

Deceased Management
Advisory Group

Pandemic
COVID-19

Interim Lessons Learned Paper





The pandemic has had a profound impact on the delivery of essential services across the UK, including those related to the management of the deceased. It was necessary to increase capacity as the number of excess deaths rose through the current emergency, whilst maintaining the care and dignity required of the sector.

The support of the UK government and devolved administrations has been essential, providing not only a regulatory framework to streamline funeral administration but also practical measures, such as PPE supplies through the LRF network. DMAG welcomes the initiatives taken by government and praises their willingness to work with the sector.

We are aware that there remain concerns both about a ‘second wave’ and localised ‘hot spots’ of the virus developing. With these concerns in mind DMAG has carried out an interim review of the response by the death management sector to the pandemic. The purpose of this review was not to arrive at a definitive position on the success or otherwise of the measures implemented, as clearly that will be for any inquiry which takes place later. It was to learn lessons from our collective experience and apply them so the sector will be better placed to react to any increase in deaths during the short to medium term.

On that basis a report was produced and circulated across the sector, including all those taking part in the regular Cabinet Office consultations. We should like to thank all those who contributed, including individuals, companies, and government representatives. The initial report has been updated and is attached with revised outcomes which the 7 sector trade organisations believe are essential to improving any future response to a renewed increase in deaths.

DMAG

Desired Outcomes

1. A recognition by central government and the devolved administrations that the Deceased Management sector successfully achieved all three of its objectives during the pandemic:

- Mortuary capacity was not overwhelmed
- an increased number of dignified funeral services were delivered
- an increased number of dignified cremations and burials were delivered.

These were achieved largely through extending existing services, based on extensive experience managing seasonal excess deaths and previous flu outbreaks.

2. The Deceased Management sector has unparalleled experience of coping with excess deaths. Central government and the devolved administrations use this resource in a proactive manner to advise, shape and develop policy and guidance. The sector should be provided with the opportunity to comment on draft policy and/or guidance, to ensure it accurately reflects the desires of government for the sector, that it is deliverable, and is sensitive to meeting the needs of the bereaved.
3. Building on the close working relationship central government and the devolved administrations have developed with DMAG, strengthen their single coordinating point of contact for all Deceased Management legislation, policy and guidance being produced across government.
4. Large scale emergencies invariably result in the involvement of a range of support organisations, each bringing their own skills and expertise to the situation. Whilst the support is welcomed, the Deceased Management sector had a clear understanding of the need and means for increasing capacity for disposing of the dead, and many of those adopting positions of the authority had not, resulting in confused messaging, creation of unwanted capacity, seeking and deploying Pandemic Multiagency Response Teams (PMART). A greater recognition of the expertise within the sector locally and improved coordination of LRFs in England and Wales by the lead government department, will ensure a more effective, proportionate, and consistent response to the demand for disposal.
5. Building on the close working relationship central government and the devolved administrations have developed with DMAG, recognise this grouping of sector representative bodies as a first point of contact.
6. In view of the success of the electronic/telephone registration and transmission of Disposal Certificates electronically, the General Register Office makes the current changes to the death registration process permanent.
7. In view of the success of video conferencing across the Deceased Management sector, funeral arranging, streaming services and meetings, its continuing and extended use is encouraged.
8. A UK-wide central cremation service availability portal is developed and its adoption encouraged.





Pandemic COVID-19 Interim Lessons Learned Paper

Introduction

It was known that the pandemic would result in an unprecedented increase in deaths.

The three key objectives for the sector at this time were:

- Ensuring mortuary capacity was not overwhelmed
- Delivering an increased number of dignified, limited funeral services.
- Delivering an increased number of dignified, limited cremations and burials.

To achieve the increase in capacity it was necessary to introduce a range of initiatives and radically alter operating procedures. These changes had varying results, and in view of a possible 'second wave' this interim paper considers learning which could be applied to enable the sector to deliver a more effective response.

Government

The government has responsibility to define the framework and culture of the response to the pandemic through legislative changes, sector engagement, communication and implementing the pandemic planning which the sector organisations had contributed to as recently as 2019. It was questioned why the 2007-2009 pandemic planning by the NAFD and SAIF with the Civil Contingencies Unit was not deployed.

Legislative changes and guidance

- Streamlining statutory cremation documentation and enabling registration of deaths via telephone, increased capacity and was widely welcomed across the sector
- Closing crematoria, apart from for funerals, enabled cremation authorities to focus on delivering cremation services



- Closing cemeteries was also welcomed for the same reasons, however, the original legislation in England was poorly drafted and caused confusion
- Guidance for managing funerals was welcomed throughout the sector. However, the variations between the UK and devolved administration's led to confusion and unnecessary complexity. As did the guidance on social distancing at funerals which varied between those elements held in places of worship and those taking part in cemetery and crematorium chapels.

Overall, the legislative changes were viewed as being extremely supportive to the sector in achieving its objectives. In particular, the General Register Office (GRO) who introduced fast tracked death registration and certification.

There were some reports of delays by the Coroners' offices, which added to storage capacity issues in funeral homes. Can the deployment of additional resources in any future event be explored with the Office of the Chief Coroner?

