

Coronavirus (COVID-19)

Guidance for cremation authorities and burial authorities on
managing their services and funeral services

Health Protection Division, Scottish Government

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1. Introduction

1.1 Key principles

This guidance is primarily designed to assist burial and cremation authorities in Scotland in the management of continuing to provide funeral services and sharing of good practice for funeral services. This guidance has been developed to ensure that:

- Those confirmed or likely to have died with presumed COVID-19 and their family are treated with sensitivity, dignity and respect.
- The different cultural practices and rites of passage observed in Scotland by a variety of communities are respected and adhered to as closely as circumstances permit, with safety being paramount.
- A safe and healthy working environment continues to be provided for managers and their staff working in the sector.
- Crematoriums and burial grounds work as safely as possible, to ensure the timely cremation or burial of the deceased. This is required to facilitate the wider 'flow' of the death management sector and to assist burial and cremation authorities, funeral directors and health boards in continuing to deliver an effective and safe service during the current pandemic.
- The work of burial authorities and cremation authorities is crucial in the management of family expectations around funeral arrangements, bereavement and the grieving process; which will be especially difficult during this current pandemic.

1.2 Status of this guidance

As the COVID-19 pandemic progresses, alongside our understanding of the disease and a greater evidence base, further lessons are likely to be learned with best practice developed.

This guidance will remain under review in response to such information and be consistent with relevant legislation, NHS Inform and Public Health Scotland documentation.

1.3 Background

In January 2020, coronavirus (COVID-19) was classified in the UK as a 'high consequence infectious disease' (HCID). This was an interim recommendation in recognition of the evolving situation, and the limited data available, and it was agreed to keep the HCID status under review. Infection control guidance to protect staff from this new threat was agreed across all four UK nations. It reflected the then current WHO guidance, and was consistent with the latest evidence from systematic reviews.

In March 2020, when more was understood about the behaviour of the virus and its clinical outcomes, the four nations agreed that COVID-19 should no longer be classified as a HCID.¹ As a result of this and a review of the latest evidence regarding what infection control measures were required, that guidance was updated to reclass it as Hazard Group HG3.²

The virus (SARS-CoV-2) that causes the disease (COVID-19) is understood to be spread from person to person through:³

- Droplets from the nose or mouth of a person infected with the virus. Droplets are produced when a person coughs or sneezes and only travel a short distance through the air. The risk of infection increases the longer someone has close contact with an infected person.
- Contact with contaminated surfaces, including skin (hands), which can then subsequently be transmitted through touch to the facial mucosal membranes (e.g. touching eyes, nose and mouth).

2. COVID-19 infection risk from deceased individuals

Current evidence indicates that there is a small risk of COVID-19 infection from deceased individuals.⁴ Any infection risk from people who have died as a result of presumed COVID-19, primarily arises as a result of aerosols generated in the post-mortem handling of the deceased, particularly the recently deceased. Direct handling of the deceased is carried out by funeral directors and separate guidance for this sector has been [published](#).

Specific COVID-19 infection risk to crematorium and burial ground staff from handling the deceased in a sealed coffin is negligible.

Normal infection control procedures should be followed when dealing with any potential spillage/leakage from any sealed coffin if the deceased died as a result of a notifiable disease.⁵

¹ <https://www.gov.uk/guidance/high-consequence-infectious-diseases-hcid#classification-of-hcids>

² <https://mrc.ukri.org/documents/pdf/working-with-biological-agents/>, page 23

³ Joint Department of Health and Social Care (DHSC), Public Health Wales (PHW), Public Health Agency Northern Ireland (PHANI), Health Protection Scotland (HPS) and Public Health England (PHE) guidance [Transmission characteristics and principles of infection prevention and control](#) section 1 'routes of transmission'.

