

# Consultation on Flax Bourton Mortuary Charging Byelaw Proposal

19 September to 31 October 2023

## Consultation summary outcome:

- There were 78 responses to the public consultation were received from 45% public, 31% funeral directors (none of which are direct cremation businesses) 10% NHS mortuaries, 6% bereavement organisations, as well as national funeral director associations.
- 69% agree or strongly agree with the proposal for a daily charge and 27% strongly disagree or disagree.
- 48% think that charges should start sooner than April 2025; 35% think its about the right time and 17% think charges should start later.

## Key objections/concern (across all groups):

- The charge will get passed onto families.

## Other key comments:

- There should be flexibility and discretion built in.
- Mortuary processes are a barrier to prompt collection.
- More support is required for DIY funerals.

## Key misunderstandings:

- That the charge will apply before the deceased is formally released.

## Key actions:

- Clarify release process
- Clarify comms to public

## Results:

1. Do you agree or disagree with the proposal for a daily charge for keeping deceased people for more than three days after the coroner's release date at Flax Bourton Mortuary?			
Answer Choices		Response Percent	Response Total
1	Strongly agree	47.44%	37
2	Agree	21.79%	17
3	Neither agree nor disagree	3.85%	3
4	Disagree	6.41%	5
5	Strongly disagree	20.51%	16

**1. Do you agree or disagree with the proposal for a daily charge for keeping deceased people for more than three days after the coroner's release date at Flax Bourton Mortuary?**

answered	78
skipped	0

**2. We propose that the charges would start on 1 April 2025, to give time for funeral businesses to source alternative mortuary space. Please tell us what you think of this of this proposed timescale:**

Answer Choices		Response Percent	Response Total
1	Charges should start sooner	48.00%	36
2	1 April 2025 is about the right timescale	34.67%	26
3	Charges should start later	17.33%	13
		answered	75
		skipped	3

**3. If you are responding on behalf of a funeral business, how do you think the proposed byelaw would affect your business? (Please select all that apply)**

Answer Choices		Response Percent	Response Total
1	I would remove deceased people from Flax Bourton more quickly.	10.53%	4
2	I would obtain more storage instead of using Flax Bourton Mortuary	0.00%	0
3	I would pass on the daily charge for using Flax Bourton to my customers.	15.79%	6
4	I would pay the daily charge and not pass extra costs on to my customers	0.00%	0
5	I would reduce my number of customers	0.00%	0
6	I would need more funeral crews and vehicles	10.53%	4
7	Other (please specify):	63.16%	24
		answered	38
		skipped	40

Already comply

It would make no difference to us, or the average funeral director. We collect within 48 hours. The problem is being caused by national online companies that don't have local storage facilities and use the mortuary for temporally storage.

### 3. If you are responding on behalf of a funeral business, how do you think the proposed byelaw would affect your business? (Please select all that apply)

It would not change our behaviour, but it would mean that companies who do not have their own facilities (many national direct cremation companies for e.g.) would be affected. They should either invest in their own facilities like everyone else does or cease trading as Funeral Services.

We always endeavour to bring the deceased into our care as soon as we have received the release paperwork from the coroner's office. So as long as the 3 days start from the time of the paperwork being issued to ourselves, it will not affect our business in any way.

Where possible we collect within 3 days.

We already provide a 24-hr service, the removal of a deceased into our care is responded within the hour of the first call

We have always collected from Flax Bourton promptly.

None of the above applies to us as we always collect within 3 days. We are normally chasing for release notes.

We always endeavour to collect deceased within this timeframe so this should not affect us a company.

It would make no difference to us, or the average funeral director. We collect within 48 hours. The problem is being caused by national online companies that don't have local storage facilities and use the mortuary for temporally storage.

Where humanly possible we always collect our deceased withing 3 working days, we are fortunate that we have the mortuary facilities at our premises. We are a small funeral directors based in North Somerset with no permanent bearers, ours are all casual staff. It's a shame the larger and direct funeral companies are now ruining it for everyone by using the facilities as their own private mortuary.

