

Dear CMA

We are pleased to be invited and to contribute to your survey.

As an independent source of funeral related information and operator of the only funeral consumer helpline for over 27 years, our charity (The Natural Death Centre) is well placed to observe the changes and issues that are relevant to the public.

I am afraid it does not make for very comfortable reading.

Further to the OFT's observations at 43; not only are people unaware of prices and unwilling, unable or too exhausted to shop around - believing all undertakers to be 'much of a muchness', they are generally completely unaware of the choices and potential, alternative options available. For example, not having to use a funeral director at all, not needing a hearse, embalming, or a ceremony, most do not know that they are able to keep the deceased at home.

45, You note the challenging circumstances that lead to this 'distress purchase'. A fantastic solution would be a requirement for undertakers to explain and display all options and consumer choices, before they get to the point where they reveal their firm's 'packages' and start the decision/sales process.

Information should also be available from all gatekeepers, not only undertakers, but NHS bereavement services, the coroners and the registrar service. This would require a major education drive as most of these, and other, gatekeepers, including medics and palliative nursing staff have no idea what is possible, legal and available. When asked at point of death "what do we do now?" The "you appoint a funeral director" answer means that most families are lost into the industry's system and get sold the funeral the undertaker wants them to have.

We speak to many gatekeeping groups, the most common myth is that embalming is a legal requirement! How have these and other common beliefs entered the public and professionals' psyche, becoming fake fact?

47

a Prices increase beyond the disbursement rises as funeral directors continue to repeatedly and unnecessarily purchase and updated their vehicle fleets at a cost of hundreds of thousands of pounds each time. They do so to compete with other local firms. The upshot of this rivalry is that the cost of these 'upgrades' has to be shared across all their funerals whether the family want or care about travelling in the latest model, most would not notice.

A notable exception to price increases is Dignity's move to market a direct cremation service, the co-op have also recently introduced a direct service.

b Whether or not firms have shareholders to satisfy greatly affects their ability to be flexible and keep prices down, furthermore the local 'shop-front branches' of larger chains have no power to source items on clients' behalf, they can only offer and sell what is in the company brochure, to the extent where specific requests are apparently 'now completely unavailable' and upsettingly wishes remain unmet.

Charging 'corkage' on coffins, when families have supplied their own, or routinely imposing huge mark-ups on coffins is an outdated and unfair practice that a very few enlightened firms are now stopping; instead they charge a reasonable, itemised handling fee and do not hide awkward costs within the coffin price.

c Family tradition - even if the firm has changed hands. Local proximity and recommendation.

d Sufficient information is only really available to those who surf the net. Once you are through the door of most funeral directors they will steer you towards the, routine, formula funeral they want you to have.

Even when families express financial hardship most funeral directors will not advise them about alternatives, only about their own 'budget' or 'fair' funeral "I'm sorry madam but this is what funeral cost these days". These offerings are still much more expensive than other options like Direct funeral services or DIY. Even the QSA 'fair' funeral is more expensive than alternatives and often does not represent the best deal or most appropriate solution.

e No, it is not in their interests. As above, alternatives not given

f Consumers cannot evaluate quality. Most people do not arrange more than two funerals in their lifetime - they have no idea and are basically very, but understandably, ignorant consumers. An element of Stockholm Syndrome can also feature, they want to believe, trust and like this friendly 'professional' at a time of immense crisis.

g Comparison websites promote their sponsors and are generally click rate funded, most do not list all options. This is not helpful and could be seen as exhausting and distracting to the internet researcher/shopper.

h Industry codes of practice are of no help, they are run by trade associations whose priority is their members, not the public.

i Sometimes in underhand ways. Christmas 'sweetener' hampers to nursing homes etc

j Local opposition to anything deathly!

k All choices not simply their own products

l Train all gatekeepers

m Education about the variability of standards, price and flexibility of undertakers.

n The internet is already helping the generation who feel able to use it to 'shop around'.

49-51

The availability of 'cheaper', unpopular time slots at some local authority crematoria is enabling a few undertakers and DIY families to cremate for less, especially if the cremation is unattended. Again letting the public know that this is an option would be incredibly helpful.

The rise in unattended, direct cremation is the biggest change we have witnessed over the last 5 years and continues to suit so many family situations, not just financial.

We are alarmed though at the rise of industrial scale, body collection and disposal, businesses opening, financed by VC money. This is a dangerous development for many reasons.

o Crematoria serve the public well, viewing them as their customers. However, one company, [X], refuse to help and support families who do not wish to employ a funeral director. They insist that one is involved, forcing families, who wish to use their nearest crematorium, to spend, on average, £2,500 more than they need or want to or forcing them to go further afield. They operate [X]% of crematoria in the UK.

p Funeral directors will not encourage families to go further afield as this impacts on the ergonomic use of their men and vehicles. They wish to get as many funerals into the day. Efficiency = profit.

This mind-set is also what is retarding the growth of Natural Burial as an option. In general, undertakers, especially the large, busy firms do not put natural burial on the table, even though it is often much cheaper, particularly for urban families who wish to bury for cultural reasons. It takes too long to travel to a more distant cemetery so is not suggested as an option. Undertakers like a nice quick, dry, warm turnaround at the crematorium. This behaviour is being reported to us from across the whole of the UK by members of the Association of Natural Burial Grounds.

q Not our area of expertise

r Public/private - 2012 emissions clean up

Our experience, gained through running our unique NDC helpline, can honestly bring us to no other conclusion than that the funeral industry is extremely patchy and frequently gives poor service. What we hear would be interpreted by many as verging on abuse and that advantage of vulnerable individuals is being taken.

There is no supportive complaints procedure available other than the listening ear we can offer. We see no evidence of the trade associations disciplining or expelling offending

members even when their third party arbitrator may find in favour of the family and obtain a refund. Their complaints procedure is cumbersome and soul destroying, most families give up. Is this surprising? The trade associations operate for the benefit of their members.

There should be somewhere independent for complainants to go.

Things are changing, all be it slowly, for the better. The rise in boutique, alternative undertakers, mainly women, who are coming into the industry, often as a result of personally receiving poor or dreadful service, continues to bloom across the UK.

The internet is helping slowly spread information. It also brings people to our website and that of the Good Funeral Guide, the only other source of impartial, fully revealed advice.

We would welcome the opportunity to meet with you to discuss these issues.

We would welcome being part of any additional funeral director training as it seems that myths, omissions and misinformation taught to trainees is just perpetuating their inability to provide the best help and accurate advice.

Manager

www.naturaldeath.org.uk

The Natural Death Centre Charity

Registered Charity no. 1091396

The Natural Death Centre is an educational charity which sees death as a natural part of life. Founded in 1991, it is committed to supporting cultural change and is working towards a situation where all people are empowered in the process of dying, and organising a funeral.