

Baby Loss Certificate Scheme: Public Consultation Report

November 2025

TABLE OF CONTENTS

	Page
Executive Summary	3
Section 1: Introduction.....	7
Section 2: Methodology.....	9
Section 3: Analysis of Consultation Responses by Question	11
Section 4: Conclusion.....	26

Executive Summary

Background

The General Register Office (GRO) provides registration services in Northern Ireland, providing official recognition for births, deaths, marriages and civil partnerships among other important life events.

However, losses that occur before the end of 24 weeks of pregnancy are not formally recognised under current legislation. Losses after 24 weeks of pregnancy are considered still-births, and, after this loss is registered, a certificate of still-birth is produced. If an infant dies following a live birth, the birth and loss are both recognised: separate birth and death registrations are completed, and birth and death certificates are created thereafter.

However, there is no formal mechanism in law and no certificate scheme to recognise losses before the end of 24 weeks of pregnancy, even though the heartache and anguish of the families who suffer these losses is very real.

The aim of a Baby Loss Certificate Scheme is to close this gap in our registration service. Its objective is to provide the same formal recognition as other losses through a certificate that recognises the loss of a baby prior to the end of 24 weeks of pregnancy. It will be entirely voluntary, with no legal requirement to record the loss. The resulting certificates will have no legal standing but will provide a formal means of recognising the loss and its impact.

Estimates of how many pregnancies end in loss vary, as there is no standard method of reporting these losses, and many may not be reported at all. Sands estimate that around 1 in 6 pregnancies end in loss during pregnancy or birth¹.

To enable this certificate scheme, the Department of Finance has introduced the Deaths, Still-Births and Baby Loss Bill into the Assembly. This Bill contains provisions which will enable us to establish the new Baby Loss Certificate scheme. This public consultation was designed to inform the design of the scheme we create, to ensure

¹ [Sands consideration of baby loss](#)

that it meets the needs and expectations of anyone who has been affected by a loss here.

Consultation on the draft Content and Parameters for a Baby Loss Certificate Scheme

The draft parameters for a Baby Loss Certificate Scheme were published for consultation by the Department of Finance in June 2025. Over a 12-week period from 17 June 2025 to 12 September 2025, everyone across Northern Ireland was provided with an opportunity to give their views. We greatly appreciate the time taken and effort made by those individuals and organisations who submitted responses and those who took the time to attend in-person and virtual focus groups. This report summarises the views expressed by respondents. The findings have helped us shape the policy content and parameters for the Baby Loss Certificate Scheme, to ensure that it best meets the needs and expectations of those the scheme is designed to help. In total, 1182 written responses were received: 1117 from individuals and 65 from organisations; 1129 of these were received via the online Citizen Space Survey.

Consultation Findings

Overall, the quantitative responses to the consultation showed clear preferences in relation to the parameters and content that were asked about. These responses have helped to clarify respondent's views on important aspects of the scheme and, in the main, have confirmed the Departments initial views. Responses confirming the Department's first position on several matters ranged from 55% to more than 95%, as shown in table 1 below.

Table 1 - Overview of all Qualitative Responses

Ques No.	Question	Yes	No	No Opinion
Q1	Do you believe that anyone other than the parent(s) should be able to apply for a baby loss certificate? This might include grandparents or siblings, for instance.	35%	55%	10%
Q2	Do you think there should be a minimum age requirement to apply for a certificate?	12%	84%	4%
Q3	Do you think the Baby Loss Certificate Scheme should be open for any early pregnancy loss regardless of how long ago it may have occurred?	95%	3%	2%
Q6	The proposed Baby Loss Certificate will include information provided to us by the applicant. We recognise that not all of the information will be available for every loss: Information such as Baby Name or Sex may not be known or provided. Do you think that all sections on the Certificate should always be included, even if some of the information isn't available? This would mean that some parts of the certificate might be left blank.	50%	40%	10%
Q8	The Department proposes that first copies of Baby Loss certificates should be free to applicants. Do you agree?	96%	2%	2%
Q9	Do you feel it is reasonable to charge a fee for applications for a duplicate Baby Loss Certificate?	70%	25%	5%
Q10	Do you feel it is reasonable to charge a fee for the amendment of a Baby Loss Certificate (e.g. correction of any errors, or inclusion of further information omitted previously)?	38%	57%	5%
Q11	Do you feel it is reasonable to charge a fee for faster processing and delivery of a Baby Loss Certificate?	45%	48%	7%

To ensure that the qualitative responses to the consultation – which included questions where users were invited to add comments in text – were effectively included in our analysis, we used different approaches. Firstly, all the responses were considered individually by the consultation team. This gave us an important overview of the nature of the responses. It also enabled us to pass comments which, while important, were not relevant to the consultation, to the relevant department. Secondly, we conducted a manual thematic analysis of the more than 2000 text responses, supported by an automated thematic analysis using a set of artificial intelligence tools. Further details on our approach are included in the methodology section.

The results from these analyses underscored the importance of the proposed scheme to people living here. Among the responses were a large number of personal stories and accounts of individual experiences, which demonstrated the strength of feeling behind this scheme. The substantive points raised included practical considerations,

the accessibility of the new Scheme, and the importance of recognising and validating losses – as well as comments which expressed frustration at the length of time taken to get a scheme of this kind operational here.

Next Steps

Given the purpose of the consultation exercise, the next steps in the process are to revisit the starting policy position from the consultation document, having reflected on the findings of the consultation. Supplied with a greater understanding of the needs and expectations of those who have experienced a loss, we will consider each of the key elements of the scheme and make the necessary adjustments where required on the basis of what we have learned.

Overall, there is considerable alignment between the key findings of the consultation exercise and our original proposals. The learnings that have been drawn out have highlighted several adjustments that can be made to improve the scheme and make it more aligned to the needs of anyone who has been affected by a loss of this kind – whether in terms of the content and tone of the certificates themselves or with regard to the scheme’s eligibility criteria. We will incorporate the alterations into the draft Baby Loss Certificate Scheme Regulations that will underpin the scheme and provide the legal framework to proceed.

Section 1: Introduction

Consultation on the draft Content and Parameters for a Baby Loss Certificate Scheme

In line with best practice policy making, the draft content and parameters for a Baby Loss Certificate Scheme were subject to public consultation, over a 12-week period from 17 June 2025 – 12 September 2025. During this time, individuals and organisations across Northern Ireland had the opportunity to consider and give their views on the proposed scheme.

The consultation was designed to encourage feedback on key components of the draft scheme. It included proposals for eligibility criteria, on the details to be included in a certificate, the format for certificates, data retention and usage, and possible fees. To increase awareness of the consultation, it was promoted online with an extensive social media campaign and press releases issued by the Department.

NISRA Statisticians were engaged by the consultation team to provide independent qualitative and quantitative analysis of the consultation responses in line with good practice guidance. A combination of quantitative analysis and thematic analysis was used to ensure the data was thoroughly considered. The consultation findings will be used to revise the original policy content and parameters to inform the development of the Baby Loss Certificate Scheme.

