, the lack of documented maintenance and inspection records represents a gap in compliance and operational oversight. Introducing a simple but consistent inspection and reporting regime would provide a clear audit trail and further evidence of the Council's proactive management of the cemetery. Aligning these processes with ICCM guidance and health and safety requirements will ensure that Chigwell Cemetery continues to be both safe and well presented for the public it serves.

5. Memorials and Safety Inspections

The management of memorials within Chigwell Cemetery is an important area of responsibility for the Burial Authority, both in terms of maintaining public safety and ensuring compliance with industry standards. Memorials form a significant and visible part of the cemetery landscape, and the way in which they are administered, inspected, and maintained has a direct impact on public confidence and operational risk.

At present, there is no formal memorial inspection programme in place at Chigwell Cemetery. While day-to-day visual checks are undertaken informally by the grounds staff, there are no records of systematic inspections, nor is there an established policy setting out inspection frequency, testing methods, or procedures for dealing with unstable memorials. It was confirmed during the audit that no formal memorial inspections have been carried out in recent years, and any previous records, if they existed, are no longer available.

Memorial permit applications are managed by the Cemetery Registrar as part of the administrative process (outlined in Section 3.2). Each application is checked to ensure that it complies with cemetery regulations, and the corresponding mason is notified by email once permission has been granted. However, there is no numbering system for permits, and there is no formal follow-up routine to confirm that newly installed memorials have been fixed in accordance with the *National Association of Memorial Masons (NAMM) Code of Working Practice* or *BRAMM* standards.

While the Registrar maintains good communication with masons and ensures applications are correctly processed, the current staffing level and manual system limit the ability to monitor

installation activity closely. This means that some memorials may be erected without formal notice or post-installation checks, creating a gap in the audit trail of safety assurance.

In line with the *ICCM Management of Memorials Guidance (2022)* and the *Ministry of Justice's Guidance on Managing the Safety of Burial Ground Memorials (2009)*, it is the responsibility of the Burial Authority to ensure that all memorials within the cemetery are stable and maintained in a safe condition. This applies not only to newly installed memorials but also to existing ones, regardless of ownership.

A formal Memorial Safety Inspection Programme should therefore be established. This should include:

- A comprehensive baseline inspection of all memorials in the cemetery, to assess condition and identify any immediate safety concerns.
- The creation of a digital memorial register, containing details of each memorial, its condition, photograph, and inspection date.
- Clear procedures for temporary marking, cordoning, or staking of unsafe memorials.
- Defined timescales for re-inspection (typically every five years) in accordance with ICCM best practice.
- A structured communication plan to inform families and the public about the inspection process.

Training should be provided for staff undertaking inspections. Formal mechanical testing is no longer required under current ICCM guidance; instead, visual and hand tests are recommended, using gentle pressure and observation to assess stability. Training will ensure that inspections are carried out consistently and safely, with appropriate judgment used to differentiate between memorials that pose genuine risk and those requiring only monitoring or minor maintenance.

It is acknowledged that staffing levels may make it challenging to complete a full inspection programme in a single year. However, a phased approach — beginning with the oldest sections of the cemetery where memorials are more likely to be unstable — would allow progress to be made incrementally while maintaining a clear record of inspection activity.

In conjunction with this, a Memorial Safety Policy should be developed and adopted by the Council. This policy should define roles and responsibilities, inspection frequency, methods of testing, communication procedures, and record-keeping requirements. It should also reference ICCM and Ministry of Justice guidance to ensure alignment with national standards.

Once established, the inspection programme will not only improve safety but also provide assurance to the public and regulatory bodies that the Council is meeting its duty of care. Furthermore, it will help create a comprehensive and up-to-date memorial register, supporting long-term management and informing future maintenance decisions.

Summary

The memorial management arrangements at Chigwell Cemetery are functional but currently underdeveloped in terms of inspection and record-keeping. While new memorial applications are handled correctly and in accordance with regulations, the absence of a structured inspection programme represents a significant compliance gap.

