



# UK FUNERAL DIRECTOR CODE

National Association of Funeral Directors

# UK FUNERAL DIRECTOR CODE

## INTRODUCTION

Following the introduction of a statutory Funeral Director Code in Scotland on 1 March 2025, the NAFD is pleased to launch a refreshed and unified UK Funeral Director Code for all members.

The Scottish Government's decision to implement a statutory Code followed extensive consultation and reflected the need to provide clarity, consistency, and public assurance.

In parallel and building on the commitment made at our Annual General Meeting in Windsor in 2024, the NAFD agreed with SAIF a shared foundation for a Code. At its core, this represents a unified approach, with both Associations agreeing a common foundation based on the statutory Code introduced in Scotland. Each Association agreed to then develop its own addendum to the Code reflecting its specific membership requirements and governance.

This collaboration marks a significant step forward for the sector, helping to create greater consistency across all nations of the UK, while strengthening public confidence and professional alignment.

As a result, the new NAFD UK Funeral Director Code is now structured in two parts:

## PART ONE: THE CORE CODE

This is the core standard and is word for word identical to the statutory<sup>1</sup> requirements and enhanced expectations that go beyond the minimum legal and regulatory standards. It reflects current best practices and anticipates the evolving needs of clients, families, and society. It also supports continual improvement within the profession by encouraging transparency, feedback, and robust governance.

The principles, rules, and outcomes described in this Code apply across all areas of funeral service, from first contact with a client to aftercare following the funeral.

## PART TWO: THE MANDATORY ENHANCED REQUIREMENTS OF THE UK FUNERAL DIRECTOR CODE

This section builds on the principles of the core Code and introduces a set of mandatory enhancements which all NAFD members must follow. These requirements reflect the high standards of care, accountability and transparency expected from those who choose to be part of the NAFD. They also prepare our members to meet and exceed future regulatory standards.

These Enhanced Requirements do not replace the core Code. They must be read and applied alongside it. Their purpose is to strengthen key areas of practice through clearer expectations and the introduction of detailed procedures. This includes improvements in areas such as client information, record keeping, mortuary care and staff training. Importantly, this section reflects learning from the Fuller Inquiry Phase 2 report and draws on best practice models such as the Human Tissue Authority Code, to ensure our members are fully equipped for whatever form regulation may take in the future.

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<sup>1</sup> Currently in Scotland only. Whilst some elements of the UK Funeral Director Code are statutory in Scotland, members operating in other jurisdictions should treat these provisions as recommended practice.

By adopting this new Code in full, NAFD members are making a clear commitment to professionalism, leadership and public trust. It sets a benchmark for funeral directors across the country and signals to families, regulators and the wider public that NAFD members are not only meeting standards but exceeding them.

## HOW WE WILL SUPPORT YOU

We understand that adapting to a new Code requires guidance and clarity. The NAFD is here to support you at every step. We will provide:

1. At a Glance – a summary to each Part<sup>2</sup> of the code (not necessarily each individual clause)
2. In Practice – an overview of what each Part of the Code means in practice for each member. Where appropriate we have included individual Clauses<sup>3</sup> to the Code.
3. During Inspection – an overview of what the NAFD Standards and Quality Managers (SQMs) may look for during premises inspections.

This Code is not just a document of rules. It is a framework for excellence and a tool to help you continue to deliver compassionate, dignified and professional services to the families you support.

We thank you for your continued commitment and partnership as we move forward together with confidence, clarity and shared purpose.

## PRINCIPLES

Members must:

1. Act in the best interests of each client, and prospective client.
2. Provide the best possible level of care to bereaved people, keeping in mind the specific needs of each client and family.
3. Respect and maintain the dignity of deceased people in your care at all times.
4. Act transparently, with honesty and integrity.
5. Provide clients with full and fair information about services, products and associated prices.
6. Behave in a way that promotes and maintains public trust in their business, the funeral directing profession and related industries.
7. Comply with all legal and regulatory obligations and deal with their regulators in an open, timely and cooperative manner.
8. Run their business effectively and in accordance with proper governance and sound risk management principles.
9. Run their business in a way that encourages equality of opportunity and respect for diversity.

