

LOCAL AUTHORITIES AND HEIR HUNTERS

EXPOSING THE OPAQUE AND
UNCOMPETITIVE PRACTICES THAT
LEAD TO CONSUMER EXPLOITATION
AND INHERITANCE ERRORS

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Executive Summary

- Where local authorities assume the responsibility for a public health funeral (commonly known as a pauper's funeral) because a deceased person has no known relatives and has left no will, they are increasingly engaging in opaque and uncompetitive practices to identify next-of-kin, resulting in consumer exploitation and inheritance errors.
- Rather than having the deceased's name publicly listed with the Bona Vacantia Division (BVD, part of the Government's Legal Department) potentially for next-of-kin to see, or, failing that, where a large number of genealogy firms will take notice and undertake research to identify next-of-kin – thus ensuring competitive prices and an accurate result - there is a growing practice of local authorities to refer cases exclusively to their preferred 'heir hunter'.
- This is contrary to the procedure set out in the Government's policy.
- Without competition, firms can charge any price they like, safe in the knowledge that no other firm will undercut them. This is resulting in them charging 10%-15% and more in fees (33% in some cases) when they have exclusive referrals, compared to cases on the open market where competition drives fees down to 2%-5%.
- This can often amount to a £30,000 income from an estate worth £200,000. However, a recent example of an heir hunter's fee of £114,000 being earned from a £285,000 estate is not untypical. Meanwhile, relatives are unaware that they are being ripped off because they will not hear from any other researchers.
- A lack of competition has also led to inheritances being wrongly awarded.
- Anglia Research is one of the largest professional probate genealogy and heir location firms in the UK, employing the highest number of accredited genealogists and legally qualified, independently regulated staff. It has published a report on the increasing prevalence of these practices based on a large number of FOI responses from local authorities supplemented by other correspondence and research.
- It is calling for local authorities to follow the correct procedure and refer all intestate deaths to the BVD (or the appropriate lawyers in the case of the Duchy of Cornwall or Lancaster) in order to protect the next of kin.
- Where cases are unable to be referred, we have proposed a Code of Practice to ensure there is competition and greater protection for next-of-kin. We are calling on local authorities to adopt this and for the Government to issue guidelines to councils to use it or something similar.

Anglia Research

Anglia Research is a highly respected probate genealogy and heir location firm. Not only is it one of the largest such firms, but it employs more accredited genealogists and legally qualified staff (with independent regulation) than any other UK probate research company. It prides itself on its reputation for thoroughness and integrity.

The firm has produced a report on the increasing practice of local authorities to use 'heir hunters' where they need to conduct a public health funeral (commonly known as a pauper's funeral) and where there is no will and next-of-kin are unknown. The report is based on FOI responses from all local authorities in England & Wales, supplemented by other correspondence and research. The report also covers other areas of local authority responsibility where heir hunters have discovered that officers have early knowledge of deaths of intestate people.

Genealogy and Heir Location Firms

The business of genealogy and heir location firms is to undertake probate research to locate rightful heirs of unclaimed inheritance assets or to trace a missing or unclaimed inheritance.

They work speculatively, investing their own resources. All their research on a particular case is individually tailored to the relatives of one person who has died intestate.

A level of fees, which is invariably a percentage each beneficiary's due share of any estate successfully claimed, is agreed with the aspiring claimant beforehand. The fees are only due when the inheritance assets have been successfully claimed.

The sector is not officially regulated. The firms range from those who are entirely unregulated and unaccredited to those who have obtained relevant academic or professional qualifications and impose a level of accountability upon themselves by registering with external independent organisations in order to provide clients with a degree of protection. Setting aside organisations that are devised by heir hunters themselves or those that anyone can join simply by paying a fee, there is just one professional association that provides genealogical accreditation based on rigorous assessment in England and Wales - the Association of Genealogists and Researchers in Archives (AGRA).

The Professional Paralegal Register (PPR) acts as both a register and a regulator for professional paralegals. It is currently the only professional body available to probate researchers that has access to an independent complaints procedure and compensation scheme.

Background

Local authorities have statutory responsibilities for public health funerals where people have died intestate and have no known relatives to arrange or pay for their funeral.

When someone dies with no apparent relatives it generally falls to council officers to enter the deceased's property in order to assess whether there is an estate of value and to safeguard cash, bank cards and anything else of value. It is at this point that they will look for a will and for any evidence of relatives which might be learnt from neighbours, discovered among the deceased's possessions, be in the council's own documentation or through liaison with other service providers. This would include care home staff, social workers or hospital or hospice bereavement officers, all of whom are likely to have notice of relatives and friends.

When council officers find no evidence of the existence of next of kin from information in their own records or among the possessions of the deceased, in England and Wales government policy is that

where the assets left are above £500, estates should be referred to the Bona Vacantia Division (BVD) of the Government Legal Department (GLD). In the case of those areas covered by the Duchies of Lancaster and Cornwall, the referral is made to the law firm, Farrer and Co.

According to GLD's guidelines, the local authority should refer cases as soon as possible after the death. Once the referral has been received, the name of the deceased is openly advertised by BVD on the 'Unclaimed Estates' list and website to enable executors or kin to come forward.

In referring a case to BVD, a local authority is not asked to and does not vouch that an estate is genuinely bona vacantia or ownerless, but rather that it is presumed to be. It is the role of BVD to verify the truth of the matter by inviting potential entitled kin to submit their evidence.

BVD will assess and admit the first correct fully documented claim they receive and the claimant can then apply for a grant of letters of administration.

As well as the public being able to scan the list for any possible relations who have died, probate genealogy and heir location firms (aka heir hunters) are constantly monitoring it. Typically, they will undertake preliminary investigations to trace the next of kin of those deceased. Having found one or more next of kin, they will approach them to enquire if they would like to appoint the firm to represent their interests and make a claim on their behalf. The firm will ask for a percentage fee of any share of the estate recovered for the claimant, with no fee payable if the claim is unsuccessful.

Given that there are around fifteen properly constituted firms in the UK (and very many sole operators), this is a very competitive environment and several firms may offer their services to the same next-of-kin enabling them to choose on price and quality of service. This competition ensures that "finders fees" average about 5% or less on straightforward cases.

