

funerals@cma.gov.uk

Re: Responses to the interim report, consultation and notice of proposal to make a market investigation reference.

To whom it may concern,

I recommend that the Competition and Markets Authority conduct a full market investigation of the funeral industry.

As a secular minister, I work independently of the funeral director to create and officiate funeral ceremonies together with pastoral care. I am usually engaged directly by the client. I visit the bereaved at home, usually once they have made arrangements with a funeral director. I tend to hear about any experiences that concern clients about the process of arranging a funeral, including stress, anxiety and frustration at what they are navigating and how much things are costing, and their wondering if those costs are 'worth it'. I also hear about any dissatisfaction with their funeral directors.

Whilst there are many honourable and excellent practitioners in the funeral industry who are providing a good and fair service, there is also much to address that is causing confusion and distress to the bereaved, as well as far more money being spent than they had originally budgeted. There are, unfortunately, funeral directors who seek to maximise profits by ingratiating themselves to the inexperienced consumer.

The interim report says, a funeral is "the ultimate distress purchase, made infrequently by inexpert, emotionally vulnerable clients, under time pressure." This is a great summary of the situation and one that, in over five years as a secular minister, I have seen too often exploited by members of the funeral profession.

My letter also addresses: an important non-religious demographic omitted from the survey; the issue of low paid, poor quality officiants and the gain to the funeral directors booking them; lack of transparency around options for a funeral service and point of sale advantage; and the new breed of modern funeral directors.

You ask about:

1. Issues specific to religious groups that are not covered in this report: we have focused our work on the transactional aspects of funerals involving funeral directors and crematoria. We believe that the issues we have identified in relation to those specific aspects would essentially be similar across all faiths (to the extent that the way they organise funerals involves transactions with funeral directors or crematoria. We are keen to find out whether we may have overlooked any issue of relevance and will seek to engage actively with the representatives of the major faiths

Working for those who do not identify with any of the major faiths - an important non-religious demographic omitted from the survey:

The issues that you have identified in relation to the transactional aspects of funerals do differ for many modern secular funerals, as people are beginning to use alternative venues and create more individual, personalised and creative ceremonies.

The way that we organise funerals is already changing in response to this wish to celebrate the individual first and foremost, (see below: **Modern funeral directors - a new breed**). This major new non-religious trend, to honour the individual rather than focus on the container of a faith, has been ignored in the report.

In 2011 the census recorded that a quarter of the population of England and Wales reported having no religion, - 14.1 million people. I work as a secular minister and independent celebrant, awarded the National Celebrant Award for Influencing the wider profession of funeral celebrancy this year. I have been in practice for more than five years working in London, Surrey, Hampshire and Sussex providing highly bespoke ceremonies based solely upon the personality and beliefs of the person who died, whatever they may be, and the needs of those left behind. Sometimes these ceremonies are semi-religious, non-religious, honouring a faith but choosing a non-religious celebrant, and quite often blended faiths where family members have different faiths. I have officiated secular Christian, Hindu, Muslim and Jewish ceremonies, humanist ceremonies, as well as many non-specific spiritual - non-religious - non-humanist ceremonies i.e. a "religion of their own", constructed from their own experience and beliefs. Many people now have belief systems constructed from their life experience and encounters with several world faiths. Of those that still wish to have secular ceremonies which honour a faith, my clients are keen for personalisation over liturgy but often wish to have 'religious' content. I am happy to work together with a religious minister when necessary, and have done so. I am usually engaged directly by the client through recommendation or increasingly by internet search. Therefore, I have worked with many funeral directors.

Funeral ceremonies are no longer similar across all faiths. People are now choosing funerals outside of the conventional, choosing alternative venues and longer time slots, requiring funeral directors and ceremony venues to work more flexibly and collaboratively with the consumer and/or officiant. [1]

I feel that the report has overlooked the relevance of modern bespoke funerals carried out by celebrants who rather than using generic material or templates, create ceremonies that are unique and tailored to the consumer's wants and need. Perhaps your methodology has inadvertently overlooked and excluded modern funeral directors and their consumers?

