



Notes on Bereavement processes

Public Data review

Introduction

Dealing with bereavement is complex, with many in society facing this at some point. Interacting with companies to administer the estate of one who has passed can become a complex process with customers interacting with companies for the first time, at a time of distress, and when the policies and processes may not be clear. Although many people deal with post-bereavement administration, for many it is not something that is done frequently – however, this presents an additional challenge for companies as again, these customers face a steep learning curve at an emotionally challenging time.

It is therefore important that companies give thought on how to effectively manage these interactions, aiming to streamline and simplify the process as far as possible, whilst maintaining the right level of security checks and safeguards to prevent misuse and exploitation and protecting their staff wherever possible.

This set of notes is intended to serve as a discussion starter with points to consider for interested organisations. It does not intend to set out or define what would be right in all cases, but simply to try and represent a range of views on the topic. We have attempted to collate views on best practice in this area from a range of stakeholders, based on publicly available information supported by our views on customer experience.

In this, we take data and publications from:

✓ The FCA

✓ The Financial ombudsman

✓ Charities and campaigning organisations

✓ Other stakeholders (Death Notification Service)

✓ Publicly available data from online review sites



View from FCA statements / publications

The FCA is increasing focus on this issue and has already identified several areas of concern in the way that Bereavement is handled by businesses. From publications and statements, we have identified several key themes and added them into three groups:

Process

✔ Good Practice Examples

Some firms demonstrated strong policies, proactive use of data, and clear procedures that helped identify and support vulnerable customers effectively.

✔ Consumer Duty Compliance

The review is part of the FCA's broader work under the Consumer Duty, which requires firms to deliver good outcomes for all customers, including those in vulnerable circumstances.

✔ Need for Adaptability

The FCA emphasised that firms must be adaptable and put consumer needs at the forefront, especially during emotionally difficult times like bereavement.

✔ Access to Essential Funds

In some cases, individuals were unable to access funds needed to pay bills due to procedural inefficiencies or lack of clarity.

Resource

✔ Inconsistent Staff Knowledge

Staff in some firms were unclear about what actions to take and how quickly, leading to delays and confusion for bereaved customers and PoA representatives

✔ Governance and Monitoring Gaps

Firms need to improve how they measure and monitor customer outcomes, especially for bereaved individuals and PoA cases.

Emotion & Experience

✔ Emergency Support Failures

Customers experiencing emergencies (e.g. mental health crises) struggled to get timely support, exacerbating their distress.

Summary of FCA Statements

The FCA focuses strongly on the business process compliance, as would be expected, but it is worth calling out the stated need for flexibility as a key part of an effective process. The link between Consumer Duty outcomes and effectively handling other elements of related vulnerability, such as access to emergency funds, adds weight to this important scenario and emphasises that businesses need to have a range of options to support customers at this time. Despite the focus, they also appear to recognise that there are good processes in place in many organisations and this aspect should not be lost.

The key question for stakeholders looking to improve in this area is how to enable those flexible processes whilst maintaining the safeguards that are required. The FCA also recognise the importance of proactive data use, which could include identification of customer vulnerabilities, or connections to proactive notification services in the context of bereavement.

View from data supplied by the Financial ombudsman

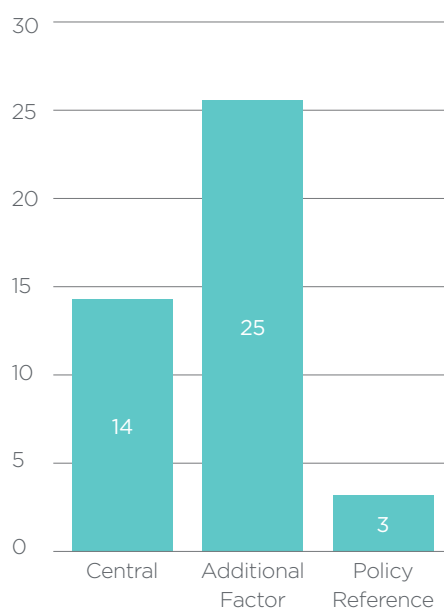
To gauge the impact of bereavement from this perspective, we undertook a search for references to “bereavement” in the published resolutions from the financial ombudsman service. Overall, 43 cases were reviewed, with publication dates between 01-JUL 2025 and 09-SEP 2025. We assessed each one to see if the complaint was upheld, and to judge the centrality of bereavement on the case. Several matches for the search on “Bereavement” returned policy references in the response (e.g. “...As this is only available under the bereavement policy which did not apply here...”) and these are excluded additional analysis.

