

SAIFCharter's response to the Competition and Markets Authority 'Statement of Scope' consultation.

1. Introduction

This response is submitted on behalf of SAIFCharter, an association of 740 independent funeral directors across the UK, of varying size, who are both members of the National Society of Allied & Independent Funeral Directors (SAIF) and shareholders of Golden Charter Ltd., a sector-leading pre-paid funeral planning firm, through which over 3,000 independent funeral directors accept pre-paid funeral plans.

Before detailing our substantive response, SAIFCharter would like to offer the following definition of a funeral director:

'Funeral directors transport, store, and prepare the deceased for burial or cremation, and support the bereaved at their time of loss. Alongside the provision of these direct services, funeral directors liaise with third parties to arrange and oversee all aspects of the funeral service. This can include paying upfront fees on behalf of consumers for the services of florists, musicians and celebrants, along with burial or crematoria charges, and the costs of venue hire for both the service and the wake. By providing a single point of contact through which the bereaved can arrange all aspects of a funeral service, funeral directors ease the burden placed on grieving families at a difficult time and, often, in the period after, through structured, locally delivered bereavement support.'

We hope that this definition illustrates the breadth of activities carried out by funeral directors; the value, practical as well as emotional, that those services offer grieving families, and the financial risk that funeral directors manage on behalf of consumers.

SAIFCharter welcomes the CMA market study into the funeral market. Further, SAIFCharter notes the CMA proposal for the study to focus on:

- 1) the supply of funerals in the at-need market
- 2) the supply of cremation services by both private firms and by, or on behalf of, local authorities.

Given that, for a majority of consumers, their point of engagement with the funeral market continues to be at the time of need, SAIFCharter's response to the CMA Statement of Scope will focus predominantly on the at-need market, with some limited comments on crematoria.

With this in mind, please find below some general comments on the Statement of Scope, followed by answers to the fourteen questions on the at-need market, set out by the CMA at section-47 and section-48 of the Statement of Scope.

2. General Comments

SAIFCharter welcomes the CMA market study and is in broad agreement with the proposed scope. In welcoming the study, SAIFCharter requests that the following points are taken into consideration:

2.1. Quality of service and levels of care are more important to consumers than costs.

The Statement of Scope, justifiably, has a focus on funeral costs. Given the increase in funeral costs over the past decade, particularly burial and cremation fees, SAIFCharter supports any proposal which will spotlight the root-causes of funeral inflation. SAIFCharter also recognises, however, that a funeral is an emotional purchase. As such, the quality of care offered by the funeral director, the time funeral director spends with the bereaved, the ease with which the service is assembled, the funeral director's ability to meet specific religious, cultural or geographic requirements, and the care that is taken to honour the memory of the deceased will contribute to consumer satisfaction, above and beyond costs.

Particularly, the importance of the bereavement process for the mental health and well-being of grieving families should be noted. This is especially true for families that have experienced sudden or violent losses, including disasters and military losses¹. In such cases the process of a funeral is central to the healing process. Furthermore, a 2015 study into the support needs of 678 bereaved people found that, after family and friends, funeral directors were the most common source of support for the bereaved, concluding that 'the high level of reported support from funeral directors deserves further investigation'². Taking this into consideration, SAIFCharter believes that quality of service and levels of care and support should be an equal focus of the market study.

2.2. Variation in demand means that no two funerals are the same.

It should be noted that the services consumers seek can vary significantly depending on cultural and family traditions, socioeconomic profile, including the age of the deceased, and on localised geographical trends and traditions. It is in this context, of varying demand and circumstances, that funeral costs are often provided as estimates.

Currently, there are no formal guidelines on what services and products should be included in a standard funeral for promotional and advertisement purposes, and as such

¹ Kristensen, Weisæth, and Heir, T. (2012). 'Bereavement and Mental Health after Sudden and Violent Losses: A Review'. *Psychiatry*. Volume 75. Issue. Pages 76-97.

