

ANNEX C

Consultation on a proposed Bill relating to burial and cremation and other related matters in Scotland



RESPONDENT INFORMATION FORM

Please Note this form **must** be returned with your response to ensure that we handle your response appropriately

1. Name/Organisation

Organisation

Scottish Borders Council

Title Mr Ms Mrs Miss Dr Please tick as appropriate

Surname

Forename

2. Postal Address

Newtown St Boswells

Melrose

Roxburghshire

Postcode TD6 0SA

Phone

Email

3. Permissions - I am responding as...

Individual

/

Group/Organisation

Please tick as

(a) Do you agree to your response being made available to the public (in Scottish Government library and/or on the Scottish Government web site)?

Please tick as appropriate

Yes No

(b) Where confidentiality is not requested, we will make your responses available to the public on the following basis

(c) The name and address of your organisation **will be** made available to the public (in the Scottish Government library and/or on the Scottish Government web site).

Are you content for your **response** to be made available?

Please tick ONE of the following boxes

Please tick as appropriate

Yes No

Yes, make my response, name and address all available

or

Yes, make my response available, but not my name and address

or

Yes, make my response and name available, but not my address

(d) We will share your response internally with other Scottish Government policy teams who may be addressing the issues you discuss. They may wish to contact you again in the future, but we require your permission to do so. Are you content for Scottish Government to contact you again in relation to this consultation exercise?

Please tick as appropriate

Yes

Annex D

List of consultation questions and consultation response form

How to complete this response form

1 Each question in the consultation paper is listed below. Respondents are invited to answer as many questions as they wish to, and there is no requirement to answer every question. Completing this form as a Word document allows responses to be provided directly on to the form, although respondents may choose to respond in other ways.

2 Some questions provide a check box to provide a response - to mark a box, double-click it and then select 'Checked' from the menu. Where several questions are asked under the same number, the initial question is the one that should be answered using the check box. Further information can be provided by inserting free text under the heading 'Additional information'.

3 Where no check box is provided, responses are sought in the form of free text, which can be inserted under the heading 'Response'.

4 At the end of the questions consultees are invited to provide any other information which they feel is relevant.

5 Once completed this form can be emailed to burialandcremationbill@scotland.gsi.gov.uk or posted to:

Burial and Cremation Consultation
Scottish Government
3E St Andrew's House
Edinburgh
EH1 3DG

6 When returning responses please also complete and return the Respondent Information Form at Annex C. **The closing date for responses is Friday 24 April 2015.**

The legislative framework

Q1 – Do you agree that existing legislation relating to burial and cremation should be repealed and replaced by a new legislative framework?

Yes No Don't Know

Additional information:

Q2 – Are there any particular powers that are required by Burial Authorities or Cremation Authorities that are not provided for by current legislation?

Response:

There is a need for a legal definition around the issue of rights of inheritance of title deeds for burial lairs, to clarify the process of who has the rights to make decisions if the original lair holder is deceased.

Q3 - Do you agree that the proposed Burial and Cremation (Scotland) Bill should apply to all cemeteries and crematoria in Scotland, regardless of whether they are publically or privately operated? If not, please set out reasons why not.

Yes No Don't Know

Additional information:

Q4 - Do you agree that the Bill should contain provisions which apply to all facilities where any new method of disposal which might be introduced in Scotland are carried out?

Yes No Don't Know

Additional information:

Q5 - Do you agree that the Bill should contain provisions to regulate environmentally friendly methods of disposal that are already available in Scotland?

Yes No Don't Know

Additional information:

Q6 – Should the Burial and Cremation (Scotland) Bill contain provisions pertaining to home burial?

Yes No Don't Know

Additional information:

Q7 - In making legal provision for home burial, what factors should be considered?

Response:

- A. Who would be the responsible authority for overseeing the legal process?
- B. And what criteria would be used to legislate?

Consideration should also be given to:-

1. any restrictions to certain ownerships of land such as estates and farms with provision made for removing or the maintenance of burial sites following changes of ownership
2. Provisions on minimum standards for burial (depth, coffin, soil types which should correspond with those in place in the industry). A pre-assessment of any proposed site would be necessary to check if it is suitable, and clarification provided as to who should carry this out.
3. Grave digging and internment for home burials should be carried out by competent staff to ensure appropriate health and safety procedures followed.
4. Prior approvals should be required from the responsible authority and whether this could be incorporated into existing paperwork.
5. Compliance monitoring arrangements
6. Proximity to other properties, other environmental restrictions such as water, archaeology
7. SEPA

Q8 - Are there are any reasons why private cremation should not remain illegal?

