



The Good Funeral Guide CIC  
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On behalf of the Good Funeral Guide CIC, and further to our initial contribution to the Funerals Market Study in 2018, I am pleased to provide our response to the Competition and Markets Authority consultation.

## **Background**

The Good Funeral Guide is a not-for-profit social enterprise company, founded by Charles Cowling in 2008. It occupies an unique position of an informed outsider that has observed and commented on the funeral sector for over a decade.

The Good Funeral Guide does not accept advertising or investment from any funeral related or other business, and relies entirely on funding from donations, payments for accreditation and subscription payments from members of the [Good Funeral Guild](#), a voluntary membership organisation for the dissemination of funeral information.

The directors and CEO of the GFG are experienced, knowledgeable experts, who are all committed to improving the experience of bereaved people when making arrangements for a funeral. None have any personal financial interest in a funeral directing business, group or crematorium.

As outlined in our Memorandum and Articles, the purpose of the Good Funeral Guide is to provide benefit to all bereaved people in the UK by supporting and empowering them to make informed choices when selecting funeral service providers and funeral merchandise and enabling them to play an informed role in planning and creating their funeral ceremonies.

Wholly independent of the funeral industry, the Good Funeral Guide is a free consumer advice and advocacy service, providing accessible, authoritative and comprehensive information for everyone involved in end of life matters, especially the death of someone close to them. Information on all aspects of funerals is available free of charge from [our website](#) along with telephone or e-mail advice where required.

As part of our provision of information, the Good Funeral Guide runs an acclaimed accreditation scheme for funeral directors who we feel are worthy of recommendation and who we would trust to care for our own relatives. These companies are visited and key staff interviewed before becoming eligible to be listed as Good Funeral Guide Recommended funeral directors, and a review of each is published in our [online directory](#) and updated regularly.

Since the Good Funeral Guide was founded, we have published over 3,000 blog posts on the [GFG Blog](#), frequently exposing and criticising poor practice within the funeral industry.

From time to time we are contacted by whistle-blowers or people with serious complaints about an experience with a funeral director, which we do our best to address with the companies concerned or their trade associations. We have also received information from whistleblowers, concerned members of the public and individuals who have been the recipients of intimidating behaviour by others in the funeral industry. Examples of some of these communications are attached as confidential appendices 4 – 7.

## **Response**

The GFG welcomes the provisional findings of the CMA in the Interim Report published on 29<sup>th</sup> November and is fully supportive of the proposed intention to make a Market Investigation Reference.

As outlined in our original submission, we are of the strong opinion that the funeral sector as a whole is not functioning well. We agree that there are significant areas of concern which the Interim Report has identified, and as indicated above, we are happy to provide further proof of poor practice by supplying some of the information that we have received in the confidential appendices attached.

In order to protect individuals who have supplied us with this information, we request that appendices 4, 5, 6, 7, 10 and 11 be held as confidential, however we are happy to include some of the information, suitably anonymised, for publication in our submission below.

**In response to the questions posed as part of the consultation process:**

*'Do you consider that the CMA's analysis is correct with respect to the suspected features of concern in the supply of services by funeral directors and crematoria services?'*

With regard to the supply of services by funeral directors, the GFG considers the CMA's analysis and outlined areas of concern are entirely correct. Customers engaging with the funeral sector can be described as vulnerable due to the unique nature of a transaction that is carried out at a time of extreme emotional stress without clear information being freely provided to them before a decision is made about which company to employ.

Options available are limited by geography and the decision as to which company to employ may be influenced by a number of factors, including the retention of former trading names (with their associated local reputation), the preference of local nursing home staff, previous experience of attending a funeral carried out by a company or recommendation by friends or family.

Once a decision has been made about which company to use, it is unlikely that bereaved people will change funeral directors, even if they are not happy with the service being provided.

The stress of having to acknowledge that they have chosen an unsuitable provider and the difficulty (whether real or perceived) of confronting the staff or owners of the company and raising their dissatisfaction about whatever aspect of the arrangements they are unhappy with makes the effort of changing provider highly unlikely, even without the additional concerns of finding a suitable alternative.