² Aoun, S., Breen, J., Howling, D., Rumbold, B., McNamara, B. & Hegney, D. (2015), 'Who needs bereavement support? A population based survey of bereavement risk and support need'. *PLoS one*. Volume 10. Issue 3. Pages 11-14.

it can be difficult for consumers to make like-for-like comparisons. An agreed definition on what services and products should be included could facilitate more effective price comparisons for consumers. It should be noted, however, that as funeral trends evolve agreed definitions on what services and products should be included can quickly become outdated. With this in mind, any profession-wide agreed definitions would have to be monitored against emerging funeral trends and refreshed regularly.

2.3. Industry transparency must be improved.

SAIFCharter welcomes efforts to improve price transparency and ease consumer cost comparisons between providers. In the same spirit, SAIFCharter believes that, in order to facilitate better price transparency and cost comparisons, advertising practices within the industry should also be examined to ensure, for example, that funeral directors provide clarity on ownership. Consumers often choose an independent funeral director over a corporate brand as they consider an independent to be a more personal choice when making a purchase in which they are emotionally invested, yet there are cases of national brands marketing branches as stand-alone independent funeral directors. Likewise, more clarity is required with some product descriptions, for example clarifying the difference between wood-effect, wood-veneer, and solid-wood coffins.

2.4. Barriers to entry in the crematoria market remain

While this response is primarily focused on the services offered by funeral directors in the at-need market, SAIFCharter welcomes the CMA indication that the market study will also focus on crematoria costs. As detailed below, average crematorium costs increased by a third between 2010 and 2015, impacting significantly on overall funeral costs and, therefore, on consumers. It should be noted, however, that crematoria costs vary significantly both within and between the nations and regions of the UK, impacting on overall funeral price comparisons. SAIFCharter further notes that there are a number of barriers to entry in the crematoria market, including current planning restrictions and legislation on mercury abatement. Identifying ways in which new entrants to the crematoria market could be supported may facilitate greater competition and extend choice for consumers.

3. 'Statement of Scope' questions on the at-need funeral market

a) Why have funeral prices generally increased?

Independent funeral directors' fees have seen below inflation increases – averaging 2.3% per annum – over the past three years³. In contrast, the average cost of a cremation at a

³ This figure, provided by Golden Charter, is based on a Standard Funeral Plan at today's prices, excluding burial/ cremation fees, and excluding Golden Charter's administrative costs.

public crematorium increased by a third between 2010 and 2015⁴. Between 2016 and 2017 alone, there was a 7.9% increase in the average cremation fee, and a 5.6% increase in average burial fee recorded across the UK⁵. In Scotland, Citizen's Advice noted a 26.9% average rise in burial charges, and a 17% average increase in crematorium charges between 2014 and 2017⁶.

In assessing why burial and crematoria fees have risen above the rate of inflation, research suggests that local government, NHS Trust, and Coroner's Office budget cuts are contributing factors. Specifically, without adequate funding from central government, local authorities are increasingly forced to operate such services on a profit-making basis, so as to fund other local government functions⁷. A land deficit for new graves, particularly in urban areas, has also driven up costs for burial sites⁸. Indeed, in some densely populated local authority areas including parts of inner London, space restrictions mean that a traditional burial is no longer even an option. While such third party fees may be the principal factors driving overall cost increases, consumers primarily pay for third party costs via their funeral director. This could result in consumers attributing cost increases wrongly to funeral directors, which may, in turn, be negatively impacting public perceptions of the profession. Therefore, SAIFCharter is keen to see a holistic examination of the funeral market, with cost increases investigated across the supply chain and in each segment of the industry.

It should also be noted that, as a consequence of additional legal requirements around the death certification process for cremations, with a second doctor now obligated to make direct contact with the next-of-kin before the certificate can be issued, waiting times for certification have increased, resulting in independent funeral directors maintaining the deceased for longer and adding cost.