Introducing a formal Memorial Safety Policy and implementing a rolling inspection regime — supported by staff training and a digital register — will address this issue. It will also enable the Council to

evidence compliance with its statutory duty of care and ICCM best practice, ensuring the cemetery remains both safe and professionally managed.

Consideration should be given to purchasing digital memorial management Software to ensure that inspection regimes are administered and recorded. Follow up communication with memorial owners and outcomes, and reinspection's are easily produced and logged.

6. Health and Safety Compliance

Health and Safety (H&S) management is a fundamental responsibility of any Burial Authority, ensuring the protection of staff, contractors, and visitors to the cemetery. The audit reviewed Chigwell Parish Council's current approach to H&S within cemetery operations, including documentation, training, risk management, and inspection processes.

At present, the Council operates under a generic Parish Council Health and Safety Policy, which provides overarching guidance for all council services. However, this policy does not contain cemetery-specific risk assessments, operational procedures, or detailed control measures relating to grave digging, memorial safety, or public access within burial areas. As such, while the general duty of care is being met through safe working practices, there is insufficient evidence of a formalised, site-specific health and safety management framework for Chigwell Cemetery.

Policy and Documentation

The Council's Health and Safety documentation includes a general policy statement and some supporting risk assessments, but these are not tailored to cemetery operations. There is no dedicated cemetery H&S policy, nor a risk register identifying site-specific hazards such as grave excavation, unstable memorials, manual handling, slips and trips, or exposure to weather and uneven ground.

Risk assessments do exist for grave digging in the form of a pre-burial checklist (as discussed in Section 4). This is a positive measure, but it functions primarily as an operational form rather than as part of a wider documented risk management system. A structured register of all relevant cemetery hazards, reviewed and updated annually, would provide stronger evidence of compliance and allow systematic control of risks.

No evidence was found of monthly site inspections or documented walk-round checks to monitor general safety, maintenance, or environmental conditions. While staff routinely observe issues during their work and act promptly to address them, the absence of written records means that inspection and remedial actions cannot be tracked or audited.

Introducing a simple monthly H&S inspection log, signed and dated by the operative or Registrar, would provide an efficient means of demonstrating compliance with the *Health and Safety at Work Act 1974* and *Management of Health and Safety at Work Regulations 1999*.

Training and Competence

Staff display clear awareness of safe working practices and approach their roles with caution and professionalism. However, there are currently no formal training records or competence logs to evidence their understanding of site-specific risks. Neither operative has undertaken formal COTS (Cemetery Operatives Training Scheme) training or equivalent H&S certification relevant to grave digging, shoring, or use of machinery.

Although both individuals have many years of experience, the lack of formal qualification could expose the Council to potential challenge in the event of an accident. Establishing a training matrix covering all staff and contractors, with expiry dates and refresher requirements, would provide the necessary assurance and accountability.

Contractor Management

External contractors are occasionally used to undertake grave digging when staff are unavailable. However, no written evidence was available during the audit to confirm that contractors' Risk Assessments and Method Statements (RAMS), insurance certificates, or competence records are reviewed and retained.

All contractors working within the cemetery should be required to provide current RAMS and proof of public liability insurance before commencing work. Copies of these documents should be held on file and reviewed annually. This will ensure consistency of standards between internal staff and external providers, and protect the Council from potential liability.

Incident and Accident Reporting

The audit found no evidence of a formal accident or near-miss reporting system specific to the cemetery. While any serious incidents would be logged through the Parish Council's general reporting procedures, it is recommended that a dedicated log be maintained for all cemetery-related incidents, however minor. This would enable trends to be monitored, lessons learned, and future preventive measures implemented.

Public Safety and Accessibility

The cemetery is open to the public during daylight hours, and overall safety standards for visitors are good. Paths are clear and level, and signage is adequate. However, without formal inspection logs, there is limited evidence that path and structure conditions are regularly reviewed. Public safety risks, such as unstable memorials, uneven surfaces, or tree hazards, should be captured within the site's H&S framework and addressed as part of the regular inspection regime described in Section 5.

