November 2018

**Draft Statutory Guidance on Funeral Costs**

**Scottish Government**

**Theme 1 - Use of language and terminology**

**1 Do you think that the Scottish Government should publish a glossary of terms alongside the guidance on funeral costs?**

Yes

**2 If you answered “yes”, please list any particular terms that you think this glossary should include, along with a rough definition of what you understand the term to mean.**

• Burial – A ceremony where the deceased is buried in the ground.

• Burial Authority – A person who has responsibility for the management of a burial ground. (In line with the Burial and Cremation (Scotland) Act 2016 definition)

• Burial Lair – The final resting place of a deceased person.

• Crematorium – A building that is fitted with equipment for the carrying out of cremations, and includes land (other than a burial ground) pertaining to such a building. (In line with Burial and Cremation (Scotland) Act 2016 definition)

• Cremation – The burning of human remains, including the grinding of burnt remains (In line with Burial and Cremation (Scotland) Act 2016 definition)

• Direct Burial – This is when the deceased is buried without a ceremony such as a funeral, and no one is present at the burial.

• Direct Cremation – This is when the deceased is cremated without a ceremony such as funeral, and no one is present at the crematorium.

• Embalming – The preservation of a body by treating them with chemicals.

• Funeral Director – A service which provides practical support and guidance to help organise a funeral, often liaising with third parties.

• Hearse – A vehicle designed to transport the deceased.

• Mercury abatement Fee – Fee associated with crematoriums efforts to eliminate mercury emissions in order to have a zero emissions rate.

**Theme 2 - Display of pricing information**

**3 Do you think that the guidance should include measures which encourage private cemeteries and crematoriums and funeral directors with a website to display their pricing information online?**

Yes

**4 Please explain your answer.**

**Please explain your answer.:**

Age Scotland believes that greater transparency is needed regarding funeral costs, and we firmly believe that the Scottish Government has an invaluable opportunity to encourage this through the Statutory Guidance on Funeral Costs. This information should be presented clearly and using simple language, and should be accessible for people living with dementia – and have cognitive impairment, or those with disabilities.

It is important, however, that pricing information is not provided online only and should be available in printed form. The Scottish Household Survey found that there is a clear relationship between age and internet use, with only one per cent of adults aged 16 to 24 reporting not using the internet, compared to 67% of those aged 75 and over.[1]

People should be able to request pricing information in different formats, including over the phone, easy read, braille, audio, and large print. By providing pricing information in different formats it will ensure that they accessible to all, and will enable people to make an informed decision.

**Theme 3 - Transparency of cremation charges**

**5 In order for crematoriums to display their prices in a consistent manner, the Scottish Government proposes that all crematoriums should base their standard cremation service charge on a common set of components.**

Yes

**Theme 4 – Definition of a simple funeral**

**7 To help consumers make comparisons between funeral directors, we have proposed a standard definition for a simple funeral. This is set out in paragraph 9 of the draft guidance for funeral directors and also in the drop-down box above. Do you think that the simple funeral service definition set out in the draft guidance captures all of the necessary elements?**

Yes

**Theme 5 – Transparency of pricing at the point of sale**

**9 Do you think that the guidance for funeral directors should include a measure suggesting that funeral directors should describe their processes for care of the deceased to help consumers understand costs associated with this?**

Yes

**10 Please explain your answer.**

**If you answered “no”, please explain your answer.:**

Age Scotland welcomes any measure to make the work of funeral directors more transparent and believe that by providing information on the work that Funeral Directors carry out will help to deliver this.

**Theme 6 - Burial or cremation without using the services of a funeral director**

**11 Do you think the guidance should include a provision encouraging burial and cremation authorities to make reasonable efforts to accommodate the wishes of a person that does not want to use a funeral director?**

Yes

**12 Please explain your answer.:**

People should be able to plan funerals in a way that best suits their needs and wishes, including those who do not wish to use a funeral director, especially those who would struggle to pay for the cost of a funeral and the associated fees such as a funeral director.

Age Scotland, therefore, believes that guidance should include a provision for making reasonable efforts to accommodate the wishes of a person that does not want to use a funeral director.

**Theme 7 – Understanding local authority charges**

**13 Paragraphs 3 and 4 of the draft guidance for local authorities suggest that local authorities should consult the public when developing charging proposals and explain the reasons for any proposed changes to charges.**

Yes

**14 Please explain your answer.**

Age Scotland welcomes the inclusion in the draft guidance for council’s to consult with the public their charge setting process.

Transparency is key when developing charging proposals, and local authorities should ensure that their consultation with the public goes beyond a tick box exercise, and strives to embody the principles of co-production when producing, or changing, the charge setting process.

**15 Paragraph 5 of the draft guidance for local authorities suggests that local authorities should publish information from their Local Financial Returns annually on their websites, showing income generated and expenditure incurred through the provision of burial and cremation services.**

Yes

**16 Please explain your answer.**

This is certainly a measure that could help to increase public understanding of the costs associated with local authorities’ provision of these services but must not be relied upon as the only method of increasing understanding. As we have answered previously, any engagement with the public must not be digital by default, and local authorities should ensure they can provide information by other methods in an accessible way.

**Theme 8 – Local authority measures to reduce funeral poverty**

**17 Do you think the guidance should encourage local authorities to link burial and cremation charge setting to broader strategies and duties aimed at reducing poverty?**

Yes

**18 Please explain your answer.**

We have heard from our Freephone helpline, which provides information, friendship, and advice to older people, of instances where older people, and their families have struggled to meet the cost of a funeral. Age Scotland would, therefore, welcome local authorities linking burial and cremation charge setting to broader strategies and duties aimed at reducing poverty.

Research from Citizen Advice Scotland has found that the average total cost for a basic funeral for a cremation is £2,610 and £3,240 for a burial. There is also a massive disparity in funeral costs for burials and cremations across the country, with some people facing financial hardship on the basis of where they live. The average cost for a funeral in East Dunbartonshire, for example, costs four times more than holding a funeral in East Renfrewshire.

Following on from the Scottish Government’s Action on funeral poverty, it is right for councils to also recognise this as an issue which they can help to address in their local community.

**19 Do you think that local authorities should be encouraged to take actions to support individuals who are struggling with the costs of a funeral?**

Yes

**20 Please explain your answer.**

In our evidence to the Social Security Committee regarding the draft regulations on the newly devolved Funeral Expense Payment, Age Scotland highlighted the issue that it is likely there will be occasions where the spouse of the deceased person is living in a care home, and has a low income, is supported mainly by public funds, but has no entitlement to Government financial assistance. We therefore support the proposal to encourage local authorities to take actions to support individuals who are struggling with the costs of a funeral.

Local Authorities and Social Security Scotland’s FEA Advisors also have an invaluable opportunity to act as a point for further support, and should able to signpost people to services such as bereavement charities, and information and advice services such as Age Scotland’s Freephone helpline.

**Want to find out more?**

As Scotland’s national charity supporting people over the age of 50, Age Scotland works to improve older people’s lives and promote their rights and interests. We aim to help people love later life, whatever their circumstances. We want Scotland to be the best place in the world to grow older.

Our Policy, Communications and Campaigns team research, analyse and comment on a wide range of public policy issues affecting older people in Scotland.

Our work is guided by the views and needs of older people themselves.

**Further information**

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