

The impact on bereaved people and funeral directors of restrictions during COVID-19

Lessons learned and recommended next steps

August 2020



“Many people have been grieving in isolation, unable to attend funerals, say goodbye, and be close to those funerals they love. COVID-19

“When you feel you have no control over how you can experience those last moments with someone, this can have a profound impact on the grieving process.”

- Cruse Bereavement Care



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Executive Summary

The National Association of Funeral Directors (NAFD) is grateful for the opportunity to submit evidence to the committee. This report seeks to highlight the contribution made by funeral directors in the UK during the pandemic, examines the ways in which COVID-19 has affected bereaved people, and makes recommendations for how funerals could be managed in the event of a future wave of the virus.

The country owes a lot to the efforts of the funeral sector workforce, for the way they have stepped up and the support they have provided to bereaved people.

The NAFD believes that the recommendations it makes in this report would ensure that the country is better prepared in the event of a second wave of the coronavirus pandemic or, indeed, another future pandemic. The NAFD also believes that these recommendations will ensure a stronger and more resilient funeral sector, which will be of benefit to the country after COVID.

The NAFD recommends that:-

- Clear guidance is issued to funeral venue managers, detailing that mourners should be encouraged to attend a funeral within the venue's own risk-assessed capacity.
- The Government consult on the feasibility of a National Day of Mourning to remember those who have died during the coronavirus pandemic.
- The Government provide reassurance to funeral directors that it can provide more consistent and reliable support to access PPE in the event that it cannot be secured through their own supply chains.
- The Government provide financial support to the funeral sector in the event of a second wave, so that the sector can source the necessary PPE.
- Funeral directors are recognised as Category 2 Responders for the purposes of the Civil Contingencies Act 2004.
- Local authorities/Local Resilience Forum Management appoint funeral sector representatives in consultation with the Deceased Management Advisory Group (DMAG).
- The Government more clearly documents the role of the funeral director and builds it formally into the pandemic emergency structure.
- The Government ensures that modelling is shared with the NAFD and DMAG to enable the sector to effectively plan and have the right resources in the right geographical locations.
- The Government ensure that the changes to death registration brought in by the Coronavirus Act in March 2020, permitting digital transmission of paper work, registration over the phone, and for a trusted person to step in to register the death on behalf of a family where needed, remain after the pandemic comes to an end.
- The Government adopt, UK-wide, the Scottish system for registering a death, removing the need for a second doctor's signature.
- The Government considers the NAFD's proposal for a Crisis Funeral Loan, especially in the event of a second wave of the pandemic.

The NAFD would welcome the opportunity to follow up this submission with oral evidence. NAFD CEO Jon Levett would be glad to appear before the House of Lords Committee on Coronavirus to provide further information about the future of funerals in the UK.

Introduction

A funeral provides an important sense of closure for bereaved people and is very often the start of the grieving process, allowing bereaved people to say a final goodbye and pay their respects.

During COVID-19, all of the norms and traditions of a funeral – based around the principle of coming together to mourn someone who has died, pay their respects and support their closest loved ones – changed beyond recognition, with profound and potentially long-term effects on bereaved people.

In the light of everything we now know about COVID-19, this paper looks at some of the key ways in which COVID-19 has affected bereaved people and makes recommendations for how funerals could be managed during future waves of the virus in the UK.

The role of the National Association of Funeral Directors

The National Association of Funeral Directors (NAFD) is the largest and most inclusive trade association for the UK funeral profession. We represent the interests of the entire spectrum of funeral directing businesses – including independent and family owned firms, co-operatives and major funeral groups – and have more than 4,100 UK funeral homes in membership. Between them, NAFD member firms conduct the vast majority of UK funerals each year.

The NAFD is a founding member of the Deceased Management Advisory Group (DMAG). Formed in March 2020, DMAG is the principal reference group for the burial and cremation sector for Government during the pandemic, providing input and support via regular conference calls with the Cabinet Office, Ministry of Justice and the Ministry of Housing, Communities and Local Government, as well as coordinating the response of all those caring for those who die during the pandemic.

1. The importance of being there

“Can you imagine how awful it is choosing who attends a funeral?”

A YouGov survey, commissioned by NAFD member Co-op Funeralcare, found that during the national lockdown and first peak of COVID-19, almost half (47%) of bereaved adults in the UK were denied a chance to say goodbye in the way they wanted to.