Assessment

Overall, while the practical approach to safety on site is sound and carried out conscientiously by staff, the documentary framework supporting this practice is underdeveloped. There is clear evidence of safe working habits, but limited ability to demonstrate formal compliance with statutory duties. The introduction of structured risk management documentation, training records, and inspection routines would provide tangible assurance of compliance and strengthen overall governance.

Summary

Health and Safety at Chigwell Cemetery is managed effectively on a day-to-day basis through staff awareness and practical caution, but lacks the formal structure and documentation required to fully evidence compliance with statutory and best practice standards.

Developing a dedicated Cemetery Health and Safety Policy, supported by a risk register, monthly inspection logs, and a training matrix, would provide a clear framework for managing risk. Ensuring that contractor documentation is verified and retained will further demonstrate robust governance.

By aligning local practice with ICCM guidance and statutory obligations, the Council can ensure that both staff and visitors remain safe, and that the cemetery operates transparently and defensibly under its legal duties.

7. Conclusions and Key Recommendations

The audit of Chigwell Cemetery has identified a service that is managed with care, professionalism, and genuine pride by a small but committed team. The cemetery presents well, the grounds are tidy, and the staff demonstrate a strong understanding of their responsibilities. It is clear that the Parish Council and its officers are committed to maintaining a respectful and dignified environment for families and visitors.

However, the audit also found that the service operates largely through traditional manual systems, supported by individual knowledge and experience rather than structured processes or integrated digital management. While this approach has ensured continuity and personal accountability, it carries inherent risks in terms of efficiency, transparency, and long-term resilience.

The administrative systems currently in use — combining manual registers, Word and Excel documents, and the Scribe platform — work adequately but lack integration. The reliance on multiple disconnected tools requires duplicate data entry, increases the potential for error, and makes it difficult to produce reports or audit trails. A more modern and unified management system would substantially improve efficiency, accuracy, and oversight.

Operationally, the cemetery is well run. Burials are managed safely and with care, and the use of risk assessments prior to grave excavation represents good practice. The grounds are maintained to a high standard, and the overall presentation of the site reflects well on the Council. Nonetheless, the absence of formalised training records, inspection logs, and procedural documentation creates gaps in the evidence required to demonstrate compliance with statutory obligations and ICCM best practice.

The same is true for memorial management and safety inspections. While new memorial permits are being processed correctly, no formal inspection programme currently exists, leaving the Council without assurance that all memorials on site are stable and compliant. The introduction of a structured inspection routine, supported by trained staff and a clear policy, is therefore essential.

Health and Safety documentation requires further development. The Council's generic policy provides an overarching framework, but it does not specifically address the unique risks associated with cemetery operations such as grave excavation, memorial stability, and public access to burial areas. Developing a cemetery-specific H&S policy, complete with a risk register, accident log, and training matrix, would provide robust evidence of compliance and proactive management.

Financially, the service is stable, though there are opportunities for future income generation. The Garden of Remembrance and Cremated Remains sections, once fully regularised and re-landscaped, could be enhanced to increase both visitor appeal and income potential. In particular, the introduction of above-ground memorial options — such as columbaria or niche walls — would broaden the cemetery's offering and reflect contemporary trends in ashes memorialisation.

The audit also highlights the potential for improved record-keeping and administrative continuity. The current Registrar's knowledge and diligence are significant assets, but the reliance on individual expertise rather than written procedures presents a vulnerability in the event of staff absence or turnover. Developing a detailed procedures manual, outlining step-by-step administrative workflows for burials, transfers, leases, and memorials, would safeguard consistency and ensure the smooth operation of the cemetery in the long term.

Overall Evaluation

In summary, Chigwell Cemetery is a well-presented and competently managed service that now stands at a natural point of transition. By strengthening governance, introducing digital systems, and formalising procedures, the Council can move from a largely manual and reactive operation to a proactive, compliant, and resilient service in line with ICCM and statutory expectations.

Key Recommendations

To support these outcomes, the following key recommendations are made:

7.1 Implement training on the current digital cemetery management system to integrate records, automate numbering, manage leases, and generate reports.

