

Culture and Communities Committee

10.00am, Thursday, 29 February 2024

Edinburgh Cemetery Tour Registration Scheme - Update

Executive/routine
Wards

Routine
All, particularly Ward 11 – City Centre

1. Recommendations

- 1.1 It is recommended that Culture and Communities Committee:
 - 1.1.1 Notes the outcome of further engagement with stakeholders and the responses received; and
 - 1.1.2 Agrees the revised fee structure for the Cemetery Tour Guide Registration Scheme, as set out in paragraphs 4.17 and 4.18.

Paul Lawrence

Executive Director of Place

Contact: Andrew Mitchell, Head of Regulatory Services

E-mail: andrew.mitchell@edinburgh.gov.uk | Tel: 0131 529 4042

Edinburgh Cemetery Tour Registration Scheme - Update

2. Executive Summary

- 2.1 On 11 May 2023, Committee [agreed](#) to amend the Edinburgh Tour Guide Registration Scheme, specifically in relation to the fees applicable. Committee also agreed that officers should further engage with the guides and report back on any further amendments to the fee structure once completed. This report updates Committee on further engagement with stakeholders with regard to the impact of the scheme and makes recommendations for further amendments to the scheme.

3. Background

- 3.1 The Council owns and operates 43 cemeteries, churchyards, and burial grounds across the city. For ease of reference, in this report they are all referred to as cemeteries.
- 3.2 The city has five historic city centre cemeteries in the UNESCO World Heritage area. Three of these (Canongate, Greyfriars and Old Calton) are Category A listed for the national significance of their monuments, memorials and walls. These cemeteries require expensive ongoing conservation and maintenance to keep them safe.
- 3.3 These cemeteries remain hugely popular with visitors. For example, around two million annual visitors to Greyfriars, making it the second most visited free to enter attraction in Scotland. Other city centre cemeteries (such as Greyfriars, St Cuthbert's and Old Calton) also receive significant annual footfall.
- 3.4 Whilst some visitors visit independently, there are numerous organised tours which generate significant visitor numbers. These tours are often organised by tour guide companies, often employing individual tour guides, although some guides used by the companies are self employed.
- 3.5 A Cemetery Tour Guide Registration Scheme was approved by Committee and introduced in 2020.
- 3.6 The Council's costs for maintaining the three busiest city cemeteries in 2022/23 was £86,000, with a further £38,000 incurred in staffing costs. On 11 May 2023,

following receipt of data which showed that the scheme (which was current at that time) had raised approximately £5,000 in each of the previous two years, Committee agreed to revise the applicable fees.

- 3.7 The revised fee structure agreed with effect from 1 July 2023 included:
 - 3.7.1 An annual registration fee for each individual company of £150; and
 - 3.7.2 Each individual guide to pay a registration fee of £120.
- 3.8 On 5 October 2023, Committee noted the progress made in implementing the revised scheme and the proposal to engage in further consultation with stakeholders.

4. Main report

Implementation of revised fee structure – 1 July 2023

- 4.1 The [new fee structure for Cemetery Tours](#) took effect on 1 July 2023. Uptake of the registration scheme was good, and there was no sign that the number of guides had dropped compared to the number of guides registered in previous years.

Tour Guide Registrations @ 25 January 2024		
Type of Registration	No. current registrations	Sum of all fees received
Tour Guide Employee Registration	104	£13,260
Tour Guide Operator Registration	239	£36,090
Total Fees Received	343	£49,350

Engagement

- 4.2 As reported on 5 October 2023, the changes to the scheme were generally welcomed. However, some operators expressed concerns about the consultation with the sector prior to implementation of the revised fees and the short notice provided before the changes came in to effect.
- 4.3 It was acknowledged that the changes had been implemented over a relatively short timescale, and therefore Committee agreed that further consultation with stakeholders would be carried out in advance of any further changes being made to the scheme.
- 4.4 Officers further engaged with the relevant companies and guides at meetings in November 2023 and January 2024. These meetings explored the possibility of making revisions to the scheme early in 2024. It was also explained to stakeholders

that any changes to the fee structure could not lead to a reduction in income, or make the scheme overly complex to operate.

- 4.5 Further to the engagement sessions, stakeholders were sent an email (Appendix 1) asking for comments on four options for revising the scheme:
- 4.5.1 Option 1 - No change to the fee structure; fees would be annually updated in line with the Council's budget decision on whatever percentage increase applies to all fees. If Council agreed a 5% increase on fees - this would make a tour guide individual registration £126 and a business registration £157.50.
- 4.5.2 Option 2 - Introduction of a tiered structure of fees for businesses based on number of tour guides. Individual tour guide registration would remain at £126, two-10 guides £157.50, 11-15 tour guides £175, 16 and more tour guides £225.
- 4.5.3 Option 3 - Tiered approach based on footfall. This would require all individual tour guides and businesses to share up-to-date figures on an ongoing basis, and also to provide data for the previous 12 months on an annual basis.
- 4.6 Stakeholders were also asked for comments on a proposed single monthly registration for August. This would be based on the cost of administering such a system - the estimate at that time was £65 per individual tour guide or business based on equivalent costs when issuing an identification badge for certain licence holders.

Feedback from the Consultation

- 4.7 At the first consultation meeting in November 2023, the suggestion was that a fee based on footfall would be preferable. This was explored in further detail in the January 2024 meeting. Methods to do this were discussed and broadly these were:
- 4.7.1 Controlling access to the cemeteries via physical infrastructure or having Council staff managing access;
- 4.7.2 Use of technology to allow easier donations by individual visitors; and
- 4.7.3 Tour companies and Guides declaring visitor numbers on a confidential basis with charges applied pro rata.
- 4.8 A note of each meeting is attached at Appendix 1 and all emails received in response to the request are attached at Appendix 2. The responses broadly argue for a return to previous arrangements where large organisations (such as Scottish Tourist Guide Association) should be able to register all guides who are part of the association for one company fee, or support Option 1.
- 4.9 It is clear that, whilst there is concern about the current fee structure, there is no real consensus on what changes could be made to address these concerns. Typically, those guides who either take tours into the cemeteries infrequently or with

very small groups argue that it is unfair that they should pay the same fee as larger operators, or operators who take tours more frequently.

Footfall

- 4.10 When considering a fee based on footfall it should be noted that there were no positive responses to the questions: would the guides/companies be prepared to a) share numbers on a confidential basis, and b) provide an estimate of these.
- 4.11 The alternatives of putting in place physical infrastructure and/or staff controlling access are not recommended as viable at this time. Leaving aside the heritage and planning restrictions of installing physical infrastructure, the capital and staff costs would be significant. Such costs would have to be passed on to the operators and guides, and would be likely to add to concerns.
- 4.12 Further work is being conducted into a conservation management plan for Greyfriars Cemetery, and this will need to consider the sustainability of current visitor numbers. Whilst the issue of large footfall affects all five cemeteries in the scheme, the problem is most acute in Greyfriars. This work is expected to result in a report later this year that would allow the Council to consider the sustainability of footfall in terms of the ongoing impact on the cemetery and any measures needed to manage this.
- 4.13 Officers have had discussions with colleagues in Customer about whether there is an available technology solution which would make taking payments from visitors more practical and effective. This work is ongoing and will be reported to Committee as specific solutions are identified,
- 4.14 Therefore Option 3, a fee based on footfall, as suggested at the consultation meetings with tour guides is not recommended as viable at this time.

