

Funerals market study team Competition and Markets Authority
Victoria House
37 Southampton Row
London
WC1B 4AD

Response from Paul Allcock, Allcock Family Funeral Services to the Competition & Markets Authority - Funerals Market Study, Interim Report.

Introduction

I am satisfied that the CMA call for an investigation into the Funeral Market is justified.

I have no intention of quoting external figures to support my opinions here. As I was not directly involved in producing any of the readily available figures from the likes of Royal London, Sun Life etc, I do not feel that I should make any comment based on those results.

Everything stated here are simply my views based on 35 years experience as a Funeral Director.

Concerns over Excessive Charges

There are undoubtedly concerns that I have personally held for many years now. The reported substantial and inappropriate charges being made by both Funeral Directors and Crematoria appear in some cases to be accurate. I would add to this that in my experience, the biggest increases in charges effecting the public in recent years have been those of cemeteries, in particular Local Authority Cemeteries. For example a burial in my local cemetery has increased from £1607.50 in 2014 to £3870 today. The cost for the same in the year 2000 was under £500. I note that cemeteries are being excluded from your investigation. I feel you should review this and include cemeteries as one of, if not the biggest sectors affecting the cost of a funeral.

I was also witness to a change in ethos in sales, following the sale of a family business for whom I had worked for 16 years. Previously all funeral arrangements had been made in a supportive manner, ensuring that the clients wishes and needs came first when organising a funeral. The new owners however changed the way funerals were arranged, teaching arrangers to sell more expensive products and offering incentives for staff selling a more expensive funeral. This was the catalyst to me leaving and starting my own business.

I propose any investigation should highlight excessive costs and could even propose a recommended limit based on appropriate levels and expenses required to create a service of good quality and care for the deceased and the bereaved. These limits could be different for each sector, Funeral Director, Crematoria and Cemeteries.

Standards and Quality of Service

Additional concerns that I have are set around the quality of care and the support for the bereaved at their time of loss. I have witnessed 2 local shops open as a Funeral Directors in the past 10 years, only to close again within a year of opening. On both these occasions, the proprietors had no previous experience of organising a funeral. Both also sold pre-paid funeral plans which left their clients upon the closure of the

business without any redress or way of getting their money back. Thankfully there were very few funerals conducted by these companies, but those that were heralded complaints and concerns over both the care of the deceased and the bereaved.

So there needs to be some form of Registration to eradicate just anyone being able to open as a Funeral Director with no appropriate skills or experience. In my opinion both the NAFD and SAIF offer all the governance required to manage a policy of Registration. Funeral Directors have to be accountable for their actions and currently there is no real power in the hands of the Associations to police this. All they can do is to remove a Funeral Director from membership, but this doesn't prevent that company from continuing to practice. Neither of the 2 companies in this instance had made any attempt to join either of the Member Associations.

THIS HAS TO BE STOPPED!!

In addition I am concerned over the level of care of the deceased and the bereaved being offered by some of the companies offering direct cremation. Some are simply a man with a van and no premises. Obviously having very limited overheads means that this service can be offered at a very discounted rate, but the question I ask is does the cost then make it an appropriate service when there appears to be limited or even no care of the deceased or the client?

The last 12 months have seen a many businesses promoting very strongly their offering of a direct cremation. Indeed there are many who see this option as a way of keeping the costs of a funeral as low as possible in this time of funeral poverty. Indeed I have read it being championed by media and businesses alike as an appropriate option for those who can't afford the costs of a standard funeral in today's market.

My concern is how many people are fully aware of the limitations that this puts on a family, and subsequently the dangers of agreeing to a direct cremation service without the full knowledge of what this includes. Or more importantly excludes, with there being no service with no attendance, no allowance of time being spent with the deceased, basically having no say in any matters. Quite simply a disposal service!

A further concern is that someone arranging a pre-paid funeral for themselves at the lowest cost available is likely to be only paying for a direct cremation. They may or may not be aware of this, but even if they choose this option because it is all that they want for themselves, have they also thought of how this can effect their family at the time of death. The majority of family members will want to have a funeral service of some kind. I have heard of many funeral directors being asked to arrange a memorial service separately from the cremation, which ultimately results in all the same elements of a more traditional funeral needing to be arranged. Subsequently there are little or even no savings financially for the family concerned.

Surely a more appropriate option for the majority and an option which seems to be often overlooked is the offering of a simple funeral. A simple funeral has been around for many years and the majority of funeral directors will still offer this service. Although there are some variants between businesses on what a simple funeral includes, all will at the very least allow the opportunity to hold a service with the deceased present. The terms of most simple funerals will limit the choice of coffin and possibly the timing of the service, but all the essential elements of a funeral will be adhered to, particularly including the proper care of the deceased and the support of bereaved family members. Many funeral directors offer a simple funeral at a cost not much greater than a direct cremation, because to carry out a direct cremation with appropriate dignity and respect will still have a cost not much lower than that of a simple funeral.

A good funeral director will always include the element of good advice and will help people manage their expenses at a time when this can easily be exploited.

So for those who actually want a direct cremation in agreement with family members, then this service when carried out with care and respect for the deceased is absolutely the way to go. However, people need to be very careful and to ensure full awareness of what a direct cremation includes. The effect that this service can have on bereaved family members who aren't fully aware of what a direct cremation consists of can be significant and yet easily avoided.

Transparency of Ownership

In the year 2000, I opened my own family funeral business, having previously worked for 16 years for another family business which had been in existence for over 100 years. In 1999 this business was sold and has subsequently changed hands on at least 3 occasions. In 2018 the business name on the signage outside has finally changed and is now clearly shown as being a branch of the Co-op. The fact that this took 18 years before any obvious change externally took place is very misleading to the public who believe the original family are still the owners. Even today if I telephone this branch the call is answered with the old family name, creating even greater confusion.

I understand that a company may have paid for the goodwill of a business in any purchase contract, but I feel it is important that the true underlying ownership is more clearly marked both in signage and advertising to ensure that any client is fully furnished with all relevant information to allow them to be able to compare different Funeral Directors when choosing who to use.

There has also been much discussion over the past couple of years regarding pricing transparency. My company have had our prices clearly shown on our website from the day the business opened in 2000. There are still Funeral Directors who have no online presence, and others who simply refuse to show their prices online. Dignity recently announced that they will publish their prices online from April 2019. Why couldn't this be done overnight, or at least by the end of the current month? I am aware that SAIF are intending to make it compulsory for members with websites to have their prices clearly shown online. I believe this should be made compulsory across every business working in the funeral sector, including crematoria and cemeteries.

In Summary

- 1: I feel a full investigation into the costs associated with arranging a funeral should be carried out but that this should include Funeral Directors, Crematoria and Cemeteries.
- 2: There needs to be provision put in place to prevent unscrupulous businesses opening with no training or experience.
- 3: There should be clear markers of what is classed as good practice and what is not.
- 4: Ownership transparency and online prices should be made compulsory.
- 5: There is a definite need for all Funeral related businesses to be accountable for their actions.