



HM Passport
Office

General Register Office

Instructions for Implementation of the Coronavirus (Emergency) Act 2020

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Introduction

The Coronavirus Act 2020 contains a wide range of measures to assist the government in managing the current COVID-19 emergency situation and dealing with deaths which have occurred as a result of the virus.

Responsibility for different aspects of the process after someone dies is spread across a range of government departments. In order to manage deaths effectively, the registration of deaths needs to be considered within the framework of the entire “death to disposal” process. To ensure that deaths can be registered, transmit relevant documents to enable funerals to take place and, importantly, to keep the risk of infection to registration officers as low as possible, new legislation was required. These instructions explain what the provisions set out in the Coronavirus (Emergency) Act 2020 are and how they should be applied.

During the emergency, priority must be given to death certification, registration and disposal processes. Every effort should be made to ensure deaths are registered as soon as possible, ideally within the 5 day target. Issuing certificates to informants or further certificates subsequently is not considered to be priority. Where certificates have been issued please note they should not be sent electronically as this would be in breach of data sharing legislation.

The General Register Office will advise on commencement of these provisions. If you require any further clarity regarding this you should contact your Compliance Officer in the first instance.

Scope

These instructions only apply to the registration of deaths (and still-births) in England and Wales.

The Provisions and Impact On You

Provision - To allow registered medical practitioners to provide an MCCD without having attended the deceased prior to death.

- **If the doctor who attended the person before death is unavailable, another doctor can sign the MCCD for all natural deaths (including Covid-19, see Circular [2/2020](#)).**
- This will only be when the certifying doctor is able to access the deceased’s notes and the information supports a natural death.
- There is still a requirement for the deceased to be seen after death or within 28 days prior to death by a doctor.
- The same MCCD form will be used and amended as necessary.

Impact On You

- **There is no need for the certifying doctor to have attended the deceased during their last illness so unless there is some other reason you do not have to refer the death to the coroner.**
- Additional medical practitioners will be authorised to certify deaths during the emergency. You must ensure that the name of those certifying MCCDs appear on the list of additional doctors appointed.

Provision – To allow local authorities to continue to provide a registration service without the need for face to face contact.

- **If it is no longer possible for the Local Authority to continue to provide facilities for face to face registration, it will be possible for information for a DEATH or STILLBIRTH registration by telephone .**
- With the addition of funeral directors all existing qualified informants will be acceptable for telephone registration.
- If a local authority wishes to register by some other means than telephone e.g. electronically, proposals should be made to GRO before any work is undertaken.
- Birth registration processes and protocols are NOT affected (Please note death registration and the issue of Greens take priority at this time)

Impact On You

- **Guidance re planning for pandemics and issues to consider when registering other than face to face has been provided previously, link below.**
https://gro-extranet.homeoffice.gov.uk/wp-content/uploads/2014/09/Guidance_Notes_for_Flu_Pandemic_for_Practitioners_Sept_20141.pdf
- If undertaking registration work from home, this can only be done via devices provided to you by the local authority and using the usual business email address.
- If you do not have access to a printer, to print the register page, you will have to complete the registration manually although you will still be able to input the information on RON. Advice can be sought from GRO as to your own specific circumstances.
- There will be no need for the register to be signed by the informant in the presence of the registrar. Update RON by recording the full name of the informant followed by the words 'information given by telephone' in space 8.
- A template to provide to the informant for them to collect the necessary information to be supplied to the registrar is at Annex A. The template may be particularly useful if the proposed informant is not a close family member.
- If registering by telephone, you may wish to use the template at Annex B to record the information provided by an informant. This template may be particularly helpful for less-experienced colleagues appointed in response to the Covid-19 emergency.
- Once the registration has been effected it is suggested that a confirmation email is sent to the informant.

Provision – To enable a funeral director, who is working on behalf of the family, to act as informant for the death registration.

