

Appendix P: The level of quality in the funeral directing sector

1. In this appendix we present some of the detailed evidence on funeral director quality that is discussed in the main report. The great majority of this appendix relates to back of house quality.

Front of house quality – customer feedback

2. Co-op sends questionnaires to all customers (and achieved a 24.6% return rate in 2018). The ‘Funeral Excellence Score’ (a weighted composite of various question responses), averaged across funeral homes from 2013 to 2018, was 93 out of a possible 100, with 81% of funeral homes achieving a score of 91 or more (Co-op’s target).¹ In 2018, the proportion of consumers that were very satisfied with the service received was over 90%, and Co-op’s net promoter score² was also over 90%. Complaint logs held by Co-op related to around [redacted] of funerals they conducted.
3. Dignity carries out a wide range of monitoring of customer satisfaction, with relatively high response rates. This shows consistently high rates of satisfaction across time and location – for example, the April 2019 survey found that 97% of customers would definitely (89%) or probably (8%) recommend its services to others. In 2018, Dignity conducted around [redacted] funerals (including Simplicity and through contracts such as public health funerals for councils) and received [redacted] complaints in relation to the funerals conducted during the year.³
4. Funeral Partners’ ‘reflective comment cards’ (sent to all customers, with a [redacted] response rate⁴) show satisfaction levels of [redacted] across all questions asked, covering initial contact, the funeral arranging process, and the day itself.

¹ There are six questions that make up the FES score. Individual questions are scored on a scale up to 15 or 25, and the overall FES is scored on a scale up to 10072. [redacted].

² Net Promoter Scores (NPS). Customers are asked to rate how likely they are to recommend our services on a scale of 0 = ‘very unlikely’ to 10 = ‘very likely’. NPS is calculated by subtracting the percentage of customers who scored 0 to 6 from the percentage of customers who scored 9 or 10.

³ [redacted].

⁴ Data for October 2018 to May 2019.

Back of house quality

Introduction

5. In this section we provide details of the evidence we have on quality outcomes in the back of house aspects of funeral director services.
6. The section is organised as follows:
 - (a) A brief summary of what industry participants consider to be minimum standards in relation to back of house quality;
 - (b) comments we received from funeral directors, embalmers and others in the industry, about the extent of problematic less observable quality in the industry, and examples from complaints data to illustrate what might be the consequence of poor back of house standards;
 - (c) a summary of the evidence received that is specific to refrigeration, which was frequently cited by industry participants as a necessary minimum facility;
 - (d) evidence from the Scottish Inspector of Funeral Directors;
 - (e) evidence from NAFD and SAIF audits, and commentary on the effectiveness of the existing schemes; and
 - (f) a summary of what we have been told about qualifications and training in the industry.

Framework for thinking about minimum standards

7. We have sought to understand the type of issues that could constitute unacceptable levels of the back of house service quality, in the first instance by asking industry participants for their views. We note that there is some existing relevant legislation and guidelines, for example in relation to health and safety (covering matters such as manual handling and control of infectious diseases).
8. The following suggested minimum standards for back-of-house facilities and processes were variously mentioned by the large funeral directors and/or in the trade associations' codes of practice:⁵

⁵ See also [SAIF code of practice part 1 and part 2](#) ; and [NAFD code of practice](#).

- (a) Appropriate vehicles and equipment for transfer of the deceased;
 - (b) a mortuary including a preparation area and sanitised refrigeration, either onsite or nearby to the funeral director's branch;
 - (c) processes in place to ensure proper identification of the deceased and tracking of their possessions and donations;
 - (d) appropriate storage, handling and identification of cremated remains;
 - (e) if embalming is to be carried out on the premises of the funeral director (rather than carried out on the premises of an independent embalmer or other funeral director), appropriate facilities for embalming, including for the appropriate disposal of embalming fluids and biomedical waste, and ventilation.
9. Currently, the SAIF National⁶ code of conduct does not expressly require that funeral directors have access to refrigeration, while the NAFD Funeral Director Code (updated as from 15 October 2020) requires that funeral directors 'have suitable refrigerated mortuary facilities; or have access to suitable refrigerated mortuary facilities by virtue of an enforceable service level agreement with a third-party'.⁷ SAIF Scotland recommends one refrigeration space for every 50 deceased taken into the care of the funeral director per year.⁸
10. The remainder of this appendix is focused on the evidence we have received about possible poor back of house standards, primarily covering issues related to a clean and clinical environment,⁹ and the presence of a mortuary and preparation room, refrigeration, and embalming facilities (in the cases where embalming is performed on the funeral director's premises), and some evidence relating to the dignity of treatment of the deceased.

Comments on back of house quality levels

11. A number of funeral directors and other industry participants, including the trade associations, submitted to us that some funeral directors are, or may be, providing low quality back of house services, although only some were able to provide supporting evidence. Several highlighted the findings of the Scottish

⁶ SAIF code of practice, 7.4 states that: 'There must be well-appointed and well-maintained areas and facilities for the preparation of the deceased and the holding of bodies.'

⁷ [NAFD code of practice, O. \(2.3\)](#). The NAFD's previous code of practice did not expressly require its members to have access to nearby refrigeration.

⁸ [Funeral Director: Code of Practice – Consultation](#) (Scottish Government, June 2019), paragraph 40.

⁹ In relation to the overall nature of back of house facilities, 77% of respondents to Dignity's survey (when asked a specific question about it) said that as a minimum standard the deceased 'should be kept in a clean and clinical environment'. Dignity (2018), [Time to talk about quality and standards, page 42](#).

Inspector of Funeral Directors (which are discussed in a separate section below).

Comment and evidence from the Large funeral directors

12. Co-op argued that ‘the quality of service provided to consumers and the standard of care for their loved one is very inconsistent across the industry, with some funeral directors focusing on low prices at the expense of the quality of service and standard of care they offer [...]. In our view, the inadequate level of quality in the market, particularly for the unobservable aspects which take place behind the curtain, constitutes a market failure’.¹⁰ In support of this view, Co-op told us that it has received anecdotal evidence of poor standards in the course of mystery shopping exercises in preparing business cases for new openings.¹¹ For example:

‘[I]n our business case for expanding into [✂] is an independent funeral director whose main business is as a builder (as well as joiner, plumber and electrician) and the premises are at an unsightly builder’s yard. We are also aware that some funeral directors leave the deceased in the care of the hospital right up to a couple of days before the funeral in order to maximise the time in their [temperature controlled unit] to compensate for not having their own. Additionally, we have heard that some funeral directors will send a single staff member on a body transfer with incorrect equipment, thus relying on help from hospital and mortuary staff in order to transfer the deceased safely.’

13. We also note that Co-op itself has sometimes been criticised for its back of house standards – for example in media reports¹² and in a small number of whistleblowing reports from its own staff which alleged some serious shortfalls.¹³ Co-op itself has told us that: ‘... across the network, we have [✂]. We are completely honest about that. We recognise that. We do not enjoy reading those reports which are not at the standards we would expect.’ Co-op also told us that: ‘The fact that we measure, and if necessary uncover inadequate compliance allows us to manage and address it, rather than complacently assume all is well.’

