

Competition and Markets Authority
Funerals Market Study

4th January 2018

Dear Sirs

I write on behalf of Freeman Brothers Funeral Directors, in response to your interim report of the funerals market study.

We would like to comment on several points in particular as well as the tone of the findings generally, but firstly I would like to tell you a little about our business. Freeman Brothers started trading in 1855 in premises which we still occupy in Horsham, West Sussex. Like so many funeral businesses, we are descended from the activities of a general builder and carpenter, who carried out funerals as one of his many diverse activities. The current proprietor is a direct descendent, being the great-great-grandson of our founder; and his son, the sixth generation of his family to work in the funeral industry, has recently commenced working within the business. I manage the company day-to-day, having been recruited to my role around twelve years ago. We have two satellite branches in Crawley and Billingshurst in West Sussex and have recently acquired a fourth premises which we are refurbishing to open in February. We carry out in the region of []. We operate our own pre-paid funeral plan held in Trust; []. []; we have collected Deceased people on behalf of the Coroner's service since before there was even a tender process for such an activity. We employ almost 30 local staff and use a variety of local, independent businesses for all of our services including: the solicitor for our Funeral Trust and employment advice matters; a local independent recruitment agency for obtaining of administrative staff; a local payroll bureau; a nearby family-run newspaper shop; to say nothing of independent tradesmen for repairs and building work. We are one of the two longest-established businesses still trading in Horsham- the oldest, the local newspaper (for whom we are a large client) now only has a reception office in the town and runs all its business from a call centre in the north of England.

All of this makes us feel that we are experts in funerals and specifically in what bereaved people in our local area want when someone close to them dies, and how we can provide that funeral for them in a dignified, appropriate way, for a cost which enables us to successfully run our business and reward our staff's exceptionally hard work but does not place an unreasonable burden upon our clients.

The funeral industry has undergone massive changes over the time we have operated but this change has truly accelerated within the last few years. The range of options available in many respects is far wider than it ever has been. A key example would be in the supply of willow coffins. In ten years, we have gone from rarely providing them (in 2007 we did not supply any) to them being last year around 6% of all the coffins we sell. These are a premium product which attract a higher cost, for several reasons, including the fact that they take 48 person hours to make and have to be ordered individually, meaning they attract an individual delivery charge which has to be factored into their cost. It might be assumed that other more expensive types of coffin (for example, solid wood), are being sold less as people are making an alternative choice but this is not our experience- the decrease we have seen in the sale of solid wood coffins- which seems to be largely led by environmental reasons- is at a smaller decline than the increase in take-up of alternatives such as willow, bamboo, wicker, seagrass and even cardboard. All of these are usually more expensive than

a traditional veneered coffin, suitable for cremation. When we discuss the cost of a coffin with our clients (many of whom erroneously assume that an alternative material will be cheaper), the vast majority of people do not change their minds about their choice of coffin, but will sometimes go on to discuss with us other ways that they can factor this into their overall spend. This is presumably an example of what you identify in point four of your summary as 'the average spend on discretionary items has remained broadly unchanged, as people try to keep the overall cost down.'

You characterise people as 'trying to keep the costs down' through spending less on 'non-essential items'; which seems to us to be an entirely reasonable way for sensible people to act. This, however, contradicts the broad message of your report, which claims that bereaved people are 'not able to exercise some of the most basic commercial judgements that customers typically display'.

