

21<sup>st</sup> December 2018

Funerals market study team,  
Competition and Markets Authority,  
Victoria House,  
37 Southampton Row,  
London WC18 4AD

I am responding to your consultation on the funerals market on behalf of **Dundee Pensioners' Forum** who are one of the constituent members of **Dundee Funeral Poverty Action Group**.

Might I say at the outset – and will give details below – that by and large your interim report mirrors our experiences over the past decade or so.

Dundee Pensioners' Forum (DPF) were consistently receiving stories about how the cost of funerals were pushing low income families into debt, all too often with lenders who were charging incredible interest rates, like for example the so-called pay day lenders. As you point out in your summary (6) *“The cost of a funeral will amount to nearly 40% of the annual expenditure of someone on the lowest income”*.

Although our concern has been focussed on pensioner poverty, we have also been acutely aware of the dreadful struggle facing families when there has been an unexpected death, for example a young drug addict or a mid-life heart attack victim.

In response to the stories we were hearing, about 5 years ago we began a series of outreach meetings to sheltered housing complexes, churches, bowling clubs and so on where pensioners gathered. We took with us a lawyer to talk about wills and power of attorney and an undertaker to talk about pre-paid funerals. Although the advice given at these meetings was usually well received, we were conscious that we were doing nothing about the plight of those for whom a pre-paid funeral was an impossibility and who had little or no savings or life insurances. These were often people in their 70s who had worked all their lives in low paid jobs, who had no opportunity to make savings and for whom their own deaths were an approaching financial nightmare for them and their families.

So we got together the group that has become the Dundee Funeral Poverty Action Group (DFPAC) to see if there was a way to somehow mitigate these circumstances. The group

comprised DPF, the major churches, the City Council, Dundee University and one or two other individuals of influence in the city.

We found ourselves in tune with the Scottish Government's aspirations about tackling funeral poverty and were awarded money from the Scottish Government's Social Innovation Fund to do some in-depth research. There have been three major outcomes from this work:

1. With Scottish Government funding, the creation of a Social Enterprise (**Dundee Funeral Support Service**) to assist people through what your report quotes an undertaker as saying (Summary para 13) *"The ultimate distress purchase...made infrequently by inexpert, emotionally vulnerable clients under time pressure. Clients don't know what to expect, spend little time thinking about the provider and feel under pressure to sort things quickly).*
2. The city's Credit Union is looking at the creation of a product to help in particular with the vexed problem of the demand for large up-front deposits.
3. Dundee City Council are launching in January a 'Respectful Funeral Package' modelled on the package that is run by the East Ayrshire Council.

Out of our experiences we would support the proposal on page 131 of your report, para 9.4 for the CMA to make a MIR. We would point out that the Scottish Government has already appointed Inspectors of Funeral Directors and of Crematoria with considerable powers

With regard to your para 8.31 – services by funeral directors – we think your report is accurate in all aspects a to f.

It is our experience that in almost every case reported to us, the care, attention and sensitivity of front line funeral staff has been impeccable, the nightmare is in the bill. As an example, I myself conducted the funeral of the husband of a lady who was totally confined to a wheelchair. It was a burial and the weather forecast was inclement (heavy rain). The undertaker attended to necessary extra needs, like making sure there would be covering on the ground from the cars to the graveside to make the wheelchair accessible without the risk of getting bogged down in wet ground. He made things as smooth as they could be (and in the event the sun shone) but at the end of it all, his bill was for nearly £6,000.

With regard to para. 8.33 – we think it is totally correct and would say that in Dundee c and d are acute.

We would add our agreement that in para 8 of the Summary, we too are not persuaded by the arguments we have heard to justify higher prices. We have had a meeting just last week with

undertakers that could be described as feisty where their defences of prices could most kindly be described as 'improbable'.

Para 9.5 Appendix F

We wonder why pre-paid funerals and crematorium services are to be excluded. Otherwise we are happy and will to help in any way we can.

With best wishes,

Rev. Erik Cramb,

Executive Committee Member,

Dundee Pensioners' Forum.