Third party resource pressures in cemeteries and crematoria have had a similar impact. Some local authorities, for example, have lead times of up to four days to open an existing lair and will only allow one burial per hour, without overlap. Independent funeral directors have further observed clusters of cemeteries sharing a 'floating squad' of gravediggers, aggravating time pressures further, with cemeteries limited to two burials per day in such cases. Consequently, our members report that, while a decade ago it would take on average three days to arrange a funeral, it is now common for arrangements to take two to three weeks.

b) What explains certain large funeral price differences between funeral directors in the

4 BBC News. (August 2015). Cost of public cremation rises by a third. BBC.co.uk.

5 Critical research. (2017). Cost of Dying report 2017. 11th Edition. Sun Life.

6 Citizens Advice Scotland. (December 2017). The Cost of Saying Goodbye 2017. The Scottish Association of Citizens Advice Bureaux.

7 Critical research. (2017). Cost of Dying report 2017. 11th Edition. Sun Life.

8 Rugg, J. and Pleace, N. (2016). *An Audit of London Burial Provision: a report for the Greater London Authority*. Cemetery Research Group. University of York

same local area?

A number of factors may explain the price differentials between funeral directors in the same locality. Firstly, it should be noted that, in most towns and cities, the services consumers seek can vary significantly, depending on cultural and family traditions, socioeconomic profile, demographic preferences, and on localised trends. Many independent funeral directors operate in areas of high deprivation where up to a third of their clients can be in receipt of DWP funeral benefit. While demand for bespoke, premium services can still be high in such catchment areas, consumers' ability to pay for such premium services is reduced, particularly due to the current cap on funeral benefits. This, in turn, impacts on the products and services on offer and, therefore, on overall costs.

Conversely, some funeral directors may offer a premium service, targeting affluent areas within their locality. Such a premium service may include additional costs associated with the upkeep of larger premises, spending more time supporting bereaved families, having a wider range of high-end coffins, and offering a number of memorial and 'personalisation' options as part of a bespoke service.

Finally, it should be noted that pockets of deprivation often exist, even within otherwise affluent catchment areas. As such, funeral directors operating within the same locality can service very different constituencies, in terms of the socioeconomic profile of their customer base, thus generating varying costs within the same locality.

c) In what settings and under what circumstances do consumers decide which funeral director to contact?

Consumers often decide which funeral director to contact in unfamiliar surroundings – a hospice, hospital, or care home – and in a state of distress, where immediate assistance is required, particularly around care of the deceased. In such circumstances, local availability, previous family experience, and recommendations – often from care home and hospital staff - are primary driving factors in the decision-making process.

It is broadly recognised that procuring a funeral in the 'at-need' market is an emotional purchase⁹ and, as such, the choices consumers make are based not on cost alone, but on quality of service and the level of care¹⁰. Consumers often choose a funeral director they know and trust. This may be, for example, an independent funeral director based within their local community which the family has used before. Indeed, research suggests that a consumer's previous experience or inexperience of organising a funeral is an important factor in determining the choices they will make, with more experienced consumers having a stronger sense of what they want, and what they are willing to spend¹¹. A growing trend

9 Corden, A. and Hirst, M. (2015). 'The Meaning of Funeral Poverty: an exploratory study'. York. University of York Social Policy Research Unit. Pages 1-36.

10 Ruth McManus & Cyril Schafer. (2014). 'Final arrangements: examining debt and distress'. Mortality. Volume 19. Issue 4. Pages 379-397.

11 Ruth McManus & Cyril Schafer. (2014). 'Final arrangements: examining debt and distress'. Mortality. Volume 19. Issue 4. Pages 379-397.

towards personalisation of funeral services¹², and the religious belief of the deceased¹³ can also be contributing factors in the decisions consumers make, as they seek out funeral directors who offer specific personalisation services or cater towards a particular faith-based community.

