



## Gatherings of people for funeral services - risk assessment framework

Updated 04 May 2020

The current message from the all four government's in the UK is that funerals should continue, as far as possible, taking into account all the guidelines issued for minimising the risk of transmission, including the Public Health England guidance for managing a funeral during the coronavirus pandemic, which aims to ensure bereaved people can mourn appropriately, whilst minimising the spread of coronavirus (COVID-19) infection.

### Guidance for managing a funeral

Funeral directors should comply with the government issued guidance that is relevant to the area in which they operate, which can be accessed via the web addresses set out at the [foot of this document](#). It is strongly advised that you read all guidance that is relevant to your business in full.

The guidance sets out a number of clear instructions that should be adhered to in every case. For example:

1. The number of mourners who attend a funeral should be restricted to a number that allows for a safe distance of at least 2 metres (6 ½ ft) to be maintained between individuals at all times.
2. Outside of Wales, only the following should attend in person, alongside the funeral director, chapel attendant, and funeral staff:
  - members of the person's household
  - close family members
  - or if the above are unable to attend, close friends<sup>1</sup>
  - attendance of a celebrant of choice, should the bereaved request this
3. In Wales, the rules are slightly different and only the following should attend in person:
  - the person arranging the funeral
  - a person invited to the funeral by the person arranging the funeral
  - the carer of a person attending
4. No extremely clinically vulnerable person<sup>2</sup> should attend a funeral at the same time as someone who is otherwise self-isolating.

These rules apply to all funerals without exception but deciding how to ensure they are adhered to will require a level of judgment on the part of those managing the funeral.

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<sup>1</sup> In Scotland, the Regulations provide that 'a friend' (rather than 'close friends') is able to attend the funeral.

<sup>2</sup> The UK Government definition of a clinically extremely vulnerable person is set out at the foot of this document.

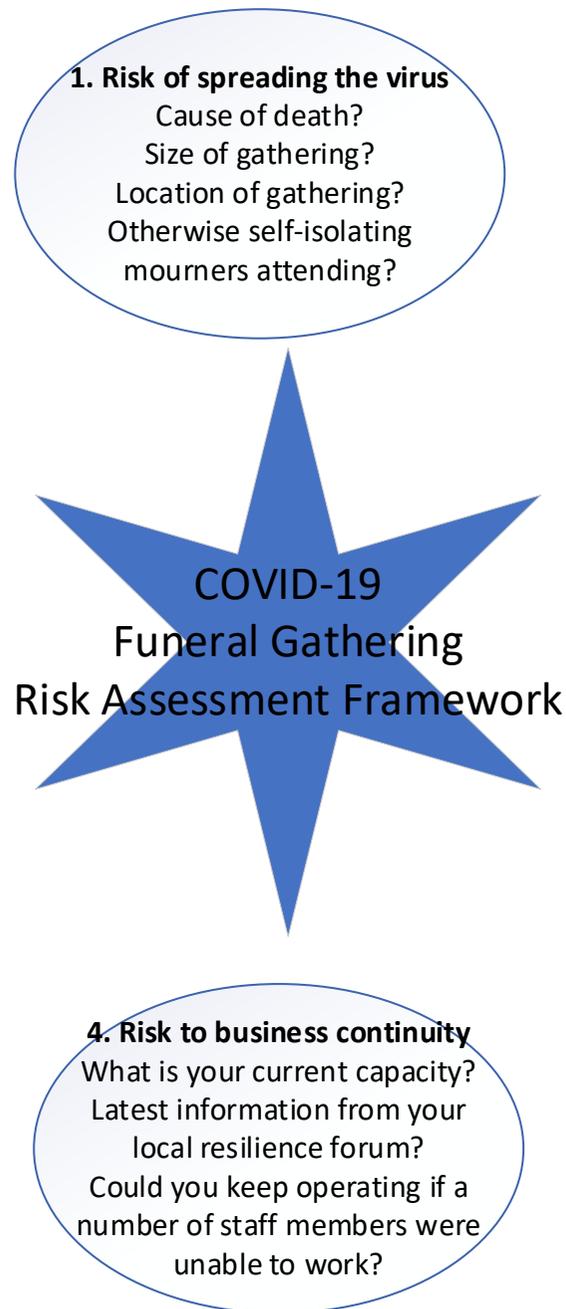
The PHE guidance, and guidance issued by the Welsh and Scottish Governments, also sets out a number of other measures that those managing funerals should consider when arranging and managing funeral gatherings. Decisions about the application of these measures will require funeral directors to think carefully and conduct sound risk assessments.

