

July 2024

A report by Down to Earth

A patchwork of provision: council funerals across the UK



Acknowledgements

This report would not have been possible without the help of the Down to Earth team in gathering the website data, and all the volunteers who carried out the website user testing and phone call research. We are also very grateful to abrdn Financial Fairness Trust for their support and funding for this work. abrdn Financial Fairness Trust funds research, policy work and campaigning activities to tackle financial problems and improve living standards for people on low-to-middle incomes in the UK. It is an independent charitable trust registered in Scotland (SC040877).



Foreword



Lindsay Mace,
Down to Earth co-manager (influencing
lead), Quaker Social Action

“Every year councils in the UK arrange thousands of funerals for people who have died in their area where no other arrangements are being made. This is a legal duty, but Down to Earth research in 2021 suggested this duty may not always have been met, and that standards varied across councils.

When someone is dying and has no family or friends to arrange their funeral, they should be able to find out from their local council what will happen to them after they die. For example, will they be buried or cremated and will their wishes be respected? A bereaved person who is unable to make funeral arrangements, for instance because they have no way of paying for them, should be able to contact someone at the council who can advise them.

Reaching out to a council for help in these situations can demand courage and involve a host of complex emotions. The process needs to follow the law, be compassionate, simple and equitable.

This report seeks to identify if anything has changed since our 2021 report, or if the problems we found are more widespread. In doing so it offers a unique insight into what it is like for a member of the public trying to get information and help, and shows that some of these things are still far from guaranteed in parts of the country.”

Lindsay Mace,
Down to Earth co-manager (influencing lead),
Quaker Social Action

<https://quakersocialaction.org.uk/we-can-help/helping-funerals/down-earth/campaigns-research>

Contents

Executive Summary	5
Recommendations	6
1. Introduction	8
2. Research aims and approach	10
3. Results: online transparency and the telephone journey	13
4. Further analysis: digital gatekeeping and honouring the deceased's wishes?	22
5. Good practice	27
6. Engagement with councils	29
7. Conclusion	33
8. Notes	35
Appendix	39

Executive Summary

- **Government guidance not being followed:** A survey of 102 council websites across the UK suggests that more than half of councils in England and Wales are not fully following Government guidelines on council funerals (sometimes known as public health funerals).¹ More than a third (36) had no information online for the public about their council funeral provision and of the 66 that did, over a quarter (18) gave no contact details for people who need to notify their local authority of a death requiring a council funeral. (See the appendix for detailed data on individual councils.)
- **Inaccurate information:** 7 in 10 of the 66 websites that did have information contained incorrect or misleading information, with half of this wrong information relating to the circumstances in which a council funeral can take place.
- **Labyrinthine journey:** Phone calls to 54 councils reveal the unnecessarily labyrinthine journey bereaved people would have to go through to reach the right department at some councils. Only a third of correct departments (15 of 46) were reached in one call.
- **Access denied:** Where we were able to conclude our calls, nearly a quarter of councils (11 in 47) turned us away or presented us with significant barriers.
- **Legal compliance in question:** Nearly 4 in 10 councils appeared to interpret narrowly their legal requirement regarding the deceased person's wishes, suggesting they could bury or cremate them against their wishes. Note - this is of the 46 councils that, through their online information or in a call, gave some indication of their legal duty in this area and/or respecting the wishes of the deceased.
- **Lack of information:** Of the 66 councils with online information, less than half (29) stated their policy on whether people can attend council funerals and only a quarter (17) clearly stated that cremated remains, or ashes, can be collected without restriction.
- **Change is possible:** 11 of the 40 councils we researched in 2021 have improved their online information, either by making changes to their existing information or providing some where there wasn't any. However, five councils have dropped points and one has deleted their page.

7 in 10

of the 66 websites that did have information contained incorrect or misleading information, with half of this wrong information relating to the circumstances in which a council funeral can take place.

Recommendations

Local government

1

Ensure there is information about your council funeral provision on your council's main website and regularly check it is accurate. Use the UK Government's [Public health funerals: good practice guidance](#) and [Down to Earth's website](#) guides. Where people can access the internet, this will save your staff time in answering questions and getting people through to the right department easily.

2

Make this information available on your intranet or knowledge hub to make life easier for your staff and to save them time. We encountered many busy, apologetic call handlers who were keen to try and help but just didn't have what they needed.

3

Ensure all switchboard call handlers know which department to transfer people to, and what role name to ask for. If you have an automated switchboard provide this information to staff in the departments people will most likely select, like adult social care, cemeteries or benefits team.

4

Provide a direct line for the specific team, rather than an automated switchboard for the whole department. If they must be transferred to an automated switchboard, like Environmental Health, equip your staff to advise what option to select. Consider how a bereaved person might feel if they hear this recorded message, 'the council doesn't provide a pest control service', or have to select 'pest control' as the option.

5

Ensure staff have information about sources of support for raising funds, beyond just government benefits, so that where a caller would like to take responsibility for a funeral, but doesn't have the funds, they can explore this.

6

Consider if all staff who regularly come into contact with bereaved people have the skills and support they need, to protect both them and the public they engage with. Bereavement or grief awareness training is available from organisations like [Cruse Bereavement Support](#) and the [National Bereavement Service](#).

7

Organise training for relevant staff on the Funeral Expenses Payment (FEP) (England, Wales and Northern Ireland) and its complex eligibility criteria – [book with us](#). We encountered lots of councils giving incorrect information about it, including the false assumption that if someone is ineligible it must mean there are funds available. There are many reasons why an applicant may not be eligible for a payment, even if they are in receipt of a qualifying benefit.

8

Consider setting up a municipal or residents' funeral service, like [Tameside](#) or [Salford](#) councils, offering a less expensive simple funeral option for residents. This might enable more bereaved people to take responsibility for the funeral where funds are a barrier.

9

Review your policy and procedure regarding how you ascertain the deceased person's wishes for burial or cremation, ensuring you meet your legal duty. People can feel strongly about this for all kinds of reasons, not just religious or cultural ones, and they are more likely to have told someone verbally than written it down.

10

Review your policies regarding attendance and the return of ashes - most councils allow both. If you don't, is there a good enough reason why not? If you are concerned about family disputes regarding the ashes, there are ways to deal with this, such as splitting them between family members. A blanket ban on returning them is unnecessary – consider booking [training with the Institute of Cemetery and Crematorium Management](#).

UK Government, Northern Ireland Executive and Scottish Government

1

Create statutory minimum standards for council funerals, covering both provision and process to stop the current postcode lottery and ensure everyone who needs a council funeral, both those who have died and those who are bereaved, is treated with dignity and respect.

2

Increase the 'other funeral costs' amount of both the Funeral Expenses Payment and the Funeral Support Payment to £2,484 – this is the portion of the payments that can be used for funeral director fees. £2,484 is the average cost of funeral director fees for a simple Attended Funeral in the UK, as assessed by the Competition and Markets Authority in its 2024 Review of market outcomes.

3

Expand the eligibility criteria for these funeral payments - bring the Funeral Expenses Payment criteria in line with the Funeral Support Payment, as around 40% fewer people can access a payment in England, Wales and Northern Ireland than in Scotland. Extend both payments to students.

1. Introduction

At [Quaker Social Action](#), one of our longest running projects is [Down to Earth](#), which runs a UK-wide funeral costs service. Thousands of individuals each year access our extensive digital resources designed to help people plan a meaningful funeral that is as affordable as possible. Meanwhile, we give direct support to those in the greatest need and this front-line experience places us in a unique and privileged position to speak truth to power about funeral poverty in the UK. Advocating for high standards in council funerals, holding local authorities to account regarding both their legal duty and accompanying Government guidance, and exposing any failings is a key part of this work.

For many clients our support takes the form of helping them to find a less expensive funeral director, consider different choices, access any money left by the deceased person and to raise funds, whether from statutory, charitable or community sources. However, sometimes these options are limited, and it isn't possible for them to take responsibility for the funeral. For some it would mean taking on unmanageable debt, while others don't even have that option, unless they were to borrow from an illegal money lender, potentially risking their safety. Turning to the council to arrange the funeral can be the only option but making this happen can be a significant challenge.



When do councils have a duty to arrange a funeral?

Legislation in all UK nations places a duty on councils to bury or cremate someone who dies, or is found dead, in their area if no other arrangements have been, or are being, made.² An exception to this comes where another authority was responsible for the person's care or accommodation immediately before their death. The three pieces of relevant legislation (England & Wales, Northern Ireland and Scotland) all carry slightly different clauses regarding this.³

Situations where no other funeral arrangements are being made can arise because:

- **The deceased has no (traceable) adult family or close friends**
- **No one is able to take responsibility for the funeral – e.g. due to lack of funds or capacity**
- **No one is willing to take responsibility for the funeral – e.g. the family may have been estranged for many years due to challenging circumstances, like abuse.**

What does a council funeral look like?

In England, Wales and Northern Ireland, councils must not cremate someone where they have reason to believe this would be against the deceased person's wishes.⁴

In Scotland, councils 'must ... have regard to any wishes that the person expressed as to means of disposal of the person's remains', thereby covering not just a rejection of cremation but also of burial, and, importantly, 'whether the person was of a particular religion or belief'.⁵

Aside from this however, there are no legal requirements regarding how councils carry out their duty or what arrangements they make. England and Wales are covered by the [UK Government's Public health funerals: good practice guidance](#), but sadly this is unenforceable, and nothing similar exists in Northern Ireland or Scotland.

As a result, while many councils pride themselves in carrying out these funerals in a way that would be indistinguishable from any other funeral, that can be a postcode lottery. For example, councils are not legally required to provide an attended funeral, though most do.⁶ Where a service does take place, they tend to be simple and can happen early in the morning but this varies greatly. Councils then have the right to recover the associated costs, or however much is available towards them, from the estate of the deceased person where any exists.

2. Research aims and approach

Obtaining a council funeral is not always easy, not for our trained staff when supporting Down to Earth clients, let alone for bereaved people who may well not know the law or how councils work.

So, [in 2021, we published a report](#) that dug a bit deeper into the practices of 40 councils in England and Wales. It raised some concerns about whether all councils were meeting their legal duties, and about what some bereaved people might experience if they contacted their council. Three years on, we returned to see what, if anything, has changed, and to expand our research to 100 councils across the UK.

For this report, we split the councils across the UK as follows: 84 England, 10 Scotland, four Wales, and two in Northern Ireland to reflect, broadly, population rates.⁷ In choosing the 60 new areas we aimed for as wide a geographical spread as possible, while also considering population size and the most recent official deprivation indices for each nation.⁸ By sampling councils that are likely to have a high proportion of people living in or close to poverty, we aim to have the biggest impact where it might be needed most.

Councils researched

England



Scotland



Wales



Northern Ireland



Website analysis

The first step in seeking any kind of help is to contact the right people – in this case, the appropriate department at the relevant council. This should be easy, but our experience has shown that the reality is often very different. All councils are structured differently, so while the responsibility might fall to bereavement services in one area, in another it will be adult social care, somewhere else environmental health, finance or even court of protection. Unless there is clear, easily accessible information on the council's website, it can be like trying to navigate a maze.

The UK Government's good practice guidance states, 'it is helpful to have a written policy on public health funerals which can be shared publicly on the local authority's website.' While the guidance only applies to England and Wales, we believe it is reasonable to expect the same standards of Northern Ireland and Scotland, and have used them here to evaluate performance in the absence of national guidelines. The top three pieces of information suggested for inclusion are:

- » **Explanation of the circumstances in which a funeral will be offered.**
- » **How to notify the local authority of a death which may require a public health funeral, including contact details.**
- » **Local arrangements for a public health burial or cremation and the features of any service (if offered) – including the approach to considerations related to religion or belief.**

We surveyed the websites of our 102 councils to see if there was any information online for people who need a council funeral (see end note for why it is 102 councils).⁹ Where this existed, we collected the following data:¹⁰

- » **The page's position on the website and how it could be found**
- » **What details were included:**
 - ▶ Any inaccurate information
 - ▶ Whether it said if burial or cremation was the default
 - ▶ Any information given regarding the type of grave or lair
 - ▶ The relevant requirement to consider the deceased person's wishes regarding burial or cremation
 - ▶ Any information about what is provided for the funeral
 - ▶ Whether family and friends are allowed to attend
 - ▶ Whether ashes can be returned
 - ▶ The council's ability to reclaim costs from the deceased person's estate
 - ▶ Whether any contact details were provided.