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<sup>2</sup> Part refers to each section of the UK Funeral Director Code

<sup>3</sup> Clause refers to individual requirements within a Part of the UK Funeral Director Code

10. Run their business in a way that encourages a culture that values and welcomes both negative and positive feedback as a way of putting things right and continuously improving service and
11. Conduct appropriate due diligence in relation to all third-party contractual relationships that have the potential to negatively impact clients.

## **OUTCOMES**

The Code aims to achieve the following outcomes:

- Ensure minimum standards of care of the deceased.
- Establish and promote a common understanding of good practice in relation to care of the deceased.
- By doing so it will also help increase transparency of choice of goods and services to help people to make informed decisions.

### **1. Accountability and compliance**

- 1.1. The Code does not negate the responsibility of the funeral director to adhere to and take account of other legislation and guidance. It is the responsibility of each funeral director to ensure that they are operating in accordance with all relevant legislation.

### **2. Engagement of the funeral director and transfer of the deceased**

- 2.1. It is expected that all funeral directors are transparent about the goods and services they offer. If the funeral director does not offer the goods or services about which a person has enquired or requested, it is expected that the funeral director makes that clear and makes the person aware that those services can be accessed elsewhere. All written and verbal communication must be clear and in plain language, avoiding jargon. The funeral director must act in accordance with the instructions of the client, as far as reasonably practicable. The funeral director must act in accordance with the requirements of this Code.

#### **2.2. First contact**

- 2.2.1. When the funeral director is contacted in relation to the death of a person initial details must be gathered from the client (or other person who makes contact with the funeral director on behalf of the client or while the person who will be the client is not yet determined). The funeral director at first contact must, whenever practicable, obtain and record the following minimum information:
  - a. The full name, address and telephone number of the person making contact with the funeral director.
  - b. The full name and address of the deceased.
  - c. The date of birth and age of the deceased, if known.
  - d. The current location and address of the deceased, if different to the above address.

- e. Confirmation that a suitably trained registered healthcare professional has confirmed or verified the death or pronounced life extinct (PLE).
- 2.3. Transfer of the deceased into the funeral director's care
  - 2.3.1. In the event that the funeral director has been contacted by someone other than the client, the funeral director must make all reasonable enquiries to establish the identity and contact details of the client at this stage and to establish contact with the client as soon as possible.
  - 2.3.2. The funeral director must inform the client that they adhere to the Code and provide the client with a copy or web link if requested.
  - 2.3.3. Once the funeral director has been instructed, they must take the deceased into their care at the earliest possible opportunity.
  - 2.3.4. Before transferring the deceased into their care the funeral director must ensure that:
    - a. The equipment to be used is suitable for the transfer of the deceased; taking into account the deceased's body type – and is clean, in good condition and well-maintained.
    - b. The staff involved in the transfer of the deceased are trained to do so.
    - c. The vehicle used to transfer the deceased must be specifically equipped and used for that purpose; and is clean and well-maintained.
    - d. The deceased are treated with care and dignity.
    - e. Consideration is given to any bereaved persons present.
  - 2.3.5. At the location from where the deceased is to be collected, the funeral director must:
    - a. Confirm the identity of the deceased.
    - b. Obtain signed authorisation from the client or the person the client has nominated to represent them for the transfer of the deceased into their care; or, where the client has yet to be identified, signed authorisation from the person requesting the transfer (e.g. hospital or care home staff).
    - c. Advise that person in writing (or by e-mail) of the location where the deceased is being transferred to including an address and contact number for the location.
    - d. At the earliest opportunity inform the client of all locations where the deceased will be cared for (and all addresses of the premises where the deceased will be kept).
    - e. Make or obtain a record of the deceased's personal effects the funeral director will take into their care and a record of any personal effects which have been returned to the person signing the record at the time of transfer. The funeral director must ensure that this record is checked and signed (on paper or electronically) by the client or the person the client has nominated to represent them, before leaving with the deceased. If the client has yet to be identified or is unavailable at the time of the transfer the personal effects record must be counter-signed by another person such as a member of staff of the hospital mortuary or care home before the funeral director departs with the deceased.