Overview of Consultation Responses

Most responses to the public consultation were received via a survey hosted on the Citizen Space platform. In recognition of the fact that not all sections of society have access to or the ability to complete surveys online, respondents were also advised that they could respond via email or in writing. Responses and feedback were also gathered at in-person and online stakeholder engagement sessions.

In total, 1182 responses were received, of which 65 (5%) were from organisations and 1117 (95%) from individuals. A total of 1129 responses were received via the online Citizen Space Survey. Of the respondents, 973 elected to tell us that they have been personally affected by baby loss prior to the end of the 24th week of pregnancy. This group represents 82% of the responses received and highlights the strength of feeling

amongst those directly impacted and the desire for acknowledgement and validation that we saw reflected in the comments. In term of location, 97% of responses were provided by current residents across Northern Ireland.

It should be noted that respondents to public consultations are self-selecting and, therefore, the results may not necessarily be representative of the wider population. They are, however, a clear indicator of the range and strength of views in relation to the Scheme and its proposed contents.

Report Structure

This report presents the quantitative and qualitative findings of the responses to the Baby Loss Certificate Scheme for Northern Ireland Consultation as follows:

Section 2: Methodology – a description of the processes undertaken for the quantitative and qualitative analysis.

Section 3: Analysis of Consultation Responses by Question: Quantitative and qualitative analysis of all survey questions as appropriate.

Section 4: Conclusions

Section 2: Methodology

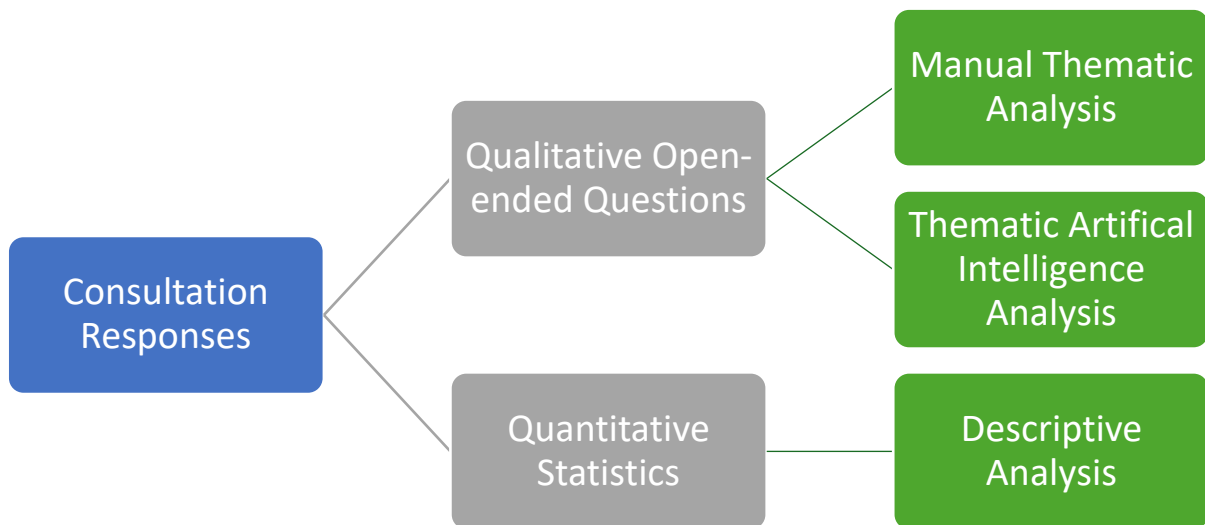
Overview

Both quantitative and qualitative approaches were used to analyse the consultation responses, as appropriate to the structure and format of the question posed to respondents.

The quantitative analysis of the consultation responses focused primarily on the categorical questions which were posed. This analysis enabled us to form assessments about what fraction of respondents supported the different options presented. These analyses were updated regularly through the consultation window and are presented in tabular and graphical format below.

The qualitative segment of the analysis focused on the text responses which were provided to the consultation. These ranged in length, included some personal accounts of how Baby Loss had affected individuals and set out thoughts on the proposed certificate scheme in long-hand. To analyse these responses, we considered each of the more than 2000 such responses individually, and supplemented this work with a thematic analysis carried out by NISRA statisticians along with some controlled use of a large language model artificial intelligence tool. Using these two approaches helped to broaden the analysis of open-ended responses and provided other indicators to convey meaning, relevance and context. This approach complemented the quantitative analysis by providing more in-depth understanding of the responses received (see Figure 3).

Figure 3: Overview of Analysis Completed



This broad approach was of particular value where the consultation asked whether respondents had additional views or comments on the draft scheme that they wanted to add. Asking open-ended questions gave respondents the space to provide a more in-depth understanding of both the immediate and longer-term impacts of baby loss on their lives and their views on any difference that they feel the introduction of a certificate scheme may have. These responses helped us to gain more understanding of the depth and strength of feeling that those who engaged with the consultation exercise because of their own personal experience. It also assisted in recognising how this shapes their view of the likely impact of the proposal to introduce a Baby Loss Certificate Scheme along with the factors they consider critical in ensuring that it is fit for purpose.

Section 3: Analysis of Consultation Responses by Question

Part 1 – Eligibility

Q1. *Do you believe that anyone other than the parent(s) should be able to apply for a baby loss certificate? This might include grandparents or siblings, for instance.*

Chart 1 – Should anyone other than the parent(s) be able to apply for a baby loss certificate?

