**Draft Email to be sent to Convenor, Vice-Convenor & Members of CEC**

**Culture & Communities Committee for meeting on Tuesday 15 September 2020**

Dear Convenor, Vice-Convenor and Committee Member,

1. On behalf of Friends of Newington Cemetery, a sub-group of Grange/Prestonfield Community Council, I draw your attention to Agenda Item 7.1 Cemetery Tour Guide Operator Registration Scheme for the meeting on September 15th 2020.

2. The report for this agenda item describes the problem, which this Tour Guide Operator Scheme is intended to deal with, where commercial interests conducting cemetery tours are costing CEC money on additional maintenance and clearing up at the affected cemeteries. We can understand that CEC wishes to recoup the cost of this, especially where increased footfall is creating problems. However, from a study of the Report queries arise which we think need to be resolved before implementing this Scheme and there may be others. Our initial queries are:-

a) We welcomed the change some years ago when CEC cemeteries were taken under CEC parks administration, which we think has been beneficial for local people, visitors and the cemeteries, recognising them as reservoirs of social and natural history and valuing their heritage and biodiversity. Given the parks management rules referred to in the Report can CEC now itself support the selling of tour services in its cemeteries and how could it then reasonably prevent other services being offered? This seems a rather important point of principle on governance of parks and would it require those CEC cemeteries with commercial tour guides to be under a different form of administration? If so this needs to be spelt out. The charging precedent quoted in the Report, Highgate Cemetery, is not wholly relevant. This Cemetery is run by a Trust which can do what the Trustees lawfully decide. It is not a public park.

b) It seems that the problems referred to in the Report are limited to the historic city centre graveyards within the UNESCO World Heritage Site. Although not clearly stated it seems as if the Tour Guide Registration Scheme would apply to all CEC cemeteries. Is this correct and if so is it necessary or desirable? This could have serious implications for Friends groups and other voluntary organisations conducting activities in cemeteries, where fund raising may be permitted. Would these groups conducting studies, family activities or tours have to register as a tour guide or employ a registered guide? If the proposed Scheme is to be limited to only a small number of cemeteries its applicability needs to be set out.

c) Cemeteries are visited for a variety of reasons. Newington Cemetery has Koreans from all over the world visiting a respected grave; likewise people of Gujarati origin come to visit another respected grave. They cause no problems and we welcome them. In some cases they may be part of a wider tour group visiting and normally this is not known, yet if this Scheme is adopted would such visitors have to employ a registered guide, who may well know far less than the visitors themselves. The commercial range of this Scheme needs to be set out.

3. We suggest there needs to be a robust business case made for this Scheme, which may well be costly to set up and administer, covering the vetting of tour guides, checking their activities and covering the cost of installing and running contactless payment machines. How to check for under counting or where guides ask for voluntary payment needs to be addressed. A range of commercial scenarios looking at best and worst case visitor numbers needs to be considered.

To summarise, we request that this Agenda Item be deferred for further detailed consideration and consultation with others such as cemetery friends groups, community councils and Elected Members in Wards with affected cemeteries.

Thank you,

Tony Harris

Chair Friends of Newington Cemetery

Member Grange/Prestonfield Community Council