However, it was recognised that if government had shared their draft proposals with a representative group from the sector before finalising them, the legislation could have been more effective and not required amendment.

Engagement

- The primary channel for government to engage with the sector was through the Cabinet Office. The weekly meeting was extremely inclusive involving representatives of trade organisations, individual companies, government departments and devolved administrations. Whilst the meetings were informative, the large number attending (approximately 40) and being limited to an hour did not allow for any in depth discussion, exploration of topics or resolution of cross cutting issues.
- The introduction of the Deceased Management Advisory Group (DMAG) provided a sector wide point of contact for central and devolved governments. The dialogue which developed proved extremely useful for sharing information, exploring issues and inputting into the development of policy. The Group welcomed, and continues to do so, the regular interaction with the various government departments and devolved administrations at their regular meetings.
- Despite the channels available on occasion, especially at the start of the emergency, it was felt that government were not taking the opportunity to engage with the sector over specific initiatives, for example, the varied responses from LRFs in England and Wales, or to take the lead in co-ordinating their activities.
- Overall, the engagement through DMAG was extremely productive, enabling both government and the sector to explore issues, seek solutions and share a wide range of information. It is hoped this will continue going forward into the medium and longer term.
- In addition, DMAG proved to be an early warning system of the prevalence of the virus across the regions and notably occurrences of deaths in care homes 10 days prior to other streams of information being collected by the Government.

Communication

- The lack of communication over key information, for example death rate modelling, was felt to be a significant issue and remains a concern for preparedness in the sector for a second surge in COVID-19 deaths.



- The introduction of PMARTs without any prior discussion or communication was felt to have undermined local funeral directors. No information has been shared justifying why it was necessary to introduce this measure of ‘last resort’, especially as there is evidence that the PMARTs were inadequately trained and led to the delay of some funerals.
- The wide number of government departments issuing communications and advice relating to the Death Management sector was confusing.
- The delays in receiving guidance on crucial issues such as PPE usage and coming out of lockdown and a lack of consultation on the guidance, led to confusion and low levels of confidence among sector colleagues once the guidance was issued. This was further exacerbated by devolved administrations issuing guidance which sometimes differed on fundamental matters, such as the use of body bags.
- Excessive requests for information from LRFs led to survey fatigue and a reluctance from some in the sector to engage

The desire on the part of government to communicate was recognised and welcomed. However, it is believed that there should have been a central point in government clearing/issuing information as it was unclear when it would be issued and which department was dealing with what.

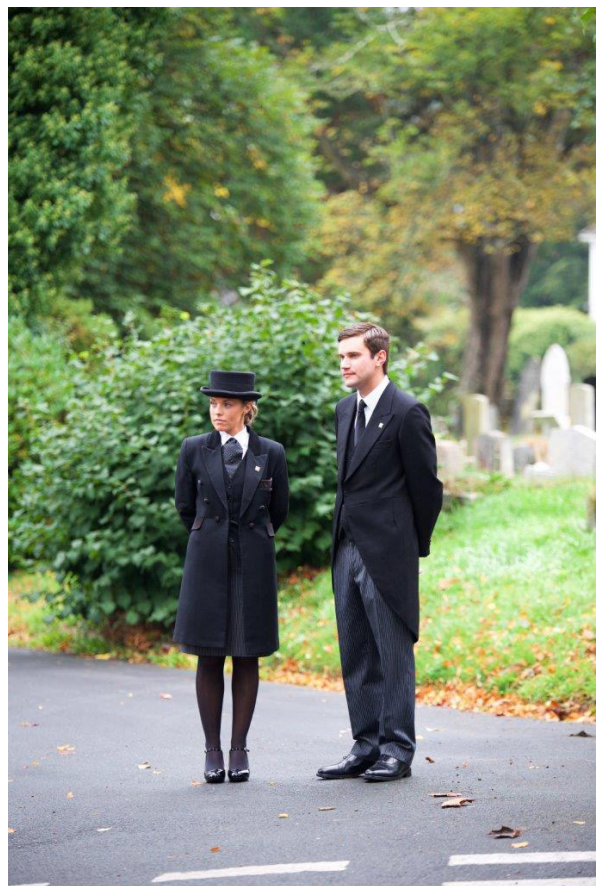
Furthermore, if the sector could have had an input into the development of communication, guidance, and advice, this would have benefited from experienced and expert input.

Sector

The funeral, as a process, is delivered through a partnership of two distinct providers, funeral directors and cemetery/crematoria operators. A significant increase in capacity can only be delivered through both groups of providers cooperating to deliver the agreed outcome.

Strategic level

- The development of DMAG provided a high-level cross sector working group, providing all representatives with valuable insights into each other’s ways of working, issues and solutions.
- The creation of DMAG sent out a strong message of closer working and cooperation across the representative trade bodies. The culture of working more closely together for the benefit of all was one which delivered benefits to all parts of the sector.
- The Group became the first point of contact for central and devolved governments, and as a small group, focusing on strategic issues worked well.
- DMAG provided a single voice to government on behalf of the entire sector.



- DMAG website provided a central point for disseminating information to all parts of the sector.

The creation of DMAG has worked well for the benefit of the sector and it is intended to continue beyond the current emergency for the benefit of the sector and, importantly, the bereaved.