- f. Securely attach to the deceased a completed identity tag (e.g. to the wrist).

### **3. Care of the deceased and premises used by the funeral director**

- 3.1. The funeral director should familiarise themselves with the Health and Safety Executive's guidance on managing infection risks when handling the deceased. It covers the safe handling, storage and examination of bodies and pathological specimens in hospitals, mortuaries and post-mortem rooms. It also provides guidance for those involved in funeral services (including embalmers).
- 3.2. It is expected that funeral directors clearly and sensitively describe their services for care of the deceased to the client and must keep a record of having done so.
- 3.3. It is important that no client is pressured or exploited, and advice should be given to them by experienced and/or trained staff in a clear manner using plain language. The funeral director should always be mindful of the difficult circumstances the client is likely to be experiencing.
- 3.4. The client must be told the location(s) where the deceased will be cared for/kept.
- 3.5. Where the funeral director is using the services of another provider for any part of the care of the deceased a written Service Level Agreement (SLA) must be in place with that provider. Each SLA must be reviewed regularly and at least once per year. A SLA is not required for singular ad hoc arrangements (e.g. repatriation); in such a case a written agreement is sufficient.
- 3.6. Where aspects of care of the deceased are being carried out by a third party the funeral director must clearly and sensitively inform the client which aspects of the care of the deceased these are and keep a record of having done so.
- 3.7. All care of the deceased must take place in a location(s) specifically chosen for that purpose and the funeral director must ensure that their care facility or mortuary is fit for purpose. This requires that:
  - 3.7.1. the premises are lockable, and accessible by authorised persons only.
  - 3.7.2. the premises are clean, well-maintained and regularly inspected to ensure high standards of cleanliness.
  - 3.7.3. the location of, and access to and from, the care facility or mortuary is suitable for the designated purpose.
  - 3.7.4. the funeral director has access to equipment that can accommodate all body types and care services offered by the funeral director and the equipment must be well maintained.
- 3.8. The funeral director must carry out regular visual checks of the condition of the deceased and a further check immediately before the coffin is closed or immediately prior to the funeral service if no coffin is being used.
- 3.9. The funeral director must retain a comprehensive record of all deceased persons who have been in their care. The record must be sufficiently detailed to record what actions have been carried out in relation to the deceased (e.g. first offices, washing, dressing – where, when and by whom, time of deceased's arrival and departure at funeral director's premises). The record must be stored in an accessible form, in secure conditions and is to be retained for a minimum of 5 years. Where a record contains data about any person who is still living, funeral directors are required to

comply with all relevant legislation (e.g. UK General Data Protection Regulation, the Data Protection Act 2018 etc.).

### 3.10. Care practices

- 3.10.1. The funeral director must be able to demonstrate that they have assessed the activities undertaken by every staff member whose role includes duties relating to the care of the deceased. A record of each assessment, the outcome of the assessment and training requirements/training undertaken must be kept by the funeral director and made available to inspectors on request.
- 3.10.2. At all times during their care the dignity of the deceased must be maintained and appropriate shrouds, clothes and/or modesty covers used.

### 3.11. First offices

- 3.11.1. First offices is a process of caring for the deceased to assist with preservation and to make them presentable for viewing.
- 3.11.2. When requested the funeral director must describe their services for first offices in a way that is sensitive to the client to ensure that the client has an understanding of how the deceased will be cared for by the funeral director.
- 3.11.3. Where it is possible to do so first offices must take place in every case unless the client has specifically requested that first offices are not to take place. First offices must be carried out in a manner that maintains the dignity of the deceased, treats them with care (including moving the deceased in ways which avoid damage) and, at a minimum, includes cleaning and washing the body, dressing them, closing the eyes and mouth and arranging the hands.
- 3.11.4. Where first offices have not taken place the funeral director must keep a record of the reason/s for this.