Yes No Don't Know

Additional information:

It is critical that cremations from a legal and public transparency and confidence perspective are carried out only in regulated crematoriums.

Q9 - Do you agree that alternative methods of disposing of the dead should be regulated for in this way? Are there any particular alternative methods that should be considered? Are there any particular methods which should be prevented from being used in Scotland?

Yes No Don't Know

Additional information: No. No

Q10 - Do you agree with this definition of ashes? If not, how should ashes be defined?

Yes No Don't Know

Additional information:

Q11 - Do you agree that a minimum distance of 200 yards (182.9 metres) should be required between crematoria and housing? If not, please explain why not.

Yes No Don't Know

Additional information:

These restrictions are unnecessary and inappropriate. The existing controls are historic and pre-date current planning and environmental legislation by a number of decades. Modern practice, technical controls and legislative requirements now ensures that emissions and impacts on the environment and surrounding properties are minimal.

If the distance thresholds remain then they must be clarified what they relate to, the cremator, the building or the land boundaries.

Q12 - What are your views on the use of enforcement powers or penalty powers in response to such a minimum distance being breached?

Response: It should be carried out properly by the regulating authorities. SEPA and the local Planning authority regulate developments of this nature by applying current planning and environmental legislation.

The right to instruct the disposal of human remains

Q13 - Do you agree that the right to instruct the disposal of a body on death in the case of an adult should be vested in the nearest relative using the definition at Section 50 of the Human Tissue (Scotland) Act 2006? If not, why not? In whom should this power be vested instead?

Yes No Don't Know

Additional information: If there is no-one available as defined in list then does the right then pass the local authority or other appropriate body

Q14 - In the case of the death of a person under the age of 16 years, do you agree that the right to instruct the disposal of the body should follow the proposal at paragraph 43? If not, why not? In whom should this power be vested instead? How should this be defined in legislation?

Yes No Don't Know

Additional information: If there is no-one available as defined in list then does the right then pass the local authority or other appropriate body

Q15 - Do you agree with the proposal for who should have the right to instruct the disposal of the body in the event of a stillbirth? If not, why not? Who should have the right to instruct the disposal of the body in the event that the mother or father are unable to do so? How should this right be defined in legislation?

Yes No Don't Know

Additional information:

Q16 - Do you agree with the proposal of allowing someone not listed to instruct the disposal of human remains in the case of a stillborn baby, pregnancy loss and the death of a child only on cause shown? Is it appropriate that no similar provision is proposed for the death of an adult?

Yes No Don't Know

Additional information: No

The management of cemeteries

Q17 - Do you agree that Scottish Ministers should have the power to make regulations pertaining to the general management of cemeteries, including giving Burial Authorities the right to take action to address unsafe, damaged and abandoned lairs and memorials?

Yes No Don't Know

Additional information:

Given the problems of maintaining grave stones in cemeteries a set of regulations are essential.

Q18 - Alternatively, would the introduction of non-statutory guidance provide a useful option between the current situation where no guidance exists and the introduction of regulations?

Yes No Don't Know

Additional information: There may be a case for both regulations and guidance

Q19 - Are there any reasons why a minimum burial depth of 3 feet from the surface to the top of the coffin should not be implemented? Should there be any exemptions?

Yes No Don't Know

Additional information: To facilitate re-opening graves there may be occasions where this minimum requirement isn't achievable.

Burial and cremation records

Q20 – Do you agree that records and forms relating to burial and cremation in Scotland should be stored and transferred electronically wherever possible? Should any exclusions apply? Should this be applied to all forms of disposing of human remains in Scotland?

Yes No Don't Know

Additional information: There is a good case for maintaining physical hard copies of records as well as date records, to act as a back up in the event of loss of access or complete loss of records through technology failure and to retain the physical record for future scrutiny

Q21 – Should records and forms relating to burial and cremation be kept for 50 years or is it better that they are kept indefinitely?

50 years Indefinitely Other period

Additional information: Records should be kept indefinitely as burials, over time and memorials become heritage in their own right and are frequently researched. The records would be crucial to this research in future. However storage of digital data indefinitely may bring its own challenges and costs as technology changes over time

Alleviating pressure on burial grounds

Q22 - Do you agree that the sale of lairs in perpetuity should be ended?