Lastly, it should be noted that pre-paid funeral plans offer consumers an alternative to the time pressured, emotionally charged circumstances of an 'at-need' purchase, with research showing that countries which have 'a culture of preparing for death' have lower levels of funeral poverty and lower costs for consumers.¹⁴ They also offer the consumer the option of pre-choosing a funeral director long before the emotionally-charged period immediately after a bereavement.

d) What factors are important to them in making that choice? How far (in terms of distance / time) are consumers prepared to travel to reach a funeral director? Do consumers have sufficient information on the alternative funeral directors available locally?

As detailed in the answer to question (g) below, funeral markets are highly localised, with consumers restricted by the practicalities of geography in relation to how far they are willing to travel. Particularly, funeral directors based some distance from the friends and family of the deceased are unlikely to be considered as viable options, regardless of how affordable their services are. Indeed, the influence of friends and family, particularly previous family experience, is often cited by independent funeral directors as a key factor in consumers' decision-making process.

Furthermore, while research suggests that many consumers are cost aware when organising a funeral, the emotional nature of the purchase means that consumers are predominantly driven by a 'sense of responsibility' to provide a 'decent send-off', rather than by purchasing the most affordable service¹⁵. It may also be the case that older consumers with previous experience of organising a funeral are more cost aware and willing to take decisions based on cost¹⁶.

e) Is sufficient information (including low cost funeral options and itemised prices) made available by funeral directors, when is it provided and does it allow for meaningful comparisons of services between funeral directors?

The National Society of Allied & Independent Funeral Directors (SAIF) and the National Association of Funeral Directors (NAFD) each have a Code of Conduct and Code of Practice,

12 Korai, B. (2017). Rethinking functionality and emotions in the service consumption process: the case of funeral services. *Services and Markets*. Volume 31. Issue 3.

13 Walter, T. (2005). Three ways to arrange a funeral: mortuary variations in the modern west. *Mortality*. Volume 10. Issue 3. Pages 173-192.

14 Valentine, C. And Woodthorpe, K. 2013. From the Cradle to the Grave - Funeral Welfare from an International Perspective. *Journal of Theoretical Social Psychology*. 48:9

15 Ruth McManus & Cyril Schafer. (2014). 'Final arrangements: examining debt and distress'. *Mortality*. Volume 19. Issue 4. Pages 379-397.

16 Ruth McManus & Cyril Schafer. (2014). 'Final arrangements: examining debt and distress'. *Mortality*. Volume 19. Issue 4. Pages 379-397.

both of which set high standards of professional conduct as part of their membership criteria.

For example, the SAIF Code of Conduct requires price lists, detailing all the services offered, to be prominently displayed so that they can easily be seen by all visitors to the premises. Such price lists must also be available for clients to take away with them or to be presented and left with them when a home visit is made. Alongside prominent price lists within premises, many independent funeral directors display price information on their website and this development is supported by SAIFCharter.

Furthermore, in explaining their full range of services to clients, SAIF members must offer the option of a simple funeral with an inexpensive coffin, and a detailed written estimate must be provided.

The SAIF Code of Conduct extract below details membership requirements on information and choice [section-4], price and price lists [section-5], and provision of estimates [section-6].

Extract from the SAIF Code of Conduct

4. Information and Choice

(4.1) Members will provide a choice of at least four coffins at varying prices, one of which will be an inexpensive and plain type, which must be shown in a brochure and displayed in a showroom wherever practicable.

(4.2) Members must explain their full range of services relevant to the particular client, including the availability of a simple funeral before giving them a written statement.

(4.3) Clients must receive full advice on all the actions, including registration, they need to take in relation to the death and funeral.

5. Price and Price Lists

(5.1) Prices must be fair and reasonable in relation to the particular goods or services supplied, thereby ensuring clients receive fair value at all times. Price lists, detailing all the services offered must be prominently displayed, so they can easily be seen by all visitors to the premises.

