SAIF
Code of Practice 2026

Introduction

The National Society of Allied and Independent Funeral Directors (SAIF) has developed a Code of Practice to encourage and assist funeral service providers in delivering the highest standards of service while acting in the best interests of bereaved families. This code also helps families understand the minimum standards they should expect when choosing a funeral director.

SAIF and the National Association of Funeral Directors (NAFD) have agreed to adopt a Code that was developed for the Scottish Government, which became statutory in 2024. This code applies to all funeral directors offering services in Scotland. This agreement establishes a set of minimum common standards across the United Kingdom for all members of both associations. The Code has been shaped by the knowledge and expertise of funeral profession members, including SAIF representatives, and is based on principles of responsible practice. The objective of complying with this Code is to ensure that every person using a SAIF member will have a dignified and respectful funeral, and that bereaved families can have confidence in the high standards of care for the deceased provided by the funeral directors. Furthermore, compliance with the Competition and Markets Authority (CMA)'s Funerals Market Investigation Order 2021, established on June 16, 2021, is also required.

All SAIF members must adhere to additional requirements where those standards exceed those outlined in the common code. An addendum at the end of the document contains these additional requirements and should be read in conjunction with the main code.

To whom does the Code apply?

A 'Funeral Director' means a person whose business consists of, or includes the arrangement and conducting of, funerals for and on behalf of customer(s). (CMA Order June 2021).

A person whose business consists of or includes the arrangement and conducting of funerals as set out at section 31 of the Certification of Death (Scotland) Act 2011 (Scottish Government draft Code of Practice).

It applies to all funeral directors as defined above who are members of SAIF, and it is our expectation that other funeral directors will recognise its value and adopt the requirements as a positive step towards ensuring a quality level of service to all bereaved families throughout the UK.

Engagement of the funeral director and transfer of the deceased

1. It is expected that all funeral directors are transparent about the goods and services they offer. If the funeral director does not offer the goods or services about which a person has enquired or requested, it is expected that the funeral director makes that clear and makes the person aware that those services can be accessed elsewhere. All written and verbal communication must be clear and in plain language, avoiding jargon. The funeral director must act in accordance with the instructions of the client, as far as reasonably practicable. The funeral director must act in accordance with the requirements of this Code.

First contact

2. When the funeral director is contacted in relation to the death of a person initial details must be gathered from the client (or other person who makes contact with the funeral director on behalf of the client or while the person who will be the client is not yet determined). The funeral director at first contact must, whenever practicable, obtain and record the following minimum information:

- The full name, address and telephone number of the person making contact with the funeral director.
- The full name and address of the deceased.
- The date of birth and age of the deceased, if known.
- The current location and address of the deceased, if different to the above address.
- Confirmation that a suitably trained registered healthcare professional has confirmed or verified the death or pronounced life extinct (PLE).

Transfer of the deceased into the funeral director's care

3. In the event that the funeral director has been contacted by someone other than the client, the funeral director must make all reasonable enquiries to establish the identity and contact details of the client at this stage and to establish contact with the client as soon as possible.

4. The funeral director must inform the client that they adhere to the Code and provide the client with a copy or web link if requested.

5. Once the funeral director has been instructed, they must take the deceased into their care at the earliest possible opportunity.

6. Before transferring the deceased into their care, the funeral director must ensure that:

- The equipment to be used is suitable for the transfer of the deceased; taking into account the deceased's body type – and is clean, in good condition and well-maintained.

- The staff involved in the transfer of the deceased are trained to do so.
- The vehicle used to transfer the deceased must be specifically equipped and used for that purpose; and is clean and well-maintained.
- The deceased are treated with care and dignity.
- Consideration is given to any bereaved persons present.