Tiered Structure

- 4.15 This was suggested as an option that might be simpler to implement than the 'footfall' option, but could go some way to address the concern that bigger operators pay more. Support for this option was limited.
- 4.16 Whilst acknowledging the concerns of guides who visit the cemeteries infrequently or have only small groups, it would not be practical to seek to reflect that type of use in the fees. This is because the range of possible scenarios is large, which would make trying to reflect those in a fee structure unduly complicated and difficult to enforce. The cost of administering the scheme and issuing a pass is the same, irrespective of the size or frequency of use, and the core costs have to be recovered. It is therefore not proposed to implement Option 2.

Conclusion

- 4.17 As a result, it is proposed that the current fees should be updated based on the decisions of the Council on percentage uplift for fees and charges. This would take effect from 1 April 2024, and existing guides will be required to renew their registration by 1 July 2024.

- 4.18 It is recommended that a pass for August should be introduced to reflect the importance of that period and to cater for any guide who does not wish to pay for an annual pass. The fee would be £65 and would be subject to the same annual increase as other Council fees and charges. It is not recommended that monthly passes are made available more generally, as these would be a challenge to administer and the service is not resourced to provide this additional work.

5 Next Steps

- 5.1 If the recommendations are agreed, officers will arrange for stakeholders to be informed of the revised Cemetery Tour Guide Registration Scheme. Monitoring of compliance with the scheme and of the income received will continue.
- 5.2 Officers will continue to progress the actions set out at paragraphs 4.12 and 4.13 and will report back to Committee once these are complete.

6 Financial impact

- 6.1 The revised fee structure has generated £49,350 in the current financial year. This has addressed an immediate funding pressure to meet the cost of the Cemeteries Officer position (which is deployed to manage the five city centre cemeteries).
- 6.2 During the current financial year, no capital works have been undertaken. However, there remains a risk that capital works will be required.

7 Equality and Poverty Impact

- 7.1 There are no issues directly relevant to equality or poverty arising from this report.

8 Climate and Nature Emergency Implications

- 8.1 The report does not have an impact on any issues relating to the climate or nature Emergency.

9 Risk, policy, compliance, governance and community impact

- 9.1 Engagement with operators has been carried out, as reported at paragraphs 4.4 to 4.6 above and in Appendices 1 and 2.

10 Background reading/external references

- 10.1 [Report](#) to Culture and Communities Committee 15 May 2020
- 10.2 [Report](#) to Culture and Communities Committee 5 October 2023

11 Appendices

- 11.1 Appendix 1 – Notes of meetings 6 November 2023 and 10 January 2024
- 11.2 Appendix 2 – Email responses received

Appendix 1

Tour Guide Registration Scheme Consultation Session 6th November 2023

City Chambers Edinburgh

Meeting Notes

In attendance

Council officers – Jane Matheson, Bereavement Services (BS) Catherine Scanlin (Licensing) Charlotte Golledge (BS) John Lawson (Archaeology)

Organisations/Individuals Represented:

- Kirkyard Consulting
- Scotland City Tours
- Napier Tours of Scotland
- City of the Dead
- S.T.G.A
- Visit Scotland Tours
- Tu Gupta en Escorial
- Wee Ecosse
- Edinburgh Expert Walking Tours
- Hidden Scotland
- That Guide With Glasses
- See Your City
- City Explorers
- Brujula Free Tours
- Mercat Tours
- Somos Escorial
- Potter Trail
- Edinburgh Walks.com
- All Star Guides
- Independent Guides.

Meeting was opened by Catherine Scanlin with housekeeping and an overview from Licensing including the passes.

- Update from BS from Jane Matheson, scheme has had a successful start, raising circa £45,000. Improvements and upkeep of the new flower beds and statue in Greyfriars have taken place. The salary of the Cemetery officer was discussed;
- Catherine Scanline and tour guides had a discussion about the wording on the permits; whether tour guide or cemetery tour guide was preferable and did not give the impression that 'cemetery tour guides' were endorsed by the Council.

- Concern was raised regarding tour operators from other countries touring in the 5 city centre cemeteries. Visit Scotland are actively trying to identify and inform non UK based tour groups.
- Discussion was started about pay per visit to be made available or even part year payments as before. It was agreed a staggered fee system could be considered when reviewing the fees.
- John Lawson (Archaeology) declared that the fees paid by guides only made up a small percentage of the annual cost of conservation. CEC pay out much more and the tour guide fees are an assistance rather than cost covering.
- Discussion continued onto guides regulating each other as it was considered a one size fits all approach is problematic. Jane Matheson said that the CEC could facilitate a meeting for guides and that information training from a local enthusiast could be a way to help share information.
- Group size was discussed. Some want smaller, others want to keep it the same.
- Old Calton and antisocial behaviour was raised. Jane Matheson reiterated what Charlotte Golledge has been advising guides that they must report all antisocial behaviour to the police at the time or as close to the time afterwards. Cemetery Officers and Enforcement do not have the powers to remove these individuals, only the police do. Problems with rubbish etc and how to report in was discussed.
- Point raised about training passes. Some guides may start out training but decide not to become a guide and therefore the cost of the permit is wasted.
- Requests made that Greyfriars is looked at separately as considered a tourist destination and not just for tour groups. Susan Buckham's role in creating a Conservation Management Plan was raised and the guides made aware of what this was.
- Request that a path is put in the west yard from Thomas Riddell's grave as the ground is being destroyed.
- Requests for more donation points, however Jane Matheson explained the reasons behind why the CEC are limited to where points can be located.
- A discussion was had about two different passes on a sliding scale however some guides pointed out that it is difficult to forecast numbers as tourism is a complex business that is effected by not only the time of year but also weather.
- The problem of mobility for wheelchair users in the Canongate was raised due to the stones put in.
- Conservation and buddleia problem was raised. John Lawson was able to explain the current way the CoECCEC was dealing with the vegetation.

City of Edinburgh Council (Bereavement Services)

Dear Tour Guide

Tour Guide Feedback

Thank you for those people who were able to attend the meeting on 10 January 2023.

Please find the notes of the meeting below including the proposals, as agreed, to seek feedback on the fee structure which will be reported to the Culture & Communities Committee.

Kind regards

Jane Matheson

Bereavement Services Operational Manager | Regulatory Services | Sustainable Development Directorate of Place | The City of Edinburgh Council | Mortonhall Crematorium, 30b Howdenhall Road, Edinburgh, EH16 6TX

NOTES FROM 2nd TOUR GUIDE CONSULTATION MEETING

Wednesday 10 Jan 2024

Present from CEC:

- Andrew Mitchell, Head of Regulatory Services
- Catherine Scanlin, Licensing Manager

Apologies:

- Jane Matheson, Bereavement Services Manager

Introduction

- We agreed to look at the fee structure
- There are different types of operators within the Tour Guides
- No consensus on alternative proposition
- Focus of this piece of work are the 5 historic graveyards:
 - New Calton
 - Old Calton
 - Greyfriars
 - St Cuthberts
 - Canongate
- Costs incurred by commercial activity unacceptable to come out of CEC budget
- Seeking to find a solution
- Agreement that donation points not working
- CEC are looking for feedback on this year's fees in particular however this is part of a long term plan to find a solution

Further Notes

The challenge for CEC is how to maintain access to 5 historic graveyards. There are 43 graveyards in total that the Council are responsible for and are required to invest to carry out capital works, cover the costs of enforcement and inspection costs and this is currently carried out by one dedicated enforcement officer, a city centre team of 4 and the wider enforcement and licensing services.

Position one year ago was unsustainable as donations were low and income less than £5000 however introduction of permits generated £45k which contributed to a small percentage of the costs.

We undertook to carry out a piece of work to see if the system could work more fairly.

An explanation was given about using the feedback from the tour guides to submit as part of a report to the Culture & Communities Committee who are the decision makers regarding fees.