### 3.12. Embalming

- 3.12.1. Embalming is defined as the preservation of a body from decay through injection of a chemical embalming fluid. The preservative solution (the embalming fluid) replaces the blood as well as treating the body cavity and organs<sup>4</sup>.
- 3.12.2. Embalming is not a requirement for burial or cremation.
- 3.12.3. There is no requirement for the funeral director to offer embalming as a service.
- 3.12.4. The funeral director must provide clear information to the client about embalming in order that the client can make an informed decision about whether or not to instruct embalming.
- 3.12.5. The funeral director must obtain the client's informed and written permission before embalming can take place.
- 3.12.6. It is the responsibility of the funeral director to ensure that those performing embalming on behalf of their business are adequately trained/qualified to do so and are meeting the necessary health and safety requirements.

### 3.13. Emergency invasive procedures

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<sup>4</sup> P.41 Managing infection risks when handling the deceased, Health and Safety Executive, TSO (The Stationery Office), 2018

- 3.13.1. An invasive procedure is any procedure that involves the breaking of skin or the opening of bodily cavities.
- 3.13.2. In some circumstances it may be necessary for the funeral director to perform an emergency invasive procedure with the intent of preserving the deceased to a good standard.
- 3.13.3. In the event of these circumstances occurring the funeral director must make reasonable attempts to contact the client and explain the circumstances in advance of performing the procedure.
- 3.13.4. It is the responsibility of the funeral director to ensure that those performing emergency invasive procedures are adequately trained/qualified to do so and are meeting the necessary health and safety requirements.
- 3.13.5. In every case the funeral director must keep an accurate record of the circumstances and the procedure carried out. This record must be made available to inspectors on request.

### 3.14. Refrigeration

- 3.14.1. Refrigeration is a critical element of caring for a deceased person in a dignified, appropriate and respectful manner.
- 3.14.2. The funeral director must have on their premises, or have access to, clean and appropriate refrigeration facilities to store the deceased in their care. Where refrigeration is provided by a third party a SLA must be in place. Each SLA must be reviewed regularly and at least once per year. Where refrigeration is being carried out by a third party the funeral director must clearly and sensitively inform the client of that fact.
- 3.14.3. Refrigeration can be a purpose-built refrigeration unit or temperature controlled cold room. Refrigeration units and cold rooms must be kept between 4 – 7 degrees Celsius.
- 3.14.4. The required refrigeration capacity that a funeral director must have on their premises, or have access to through a SLA, should be sufficient to accommodate persons received into the funeral director's care. A funeral director must review their refrigeration capacity at least once per year.
- 3.14.5. Each deceased person must be stored individually in separate compartments (e.g. a separate rack shelf or drawer) within the unit or cold room.
- 3.14.6. Refrigeration units must be in a locked and secure location. Cold rooms must be locked and in a secure location.

### 3.15. Viewing of the deceased

- 3.15.1. The funeral director must provide clear information to the client about whether they provide viewing of the deceased as standard. This will enable the client to make an informed decision about whether or not they would wish to view the deceased.
- 3.15.2. If viewing is not normally offered as part of a service, for example where the funeral director only offers direct cremation, the funeral director must make it clear to the client, before the client engages their services, that viewing is not included as standard. If the client subsequently requests to view the deceased the funeral director is to take steps to facilitate a viewing where possible, for

example by agreement with another funeral director to use their viewing facilities. Any additional costs for facilitating viewing should be made clear to the client before that service is provided, in accordance with the Competition and Markets Authority (CMA) Funeral Markets Investigation Order 2021.

- 3.16. Viewing areas must be fit for purpose, private, clean, regularly inspected and well-maintained.
- 3.17. Prior to any viewing the funeral director must ensure that the identity of the deceased is checked to ensure that the correct deceased person is shown to the visitor and that regard is given to requests made by the client such as: make-up application, if the coffin is closed or left open, who can be permitted to view the deceased, etc.
- 3.18. The funeral director must ensure that bereaved persons are afforded privacy when viewing the deceased. The funeral director or another trained and competent member of their staff must remain near and 'on hand' to answer any questions or requests.
- 3.19. In some circumstances viewing the deceased may not be recommended by the funeral director or some restrictions may have to be put in place such as viewing behind glass.
- 3.20. In circumstances where the funeral director advises against viewing entirely the funeral director must provide the client with sensitively worded advice setting out their reasons and make every effort to support the wishes of the client in relation to that advice. The funeral director must keep a record of this advice.
- 3.21. Where the funeral director has advised against viewing but the client does not accept that advice the funeral director must keep a record of this.