Of course, no matter how good the information is, it is only useful if you can find it. Based on each page's positioning on the website, how it could be found and its title and sub-title, we assigned each a findability of very easy, easy, OK, difficult or very difficult (see page 39 for the definitions).

In addition, user tester volunteers carried out searches of all the council websites that held information to record whether they were able to find the page within five minutes and, if so, how long it took them and how they found the page.¹¹ They also made notes about their experience. We wanted a volunteer team that represented mixed confidence levels with the internet but, despite our best recruitment efforts, all the user testers were confident with using the internet, so it is reasonable to assume the results would be less positive for anyone not confident. To ensure volunteers did not become too familiar with what to look for or where to look, each volunteer tested no more than five pages, except in one case where they did another three after a month's break.

Phone call exercise

Volunteers also carried out an exercise making phone calls to 54 of the councils to see how easy it was to get through to the right department and what response they received to their enquiry.¹² We selected the councils by splitting them across the nations, and roughly factoring in the existence, or not, of information on the website and of contact details, and factors such as rural versus urban areas, population, and deprivation. We used the following scenario for calls:

The caller was seeking help for a friend whose adult child had died and not left any funds. The body had been collected by a funeral director as the death happened at home, but they couldn't afford to make any arrangements. The coroner/procurator fiscal was not involved as the death was expected. The friend's income was just over the threshold for pension credit, and they owned their property so didn't get housing benefit but had only £300 in savings. They had already been told they were not eligible for a government funeral payment.

We chose to do this with volunteers taking the role of someone needing help and information as we anticipated that this would provide the most realistic picture possible of how people enquiring about council funerals are treated and how easily, or not, they are able to access the right department. We felt we would not get this if we called in our usual persona as a charity working to tackle funeral poverty.

We anticipated that it might take several calls to get an outcome, so volunteers recorded how many and the length of any time on hold. They also did their best to verify if the number or department they were directed to was the correct one, but this was not always possible because voicemails we left and emails we sent did not always get a response. They then recorded their experience of the call and the outcome including, where possible, whether a burial was an option.

3. Results: online transparency and the telephone journey

Online transparency

Publicly available information

Over a third of councils (36 of 102) did not have information for members of the public needing a council funeral.¹³ And seven webpages were not found by our user testers within the allotted five minutes of searching the main council website. In Scotland, 6 of 10 sampled councils had information but only one of the four Welsh councils did and neither of the two councils in Northern Ireland did.

Contact details

Almost a quarter of councils (15 of 66) that did provide information gave no contact details at all. Another three appeared to give them, but for a stated purpose other than needing a council funeral, like enquiring about statistical data. 12 only provided an email address, disadvantaging people who are digitally excluded, and one of those was so hard to find that the council was scored as having nothing. Only just over half (34 of 66) appeared to give a direct phone number for council funerals, or switchboard with the specific role name to ask for.¹⁴ This included all the councils with online information in Scotland and Wales.

Inaccurate information

46 of the 66 councils with information had one or more pieces of inaccurate or misleading information about council funerals. The most common category (34 councils) was the representation of when councils are legally required to carry out a funeral. For example:

Cheshire West and Chester:

'We may be able to help by arranging a funeral ... if the deceased was a resident and died in the borough'. Residency is irrelevant, it is only about where they died. (This text has now been removed after we provided them with an embargoed copy of the report.)

Dudley Metropolitan Borough:

'The Council can only assist if the DSS [sic.] is unable to do so'.

While it is understandable that councils want the Department for Work & Pensions (DWP) to pay out of their budget where possible, councils have a legal duty to bury or cremate someone if no one else is doing it, regardless of a family member's eligibility for benefits. This statement also misses the fact that the average FEP award pays less than half the average cost of a simple funeral and people may not have the money for the shortfall.¹⁵

North Lanarkshire:

‘When someone dies and there is no known next of kin, we have a responsibility ... to make arrangements for the remains to be buried or cremated’. As this is the only information provided, it misleadingly frames the responsibility as only relating to those with no next of kin. (This text has now been amended after we provided them with an embargoed copy of the report.)

Rochdale Borough:

The council's information claims it has the authority to ‘recover costs from ... a family member such as parent or spouse’, which is not true.

A few councils also seemed to conflate the inability to take responsibility for a funeral with refusing to do so, making for quite a harsh tone in their information. This also fails to acknowledge the complex and understandable reasons why some people might not want any involvement, such as having been subjected to abuse by the person who died.

For six of these 45 councils, the only information considered misleading regarding council funerals was stating that a hospital or health authority is responsible for arranging the funeral when the person died in their care, but without making it clear there is a local arrangement to this effect. As hospitals do not have a legal duty to take responsibility as councils do, this could be misleading. Our team have also previously been batted back and forth between council and hospital in some areas where there does not seem to be a clear agreement.



Return of ashes

Only a quarter of councils that provided online information, all in England, (17 of 66) clearly stated that ashes can be collected if wished, without mention of any restrictions. However, of these, Derby said it charges ‘a small fee’, meanwhile Hounslow and Rochdale, which both had two pages with information, only explained on one of them that the ashes can be collected.

Meanwhile another nine, all in England bar one in Scotland, indicated it might be possible to claim the ashes but with significant restrictions, such as only in ‘exceptional circumstances’ or if the deceased person left ‘specific written instructions’.

Cornwall’s website was clear that ashes will not be returned, and another four in England said the ashes will be scattered at the crematorium. One of those, Gateshead, only said this on their statistical page in the information transparency section of the website, no details were given on the page in the deaths section.

All this goes against Government guidance for England and Wales, which clearly indicates that it should be possible for people to collect the ashes, stating, ‘It is suggested that the local authority sets a timeframe for retaining the ashes of the deceased to allow the next of kin (or another friend or relative) to claim them if they wish. It is helpful to include this information in any written policy on public health funerals, and to ensure that the next of kin is made aware.’

1/4

Only a quarter of councils that provide online information, all in England, (17 of 66) clearly stated that ashes can be collected.

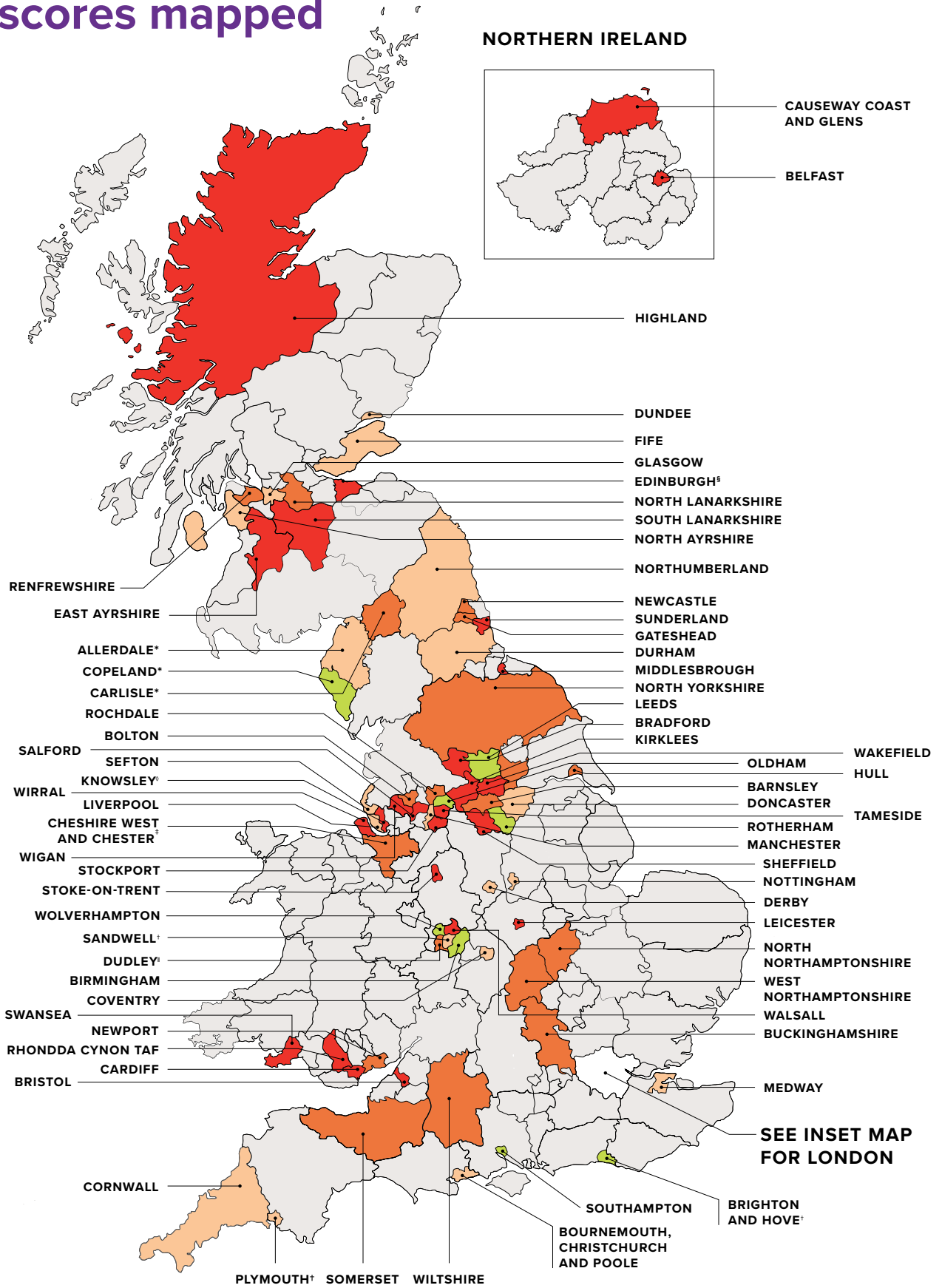
Scoring

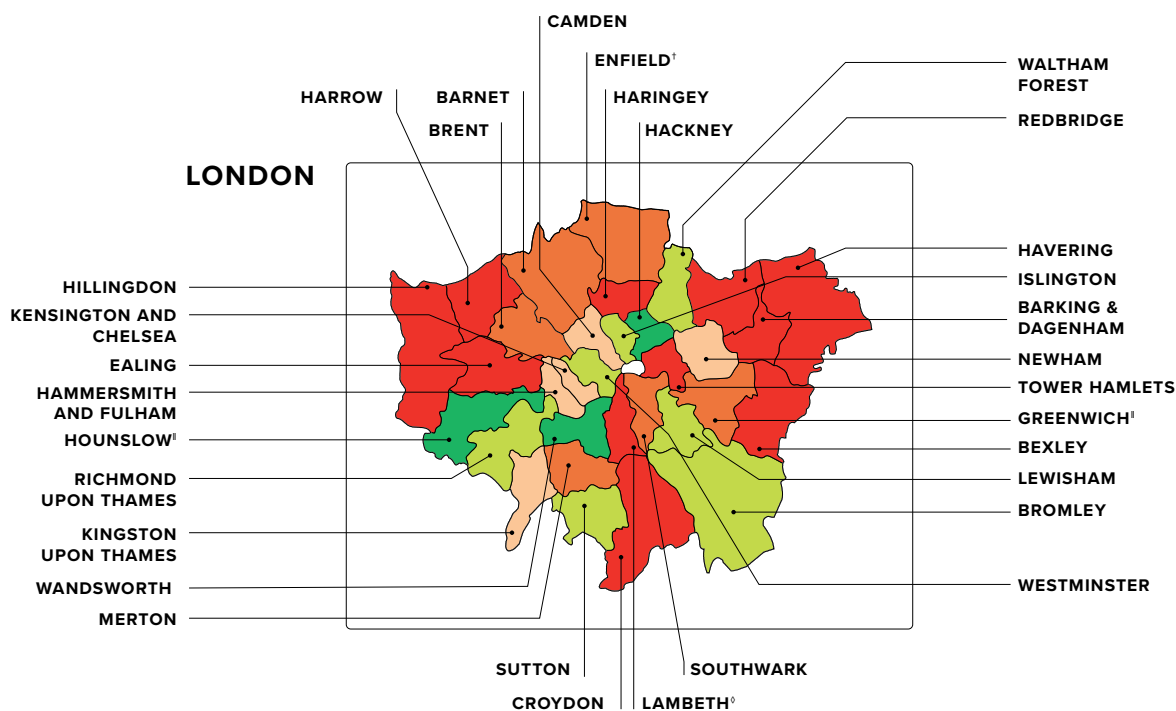
We used a scoring system to assess the online information of the 66 councils that provide some details on their website, scoring them out of a total of 13. **No councils got the maximum score.**

The top scoring councils	Score	The bottom scoring councils ¹⁶	Score
Hounslow (Funeral Policy) ¹⁷	12.5	Dudley, Merton, Rochdale & Wiltshire	1.5
Hackney & Wandsworth	10.5	North Lanarkshire	0.5
Bromley, Islington & Lewisham	10	North Yorkshire	0
Copeland & Wolverhampton	9.5	Southwark	-1.5

We then divided the scores into score ranges and assigned colours and category names to those ranges for depiction on the maps on pages 16 and 17: Leadership (score 10.5-13), Aspiration (score 7.5-10), Progression (score 4-7), Foundation (score 3.5 & below) and No action (no online information). The map key and notes can be found on page 17.