The ‘Nation in Mourning’ report found that almost 40% of mourners were unable to pay their respects by attending a funeral service and, of an estimated 133,000 bereaved families who lost a loved one during the national lockdown, three fifths (61%) said that nothing in particular had helped them to grieve.¹

Although the restrictions on gathering have been (and remain) a necessary measure, the impact on bereaved people has been profound, with only a handful of people permitted by Government to attend funerals during the peak.

In the early days of lockdown, those who were self-isolating (often those closest to the person who had died – and frequently those in the more vulnerable population groups) - were discouraged from attending, and travelling to attend a funeral was not permitted.

¹ <https://www.cruse.org.uk/new-report-warns-grief-pandemic>

The result of this was that many people who were closest to the person who had died and would have qualified as immediate family and, therefore, been able to attend, still could not.

These restrictions were hard enough – but, in several cases, local authorities or individual venues chose to ban mourners altogether.

The NAFD and its members were particularly concerned at the actions of local authorities that unilaterally banned any mourners from attending burials or cremations at all, as well as those who permitted a limited number of mourners to congregate outside, but would not allow access to the service itself. This went beyond central government guidance and was not in the interests of bereaved families. Following our engagement with Government, we were pleased that they stepped in to urge councils to ensure they enabled small groups of mourners to attend in person.² However, this fell short of a mandatory directive and, given the new powers granted to Local Authorities on 18 July 2020 to manage a subsequent wave(s), it is disappointing to note that there are no specific exemptions or directives around funerals.

We are also concerned to see that more recent regional lockdown measures in Oldham, Pendle and Blackburn have placed additional restrictions on the number of people who can attend a funeral.³

The inability to be witness to the funeral of a loved one, and the impact all of these restrictions have had on the grieving process for tens of thousands of people, means the UK could experience a prolonged period of mourning for months, or even years, to come.⁴ This is likely to be a long-lasting legacy of the coronavirus pandemic, and this should be recognised in future government policy.

Recommendations for the future

Unlike any other life event, witnessing a funeral cannot be deferred and there is no opportunity to repeat it again in the future. The current restrictions, which recommend no more than 30 persons attend a funeral, and permit those who are self-isolating (and are asymptomatic) to attend, while still restrictive, do ensure that those most likely to be severely affected by the death of a loved one are able to attend the funeral.

Being able to be there in person, even if as a smaller group than the family would otherwise have wanted, remains an important choice that we believe families must be free to make for as long as possible and, now that we know much more about how COVID-19 is transmitted, we would like to see these current restrictions preserved as a minimum, even in the event of future local or national lockdowns.

We would also like to see clear guidance to funeral venue managers, including local authorities (crematoria, burial grounds, places of worship and chapels) that mourners should not be prevented from attending funeral services, but instead encouraged to attend, subject to the venue's own risk-assessed capacity.

² https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/880108/Letter_from_Minister_Simon_Clarke.pdf

³ <https://www.gov.uk/guidance/blackburn-with-darwen-oldham-pendle-local-restrictions>

⁴ See [A Nation in Mourning](#), published by Co-op Funeralcare in July 2020

We recommend the Government consult on a National Day of Mourning to reflect on, grieve and remember the many thousands of people who have died during the COVID-19 pandemic. We are aware that Marie Curie is campaigning for such a day and would be strongly in support of this.⁵

2. Minimising the risk of infection

"I have now been in our business for 22 years and we have only had one instance in that time where we have needed the PPE that we are using just now.

"As a result, the only FFP3 masks we had were for our memorial department and I ended up purchasing additional ones, via some scoundrel on eBay who charged £220 for 20 masks. We subsequently discovered that FFP3 masks were not necessary, unless surgical-type procedures were undertaken. Had the guidance been clearer at the outset, I would have been able to source masks more quickly."

Keeping employees and bereaved families safe from infection remains a primary responsibility and key focus for funeral firms during COVID-19. It is also critical, given the number of deaths in care homes and the risk of infection spread, that the safeguard protocols developed with the Local Care Home Association are adopted.

The supply of Personal Protective Equipment (PPE) to all those who needed it, from the onset of the pandemic, was one of the key challenges that faced the Government, NHS and private firms alike.

The changes in PPE guidelines were particularly frustrating as they consistently downgraded the requirements, citing more knowledge of the virus as the justification, rather than what many felt was the reality: a lack of available equipment. This created a lack of confidence in keyworkers with regard to the PPE they were being advised to use. The Government guidance specific to those managing deceased people was not consulted on widely and was, ultimately, published more than a month after lockdown started and after extensive media coverage of the shortages in accessing PPE.

