

Grief is hard enough: Fix the Funeral Expenses Payment

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Lindesay Mace, Down to Earth co-manager (influencing lead)

07310 134399 | lindesaymace@qsa.org.uk



This parliamentary briefing paper sets out why the eligibility criteria of the Social Fund Funeral Expenses Payment (FEP) does not meet the policy aim of supporting those most in need, explains what changes are needed and estimates how much this might cost.

Recommendations

To reform the FEP eligibility criteria in line with Scotland's Funeral Support Payment to:

- a) allow all those on income-related benefits who need a payment to access one,¹**
- b) make it more cost-effective to digitalize FEP applications, and**
- c) enable the DWP to administer applications more easily and quickly.**

Problem

The FEP is a payment made from the social fund 'to meet funeral expenses of a deceased person'. Described by an Upper Tribunal judge as 'hedged around with onerous conditions',² the eligibility rules are set out in [The Social Fund Maternity and Funeral Expenses \(General\) Regulations 2005](#) (regs. 7 & 8) and when represented in a flowchart an application must go through up to 14 stages.³ The complexity of the criteria is challenging for Department for Work and Pensions (DWP) staff and can result in customers being given inaccurate information. It is also difficult for bereaved people to identify whether they are eligible at an already difficult time, causing people to commit to funeral costs not knowing if they can afford them. The criteria are divorced from the realities of in-work poverty and complex family dynamics, excluding thousands of people in need who are in receipt of income-related benefits, forcing many into debt and negatively impacting their mental health.⁴

Context

[SunLife's Cost of Dying 2025 Report](#) found that in 2024 in England and Wales, 1 in 5 (20%) 'families experienced notable financial concerns when paying for a funeral',⁵ which equates to around 113,724 people in England and Wales.⁶ The proportion of people affected has risen every year for the last five years (up from 12% in 2019). Across the UK, borrowing money featured highest in how this group made up the costs – i.e. using a credit card,

¹ A small number of people would continue to be excluded due to other eligibility criteria in the FSP that was copied from the FEP. For example, the person who died must have been 'ordinarily resident' in the UK.

² [HM v SSWP \(BB\)](#); [MK v SSWP \(BB\)](#) [2023] UKUT 15 (AAC) para. 159.

³ The flowchart is on pages 13 and 14 of this DWP [Advice for Decision Makers guide](#).

⁴ Of people who 'experienced notable financial concerns when paying for a funeral' in 2024, 3 in 4 (75%) reported an impact on their mental health and 60% an impact on their physical health. ([SunLife, Cost of Dying 2025 Report](#)).

⁵ These statistics for England and Wales, as opposed to for the UK (18%), were provided direct to us by SunLife.

⁶ Based on 568,623 deaths registered in England and Wales in 2024 from the [Office for National Statistics](#).

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borrowing money from a friend/relative or from a loan provider (e.g. a bank) – with them borrowing £3,109 on average to cover the costs.⁷ These difficulties meant that a little over a third (34%) of people experiencing notable financial concerns said they had to cut back on essentials like food due to paying for the funeral and almost a quarter (24%) struggled to pay essential bills or rent.

Policy situation

Successive governments have stated that the FEP is targeted to support those most in need, but it is only partially delivering on this aim.

This was recognised by the House of Commons Work and Pensions Committee in 2016 when it recommended that the DWP ‘review whether the bar for assessing other relatives’ relationship with the deceased is set at the right level. The current requirement may be inadvertently excluding some claimants who should receive an award’.⁸

In many cases, it is not just the applicant who must be in receipt of a qualifying benefit (QB), but other family members too. The criteria focus less on why the applicant has taken responsibility for the funeral and more on whether there is anyone else in the family that the DWP thinks could do this. If someone is identified, the applicant’s claim is rejected, regardless of whether that person is able, financially or otherwise, or willing to take responsibility. The assessment does not adequately reflect real-life circumstances.

These ‘family tests’ can result, for example, in an 18-year-old being told to take responsibility. (All stories have been anonymised for privacy reasons).

Caroline's ex-partner died – they had children aged 17 and 18 together. Caroline took responsibility for the funeral given their children were still so young. Despite being in receipt of a QB, her FEP application was rejected because their 18-year-old was in low-paid, part-time work and not on a QB. Caroline scraped together the deposit of £1,400 but was left with a debt of over £2,000. A charity grant covered most of the balance.

While estrangement can lead to someone being disregarded from the assessment, in our experience the threshold for this is too high and focuses too heavily on there simply being some contact, rather than the amount or nature of it.

Kaleigh lived with her dad, Tyrone. The only contact her mum had with her was through birthday and Christmas cards. Yet when Kaleigh died suddenly aged 23, this minimal contact meant the DWP rejected Tyrone's FEP claim as unreasonable, despite him being in receipt of a QB, simply because Kaleigh's mum was not. However the mum couldn't and wouldn't help, so Tyrone was left paying a debt of £3,600 at £300 per month.