Online transparency scores mapped





*Allerdale Borough, Carlisle City and Copeland Borough councils joined together to become Cumberland Council in April 2023, but the process of bringing all the websites and services together has not yet been completed. As Cumberland Council did not have any information on its website about council funerals, but the original three councils did, we have based our assessment on these.

†The scores and categorisation of these councils have changed since our engagement with them following our research: Brighton and Hove City (Leadership), London Borough of Enfield (Progression), Plymouth City (Leadership) and Sandwell Metropolitan Borough (Aspiration). See page 29-32 for more details.

‡On providing Cheshire West and Chester with an embargoed copy of the report we were informed that the webpage had a prominent link to a 'Public health funeral protocol' document containing the required information. We have been unable to verify when this document and information was added so it has not been included in the report analysis. They also advised they had updated the webpage. We re-scored all the information, and their score has increased placing them in Leadership.

§City of Edinburgh Council created their page too late on in our report writing for it to be included. However, we have scored it as sitting in Foundation.

||Hounslow, Dudley and Greenwich all had two pages with information, the scores of which fall into different categories. On the map, Greenwich has been assigned the colour of their main 'Public health funerals' page, and Dudley according to their more public facing 'Municipal funerals' page in the deaths section of the website, which was found first by our user testers. Hounslow is categorised based on their main 'Funeral policy' page, which we assessed as 'very easy' to find, rather than their other page which we defined as 'very difficult' to find. It should be noted however, that it was this other, lower scoring page that the user tester found, but they were not told there were two pages and so did not continue looking.

¶Knowsley and Lambeth councils had statistical information about the funerals they carry out, but no information deemed to be for people who might need one. In 2021 we included these kinds of pages in the scoring, but decided not to this time.

Website user testing

Our volunteer user testers searched 65 council websites looking for 68 webpages, as some councils have more than one page relating to council funerals.¹⁸ **9 out of 10 (61) pages were found within the allotted five minutes, with 49 of those taking less than two minutes but most (38) were found in under one minute.** However, despite the figures seeming largely positive, many of the comments people shared indicated quite a lot of frustration and confusion, even for some of those found relatively quickly.

'I tried to search through their services but didn't get anywhere. From the web address it looks as though I would have had to go through the Pests & Pollution services to get to it.'

'Absolutely terrible! The information was NOT under "Deaths", but under "Cemeteries and crematoria", and on that page I could only find it through a small link on the right side saying "Public health funeral", purely because I assumed that's what it could be! Really bad usability.'

'When using the search bar, it shows articles that aren't exactly relevant and found the link I needed pretty buried.'

Most of the pages (32 of 61) were found by using the websites' search functions, though this wasn't always the sole method tried.

'Funeral'

The most used search word/phrase was 'funeral', which was reassuring as this is the word used in our own findability assessment.

1 in 10

Despite allowing five minutes for each search, 1 in 10 webpages were not found.

Phone call experience

Our callers managed to reach the right department at over 8 in 10 of the councils contacted (46 of 54). However, only a third (15) of these were reached in one call, counting the first call to the switchboard and the first transfer they made, or number they provided, as one call. Four of these 15 required our caller to send an email first before a conversation could take place, one of which only responded after we sent a chase email a week later. 25 took three or more calls, with five taking eight calls, one of which we never heard back from.

Across all departments, where we were able to conclude our calls - some councils did not respond to us - nearly a quarter of councils (11 in 47) turned us away or presented us with significant barriers. Six were by the departments that deal with council funerals and five were by another department or the switchboard, where we were mostly told, incorrectly, that carrying out funerals in this way just wasn't something that the council did. The initial response from another two councils was also to turn us away but, when we pursued it, we were promised a call-back, though this didn't happen.

Of the 42 outcomes that we got from departments that deal with council funerals, we were turned away, or presented with significant barriers, by six (1 in 7), as opposed to 7 in 10 from our much smaller sample in 2021. It should be noted however, that our scenario this year, for good reason, differed in one key way – our caller was not the bereaved person but their friend. We highlight this because, in the course of our frontline work, we as a third party have previously been told that a council would carry out a funeral for someone, only for the client to encounter gatekeeping when they

1 in 7

Of the 42 outcomes that we got from departments that deal with council funerals, we were turned away, or presented with significant barriers, by six (1 in 7).

themselves then got in touch. We can only hope this dynamic wouldn't have played out with any of the councils in our research.

Equally, while it was routinely checked that we had approached the government for a funeral payment, beyond this, the content and tone of the conversations varied a lot, even where a council funeral was a possibility.

Some departments quickly reassured our caller they would help, while advising that the council would need to speak with the bereaved person and check the deceased person's finances; some gave information about cheaper options, either sensitively or in a way that left our caller feeling pushed towards a direct/unattended cremation, though even this was not financially viable; others asked lots of questions about the bereaved person's financial circumstances, including asking to see evidence, or indicated they needed more information to assess the situation. A couple in England directed the caller back to the DWP first, adamant, incorrectly, that the funeral payment was a possibility simply because the next of kin was in receipt of a state pension; and a few helpfully signposted to our funeral costs service, Down to Earth.

We were pleased to find that most department representatives responded in a sympathetic, reassuring, or helpful manner. In contrast, some approached the conversation very matter-of-factly without any real care or, even worse, in a hard, accusatorial fashion, such as this quote from one council staff member, 'Sometimes the picture people paint can be deceiving ... You would be surprised what people have [meaning money].'

Where the right department turned us away or threw up significant barriers, these fell into two categories. Either the referral had to be made by a professional: the coroner at one council and the city mortuary at a second, while a third had a much broader list, including a GP. **Or the existence of surviving family** meant they would not help (three councils), which, in the case of Lewisham, was in direct contradiction to their website information. Enfield was the only one of these three to give information about a support service beyond government benefits, which our caller advised had already been ruled out: they signposted our caller to Down to Earth, and we know if we were not able to find options for them, we would then have referred back to the council.

We acknowledge that the scenario we presented, where the body had already been collected by a funeral director and there was no hospital, coroner or procurator fiscal involved, was a less common one. It was clear that, for some council representatives, it was a very unusual situation to encounter. However, those council responses requiring a professional referral were still in contrast to other councils that made provision for referrals from the public. Even if a form had to be submitted, we were emailed this for the bereaved person to complete.

Ultimately, there is no provision in any of the relevant Acts for councils to impose either of these rules – if arrangements are not being made then the local authority has a legal duty to take responsibility.

Jonathan Carmichael, Down to Earth volunteer

Sometimes the right person to speak to was in Adult Social Care, other times in Bereavement Services, or Environmental Health, or Cemeteries. I'd get passed around these departments, plus the Registrar's Office, until someone knew the right person. Often the poor person in the wrong department would be searching on the council's website. If only their own website showed the department and phone number, it would save the council workers so much time – as well as the bereaved person of course.

I was also surprised how differently the “right person” behaved when I reached them. Some were ever so nice, sympathetic, and explained things clearly and with language that was respectful and comforting. They explained positively what was possible, as well as the limitations. They might say reassuring things, like this one: “Please reassure her. It happens a lot more than people think. She doesn't need to feel bad about it. It's life. We can do something, and as quickly as we can. Then she can mourn. She can breathe out.”

But other people treated it just like a process, without the humanity, and no expression of sympathy - I could have been arranging to get my car serviced. They'd list only what was not possible. They'd say it was all about cost. Some would presume that everybody really had the money. And worst of all, some of them got it wrong, contradicting what was on their website, or their legal duty: “If there is a family member still alive then it is not possible.”

Kay Shaw,* Down to Earth volunteer

It was mostly difficult to phone through to the right person. Phones were not answered for long periods and the voice recognition system was truly infuriating, due to its limitations in accuracy and responsiveness. This, and never being clear which option to select with a keypad operated switchboard, meant it was sometimes necessary to redial multiple times to find a route through.

It became clear towards the end that emails were a quicker method to make contact, but that is no use for those who are digitally excluded. I also sometimes found it hard to decipher the advice on those websites that had it.

Often there was a genuine search to help at the first point of contact, followed by a lot of trial and error in who you spoke to. There were a range of responses to my questions. They went from the kind and thoughtful; where care was given to the words used to describe the potential burial or cremation, to feeling like I was given short shrift for asking, or given a mechanical description.

If I was told the council could carry out the funeral it was a good feeling. However, everyone should be able to access the right information and support if they are unable to make funeral arrangements themselves, not because you asked the right questions or managed to navigate a complex local authority information system.

**Name and some details changed for privacy reasons*

4. Further analysis: digital gatekeeping and honouring the deceased's wishes?

Attendance at council funerals

In total, across both sets of research, we found that over 8 in 10 councils (40 of 49) allow attendance, 38 in England and two in Scotland.¹⁹ However, more than half (37) of the 66 councils with online information did not state their policy on this, with 11 of those only implying it.²⁰ Of the additional policies we identified during our calls, East Ayrshire, Havering, Newport and Plymouth hold non-attended burials or cremations. Among the 40 that allow attendance, Wiltshire's website referred specifically to letting 'close friends' know the funeral details so they can attend, appearing to exclude family, thereby fitting with the council's description of their legal duty, which ignored the possibility that family members may be unable to arrange the funeral but still keen to attend. Meanwhile, North Ayrshire's website said they are 'not obliged to keep interested parties advised about arrangements' but will provide the details if contacted. We were also disappointed to notice that during our period of research Bournemouth, Christchurch and Poole's policy has shifted from allowing attendance to holding unattended funerals.

Over half

37 of the 66 councils with online information did not state their policy on attendance.

Poor wording or digital gatekeeping?

Of the councils that were marked down for inaccurate or misleading online text regarding their legal duty to carry out a council funeral, 10 councils gave very different information during our call with them, at odds with the wrong information online. For example, most commonly the website suggested their duty would not apply if there were surviving family, but this was not then borne out in the call. What does this signify?

In some cases, it could be that the online information has just been badly phrased or not fully thought-through; once you start giving a set list of specific scenarios it can be easy to miss something out. However, we do have to ask whether some councils are intentionally using this phrasing as a form of digital gatekeeping.

For example, one of our call volunteers, directed incorrectly to the Registrar's Service at Buckinghamshire, where they were told there was no council department that could help, said they decided not to attempt to find another route as the website said, 'If the deceased has family or next of kin, we will not arrange a funeral'.

We spoke with Buckinghamshire Council in February to discuss this and were told they do not have a blanket policy of refusing to carry out a council funeral when there is surviving family or next of kin. Among other things, they committed to reviewing the wording on their website. At the time of writing, while the above statement has been removed, the information still frames their legal duty as only applying when there is 'no family or a next of kin cannot be traced'.

Meanwhile, our user tester who searched Merton's website commented that, because the information was headed 'If there is no next of kin' but there was a next of kin in the scenario they had been given by us for testing, they 'weren't 100% sure it was relevant'.

Whatever the reason for the inaccurate or misleading online text, those impacted potentially go beyond members of the public reading the website and could extend to anyone calling up for help. Where a council had information online, it was not uncommon for the council representative to read from it in answer to our caller's enquiry. While this showed the value of having information on the website, including for council staff, it is vital that it is accurate.

Online transparency – what has changed since 2021?

Who is leading the way?

Eight of the councils we researched in 2021 have increased their score, either by making changes to their existing online information or providing some on their main website where there wasn't any. Another three councils that had no information online at all in 2021 have created pages. Change is possible.

Islington has most improved their score out of those councils that had some information online in our earlier report. In 2021 there was no information on their main site, only on the Islington & Camden Cemetery Services website, but after creating its own page it has jumped from -3 to 10 (+13).