Yes No Don't Know

Additional information:

Q23 - Does the proposed alternative approach provide a suitable balance between enabling people to buy lairs and safeguarding lairs for the future?

Yes No Don't Know

Additional information:

Q24 - Should there be any restrictions about to whom the owner of a lair can transfer his or her interest? Should this be restricted to family members?

Response: It doesn't need to be restricted to family members, so long as the process is transparent and clear and consistent guidance is provided on line of inheritance to service teams.

Q25 - Do you agree that Burial Authorities should no longer be able to sell multiple lairs or blocks of lairs to an individual?

Yes No Don't Know

Additional information: Local Authorities need to retain the ability to decide on a case by case basis, presale and multiple presale contributes to the Councils budget in the current context but reduces the operational capacity of a cemetery. Factors such as how much operational capacity is available within a cemetery as well as when the plot is likely to be required for use should dictate if the pre sale of land is allowed.

Q26 - The Burial and Cremation Review Group recommended that Burial Authorities may refuse to sell a lair if it believes that it is not for imminent use. How long should constitute 'imminent' in this situation? How could this be tested?

Response: The Scottish Government view is a reasonable one to adopt, i.e., plots to be used within 25 years of purchase.

Q27 – Do you agree with the proposal that full lairs and partially-full and unused lairs should be considered for reuse in certain circumstances with appropriate safeguards in place?

Yes No Don't Know

Additional information: Un-used lairs – Agree with the proposal. Partial lairs- concerns over the proposal and the attractiveness of the proposal to those being offered to share a lair. Full lairs – In addition to the concerns over re use of partial lairs, concerns are also expressed over the practical implications of dig n deepen, including equipment, costs, SEPA ground water requirements amongst other issues

Historic burial liars, particularly those dating from the 18th and 19th century, have archaeological implications which must be addressed before re-use is considered. It is concerning that only designated sites and monuments have been taken into account when considering heritage impacts. Historic Scotland will have a very narrowly focused role in this regard, and this needs to be acknowledged. The major proportion of historic churches and churchyards are, in fact, undesignated and fall under the Local Authority's remit with respect to heritage impacts through statutory planning. Many of these churches, church ruins and churchyards are medieval in origin, and some are known to be older (Early Christian from 6th to 11th centuries AD) but were never designated as such by Historic Scotland or their predecessors. As such Historic Scotland will not have a view on their re-use as it is outside their remit. The re-use of layers in designated or undesignated examples have the potential to disturb buried archaeological and human remains that date from quite early periods and are of regional or national significance. The consultation paper has not sufficiently taken into account the safeguarding of the heritage within the

majority of historic cemeteries in Scotland which are undesignated. This is true for both public and private cemeteries.

In addition, pre 1856 cemeteries will often have no clear lairs, and there will be burials that are not visible through headstones. It is not clear how the Burial Authority will treat pre-existing burials and remains where no clear burial exists. These individual burials are protected by the Right to Sepulchre in Scots Law, and this must be taken into account. This holds for both public and private cemeteries.

The Burial Authorities should seek advice from archaeologists who advise the Local Authorities as well as the national authorities. The Local Authority, as with these national agencies, should be allowed to object on the basis of impacts to significant undesignated heritage. Many historic cemeteries are also of profound interest, or even managed by, local heritage interest groups. They certainly have a vested interest and should also be consulted if their involvement in a cemetery is known.

Q28 - Is a period of 75 years sufficient before reuse of a full lair can be considered?

Yes No Don't Know

Additional information: There are concerns over re-use of full lairs 75 years or older where there are highly likely to be archaeological implications. The Borders contains a significant number in older cemeteries pre-1856. However those concerns aren't the same for newer settlements and cemeteries in the region.

Q29 - Does the initial consultation provide sufficient assurance that relevant specialist interests have been consulted? Should any other specific organisations or groups be consulted at this stage?

Yes No Don't Know

Additional information:

Q30 - Does the process set out allow for sufficient notice to be given that a lair is being proposed for reuse? Should any particular methods of notification be used in addition to those noted?

Yes No Don't Know

Additional information: Notification could be made via local community organisations and networks, such as Community Councils, and religious groups/churches.

Q31 – What can be done to make sure that there are no financial disincentives to opposing to the reuse of a grave?

Response:

Q32 - Other than family members, who should be able to object to the proposed reuse of a lair?

Response: Other interested parties including but not limited to the following, Religious organisations, local residents, friends, affiliated organisations, public health services, SEPA.