Bereavement was judged to be central to the complaint where references to “dealing with an estate” were found. One key takeaway from this is that it was often noted as an additional factor in complaints, for example when a customer mentioned that they were dealing with a family bereavement and this left them vulnerable to other circumstances.

43

cases were reviewed

Bereavement reference type in all reviewed covmplaints



This emphasises the importance of noting mentions to bereavement made by customers in general service calls and ensuring that these references are tracked and actioned. Supporting customers with bereavement extends beyond direct interaction with them when administering an estate.



In these examples, bereavement was an additional factor noted in the resolution, but in both cases the organisations had good and robust procedures in place, hence the complaints were not upheld.

DRN-5745479

Miss W complained about how Vanquis Bank treated her in relation to her credit card account after she got into financial difficulty following ill health and a bereavement. The complaint was not upheld as the Financial ombudsman Service found that Vanquis had acted appropriately and had attempted to assist Miss W.

DRN-5673509

Mrs A complained about the termination of her agreement and repossession of her car. The complaint was not upheld as Santander acted reasonably in the circumstances, including multiple attempts to contact her and offering support.

The overall rate of complaints upheld where bereavement was a central factor was low, but there are some clear examples of poor practice, and some resulted in the ombudsman finding in favour of the customer:

DRN-5781838

Miss W complained that Barclays Bank UK PLC provided copies of joint account statements she held with her late mother to her sister, without her consent, and changed the address on these accounts to her sister's address. The complaint was upheld, and Barclays was directed to pay £600 compensation for the distress and inconvenience caused.

DRN-5484803

The estate of Ms. S complained that NS&I caused a delay in the settlement of the estate and communicated poorly. The complaint was upheld. The Ombudsman concluded that NS&I should compensate the estate £250 for the inconvenience caused. The Ombudsman found that NS&I's bereavement team was not customer-facing and that the estate experienced significant delays and poor communication.

For many of the cases we reviewed, the complaint was not upheld, mainly because the organisation had already addressed the issue and the Ombudsman found the compensation offered to be fair and reasonable.

That customers go on to escalate the complaint to the ombudsman emphasises the importance of these issues with customers and it is therefore important that organisations convey the importance they also attach to compensation for these issues. Key examples include:

DRN-5792781

The estate of Mrs K complained that IWeb delayed processing their instructions to sell the underlying investments held within her portfolio. The complaint was not upheld as IWeb followed their bereavement policy and acted promptly.

DRN-5260463

The estate of Mrs J complained about delays in executing an ISA transfer and poor customer service. The complaint was not upheld as the estate was not entitled to claim distress and inconvenience, and HBOS's offer to pay 8% interest was considered fair.

DRN-5572000

The estate of Mrs S complained about delays and loss of interest due to Goldman Sachs' handling of the account closure and fund transfer. The complaint was not upheld as the estate did not suffer financial loss, and Goldman Sachs' offer of £100 as a goodwill gesture was considered reasonable.

DRN-5258918

Mrs. C complained on behalf of the late Mr. C's Estate that Lloyds Bank PLC lost documents relating to her late father's investments. She believed Lloyds had lost her father's life assurance policy documents. The complaint was not upheld. The Ombudsman concluded that Lloyds had not asked Mrs. C to return the documents and that they were not received by Lloyds. The documents were sent to an incorrect address and signed for at a Royal Mail sorting office. Lloyds provided Mrs. C with contact details for Royal Mail and offered compensation for the service issues experienced. The Ombudsman found no evidence that Lloyds requested the documents back or provided an incorrect address for their return.