Replying on behalf of the National Society of Allied & Independent Funeral Directors - SAIF.  
In good funeral practice, once instructions are received from a client, the funeral director should collect the deceased as soon as possible after the release notice is given.

**Already comply, but would appreciate some flexibility**

We always try and collect as quickly as possible and will communicate if unable some flexibility would be appreciated especially towards the smaller independent companies.

In the main, the proposed bylaw wouldn't affect my business very much. I am a prompt collector and 3 days is a reasonable timescale for me. However, I do feel that the direct cremation business model and the larger companies who take on more work have had a greater impact on the length of time some people are "left" with the coroner, and as a result this feels very much a penalisation of the whole industry including the smaller independent businesses who are the ones least likely to incur these fees. There may well be occasions - where we may find ourselves in this predicament of needing more time. Now we will have a fee added because of the consistent actions of others which hardly feels fair.

**Need more of...**

I would need to add 3 of the above elements. 1. Move people more quickly. 2. Obtain more storage if I can afford to. 3. Need more staff

It would be a combination of increased mortuary capacity and more staff and vehicles would need to be obtained.

**Would like flexibility, would like time to obtain storage, would like lower fee**

I am not local to Bristol but came across this survey and felt I needed to respond. Firstly, I would hope that any Funeral Director coming from a distance would be allowed a period of grace to arrange the necessary transport back to their own premises. Secondly, obtaining more storage can run into hundreds of thousands of pounds, as you will be aware as we naturally use the same suppliers. Not all Funeral Director companies will be in the immediate position to do this, nor would any, I believe, reduce their number of 'customers' by turning away families due to capacity. Following the delays that arose from the Shipman case, families are now choosing to book funerals several weeks away, and I believe this is the major cause of delays, which is affecting all of us, both mortuaries and funeral directors alike. We are all at capacity, in buildings that were built to cope with a much shorter death to funeral date period. I would think that a lower charge per day is acceptable, to stop the national companies using local mortuaries as storage, and I suspect that if the charges remain high, these fees will be passed onto the bereaved in a lot of cases.

### 3. If you are responding on behalf of a funeral business, how do you think the proposed byelaw would affect your business? (Please select all that apply)

#### Mortuary procedures are a barrier

Extending mortuary opening times would assist in the collection. If my bearers come in they start at 9am, not 7am and work to 5pm. I appreciate that larger companies have more staff that start earlier, but even if extended up to 4pm or 4.30pm it would give everyone a little more chance.

When you say PPE, do you mean full on gloves, aprons, booties, masks, visors etc or the standard gloves etc that usually use.

With the requirement to send 2 members of staff, this would cause more costs to the families as we would need to bring people in on overtime to facilitate the 3-day limit. If we were able to come alone then this target is more achievable. We do a 90-mile round trip to Flax and try and tie this in with funerals, when we have the staff available.

The only people this will affect are the grieving families. Bring in the 3-day limit, however let FDs come alone, unless the deceased is large.

The removal time at the mortuary at present is limited. If we are only allowed to remove up until early pm then there would be delays until the following morning. Times need to be extended.

I would suggest keeping the mortuary open later than 14:30pm. I feel this would give funeral directors more opportunity to collect within the proposed timescale. For example, if a funeral director had a service at 12:00 noon they would not be able to collect that day due to the mortuary closing at 14:30pm.

Insisting on 2 persons attending is totally unworkable for some FD's, us included, as this would mean closing our office for approximately 2.5/3 hours, because there are only 2 persons working in the office. We regularly have to collect larger deceased persons, and as owners of the business, this has to be our choice and not yours. There is NO H&S issues for the mortuary staff as they do not have to move the body, we do. If you insist on both of us attending Flax Bourton, this will have a massive impact upon the service we offer to our families. Please reconsider this copycat suggestion.