I feel that you need to engage not only with representatives of the major faiths but with someone who works exclusively with people who decided not to have a ceremony officiated by a representative of the major faiths, in which I would include Humanists UK, which itself has a clearly defined belief system.

I work completely independently of any faith system and serve the client and their beliefs as they express them, with the focus on the unique individual who has died. I am serving the overlooked demographic. You are very welcome to talk to me if I can be of assistance.

Regarding:

Consumers' vulnerability and difficulty in engaging at the point of need.

Expectations:

The bereaved rarely know what to expect. They generally have very low expectations of the funeral, expecting it to be a painful formality. Enough people have been to a ceremony that

was meaningless to them or even something they feel was poor or detrimental, that this is perhaps a fair assumption.

(My own grandmother's ceremony was a generic 'insert name here' ceremony with little meaning, so I speak from personal experience of what I then thought a funeral was.)

The bereaved are usually focussed on trying to 'do the right thing' by the person who has died. They often assume that there is a way things must be done. The majority of funeral directors don't inform people of the true range of choices that might be available to them. More options are available than most funeral directors will share, and most clients come away believing there are things that they must do which are, in fact, incorrect assumptions endorsed by the funeral director. e.g. following the coffin, having hymns, choosing only three pieces of music, having to accept the officiant offered, using the funeral director's florist, being compelled to use a hearse when they would rather have an informal vehicle.

The following addresses your request to hear about:

3. Consumers' inability to assess certain aspects of quality and the value for money of all options offered given funerals are an infrequent purchase and consumers are often inexperienced

and

4. Lack of transparency: to provide comprehensive information on quality and range.

and

5. Point of sale advantage: ability of suppliers to largely control the decision-making process leading to the sale and its outcome.

Who does a funeral service serve?

Presently, convention has it that the funeral director is the gatekeeper who chooses the officiant and often dictates the time of the ceremony by choice of crematorium and amount of time offered for the service. There are multiple issues around this practice that influence the worth of the ceremony itself.

If members of the public had a full understanding of what one could actually do at a funeral, this would be seen as an inconvenience by many funeral directors. (Many funeral directors do not give their consumers a choice of officiant beyond "church or non-religious", sometimes male or female. They then book a celebrant for the consumer.) Tailoring funeral services to the clients' wishes and needs often leads to longer service times, e.g. a double slot at the crematorium or natural burial both of which generally mean funeral director's staff having to be on-site for longer, hearses and limos out for longer - both meaning that less funerals can be accomplished in a day, plus more time must be spent coordinating a process that is not completely standard in every way. Therefore, a funeral director's offers to the consumer may be limited to what the funeral director feels is 'right' and 'appropriate', and also to what it suits them to provide for maximum profit. I recollect a [] arranger telling me that she would love to offer custom decorated cardboard coffins but her employer strongly discouraged it.

Funeral director advice is, therefore, frequently strongly biased towards the optimum functioning of their business and not consumer choice or welfare.

In any other business this may be considered appropriate, however, at the time of planning a funeral the consumer is highly vulnerable and unaware that the nice, supportive funeral director, might be directing them away from options that would best serve them in their grief. Nobody wants to believe that a trusted professional would manipulate them in their grief.

Families are frequently not told by funeral arrangers that a 45 minute slot at the crematorium is in fact 30 minutes of ceremony time including music for entrance and exit, making it really no longer than 25, or that a 30 minute slot is functionally a 20 minute service. Clients are frequently very distressed by this, but it is the officiant who has to break this news. They often want to then book a second slot but that is not always possible. This can be for genuine logistical reasons or some funeral directors just don't wish to do it. Some funeral directors don't offer double slots, not telling the client that it could be an option, or when asked for a double slot will tell the client that the time is not available at the crematorium. A call to the crematorium will show this to be untrue. I have known this on several occasions. (Some crematoria, eg. Mortlake, have their schedules online for all to see, which is very helpful.)

It seems that most consumers are still directed towards the single slot service at the crematorium, if they do not wish to have a religious service at their place of worship. I have been told by several funeral directors that while many religious and non-religious officiants have laughable template services, the funeral director prefers these as they are short and predictable and they get their staff and cars back quickly. This is not serving the bereaved.