Local level

The ability to deliver increased capacity requires partnership working between funeral directors and cemetery/crematoria providers. Embracing flexibility and innovation enables new and different ways of working.

Among the changes which have delivered benefits are:

- Regular meetings (weekly) between funeral directors, and cemetery/crematoria operators and suppliers to the industry provided a forum for issues to be discussed and better ways of working explored.
- Service delivery was streamlined through the adoption of electronic working, registration, electronic statutory forms and greater use of digital meetings.
- Closure of places of worship and catering facilities, along with reduced numbers of mourners, shortened the time taken on funerals. As a result, it was possible to increase the number of funerals undertaken during normal working hours.
- It was best to increase funeral capacity incrementally to meet demand in the following order:
 - a. Additional cremation slots Mon - Fri through shortening service times
 - b. Additional early and late slots, outside normal times
 - c. Provision of slots during weekends and bank holidays.
- Families encouraged to use the 'out of hours' times through funeral directors and cemetery/crematoria operators not adding additional charges.
- Encouraged maximum use of crematoria availability through:
 - a. Allowing mourners to attend chapel services, following risk-based assessments. Experience suggested families wished to use crematoria where mourners could attend
 - b. Streaming and recording of services so those beyond the immediate family could feel involved. (Live streaming can be problematic when there is a high demand for broadband in an area)
 - c. Promoted availability of slots at different crematoria to encourage families to use alternative facilities with capacity.

Whilst a small number of 'hotspots' developed at busy crematoria; the overall response enabled the sector to cope with the increased number of deaths resulting from COVID-19.

Greater clarity on the 'hotspots', along with identifying capacity nearby, could have been achieved if a UK wide, central service availability portal had been available.

Conclusion

The Deceased Management sector was able to add capacity to meet the demand of the increased death rate, enabling scaled back funerals, burials and cremations to continue in a caring and dignified manner.





Whilst the sector has worked closely with government for several years planning for a pandemic, the practical experience has provided several invaluable insights into how the process could be improved. To be better placed to meet the demand created by any subsequent waves, on behalf of the Deceased Management sector, DMAG are calling for the following specific outcomes:

1. A recognition by central government and the devolved administrations that the Deceased Management sector successfully achieved all three of its objectives during the pandemic:
 - Mortuary capacity was not overwhelmed
 - an increased number of dignified funeral services was delivered
 - an increased number of dignified cremations and burials was delivered.

These were achieved largely through extending existing services, based on extensive experience managing seasonal excess deaths and previous flu outbreaks.

2. The Deceased Management sector has unparalleled experience of coping with excess deaths. Central government and the devolved administrations use this resource in a proactive manner to advise, shape and develop policy and guidance. The sector should be provided with the opportunity to comment on draft policy and/or guidance, to ensure it accurately reflects the desires of government for the sector, that it is deliverable, and is sensitive to meeting the needs of the bereaved.
3. Building on the close working relationship, central government and the devolved administrations have developed with DMAG, strengthen their single coordinating point of contact for all Deceased Management legislation, policy and guidance being produced across government.
4. Large scale emergencies invariably result in the involvement of a range of support organisations, each bringing their own skills and expertise to the situation. Whilst the support is welcomed, the Deceased Management sector



had a clear understanding of the need and means for increasing capacity for disposing of the dead, and many of those adopting positions of the authority had not, resulting in confused messaging, creation of unwanted capacity, seeking and deploying Pandemic Multiagency Response Teams (PMARTs). A greater recognition of the expertise within the sector locally and improved coordination of LRFs in England and Wales by the lead government department, will ensure a more effective, proportionate, and consistent response to the demand for disposal.

5. Building on the close working relationship central government and the devolved administrations have developed with DMAG, recognise this grouping of sector representative bodies as a first point of contact.
6. In view of the success of the electronic/telephone registration and transmission of Disposal Certificates electronically, the General Register Office makes the current changes to the death registration process permanent.
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Interim Lessons Learned Paper Consultation Responses

Introduction

DMAG published an Interim Lessons Learned Paper highlighting what they considered to be the most important lessons which could be drawn from the initial experience, ready for any subsequent wave.

Having published the Paper, it was shared with all the participants of the Cabinet Office meetings and they were asked to comment on its content. This paper sets out the results of that consultation.

It contains three sections: firstly, a summary of the key points raised; secondly, the key points as drawn from the submissions; and thirdly, copies of the submissions.

1. Summary

- The content of the Lessons Learned Paper is broadly recognised and welcomed.
- It was best to increase crematoria capacity incrementally; extending existing systems rather than trying to invent new ones.
- The sector will continue to be represented by the trade organisations, whose members represent the majority of funeral directors, cemeteries and crematoria, including the large groups.
- In addition, the large groups, funeral directing and crematoria, will seek to access government.
- Government is unlikely to create a single department for death management. However, there should be a single point within government through which all proposals should pass to ensure consistency. The involvement of the sector at that stage will help ensure any proposals are fit for purpose.



- The streamlining of forms is welcomed and played a significant part in enabling the sector to cope with the excess deaths in a timely manner.
- Inconsistency has caused problems, from differing cemetery requirements, forms, to the engagement and effectiveness of the LRFs.
- The response of the sector has been hindered by the continued lack of access to government modelling. If it is not to be forthcoming, the sector should be told.

