



UK FUNERAL DIRECTOR CODE

Supplementary Practical Guide

National Association of Funeral Directors

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PRACTICAL SUPPLEMENTARY GUIDE UK FUNERAL DIRECTOR CODE AND MANDATORY ENHANCED REQUIREMENTS

Introduction

This Supplementary Practical Guide to the UK Funeral Director Code is one that has been developed to support members of the National Association of Funeral Directors (NAFD) in applying the UK Funeral Director Code and its Mandatory Enhanced Requirements with clarity, confidence, and consistency.

The Guide provides a comprehensive, practical interpretation of the Code setting out what each section means in practice, what Standards and Quality Managers (SQMs) will expect to see during inspection, and how members can evidence compliance through their policies, records, and day-to-day operations.

The UK Funeral Director Code is statutory in Scotland meaning that our Scottish members must comply with them by law. In England, Wales and Northern Ireland it is not statutory but remain as our core standards that NAFD expect its members to follow as best practice. However, we recognise best practice does not mean a one size fits all approach and that demonstrating that your policies, processes and behaviours deliver the same level of safety, transparency and dignity that the statutory standard is designed to achieve.

This Guide also turns the Code's principles into clear, achievable actions, ensuring that every NAFD member can demonstrate professionalism, transparency, and compassion in all aspects of their work.

To make implementation easier, this edition of the Guide includes a range of useful template documents, including sample policies, forms, and procedures that can be adopted or adapted to suit your business. These templates reflect best practice in key operational areas such as client engagement, care of the deceased, staff training, record-keeping, complaints handling, and business continuity planning. Together, they form a practical toolkit to help members evidence compliance and maintain the highest professional standards.

The UK Funeral Director Code, its Mandatory Enhanced Requirements, and this Supplementary Practical Guide are all part of NAFD's commitment to promoting public trust in the profession, ensuring the dignity and respectful treatment of every deceased person, and protecting the interests of bereaved families. By following these standards, members demonstrate integrity, accountability, and leadership within a sector that plays a unique and vital role in society.

All NAFD members will have full access to:

- The UK Funeral Director Code in full
- This Practical Supplementary Guide

- The suite of downloadable templates and sample policy documents
- Frequently Asked Questions

Keep in touch through ukfuneralcode@nafd.org.uk and let us know what other ways we can support you. For example, there might be a template you would find useful that's not already included or you have a question that's not already included the FAQ section. Whatever it is, the document is a living guide and we will add as appropriate, always advising you when something new has been included.

These resources will be made available exclusively through NAFD Inspire, providing members with a central, easily accessible platform for compliance support, training, and professional development. Inspire will also host further learning modules and updates to ensure that members remain aligned with the latest regulatory expectations and industry best practice. By using this Guide alongside the Code, members can ensure that their practices not only meet but exceed required standards, fostering a culture of continuous improvement, transparency, and excellence across the membership.

Understanding the Guide

This guide provides an overview of the UK Funeral Director Code and the NAFD Mandatory Enhanced Requirements, in clear terms for NAFD Members. We have broken each section of the Code into three parts:

1. At a Glance – a summary to each Part¹ 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 Clauses² to the Code.
3. During Inspection – an overview of what the SQMs may look for during premises inspections.

The guide follows the order of the Code and Mandatory Enhanced Requirements, using practical language and examples for ease of reference.

Part 1 - Accountability and Compliance

At a Glance

In simple terms, the Code is not a substitute for the law. You are expected to know and follow the laws on health and safety, handling human remains, data protection, employment, etc. This clause reminds you that meeting legal obligations is the foundation of your business.

During Inspection

The SQMs will check that you understand your legal duties and have measures in place to follow them. How they will do that – they may:

¹ Part refers to each section of the UK Funeral Director Code

² Clause refers to individual requirements within a Part of the UK Funeral Director Code

- ask about how you keep up with legislation (for example, adherence to Health and Safety Executive guidance, data protection rules, etc.).
- review training records or policies to ensure you operate within the law.

Essentially, they will want to see that you treat the Code as an addition to – not a replacement for – statutory requirements.

Part 2 - Engagement of the Funeral Director and Transfer of the Deceased

This section covers your first contact with the client and bringing the deceased into your care. Transparency and clear communication are key.

Clause 2.1 - At a Glance

Funeral directors must be clear and honest about what they can and cannot provide. If a service isn't available, they should explain this and, where possible, suggest other providers. All communication should be in simple, jargon-free language, and families' instructions should be followed wherever reasonably possible, while always complying with the Code.

In Practice

- Be clear about what you can and can't do e.g., if you don't offer a certain type of coffin, say so up front instead of giving the impression that you can.
- Point people in the right direction – if you can't provide something, it's good practice to tell them where they might find it (e.g., "We don't provide horse-drawn hearses ourselves, but there are specialist companies who do, and we can give you their details.").
- Use plain English – avoid jargon or technical terms that families may not understand. For example, instead of saying "hygienic treatment of the deceased," explain simply "we can provide embalming if you wish, which means...".
- Follow the family's wishes where possible. If a client requests something within your ability, you should try to meet it. If there's a reason you can't (legal, safety, or Code compliance), explain that reason clearly.

During Inspection

The SQMs will expect to see evidence of transparent communication with clients. For example, they may:

- review your price lists, brochures, or arrangement/form document.
- check that staff know how to explain to families any products or services that cannot be offered and how to direct them elsewhere.
- ask staff to explain services to gauge if they avoid jargon and give clear information.

Clause 2.2 and 2.1. Mandatory Enhanced At a Glance

Self explanatory

In Practice

- Gather the basics straight away – note down who is contacting you (their name, address, phone number).