⁴ Public Health England (PHE), [Guidance for care of the deceased with suspected or confirmed coronavirus](#), subheading 'risk of transmission of COVID-19 from an infected body'

⁵ <http://www.legislation.gov.uk/asp/2008/5/schedule/1/part/1>

3. Current legislative provisions for burial or cremation

3.1 Opening of crematorium and burial grounds – emergency legislative provision

Under the UK Coronavirus Act 2020, Scottish Ministers have made the Health Protection (Coronavirus) (Restrictions) (Scotland) Regulations 2020 ('the Regulations').⁶

Cremation authorities

Following an amendment to the Regulations which came into force on **15 July 2020**, crematoriums are now permitted to be open to members of the public. This enables cremation authorities to open for all services in addition to funerals, for example, to view the book of remembrance or for ashes to be collected by members of the public.

Each cremation authority can decide what is appropriate for their crematorium to offer at this time.

The cremation authority must continue to take reasonable measures to ensure that those attending a funeral service, or otherwise attending the crematorium for any other service, remain 2 metres apart (except where they are from the same household, or a carer and the person is assisted by the carer).

Ashes dispersal

Attendance in the grounds of the crematorium to witness the dispersal of ashes is permitted. The appropriate [physical distancing](#) must continue to be observed.

Each cremation authority can decide what is appropriate for their grounds and whether they are able to offer this service.

Burial authorities

The Regulations have not required burial grounds to close to the public.

Public access to burial grounds, where that is normally permitted by the burial authority, can continue. Access continues to be at the discretion of the burial authority.

3.2 Application for cremation – emergency legislative provision

The UK Coronavirus Act 2020 allows Scottish Ministers to suspend the effect of certain provisions in relation to the making of an application for cremation, and the handling of ashes following a cremation. The provisions that may be suspended are in the Burial and Cremation (Scotland) Act 2016 ("the 2016 Act") and the Cremation (Scotland) Regulations 2019.

⁶ <http://www.legislation.gov.uk/ssi/2020/103/contents/made>

On 8 April 2020 the Scottish Ministers published a determination, in exercise of the power contained in paragraph 8(1) of schedule 14 of the UK Coronavirus Act 2020.⁷

The determination provides that the offence in section 49 of the 2016 Act is not to have effect in relation to the signing of a declaration in an application for cremation made under the 2016 Act. This means that any relative (or friend of long standing) of the deceased can make arrangements for cremation, regardless of where they are placed in the statutory hierarchy set out at section 65 and section 66 of the 2016 Act. The applicant must still be one of those in the hierarchy. This provides flexibility in the event that close relatives of the deceased are unwell and unable to complete the cremation application form, and allows funeral arrangements to progress.

This emergency provision came into force on **Wednesday 8 April 2020**. This change will remain in place until revoked by a subsequent determination of the Scottish Ministers under schedule 14 of the 2020 Act.

Further information is available on the [Scottish Government website](#).

It is not permitted for a funeral director to sign a cremation application form on behalf of an applicant.

If an applicant cannot sign a cremation application due to adherence to NHS advice on staying at home, physical distancing or shielding, a supplementary form has been produced for use by funeral directors and cremation authorities to ensure arrangements can continue and an audit trail of this action captured. This is set out below.

3.3 Application for cremation – supplementary form

Due to the current pandemic, where a funeral director is unable to receive a signature from a person listed in sections 65 or 66 of the 2016 Act to complete an application for cremation, a supplementary form can be supplied to ensure arrangements can proceed.

This form can be downloaded from the [Scottish Government website](#).

3.4 Application for burial

Application forms for burial are the responsibility of each burial authority.

Confirmation of lair ownership is required before progressing an application for burial. Processes should be examined and kept under review to take into account the impact that advice on [physical distancing](#) may have for applicants (e.g. documents provided electronically from applicant and/or funeral director).

⁷ <https://www.gov.scot/publications/coronavirus-act-2020-c-7-direction-under-paragraph-81-of-schedule-14/>

Required signatures may also be difficult to obtain during the current pandemic due to adherence to public health advice. Burial authorities should consider creation of an appropriate supplementary form or other method that satisfies their requirements for burial for use by local funeral directors/applicants.

4. Funeral services

4.1 Provision of funeral services

The Scottish Government acknowledges the large amount of work and significant effort cremation authorities and burial authorities, working with funeral directors, have undertaken to continue to offer funeral services during this pandemic.