The first area which we wish to highlight is your general characterisation of people arranging funerals as 'extremely vulnerable'. We believe any statement which does not allow for the broad range of emotions which result from the incredibly various circumstances in which people find themselves having to arrange a funeral to be disingenuous. Assuming that everyone who has to arrange a funeral is distressed is a key error which is made time and time again, not only throughout this interim report but in society as a whole. This is in some senses an easy mistake to make. We love those close to us deeply and therefore we cannot conceive of a time when their death could make us feel anything other than acute pain. If we imagine our funeral being arranged at all, it is probably by our closest family or friends, and we would understandably imagine them to be equally as devastated by our loss as we would be by theirs. However, this is a gross oversimplification. The death of someone close to us is often a time of pain, but in our experience it is rarely that simple. There may be relief- especially if the person has been unwell for a long time. There may be guilt, anger, resentment, happiness. Not everyone is sad that someone close to them has died. As Age UK's leaflet on Coping with Bereavement puts it, 'Grief can make you feel many different things'. The same leaflet identifies several of these possible feelings as including fear, anger, guilt and loneliness. Even people who are upset are not necessarily so to the loss of sense. We receive plenty of feedback from clients who tell us that the ways we have helped them with the funeral- which they often, but not always, characterise as a 'difficult' rather than 'sad' time- have allowed them to regain control and been empowering and beneficial to their process of dealing with the bereavement and any resultant grief. Additionally, we tend to find that the truly distressed people are so upset that they are not able to make any decisions at all, one way or another. Their response to distress is to not know the right thing and their instinct is therefore to not be able to make that choice at that time.

Vulnerability comes in many forms and strikes us at many times. People may be vulnerable when they need to buy a new mobile phone after a mugging, or when arranging a wedding if they are estranged from their family. We see no attempt to limit these markets because some of the customers within them are facing emotional difficulty. Your interim report and Ipsos MORI research indicates that consumers are doing their 'shopping around'- to the extent that they feel the need to do it- in person or using previous experience and/or recommendation. That they are using someone who they feel comfortable with (particularly following a previous good experience) not only suggests an ability to make active choices, but also suggests bereaved people are taking action (perhaps even subconsciously) to ensure they will not be open to be taken advantage of. In our opinion, it is contradictory to suggest that people should be forced to shop around to a greater extent than they are happy with, in the aim of putting them at ease and ensuring they receive good service.

Furthermore, because we know (including from your own research) that cost is not a bereaved person's prime motivator in choice of funeral director- coming below various factors including the Deceased person's own wishes- it seems to us highly inappropriate to suggest these wishes should be contravened purely in the interests of saving what may well be small sums of money as an overall

percentage of the cost. In our experience, firms which offer significant savings are only able to do so either through provision of a limited range of services (such as specialising in cremation without ceremony) or by offering significantly different facilities. It is understandable that a company with, for example, no mortuary facilities is able to charge less than one which has a full suite of specialist cold storage, and if the family understands the conditions in which the Deceased person will be kept as a trade-off for this, then this is perfectly acceptable. However, we have seen that the public largely believes in a unity of standards and therefore we need the CMA to convey how funeral directors are to explain these variations to a public which is not only ill-informed, but also unwilling (in many instances) to examine the care of the Deceased person in any detail. How we ensure the clientele understands that the playing field may not be level, when they do not wish to consider such matters, is an area which concerns us greatly.

We do not believe your interim report acknowledges the significant number of people who will be arranging funerals for distant family and see the process as no more than a necessary duty, or duly considers the many funerals which are arranged by solicitors acting as Executors; church leaders; council officials; distant acquaintances who were once friends; children of cousins; care home staff; and so on. We wonder how many of the 513,000 'at-need' funerals you identify as having taken place in 2017 were actually arranged by someone who knew the person who had died, well? We also wonder how the motives around cost might alter when taking into account the relationship between the person who has died and the funeral arranger. Certainly, we have encountered numerous experiences of funerals being arranged in a professional capacity where it has been the arranger's choice to spend more, rather than less, because it is the Deceased person's money which is only otherwise going to be donated to charity or swallowed up in taxation.

The trouble with any research which is undertaken into the funeral industry is that, while it may identify trends or capture thoughts of some groups of people, it will never take into account the extremely diverse range of experiences around funerals. The combination of circumstances and relationships render every funeral truly unique. Your interim report acknowledges in paragraph 6.5 that there is an absence of evidence and we feel that, in admitting this, you have identified the issue at the root of every 'problem' concerning detailed analysis and understanding of the funeral market- the inability to produce a comprehensive study which is able to accurately assess all the variables which not only affect the cost of the funeral, but also client experience and satisfaction. Average costs do not allow for cultural imperatives which will see some West African and Caribbean communities spending in excess of £10,000 on the coffin alone. The Ipsos MORI research which you commissioned identified an average cost of a funeral of £3,602.00 (incidentally, we do not understand why you have not used this figure and chose a higher one in your report, unless your intention was to be deliberately emotive, which we would consider unacceptable). However, even your higher figure of 'nearly £4,300.00' is well within the range which respondents to your qualitative research expected to pay. Therefore it is inaccurate to say that people do not understand the costs of a funeral and, again, does not paint a picture of an ill-informed client base. It is also worth noting that, in contrast to the 16% spending more than £5,000.41, 25% are spending less than £3,000.00. This is precisely the problem with figures out of context- they do not provide an understanding of the underlying decision-making process and there is no way of knowing, for example, who the 16% at the 'top end' are or why they are making the choices they do. We would suggest, however, that a market in which customers are broadly satisfied and 25% are spending (according to your figures) less than 75% of the average cost is not one where undue pressure is being placed upon cost.