¹⁰ [Co-op response to the issues statement](#)

¹¹ As well as some poor front of house facilities.

¹² [Daily Telegraph](#); [Scottish Sun](#); [Daily Record](#)

¹³ Co-op has a whistleblowing policy which advises colleagues to raise concerns with their line manager or with other internal contacts, but where they do not feel comfortable doing so, to instead use a whistleblowing number or online form operated by an external provider.

14. Dignity submitted that: ‘certain aspects of quality (such as care of the deceased and provision of safe mortuary facilities) may not be observable by customers. Lower quality suppliers may not, therefore, be supplying customers with the service that customers think they are receiving. Dignity believes that the CMA will find that there is sufficient evidence to support the introduction of minimum quality standards to address this issue, particularly in relation to unobservable factors.’¹⁴
15. Dignity also made comments based on its experience from past acquisitions. We note however, that there may be some bias in this sample if funeral directors planning to put their business up for sale are less likely to have invested in facilities which do not materially contribute to increasing the value of the business. Dignity told us that ‘it is aware from past acquisitions that there is significant variation across providers on the quality of care of the deceased. Not all funeral providers have suitable refrigeration, mortuary facilities, embalming facilities, clinical waste management, etc. The funeral providers that are known for poor quality of service also have lower costs and generally charge less to the customer. This is often because they have reduced back-of-house services (e.g. no embalming service) and / or limited staff (for instance, they use only one person in attendance when transferring the deceased). Dignity is aware of this being the case for some providers as [REDACTED].’ As noted above, many funeral directors do not consider embalming to be necessary and unlike Dignity, carry out very little (or will normally use trade embalmers, who may themselves have the necessary facilities or bring the necessary equipment to the funeral director’s premises).
16. Dignity did not provide detailed information on the quality failings detected at specific acquired branches. Dignity provided copies of the due diligence reports in relation to two large acquisitions (covering [REDACTED] that Dignity acquired from 2014 to 2018), which highlighted:
- (a) In relation to one acquisition, [REDACTED]; and,
- (b) In relation to another that [REDACTED]:
- [REDACTED]; and
 - [REDACTED].’
17. As with Co-op, Dignity has received some criticism from the media;¹⁵ we also heard a small number of criticisms from ex-employees and embalmers (see

¹⁴ [Dignity response to the issues statement](#)

¹⁵ Eg [Hardcash productions programme, which also related to Funeral Partners.](#)

for example paragraphs 36 and 37 below, suggesting below-standard back of house facilities in two parts of the UK). We identified some Dignity internal documents highlighting issues with certain back of house facilities (identified as a driver for relocating facilities), and Dignity itself noted that it could improve in some areas.

18. Funeral Partners submitted that its business model of acquiring 'independent' funeral directors put it in a good position to comment on quality in the sector, and told us that it finds 'that although many independent funeral homes [it] acquires have 'back-of-house' standards commensurate with Funeral Partners' quality, a number have lower standards. This means that, following acquisition, [Funeral Partners is] often required to invest heavily in 'back-of-house' practices and facilities.' Funeral Partners did not provide data on the frequency of different types of back of house problems, but told us that it had seen the following:
 - (a) Lack of any refrigeration facilities for the deceased;
 - (b) insufficient refrigerated storage capacity for the deceased leading to 'topping and tailing' of more than one corpse on single trays in busier times;
 - (c) lack of any mortuary facilities, with the deceased instead left on the floor until the client is ready to view;
 - (d) lack of any identification procedure for the deceased, increasing the risk of incorrect identification of the deceased;
 - (e) lack of any documented processes around the procedure for handling and storing ashes, increasing the risk of incorrect identification of ashes;
 - (f) compromises on the quality of care shown for the deceased not apparent to the consumer e.g. no lining in the coffin when the body is not to be viewed by a family;
 - (g) lack of appropriate vehicles and equipment for transfer of the deceased;
 - (h) lack of appropriate embalming facilities including, for example, appropriate drainage and ventilation.
19. Funeral Partners provided more detailed information in relation to regulatory compliance among its acquisitions, with significant proportions of them not being compliant with legislation (or good practice) relating to each of: minimum wages and working time, pensions, financial regulation relating to pre-paid funerals, fire safety, data protection, holiday pay, anti-corruption

safeguards, and fleet management. Fifty percent of acquisitions since February 2017 have had no formal commercial or clinical waste provision agreements.¹⁶

20. In relation to Funeral Partners' own standards, in a Funeral Partners staff survey [X] % of respondents answered 'yes' when asked if there is anything they feel prevents them from providing the best possible customer service. The most commonly cited barrier appears to be staffing and training levels.
21. Central England Co-op submitted (based on information from customer focus groups and feedback forms, competitor monitoring, funeral homes that it has acquired, feedback from staff that have previously worked for other funeral directors, and anecdotal evidence) that:
 - (a) '[N]ot all funeral directors maintain their funeral homes to a set standard or in a consistent manner';
 - (b) Some 'independents' have a 'lack of focus on health and safety for both colleagues and customers. This would be around there being no weight lifting guidelines, no vaccination programmes or any lifting equipment. [Anecdotally, employees] of these independents would be asked to move or dress a deceased alone, place them into their coffin alone or move the coffin into a visiting room without assistance.' '[Anecdotally, not] all funeral directors will send two colleagues to complete a transfer from a hospital or hospice and will expect one colleague to prepare and en-coffin a deceased alone without sufficient lifting equipment or help from another colleague.'
 - (c) Few funeral businesses will have implemented a deceased identification system such as theirs (which uses two identification wristlets detailing an individual unique identification number, name, address, place of death, date of birth and date of death).
 - (d) In funeral homes that it has purchased from 'independent' funeral directors, it has rarely been the case that there have been adequate care and preparation facilities. The temperature control units may be old or not working correctly and need replacing; the transfer equipment and scissor lifts need servicing or replacing; and embalming suites need building or upgrading. [Anecdotally, it] has also been custom and practice for some businesses to delay the collection of deceased from hospitals to minimise

¹⁶ Data for acquisitions between 2016 and 2018, except for fleet management and waste management where data is from February 2017 to May 2019.

the time they are kept on their premises if their temperature controlled unit capability is poor.

22. Co-op East of England submitted:

'It is our belief, based on mainly local knowledge and the fact that colleagues will on occasion call at competitors' funeral homes to bring a deceased into our care, that there are huge variations in the level of 'back of house' service that funeral directors provide that are not apparent to the customer before the customer enters into the contract.

For example, there are a number of predominantly local independent funeral directors who advertise based on 'price and service', but who as far as we are aware do not have the necessary body refrigeration facilities to maintain a deceased at the level specified by the HSE. This can lead to poor quality of presentation of deceased, customer dissatisfaction and increased risk of public health or disease control issues.'

23. Co-op Mid Counties submitted:

'While some funeral directors apply a high level of minimum standards similar to those utilised by professional medical sites, other funeral directors apply standards that we would not consider to be fit-for-purpose. For example, some funeral directors are not open with their clients about their lack of holding or viewing facilities, and strongly encourage their clients either to (i) remember their loved one as they were; or (ii) have the deceased brought into their domestic residence as a more personal goodbye.