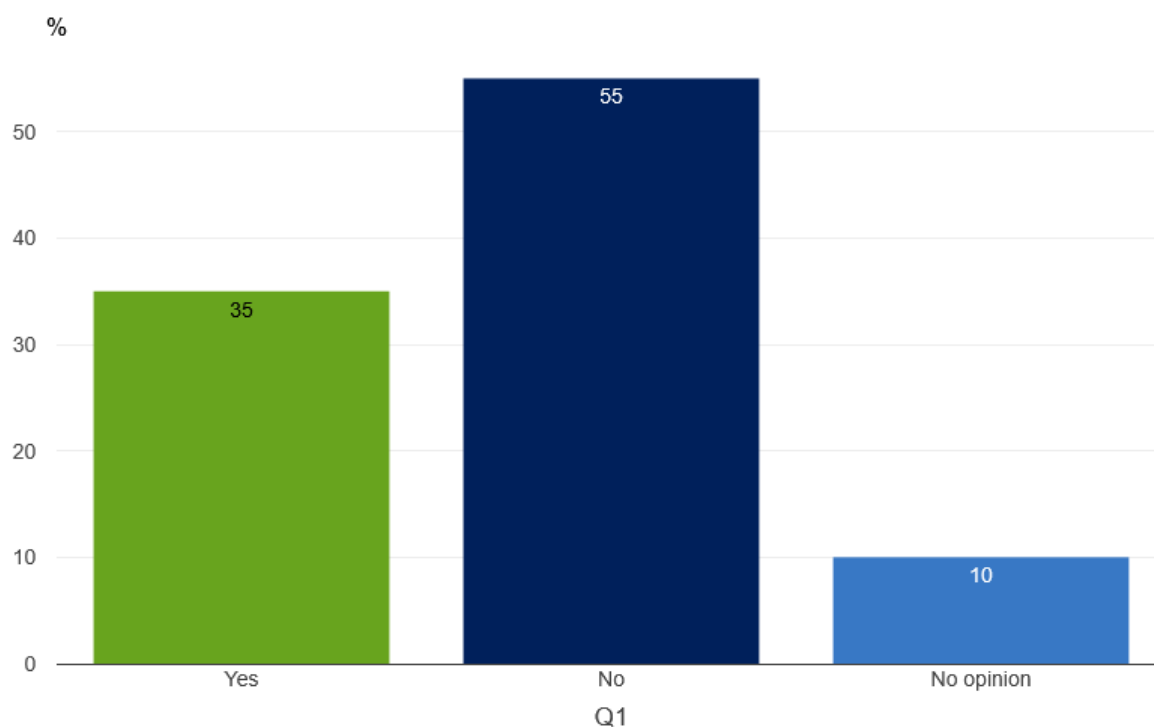


Chart 1 shows majority support of 55% for ensuring that only the direct parents can apply for a baby loss certificate. A large minority of 35% indicated that they think other parties should also be able to apply. Further investigation of the latter group found that 15% of all respondents to the consultation had indicated immediate family members such as grandparents or siblings. 2% of consultation respondents had stated that anyone should be able to apply provided they have the permission of the parents, and 3% had suggested that close friends of the parents should be able to apply on their behalf.

Q2. Do you think there should be a minimum age requirement to apply for a certificate?

Chart 2 – Should there be a minimum age for application?

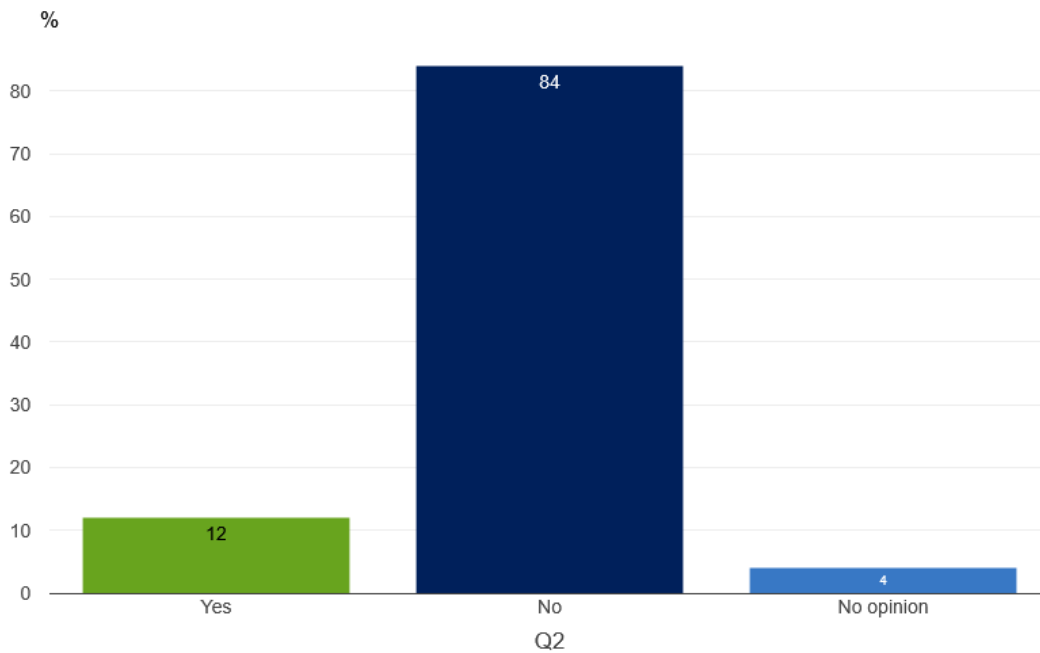


Chart 2 shows an overwhelming majority of 84% of respondents indicated that the Baby Loss Certificate Scheme should not apply a minimum age criterion for eligibility. This level of support was consistent across all respondents, whether individuals or those responding on behalf of organisations within the sector.

Q3. Do you think the Baby Loss Certificate Scheme should be open for **any** early pregnancy loss regardless of how long ago it may have occurred?

Chart 3 – Should historic losses with no limit be included in the scheme?

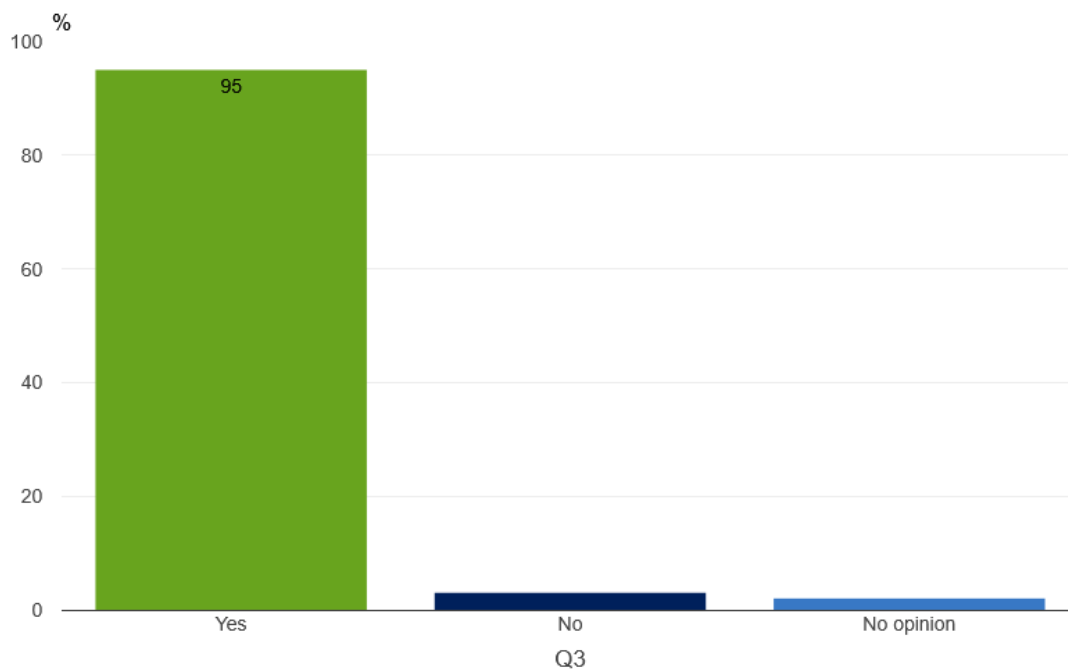


Chart 3 illustrates that 95% respondents agreed that the Baby Loss Certificate Scheme should be open to any losses regardless of how long ago they may have occurred. This represents a near unanimous support for not applying any form of eligibility restriction in this area.

