

STATEMENT OF ISSUES – WRITTEN RESPONSE

Name: Ken West MBE (for services to burial & cremation) Life Member ICCM (Dip.), ILAM (dip.) DMS (Credit) Hon. MA (Durham University) RHS Cert

Status: Retired 2006 and subsequently author of 'A Guide to Natural Burial' (2010) and 'R.I.P. Off! or The British Way of Death' (2012).

Experience: 45 years in bereavement services at Shrewsbury, Sheffield, Wolverhampton, Carlisle, Cardiff & Croydon. Each of those services included a principal council crematorium and various numbers of cemeteries. At Carlisle & Cardiff I also offered natural burial and at Croydon, managed the mortuary. I have also arranged or been closely involved in arranging four family funerals in recent years.

In the 1970's I introduced the first individual burial of stillbirths. In 1990 I compiled a feasibility study of natural burial, opened the world's first site in 1993, provided the first burial shroud, wrote the Charter for the Bereaved in 1995, then the subsequent Assessment Process, and provided the first re-usable coffin (now called a coffin cover). I also fought for the acceptance of communal foetal remains for burial and cremation.

Blog: stonehengepensioner.com (this site includes posts on cremation, natural burial, etc.)

COMMENT: I have to compliment you on the compilation of the document and summary. The subject is complex and difficult to address. This complexity is my first comment.

12(b) Here you comment on aspects of quality provided by funeral directors and crematoria that customers are likely to find particularly difficult to engage with. Over my career, customers consistently said, 'If only I had known'. In my opinion, crematoria managers should be skilled in marketing. It is not their role to blindly accept time honoured practice, in particular the so called traditional funeral. Such funerals demand high input and must, therefore, be relatively expensive. Too often, crematoria, especially the private sector, see their customer as the traditional funeral director. They have little or no direct contact with the bereaved or local community. Gratuities given by funeral directors to crematoria staff can influence this relationship. Consequently, ways in which people might challenge the status quo are not developed or offered. As an example, invitations to members of the public to arrange funerals without a funeral director are evident ONLY at local authority crematoria managed under the Charter for the Bereaved. Private sector crematoria will not do this because they know it to be inflammatory to their principal customers, the traditional funeral director.

The impact of bereavement is well understood and is too often used as a reason to withhold information. At times, we must be lead by the bereaved, at others, we must expand their understanding. My advantage, as a local authority employee, was that I could often wear three hats. I could expound on cremation, conventional burial and natural burial. I did so regularly at talks given to nursing and care home staff, local organisations including the WI and Quakers, and to the large numbers who attended Open Days and cemetery walks. That gave people sufficient information to challenge me over which service was the most meaningful to them. Because they were not experiencing a personal bereavement, questions were often very open. These were usually on how to manage a funeral, reduce costs and reduce impact on the environment.

I was often personally challenged in wearing these three hats. As previously a long term cremationist, people often sensed my increasing preference for natural burial. I tried to avoid any hint of bias but that can be difficult when passion intrudes. Bias is endemic in funeral directing. In talking to people about funerals, I was often told about past funerals and the funeral director involved. With my local experience, I could tell them the kind of funeral they had simply by knowing the funeral director. The contrast between two funeral directors could have a massive influence. For instance, the customers of one might purchase a cremated remains grave for perhaps 70% of all the cremations they arranged. For another, this figure might be only 10%. The difference was clearly due to the influence of the funeral director, not least their desire to upsell memorials. Having a commercial interest in selling memorials after a cremation must be a concern. I recall some years ago that an informal survey of memorial sales after cremation was done between private sector and public crematoria. The difference between the two was massive. The private sector raised vastly higher income because of aggressive marketing when compared to the more passive approach in local authorities.