#### **4. Planning the funeral service according to the wishes of the deceased and the bereaved**

- 4.1. Deceased and client identification and who can be involved in making arrangements
  - 4.1.1. The funeral director must ensure that they and their staff are sufficiently knowledgeable and experienced to explain to the client the goods and services they offer and how the deceased is cared for. This must include an ability to describe, both orally and in writing, the range and location of options for burial and cremation if requested.
  - 4.1.2. The funeral director must provide the client with clear and comprehensive descriptions of their goods and services, and how the deceased is cared for by them in the provision of those goods and services.
- 4.2. Estimates and confirmations
  - 4.2.1. To enable the client to make an informed decision about the goods and services they would like, funeral directors are already required to comply with the requirements set out in the CMA Funerals Market Investigation Order 2021 and any other relevant legislation.
  - 4.2.2. Once the client has made a decision about the goods and services they would like, the funeral director should:

- a. Provide written or electronic confirmation of the funeral arrangements and a written or electronic itemised estimate of all funeral charges including third party fees (disbursements) where known.
  - b. Provide the client with a written or electronic itemised final account that is comparable with the estimate provided.
- 4.3. All changes from estimate to final bill should be clearly described, prior notified and agreed to by the client. The funeral director should be able to account for any changes via an audit trail.

## **5. Delivery of the funeral**

- 5.1. The funeral director is responsible for managing the delivery of the funeral according to the wishes of the client, including:
  - 5.1.1. When instructed to do so by the client making bookings, for example of the requested venues, church, celebrant and catering.
  - 5.1.2. Ensuring that the client has completed the required statutory forms and that these forms are sent to the appropriate statutory authorities in good time.
  - 5.1.3. Keeping and updating records and documentation and ensuring that the client's requests for goods and services are recorded accurately including any changes made to the client's requests or instructions.
  - 5.1.4. Ensuring that the deceased is presented in accordance with the wishes and instructions of the client as far as reasonably practicable.
  - 5.1.5. Managing donations appropriately, transparently, and as requested by the client.
  - 5.1.6. All funeral directors must have a written policy in place for managing donations which is understood/known by staff and is readily accessible to the client.
- 5.2. The funeral director must keep the following records which are accessible by authorised personnel only:
  - 5.2.1. A record of all the funerals provided including requested services, estimates and invoice.
  - 5.2.2. A record of the advice given to clients in relation to viewing the deceased and the outcome of the advice.
  - 5.2.3. A record of the management and handling of any ashes.
- 5.3. Ashes
  - 5.3.1. The funeral director must have a written ashes management policy in place setting out how they will arrange for return or disposal of ashes.
  - 5.3.2. The funeral director must ensure the careful and appropriate storage, handling, recording and dignified management of ashes.
  - 5.3.3. All records relating to ashes must be kept by the funeral director. Where a record contains data about a client who is still living these must be kept in accordance with the UK General Data Protection Regulation and the Data Protection Act 2018.
  - 5.3.4. At a minimum an ashes management policy must cover:

a. Procedures for:

- ashes storage in a designated, locked, clean, dry and well maintained location.
- ashes and the cremation certificate to be stored together.
- recording each individual set of ashes.
- splitting of ashes including the transfer of ashes from one container to another.
- transfer or release of ashes including procedures for contacting the client and obtaining identification prior to the release of ashes to the client.
- reporting lost or damaged ashes to appropriate management.
- keeping a record of the scattering or interment of ashes if undertaken by the funeral director, and
- keeping a written audit trail of all actions taken with the ashes.

b. The following matters:

- a clear description of the options available to the client e.g. scattering, interment, retention in an urn.
- adequate safeguards to ensure ashes cannot be combined with other(s) i.e. only preparing one set of ashes at a time.
- provision for a change of instruction by the client in respect of ashes.

## 6. Complaints

6.1. The funeral director must have a written complaints procedure. The complaints procedure must be available on the funeral director's website where this exists or must be made available as soon as reasonably practicable in paper or electronic form on request.