Q4. *Who do you believe that the Baby Loss Certificate scheme should be open to?*

Chart 4 - Geographical criteria for the Baby Loss Certificate Scheme



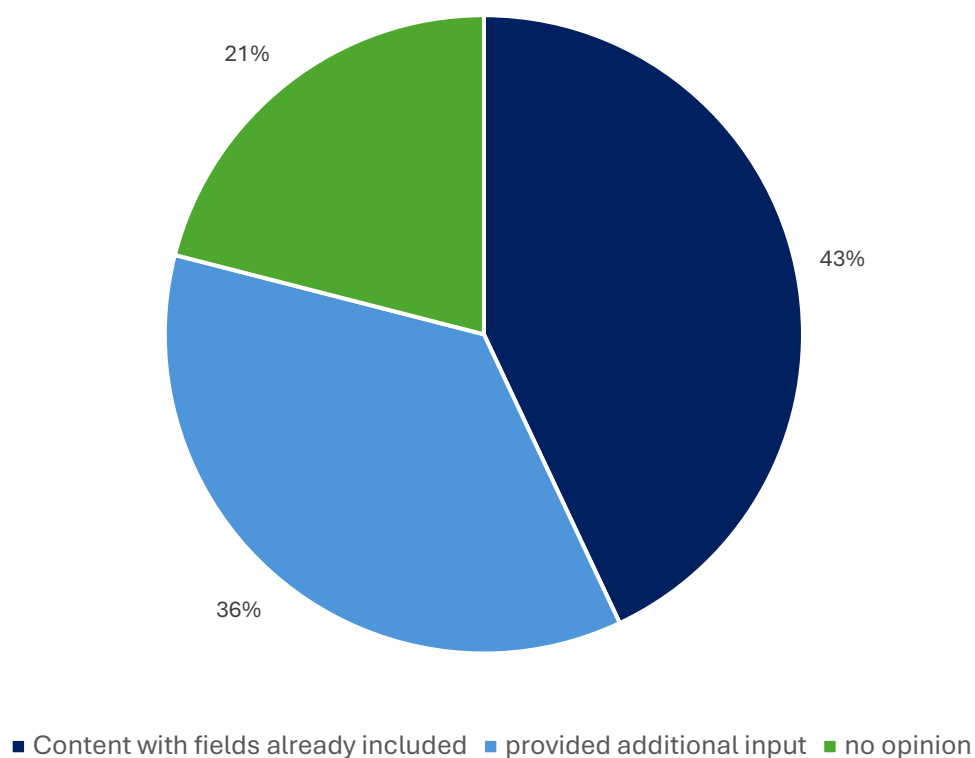
In Chart 4 we can see that a significant majority, 70%, of respondents (both individuals and organisations) view the scheme as one that should be available to all residents of Northern Ireland and also non-residents who experienced their loss whilst in Northern Ireland.

In addition, during key stakeholder engagement exercises an additional group of potentially qualifying individuals were also brought to the Department's attention. It was suggested in these sessions that non-resident cross-border workers who qualify for NHS care in Northern Ireland should also be able to apply for a baby loss certificate, even if they experienced their loss outside of Northern Ireland.

Part 2 – Content and Format of the Baby Loss Certificate

Q5. *The information provided to us by the applicant that will appear on the Baby Loss Certificate, includes the Full Name of the parent, the Full Name of the other parent (where consent has been obtained for their details to be included), the Baby Name and Sex (where known and/or provided), the Date of Loss and the Place where the Loss occurred. Is there anything else which should be included on the Certificate?*

Chart 5 – Additional fields to be added to the baby loss certificates



From Chart 5, we can see that 43% of those who responded to this question advised that they were content with the fields that we had already included. A further 21% stated that they had no opinion on the fields to be included on the certificates. 36% indicated that they believed that additional field(s) were required.

Of those who provided some additional fields for consideration, a wide variety of suggestions were offered. These responses were analysed and grouped, and the most common suggestions drawn out are included in Table 2 below:

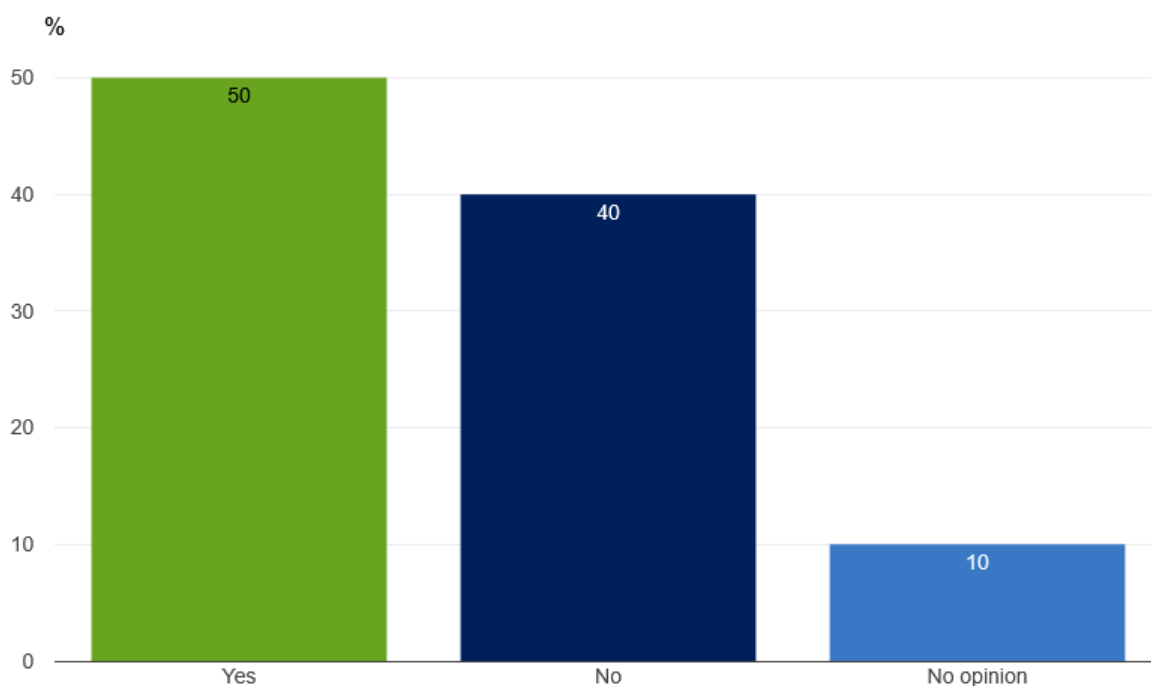
Table 2 – Suggested additional fields ranked in order of frequency

Suggested addition to certificate	Count
Due date	23
Gestational age	16
Weight of baby	13
Cause of death	11
Siblings	8
Sex of baby	8
Place of loss	7
Length of baby	7
Date of birth	6
Name of baby	3

Table 2 shows that, whilst several suggestions are already included in our original question, such as the sex of the baby or the place of loss, there were some others that should be given consideration, such as due date. These will be considered in discussions around the design and layout of the certificates.

Q6. *The proposed Baby Loss Certificate will include information provided to us by the applicant. We recognise that not all of the information will be available for every loss: Information such as Baby Name or Sex may not be known or provided. Do you think that all sections on the certificate should always be included, even if some of the information isn't available?*

Chart 6 – Inclusion of blank fields on the baby loss certificate



From Chart 6, we can see a narrow majority of 50% of respondents were in favour of including blank fields. These results indicate that there is reasonably strong support for both options presented.