Additional costs will also be involved, with the first company charging for the collection and storage of the person who has died, adding an additional disincentive for clients to consider changing funeral companies.

The simple result of this is that the first funeral company to be considered by a bereaved client almost inevitably will end up carrying out the funeral, no matter what.

The lack of awareness of the general public about the actual costs involved in carrying out a funeral also contributes to their vulnerability as consumers.

For most people, information about the cost of funerals is acquired colloquially or through the media. Figures quoted by life insurance companies' annual reports lead to an assumption that funerals cost many thousands of pounds, which is frequently repeated in articles and news coverage as factual.

According to the [Sun Life Cost of Dying Report 2018](#) *'In 2018, the cost of dying has increased again. In fact, it's now reached an all-time high of £9,204'*.

If the public is unwilling to research or engage with the funeral industry until necessary, then such figures quoted by the media easily become an assumed 'cost of a funeral' rather than a cumulative figure covering the average cost of a basic funeral, the average amount spent on the send-off and the average amount spent on professional fees. In comparison with a figure of over nine thousand pounds, the invoice from even the most expensive funeral director for their services will seem reasonable.

'Shopping around' by contacting a number of funeral companies and asking for a quote could be seen as disrespectful of the person who has died, and the subliminal societal pressure to 'do the right thing' or 'give them a good send-off' adds additional pressure not to be seen as looking for a good deal on a funeral.

People who have just experienced the death of a family member or close friend are highly susceptible to subtle influence as to what is appropriate and what is 'not quite the done thing', and frequently will make decisions that they feel will be approved of generally by the community around them.

If there is a long-established funeral company in their area which positions itself as traditional, respectful and good quality (whether or not this is actually the case), then it is likely that this company would be the expected choice for someone from that community.

Electing to engage an alternative funeral director to the locally known company could be perceived by others around the bereaved client as unusual, and potentially therefore, subversive to the accepted norm. For many people, particularly those recently bereaved, such a decision, that might draw social disapproval from those around them, could be considered too unorthodox and difficult to contemplate. At a time of emotional stress and instability following a death of someone close, the natural instinct is to be doing what others in the community will approve of, and not to be making decisions which might seem inappropriate or questionable.

The importance of unseen social pressure in decision making after a death has occurred cannot be underestimated, and is, we believe, a major factor in the majority of clients choosing to engage local, traditional funeral companies irrespective of their cost or calibre.

### **Absence of transparency of pricing**

The absence of transparency in pricing is something that the funeral industry should be ashamed of. There is no excuse for funeral businesses not to make their prices available online if they are prepared to hand out price lists to people who go into their branches and ask for them.

The two funeral trade associations have completely failed to require members to publish their prices online, and one can only assume that this is because influential members of both are reluctant to do so. Presumably the potential loss of membership fees from companies refusing to comply with such a requirement would impact their income too greatly.

Many price lists provided by funeral companies are unnecessarily complicated and confusing. Even for someone who hasn't just experienced a bereavement, trying to work out how much the individual components of a funeral are is sometimes impossible. Price lists are frequently laid out in such a way as to make it impossible for clients to feel able to opt out of individual services or components. The complexity of many funeral price lists is bewildering and unnecessary.

Good funeral directors will show a clear breakdown of individual aspects of their goods and services, allowing clients to select only those which they want to purchase. Unfortunately, the largest providers in the country do not offer this straightforward model. Examples of different price lists from large providers are shown in the attached appendices 1, 2 and 3.

The low price advertised by many companies is for their direct cremation service, which involves no ceremony, and delivery of the person who has died to a crematorium on a date and at a time of the company's choice, with nobody attending. This is far from what most people expect when they think of a funeral. As soon as the components involved in a 'normal' funeral are taken into account, the price leaps up by thousands of pounds.

As an example, price lists obtained from Co-operative Funeralcare branches in South West England show their total costs for a 'Cremation without Ceremony' is **£1,395**, including cremation fee and doctors' fees.