6.2. In the event of a complaint the complaints procedure must be followed and must include:

6.2.1. Advice for the client on how to make a formal complaint.

6.2.2. The funeral director's procedures for dealing with a complaint and timescales for response.

6.2.3. A requirement that any complaint resolution or answer will be provided in writing to the client.

6.3. In the event of a complaint made against the funeral director the client may

6.3.1. Raise a complaint with the funeral director directly. The funeral director must genuinely attempt to seek a resolution in a reasonable amount of time.

6.3.2. Raise a complaint with a trade association to which the funeral director belongs if applicable.

## **7. Business continuity and managing risks**

- 7.1. The funeral director must prepare and maintain a written contingency plan which contains provisions about:
  - 7.1.1. Dealing with any unexpected increase in the number of deaths.
  - 7.1.2. Contingency arrangements for any unexpected disruption to or loss of services.
- 7.2. When drafting and reviewing this plan, where possible, the funeral director must engage with third parties such as: local crematoriums and burial grounds, other funeral directors and their relevant NHS Board.

# MANDATORY ENHANCED REQUIREMENTS OF THE UK FUNERAL DIRECTOR CODE

## INTRODUCTION

The following NAFD Enhanced Requirements are designed to complement and build upon the foundational standards set out in the core Funeral Code above. While the core Code establishes essential principles and minimum expectations for safe, respectful, and lawful funeral service delivery, the Enhanced Requirements represent a higher standard of professional conduct, care, and accountability expected from members of the NAFD.

These enhanced measures do not replace the core Code but are to be read alongside it. They mirror the structure and themes of the core Code, extending its provisions with added safeguards, clarity, and rigour. Where applicable, they introduce detailed practices that improve transparency, client protection, and dignity for the deceased. By adopting these Enhanced Requirements, funeral director members of the NAFD demonstrate a commitment to excellence and leadership in the profession.

Moreover, enhanced requirements serve to build public trust and confidence in member organisations by ensuring transparency, quality, and respect in every interaction. They will distinguish members as leaders in the sector and prepare organisations to meet future regulatory expectations with resilience and professionalism.

Wherever you see an asterisk (\*) followed by a red number, it refers to the corresponding clause of the Code displayed above.

### **\*2.Engagement of the funeral director and transfer of the deceased**

#### **2.1. Transfer of the deceased into the funeral director's care**

- 2.1.1. Before taking a deceased person into your care you must establish that your contractual client has authority to instruct you and that your contractual client has given consent for you to act.
- 2.1.2. Each deceased person must be identified using at least three unique identifiers e.g. full name, date of birth, date of death, the address from where the deceased will be transferred from or your reference number. This information should be recorded and affixed to the deceased person via, for example a wristlet.

### **\*3.Care of the deceased and premises used by the funeral director**

- 3.1. Each deceased person must be stored appropriately and in a way that takes into account Health and Safety Executive (HSE) Guidance – Managing Infection Risks when Handling the Deceased: Guidance for the mortuary, post-mortem room and funeral premises, and during exhumation.
- 3.2. The exterior of all buildings and the interior and exterior of all vehicles shall be clean, well maintained and appropriate for the provision of funeral services.
- 3.3. You have access to suitable facilities and equipment to enable you to care for deceased people you take into your care. All care of the deceased must take place in a location(s) specifically chosen and accessible for that purpose.