Q7. *If you have any views on the format and/or layout of the Baby Loss Certificate, (including language, terminology or tone), please tell us in the space below.*

Table 3 – Key themes and comments on certificate format

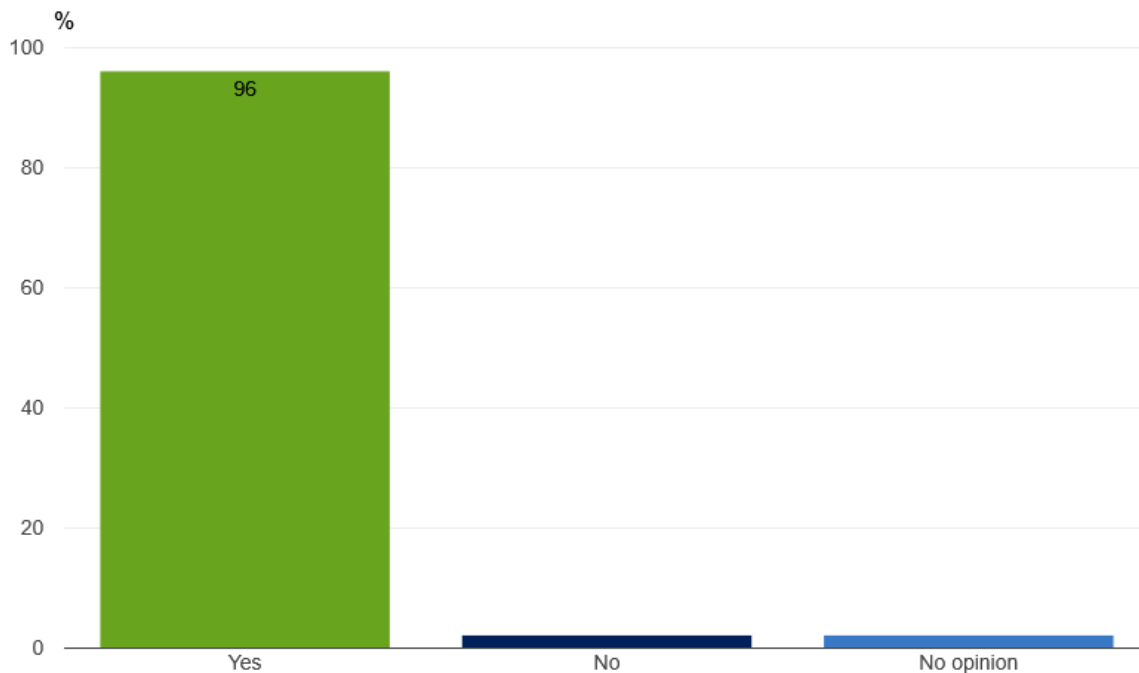
Key theme	Comment
Format and Layout Preferences	- Strong preference for the certificate to resemble a birth certificate.
	- Avoid leaving blank fields; use 'Not Known' or allow customisation.
	- Requests for multiple formats based on gestational age or available information.
	- Desire for official appearance with high-quality paper and formal layout.
Language and Terminology	- Overwhelming support for using the term 'baby' instead of clinical terms.
	- Rejection of clinical terms like 'foetus', or 'gestational period'.
	- Suggestions for sensitive alternatives such as 'born sleeping' and 'gone too soon'.
Tone	- Tone should be empathetic, gentle, and respectful.
	- Avoid overly sentimental or childish imagery.
	- Balance between formality and emotional sensitivity.
Inclusivity and Accessibility	- Requests for certificates in Irish and other languages spoken in Northern Ireland.
	- Suggestions for Braille and accessible formats.
	- Inclusive terminology to reflect diverse family structures
Additional Suggestions	- Include symbolic elements like butterflies or angel wings.
	- Option to add personal messages or quotes.
	- Recognition of all types of losses.

The responses to Question 7 were considered individually and then grouped using a thematic analysis AI tool. Table 7 shows the key themes identified and the most common comments provided. This gives a good insight into the strongly held views of those who chose to answer this question. It is clear that a large proportion of respondents want the certificates to have a formal layout and look, closely aligned to existing official life event certificates, whilst at the same time using softer language and tone that avoids the use of clinical terms. All of the feedback provided will be used to shape the design of the certificates for the scheme.

Part 3 – Potential charging of Fees

Q8. *The Department proposes that first copies of Baby Loss certificates should be free to applicants. Do you agree?*

Chart 7 – No fee for first Baby Loss Certificate



As demonstrated by Chart 7, a near unanimous 96% of respondents stated that they agree with the Departmental view that there should not be a fee for a first baby loss certificate application.

Q9. Do you feel it is reasonable to charge a fee for applications for a duplicate Baby Loss Certificate?