### Assessing risk in accordance with the Guidance

This document and the framework set out below is designed to help funeral directors conduct risk assessments to inform their decisions in relation to all activities relevant to the managing of funeral gatherings. In consultation with your local crematoria and cemeteries, you should assess each funeral individually and consider the options available and how these could be facilitated.

Relevant considerations will include the need to protect mourners, to avoid larger than necessary gatherings of people, for good hand hygiene and the avoidance of any unnecessary physical contact. This is not only for the benefit of those attending funerals, it also supports the urgent need to protect funeral home, crematorium and cemetery employees, who need to remain healthy and able to work at this critical time.

If, having considered each of these factors, you do not feel comfortable arranging the funeral in accordance with your client's instructions, or that doing so would be inconsistent with government guidance, you should not progress the arrangements. This will be difficult to explain to some families but funeral directors have a serious responsibility to take steps to prevent harm to staff, attendees and the wider population.



**6. Views and requirements of your client**  
You should always comply with government guidance but this does not preclude you from discussing even lower-risk options with your client.

**5. Availability of other options**  
Are lower-risk options, such as webcasting, available?  
Discuss these options with your client/the bereaved family.

**1. Risk of spreading the virus**  
Cause of death?  
Size of gathering?  
Location of gathering?  
Otherwise self-isolating mourners attending?

**2. Risk to the health and safety of attendees**  
How many high risk attendees are expected?  
Clinically vulnerable mourners attending?  
What additional steps can be taken to protect them?

**3. Risk to the health and safety of staff**  
Are any staff members in higher risk groups (e.g. pregnant)?  
Can additional steps be taken to protect them?

**4. Risk to business continuity**  
What is your current capacity?  
Latest information from your local resilience forum?  
Could you keep operating if a number of staff members were unable to work?

Risk factor	Considerations	Possible mitigating steps
<p>1. Risk of spreading the virus</p>	<p>The risk of spreading the virus begins with your first physical contact with the family.</p> <p>If a death is COVID-19 related, this will likely increase the risk that immediate family members will have been exposed to the virus.</p>	<p>You should take steps to ensure all initial contact with the family (e.g. the arrangement meeting) is conducted remotely, via telephone or video link.</p> <p>Ascertain whether any of those who plan to attend are symptomatic (e.g. a dry cough or fever). If they are, you should explain that it is unlikely that they will be able to attend the funeral service in person but that alternative options, such as webcasting the service, are available. You should emphasise this with your client to ensure that anyone experiencing symptoms refrains from attending.</p> <p>Ascertain whether any of those who plan to attend are in the Government-advised 14-day household isolation period. If they are, this will not necessarily preclude them from attending the funeral but will impact how you interact with them and facilitate their attendance. You should explain these limitations to the family at the outset.</p> <p>You and your staff should only physically meet with family members ahead of the funeral if you are satisfied that doing so is consistent with government guidance (e.g. when bringing the deceased person into your care and maintaining a 2-metre distance). As mentioned above, current advice is that members of the same household as an infected person or someone showing symptoms should self-isolate for 14 days before</p>

		coming into contact with anyone else, except to actually attend the funeral.
	If you know that someone who is otherwise self-isolating is planning to attend.	<p>Government guidance allows for individuals who are not experiencing symptoms of Covid-19 but are self-isolating due to someone in their household having displayed symptoms to attend funerals in person, provided they are close family or fall into one of the other categories set out in the guidance.</p> <p>If such a person plans to attend, you should take particular care to keep them apart from individuals who are not self-isolating and from the same household. Possible measures could be to seat them several metres away from other mourners and to ask them to enter and leave the venue separately from the other mourners.</p>
	Where will the gathering be held? Services in indoor venues such as churches and funeral homes increase the risk that the disease will be spread. Outdoor services (e.g. at the graveside) carry a lower risk.	<p>You could talk to the family about the possibility of an outdoor service, particularly if one or more attendees is otherwise self-isolating.</p> <p>Again, you could discuss the option of webcasting/recording the service for some or all attendees.</p> <p>If the crematorium does not have webcasting/recording facilities, you could enquire about whether the family are permitted to do this themselves, using their own devices.</p>
	What is the size of any proposed gathering of people? The more people brought together	The guidance limits the types of person that can attend but does not set a limit on the number of attendees. The size and circumstance of the