2. Key Points

The following are quotations from the submissions made in response to the Lessons Learned Paper.

- Government unlikely to create a single department to lead on death management.
- Big groups will maintain close links with government and DMAG should have closer links with big chains.
- The crematorium capacity portal is inevitable and desirable; it should be created to meet needs of CMA. In the short term hotspots should be managed by exception.
- I have read 'Lessons Learned' with interest and agree with the vast majority of its contents.
- Overall, the certification and disposal system has coped well over the last couple of months and on the whole, I would totally agree with all the Group's findings.
- In particular, the registration and cremation certification changes have proved to be beneficial, although issues have arisen with PMART cremation certificates.
- The issue of burial is hardly mentioned in the findings. With restrictions on the number of burials that can be accommodated by a cemetery (sometimes only two a day), significant delays have occurred between death and the date of burial. This leads to issues over mortuary/storage capacity for funeral directors.
- Restrictions imposed by cemeteries are not consistent and often questionable.
- It is the huge diversity of approach that is bewildering to funeral directors. Ultimately, it is the funeral directors who have to explain and justify these changes to the bereaved, not the cemetery staff.
- We believe the variable quality of the LRFs has been a huge issue and as a national organisation [REDACTED] have been well placed to see the huge differences in engagement and effectiveness. The basic model of LRFs is sound but the implementation is patchy. This needs to be resolved for the future.
- Although some crematoria have struggled with capacity ('hot spots' as you have termed them) these have been helpfully addressed by extended service times ([REDACTED] with an 8.20pm).



- From the perspective of the funeral director it is vital to know what policies and changes crematoria have introduced in respect of service times, numbers attending, flowers on coffins, committal and music, etc. The idea of a portal for restrictions etc is excellent, but the key is keeping it up-to-date.
- The issue of length of time to make funeral arrangements. Circumstances have arisen where no funeral instructions have been made by the NOK (Next of Kin), but the deceased remains in the coroner's mortuary or with the funeral director.
- From all the issues we have had to contend with in recent months, the most fraught concerns the situation where arrangements are agreed with a cemetery/crematorium then changed due to restrictions being introduced. Little or no notice is given and it resulted in scenes of greater anger and frustration from clients
- The content (Lessons Learned Interim Report) chimes with other feedback I have received, especially regarding the use of electronic forms and remote registration.
- This will help when I engage with government departments when next steps are considered.
- The response of the sector has been hindered by the continued lack of access to government modelling
- Better if Government had been frank from the start that they were unlikely ever to be able to share their modelling, leaving the NAFD (or whoever) to source their own insight.
- █████ worked pan industry to develop a set of protocols to protect both the care homes from what we as funeral workers may take in as well as funeral workers themselves. However, this could and should have been in place much earlier.
- We aren't convinced by the call for 'the creation of a single government department to take the lead on death management'.
- The MoJ have that responsibility already but they need greater influence equal to that of some of the other Government Departments
- We believe there is work to be done for Government to have ongoing insight into the funeral sector workforce – its size, age, skills and location. The country owes a lot to the efforts of the funeral sector workforce, which has not been sufficiently recognised, in the way they have stepped up and the support they have provided to the bereaved, nor the human impact on these workers who have had to take on a greater burden on behalf of the family
- The LRFs lack of coordination and direction was exacerbated by the fact that they were prepping for the worst-case scenario. As such they were standing up large potential mortuary sites and deploying the PMART process very quickly and without consultation with the industry
- In the early stages of the pandemic the issue of PPE – its correct usage and availability – took up too much bandwidth for many organisations, diverting man hours which could have been utilised elsewhere.
- DMAG should not be recognised by Government as the only consultative body for the sector going forward, if this precludes direct engagement with the largest providers in the sector.
- For second or subsequent waves of COVID 19 – we need early warning indicators as infection rates and deaths increase to enable rapid planning and action, ensuring we have the right resource and capacity



in the right geographical areas. Scenario modelling should be shared on a confidential basis with the sector to ensure risks can be flagged and mitigation strategies rapidly developed. We would further urge that funeral sector workers are considered as ‘first responders’ and given this status, as it will be important when a vaccination is finally ready and available.

- This is a really useful document – thanks so much for sharing it with us! I’ll circulate it to our whole team
- We made contact with the LRFs in which we operate towards the end of March, but beyond the acknowledgement of our communication, no contact has been received.
- We operate nine burial grounds: 3 in England, 3 in Wales and 3 in Scotland. The differing guidance and rules have been unhelpful and confusing to stakeholders and families.
- Paper forms and cheques delivered to an unmanned office from COVID homes and funeral professionals also add to the risk of transmission of the virus. Online forms and BACS payments are the future.
- Registrars’ Green Forms - These statutory forms really should be online.
- A really good and thoughtful document.
- I wholeheartedly support conclusion No 7, but our experience in trying to encourage families and funeral directors to use the [REDACTED] crematoria, which still had capacity, highlighted the difficulties in trying to implement it. For a number of reasons – local facility, previous funerals, reputational preference, etc, whilst people can still choose they will do just that, even if it means waiting.
- I was particularly interested to read that it was best to increase crematoria capacity incrementally; the point I make below about extending existing systems rather than trying to invent new ones.
- The creation of PMART: I believe these were intended to smooth the medical certification process, but in our experience did the complete opposite. Quite apart from the admin time this took to sort the problems out, it was also the sole reason for the only two cremations we had to postpone. I won’t go over all the



issues PMART created, but a key one, which the report also mentions elsewhere, is that it is an example of 'the wide number of government departments issuing communications and advice relating to the death management sector which was confusing.' In PMART's case it issued guidance which was contrary to the guidance issued by the MOJ to medical referees!