#### Supportive, but...

I agree that a financial penalty is a great motivator and will stop direct cremation companies taking advantage of public mortuaries and using this to undercut funeral directors - who have more than adequate provisions. Our concern would be the charge being effective from the date the release note is issued, we do not like to remove bodies until we have met with a family and entered into a contract. There is a chance that when we meet with the family either ourselves (The FD) or the family may wish to not proceed with the contract/arrangement. Our local hospital makes a charge 3 days after a contract has been entered into with a family. I appreciated that this is open to being taken advantage of, but funeral directors can't put themselves in the vulnerable position of removing deceased from public mortuaries without having a signed agreement and terms of business with the family/person making arrangements.

#### Just opposed

This is completely unreasonable for funeral directors in Wiltshire especially when the efficiency of Flax is so poor and give us no idea of timescales.

If Flax worked to a timescale relatable to other Coroner provisions, Funeral Directors could plan more efficiently as to when they could pick up deceased, there are more issues with the bureaucracy at Flax that need attention before you focus on punishing funeral directors and their clients. Also, the proposed fines are completely unjustified, Wiltshire coroners implement a late charge of £30 per day, £100 to £200 is completely unreasonable. Provision of PPE is fine, all funeral directors carry on their ambulances anyway. The need for two staff to attend seems unreasonable as well, especially for those that have over an hour's journey each way from Wiltshire. For Funeral directors that use Flax as their storage facility when they don't have their own, that we can see would be a valid reason for charging for storage. I very much hope this doesn't become a standard charge and that the proposal is reconsidered.

#### Other considerations

The only issue I can see is the fact sometimes, we get families ringing us saying the deceased is clear for us to remove however the paperwork hasn't been issued for another 2/3 days.

I believe the 3-day ruling is reasonable for collection of deceased & the decision to charge the next of kin or relatives in order to gain instruction sooner is fair also. The issue may arise for instance where an instructor informs a funeral director 2 days into this period. In this instance and as long as the next of kin have been well informed beforehand by Flax Bourton, we may have to pass this fee on to them if it's

### 3. If you are responding on behalf of a funeral business, how do you think the proposed byelaw would affect your business? (Please select all that apply)

unrealistic for us to collect within 24 hours. We have (on occasion) had instructors refrain from informing us as funeral directors as they feel they have to wait for investigations to be complete before moving forward. I Believe encouragement to instruct while still refraining from booking a funeral date until the investigation is complete would alleviate this matter.

As a repatriation company based in Scotland, we are required to transfer deceased home to Scotland and Ireland for a local funeral. Before we can remove a deceased from the mortuary the death has to be registered and we need to obtain permission from the coroner to remove the deceased out of England. The Act states The body of a deceased person must not be removed out of England or Wales until

- notice has been given to the coroner within whose jurisdiction the body is lying
- four clear days have elapsed after the giving of the notice.

In a case where a Coroner has decided not to hold an inquest they may issue a release notice however before we can make an application to remove from England the relative has to register the death and a copy then sent along with the application. As registration must take place at the Registrar's office following an appointment being made, it may require a relative to travel to the area which in turn may cause delays. Additionally, the coroner can take four days after the notice is given which in itself would cause a charge to be made under this byelaw. To have the death Registered and give notice to the coroner with the appropriate documents can take anything up to a week especially if the coroner clears for collection on Friday and will not deal with our request until the Monday. We cannot dispatch a driver until we receive the coroner's permission which also adds a further day. Although we agree with the principle of the byelaw as we understand the pressure being placed on mortuaries since the growth of direct companies, three days is not long enough when a deceased is being transferred out of England. Our only other option is to instruct a local funeral director to remove and store the deceased until permission has been given which could incur an additional cost to the bereaved anywhere between £500 and £1000. We would ask that the byelaw allows for discretion in the case of a deceased being transferred out of England and the three days applies after the coroner's permission is issued.

### 4. If you are responding as a member of public, bereavement organisation, or other stakeholder, how do you think the proposed byelaw would affect you?

No effect

Not at all.

It would not affect me at all, as far as I know.

Very little - I am next in line to die in my family and have ensured funds are available for disposal of my bodily remains

As a member of the public I would not expect this to affect me. If I was using a funeral director their lack of management of their company should not result in charges being passed onto me. Companies unable to manage their dead would be less appealing to me in my choice of company

As a member of public, I don't think the proposed bylaw would affect me.