7. At the location from where the deceased is to be collected, the funeral director must:
    - Confirm the identity of the deceased.
    - Obtain signed authorisation from the client or the person the client has nominated to represent them for the transfer of the deceased into their care; or, where the client has yet to be identified, signed authorisation from the person requesting the transfer (e.g. hospital or care home staff).
    - Advise that person in writing (or by e-mail) of the location where the deceased is being transferred to including an address and contact number for the location.
    - At the earliest opportunity inform the client of all locations where the deceased will be cared for (and all addresses of the premises where the deceased will be kept).
    - Make or obtain a record of the deceased's personal effects the funeral director will take into their care and a record of any personal effects which have been returned to the person signing the record at the time of transfer. The funeral director must ensure that this record is checked and signed (on paper or electronically) by the client or the person the client has nominated to represent them, before leaving with the deceased. If the client has yet to be identified or is unavailable at the time of the transfer the personal effects record must be counter-signed by another person such as a member of staff of the hospital mortuary or care home before the funeral director departs with the deceased.
    - Securely attach to the deceased a completed identity tag (e.g. to the wrist).

Care of the deceased and premises used by the funeral director

8. The funeral director should familiarise themselves with the Health and Safety Executive's guidance on managing infection risks when handling the deceased. It covers the safe handling, storage and examination of bodies and pathological specimens in hospitals, mortuaries and post-mortem rooms. It also provides guidance for those involved in funeral services (including embalmers).
9. It is expected that funeral directors clearly and sensitively describe their services for care of the deceased to the client and must keep a record of having done so.
10. It is important that no client is pressured or exploited, and advice should be given to them by experienced and/or trained staff in a clear manner using plain language. The funeral director should always be mindful of the difficult circumstances the client is likely to be experiencing.
11. The client must be told the location(s) where the deceased will be cared for/kept.

12. Where the funeral director is using the services of another provider for any part of the care of the deceased a written Service Level Agreement (SLA) must be in place with that provider. Each SLA must be reviewed regularly and at least once per year. An SLA is not required for singular ad hoc arrangements (e.g. repatriation); in such a case a written agreement is sufficient.
13. Where aspects of care of the deceased are being carried out by a third party the funeral director must clearly and sensitively inform the client which aspects of the care of the deceased these are and keep a record of having done so.
14. All care of the deceased must take place in a location(s) specifically chosen for that purpose and the funeral director must ensure that their care facility or mortuary is fit for purpose. This requires that:
    - the premises are lockable and accessible by authorised persons only.
    - the premises are clean, well-maintained and regularly inspected to ensure high standards of cleanliness.
    - the location of, and access to and from, the care facility or mortuary is suitable for the designated purpose.
    - the funeral director has access to equipment that can accommodate all body types and care services offered by the funeral director and the equipment must be well maintained.
15. The funeral director must carry out regular visual checks of the condition of the deceased and a further check immediately before the coffin is closed or immediately prior to the funeral service if no coffin is being used.
16. The funeral director must retain a comprehensive record of all deceased persons who have been in their care. The record must be sufficiently detailed to record what actions have been carried out in relation to the deceased (e.g. first offices, washing, dressing – where, when and by whom, time of deceased's arrival and departure at funeral director's premises). The record must be stored in an accessible form, in secure conditions and is to be retained for a minimum of 5 years. Where a record contains data about any person who is still living, funeral directors are required to comply with all relevant legislation (e.g. UK General Data Protection Regulation, the Data Protection Act 2018 etc.).

Care practices

17. The funeral director must be able to demonstrate that they have assessed the activities undertaken by every staff member whose role includes duties relating to the care of the deceased. A record of each assessment, the outcome of the assessment and training requirements/training undertaken must be kept by the funeral director and made available to inspectors on request.
18. At all times during their care the dignity of the deceased must be maintained and appropriate shrouds, clothes and/or modesty covers used.

First offices

19. First offices is a process of caring for the deceased to assist with preservation and to make them presentable for viewing.
20. When requested the funeral director must describe their services for first offices in a way that is sensitive to the client to ensure that the client has an understanding of how the deceased will be cared for by the funeral director.
21. Where it is possible to do so first offices must take place in every case unless the client has specifically requested that first offices are not to take place. First offices must be carried out in a manner that maintains the dignity of the deceased, treats them with care (including moving the deceased in ways which avoid damage) and, at a minimum, includes cleaning and washing the body, dressing them, closing the eyes and mouth and arranging the hands.
22. Where first offices have not taken place, the funeral director must keep a record of the reason/s for this.