Questions from audience

- There were a number of questions regarding what data did CEC require to calculate footfall and corresponding fees.
- Question regarding fairness of small operators paying the same as large operators
- Could the Council approach this in similar way to a business plan with a more radical approach
- When would Cemeteries Management Plan work be completed and what impact will this have on future work
- Could pre-booking work for Greyfriars (similar to Edinburgh Castle)
- No evidence of enforcement taking place therefore what are we paying for?
- Need additional enforcement staff to ensure compliance
- Sustainability was the key theme about how to work out a plan for the future which balanced the care of historic graveyards, costs of upkeep/maintenance, visitor numbers and commercial activity creating additional costs by increasing footfall.
- Could the Council charge per visitor?
- Could the Council build a structure to collect cash?

- Could the collection points be better located?
- Tour guides want enforcement action to take place
- Could the Council add signage to the graveyard asking people to stay off the grass?
- A suggestion was made that weather causes more damage than footfall

Next Steps

Council to send out 3 options and notes from the meeting.

Tour guides invited to submit their feedback on options or alternatives in the next two weeks:

3 options for this year

Option 1

No change to the fee structure and the fees would be updated in line with the Council's budget decision for whatever percentage increased applied to all fees. The figure officers are currently working to is 5% and this would make a tour guide individual registration £126 and the companies/businesses £157.50.

Option 2:

To introduce a tiered structure for fees for businesses based upon number of guides.

Individual guide would remain £126, 2-10 Guides £157.50, 11-15 guides £175 and 16 and above £225.

Option 3:

Consideration of tiered approach based on footfall. For this to work all guides and businesses would need to be prepared to share in confidence up to date figures on an ongoing basis. Therefore would each respondent a) be willing to provide such

data on an ongoing basis and b) provide data for the previous 12 months in reply.

Council would also give willingness to introduce a monthly registration for the month of August, this would be based on the cost of producing such and the estimate would be £65 based on equivalent licensing cost.

**Feedback should be submitted to
bereavement@edinburgh.gov.uk**

You have received this email as you provided your email address as part of your registration application to the City of Edinburgh Council so we could contact you about your registration and provide related updates.

Appendix 2

From: [REDACTED]
Sent: Saturday, January 20, 2024 2:28 PM
To: Bereavement <bereavement@edinburgh.gov.uk>
Cc: Val Walker <Cllr.Val.Walker@edinburgh.gov.uk>
Subject: 2nd Tour Guide Consultation Meeting 10th January 2024 - FEEDBACK

2nd Tour Guide Consultation Meeting 10th January 2024

Led by Andrew Mitchell and co-ordinated by Catherine Scanlin

FEEDBACK AS REQUESTED

You will note that I have copied in Councillor Walker, as she is to my understanding Convener of the Culture and Communities Committee, which is the body that will make the final decision in this matter.

The Bereavement Services email dated 16th January states that it was agreed the fee structure be looked at, and that feedback was sought reference fees on tour guides for season 2024.

Under Questions from the Audience in said email, it states 'no evidence of enforcement taking place therefore what are we paying for?'. This was my question. What I said was specified as relevant to 2024, "why should we bother paying?" in that scenario.

TEXT REDACTED AS IT CONTAINS DETAILS OF INDIVIDUALS OR BUSINESSES

[REDACTED]

The same section of The Bereavement Services email states;

- Could the Council charger per visitor? - in my view that is a pipe dream. There is no way all tour operators are going to declare their annual footfall of guests. For that reason, I will not be doing so either, even running a small operation as an independent, freelance tour guide.
- Could Council collection points be better located? - Yes! Andrew Mitchell's position that the Council could not erect a simple, vertical card payment entry pillar for tour guides to tap with their - digitally linked to their bank accounts - licence cards 'because it is a UNESCO World Heritage site', I strongly refute. It did not stop a big Amazon Prime type smile sign with Edinburgh City Council and a controversial statue to Greyfriars Bobby being positioned near to the little dog's grave, or the existing donation machines. ECC have already blown that position out of the water. To further facilitate this, I strongly recommend permanent locked closure of the bottom gate into the graveyard.
- Tour Guides want enforcement to take place. Indeed we do! 2023 saw very sporadic, token enforcement. All I witnessed was several guides pooling more revenue that myself receive were verbal warnings evidence provided they ignored, and were allowed to continue their tours.

OPTIONS FOR THIS YEAR was the final section of the email from Bereavement Services.

As an independent, one person band, independent freelance tour guide, my understanding of option one is that I would pay £126 for season 2024, based on the projected 5% increase to fees. Please clarify that my understanding is correct.

The final paragraph of the third option willingness for a monthly licence will only be considered for the month of August. I would strongly recommend that you consider a licence for each of the months March to October inclusive. The graveyard is impractical for winter use, due mainly to the effect of winter weather. I therefore put my position, that a monthly licence purely for the month of August is unreasonable. Further, that it is unfair this would in reality force guides to pay for an annual licence, when tours in Greyfriars especially are only practical in the stated months.

Thank you very much for your valuable time in considering my requested feedback.

As a final suggestion for consideration not covered in this meeting, all parties working for and acting as representatives for Edinburgh Council with direct involvement in this matter, may feel it prudent to consider that tour guides advise customers how to properly conduct themselves in a graveyard, not least in terms of health and safety.

Especially if there is no monthly option available for each of the warmer months, many guides may decide to pay the licence fee no longer, temporarily stop their groups at the main gates, thereby creating congestion. Furthermore, this then allows customers, in the absence of their tour guides, to - *for want of a better phrase* - run riot in the graveyard.

Surely this is not a scenario the Council would wish created.

Thank you for considering my further suggestion.

I look forward to hearing further from Bereavement Services and Councillor Walker.

Warm regards,

[REDACTED]

[REDACTED]

[REDACTED]

From: [REDACTED]

Sent: Saturday, January 13, 2024 1:19 PM

To: Bereavement <bereavement@edinburgh.gov.uk>

Subject: Annual passes for tour guides at cemeteries in Edinburgh 2024

Hi,

Following on from feedback from other colleagues who could attend the meeting on the 10th, I'd like to add my voice.

I only applied for a pass last year as one specific group (of 28 people) I was working with wanted to visit to see the graves of important Scottish enlightenment figures.

Prior to this I just avoided the graveyards once the pass was put in place. It is not worth the fee.

It is not a proportionate fee.

On that visit and subsequent visits with individuals or pairs no one checked or challenged me regarding guiding in Greyfriars.

If a charge has to be put in place, then

a) it should be proportionate per head, and b) it needs to be policed.

I took in that group of 28, and possibly 10 other visitors over the whole guiding season.

It makes no sense that designated Harry Potter tours, graveyard tours etc bringing people every day pay the same.

Please sort this out.

Regards

[REDACTED]

[REDACTED]

From: [REDACTED]
Sent: Wednesday, January 10, 2024 10:14 PM
To: Bereavement <bereavement@edinburgh.gov.uk>
Subject: Cemeteries Pass scheme feedback

I am a qualified tourist guide who works mainly further north and might want to take visitors through Greyfriars maybe once or twice a year. When the scheme membership was through STGA that was fine. Now I have to turn down jobs where visitors want to visit an Edinburgh cemetery because it is not financially viable for me to get the pass.

I feel very strongly that cost should be proportionate to use. You will lose a large potential for high volumes of small revenue income from the scheme with the current arrangement. Guides will suggest other places of interest if they cannot take guests in. Unsupervised guests are less likely to contribute than those who are being encouraged by a guide to do so (in addition to the guide pass).

The large organisations who run thousands of tours through the cemeteries every year and make money through fees or tips should be paying the lion's share of what you need to take in. Anything else will provide a dwindling return.