DRN-5721454

The estate of Mrs C complained that NS&I only refunded £1 for a £2 bond and provided incorrect information. The complaint was not upheld as NS&I provided evidence that the £2 bond was not owned by Mrs C, and the £1 bond had not won any prizes.

DRN-5628544

Mr R complained about RBS's handling of his late mother's accounts, including unauthorized transactions and delays in closing the accounts. The complaint was not upheld as RBS followed its procedures correctly.

DRN-5649935

Mr N, as executor of the estate of Mrs L, complained that TSB released monies to Ms C without verifying her authority. The complaint was not upheld as TSB followed the correct process based on the bereavement form signed by Ms C.

DRN-5599421

Mrs W complained about the handling of her late husband's credit card account. The complaint was not upheld as the compensation provided by Barclaycard was deemed fair and reasonable.

Ombudsman Data Summary

The review of data available from the ombudsman indicates that businesses do have robust processes in place to handle these issues, but there are still cases where the customers fall between gaps in them. Bereavement was noted as an additional factor in many of the complaints and this emphasises the importance of flagging any references to this and acting early to ensure support. Finally, it is important not to underestimate the strength of feeling that dealing with Bereavement matters elicits.

The fact that so many of the complaints were deemed to be adequately handled by the internal policy and yet the customer still felt unsatisfied with the resolution is a key point to address in reducing the level of escalation seen with these.



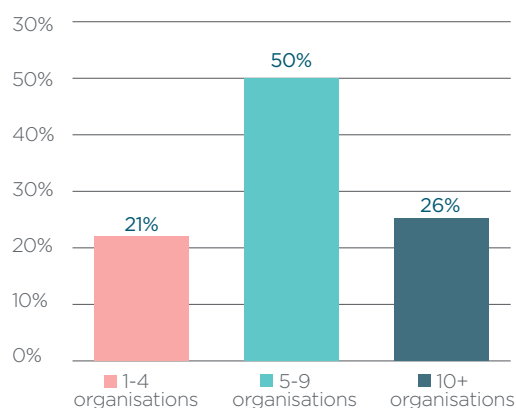
View from charities

To widen the view, Davies have undertaken a brief review of how charities and campaigning organisations have addressed this issue. Whilst of importance to many charities, Marie Curie ran a large campaign on this issue in 2024, under the banner of “Making Sadmin Simple”

“Sadmin” is a portmanteau of “Sad” and “Admin” and used to describe the administrative tasks a person must complete to tie up their loved ones’ affairs following a bereavement, or to get their own affairs in order following a diagnosis of a terminal illness

Within the documents supporting this campaign, we have identified several key points to consider. Firstly, most customers completing Sadmin have to contact 5 or more organisations. As these are organisations that the deceased person dealt with, there is also a good chance that the person undertaking this task does not have an existing relationship with those organisations. There are therefore unlikely to be familiar with the operating procedures, and this may be the only interaction with this organisation for that person, shaping their impression of the company at this time of crisis.

Number of organisations to notify of the death



Source: Marie Curie Opinium polling, November 2023

Further data suggests that overall, 61% of people report having difficulties with the bereavement processes they have to navigate with companies, and overall, this may represent over 680,000 people per year. Key issues flagged in the process include:

Complexity of processes and a lack of ownership from the company. 31% of people surveyed reported having to talk to more than five individuals at an organisation, with around 5% needing to talk to at least ten

31%

Had to speak with more than five individuals

Correspondence addressed to the deceased person was still received and whilst there is acceptance that items may have been issued immediately before company was notified, 16% of surveyed individuals continued to receive post four weeks after the notification, and this continued for up to six months in some cases

16%

Continued to receive post four weeks after notification

The time to resolve these matters is felt by customers to be excessively long, with 28% of respondents reporting that it took at least seven months to close accounts. 10% of bereaved people are not able to close all the accounts within a year. This inevitably leads to significant frustration on the part of the customer.