Average figures also take no account of disbursements, over which a limited amount of competition is available. Ironically, the third-party charges, which will always be paid whether by the funeral director (who then attempts to reclaim it from the client with varying levels of success) or via Social

Fund Funeral Payment are increasing at a higher rate than funeral directors' fees. Your report has entirely neglected to examine one particular instance of this, which is the most striking example of unnecessary charging of bereaved people, which we wish to outline for your consideration in any future analysis of the industry.

Your report examines crematoria pricing but does nothing to look at burials and, while we have examined your rationale for this, we feel that in pure competition terms, this ignores one key factor. There is only one type of funeral where one part of the cost cannot be reduced by shopping around, and that is where the Deceased person is to be buried in an existing plot, perhaps with a loved one who has already died. As with any other funeral, the funeral director's costs can be controlled through the choice of company used, but unlike cremations (or burials where there is a new grave purchased at time of death and a resultant element of choice) the place of disposal (to use registration terminology) is fixed, and therefore the fee levied for the interment must be paid at any cost. By ignoring this, you are taking no notice of one of the truly uncompetitive aspects of funerals, and neglecting to address one of the significant- and least justifiable- increases in charging structure; namely, the levying of double, triple, or even quadruple fees for non-residents, even for the re-opening of an existing grave of the newly Deceased's spouse.

It is all-too-easy to imagine someone who is bereaved moving a short distance to the next town along, perhaps to access better facilities, more appropriate care, or simply to be nearer to family. Charging double fees to re-open the grave when that person subsequently dies, just because of such a move, cannot be justified. No extra work is done. There is no additional cost to the council in re-opening the grave of someone who is a non-resident. We can accept the need to prioritise local residents for the provision of burial space, and so cannot argue with the levying of increased fees for non-local people at the time of purchase- and perhaps first interment if this happens simultaneously- to encourage people to look closer to their own local area and ensure neighbouring authorities compete to provide their own suitable facilities. However, to charge double fees for interments several years after purchase, and particularly for the second interment, can only be viewed as an attempt to make profit from people who are entirely without choice.

An example of this can be found in [], where one of our branches operates. [] newly-opened [] Cemetery has a fee structure where most charges are doubled for non-residents. To prepare the grave for burial for a resident is £549.00 and for a non-resident is £1,098.00. Presumably, £549.00 is deemed to be the 'right' cost which covers the council's expenses for carrying out the interment. How, therefore, can the additional £549.00 be justified? We repeat our point that, if a Deceased person's late partner is already buried in such a grave, and the wish is that they be reunited, there is no opportunity to negotiate this cost aspect of the funeral. If the CMA genuinely wishes to examine where bereaved people may be not treated fairly, this is a key example, and we would urge that the scope of any subsequent investigation should be widened to take account of this.

Moving away from specific examples, we wish to comment on the overall tone of your report and particularly the sense we get that there is a lack of understanding to which the extent bereaved people's increasing expectations are a driver of costs for the funeral industry, and the lack of acknowledgement that provision of funeral services is changing and that this must have implications for businesses.

Quality of services is hard to benchmark. A funeral which satisfies one person will be by no means sufficient for another. However, it is impossible to deny the general trend towards increasingly personalised funeral services, and your report minimises the effect that this has on funeral businesses and associated costs. Increased client expectation within the same overall requirement parameters has had a demonstrable effect on how a business can operate. There are numerous

examples of this but an ideal one to choose is the arranging of music- something which we have always provided but which has changed beyond all recognition within the last ten years.