Their 'Simple Limited Choice' option, with no choice of date or time of the ceremony, their Simple Coffin, dressing the person in a supplied 'gown', allowing visiting during normal working hours, provision of a hearse and a funeral director on the day of the funeral and use of a wheeled bier (or mourners carrying the coffin) is priced at **£3,034** including cremation fee and doctors' fees, an increase of **£1,639**.

For clients who wish to choose a specific date and time, or to visit anytime, who would rather choose a veneer coffin, have a flexible cortege or use a limousine, this is considered as a 'Traditional Flexible Choice' option and the price goes up to **£4,269**, including the cremation fee and the doctors' fees. A further increase of **£1,235**.

But it's a package. So for clients who don't want to have the Co-op's Simple Coffin and would prefer a different one, or those who just want to choose the date and time themselves rather than being told when the funeral of their relative will happen, (the funeral that already costs over three thousand pounds), they will be asked to pay for the Traditional Flexible Choice option. Presumably this means with the inclusion of a limousine, whether you want one or not.

A further example is the frequent compulsory charge for a hearse, even if an alternative vehicle is preferred (and charged for). Funeral Partners 'Our Funeral Pricing Explained' leaflet states: *"Please note, if a horse-drawn or other specialist hearse is requested, we will still provide the motor hearse as outlined above, to convey any floral tributes and to accompany the funeral cortege."* The cost to the client for this additional vehicle to transport flowers from one place to another? **£560**.

These are just two examples. There are many, many more.

In appendix 1, we offer examples of pricing offered by two branches owned by Dignity, both trading under the names of the original owners. The branches are just two miles apart.

The first Dignity branch trades as A. Seaward & Sons in Tottenham, an area with a diverse ethnic community and one of the largest African-Caribbean communities in the country.

The second Dignity branch trades as W. Nodes in Crouch End, one of the most prosperous neighbourhoods in the country and with a greater proportion of white, middle class residents. Here are examples of the different price lists.

	<b>Tottenham</b>	<b>Crouch End</b>
Our Service to You:	£1,705	£1,095
Our Service to the Person who has Died:	£1,045	£ 795
Your Appointed Funeral Director:	£ 720	£ 460
Our hearses:	£ 720	£ 395
Total for the above:	<b>£4,190</b>	<b>£2,745</b>

Just for clarity, clients from a diverse community will be charged £1,445 more than clients from a more prosperous, middle class area, for exactly the same service, presumably provided by exactly the same staff, using exactly the same vehicles.

The layout of the price lists from the two branches and the terminology used indicates a calculated intention to appeal to the different expectations or traditions of the communities served by each branch.

For example, the Tottenham branch lists embalming above 'Your Funeral Director' at a cost of £101, and states, *'We will ensure every available care is taken to delay the natural processes that occur after death. However, as members of the National Association of Funeral Directors we recommend the peace of mind that embalming brings. You will be advised on this and we will require your consent.'*

At the Crouch End branch, embalming is far less prominently listed at the foot of the page, under 'Frequent considerations'. The description states, '*Embalming is a personal choice. In some circumstances we recommend the peace of mind that embalming brings. We will discuss this service with you.*' At Crouch End, embalming is charged at £150.

The Crouch End branch includes a walnut effect or teak effect coffin at £150 in their breakdown of the components of the Full Service Funeral, bringing their total to £2,895. At Tottenham, the inclusion of the low cost coffin in the 'From £4,340' price of the Full Service Funeral isn't specified, instead the £150 coffin is listed alongside the other coffins in their Traditional Collection. Presumably because including it in the breakdown might deter clients from choosing a more expensive alternative.

Prices of the other Traditional Collection coffins vary depending on which branch you've chosen too:

	Tottenham	Crouch End
The Chiltern coffin	£440	£290
The Purbeck coffin	£750	£495
The Glastonbury coffin	£1,250	£995

In an effort to bring this outrageous pricing to public attention, we wrote about it on the [Good Funeral Guide blog](#) on December 5<sup>th</sup> 2018 – transcript attached as appendix 8.