No effect, unless charges passed on

Not at all unless the charge is passed on to my estate.

Families will pay more + other considerations

It's inevitable that funeral directors will pass this cost on to bereaved relatives as a way of avoiding the requirement to source their own body storage facilities. This additional cost, which could potentially run into thousands of pounds, would place unacceptable financial burden on bereaved families and this is unacceptable. Funeral directors should be forced to source their own body storage facilities in order that families do not have this additional financial burden.

I would be concerned if funeral directors increased their charges as a consequence. Is there need for more crematorium capacity so that deceased people don't need to be stored for so long, and families would wait shorter time for funeral to take place?

It wouldn't directly but it would provide precedent for other such establishments to also commence charging for the same outlined reasons.

**3. If you are responding on behalf of a funeral business, how do you think the proposed byelaw would affect your business? (Please select all that apply)**

Add more cost to the us as public
These proposed costs will simply be passed to the bereaved family. the funeral directors will not foot the bill for the families delay in process and will increase funeral charges. this in turn will drive the bereaved to use the cheaper, much slower direct to crematorium services. whom I have on good authority, will flatly refuse to pay any charges as the contract is not with the mortuary holding the deceased.
In times of bereavement related distress, and as a person with very limited income, these charges would be disastrous, and would vastly increase the aforementioned issues.
I think that this would put added pressure on the bereaved families. People are struggling to pay for funerals as it is and I feel that this cost would be transferred onto the families from the Funeral Directors.
Funeral Directors, being unregulated would covertly pass on that charge. This is part of the larger issue within the Funeral industry - profiteering of private businesses in death.
Charges will increase for customers
I worry that it will increase funeral costs as these charges will be passed on to the bereaved family. I also worry about the pressure to act to appoint a funeral director once the body is released will increase distress on a family and interfere with the natural grieving process.
This may increase the cost of funerals, or I may be pressured into arranging funerals more quickly.
1. There will be exceptional circumstances where the funeral director cannot pick up the deceased or the family are delayed in appointing a funeral director. 2. The costs will be passed onto the family and increase price of funerals/cremations.
Ultimately it will drive up the cost of the overall funeral to the bereaved families. Dispensation should be considered for a non-direct cremation company who is travelling a distance to collect a deceased. Clear and timely information should be given to the families about council storage fees and the need to instruct a funeral director quickly so as to avoid them. Similarly, funeral directors need timely and accurate details of when the body is released. Ideally, information should be unsolicited, the coroner would provide the funeral director with an email informing them the body is released.
<b>Positive response</b>
Nothing significant (and hopefully no direct involvement for a long time!) but less taxpayer money spent on this will be good
Personally, I don't think it would affect me particularly and it would result in a better use of public resources, to which I contribute paying my taxes.
Improved responsiveness from FD's
I believe the biggest issue here are the direct cremation companies who have no staff in local areas and often rely on the support of local funeral directors. If charging ensures proper care of the deceased, then I am in favour of its introduction.
I feel this is a long overdue, and necessary step towards reducing Mortuary capacity and demands put upon public services by private funeral companies.
It should speed up the funeral process
Carry out a survey of all listed FD's and charge those without their own mortuary facilities after 7 days. Sometimes it can take a few days to receive the necessary instructions and initial payments to formally act, but once gained they should be moving deceased immediately. Therefore, hit them financially with large daily rates and ENFORCE the fines.
There is a possibility it could speed up the process of date of death to date of funeral.
I think that the entire process is too long, and it results in public costs that should be avoided. I believe that funerals in general should be kept quicker and, I'm sorry, but it's relatives' responsibility. If they delay the process, they should be charged. I'm even less considerate for businesses taking advantage of public mortuaries. My final goodbye to a loved one it's up to me. I come from Italy and usually funerals are a matter of very few days, generally 2 or 3 days. Can be a week if investigation is needed.
Brilliant idea

**3. If you are responding on behalf of a funeral business, how do you think the proposed byelaw would affect your business? (Please select all that apply)**

It's about time the NHS grows a pair and starts charging

It is essential staff have the right PPE and the deceased body is physically protected and treated with dignity and respect at all times.