Lewisham, Waltham Forest and Wandsworth all now have pages when they previously didn't have any information online.

Hounslow has the highest scoring online page of those councils that have improved, up 11 points to 12.5, though we note that this page wasn't the one our user tester found, but the old one.

Who has gone the wrong way?

Five councils dropped their score due to changes in content, link titles or findability. This includes Brent and Birmingham who also made positive changes. Brent have added an email address and removed 'pauper's funeral', but now excludes those with next of kin in their page title and link description. Birmingham has provided more information about what to expect from a council funeral but text, both in the body of the page and the titles of various links to it, exclude some scenarios, such as when there is next of kin.

Hammersmith & Fulham dropped the most, by 3 to a score of 5 due to a change in its findability. Our user tester's experience was also not that positive: it was in the bottom four of those that were found, in terms of the amount of time it took, and they also commented, 'Difficult, the front page is busy and not clear, the only real way to find what you're looking for is by searching'.

Hull is next in line, which has dropped 2 to 3.5 due to providing fewer details in their information.

Most disappointingly though, **Haringey** has gone from being the highest scoring council in 2021 (11.5) to having no information online.

Also, 12 councils tested in 2021 still do not provide any online information for people who may need to contact them about a council funeral.

Legal duty regarding the deceased person's wishes

During the period of our research, one of our caseworkers and her client had a very challenging experience trying to secure a council burial for her mother who had died, despite burial clearly having been the mother's wish.

The Government guidance for England and Wales lists eight options available to councils for ascertaining a deceased person's wishes, including 'discussing the deceased's wishes with the next of kin, close family or friends', and 'looking for any indication of the individual's wishes, religion or beliefs if searching the property of the deceased'.

Concerningly, however, our research suggests that the restrictive approach our caseworker experienced regarding this may be more widespread.

Across our website research and phone calls, we found that in one or both of these methods of investigation, **nearly 4 in 10 of councils (18 of 46) - 16 in England and 2 in Scotland - appeared to interpret narrowly their legal requirement** to bury someone where there is 'reason to believe' cremation would be against their wishes, or simply to 'have regard to any wishes' regarding the funerary method in Scotland.²¹

The circumstances given in which burial could take place were religious/cultural/ethnic reasons or written evidence/instructions (six); religious/cultural/ethnic reasons only (six); written evidence/instructions only (three), one of which said these had to be signed; only if a grave is already owned (two); and only if the cost is not unreasonable (one). Some of these also specifically mentioned, in addition, that if a grave was already owned then burial could take place there.

4 in 10

4 in 10 of councils (18 of 46) appeared to interpret narrowly their legal requirement regarding the deceased person's wishes.

We note that, of those councils we called that also had online information, two gave a better response over the phone, indicating their practices might be more positive than their information suggested. One of these has also changed the relevant text on its webpage after seeing an embargoed copy of this report. However, four confirmed what was on their website and another two, while inconclusive, were not reassuring.

One council says online that, beyond written evidence, it is only if the religion ‘forbids’ cremation, which could, for example, exclude people of the Catholic faith as, while cremation is no longer banned, some Catholics remain opposed to it. This policy was taken one step further in our call to the council, when we were told burial was only possible if the wishes were in a will, despite only 44% of adults having one, and if it was a religious wish, we were advised to approach ‘the local mosque or synagogue as they usually have a fund to help’.²² It’s clear from our volunteer’s notes that the council officer was empathetic and gave very helpful information, so it is likely this last bit was intended in the same vein but it still raises concerns. It not only confirms a narrow understanding of which religious beliefs can lead to a wish for burial, excluding Rastafarianism too for example, but also assumes that some minorities should collectively pay for their rights to a culturally appropriate burial, unlike majorities.

Of the 66 councils with online information, only seven in England specifically referred to verbal wishes being accepted, or to speaking with family or next of kin to help determine the deceased person’s wishes. This included Dudley which presented a confusing picture as it has two pages, one of which said cremation will take place unless there is an existing plot, while the other said they will carry out a burial if the deceased person left paperwork to that effect, or ‘told family or friends’.

The reality may well be much worse than this though. Some councils that give an indication online of having a legal duty in this area and/or of respecting the preferences of the deceased don’t specify how they go about determining them, or what evidence they will accept. Many more make no reference to this aspect of the funeral arrangements at all.

7 of 66

Of the 66 councils with online information, only seven in England specifically refer to verbal wishes being accepted, or to speaking with family or next of kin to help determine the deceased person’s wishes.

Jordan's story*

Jordan's mother died in England in 2023 leaving no funds. Jordan has some learning difficulties and is unable to work, so she contacted Down to Earth for help with the funeral costs. Despite receiving Universal Credit, she was not eligible for the Funeral Expenses Payment from the Department for Work and Pensions as her sibling was not also in receipt of a qualifying benefit. Jordan also wasn't eligible for enough charitable funds, so a council funeral was the only option.

The council had a legal duty to carry out a burial if they had reason to believe cremation was against Jordan's mother's wishes. Yet, despite her having clearly expressed a wish to be buried before she died, achieving this proved incredibly difficult, and likely impossible for Jordan without our help.

When her Down to Earth caseworker, Susanne, contacted the council, she was advised that unless Jordan's mother left a will stating her wish not to be cremated, then a cremation would be arranged.

Susanne said, 'There was no compassion or understanding, the council officer's manner was dismissive and showed no expression of care. It would be deeply concerning if this approach was used when speaking to somebody who is bereaved.'

When prompted, the officer agreed to discuss it with his manager; he would then contact Jordan directly. Sadly, when he did, the position hadn't changed.

'Jordan said the council officer had told her, "If you want a burial, you will need to raise the funds for the plot.[†] A burial can only be on religious grounds, or if there is a will." It caused Jordan significant stress to think that a cremation would take place in direct contrast to her mother's wishes.'

So, Susanne spoke to the manager herself, who said a three-way call could take place between the council, Susanne and Jordan where they could make a case for having a burial.

However, a week later, following Jordan's struggles to get three months' worth of her mother's bank statements, the officer said he was not prepared to do a three-way call. He stated, again, that without a will detailing the mother's wishes the council did not have to comply. Susanne asked to speak to his manager again.

That same day, Jordan received a request from the officer for further paperwork so a discussion could take place with his manager. Then, nearly two weeks after Susanne initially contacted the council, Jordan received an e-mail from the council officer confirming they would arrange a burial.

'This process, and the uncertainty surrounding the funeral was extremely stressful for Jordan', reflected Susanne. 'She found the officer uncaring and lacking in empathy. I find it very difficult to believe that the council would have agreed to a burial without my intervention.'

**Name and some details changed for privacy reasons*

[†]Of almost £1,000

5. Good practice

As well as areas for improvement, our research revealed a lot of good practice. We have selected some examples.

Online information

Deceased person's wishes

Doncaster, Kingston, Lewisham, Northumberland, Oldham and Southampton all referred to verbal wishes for burial being accepted, or to speaking with family or next of kin to help determine the deceased person's wishes.

Newcastle indicated their default is to carry out a burial but, in a step beyond their legal requirement, said they will also honour a wish for cremation. Manchester also implied they will honour religious wishes for a cremation.

Burial

Hackney, Hounslow and Lewisham all explained that a 'shared' or 'public' grave means that other people could be buried there and how many, plus whether the grave is marked, with Hackney being the only one of these to mark it with a headstone once it's full. Meanwhile, Hounslow highlighted the other people buried could be of multiple faiths and **Birmingham** explained they won't be from the same family.

Funeral content

Camden gave a lot of information about what is provided, which it said will be 'in line with the deceased's wishes wherever possible', including a religious or non-religious service and 'sufficient bearers to transfer the coffin to the chapel'. They also gave details of the crematorium and cemetery that would be used, and explained what isn't available, such as flowers or a facility for mourners to pay their last respects in the chapel of rest.

Sefton said music can generally be provided given sufficient notice, details about the deceased person can be provided to write the eulogy, and the coffin will carry a brass name plaque. **Brighton and Hove** gave limited information, but they did mention providing silk flowers for the coffin, and family and friends may have some input into the service such as choosing a piece of music.

Attendance

Manchester and Wolverhampton stood out as they said they make every attempt to hold the funeral on a date/time suitable for family and friends.

Return of ashes

Hackney, Islington and Waltham Forest were the only ones to comment clearly on the amount of any fee for people to receive the ashes - they don't charge. Meanwhile, **Hull** was the only council to state its time frame for collection (one month).

Estate

Birmingham, Hounslow and West Northamptonshire all gave examples of what counts as part of a deceased person's 'estate', e.g. any money or valuable belongings, which is important as lots of people won't be familiar with the term. They also explained that the funeral costs are the first call on any money in that estate (though none highlights that secured debts, like a mortgage, take ultimate priority). It is crucial people understand this as we often speak to clients who, keen to do 'the right thing', intend to use any small sum in the deceased's account to pay off debts they have left behind, like utilities or rent. Meanwhile **Kensington and Chelsea** said they will not sell items of a sentimental nature.

Phone call experience

Bromley, Hull, Rotherham and Somerset all advised our callers about the funeral director charges the bereaved person would already have incurred by having the body collected, and would be responsible for, some expressing concern for them that the fees might continue to increase.

Manchester advised that a burial would take place in a grave with people who are not part of the family, going on to explain that the bereaved person could not be buried there with them later. Our caller noted this was the only council in their list who made this implication clear to them.

Brent said they don't question too much the reasons why a funeral can't be arranged, acknowledging these can often be numerous and complex. Our caller noted they were helpful and supportive and gave a full understanding of what to expect with a burial.

Birmingham stood out amongst that caller's list of councils as giving an 'exemplary' response and was said to cover the difficult issues in a way that was clear and with sympathetic, positive language.

Leicester and Rochdale were both described as sympathetic and keen to counter any perception of stigma, with Rochdale saying, 'There used to be a stigma, but this has changed. We make no judgements'.

Sutton gave lots of careful and clear advice, empathetically delivered in a way that our caller felt he was 'dealing with a real person, who was doing their best to help me in a difficult situation, helping me to understand and to help my friend'.

Wolverhampton said they would do all they could to help and recognised the stress the bereaved person must be under.

6. Engagement with councils

Our overall aim with this research and report is to identify any areas where improvement is needed and to engender change, by exposing failings and highlighting good practice, while being as fair as possible. As a result, we wanted to reach out to councils in advance of publication to discuss our findings. As a small charity with limited resources, we were not able to do this with all 102 councils, and so we focused on those where we had most concerns about whether they were fulfilling their legal duty.

We contacted the councils between 8 February and 8 March. At the time of going to press we have not been able to verify the status of all the actions that were committed to.

Buckinghamshire
Our dialogue with them
<p>We spoke with Buckinghamshire Council in February to discuss their online information including its description of their legal duty regarding when to carry out a council funeral, especially the statement that ‘If the deceased has family or next of kin, we will not arrange a funeral’. We were told they do not have a blanket policy of refusing to carry out a council funeral in this situation. We also raised our caller’s experience of trying to reach the right department and being turned away by the Registrar’s Service. In addition, we voiced concerns about their wording regarding carrying out a burial when they ‘can establish that a cremation would go against the deceased[’s] wishes’ as it said a burial will be ‘considered’, appearing to imply it might not happen.</p>
What they committed to
<ul style="list-style-type: none"> • Additional training for newer staff in their Customer Contact Centre and Registrar’s Service • Updating their internal knowledge hub for staff • Reviewing the wording on their website.
What has changed
<ul style="list-style-type: none"> • In May, after providing an embargoed copy of the report, the above statement about not providing a funeral where there is family or next of kin was removed. Following further correspondence, another sentence that also suggested this was amended appropriately. However, the opening line about duty remains, ‘We have a legal obligation to arrange a funeral where the deceased have no family or a next of kin cannot be traced’. • The sentence about carrying out burials has been slightly modified but still contains the word ‘considered’. • No other changes have been made to the website and, while some improvements have been made, overall, the changes have not altered their score.