	<p>in a single place, the greater the risk of spreading the disease.</p>	<p>venue will determine the maximum number that can be accommodated whilst also facilitating social distancing.</p> <p>However, it is recommended that you seek to keep attendance size to as small a number as possible and practicable. For example, if a very large number of people live in the same household, you could discuss whether it might be acceptable for some members of the household to view the service remotely rather than attend in person.</p> <p>The rules limiting the categories of person who can attend a funeral will have the effect of significantly limiting the numbers of attendees in most cases.</p> <p>Anyone who is experiencing symptoms, such as a dry cough or fever should not attend. You should emphasise this with your client to ensure that anyone experiencing symptoms refrains from attending.</p>
	<p>Other practical steps to consider:</p> <ul style="list-style-type: none"> <li>- Donation boxes</li> <li>- Your property</li> <li>- Limousines</li> <li>- Viewing</li> </ul>	<p>It is worth considering not having donation boxes at the funeral, but encouraging clients to use an online platform such as <a href="https://www.justgiving.com">justgiving.com</a>. This will help prevent spread because the box and money inside will be touched by numerous people. It also allows non-attendees to donate.</p> <p>You should remember areas of your property that have come into contact with members of the public and regularly clean them. For example, wiping down limousine door handles.</p>

		<p>You should consider asking clients to use their own transport where possible and may even wish to consider ceasing limousine hire for the time being, as it can be the place where longest period of time is spent in close proximity to clients.</p> <p>You should consider allowing only very close family members to a viewing on your premises, and install hand sanitiser in all public areas.</p>
<p>2. Risk to health and safety of individual attendees</p>	<p>What is the size of any proposed gathering of people? The more people brought together in a single place, the greater the risk to mourners and members of staff.</p>	<p>You should consider ways to make it easier for mourners to observe social distancing rules. These could include inviting mourners to take their seats individually and ensuring seats are kept a suitable distance apart.</p> <p>The guidance limits the types of person that can attend but does not set a limit on the number of attendees. The size and circumstance of the venue will determine the maximum number that can be accommodated whilst also facilitating social distancing.</p> <p>However, it is recommended that you seek to keep attendance size to as small a number as possible and practicable. For example, if a very large number of people live in the same household, you could discuss whether it might be acceptable for some members of the household to view the service remotely rather than attend in person.</p> <p>Anyone who is experiencing symptoms, such as a dry cough or fever should not attend. You should emphasise this with your client to ensure that</p>

		<p>anyone experiencing symptoms refrains from attending.</p> <p>You could remind attendees that physical contact with others (e.g. hugging and shaking hands) risks spreading the virus. You should request that attendees follow social distancing guidelines.</p>
	<p>If you know that someone who is otherwise self-isolating in accordance with government guidance is planning to attend (note, only asymptomatic individuals should attend the funeral).</p>	<p>You should ascertain whether anyone considered to be <b>clinically vulnerable</b> also plans to physically attend the funeral. If they do, you should ensure they are aware that someone who is otherwise-self isolating will also be in attendance. You should also arrange for them to be seated as far away from each other as is practicable (and in no circumstances, within 2 metres of each other).</p> <p>You should ascertain whether anyone considered to be <b>clinically extremely vulnerable</b> plans to physically attend the funeral. If they do, you should advise your client that this person must not attend at the same time as a person who is otherwise self-isolating in accordance with government advice. A possible solution could be for either one of the individuals to join the service via video link/webcasting.</p>
	<p>If you know that someone who is <b>clinically vulnerable</b> or <b>clinically extremely vulnerable</b> is planning to attend.</p>	<p>You may wish to take additional steps to ensure this person is kept separate from others, particularly anyone who is otherwise self-isolating in accordance with government guidance.</p> <p>In the case of someone who is <b>clinically extremely vulnerable</b>, you should make sure that they do not attend at the same time as someone who is</p>