28%

Customers waited at least 7 months to close accounts

Finally, customers felt that in some cases the people they spoke to did not properly acknowledge the emotion of the situation, with a lack of tact compounding an already complex situation. In addition, staff appeared to be unclear on processes or next steps, which frustrated customer efforts to resolve the problem

Example Quotes:

“

[I am] Constantly chasing things up because they didn't happen in the time frame given.”

The slowness of companies to pay refunds to the estate or transfer pensions- still waiting 9 months later

18 months later, I still haven't sorted out financial affairs - life insurance, TPS pension ... there are forms to fill in that I just can't get my head around. It's like a foreign language to me. And I'm trying to navigate it on my own. Very stressed about it.”

”

Key suggestions from Marie Curie

1. Introduce a proactive account transfer system to enable customers to nominate a trusted person to manage their account with smooth transfer through bereavement

- ✓ Businesses should implement a system which enables customers to easily transfer their account to a pre-chosen, named individual in the case of terminal illness/death.

2. Provide accessible guidance on death administration processes

- ✓ Organisations should publish a death notification guide with clear contact details, guidance on requirements, and stages of notification and timescales.
- ✓ Companies should provide clearer information and communications about the processes that need to take place after reporting a death.

3. Follow a standard list of required documents for death notification

- ✓ Organisations should agree to a standardised (and minimal) list of documents customers are required to submit for death notification.
- ✓ This list could be tailored to different sectors/industries.

4. Allow death certificates to be submitted online

- ✓ Organisations should allow online upload of documents such as death certificates and not rely on paper copies and the post.
- ✓ People reported having to send off documents in the post and it added extra hassle and expense of having to obtain multiple copies of the death certificate.

5. Invest in a trained bereavement team

- ✓ A trained bereavement team (and phone line) should be created who coordinates the necessary transfer of information between departments and can provide advice and empathy on the situation.
- ✓ Ideally this should require only one contact, or there should be continuity of contact throughout the process.

6. Ensure no correspondence is sent to the person who died

- ✓ No post should be sent to the deceased two weeks after notification of a death. From the point of notification of a death, records should be immediately updated so that post is not sent out addressed to the person who died.

7. Extend the Tell Us Once service

- ✓ Governments across the UK must conduct a review of the flow of information from death registration to relevant public bodies and industry, including the feasibility of extending the remit of Tell Us Once.

Marie Curie reference possible extensions to the “Tell Us Once” service provided by the government, where a single notification is circulated to multiple government departments in order to start the process of concluding someone's affairs. We believe that this is an important option to explore, as it would allow companies to move to a proactive service model for dealing with this.

Summary

This report highlights the level and complexity of completing this kind of administration, with most customers contacting more than five organisations and needing to speak to more than five people in each, this level of demand quickly ramps up, even if in comparison to other customer service contacts it is small in absolute terms. However, for an individual at a difficult time, this is a significant level of contact to maintain. It is possible that organisations have, thus far, focussed on their own processes with less thought on the overall experience for the customer who is going through this with other organisations in parallel.

The recommendations flagged by Marie Curie all seem to be reasonable and reflect current industry trends towards online/self-service and more streamlined processes, so we recommend that businesses align

to this where possible. Of note is that there is some appetite for people to support this with an online process; it is possible that businesses have shied away from providing these processes online with the expectation that customers want a personal touch – but in some cases, that online element makes the whole job easier and quicker. As always, a balance is key.

It's also important to remember that there will be a number of people for whom their first interaction with your company will be undertaking this unpleasant task during a time of significant personal distress. For companies, it may be a chance to create an impression with that company which will last, but currently, it seems that too many customers leave with a bad impression.