All cremation and burial authorities should consider continuing to implement methods of either streaming services online or to record services for bereaved families. This will assist in ensuring funeral service attendance is kept to a small number of people.

Local funeral directors will play an important role in helping to establish and communicate this service provision to bereaved families.

4.2 Funeral services

Guidance on [funeral services](#) has been published on the Scottish Government website separately. This should be read in conjunction with this document

It remains the responsibility of burial and cremation authorities to implement policies regarding the required conduct or management of a funeral service in their crematorium or burial ground. This should be in line with current public health advice and associated mitigations.

Further appropriate infection control measures relevant to the provision of funeral services is set out below in Section 5.

Restricting numbers of attendees

An amendment to the Regulations, which came into force on 15 July 2020, removes the legislative restrictions on who can attend a funeral.

To assist individual organisations to continue to safely accommodate funeral services and in line with wider public health measures, a maximum number of 20 people should attend a funeral. This applies to both indoors and outdoors funeral services.

Crematoriums must continue to ensure that a safe distance, of at least 2 metres, can be maintained between individuals and household groups. Burial authorities should also continue to ensure these measures and relevant mitigations are put in place.

Due to differences in capacity across different venues as a result of physical distancing measures, fewer than 20 people may be able to attend.

Wherever possible and if available, those wishing to attend or follow a funeral service should do so by electronic means, such as via an online streaming service or by viewing a recording of the service.

Mementos or actions during a service

Permission for any specific action by attendees during a funeral service will be based upon the authority's own COVID-19 related risk assessments for actions mourners may wish to undertake during a service e.g. placing of a photograph on the coffin or touching a coffin during a service.

This risk assessment will take into account the authority's own circumstances and applicable public health advice relevant to the current pandemic, including advice on physical distancing.

5. Infection control

5.1 Non-healthcare settings

As a non-healthcare setting, both cremation and burial authorities should, as a minimum, ensure that relevant Health Protection Scotland (HPS) guidance is reviewed and adhered to. This is [COVID-19 - guidance for non-healthcare settings](#).

As HPS guidance makes clear recommended measures to ensure that COVID-19 infection risk is appropriately mitigated in a non-healthcare setting include:

- maintaining scrupulous hand hygiene and
- adhering to advice on [self/household isolation](#), [physical distancing](#) and [shielding](#).

The Scottish Government has published [guidance for non-healthcare public services](#) that is relevant for both cremation and burial authorities. It collates steps outlined in the above Health Protection Scotland guidance in maintaining adherence to physical distancing advice in the workplace.

5.2 Precautions to take

This below is not intended to provide an exhaustive checklist on precautions to take. Further public health measures, as appropriate or required by individual circumstances, will be required to be implemented.

Management of funeral services

- Signpost stakeholders and funeral service attendees to wider [guidance on funeral services](#);
- No more than 20 people should attend a funeral service. This number does not include cremation or burial authority staff, funeral director staff or any celebrant.

- Restrict the number of attendees further, if necessary, to ensure that physical distancing and wider public health requirements are adhered to, taking into account your own risk assessments, circumstances and facilities;
- Reiterate that all attendees (including staff and celebrant(s)) must adhere to physical distancing requirements, including the need to maintain 2 metres distance between different households throughout a service (except where they are from the same household, or a carer and the person is assisted by the carer);
- Regular cleaning of enclosed public spaces should be carried out i.e. after each funeral service held at a crematorium of areas, and especially surfaces, attendees may have been or touched;
- Seek to provide and signpost to hand washing or hand sanitisation facilities for members of the public who are attending a funeral service;
- Where possible, manage the flow of groups in and out of a venue or space to minimise overlap between different groups and to facilitate cleaning processes;
- Maximise ventilation rates on premises by opening windows and doors where appropriate and if possible;
- Advise attendees that face coverings must be worn at all indoor funeral services. More information, including exemptions, can be found in the [guidance for funeral services](#).
- Communal singing should be avoided e.g. the singing of hymns. This is due to the potential for increased risk generated from aerosol particles and droplets as a result of that action. Recordings of music should instead be used. See relevant sections of [Scottish Government places of worship guidance](#) and [marriage and civil partnership guidance](#) for further information.
- Signpost those organising a funeral to public information available on the [Scottish Government website](#) about coronavirus (COVID-19), which provides important advice applicable for all during this pandemic.