Claims to a deceased's estate will be accepted by BVD up to 12 years from the date of death, in line with the 1980 Limitation Act. Thereafter the estate devolves to the Crown, but BVD has the discretion to admit valid claims for up to 30 years from the date of death.

There is no government guidance about the procedures that local authorities should follow in cases of intestacy where the net value of the estate is below £500 or it is known (or there is reason to believe) that relatives exist.

Growing Practice of Local Authorities Using Heir Hunter Firms

There is a growing practice of local authorities to use heir hunters to trace unknown next-of-kin where there is an intestacy rather than following the established procedure of making referrals to BVD.

As at 12 September 2017, of the 371 local authorities that have been contacted through an FOI request, a total of 163 have disclosed that they currently use or have used an heir hunter or genealogical researcher either to trace next of kin where a public health funeral is to be or has been arranged, or as part of their functions relating to tracing owners of empty homes or deputyship for individuals who are unable to manage their own finances.

This is an increase of 90% (77) in just a year from the 86 local authorities that had disclosed their use of a genealogist when the data was analysed up to 29 November 2016.

The figure of 163 councils that admit to using an heir hunter may not fully reflect the extent of the practice as some councils have given conflicting responses that suggest at best a lack of proper attention when dealing with FOI requests, and at worst that relationships with heir hunters may be informal to the point of falling below the radar.

Local authorities' increasing referrals to heir hunters is reflected by GLD's statistics. The figures compiled from an FOI request below show that from 2011 to 2014 local authority referrals to BVD accounted for well over 40% of total referrals, but dropped to 32% in 2015 and 37% in 2016.

Year	Number of estates referred by all referring parties (incl health trusts)	Referrals by local authorities	Local authority referrals as a percentage of total estates referred
2011	1,653	729	44%
2012	1,749	832	48%
2013	2,016	867	43%
2014	1,610	697	43%
2015	2,001	638	32%
2016	1,608	591	37%

Of the 1,608 estates referred to BVD in 2016, by 27 November 2017 over 80% of these cases were no longer on the unclaimed estates list. In other words, the vast majority of estates that BVD accepts are ultimately inherited by entitled relatives.

Reasons Why Local Authorities are Engaging Heir Hunters

Intensive and Misleading Marketing by Heir Location Firms

The upward trend of local authorities using heir hunters seems to be the result of sustained and rapidly increasing marketing campaigns by heir hunters, which even includes offering contributions towards public health funeral costs to selected local authorities.

Heir hunters offer their services free of charge to the council and they disingenuously claim that in using them the council will:

- have a greater chance of saving or recouping money for funeral expenses and also for other charges such as house clearance and storage fees
- relieve themselves of responsibility for an estate sooner than if they referred it to BVD
- fulfil a 'statutory duty' to find relatives (even though this duty does not exist)
- avoid bad publicity arising from relatives being not being able to attend a funeral

One heir hunting company is known to employ field agents incentivised by a 10% commission fee to make contact with council officers who may provide early information about intestate deaths.

Another approach is for firms to offer to resolve the problems caused by low-value intestacies (less than £500) which cannot be referred to BVD (and are unprofitable for the firm) in return for having exclusive access to all other cases which would be potentially lucrative.

Some heir hunting companies try to discourage councils from referring any intestacy to BVD. In order to legitimise their pursuit of having an exclusive arrangement with a local authority, they will give a misleading version of the Bona Vacantia Division's guidelines and the BVD referral process, and misrepresent the legal obligations of local authorities.

For example, one research firm asks rhetorically: "Referring Cases to the BVD – a pointless exercise?" before going on to claim that "anyone referring an apparently Bona Vacantia Estate" to GLD "can no longer expect the GLD to do anything to help them other than placing a simple online advertisement. If next of kin are found, the case will be coming straight back to your desk!"

Despite the fact that the GLD referral form is just one page long, and needs to be accompanied only by a death certificate, another firm claims that "Making a referral [to BVD] can often be a time consuming and laborious task, it can leave a case in limbo for months."

The following is a misleading quote from one heir hunter's marketing leaflet:

"Recent changes to the Bona Vacantia & Government Legal Department Claims Procedure published 29th April 2016 has made it apparent that they will make minimal effort to find NOK [next-of-kin] and at any opportunity, they will refer the Estate back to the Council.

"It is now abundantly clear that the most effective and efficient route for a Council to take is to refer a case immediately to a firm of professional Genealogists like Finders International, not only for the Council's benefit, but also for the Estate and next of Kin."

In a significant and troubling development, in July 2017 Birmingham City Council (BCC) effectively asked tenderers seeking to provide heir location services to bid to make a payment to the council for details of each intestacy that BCC could provide. In its quotation document (Provision of Genealogy Services PQ0163), the council specifically referred to these intestacy details as "leads", setting a starting bid of £200 per lead. The council claimed:

"A single supplier model has been chosen to ensure the development of a strong working relationship with the Authority and to ensure a consistent and compassionate approach for all families in sourcing next of kin."

However, in their evaluation of candidate applicants, they gave the majority weighting (60%) to the fee offered by each candidate.

Legal opinion we have sought from Queen's Counsel indicates that it is unlawful for a local authority to charge for release of information about intestacies. Despite this, Birmingham has awarded the contract for finding next-of-kin to a single research firm based on their tender procedure which prioritises the council's own remuneration over quality of service.

Disturbingly, given the sensitive nature of the task, it is surprising that the majority of local authorities who use heir hunters are unable even to confirm that any selection method had been used in considering which researcher(s) to choose.

Recouping Funeral Costs and Other Savings

Of the 154 local authorities that provide reasons as to why they use heir hunters or researchers, 97 (63%) refer explicitly in some way to family members taking over funeral arrangements, or the council avoiding or recouping the cost of a public health funeral, and/or public finances.

They claim that once they trace next-of-kin they might be able to take the case off the hands of the council completely. Even if the next-of-kin are unable or unwilling to pay, any fees incurred by the authority will receive priority status for payment as soon as the estate has funds available. This may include payment of:

- Funeral expenses
- Administration charges
- House clearance fees
- Storage Fees
- Empty home insurance

About 90% of public health funerals are of people with estates of little or no value which means the cost falls on councils who have to arrange funding from already over-stretched budgets.