This marketing can, and does, step over the line into serious instances of misinformation. For instance, a particular funeral director would describe the crematorium Garden of Remembrance as little better than a 'paupers' grave. He would stress to the bereaved how the cremated remains were placed below ground, without a casket, without ceremony and on lawns where many thousands of others were closely interred. This approach inevitably encouraged the bereaved to take the remains away and purchase an individual cremated remains grave and place a memorial, all of which considerably increased the cost of the funeral. Conversely, when I explained the purpose of the Garden of Remembrance, I stressed the communality of the process, how people were all together and were gradually absorbed and returned to the earth. I rarely had to support this by reminding them that using the Garden was included in the cremation fee, and thereby low cost. I would like to think that funeral directors have stopped this approach but recent experience proves otherwise.

For example, in 2018, a local financial advisor invited a funeral director to address the 'Retirement Cafe' which my wife and I often attend. As I anticipated, he ignored all mention of prices and avoided any reference to services that he did not provide, such as Direct Cremations. Worse, when I asked him about natural burial, he denied that such a service existed. He probably did that because the two local natural burial sites are managed by competing funeral directors who either deny, or make it difficult, for other funeral directors to access their services. As in the past, this family funeral director painted himself as resembling a 'social service' whilst neglecting to say that he sent an invoice at the end. The people attending this Retirement Cafe were treated to a classic case of disinformation.

My approach to assessing the quality of a crematorium is twofold. Firstly, I want information and transparency, either via a website or handouts. Secondly, I want little prescription; I want yes rather than no.

For example, on the information point, at Carlisle we could offer people over 30 leaflets, all free of charge, extending to a full description of how to manage a family arranged (DIY) funeral. We sold coffins direct to the bereaved, in part because many funeral directors refused to stock cardboard coffins at that time (1990's) for our new natural burial plot. For cremation, we offered a reusable

solid wood casket with a cardboard coffin inside. We could store bodies overnight or for longer periods. We could advise people which funeral director would collect a coffin from us, pick up the body and deliver it to the crematorium for a set fee. The coffin could then be stored for however long the family desired leading up to the service. That dispensed with the need for a hearse, limousines, a professional funeral director or their bearers. I explained that it was only by reducing these 'inessential' aspects of the bundle that funeral costs could be minimised. I cannot claim to have introduced Direct Cremations, but this initiative, at Carlisle and other local authority crematoria in the 1990's, was a precursor to this new internet service. Funeral directing, at the time, despised this activity and many still do. The activities of these funeral directors at that time formed the basis of my book ['R.I.P. Off! or: The British Way of Death'](#). At Carlisle, the initial firms who were going to provide coffins and a hearse direct to the public, withdrew their services. I have no written proof but both suppliers were pressurised by [X].

You also need to understand that then, as now, local authority crematoria were not permitted by law to undertake in-house funeral directing. Funeral directing was principally defined to include 'the conveyance of the deceased'. Having to find funeral directors who would collect and deliver a body to the crematorium for a fixed fee was a constant problem. The bereaved were always shocked that this was the one function that we could not offer under our own management.

As regards the competitive environment on customers at that time, I have no doubt that the impact of funeral directing was detrimental. They then, as now, want to maintain the 'traditional funeral'. I have no desire to be divisive, but the majority of initiatives improving services to the bereaved have come from the public sector. The individual burial of stillbirths, natural burial, DIY funerals, eco coffins, re-usable coffins and shrouds, recycling of metal after cremation, were all introduced through local authority employees, usually working as members of the ICCM. It was this experience that enabled the ICCM to issue a comprehensive Charter for the Bereaved. The Charter was opposed throughout its conception by funeral directing and embalming organisations. This was precisely the experience of those who proposed the Dead Citizens Charter in the late 1990's. That was abandoned in the face of constant acrimony.