The Funeral Celebrancy Council has been founded by the leaders of some of the major training organisations and other organisations within the funeral sector to address low standards in celebrancy. [2]

The ceremony is the most important part of the funeral from the point of view of how the bereaved will continue in life, adjusting to their loss. Everything else around the funeral is concerned with the care and disposal of the body. The ceremony is for the living, it addresses the loss and how people will go forward from that point. However, it is generally of little interest to the funeral director. Many funeral directors do not sit in the ceremonies and, therefore, do not know themselves if the ceremony provided by the officiant was meaningful or appropriate, and in my experience most funeral arrangers have never been to a ceremony conducted by the officiants that they recommend.

(Re: 3.31 - Please note in the funeral industry that the **'funeral arranger'** is an employee of the funeral director who meets the bereaved client and arranges the funeral from the information given to them, which will then be carried out by the funeral director. The funeral arranger is not the client.)

A bespoke ceremony for even a 30 minute crematorium slot takes about 10 hours to prepare, often much more. Findings from a national survey run by the Good Funeral Guide on behalf of the Funeral Celebrancy Council showed, out of 460 respondents: 363 are paid less than £209 per service and only 93 receive more than £209 to create and officiate a service. 51.7% of respondents work for 10 hours or more on a single ceremony. Celebrants are dramatically underpaid for their skills and time, and there is little incentive to provide

high-quality services other than a belief that the work is important. Pay for celebrants is low because the funeral directors are the gatekeepers who decide which officiant to book for their client and how much they should pay.

Only a very small portion of the large amount spent on a funeral is set aside for the minister or celebrant, with more than that amount being spent on any one of cars, flowers or other extras.

The less value that is placed on the ceremony itself, and the less that the officiant costs, the more budget is available and the more value is placed upon flowers, variant hearses, coffin and other extras.

Funeral directors do not earn any facilitation fee from their choice of officiant, although there are a few celebrants (fortunately very few) giving a percentage of their fee back to the funeral director for using them. This is not the way that an appropriate match for a client should be facilitated. However, there are facilitation fees or markups on flowers, coffins, order of service printing and hearses throughout the business.

The funeral director does not financially benefit from hiring an appropriate officiant for the family, therefore, to many it is of little interest who they hire, preferring those with short ceremony times and little customisation for the reasons stated above.

Yet the ceremony itself is the reason that everyone gathers - to be together, support one another, and speak and tell stories about the person who has died, share feelings and beliefs, as they come to accept a death. This need to gather to honour a death is as ancient as our species.

Restriction of ceremony content by the funeral director

Creating a modern personalised ceremony with an inflexible funeral director can be a challenge. Recently I worked with a funeral director who was upset that the coffin would be carried in to the crematorium chapel to a Puff Daddy track as they felt it was not an appropriate tempo for the bearers to step in time to. They could not understand that the family didn't care if the bearers stepped in time (in fact that sombre formality could possibly have pained them further). They only wanted their son to have music that he liked for his funeral - music that meant something to him and to them.

There have been occasions when I have met a client family to organise the ceremony and they have already chosen music that is standard classical music for a funeral. When I have asked about the music choice, I discover it has nothing at all to do with them or their taste, or the person who died. They have just chosen three tracks from a list that the funeral director gave to them, believing that was their only choice and feeling pressured to choose then and there. Music is so important and everyone's taste is different yet, for their own convenience, some funeral directors are restricting music and reading choices to lists of popular choices in their office, unless consumers are quite forceful or become too distressed. In 2019, when the whole iTunes/Amazon music catalogue is available to choose from, this is not appropriate.

Finalising the music choices when the client first visits the funeral director makes things easier for the funeral director, as they can just instantly order the music and the order of service to a formula with little fuss. Waiting to hear back from the officiant regarding the

unusual music choices or order of service is perhaps more bother, however, getting the ceremony right for the bereaved and the person who has died should be a priority.