Many authorities appear to believe that in order to exercise their right to reclaim the reasonable funeral costs from the estate they need themselves to locate a relative entitled to inherit the estate. This is false.

A personal representative does not need to be appointed nor a relative located in order to recover funeral costs from the deceased's estate.

Where a public health funeral has taken place, the funeral cost, including officer time spent in arranging it, is the first claim - or priority debt - on the estate by law and can usually be recovered by applying to the bank or building society of the deceased without the need for a personal representative to administer the estate.

Of the 121 local authorities that provided specific figures on the number of families taking over funeral arrangements, only 39 (32%) were able to report having any success, while 51 (42%) reported no success at all and 31 (26%) were unable to answer the question because records had not been made or retained.

We estimate from extrapolating the figures from these authorities that the rate at which families take over arrangements from the council can be calculated at just over 13%. Most importantly, in almost all of these cases the cost of the funeral was covered by the estate of the deceased which the local authority would have had a claim on anyway.

Local authorities were asked whether there had been instances where there had been insufficient funds in the estate, but family members who had been located had nonetheless paid for funeral costs from their own pocket. Only 9 out of the 113 councils that responded to the request were able to report that this had taken place, and on 16 occasions in total, which equates to less than 2% of

referrals to genealogists based on extrapolated figures used. This suggests that the perception that estranged families will pay for funerals from their own pocket far outstrips the reality.

There is no reason to believe that this same 2% of families would not have funded the funeral had they been located via the normal process of BVD advertisement and certainly had they been identified via a council's own advertisement or referral to a panel of genealogists working in parallel. The use of an heir hunter/genealogist rarely results in savings above what could normally be recovered from the estate.

The apparent disconnect between local authorities' financial motivation for using heir hunters and the actual savings that are made is borne out not only by the data as a whole, but by FOI responses from individual councils.

This makes it all the more important that perceived benefits are weighed carefully against the consequences and risks of disgruntled beneficiaries taking action against local authorities for loss of inheritance through excessive heir hunter fees, wrongly identified next of kin, or having been omitted from the estate distribution, where a referral to BVD or the Duchies would have ensured a transparent and open process.

Confusion About Obligations

The FOI responses confirm that confusion remains about the scope of local authorities' duties under Section 46 of the Public Health Act 1984, with 71 councils indicating their belief that the use of heir hunters relates to, or is in fulfilment of, statutory duties under that legislation.

- **Shropshire Council** states that BVD “expects a Local Authority to have conducted searches with a genealogy company to trace entitled next of kin before referring the case to them”
- **Northampton Borough Council** states that the use of heir hunters is “to fulfil legal obligation to make reasonable attempts to identify/trace next of kin”.
- **Rossendale Borough Council** inaccurately interprets the legislation to mean that “if we arranged a funeral and disposed of the estate without trying to identify a next of kin, and then the next of kin made themselves known then the council would be in a position which may be questionably unlawful.”

This is an area governed by a patchwork of statutory law, common law and tradition, so it is not surprising that local authorities find it hard to navigate. Other legislation referred to by councils includes the Administration of Estates Act 1925.

Several councils state that they fear reprisals from next of kin if they undertake a public health funeral for the deceased without having first located them. This is despite there being no legislation that requires local authorities to locate the relatives of a deceased person who has died intestate. Section 46(3) of the Public Health Act obliges local authorities to comply with the deceased's funeral preferences, where they are aware of them. It does not oblige them to locate distant or estranged relatives who are unlikely to know the deceased's final wishes.

Simple procedures such as checking with a carer, friend or neighbour, or for a note left with the deceased's possessions are more likely to shed light on their preferences. Through these means,

councils can often quickly establish whether relatives exist and, in many cases, provide a straightforward means of contacting them. Such necessary enquiries should not be confused or conflated with instructing a commercial researcher to conduct an in-depth investigation of public and historical records in order to track down relatives for whose existence there is no evidence.

Whilst acknowledging that it is not a legal requirement, many councils indicate that they believe that there is a procedural expectation from BVD that they must use a researcher to trace next of kin.

- **Newark and Sherwood District Council** claims that the BVD “requires the Council to make proper enquiries.”
- **Richmond Upon Thames Council** states that: “Bona Vacantia expects that preliminary research is done before a referral is made.”
- **Cornwall Council** explains that “Farrer & Co (solicitors for the Duchy of Cornwall) expect us to have made some enquiries before referring an intestate case to them.”
- **Walsall Metropolitan Borough Council** says that BVD “will not accept the estate unless it has been checked and confirmed that there is no Will or next of kin.”
- **Dacorum Borough Council** admit that “whilst [the use of genealogists] is not a statutory function we feel this demonstrates our social responsibility as a local authority to trace any next of kin if possible and offer the best service possible to the deceased”.

Of the 154 local authorities that provided reasons as to why they use heir hunters or researchers, 29 (19%) stated that doing so allows relatives the opportunity to attend the funeral.

The possible existence of a relative certainly appears to create a conundrum for local authorities wishing to refer the estate to BVD or Duchies, and a widespread perception seems to be that this can only be resolved by using the services of an heir hunter. It seems likely that this misperception has been promoted by heir hunters, who propagate in their presentations a perverse interpretation of BVD guidelines for their own commercial benefit.

Perceived Delays With The BVD Referral Process

Some local authorities use an heir hunter firm as they believe that next of kin may thus be identified more quickly.

In total, 47 local authorities state that the BVD or Duchies (as appropriate) will return or refuse to take responsibility for estates where there could possibly be a living relative and/or that they prefer not to make referrals to BVD because of the (wrongly) perceived inefficiency and duration of the process that ensues.

Until April 2016 a claim made on an estate advertised by BVD would have been dealt with by BVD, but now cases are passed back to the referrer once a claim has been assessed and accepted. This

appears to create apparent procedural problems that discourage local authorities from making referrals.

- **Middlesbrough Borough Council** allege: “If a referral is made to Treasury Solicitor (now GLD), and relatives are subsequently found, the Government Legal Department simply returns the referral to the authority with a note to confirm that relatives have come forward. They do not give any information about the relatives, and consequently, until those relatives come forward, the authority has to continue holding the funds.”
- **Adur and Worthing Council** indicates that because BVD pass estates back to the local authority if relatives are found, it is “more timely and efficient to use genealogists” rather than go through this process.
- **Torbay Council** admit that their reason for bypassing the normal BVD process is “expediency”
- **North Tyneside Council** contend that the BVD process is slow and ineffective and that using a research organisation has provided a more effective way of passing responsibility to the relevant individual.