In addition, confusion around public health guidance led to a lack of clarity as to what PPE was required and stark variances between the advice published by Public Health England and its devolved counterparts led to more PPE than necessary being used up quickly.⁶

Although the NAFD appreciated that scientists were still learning about how COVID-19 could be transmitted and this meant the guidance was still taking shape as the weeks went by, these changes and differences in PPE guidelines proved particularly frustrating.

This was compounded by an apparent disconnect within Government and between PHE and government departments, leading to official guidance falling out of step with legal requirements at times and sector representatives being told incorrect or outdated information by well-meaning civil servants on more than one occasion.⁷ This caused much unnecessary confusion and damaged the credibility of organisations like the NAFD, which funeral directors rely on to keep them updated on important developments.

At the same time, many reputable suppliers to the profession were not able to maintain a consistent supply during the pandemic, with 86% of members telling the NAFD that they didn't have enough

⁵ <https://www.mariecurie.org.uk/who/day-to-reflect>

⁶ For example, for a significant period of time around the peak of the first wave, funeral directors in England were advised by PHE that the use of body bags was not necessary to reduce infection risk from someone who had died with the virus, while the advice published in Northern Ireland at the same time required two body bags to be used.

⁷ A failure to update PHE guidance promptly in accordance with a relaxation of legal measures led to a confusing situation in which the restrictions on who could attend a funeral were much stricter than those on who could meet at a pub or bar.

PPE to last four weeks during the peak. Where supply was able to be sourced, the prices were often significantly higher than would be expected normally.

All of this hampered the ability of funeral firms to care for bereaved families and support the Government's national response to COVID-19.

Recommendations for the future

Funeral firms are currently replenishing their PPE stocks ahead of a possible second peak and are reappraising their approach to stock control of key items. However, the majority of funeral firms simply cannot store the levels of PPE that they now know will be needed in the event of a second (or other future) pandemic peak.

While the sector was extremely grateful to the Government for agreeing to the NAFD's request to be able to access additional PPE through Local Resilience Forums (LRFs) in England and Wales, and the NAFD was also successful in its request to the Scottish Government to secure an emergency supply route, often the challenges in the supply chain led to these emergency PPE deliveries being significantly smaller than expected, meaning that local firms awaiting this key support from the Government were often left empty handed.

The NAFD, in common with many other professions which require significant volumes of PPE, would benefit from reassurance from the Government that it could provide more consistent and reliable support to access these items in the event that they cannot secure them through their own supply chains.

The NAFD would also like to see the Government take steps to ensure that key health and safety items, such as PPE, are not subject to the kind of price gouging tactics that have been evident in recent months (for professionals and for the public) and that there are quality controls to reduce the likelihood of poor quality items being presented as appropriate for key worker use.

Given the ongoing sourcing challenges and pricing issues in respect of PPE, we would like to see some financial support provided to the sector in the event of a second peak.

This includes:-

- Extending the VAT-free period beyond the current 31 October deadline, until at least March 2021, as this is likely to be when a second peak will occur.
- Taking action to guarantee the supply chain for funeral directors and cap the price of essential PPE during times of crisis.
- Compensating funeral firms where they can demonstrate that they have been unable to recover significant, unexpected and/or unreasonable additional costs for PPE, in order to comply with PHE guidance while they were responding to COVID-19 as part of the national response to COVID-19.

We would also like to see government departments and Public Health England working in a more joined up way in any future waves of the pandemic, ensuring the sector is kept up to date and sufficiently warned ahead of important changes coming into effect. The NAFD hopes that the abolition of Public Health England, and its replacement with a National Institute for Health Protection will ensure that the government departments function in a more joined up fashion in the future. This will be important both in the event of a second wave of the coronavirus pandemic, and for future public health or other crises.

We recommend that Public Health England and government departments share drafts of all secondary legislation and official guidance that is likely to impact the sector with the Deceased Management Advisory Group for comments well in advance of it coming into effect. Proper consultation will help guard against unintended consequences and prevent guidance falling inadvertently out of step with legislation.

3. Understanding the role of funeral directors in the pandemic response

“There is a group of people whose role and whose compassion has not been a focus in this extraordinary time, but it must be recognised.”

Earning the designation of ‘key worker’ for funeral service employees was a hard-won victory in the first few weeks of the pandemic – but a very important one, given the potential scale of deaths expected from COVID-19 and the importance of funeral homes being able to remain operational.

However, as a private sector partner in the national response, what was often experienced on the ground was a lack of understanding of the role of funeral directors and what levels of access to information and planning was required from Local Resilience Forums, including on important practical issues such as whether funeral directors should be able to access key worker stocks of PPE.