In appendix 2 we provide price lists from a number of Funeral Partners branches in the South West of England which show a disparity between the prices charged for exactly the same services. Appendix 9 shows the differences in tabulated form. We understand that Funeral Partners use the same vehicles and staff to service all 5 branches.

It appears that a management decision has been made that clients from Dawlish will be prepared to pay significantly more for the same service than clients visiting Funeral Partner branches in Exeter or Torquay.



### **Absence of transparency of practice**

In addition to the bewildering opaqueness – or deliberate manipulation - of pricing, there is a similar scandal in the lack of transparency about what actually is done behind the scenes, i.e. how companies carry out their work. For too long, the industry has relied on not being asked questions by clients. All decent funeral companies should be willing to explain to clients exactly how and where the person who has died will be cared for, and by whom.

As an example, most clients will unquestioningly accept charges for ‘collection and care of the deceased’ which in some cases may be over £1,000 (see appendices 1 – 3 for detailed price lists) without realising that they are being asked to pay this amount of money for their relative to be one of several people collected at the same time from a hospital mortuary and driven in a van to a hub, where they will be stored on a tray in a multi-body fridge until being placed into their respective chosen coffin.

Each client organising a funeral of each person collected on a van will be paying the same charge for ‘collection and care of the deceased’. Two, three or sometimes four people might be collected at the same time, by the same staff, taken to the same hub and placed in a fridge.

This practice effectively means that a couple of hours work by a couple of staff on average wages can potentially net the company involved up to four thousand pounds.

If clients were to challenge why this aspect of the funeral director’s services cost so much, it would be difficult, if not impossible to justify.

### **Absence of transparency of ownership**

We believe that all funeral companies should trade under the name of the owner of that company, not masquerade under the name of the former owner and thus gain business from unsuspecting clients who believe they are engaging a company they know from former experience.

It is common practice for companies that have acquired other business to continue to heavily promote the year the original business was established but not highlight the fact that ownership is now in completely different hands.

As examples of this blatant misrepresentation, the businesses below are all owned by Funeral Partners, but describe themselves on their websites in the following ways:

*'E. Sargeant & Son Funeral Directors was established in 1712 in the reign of Queen Anne and is one of the oldest businesses in the country. We have had a branch at 40 Church Street in Slough since 1922 and acquired a branch in Windsor in 1923. Our third branch, in Maidenhead, opened in 1991.'*

*'John Nodes Funeral Service has held a presence in London since 1828, with branches in North Kensington, Kensal Rise, Cricklewood and Harlesden some of which have served their communities since 1828.'*

*'Woking Funeral Service is the oldest funeral directors in the town, having served local families since 1880. We have branches in Knaphill and Woking and are active in supporting our communities.'*

*'Gillman Funeral Service is here to provide comfort and support and help you create a funeral that reflects the life and interests of your loved one who has passed away. We have been serving families in South London since 1920 and have branches in Balham, Battersea, Carshalton, Mitcham, Norbury and Tooting.'*

All the above websites only make reference to Funeral Partners in any way on their home page with a small statement at the foot of the page 'Part of Funeral Partners Ltd.'

As further illustration that this is common practice in the industry, we offer examples of Dignity branches promoting themselves similarly on their websites – all copied exactly below, complete with grammatical and spelling errors and varying years of establishment cited for the same company:

*'We are J H Kenyon Funeral Directors in Hampstead and you can depend on us to arrange and conduct a beautiful service that will celebrate your loved one's life, in a way that is personal and meaningful. We have been helping families in London since 1780, and over the centuries our name has become well-known and trusted in our community.'*

*'We are J H Kenyon Funeral Directors in Kensington and Chelsea and we are based in a charming parade of shops on Kensington High Street. Our funeral home has been recently refurbished with a brand new, modern interior and beautifully decorated on the outside to welcome you and you family during your time of need. Upon visiting us, you can still find some of the historical features from our previous funeral home, such as the original wrought iron signage.'*