In reality, BVD’s policy is to advertise all estates within five days of receiving a referral. Genealogical researchers constantly monitor the BVD unclaimed estates list and work in competition with each other to locate and sign up heirs. With a large number of firms racing to sign up beneficiaries, this is the fastest way to locate relatives. .

Against this perceived delay of 5 days must be set:

- the probability that competing firms racing to solve cases on the BVD unclaimed estate list will find entitled relatives much faster than a single heir hunter following up an exclusive lead;
- trained BVD officers taking time to assess the validity of any claim, thereby relieving local authority staff of a responsibility that they are perhaps not trained to undertake;
- the legal requirement that (generally, for intestate estates over £15,000) a grant of letters of administration must be obtained by one of the deceased’s next of kin before the council’s responsibility for property and bank accounts can be transferred. This requirement, which takes several weeks, applies whether or not a local authority refers a case to BVD or passes it to an heir hunter.

On newly advertised cases, BVD officers generally are able to quickly check the veracity of claims and often reply to the claimant by return of post. They will direct a correctly located relative to the referring local authority as soon as they have accepted the lawfulness of the claim. Once appointed, a personal representative will contact the local authority.

The above local authority responses seem to imply that dealing with BVD is open ended, that there is no time limit. This is not the case as, if there is no response to an advert on the BVD website within approximately four months, the Division takes steps to administer the estate. Once BVD has taken over administration of an estate it can no longer revert to whoever referred it. This means that if claimants have not come forward within four or five months, local authorities will nevertheless be relieved of responsibility for the estate.

Furthermore, an analysis of 20 deceased estate notices that GLD placed in The Gazette in late November and early December 2017 shows that when no valid kinship claims are received BVD can be seen to be acting as administrator of most estates well within a year of their referral.

There is no evidence to back up the assumption that relatives are found more quickly when cases are referred exclusively to a single heir hunting firm rather than to BVD.

EXAMPLE

Birmingham City Council did not refer a case to BVD until more than a year after the death, presumably because it had previously been unsuccessfully investigated by an heir hunter working on an exclusive lead provided by the council. Anglia Research contacted a maternal cousin of the deceased eight days after the BVD notice appeared. Had the Council referred the case to BVD immediately as it should have done, relatives may have been able to attend the funeral.

Need to Dispose of Unclaimed Estates

The concern over expediency is linked to some local authorities considering it to be an unacceptable burden to hold unclaimed estates and being keen to see property and monies passed to an appropriate person at the earliest opportunity. Of those that gave reasons for the use of genealogists or heir hunters, 29 local authorities referred to the need for the estate to be wound up, administered or for the council to pass on assets and/or funds.

- **Middlesbrough Borough Council** says that they use heir hunters: “in order to disburse funds to beneficiaries”.
- **Devon County Council** explains that using heir hunters is to “enable estates to be dealt with as quickly as possible, particularly when the local authority are holding residue monies and possibly other valuable items.”
- **Islington London Borough Council** says that one benefit of using a genealogist is to “clear funds that the council is holding for the estate instead of the council having to hold these funds.”

Several councils consider any responsibility for the estate to be a liability, perhaps because it may involve expense and time spent in securing property and the storage of possessions, even though reasonable costs can be reclaimed from the estate in due course.

Referring a case to BVD will at worst extend a council’s responsibility for property by a maximum of five days and, given the number of research firms that monitor the unclaimed estates list closely, competition is likely to drive timescales down.

When it comes to difficult cases (which research firms might investigate over many months or years), the quickest way by far for a council to relieve themselves of responsibility for an estate is to refer it to BVD as soon as possible, in line with government policy. Generally, BVD will begin to administer the estate within a few months if no claim is received, and the council will cease to be burdened with it. When no relatives exist, referral to BVD is the only possible way to deal with a case; BVD and the Duchies are the only authorities that can administer genuinely bona vacantia estates.

Mistaken Interpretation of a Council's Role

Some firms are using changes to the process introduced in 2016 to suggest they have put an added burden on local authorities. As one has written:

"Previously a documented claim to the Treasury Solicitor [now GLD] on behalf of a potential heir would be admitted by the Treasury Solicitor, which would then release a schedule of the deceased's assets and liabilities to a solicitor instructed by the potential heir. Under new rules, the GLD refers the claimant back to the original source of the referral. In many cases this will be a local authority or NHS trust. This authority will then be responsible for providing the claimant or their solicitor with full details of the deceased's assets and liabilities, adding to its own administrative burden."

This misrepresents the facts of the matter. Local authorities have had and always will have the "administrative burden of providing full details of the deceased's assets and liabilities" when a case of intestacy with no known kin occurs within their area.

In the past they carried out this administrative 'burden' when referring an estate to the Treasury Solicitor. Now they carry it out when GLD takes over administration of the estate or a claimant or their solicitor does so. Passing on estate assets and liabilities is a burden they cannot escape.

Impact of Councils Using Heir Hunters

It is not the responsibility of local authorities to ensure the correct distribution of intestate estates. What many authorities fail to realise is that if they bypass the BVD process and refer a case directly to an heir hunter they may incur a legal obligation to correctly assess the validity of any subsequent kinship claim made on the deceased's estate. They seem to believe that the Probate Registry will assess the validity of any kinship claim when issuing a grant of letters of administration. However, this is not the case. The Probate Registry does not request any genealogical proof, relying solely on the fact that an applicant for a grant swears an oath as to who they are and how they are related to the deceased.

This raises the question: when the BVD process (which involves the transparent listing of the deceased's details and then involvement of staff trained to assess claims) is bypassed, who checks an heir hunter's findings? Even if it is claimed that the solicitor administering the estate does so, it should be remembered that both heir hunter and solicitor are paid from the estate. When the financial interests of both parties converge, the legitimacy of the system is thrown into doubt.

In relation to finder's fees, a total of 94 local authorities have indicated that they have considered the financial implications for next of kin, but the majority of these go on to elaborate in a way that suggests they simply wish to either deny involvement or avoid any council responsibility for the financial transaction that ensues when next of kin are found, despite the council's role in initiating the process.