Q33 - What considerations should be made to determine whether an objection from a non-family member is legitimate?

Response: It is felt that a non-family member would need to demonstrate that they had valid connection to lair, or that their objection was based on particular and evidenced historical and or cultural reasons.

Q34 - If the Burial Authority decides not to reuse a lair on the basis of an objection from a non-family member, should that person become liable for the maintenance of the lair? If not, should the Burial Authority remain responsible?

Response: The burden of requiring the objector to assume maintenance responsibilities is unclear, greater clarity is required on what mechanism is envisaged to enable this to be pursued.

Q35 - Do you agree that the 'dig and deepen' method should be used to allow the reuse of full lairs?

Yes No Don't Know

Additional information: Dig and deepen has potential for significantly impacting buried archaeology as well as disturbing older burials that have a Right to Sepulchre (raising ethical issues). Safeguards including exclusion, excavation or monitoring to protect or record archaeological assets and buried memorials. SEPA groundwater requirements.

Q36 - Are any other techniques available that should be considered?

Response: Mausoleums, above ground interment

Q37 - Do you agree that headstones and memorials may be reused if appropriate?

Yes No Don't Know

Additional information:

Q38 - Do you agree that headstones and memorials should be removed from lairs if they cannot be made safe? In this instance, what should happen to headstones and memorials that are removed?

Yes No Don't Know

Additional information:

Q39 - Are any other approaches for easing the pressure on burial land suitable for use in Scotland? For example, should above ground mausoleums, similar to those found in Europe, be considered?

Response: Yes Mausoleums, above ground interment

Q40 - Is a period of 25 years sufficient before the use of a partially-full or unused lair can be considered?

Yes No Don't Know

Additional information:

Q41 - Is 12 months long enough to advertise the intended reuse of a full lair or use of a partially-full or unused lair? Where should the Burial Authority's intention be advertised?

Yes No Don't Know

Additional information:

Q42 - Where a Burial Authority intends to reuse a lair having undertaken all appropriate consultations, should it be required to make clear to prospective purchasers that the lair is being reused or is part of a lair that is partly full?

Yes No Don't Know

Additional information:

Q43 - Do the safeguards described provide sufficient reassurance to ensure that lairs are not reused inappropriately? Are any other safeguards required – for example, should the Burial Authority be required to seek a court order to reuse a lair?

Yes No Don't Know

Additional information: No

Q44 - Should certain categories of grave – such as Commonwealth War Graves – be automatically excluded from consideration for reuse?

Yes No Don't Know

Additional information:

Exhumation

Q45 - Do you agree with the proposals to streamline the process for authorising exhumations, including an additionally streamlined process for particular categories of exhumation?

Yes No Don't Know

Additional information:

Q46 - Do you agree with the proposal to provide an alternative process where the purpose of the exhumation is to allow the reuse of a full lair, including that the Burial Authority need not seek specific authorisation once it has carried out specified notifications that it intends to reuse the grave?

Yes No Don't Know

Additional information:

Q47 - Do you agree that authorisation for exhumations should be carried out by the inspector, rather than the Scottish Government?

Yes No Don't Know

Additional information:

Q48 - Do you agree with the proposed approach for the exhumation of cremated remains?

Yes No Don't Know

Additional information:

Pandemics and mass-fatality events

Q49 – Do you agree that the Bill should set out the process for applying for and authorising an exhumation for archaeological purposes? Should any particular issues be taken into account or conditions applied?

Yes No Don't Know

Additional information:

At present it is best practice for exhumation of archaeological remains, including those outside established cemeteries (e.g. ancient cemeteries, chance discoveries of human burials from all periods of history and prehistory, ancient human remains without a clear burial) for both Police Scotland and/or the Local Authority archaeologist to be contacted for consultation and advice. The archaeological input is crucial as the disturbance of ancient or indeed significant historical, burials can contain a wealth of information on the individual who is buried and the society in which they lived. In certain circumstances, exhumation should be undertaken only under archaeological conditions so that the information can be preserved by record. Historic Scotland manages a 'Human Remains Call-off Contract' (an on-call contracted archaeological organisation who can respond to chance discoveries) for this purpose, though this is often over-subscribed and the discovery of just a single ancient cemetery, or many ancient burials within a known cemetery, can significantly impact this budget. While the best practice for both Police and archaeologists to assess and if necessary excavate/exhume a burial is acknowledge, the legislative background for this is not clear as the consultation document suggests. Guidance for governing this process has been produced by the Association of Local Government

Archaeology Advisors for Scotland (ALGAO: Scotland) and was sent to Procurator Fiscals in Scotland. However, regardless of this best practice, human burials of archaeological significance have been destroyed in the past both by the finders and by police where the knowledge of the best practice has been lacking.