*'Ever since we began helping families as Carriage Masters in 1870, our name has continued to be a symbol of trust and respect in our London community. Our founder, James Kenyon and his son Harold had a caring nature which they were well-known for, helping families give there loved ones they farewell that they wished for, as well as doing all they could for charities and the homeless.'*

*'At J H Kenyon in Westminster, we are a well-known and trusted part of our London community, after supporting families since the 1860's.*

*The knowledge and principles of our founding family have been passed down over the generations. We keep our traditional values the heart of all we do, while also adapting to the needs of the ever-growing and changing community that we love.*

*We feel privileged to have arranged funeral services in some of London's most famous and beautiful locations, including Victoria, Pimlico, Churchill Gardens Estate, Roman Catholic Westminster Cathedral and St. Margaret's Westminster Abbey. We have also been entrusted with the funeral arrangements of Sir Winston Churchill, which was the largest attending funeral in the history of Great Britain.'*

*'We are Frederick W Paine Funeral Directors. We have been serving our local community of Kingston since 1908, from the oldest of Frederick W Paine's funeral homes.'*

*'We are Frederick W Paine Funeral Directors in New Malden, and we have supported our local community since 1886.'*

*'Frederick W Paine Funeral Directors in Esher would be honoured to arrange a funeral service for your loved one. We promise to give you our uncompromising compassion and careful guidance, every step of the way. We are renowned in South West London for our exceptional quality of care and long history of looking after people. For over 125 we have been at the heart of the community we love.'*

*'We are Thomas B Treacy Funeral Directors in Clerkenwell, London. We have served bereaved families in Clerkenwell, Islington and beyond since 1925, and we are the closest funeral directors to the City of London, based in a charming building on Rosebery Avenue.'*

*'We are Henry Paul Funeral Directors in Ealing and we have had the privilege of serving our Brentford community since 1919.'*

*'At W S Bond Funeral Directors in Shepherd's Bush, our history of caring for families began over 150 years ago.'*

We do not think that claims such as those illustrated above are acceptable when the company referred to has been acquired by another business.

We feel such prominent and deliberate referencing is clearly intended to lead clients into making certain assumptions about trustworthiness, security and integrity which are likely to be inferred about a company that has been trading for many decades or centuries.

Most people reading such statements would feel reassured that the funeral business concerned had such long history of local knowledge and experience, without appreciating that the current owners have no connection with this other than having purchased the business.

We strongly urge the CMA to recommend close scrutiny of this practice as part of any further investigation.

As well as misleading promotion in online descriptions and advertising, many businesses do not differentiate their branches physically when ownership changes. In appendices 12 and 13 we offer images of shopfronts of various branches owned by corporate companies that are still trading under their original names. It is evident that the current ownership is not adequately displayed, in some cases being indicated only by a poster advertising pre-paid funeral plans stuck to the window.

Clear and prominent transparency of ownership is a simple requirement that should be imposed on any business that purchases an existing funeral director company, the ongoing use of the former owner's name should not be permitted other than as a subsidiary name as in 'NEW OWNER Name, formerly XXXX'.

Using logos or corporate colourways for fascia is not an adequate indication of ownership, and we again urge inclusion of scrutiny of this aspect of trading to be included in recommendation by the CMA.

### **Point of sale advantage**

The point of sale advantage of funeral businesses is apparent in the nature of the transaction. Clients are susceptible to suggestion, and frequently will select mid-range services and products in order to be close to the norm. Many funeral companies will take advantage of this by adding higher margins to their mid-range coffin.

Appendix II shows for coffin prices from a major coffin supplier for a selection of coffins available from funeral directors throughout the UK under 'white labelled' names at each company. To protect the individual who supplied this to us we request that appendix II remains confidential.

By looking at trade costs of typical coffins and then examining the price lists supplied to see retail costs for various types of coffins, the difference in margin is visible.

High margins are also frequently applied on popular coffin types, for example, Dignity branches in London currently charge £660 for a cardboard coffin, while the trade price for a brown cardboard coffin from a major supplier is under £65.

Most coffin suppliers will only supply funeral directors and do not sell coffins directly to the public, despite there being no legal requirement for a funeral director to be involved with a funeral.