Until relatively recently, the vast majority of services which took place at the crematorium would have used their 'in house' organist to play both the hymns and the voluntary music. Non-hymnal music would normally have been limited to two pieces (one upon entry and one upon exit), and it was very normal for the choice of this music to be abdicated to the organist. Typically, families who wished to choose music, or who had lengthy or complicated choices would be the demographic who would already be choosing to have a service in Church (although these would still often be played by an organist). All that was required of the funeral director would be to telephone the crematorium to advise of the choice of hymn(s) (if any) and instructions for the organist. This would take approximately two minutes of a staff member's time. The conversation would typically involve giving the Deceased person's name and service time and a shorthand, 'industry-language' version of the music requirements, which the crematorium staff member would make a note of and pass to the organist immediately before the service. The organist needed a fairly small repertoire of hymns and classical and light classical music, perhaps with a few pieces of well-known popular music if they were able to be played. Even the most complicated arrangements for music would be by way of a provision of a CD, which would be conveyed to the crematorium at the time of the funeral, with simple written instructions provided, taking a few minutes of a funeral director's time. Provision of a CD would also be required if the chosen piece of music was not 'organ playable'. If the family could not find a CD in time (and no-one working at the funeral directors had the piece in their own collection and could lend it), they chose something else. The limited quantity of tracks played was not due to lack of time available (neither of our local crematoria has changed its service duration over this period of time) but purely through lack of custom and deemed necessity in making these choices. The funerals which people attended had generic music and so they were happy with the same when making arrangements themselves. It was not uncommon for bereaved people who sought an element of choice to ask the funeral director to suggest appropriate pieces (or to ask how hymns went) and most funeral directors who have worked in the industry since these times will be able to suggest several pieces of well-known classical music which they would consider appropriate for a congregation to enter or exit to, and could usually be specific enough to tailor their choice to desired tone or mood.

Now, virtually every funeral with a service at the crematorium has a fully bespoke music requirement. The increase in availability of digital music systems such as Wesley Media or Obitus gives a family almost infinite choice of music available. It is not unusual for there to be four or five pieces of music, plus any hymns. Specific versions of music (for example, a classical piece with a particular conductor and orchestra, or a popular piece taken from a particular album of the artist) require research to identify. If hymns are sung to pre-recorded music, which includes a choir, the combination of verses must be checked to ensure the congregation are prepared for the correct words. Many families wish to have their own private pieces (a recording of the Deceased person, or a family member playing a piece) included, which need to be electronically transmitted so they can therefore be added to the playlist for the service. Because music is now so much more important, verbal instructions are no longer sufficient. Each crematorium requires a form to be completed containing full details of the music. More work will also need to be done in their part of the process by creating a bespoke playlist to be played before each funeral. Any unusual pieces of music have to be researched by the service provider, which involves often lengthy telephone calls or email exchanges, and frequently there is a need to clarify pieces with families when their instructions are not specific enough. It is not an exaggeration to suggest that this process, which once was as little as a 30-second telephone call, may take as much as 30 minutes to carry out. [], for our business.

This is only one of many changes which have taken place over the past few years. It is impossible to gauge whether the families having these more personalised funerals are 'happier' with this aspect of the funeral today than they would have been, had they had the funeral ten years ago without it, because the potential to make these choices did not exist in the same way.

Expectations have shifted and there is a resultant impact on our business. The potential to be perceived to be disrespectful to a deceased person or bereaved family is ever-present, and so with heightened expectations come greater necessities to, for example, purchase smarter vehicles more frequently, or dress staff in better-fitting clothes, at greater cost. Each of the willow coffins which I mentioned earlier is individually ordered (a 10-minute phone call) and checked and measured separately by two staff upon delivery (another 10-20 minutes). I am sure the CMA would take a dim view of funeral directors charging by time, as solicitors do, but our costs must somehow reflect that the vast majority of the funerals which we undertake are more complex than they were ten years ago, and take longer to fulfil. It is not reasonable to expect a company to charge less, or even the same, to carry out more work- just because the company happens to be arranging funerals does not change that.