Another variation is that not all funeral directors use purpose-built equipment, especially regarding vehicles. With no minimum standards, vehicle types can vary greatly and may not necessarily secure the deceased, or maintain their dignity while in transit, particularly when non-adapted private vehicles are being used. This may only become apparent to the client should they be in attendance when their loved one is collected from their place of death, otherwise they will be oblivious to the fact.'

24. Co-op Southern submitted:

'General poor quality [...] I have not really seen any evidence of and cannot say they are widespread at all to items that anyone

could physically see [...] Aspects of quality that are largely unobservable in the back of house operationally do differ considerably and potentially are a lot more variable than that of front of house. Given the lack of regulation and enforcement ability of the various trade associations the potential for differing standards of mortuaries, deceased care and handling, embalming, refrigeration, etc. do exist and could be below what customers would naturally expect.

25. CPJ Field submitted:

'[A]s with any sector, there are of course varying standard of care applied by different funeral directors [...]. We have witnessed unacceptably low standards of care in other funeral directors' practices, which have been particularly highlighted when [we have] acquired smaller funeral director businesses. This has been particularly noted in very small businesses which do not benefit from economies of scale, for example, in certain elements of the services or on-site facilities (eg mortuaries), and which fall below the size required for compliance regarding health and safety best practice, tax regulations and employment regulations.'¹⁷

Comments from the trade associations

26. We asked the two funeral director trade associations, the NAFD and SAIF, for their own views on the extent of poor practice in the industry.

27. SAIF told us:

'It is well known within the sector that there are different standards being applied in the care of the deceased. It is possible to hide bad practice in this area as the funeral director is trusted by the consumer and is regarded as an experienced and knowledgeable practitioner. Sadly, nothing could be further from the truth. The consumer generally believes what they are told by the funeral director and if they are advised not to see the deceased, they will generally take that advice. This allows the less professional funeral director to provide minimum and in some cases no care. Additionally, the introduction of direct cremation

¹⁷ CPJ Field response to the Market Study interim report

and low price, restricted service companies perpetuate this bad practice.’¹⁸

28. SAIF added that ‘correct care of the deceased is a paramount consideration for SAIF and great attention is paid to this area of our members work. In Scotland, SAIF has introduced measures to ensure our members have full and proper facilities to perform these duties.’ However, SAIF was unable to provide substantial supporting evidence for the point made in the preceding paragraph (given that its own regime does not cover all funeral directors).

29. Similarly, NAFD submitted that:

‘Irrespective of any action taken by the CMA to address any competition concerns identified by its investigation, the NAFD believes that the introduction of a system of proportionate and tailored statutory regulation of the funeral sector would be in the best interests of our members and the families they serve. [...] In our view, it is unacceptable that some firms are currently able to escape scrutiny by refusing to join a trade association. We are aware of a perception that the regulatory function of the major trade associations is incompatible with our separate role as advocates for our members. In spite of the many safeguards we have put in place to ensure the independence of our complaints, disciplinary and quality assurance procedures, we recognise that more needs to be done to ensure public confidence in our ability to enforce standards is maintained.’¹⁹

30. When asked for any evidence to support the view that poor practices exist in the industry, a representative from the NAFD told us:

‘I have gone around speaking to funeral directors who are our members, they will commonly speak about a local funeral director who is not an NAFD member or who is not a SAIF member, who they think is operating at an unacceptably low standard and they are completely out with any kind of regulation.’

¹⁸ SAIF response to the interim market study report

¹⁹ NAFD Response to Issues Statement

Comments from the Smaller funeral directors

31. Some of the Smaller funeral directors, including both established firms and new entrants, also argued that some funeral directors have poor quality back of house facilities. Comments included:
- (a) 'The unrestricted entry of large quantities of (largely) untrained, unqualified styles of businesses all eager to succeed has led to this race to the bottom attitude and a stripping out of 'behind the curtain' essentials, in the name of price. The education, training and any overwatch whatsoever, within the sector is shameful and until it is a statutory requirement the public trust in the profession, due to unscrupulous operators will continue to erode unabated.'²⁰
 - (b) '[I]t is understandable that a company with, for example, no mortuary facilities is able to charge less than one which has a full suite of specialist cold storage, and if the family understands the conditions in which the Deceased person will be kept as a trade-off for this, then this is perfectly acceptable. However, we have seen that the public largely believes in a unity of standards and therefore we need the CMA to convey how funeral directors are to explain these variations to a public which is not only ill-informed, but also unwilling (in many instances) to examine the care of the Deceased person in any detail. How we ensure the clientele understands that the playing field may not be level, when they do not wish to consider such matters, is an area which concerns us greatly.'²¹
 - (c) 'I feel we are in need of some form of regulating, as there are far too many new small start up businesses setting up by people who have very little, if any training, and no qualifications, often from inadequate premises, and no capital outlay. Due to these circumstances they are able to offer what appears to be very low cost funeral services. The problem is that the public do not see behind the scenes and therefore do not know what they are buying into.'²²
 - (d) 'Over the past few years we have seen the arrival of numerous alleged 'funeral directors' that have opened up throughout the country. They, in the main, have little or no experience [...] They have very little in the way of facilities, almost certainly no proper facilities for storage of human remains, such as refrigeration, no permanent staff, or vehicles. Bodies are left at civic mortuaries or hospital mortuaries until the day of the funeral,

²⁰ [Brodiess Funeral Services response to the Issues Statement](#)

²¹ [Freeman Brothers response to the Market Study interim report](#)

²² [Ian Hazel Funerals response to the Market Study interim report](#)

causing a considerable number of hospitals now to institute charging for any excessive delay in removal.’²³

- (e) ‘I think it is good to have regulation to some degree; you need it, because there are companies out there that are proper backstreet boys, really: they are set up, and they are not qualified, and their facilities are not really good; the front-of-house might look absolutely fabulous, but the back-of-house might be an absolute tip.’
- (f) ‘If [a] body ... has to be taken somewhere to be washed, attended, dressed, placed in a coffin, that should be done somewhere that – in a place that is intended for that purpose ... And that is not happening; that definitely is not happening at the moment.’