(5.2) such price lists must also be available for clients to take away with them or to be presented and left with them when a home visit is made.

6.2. Provision of Estimate

(6.2.1) Clients must be provided with a detailed written estimate at the time of arranging the funeral or, if that is not achievable then as soon as practicable afterwards. Where a consumer requests an estimate, in writing or otherwise, at an earlier stage (e.g. during an initial meeting or over the telephone), members should

provide this as far as is practicable to do so. Members should make sure that clients confirm their acceptance of the estimate formally, as long as possible before the funeral takes place.

(6.2.2) all estimates must at least give the following details of the Funeral Director's charges: Professional fees; Removal of the deceased; Coffin or Casket (including fittings and interior); Embalming/Hygienic Preparation; Hearse(s); Limousine(s).

Where only an approximate cost can be given, it must be made clear that this may vary. The 'confirmed' cost must be supplied to the client as soon as possible.

(6.2.3) all estimates must also itemise each disbursement cost, including: Cemetery/Crematorium fees. Doctors' fees. Minister of Religion or Officiant. Church and associated fees. Where only an approximate cost can be given, it must be made clear that this may vary. The 'confirmed' cost must be supplied to the client as soon as possible.

(6.2.4) any additional items, which arise or are instructed after the estimate has been issued, must be authorised by the client prior to them being charged to their account.

(6.2.5) a revised estimate, showing the changes made and the alterations to costs must be issued wherever practicable, where the client varies their original instructions, and again the client should formally confirm their acceptance of such changes.

f) How do consumers evaluate non-price factors, such as quality?

While funerals have some characteristics of traditional services (intangibility, perishability and variability), the highly emotional nature of a funeral makes evaluating a funeral service on cost or even a traditional assessment of 'quality' problematic¹⁷. Consumers' judgement of the service may be impacted by factors such as the turnout at the service, the personality of the celebrant, or the content of the eulogy given by a family member.

Equally, the level of support offered by the funeral director, the facility by which the service is assembled, and the care that is taken to honour the memory of the deceased will contribute to consumer satisfaction. However, as consumers are likely to assess the overall experience, it may be challenging for public policy professionals to isolate satisfaction with individual elements, such as funeral directors' services, when assessing quality.

¹⁷ Korai, B. (2017). Rethinking functionality and emotions in the service consumption process: the case of funeral services. *Services and Markets*. Volume 31. Issue 3.

g) What are the benefits or limitations of intermediaries, such as comparison websites, in helping people choose a funeral director?

In theory, price comparison websites could benefit consumers by increasing competitive pricing pressure on firms and providing consumers with greater cost choice. However, such price comparison sites often charge funeral directors a fee or commission for introducing sales which, conversely, can increase prices for all consumers¹⁸.

Whilst a cap on price comparison website fees could limit their adverse impact on costs, such websites value to the funeral market may also be inhibited by the localised nature of funeral markets. For example, while a consumer using a price comparisons website to compare car prices may be willing to travel across the country to purchase a vehicle at the cheapest possible price, such a scenario would not readily translate to the funeral market. In 2017, the cost of a basic funeral was highest in London and the South East, at 45.9% and 14.2% above the national average respectively, and lowest in Northern Ireland and Wales, at 26.9% and 15.1% below the national average, respectively¹⁹. However, for a host of practical reasons, consumers are often bound by geography when organising a funeral; affordable funerals in regions some distance from the friends and family of the deceased are unlikely to be considered. Even within these regional markets, consumers are likely to be further bound by locality; if, by way of example, a consumer is organising a funeral where the deceased's friends and family predominantly live in the North London borough of Enfield, practical implications will likely limit the consumer to offers available in north London, even if the most affordable funeral available is from a funeral director south of the river. Taking such consumer behaviour into mind, the reality for any price comparison website in the funeral market is that, to have a genuine impact on consumers, the site would have to provide a highly localised, bespoke search facility, based not just on UK regional markets, but at the level of boroughs, city districts, towns, and villages.