- **The provision for a funeral director to act as a qualified informant is in addition to the normal list of qualified informants.**
- It is possible that family members, or others eligible to act as informant, may be ill or otherwise prevented from registering the death.
- A funeral director can only act as informant with the agreement of the deceased's family.
- A funeral director can act as informant, on numerous registrations, and can supply the information for the registration by telephone.

Impact On You

- **It is envisaged that a funeral director may register several deaths in one visit, thereby reducing footfall, risk of contagion and speeding up the registration process. You will need to consider extending appointment times to accommodate multiple registrations.**
- It is suggested that local funeral directors are engaged in discussions in respect of these arrangements. Funeral directors are not obliged to act as an informant.
- Following registration, the necessary certificates for burial or cremation may be issued to the funeral director (where registration has been effected face to face) or sent electronically to the relevant authority.
- A funeral director can, with the agreement of the family, register the death by telephone.
- RON should be updated so that, in the qualification field, 'causing the body' is selected and include details of the funeral director (recording 'funeral director' in the informant's surname field after their surname).
- A template for the funeral director to collect the necessary information to be supplied to the registrar is at Annex B.

Provision – To allow for the necessary documents needed for a death registration to be provided to the registrar by electronic means.

- **During this emergency period documents such as the MCCD and the Green may be completed as normal, scanned (or photographed) and emailed.**
- This will remove the necessity for documents to be posted or hand delivered by personal attendance at a register office or elsewhere.
- This will remove the need for a relative to personally collect a MCCD from the doctor for delivery to the registrar.
- This will remove the need for the delivery of the paperwork, by hand, to the funeral director.

Impact On You

- **You may send, and accept, registration documents integral to the certification, registration and body disposal processes electronically.**
- Transmission of documents should be via email, fax only to be used as an emergency contingency.
- Before initiating transfer of documents by email you should discuss with the other stakeholders i.e. surgeries, hospitals, burial and cremation authorities to agree as to email addresses to be used.
- Emails accompanying MCCD from doctors, should if possible also contain agreed contact details for proposed informants.

Provision – To increase the time period that a doctor had previously seen the deceased, before their death, to 28 days.

- **The time period for the deceased to have been seen by a doctor, prior to death, is extended from 14 to 28 days.**

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- There is still a requirement for the body to be seen after death if they were not seen by a doctor up to 28 days prior to death.
- Currently, the **certifying** doctor needs to see the deceased 14 days before death, or after death. This has now been extended to allow for any doctor to have seen the deceased after death or within 28 days prior to death.
- Video consultation (e.g. Skype) can be accepted for the purposes of 'being seen within 24 days'. However it cannot be used to see the body after death.

Impact On You

- **There will be no requirement to refer a death by natural causes (including Covid-19) to the coroner as long as the deceased was seen by a doctor after death or within the last 28 days of life.**
- Unnatural deaths should still be reported to the coroner for investigation.

For information, other provisions listed below, aim to avoid a potentially significant impact on coroners' workload, local authority run coroner services and other resources, as well as on bereaved families and to reduce delays.

- Permitting cremations to proceed on the basis of one medical certificate (Cremation Form 4), without the requirement to re-examine the body and complete a confirmatory medical certificate (Cremation form 5).
- Removing the requirement for a jury in inquests into deaths which are suspected to have been caused by Covid-19 (although coroners will retain the discretion to hold a jury inquest where they consider this appropriate).

Coroner Involvement

- Deaths in custody will continue to require referral to the coroner.
- In some circumstances, the coroner may decide that an inquest is appropriate. It will be difficult to hold inquests during the peak of a pandemic and inquests may be opened and adjourned until the pandemic period has ended. In these cases, it is likely that death registration will not be able to take place until the coroner completes his inquest. However, the coroner should still be able to provide certification allowing the disposal of the body prior to the inquest.
- Covid-19 is not a reason on its own to refer a death to a coroner under the Coroners and Justice Act 2009.

Still-births

- A still-birth can be registered by telephone.
- Medical certificates and disposal documents can be transmitted electronically.
- There will be no change to the existing provision for a certificate for burial of the still-born child to be issued before registration.