The suggestion seems to be that, when the heir hunter produces a finder's fee agreement for signing, the next-of-kin will be an astute enough consumer to know that there are other available options. This ignores the fact that in many situations the next-of-kin is offered no choice at all and is often unaware that there is no obligation to deal with the heir hunter, particularly when that heir hunter claims to be acting under the authority of a public body, as often happens.

Inaccurate Tracing

When no oversight is provided, either by experienced BVD officers or rival genealogists where there has been no open or even limited competition, property that a council wants to get off its hands may quickly end up in the wrong hands. It is by no means unknown for claims to be admitted by councils from incorrect families, submitted by incompetent heir hunters, and for rightful heirs to be omitted.

Without the open advertisement of estates, it is difficult for wronged next-of-kin to intervene or seek redress; indeed, they may remain unaware of their legal entitlement. Authorities need to give careful thought to their role in any mis-distribution if they provide information to a sole heir hunter or researcher.

EXAMPLE

When Kathleen McPhail [name has been changed] died in 2013, she appeared to have no next of kin. Nevertheless, her local authority, the **London Borough of Tower Hamlets**, decided to pass details of the intestacy to an heir hunter rather than to BVD. The heir hunter located a cousin and the claim was accepted by the local authority. The cousin received the payout, and the heir hunting firm obtained its fee.

However, their research proved to be inaccurate. The national probate indexes, readily available online, show that the deceased's mother left a will when she died in 1971. In the will she refers to two children - the deceased and also her brother - and his two children. The payment to the cousin, and to the heir hunter, was in error. The two grandchildren were the deceased's niece and nephew. Both were still alive, meaning that the cousin was entitled to nothing.

Furthermore, even had there been no surviving nieces or nephews, the 'cousin' who had been signed up as a client by the heir hunter was not entitled to this inheritance. The heir hunters had 'found' a completely unrelated family and made a fundamental genealogical error that unqualified researchers frequently make. The claim should never have been accepted.

Had the case been advertised, a range of rival genealogists working in competition would have ensured a correct solution.

Excessive Fees

When an heir hunter is given exclusive access to the details of an intestacy, they work without competition which means they can set any price safe in the knowledge that no other firm will undercut them. The result is that they generally charge between at least 15% in fees, and often much more, compared to approximately 2%-5% when there is open competition.

This could amount to some £30,000-£50,000 *additional* income from an estate worth £200,000 and often VAT will have to be added. Meanwhile, relatives are unaware that they are missing out on consumer choice because they hear from no other researcher. Evidence has been seen of heir hunters, armed with privileged knowledge of an intestacy from a local authority, manipulating the two entitled kin into agreeing a finder's fee of one-third (+ VAT) of the gross estate value.

EXAMPLE

Waverley Borough Council picked one firm of genealogists to work with although they have no formal contract in place. The council first referred an estate to the heir hunters and then a few weeks later to BVD. This quickly appeared on the BVD list and Anglia Research soon located several beneficiaries, some of whom had already been contacted by the firm working exclusively on the case several weeks earlier. These beneficiaries had signed a contract with the heir hunters for a 15% plus VAT finder's fee, as a result of the private referral by the council. The injection of competition into what had previously been a monopolistic situation meant that when Anglia Research offered terms at 5% to other relatives, the first firm undercut this and immediately offered to reduce their fees with the beneficiaries that they had already signed to 5%.

Lack of due diligence or contractual documentation

As councils do not pay heir hunters for their services they often feel able to bypass due diligence guidelines and procurement processes. Of the 163 local authorities that have disclosed that they use an heir hunter, 111 appear to have settled on their researcher of choice without a clear, adequate or formal selection method that they can report.

West Lindsey District Council said in 2015: "We picked a random company off the internet where there would be no liabilities to the authority, as we had not had a need to use a company in the past so we had to start somewhere and would use a random company in future if necessary."

This laissez faire approach extends to contractual documentation. Only 10 councils acknowledge that they have a contract in place and only a few of these involve formal contract documents.

Whether by de facto contract or written contract, the relationship between local authority and heir hunter has a legal status and is arguably actionable. For example, in theory, a local authority could claim breach of contract if an heir hunter omitted entitled relatives or located the wrong ones. Of course, no authority ever takes this course. As a result, councils that create and foster local heir hunter monopolies do nothing to assist relatives who, as a direct result of the council's actions, have missed out on their inheritance, or have been grossly overcharged.

Heir Hunters Appear as Council Representatives

Broadly, the FOI responses reveal that local authorities fail to recognise that it is all too easy for heir hunters to represent themselves as acting on the council's authority or as the council's agent. Located next-of-kin, who have no knowledge that the arrangement is informal, may well believe or be led to believe (directly or indirectly) that the heir hunter represents the council or that the council

has endorsed their services. This lends the heir hunter an authority that they would not have in the open market. Clearly beneficiaries may be swayed to accept higher percentage fees or agree to the services of a particular solicitor when an heir hunter gives the impression of having the council's seal of approval, all of which is reinforced when the relatives hear from no other researchers. It is impossible to say if the next of kin realise that they have a choice whether or not to instruct the heir hunter.

EXAMPLE

When Mr Graham died intestate, he left a gross estate valued at over £800,000. Rather than immediately referring the case to BVD, the metropolitan council where he was located passed the lead to an heir hunting company, three months after the funeral.

In early 2014 the heir hunters contacted Ms Thody, a cousin once removed of Mr Graham. Believing that the company had an official role with the council, she signed a contract with the company. They initially obtained a 20% finders' fee, although Ms Thody did later protest so it was reduced to 15%. In addition, she was offered the use of the heir hunters' favoured law firm, who again charged a significant fee. Ms Thody now alleges maladministration by the council resulting in a total loss of around £84,000 to the family: had the council followed the correct procedure and referred the case to BVD to advertise, it is likely that fees as low as 2%-3% would have been paid.

Note: names have been changed.

Lack of Scrutiny

Leads that are passed to an heir hunter on an exclusive basis are effectively shrouded in secrecy with no possibility of either commercial rivals or BVD officers (who would otherwise verify a claim) checking the heir hunter's results. This shields incompetent researchers from exposure and also opens a gateway to fraudulent claims. Exclusive, non-checkable referrals lead to errors.