For me, where before I might previously have suggested a cemetery if it coincided with guest interest and then asked them to donate towards upkeep as I do in churches, I am taking my guests elsewhere because the scheme as it currently stands does not recognise the actual annual use I would make of the pass or the fact that the current charging structure makes it completely unviable for me financially.

I hope that this is a helpful contribution to the continuing discussion.

Regards

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

From: [REDACTED]
Sent: Thursday, January 11, 2024 8:32 AM
To: Bereavement <bereavement@edinburgh.gov.uk>
Subject: Cemeteries Pass

Good morning

I understand that you are asking feedback re application of cemetery pass.

I am an STGA blue badge guide operating across Scotland.

I fully understand the reasoning behind the introduction of the passes to manage footfall, however i disagree with its application.

There has obviously been a significant increase in numbers visiting, many driven by the Harry Potter story. Many of the guides who bring groups in are not trained, and bringing groups that are simply too large, all visiting the same spots and frequently lingering far longer than required to stretch out their tours. Guides like myself visit the cemetery as part of a tour of the city, or indeed the country. We tend to have couples or family sized groups. In most cases we are focussing on different aspects of the history of the cemetery (Covenanters, medicine, famous people), rather than the fantasy element.

As we are not bringing hundreds of people a year, nor visiting every day, but this simply not financial viable for us to buy a pass at £150 for the numbers I bring. As such, I have had to omit one of the most interesting parts of a city tour for the past season.

Please note:I have no objection to paying an entrance fee for guests, on a pro rata basis, and always ensured I used the card reader machine, however I feel the current system is too crude and actually cuts out the trained guides who are not the ones causing the problem

I would suggest that a fairer system might be to have top levels of pass. One for occasional users who take groups of up to six people, which could be a lower rate. One for the regular large groups. (The frequency would sort itself out by the size of group).

Alternatively, charge a fixed price per head. Given the numbers visiting, this should be enough to employ staff

Thank you for taking the time to read my comments

From:
Sent: Thursday, January 11, 2024 7:22 AM
To: Bereavement <bereavement@edinburgh.gov.uk>
Subject: cemetery pass

Good day,

Via our STGA site I understand you are looking for further feedback. I have in total entered Greyfriars kirkyard twice with a group in the last season. I explained, I had no official pass for guiding in the graveyard so I would be silent until we got into the building. I don't like graveyards and find Greyfriars jamboree totally repulsive with a lack of decorum. I do understand you are incurring extra costs due to the large groups stomping across graves but there should be a way for me to take clients to the church without being accosted by the guard on duty. I don't think you considered this problem.

With kind regards



From: [Redacted]
Sent: Tuesday, January 16, 2024 6:47 PM
To: Bereavement <bereavement@edinburgh.gov.uk>
Subject: Entry scheme is 3 poor propositions

Option 1.

Tour companies extracting millions from Edinburgh and sending it over the horizon are going to pay £30 more for the privilege of coming into our graveyards. This is regressive.

Option 2.

Once again a massive premium for being an individual guide, you can have 10 guides for £30 more. Once again favouring big business, in the main none of them are based here and in the main their guides earn little, so you're protecting 'employers' who have simply engineered poverty. Their guides are beneath the poverty line and pay no income taxes. Millions are made! You're betraying us.

Option 3.

OMG! Well all the multinational Potter tours, That's

1. Sandemans
2. Get Your Guide / See Your City
3. One Child.org

All ran tours illegally over the pandemic. Potter Trail did too, albeit to half the degree.

I've been swindled by the top two, faced harassment due to 1 and 3 duplicating my tour and then filling their customers with sh**. These companies do not behave in an upright manner. They can't be trusted.

You need to do the work to put turnstiles in and charge everyone. Set it at a good whack and you can motivate independent visitors to instead take a tour. It'll generate a lot of revenue for the multinationals. We, the guides and people of the city, won't see much of it, but at least CEC can get paid.

A considerable amount of erosion is being caused by unescorted visitors, so charging all is highly justifiable.

What about Greyfriars Kirk? Stuff their mouths with a cut.

All your options are poor and slant the table to big business. Very few of the guides entering Greyfriars make any money, perhaps just Potter Trail's guides earn a living and for the rest it's a life style job.

By not charging you are betraying the city, and betraying the benefit of world heritage to the city.

Beggars belief.

Please forward this to associated councillors, so they can get behind benefitting the city in future. The city has a lot of problems, and prosperity is there to combat them. The council just needs to decide to put the people of the city first, not disease spreading, poverty driving multi-nationals.

x

From: [REDACTED]
Sent: Wednesday, January 10, 2024 9:17 PM
To: Bereavement <bereavement@edinburgh.gov.uk>
Subject: Feedback on tour guide cemeteries pass requirement

Good evening

My Edinburgh based colleagues have told me that you are looking for feedback on the cemeteries tour guide pass.

I am based in Pitlochry but have maybe 5-10 tours in Edinburgh per year that involve a trip to Greyfriars Cemetery or walking down through Calton cemetery to get to Palace of Holyroodhouse. I spend maybe 10, maximum 15 mins on each occasion in the cemetery with between 2 and 10 people.

I pay for Historic Environment Scotland and National Trust for Scotland memberships as I believe that as I make money from tourism, I should contribute to the organisations that enable me to carry out my profession.

Whilst I am happy to pay to have access to / via the cemeteries,

I feel that the fee is excessive for the amount of visits and number of guests that I guide. To give you a comparison, the annual subscription I pay to Scottish Tourist Guides Association is £310 and for this I get an entry on the official website with work queries emailed to me, office support and annual public liability insurance.

Please could you look into a tiered system of payment levels based on the number of visits and number of guests that are taken in by each company or individual guide. Obviously the regular Harry Potter tours of 30 people several times per day will have much more of an environmental impact than taking in 2-10 guests at a time and should therefore pay more.

I look forward to hearing the outcome of your review.

Kind regards

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

From: [REDACTED]
Sent: Thursday, January 11, 2024 3:37 AM
To: Bereavement <bereavement@edinburgh.gov.uk>
Subject: Guiding in Edinburgh's cemeteries

Dear Sir/ Madam

I am a qualified freelance Blue Badge tourist guide working in Scotland, North East England and Yorkshire. I work with individuals and groups organised by agencies from all over the world.

I am occasionally called upon to provide walking tours in Edinburgh.

It is often at my own discretion, but sometimes I may be asked to take a small group through Calton Cemetery on the route.

I understand the reasoning behind making a nominal charge to offset any additional costs to the cemeteries for maintenance, but it seems very unfair that I would be expected to pay the same amount as a large company who might take a group in every day, amounting to hundreds or thousands of visits throughout the year.

At present those of us who guide a dozen or so or so visitors a year pay the same as a tour company that takes in thousands.

Please can I ask that this is taken into consideration in calculating the charges. For the meantime, I am now unable to include any of the Edinburgh Cemeteries on my tours,

Yours Sincerely

[REDACTED]

[REDACTED]

From: [REDACTED]
Sent: Sunday, January 21, 2024 3:01 PM
To: Bereavement <bereavement@edinburgh.gov.uk>
Subject: Historic Graveyard Permit Scheme

Hello,

I am a qualified STGA Blue Badge guide and an occasional visitor to a few of the historic cemeteries when guests request it. I did have a free permit when these were available but could not justify the current fee due to the small number of visitors that I take there.

I am more than happy to pay a fee to be able to enjoy these remarkable places but the fee structure at the moment is not proportionate and fair, nor is the proposed fee structure as discussed at the recent review meeting.

Although other burial sites are covered with the pass, the most visited is Greyfriars where the damage is requiring most attention.

I take up to 20 people into the sites per year. It seems disproportionate and very unfair to charge someone with a footfall of 20 people the same as companies taking thousands of visitors around the sites annually.