Case Study

Earlier in 2025 Davies were part of a panel of judges for an award, focusing on best practice within contact centres. One entry which stood out to our judge was from a bank, who had identified an issue with how they handled the Power of Attorney process within the business. There are several aspects of this scenario which have been raised here, including a general lack of awareness with the staff, and reliance on a small number of in-branch staff to complete the process. This was generating complaints to the bank, and they were having to pay out redress, typically of £75 per case.

£75

Typical Redress Paid Per Case

The team started with complaints data to understand the root causes, leading to the identification of key points in the customer journey which needed improvement. Core to this was expanding the ability of more staff to handle the process, so the training was improved to support this. They also published their process and made it a lot clearer, so that it was simpler for customers to follow the process, there were also fewer wasted conversations where the customer did not have the right documentation in place. The number of applications that were rejected from their process fell from 30% to 11%, meaning that they were able to get it right first time for customers more frequently, improving the experience and reducing the cost to handle. They also saw an increased attach rate from these customers after the PoA process had completed.

This case study illustrates the benefits of fully reviewing this process and basing the decisions on rigorous data analysis. They delivered a significant reduction in complaints, increased customer satisfaction and an improved long-term attach rate.

↓ 11%

Rejection rate reduced from 30%

The Death Notification Service

The "Tell Us Once" service from the Government has been referenced several times as a sensible approach to effective data sharing in these situations. It reduces the amount of contact the government departments handle and removes the need for individuals to repeatedly cover potentially upsetting details.

We are aware of a similar scheme for private companies, the Death notification Service. Its member companies will receive a notification from it that a person has passed away, allowing them to start the relevant procedures. It also means that customers need only provide evidence one time, which can then be used in multiple cases. This reduces the administrative burden for both companies and individuals. Moving towards this process also supports trends seen in the industry towards proactive customer service. It also helps companies ensure that customers are in the right process, which should reduce the scope for errors.

Finally, there is a real possibility that executors of an estate will not know all the institutions that a deceased person had dealings with. This relies on the deceased person keeping records, which may not always be the case. Expanded use of a scheme like this will help identify dormant accounts and give executors some confidence that they have fully dealt with all the assets of the deceased..

Death Notification Service Summary

The DNS is run by Equinity and the membership criteria are (currently) unclear, but some sort of scheme with broad backing and a level of promotion will help organisations manage customers in this process more effectively. Avoiding fragmentation or competing schemes is key to the success of this approach. Currently, whilst many organisations are members of it, there are still significant gaps so from a customer perspective, it only goes a part of the way to resolving the issue. Closing that gap by either joining the existing service or establishing a new, definitive one is key to success. Connecting to the existing Tell Us Once service would improve this yet further, reducing the amount of administration required by executors, reducing exposure to dormant accounts and helping institutions resolve these cases quickly and efficiently.