People, especially in the newly bereaved, should not have to find the energy to be forceful just to get good and fair service from anyone in the funeral industry.

The purpose of a funeral ceremony

This is all relevant because the purpose of a funeral ceremony is not simply a formality. A good ceremony can be part of a greater healing journey through grief and something that supports mourners going forwards for years to come.

Negative experience is too often the norm and the expected experience of a funeral service. When the ceremony is without meaning or completely impersonal it can be worse than having no ceremony at all.

There are no legal requirements of the ceremony itself, nor should there be, though many people believe that they must have a funeral ceremony, and due to experiences of previous ceremonies which have often been negative and even traumatic, they are happy to disengage from the ceremony as much as possible and allow a funeral director to take charge.

A short and impersonal ceremony causes the least inconvenience to the funeral director, therefore, the bereaved are often not getting a quality ceremony as the funeral director is still almost always the gatekeeper to the officiant, both for non-religious or semi-religious ceremonies, or where a religious ceremony is needed but the person who has died did not attend their church, temple, mosque or synagogue regularly.

The ceremony is the moment in time when we all come together to celebrate someone's life and mark their death, and we do that for two main reasons:

1) by remembering the person who has died we bring them present in heart and mind, and can then say goodbye to them in a way that has meaning and helps with the grieving process

2) the funeral is the only time when the whole community is gathered: family, friends, work colleagues, community. We hear the stories and testimonials of the person who has died, about mortality and grieving together; we come together process a loss, and the community's loss in that individual; and together we understand better how to cope, to heal, to support others, to be supported and to move forward in life.

The funeral ceremony is for those left behind. It does not have to meet low expectations. It can be supportive and up-lifting. However, funeral directors seeking to earn more for doing less are leaving vulnerable consumers cheated of a meaningful experience.

Modern funeral directors - a new breed

The highest quality and most professional care I have seen have been from local independent funeral directors including those working on new and less conventional models of funeral directing. There is a rising number of bespoke and modern funeral directors in the UK, which did not register in the report. Interestingly those I know are all run by women who

really listen to the client and go above and beyond to facilitate a funeral process that is supportive and beneficial to the bereaved as possible. [3]

There is no simple formality here from these modern funeral directors. These funerals are unique and designed to fit the needs of the client often taking place over several hours, if that is what the bereaved want, and with exemplary consumer service and attention to detail. For some consumers these bespoke ceremonies are the way forward and acknowledgement of them should be included as part of any report on funeral practice in the UK of 2019

Further points on the vulnerability of consumers and psychological process

Some clients are more vulnerable to pressurised up-selling of flowers, coffins, hearses etc. than others. People want to do right by those they love, and when they feel that someone did not have the best in life they often want to sure they give them the very best in death.

Also people do feel awkward about rejecting certain elements of the funeral norm. Studies in terror management theory show that when people are highly aware of their mortality they tend to make decisions that conform to society's norm, sensing that community will be more supportive if everything is done the normal traditional way. Funeral directors know this, from experience, and lean on these cultural trends and norms.

My personal observation is that people do not generally complain about funeral services. After even the most awful funeral service people will shake the officiants hand and say 'lovely service' and they will thank the funeral director. I believe that it is a huge psychological challenge for anyone to admit that the funeral they commissioned for a person they cared about was not adequate or appropriate, and that either the funeral director that they chose or the celebrant they selected, or accepted, was not good. This is the last thing that the bereaved client has done for the person that they loved and, as such, it is too painful to admit that the service that they got was inadequate. It cannot be undone or redone. To admit that it was a poor service just adds to the sorrow, confusion and distress of bereavement.

Conclusion

Thank you for setting up this investigation and for such a well researched and thorough interim report. I hope that it will lead to making the organising of a funeral less of a 'pot-luck' experience for the bereaved, and to something that does indeed prove supportive at a most challenging time.

Whilst at the moment I do not see obvious solutions to the issues of balancing business practice with the complex emotional dynamics at play, it is something to which I have already given a lot of thought. I am more than happy to discuss any further follow up questions or ideas you may have.

With all best wishes

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Appendices

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