Another important factor is the wait between the death and the funeral, which is steadily increasing by almost a day per year according to our records, and means that logistics for caring for Deceased people in a hygienic, appropriate and dignified fashion have also changed. Again, this is largely due to changes in client preference- the tendency to want the funeral as soon as possible has disappeared almost entirely from our client base. Reasons to delay the funeral which once would have been considered superfluous- inability to secure the chosen reception venue, distant family possibly being unable to attend, perceived unsuitability of certain times of day- are now commonplace. [], but require a far larger team of staff because of the increasing complexity of each funeral. In 2007, we employed 17 staff, where now we employ 29. Each of these staff means a cost, and costs to employ people are increasing over time, as with other industries. The driving up of wages through increases in National Minimum and now Living Wage requirements, workplace pensions, increased maternity and paternity pay and allowances, shared parental leave, and so on, are all to be welcomed, but have their impacts. We have always considered ourselves a good employer and we would not, in any case, feel that even our lower-skilled jobs would be rated at Minimum Wage. However, these are underlying costs which affect a business' bottom line. In specific funeral terms, we know that bereaved people rightly expect the Deceased person to be treated with care and expertise. With the increase in funeral wait has come the necessity to have a second embalmer, who obviously must be fully trained and properly qualified to carry out this important task. The cost of this training was over £7,500.00, plus expenses, plus time allowed for study.

These are a few examples of the considerations which we feel are largely unacknowledged, minimised, or dismissed by your interim report.

Additionally, we note with some concern the suggestion within your interim report that there should be some consideration to the price capping of funerals. This is problematic in several respects.

Firstly, we would like to ask what work has been done to understand the cultural requirements of some bereaved people to have large, grand funerals, which are both factually and demonstrably expensive? An example of this locally to us would be the travelling community, who have many traditional practices around money and funerals, for example the necessity to pay us in cash, with a contribution from each member of the family. Any suggestion to this type of consumer that they may wish to have anything less than the best of everything (as they perceive it) will only be received as an insult. There are also several other communities for whom a more, rather than less, expensive

funeral is a part of honouring the Deceased person, and while we may not agree with this, we do not believe it is within the rights of anyone to prevent people from expressing their grief in ways which are culturally appropriate. Capping the core elements of a funeral will not prevent people spending money, but what it will do is mean that bereaved people will be using less reputable firms who do not follow such caps, or be forced to contract for services themselves (such as hiring limousines directly from carriage masters). Prices will not decrease while people require what they require (indeed they may even increase if there is a reduced ability to take advantage of packaged products where they would be appropriate), but service provision will become more disparate. Competition may decrease if funeral firms cannot trade at appropriate prices for them to cover their costs as they encounter them, and may close down. More complicated funerals- ironically those which most need an experienced person, such as a funeral director, to co-ordinate them on the family's behalf- will be less likely to go well.

Additionally, funeral directors at least have the advantage of dealing with bereaved people every day and therefore being experienced in talking to them sensitively about implications of their requirements; budgets; ways to reduce costs without affecting the overall service; low-cost coalitions to create a meaningful funeral; and so on. It is interesting to note that one of the reasons for the delay in the proposed introduction of a Medical Examiner system was that it was deemed that Registration staff were not able to discuss the cost of certification with the informant at the time of registering the death. Quite apart from the fact that this begs the question as to what specifically qualifies Funeral Directors to be having these conversations, this opens up a whole additional aspect of the wide variety of people who are providing costs for various services to a bereaved person at the time someone close to them has died.