City of Edinburgh
Our dialogue with them
<p>We met with City of Edinburgh Council to discuss the response we got from Bereavement Services, that a council funeral was only possible if there was no next of kin. Edinburgh disputed our finding regarding this; they felt there had been a misunderstanding on our part. However, on looking at our scenario they assessed that the situation had not yet met the threshold for a council funeral. They acknowledged though, that they should ideally have taken a phone number in order to speak with the bereaved person and that they would normally give information about possible charities and cheaper options. We also raised our caller's experience of getting to the right department, and of the absence of any information on the website.</p>
What they committed to
<ul style="list-style-type: none"> • Raising our difficulty getting through, including being directed to wrong departments, with their Contact Centre.
What has changed
<ul style="list-style-type: none"> • We were advised that they were in the process of redeveloping their webpages to include information on council funerals, and this has since been done and scored by us at 4.5.
London Borough of Enfield
Our dialogue with them
<p>We met with Enfield Council to discuss the response we got from Environmental Protection, that a council funeral was only possible if there was no next of kin, especially as we were told we could access one with a similar scenario in 2021. We also discussed the low scoring of their online information, including its framing of the council's legal duty as being for when there is no one to make arrangements, and our caller's experience of getting to the right department.</p>
What they committed to
<ul style="list-style-type: none"> • Requesting additional information, more than in an initial call, by email 'to be able to help those in deserved need' • Informing their Customer Contact Centre to change their script process, so a caller goes 'direct to the right business support team and issue guidance' • Updating their website.
What has changed
<ul style="list-style-type: none"> • The website has been updated, including a correct representation of the council's legal duty and a contact email address, raising their score from 1.5 to 7.

London Borough of Lewisham

Our dialogue with them

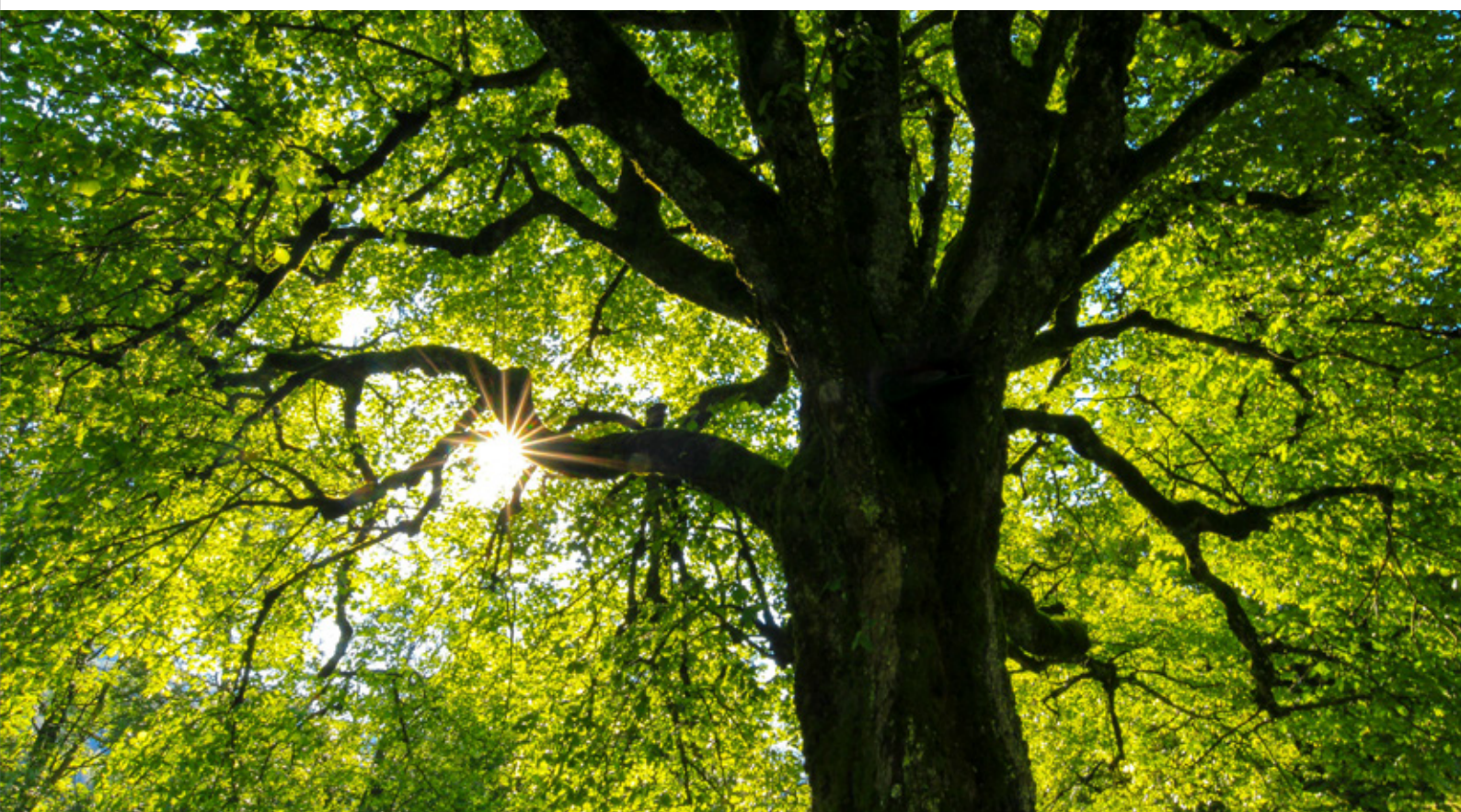
We corresponded with Lewisham Council to discuss the response we got from the Property and Protection department, that a council funeral, or public health funeral as it is called in Lewisham, was only possible if there was no next of kin, especially as we got the same response in 2021. They advised that someone struggling to afford the funeral should be advised 'around [the] DWP and affordable alternatives' before moving to a public health funeral 'if there is nothing that can be done at all'. We also raised our caller's difficulty of getting to the right department.

What they committed to

- Updating all call centre staff so that any callers are directed appropriately
- Ensuring relevant departments are aware of the council's arrangement for public health funerals and that they make sure information is available – on-line and when called directly – regarding the options for grants.

What has changed

- Call centre and Bereavement Services staff have been updated so they know where to direct callers regarding public health funerals.
- 'Information on public health funerals' has been added to one of the options on the Bereavement Services automated switchboard.



Plymouth City
Our dialogue with them
We met with Plymouth City Council to discuss the fact we were told that burial was not a possibility, despite this having been the deceased person's wish. We also raised the lack of information on their website and our caller's experience.
What they committed to
<ul style="list-style-type: none"> • Considering how to make the phone pathway easier within the council's digital only approach, including the options available on the Environmental Health automatic switchboard • Speaking to the relevant team leader to prevent the term 'pauper's funeral' being used again • Holding a training refresher with relevant staff to address the issues highlighted by our call, including the council's policy regarding burials – that they will carry one out if it is established that the deceased person did not want cremation • Updating the website in line with the Government's good practice guidance, and QSA's guide.
What has changed
<ul style="list-style-type: none"> • Plymouth City Council advises that all actions have been carried out • We have confirmed there is now a 'public funerals' option available on the switchboard • The website has been updated, raising their score from 6 to the maximum of 13.

We also spoke with **Brighton and Hove City** to clarify a statement on their website that we were concerned indicated they might not honour someone's wish to be buried if the cost was deemed unreasonable, but we were reassured this was not the case. As a result of our contact they updated their website to ensure it was not misleading and to address some of our other feedback, raising their score from 7.5 to 10.5.

We contacted **Sandwell Metropolitan Borough** in March to query the following statement on their website: 'If there was an expressed wish by the deceased for any other type of funeral such as burial, the Council will endeavour to carry out those wishes. If the cost is deemed to be unreasonable, officers will produce a report ... as to the reasons why the wishes of the deceased cannot be agreed to.' In contrast, our caller was told a burial would be possible in a public grave.

We did not get a response to our March enquiry but after providing an embargoed copy of the report, Sandwell removed the second sentence about cost. We reflected that the word 'endeavour' could still communicate that a burial is not guaranteed but the council responded that they believe the statement implies 'that this will be the outcome we can and will provide, with us undertaking burials previously when the need has been identified which we can evidence'.

They also changed their wording about what happens to the ashes to say that they will be scattered 'unless there is an expressed wish' and advised us that this 'can refer to both, the deceased's wish or if a family member [or] friend comes forward'.

We have rescored their page as a result, and it has increased from 7 to 8.5.

7. Conclusion

Due to the different sample sizes, no overall comparisons can be drawn with our 2021 report, but there are two broad observations worth making. In this larger data set, where online information about council funerals does exist it is more likely to contain detail on the aspects that we assessed, than was observed in our smaller 2021 sample. For example, in this report, of the 66 councils with information, over four in 10 stated their policy on funeral attendance, whereas our research three years ago found just six councils in 26 did this. While this is positive, disappointingly the proportion of local authorities that didn't have any council funeral information online for the public is almost the same for both data sets, at more than a third.²³

As a result, over three years on from the publication of the UK Government's good practice guidance in 2020, our research this year, based on over a quarter of councils in the UK, suggests that most councils in England and Wales are not abiding by the guidance, at least in respect of online transparency. Scotland and Northern Ireland still do not even have any guidance, but if the analysis is applied UK-wide the outcome is the same. This is far from good enough.

It is not acceptable for a bereaved person, or someone at end-of-life with no next of kin, to have to make up to eight calls, navigating multiple switchboards, to access information and someone who can help. This naturally involves telling their story several times, about which people can feel immense pain and shame. It also fails the council staff who are encountered along the way.

Besides these failings, of particular concern in this research was the apparent limited application of some councils' legal duty regarding honouring the deceased person's wishes for burial or cremation. What is driving this? Several councils, in their conversations with our callers, referenced the higher burial cost in their area and the need to keep costs down; is this resulting in a narrow criterion for confirming the wishes of the person who has died, and possibly even a hierarchy of merit in terms of reasons, with simple personal preference at the bottom? Both would be contrary to the relevant legislation and to government guidance.

While carrying out council funerals is a legal duty, and therefore contained in mandatory spending and shouldn't be affected by budget cuts, it is perhaps unsurprising that some councils are especially concerned about cost. For example, The Guardian reported recently that nearly 1 in 10 councils in England project they will become bankrupt in the next year.²⁴ We recognise the extreme pressure on many councils in the UK.

It is a pressure that comes not just from cuts to their funding, but from the current cost-of-living crisis and inadequate benefit rates, which may be leading to an increase in council funerals, both where there is and is not a next of kin. Huge rises in the last five years were recently found by Sky News in some parts of England, a need that was also alluded to in our research.²⁵ One council told our caller that they 'deal with these requests almost on a weekly basis', while Rochdale's policy stated, 'the Service has seen a year on year increase in the numbers of referrals' and that a reason frequently given 'is that families cannot afford the cost of the funeral. They explain they are not eligible for the Department of [sic.] Work and Pensions Social Fund'.

Both government funeral payments, the FEP (from the DWP and Northern Ireland's Department for Communities) and the Funeral Support Payment (Scotland), are inadequate, with the average awards paying less than half the cost of an average simple funeral.²⁶ There are also significant problems with the eligibility criteria, particularly with the FEP where thousands of people who are in receipt of an eligible benefit or tax credit are nonetheless unable to access a payment.²⁷

Funeral poverty is a complex, many layered issue, but each of the Acts relating to council funerals are clear that a council's duty kicks in when it is apparent that no other arrangements have been or are being made. We acknowledge that the purpose of the Acts is to protect public health by ensuring all bodies are buried or cremated, but this does not mean the duty only applies when there is no next of kin or when the referral is made by a professional. Councils have a duty to confirm the absence of arrangements before taking on the responsibility, but this must be done in a way that respects both those who are bereaved and those who have died, as is made clear in the guidance for England and Wales.

We encountered assumptions that the bereaved person may be lying about their finances or those of the deceased, framing all surviving family as 'refusing' to make arrangements rather than being unable to, and misinformation about government funeral payments, including how much they pay, who can access them and presumptions that anyone who can't get one must have access to funds.

Where a family member or friend would like to arrange the funeral, it is potentially of benefit to everyone that they are assisted to access support that may help them to do so, for example through obtaining government or charitable funding. However, this signposting needs to be realistic and practical, and informed by a good understanding of benefit eligibility criteria (FEP, FSP and the Bereavement Support Payment). This approach must also recognise that there are various reasons why a council funeral might be needed, including the next of kin having a lack of capacity or a strong reason for not having any involvement.

There is hope, however, both in the good practice we have seen, and in the results yielded by our engagement with councils since 2021, though this is time-intensive and, as a small charity, our reach is naturally limited. Only time and experience will tell if, as well as the easier win of improving online transparency, any necessary cultural shifts take place, such as helping, holistically, those who turn to a local authority for a council funeral, rather than creating barriers. As our research showed, for good and bad, just because a website promises something doesn't necessarily mean it will happen, but at least if the policy is available, any misapplications of it can be challenged, whether by a member of the public or a professional.