Embalming

23. Embalming is defined as the preservation of a body from decay through injection of a chemical embalming fluid. The preservative solution (the embalming fluid) replaces the blood as well as treating the body cavity and organs.[1]
24. Embalming is not a requirement for burial or cremation.
25. There is no requirement for the funeral director to offer embalming as a service.
26. The funeral director must provide clear information to the client about embalming in order that the client can make an informed decision about whether or not to instruct embalming.
27. The funeral director must obtain the client's informed and written permission before embalming can take place.
28. It is the responsibility of the funeral director to ensure that those performing embalming on behalf of their business are adequately trained/qualified to do so and are meeting the necessary health and safety requirements.

Emergency invasive procedures

29. An invasive procedure is any procedure that involves the breaking of skin or the opening of bodily cavities.
30. In some circumstances it may be necessary for the funeral director to perform an emergency invasive procedure with the intent of preserving the deceased to a good standard.
31. In the event of these circumstances occurring the funeral director must make reasonable attempts to contact the client and explain the circumstances in advance of performing the procedure.
32. It is the responsibility of the funeral director to ensure that those performing emergency invasive procedures are adequately trained/qualified to do so and are meeting the necessary health and safety requirements.

33. In every case the funeral director must keep an accurate record of the circumstances and the procedure carried out. This record must be made available to inspectors on request.

Refrigeration

34. Refrigeration is a critical element of caring for a deceased person in a dignified, appropriate and respectful manner.

35. The funeral director must have on their premises, or have access to, clean and appropriate refrigeration facilities to store the deceased in their care. Where refrigeration is provided by a third party an SLA must be in place. Each SLA must be reviewed regularly and at least once per year. Where refrigeration is being carried out by a third party the funeral director must clearly and sensitively inform the client of that fact.

36. Refrigeration can be a purpose-built refrigeration unit or temperature controlled cold room. Refrigeration units and cold rooms must be kept between 4 – 7 degrees Celsius.

37. The required refrigeration capacity that a funeral director must have on their premises, or have access to through a SLA, should be sufficient to accommodate persons received into the funeral director's care. A funeral director must review their refrigeration capacity at least once per year.

38. Each deceased person must be stored individually in separate compartments (e.g. a separate rack shelf or drawer) within the unit or cold room.

39. Refrigeration units must be in a locked and secure location. Cold rooms must be locked and in a secure location.

Viewing of the deceased

40. The funeral director must provide clear information to the client about whether they provide viewing of the deceased as standard. This will enable the client to make an informed decision about whether or not they would wish to view the deceased.

41. If viewing is not normally offered as part of a service, for example where the funeral director only offers direct cremation, the funeral director must make it clear to the client, before the client engages their services, that viewing is not included as standard. If the client subsequently requests to view the deceased the funeral director is to take steps to facilitate a viewing where possible, for example by agreement with another funeral director to use their viewing facilities. Any additional costs for facilitating viewing should be made clear to the client before that service is provided, in accordance with the Competition and Markets Authority (CMA) Funeral Markets Investigation Order 2021.

42. Viewing areas must be fit for purpose, private, clean, regularly inspected and well-maintained.

43. Prior to any viewing the funeral director must ensure that the identity of the deceased is checked to ensure that the correct deceased person is shown to the

visitor and that regard is given to requests made by the client such as: make-up application, if the coffin is closed or left open, who can be permitted to view the deceased, etc.

44. The funeral director must ensure that bereaved persons are afforded privacy when viewing the deceased. The funeral director or another trained and competent member of their staff must remain near and 'on hand' to answer any questions or requests.

45. In some circumstances viewing the deceased may not be recommended by the funeral director or some restrictions may have to be put in place such as viewing behind glass.

46. In circumstances where the funeral director advises against viewing entirely the funeral director must provide the client with sensitively worded advice setting out their reasons and make every effort to support the wishes of the client in relation to that advice. The funeral director must keep a record of this advice.