Other precautions

The most effective method of continuing to mitigate infection risk in a non-healthcare setting is through regular environmental cleaning, regular hand hygiene and by following advice on physical distancing.

All staff and visitors should regularly preform hand hygiene, using soap and water or hand sanitiser, to minimise any potential spread of coronavirus (COVID-19) during the course of the working day.⁸

⁸ Information graphs on the correct use of [soap and water](#) and [hand sanitiser](#) are available. NHS 24 have also [published a video](#) advising how hands are washed correctly.

The use of appropriate personal protective equipment (PPE) for staff should also be considered. This may include the use of disposable gloves or fluid resistant face mask/visor when working in public spaces or handling coffins (and therefore in close proximity to others).

If a symptomatic individual has been on the premises, then cleaning and disinfection should be carried out as per the HPS [guidance for non-healthcare settings](#). If there is any visible contamination of body fluids (e.g. from funeral service attendees), then the need for additional PPE should be considered. Ensure hand hygiene is performed after the cleaning is complete.

5.3 Receipt of a coffin

Both burial and cremation authorities should ensure on receipt of a coffin that advice regarding physical distancing is adhered to. This will involve staff maintaining a 2 metre distance from a funeral director and/or visitors, wherever possible.

As a further precaution, authorities should consider wiping down handles or areas where staff may be likely to come into direct contact with the surface (e.g. with a disinfectant/detergent treated cloth) prior to handling.

The use of disposable gloves and/or use of surgical face masks/visors should also be considered during manual handling actions.

Carrying out this action is not to manage any infection risk from the deceased within a sealed coffin, but to mitigate any infection risk from those previously handling the coffin. Coronavirus (COVID-19) is currently known to remain present on surfaces for up to 72 hours.⁹

Important note: the use of PPE does not act as a substitute for regular hand washing and physical distancing. All staff should regularly perform hand hygiene using soap and water or hand sanitiser and maintain the 2 metre physical distancing requirement.

5.4 Safer workplaces

Carrying out a robust risk assessment with full workforce involvement will identify the practical measures that can be put in place to minimise the spread of the virus at a workplace level.

Risk assessments and safe systems of work, taking account of physical distancing, hand washing, surface cleaning and fair work principles, will allow safe operation while protecting employee health and well-being. See the [Scottish Government](#)

⁹ Public Health England, [Guidance for care of the deceased with suspected or confirmed coronavirus](#), subheading 'risk of transmission of COVID-19 from an infected body' and joint Department of Health and Social Care (DHSC), Public Health Wales (PHW), Public Health Agency Northern Ireland, (PHANI), Health Protection Scotland (HPS) and PHE guidance [Transmission characteristics and principles of infection prevention and control](#), section 3.

[website](#), Health Protection Scotland's [COVID-19 - guidance for non-healthcare settings](#) and the [Health and Safety Executive website](#) for further information.

6. Collection of ashes

6.1 Collection of ashes

Cremation authorities can continue to permit ashes to be collected by funeral directors, if the applicant has instructed the funeral director to collect the ashes on their behalf.

Following an amendment to the Regulations, which came into force on 15 July 2020, individuals are also now permitted to attend the crematorium to collect ashes. This remains at the discretion of the cremation authority.

As with all circumstances, collection of any ashes by funeral directors or individuals from the crematorium during the suspension period must be in adherence to advice on [physical distancing](#). Provision for ashes collection will be in agreement between the cremation authority and funeral director or individual.

Further information on ashes handling is available on the [Scottish Government website](#).

6.2 Ashes handling - emergency legislative provisions

The Scottish Ministers published a determination, in exercise of the power contained in paragraph 9(1) of schedule 14 of the UK Coronavirus Act 2020 on 8 April 2020¹⁰. The determination suspends the effect of sections 53 to 55 of the 2016 Act and certain provisions of the Cremation (Scotland) Regulations 2019 in connection with duties for the handling of uncollected ashes.