- Record details of the deceased – full name, address, date of birth/age (if known), and where they are currently located (e.g., hospital, care home, private address).
- Check that the death has been confirmed – make sure a trained healthcare professional has verified or pronounced life extinct (PLE).
- Identify the client – if the person contacting you is not the person arranging the funeral, make sure you also record the actual client's details once they are known.

During Inspection

SQMs may ask to see:

- Your first call template.
- An example of a completed first call record to check that each record contains the required information as outlined in the UK Funeral Director Code.

Clause 2.3 and 2.2. Mandatory Enhanced at a Glance

When a funeral director is first asked to transfer a deceased person into their care, it is important to confirm who the client is and to establish their authority as soon as possible. The client must be informed that the business adheres to the Code, and a copy or link should be provided on request. Once instructed, the deceased should be taken into the funeral director's care at the earliest reasonable opportunity.

Before carrying out a transfer, the funeral director must ensure that suitable equipment and a properly equipped vehicle are used, that staff involved are trained, and that everything is clean, well maintained and fit for purpose. Throughout the process, the deceased must always be treated with dignity and care, and sensitivity shown to any bereaved people who are present.

At the place where the deceased is collected, the funeral director must confirm the deceased's identity and obtain signed authorisation from the client or their representative to transfer the deceased person into their care. If the client has not yet been identified, authorisation should be obtained from the person requesting the transfer, such as hospital or care home staff. That person must also be given written confirmation of the location to which the deceased is being transferred, and the client must be informed of all premises where the deceased will be kept as soon as possible.

A careful record must be made of any personal effects taken into the funeral director's care, and of those returned to others, with the record signed by the client, their representative or, if necessary, by responsible staff at the place of collection. In addition, an identity tag must be securely attached to the deceased, and at least three unique identifiers recorded (such as name, date of birth, date of death, or collection address).

In Practice

Confirm who the client is – if the first call came from someone else (e.g., nursing home staff), find out quickly who the actual client is (the person with authority to give instructions) and make contact with them as soon as possible.

Where the call to transfer is made by a care home or hospital out of hours, consent may already be recorded within their documentation and we always recommend that verification of death must be confirmed by a suitably qualified professional before transfer.

Be transparent from the start – let the client know you follow the UK Funeral Director Code and provide them with a copy or web link which can be included on any documentation you leave with them.

Act promptly once instructed – collect the deceased at the earliest possible opportunity after receiving instruction to do so.

Before the transfer:

- Make sure equipment (stretchers, trolleys, etc.) is appropriate for the person's body type, clean, safe, and well maintained.
- Use trained staff for the transfer.
- Ensure the vehicle is specifically designed for transporting the deceased, clean, and well maintained.
- Treat the deceased with dignity and respect at all times.
- Be sensitive to family or others who may be present.

At the place of collection:

- Confirm the deceased's identity.
- Get signed authorisation for the transfer:
 - From the client (or their representative), or
 - From staff (hospital/care home) if the client isn't yet identified.
- Give written confirmation (letter/email) of where the deceased is being taken, with full address and contact details.
- Tell the client, as soon as possible, where the deceased will be cared for (all premises addresses).
- Record personal effects taken into your care and what was left behind or returned. Have this signed by:
 - The client or their representative, or
 - If they aren't available, another responsible person (e.g., hospital or care home staff).
 - If a member of the hospital or care home is unwilling to countersign, please record this fact together with their name and position.
- Record at least three unique identifiers for the deceased (e.g., full name, date of birth, date of death, address, or your case reference number).
- Make sure the identifiers are recorded and physically attached (e.g., wristlet).

Identification:

- Confirm your contractual client has the authority and has consented for you to act.

During Inspection

SQMs may ask to see:

Records & Documentation

- Written confirmation (paper or email) provided to the person authorising transfer, showing the location and contact details of where the deceased is taken.
- Personal effects log signed by the client or representative at the point of transferring the deceased into our care.

Policies & Procedures

- Written procedures covering:
 - How a client's identity and authority to instruct are verified.
 - How transfers are carried out with dignity and consideration for the bereaved.
- That all identity checks recorded at least three unique identifiers logged (e.g., full name, date of birth, date of death, transfer address, reference number)
 - Identity tags securely attached to the deceased, cross-checked with transfer records.
 - How staff are expected to handle and record personal effects.

Training & Competence

- Staff training records confirming competence in safe, dignified transfer of the deceased.
- Evidence of refresher training on use of equipment and vehicles.
- Facilities & Equipment
 - Records of vehicle servicing/cleaning schedules showing vehicles are maintained.
 - Evidence of equipment inspections/cleaning logs to show stretchers, trolleys, and lifting devices are fit for purpose and maintained.

Client Communication

- Records that clients were provided with a copy or link to the UK Funeral Director Code (if requested).
- Notes of initial contact showing efforts to establish and confirm who the contractual client is.

Part 3 - Care of the Deceased and Premises used by the Funeral Director

At a Glance

This section of the Code sets out clear expectations for how funeral directors must care for the deceased, ensuring dignity, safety and transparency at every stage. Funeral directors are required to follow official Health and Safety Executive guidance to manage infection risks and handle the deceased safely. They must be able to explain their care services clearly and sensitively to clients, without pressure or jargon, and keep a record of these conversations. Clients must also be informed of where the deceased will be cared for, and if any part of the care is carried out by a third party, written agreements must be in place and regularly reviewed.