47. Where the funeral director has advised against viewing, but the client does not accept that advice the funeral director must keep a record of this.

Planning the funeral service according to the wishes of the deceased and the bereaved

Deceased and client identification and who can be involved in making arrangements

48. Where the deceased has not set out before dying who should arrange their funeral the funeral director must make the client aware of the next of kin hierarchy set out in the 2016 Act (section 65 for adults, section 66 for children). It is then for the client (or any other individual who wishes to organise the burial or cremation) to determine whether they have the legal right to apply for the burial or cremation.

49. The funeral director must ensure that they and their staff are sufficiently knowledgeable and experienced to explain to the client the goods and services they offer and how the deceased is cared for. This must include an ability to describe, both orally and in writing, the range and location of options for burial and cremation if requested.

50. The funeral director must provide the client with clear and comprehensive descriptions of their goods and services, and how the deceased is cared for by them in the provision of those goods and services.

Estimates and confirmations

51. To enable the client to make an informed decision about the goods and services they would like, funeral directors are already required to comply with the requirements set out in the CMA Funerals Market Investigation Order 2021 and any other relevant legislation.

52. Once the client has made a decision about the goods and services they would like, the funeral director should:

- Provide written or electronic confirmation of the funeral arrangements and a written or electronic itemised estimate of all funeral charges including third party fees (disbursements) where known.
- Provide the client with a written or electronic itemised final account that is comparable with the estimate provided.

53. All changes from estimate to final bill should be clearly described, prior notified and agreed to by the client. The funeral director should be able to account for any changes via an audit trail.

Delivery of the funeral

54. The funeral director is responsible for managing the delivery of the funeral according to the wishes of the client, including:
    - When instructed to do so by the client making bookings, for example of the requested venues, church, celebrant and catering.
    - Ensuring that the client has completed the required statutory forms and that these forms are sent to the appropriate statutory authorities in good time.
    - Keeping and updating records and documentation and ensuring that the client's requests for goods and services are recorded accurately including any changes made to the client's requests or instructions.
    - Ensuring that the deceased is presented in accordance with the wishes and instructions of the client as far as reasonably practicable.
    - Managing donations appropriately, transparently and as requested by the client.
    - All funeral directors must have a written policy in place for managing donations which is understood/known by staff and is readily accessible to the client.
55. The funeral director must keep the following records which are accessible by authorised personnel only:
    - A record of all the funerals provided including requested services, estimates and invoice.
    - A record of the advice given to clients in relation to viewing the deceased and the outcome of the advice.
    - A record of the management and handling of any ashes.

Ashes

56. The funeral director must have a written ashes management policy in place setting out how they will arrange for return or disposal of ashes.
57. The funeral director must ensure the careful and appropriate storage, handling, recording and dignified management of ashes. They must act in accordance with section 54 of the 2016 Act and any regulations made by the Scottish Ministers under section 56 of the 2016 Act.

58. All records relating to ashes must be kept by the funeral director. Where a record contains data about a client who is still living these must be kept in accordance with the UK General Data Protection Regulation and the Data Protection Act 2018.

59. At a minimum an ashes management policy must cover:

- Procedures for:
    - ashes storage in a designated, locked, clean, dry and well-maintained location,
    - ashes and the cremation certificate to be stored together,
    - recording each individual set of ashes,
    - splitting of ashes including the transfer of ashes from one container to another,
    - transfer or release of ashes including procedures for contacting the client and obtaining identification prior to the release of ashes to the client,
    - reporting lost or damaged ashes to appropriate management,
    - reporting lost or damaged ashes to inspectors within 48 hours of discovery,
    - keeping a record of the scattering or interment of ashes if undertaken by the funeral director, and
    - keeping a written audit trail of all actions taken with the ashes.
- The following matters:
    - a clear description of the options available to the client e.g. scattering, interment, retention in an urn.
    - adequate safeguards to ensure ashes cannot be combined with other(s) i.e. only preparing one set of ashes at a time.
    - provision for a change of instruction by the client in respect of ashes.