7.2 Develop and adopt a comprehensive Cemetery Management Policy, incorporating governance, operations, memorial management, and health and safety.

7.3 Introduce a formal Memorial Safety Inspection Programme, supported by an ICCM-compliant Memorial Safety Policy and digital inspection register.

7.4 Deliver formal COTS and H&S training for all operational staff and establish a central training matrix to monitor competence and refresher requirements.

7.5 Create a Cemetery-Specific Health and Safety Policy and Risk Register, supported by monthly inspection logs and annual reviews.

7.6 Reconcile all registers and administrative records, ensuring consistent numbering and cross-referencing across systems.

7.7 Complete renewal of Cremated Remains and Garden of Remembrance leases and maintain ongoing renewals through automated reminders.

7.8 Explore income-generation opportunities, including new ashes memorial schemes such as above-ground vaults or niche walls.

7.9 Document all administrative procedures in a written Cemetery Administration Manual to ensure continuity and standardisation.

7.10 Maintain and expand environmental and grounds maintenance records, including annual tree surveys and sustainability initiatives.

Conclusion

Chigwell Parish Council and its officers have demonstrated a clear commitment to providing a professional, dignified, and compassionate burial service to their community. With the implementation of the recommendations outlined above, the Council will not only achieve full compliance with statutory and ICCM standards but also establish a model of best practice in cemetery management for a parish-level authority.

8. Action Plan Summary

The following action plan summarises the key recommendations arising from this audit.
It is designed to provide Chigwell Parish Council with a clear, prioritised framework for implementing improvements to ensure compliance, strengthen governance, and enhance operational efficiency.

The plan identifies the priority level, key actions, suggested timescales, and responsible officers. These actions should be reviewed quarterly by the Parish Clerk and reported to Council to monitor progress.

The Council has confirmed that going forward, grave deeds and permits will be generated directly through Scribe, and the use of its document storage and diary functions will be reintroduced as part of standard practice. Although no formal training has been requested, it is recognised that a refresher session would be beneficial to ensure the system is used to its full capability. The Council intends to arrange this with Scribe to support the consistent management of all cemetery administration within the integrated platform.

This plan recognises that several actions — such as the introduction of development of policy frameworks — may require phased implementation and budget consideration. Others, such as procedural documentation or the introduction of inspection logs, can be achieved at minimal cost and will provide immediate improvements to governance and compliance.

Priority	Action / Recommendation	Timescale	Responsible Officer(s)	Intended Outcome
1	Implement Scribe training to ensure all its functionality is being utilised. The cemetery management system should be used to consolidate all records, automate numbering, and manage renewals.	Within 6–9 months	Parish Clerk / Cemetery Registrar / RFO	Improved efficiency, reduced risk of data loss, and stronger audit trail.
2	Develop and adopt a comprehensive Cemetery Management Policy incorporating governance, operations, and compliance.	Within 6 months	Parish Clerk / Council	Clear governance structure and standardised procedures.
3	Introduce a formal Memorial Safety Policy and implement a rolling inspection programme, supported by a digital inspection register.	Within 3–6 months	Parish Clerk / Cemetery Registrar	Statutory compliance and reduced public risk.
4	Deliver formal COTS training and health and safety training for all operational staff.	Within 6 months	Parish Clerk / Operations Lead	Evidenced competence and safer working practices.
5	Develop a cemetery-specific Health & Safety Policy and risk register, supported by monthly inspection logs.	Within 3 months	Parish Clerk / RFO / Operations Team	Documented risk management and compliance with legislation.