		otherwise self-isolating in accordance with government guidance.
3. Risk to health and safety of individual staff members	You should not knowingly ask staff members to physically meet with individuals who, according to government advice, should be in self-isolation, other than to facilitate the attendance of asymptomatic individuals at the funeral.	<p>You and your staff should only physically meet with family members if you are satisfied that doing so is consistent with PHE guidance.</p> <p>Anyone experiencing symptoms, such as a dry cough or fever (or lives with someone experiencing such symptoms) should be self-isolating but you should check with your client.</p> <p>If you think there is a risk that the bereaved family should be in self-isolation, you should take steps to ensure all initial contact with the family (e.g. the arrangement meeting) is conducted remotely, via telephone or video link.</p>
	Do you have a member of staff in a higher risk group (pregnant, over 70, immunocompromised) who should be kept away from large gatherings?	<p>You should consider ways in which you can limit high risk staff members' physical contact with groups of people.</p> <p>You should remind all attendees that they should not touch or shake hands with staff members.</p> <p>You should consider where else, where appropriate, they can be employed in the business.</p>
	Do you have a member of staff in a higher risk group (pregnant, over 70, immunocompromised) who should be kept away from large gatherings?	<p>You should consider ways in which you can limit high risk staff members' physical contact with groups of people.</p> <p>You should consider where else, where appropriate, they can be employed in the business.</p>

		<p>You could consider furloughing these staff members under the government employee retention scheme until the risk of infection is sufficiently reduced.</p> <p>You should remind all attendees that they should not touch or shake hands with staff members.</p>
	<p>Risk also means considering employees' mental health and listening to their concerns</p>	<p>Keep in very regular contact with your employees about what they are thinking and how they are mentally feeling, and act accordingly. It may be that staff appear perfectly fit and well, but have concerns or fears they have not expressed to you but will impact on their mental health and performance.</p>
<p>4. Risk to business continuity (this is a general risk but will impact on your risk-assessments in relation to individual funerals)</p>	<p>It is vitally important that funeral directing businesses can continue to operate over the coming weeks and months.</p> <p>What is your local resilience forum telling you?</p> <p>What is your current capacity?</p> <p>Could you keep operating if a number of staff members had to self-isolate or became unwell?</p> <p>Do you have a contingency plan?</p>	<p>If your own business, or local resilience network, is under strain, it may be appropriate to take additional measures to protect the workforce in order to ensure that funeral service capacity in your area is not overwhelmed. In particular, this could mean treating all funerals as high risk and limiting the number of attendees/mode of attendance.</p> <p>As you notice a shift in your ability to operate normally, ensure you keep in regular communication with staff and clients, particularly through digital (website), social media and direct contact (email)</p>
<p>5. Availability of alternative options</p>	<p>Is a webcasting service available at the crematorium?</p> <p>Can you record on DVD or if not just audio?</p>	<p>If an appropriate alternative is not available at the chosen venue, you could discuss other venue options with your client.</p>

		You could discuss the possibility of a very small service for immediate family at the crematorium, followed by a larger gathering for a service at a later date when the risks of spreading the virus are lower.
6. Views and requirements of client/family	Is the family open to options such as webcasting or a small funeral with a larger service to follow at a later date?	Even if you assess that there is only a medium to low risk of spreading the virus, if the family is happy to consider lower-risk alternatives such as webcasting the service and reducing the number of physical attendees, this will help safeguard your staff and the wider population.

## Who is classed as Clinically vulnerable?

Clinically extremely vulnerable people may include the following people. Disease severity, history or treatment levels will also affect who is in the group.