Health & Safety provision is a vital part of infection prevention and control; funeral director employers (and employees) must take more responsibility for their actions and omissions. Formal Regulation of funeral directors services is many years overdue; this would boost public and professional confidence in them and weed out some of the less scrupulous firms.

I think it is a great idea for the byelaw to include health and safety provision for funeral director staff. I have worked at jobs where employers did not want to provide proper safety equipment because it was expensive. This law would protect the workers against miserly employers.

I have no objection to charges being made for people not collecting in a timely manner or if 'low cost' national cremation companies are using hospital mortuaries as storage facilities

As an NHS Mortuary manager, I feel that these are essential provisions that should already be common practice.

I don't think the tax payer should have to fund the cost of storing the deceased any longer than necessary.

I don't think this will affect me personally, but it will, hopefully, encourage funeral directors to remove their deceased in a timely manner. This issue has been going on for years in mortuaries (public and hospital). It has even been known that some funeral directors indicate to families that they have collected their loved on when actually they still remain in a mortuary. Others encourage families to attend the mortuary for a visit/viewing to save them having to do it. Costs for such 'services' are often hidden within the blanket cost of a funeral charged by some unscrupulous directors.

Funerals take far too long in this country, the culture of leaving your loved one in a fridge for weeks is disrespectful. The whole process needs to be much faster and easier with deceased being cremated or buried in days, not weeks. I'm outraged that my taxes are paying to store the deceased on behalf of private businesses. This law is long overdue and should be the rule across everywhere in the UK, not just Bristol.

I strongly agree with the application as this will free up space within the mortuary especially during busy months

I don't think it would affect us (bereavement services) but as a tax payer I don't think direct cremation companies should be using either Flax or hospital mortuaries as a storage facility for free.

The byelaw would have a positive effect on the procedures and capability arrangements for Mass Fatality arrangements and Additional/Excess Deaths arrangements, not just in Bristol but Avon and Somerset and the South West as well.

Flax Bourton Public Mortuary is our Dedicated Disaster Mortuary for Avon and Somerset, and one of two for the South West.

The volume of deceased overstaying, especially during winter pressures, reduces the capacity and emergency contingencies for Dedicated Disaster Mortuaries, which then becomes a Major Incident and a need for National assistance, with emergency spend for additional storage falling back onto the Local Authority - which could be avoided/reduced risk, if collections were made on time.

With the climate emergency and increase in heatwaves and high temperatures, the seasonal pressures will not just be in the Winter months, but the Summer months too.

If the deceased are moved in a more appropriate timeframe, to the Funerals Services who are contracted with their care by the bereaved, it keeps the capacity available within the public mortuary for these arrangements.

Supportive, but...

I would be concerned that the cost would be passed on - indirectly and subtly - to families and those paying the invoices. This isn't fair but also no feasible way of ensuring it didn't become the case.

I would also be concerned that local funeral directors may compromise on standards - albeit outside of BCC's control - and the urgency will be to collect and avoid fees, rather than ensuring a standard of service and provision that families would expect.

**3. If you are responding on behalf of a funeral business, how do you think the proposed byelaw would affect your business? (Please select all that apply)**

One way or another, I think this is right and just market disruption. I would be interested in financial modelling and expectation for income vs. cost recovery.

**DIY funerals**

I am interested in DIY care after death, and DIY funerals.  
 It MUST be possible for members of the public to collect their own deceased from the mortuary themselves, without having to involve a funeral director, or to source complicated training and PPE at a difficult time. Very few people will want to do this each year, so it would be reasonable for the Council to provide PPE and any necessary supervision free of charge.  
 Is it actually possible to arrange a burial or cremation locally within the three days, at Council facilities, without incurring any additional cost, and without having to involve a funeral director? If not, then this should be in place before the new charges are bought in.