All councils in England and Wales should be following the UK Government's [good practice guidance](#), and we'd like to see those in Scotland and Northern Ireland applying the same principles. However, to ensure no one is subjected to a postcode lottery, the UK and Scottish Governments and the Northern Ireland Executive must bring in statutory minimum standards for council funerals across the UK. This is something we hope will also be recommended by the Law Commission for England and Wales in due course: it has acknowledged the need for scrutiny in this area by committing to looking at the rules and standards applying to council funerals in the third phase of its new project, Burial, Cremation and New Funerary Methods.²⁸ We hope this report will prove a useful resource in that work.

To help both councils and bereaved people, these statutory minimum standards must then go together with providing sufficient funding to local authorities, so they can provide the services that are needed, and to uprating and expanding the funeral payments so they are adequate and reach everyone in need of them.

8. Notes

- 1 These funerals are often called public health funerals, after the Public Health (Control of Disease) Act 1984, which applies to England and Wales, but they can also be referred to by many other names including council, community and municipal funerals. Some councils don't even have consistency on their own websites. We will use the term council funeral in this report.
- 2 **England and Wales:** Public Health (Control of Disease) Act 1984, S.46 '(1) It shall be the duty of a local authority to cause to be buried or cremated the body of any person who has died or been found dead in their area, in any case where it appears to the authority that no suitable arrangements for the disposal of the body have been or are being made otherwise than by the authority.' www.legislation.gov.uk/ukpga/1984/22/part/III/crossheading/disposal-of-dead-bodies
Northern Ireland: Welfare Services Act (Northern Ireland) 1971, S.25 '(1) It shall be the duty of every district council to cause to be buried or cremated the body of any person who has died or been found dead in its district, where it appears to the district council that suitable arrangements for the disposal of the body have not been, or are not being, made otherwise than by the district council.' www.legislation.gov.uk/apni/1971/2/section/25
Scotland: Burial and Cremation (Scotland) Act 2016, S.87 '(1) This section applies where— (a) a person dies or is found dead within the area of a local authority, and (b) it appears to the authority that no arrangements have been or are being made under section 65(2) or 66(2) or otherwise for the remains to be buried or cremated. (2) The local authority must make arrangements for the remains to be buried or cremated (but subject to subsections (3) and (4)).' www.legislation.gov.uk/asp/2016/20/section/87
- 3 England and Wales: Public Health (Control of Disease) Act 1984 S.46 (2) & (2A)
 Northern Ireland: Welfare Services Act (Northern Ireland) 1971 S.25 (4)
 Scotland: Burial and Cremation (Scotland) Act 2016 S.87 (3) & (4)
- 4 England and Wales: Public Health (Control of Disease) Act 1984 S.46 (3)
 Northern Ireland: Welfare Services Act (Northern Ireland) 1971 S.25 (5)
- 5 Scotland: Burial and Cremation (Scotland) Act 2016 S.87 (5)
- 6 94% of local authorities who responded to 2020 Freedom of Information requests from Royal London unequivocally stated that they allowed mourners to attend.
- 7 England and Wales: www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/bulletins/populationandhouseholdestimatesenglandandwales/census2021
 Northern Ireland: www.nisra.gov.uk/system/files/statistics/census-2021-population-and-household-estimates-for-northern-ireland-statistical-bulletin-24-may-2022.pdf
 Scotland: www.nrscotland.gov.uk/statistics-and-data/statistics/statistics-by-theme/population/population-estimates/mid-year-population-estimates/mid-2021
- 8 English Indices of Deprivation 2019: www.gov.uk/government/statistics/english-indices-of-deprivation-2019
 Northern Ireland Multiple Deprivation Measure 2017 (NIMDM2017): www.nisra.gov.uk/statistics/deprivation/northern-ireland-multiple-deprivation-measure-2017-nimdm2017
 Scottish Index of Multiple Deprivation 2020: www.gov.scot/collections/scottish-index-of-multiple-deprivation-2020/

- Welsh Index of Multiple Deprivation 2019: www.gov.wales/welsh-index-multiple-deprivation-full-index-update-ranks-2019
- 9 Our 100 councils became 102 because Allerdale Borough, Carlisle City and Copeland Borough councils joined together to become Cumberland Council in April 2023, but the process of bringing all the websites and services together has not yet been completed. As Cumberland Council did not have any information on its website about council funerals, but the original three councils did, we have based our assessment on these.
- 10 Website data was primarily gathered between August and October 2023. In compiling the report, we have referred again to the webpages, and in doing so discovered that the pages on the Manchester City and Bournemouth, Christchurch and Poole websites have changed. We have therefore assessed them based on the new information. We acknowledge that it's a possibility some other changes may have taken place since we gathered the data but, as far as is reasonably possible, it is accurate at the time of writing.
- 11 The bulk of the user testing exercise was carried out in October 2023, with three final tests done in the November. We confined our testing to the councils' own websites, as opposed to any other means of searching, such as using a search engine.
- 12 This is twice the number we contacted for our 2021 report. The calls were primarily carried out between October 2023 and February 2024, with a couple of follow-up calls in March 2024.
- 13 Knowsley Metropolitan Borough and the London Borough of Lambeth councils both had statistical information about the council funerals they carry out, but no information deemed to be for people who might need one.
- 14 We did not have capacity to test all the numbers, so it is possible that some phone numbers that appear to be direct numbers are actually for an automated department switchboard. We know this was the case for Plymouth because of our phone call exercise.
- 15 In England and Wales in 2020-21 the average award was £1,838 – just 44% of the average cost of a 'basic funeral' in the UK that year, based on the latest available DWP figures.
www.gov.uk/government/publications/social-fund-annual-report-2020-to-2021
www.sunlife.co.uk/siteassets/documents/cost-of-dying/cost-of-dying-report-2021.pdf/
- 16 After we engaged with the London Borough of Enfield following our research, they edited their page increasing their score, so while they are listed with their original score in the main score table, they are no longer in the bottom four scores and so have not been included here. Cheshire West and Chester, after seeing an embargoed copy of the report, informed us that their webpage had a prominent link to a 'Public health funeral protocol' document containing the required information. As we have been unable to verify when this document and information was added they are listed with their original score in the main score table but, as they are no longer in the bottom four scores, they have not been included here. Rochdale and Dudley had two pages with different scores, so their scores here are the midway point of those two scores.
- 17 This is Hounslow's new page since our 2021 report, but we found they also still had the original information on their Cemeteries, Churchyards and Crematoria page, which scores just 1.5. That was also the page found by our user tester, not this new one, however they were not told to look for two pages.
- 18 Gateshead is not included in these statistics. At this stage our research team hadn't found the council's more public facing page in the deaths section, only a statistical page in the information transparency section of their website, which was not deemed to contain information for members

- of the public needing a council funeral. We were directed to the other page by the council when they were provided with an embargoed copy of the report, and it has since been otherwise fully incorporated. Gateshead's statistical page has only been included where it contained any information that impacted our statistics, namely regarding attendance and return of ashes, but it has not been scored or included in the data tables.
- 19 The additional policies we identified from our calls were:
 Yes: Bradford, Brent, Croydon, Dundee, Durham, Ealing, Harrow, Hull, Kingston upon Thames, Lambeth, Leicester, Nottingham, Southwark, Sutton, Tower Hamlets.
 No: East Ayrshire, Havering, Newport and Plymouth.
- 20 One of the councils that implied their attendance policy, by saying there is no service, is Gateshead but this is only given on their statistical page in the information transparency section of the website, not on their more public facing page in the deaths section.
- 21 Three other councils in England also indicated their observance of the deceased person's wishes however as their default is to carry out a burial and this is the only legal requirement in England, they have not been included.
- 22 www.nationalwillregister.co.uk/news/two-fifths-of-uk-adults-not-discussed-instructions-after-death-new-wills-report-finds/
- 23 In 2021, 15 of 40 councils had no information online for a member of the public needing a council funeral. To create as direct a comparison as possible with this year, this figure includes Lambeth which only has statistical information about council funerals on its website. In 2021 we counted it as having some information, but this year we decided not to count it, or other webpages like it.
- 24 www.theguardian.com/society/2024/feb/28/nearly-one-in-10-english-councils-expect-to-go-bust-in-next-year-survey-finds
- 25 www.news.sky.com/story/we-hadn8217t-even-grieved-for-my-mum-properly-families-feel-impact-of-spiralling-funeral-costs-13142765
- 26 In Northern Ireland in 2022-23 the average award was £1,453 - just 44% of the average cost of a 'basic funeral' in Northern Ireland that year, based on the latest available DfC figures.
www.communities-ni.gov.uk/publications/annual-report-social-fund-2022-2023
www.sunlife.co.uk/siteassets/documents/cost-of-dying/sunlife-cost-of-dying-report-2023.pdf/
 In Scotland, in 2023–24 the average award was £1,974 – just 49% of the average cost of a 'basic funeral' in Scotland that year. The portion of the payment for other funeral costs, went up in April 2024 by £79.
www.socialsecurity.gov.scot/reporting/publications/funeral-support-payment-high-level-statistics-to-31-march-2024
www.sunlife.co.uk/siteassets/documents/cost-of-dying/sunlife-cost-of-dying-report-2024.pdf/
- 27 A Freedom of Information request submitted by QSA in 2023 showed that in 2020/21, 26.9% of rejected applications (4,062) were due to the person who died having another relative who was not getting a qualifying benefit. This does not necessarily mean they had the money, nor that they would help even if they could. If the applicant, who had taken responsibility for the funeral costs, had not been in receipt of a benefit themselves this would have been recorded as the rejection reason.
- 28 www.lawcom.gov.uk/project/burial-cremation-and-new-funerary-methods/



Appendix

Definitions used in research

Very easy	One or two clicks from the 'Deaths' or 'Bereavement Services' section of the main council website with a heading or sub-heading that gives some indication of what it is, as many people won't know what a 'public health funeral' is, for example.
Easy	One or two clicks from the 'Deaths' or 'Bereavement Services' section of the main council website, but with a basic heading like 'public health funeral' or 'council funeral', or a helpful heading but with one other thing that makes it harder to find. Or findable by using the council search engine, e.g. for 'funeral', in the top three search results and with a heading or sub-heading that gives an indication of what it is.
OK	Findable by using the council search engine, e.g. for 'funeral', and in the top three search results with a basic heading like 'public health funeral' or 'council funeral'. Or as 'Easy', but with one element that makes it harder to find, e.g. unclear top categories.
Difficult	One or two clicks from the 'Deaths' or 'Bereavement Services' section of the main council website, but exclusionary to some users. E.g. inaccurate header/link text regarding when a council funeral can take place, or pathway solely related to burial/cemeteries. Or findable by using the council search engine for 'funeral' and in the top three search results, but with two elements that make it harder to find.
Very difficult	Findable through the 'Deaths' section of the main council website, but exclusionary (see 'Difficult') and with one other obstructive element or more clicks away. Not reasonably findable by using the council search engine, e.g. for 'funeral', due to its positioning or description. Some information about, or reference to the existence of, council funerals may sit on another website run by a particular part of the council e.g. cemeteries or adult social care. Possibly only found by doing a search on a web search engine.

Finding a webpage by using the search function was given less weight because the results and their order are not necessarily fixed.

Scoring

Where some information was held online about council funerals, we scored each council's webpage(s) out of a total of 13. Please note that this score only reflects the particular information that we assessed.

All started with 11 and then got marks taken away for the webpage being harder to find, for not providing information, giving inaccurate information, imposing restrictions on core aspects like the return of ashes or for using negative language. Councils can also score extra marks (up to the maximum of 13) for the webpage being easier to find.

Scoring system for councils with information online

All councils start with 11 and then get marks taken away for various things. They can also score extra marks (up to the maximum of 13) for the webpage being easier to find.