Despite the NAFD writing to every Local Resilience Forum (LRF) in the country, offering to appoint a local representative to feed into planning and facilitate communication to local businesses, many refused to engage with us at all. Others chose to rely on the advice of local funeral directors who were not appointed by either of the main sector trade bodies, which meant they could not benefit from our collective knowledge and limited their ability to communicate with our members both locally and nationally.

One particularly unfortunate consequence of LRFs’ general lack of engagement with national trade bodies was that funeral businesses were not always able to allocate resources in a sensible way, to ensure local areas with the greatest level of demand were not overwhelmed. Some of our members are large organisations with national reach, and would have been able to use local modelling data to ensure extra capacity was made available where needed. Without this information, it felt very much like we were feeling around in the dark. We believe there is work to be done for Government to have access to ongoing insight into the funeral sector workforce – its size, age, skills and location.

The response of the sector was also hindered by the continued lack of access to Government modelling. We can understand why Government was reluctant to share the information, particularly given the leaks at the start of the pandemic, leaving the NAFD to source its own insight. It would have been much better if Government had been clear from the start that they were unlikely ever to be able to share their modelling, as a result, throughout the crisis we have largely been working with limited information, which has hindered our plans and preparedness. In the event of a future pandemic, the NAFD hopes that such information is more readily made available to the funeral sector.

Recommendations for the future

The NAFD recommends that the Government recognise funeral directors as Category 2 Responders for the purposes of the Civil Contingences Act 2004.⁸ This will ensure that, for any future pandemic

⁸ The Civil Contingencies Act (2004) establishes a legislative framework for emergency planning arrangements at the local level. The Act requires Category 2 responders, many of whom are private sector bodies (e.g. utilities, transport companies),

or public health crisis, funeral directors are fully integrated into multi-agency planning on all levels through involvement in LRFs. In the absence of such recognition, it is likely that the crucial role of funeral directors in the management of mass fatalities will continue to be overlooked, to the detriment of all.

The introduction of DMAG has provided a sector-wide point of contact for central and devolved governments throughout the first wave of the COVID-19 pandemic. The Government should also advise local authorities and LRF coordinators to appoint funeral sector representatives in consultation with the Deceased Management Advisory Group (DMAG), ensuring that Local Resilience Forums are able to benefit from the collective knowledge of the sector, rather than relying on individual funeral directors.

Additionally, the Government should ensure that its modelling is shared with the NAFD, DMAG and larger national operators to enable the sector to effectively plan and have right resources (physical and human) in the right locations. The NAFD has already proven itself to be a trusted advisor, and so scenario modelling should be shared on a confidential basis with the NAFD as the largest and most inclusive sector representative, to ensure risks can be flagged and mitigation strategies rapidly developed.

4. Registering a death

“It has been excellent and has allowed any minor errors to be rectified promptly. This has proved to be far more efficient for us compared to historic submission of paperwork to various local authority/crematoria offices.”

Registering a death has traditionally been a paper-driven process and has often been hampered by delays in the system, serving to increase the gap between death and the funeral.

Changes to death registration in England, Wales and Northern Ireland, brought in by the Coronavirus Act in March 2020, which permitted digital transmission of paper work, registration over the phone, and for a trusted person to step in to register the death on behalf of a family where needed, have been welcomed by NAFD members. Their feedback indicates that death registration during COVID-19 has been proceeding smoothly and that these changes were vital to enable the funeral sector to successfully manage the pandemic.

The changes have also provided solution to the long-standing problem of funeral directors not always being able to find a doctor willing and able to attend a funeral home for the purposes of completing the necessary paperwork.

A survey of NAFD members confirmed that 82% of funeral directors felt that processing forms digitally was working either well (30%) or very well (52%) and 79% of respondents confirmed they were experiencing delays in the registration of death rarely (28%) or not at all (51%).

Recommendations for the future

The NAFD has been campaigning for long-overdue improvements to the death certification process for many years.

to co-operate and share information with Category 1 responders (e.g. emergency services and local authorities) to inform multi-agency planning frameworks.

We would like to see these changes that were brought into force by the Coronavirus Act become permanent, particularly as they are proving so positive in helping bereaved families with the extensive paperwork that must be completed after someone dies. Removal of the need for a second doctor's signature to bring England and Wales into line with Scotland, is the next step. We would recommend the adoption of the Scottish system which provides for subsequent sampling of all deaths registered and death certification. This would save a great deal of time, both for families and funeral directors, which could have the additional benefit of an overall reduction in funeral costs.