- 3.4. You have access to sufficient space to appropriately store every deceased person you take into your care.
- 3.5. Each deceased person must be identified using at least three unique identifiers e.g. full name, date of birth, date of death, the address from where the deceased will be transferred from or your reference number. This information should be recorded and affixed to the deceased person via, for example a wristlet.
- 3.6. You have suitable systems in place to ensure all deceased people in your care can easily be identified by any inspector without any assistance from staff.
- 3.7. In addition, the Funeral Director must keep the following records which are accessible by authorised personnel only:
  - 3.7.1. A record of all the funerals provided including requested services, estimates and invoice.
  - 3.7.2. A record of the advice given to clients in relation to viewing the deceased and the outcome of the advice.
  - 3.7.3. A record of the management and handling of any ashes.
- 3.8. Care practices
  - 3.8.1. To maintain dignity and confidentiality, personal mobile phones, cameras, and recording devices must not be used or taken into areas where the deceased are stored or cared for, unless expressly authorised by the business (the Member) and with appropriate records maintained to ensure no impropriety has occurred. This extends to videos and photographs and the sharing of such on unsecured networks.
  - 3.8.2. Those responsible for physically caring for the deceased people in your care are appropriately trained and competent to do so.
  - 3.8.3. You must maintain an incident escalation protocol including reporting, tracking, investigation, and resolution of events affecting dignity or care of the deceased.
- 3.9. First offices
  - 3.9.1. You seek to understand your client's preference in relation to first offices at the earliest opportunity.
- 3.10. Emergency invasive procedures
  - 3.10.1. If there is insufficient time to seek the consent of your client in advance of any invasive procedure, a clear record of the circumstances and procedure carried out must be kept and made available to inspectors on request, and the client informed at the earliest opportunity.
    - a. In the event of these circumstances occurring, you must make reasonable attempts to contact the client and explain the circumstances in advance of performing the procedure.
    - b. You maintain a written or electronic record of the reason(s) why the client's consent was not obtained.
- 3.11. Refrigeration
  - 3.11.1. A temperature monitoring routine must be in place for all on site refrigeration, and the results must be documented.

## **\*5.Delivery of the funeral**

- 5.1. You treat your clients and prospective clients fairly, with respect and dignity, keeping in mind that some will be vulnerable.
- 5.2. You have the resources, skills and procedures to carry out any instructions you accept.
- 5.3. The service you provide to clients is competent, delivered in a timely manner and takes into account each client's needs and circumstances.
- 5.4. Donations should be stored securely when in your care.
- 5.5. You give your clients and prospective clients sufficient information to allow them to make informed decisions about the services they need and the options available to them.
- 5.6. Your full pricing information (including an explanation of third-party costs) is made available clearly at both your funeral home(s) and, where you have a website, online.
- 5.7. Your clients receive full and clear information, both at the time of engagement and when appropriate as their funeral arrangement progresses, about the likely overall cost of the funeral.
- 5.8. Prospective clients are made aware that they are personally responsible for ensuring they are legally entitled to make the funeral arrangements.
- 5.9. You take all reasonable steps to avoid becoming embroiled in family disputes and conflict situations.
- 5.10. The pricing information for your business is complete and up to date.
- 5.11. Ashes
  - 5.11.1. Cremated remains/ashes are never withheld for the purposes of securing payment for goods or services.
  - 5.11.2. You should report lost or damaged ashes to appropriate management, your client, trade body and any other regulator.

## **\*6.Complaints**

- 6.1. Your client must be provided with details of a certified Alternative Dispute Resolution (ADR) body and a commitment to use that ADR body to resolve any client complaints that cannot be resolved locally.
- 6.2. Client complaints are dealt with promptly, fairly, openly and effectively.
- 6.3. There must be a formal policy of openness with clients regarding serious incidents or mistakes, in line with professional and legal obligations.
- 6.4. There must be a documented process to handle discrimination complaints.

## **\*7.Business continuity and managing risks**

- 7.1. You have a clear and effective governance structure and reporting lines.
- 7.2. You have effective systems and controls in place to achieve and comply with all the principles rules and outcomes of this Code.

- 7.3. You train individuals working in the business to maintain a level of competence appropriate to their work and level of responsibility.
- 7.4. You have adequate and appropriate professional indemnity insurance cover for you, your practice and your employees.
- 7.5. You identify, monitor and manage risks to comply with all the principles, rules and outcomes of this Code, if applicable to you, and take steps to address issues identified.

## **8. Publicity and the ethical procurement of business**

- 8.1. Your publicity in relation to your business is accurate and not misleading and is not likely to diminish public trust in the funeral directing profession and/or related services.
- 8.2. Your publicity relating to charges is clearly expressed and identifies whether disbursements are included.
- 8.3. You do not make unsolicited approaches in person, by telephone or through a third-party agent to members of the public in order to publicise your business (e.g. through selling funeral plans) or another business.
- 8.4. Clients are informed of any financial or other interest which an introducer has in referring the client to you.