Care facilities such as mortuaries must be secure, private, clean and well maintained, with suitable equipment to accommodate all body types. Funeral directors must carry out regular checks on those in their care and record every action taken, storing these records securely for at least five years. All staff involved in care must be properly trained and assessed, with their competence documented, and the dignity of the deceased must always be maintained through the use of appropriate clothing and coverings.

Specific practices such as first offices, embalming and refrigeration are also addressed. First offices – the process of preparing the deceased for viewing – should normally take place unless the client has specifically requested otherwise and must be carried out in a respectful way. Embalming is not required, but if offered, clients must be given clear information and provide written consent before it takes place, with only trained staff permitted to carry it out. Where emergency invasive procedures are necessary to preserve the deceased, funeral directors must try to contact the client beforehand, ensure the procedure is carried out by qualified staff, and keep a full written record.

Refrigeration is recognised as critical to dignified care, and funeral directors must have access to suitable facilities that are secure, clean and maintained at the correct temperature (4–7°C). Capacity must be sufficient and reviewed annually, with each deceased person stored individually. Viewing of the deceased should be explained clearly to clients, with facilities kept private, clean and fit for purpose. The deceased's identity must always be confirmed before viewing, and the client's wishes respected. Where viewing is not advised, the reasons must be explained sensitively and recorded.

Finally, funeral directors must ensure that their premises and vehicles are always clean and appropriate for funeral services, and that robust systems are in place to identify every deceased person, store personal effects securely, and maintain accurate records of all actions and advice given. Care areas must be treated with respect, which means no unauthorised use of phones or cameras, and incident reporting procedures must be in place. All refrigeration equipment must be subject to routine temperature checks, with results documented.

Overall, this section emphasises that funeral directors are expected to combine professionalism, transparency and compassion with rigorous standards of safety, record-keeping and dignity in the care of every deceased person entrusted to them.

In Practice

- Follow infection control guidance – Be familiar with HSE rules on handling the deceased. Staff must work safely to protect themselves and others from infection.
- Explain your services clearly. When meeting with families, describe (sensitively, in plain English) how you will care for the deceased. Keep a written note that you have done this.
- Never pressure clients. Families should be supported, not pushed. All advice should be given calmly, in a way they can easily understand, bearing in mind their grief.
- Tell families where their loved one is. Always inform clients where the deceased will be kept, and if they are moved, explain why and where to.
- Third-party care providers. If another business helps with care (e.g., embalming or refrigeration), you must:
 - Have a written Service Level Agreement (SLA), reviewed annually.
 - Tell the client which parts of care are provided by the third party.

- Care facilities must be fit for purpose – Mortuaries/care rooms must be:
 - Lockable and secure and accessible only by authorised personnel.
 - Clean, well-maintained, and inspected regularly.
 - Equipped to handle all body types.
- Checks on the deceased. Carry out regular checks on condition, plus one final check before closing the coffin or holding the funeral.
- Keep detailed records. For every deceased person, log what care was given, when, where, and by whom. Records must be secure, accessible, kept for at least 5 years, and compliant with data protection law.
- Staff training. Assess staff who care for the deceased. Keep records of training and competency.
- Maintain dignity. Always use appropriate covers or shrouds or clothing to ensure respect.
- First offices (initial care of the deceased):
 - Normally carried out unless the client instructs otherwise.
- Include cleaning, washing, dressing, closing eyes and mouth, arranging hands.
- Record reasons if not carried out.

Embalming:

- Not legally required or mandatory for funeral directors to offer.
- Must be explained clearly, with written client consent obtained if chosen.
- Only trained, qualified staff should carry out embalming.
- While the Code primarily applies to funeral directors' own premises, client choice remains paramount, even though embalming in a private home would be extremely rare. If a family requests this:
 - Explain that the premises must be inspected to ensure the room is fit for purpose, safe, and hygienic.
 - Obtain full written consent from both the client and the homeowner (if different).
 - Conduct and record a thorough pre-procedure inspection of the space to confirm it meets the necessary standards for safe and compliant embalming.
 - Proceed only if all safety, hygiene, and Code requirements can then be met.

Emergency invasive procedures:

- Examples include aspiration for tissue gas or gastric swelling. Pacemaker removal is not considered an emergency invasive procedure but a standard care requirement where cremation is planned.
- Try to get client's consent first; if not possible, record why and inform them as soon as possible.

- Must only be done by trained staff.

Refrigeration:

- Must have access to clean, secure refrigeration (on-site or via SLA).
- Units must run at 4–7°C, be lockable, and hold each deceased separately.
- Capacity must be reviewed at least once a year.
- Keep temperature monitoring records.

Viewing the deceased:

- Tell clients if viewing is included.
- If not standard (e.g., direct cremation), make this clear early.
- Try to facilitate viewing if requested, even if via another funeral director (any extra costs must be explained).
- Viewing rooms must be private, clean, well-maintained.
- Always confirm identity of the deceased before viewing.
- Respect client wishes about presentation (make-up, coffin open/closed, who may attend).
- Staff should be nearby during viewings to support the family.
- If viewing isn't advised or must be restricted, explain sensitively and record the advice.

Security and identification:

- Mortuary access strictly controlled, with out-of-hours log kept.
- Each deceased must be identified by at least three unique identifiers (e.g., name, date of birth, date of death, address or reference number).
- Identification should be affixed (e.g., wristband).
- Systems should allow inspectors to identify the deceased without staff help.
- Personal effects must be logged and securely stored.
- Records to be kept (secure, authorised access only).
- Funerals provided (services, estimates, invoices).
- Advice to clients about viewing and the outcome.
- Appropriate handling and management of ashes.

Care practices:

- No personal phones or cameras allowed in care areas unless authorised and logged.
- Only trained and competent staff may handle the deceased.
- Have an incident reporting and escalation system in place.