Corrections to Registrations Made During Pandemic

Changes to the ways that information may be provided to registrars during this period may lead to registrations that are incomplete or that contain errors. Errors or omissions in records may eventually become important to bereaved relatives eg in settling the estate of the deceased. Guidance in relation to corrections or re-registrations will be provided at a later date.

Governance Arrangements

Local authorities should explore all planning options as detailed in existing guidance before considering using the provisions. If you wish to implement any of the new provisions you should contact GRO (your Compliance Officer (CO) in the first instance) and inform us as to which provisions you intend to use.

Decisions made will be recorded and audited via governance logs held by the RG.

Annex A - INFORMATION TO BE COLLECTED BY AN INFORMANT IN READINESS TO PROVIDE TO THE REGISTRAR

The following template is intended to help ensure that all the appropriate information is collected and then supplied to the registrar. Please use Annex C for this purpose if the informant is a funeral director working on behalf of the deceased's family.

| Details required | Guidance notes | Deceased details |
|---|---|------------------|
| Date of death | | |
| Place of death | <ul style="list-style-type: none"> This will be the name of the hospital or nursing home, the name or number of the house, the name of the street and village town etc. If the death took place in an ambulance, car etc then you need to provide information about the locality of the vehicle when the death occurred and the intended destination. | |
| Name and surname | <ul style="list-style-type: none"> This should be the name they were known as at the time of his or her death. You should also establish if they are known by any other name currently or previously. You need to record those details together with some notes as to the circumstances to help the registrar ascertain how to record the information in the entry. | |
| Sex | Male or Female | |
| Maiden surname of woman who has married | This is the surname in which a woman contracted her (first) marriage. | |
| Date of birth | Please provide approximate dates if exact date not known. | |
| Place of birth | Town and county/London borough or country of birth and only country if born outside UK. | |
| Occupation | <ul style="list-style-type: none"> Provide as much information as possible relating to the most recent occupation. Please also record whether the deceased was retired. | |
| Usual address | <ul style="list-style-type: none"> This should include the name or number of the house, name of the street and village or town. Where the death occurred in a hospital the deceased's usual address should be recorded. | |

Annex B – INFORMATION TO BE OBTAINED BY THE REGISTRAR TO ASSIST WITH THE DEATH REGISTRATION

The following template is intended to help ensure that all the appropriate information is collected by the Registrar when registering a death.

| Details required | Guidance notes | Deceased details |
|---|---|------------------|
| Date of death | | |
| Place of death | <ul style="list-style-type: none"> This will be the name of the hospital or nursing home, the name or number of the house, the name of the street and village town etc. If the death took place in an ambulance, car etc, you will need further details of the circumstances i.e. the locality of the vehicle when the death occurred and the intended destination. | |
| Name and surname | <ul style="list-style-type: none"> This should be the name they were known as at the time of his or her death. You should also establish if they are known by any other name currently or previously as you will need to ascertain how to record the information in the entry. | |
| Sex | Male or Female | |
| Maiden surname of woman who has married | This is the surname in which a woman contracted her (first) marriage. | |
| Date of birth | Please provide approximate dates if exact date not known. | |
| Place of birth | Town and county/London borough or country of birth and only country if born outside UK. | |
| Occupation | <ul style="list-style-type: none"> Record the most recent occupation. Also record whether the deceased was retired. | |
| Usual address | <ul style="list-style-type: none"> This should include the name or number of the house, name of the street and village or town. Where the death occurred in a hospital the deceased's usual address should be recorded. | |

Annex C - INFORMATION TO BE COLLECTED BY FUNERAL DIRECTOR IN READINESS TO PROVIDE TO THE REGISTRAR

The following template is intended to help ensure that all the appropriate information is collected and then supplied to the registrar.