DIY funerals are low cost, environmentally friendly, may be more meaningful to loved ones, and interest is growing. It saves the Council a lot of money if people go for DIY options instead of Public Health funerals. As such, it is important to make people aware of the option, and to have as few barriers in the way as possible.  
 It is really important that all stages of the process can be done without using a funeral director at all, because as soon as funeral directors get involved they try to take over, and the costs mount up extremely fast.  
 It is very helpful for DIY funerals to give free storage for a week, because that way volunteers can provide support and guidance at weekends.  
 I worry that putting requirements about PPE etc front and centre may discourage loved ones from collecting their own deceased. Dead bodies are not usually dangerous, even if they died of an infectious disease they are no more (and usually less) of a risk than when they were alive. It would instead be more helpful for people collecting their own loved ones if mortuary staff could provide PPE and guidance tailored to any risks specific to this particular deceased person, and perhaps reassurance that while mortuary protocols may require more PPE, this isn't usually necessary once the deceased is resting at home.  
 Is it possible to get a deceased person buried or cremated in Council facilities in the time frame for avoiding extra charges? There may be specific issues with loved ones not being aware of the process to eg book a burial lair or cremation slot, so it takes them longer than for funeral directors. Mortuary staff should have information about this to hand, and proactively make it available.  
 In general, mortuary staff should proactively inform people that DIY options are safe, legal, and something loved ones can do without a funeral director. Many people don't believe this is possible. It is, it's cheaper, eco-friendly, meaningful, and often a good choice.

Not everyone uses a funeral director. I have previously buried a relative at home, storing the body in the hospital mortuary for a week while we dug a grave on private property and family arrived from abroad, and then collecting the body ourselves.

This was a dignified and beautiful laying of my grandfather to rest and we would have been resentful of pressure to rush into things. To face a charge of up to £800 or have family members miss the burial would have been a horrible goodbye.

We intend to do the same with my grandmother and parents.

I agree with some charges, but they should be after a working week, with a lower charge for low incomes and discretion to waive.

**Just opposed**

With current 3 week wait for autopsy how is this going to work realistically? I've been through this when my dad died 2017, was told by Southmead hospital if body was not collected in 48hrs be charged £100 a day whilst in their mortuary. My dad died on weekend and was not possible to be collected until following Tuesday. We pay £4000+ for a funeral, how can you be so heartless to charge us mortuary costs on top!!!

Three days is too little notice for a bereaved family to make arrangements. Especially if there has been some trauma around the death.

I am a member of the public and I have read your reasons why the need is there and the increase in public funerals, this charge would fall upon those people who pay council tax and taxes, those people who are constantly being squeezed so others who do not pay reap these benefits.  
 Why should funeral directors have to increase their storage facilities and put extra pressure on staff who already do a remarkable job.  
 Will the council promote embalming and purchase deep freeze facilities to keep the public health deceased



### 3. If you are responding on behalf of a funeral business, how do you think the proposed byelaw would affect your business? (Please select all that apply)