The increased gap between death and the funeral has been a trend that predates the coronavirus pandemic. However, a positive legacy of the coronavirus could be a more expeditious process in the future.

5. Covering the costs of a funeral

"I had to make the funeral arrangements knowing that I didn't have any money to make it with."

In 2020, thousands of families have faced the unexpected death of a loved one. For some families, there has been more than one death.

At the same time, the UK has entered a serious recession, which is considered likely to be even more significant than the recession that followed the financial crisis of 2008. Nearly three million people have needed to access Universal Credit and, once the Government's furlough scheme comes to an end, we are likely to see more people facing unemployment. Even those in employment may still have a reduced or limited income, especially those who are self-employed or who have had their hours cut. This means there are many more people in the UK who are 'Just About Managing' and any major expense, such as an unexpected funeral, will be out of their reach.

The Social Fund funeral payment is the main source of government support to cover the costs of a funeral. Although the upper limit on funeral expenses was recently lifted to £1,000, it still only makes a contribution to the costs of even the simplest funeral. The application process is long and complex, and typically only around half of those who apply are successful. Furthermore, the strict eligibility criteria exclude anyone who is not in receipt of a qualifying benefit, and many who are, from receiving any support.

Given the unexpected combination of increased deaths and financial hardship being felt by the nation, in May 2020, the NAFD proposed to government the creation of an interest-free (and not means-tested) Funeral Crisis Loan, to help bereaved people during the COVID-19 crisis.⁹

Recommendations for the future

The Crisis Funeral Loan we proposed was not something the Department for Work and Pensions felt was needed during the first wave of the pandemic but, in the event of a severe second wave, the NAFD and its members would like to see the proposal given serious consideration. This proposal has already received support and backing from faith leaders, MPs, bereavement charities and others.¹⁰

It could be efficiently administered through existing mechanisms such as those used in relation to the Bounceback Loan and Child Funeral Fund, helping the Government prevent further time-

⁹ <https://nafdcovid19.org.uk/2020/05/nafd-presses-government-to-introduce-crisis-funeral-loan/>

¹⁰ <https://nafdcovid19.org.uk/2020/06/coalition-of-support-builds-for-crisis-funeral-loan-proposals/>

consuming administration. It would also be almost cost neutral to the Government as it is not a grant, but a loan, and as a result the outlay would be recouped over time.

The key benefit to bereaved people would be that they could organise a funeral knowing that it can be paid for, allowing them to focus on grieving and remembering their loved one while, with the money going directly to the funeral director and cremation or burial organisation, it would also prevent funeral directors from being left with unpaid funeral debts or deceased people being held for prolonged periods as families try to meet minimum deposit requirements. Increased numbers of deceased people from excess deaths, combined with inability to pay for a funeral, will strain the available storage capacity, particularly in the winter months. It is important that we seek to avoid a public health crisis, due to the combination of a significant increase in deaths and a severe economic recession.

This proposal for a Crisis Funeral Loan should be considered, even in the event that the pandemic ends without a severe second wave, as a means of helping UK-residents with the cost of an unexpected funeral. Greater recognition of the fact that many need help to cover the cost of a funeral could be an important and long-lasting legacy of the coronavirus pandemic.

Funerals in the future

Although it is, perhaps, too early to tell, there are already signs that the pandemic could have a lasting impact on the very nature of funerals, how people engage with the funeral directing profession and what the public expect from the process.

For example, social distancing requirements have seen a stark increase in the number of people arranging funerals online or over the phone, which may have encouraged them to compare the service offerings of providers that they might not previously have considered.

Restrictions on the number of people who can physically attend funerals have served as a catalyst for a general shift in favour of simpler, smaller scale, funeral options, and an increase in the availability of webcasting capability at funeral venues has opened up the possibility of participating in a funeral service, not only to those who are self-isolating, but to anyone who otherwise would not be able to attend.

While many will have felt these changes and limitations took away from their experience, some have reported positive outcomes, such as preferring a more intimate service. It remains to be seen whether, and to what extent, these consumer behaviours will persist once the pandemic has passed, but the NAFD is putting measures in place to help ensure its members are ready to meet changing consumer expectations.

Among other things, the NAFD is implementing a new code of practice for members, taking into account recent market changes; reviewing its quality inspection function to ensure standards remain high; and requiring its members to put their full pricing and service information online.

If the Committee would like to learn more about the steps we are taking, we would be pleased to discuss these with you.

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Lessons learned and recommended next steps