Comments from other industry insiders

32. We have received views from around 45 embalmers, through a call for comment after the publication of the interim market study, and a questionnaire sent out during the Market Investigation phase, as well as a small number of phone calls.
33. The issues raised included:
- Poor quality mortuary facilities (inadequate ventilation and/or drainage, poor standards of cleanliness, no clinical waste facilities);
 - inadequate storage facilities, including limited space, no or insufficient refrigeration, poor state of repair (both premises and equipment);
 - lack of knowledge of staff or poor training (about proper methods of care for a deceased body, removal of implants such as pacemakers, issues of poor standards of care and severe decomposition);
 - poor procedures, including in relation to identification of the deceased.
34. These views were also supported by a small number of submissions we received from celebrants and other industry insiders. Dignity also commissioned qualitative research with industry participants including coroners, hospice workers, doctors and others. These participants raised similar points.²⁴

²³ [C Bastock Funeral Directors response to the Market Study interim report](#)

²⁴ [Time to talk about quality and standards](#), p27. We note that the majority of these participants were identified by Dignity to the research agency (rather than “free-found”) and so while the research findings are relevant to our

35. We have heard specific concerns about some of Dignity's back of house facilities, in different parts of the UK.
36. One former Dignity employee at a service centre (hub) in [redacted] raised serious concerns with us about conditions for, and practices in, the treatment of the deceased. They identified issues in relation to:
- (a) Insufficient climate-controlled capacity during winter peaks, leading to some deceased being stored on trolleys, in a coffin or in a body bag in a non-climate-controlled environment;
 - (b) poor state of repair of the building and electrical systems;
 - (c) lack of proper lifting equipment;
 - (d) inadequate ventilation and PPE availability;
 - (e) falsification of records in relation to coffin weight;
 - (f) instances of failure to properly prepare the deceased or dress in own clothes as instructed, when dealing with very high volumes.
37. One former embalmer [redacted] submitted that, 'My experience was that the things that go on display such as the vehicles on funerals most removal vehicles and equipment was of good quality but the premises and behind the scenes were not fit for purpose in some cases.' They noted issues in relation to:
- (a) Poor maintenance of buildings;
 - (b) lack of training leading to poor practice in preparation of the deceased;
 - (c) insufficient climate-controlled or otherwise unsuitable mortuary facilities.

Customers' experience of viewing the deceased

38. In research commissioned by Dignity, the majority of people who viewed the deceased had a positive experience: 87% said they felt reassured that the funeral director was on hand to answer any questions, and 78% said the funeral staff prepared them for the experience, although 30% of those who viewed said they were shocked by their loved one's appearance (as even a body that has been cared for properly can change in appearance).²⁵

inquiry, we have placed limited weight on them, particularly insofar as they relate to the relative quality of Dignity's facilities compared with its competitors.

²⁵ [Time to talk about quality and standards](#)

39. We also looked at evidence from customer complaints. As part of the inquiry, we received copies of hundreds of customer complaints from the Largest funeral directors, trade bodies, and consumer organisations. For example, care of the deceased was raised in around 30 of approximately 200 customer complaints that had been made to the NAFD in 2018 that were dealt with by the Funeral Arbitration Scheme (FAS), while around [X]% of the complaints that Co-op receives relate to care of the deceased, and [X]% relate to the care of ashes. Dignity analysis suggests that care of the deceased is a concern in around [X]% of complaints it receives.

Evidence on refrigeration/storage

40. Given that refrigeration was frequently highlighted to us by interested parties as a minimum requirement, and it is an aspect that can be relatively easily assessed, we present below what we have heard about its prevalence in the industry.
41. The two trade associations do not at present monitor whether their members have access to nearby refrigeration.²⁶ However, the Largest operators provided some data on the prevalence of refrigeration in their own branches and in those they have acquired, and we also received a small number of responses from some of the Smaller funeral directors that we asked about their refrigeration facilities.
42. Among the Largest operators:
- (a) Co-op told us that all of its care centres, and [X]% of its funeral homes, have temperature-controlled units (TCUs). It went on to say: 'We instigated a programme of TCU installation in 2016 when we had circa [X]% network coverage and 2019 will see us achieve in excess of [X]% network coverage. The funeral homes that do not have TCU facilities (currently circa [X]%) have access to shared facilities at another local funeral home or care centre (less than [X]% where this is greater than 10 miles [...]). A proportion of these homes are too small to install TCU facilities on site.' Co-op submitted that it offers one refrigeration space for every [X] deceased (compared to the SAIF recommendation of one for every 50).
 - (b) Around [X]% of Dignity branches have on-site refrigeration facilities, while the balance ([X]%) use off-site refrigeration at other Dignity sites. Dignity told us that 'a number of locations have temperature-controlled environments as an alternative to refrigerated cabinets. However, where

²⁶ See paragraph 9 for details of recent changes to the NAFD Funeral Director Code in this regard.

possible, temperature-controlled rooms are being phased-out and replaced with refrigerated cabinets.’

- (c) Since 1 January 2014 Dignity has made [redacted] acquisitions (some with multiple branches). [redacted] of these acquisitions (87.5%) had an existing refrigeration facility. For the remaining [redacted] funeral director locations acquired without pre-existing refrigeration facilities, Dignity either installed new refrigeration facilities or arranged access to the refrigeration facilities at a nearby care centre.
 - (d) Of Funeral Partners’ [redacted] locations, [redacted] have on-site refrigeration facilities ([redacted]%). The remaining [redacted] locations do not have on-site refrigeration facilities but use the refrigeration facilities at their hub branch or a neighbouring branch ([redacted]%).
 - (e) Of the [redacted] branches that Funeral Partners acquired since 1st January 2014, [redacted] branches ([redacted]%) did not have any on-site refrigeration before acquisition.
43. Six of the sampled other funeral directors that we asked about their refrigeration facilities responded on this aspect. Within this group:
- (a) One told us that it has use of local hospital refrigeration facilities;
 - (b) one uses off-site refrigeration operated by a third party;
 - (c) four have on-site refrigeration facilities, with one of these noting that they may sometimes use off-site refrigeration (at another of its own locations) in times where requirements exceed on-site capacity.
44. All of the funeral directors at which we conducted site visits had refrigeration.
45. SAIF told us that among its membership in Scotland, SAIF has made access to refrigeration a requirement of its Code. The Scottish Government’s proposed Code of Practice will mandate Service Level Agreements with another provider where a business does not provide its own refrigeration.²⁷
46. We note that we have received some submissions criticising:
- (a) The practice of off-site storage (on the grounds that this is not what families expect, particularly over longer distances);²⁸

²⁷ [Draft code of practice consultation](#).

²⁸ Calls with individual customers [redacted] and [redacted]. We have also heard this in some site visits.

- (b) the use of large storage facilities (on the grounds that this is not respectful of the deceased); and
- (c) the amount of available refrigeration space, including at large funeral directors, and the use of 'temporary' refrigeration facilities (on the grounds that this does not maintain the correct temperature).

47. For example, one funeral director told us:

'When I went back to [X], they had spent £[X] completely refurbishing their fridges and everything: it looked wonderful, and every member of staff there thought it was a complete disaster, because they had gone from having space for about [X] to having space for about [X], and at the same time they had opened more branches.

So, there was constantly not enough room, and this was a genuine problem: having said everything I have just said, there was constantly not enough room. So, you would have, say, [X] proper fridges, state-of-the-art, and then, outside that, you would have temporary fridges, just racking with the blue curtains. And that was always completely full, and as soon as space came up in the main fridge people would be moved through, but just [X] fridge spaces for [X] branches is just not enough. If each branch has three funerals on the go, that is [X] deceased; what do you do with the other 100?

So, I would say in my experience at [X] at the moment it is almost guaranteed that, by the time a funeral comes, the deceased will be in a bad state, because the infrastructure does not support the capacity they have: they have nice fridges, but they do not have enough staff, they do not have enough space, and they do not have enough hearses, so you have lead-times of weeks and weeks and weeks.'