As demonstrated, heir hunters reap all the benefits of relationships with local authorities whilst councils bear all the risks and relatives pay the price as any possibility of oversight or consumer protection is absent.

Exclusivity and Non-Disclosure

Of the 163 councils that use a genealogist, there are 39 that do not publish their own public health funeral list and will not disclose details of public health funerals under the FOIA. When asked specifically to disclose the information that they have provided to a favoured genealogist they will claim that it is exempt from disclosure under various exemptions of the FOIA. By passing information exclusively to a single heir hunter and refusing others access to that same information, these local authorities, which include **City of York Council**, **Derbyshire County Council** and **Birmingham City Council**, are creating a situation which carries the highest risk for next-of-kin and for the reputation of the local authority itself. This practice not only bypasses market competition which would keep

fees reasonably low for located relatives, it also lacks the normal transparency that the public rightly expects from local authorities. Moreover, it prevents the research conducted by heir hunters at the request of these local authorities from being checked for accuracy, meaning that errors such as missed beneficiaries and erroneous or even fraudulent claims may never be brought to light.

Currently, 134 councils publish information on their public health funerals online. Seventy-five of these do not use a genealogist, meaning that open competition is maintained as all heir hunters get access to the information concurrently which results in reduced risk and the best outcomes for next of kin. However, 59 of the 134 local authorities that publish an online list also use an heir hunter. This means that details of an intestacy are unlikely to be made public until after next-of-kin have been located and the funeral has taken place. Consequently, publication fails to protect next-of-kin from overcharging as competition has been circumvented: early leads are essentially exclusive leads and these result in higher finders' fees. Moreover, the lists published by local authorities normally only record public health funerals that have actually taken place and therefore do not include cases where there has been an estate and an heir hunter has been used to trace next of kin who have then taken over responsibility for the funeral from the council. Details of these cases will never be made public and so cannot be checked for accuracy or completeness, leading to a higher risk of fraudulent or erroneous claims and entitled beneficiaries missing out on their inheritance.

If the risks to authorities of a failure to adopt transparent processes around intestate estates are not obvious, a 2012 case is instructive. A council officer worked to locate next of kin on her own account using privileged information about deaths of intestate individuals, and charged commissions to them. She also used bank cards of deceased people. She was prosecuted for misconduct in a public office, theft and fraud and imprisoned. The prosecutor explained to the court that the officer's actions were akin to insider trading.

Information about isolated intestate deceased people and their assets has a value, and opportunities for profiting from that value should be removed from officers through policy, good practice and the audit process.

Deputyship

The role of local authorities who are appointed as deputy for vulnerable people through the Court of Protection ceases upon the death of the client. Council officers within a deputyship department should not involve themselves with the assets of the deceased person. The funeral arrangements (if not pre-arranged and there are no known next-of-kin) should be passed immediately to whichever local authority department arranges Public Health funerals.

The results of the FOI research show that 80 out of 146 local authorities that report having a deputyship department admit to using an heir hunter to find relatives of deceased clients. Some such authorities stray into an involvement with the estates of deceased clients (despite their role ceasing upon death) and some even charge the estate for officer time spent liaising with heir hunters. Such authorities are putting themselves at legal and reputational risk. By way of example the Director of Law and Governance at Oxfordshire County Council stated that: "In the event that

someone we act as Deputy for dies, and we are unaware of their next of kin, the Council ordinarily contacts the genealogist to ascertain their details.”

House Clearance

A property may be unoccupied as the result of an intestacy, but this will not be evident at the point when council officers instruct tracing agents to find the owner. As a result these cases cannot be referred to BVD.

When heir hunters trace the owners of empty property, the service is free for councils and free for any owners traced. If it turns out that the owner has died, the service is not free for his or her heirs.

Local authorities require all relevant cases to be solved, not just those that may prove lucrative for an heir hunter. In seeking to achieve this goal, many authorities form exclusive relationships with a tracing agent or heir hunter who undertakes to handle every case, whatever its value. Unfortunately, as our research shows, these relationships are opaque, anti-competitive and tend to adversely affect any beneficiaries that the heir hunter might find. Competitive fees can be ensured simply by introducing competition between tracing agents.

Of those that responded, a total of 17 local authorities said that they use or have used an external contractor for house clearances in relation to their duties around public health funerals. Only three of these councils have required the house clearance company they use to sign a confidentiality agreement. House clearance contractors are among the first agencies to be informed of an intestacy by a council that uses them. Given the value of early or exclusive leads to heir hunters, the potential for contractors to leak information on intestate estates should be clear.

This is concerning where local authorities use house clearance contractors which have links with heir finder firms. For example, Birmingham City Council, Northampton Borough Council, Northamptonshire County Council and Oldham Metropolitan Borough Council have all disclosed that where they have assumed responsibility for the home of a deceased person they have used a house clearance contractor, Prospect PS, a company whose director lists his occupation as “probate researcher” on his Companies House return. The Company has links at director level with the heir hunting company Estate Research.

It is recommended that councils ensure the highest standards of probity and guarantees of confidentiality from contractors to safeguard proper referral procedures.

EXAMPLE

A tracing agent provided with an exclusive lead on an empty property by a local authority obtained a finder’s fee from relatives of around a quarter of the *gross* value of a £3.7 million estate. With VAT, this amounted to fees of over £1 million for what was only a few hours of research.

Conclusions

One of the underlying problems that this report exposes is that local authorities fail to understand the role that transparency and competition plays within the probate research industry.

Even where local authorities appear to make arrangements with more than one heir hunting firm, they still insist on passing information to them one at a time so not allowing for any competition.

For example, one council's approach is that: "any probate researcher which approaches us is put on a list and then we take it in turns to use either one". While another's stance to ensure that the process is fair and equal is to make referrals on a 'cab rank' basis.

While, in the main, councils seem to be aware that heir hunters are commercial operators, their actions display an astonishing naivety about the value of this market and the fundamental and vital role of competition in driving down prices.

Most contractors with which local authorities work operate within regulated markets with a degree of oversight; bad practice is penalised and its victims compensated. When dealing with service providers that are unregulated, authorities should appreciate that consumer legislation cannot provide any sort of regulatory or protective function when it is not combined with transparency and competition.