There is a need for legal clarity on this issue. However it is considered that the current best practice (Police and archaeological assessment without disturbance, followed by archaeological excavation/exhumation and post-excavation analysis and appropriate reporting) should be enacted as a legal duty for Burial Authorities and Local Authorities. This should apply to planned or unplanned exhumations of burials older than 1856 within or outside cemeteries. We would also welcome formal guidance and training principally for Procurator Fiscals and the police on this issue. In addition, the Human Remains Call-Off Contract administered by Historic Scotland (and soon by the new body Historic Environment Scotland) should be better resourced to meet the challenge of the chance discovery of human burials, or for this resource to be passed to Local Authority archaeological advisory services.

Q50 - Do you agree that the same power to suspend regulations relating to cremation in response to pandemics or other similar incidents should be extended to any relevant burial regulations?

Yes No Don't Know

Additional information: This is a sensible approach

Cremation forms and procedures

Q51 - Do you agree with the principle that a single form should be prescribed for applying for cremations or is it preferable that separate forms should be provided for applying for different categories of cremation? Please set out your reasons for your view.

Yes No Don't Know

Additional information:

Q52 - Do you agree that each of these categories should be provided for in cremation application forms?

Yes No Don't Know

Additional information:

Q53 – Do you agree that Form A should contain these options for any ashes which are recovered?

Yes No Don't Know

Additional information:

Q54 – Do you agree that no cremation which is applied for using Form A should be able to proceed unless the applicant has specified what should happen to the ashes? Do the categories above cover all relevant options or should other options be offered?

Yes No Don't Know

Additional information:

Q55 – Do you agree that Form A should state that it may not be possible to recover ashes after the cremation of a very young child?

Yes No Don't Know

Q56 – Is the process for enabling a person other than the applicant to collect any ashes recovered appropriate? Are the timings proposed suitable?

Yes No Don't Know

Additional information:

Q57 - If ashes are left at the crematorium, how long should be required to elapse before the crematorium can make arrangements to dispose of the ashes?

Response:

Q58 – Do you agree that the application should be countersigned by someone who is not a member of the applicant's family and who is not involved in the arrangements for the cremation? Will this prove impractical? Should the legislation specify categories of people who may countersign cremation application forms?

Yes No Don't Know

Additional information:

Q59 – Should application for other categories of cremation require a countersignature?

Yes No Don't Know

Additional information:

Q60 - Given the similarities between the proposed forms, would a single application form applying to the cremation of people born alive and stillborn babies be appropriate, allowing for specific sections of the form to be completed depending on the kind of cremation? Would separate forms for each category be more appropriate?

Yes No Don't Know

Additional information:

Q61 - What information should be considered essential for the cremation application?

Response:

Q62 - What is the best way to enable Cremation Authorities to undertake this scrutiny? What level of seniority is appropriate for this role? Should the crematorium manager be legally responsible for this scrutiny, even if the actual scrutiny is delegated to a suitably senior member of staff? Should a senior Cremation Authority staff member be required to countersign the form to confirm that all legal requirements have been met?

Response:

Q63 – Is there any need for the introduction of statutory forms for applying for a burial?

Yes No Don't Know

Additional information: Especially if the issue of re-use of burial plots is likely to become law

Pregnancy loss

Q64 – Is a comparable process for the burial of a pregnancy loss of less than 24 weeks gestation required?

Yes No Don't Know

Additional information:

Q65 - Is an alternative process required before the cremation of a pregnancy loss where there is no medical certificate?

Yes No Don't Know

Additional information:

Q66 – Do you agree with these proposals for the form used to seek the mother's agreement to the hospital organising the cremation of a pregnancy loss of less than 24 weeks' notice?

Yes No Don't Know

Additional information:

Q67 - Do you agree with the proposal for who should have the right to instruct the disposal of the remains in the event of a pregnancy loss of less than 24 weeks gestation? If not, in whom should this right be vested?

Yes No Don't Know

Additional information:

Q68 - Do you agree with the proposal to provide a list of people who have the right to instruct the disposal of the remains in the event that the woman is unable to do so? If so, who should be included in this list?