As the charge is to contribute to repair and maintenance, this overall charge doesn't reflect a fair approach for the occasional user compared with companies running multiple daily bespoke tours.

If you adopted an entry charge for each individual being led on a tour, perhaps by employing staff selling tickets, with the hundreds of thousands who visit Greyfriars Kirk yard in a year, this would be a huge monetary resource that could be put towards the maintenance and repair of the graveyards.

City of Edinburgh Council could set up mobile tickets booths if permanent structures are not allowed or partner with Greyfriars Kirk and the Grassmarket Community Project to have a ticket/entrance fee facility close to both main entrances with appropriate signage directing people to pay the fee/donation/contribution before entering.

Other cemeteries adopt this approach to make the visitors experience more meaningful and it could easily be adapted to suit Edinburgh with a fee function included.

A cargo bike with 3 wheels with tourist information is present throughout the summer at the main entrance of the Père Lachaise cemetery (at the hemicycle level). Visitors can pick up maps in French and English and scan a QR code that provides them with a list of official guides offering guided tours of the cemetery.

Sadly at the moment the donation points are inaccessible, poorly signposted and usually not working.

The other major issue with large group themed tours because the tour is focused on Greyfriars, Harry Potter, Ghosts etc., often not part of a city tour and the guides invariably stretch the tour out for a lengthy period to offer so called 'value for money'. The result is that they hang about endlessly, talk very loudly and hog the key locations. A similar situation has happened in Edinburgh Castle this year with 'free Guides' and it does not enhance the visitors experience at all.

Hopefully this situation can be resolved so responsible qualified guides can showcase these wonderful community spaces to visitors from all over the world who are keen to be part of sustainable tourism.

Kind regards

██████████

████████████████████

From: ██████████
Sent: Wednesday, January 17, 2024 2:40 PM
To: Bereavement <bereavement@edinburgh.gov.uk>
Subject: Re: Tour guide consultation on fees

Hi,

I am writing because at the most recent meeting there was said to be a period of consultation of tour guides. From what I got from the meeting we were to be sent a form but not such form has been received. If I may give feedback here I would be much obliged:

As a freelance tour guide, I would say I prefer plan 1 (same fee raised with inflation) or plan 2 (tiered) but with an addendum. The fee should be increased above inflation so that the scheme brings in enough money for enforcement plus maintenance. The fee could be lower for guides that do smaller tours as opposed to those who do larger but I see a problem with enforceability in that you'd have to have different license colours and registers, and people might try skirt it by paying for a cheaper license while doing larger tours on occasion. Plus I think it really depends on the year, as well as the hours worked

which is variable, as to how many any individual gets in a whole year. This is why I prefer a flat fee rate as it is easier to enforce, it is easier to pay, basically the current system but with a higher fee to bring in more money.

It's also about proportionality. Some of the guides who bring in small groups make much more money per guest than the guides who bring in larger ones, for instance those on the free model. The free model tours are providing a great service to the graveyard in that these tours ensure huge numbers of guests follow the rules. In the event of a footfall fee, this model would struggle to break even, but the same number of guests would be going in without anyone policing their behaviour.

As a volunteer and member of the Friends of Greyfriars I can tell you the main damage to the graveyard is not purely from feet. A large part of it is underinvestment in the graveyard. This is understandable as the council lacks money. What it needs is more funding, and signage to encourage guests to be better behaved and to donate more. The graveyard will not receive more money nor fewer visitors from an untested footfall fee. It will simply keep tourist numbers the same but reduce rule following behaviour. The only way to ensure the graveyard gets more money is to charge all tour guides an appropriate fee, while ensuring they uphold the rules and are aware of their role as custodians of an essential place of Scottish history.

Thanks,

[REDACTED]

[REDACTED]

From: [REDACTED]
Sent: Thursday, January 18, 2024 9:34 AM
To: Bereavement <bereavement@edinburgh.gov.uk>
Subject: Re: Tour Guide Feedback

Hello folks

My first choice would be Option 2 then Option 1

Kind regards

[REDACTED]

From: [REDACTED]
Sent: Tuesday, January 16, 2024 7:57 PM
To: Bereavement <bereavement@edinburgh.gov.uk>
Subject: Re: Tour Guide Feedback

Hi there,

Really appreciate you sending this on. I would be inclined to vote for option 2.

If you need anything else from me, please let me know!

Thanks,

[REDACTED]

[REDACTED]

[REDACTED]

From: [REDACTED]
Sent: Wednesday, January 17, 2024 10:08 AM
To: Bereavement <bereavement@edinburgh.gov.uk>
Subject: Re: Tour Guide Feedback

Good morning,

As you know I couldn't attend the meeting as I got Covid. Are a couple of options implying that the annual fee for an individual guide would go from £150 to £126? Also why as a sole trader I am punished and obliged to pay 150 or 126 (whatever is the fee you suggest) and a big business using tens of "guides" has to pay only £225. Why cannot the Scottish Tourist Guides Association pay a fix fee for all the guides just like businesses do? We are the ONLY official and accredited guides in Scotland and there is NO recognition from the Council.

I look forward to hearing from you,

[REDACTED]

[REDACTED]

From: [REDACTED]
Sent: Wednesday, January 17, 2024 4:52 PM
To: Bereavement <bereavement@edinburgh.gov.uk>
Cc: [REDACTED]
Subject: Re: Tour Guide Feedback

Good Afternoon

From our company Option 1 or Option 2 are reasonable for increases of pricing as well as scaling for size of company with it being a simple increase with increasing number of guides at a company. Discussions of varying rates to better scale from individual operators to larger companies could be worthwhile.

We would be staunchly against option 3.

I believe Option 3 has been discussed before the current scheme and was dropped as it becomes a costly process in both time and resources for both the companies and I

imagine the council to keep up to date with providing and auditing the visitor numbers data as well as out on site.

Best Regards,

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

From: [REDACTED]

Sent: Friday, January 19, 2024 9:47 AM

To: Bereavement <bereavement@edinburgh.gov.uk>

Subject: Re: Tour Guide Feedback

Good Morning,

As an individual tour guide, I bring in perhaps 7 couples, and 10 larger groups (6-20pax) to the graveyard each year. The majority of my tours throughout the season do not go into the graveyard, but I feel a little like I am being held to ransom by the council in having to pay for a pass for the few tours I do take there. It seems particularly unfair that I am charged the same price as companies that take in large groups every day. As a self-employed individual, this is a large cost, and sets a dangerous precedent. Imagine if it was extended to public parks, museums, and then into other council areas as well. It would become a cost that individual self-employed tour guides, who guide throughout Scotland, could not shoulder.

I don't agree with charging admission to otherwise public places, but if the council continues to charge fees, I believe a tiered system should be considered, and the cost for individual tour guides **lowered** from £126 to something more reasonable.

Kind regards,

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

From: [REDACTED]
Sent: Monday, January 22, 2024 10:34 AM
To: Bereavement <bereavement@edinburgh.gov.uk>
Subject: Re: Tour Guide Feedback

Dear Bereavement Services,

Many thanks for the notes following the Tour Guides meeting and my apologies for not being able to attend.

My feedback is as follows:

- As a sole-trader who only takes small groups of maximum 8 people (usually less) I would prefer Option 3.
- If Option 3 were implemented I am happy to provide visitor numbers.

Further thoughts:

- Could the Council seek to introduce a limit tour group sizes?
- Could the Bereavement Services get a slice of the proposed 'tourist tax'?
- Could some of the larger tour companies provide a 'duty-guide' to help monitor use/numbers, etc within Greyfriar's?