What mechanisms will be put in place to ensure reception venues are not taking advantage of bereaved people by charging more for a buffet for a wake than they would a birthday party? How do we ensure florists do not mark-up more on wreaths than they do on wedding bouquets? Where will a cap be placed for solicitors' charges for Executorship and administering Probate? How will it be ensured that Estate Agents don't slip an extra 1% commission on sales for people who need to sell to pay estate fees? All of these charges could be factored in to the 'cost of dying' and yet it is the funeral industry alone which is deemed to need extra scrutiny. The fact is that funeral businesses which offer a poor value service will not succeed. Your own research shows that bereaved people turn to funeral businesses which they know offer a good service. Other types of business which are not solely dependent on custom connected to death- such as florists, solicitors, restaurants and estate agents- are equally able to overcharge at such a time and are less, rather than more, likely to be detrimentally affected if they do not deal with bereaved people in fair, transparent ways. To put it bluntly, the inherent reputational risk which a funeral director attracts if they are considered poor value is not shared by businesses who are only dealing with deaths as part of their overall portfolio of services. For example, the Money Advice Service characterises probate specialists as 'reluctant' to provide 'a 'binding' estimate of their fees', and suggests 'you might want to prepare for a higher bill' than you are quoted. We would suggest the CMA would find this unacceptable practice for funeral directors and therefore ask why other parts of the overall costs of someone dying are not facing any similar investigation. It is worth noting that there may be no ability to choose who administers the estate (if the solicitor was the nominated Executor) and, therefore, like cemetery costs, there is no possibility of saving money here through comparison or alternative decision-making.

If the CMA truly wishes to ensure that the public is being well catered-for at a time of bereavement, there are several areas, which we would characterise as more holistic in nature, which should be examined.

Firstly, as identified in the interim report, there is a lack of understanding among some sections of the public both about the choices which are open to them when someone dies, and the importance of end-of-life planning. It is now widely acknowledged that one of the key requirements for most people when they are arranging a funeral is that they wish to carry out the wishes of the person who has died. Therefore, there is a probable correlation between being ill-informed on the wishes of the person who has died and a potential to spend more on a funeral than may be required. Simply, choosing items superfluous to that particular funeral on the basis of 'having more things equals a greater chance of getting some of them right' will inevitably lead to increased costs. We would therefore like to see future publicity into funeral pricing include strong comments on the benefits of discussing funeral wishes. We would also like to see the CMA attempt to influence government policy in this respect. Communication around death and dying is not given the broad, macro focus as it should be. For example, the Department of Education's recent consultation into desirable content within PHSE claimed it was looking at all aspects of the lives of children and young people; in spite of this, there was no mention within the document of death, dying or bereavement. If the CMA truly wishes the public to be better informed about funeral choices and costs, it must encourage government to take a multidisciplinary approach to promoting this, because there are still sectors of society for whom the discussion of these issues is wholly taboo. Many public, private, and third sector agencies, such as those who partner under the Dying Matters coalition, have been taking steps in this vein for many years, but evidence seems to suggest that these messages are only reaching the receptive majority, while the reluctant minority remains intractable.

Your interim report characterises those with low incomes as being of particular concern in terms of accessing funeral services. In a sense, the cost of a funeral, as with many other things, is irrespective for those who have nothing, as any amount is impossible to access. This sector of society is not helped by the inadequacy of the Social Fund Funeral Payment, which is paying out less in total each year (in spite of the supposed increase in funeral costs) and which has not kept pace with inflation. Fairer criteria and meaningful grant amounts would offer support to society's poorest.

Equally, Public Health funerals are problematic in the variation of delivery and the CMA should examine the provision of services by Local Authorities. It is not acceptable to prevent families from attending funerals or deprive them of cremated remains in an attempt to deter them from using this service, which is a statutory obligation upon the authority. We wonder how many people are getting into debt to private funeral companies because the service which they would access from their Local Authority is deliberately structured to be unattractive. This not only drives up costs as funeral companies manage their bad debt, but further stigmatises Public Health funerals- already viewed as a shameful last resort rather than an essential safety net. We would like to see the CMA recommend the ceasing of the archaic and emotive term 'Pauper's funeral'. We would also like to see strong disapproval of tactics such as that recently used by [] in seeking to find funeral firms who do not take deposits, who they will then actively recommend to bereaved people in need of financial support. Abdicating responsibility to carry out Local Authority funerals is unacceptable and, again, for those with no money, the lack of necessity to- for example- pay a deposit does nothing to alleviate the costs, reduce the amount of the funeral and make that price easier to pay. Clients may well feel an increased responsibility towards a private company, and perhaps even access insecure credit to ensure they do not owe money to the business which served them well at their time of need. Companies may artificially reduce costs for those families who cannot pay them, but their costs per funeral will still need to be paid and the people who can pay may well find their costs increased as a result of this well-meaning altruism.