Chart 8 – Fee for duplicate certificate

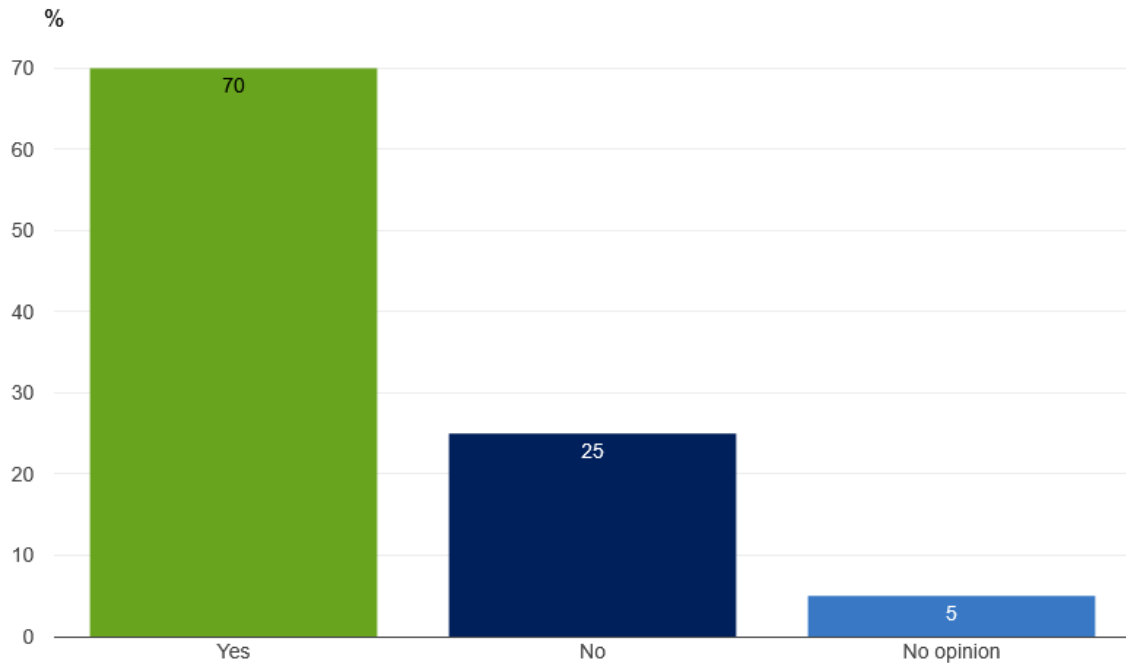
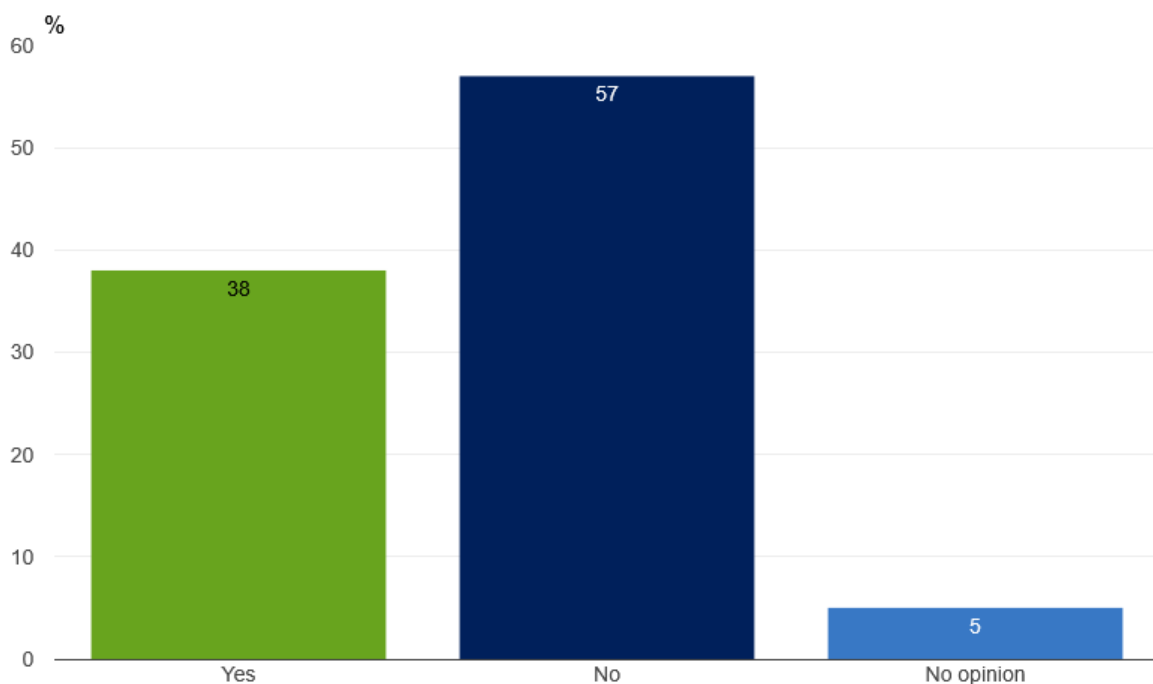


Chart 8 illustrates that a considerable majority of 70% of respondents consider it to be reasonable to charge a fee for duplicate certificates. This response is consistent with existing policy in respect of life events certificates.

Q10. Do you feel it is reasonable to charge a fee for the amendment of a Baby Loss Certificate (e.g. correction of any errors, or inclusion of further information omitted previously)?

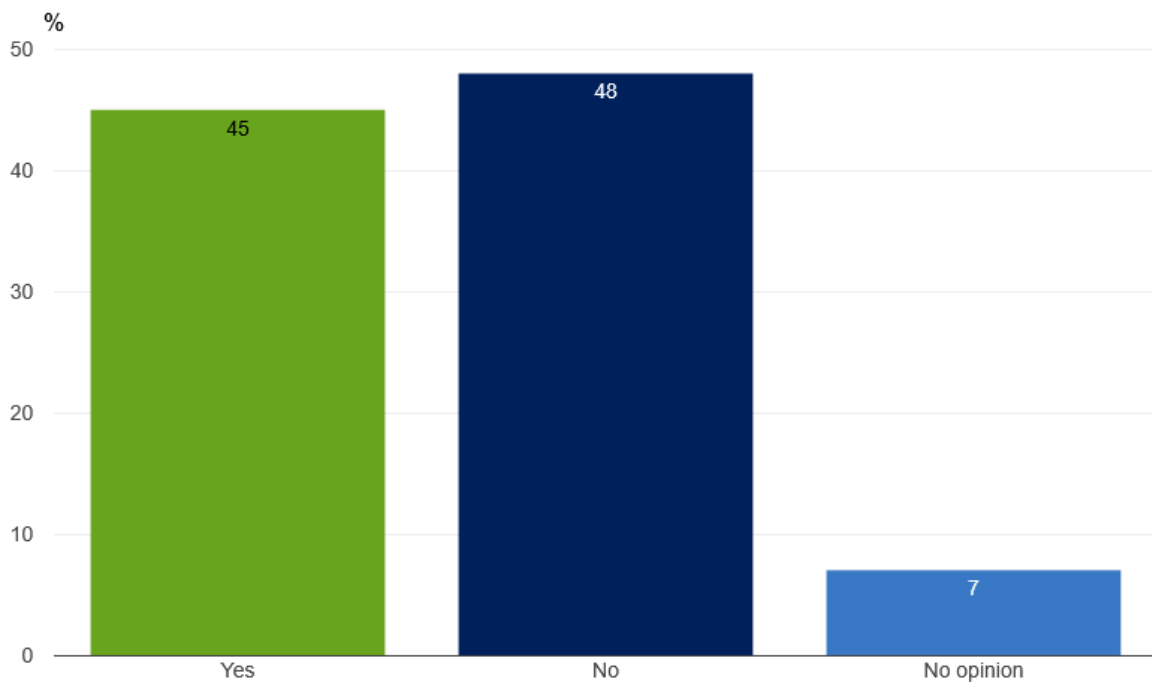
Chart 9 – Fee for amendments to certificate



With respect to question 10, Chart 9 demonstrates that a majority of respondents (57%) considered that it would not be reasonable to charge for making amendments to certificates. A large minority (38%) supported the idea of charging for amending certificates.

Q11. *Do you feel it is reasonable to charge a fee for faster processing and delivery of a Baby Loss Certificate?*

Chart 10 – Fee for express processing service



Responses to Question 11 – which asked whether it was reasonable to charge a fee for faster processing and delivery of a certificate – were very evenly balanced. Chart 10 indicates that the response option with the greatest support is *No*, but that this response group fell short of an overall majority of responses. 45% of respondents indicated that they considered a charge of this nature reasonable, and 7% expressed no opinion. The responses to this question suggest that there is no clear consensus about the question of fees for an express processing service.