Priority	Action / Recommendation	Timescale	Responsible Officer(s)	Intended Outcome
6	Reconcile and standardise all manual and digital registers, ensuring accurate cross-referencing and numbering.	Within 4 months	Cemetery Registrar / RFO	Improved data consistency and ease of audit.
7	Complete lease renewal exercise for Cremated Remains and Garden of Remembrance sections. Implement ongoing renewal tracking.	Within 6 months	Cemetery Registrar / Parish Clerk	Full compliance and sustained income generation.
8	Develop and maintain an Administrative Procedures Manual covering burials, transfers, leases, and memorials.	Within 3 months	Cemetery Registrar	Continuity of knowledge and process clarity.
9	Conduct annual tree survey and introduce monthly grounds maintenance inspections, including benches, paths, and fences.	Ongoing / Annual	Grounds Operatives / Cemetery Registrar	Safe, well-maintained environment and documented evidence of compliance.
10	Explore and implement new income-generation initiatives.	Within 12 months	Parish Clerk / Council	Diversified income and improved service offering.

Implementation and Monitoring

The successful delivery of this action plan will depend on clear ownership and regular progress review. It is recommended that a brief quarterly progress report be provided to Council, outlining actions completed, those in progress, and any resource implications.

This approach will ensure transparency, maintain momentum, and demonstrate the Council's continued commitment to providing a safe, compliant, and well-managed burial service for the Chigwell community.

9. Methodology and Evidence Sources

9.1 Methodology

This audit was conducted in accordance with recognised professional standards for cemetery and crematorium management and reflects the principles set out within the Institute of Cemetery and Crematorium Management (ICCM) Best Practice Guidance and the ICCM Charter for the Bereaved.

The methodology combined desk-based review, field inspection, and consultation to ensure that all findings were evidence-based and accurately reflected current practice at Chigwell Cemetery. The approach was designed to provide a balanced and objective evaluation of the Council's compliance with its statutory obligations and alignment with ICCM sector standards.

The audit process comprised the following stages:

1. Document Review – Examination of all relevant policies, registers, forms, and correspondence relating to cemetery administration, memorial management, burial operations, and financial processes.
2. System Review – Evaluation of the use of the Scribe system for administrative and financial management, including assessment of its suitability for ongoing cemetery record-keeping and statutory compliance.
3. Site Inspection – A full on-site visit to Chigwell Cemetery, assessing grounds presentation, operational procedures, risk management, and record-keeping in practice.
4. Staff Interviews – Structured discussions with the Parish Clerk, Cemetery Registrar, and grounds operatives to establish workflow, responsibilities, and areas of challenge or good practice.
5. Compliance Assessment – Comparison of local practice with the requirements of the following key legislation and guidance:
   - *Local Authorities' Cemeteries Order 1977 (LACO)*
   - *Burial Acts 1852–1986*
   - *Health and Safety at Work etc. Act 1974*
   - *Management of Health and Safety at Work Regulations 1999*
   - *Environmental Protection Act 1990*
   - *ICCM Guiding Principles for Burial and Cremation Authorities*
   - *ICCM Code of Practice* and *Management of Memorials Guidance (2022)*
   - *Ministry of Justice Guidance on Managing the Safety of Burial Ground Memorials (2009)*

Throughout the process, findings were verified by cross-referencing documentary and observational evidence, and by discussing working practices directly with the officers involved.

The audit was carried out objectively and independently, with the purpose of identifying both areas of good practice and those requiring improvement. The recommendations contained in this report are designed to support Chigwell Parish Council in achieving full compliance, operational resilience, and long-term sustainability of its burial service.

9.2 Evidence Sources Reviewed

The following documentation and records were reviewed as part of this audit:

- Cemetery Internal Review Report (August 2025)
- CPC Grave Digging Policy (January 2025)
- Cemetery Regulations and Fees Schedule (2025–2026)
- Booking a Burial Procedure (Documented Process)
- Burial Checklist and Grave Selection Forms
- Audit Points Clerk Report (August 2025)
- Cemetery Map and Section Plans
- Tree Survey Report (2025)
- Cremated Remains and Garden of Remembrance lease documentation
- Scribe administrative and financial data extracts
- Sample memorial permit applications and correspondence

In addition, interviews were held with:

- Parish Clerk – Chigwell Parish Council
- Cemetery Registrar – Chigwell Cemetery
- Grounds Operatives – Chigwell Cemetery

- Funeral director communication – telephone conversations with a selection of FD`s were undertaken.