Category	Default	Scoring
Any information online?	1	Content is clearly not for people who need a council funeral = -1 (e.g. Only Freedom of Information requests, statistics etc)
How easy was it to find? (see definitions on p.39)*	1 (= OK)	Very easy = +2 Easy = +1 Difficult = -1 Very difficult = -2
Inaccurate or misleading information about...	0	Circumstances in which a council must carry out a funeral [†] = -2 How a council funeral can be accessed (e.g. public can't self-refer) = -2 Legal duty regarding deceased's wishes for burial/cremation [‡] = -1 Councils' ability to recover costs from estate only [§] = -1 Requirement to revoke the will = -0.5 Unclear text suggesting hospitals/care homes have a responsibility to carry out a funeral = -0.5
Does it say if burial or cremation is the default?	1	Not specified = -1 Only implied -0.5
Any information given regarding the type of grave?	1	Not specified = -1 Not explained what public/shared/common grave is = -0.5 OR Grave type not mentioned, but says it's (un)marked = -0.5
Legal duty indicated regarding the deceased's burial/cremation wishes?	1	Not specified, inaccurate or so unclear it's as if absent [‡] = -1 Only implied = -0.5 OR Restricted circumstances = -0.5 (e.g. written wishes required or religious reasons only)
Any information about what is provided for the funeral?	1	Not specified or only what is not provided = -1 Limited information = -0.5

Does it state whether people can attend?	1	Not specified = -1 Policy only implied = -0.5
Does it state whether the ashes can be claimed?	1	Not specified, or clearly not allowed ever = -1 Policy only implied = -0.5 OR Restricted circumstances = -0.5 (e.g. only in 'exceptional circumstances' or with 'specific instructions in the deceased's possessions or will')
Does it state the council's ability to reclaim costs from the deceased's estate?	1	Not specified or inaccurate [§] = -1 Limited info = 0.5 (i.e. no explanation of what the 'estate' might mean/include or only mentioned in relation to certain cases)
Contact details provided?	2	None, or so restricted (e.g. due to context and positioning) that it is as if there are none = -2 Email only, or switchboard number with department name only = -1 Restricted circumstances = -0.5 (e.g. only given in the context of finding out if they are holding a council funeral for someone you know, as opposed to asking for one)
Negative language or tone	0	Per piece = -1 Up to a maximum of -2 for the repeated use of the same word or phrase (e.g. 'basic', 'pauper's funeral', 'dispose'/'disposal')

*The length of time it took our user testers to find the page does not influence this score as we didn't carry out that exercise during our 2021 research and we wanted to be able to make direct comparisons with the 2021 results.

†If a council gets a lower findability score solely because of inaccurate text in the link used to access the information (e.g. difficult/very difficult), the scoring in this category is adjusted to ensure a maximum loss of two points. However, if the body of the text also contains an inaccuracy on this issue then it loses a third point for reinforcement of the incorrect information.

‡§Councils lose one point in each category, bringing them in line with inaccuracies on when a council funeral can take place and who can refer. It is worse to provide inaccurate information than it is to provide no information at all.

Who is leading the way on online transparency for council funerals?

	Council	Score	Time to find page (min:sec)
	Hounslow, The London Borough of (Funeral Policy)*	12.5	Not found [†]
	Hackney, The London Borough of	10.5	00:22
	Wandsworth, The London Borough of	10.5	00:05
	Bromley, The London Borough of	10	00:35
	Islington, The London Borough of	10	01:27
	Lewisham, The London Borough of	10	02:03
	Copeland Borough [‡]	9.5	00:35
	Wolverhampton, City of	9.5	00:16
	Sutton, The London Borough of	9	00:43
	Richmond upon Thames, The London Borough of	8.5	01:20
	Southampton City	8.5	02:09
	Waltham Forest, The London Borough of	8.5	00:48
	Rotherham Metropolitan Borough	8	00:53
	Westminster, The City of	8	00:24
	Birmingham City	7.5	00:58
	Brighton and Hove City [§]	7.5	Not found
	Leeds City	7.5	00:30
	Oldham	7.5	00:24
	Cornwall	7	01:12
	Kingston upon Thames, The Royal Borough of (Welfare and public health funerals)*	7	00:20
	North Ayrshire	7	02:22
	Sandwell Metropolitan Borough [§]	7	00:10
	Bournemouth, Christchurch and Poole	6.5	00:20
	Sefton	6.5	Not found
	Medway	6	00:52
	Nottingham City	6	02:19
	Plymouth City [§]	6	00:29
	Coventry City	5.5	00:39
	Dundee City	5.5	01:40
	Kingston upon Thames, The Royal Borough of (Funerals arranged by the council)*	5.5	Not found [†]

Council	Score	Time to find page (min:sec)
Newham, The London Borough of	5.5	00:29
Camden, The London Borough of	5	00:48
Doncaster, City of	5	02:00
Dudley Metropolitan Borough (Public health funerals)*	5	03:44 (found second)
Fife	5	01:53
Hammersmith & Fulham, The London Borough of	5	03:07
Kensington and Chelsea, The Royal Borough of	5	Not found
Liverpool City	5	00:42
Manchester City (Public health funerals)*	5	Page did not exist at time of user testing
Allerdale Borough‡	4.5	Not found
Derby City	4.5	Not found
Glasgow City	4.5	01:13
Northumberland County	4.5	02:21
Durham County	4	00:09
Greenwich, The Royal Borough of (Death of person with no finances)*	4	00:25 (found first)
Manchester City (Help if there's no-one to make funeral arrangements)*	4	00:37
Barnsley Metropolitan Borough	3.5	00:19
Brent, The London Borough of	3.5	00:51
Hull City	3.5	Not found
Somerset	3.5	03:36
Barnet, The London Borough of	3	01:07
Buckinghamshire	3	00:11
Rochdale Borough (Municipal funerals)*	3	02:10 (found second)
West Northamptonshire	3	00:18
Bolton	2.5	00:38
Gateshead	2.5	Page not included in the test ^o
Greenwich, The Royal Borough of (Public health funerals)*	2.5	00:35 (found second)
Renfrewshire	2.5	00:35
Carlisle City‡	2	00:47
Newcastle City	2	Not found
Newport City	2	02:00
North Northamptonshire	2	00:20

Council	Score	Time to find page (min:sec)
Hounslow, The London Borough of (Public health funerals in 'Cemeteries, churchyards and crematoria')*	1.5	01:25
Merton, The London Borough of	1.5	00:57
Wiltshire	1.5	00:18
Cheshire West and Chester ^A	0.5	01:09
Enfield, The London Borough of ⁵	0.5	00:36
North Lanarkshire	0.5	00:45
North Yorkshire	0	00:34
Rochdale Borough (Public health funeral policy)*	0	01:03 (found first)
Southwark, The London Borough of	-1.5	01:51
Dudley Metropolitan Borough (Municipal funerals)*	-2	03:24 (found first)
Barking & Dagenham, The London Borough of	No information	
Bexley, The London Borough of	No information	
Belfast City	No information	
Bradford, The City of	No information	
Bristol, City of	No information	
Cardiff	No information	
Causeway Coast and Glens Borough	No information	
Croydon, The London Borough of	No information	
Ealing, The London Borough of	No information	
East Ayrshire	No information	
Edinburgh, City of ^l	No information	
Haringey, The London Borough of	No information	
Harrow, The London Borough of	No information	
Havering, The London Borough of	No information	
Highland, The	No information	
Hillingdon, The London Borough of	No information	
Kirklees	No information	
Knowsley	No information	
Lambeth, The London Borough of [#]	No information	
Leicester City	No information	
Middlesbrough	No information	
Redbridge, The London Borough of	No information	
Rhondda Cynon Taf County Borough	No information	
Salford City	No information	

Council	
Sheffield City	No information
South Lanarkshire	No information
Stockport Metropolitan Borough	No information
Stoke-on-Trent City	No information
Sunderland City	No information
Swansea	No information
Tameside Metropolitan Borough	No information
Tower Hamlets, The London Borough of	No information
Wakefield	No information
Walsall	No information
Wigan	No information
Wirral	No information

*Councils that have a page title in brackets had two pages, or sets of information, online. Where this is the case, it is also noted which page was ‘found first’ by the user tester and which was ‘found second’.

†The London Borough of Hounslow and the Royal Borough of Kingston upon Thames had two pages. In both cases, the page the user tester found was their older, lower scoring page, however the user tester was not told there were two pages and so did not continue looking.

‡Allerdale Borough, Carlisle City and Copeland Borough councils joined together to become Cumberland Council in April 2023, but the process of bringing all the websites and services together has not yet been completed. As Cumberland Council did not have any information on its website about council funerals, but the original three councils did, we have based our assessment on these.

§The score for these councils has changed after our engagement with them following our research. Brighton and Hove City (10.5), London Borough of Enfield (7), Plymouth City (13) and Sandwell Metropolitan Borough (8.5). See pages 29-32 for more details..

||The Royal Borough of Kensington and Chelsea Council had their information on an external website called People First. Our user tester did find the information when searching within this website, as opposed to the main council website. However, the council lost two points for the information being Very Difficult to find. We acknowledge that we do not know if the People First website is well-known to residents and if they would automatically look there for help. However, it is aimed at a specific group: ‘the older adult population, people living with disabilities of whatever kind, and those who look after others’.

◇At this stage our research team hadn’t found Gateshead's more public facing page on council funerals, only a statistical page in the information transparency section of the website.

▲On providing Cheshire West and Chester with an embargoed copy of the report we were informed that the webpage had a prominent link to a ‘Public health funeral protocol’ document containing the required information. We have been unable to verify when this document and information was added so it has not been included in the report analysis. They also advised they had updated the webpage. We have re-scored all the information and their score has increased from 0.5 to 11.

†City of Edinburgh Council created their page too late on in our report writing for it to be included. However, we have scored it at 4.5.

#The London Borough of Lambeth had a page with statistical information about the council funerals they carry out, but no information deemed to be for people who might need one. In 2021 it was counted as having some information online, but this year we decided not to count it, or other webpages like it.

Council webpages we surveyed by five key areas

Council	Legal duty indicated re. deceased's burial/cremation wishes?*	Information on funeral content?	Allowed to attend?	Ashes returned?	Contact details
Allerdale Borough [†]	-	-	-	-	Phone & email
Barnet, The London Borough of	-	-	-	-	-
Barnsley Metropolitan Borough	Narrow criteria - religious beliefs unless grave exists	Only what isn't provided	-	-	Email only
Birmingham City	Y	Limited info	Y	Y	Phone & email
Bolton	-	-	-	-	Email only
Bournemouth, Christchurch and Poole	Implied but unclear	Y	N	Y	Email only
Brent, The London Borough of	Narrow criteria - written wishes unless religious	Only what isn't provided	-	Y	Email only
Brighton and Hove City [‡]	-	Limited info	Y	Unclear	Phone & email
Bromley, The London Borough of	Y	Y	Y	-	Phone
Buckinghamshire	Unclear - 'considered' if views known	Limited info	-	-	Email only - v. restricted as if not present [§]
Camden, The London Borough of	Implied but unclear	Y	Y	-	Phone
Carlisle City [†]	-	-	-	-	S/B with department name
Cheshire West and Chester	-	-	-	-	Phone & email - restricted

Council	Legal duty indicated re. deceased's burial/cremation wishes?	Information on funeral content?	Allowed to attend?	Ashes returned?	Contact details
Copeland Borough [†]	Narrow criteria - religious beliefs	Y	-	Y	Phone & email
Cornwall	Y	Y	Y - implied ^o	N	Phone & email
Coventry City	Implied, narrow criteria - cultural & religious traditions	Y	N	-	Phone & email
Derby City	-	Only what isn't provided	Y - implied	Y - small fee	Phone & email
Doncaster, City of	Y	-	-	-	-
Dudley Metropolitan Borough (Municipal funerals)	Only if grave exists	Only what isn't provided	-	-	-
Dudley Metropolitan Borough (Public health funerals)	Y	Y	Y	Y - implied	Phone & email
Dundee City	-	-	-	-	Phone & email
Durham County	Y	Limited info	-	-	Phone & email
Enfield, The London Borough of [‡]	-	-	-	-	-
Fife	Y	Limited info	-	-	Phone & email
Gateshead [^]	-	-	-	-	Phone & email
Glasgow City	Narrow criteria - specific objection to cremation	Only what isn't provided	N - implied	-	Phone & email

