
Competition and Markets Authority
Victoria House
Southampton Row
London
WC1B 4AD

17th January 2019

BY EMAIL ONLY

Dear Sirs

Funerals market study.

I write in response to the CMA consultation on whether to make a market investigation in relation to the above; I apologise for this response being after the advertised date of 4th January and am grateful [] for allowing an extension of time to me.

The above Company is a member of the National Association of Funeral Directors. I am aware of the submission the NAFD has made and broadly agree with everything stated therein and therefore will not repeat all such points. In keeping with the NAFD's position I believe the funeral arranging industry has lessons to learn and can improve, not least in transparency over charges, however your reporting thus far is extremely harsh and brushes over that funeral directors and crematoria generally have an extremely good relationship with the public they serve with little evidence of public disquiet in the service provided across the country. It would seem from the CMA's own research that the two largest operators in the UK industry, viz Dignity and Co-Op, have behaved badly and that the whole industry is being threatened with controls as a consequence.

The specific point I wish to make, beyond those made by NAFD, is one of public choice. In most walks of life, a customer/purchaser/client can select from a wide range of suppliers that are ostensibly offering the same thing, i.e. I can choose to have my dinner in the Dorchester on Park Lane or the local pub on the high street; I can purchase my clothes from a personal tailor in Saville Row or the quality-seconds shop in my village; I can travel abroad and fly first class or take the bargain-bucket seat on Ryan Air. Whatever one may think of a person that chooses to be profligate in their spending, it has always been the case and in all parts of the democratic and/or free-world, that they may do so and a significant part of industry is built around this. Why would the funeral industry be any different? The above Company has many funeral homes trading in towns and villages with very different demographics and we have to be skilled at serving people from a complete range of society, taking into account their ability and desire to spend. As with any of the scenarios I have given above, I have funeral homes where one of the strongest skills of the funeral director is in finding ways to make a funeral affordable and conversely, I have funeral homes where our funeral director has to be skilled in providing a hands-on 'luxury' level of service. There is no doubt I would be able to demonstrate invoices issued by my Company for ostensibly the same funeral but where our professional fee is very different indeed; perhaps many-fold in extreme circumstances. To be clear on this, as in no way are we taking advantage of those with 'deeper pockets' (and indeed it isn't necessarily a question of ability to spend; it is as much a desire to spend), there is a small but significant part of society that expects a much higher level of care than is essential for satisfactory funeral arrangements; such a person will, for instance,

expect to see the most senior and experienced (principal) funeral director and find that this person has a higher level of education and general gravitas than is necessary; the funeral director's personal involvement in minutia is important and s/he will be expected to attend to any number of ancillary matters (catering, printing of invitations and thank you cards, researching music and readings that are off the usual beaten-track, etc). Not only is the level of contact much higher, the expectation of response is greater and consequently at one of our funeral homes we have two Receptionists where one would suffice (these Receptionists are expected to respond immediately to a client calling and importantly to familiarise themselves with the names of the clients in advance of their call and to provide suitable refreshments while with us). From the Company's position, in these circumstances, not only is it necessary to employ people in all positions that are at a higher level of competence and ability than they would otherwise necessarily be, it must also accept that productivity from the funeral director and his/her team is necessarily low compared to the average. One example of the range of costs to my Company is that we employ many funeral directors who again, ostensibly do the same job, but their salaries range from C£20,000 per annum to over £50,000 (I have not allowed Directors' remuneration to pervert this spectrum.) I do not wish to bemoan this business model or appear critical in any way as we enjoy working in such an environment, as we do with all our clients, from any and all parts of society. However, if as an industry, funeral directors are to continue providing a full range and level of services then we must be able to charge accordingly for what we do. To be clear, if you take away our ability to charge according to the service we provide, the principle would be no different were you to ban first class air travel and close the best restaurants in town.

Much has been made in the CMA's reporting that arranging a funeral is a distressed purchase and there can be no doubt this is often the case. However, it is a leap of faith to assume that people faced with a bereavement are so shocked and bereft by the death that they become incapacitated when it comes to research and decision making; this is most certainly not the case. The majority of deaths by far are anticipated, at least in mid-term thought if not short-term, allowing most people plenty of time to make reasonable research, which these days can easily be done in the privacy of one's own home via funeral directors' web sites. A very large and certainly growing number of funeral directors have details about funeral costs on their web sites, so much so I would suggest those that do not, actually put themselves at a disadvantage commercially as they will appear unhelpful and/or as if having something to hide, on what in modern terms is probably the most important of our marketing tools. Contrary to your research I can show from analytics of visitor behaviour that the pages on my Company's web site that provide information about cost are among the very most popular pages.

If one believes in a free society in which the majority of people are capable of making their own research followed by choice, then surely the way forward is to require (by law) the funeral industry to provide clear pricing information on their web sites (among other places) importantly quoting against one or more industry standards (packages) the contents of which are specified by a regulatory authority.

Yours faithfully

Steven Tapper, MSc
Director