Finally, I just want to say that, as a resident, local historian and tour guide, I really appreciate the fact that our historic graveyards are open and free to access. They're amazing places and I think you do an amazing job with very limited resources so thank you for all your hard work.

As a business I have decided to put £10 from every private tour into an annual 'donations pot' to share between selected local institutions/places that provide free access to Edinburgh's amazing heritage. The Bereavement Services is one of the groups I'd like to give a donation to, please could you let me know how to do this? Don't get too excited, I'm a small business so the sums involved aren't earth-shattering but I really do feel it's important to give back and I guess every penny helps.

With kind regards,

[REDACTED]

[REDACTED]

From: [REDACTED]
Sent: Wednesday, January 17, 2024 9:36 AM
To: Bereavement <bereavement@edinburgh.gov.uk>
Subject: Tour Guide Feedback

Hello,

I attended the meeting in January..I am an individual guide and was really disappointed with the three possible options..It seems that individual guides who may visit only occasionally are actually funding everything..

Now I know you are not asking for us to give you solutions as that was discussed but rather look at the three options.. At the meeting a representative of one large agency said we should just stick with option 1.. well obviously for them!

If you have a problem with enforcement and resources then why not ask every agency/company that uses Greyfriars to pay let's say a £1,000 a year and individual guides let's say a £100.????

Option 3 is ridiculous because the problem with greyfriars are large scale companies using greyfriars daily and contributing barely anything...

One thing I wanted to add to this feedback that wasn't talked about at meeting.. The big identification badge.. surely you can do something about that.. as it stands any unofficial guide with no experience can go around town with this badge looking as if he or she has got official permission from edinburgh Council to be a tour guide! This means the council looks as if it has sanctioned these people! The size of photo is way too big and there should not be edinburgh council on it.. why not a QR code???

Regards,

[REDACTED]

[REDACTED]

From: [REDACTED]
Sent: Friday, January 19, 2024 10:47 AM
To: Bereavement <bereavement@edinburgh.gov.uk>
Subject: Tour guide graveyard scheme feedback

Thank you for the opportunity to feedback on the cemetery tour guide scheme. I was unable to make the meeting on 10 January, but appreciate having the notes to send feedback on the proposals for the fee system.

As the issue of maintaining the graveyards is linked inherently to the number of people accessing the spaces, and as the donation points haven't been utilised (as the larger companies gave assurances they would be, in exchange for lower annual fees when the scheme was first set up) it can only be sensible to substantially increase the annual fee for those larger companies operating more guides who bring bigger groups into the cemeteries.

The means by which those levels are set may have to be based on companies submitting details of their annual (or monthly) visitor numbers, in confidence if necessary.

With reference to Greyfriars in particular, as a sole guide bringing small groups (5 or 6 people at most, on average) into the space a few times a week, I should expect to pay less than larger companies who operate multiple guides taking groups of 20+ people through the graveyard, multiple times a day. Clearly they are contributing more wear-and-tear to the space, and are also best placed to contribute proportionally more towards its upkeep.

Understanding the value of Greyfriars, for example, as a percentage of what is necessary for their operations might be another way to set the level of the fees for the permit. Some companies rely 100% on access to Greyfriars for their tours - I use all five of the historic

graveyards for less than 10% of my business operations. Couldn't that be a way to judge how much value companies place on retaining access?

It should be acknowledged that if the council were to decide no tours were allowed to access the graveyards, the Harry Potter and ghost tour companies would find their operations very much in jeopardy. They need to be cognisant of that in making their arguments to you.

So staggering the payment structure more heavily towards those larger companies seems to be the only credible solution for raising the increased revenue required.

BUT the scheme won't achieve its objectives (as it currently isn't) unless it is enforced. And in the times I've been in the graveyards over the past year, I haven't seen a single enforcement officer, EVER. Yet every time I have been in Greyfriars I have seen guides operating without the permit. They are not hard to find.

So the scale of the problem is considerable, and the council must acknowledge that substantial resources will be required to enforce the scheme if it has any chance of being effective. Relying on voluntary adherence to the terms is clearly not yielding the right level of results.

For example, on a basic information level, I don't recall seeing any detail on the terms or requirements of the scheme posted at the entrances to Greyfriars. How can companies (especially non-local operators) be expected to know of their obligations if there's no information at the location itself? It also does little to suggest the seriousness of the scheme if there's nothing that promotes it.

But again, even if there was a sign, the council needs to be better at enforcing the scheme for it to have any effect. Especially in the summer, when the influx of tours from external operators and Blue Badge guides reaches a peak, there has to be somebody stationed at the entrances to Greyfriars to enforce the access scheme, otherwise it is simply never going to work. If you can't commit to that enforcement, I don't think you can expect compliance. (On which note a monthly registration for August would be entirely pointless.)

And Blue Badge guides in particular need to know that they are obliged to pay for access. They tend to operate as if they are free of any external obligations except to the terms of the STGA - I know from friends who work in other sites that other visitor attractions have issues with Blue Badge guides behaving as if they are a law unto themselves, so their commitment to this scheme must be a particular priority for the enforcement team.

As a sole, independent guide, I have supported the ambitions of the scheme from the outset. I am paying the fee *and* making visitors aware of the request for them to donate (my website has the voluntary donation indicated as a condition of booking - does *any* other operator make that plain in their booking system?). But I resent doing so when I see no effort to enforce the scheme, and no visible effort to ensure that other operators are also complying - why should I continue to be the fool who pays, when so many guides (and companies) appear to be getting away without doing so? That only breeds resentment and frustration, and anger towards the council, when you need guides like me on your side to make the scheme work.

The way previous decisions in this matter have been made and communicated has done little to foster support from me, yet I remain supportive and committed to playing my part in

the system. Please don't take that support for granted - I need to see (and to believe) the council is meeting its obligations to me, as a permit holder, to keep my engagement.

I operate in as responsible, sustainable and ethical way as I think I can manage as a tour guide. I celebrate Edinburgh's history and heritage, and try to ensure that my operations minimise any negative impact on the physical city and the other people in it. And that includes the time I spend in the graveyards with visitors (which is only a small percentage of my time spent with groups overall).

I don't believe the Harry Potter tour and the ghost tours are celebrating spaces like Greyfriars in the way that smaller companies do. To my mind, they are exploiting the space and its cultural associations for vast commercial gain, without much consideration for their wider impact, and it's not unreasonable on that basis to expect them to factor a greater operating cost into their business models.

I look forward to continuing to support this scheme, but I would very much like to see the council step up its efforts to meet their obligations in terms of enforcement, to ensure the working relationship between independent guides and the council remains mutually supportive and beneficial.

Many thanks,

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██████████

██████████████████

From: ██████████
Sent: Wednesday, January 17, 2024 11:23 AM
To: Bereavement <bereavement@edinburgh.gov.uk>
Subject: Tour Guide permits

Hello,

I am aware this cemetery guiding situation has no easy solution, but it seems to me the tiered option does not reflect the main issue which is wear and tear from footfall per guide visit.

I am an STGA guide doing occasional walking tours for small parties of 2-6 people (never more than one visit per day), so would pay as one guide at £126 with limited footfall. A business with 10 guides bringing potentially larger groups (possibly twice or more per day) pays only £30 more for a vastly increased footfall. How does that reflect the additional footfall erosion and damage and contribute proportionately to its repair?

I feel strongly that businesses with multiple guides should pay proportionately to the **combined footfall** of their business

Kind regards,

██████████████████

From: ██████████
Sent: Wednesday, January 24, 2024 11:21 AM

To: Bereavement <bereavement@edinburgh.gov.uk>
Cc: Catherine Scanlin <Catherine.Scanlin@edinburgh.gov.uk>; Andrew Mitchell <Andrew.Mitchell@edinburgh.gov.uk>
Subject: RE: Tour Guide Feedback

Hello,

Thank you for hosting the tour operator consultations and the follow up email below. As requested a number of times, can you please add my email to your database to ensure I receive comms directly on this matter.