What worked well?

- The crematoria and funeral directors successfully coped with the level of demand by extending existing systems rather than trying to invent new ones.
- Staff commitment/goodwill, continuing to come into work despite the known presence of Covid-19 in the early stages (when most Council staff were being told to stay at home), rallying around and working extra hours.
- Corporate support through seconded admin and chapel attendance staff.
- Cremators performed as predicted in the emergency plan.

What were the challenges?

- Level of demand on the administration and the relentless funerals and cremations for the operational staff. Fortunately, this did not go on for too many weeks.
- Level of demand for webcasts and problems with some of the webcasts themselves for reasons beyond our control, including supplier and internet issues, but causing complaints.
- Neighbouring ██████████ Crematorium deciding not to facilitate funerals. This was the main cause of the extreme level of demand ██████████
- Difficulties experienced in home working for more than a limited number of admin staff because the cremation application and administration process is still largely paper based. This is a national issue and was raised at the APSE seminar last week.

Lessons learned on ways of working

- Chasing funeral directors for application forms sooner.
- Webcasts provided free, minimising the administration process and taking the sting out of complaints.
- How might these lessons influence any future response, should it be necessary?
- Emergency volunteers are not a new idea but in recent years their refresher training has fallen by the wayside and new recruits have not been sought when existing volunteers have left. In future refresher training should be offered and volunteer staff released to attend it on a more regular 'official' basis.
- Streamlining/computerisation of an online cremation application process



3. Responses

The responses in full are reproduced below.

1. The creation of a single government department to take the lead on death management.

I think it's highly unlikely that government will want to create a department to do this? It just won't be a priority for them.

2. Improved coordination of LRFs by the lead government department to ensure a more consistent response to their interaction with the deceased management sector.
3. DMAG to be the recognised consultative body by government for the sector.

I think it's inevitable that the big groups [REDACTED] will want to retain direct links with the government. I think it would be useful for DMAG to have stronger links with the big chains anyway.

4. Electronic forms to be retained and their wider adoption encouraged.
5. Telephone death registration to be retained.
6. Greater use of video conferencing to be encouraged.
7. A UK wide central cremation service availability portal is developed, and its adoption encouraged.

I do think this is inevitable and desirable. But I worry that we will end up with two competing systems – one for this and one for the CMA. The immediate need here I think is for a very few crematorium which had a capacity problem – and they could be managed manually by exception when necessary. So my instinct would be to do something quick and dirty now to solve those very local hotspot issues, but then to invest properly in one system which can be used for CMA purposes.

Thank you for this. I have read 'Lessons Learned' with interest and agree with the vast majority of its contents. I would indeed be pleased to accept your invitation to join conference meetings in due course.

In mid-March I returned to frontline funeral directing in central London just by sheer necessity. It's provided quite an insight into the changes and challenges that have emerged.

Overall, the certification and disposal system has coped well over the last couple of months and on the whole I would totally agree with all the Group's findings. I congratulate you on how succinctly these have been expressed. In particular, the registration and cremation certification changes have proved to be beneficial, although issues have arisen with PMART cremation certificates. Much is testament to the hard work and problem-solving approach by those involved.

Would I be permitted to make a few observations?





1. The issue of burial is hardly mentioned in the findings. I appreciate that with the number and type of burial grounds that it presents a huge difficulty in obtaining information and so any feedback that does get relayed to the DMAG is likely to come from crematorium managers who are also responsible for cemeteries. Although many of the funerals have been cremation, burials have continued and present a set of contrasting issues. (It will be interesting to see if a higher proportion is noted for the whole of 2020 when the stats are gathered next year.) With restrictions on the number of burials that can be accommodated by a cemetery (sometimes only two a day), significant delays have occurred between death and the date of burial. This leads to issues over mortuary/ storage capacity for funeral directors. However, the 'over-flow mortuaries' could well have assisted with this.

Secondly, restrictions imposed by cemeteries are not consistent and often questionable. For example, the number of mourners permitted to attend a burial. Why only ten when everyone is distributed around in the open and travelled to the cemetery in two cars? Then there is the insistence that the coffin is lowered prior to the service commencing. Again, the reason is unclear, although one cemetery official said it was so that she and her staff were '...not contaminated by the mourners', which actually was unforgivable. The withdrawal of putlocks, or the demand for £150 for disinfecting them along with the webs even if the deceased is not a Covid-case is odd. In addition, some

cemeteries provide rope to lower the coffin which is then thrown into the grave and buried. Cemetery authorities in London have enforced all or some of the above while others have carried on without any deviation from the norm. It is the huge diversity of approach that is bewildering to funeral directors. Ultimately, it is the funeral directors who have to explain and justify these changes to the bereaved, not the cemetery staff. On one occasion a cemetery worker dressed in his usual black suit greeted the funeral wearing surgical gloves (in a lovely shade of mauve) then walked all the way to the grave with the funeral director. Why he was sporting these gloves is anyone's guess as he did not receive documentation and was not required to assist at the graveside.

