

Clerk to the Local Government and Regeneration Committee,
Committee Office,
Room T3,40,
Scottish Parliament,
Edinburgh,
EH99 1SP
(sent electronically to lgr.committee@scottish.parliament.uk)

4th December 2015

Dear Sirs,

THE SCOTTISH GOVERNMENT'S LOCAL GOVERNMENT AND REGENERATION COMMITTEE – CALL FOR WRITTEN EVIDENCE BURIAL AND CREMATION (SCOTLAND) BILL.

Thank you for the opportunity to respond to the call for evidence on the Burial and Cremation (Scotland) Bill. Below are our responses to the questions raised by the Committee:

1. Whether proposals for the restoration of lairs are appropriate (sections 25-37)?

As per our response to the consultation on a proposed Bill relating to burial and cremation and other related matter in Scotland, The Co-operative Funeralcare are not supportive of the reuse of occupied lairs in cemeteries. We would support the provisions in the bill for reuse of unused lairs.

2. Whether provisions on the reuse of headstones would be appropriate?

The Co-operative Funeralcare do not feel the reuse of headstones would be appropriate

- a. As we do not support the reuse of lairs
- b. As the headstone is a memorial with emotional value to the bereaved, and could be considered a historic artefact
- c. We do not believe the headstone is the property of the burial authority

3. The appropriateness and extent of the roles which should be undertaken by inspectors of burial, crematorium and funeral directors (primarily Part 4)?

The Co-operative Funeralcare have no specific issues with the roles of inspectors of burial, crematorium and funeral directors as defined in part 4. We do however believe that consideration should be given in the Bill to allowing for any existing inspection regime to be taken into consideration in the event of developing the role of an inspector. As members of the National Association of Funeral Directors, we participate a 2 yearly standards and quality inspection, where adherence to the NAFD Code of Conduct is assured. We also have an internal standards inspection team who check our Funeral Homes annually. Any inspection regime introduced would be best working alongside existing inspections with an audit of reports being more practical than a separate inspection checking exactly the same criteria.



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4. The appropriateness and extent of the proposed regulation of funeral directors (primarily Part 5)?

The Co-operative Funeralcare are concerned that, although we understand from consultation with Scottish Government that regulation would be unlikely to be enforced until the results of any initial inspections are known, the Bill provides for the introduction of licencing for all Funeral Directors premises. We believe this may lead to unnecessary costs for businesses, which in turn could lead to an increase in funeral costs for the bereaved. We understand that Scottish Government have already discussed a sliding scale of license costs for businesses with multiple sites, but this is not currently detailed in the bill.

The Bill does not specify that there should be consultation with funeral directors or their recognised Trade Associations in defining the application, renewal, revocation, fees and timescales. The Co-operative Funeralcare suggest that it would be imperative that there was consultation and as such would request that this should be included in the Bill.

5. The extent to which the Bill will address funeral costs and what, if any, further measures the Bill could contain?

The Bill does not cover funeral costs as such. Proposals for inspection, regulation and licencing of funeral directors, crematoria and burial grounds may add to existing costs for bereaved families arranging funerals.

6. The appropriateness of the removal of existing provisions restricting the proximity of new crematorium to housing?

We are concerned about the removal of regulations around proximity to housing and to highways, as since the introduction of the Cremation Act 1902, this clause has ensured that crematoria have developed into respectful and tranquil places of rest. The removal of this requirement could see a crematorium being built close to major highways and housing, which would remove the air of respectful and quiet contemplation they currently provide the bereaved.

Should you require any further information, please do not hesitate to contact me.

Yours sincerely



Andrew Brown

North Sector Operations Manager



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