Anecdotally, we are aware of pressure from large funeral companies on coffin suppliers to only supply the trade and not to deal directly with the public. With large contracts in place it is unsurprising that coffin suppliers are compliant. This 'trade only' market for coffins means that few people have any idea how much a coffin costs to purchase, and accept whatever prices are listed by the funeral director they have engaged. These prices can be inflated by as much as 500 to 600% by funeral companies, sometimes even more.

Many funeral directors list 'POA' against alternative hearses on their price lists. We consider this to be completely unacceptable, as the cost of hiring an alternative hearse will be known to them. Most providers send updated prices annually to funeral companies and certainly would make their prices available on request. Funeral companies unwilling to list prices for alternative hearses are therefore either unwilling to establish what the current cost would be, or unwilling to publish the amount they charge clients for some reason.

Again, like coffin suppliers, providers of alternative hearses rarely offer their services direct to the public, so the true cost to hire is obscured, and any mark-up applied will be hidden.

A refusal to list the cost of a hired in vehicle in a price list inevitably raises the question of how prices are arrived at for clients and whether these differ according to perception of ability to pay.

'Memorial products' also attract high margins and many are only available from funeral directors rather than as direct purchases. As an example, see appendix 10, where items from a retailer were recently promoted to funeral companies via a funeral industry social media forum as '*average product price sub £100, average family transaction £375*'. (As this was supplied to us by a concerned individual, we request that appendix 10 be held as confidential.)

Regarding self-regulation – this just hasn't happened. It was probably optimistic to have thought it would. Turkeys and Christmas come to mind.

### Crematoria services

Customers can be considered vulnerable for the reasons outlined above. In addition, many crematoria do not make it straightforward for members of the public to access information about pricing and availability of service times, or make it easy for bookings to be made without a funeral director involved.

The limited number of crematoria accessible to bereaved people in any area means that price and quality are rarely a factor in deciding which crematorium to choose. Convenience or previous experience or connection with a crematorium is far more likely to be relevant.

Planning issues and the high capital outlay of opening a crematorium have contributed to the relatively low number of crematoria available in any given area, however increasing the number of crematoria would not necessarily be desirable from an environmental viewpoint, and indeed, the current capacity of existing crematoria appears to be adequate from a practical point of view. The issue seems to be with competition between crematoria to carry out the required cremations.

One of the problems that has arisen over recent years is that instead of crematoria being simply the place of committal of the coffin after a full funeral ceremony in a church beforehand, with the decline in church attendance, many funerals take place entirely at the crematorium. This has led to people feeling unsatisfied with the experience of a 20 minute ceremony to commemorate a life, and the frequently heard reference to the 'production line' at crematoria, with hearses and groups of mourners arriving frequently throughout the day.

If alternative venues were chosen for funeral ceremonies prior to cremation, then the actual place of cremation would not carry so much impact, either from an aesthetic or experiential point of view, and clients might then consider the costs involved at the various crematoria available to them as more relevant.

*Do you consider that the CMA's analysis is correct with respect to the reference test being met in relation to the supply of services by funeral directors at the point of need and crematoria services?*

Yes

*Do you agree with the CMA's proposal to exercise its discretion to make a reference in relation to the supply of services by funeral directors at the point of need and the supply of crematoria services*

Yes

*Do you consider that the proposed scope of the reference as set out in the draft terms of the reference in Appendix F, would be sufficient to enable any adverse effect on competition (or any resulting or likely detrimental effects on consumers) caused by the features referred to in paragraphs 8.31 and 8.33 to be effectively and comprehensively remedied?*

Yes

*Do you consider that the features which the CMA has identified that may prevent, restrict or distort competition are capable effectively and comprehensively remedied by UILs (undertakings in lieu of a MIR)?*

No

*Do you have any view on our current thinking on the types of remedies that an MIR should consider (see paragraphs 8.66 to 8.86)? Are there other measures we should consider?*

### **Funeral director services**

Firstly, we consider it essential to recognise the absolute legal right for people to carry out a funeral without the assistance of a funeral director.