Part 4 – A ‘Memorial book’ and Data Protection

Q12. *From the point of application, for how long do you feel that the information should be retained by the Department?*

Chart 11 – Retention Periods for data collected during application process

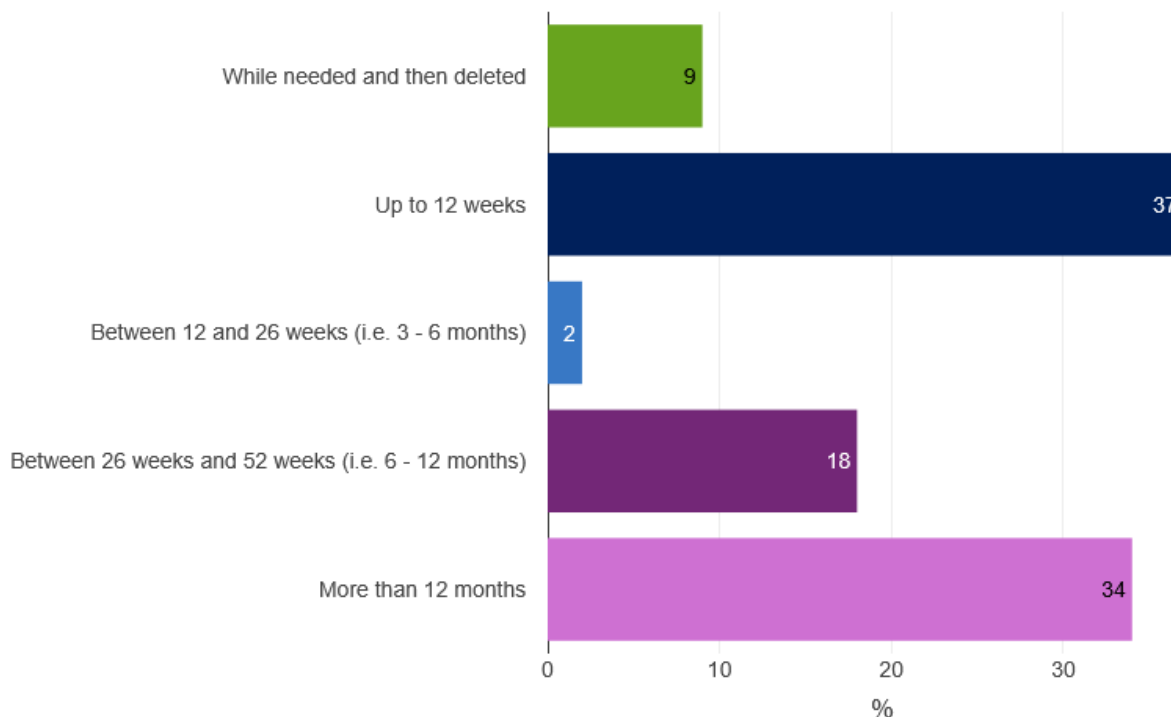
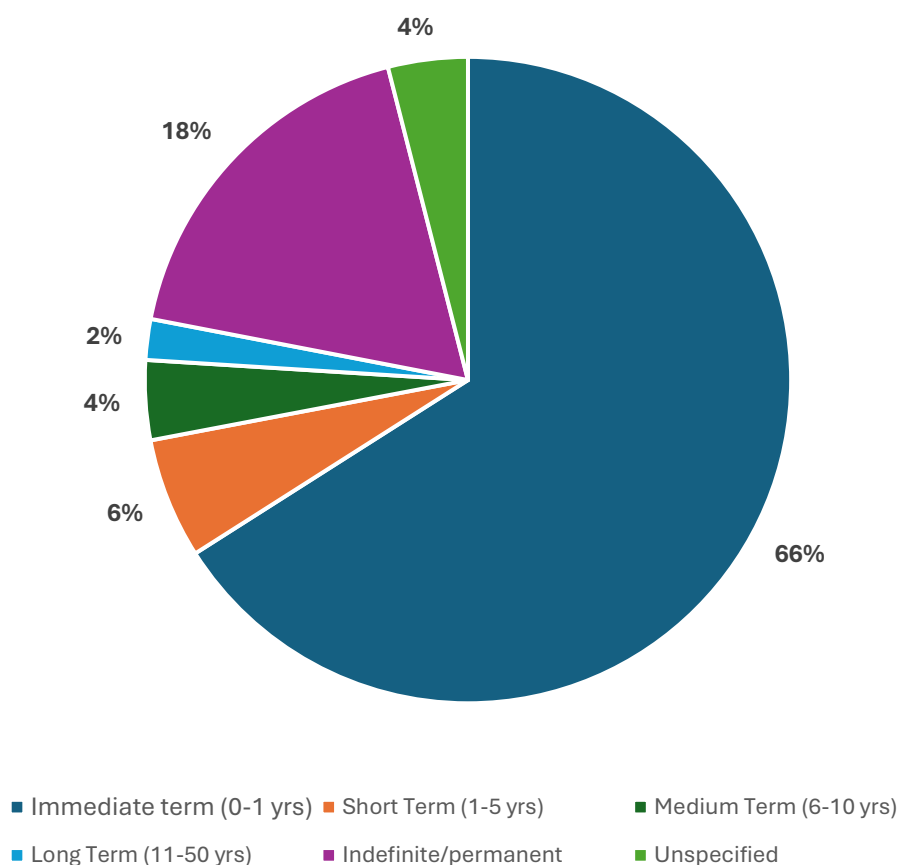


Chart 11 shows the range of responses to the question about how long data provided by applicants should be held. Whilst no one option achieved a majority, two response categories stand out: 37% of respondents indicated a retention period of “*up to 12 weeks*” and 34% indicated “*more than 12 months*”. For respondents who wanted the data to be held for more than 12 months, further questions were posed on both how much longer than 12 months would be appropriate, and the rationale for their preference. Our analysis of these responses is detailed below in Chart 12, which shows that while the majority of responses preferred a short retention window, a considerable minority preferred a much longer retention period. Just less than one-in-five respondents preferred indefinite retention, similar to other life event registrations.

Chart 12 – Preferred extended time period classifications



The consultation also provided respondents with the opportunity to give detail about why they had chosen their preferred length of time and the reasoning behind their stated preference. Responses to this question were considered individually, and a thematic AI analysis tool was used to identify the key themes and the most common views expressed. Below is a summary by theme of the key things we learned.

1. Recognition and Respect

A considerable number of respondents referenced acknowledgement of their baby's existence in the context of this data retention question. Many emphasized that they felt retaining information would validate the life and loss, regardless of at what stage in the pregnancy the baby was lost. Several comments provided also argued that baby loss not covered under the definition of still-birth should be considered equal to any other significant life event, be it birth or death. Of all the reasons given for retaining information long term or permanently, this was the most common.

2. Record Keeping and Accessibility

A common consideration raised was ensuring that the data would be available to enable access to replacement certificates if the original is lost or damaged. Several respondents highlighted their view that records should be retained for a medium to long term period to allow time for grieving and decision-making by those impacted by a loss.

3. Grief and Emotional Processing

Many responses highlighted that the data collected should be retained for a longer period of time, as grief is unpredictable and varies greatly; therefore, some people affected may not be ready to complete an application for a certificate until months or years later. The emotional toll of baby loss means that administrative tasks may be delayed, and flexibility is needed.

4. Family and Future Generations

Some respondents stated that they believed it to be important to retain these records for future generations, including siblings and descendants.

5. Research and Public Health

Finally, several respondents told us that they believed that retaining data could help improve understanding of baby loss rates and inform healthcare services.