48. Dignity told us that it has refrigerated capacity for [X] body spaces, mainly in permanent refrigeration capacity, but with very small proportions also in temporary refrigeration or a temperature-controlled environment. This would imply a ratio of around one space for every [X] deceased for which Dignity performs the funeral.²⁹

²⁹ Based on a figure of 68,800 funerals carried out in 2017 ([CMA Market Study Final Report](#)).

49. In relation to this topic, Co-op provided some relevant information on the available refrigeration options, telling us that it chooses from three options, with this choice largely dictated by expected volumes and the physical space available. Co-op told us that in order of preference these options are:
- (a) Coldroom – an insulated cabinet capable of holding three deceased in either coffins on wheeled biers or on mortuary tables or both;
 - (b) Refrigerated cabinet – a single bay, 3 or 4 tier, cabinet capable of holding 3 or 4 deceased in either coffins or on body trays;
 - (c) Coolzone – a hybrid cabinet with two insulated side panels and roof and an insulated curtain to draw around the rest of the unit – primarily for use where space is limited but can also be set up to hold one deceased (in coffin or on mortuary table) or three deceased by adding adjustable wheeled racking and a hydraulic trolley.

Scottish Inspector of Funeral Directors

50. The Scottish Inspector of Funeral Directors³⁰ inspected 55 premises between August 2017 and June 2018³¹ as part of the Scottish Government's assessment of the appropriateness of licensing and regulation.³² These inspections covered:
- (a) Culture, ethos and confidence in management;
 - (b) conveyance and care of the deceased;
 - (c) understanding, recording and acting on the wishes of the deceased or bereaved, both pre-need and at-need;
 - (d) asset management; and
 - (e) audit of procedures, practice and record keeping.
51. In her first annual report the Inspector summarised the key themes and recommendations that she drew from those inspections.³³ Overall, the Inspector found 'that there are many areas of common practice across Scotland with a number of businesses developing areas of excellence.'

³⁰ The incumbent subsequently stood down. The Scottish Government stated in August 2019 that it was in the process of scoping out the role for a new Inspector.

³¹ This is approximately 8% of the 696 Scottish funeral director branches as at 1 June 2018. Source: [Inspector of Funeral Directors: annual report 2017-2018](#), pages 5 & 7.

³² The methodology used by the Inspector to select sites for inspection is not set out in the report. However, she does refer to a need to visit a variety of premises from large corporate facilities, multi-site locations to larger and smaller 'independents', in geographically diverse (urban and rural) locations.

³³ [Inspector of Funeral Directors: annual report 2017-2018](#).

However, she also identified ‘departures from common or good practice in relation to care of the deceased, record keeping, training and experience of staff, identity checks, authorisation and permissions.’ She concluded that her initial findings ‘do reinforce the need to establish an agreed and acceptable level of good practice through regulatory intervention, and to provide an independent source of reassurance to the public.’ This view was subsequently re-affirmed in the Inspector’s separate report to Scottish Ministers in August 2019 recommending the introduction of a licensing scheme for funeral directors in Scotland.³⁴

52. The Inspector’s recommendations (including recommendations made to individual premises) relate to:
- (a) Training and management: encouraging an environment of continuous improvement; working qualifications into a future development strategy; considering membership of a trade body to access support and information easily; identity checks not completed as outlined in procedural documents highlight the importance of periodic reviews and checks, and reminder training sessions; use of health and safety gear such as goggles in the embalming process under certain circumstances;
 - (b) Facilities: building in screens to ensure privacy of the deceased; purchasing appropriate equipment to transfer and care for the deceased appropriately; lockable ashes storage; screens in service vehicle for the privacy of the deceased; more secure means of restricting client families from accessing body preparation areas; designated, clean and secure ashes storage area required;
 - (c) Processes: a range of detailed recommendations in relation to record keeping (covering for example the recording of: the identification of the deceased, sales processes, the wishes of the bereaved).
53. We have also reviewed copies of the Inspector’s reports (where available).³⁵ The reports are narrative, do not cover the same points in every case, and to an extent become more detailed over time (as the Inspector carried out more inspections). In one report she found that the funeral director had no refrigeration, and in a small number of reports she indicated that she was

³⁴ [Report to Scottish Ministers on the introduction of a regulatory licensing model including Progressive Licensing scheme for Funeral Directors in Scotland](#)

³⁵ Reports provided to CMA by the Scottish Government in response to CMA information request.

'deeply concerned'³⁶ or 'very concerned'³⁷ or that her concerns were 'significant'.

54. The Inspector's advice most regularly focuses on internal processes for record keeping and documentation (tracking identity of the body and wishes of the family). There is no indication of whether this or other 'shortcomings' ever lead to poor service in providing funeral services themselves - ie actual harm to customers (as opposed to a risk of such).
55. Other features the Inspector often comments on are:
 - (a) General cleanliness, maintenance of different areas of the branch;
 - (b) staff knowledge of processes and their qualifications/training;
 - (c) storage of ashes;
 - (d) description of services and pricing to customers (although not covered in all reports).
56. We recognise that there is an element of judgement in raising concerns that relate to respect for the deceased. For example, in the reports, the Inspector:
 - (a) Notes on a couple of occasions that coffins / ashes are kept too close to or on the ground;
 - (b) cites an example of someone having to be forced into a coffin three inches too small;
 - (c) notes a preference that the deceased be screened off from view at all points;
 - (d) indicates that every deceased should undergo some degree of preparation, even if there will be no viewing;
 - (e) advises a funeral director to think about its refrigeration ability, with the possibility in mind of refrigeration becoming mandatory.
57. We also received from the Scottish Government summaries and details of complaints made to the Inspector of Funeral Directors, and complaints made

³⁶ In particular, the Inspector was concerned about not having appropriate tables and equipment for moving the deceased (subsequently rectified), and putting a 6 foot 3 person in 6 foot coffin (subsequently ordered a range of coffin sizes).

³⁷ In particular, the Inspector was concerned about lack of refrigeration, and lack of hot water and cleaning products in the mortuary.

about funeral directors' businesses to the Scottish Government Burial and Cremation Policy Team. There were 23 complaints in total in this set.

58. Of these complaints it appears that 8 related to quality-specific issues. These included:
- (a) Issues relating to the condition (deterioration) of the body;
 - (b) poor treatment of the body on collection/retrieval;
 - (c) issues with identification of deceased/remains.
59. The remainder of the complaints related to:
- (a) Fees; sales/appointment processes; memorials (6 complaints);
 - (b) issues with the carrying out of the funeral (2 complaints);
 - (c) other issues, or where the core issue was unclear (7 complaints).

NAFD and SAIF Audits

60. We summarise in Annex 1 the information that the NAFD and SAIF have provided about the nature and findings of their audits. However, we note that around 25% of funeral director branches are not members of a trade association and so are not subject to inspection by a trade association.³⁸
61. Key points are:
- (a) Until October 2020 the NAFD only monitored back-of-house quality on an 'advisory' rather than a compliance basis though the NAFD explained that, 'a serious breach would almost certainly constitute a breach of the Code of Practice, which would lead to a fail.' It has only recently (in 2019) begun collating data on compliance with its Code of Professional Standards (which covers back of house facilities).
 - (b) The NAFD launched a new Code of Professional Standards (COPS) in 2014, providing a framework for inspection of back of house facilities. However, this was an advisory code with no pass-or-fail system. In recognition that a more formal and rigorous process for monitoring standards is appropriate, the recording of Code of Professional Standards issues changed, in January 2019, to start moving towards a more centralised approach to monitoring and managing of these matters. This

³⁸ [Funerals Market Study Final report](#), paragraph 2.50

has been continued in the current NAFD Funeral Director Code (2020), which replaces NAFD's Code of Practice. The NAFD has advised that the Code of Professional Standards has been retired, except for the purposes of determining whether members can be sanctioned for code breaches, and from 15 April 2020, it will no longer be used at all.