## **9. Training and professional development**

- 9.1. You and your/their staff keep a personal development record and take responsibility for your continued learning.
  - 9.1.1. Any staff or subcontractors responsible for caring for bereaved people are equipped with the skills and knowledge necessary to do this.
  - 9.1.2. Any staff or sub-contractors responsible for caring for deceased people are equipped with the skills and knowledge necessary to do this.
  - 9.1.3. Any staff responsible for ensuring compliance with legal and conduct obligations are equipped with the knowledge necessary to do this.

## **10. Equality, diversity and inclusion**

- 10.1. You and your staff do not discriminate unlawfully or victimise or harass anyone in the course of your professional dealings.
- 10.2. You make reasonable adjustments to ensure that disabled clients, employees or managers are not placed at a substantial disadvantage compared to those who are not disabled, and you do not pass on the costs of these adjustments to these disabled clients, employees or managers.
- 10.3. Complaints of discrimination are dealt with, promptly, fairly, openly and effectively.

## **11. Confidentiality and data protection**

- 11.1. You comply with data protection obligations under the General Data Protection Order.
- 11.2. You keep the affairs of clients confidential unless disclosure is required or permitted by law or the client consents.

- 11.3. You keep the affairs of deceased people for whom you have cared confidential unless disclosure is required or permitted by law or the relevant client consents.
- 11.4. You have effective systems and controls in place to enable you to identify risks to client confidentiality and to mitigate those risks.

## **12. Working with your regulators**

- 12.1. You notify the relevant regulators promptly of any material changes to relevant information about you including, the opening of a new branch or operational premises, the closure of an existing branch or operational premises, any action taken against you by another regulator, including non-sector specific regulators such as the ISO and HSE and any serious failure to comply with or achieve the principles of this Code.
- 12.2. You co-operate fully with your regulators at all times, including in relation to any investigation into your compliance with this Code.
- 12.3. You comply with any written notice from your regulator and any independent organisation overseeing complaints against you.
- 12.4. You co-operate with your regulators' inspection and compliance monitoring processes and grant access to all areas of your business premises necessary for the carrying out of regular announced and unannounced inspections.
- 12.5. You co-operate with your regulators' self-reporting requirements and ensure that all information provided is full and accurate to the best of your knowledge.

## **13. Standard Operating Procedures**

- 13.1. Members must be able to demonstrate clear procedures and documentation for the following areas:
  - 13.1.1. Staff and Personnel
    - 13.1.1.1. A register of authorised personnel responsible for collecting, transporting, and preparing the deceased, and for assisting during viewings.
    - 13.1.1.2. Records of any casual or temporary staff engaged in removals and transfers, including signed confidentiality agreements.
    - 13.1.1.3. Up-to-date out-of-hours rotas, with a log of any staffing changes affecting removals and transfers.
    - 13.1.1.4. Written lone-working policies and procedures.
    - 13.1.1.5. Written employee whistleblowing policy and procedures.
  - 13.1.2. Visitors and Contractors
    - 13.1.2.1. All visitors and contractors should state the purpose of each visit.
    - 13.1.2.2. All visitors and contractors should be accompanied at all times.
  - 13.1.3. Mortuary and Chapel Security
    - 13.1.3.1. A system to identify and flag deceased individuals with identical or similar names.

13.1.3.2. Defined processes outlining who may enter the mortuary or chapels of rest and under what circumstances.

13.1.3.3. Secure doors and access points to chapels of rest.

13.1.4. Embalming, Audit, and Risk Management

13.1.4.1. Comprehensive records should be maintained for all embalming procedures, including the date each procedure was carried out. Where a trade embalmer is used, their full details must also be recorded.

13.1.4.2. Documented evidence of regular internal audits and comprehensive risk assessments, which include evidence of robust security measures to safeguard and protect the deceased.

These measures collectively ensure transparency, accountability and the highest standards of care across all aspects of the operations of members of the National Association of Funeral Directors