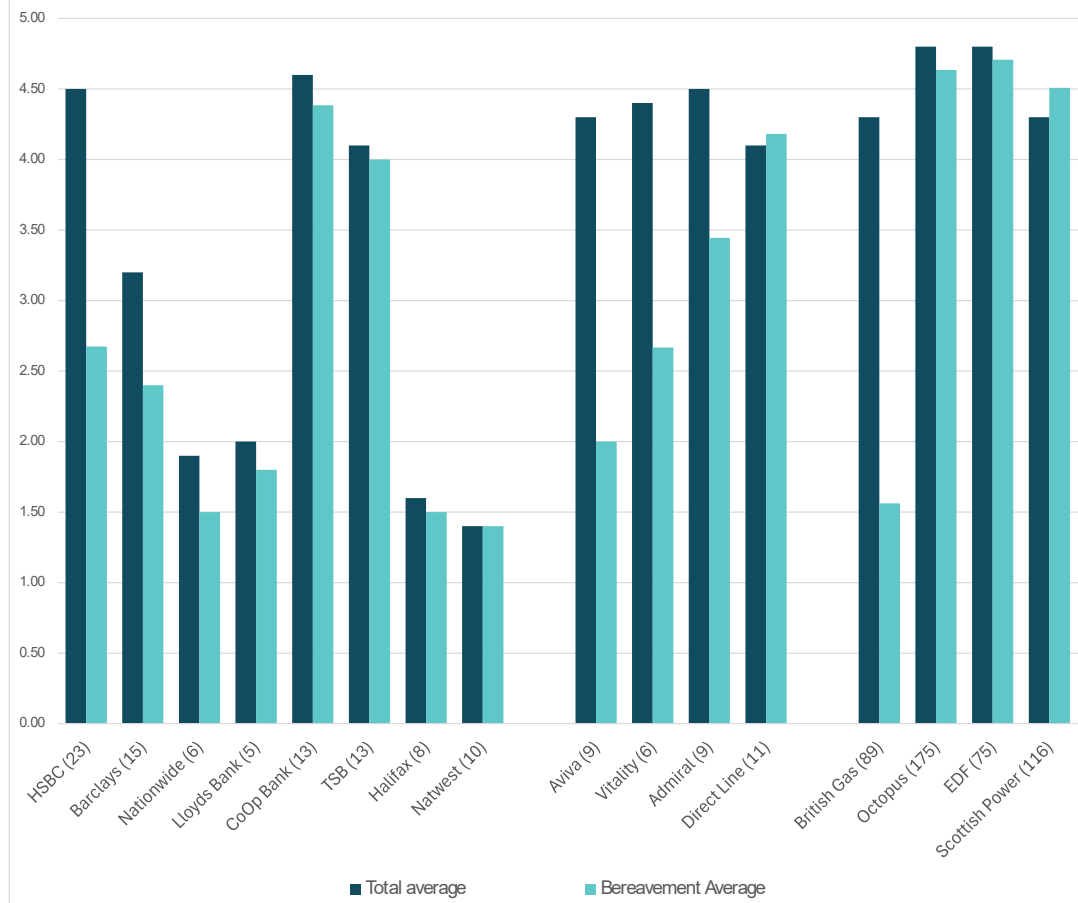
View from public review data

To add more context to this document, Davies have undertaken a brief review of public-forum data from members of the public. We searched online for references to bereavements and customer experiences and accessed a range of sites to draw high level conclusions.

First, we captured data from TrustPilot, which reviews organisations on a scale of 1-5. We captured the overall scores for a selection of banks, insurance companies and energy providers and compared those scores to the scores for

reviews mentioning bereavement. It's worth noting that this sample is self-selecting, some companies encourage customers to post reviews here, others do not. We ignored any company who had fewer than 5 reviews mentioning bereavement in the last 12 months. Bereavement-related reviews are also included in the main score, but the low number of bereavement specific reviews means this will have a minimal impact on the overall number. The number attached to each name represents the number of reviews mentioning bereavement which were included – some of these organisations have a low review rate for this

Chart Trust Pilot score breakdown: Company typical score vs. Score for reviews mentioning Bereavement



There are several observations on this data:

1. Generally, banks perform poorly on this measure. Customer perceptions in general are low and although this is a self-selecting sample, some banks clearly perform worse than others. Three groups of banks stand out

- ✓ HSBC have generally positive reviews on the site, but there is an enormous gap when looking at the reviews mentioning bereavement
- ✓ Nationwide, Lloyds, Halifax and Natwest all have poor scores generally and perform equally poorly when dealing with bereavement
- ✓ TSB and CoOp bank stand out as not only having high scores in general, but largely maintaining these when dealing with bereavement

2. Insurance companies show generally good scores for overall experience, much higher and more consistent than banks. However, there is a range in how well they can maintain this when dealing with bereavement. It's important to note that we have not made allowances for different types of insurance in this analysis (e.g. Health, Life, Home and Motor)

3. Utility companies generally have a high level of customer satisfaction on the site, and most seem to maintain this in dealing with bereavement

In summary, banks seem to have a specific problem in dealing with bereavement in most cases. A few are able to show good service and maintain this in the bereavement scenario, but most others either show a significant gap in the quality of service between BAU operations and dealing with bereavement. Other industry sectors, particularly energy seem to be able to maintain this much more effectively. Whilst each of these groups of companies operate in different regulatory scenarios, it's important to recognise that customers going through the bereavement process are likely to contact one or more from each and so a holistic view is useful.