Furthermore, because a funeral is an emotional service, providing consumers with a cost comparison alone may not be sufficient to facilitate an informed choice. The support and care offered by the funeral director, the facilities available for families to view the body, and the funeral director's ability to meet specific religious or cultural requirements are all significant factors which impact on consumer satisfaction, not necessarily reflected in cost, and no comparison site we have yet seen offers a comprehensive selection of options to consumers.

h) How effective are industry codes of practice in facilitating consumer choice e.g. through transparency obligations placed on funeral directors?

Sections 4-6 of the SAIF Code of Conduct, as appendix to question (e), places requirements on SAIF members to clearly display costs within their premises, to offer all consumers the

¹⁸ Ronayne, D. (2015). Price Comparison Website. Warwick Economic Research Papers. No: 1056.

¹⁹ Critical research. (2017). The Cost of Dying Report 2017. Sun Life.

option of a simple funeral with an inexpensive coffin, and to provide all clients with detailed written estimates. The Code also ensures that vulnerable consumers are protected from exploitation and that high pressure sales tactics are prohibited.

By requiring members to uphold high levels of price transparency, to offer consumers the choice of a simple funeral, to protect vulnerable consumers, and by prohibiting high pressure sales, the SAIF Code of Conduct facilitates greater consumer choice.

The SAIF Code of Conduct is enforced through an ongoing inspection regime, with SAIF members inspected every 24 months to ensure compliance with the Code.

The extract below details the SAIF 'General Conduct' membership requirements [section-1], covering vulnerable consumers.

Extract from the SAIF Code of Conduct

1. General Conduct and Presentation

(1.4) members must establish and interpret client needs without exploiting vulnerability or exerting any pressure on them.

(1.7) members shall not try to persuade clients to choose an expensive or elaborate funeral when a less expensive funeral is more appropriate to their circumstances.

i) How do funeral directors compete to attract customers?

There are a variety of ways in which funeral directors promote their services to attract customers; this may include advertisements in local newspapers and radio stations, community engagement activities at events or via social media, and by listing their services on trade sites such as localfuneral.co.uk, or through their own commercial websites.

Fundamentally, however, independent funeral directors attract customers through the provision of a high quality service by supporting and caring for their clients, and building up trust and loyalty within the community and among families²⁰. Generating 'word of mouth' recommendations is integral to most independent funeral directors business.

j) What, if any, barriers exist to funeral directors entering a new local area

The most significant barrier to funeral directors entering new local markets is the cost of establishing a new funeral home facility in that area.

Alongside the cost of real estate and equipment, the current cap on the 'other expenses' element within the available DWP support for Funeral Expense Assistance (the revised

²⁰ Virginia, R., Beard, W. and Burger, C. (2017). Selling in a Dying Business: An Analysis of Trends during a Period of Major Market Transition in the Funeral Industry. Journal of Death and Dying. Volume 76. Issue 3.

Scottish Social benefit) places a significant strain on funeral directors' ability to extend their services into areas of high deprivation where consumers are likely to be more reliant on state support to cover funeral costs.

Furthermore, third party resource issues, either in terms of graveyard land shortages or local authority staffing limitations, may prohibit funeral directors from entering new markets. A deficit of resources in local government can result in funeral directors having to care for the deceased for longer periods of time, driving up their costs, and creating an additional barrier to market for new entrants.

However, it should be noted that few professional standards inhibit individuals from joining the profession. The ability to trade in an adjacent area without developing a significant physical footprint does encourage new openings and the move towards un-attended cremations is also allowing more distant suppliers to gain consideration in some instances.

Indeed, independent funeral directors, from both urban and rural locations, report that competition within their localities has significantly increased over the past decade. Membership figures from both the NAFD and SAIF support this observation, with the NAFD having recorded a membership uplift of over 30% between 2007 and 2018, while SAIF saw a 48% increase during the same period.

k) Could funeral directors providing enhanced online information enable effective comparisons, and if so, what information should they provide?