Training in the funeral industry

62. We summarise in Annex 2 evidence on relevant qualifications and training in the funeral industry, and views on the need for more training. Some key points are set out below.
63. There are a number of relevant qualifications available to staff working in the funerals sector. However, there is no requirement to hold any of these qualifications to work as a funeral director or embalmer, or as a requirement of membership of either of the trade associations. Neither Dignity nor Funeral Partners require any of their employees to hold qualifications relating to funeral arranging and directing. Co-op incentivises its staff to take relevant courses. In relation to embalming, the three companies seem to place particular emphasis on formal qualifications.
64. In relation to other training, aside from formal qualifications, the Largest funeral directors have told us that they invest significant resources in training their staff to a high standard, as well as ongoing monitoring and support to drive up standards. We also heard that the trade associations aim to encourage quality through the dissemination of good practice.
65. Some funeral directors believe that there should be more or better training in the industry.

Annex 1

NAFD and SAIF Audits

NAFD inspections

66. NAFD conducted 7,502 inspections³⁹ in the four years to the end of 2018,⁴⁰ of which 12% were ‘non-compliant’ with the NAFD code of conduct.⁴¹ Table 1 shows the compliance factors on which firms are judged and the numbers failing for each reason – they largely relate to the provision of information and to complaints processes, and do not appear to include aspects connected to facilities or procedures that relate to back of house quality.⁴²

³⁹ Source: NAFD.

⁴⁰ The majority of these were random, but also covered new members, and new branches or locations for existing members. The NAFD inspects new members’ branches as part of the application process and then “randomly re-inspect[s] at the end of the first six months of membership, and every two years thereafter.” Therefore, the NAFD should inspect each branch of existing members approximately every 2 years. This is supported (assuming there are a limited number of repeat inspections of the same branch) by the number of inspections being approximately 181% of the 4,152 branches of NAFD funeral director members as of March 2019. Source: CMA analysis of NAFD data.

⁴¹ NAFD.

⁴² Source: NAFD.

Table 1: Sources of non-compliance in NAFD inspections, 2015 - 2018

<i>Non compliance area</i>	<i>Number non-compliant</i>	<i>% of branches inspected</i>
Disclosure of ultimate ownership in visible position on premises	43	0.6%
Disclosure of ultimate ownership on letterheads	11	0.1%
Full/detailed info (inc prices) on range of funeral services available provided	19	0.3%
Price lists available and on display	92	1%
Code of practice leaflets available and on display	240	3%
Funeral Arbitration Scheme ⁴³ leaflets available and on display	341	5%
Ensure client understands range of services offered, prices and disbursements	14	0.2%
Provides written Ts and Cs on which service will be provided	147	2%
Prices lists include itemised charges/descriptions of constituent parts of services and other services available	100	1%
Copies of price lists available to be taken away by clients/prospective clients	32	0.4%
Coffin/casket literature to include prices	31	0.4%
Coffin/caskets displayed include prices	21	0.3%
Provide written/itemised estimate including responsibility of client for funeral charges and written acceptance from the client	154	2%
Provides written confirmation of the funeral arrangements	52	0.7%
Provides client with detailed itemised final account comparable with estimate provided	91	1%
Displays NAFD/FAS logo so clearly visible from outside of premises	143	2%
Membership Inspection Certificate is clearly displayed in a public place	194	3%
Provides training to employees (where appropriate)	4	0.1%
Provisions of code/legal obligations to consumers explained to staff (where appropriate)	3	0%
Designated senior person in place to deal with complaints	20	0.3%
Formal written procedure in place to deal with complaints	380	5%
When submitting final account, client invited to comment on service received	309	4%
At least one area of non-compliance	918	12%

Source: NAFD

67. The NAFD's code of conduct and inspection reports do touch on back-of-house quality (and in recent years a small number of applicants were refused membership for reasons relating to their facilities), but until October 2020 the NAFD only monitored back-of-house quality on an 'advisory' rather than a compliance basis, though as explained in Box 1 below, 'a serious breach would almost certainly constitute a breach of the Code of Practice, which would lead to a fail.'⁴⁴ In 2019 it began collating data on compliance with its Code of Professional Standards (which covers back of house facilities). On 15 October 2020 the NAFD updated its code of practice as The Funeral Director Code, which will replace the NAFD Code of Practice. This code sets out mandatory principles and outcomes which NAFD members must comply with,

⁴³ See [NAFD webpage](#)

⁴⁵ [NAFD Funeral Director Code](#).

including requirements about funeral director's operational facilities and the way in which they care for the deceased.⁴⁵

68. NAFD inspection reports include space for comment on the following factors on which it did not previously collate compliance data, but which include both aspects observable to customers, and unobservable areas and procedures:
- (a) Facilities used by customers: reception, chapel of rest/viewing room, coffin showroom, toilet facilities;
 - (b) Other facilities: embalming theatre, mortuary, refrigeration, coffin workshop;
 - (c) Procedures relating to: collection, collation and distribution of donations; safe-keeping of cremated remains and records showing evidence of the client's requirements/instruction; safe-keeping of jewellery and personal possessions and evidence of the client's requirements/instructions; and identification of the deceased and tracking where the deceased is held.
69. The data collated on these factor so far by the NAFD shows 25 instances of non-compliance in 2019 (as of September). This is understood to represent a very small proportion of total inspections (in 2018 NAFD carried out over 1,900 inspections). The most common problems highlighted related to poor maintenance or cleanliness (eg observation of mould) of mortuaries or refrigeration units,⁴⁶ not obtaining signatures in relation to personal effects,⁴⁷ a lack of appropriate and designated areas for storage of cremated remains,⁴⁸ as well as other more varied concerns about the maintenance of external or internal areas.

⁴⁵ [NAFD Funeral Director Code](#).

⁴⁶ Eight instances

⁴⁷ Seven instances

⁴⁸ Five instances

Box 1: NAFD explanation of its monitoring of back-of-house standards as of August 2019

In response to public criticism about its effectiveness at maintaining standards, in November 2012 the NAFD undertook a review of its Code of Practice and inspection procedures. An external agency (VJB Memberlink) surveyed NAFD members (and achieved a return rate of approximately 30%). This was followed by an online survey and telephone/face-to-face interviews.

At the November 2013 Autumn General Meeting, NAFD members were presented with the feedback. It was subsequently agreed that ensuring compliance with the NAFD Code of Practice was no longer sufficient to meet public expectations relating to 'back of house' premises standards. A second Code, specifically covering back of house and operational issues, was therefore produced.