Summary of key points

1. Process

- ✓ Lots of the processes that business have in place are good processes and often meet the requirements of customers. This is evidenced by recognition from the FCA and in the FoS complaints not upheld as the company followed their process and it was deemed reasonable. That complaints are still generated following this suggests that there is a lack of alignment between customers, regulators and businesses in terms of what is expected. This gap needs to be understood and closed to minimise customer complaints.
- ✓ It is possible that businesses are not looking at the whole experience for each customer, and focussing only on their part of it. This leads to a complex/disjointed experience. As most executors need to contact over 5 different organisations, the experience from the customer perspective can be very different. Whilst businesses can only directly control their own processes, any alignment across businesses will make it easier for customers to navigate the whole process.
- ✓ A centralised notification service will make this administration a lot simpler from the customer perspective – a centralised platform such as the Death Notification Service or Tell us Once brings efficiencies and experience improvements for both parties, so this should be investigated, established and promoted. Currently, there are several notification services, but fragmentation here is a risk to maximising the utility of such an approach. Further, the risk of fraudulent operators, or customer suspicion of fraudulent operators may also be an inhibitor to adoption. Therefore, a well-respected, official location for this is likely the best solution.
- ✓ Businesses need to ensure that their process can handle the bulk of scenarios which are likely BAU and that it has clear & easy opt-outs for the complex edge cases. Don't be afraid of putting this process through self-service as an option. Evidence suggests that customers are happy to use these self-service options (of which single-notification services are a version) where it is appropriate. Not all people process grief in the same way and so the process to handle these contacts optimally will vary too. Customer choice is key. Small changes to existing policies (such as assuring continuity of payment for utility bills) may help to improve the customer experience for minimal business impact – it's about reassurance & stability in a time of change
- ✓ Related to this, there is recognition that the proactive use of data is a good option to explore. The Death Notification Service-type data is an example of this, other data points will be available depending on the company and the technology deployed. Use all the available data that companies have in order to support people in vulnerable circumstances, ensure it is logged correctly and actioned

appropriately. FoS complaints related to bereavement often recognise that a bereavement was an aggravating factor for the customer, even if the problem they are raising is not directly related to the death. Do not underestimate the importance of bereavement vulnerability and its impact on the ability of customers to make the best decisions.

2. Resource

- ✓ Resource the teams who are specialised in handling these contacts and ensure they are supported in dealing with these issues in terms of both a good business process and support materials for their wellbeing so that they can deliver excellent customer service in the longer term.
- ✓ Ensure good, basic awareness across the business for the process at a high level. Ensure that all staff are able to respond with the correct emotional tone in this situation, be particularly aware when there is a demographic/life stage gap between the agents and customers – where a young agent with limited life experience has to deal with an older customer experiencing bereavement, there can sometimes be a gap. Use training to address this.

3. Emotion & Experience

- ✓ Don't underestimate the strength of feeling generated in these cases, even when a business process recognises a mistake and compensates the customer, they often still seem upset by it – why is this the case? There is a gap in expectation which needs to be understood and closed
- ✓ Recognise that you are potentially talking to people for the first time, at a time of emotional distress & confusion. This may be the one chance you have to make a lasting impression on that person. There is evidence that a good customer experience in these critical moments have impacts on long-term customer perception & behaviour to the company outside of any bereavement process so investment in these processes will yield wider benefits beyond regulatory compliance with improved attach rates available to organisations who get it right.



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