As mentioned, SAIF members are required to offer consumers the option of a simple funeral when providing cost information. However, currently, there is no cross-industry agreement on what constitutes a simple funeral, or even a standard funeral. Without such agreement, funeral directors may be apprehensive about providing cost information online, as consumers might attempt to make direct comparisons with incomparable services elsewhere.

An agreed cross-industry definition of a simple and standard funeral could facilitate the provision of cost information which could be effectively compared online and thus give funeral directors the confidence to display price information on websites, knowing that the services they offer vis-a-vis competitors will not be misinterpreted.

In the absence of agreed definitions, while the provision of cost information online can still benefit consumers, direct comparisons between services are not easily made.

l) Are there other ways to improve transparency of information that we should consider?

SAIFCharter believes that in order to facilitate better price transparency and cost

comparisons, advertising practices within the industry could be examined to ensure, for example, that funeral directors provide clarity on pricing and product description.

Of particular concern to the independent sector is the practice of national firms allowing some of their branches to be marketed as apparently stand-alone independent funeral director brands. Plaques advising of ownership may be discretely in place but headlining in advertising, websites and on shop front billboards lead with a subsumed local brand.

This practice is misleading to consumers, who often choose an independent funeral director as they consider an independent to be a more personal choice when making a purchase in which they are emotionally invested than that of a corporate provider.

An additional concern exists over the clarity of product description, particularly around coffins. A coffin can represent a significant cost to consumers; however costs and quality vary greatly, particularly with different coffin suppliers operating in each of the regions. Transparency in product descriptions, for example in highlighting the difference between solid wood, wood-veneer, and wood-effect, would ensure that consumers are not charged similar prices where materials and production costs vary.

There is also a requirement for improved crematoria cost transparency. With costs varying significantly both within and between regions, and above-inflation fee increases recorded in every region each year since 2010, consumers require better access to information.

m) Are there measures that could help consumers evaluate non-price factors, such as quality, together with prices?

Combining the features of a price comparison websites with the features of a consumer-review website could, in theory, provide consumers with qualitative information on quality of service and levels of care, alongside the quantitative data on costs. However, care should be taken before advancing such concepts, as unintended consequences may result. For example, the provision of a consumer-led review website could result in funeral directors requesting reviews from bereaved families at a time when such matters are far from the families' priorities. Indeed, there is clear evidence that research in this area is difficult to achieve because of this sensitivity. It is also unclear at present how likely it is that bereaved consumers in the at-need market would use such price comparison or review websites.

One alternative would be a requirement for funeral directors to provide additional details, on their website for example, on the methods and approach they take to the provision of care not only for the deceased, but for the bereaved.

n) Are there technological or innovative solutions that could help consumers make more informed choices?

Recently developed websites such as localfuneral.co.uk assist consumers in identifying independent funeral directors within their locality, and offer an alternative to the major corporate brands in the funeral market. LocalFuneral.co.uk also provides an online 'Help and Advice' section, with guides to coping with bereavement and arranging a funeral, along with definitions of standard, classic, premium, and tailored funerals. Further utilisation of websites and mobile apps may allow more consumers to liaise with and organise elements of a funeral service remotely in the future, widening out the geographical areas in which it is practical for consumers to connect with funeral directors.

In considering how technological innovation may be able to benefit consumers both presently and in the future, SAIFCharter believes it is particularly important to consider how vulnerable consumers are treated outside of the requirements laid out in the Equality Act 2010. This could, for example, be through the provision of advice and advocacy services, delivered remotely via websites and apps, or through the provision of 'easy read' guidance, suitable for adults with limited literacy, who would not necessarily be protected by the Act.

4. Contact Details

This response was submitted on behalf of SAIFCharter. For questions, clarification, or to discuss further any content within this document please contact either:

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