

Culture and Communities Committee

10.00am, Thursday, 5 October 2023

Edinburgh Cemetery Tour Registration Scheme - Update

Executive/routine
Wards

Routine
All, particularly Ward 11 – City Centre

1. Recommendations

- 1.1 It is recommended that the Culture and Communities Committee:
 - 1.1.1 Notes the progress in implementing the revised scheme; and
 - 1.1.2 Notes the proposal to carry out further engagement with stakeholders, with the outcome reported to Committee in early 2024.

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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. This report provides an update on progress on implementation of these changes and proposes further engagement with stakeholders with regard to the impact of 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 third most visited free to enter attraction in Scotland. Other city centre cemeteries (such as St Cuthbert's and Old Calton) also receive significant annual footfall.
- 3.4 Whilst many visitors visit independently, there exists a significant number of organised commercial tours which generate significant visitor numbers. These tours are often organised by tour guide companies (employing individual tour guides), although some guides work independently.
- 3.5 A Cemetery Tours Registration Scheme was approved by Committee and introduced in 2020. 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 current scheme had raised approximately £5,000 in the each of the previous two years, Committee agreed to revise the applicable fees.

- 3.6 The revised fee structure agreed, with effect from 1 July 2023, included:
- 3.6.1 An annual registration for each individual company of £150; and
 - 3.6.2 Each individual guide to pay a registration fee of £120.
- 3.7 A previous informal practice of tour companies paying one fee, irrespective of how many guides they had operating in the cemeteries, ceased on implementation of the revised structure on 1 July 2023.
- 3.8 Without radical change, the unfunded pressure of the continued use of cemeteries for commercial purposes is unlikely to be sustainable. The Council maintains a capital budget for general maintenance of the cemeteries, but that is not able to contain the costs resulting from large visitor numbers.
- 3.9 A second aspect of the previous tour guide registration scheme was that tour guides were expected to either collect a 50p donation from each customer or to encourage customers to use donation points to donate the same amount. Income from this second aspect of the scheme remains low. Committee agreed that further work should be undertaken with the tour guides on that aspect, with a further report being brought back to Committee.

4. Main report

Implementation of the revised fee structure

- 4.1 After a short period of notice to relevant parties, a new fee structure for Cemetery Tours took effect on 1 July 2023. Uptake of the registration scheme was good, and there is no sign that the number of guides has dropped compared to the estimate provided to Committee in May 2023.
- 4.2 As of 29 August 2023, a total of 321 registrations have been issued - 225 tour companies and 96 individual tour guides. This has raised a total income of £45,000.
- 4.3 In order to assist with the efficient issuing of registrations, the Licensing Service provided expertise to manage the large volume of applications in a time sensitive manner by processing applications and issuing registrations.

Enforcement of the Scheme

- 4.4 It is recognised that the revised scheme requires to be properly enforced to ensure that legitimate businesses, which complied, are not put at a competitive disadvantage by competitors which either did not register with the scheme or sought to continue to register multiple users under one registration.
- 4.5 Consequently, training and support has been and will continue to be provided to the Bereavement Services team to ensure that they were appropriately equipped to engage with tour guides and to ensure consistent compliance with the scheme. In particular, enforcement resources from Licensing and Trading Standards were deployed during July to support monitoring of compliance. This led to high levels of compliance ahead of the August festival period. It is proposed to make these

additional resources available periodically to enhance and support colleagues within Bereavement Services to ensure that compliance remains high.

Engagement

- 4.6 Generally, the changes to the scheme have been well received with some positive feedback received. A number of operators have expressed concerns about the consultation with the sector prior to implementation of the revised fees and the short notice provided, particularly when operators might have already set their fees for the season. A small number of operators also expressed concern that the previous arrangement of one fee per company, irrespective of the number of guides, is no longer available.
- 4.7 It is acknowledged that the changes were implemented in a relatively short time scale, and this should be avoided in the future, if possible. However, this has to be set against the backdrop of unsustainable financial pressures and that the previous fee structure had been set with the expectation of additional income from visitor donations, which did not materialise.
- 4.8 Some operators wish the fee charged to recognise differing sizes of companies in terms of the number of guides, and for the Council to reinstate the previous practice of issuing a registration for one month to take account of the festival period.
- 4.9 Officers have had discussions with, and have offered to engage with, the relevant companies during the period from October to December 2023, to explore the possibility of making revisions to the scheme early in 2024. Any changes would be contingent on progress being made in areas such as addressing the need to ensure that visitors participating in tours make contributions, and putting in place a robust method to ensure that this happens. 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.

5. Next Steps

- 5.1 Engagement sessions with tour companies and guides will be arranged to discuss how the Cemeteries Tour Guide Scheme could evolve in terms of fee structure and visitor contributions. Officers will report back to Committee with an update on these discussions and proposals for revisions to the scheme in two cycles, and thereafter will provide the Committee with an annual report on the scheme.
- 5.2 Additional engagement will be held with key stakeholders (such as Edinburgh World Heritage) to ensure that tour operators continue to respect the historic nature of the cemeteries and ensure no damage is caused.
- 5.3 Monitoring of compliance with the scheme and also of the income received will continue.

6. Financial impact

- 6.1 The revised fee structure has generated £45,000 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, this remains a risk and it is likely that at the end of the busy summer period the immediate need for repair work to deal with wear and tear due to heavy footfall over the period will have to be assessed.

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 and will be carried out as reported at 4.6 to 4.9 and 5.1 and 5.2 above.

10. Background reading/external references

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

11. Appendices

- 11.1 None.