The determination provides that the duties in relation to uncollected ashes by cremation authorities and funeral directors are suspended. For the duration of the determination, cremation authorities and funeral directors must retain any uncollected ashes, until they are either collected by the applicant or the determination is revoked. Once the suspension is lifted by Scottish Ministers, normal duties will resume for retained ashes.

Where a local authority is making arrangements for a person's remains to be cremated under section 87 of the 2016 Act, we have introduced temporary changes to allow a local authority to make the decision not to take steps to ascertain how the ashes of the cremated person are to be disposed of at that time. They can choose to submit the cremation application form without making any declaration to that effect. The local authority will be required to retain the ashes for the duration of the suspension and then attempt to trace family members to ascertain their wishes for the ashes, when the suspension is lifted.

¹⁰ <https://www.gov.scot/publications/coronavirus-act-2020-c-7-direction-under-paragraph-91-of-part-2-of-schedule-14/>

These emergency provisions came into force on **Wednesday 8 April 2020**. These changes will remain in place until revoked by a subsequent determination of the Scottish Ministers under schedule 14 of the 2020 Act.

Further information is available on the [Scottish Government website](#).

7. Test and Protect

7.1 Test, Trace, Isolate, Support - “Test and Protect”

Test and Protect, is a public health measure designed to break chains of transmission of coronavirus (COVID-19) in the community. A full suite of guidance is available on the Scottish Government’s website [here](#).

Advice for employers on [helping staff who need to self-isolate](#) is also available.

[Multi-sector guidance has now been published](#). As part of this guidance, implementation of Test and Protect is now applicable to those making provision for funeral services.

7.2 Mitigations

In non-health and social care workplace settings, where Infection Prevention Control measures have been utilised, such as use of protective screens or use of PPE (visors, masks, gloves etc.) the contact tracer will conduct a risk assessment based on the level of PPE used, the level of exposure and whether the case, contact, or both, were wearing PPE, to decide whether an exposure should result in the recommendation of isolation of a contact. The priority of Test and Protect is public health and to break the chain of transmission of COVID-19.

For more information, see Health Protection Scotland’s [COVID-19 Contact Tracing in complex settings](#).

8. Conclusion

The Scottish Government acknowledges that this continues to be a very difficult time for families and all organisations working to provide funeral services during this pandemic. We continue to review current procedures and will issue updates as soon as they are available.

Annex A: Updates to guidance

Version	Date	Summary of changes
1	13/04/20	First publication
1.1	15/04/20	<ul style="list-style-type: none"> - Further emphasis placed on importance of hand hygiene. - Minor grammatical edit or clarifications throughout.
1.2	20/04/20	<ul style="list-style-type: none"> - Clarity that symptomatic individuals should not attend funeral services.
1.3	30/04/20	<ul style="list-style-type: none"> - Reformatting and refinement of document for ease of navigation and reading. - Refinement of wording on infection risk from deceased, in line with updated in funeral director guidance. - Inclusion of updated Health Protection (Coronavirus) (Restrictions) (Scotland) Regulations 2020 information relevant to cremation authorities and opening of grounds. - Changing of 'social distancing' to 'physical distancing' in line with NHS Inform terminology.
1.4	04/06/20	<ul style="list-style-type: none"> - Removal of funeral services guidance, linking out to separate publication. - Addition of ashes dispersal information in Section 3. - Inclusion in Section 4 of further information on restricting numbers of attendees. - Addition of further infection control measures and precautions under Section 5. - Refinement of language in Section 6 'collection of ashes' and updating of gov.scot links.
1.5	26/06/20	<ul style="list-style-type: none"> - Addition of section 7 on test and protect
1.6	15/07/20	<ul style="list-style-type: none"> - Updated for to take account of phase 3 changes. - Addition of information advising communal singing should be avoided - Refinement of precautionary measures. - Refinement of information relating to Test and Protect.
1.7	07/08/2020	<ul style="list-style-type: none"> - Updated for mandatory face coverings