



UK FUNERAL DIRECTOR CODE

Frequently Asked Questions

National Association of Funeral Directors

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FREQUENTLY ASKED QUESTIONS

Why did NAFD add Enhanced Mandatory Requirements to the core code? Was anything wrong with the core code?

No. The core code remains sound. The sector is evolving, client expectations are changing, and standards will continue to develop. The enhanced requirements build on the statutory foundation and reflect learning from the Scottish process and previous NAFD codes, to ensure we continue to move standards forward.

What exactly is the “core code” and what is NAFD adopting?

The core code mirrors the Scottish statutory code word for word, with Scottish-specific references removed. This gives the UK a single shared foundation. NAFD and SAIF agreed to this joint approach so members can work to one professional standard across the UK.

So what are the Enhanced Mandatory Requirements?

They are NAFD’s additions that sit on top of the core code. They reflect existing NAFD standards and raise expectations in areas such as transparency, record keeping, care of the deceased, training and governance. They are mandatory for NAFD members and demonstrate going beyond the baseline.

When does the new UK Funeral Director Code take effect for members?

There is a transition through the end of the year. From 1 January next year, the UK Funeral Director Code will be the single code that applies, with a twelve-month bedding-in period to support implementation.

Why base a UK-wide code on the Scottish statutory code?

Scotland is the only part of the UK with a statutory code and so provides an opportunity for a UK wide standard to be developed providing confidence and transparency for consumers and consistency for member businesses.

Does “fully trained” have a defined level?

Not yet at a single fixed level. Training should be appropriate to the specific role. NAFD provides programmes, qualifications and CPD via NAFD Inspire, and will share further guidance as it develops.

How will compliance be policed, and do we have enough inspectors?

Inspection will continue as now. NAFD has three Standards and Quality Managers (SQM), with a fourth joining toward the end of November to complete the team. The approach is supportive and collaborative.

During the bedding-in period, what happens if we are not yet fully compliant?

Inspections will flag advisories and any non-compliance, and SQMs will work with you on reasonable timescales to resolve issues. It is a supportive process, not a punitive one.

Are the Enhanced Mandatory Requirements only for NAFD members?

Yes. The core code applies as the foundation. The Enhanced Mandatory Requirements are part of NAFD membership expectations.

Will visits be scheduled or unannounced?

No change from current practice. Most will be unannounced. If a visit is scheduled, there will be a specific reason.

Are template policies, procedures and forms available?

Yes. A suite of Word templates will be available, along with a supplementary practical guide to the Code and these FAQs. All will be hosted on NAFD Inspire. If you need help accessing Inspire, National Office will assist.

Is there a supplementary practical guide to help us evidence compliance?

Yes. The guide includes the Code in full, practical guidance on evidencing each section, and a summary of what SQMs will inspect against. It is designed for day-to-day use.

What is the position on personal mobile phones in mortuary or care areas?

No personal phones or recording devices should be used in care areas unless specifically authorised by the business within its policy. Business-authorised CCTV is compatible with the Code, provided GDPR controls are in place.

Are cold rooms acceptable, or must we have cabinet refrigeration?

Cold rooms are acceptable. While the core code refers to refrigeration, it is not limited to cabinet units. A properly managed cold room is compliant.

Do we need refrigeration space for every person in our care?

No. You must have sufficient appropriate refrigeration for those who require it. Embalmed individuals resting in suitable, dignified spaces do not require refrigeration and should not be counted in a simple “per person” fridge capacity tally. The key is not exceeding dignified capacity.

Must each person have an individual bay if we use a cold room?

A cold room with appropriate racking and individual trays is compliant. Each person must have a dignified, clearly identified resting place within the refrigerated unit.

What counts as an emergency invasive procedure versus normal first offices?

First offices, including suturing and feature setting, are considered part of day-to-day care with appropriate consent and records. Emergency invasive procedures are different; examples include aspiration for tissue gas or gastric swelling.

Is pacemaker removal an emergency invasive procedure?

The view expressed was that pacemaker removal is not an emergency invasive procedure. It is one of the tasks that may need to be undertaken as part of normal care and legal compliance before cremation.

What if a person has a hazardous implant and the client refuses the removal of it?