During Inspection

The SQMs may look for:

- Knowledge of HSE Guidance (3.1):
 - Training records showing staff have been briefed on Managing Infection Risks when Handling the Deceased.
 - Copies of the HSE guidance held on-site and included in staff induction manuals.
- Explaining services and recording it (3.2–3.4):
 - Copies of client records showing services explained and confirmation of location(s) where the deceased will be cared for.
- Use of third parties (3.5–3.6):
 - Written Service Level Agreements (SLAs) with any third-party providers (e.g. refrigeration, embalming etc).
 - Evidence of annual SLA reviews.
 - Records confirming clients were told which aspects of care were provided externally.
- Care facilities (3.7):
 - Inspection of mortuary facilities (lockable doors, cleanliness, equipment maintenance logs).
 - Cleaning schedules and maintenance records.
 - Evidence of suitable equipment for different body types (stretchers, lifts, fridges).
- Visual checks of the deceased (3.8):
 - Care logs showing dates, times, and outcomes of visual checks, including before coffin closure.
- Comprehensive deceased records (3.9):
 - Secure record system (manual or digital) logging:
 - Arrival/departure times.
 - Care actions (washing, dressing, embalming, first offices etc.).
 - By whom and when.
 - Data protection measures (secure storage, limited access, retention policy for 5 years).
- Staff assessments & training (3.10):
 - Training records and competency assessments for all staff involved in care.
 - Records of refresher training and outcomes.
- Dignity of the deceased (3.10.2):
 - Policy documents on use of shrouds/clothing/modesty covers.
 - Evidence from observation and care logs.

- First offices (3.11):
 - Client records noting discussions about first offices.
 - Logs showing when and how first offices were performed.
 - Written reasons kept if not carried out.
- Embalming (3.12):
 - Written client consent forms for embalming.
 - Training/qualification certificates for embalmers (if appropriate).
 - Health & safety risk assessments for embalming practice.
- Emergency invasive procedures (3.13):
 - Written records of any such procedures, reasons why, and attempts to contact client.
 - Training/qualification evidence for staff carrying them out.
- Refrigeration (3.14):
 - Temperature monitoring logs (showing 4–7°C range).
 - Evidence of annual capacity review.
 - SLAs with external providers if refrigeration is outsourced.
 - Secure access logs for refrigeration units.
- Viewing of the deceased (3.15–3.21):
 - Policies explaining whether viewings are included.
 - Records of advice given to clients about viewing (or not).
 - Logs of any viewings facilitated, including client requests (e.g. make-up, coffin open/closed).
 - Facility inspection to check privacy, cleanliness, and suitability.
- General facilities and records (3.1–3.11):
 - Cleanliness and maintenance logs for premises and vehicles.
 - Security logs for mortuary access (including out-of-hours entries).
 - Records of identification measures used (wristlets, tags, reference numbers).
 - Records of personal effects securely stored and returned.

Part 4 - Planning the Funeral Service according to the Wishes of the Deceased and the Bereaved

At a Glance

When planning a funeral, arrangements should always reflect the wishes of the deceased and their family. Funeral directors and their staff must be knowledgeable enough to explain clearly the services they provide, as well as how the deceased will be cared for. This includes being able to describe, both verbally and in writing, the different options available for burial and

cremation if the family asks. Clients should always receive clear, comprehensive information about the services on offer and what each involves.

Families must also be given enough detail to make informed choices. This means funeral directors must follow the requirements of the CMA Funerals Market Investigation Order 2021 and any other legal obligations. Once the family has made their decisions, the arrangements should be confirmed in writing or electronically. An itemised estimate, including third-party costs where known, must be provided, followed later by a final account that matches the estimate so far as possible.

If anything changes between the estimate and the final bill, these changes must be explained clearly to the client in advance, agreed with them, and recorded. The funeral director should be able to demonstrate, through an audit trail, why the changes were made.

In Practice

- You and your staff must know your services well enough to explain them clearly to families, not just verbally, but also in writing.
- You should be able to describe exactly how you will care for the deceased (e.g. refrigeration, preparation, viewing facilities).
- If asked, you must be able to explain the range of burial and cremation options, including location and availability.
- Clients should always receive clear, straightforward explanations of what you offer, without jargon.
- You must follow the CMA Order 2021 and any other relevant laws when providing information about prices and services.
- Once the family has chosen their preferred arrangements, you should:
 - Give them written or electronic confirmation of what has been agreed.
 - Provide a detailed, itemised estimate of charges, including third-party costs (disbursements) where known.
 - Provide a final invoice that matches the original estimate, so the client can easily compare.
- If costs or services change after the original estimate, you must tell the client beforehand and get their agreement.
- Any changes should be clearly described and justified.
- Keep an audit trail (notes, emails, signed confirmations) so you can show exactly why and when changes were made.

During Inspection

The SQMs may look for:

- Evidence of staff training in explaining goods, services, and care of the deceased.
- Written materials (brochures, website) describing services clearly.
- Records confirming who acted as client and what authority they held.
- Written or electronic estimates and confirmations, including itemised breakdowns.
- Final accounts that match the estimate, with clear justification for any differences.

- Compliance with CMA Order 2021 requirements.
- Audit trail documenting changes between estimate and final bill.
- Written evidence that clients were notified of, and agreed to, changes.
- Comparison of estimates to final accounts to confirm transparency.

Part 5 – Delivery of the Funeral

At a Glance

The funeral director is responsible for ensuring that the funeral is delivered smoothly, respectfully, and in line with the wishes of the client. This involves making bookings for venues, officiants, or catering when asked, and ensuring all necessary legal paperwork is completed and submitted on time. Accurate records must be kept, including any changes to instructions, so that the client's wishes are properly documented. The deceased should always be presented with dignity, according to the family's instructions.