2. Cremation. Although some crematoria have struggled with capacity ('hot spots' as you have termed them) these have been helpfully addressed by extended service times (██████ with an 8.20pm). That said, some crematoria have taken chapels out of service. Why, when we need all the capacity we can get? But this has been at the cost of reducing the length of the service. In the circumstances I don't think anyone would disagree with this move, although clergy and celebrants have not always appreciated the need to shorten the service. In what was a first, I had to speak to the clergyman during service to insist that the ceremony was wound down as time had been exceeded and another funeral was waiting. There is an attitude of 'once it's started nobody can stop me' by some clergy and officiants which is hard to conquer. Then there is the insistence that the committal takes place. If it's fear that mourners will touch the coffin, then what's to stop them doing this when the coffin is in the hearse? Furthermore, can't the coffin be sprayed with disinfectant by crematoria staff before it is moved? From the perspective of the funeral director it is vital to know what policies and changes crematoria have introduced in respect of service times, numbers attending, flowers on coffins, committal and music, etc. The idea of a portal for restrictions, etc is excellent, but the key is keeping it up-to-date. Perhaps in London the LAFD could assist with this.





3. The issue of length of time to make funeral arrangements. Circumstances have arisen where no funeral instructions have been made by the NOK (Next of Kin), but the deceased remains in the coroner's mortuary or with the funeral director. It may be that the NOK is unwell, has died, there is no money to pay for the funeral or nobody is willing to make the arrangements, which are all the usual reasons. Even in non-covid time this situation periodically occurs and invariably drags on for months, much to everyone's frustration. During the covid period we were threatened with being fined for not removing the deceased from a coroner's mortuary as the person who initially told the coroner's officer that we would be handling arrangements became ill (and subsequently died) and the NOK could not decide on what to do. If a funeral director does not have instructions, then the firm should not take custody of the body. Ultimately, we were not fined; if we were it would come off the bottom-line, so client's always pay but indirectly. This is more to do with the coroner's office not giving any warning of this new ruling about fining and just presenting a fait accompli.
4. The transition period. From all the issues we have had to contend with in recent month, the most fraught concerns the situation where arrangements are agreed with a cemetery/crematorium then changed due to restrictions being introduced. Little or no notice is given and it had resulted in scenes of greater anger and frustration from clients. Whilst I appreciate the whole thrust of the restrictions are to minimise the risk whilst dealing with maximum numbers of funerals, we are still dealing with the bereaved who need information and understandable explanations, as funeral directors do.

I hope the above can be viewed constructively. I would certainly be very happy to discuss the issues more fully on the phone.

Finally, the ICCM has been excellent in distributing information to members and for that it needs to be congratulated.

Thank you very much for sharing this. The content chimes with other feedback I have received, especially regarding the use of electronic forms and remote registration.

This will help when I engage with Government departments when next steps are considered.

1. The response of the sector has been hindered by the continued lack of access to Government modelling. We can



understand why Government have been reluctant to share the information, particularly given the leaks at the start of the pandemic from meetings held with the sector. It would have been much better if Government had been frank from the start that they were unlikely ever to be able to share their modelling, leaving the NAFD (or whoever) to source their own insight. Throughout the crisis we have been working blind, hindering our plans and preparedness.

2. The response of the Government to the pandemic in care homes was too slow, in the early stages of the pandemic it was suggested to us that most deaths would occur in hospitals. The Government appeared unaware in the early stages that deaths would occur outside of hospital settings. We believe it is likely that the 'policy' of clearing of some NHS wards in hospitals of elderly people (untested) into the care home network to increase the capacity of the NHS accelerated the rate of infection in care home settings. Co-op worked pan industry to develop a set of protocols to protect both the care homes from what we as funeral workers may take in as well as funeral workers themselves. However, this could and should have been in place much earlier.
3. We aren't convinced by the call for 'the creation of a single government department to take the lead on death management'. The MoJ have that responsibility already but they need greater influence equal to that of some of the other Government Departments. Throughout the crisis we have seen the lead taken by No 10 and Cabinet Office – with HM Treasury holding the purse strings. In a crisis it is right that Cabinet Office take control given their civil contingencies responsibility. We also note the lack of direct engagement with businesses by Public Health England.
4. We believe there is work to be done for Government to have ongoing insight into the funeral sector workforce – it's size, age, skills and location. The country owes a lot to the efforts of the funeral sector workforce, which has not been sufficiently recognised, in the way they have stepped up and the support they have provided to the bereaved, nor the human impact on these workers who have had to take on a greater burden on behalf of the family. The sector been stretched significantly. The failure to recognise those working in the funeral sector as key workers from the outset (remember we had to lobby for this) was indicative of the lack of recognition the workforce has in Government.
5. We believe the variable quality of the LRFs has been a huge issue and as a national organisation the Co-op have been well placed to see the huge differences in engagement and effectiveness. The basic model of LRFs is sound but the implementation is patchy. This needs to be resolved for the future.