<p>longer? If not, why not? This consultation needs to be transparent and put out to the wider public for a better understanding.</p>
<p>Another tax on the dead at a difficult time coping with the loss of a loved one and in a cost-of-living crisis this should even be being considered</p>
<p>Just another Bristol council stealth tax to burden us with</p>
<p>I believe another option must be explored, such as government funding to increase storage for the deceased. I know this seems fairly unlikely for obvious political reasons (lack of funding from a callous government) but is better than charging so extortionately.</p>
<p>Disgraceful suggestion, please have some respect for dead and their families at what is a heart-breaking time in anyone's lives!</p>
<p>This is an excessive charge. £100 to £200 suggests that this is not being used as a 'deterrent' but rather a less than subtle way of getting the public to pay for this service. Funeral Directors quite rightly will not absorb these charges and instead will quite rightly pass such charges onto their clients. It would be far better to have a blanket £82 (the same as the Crem4 charge) on all Coroner related funerals. This can be justified on the basis that everyone who does not use the coroner's service is required to pay this fee anyway for Cremation.</p>
<p><b>Other considerations</b></p>
<p>Could this increase the time deceased are left in NHS hospital mortuaries if funeral directors prioritise removal and storage of those at Flax as we cannot introduce a charge.</p>
<p>There are so many factors as to why a deceased person may not be collected right away once receiving the paperwork</p>
<p>SAIF as the largest funeral director association with over 1,000 members is aware of other statutory mortuary storage facilities that have commenced charging. Experience of other health authorities charge between £50-100 per day as a sensible level and avoid negative publicity for the local authority in this matter.</p>
<p>I would suggest "3 days" be changed to "3 working days". That would be Monday to Friday and exclude Public and Bank Holidays. I would also suggest that the bye law includes a "force majeure" clause that would allow the charges to be suspended if/when we have another pandemic or lockdown which makes it impossible for people to cope with the number of cremations/burials required.</p>
<p>The issue is not timely collection by the funeral directors, it is a lack of regulation or standardisation of funeral services. Their awareness or compliance of Health &amp; Safety is lax, standards are occasionally poor, and equipment is neither new nor maintained effectively. the wearing of PPE shouldn't have to be an independent byelaw, it should be best practice followed by all staff, or service should be refused until compliance is satisfactory. Regulation, however, should not prevent families from making their own decisions or arrangements in terms of DIY style funerals; patient choice and informed consent should still be at the foundation of decisions made.</p>
<p>Some families may not have even appointed a Funeral Director by the Coroners release date. i.e., they may be waiting for a grant from the Council (which takes some time) before appointing a Funeral Director.</p>
<p>I think PPE should be advised but be at the discretion of the family if collecting privately</p>
<p>It would be useful to notify not just the appointed Funeral Director of the release date but also the family instructing the FD so that they are aware of when the FD should be responding and look out for 'extra' costs associated with the process / push the FD to expediate the arrangements.</p>
<p>It would be useful and beneficial to both parties if confirmation that the body is ready to collect is conveyed by email this means there can be no disagreements on when FD's etc were informed</p>
<p>I'd be keen to explore where charging discretion lay and where mitigating circumstances could be in play. At some point, some of the smaller providers could face undue pressure and whilst it shouldn't be a negotiation there will be a balance between those who 'chance it' and those who simply can't fulfil but are otherwise good and honest providers.</p>
<p>Some exceptional circumstances may need consideration too. Another pandemic, for example, or an LRF recognised excess death situation.</p>

**3. If you are responding on behalf of a funeral business, how do you think the proposed byelaw would affect your business? (Please select all that apply)**

Keen for the view of the Chief Coroner here, indeed the NHS too, as this could set a precedent for others to follow.

Note: As a fellow LA with our own storage abilities, we too have a charging schedule but not a byelaw. Our costs are also significantly lower and more in line with NHS costs. This may strike a balance of easing the service pressure of local directors, without being disproportionately high and a fine.

Suggestion: The Council to offer Funeral Services/packages (have an inhouse Funeral Director Service) to aid bereaved families and friends, particularly those impacted by the cost of living and unable to afford current market funeral expenses, not applicable for Gov funds and benefits. A reduced/basic overhead cost funeral comes with the caveat of utilising our less popular Cems and Crems times in Bristol - to again aid the reduction of time spent in storage.

SAIF recommends there are clear guidelines as to what is

1. Three working days.
2. The mode of the release notice: a phone call will not suffice as a trackable method is required, therefore, would an email or active webpage?
3. Staff are at the mortuary, the electric gate is repaired and consider booking process with bandwidth of arrival - departure time.
4. Extend the opening hours of the mortuary Monday to Friday.
5. What happens when there is a shortage of mortuary staff due to illness, how will the charge be re-worked if access is limited?
6. External factors that create funeral director storage problems, eg, a crematorium's cremators are refurbished and cause delays in booking due to limited bookings available.

We will often receive the coroners release note before we have been notified by the families that we are doing the funeral. Therefore, the Funeral Director should only be charged 3 days after the date of release or 3 days after receiving notification from the families. The £100 to £200 charge is excessive and would need to be considerably lower.