1. Solid organ transplant recipients.
2. People with specific cancers:
  - people with cancer who are undergoing active chemotherapy
  - people with lung cancer who are undergoing radical radiotherapy
  - people with cancers of the blood or bone marrow such as leukaemia, lymphoma or myeloma who are at any stage of treatment
  - people having immunotherapy or other continuing antibody treatments for cancer
  - people having other targeted cancer treatments which can affect the immune system, such as protein kinase inhibitors or PARP inhibitors
  - people who have had bone marrow or stem cell transplants in the last 6 months, or who are still taking immunosuppression drugs
3. People with severe respiratory conditions including all cystic fibrosis, severe asthma and severe chronic obstructive pulmonary (COPD).
4. People with rare diseases and inborn errors of metabolism that significantly increase the risk of infections (such as Severe combined immunodeficiency (SCID), homozygous sickle cell).
5. People on immunosuppression therapies sufficient to significantly increase risk of infection.
6. Women who are pregnant with significant heart disease, congenital or acquired.

People who fall in this group should have been contacted to tell them they are clinically extremely vulnerable.

More detailed guidance can be found at the web address below:

<https://www.gov.uk/government/publications/guidance-on-shielding-and-protecting-extremely-vulnerable-persons-from-covid-19/guidance-on-shielding-and-protecting-extremely-vulnerable-persons-from-covid-19>

If the individual in question is still unsure, they should discuss their concerns with your GP or hospital clinician.

## Government guidance and other useful links:

Up to date government advice: <https://www.gov.uk/government/topical-events/coronavirus-covid-19-uk-government-response>

Social distancing guidelines: <https://www.gov.uk/government/publications/covid-19-guidance-on-social-distancing-and-for-vulnerable-people/guidance-on-social-distancing-for-everyone-in-the-uk-and-protecting-older-people-and-vulnerable-adults>

### England

Public Health England guidance on managing funerals: <https://www.gov.uk/government/publications/covid-19-guidance-for-managing-a-funeral-during-the-coronavirus-pandemic/covid-19-guidance-for-managing-a-funeral-during-the-coronavirus-pandemic>

Public Health England guidance for care of the deceased with suspected or confirmed coronavirus (COVID-19): <https://www.gov.uk/government/publications/covid-19-guidance-for-care-of-the-deceased/guidance-for-care-of-the-deceased-with-suspected-or-confirmed-coronavirus-covid-19>

Contact details for local resilience forums: <https://www.gov.uk/guidance/local-resilience-forums-contact-details>

### Wales

Welsh Government: guidance to local resilience forums and local authorities on funerals: <https://gov.wales/covid-19-guidance-local-authorities-funerals>

Welsh Government: guidance on attending a funeral: <https://gov.wales/attending-funerals-during-coronavirus-pandemic>

### Scotland

Scottish Government: Funeral Industry Blog: <https://blogs.gov.scot/funeral-industry/>

Health Protection Scotland: guidance for non-healthcare settings: <https://www.hps.scot.nhs.uk/web-resources-container/covid-19-guidance-for-non-healthcare-settings/>

Scottish Government: guidance for funeral services: <https://www.gov.scot/publications/coronavirus-covid-19-guidance-for-funeral-services/>

Scottish Government: guidance for funeral directors: <https://www.gov.scot/publications/coronavirus-covid-19-guidance-for-funeral-directors/>

NHS Inform advice on physical distancing: <https://www.nhsinform.scot/illnesses-and-conditions/infections-and-poisoning/coronavirus-covid-19/coronavirus-covid-19-physical-distancing>

NHS Inform advice on shielding of high risk groups: <https://www.nhsinform.scot/illnesses-and-conditions/infections-and-poisoning/coronavirus-covid-19/coronavirus-covid-19-shielding>

## Northern Ireland

Interim Guidelines for Funeral Directors on managing infection risks when handling the deceased: <https://www.health-ni.gov.uk/sites/default/files/publications/health/interim-guidance-for-funeral-directors.pdf>

Guidance for bereaved about funeral arrangements: <https://www.nidirect.gov.uk/articles/coronavirus-covid-19-guidance-bereaved-about-funeral-arrangements>

COVID-19 bereavement resources: <https://www.publichealth.hscni.net/publications/covid-19-bereavement-resources>

**Important note:** all documentation continues to be updated regularly, so documents should continue be checked at source to ensure the latest version is being referred to.

NAFD

4 May 2020