I am aware that innovative private sector firms have also found this arena difficult. A funeral director in [X] produced a low cost reusable coffin but found it almost impossible to sell to funeral directors. Any public crematoria I managed advertised this product and supported its use. I do not believe that this was the case at private crematoria. I am no fan of private crematoria, finding them totally lacking transparency and innovation. A few years ago, with the death of my mother in law, I approached [X] Crematorium, then managed by the [X], to ask if I could arrange a cremation. The DIY option was not mentioned on their website. After being referred to various staff, the answer was a hesitant yes, providing my coffin was purchased from a specific manufacturer. I approached this firm via the internet and, only after I had taken some time to select a coffin, did the site demand my details. It then stated that they only sell to bona fide funeral directors and my order was rejected.

Regarding private crematoria, in recent years, I prepared a post on my blog about the recycling of metal residue after cremation. This is called ['Are you a Charitable Body'](#). Aware that most public crematoria are transparent on this issue, I read a considerable number of private crematoria websites. There was little mention of anything related to metal residue or what they did with it. If

they did recycle it, then they retained the income. Perhaps worse, they may still inter the waste metal in the crematorium grounds, which is an environmental hazard.

COMMENT - THE ENVIRONMENT

Your statement of Issues gives me some cause for concern as regards the environment. Under 'market opening measures' you make reference to increasing access to cremation services by encouraging the building of new crematoria. The building of new crematoria, mostly by the private sector, is detrimental to the environment. Lacking transparency, these crematoria disclose nothing about how they manage their cremators.

The ICCM can provide comprehensive information on how to operate a cremator efficiently. At its most basic, a cremator should be pre-heated and then used for long periods. The first few cremations use more gas and burn less efficiently. As the refractories heat up, so efficiency increases and later cremations require no gas at all. Not inputting gas decreases overall emissions, of course. The optimum is 12 hours operation and eight cremations per cremator. Eight cremations per day for five days requires a minimum 2000 cremations per year.

The private sector proposes new crematoria where they can identify a catchment of a minimum 800 cremations per year. That is the baseline for profitable operation. Few private crematoria reach the 2000 figure for efficient cremator operation. The solution would be to hold over cremations, except those that demand same day cremation, and amass sufficient to operate for a 12 hour period. Using their websites, not a single private crematorium mentions this issue. Neither do they promote the use of eco coffins. They are content to cremate veneered particle board simply because that is what the funeral directors want to use. These appear as real wood to the bereaved. The veneered coffin costs perhaps £50.00 to manufacture and allows a huge mark-up. On these and other ways in which people can objectively reduce the impact of a cremation, the private crematoria are mute. I highlighted this issue in an article in [The Ecologist](#) in January 2019.

Every new crematorium reduces the cremator efficiency at an established one. Building more might improve access for the bereaved but it offers significant environmental challenges. My own view is that the crematorium chapel services and the crematory should be decoupled. The cremations should be taken to a large, centralised crematory. This is the only way to manage the costs of abatement, which must increase dramatically in the future. A government zero emission target has already been set and will be a challenge. Uncoupling releases the chapel from time restraints created by the availability of a cremator. Services, then, can be offered seven days a week and in evenings. This would meet the needs of our changing society. So called out of hours services should not be subject to significant additional fees. It is funeral directors that virulently oppose this uncoupling, and because the private sector treats these as the customer, such innovation is not taking place.

CREMATORIA CATCHMENT

I am aware that you will study the catchment of crematoria. In Carlisle, our crematoria drew cremations from West Cumbria. Those cremations would have been expected to go to Distington Hall, the crematorium at Whitehaven. The CE of that authority brought the crematorium manager to Carlisle to see why we were so effective. The facilities and high quality horticultural standards did

constitute a USP. But the main reason was probably the constant coverage we obtained through the media on initiatives to help the bereaved. [X].

In recent years, I have been aware of funerals travelling to crematoria some distance away. Having asked the family why, they seemed somewhat bemused as to the reason. They had simply gone along with the advice of the funeral director, whom they were loathe to challenge. In those cases, the more distant crematorium used was a private one, the closer crematorium a public one. I suspect, as do many, that the funeral director is given a hefty discount on the monthly account by the private crematoria. In the past, the crematorium issued a receipt to be given to the bereaved as evidence of payment. If this continues, does the receipt show the discounted sum, or the advertised price? That, of course, cannot be checked because the private crematoria rarely advertise prices.