It was acknowledged that the 'preferred solution' in the room at the last meeting was the opposite of that concluded at the meeting on 6th November – a levy based on visitor footfall. This indicates the broad spectrum of business models, scale and owners' mindset and therefore the wide range of perceived solutions. This is the complex reality the CEC must work with as the current 'status quo'. I support your approach of sharing details on the options with a confidential vote on the preferred solution. This will allow a true reflection of all views rather than those just in attendance at a meeting. However, it will still be the case that the complex variety of stakeholders will produce complex and potentially contrasting results. Retro-implementation of policy can't avoid clash and opposition to change so it will need to be expected.

Option 2 - Business/Employee License: A considerable number of walking tour operators do not employ their staff. Therefore distinguishing and charging a license fee according to employer/employee isn't the most appropriate approach to match the operating models.

Registered businesses contribute to the economy via business rates, VAT and corporation tax which are not paid by small sole operators, whilst supporting local jobs – in Mercat Tours' case at Real Living Wage +. On a strategic level a levy based on business/employees also disproportionately harms those employers aligning with Fair Work practise which results in CEC action contradicting local and national policy.

Proportionality: Its clear the primary concern of CEC is the deteriorating condition of Greyfriars Kirkyard caused by the significant footfall, the majority of which is led by commercial businesses. CEC has rightly asserted that the range of license required to accurately reflect the variety of business models would be complex and unsustainable.

Therefore, in order to recoup the revenue required for maintenance then the levy/fee should be proportional to the footfall carried by each guide/business rather than the type/size of guide/business itself. Any other levy structure according to calendar year, turnover, business type or size would disproportionately charge those smaller operators of fewer, smaller tours in a limited season which include non-cemetery tours versus the larger, frequent operators of larger groups that visit cemeteries year-round.

Option 3 - In summary, the damage is caused by footfall so the levy should be tied to footfall. This case was made in detail by our solicitor Rosie Walker at Gilson Gray in June 2023.

Solution: Low cost, secure and effective software solutions are available and already in use by CEC. The Ringo software allows GPS tracking with secure account details which could register footfall. Without any infrastructure required a GPS code could be set up for each of the 5 key cemeteries. Each tour company/guide would have a unique account which they would login into when entering a cemetery to

register footfall in live time. CEC would then collect the fee per visitor registered to the operators' account at the month/quarter end. The only resource would be occasional spot checks to ensure compliance.

I'm pleased to learn there is a long-term view being taken on developing a 5yr+ strategy for cemetery management. I strongly advise that for 2024/45 CEC continue the existing model + inflation and, if voted through, any new model is implemented from 2025+. Any solution other than the current model cannot be effectively and accurately scoped in 5months and would be vulnerable to failure. I suggest investing appropriate time and resource to ensure any solution has the greatest chance of support, adoption and success.

As ever, happy to discuss further.

Regards,

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From: █
Sent: Wednesday, January 24, 2024 9:44 PM
To: Bereavement <bereavement@edinburgh.gov.uk>
Cc: █
Subject: Cemetary licensing . Blue Badge Guides.

Hi,

We have been asked to submit feedback, I hope this helps.

I write as a qualified STGA 'Blue Badge' driver and walking guide who has used the cemeteries on a regular basis since qualifying. They are a natural asset and a great way of introducing clients to our wonderful City. As a local citizen I love them anyway, and have on occasion litterpicked them, voluntarily. As a course, a typical half day walk starting in Princes St collecting the clients takes us up Waterloo Place to the Old Calton, where the monuments to Abraham Lincoln, David Hume and Thomas Muir plus others give key introduction to 18th and 19th C Scotland, then, after Calton Hill, it is normal to use New Calton (where one can introduce the 19th and 20th C and, of course infant mortality, builders, grave robbing and the Stevensons and Bryce if of interest) as a natural walkway to the Palace of Holyroodhouse. The Canongate is optional, but I like to use it to talk about for Adam Smith, James Smith, Burns and Fergusson.

If I start from the other end of town I generally will visit Greyfriars.

So it is almost essential that I visit these cemeteries on a walk. My clients are usually two, sometimes 3, rarely four in number. The only cemetery where I have been consciously overwhelmed by large, guided groups is Greyfriars, though Canongate pre- Covid was beginning to go that way.

My personal opinion/ advice is that you charge, but justifiably, for this access. I generally touch the card payment columns in Greyfriars; I paid for and submitted my application for the licence but did not receive same; it made no difference as I not once encountered observers over a whole season, only when they were practising in the week before the régime was due to start. I did, as others did, observe non-qualified guides using their licences to justify some sort of legitimacy elsewhere. We always wear our badges, and I would much rather we paid through our association, and used our carefully guarded and expensive badges as

evidence.

Quite a few of my colleagues start their tours elsewhere - Glasgow, Aberdeen, Inverness and include Edinburgh as part of their tour. I really do not see that over £120 is reasonable for the four or five times they may use the cemeteries. Use of our badge system would make this reasonable.

I maybe have up to 20 half day walks in a season - so £5 + odd for the privelege of walking through land (that I am already funding through my council tax, and don't mind) does not seem unreasonable, particularly if I knew it was directly helpful in the care of these fascinating places.

I do hope your final decisions are fair and offer essential restoration and maintenance.

I am sure you will find us constructive and helpful allies 8n achieving your aims,

Yours sincerely,

From: [REDACTED]

Sent: Thursday, January 25, 2024 9:10 PM

To: Bereavement <bereavement@edinburgh.gov.uk>

Subject: Re: Tour Guide Feedback

Dear Ms Matheson,

Thank you for your email. I am very much in support of your scheme. My only concerns are fairness and consistency. I would be grateful if you could provide answers to the following questions:

According to the notes from the meeting the fee *will remain* £126 for an individual guide. I am such but last year on the 5th July I paid £150, the price given on the application form. Did I miss something? Please explain.

Given that I bought a permit and was given a badge in July, does this not last until July 2024? I do walking tours for the Balmoral, very often 2 - 4 people. I do not work past the end of October. This means I paid £150 for 4 months access. That doesn't seem fair.

As I said, I support your scheme. I'd simply like to know when my permit needs to be renewed, how long it will last and how much it will cost.

Yours sincerely,

From: [REDACTED]

Sent: Thursday, January 25, 2024 8:35 PM

To: Bereavement <bereavement@edinburgh.gov.uk>

Subject:

Option 1

Many Thanks

[REDACTED]

From: [REDACTED]

Sent: Monday, January 29, 2024 8:13 PM

To: Bereavement <bereavement@edinburgh.gov.uk>

Subject: Tour guide feedback re touristic use of Greyfriars Kirkyard and other historic Edinburgh graveyards

Dear Madam/Sir,

I am writing to provide feedback about the proposed plans to manage the tour groups access to the Greyfriars kirkyard in Edinburgh.

As a freelance tour guide, I would say I would prefer plan 1 (same fee raised with inflation) or plan 2 (tiered) but with an addendum. The fee should be increased above inflation in order that the scheme brings in enough money for enforcement plus maintenance. As per plan 2, the fee could be lower for guides that do smaller tours as opposed to those who do larger but I see a problem with enforceability in that you'd have to have different license colours and registers, and people might try avoid it by paying for a cheaper license while doing larger tours on occasion. Plus I think it really depends on the year, as well as hours worked, as to how many any individual gets in a whole year. This is why I prefer a flat fee rate as it is easier to enforce, easier to pay. Basically the current system but with a higher fee to bring in more money.