Funeral directors must also manage donations in a transparent and secure way. This includes having a clear, written policy that staff understand and that clients can access if they wish. Records must be kept of all funerals, services provided, costs, advice about viewing the deceased, and how ashes are handled.

Special care must be taken with ashes. Funeral directors must have a written ashes management policy that sets out exactly how ashes are stored, recorded, transferred, and returned or scattered. Ashes should always be stored securely, together with the cremation certificate, in a clean, dry, and locked location. Each set of ashes must be kept separate, properly labelled, and an audit trail kept of all actions taken. Clients must be clearly informed of their options (such as interment, scattering, or keeping ashes in an urn), and changes to instructions must be allowed for.

More broadly, funeral directors are expected to treat every client with fairness, dignity, and respect, recognising that many families are vulnerable. They must only accept instructions for which they have the skills, staff, and resources to carry out, and services must be delivered competently and on time. Clients should always receive full, clear, and up-to-date information about pricing (both in the funeral home and online) including third-party costs. Clients also need to be reminded that they are personally responsible for having the legal right to arrange the funeral and to make payment of the funeral account.

Funeral directors should take reasonable steps to avoid being caught up in family disputes and ensure that pricing information is kept current. Finally, ashes must never be withheld as a way of securing payment, and any loss or damage of ashes must be reported promptly to management, the client, and, if relevant, trade bodies or regulators.

In Practice

- Manage the whole funeral professionally. Make all necessary bookings (service location, officiant, catering etc) when the client asks you to.
- Ensure statutory paperwork is done correctly and check that all required forms are completed and sent to the right authorities on time.
- Keep accurate records. Log every service requested, estimates, invoices, and any changes to the client's instructions.

- Present the deceased appropriately ensuring the person is cared for and presented in line with the client's wishes (where possible and safe).
- Handle donations properly and follow a clear written policy (known by staff, available to clients) so money is managed securely, transparently, and as the family requests.

Record Keeping:

- Records of all funerals, including requested services, estimates, and invoices.
- Notes on advice given to families about viewing the deceased, and the outcome.
- Detailed records on the management and handling of ashes.

Ashes Management:

- Have a written ashes management policy, covering:
 - Secure, clean, and designated storage of ashes with the cremation certificate.
 - Procedures for recording each set of ashes and preventing mix-ups.
 - Handling of splitting ashes, transfers, or release of ashes (including client ID checks).
 - Keeping an audit trail of all actions.
 - Recording scattering or interment of ashes (if you carry it out).
- Clearly explain the family's options (scattering, interment, urn retention).
- Respect changes in client instructions about ashes.
- Never combine ashes from different people unless specifically requested by the client /family following, say, a husband and wife funeral or ashes have been retained at the request of the client for them to be mingled following a subsequent death.
- Report lost or damaged ashes immediately to management, the client, your trade body, and any regulator.
- Never withhold ashes to secure payment.

Client Care and Information:

- Treat all clients fairly, respectfully, sensitively and remembering some may be vulnerable.
- Only accept instructions you have the resources and skills to carry out.
- Provide a competent, timely service tailored to each family's needs.
- Give clear, full pricing information (in the funeral home and online) including third-party costs.
- Make sure clients understand the overall cost as the arrangements progress.
- Remind clients they are personally responsible for being legally entitled to make funeral arrangements and make payment of the funeral account.
- Avoid getting caught up in family disputes.

- Keep your pricing information complete and up to date.

During Inspection

The SQMs may look for:

- Bookings & statutory forms (5.1.1–5.1.2)
 - Records of bookings made (venues, officiants, catering, transport).
 - Copies of statutory forms (cremation/burial forms, the Registrar’s Certificate for Burial or Cremation (Green etc.) showing they were completed and submitted on time.
 - A system or log showing forms are tracked and deadlines met.
- Records & documentation (5.1.3)
 - Client files with detailed notes of instructions given and any changes.
 - Signed confirmation of changes (e.g., amended estimates or updated emails).
 - Audit trail showing version control (a system for tracking changes to documents over time) or updates.
- Presentation of the deceased (5.1.4)
 - Written procedures for preparing and presenting the deceased.
 - Checklists signed off by staff for each case.
 - Records of specific family wishes (e.g., clothing, personal items, viewing requests).
- Donations management (5.1.5–5.1.6)
 - A written donations policy accessible to staff and clients.
 - Donation handling logs (showing amounts received, stored, passed on).
 - Evidence that donations are kept securely (e.g., safe or locked cashbox).
 - Staff training records confirming awareness of the policy.
- Funeral records (5.2.1–5.2.3)
 - A register or database of all funerals provided.
 - Copies of estimates and final invoices for each funeral.
 - Records of advice given on viewing (with notes of client decision).
 - Documentation on ashes management for each case.
- Ashes management policy (5.3)
 - A written ashes management policy covering:
 - Secure storage (designated, locked, clean, dry location).
 - Recording each set of ashes and keeping with cremation certificate.
 - Procedures for splitting, transferring, or releasing ashes.