The NAFD's new Code of Professional Standards (COPS), launched in 2014, set out minimum standards relating to premises and services provided by members. It also provided a framework within which the Standards & Quality Managers (SQMs) could inspect 'back-of-house' areas of funeral homes for the first time. Members are now required to conform to the COPS in addition to our Code of Practice but, as many of the areas it covers relate to strict legal requirements (over which the NAFD has no jurisdiction), it has an advisory (rather than prescriptive) function, with a view to encouraging self-assessment and best practice.

At the same time as the launch of COPS, the existing Code of Practice was updated and the Code of Practice Committee and the Professional Standards Board were merged into a new Committee to be known as the Committee for Professional Standards to oversee compliance with both codes.

As the COPS is an advisory code, there can be no pass or fail - and a supportive approach is adopted to encourage and support best practice (although a serious breach would almost certainly constitute a breach of the Code of Practice, which would lead to a fail). NAFD Standards and Quality Managers use the code as a baseline tool to identify and raise any concerns – and then work with the member to put in a plan in place that will resolve the issue.

Between 2014-2018, NAFD management was content for SQMs to informally record the issues, discuss them with the member concerned, agree a course of action and follow up to check they had been resolved satisfactorily. The SQM has always had the opportunity to seek additional NAFD support wherever needed and this sometimes leads to the issuing of warning letters, which are then followed up to ensure the issue is resolved.

In recognition that a more formal and rigorous process for monitoring standards is now appropriate, the recording of Code of Professional Standards issues changed, in January 2019, to start moving towards a more centralised approach to monitoring and managing of these matters. Since January we have tracked all concerns raised by SQMs under the Code of Professional Standards. However, this data capture process is in the very early stages and we are yet to put in place the necessary checks to ensure concerns are being recorded consistently across our SQM team. This is something we hope to address before the start of next year.

Source: NAFD

SAIF Inspections

70. SAIF carried out 2,801 inspections between January 2015 and July 2019.⁴⁹ Table 2 shows the compliance factors on which firms are judged and the numbers failing for each reason.⁵⁰ The most common reasons relate to control of substances hazardous to health ('COSHH'; 17% of inspected premises), and complaints procedure (10%). 'Back of house' issues include those relating to procedures for donations, cremated remains, jewellery, and floral tributes (2-4% for each of these), and treatment of clinical waste (5% of inspected premises)
71. SAIF in Scotland refused four applications for membership in 2015-2017, on the grounds of: 'Working practices', 'Lack of refrigeration & illegal clinical waste collection', 'Suitability of the operating principals' and 'Company standards & knowledge not sufficient'. SAIF National also expelled three members in the same period, suspended one, and sent a warning letter to another, although we do not know the reasons.

⁴⁹ This is approximately 1.7 times the 1,690 branches of SAIF members as of March 2019, showing that SAIF inspect their member's branches roughly every 3 years (assuming there are a limited number of repeat inspections of the same branch). Source: CMA analysis of SAIF data.

⁵⁰ More detail on SAIF's inspections are described in its [Quality Assurance Programme, A guide for members, SAIF](#)

Table 2: Sources of non-compliance in SAIF inspections Jan 2015 to July 2019

<i>Non compliance area</i>	<i>Number non- compliant</i>	<i>% of branches inspected</i>
Premises / Aesthetics	10	0.4%
Procedure for Donations	82	3%
Procedure for Cremated Remains	46	2%
Cremated Remains - individual listing	108	4%
Procedure for jewellery	86	3%
Procedure for floral tributes	62	2%
Written estimate with signature	21	0.7%
Itemised account	20	1%
Written confirmation with T&C's	105	4%
Confirmation to officiant	104	4%
CoP on display	164	6%
CoP to take away	142	5%
Price List to take away	49	2%
Complaints procedure	273	10%
Ownership displayed	230	8%
Letter head with correct ownership details	207	7%
SAIF logo displayed	92	3%
COSHH	490	17%
Clinical Waste	135	5%
At least one area of non-compliance	1,136	41%
No area of non-compliance	1,341	48%
Total number of inspections	2,801	100%

Source: SAIF

Annex 2

Training in the funeral industry

Qualifications and training

72. There are a number of relevant qualifications available to staff working in the funerals sector. The standard funeral industry-specific qualifications which are currently available are:
- (a) Diploma in Funeral Arranging and Administration (Dip FAA) from the NAFD, quality endorsed by Birmingham City University. The Diploma in Funeral Arranging and Administration is aimed at employees in the funeral sector with at least 6 months' experience. It is designed to equip funeral arrangers and administrators with the skills and knowledge required for their roles and can be completed within 9-12 months.
 - (b) Diploma in Funeral Directing (Dip FD) from the NAFD, quality endorsed by Birmingham City University. The Diploma in Funeral Directing is targeted at funeral directors who have already completed the Diploma in Funeral Arranging and Administration. It is benchmarked to Level 3 national standards in learning and assessment and can be completed within a minimum period of 12-15 months. All candidates must conduct a funeral within the period of study to successfully complete the Diploma. All applicants to the NAFD diplomas need to meet the entry criteria of working in the funeral industry for a minimum of 6 months prior to registering and for a minimum of 16 hours per week.
 - (c) Certificate in Funeral Arranging and Administration from the London Association of Funeral Directors (LAFD)
 - (d) Certificate in Funeral Service (Cert FS) from the British Institute of Funeral Directors (BIFD);
 - (e) Diploma in Funeral Service (Dip FS) from the British Institute of Funeral Directors (BIFD). This course (and the lower certificate qualification) is accredited by Greenwich University, and taught by individual tutors registered with the BIFD who set their own teaching schedule and fees.
 - (f) Qualification in Embalming (MBIE) from the British Institute of Embalmers (BIE). This will normally take 2-3 years and will be taught by accredited tutors. All members of the BIE must have successfully passed their examinations at the end of the course.

73. Additionally, SAIF through the Independent Funeral Directors College (IFD College) offers One Awards qualifications (NVQ equivalent). SAIF members can attend courses at the IFD College at discounted rates. Dignity told us that ‘The IFD College is a virtual college that provides basic vocational training at a flexible pace. It considers its courses to be complementary to those offered by the NAFD as they are targeted at a wider range of employees in the funerals sector. The IFD College provides basic health and safety and skills training to all staff in the industry as well as more advanced programmes.’
74. Co-op Funeralcare also offers its staff two apprenticeships developed in partnership with Learndirect:
- (a) FNC Operations and Services Level 2⁵¹ Apprenticeship – offered to new Funeral Service Operatives, Funeral Arrangers and Funeral Directors; and
 - (b) FNC Operations and Services Level 3⁵² Apprenticeship – offered to Funeral Directors when they have completed the Level 2 Apprenticeship.
75. Finally, Dignity told us that ‘Dignity has worked in conjunction with the NAFD, Co-op and various independent funeral directors to set standards for funeral services apprenticeships. In February 2019 Dignity obtained formal approval from the Institute of Apprentices. It is now working to establish apprenticeships for funeral arrangers, funeral team members and funeral directors with a programme of external training and assessments. Dignity is also working with industry organisations to set industry-wide standards for embalmer and mortuary technician apprenticeships.’
76. There is no requirement to hold any of these qualifications to work as a funeral director or embalmer, or for membership of either of the trade associations. We do not have data on the proportion of the industry workforce that holds these qualifications, but:
- (a) NAFD told us that in the two and a half years to March 2019, 245 people qualified with a diploma in funeral arranging, and 69 people qualified with a diploma in funeral directing.⁵³
 - (b) Co-op told us: ‘although we do not limit our recruitment to those with qualifications, we do emphasise the importance of obtaining qualifications’. All those who are new to role will be offered the opportunity