Part 5 – Other comments or observations not covered by preceding Parts

Q14. *Please tell us any information or comments you would like us to consider as we proceed in establishing the Scheme.*

In the final section of the consultation questionnaire, we provided respondents with a space to write any other thoughts, input or comments that they felt to be relevant to any part of the proposed scheme. With this section being so open, the variance in the responses was significant; however, our analysis identified key themes that most responses touched upon. Given the open nature of the field, many responses touched upon several themes at once and this is reflected in the themes included in Chart 13 below:

Chart 13 – Key themes in further comments

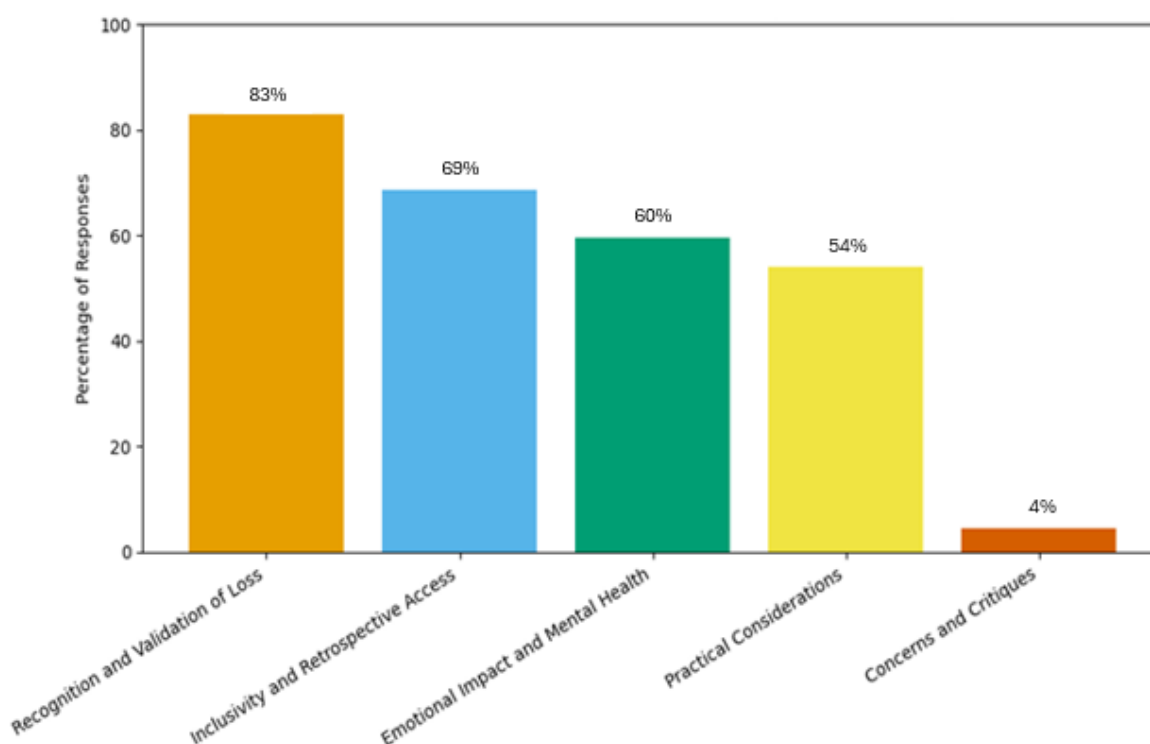


Chart 13 shows a similar trend as that found in the further replies to question 12, with recognition and validation the dominant theme of the responses received. There is strong feeling in this area, with a significant number of respondents expressing how the introduction of this scheme will make them feel in terms of recognising and validating the loss they experienced. Some of the key themes in each category are set out in Table 4 below.

Table 4 – Examples of comments by Key Theme

Theme	Comment
Recognition and Validation of Loss	<ul style="list-style-type: none"> • The feelings of the parents are considered throughout this process. A comfort will be brought to many who have suffered to know their child existed no matter what stage their pregnancy was at. • Acknowledgement of the child that was meant to be could possibly provide a small amount of comfort to the parents at one of the most heartbreaking times of their lives.
Inclusivity and Retrospective Access	<ul style="list-style-type: none"> • I hope this scheme will be historic, in that there will be no cut-off date. I know that women who are now in their 80s and even 90s would value this certificate. You never forget. • It is essential that parents/families can receive a certificate for babies lost before this scheme come into effect, irrespective of how long ago their loss was.
Emotional impact and Mental Health	<ul style="list-style-type: none"> • This scheme can only be a positive step in healing this emotional/mental trauma. • Until you've lost a child no matter how early you will never understand the loneliness, heartache, and mental hurt that occurs that never goes away and as a grieving parent that acknowledgement that your baby was someone by a certificate means the world.
Practical Consideration	<ul style="list-style-type: none"> • Get it rolled out as soon as possible. • This should be easy to apply for and any direct contact with applicants needs to be in the context and upon the understanding that the applicant is likely a grieving recently expectant parent.
Concerns and Critiques	<ul style="list-style-type: none"> • It's disappointing that it's 2025 and only now is this consultation coming about. • How to verify losses - in case the scheme is misused / used wrongfully in any way.

Further analysis of the responses using sentiment analysis and Artificial Intelligence offered some additional insight into the reactions and emotion respondents displayed as they provided their comments on the proposed scheme. Overall, the vast majority of those who responded welcomed the scheme as a compassionate way for government to acknowledge the loss that has been experienced and offer comfort to those impacted. Many respondents took the opportunity to share their own personal experiences, and whilst there is a significant amount of grief and pain associated with that a great many expressed hope for the positive difference that they believe the introduction of this scheme can make.

Section 4: Conclusion

This consultation exercise set out to gather views from the public on the operational parameters of the proposed Baby Loss Certificate Scheme. Over a 12-week period from 17 June 2025 to 12 September 2025, everyone across Northern Ireland was provided with an opportunity to give their views. We greatly appreciate the time taken and effort made by those individuals and organisations who submitted responses and those who took the time to attend in-person and virtual focus groups.

The findings will help us to shape the policy content and parameters for the Baby Loss Certificate Scheme, to ensure that it best meets the needs and expectations of those the scheme is designed to help. In total, 1182 written responses were received: 1117 from individuals and 65 from organisations; 1129 of these were received via the online Citizen Space Survey.

To produce this report, we have utilised both quantitative analysis of the responses to the categorical questions posed, and thematic, qualitative analytical tools. The quantitative analysis will help us to shape and confirm important details of the scheme. Utilising a variety of traditional and innovative approaches to analyse the free text responses has also allowed us to better understand the emotion and sentiment behind the comments.

Overall, the quantitative responses to the consultation on the draft parameters for the Baby Loss Certificate Scheme showed strong support for aspects of the scheme already under consideration and gave useful information about preferences for the design elements of the operation of the scheme and the certificates themselves. There is considerable alignment between the key findings of the consultation exercise and the Departments original proposals.

The learnings that have been drawn out have raised several adjustments that can be made to improve the scheme and make it more aligned to the needs of anyone who has been affected by a loss of this kind – whether in terms of the content and tone of the certificates themselves or with regard to the scheme’s eligibility criteria.

The Department will incorporate these alterations into the draft Baby Loss Certificate Scheme Regulations that will underpin the scheme and provide the legal framework to proceed. We are very grateful to the large number of respondents who took part in

the consultation, and we look forward to bringing forward our proposals to operationalise the scheme.