- Client ID checks before ashes release.
 - Audit trails for all ashes-related actions.
 - Reporting lost/damaged ashes.
- Ashes log book or digital register.
- Evidence of staff following the policy (sign-off sheets, training records).
- Fair treatment & transparency (5.1–5.11)
 - Policies showing respect and dignity for clients, especially the vulnerable.
 - Staff training records on communication, equality, and dealing with vulnerable people.
 - Transparent pricing information displayed in the funeral home and online.
 - Copies of estimates and invoices showing clear breakdown of third-party costs.
 - Leaflets or client information packs given at arrangement meetings.
 - Records showing clients were advised of their legal responsibilities to arrange the funeral (business terms and conditions).
 - Evidence of steps taken to avoid involvement in family disputes (e.g., notes in case files, correspondence).
 - Confirmation pricing information is up to date and publicly available.
 - Logs showing ashes are stored securely and never withheld for payment.

Part 6 – Complaints

At a Glance

Every funeral director must have a written complaints procedure that is easy for clients to access, either online or on request. When a complaint is made, the procedure must be followed, setting out clearly how to complain, how the matter will be handled, and when the client can expect a response. All outcomes must be provided in writing. Clients can complain directly to the funeral director, who must make a genuine effort to resolve the issue, or through the NAFD (or SAIF if a joint member). If the issue cannot be resolved locally, details of an independent dispute resolution body must be given and used if necessary. Complaints must always be dealt with fairly, openly and promptly, and funeral directors must be transparent about serious mistakes or incidents. They must also have a formal process for handling discrimination complaints.

In Practice

- Have a written complaints procedure that sets out how clients can complain and how you handle complaints.
- If you have a website, it must be published there.
- If not, you must be able to give it to clients quickly (electronically or on paper) if they ask.
- Your complaints procedure must cover:
 - How a client can make a formal complaint.
 - How you will respond (steps, who handles it, and timelines).
 - That any final outcome/response is always given in writing.
- How to deal with complaints in practice:
 - Try to resolve issues directly with the client quickly and fairly.
 - Advise your client that as a member of the NAFD they are able to escalate complaints to us.

- If unresolved, you must give clients details of NAFD Resolve (the Alternative Dispute Resolution (ADR) service available as a benefit of membership)³
- Standards for handling complaints:
 - Treat all complaints promptly, fairly, openly, and effectively.
 - Be transparent with clients if serious mistakes or incidents occur.
 - Have a documented way to deal with complaints about discrimination.

During Inspection

The SQMs may look for:

- A copy of the written complaints policy.
- Evidence of where it is published (e.g., on the company website, in brochures, or client information packs).
- How you keep printed or electronic copies available for clients on request.
- How clients are informed about how to make a complaint (e.g., a leaflet, website section, or contract wording).
- Internal procedure documents that set out how complaints are logged, investigated, and resolved, including clear timescales.
- Examples of template response letters or emails to show that written replies are standard practice.
- Your complaints log (with anonymised entries) to evidence genuine attempts to resolve complaints promptly and fairly.
- Correspondence showing escalation routes to your trade association, if applicable.
- What learning or corrective actions were taken following complaints.
- Evidence that ADR details are given to clients — for example, in contracts, on the website, or within complaint acknowledgment letters.
- How complaint outcomes were communicated openly and in writing.
- Records of how complaints were resolved (including timelines).
- Your documented process for handling discrimination complaints.
- Evidence of staff awareness/training on equality and diversity obligations.

Part 7 – Business Continuity and Managing Risks

At a Glance

Every funeral director should have a clear plan in place for dealing with unexpected situations. This means writing and keeping up to date a contingency plan that explains how the business would cope if there were a sudden rise in deaths, or if normal services were disrupted or unavailable. When preparing this plan, it is important to work with local crematoria, burial

³ If you are a joint member of both SAIF and NAFD, you will need to refer a complainant to one or the other but not both.

grounds, other funeral directors, and the NHS Board where possible, so that the arrangements are realistic and co-ordinated.

Beyond contingency planning, funeral directors should make sure their business is well managed and resilient. This includes having a clear governance structure with defined reporting lines, robust systems and controls to ensure compliance with the Code, and training so that staff are competent for their roles and responsibilities.

Professional indemnity insurance should be in place to protect the business, its employees, and its clients. Finally, funeral directors must actively identify, monitor, and manage risks and take action where issues are found to ensure they can continue to deliver services to a high standard and in line with the Code.

In Practice

- Have a written contingency plan that sets out:
 - How you will cope if there's a sudden rise in deaths (e.g., pandemic, local incident).
 - What you'll do if key services are disrupted (e.g., vehicles break down, mortuary facilities fail, staff shortages).
- Work with others when planning. Where possible, consult local crematoria, cemeteries, other funeral directors, and your NHS Board so your plan is realistic and joined up.
- Put proper governance in place. Make sure your business has clear reporting lines (everyone knows who is responsible for what).
- Use effective systems and controls including record-keeping, staff rotas, compliance checks, and policies that ensure you meet Code standards.
- Train your staff properly. All staff should have training appropriate to their role and responsibilities so they can perform competently and safely.
- Maintain insurance cover to ensure you have adequate professional indemnity insurance that protects the business, your staff, and your clients. As a member of the National Association of Funeral Directors, this is a benefit of your membership.
- Manage risks actively by regularly identifying and reviewing potential risks to your services and take action to address them (e.g., staff cover plans, equipment servicing, emergency suppliers).

During Inspection

The SQMs may look for:

- A written contingency plan (dated and reviewed regularly) that:
 - Sets out how the business will handle a sudden rise in deaths (e.g., additional vehicles, temporary staff, refrigeration capacity).
 - Covers how services will continue if disrupted (e.g., power cuts, vehicle breakdowns, staff illness, IT failures).
- Records or correspondence showing engagement with third parties (e.g., meeting notes with crematoria or burial grounds, mutual aid agreements with other funeral directors, contact with NHS Board).
- Evidence that the plan is reviewed and updated (e.g., version control, signatures, or annual review notes).