⁵¹ Equivalent to five good GCSE passes (source [Unionlearn](#))

⁵² Equivalent to two A level passes (source [Unionlearn](#))

⁵³ NAFD told us that it does not hold data on the proportion of its members (or staff of its members) that hold the qualifications.

to enrol onto an apprenticeship within their first 12 weeks and, funeral directors that do not hold a Co-op or NAFD qualification [redacted]. Co-op stated that ‘over 90% of our funeral homes will have at least one person working there who is either currently working towards or has already achieved their Level 2 apprenticeship.’ In the last three years Co-op has spent around £[redacted] on colleagues gaining these qualifications.⁵⁴

- (c) Dignity does not require its staff to hold any of the qualifications detailed, and told us that [redacted]. However, Dignity offers funding to its employees to complete these qualifications. Dignity told us that as the majority of the training it undertakes is internal, Dignity is not able to provide an accurate figure of total training costs. However, Dignity spent approximately £[redacted] on external training in 2018.⁵⁵
- (d) Funeral Partners told us that it does not require its employees to hold any of these qualifications, [redacted]. Across its branches around [redacted] staff members hold one of these qualifications, and Funeral Partners sponsor employees who would like to gain NAFD qualifications.⁵⁶ Funeral Partners has spent around £[redacted] in the last three years for its staff to gain formal qualifications.⁵⁷

77. In relation to embalming, The Largest funeral directors appear to place particular emphasis on formal qualifications:

- (a) Dignity told us that ‘although not a statutory requirement, embalmers in quality funeral homes will generally have completed a training course approved by the British Institute of Embalmers (“BIE”). [...] Dignity recruits BIE qualified embalmers but also funds the training of employees who do not hold the qualification. In 2016 Dignity spent £[redacted] on BIE training; in 2017 it spent £[redacted]; and in 2018 it spent £[redacted]. All Dignity embalmers either have BIE qualifications or are working under the supervision of staff with BIE qualifications.’
- (b) Funeral Partners also said that ‘we prefer that any embalmers employed by Funeral Partners, or contracted as a third party supplier to Funeral Partners, have the BIE qualification or equivalent. If any embalmers do not hold that qualification, we conduct an internal practical assessment of their skills and quality of embalming. This is conducted by a BIE member

⁵⁴ This includes amounts funded through the Apprenticeship levy.

⁵⁵ Excluding ancillary costs such as room hire, accommodation and refreshments.

⁵⁶ Dip FAA from the NAFD - [redacted] staff; Dip FD from the NAFD - [redacted] staff; Cert FAA from the LAFD - [redacted] staff; Cert FS from the BIFD - [redacted] staff; Dip FS from the BIFD - [redacted] staff; MBIE from the BIE - [redacted] staff; SAIF qualification (various) - [redacted] staff; Co-op qualification (various) - [redacted] staff; Other (various) - [redacted] staff

⁵⁷ This includes amounts funded through the Apprenticeship levy.

embalmer.’ [X] members of Funeral Partners’ staff hold the MBIE qualification in embalming.

- (c) Co-op told us that ‘We do not offer internal embalming training, but we are currently funding two of our Care Excellence managers through the training required to become embalming tutors with the British Institute of Embalmers.’

78. In relation to other training, aside from formal qualifications, The Largest funeral directors have told us that they invest significant resources in training their staff to a high standard, as well as ongoing monitoring and support to drive up standards. We also heard that the trade associations aim to encourage quality through the dissemination of good practice. For example, the NAFD provides a Manual of Funeral Directing. As of October 2020, the NAFD Funeral Director Code requires any staff or subcontractors responsible for caring for deceased people are equipped with the skills and knowledge necessary to do this.⁵⁸ SAIF told us that as part of the membership requirements, members should ensure that they properly train their staff, and that training is addressed as part of the inspection. For new funeral director firms with 12 months’ trading, SAIF has created the Probationary membership category, where training is mandated. Also, full members in the inspection are encouraged to continue to train newer staff and provide CPD for existing trained staff. It also told us that the ‘NSAIF Executive are looking to include as part of the renewal process that members will need to evidence CPD, as well as a Principal Manager be qualified.’ SAIF itself runs a range of training programmes which are free of charge for members, and take the form of regular webinars and regional meetings supplemented by an annual Education Day.

Views on the need for more training

79. Some funeral directors believe that there should be more or better training in the industry. For example, one funeral director submitted that:

‘An important factor is the demise of Professional qualifications moving from being almost mandatory, delivering a high level of service and quality, alas from the 1990’s, this has dropped dramatically as the recognised qualifications became less and less relevant and ultimately without regulation, redundant.

The amount of unqualified persons, poorly trained or worse without any training at all, claiming, quite legally, to be Funeral

⁵⁸ [NAFD code of practice, O. \(6.1\).](#)

Directors, opening unchecked, has led to many of the stories, experiences and race to the bottom in the name of competition which sickens the vocationally driven businesses, who are inevitably tarred with the brush of the profit first, sales oriented firms. The lack of set minimum standards is the greatest shame in the sector, allowing the unscrupulous and downright dangerous loose on an unsuspecting and vulnerable public. This is where unchecked open competition has led us.’⁵⁹

80. While we have not received evidence that non-qualified personnel are carrying out embalming, Dignity submitted that training is particularly important in relation to this:

‘Dignity considers that at least in relation to embalming, quality of service is directly linked to whether the embalmers possess the necessary training. It is in the consumer interest to ensure that only well-trained and qualified embalmers are allowed to perform this complicated procedure that can have a significant impact on health and safety at the funeral home as a whole (the very nature of the procedure means there are disease and safety risks in case proper hygiene is not maintained).’

81. Some questions on training were included in an NAFD survey of its members, carried out as part of its engagement with the Scottish Government’s consideration of whether to introduce an inspection and licensing regime. This survey found that more than 65% of respondents (albeit in a potentially biased sample, in terms of those who chose to respond to the survey) agreed or strongly agreed with the following statements:⁶⁰

- (a) I think all funeral directors should have to prove their fitness to practice, on a reasonably regular basis, through a recognised Continuous Professional Development method (qualification, training or verified experience).
- (b) I would like to see all funeral directors individually licensed, subject to qualification and continuing professional development requirements.

⁵⁹ [Brodies response to the issues statement](#)

⁶⁰ ‘Shaping NAFD policy direction, for 2019 and beyond, in Scotland’ - Annex A to [‘Report to Scottish Ministers on the introduction of a regulatory model including progressive licensing scheme for Funeral Directors in Scotland’](#) (version available for download contains this annex).