Complaints

60. The funeral director must have a written complaints procedure. The complaints procedure must be available on the funeral director's website where this exists or must be made available as soon as reasonably practicable in paper or electronic form on request.

61. In the event of a complaint the complaints procedure must be followed and must include:

- Advice for the client on how to make a formal complaint.
- The funeral director's procedures for dealing with a complaint and timescales for response.

- A requirement that any complaint resolution or answer will be provided in writing to the client.

62. In the event of a complaint made against the funeral director the client may:
    - Raise a complaint with the funeral director directly. The funeral director must genuinely attempt to seek a resolution in a reasonable amount of time.
    - Raise a complaint with a trade association to which the funeral director belongs if applicable.
    - Raise a complaint with the inspectors.
63. Where a complaint made to a funeral director relates to a breach of this Code or the care of the deceased the funeral director must inform inspectors of the complaint within 48 hours of it being made.

Business continuity and managing risks

64. The funeral director must prepare and maintain a written contingency plan which contains provisions about:
    - Dealing with any unexpected increase in the number of deaths.
    - Contingency arrangements for any unexpected disruption to or loss of services.
65. When drafting and reviewing this plan, where possible, the funeral director must engage with third parties such as: local crematoriums and burial grounds, other funeral directors and their relevant NHS Board.
66. The plan must be made available to inspectors on request and should be reviewed annually.
67. The funeral director must notify inspectors of any serious business or service failures as soon as practicable e.g. in the event of a fire, bankruptcy, etc.

Addendum for all SAIF members

The following regulations apply to all SAIF members and should be read in conjunction with the U K Code of Practice for Funeral Directors.

COMPLIANCE WITH STATUTORY GOVERNMENT LEGISLATION

A funeral director will have a good understanding of all legislation relating to the funeral sector and the operation and management of a business in the UK. All such legislation will be complied with.

All funeral directors must fully comply with the CMA Funerals Market Investigation Order 2021.

All funeral directors carrying out the activities of a funeral director in Scotland, regardless of where they are based, must fully comply with any Code of Practice or future regulation issued by the Scottish Parliament.

All funeral directors must fully comply with any future funeral legislation issued by a Parliament of the UK.

All funeral directors must comply with the Equalities Act 2010.

All funeral directors must comply with all health and safety legislation, be registered for the General Data Protection Regulations (GDPR) and all other legislation relating to the operation of a funeral business.

For any services arranged in a customer's home, the funeral director must allow a 14-day cooling off period in compliance with the Consumer Contracts (Information, Cancellations and Additional Changes) Regulation 2013. If the customer wishes to commence within the 14 days, a waiver must be signed.

All funeral directors must cooperate fully with any future government or industry regulators. They must inform them of any changes to their business and comply with any written orders or requirements made by them.

All funeral directors should consider preparing a policy on reducing the

impact of their company on the environment.

GENERAL CONDUCT OF A FUNERAL DIRECTOR AND SUITABILITY OF STAFF

Staff will be competent in all aspects of funeral work and the management of the business relevant to their role and responsibility. They should be able to demonstrate good people skills and operate the business in a legal and ethical way.

Owners, directors and staff must be professional, respectful and diligent and appropriate staff must be experienced in the laws and procedures pertaining to the burial, cremation,

transportation, all other legal methods for the disposal of the dead and all other associated services (e.g., embalming) offered to the public.

Funeral directors and staff must conduct themselves in a totally professional manner, and behave sensitively, with courtesy and complete dignity at all times. This includes complying with SAIF's social media policy for members (which can be found on the SAIF website).

A funeral director must act in the best interests of each customer by treating them with respect and consideration for their loss and at all times ensure the confidentiality of information obtained in relation to the customer.

A funeral director must not solicit or offer any inducement for instructions for funeral service or any associated services. Any donations or charitable works must be recorded as required by the CMA Funerals Market Investigation Order 2021.

A funeral director must display in a clear and prominent manner at each of its premises and on any websites or online channels the ultimate owner of the business.