Moreover, some of the guides who bring in small groups make much more money per guest than the guides who bring in larger ones, for instance those on the free model. The free model tours are providing a great service to the graveyard in that these tours ensure huge numbers of guests follow the rules. In the event of a footfall fee, this model would struggle to break even, pushing the tour guides to simply not bring their managed groups to the graveyard and instead recommending them to visit it, bringing the same number of guests in without anyone policing their behaviour.

After many years of visiting the kirkyard and about 5 of working in it as a tour guide, I see that the main reason behind the graveyard deterioration is underinvestment. Visitors tear and wear plays a role but quite minor in comparison. What it needs is more funding, quite a lot, and charging freelance tourguides a fee per person is not going to collect even a relevant fraction of it. Rather, the plan 3 simply keeps tourist numbers the same but reduces rule following behaviour.

Every party should play their role in preserving, profiting and enjoying the graveyard. I don't thin tour guides and tourists' role is to collect money for its preservation, which is more a task to be assumed by the council and/or any other heritage conservation organization. I do believe that charging all tour guides an appropriate fee while giving them recognition for their role in managing the massive tourist input of Edinburgh is the way to go and a task we will happily take on.

I hope this feedback will be useful and thank you for your efforts in improving and managing Edinburgh historical treasures.

Kind regards,

[REDACTED]
[REDACTED]

From: [REDACTED]

Sent: Monday, January 29, 2024 7:42 PM

To: Bereavement <bereavement@edinburgh.gov.uk>

Subject: Cemetery permit scheme

Hello,

I'm emailing to respond to the cemetery guide permit scheme. As a freelance guide in the old town, I regularly give tours that include Greyfriars Kirkyard. It is a popular destination for tour guests of all stripes: I give history tours, where guests are keen to hear about Greyfriars Bobby, the Covenanters, George Heriot's School and several features of the kirk and kirkyard themselves. I also give Harry Potter tours, taking guests to Thomas Riddell's grave and the memorial to William McGonagall. And I guide ghost and 'dark side' tours, in which guests are eager to visit the graveyard at night and see the Mortsafes, the Covenanters' Prison and the mausoleum of Bloody Mackenzie.

The following response is based on considerable experience of the complex dynamics of guiding in Greyfriars Kirkyard, as well as a deep commitment to making tourism in Edinburgh sustainable and beneficial to the local community. I would be grateful if the below, while extensive, could be properly considered and kept confidential. I am also available to discuss any of this further by phone, email or in person.

I have found the current system of permits and fees to work fairly well - the permit itself is clear and practical, the cost of application for an individual freelance operator like myself is reasonable, and it has been good to see resources increasingly used for enforcement as well as improving footpaths in the kirkyard - especially near Thomas Riddell's grave. I would support either of the first two options being proposed: either the status quo or a 'tiered' structure.

However, I do not see Option 3 as being workable without considerable reassurance and further detail about how it would operate. For individual guides and companies alike to share their footfall data with the council, we would require a clear sense of what kind of costs to expect.

If a clear and affordable upper 'ceiling' (of, for instance, £200-£300 for an individual guide) was set on the likely costs, I imagine that myself and other guides I know - who are all deeply committed to ensuring that tourism in our city is sustainable - would be willing to co-operate closely on finding a long-term solution to any budgetary problems.

However, co-operation requires mutual trust, and many of the guides I know are currently very uneasy about what is driving the proposed third option. Most freelance guides in the old town, whom I suspect make up the bulk of footfall in the kirkyard, do not currently have a means of collective representation in the policy process that can match the resources of the Scottish Tourist Guides Association (STGA) - a body whose membership, due to highly prohibitive pricing structures of up to £9000, is not available to most guides, and whose

guides are amongst the least frequent users of the cemetery and thus have relatively little understanding of its dynamics.

The council's public meetings thus far have nevertheless been dominated by contributions from STGA members, many of which have been hostile to "large groups" and guides who make regular use of the kirkyard. This has led to a great deal of misrepresentation and misunderstanding of our own work, which ought instead to be an invaluable source of knowledge about how tourism actually operates in the kirkyard.

As guides committed to the sustainability of our work, we endeavour to keep our groups of tourists on footpaths at all times - especially at Thomas Riddell's grave, where the substantial footpath erosion was very clearly caused by individual tourists without a guide (we see this on a daily basis). The group of freelance guides with whom I work, operating through the City Explorers agency, were recognised for our consistency in upholding the permit system by Charlotte, who monitors the permit scheme, at one of the guides' meetings.

It is likely that there would also be some highly undesirable natural and practical consequences to substantially higher fees for regular kirkyard guides and those with larger groups.

Should a system of mandatory payment on entry be introduced, for example, it would create a significant bottleneck at the entrance to the graveyard at peak times, such as at 12.45pm or 8pm - when several tours often arrive simultaneously. This would mean large groups of tourists queuing outside the gates at a junction which is notoriously dangerous, posing a serious risk of traffic incidents.

A system that charged significantly higher fees for higher footfall may also discourage freelance guides - whose profit margins are sometimes very narrow and unpredictable, due to the importance of tipping and donations to counterbalance high agency fees - from entering the kirkyard at all. This would not be likely to reduce footfall, however. Guides under pressure (from agencies and tourists alike) to include the kirkyard in their tours would be likely to finish their tours at the entrance before inviting their tourists to go in and explore for themselves - thus meaning that as well as losing permit revenue, the cemetery would lose the free monitoring and shepherding of tourists provided by guides.

Damaging unintended consequences would also emerge from a reduced limit on group size, which some smaller-group guides have proposed. This would not reduce the number of tourists going into the graveyard - instead, it would lead the large number of freelance guides working through agencies to further subdivide the same number of tourists into more groups, meaning that more groups end up competing for the same finite amount of space in the graveyard. Instead of one group of 30, there would be two groups of 15, or perhaps even three of 10, depending on the limit. This would *increase* congestion, causing more groups to walk around each other and further erode the areas around paths. Short of actually reducing the number of tourists coming to Edinburgh, large groups are in fact the least bad option when it comes to congestion and erosion in the cemetery.

Finally, there is a question of proportionality and justice. It has not yet been convincingly demonstrated to us that the costs of maintaining the hard footpaths that we do use are equal to the costs we may be expected to bear for licensing, especially if a significantly larger footfall-based fee structure is introduced. Furthermore, we do not believe that

our *contribution* to the maintenance of the cemetery has been adequately acknowledged in this process - by keeping large groups of tourists off the grass and gravestones, we are ensuring that further erosion does not happen.

Yet there seems to be a growing emphasis in the process on charging based on footfall, regardless of affordability to those being charged. It should be emphasised again, here, that the guides making the most regular use of the kirkyard often do not make a predictable or secure income from doing so, due to the precarious nature of the freelance guiding model. After paying sizeable fees to the agencies which connect freelance guides to tour groups, many freelance guides are reliant on tips and donations to break even and make a living, and cannot simply pass on higher fees in their pricing structure, which is often set by the agencies (along with the tour routes themselves).

Many of the guides who use the kirkyard less regularly and with smaller groups, on the other hand, are often able to do so precisely because they are more secure, and can exercise more individual discretion over where to take their tours. Their complaints at paying the current (affordable) permit fees do not seem to justify a footfall-based fee regime which would drastically reduce the already fragile income of more regular kirkyard guides, and cause the unintended consequences above. To charge fees on the basis of footfall risks failing to take into account what is a highly complex system full of unintended negative consequences and potential injustices.

As I said, if you wish to discuss any of this further, I am more than happy to do so by email, phone or in person.

Kind regards,

A solid black rectangular box used to redact the sender's name and signature.