We think it is imperative that any regulation is applied only in the instances where companies or individuals receive payment for carrying out funeral directing services, and not where clients organise a funeral themselves or with unpaid voluntary assistance from friends, relatives or members of the community.

We also suggest that any community schemes and not-for-profit organisations such as the GFG [Community Funeral Service](#) should follow any guidelines and best practice that might be agreed as a result of future legislation for the funeral sector, but such organisations should be considered as outwith the remit of any regulation or regulatory body.

We believe that any potential regulation of funeral director services must cover all types of companies offering services connected with the disposal of bodies, including direct cremation or direct burial companies.

On the whole, we feel that the types of remedies suggested are wide ranging and comprehensive, and we particularly welcome the suggestion of requiring funeral directors to make their price list available online and to set out their prices to a standard format and / or to distinguish clearly between the price for those elements of a funeral which are essential, optional and third party costs in addition to quoting package prices.

We agree with the suggestion of recommending changes to the regulatory framework and of recommending to government that a standard code of practice should be drawn up for England, Wales and Northern Ireland.

We would like to be involved in any consultation on the code of practice as the only independent organisation involved in the funeral industry that represents bereaved people rather than funeral businesses. We consider the existing trade associations to be biased in favour of their members and therefore would not wish to see a code of practice arrived at by trade associations without scrutiny and input from other bodies.

We agree that funeral directors should be licensed, and agree with the suggestion of the establishment of a regulatory body with the capacity to withdraw licences to operate should funeral directors persistently fail to meet standards set out in a code of practice.

With regard to licences, we feel strongly that licences to operate should be given to all existing and future funeral companies meeting the standards set out in an independently agreed code of practice, irrespective of whether individuals hold industry qualifications or not.



Many existing funeral directors (and others considering entering the sector) are exceptionally well suited to working with bereaved people and caring for those who have died, but have chosen not to undergo training courses offered by the industry. Acquiring a certificate or diploma in a subject demonstrates an ability to learn and pass exams, not necessarily the aptitude or emotional maturity required in daily contact with bereaved people.

With regard to CMA-led price regulation, if the establishment of a specialist regulator is likely to take a long time, the suggestion of CMA-led price regulation mechanism seems a sensible interim measure.

### **Crematoria**

We support the suggestion of recommending to government that a specialist sectoral regulator be established, or that the remit of the funerals regulator be extended as described in the report, with capacity to introduce price regulation.

We suggest that any potential regulation of the crematoria sector makes provision for alternatives to flame cremation that are not as yet available in the UK.

We agree with the suggestion of recommendation for guidance to local authorities as described, and we support the suggestion outlined of changes to the planning system as described in 8.79a.

We are not convinced that the suggestion of relaxing the provisions of the 1902 Act would result in the hoped for reduction in barriers to entry.

The option of requiring divestment of assets seems a sensible one if there are two or more crematoria owned by the same operator in a given area.

We do not have a view on the suggestion of requiring existing local-authority owned crematoria to be put out for tender.

*In addition to the above, the CMA would also welcome evidence and views on the following matters:*

*Quality of care of the deceased: we have received anecdotal evidence that there may be varying standards of care being applied by funeral directors and would like to understand how widespread such issues may be. We would therefore like to hear from people who have witnessed standards of care which they considered to be unacceptably low.*

We attach in appendices 4 and 5 examples of unacceptable care of people who have died, however to protect the identity of the individuals concerned we request that these details are held in confidence.

*Issues specific to religious groups that are not covered in this report: we have focused our work on the transactional aspects of funerals involving funeral directors and crematoria. We believe that the issues we have identified in relation to those specific aspects would essentially be similar across all faiths (to the extent that the way they organise funerals involves transactions with funeral directors or crematoria. We are keen to find out whether we may have overlooked any issue of relevance and will seek to engage actively with the representatives of the major faiths.*

Apart from major faiths, we believe it is essential to also consider the large – and increasing - number of people who choose to have a secular funeral and who are currently unrepresented as a group.