Cremation cannot proceed if a hazardous implant remains in place and the crematorium is aware of it. This may affect the planned cremation until the issue is resolved.

What identifiers must we use when taking someone into care?

Use at least three unique identifiers, for example full name, date of birth, date of death, or collection address, and ensure they are securely attached and recorded, such as via an identification wristlet.

How do we handle authority and consent for transfer, especially out of hours from care homes?

The Code requires establishing client authority and consent before transfer. Where a nursing home makes the call at night, there may already be recorded consent on file. NAFD will provide further clarification on this point and members are invited to send specifics so the guidance reflects real-world scenarios.

Do we need verification of death before transfer?

Yes. Verification should be by a suitably qualified professional. Many firms already ask about verification before bringing someone into care and collect evidence at collection. We also recognise that this might not be the same across the whole of the profession and whilst we consider it best practice, guidance will be sought elsewhere on this issue.

What are the expectations around ashes management?

You must have a written ashes management policy, maintain secure storage with the cremation certificate, keep a full audit trail, and provide clear options and information to families. If ashes are ever lost or damaged, inform the client and relevant parties promptly and manage the incident transparently.

If ashes are damaged or lost in our care, should we also inform the crematorium?

For our Scottish members, there is a requirement to inform the crematorium. Following the guidance provided by the Federation of Burial and Cremation Authority (FBCA) for England, Wales and Northern Ireland there would be no obligation to inform the crematorium, although it would be useful for the member to advise them if there is to be a burial or scattering of ashes. If ashes require drying out (such as those that have been exhumed), they

are usually dried out in the empty cremator overnight in a tray prior to being placed in a container.

What about complaints handling and Alternative Dispute Resolution?

You must have a clear written complaints procedure, act promptly and fairly, confirm outcomes in writing, and give clients information about an approved Alternative Dispute Resolution (ADR) body, demonstrating a genuine commitment to use ADR if needed. Openness about serious mistakes is required.

What governance and risk controls does the Code expect?

Businesses should have a clear management structure, defined reporting lines, robust systems and controls, suitable professional indemnity insurance, and proactive risk management. Training must maintain competence for each role.

What are the rules on advertising and public information?

All publicity must be accurate, clear and never misleading, with transparent pricing that makes third-party fees explicit. No unsolicited approaches to promote services or plans. Clients must be told if an introducer has any financial interest.

What about equality, inclusion and data protection?

There must be no discrimination, harassment or victimisation. Reasonable adjustments must be made and must not incur extra costs to those affected. GDPR compliance and confidentiality safeguards are essential, with systems to identify and reduce risks to personal information.

What are the expectations for premises access and security?

Keep clear records of authorised staff and rotas, have loan-working and whistle-blowing policies, and tightly control mortuary and chapel access. Keep detailed records for all invasive procedures and evidence of audits and risk assessments. Visitors and contractors must declare their purpose and be accompanied.

Is there a requirement to co-operate with regulators and report significant changes?

Yes. You must notify regulators of significant changes, cooperate with investigations and inspections, provide access when required, and ensure any self-reporting is complete and accurate.

What about preparedness and resilience for disruption or surges?

Maintain a written contingency plan so essential arrangements continue with dignity even during crises. Collaboration with local crematoria, burial grounds, other funeral businesses and health boards is encouraged. NAFD will continue sector work on contingency, including through programmes like Project Pegasus.

Will NAFD and SAIF launch the code together publicly?

Yes. Membership communications are handled by each association, but any external launch will be collaborative and unified.

Can an SQM visit a one-person business to help get ready?

Yes. SQMs will assist and guide any member, including one-person firms, through becoming compliant with new procedures.

What about firms outside any trade association?

NAFD sets high standards for its members to ensure that their clients can always feel confident about the service they will receive and the care provided for their loved ones. It is our opinion that all those providing funeral services should be expected to operate to the same high standards we expect of our members. This should be achieved by the introduction of a statutory code of practice, compulsory registration, and oversight by a competent regulatory body. The shared UK Code is a significant first step toward a regulatory oversight regime that works for everyone.

Where will all supporting materials be available?

The supplementary practical guide, templates and these FAQs will be available on NAFD Inspire. If you need registration help or your unique code, contact National Office.