The report criticises businesses which do not lower their costs in the face of increased competition in their local area but does not consider that this may be because they are already operating with low margins and are unable to do so. Outside of the largest companies whose pricing strategies were

obtained by the CMA, but obviously not published, it is not possible to say how profitable any funeral business specifically, or the industry generally, is- particularly because the larger companies have such a small overall market share. The larger companies are working to different demands to smaller, independent businesses, and so their strategies are not comparable to firms like ours, whose price increases are largely driven by the necessity to keep up with increases in our outgoings such as fuel; utilities; increase in raw materials cost; and so on- together with the costs, as already outlined, of needing more staff and time to carry out each funeral due to the enhancement of expectations. However, like any business, we must make a profit to be successful and continue trading as we have for the last 169 years, providing our local community with excellence at the times when they need us. The inherent unpredictability of the funeral industry makes forecasting difficult. It seems laughably obvious to state that you can only carry out a funeral for any person once and no-one knows how many people are going to die, but this will have a tangible effect on a business when there is no way to predict future custom. A 'busy year' this year signifies nothing but the potential for a quieter one at some other time. A funeral business will have fixed costs entirely unrelated to the quantity of funerals being carried out (rent or rates; salaries of any permanent, full-time staff; provision of telephone and internet; IT and other equipment). In such an uncertain market, it is prudent to set some income by for the future rather than having an unrealistic 'jam tomorrow' mentality- after all, no-one will benefit if the business' charges are so low that they can't meet their future outgoings and therefore have to close. We do not understand how it is possible in any sector, but particularly in one with such an inherent level of instability, to determine a 'reasonable' level of profit not only for today but for the ongoing survival of the company.

At Freeman Brothers, we have nothing to fear from any level of scrutiny by the CMA. We offer the highest standards for a fair price and this is demonstrated by our low levels of bad debt and high levels of client satisfaction. However, we do feel that the characterisation of businesses such as ours as exploitative is deeply unfair, and, perhaps more importantly, not borne out by the independent Ipsos MORI research presented. We feel the CMA does not have due respect for the public's lack of necessity to 'shop around' and we feel that suggesting cost should be of a higher priority than the assurance of an excellent service shows a genuine misunderstanding of the priorities of bereaved people, for whom the guarantee of a dignified and appropriate goodbye for the person who has died is often impossible to express in financial terms. We feel some of the issues we have outlined above merit further consideration and that their omission shows that the interim report has not assessed the full picture. Ultimately, we feel that trying to ascribe averages and trends to death and bereavement, when every incidence is unique, is far more difficult than the CMA can possibly anticipate.

Funeral service is a difficult job. It is physically demanding, and emotionally draining. It requires a specific skill set and is not a job which anyone can undertake. For our staff it is a vocation and we are proud of the place our business has in our local community. Clients' expectations increase and we do our best to not only meet, but exceed them, but this comes at a cost. We do not think it is unfair to expect to be remunerated- perhaps even to be remunerated well- for providing a unique, bespoke and valued service in the face of those high expectations, especially when we are constantly told by those same clients not only that we do well, and provide excellence, but that they would never wish to do what we are doing- the work which we carry out every day diligently, with pride, and with enjoyment. Without skilled funeral directors, bereaved people will suffer and the dignity of Deceased people will be compromised. It goes without saying that perception of an industry as undesirable to work in means those who are willing to do so attract a premium for their labour and efforts.

A funeral is a one-off opportunity whose personalisation is becoming increasingly important, and with it comes increased pressure to get things right. It is hard to attribute a cost to ensuring that

literally everything goes as expected on one of the most important days a family will ever experience. We urge to CMA to consider the time, expertise, and- perhaps intangible- value of such a service, and assess this, together with the specific issues we have outlined above in any further examination of our industry. Above all, please ensure you truly understand the wishes of bereaved people and their need to take control and make the choices which are right for them at a time when the help of an expert they trust is more important than ever.

If there are any queries about the above, I trust you will contact me.

Yours faithfully

Abi Pattenden
Manager
Freeman Brothers