| Details required | Guidance notes | Deceased details |
|---|--|------------------|
| Date of death | | |
| Place of death | <ul style="list-style-type: none"> This will be the name of the hospital or nursing home, the name or number of the house, the name of the street and village town etc. If the death took place in an ambulance, car etc then please record further details re the locality of the vehicle when the death occurred and the intended destination. | |
| Name and surname | <ul style="list-style-type: none"> This should be the name they were known as at the time of his or her death. You should also establish if they are known by any other name currently or previously. These too should be recorded with some notes as to the circumstances to help the registrar ascertain how to record the information in the entry. | |
| Sex | Male or Female | |
| Maiden surname of woman who has married | This is the surname in which a woman contracted her (first) marriage. | |
| Date of birth | Please provide approximate dates if exact date not known. | |
| Place of birth | Town and county/London borough or country of birth and only country if born outside UK. | |
| Occupation | <ul style="list-style-type: none"> Please provide as much information as possible relating to the most recent occupation. Please also record whether the deceased was retired. | |
| Usual address | <ul style="list-style-type: none"> This should include the name or number of the house, name of the street and village or town. Where the death occurred in a hospital the deceased's usual address should be recorded. | |

Q&As

Q. Can information for a death or still-birth registration be given over the telephone?

A. Yes – where your local authority has decided to provide this service.

Q. Do I need to advise GRO if my district wishes to provide a telephone registration service?

A. Yes – you should contact your Compliance Officer in the first instance as GRO will need to be aware of the take up of these provisions country wide.

Q. The informant needs an interpreter. Who can I accept?

A. The same rules apply to registration information given even when not 'face to face' ie anyone can act as interpreter provided they are competent enough to give information. You may need to show some flexibility where a younger family member is the proposed informant. Make a pencil note in the margin to indicate that an interpreter was used adding their name and relationship to informant.

Q. Information for the registration has been given by telephone. What do I record for the signature?

A. Record the name of the informant followed by the words 'information given by telephone' in space 8.

Q. If information is given by telephone what do I do about issue of the BD8?

A. DWP notifications are lower priority than registering deaths and can be picked up when possible. Notification will still go to DWP via RON.

Q. Do I need to notify other organisations by sending form 111 or certified copy of entry as soon as death is registered?

A. Returns are a lower priority than registering deaths and will be subject to local pressures of work. A system will be needed to ensure these are picked up when possible.

Q. I have received an MCCD from someone other than the usual, local GP – is this cause for concern?

A. Not necessarily - additional medical practitioners will be appointed. You must ensure that the doctor's name appears on any list of additional persons authorised to certify deaths during the Covid-19 emergency.

Q. The MCCD I have been given shows that the medical practitioner had not seen the deceased for 20 days prior to their death. Should I refer the death to the coroner?

A. No - the legal requirement to refer a death to a coroner when the medical practitioner has not seen the deceased within 14 days of their death has been extended to 28 days.

Q. I have been approached by a funeral director wishing to act as qualified informant to register a non-Covid-19 death – is this ok?

A. Yes – the list of those who may act as qualified informant is extended to include a funeral director when authorised by the deceased's family to act on their behalf. Funeral directors can act as informants in the usual way.

Q. I will be self-isolating but working from home – can I use my own laptop and email address for registration purposes?

A. No – any device used must be supplied by the local authority and you should use your usual business email address and NOT your personal email.

Q. Can I hold a book of disposal certificates (Greens) at home?

A. Yes – if you are working from home it is permissible for you to hold a book. The certificates, blank and completed, should be held as securely as possible until they can be returned to the office.

Q. Should I continue to capture the usual statistical information at registration – would funeral directors or others informing who are less close to the deceased be able to provide the required information anyway?

A. Yes – although there may be circumstances where the informant may not be aware of all the relevant information. Lack of statistical information is not a reason to delay the registration.

Q. Do we have to use all of the new provisions or can we pick and choose what works best for our local authority?

A. You do not have to use any/all of the provisions if you do not need to, business as usual should be maintained as long as possible. If your local authority wishes to 'switch on' or 'switch off' any of the provisions they must contact your Compliance Officer in the first instance. Ultimately, the Registrar General has responsibility for authorising individual districts/area to use the new provisions.