As an example of this, I recently visited [X] Crematorium [X]. I was well received and the facilities are excellent. Their website professes to offer transparency and yet the cremation offered is bundled. There are no individual charges shown. The bereaved can only access the crematorium if they use the funeral director who owns it. All other funeral directors are excluded. The environmental aspects of cremation are not mentioned in their website. The site exhibits fine photography and is a good example of greenwashing. In fairness, they offer long periods for cremation services. Yet this means that the expensive cremators and abatement plant spend the majority of their life lying idle. Even when used, they will be switched off well before they reach optimum performance. This capacity is an expensive luxury, one not good for the environment. As it is, or course, they are not required to give any information on these issues.

If I contrast this site with the local authority [X] Crematorium, the difference in approach is obvious. The [X] website gives immediate access to an online reference copy of the Charter for The Bereaved, all 102 pages. That is easily the most comprehensive guide to funeral rights in the UK. No bereaved person could doubt their transparency. Private sector crematoria do not support the Charter for the Bereaved.

THE PROFITABILITY OF FUNERAL DIRECTORS

Identifying the cost of premises and vehicles is simple enough with a funeral director. Many of them attract too few funerals and capacity, in the form of vehicles unused most of the time, is typical. In the past, funeral directors contracted an independent carriagemaster and that ensured vehicles were used to a much higher degree. Where the funeral directors will bamboozle is on how much time input is charged against each funeral. I have discussed this with funeral directors in the past, principally in my role as the ICCM Charter Organiser. The profession use this intangible figure to obscure the pricing of a funeral. Whereas I might have suggested 20 hours input, they would hover around 50 – 60 hours.

The problem here is that funerals vary greatly. As a person ages, the number of people attending or taking an interest in the funeral reduces. Older people are more resigned to death and often just want everything tied up quickly. It itself, this all means less phone calls, less wreaths, etc. as well as less viewing of the body. At the crematorium, with few mourners, such funerals proceed smoothly and quickly leave the premises. The opposite is true when a young person dies.

As to market opening remedies, one of the principal sources of funeral director income is the mark-up on veneered particle board coffins. Until recent years this was a relatively independent British product. Before I retired, a manufacturer told me that he made 3% profit on a coffin, about £1 on a £30 coffin. He was furious that funeral directors constantly threatened to withdraw their purchases unless he reduced his charge. He knew that at the time, coffins retailed for £400 - £500. In 2018 a Dutch coffin manufacturer told me that such coffins were now imported from China, and have very dubious environmental origins. New manufacturers find it very difficult to access the market and environmental products, with initially very low numbers, cannot match the prices. The supply of the coffin should be unbundled from funeral packages. My concern then is that the bereaved obtain the advice they need on where they can find alternative suppliers.

Although the supply of wreaths, memorials and funeral teas are not bundled, I still retain concern about aggressive marketing over their supply. In the 1960's, when I began work in bereavement, none of this aggressive selling existed in funeral directing.

CREMATORIA – LOCAL AUTHORITY SCENARIO

I suspect that when you consider how local authority crematoria set their fees, the 'going rate' is likely to feature strongly. I cannot excuse this but perhaps the history of the service should be considered. When I began work in bereavement services in the 1960's, it was considered more a social service than a business. Far more councillors took a personal interest in the service and one was given this portfolio. As a consequence, fees were generally kept low. All bereavement services operated at a financial loss and the shortfall was charged to ratepayers.

During the 1980's and particularly the 1990's, increasing income and reducing deficits was a focus for most managers. The introduction of CCT significantly reduced grounds maintenance costs. Unfortunately, it also removed in-house staff presence and reduced service quality to the bereaved. The maintenance staff no longer knew the service and could not talk to or assist people in the grounds.