All advertising should conform to the recognised British Codes of Practice, as set out by: The Advertising Standards Agency, The Committee of Advertising Practice, and the Office of Communications (Ofcom).

All members should encourage staff to study for Appropriate qualifications and participate in continuous professional development.

Planning the funeral

Where the deceased has not set out before dying who should arrange their funeral the funeral director must ensure the person arranging the funeral is aware of the law concerning the right to arrange a funeral. It is then for the client to decide if they wish to continue.
In Scotland this is set out in the Burial and Cremation (Scotland) Act 2016 section 65 for adults and section 66 for children.
In England, Wales and Northern Ireland, the deceased's personal representatives (being the executors of their will, or the administrators of their estate under the intestacy rules) have the right to determine how and where a body should be disposed of – even if other members of the family object.

If a person dies leaving a valid will, then the executors of that will have the right to deal with the body. The executor(s)' powers derive from the will itself and not the grant of probate, meaning that the executor(s) can deal with the funeral arrangements even if they have not yet obtained a grant of probate. If there is more than one executor and they disagree as to how the body should be dealt with, then none of them take precedence over the other(s). If an agreement cannot be reached, then an application can be made to court so that a judge can decide. It is recommended that in situations such as these, the executors seek independent legal advice.

It should also be noted that if the deceased left instructions in their will as to how their body should be disposed of, this is usually considered an expression of wishes and is not legally binding on the executors, although they should take these wishes into account.

If a person dies without a will then the person entitled to deal with the body is either the person appointed as the administrator on the grant of letters of administration, or if no administrator has yet been appointed, then the person(s) with the highest right to take out a grant of letters of administration in accordance with Section 46 of the Administration of Estates Act 1925 and rule 22.1 of the Non-Contentious Probate Rules 1987. If there is more than one person with the highest right, then they are all equally entitled to deal with the body. As above, if an agreement cannot be reached then an application can be made to court so that a Judge can decide. It is recommended that in situations such as these, that the parties seek independent legal advice.

If the deceased had no living relatives, then the householder in which the deceased died and/or the person with actual possession of the body has the right to dispose of it (usually a hospital or coroner). Otherwise in the absence of the above, Section 46 of the Public Health (Control of Disease) 1984 provides that it shall be the duty of the local authority.

To enable the customer to make an informed decision about the goods and services they would like, before the customer makes a decision the funeral director must:

- Establish if the deceased had left any funeral instructions.
- Establish if the deceased had pre-paid for their funeral.
- Ask the family what funeral wishes they may have decided upon, thus far and advise on suitable options to enable the customer to arrive at an informed decision.
- Offer the range of products and services that are suitable to the needs and requirements of the customer.

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- Establish if the deceased had left any funeral instructions.
- Establish if the deceased had pre-paid for their funeral.
- Ask the family what funeral wishes they may have decided upon, thus far and advise on suitable options to enable the customer to arrive at an informed decision.
- Offer the range of products and services that are suitable to the needs and requirements of the customer.

Funeral Directors' Premises and Care of the Deceased

Refrigeration Requirements: In Scotland, members must have refrigeration either on their own premises or in premises under their control, and it must be exclusively for their own use. Primary refrigeration must consist of permanent facilities, while temporary refrigeration, such as pop-up mortuaries, can only be used as a backup option.

Preparation of the Deceased.

In the absence of specific instructions, all deceased are prepared to the minimum standard expected by SAIF, a copy of which can be obtained from the SAIF Business Centre.

Complaints

SAIF members must promptly notify the SAIF Business Centre of any complaints related to the Inspector of Burial, Cremation, and Funeral Directors in Scotland or the CMA as soon as they become aware of such issues.

Providing Services as a Sub-Contractor

If a member of SAIF offers funeral services, including direct cremation and / or burial, to any organisation, they must adhere to the minimum standards outlined in the SAIF Code of Practice regarding the content and responsibilities related to those services. This obligation takes precedence over any directives or restrictions issued by the instructing company, unless it is clearly demonstrated that such directives or restrictions are made at the request of the company's client.

Revised SAIF Code of Practice March 2026