Funeral directors act as the gatekeepers between clients and secular celebrants, frequently using a small number of local celebrants who are known to them. While this might seem acceptable, it has the effect of a ‘closed shop’, discouraging choice for clients who will generally accept the funeral director’s suggestion without question. This might result in clients being allocated a celebrant who is available or has low fees, rather than one who is suitable or adequately skilled.

The fee paid to the celebrant is largely based on the fees set by the Church of England for the fee payable for a minister to carry out a funeral service at a crematorium (currently £190). This fee is made up of a payment of £161 towards the Diocesan Board of Finance, and £29 to the Parochial Church Council.

In contrast, celebrant fees are likely to form the main income for that individual. In a recent survey of funeral celebrants, almost half indicated that their fees for funeral ceremonies were between £180 and £209 – less than the average cost of the use of a limousine on a funeral. To us, this does not seem reflective of the value of the work of a good celebrant, who is responsible for creating and delivering a fitting funeral ceremony that commemorates an entire life, and which, if well written, will contribute greatly to the wellbeing of those who experience it.

We believe that the current system of funeral directors allocating celebrants to clients is restricting the quality and choice of funeral ceremonies available to bereaved people.

## **Conclusion**

In summary, the Good Funeral Guide believes that a complete overhaul of the funeral industry is long overdue.

We strongly support the intention to make a Market Investigation Reference in the interests of bereaved people who we believe are currently not being well served by a transparent and fair market.

Existing funeral service providers almost all demonstrate complacency and an unwillingness to change, with just a few established firms being the exception to this, all of which are among the companies who have undergone the GFG accreditation process and can be found on the [GFG Recommended Funeral Director list](#).

The funeral industry trade associations, in particular the National Association of Funeral Directors, have failed in self-monitoring and self-regulating the funeral sector.

They have no excuse for not requiring transparency of ownership. Nor is there any excuse for not requiring members to list prices online immediately. That the trade associations have failed to do so indicates to us that they are beholden to those members who are unwilling to publish their prices online and therefore we believe that the trade associations do not ultimately have the interests of the consumer at heart.

While appreciating that the CMA is likely to take representation from the existing trade associations into consideration, we consider that neither the funeral sector trade associations nor the major UK funeral companies should be influential in any future regulation of the funeral sector.

We feel it is essential that any future regulation be independent of influence from providers or representatives of those providers that have enabled the current unsatisfactory situation to arise.

Rather than seeking advice from the trade associations or large companies currently operating within the sector, we recommend that the CMA consults closely with and enlists advice from the small number of intelligent, brilliant new funeral providers who are working with an entirely different approach that is wholly customer led.

We suggest that the following funeral providers are best placed to help shape any future regulation of the sector that is intended to put the interests of bereaved clients first:

Louise Winter of [Poetic Endings](#)

Fran Glover and Carrie Weekes of [A Natural Undertaking](#)

Lucy Coulbert of [The Individual Funeral Company](#)

Anne Beckett-Allen of [Rosedale Funeral Home](#)

Johanna Williamson of [Albany Funerals](#)

Jane Bennett of [Bennetts Funeral Directors](#)

Cara Mair of [ARKA Original Funerals](#)

Sarah Jones of [Full Circle Funerals](#)

Judith Dandy of [Dandelion Farewells](#)

Hasina Zaman of [Compassionate Funerals](#)

Jenny Uzzell of [Saint and Forster Funeral Directors](#)

Holly Clarke of [Holly's Funerals](#)

Poppy Mardall of [Poppy's Funerals](#)

It will not escape notice that all of the above are women.

For too long, the world of funerals has been dominated by a patriarchal approach, an emphasis on profit and a corresponding focus on the provision of expensive vehicles and the upselling of products.

Funerals, once the simple community response to a death, have become outsourced, commodified, industrialised and profit driven. It is time to change this.

If the funeral industry is to become fit for purpose as a service to the bereaved people of the UK in the 21<sup>st</sup> century, we believe that the voices of the inspirational women above need to be listened to as a starting point.

Fran Hall  
CEO The Good Funeral Guide