- An organisational chart or written description of reporting lines.
- Evidence of internal audits or compliance checks.
- Training records (staff induction, refresher training, CPD logs).
- Certificates from courses attended (health and safety, data protection, bereavement care, manual handling, etc.).
- A risk register (document listing key risks, likelihood, impact, and mitigation measures).
- Evidence of monitoring and updating the register (e.g., quarterly reviews).
- Records of action taken when issues were identified (e.g., incident reports, corrective actions).

Mandatory Enhanced Requirements

Part 8 – Publicity and Ethical Procurement of Business

At a Glance

Funeral directors must present themselves honestly and respectfully in all publicity. Any advertising or communication should be accurate, transparent, and never misleading, as public trust in the profession depends on integrity. When charges are advertised, they must be clearly explained, with it made obvious whether or not third-party costs (disbursements) are included.

Funeral directors must not actively seek business through unsolicited approaches (whether in person, by phone, or through third parties) such as selling funeral plans directly to members of the public. If a client has been referred by an introducer, the funeral director must always explain if that introducer has any financial or other interest in making the referral, so the client can make an informed choice. This clause does not preclude a mail drop (posting leaflets or brochures through letterboxes) is not an “approach in person” and not a direct personal contact, it’s classed as general marketing or advertising. UK direct marketing and data protection law (PECR and UK GDPR) only restrict targeted marketing using personal data (like named letters, emails, or phone calls). Mail drops that are untargeted (e.g. generic leaflets delivered door-to-door without using personal information) are fully lawful and compliant with both legislation and the Code’s intent.

In Practice

- Be honest in advertising. All brochures, websites, signage, and social media must give a truthful, clear picture of your services and prices. Don’t exaggerate or make claims that could damage trust in the profession.
- Show charges clearly. When mentioning prices, explain whether disbursements (third-party costs like crematorium or burial fees) are included or not, so families are not misled.

- No cold-calling or doorstep selling. You must not approach people directly, in person or by phone, to try to sell funeral services or funeral plans. Business should come from client choice, not pressure.
- Be transparent about referrals. If someone (like a care home) refers a client to you and they benefit financially (or otherwise) from doing so, the client must be told.

During Inspection

The SQMs may look for:

- Copies of adverts, brochures, and website content to show accuracy.
- Examples of published price lists (e.g., displayed in branch, online).
- Completed itemised estimates and invoices that clearly state whether disbursements are included.
- Written policy confirming the business does not cold-call, doorstep-sell, or use third-party agents in this way.
- Training records showing staff are instructed not to engage in unsolicited sales.
- Sample letters or client information sheets where introducer interests are disclosed.
- Contracts/agreements with introducers showing transparency.

Part 9 – Training and Professional Development

At a Glance

Funeral directors and their staff are expected to take responsibility for their own learning and keep a personal development record. Anyone working directly with bereaved families must have the right skills and knowledge to provide appropriate support. Likewise, anyone caring for the deceased must be properly trained and competent in their duties. Staff with responsibility for ensuring legal compliance or professional standards must also have the necessary knowledge to carry out these obligations.

In Practice

- Everyone keeps learning. You and your staff should maintain a personal development record (like a training log or CPD file) and update it regularly. You can do this through NAFD Inspire – a benefit of your membership.
- Ongoing responsibility. Each person is responsible for their own professional growth, not just the employer.
- Bereaved care skills. Anyone dealing directly with families must have the right interpersonal skills, empathy, and knowledge to support grieving clients appropriately.
- Deceased care skills. Anyone handling the deceased must have the correct technical training, competence, and respect for carrying out that role safely and professionally.
- Compliance knowledge. Anyone with responsibility for following the law (health & safety, data protection, CMA rules, this Code, etc.) must be trained and confident in those areas.

During Inspection

The SQMs may look for:

- Certificates of training or qualifications, e.g., health & safety, manual handling, bereavement care, infection control, care of the deceased, or compliance training. This might be through NAFD Inspire and/or the business's own internal learning management systems.
- Induction records for new staff, showing they were trained before undertaking duties.
- Attendance sheets or completion records for in-house training sessions, workshops, or external courses.
- Policies/procedures showing how ongoing training needs are identified and addressed.
- Role-specific training evidence, e.g.:
 - For staff supporting the bereaved → training in communication, grief awareness, cultural sensitivity.
 - For staff caring for the deceased → training in safe handling, hygiene, infection control.
 - For staff ensuring compliance → training in GDPR, health & safety law, and Code requirements.

Part 10 – Equality, Diversity and Inclusion

At a Glance

Funeral directors and their staff must treat everyone with fairness and respect. This means never discriminating against, harassing, or victimising anyone during professional dealings. Where clients, employees, or managers have a disability, reasonable adjustments should be made so they are not disadvantaged and importantly, the costs of these adjustments should not be passed on to them. If any complaints of discrimination arise, they must be handled quickly, fairly, openly, and effectively.

In Practice

- Treat everyone fairly. You and your staff must not treat clients, families, or colleagues differently because of protected characteristics such as age, race, religion, sex, disability, or sexual orientation.
- Do not harass or victimise anyone. Bullying, offensive behaviour, or unfair treatment must not occur in any dealings with clients, staff, or third parties.
- Support disabled people. Make reasonable adjustments so that disabled clients and staff can access services or carry out their work without unnecessary barriers, such as step-free access, large-print documents, or flexible working arrangements.
- Do not charge extra for adjustments. The cost of these adjustments must not be passed on to disabled clients, employees, or managers.
- Handle complaints properly. If someone raises a concern about discrimination, investigate it promptly, fairly, and openly, and take appropriate action.