Council	Legal duty indicated re. deceased's burial/cremation wishes?	Information on funeral content?	Allowed to attend?	Ashes returned?	Contact details
Greenwich, The Royal Borough of (Death of person with no finances)	-	No details but service the same as for a 'normal funeral'	Y - implied	-	Phone
Greenwich, The Royal Borough of (Public health funerals)	-	-	-	-	Phone & email
Hackney, The London Borough of	Y	Y	Y	Y - no fee	Phone & email
Hammersmith & Fulham, The London Borough of	Narrow criteria implied - religious or ethnic beliefs unless grave exists	-	Y - implied	Restricted	Phone & email
Hounslow, The London Borough of (Funeral Policy)	Y	Y	Y	Y	Email only
Hounslow, The London Borough of (Public health funerals)	-	-	-	-	Phone
Hull City	-	Limited info	Y - implied	Y	Phone & email
Islington, The London Borough of	Y	Y	Y	Y - no fee	Email only
Kensington and Chelsea, The Royal Borough of	Y	-	-	-	Phone & email
Kingston upon Thames, The Royal Borough of (Funerals arranged by the council)	Y	Y	Y - implied	Restricted	-

Council	Legal duty indicated re. deceased's burial/cremation wishes?	Information on funeral content?	Allowed to attend?	Ashes returned?	Contact details
Kingston upon Thames, The Royal Borough of (Welfare and public health funerals)	Y	Y	Y - implied	Restricted	-
Leeds City	Narrow criteria - religious beliefs or signed, written wishes	Y	-	-	Email only
Lewisham, The London Borough of	Y	Y	Y	Y	Email only (S/B but no department name)
Liverpool City	Y	Limited info	Y - implied	Y	Contact form only
Manchester City (Help if there's no-one to make funeral arrangements)	Y	-	Y	Y	Phone & email
Manchester City (Public health funerals)	Y	-	Y	Y	Email only
Medway	Unclear - 'usually' take into account known views	Limited info	Y - implied	Restricted	-
Merton, The London Borough of	-	-	-	-	Phone & email
Newcastle City	Y	Limited info	-	-	S/B with broad department name
Newham, The London Borough of	Implied but unclear	-	Y	Restricted	-

Council	Legal duty indicated re. deceased's burial/cremation wishes?	Information on funeral content?	Allowed to attend?	Ashes returned?	Contact details
Newport City	-	-	-	-	Phone (S/B with role name)
North Ayrshire	-	-	Y but must ask for details	If agreed beforehand	Phone & email
North Lanarkshire	-	-	-	-	Phone
North Northamptonshire	-	-	-	-	-
Northumberland County	Y	-	-	-	-
North Yorkshire	-	-	-	-	-
Nottingham City ¹	Y	-	Y - implied	Restricted	Phone & email - restricted
Oldham	Y	Limited info	Y	-	-
Plymouth City [‡]	-	-	-	-	Phone & email
Renfrewshire	-	-	-	-	Phone & email
Richmond upon Thames, The London Borough of	Y	Y	Y	Restricted	Phone & email
Rochdale Borough (Public health funeral policy)	Y	Y	Y	Scattered at crem.	-
Rochdale Borough (Municipal funerals)	-	-	-	-	Phone & email
Rotherham Metropolitan Borough	Narrow criteria - specific instructions found	-	Y	-	Phone & email

Council	Legal duty indicated re. deceased's burial/cremation wishes?	Information on funeral content?	Allowed to attend?	Ashes returned?	Contact details
Sandwell Metropolitan Borough†	Narrow criteria - if cost not unreasonable	Y	Y	Scattered at crem.	Team given as B/S, phone easily findable
Sefton	Narrow criteria - cultural or religious beliefs, or written wishes	Y	Y	Y	S/B with department indicated
Somerset	-	Limited info	N	Y	-
Southampton City	Y	Y	Y	Scattered at crem.	-
Southwark, The London Borough of	-	-	-	-	-
Sutton, The London Borough of	Narrow criteria - religion forbidding cremation or written evidence	Only what isn't provided	Y	Y	Phone (S/B with role name) & email
Waltham Forest, The London Borough of	Narrow criteria - religious or cultural reasons	Y	Y	Y - no fee	Email only
Wandsworth, The London Borough of	Y	Y	Y	Restricted	Phone & email
West Northamptonshire	Y	-	N	Restricted	-
Westminster, The City of	-	Y	Y	-	Email only
Wiltshire	-	Only what isn't provided	Y	-	-

Council	Legal duty indicated re. deceased's burial/cremation wishes?	Information on funeral content?	Allowed to attend?	Ashes returned?	Contact details
Wolverhampton, City of	Narrow criteria - written instruction	No detail but in line with deceased's known beliefs & wishes	Y	Y	Email & S/B phone

- = not specified

B/S = Bereavement Services

S/B = Switchboard

*In England and Wales, councils 'shall not cause a body to be cremated ... where they have reason to believe that cremation would be contrary to the wishes of the deceased'. In Scotland, councils 'must ... have regard to any wishes that the person expressed as to means of disposal of the person's remains'.

†Allerdale Borough, Carlisle City and Copeland Borough councils joined together to become Cumberland Council in April 2023, but the process of bringing all the websites and services together has not yet been completed. As Cumberland Council did not have any information on its website about council funerals, but the original three councils did, we have based our assessment on these.

‡The content of these councils' pages has changed since our engagement with them following our research, this includes Sandwell removing text about not carrying out a burial 'if the cost is deemed to be unreasonable'. See pages 29-32 for more details.

§The use of 'restricted' refers to the presentation of the contact details e.g. they are hard to find, or they are given for a specific purpose other than needing a council funeral, such as enquiring about statistics or crematorium and cemetery services, or to find out if a council funeral has been arranged.

¶On providing Cheshire West and Chester with an embargoed copy of the report we were informed that the webpage had a prominent link to a 'Public health funeral protocol' document containing the required information. We have been unable to verify when this document and information was added so it has not been included in the report analysis or data tables. They also advised they had updated the webpage.

¶The use of 'implied' for attendance generally means that the information either referenced the existence of a service or said that there isn't one.

¶Gateshead's statistical page in the information transparency section of the website implied that attendance is not allowed, as it said there is no service, and stated that ashes are scattered at the crematorium.

¶On being provided with an embargoed copy of the report, Nottingham City Council contacted us to confirm that people are allowed to attend and to advise us that 'there are no restrictions on the collection of ashes for family members'. They committed to updating their webpage 'to reflect the service' they provide.

Councils we researched through phone calls

Council	No. of calls to reach end department/ person	Contact made with right department?	Council funeral possible?	Burial possible?
Barking & Dagenham, The London Borough of	8 inc. 2 wrong departments	Y	No response	N/A
Barnet, The London Borough of	N/A	N	N - council doesn't do this	N/A
Bexley, The London Borough of	5	Y	N - coroner referral only	Info not obtained
Birmingham City	5 inc. 1 wrong department. Ended up using number on the council funeral page.	Y	Y	Y - preference sought
Bradford, The City of	2	Y	Y	Y - after pushing
Brent, The London Borough of	4 inc. 1 wrong department. Ended up using email on the council funeral page.	Y	Y	Y - preference sought
Bromley, The London Borough of	8 & no call back from the number on the council funeral page.	Y	Y	Y - preference sought
Buckinghamshire	N/A	N	N - council doesn't do this	N/A
Camden, The London Borough of	5	Y	Only via professional referral (e.g. GP)	Y - preference sought
Cardiff	1	Y	Y	Y
Causeway Coast and Glens Borough	N/A	Unclear	N - next of kin exists	N/A
Cornwall	1 + email	Y	Y	Info not obtained
Coventry City	1	Y	Y	Only cremation mentioned

Council	No. of calls to reach end department/ person	Contact made with right department?	Council funeral possible?	Burial possible?
Croydon, The London Borough of	2 plus 2 chases & 3 months passed before we chased. Ended up finding B/S number online.	Y	Y	Y - preference sought
Dundee City	1	Y	Y	Y
Durham County	1 + email	Y	Y	Y - preference sought
Ealing, The London Borough of	3 inc. 1 wrong department	Y	Y	Info not obtained
East Ayrshire	3 inc. 1 wrong department	Y	Y	Maybe
Edinburgh, City of*	3 inc. 2 wrong departments	Y	N - next of kin exists	N/A
Enfield, The London Borough of*	2 inc. 1 wrong department	Y	N - next of kin exists	N/A
Glasgow City	4 inc. 1 wrong department. Ended up using number on the council funeral page.	Y	City morgue referrals only	Narrow criteria - faith reason
Hackney, The London Borough of	1	Y	Y	Y - when requested
Harrow, The London Borough of	8 inc. 2 wrong departments. No general S/B so searched online for possible department numbers.	Y	Y	Narrow criteria - written wishes or faith reasons
Havering, The London Borough of	4 inc. 3 wrong departments	Y	Y	Narrow criteria - written wishes
Highland, The	N/A	U/k - call not returned	No call back but initial response was only if no next of kin	N/A

Council	No. of calls to reach end department/ person	Contact made with right department?	Council funeral possible?	Burial possible?
Hillingdon, The London Borough of	4 inc. 1 wrong department	Y	No call back but initial response from S/B was no help from council	N/A
Hull City	2 - ended up using number on the council funeral page.	Y	Y	Staff member unsure
Islington, The London Borough of	3 + email & a chase	Y	No response & still no number provided two weeks after we emailed	N/A
Kingston upon Thames, The Royal Borough of	2 inc. 1 wrong department	Y	Y	Y - preference sought
Lambeth, The London Borough of	1 + email	Y	Y	Info not obtained
Leicester City	2 inc. 1 wrong department	Y	Y	Y - when requested
Lewisham, The London Borough of*	8 inc. 3 wrong departments	Y	N - next of kin exists	N/A
Liverpool City	N/A	N	N - council doesn't do this	N/A
Manchester City	1	Y	Y	Y - preference sought
Newham, The London Borough of	N/A	N	N - council doesn't do this	N/A
Newport City	8 inc. 1 wrong department. Ended up using website to find person to ask for.	Y	Y	Y
North Ayrshire	1 + email & a chase	Y	Y	Only if grave exists

Council	No. of calls to reach end department/ person	Contact made with right department?	Council funeral possible?	Burial possible?
Nottingham City	1	Y	Y	Y - preference sought
Plymouth City*	5 inc. 2 wrong departments - number on the council funeral page was a departmental automated S/B with no clear option.	Y	Y	N
Redbridge, The London Borough of	3	Y	Y	Info not obtained
Rhondda Cynon Taf County Borough	3	Y	Y	Info not obtained
Richmond upon Thames, The London Borough of	1	Y	Y	Y
Rochdale Borough	1	Y	Y	Burial only
Rotherham Metropolitan Borough	4 inc. 1 chase & 2 wrong departments	Y	Y	Narrow criteria - written wishes
Sandwell Metropolitan Borough	1	Y	Y	Y
Sheffield City	6 + a chase. At least 1 wrong department	U/k - call not returned	No response	N/A
Somerset	1	Y	Y	Narrow criteria - written wishes or religious reasons
Southwark, The London Borough of	3 inc. 1 wrong department to point of referral	N - point of referral reached	Unable to confirm within exercise	N/A

Council	No. of calls to reach end department/ person	Contact made with right department?	Council funeral possible?	Burial possible?
Sunderland City	4 inc. 2 chases	Y	Y	Y - when requested
Sutton, The London Borough of	1	Y	Y	Narrow criteria - written wishes
Tower Hamlets, The London Borough of	5 + email, inc. 3 wrong departments	Y	Y	Maybe
Waltham Forest, The London Borough of	7	Y	Y	Only cremation mentioned
Wandsworth, The London Borough of	6 inc. 3 wrong departments	Y	No response	N/A
Wolverhampton, City of	6 inc. 2 wrong departments. Ended up using email on the council funeral page.	Y	Y	Narrow criteria - written wishes

B/S = Bereavement Services

S/B = Switchboard

U/k = Unknown

*We engaged with City of Edinburgh, London Boroughs of Enfield and Lewisham, and Plymouth City councils following our research. Edinburgh disputed our finding regarding whether a council funeral was a possibility; they felt there had been a misunderstanding on our part. Plymouth advised their burial response indicated a need for refresher training. See pages 29-32 for further details.



Disclaimer

Down to Earth has conducted this research through a mixture of website analysis and phone calls made by volunteers enquiring about a council funeral on behalf of a bereaved friend. We recognise that experiences can differ depending on the timing of website updates, user confidence and the varied temperament or experience level of the local authority staff member at the other end of the line. The purpose of this report is to engender better practice, invite future collaboration and call for governmental change to support ongoing improvements in council funerals. We do not claim to have identified any specific wrongdoing or failure to comply with statutory responsibilities. Rather, we have raised concerns that some practices and policies, and the absence or inaccessibility of detailed, accurate information are all impacting individuals at a time of financial and emotional difficulty.

