

I'm writing on behalf of Royal London in response to the CMA consultation on the proposal to make a Market Investigation Reference in relation to the supply of services by funeral directors at the point of need and the supply of crematoria services in the UK.

We found the CMA Funeral Markets Study to be comprehensive and were pleased to see the key market factors most likely to result in consumer detriment identified within. On the basis of the findings of this study and the draft terms of reference, we welcome the proposal to move forward with a full market investigation.

The CMA study has reinforced our view that overcoming the lack of demand for competition by consumers in this market is going to be a significant challenge. Consumer behaviour when purchasing a funeral is singular in its lack of consideration of factors such as price, quality or comparison of providers to any great extent. As highlighted in the CMA study, this is due to the vulnerable and distressed condition the purchaser is in when making the decisions.

While there has been an increase in the availability of online comparison sites and provision of cost information online, consumers are not shopping around and therefore not accessing this information. It is also worth noting that comparison sites are commercially driven and, as a result, may not always offer comprehensive information or be set up to deliver best outcomes for consumers.

We believe the introduction of the following solutions would make a substantial impact on the experience and outcomes for consumers purchasing funerals:

- Increase awareness of the cost of funerals, options and fact that price and quality can vary significantly by provider – this is critical to try and increase the numbers of people able to make informed decisions.
- An effective framework for assessing quality and standards of funeral directors to give consumers the ability to make a confident decision on who they wish to conduct the funeral they are planning.
- Consistency and clarity of information provided by all funeral providers to enable consumers to select a funeral director and service based on factors which matter to them, including cost, quality and standards.
- Timely access to/provision of information about services/providers in local areas through a variety of mediums. The timescale for making a decision on a funeral director is likely to be very short so ideally some independent intervention would be made at a hospital or care home, where the majority of deaths occur.

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We would be happy to meet to discuss any of the points in this e-mail further, if that would be helpful

Kind regards,

Louise Eaton-Terry

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