Yes No Don't Know

Additional information:

Q69 – Should there be a maximum time for which a pregnancy loss can be stored by a hospital before it is cremated as part of a shared cremation? How long should this be?

Yes No Don't Know

Additional information:

Q70 – Should the forms for the cremation of a pregnancy loss of less than 24 weeks gestation be statutory? If not, why not?

Yes No Don't Know

Additional information:

Q71 - Should the form used by the hospital to release a pregnancy loss to the mother be statutory?

Yes No Don't Know

Additional information:

Q72 – Should there be a prescribed form for the application for cremation of a pregnancy loss of less than 24 weeks gestation where the cremation is organised by the mother?

Yes No Don't Know

Additional information:

Q73 – Do you agree that the application should be countersigned by someone who is not a member of the applicant's family and who is not involved in the arrangements for the cremation? Will this prove impractical? Should the legislation specify categories of people who may countersign cremation application forms?

Yes No Don't Know

Additional information:

Cremation register

Q74 - Is this list comprehensive? Should any other information be required to be recorded in the Cremation Register?

Yes No Don't Know

Additional information:

Q75 – Does this proposal provide sufficient confidentiality in the case of the cremation of a pregnancy loss?

Yes No Don't Know

Additional information:

Q76 - Are there any reasons why the Cremation Register should not be a public document, assuming that appropriate data protection and confidentiality considerations are in place?

Yes No Don't Know

Additional information:

Q77 - Do you agree that the Cremation Register should be retained indefinitely?

Yes No Don't Know

Additional information:

Accreditation of Cremation Authority staff

Q78 - Should the accreditation requirements described in paragraph 176 be set out in a Code of Practice or in legislation?

Code of Practice Legislation Don't Know

Additional information:

Q79 - How should a person's accreditation be checked? How often should a person's accreditation be checked or renewed?

Response:

Inspector of crematoria

Q80 - Do you agree that the role of Inspector should be responsible for crematoria and cemeteries?

Yes No Don't Know

Additional information:

Q81 – Do you agree that the Inspector should be responsible for particular additional functions, as described? Are there any other functions that the inspector should carry out?

Yes No Don't Know

Additional information:

Q82 - Should there be a formal schedule of inspection to ensure that every Cremation Authority and Burial Authority is inspected at least once during a given period?

Yes No Don't Know

Additional information:

Regulation of the funeral industry

Q83 - Would regulation of the funeral industry be beneficial? What would regulating the industry achieve that cannot be achieved already? What are the disadvantages of regulating the funeral industry?

Yes No Don't Know

Additional information: Complaints relating to the funeral industry are extremely rare, suggesting the market is self regulating and effective. There are existing consumer protection regulations in place already relating to Consumer Protection from Unfair Trading Regulations 2008, covering issues including pricing, aggressive practices and the requirement to provide all material information before being committed to a contract

Q84 - If the funeral industry were to be regulated, what approach would be most useful for Scotland? Do the examples given from other jurisdictions provide useful models, ranging from a fully licensed system to a process of self-regulation?

Yes No Don't Know

Additional information: In the event that regulation is implemented consideration may also be given to existing arrangements for Estates agents. Here operators are legally required to be part of a redress scheme, where failure to register results in a fixed penalty notice. Examples of such a redress scheme include the property ombudsman. Business must have complaints procedures in place which ultimately agree to abide by the decision of the ombudsman.

Q85 - Do you agree that an additional inspector role, separate from the Inspector of Crematoria, would be required to support a regulatory regime?

Yes No Don't Know

Additional information: an alternative may be that through the previously mentioned redress scheme an ombudsman may be an appropriate model to follow.

Funeral poverty

Q86 - Do you agree with the proposal that Local Authorities should have a legal duty to ensure that their up-to-date burial and cremation costs are published on their website in clear and accessible way?

Yes No Don't Know

Additional information:

Q87 - Should Local Authorities be required by law to charge funeral costs on a cost-recovery basis only?

Yes

No

Don't Know

Additional information: it should up to local authorities to take a view on this matter

Q88 - What else could be done to reduce funeral costs and ensure that they remain affordable for everyone?

Response:

Any other relevant issues

Please use this space to provide information about relevant issues which are not covered in the consultation paper or any topic which you think should be considered:

P30 on ID and contamination of bodies – note existing powers and obligations under the Public Health (Scotland) Act 2008.