In this report we have shown that:

- Councils' misconceptions of their legal duties and misperceptions of BVD guidelines and referral process mirror the misleading views disseminated in heir hunters' marketing materials.
- There is no evidence that the increasingly widespread practice of referring leads to a single heir hunter or research firm confers any benefit to councils.
- These relationships are opaque and anti-competitive, and tend to adversely affect any beneficiaries that the heir hunter might find.
- There is a great deal of evidence that referring leads to a single heir hunter or research firm damages outcomes for relatives, whether through inflated percentage fees or erroneous research.

Recommendations

Anglia Research has prepared a suggested Code of Practice to be observed by local authorities for handling intestacies. This is set out in the appendix.

The basic tenets are that where possible and in keeping with GLD advice, intestacies should always be referred to BVD as soon as practicable for publication on the unclaimed estates list. This will result in the widest possible dissemination of the case details, the maximum competition and consequently the most speedy and accurate resolution.

Some intestacies cannot be referred to BVD because the net value of the estate is below £500, or it is known, or there is sound reason to believe that relatives exist. In such cases, local authorities should take steps to encourage competition and prevent abuse. We recommend that they:

- either follow the model set by BVD and advertise details of intestacies on their own websites, in a similar way to the BVD's [unclaimed estates list](#)
- or encourage competition and prevent abuse by referring each case to a number of genealogists concurrently.

Local authorities were asked why they do not release information to more than one researcher at a time. This question was to ascertain whether the councils had considered a method that would retain an element of market competition and mitigate the risks involved in releasing information exclusively to a sole researcher. Of those that responded, 35 councils said that they had not used this method because they had not identified a need for it and/or they were satisfied with their current service provider. Twenty-one councils expressed resistance to the idea and/or indicated that an exclusive referral is more expedient or simple. **High Peak Council** indicate that “time constraints often prevent this but would be considered if time allowed”, while **Staffordshire Moorlands Council** are open to the idea and state that “there is no reason why we cannot if a suitable method can be found.”

Some local authorities are starting to appreciate the reputational risks and potential liabilities. Indeed, **Broxtowe Borough Council** recently referred a case to three research companies simultaneously. Further, a recent response from **Oxfordshire County Council** states that they “have just established a panel of companies” and further enquiries are being made into whether all estates will be referred simultaneously to the three companies to ensure competition and transparency of research.

Model of Good Practice for Referrals to Genealogists

Where councils are forced to resolve a case themselves, we suggest a practical model for establishing and managing a panel of three genealogical research firms that will support a local authority's goals while protecting entitled next of kin as consumers. Panellists to be selected through the use of due diligence, where accreditation, qualifications, staff accountability, genuine independent regulation, adequate Professional Indemnity Insurance and proposed relatives' communication materials are taken into account, as well as the usual sources of checks for probity of dealings.

The council selects three research firms to whom it will refer work. All three firms (A, B and C) understand that they will be obliged to take a referral if they are mandated to do so, but that every referral will be sent to all three firms simultaneously.

When a new case comes up, the council sends a single email referral to their contact in each of the three companies.

The email should contain all the relevant details that council officers have gathered during their preliminary investigation of the case, including the name and date of death of the intestate, whether a funeral has taken place (or the likely date of the funeral), names of any known or suspected

relatives (where available) and their relationship to the deceased, and the estimated size of the estate.

On the first occasion that the council refers a case, Company A is mandated to research it, and this is made clear in the email. The second time a referral is made Company B is mandated to research it, and so on in rotation.

However, in every case the other two companies receive the email referral as well. This means that they can assess the referral details and decide whether to research the case in competition with the mandated company. When they themselves are mandated they have to take the case. When they are not mandated they make a decision whether or not to pursue it, based on the details available, just as they do with any case advertised by the Bona Vacantia Division.

Transparency means that competition automatically arises whenever it is needed. Researchers are alert to the clues that suggest that a case will result in a finder's fee.

If, for example, Company C is mandated to find the relatives of someone who died intestate but with no assets, companies A and B will leave the case to C to solve because it is clearly not lucrative. If, however, the mandated company receives a referral that involves a £200,000 property, the non-mandated companies will almost certainly decide to investigate and the resulting competition will benefit relatives.

There are only four prerequisites to ensure that the panel works fairly for the council, the heir hunters and any beneficiaries of an intestacy that may be involved:

- Cases are mandated in strict rotation (A, B, C, A, B, C...).
- Every email referral makes it clear which of the three companies is mandated.
- Every email referral is sent to all three companies simultaneously.
- Every email referral contains all the details of which the council is aware.

Empty Homes Work

It is suggested that the same arrangement should apply for empty homes work. In these cases the email sent to each member of the Panel should contain information about the last known owner's name, about the property, whether it is registered, when it was registered, whether council tax is being paid, or a council tax exemption applies (in which case the nature of the exemption should be stated). If council tax is not being paid, the email should record when payment ceased.

These are all details that council officers should already be aware of as a result of their preliminary investigation of the case. Of course, if there are other relevant details of which the council officer is aware these should be included.

As above, transparency means that competition automatically arises whenever it is needed. Researchers are alert to the clues that suggest that a case will result in a finder's fee.

If, for example, Company C is mandated to find the owner of a house on which council tax is being paid, or a current council tax exemption applies, Companies A and B will probably leave the case to C because the owner clearly knows of the asset. If, however, the mandated company receives a referral for a property that is not registered and no council tax is being paid, the non-mandated companies will almost certainly decide that the case is potentially lucrative and will investigate.

The same prerequisites as above apply except for the last one which is replaced by:

- Every email referral contains information about house registration and council tax payments, as well as any other relevant details that the council is aware of.

This model will work both for councils that refer all empty homes cases to an outside party, and also for those that maintain their own in-house tracing teams, referring only the most difficult and time consuming cases to an external research firm.

Local authorities who follow this model may wish to investigate whether data protection guidelines will allow them to monitor the performance of the companies they use. Although cases vary in complexity, if companies report back to the council on percentage fees charged to beneficiaries, the time taken to identify them and the specialist expertise employed, it becomes possible to evaluate whether the selected researchers represent good value for members of the public.

Appendix

A Suggested Code Of Practice For Public Authorities When Dealing With Intestacies That Occur Within Their Jurisdiction.