During an Inspection

SQMs may look for:

- Written policies on equality, diversity and inclusion that are up to date and shared with staff.

- Training records showing staff have received EDI training (e.g. induction or refresher sessions).
- Examples of reasonable adjustments made for disabled clients or staff (such as accessible entry into the funeral home).
- A complaints procedure that includes discrimination issues, with records showing any complaints were logged and handled promptly, fairly and openly.

Part 11 - Confidentiality and Data Protection

At a Glance

Funeral directors must handle all personal information with care. This means complying fully with data protection laws and keeping the affairs of clients private unless the law requires disclosure or the client has given consent. The same duty of confidentiality extends to the deceased, and information about them must not be shared unless legally required or agreed by the client. Funeral directors should also have reliable systems and controls in place to identify any risks to confidentiality and take steps to reduce those risks.

In Practice

- You must follow the requirements of data protection law including the General Data Protection Regulation.
- Information about clients must always be kept private unless the client has given permission or the law requires you to share it.
- Information about the deceased must also be kept private unless the client has agreed or the law requires you to share it.
- You should have systems in place to spot any risks to confidentiality and processes to reduce those risks, such as secure storage of records and controlled access to information.

During Inspection

The SQMs may look for:

- A written data protection policy that shows compliance with UK GDPR requirements.
- Staff training records confirming that employees have received guidance on confidentiality and data protection.
- Examples of privacy notices given to clients explaining how their data is used and protected.
- Secure systems for storing client and deceased records, such as password-protected databases or locked filing cabinets.
- Evidence of consent forms or written permissions where client or deceased information has been shared.

Part 12 – Working with your Regulators

At a Glance

You must keep your regulators informed about any significant changes to your business, such as opening or closing a branch, or if another regulator takes action against you. This includes

both sector regulators such as the Financial Conduct Authority (FCA) and wider bodies like the International Standards Organisation (ISO) or the Health and Safety Executive (HSE). If there is a serious failure to comply with the Code, you must also notify them.

At all times you are expected to co-operate fully with your regulators. This means engaging openly with any investigations into your compliance with the Code and following any written notices from them or from independent organisations that oversee complaints.

Whilst the NAFD is not a regulator in the traditional sense, members are required to allow access to their premises during inspections (whether announced or unannounced) and to provide any information necessary for assessing compliance. When self-reporting is required, members must ensure that all information submitted is complete, accurate and provided promptly.

In Practice

- If there are important changes in your business, you must tell your regulator quickly. Examples include opening or closing a branch, or if another regulator such as ISO or the Health and Safety Executive takes action against you.
- If you fail in a serious way to follow the UK Funeral Director Code, this should also be reported.
- You must always co-operate with your regulator, including if they are investigating your compliance with the UK Funeral Director Code.
- If your regulator or an independent complaints body issues a written notice, you must follow it.
- You must allow regulators to carry out both planned and unplanned inspections and give them access to all areas of your premises that they need to see.
- You must meet any requirements to self-report and make sure that the information you provide is complete and accurate to the best of your knowledge.

During Inspection

The SQMs may look for:

- Records of notifications sent to regulators (incl. NAFD) about changes (for example, emails or letters confirming the opening or closure of premises).
- Their ease of access to the business.
- Policies or procedures outlining how the business maintains ongoing communication and co-operation with regulators.

Part 13 – Standard Operating Procedures

At a Glance

Members must keep clear written procedures and accurate records. This includes knowing which staff are authorised to handle the deceased, keeping logs for visitors and contractors, and ensuring security in mortuaries and chapels of rest. Embalming must be fully documented, and regular audits and risk assessments should show that strong safeguards are in place to protect the deceased.

In Practice

- Keep a register of authorised staff who can collect, transport, prepare the deceased, or help during viewings.
- Maintain records of all casual or temporary staff who assist with removals or transfers.
- Keep out of hours rotas up to date and record any staffing changes that affect removals and transfers.
- Have written lone working policies and procedures.
- Have a written whistleblowing policy and procedure for employees.
- Use a sign in and sign out log for all visitors, showing the purpose of each visit.
- Keep records of how contractors are supervised when they are on site.
- Have a system to identify and highlight deceased individuals with the same or similar names.
- Set clear rules for who may enter the mortuary or chapel of rest and under what circumstances.
- Ensure that all doors and access points to the chapel of rest are secure.
If the funeral home has a single chapel, access should be controlled through the main entrance, which can remain locked at all times to ensure the entire premises, including the chapel of rest, remains secure.
- Keep a register of all viewings that take place.
- Keep detailed records for every embalming procedure, including the date and, if a trade embalmer is used, their full details.
- Maintain documented evidence of regular internal audits and risk assessments. These must include proof of strong security measures to protect the deceased.

During an Inspection

The SQMs may look for:

- A register listing all authorised staff who collect, transport, or prepare the deceased, and those who assist with viewings.
- A written lone-working policy and procedure available for review.
- A written whistleblowing policy and procedure accessible to staff.
- A visitor log book or electronic record showing names, times, and purpose of visits.
- Records of contractor supervision protocols and completed supervision logs.
- A system (paper or digital) that flags cases where deceased individuals have identical or similar names.
- Written procedures stating who is permitted access to mortuary and chapels, under what circumstances.
- Evidence of secure entry points (e.g. key control system, door locks).
- A viewing register showing names, dates, and times of visitations.
- Embalming records for each procedure, including dates and details of the embalmer (with external trade embalmer details recorded if used).
- Written reports or files of internal audits.
- Documented risk assessments, including security measures for safeguarding the deceased.