⁷ Statistics for the group who had notable financial concerns were provided to us directly by SunLife. Most figures for this group are not available by nation, therefore we have provided UK-wide data.

⁸ House of Commons Work and Pensions Committee, [Support for the bereaved](#), para. 50.

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Although there are some set situations in which a family member will be disregarded from the assessment, some of these are too restrictive. For example, anyone in prison must have been in receipt of a QB immediately before they went into custody.

Maryam was denied the FEP when her dad died. Her dad's son, Hassan, was in prison but the DWP found no record he'd been on a QB immediately beforehand. Maryam was sure he had been, but she couldn't prove it as he'd been in prison for over 20 years. Hassan couldn't afford to take responsibility for the funeral but even if he could, this would have been difficult from prison. Seven months after the funeral, Maryam still owed £5,000.

If the person who died lived with a partner, unless they or their actions were responsible for the death, anyone else's claim is rejected.

Bryan's son, Michael, died suddenly in his 30s. As Michael had a partner, the DWP would not accept an application from Bryan, despite him receiving a QB. Bryan tried to engage with Michael's partner regarding the funeral, but they would not assist with the arrangements or the costs. Bryan and the partner did not get on and Bryan was never allowed in their house. A charity grant made the funeral possible.

Alternatives

An evaluation of the Scottish Government's [Funeral Support Payment](#) (FSP) carried out by Ipsos Mori found that applicants 'tended to have an accurate understanding of whether or not they would be eligible'.⁹ Funeral directors who also had experience of the FEP 'felt the FSP application was simpler and easier to understand'.¹⁰

The FSP recognises far better the need of the applicant and the complexity of family relationships when looking at whether it is considered reasonable for the applicant to take responsibility for the funeral costs.

Funeral Expenses Payment	Funeral Support Payment
If the applicant does not meet the DWP's definition of the partner of the person who died, they must meet a complex set of conditions that allow very little flexibility.	The applicant must either: • be the nearest relative to the person who died, OR • provide information to support why it was reasonable for them to accept responsibility, including why any nearer relatives have not.¹¹

For a full comparison [please view our separate table](#).

The number of FSP awards is estimated to be 40% greater than under the FEP.¹²

⁹ Scottish Government, [Funeral Support Payment: evaluation - qualitative research](#), July 2022. Chapter 2.

¹⁰ Scottish Government *Op.Cit.*, Chapter 3.

¹¹ Social Security Scotland, [Eligibility for Funeral Support Payment](#).

¹² MSP Ben Macpherson, [Written question S6W-06084 response](#), 25 February 2022

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Fiscal implications

If a 40% increase in awards resulted in a 40% increase in the FEP's expenditure, then a rough estimate suggests the policy change could cost:

England and Wales: £18.4m based on 2022/23 net expenditure (£46m)¹³

Northern Ireland: £1.292m based on 2022/23 net expenditure (£3.229m)¹⁴

We note, however, that in 2023/24 the FEP's net expenditure was higher in England and Wales at £52m, making the estimate £20.8m.¹⁵ We have used 2022/23 above as this is the latest social fund data available for Northern Ireland.

The Work and Pensions Committee's 2016 report noted the potential benefit to the department in 'lowering the bar' for 'assessing other relatives' relationship with the deceased' noting that it 'may help to bring down application processing time'.¹⁶

Struggles with funeral costs can leave no mental space to grieve, bringing a higher risk of prolonged grief, which can in turn lead to poorer mental health in the long-term. Analysis from the Centre for Mental Health found that the total cost of mental ill health in England in 2022 was £300 billion.¹⁷ While any impact of the FEP's exclusionary criteria on people's mental health will be small in comparison, it nonetheless could be contributing both to worsening health for some people and, in turn, a cost to the state.

Devolution implications

The fiscal implications above also factor in the costs for implementing the change in Northern Ireland. Although welfare policy is devolved to Northern Ireland, it is funded by the Westminster Government and there is an agreed principle that Northern Ireland's welfare policy will broadly mirror that in place in the rest of the UK.

Who are we?

Quaker Social Action (QSA) is an independent UK charity working with people on low incomes to seek solutions to the issues affecting their lives. Our [Down to Earth](#) project, which has been running for 15 years, is the only charity-run UK-wide funeral costs helpline. We aim to reduce funeral poverty through our frontline support and policy work. QSA is widely recognised as a leading authority on funeral poverty in the UK.

¹³ Department for Work and Pensions (DWP), [Social Fund account 2022 to 2023](#), p.5.

¹⁴ Department for Communities (DfC), [Annual Report on the Social Fund 2022 - 2023](#), Annex 1.

¹⁵ DWP, [Social Fund Account 2023 to 2024](#), p.5.

¹⁶ Work and Pensions Committee *Op.Cit.*

¹⁷ Centre for Mental Health, [The economic and social costs of mental ill health](#), March 2024.