The LRF's lack of coordination and direction was exacerbated by the fact that they were prepping for the worst-case scenario. As such they were standing up large potential mortuary sites and deploying the PMART process very quickly and without consultation with the industry.

6. In the early stages of the pandemic the issue of PPE – it's correct usage and availability – took up too much bandwidth for many organisations, diverting man hours which could have been utilised elsewhere. The changes in PPE guidelines were particularly frustrating as they consistently downgraded the requirements, citing more knowledge of the virus as the justification, rather than the reality which was a lack of availability of the equipment. This created a lack of confidence in keyworkers with regard to the PPE they were being advised to use.

The current UK reliance on overseas supply chains for PPE is a huge risk. We understand this is being looked at and domestic capacity has been developed. This capacity needs to be maintained for the future.

7. DMAG should not be recognised by Government as the only consultative body for the sector going forward, if this precludes direct engagement with the largest providers in the sector. Whilst it is helpful to have a sector grouping which Government can consult with, our experience of DMAG given the fragmented nature of the industry is



that its' effectiveness was compromised by being too large and populated by representatives who held industry positions but had no experience of managing large scale businesses in the sector.

We have seen throughout the pandemic that large providers like Co-op and Dignity have had a key role to play, providing early insight into emerging trends and issues and flagging risks and issues, developing mitigation. In any future crisis of this kind the Government needs to commit to early and direct engagement with the largest providers, engagement with representative bodies should not be seen as a substitute for this.

8. For second or subsequent waves of COVID 19 – we need early warning indicators as infection rates and deaths increase to enable rapid planning and action, ensuring we have the right resource and capacity in the right geographical areas. Scenario modelling should be shared on a confidential basis with the sector to ensure risks can be flagged and mitigation strategies rapidly developed. We would further urge that funeral sector workers are considered as 'first responders' and given this status, as it will be important when a vaccination is finally ready and available.



[Redacted]

[Redacted]

This is a really useful document – thanks so much for sharing it with us! I’ll circulate it to our whole team. So sorry that it’s taken me a while to get back to you. Rebecca (cced, co-team lead) and I have a few tiny comments: -

On page 3 I wonder if you want to change “devolved Parliaments” to “devolved administrations”?

In the specific outcomes I wondered if on point 1 you all might want to highlight that you’re talking about a single government department to lead on death management in UKGov? Because devolved administrations have devolved powers on death management.

On point 2 I wondered if you might want to phrase that as coordination of LRFs in England and Wales? Our RRP’s work directly with SG rather than through UKGov and I’m not entirely sure what Northern Ireland’s set up is or what they call their equivalent groups.

And then I wondered if on point 6 you might want another word or two to say if it was greater use of video conferencing for consultation with industry that you recommended – just given that there’ve been so many discussions about broadcasting funerals. Have to agree I’ve found the video set up for DMAG meetings much easier to negotiate than some of the large teleconferences we attend!



ICCM Member

[Redacted]

Feedback on lessons learned from one of our members:

1. We have received welcome advice on a regular basis from ICCM’s Trevor Robson, whose email updates have been really helpful.
2. We made contact with the LRFs in which we operate towards the end of March, but beyond the acknowledgement of our communication, no contact has been received.
3. We operate nine burial grounds: 3 in England, 3 in Wales and 3 in Scotland. The differing guidance and rules have been unhelpful and confusing to stakeholders and families.
4. The sector’s historic reliance on paper-based systems has been a hindrance to working remotely.
5. Paper forms and cheques delivered to an unmanned office from COVID homes and funeral professionals also add to the risk of transmission of the virus. Online forms and BACS payments are the future.
6. Registrars’ Green Forms arrive in a multitude of formats and qualities. Some forget to scan the rear of the form. The email address to be used to return part C is rarely provided. These statutory forms really should be online.
7. On-site, there has been difficulty ‘policing’ access to the burial ground, the number of attendees at funerals and social distancing.



8. There should have been a standard design of poster - an info-graphic - for cemetery/crematorium managers to display. As it was, we each had to design our own.
I'll send any others through so you can collate everything.



I haven't seen the report before. It makes interesting reading, and perhaps unsurprisingly quite a lot of the conclusions reflect our own experiences.

Regarding the conclusions 4 to 7, I agree with them all in principle.

Concerning conclusion No 4, this is something I've been expecting to happen for several years since a revision of the legislation made 'electronic' signatures acceptable, but the recent experience has shown why it hasn't happened sooner because the industry as a whole simply isn't geared up for it. The suggestion in the body of the report that it 'streamlined' the process may have been so for doctors and funeral directors, but this was not our experience as I've already outlined – and judging by comments made at the Apse seminar others had similar experiences to us. We have discussed this with [REDACTED] and there isn't a quick fix – it is a longer term project and will require significant input from expert IT. However, I'm certain it's the way of the future.

