

Dear Sir or Madam

I write in reference to the above.

Kingfisher Funerals was established in 2010 and we consider ourselves progressive in the sector. From day one we published our full price list on our website, and we were met instantly with negative comments, emails and telephone calls from other local funeral directing companies criticising us for bringing the profession into disrepute because of this.

We developed our online "Funeral Estimate Generator" which allows clients to select the elements of our service and the third party costs which they require, after which they are given the total cost of the funeral. Prospective clients can add and take away elements and the price is updated instantly. This facility is completely anonymous, and available to anyone on the internet, enabling the public to make an informed decision about pricing before they contact us. We are told by an ever increasing percentage of our clients that this is the reason they have chosen us rather than our competitors. We are not the cheapest funeral directors in our area, but we are without doubt the most open. Because we empower prospective clients before they make contact with us, and they know they are not going to be subject to attempts to upsell, clients have overcome one of the principle hurdles identified in the CMA report before they even make the initial telephone call to us.

We believe that some form of regulation within the sector is important, however we have very strong feelings that this needs to be very seriously considered to avoid a recurrence of the situation in the USA. Funeral prices in the USA have soared, partly due to the extensive requirements caused by regulation there.

We are also of the opinion that the trade associations must not become the regulatory bodies. The UK funeral trade associations are made up of funeral directors. The trade associations have proved that they are incapable of strict enforcement of rules, of being highly influenced by the corporate funeral directing companies, of looking after their members above looking after the public, and of shying away from making bold, industry-leading decisions:

- The requirement to provide a basic funeral was removed from a code of practice a few years ago. This is widely believed to be because the corporate funeral directors who didn't want to have to provide a basic funeral put pressure on the trade association.
- A recent trade association response on the BBC website reads "For the close viewing of the deceased to take place, it is essential for the deceased to be embalmed so the person viewing is safe (free from the hazard of infection), and that the deceased's remains are fixed and stable and do not chemically break down or decompose and/or release embarrassing odours from decomposition". This is absolute rubbish. We embalm less than 0.1% of people brought into our care, and have no issues at all in regard to the highlighted "necessities". The trade association is clearly looking after its members rather than considering what the public actually need or want.
- The trade associations "suggest" that members "try" to put prices on their websites and become more open. They should make this a requirement of membership.
- A look at the proportion of funeral directors on the executive committees of the trade associations who do not advertise their prices online probably answers why the above is not the case.
- A high proportion of funeral directors who are not members of trade associations have their prices online. A high proportion of funeral directors who are members of trade associations do not have their prices online. That speaks for itself.

Allowing the trade associations to become the regulatory bodies would be like suggesting turkeys vote for Christmas.

Whatever form any regulation takes, it must be in the best interest of the public. This means that it must benefit the consumer, not just in price, but in quality and in choice. Any regulation must be consumer-led, not industry-led. The corporate funeral directing companies are far too powerful, and far too clever at bamboozling the public with press releases and advertising that don't tell the whole truth. A sign outside a local branch of a corporate funeral director states "Funerals from £1995" and yet that figure doesn't include third-party costs, so you can't get a funeral for that price from them!

Funerals need to be consumer-led, not funeral director-led. One size no longer fits all. Arranging a funeral should not be a "tick-box" transaction, and yet in so many cases a client walks into a funeral director's office, sits down, is told what will happen, given a bill, and walks out.

Funeral consumers need to be empowered to take control, to remember that they are employing the funeral director, and therefore have the right to tell him or her what they want, and how they want it to happen. Whilst many bereaved people need guidance, this needs to be in their interest, not the interest of the funeral director.

Funeral directors and their trade associations need to accept, encourage and welcome new entrants into the profession. They need to not feel threatened. That can only happen when they understand the need for change. Funerals have been the same for too long. All businesses need to progress and move with the times, and public demand is proving this in the funeral profession more than ever at the moment. Funeral directors who insist on defining and limiting what a funeral is are beginning to struggle, and will continue to do so if they don't change. Funeral directors have somehow positioned themselves as superior in society, meaning that they believe they do not need to conform with public demand for change, progression, quality and information.

I would like to question if your analysis has uniformly taken the cost of disbursements (which are set by other parties and outside the control of funeral directors) into consideration throughout. Your report states:

The average cost of the essential elements of a funeral now stands at nearly £4,300, with another £2,000 being spent on discretionary items, such as flowers and catering.

£4,300 seems very high (it is significantly higher than the cost of most funerals we arrange), but without being able to see the figures in the calculations and analysis it is hard to tell what is being used to come to your conclusions. There is a danger it will be confused with the figures later in the report which refer to funeral directors' fees without disbursements. As previously mentioned, all of our costs and our local third-party disbursements are clearly published on our website, and you are welcome to use it to inform your findings.

I am very happy to be contacted should you wish to discuss any of the above in greater detail.

Yours faithfully

Andrew Hickson Dip.FD ARCO
Director

Kingfisher Independent Funeral Services Ltd.