As bereavement services were a relatively small council operation, most were placed in larger directives. Within parks is typical (as we all cut grass) but some were more considerate and used public health or the legal section. The less considerate put them with 'dog fouling & markets'. What is evident is that none of these directorates were remotely skilled in a service that had to compete with the private sector. Whether because of directorates or not, from the 1990's, a progressive cut in expenditure budgets has had serious impacts. Hidden maintenance costs like drainage systems were effectively abandoned. Cemetery memorial maintenance is poor and a backlog of unsafe memorials exists in many cemeteries. Had any crematoria reached a point of 'profit', this would have been lost, as it were, in the considerable deficits that all council services incur, other than car parks.

Every crematoria service I managed was associated with cemeteries, often sites dating back to Victorian times. I typically managed 100 acres of old cemetery space for each crematorium. As crematoria income increased year on year, cemetery income declined. The introduction of natural burial was the first time that cemetery income actually increased. Of more significance, by placing far more emphasis on nature conservation, natural burial supported moves to turn old cemetery space into conservation zones. At Carlisle, for instance, this involved 20 acres and dramatically reduced our cemetery maintenance costs.

In the authorities where a crematorium is associated with cemeteries, the crematorium still represents a significant source of income to the cemeteries. After any cremation, the bereaved will often identify a cemetery, often quite old, and yet close to where they live. If small cremated remains graves are offered at that cemetery then a significant number of burials continue. The sale of burial rights, interment fee and memorial fee, are vital sources of income. These burials also maintain a human presence in old cemeteries and are important to community cohesion. It is essential not to break this link between the crematorium and local cemeteries.

It will be evident from these details that crematoria integrated with cemeteries are often difficult to identify as stand alone cost centres. The crossover by staff and vehicles often means relatively arbitrary figures have to be allocated. It is even more difficult where a central administration centre covers both services. Such a centre will usually spend far more time on cemetery enquiries, not least because burials stretch back further and involve non computerised work.

You might appreciate at this point why this kind of local authority service is by far the best source of advice for the bereaved. My recent experience confirms that private crematoria know only cremation. They cannot offer alternative perspectives on burial or natural burial. Worse, they choose to ignore the environmental issues per se. Too often, because they have to work to a head office script, they cannot unbundle the product. The bereaved either take what's on offer or do not. By comparison, my local authority staff were empowered – the answer should always be yes, that we can find a way through a person's difficulties. This was because meeting the person's needs was what mattered, not primarily income. The staff I knew forged relationships with grateful bereaved residents and so were constantly given small gifts of flowers or chocolates or received cards and letters. This kind of service harks back to our social service background. It clashed violently with the way government forced change through the Audit Commission. They demanded that as local authority cemeteries and crematoria had a parallel private sector side, they should act more like the private sector. They did not do this with other local authority services like parks or libraries. This commercial drive has not, as promised, driven down prices. What it has done is alert rapacious companies to the peculiar weakness of the bereaved as customers. Consequently, funeral costs have risen year on year.

My market test as regards these comments is a simple one. Private crematoria always had the legal powers to entirely change the market. They could have immediately offered an enhanced Direct Cremation to people in their locality. With ample body storage, they could have collected bodies, brought them back to the premises and then completed everything on site. I have operated this one stop shop approach and nothing could be simpler. Meeting the bereaved to complete all the forms will take about 30 minutes. The family would return with the disposal or coroner's certificate. The crematorium will collect and pay for the cremation medical certificates. The family return for the ceremony, bringing any wreaths with them, and the ceremony takes place. As only one chapel attendant is needed, this could inexpensively take place all day and evening, every day of the week. Used this way, the chapel capacity issue becomes irrelevant. The body would be held over so that sufficient cremations were available to operate the cremator for 12 hours. Private crematoria choose not to do this because the funeral directors fear and despise the idea. As stated earlier, the funeral director is their customer; not the bereaved.

My conclusion is inevitable and damning, that that the progressive increase in government involvement, far from reducing the cost of funerals, has increased them.