1. Overarching principles

While fulfilling its statutory duties concerning public health funerals under Section 46 of the Public Health (Control of Disease) Act 1984, the Authority is committed to maintaining the highest degree of integrity in all dealings that relate to the assets and beneficiaries of the estates of those who die intestate, and with no known relatives.

2. Referral to the Bona Vacantia Division or Duchies of Cornwall or Lancaster

2.1 Where there is no evidence of living next of kin amongst the personal effects of the deceased person, or from information already in the Authority's possession, the intestacy will immediately be referred to the Government Legal Department Bona Vacantia Division (BVD) or the Duchies, as appropriate.

Bearing in mind that the BVD has issued [warnings](#) about copycat websites designed to intercept referrals, care will be taken to refer the intestacy to the correct authority.

2.2 BVD advice on referring an estate to the Treasury Solicitor can be found [here](#).

3. Undertaking some of the functions of the BVD or Duchies of Cornwall or Lancaster

3.1 If the BVD or Duchies do not permit a referral, the Authority will undertake some of the functions that the BVD or Duchies perform when they receive a referral. To this end, the Authority will ensure that its staff have the necessary skills, knowledge and resources, as set out in sections 4-7 below.

3.2 The Authority will:

- either appoint a panel of three accredited genealogists (using appropriate procedures) to locate next of kin, with all being provided with identical information simultaneously;
- or publish the name and date of death of the deceased person on its website in such a way as to allow multiple genealogists to search for next of kin. In this case, the Authority may also choose to appoint a sole genealogist or probate research firm, provided that they are not supplied with information in advance of the publication of the name and date of death of the deceased.

4. Knowledge and understanding required by handling officers

4.1 To ensure that officers understand the need for confidentiality, and are able to identify risks arising from the improper use of information, the Authority will provide suitable training for any of its staff who:

- deal with information about intestate deaths, and the assets of such persons;

- are involved in the Authority's decision-making processes in relation to such deaths and assets.

4.2 If the Authority decides to undertake some of the functions otherwise performed by the BVD or Duchies, it will ensure that staff who are involved in assessing claims of kinship possess the necessary skills and knowledge to analyse the evidence needed to verify such claims. They should receive training in, and have demonstrable knowledge and understanding of, the laws of intestate succession and possess skill in interpreting genealogical and evidential material.

5. Record keeping

5.1 The Authority will document each stage of its actions in relation to the estates of those who die intestate with no known next of kin.

5.2 The Authority will maintain a written record of any contact made with house clearance contractors, valuers or auction houses. It will avoid providing any details of the deceased before the contractor signs a binding confidentiality or non-disclosure agreement. The contractor should certify that they have no business dealings with any heir hunter or genealogist.

5.3 The Authority will maintain a register or log of time spent by its officers in dealing with such estates. This will clearly describe the nature of the activity or task carried out.

5.4 Any discussion that takes place with a third party about locating potential relatives of the deceased will be clearly recorded and described as such, together with a note of the relevant officer's time spent on these discussions.

5.5 Bearing in mind procurement and competition regulations, the Authority will record any decision made:

- to instruct a single agent or organisation to locate the deceased's next of kin;
- to pass details of the deceased or the deceased's estate to a single agent or organisation.

The record entry will be accompanied by a risk/benefit assessment (which may relate to the likely value of the estate), and set out the reasons:

- why only one agent or organisation has been instructed or supplied with such details;
- why the authority has chosen to instruct, or pass details to, the agent or organisation in question (where the absence of cost to the Authority is not a relevant factor) and what checks have been done of their accreditations as genealogists or any legal or other relevant professional qualifications of the agent or their staff.

5.6 The Authority will assess the lawfulness of any payment it makes to a third party agent who locates, or seeks to locate, a relative or relatives of the deceased. This payment will be recorded separately from payments that relate to the deceased's funeral on the basis that any such costs fall outside the provisions of section 46(5) of the Public Health (Control of Disease) Act 1984.

5.7 The Authority will keep a record of any payments made to it by any third party agent who locates, or seeks to locate, a relative of the deceased.

6. Protecting the deceased's assets and avoiding conflicts of interest

6.1 At all stages of the decision-making process, the preservation of the deceased's assets will take precedence over organisational and personal interests.

6.2 Information about the deceased and his/her assets will be kept confidential and secure, with access to and use of such information limited to trained staff who have signed a declaration covering their obligations under this code.

6.3 For the purposes of the Freedom of Information Act 2000, information about the death of deceased persons is exempt information until a week after the details of the death have been referred to the BVD or the Duchies. In cases where the Authority decides to undertake some of the functions otherwise performed by the BVD or Duchies, the full name and date of death of the deceased can be openly published on the Authority's own website (provided that the Authority employs officers who have demonstrable skill and expertise in evaluating kinship claims).

6.4 When publishing the full name and date of death of the deceased, the Authority will try to replicate the practice and procedures adopted by the BVD.

6.5 Information about the assets of the deceased is always exempt information for the purpose of the Freedom of Information Act 2000. Such data will be stored on limited-access servers, password-protected databases or in locked storage facilities.

6.6 Members of staff and contractors who handle such confidential data will sign a confidentiality or non-disclosure agreement or have a confidentiality clause in their contract of employment.

6.7 Actual conflicts of interests, which are interests likely to prejudice a staff member's exercise of their function, are prohibited. They cannot be managed. Only potential conflicts of interest can be managed, and the Authority will be vigilant in ensuring that these are identified and avoided.

7. Managing risks

7.1 The Authority will consider potential conflicts of interest in relation to the roles, responsibilities and duties of its staff. It will develop procedures to monitor and manage those risks.

7.2 The Authority will put in place systems for making an objective assessment of the benefits and risks of passing details of estates to any third parties.

7.3 The Authority will produce guidance for officers who are involved in deaths in the community in any capacity whatsoever (including front-line officers in residential settings or in the community) and explain:

- the requirement of confidentiality under this code of practice;
- the risks referred to in this code of practice.

7.4 The Authority will implement controls to ensure that individuals do not abuse the trust placed in them for personal gain. It will produce and publish a policy describing such controls, including procedures for reporting, investigating and dealing with suspected abuses of trust.

7.5 The Authority will ensure that managerial separation exists between staff responsible for arrangement of the funeral and those dealing with estate assets.



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