

10th December, 2018.

The Funeral Market Study Team,
Competition and Markets Authority,
Victoria House,
37 Southampton Row,
London.
WC1B 4AD

Dear Sirs,

Re: Interim Report and Consultation

With respect, I consider that a small but growing facet of the funeral directing industry has been overlooked by the study.

Over the past few years we have seen the arrival of numerous alleged 'funeral directors' that have opened up throughout the country. They, in the main, have little or no experience, rent a shop, (which the owners are only too glad to rent to offset the chargeable business rates). They have very little in the way of facilities, almost certainly no proper facilities for storage of human remains, such as refrigeration, no permanent staff, or vehicles. Bodies are left at civic mortuaries or hospital mortuaries until the day of the funeral, causing a considerable number of hospitals now to institute charging for any excessive delay in removal. Coffins are purchased via the internet, vehicles hired from any source and bearers and staff assembled from any source, often a cash-in-hand arrangement. These dubious enterprises advertise their services usually at a low-cost leader market price. The proprietors of these establishments have no or very little financial exposure and in many cases go or have gone bankrupt owing thousands of pounds.

The public, when arranging a funeral, has an expectation of standards, very rarely will they enquire as to the conditions or whereabouts their loved one will be kept in the intervening period between arrangement and disposal. In the majority of cases the body will be taken directly to the house or cemetery/crematorium, only then will the family/mourners see the quality of vehicle/s that have been supplied or the standard of coffin provided; but by then, having paid in advance, it is too late.

If licensing of funeral directors is to be considered then the standard of premises, vehicles and all facilities should be subject to inspection and approval by a nationally qualified body. There must be no 'Grandfather Rules' exceptions. To avoid any conflict of interest such inspections must not be subjugated to Local Authority control.

The public has a right to be protected, preferably by legislation, from these charlatans who masquerade as funeral directors, subsequently, consequently bringing all the industry into disrepute.

Yours faithfully,

Terry A. Bastock, Director.
Past president of S.A.I.F.