I wholeheartedly support conclusion No 7, but our experience in trying to encourage families and funeral directors to use the [REDACTED] crematoria, which still had capacity, highlighted the difficulties in trying to implement it. For a number of reasons – local facility, previous funerals, reputational preference, etc, whilst people can still choose they will do just that, even if it means waiting. This will only change if you force the issue like [REDACTED] did by banning funerals – NOT something I would recommend! However it is a very good idea as it would stop some crematoria getting overloaded, with the consequent potentially detrimental effect on staff and equipment (the underlined an issue which I was surprised not to see highlighted in the report), and also speed up the rate of disposal which is so important to keep mortuary storage from being swamped and limit the additional distress to the bereaved having to wait a long time before the funeral.

I was particularly interested to read that it was best to increase crematoria capacity incrementally; the point I make below about extending existing systems rather than trying to invent new ones. This suggestion wasn't mine but came from a very useful meeting [REDACTED] and I had with two funeral directors just before lockdown. I thought it made so much sense I adopted it for the crematoria from then on and it worked. As I've already written, what the report doesn't say is that there should be a limit to this for the sake of the staff and equipment and the longer term sustainability of the operation if the high death rate continues for any length of time. Also, if you shorten funeral times this can potentially impact on social distancing in bringing different funeral parties in contact with each other and reducing the amount of time available to ventilate and sanitize the chapel between services.

The report also contains details about the potential folly (my words!) of inventing new systems unnecessarily; in this case the creation of PMART. I believe these were intended to smooth the medical certification process, but in our experience did the complete opposite. Quite apart from the admin time this took to sort the problems out, it was also the sole reason for the only two cremations we had to postpone. I won't go over all the issues PMART created,





but a key one, which the report also mentions elsewhere, is that it is an example of ‘the wide number of government departments issuing communications and advice relating to the death management sector which was confusing.’ In PMART’S case it issued guidance which was contrary to the guidance issued by the MOJ to medical referees!

And this is [REDACTED] own observations submitted to his local death management cell:

1. What went well?

- Funeral services continued uninterrupted throughout.
- The crematoria and funeral directors successfully coped with the level of demand by extending existing systems rather than trying to invent new ones.
- Staff commitment/goodwill, continuing to come into work despite the known presence of Covid-19 in the early stages (when most Council staff were being told to stay at home), rallying around and working extra hours.
- Control measures which prevented the spread of infection to all the staff.
- Corporate support through seconded admin and chapel attendance staff.
- Cremators performed as predicted in the emergency plan.

2. What were the challenges?

- Four admin staff infected at the same time with Covid-19 and two shielded.
- Administration issues including a relatively new office team following a retirement, death in office, and a resignation, and also opening the new office at [REDACTED]
- Difficulties experienced in home working for more than a limited number of admin. staff because the cremation application and administration process is still largely paper based. This is a national issue and was raised at the Apse seminar last week.
- Emergency legislation radically changing the cremation application process overnight – normally such changes would be preceded by months of industry-wide consultation. This caused chaos to begin with (the opposite of what it was meant to achieve) with no one knowing exactly what they should be doing, especially doctors, and instead of a set of application forms all arriving neatly together in one envelope they were coming in dribs and drabs and had to be collated. We were getting a paper form, another scanned as an email attachment, another filled in on line and sent by email, and another by fax – and this was for just one application!
- Level of demand on the administration and the relentless funerals and cremations for the operational staff. Fortunately this did not go on for too many weeks.



- Level of demand for webcasts and problems with some of the webcasts themselves for reasons beyond our control, including supplier and internet issues, but causing complaints.
- Neighbouring [REDACTED] Crematorium deciding not to facilitate funerals. This was the main cause of the extreme level of demand at [REDACTED]
- Different controls and restrictions at neighbouring crematoria – the potential consequences of this were also discussed at the Apse seminar.

3. Lessons learned on ways of working?

- Administration procedures adapted to address the changes in the application process and collate the forms more efficiently.
- Chasing funeral directors for application forms sooner.
- Webcasts provided free minimising the administration process and taking the sting out of complaints.
- Seconded staff and chapel emergency volunteers trained to help build resilience in case of crem staff sickness.

4. How might these lessons influence any future response, should it be necessary

- Having navigated our way through the first wave puts us in a much better position should there be another.
- Resilience of the crematoria office team is improving all the time, although with two shielded and working from home we are still reliant on seconded staff. If they are withdrawn before their replacements are recruited and trained this will potentially cause problems even without another wave.
- It might be a good idea to set up a channel of communication/working group with neighbouring crematoria to help achieve a degree of coordination of response.
- Emergency volunteers are not a new idea but in recent years their refresher training has fallen by the wayside and new recruits have not been sought when existing volunteers have left. In future refresher training should be offered and volunteer staff released to attend it on a more regular 'official' basis.
- Streamlining/computerisation of an online cremation application process.

On reflection, after people, the lynch pin to our enabling to keep the service running was/is IT. Without it, even in normal times, the service would struggle to keep going for long – but this would have been even more the case in the recent emergency with the 'phones through the computer system since last August (thankfully, as we could use them from home) and with so much information and documentation coming down the line. The crematoria IT has a long history of problems, although this has been better recently since we it was upgraded to Windows 10, but I don't know how much resilience is built into our computer systems.



Deceased Management Advisory Group

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