

Quaker Social Action congratulate the Competitions and Market's Authority's decision to carry out a full review of the funeral industry, and we respond to the CMA's summary of issues and potential remedies below. We have drawn our examples from the work of Quaker Social Action's Down to Earth service, an independent helpline-based service helping people in financial need to plan an affordable and meaningful funeral. The examples form a separate Appendix but are referred to in this document.

Issues

1a What customers consider to be the essential components of a funeral, what they understand to be a good quality funeral or crematorium and how they assess quality when dealing with funeral directors and crematoria.

Down to Earth helps a diverse range of clients, and what is essential for one client, will be different for another. We help clients look at ways of reducing the cost and it is clear that each person will have different priorities, and this may be partly dependent on their own tradition, culture and circumstances of the death. For example, some clients will be able to consider a less expensive early cremation slot but for them the type of coffin holds high importance (example 2).

A few people will opt not to have a service (example 74), but others do not have the luxury of choice and choose a direct cremation (no service) purely to fit their budget (example 4). For those who are able to choose, many feel that a service is essential, and that not having one does not 'feel' right (example 30, 39, 56).

Many funeral directors' 'Simple Funeral' packages have restrictions on date and time, as well as other criteria, such as dressing the deceased in their own clothes (example 130). Some large chains do not offer any choice of date and time at all, which can be incredibly restrictive, and leaves clients having to decide whether to opt for a more expensive package or a family member not attending (example 5, 63, 131). The circumstances of the family, including how many people are attending, whether they can drive and their level of mobility can affect whether items such as limousines are essential (example 35). Many clients want to give the deceased a 'good send-off' without it being out of their budget (example 96).

What elements are regarded as essential can sometimes be somewhat muddled by the industry and what they subtly, or unsubtly market as essential. This is most concerning when funeral directors appear to upsell by saying an item is essential, or normalise it (example 10, 42).

In choosing a funeral director and assessing quality, many of our clients will use a funeral director their family has used before because they trust them (example 7), though this can cause issues if the independent funeral director, has been bought out by a larger chain, who often increase the price but the client will not necessarily be aware of this (example 98, see also Teresa's story, a Down to Earth client featured on this podcast: <https://iceandfire.co.uk/lifeontheedge/paynowgrievelater>). For those who had to instruct a funeral director at short notice, it can be difficult or unpalatable to consider changing funeral director and their loved one's body being moved, which may mean that quality is not the primary factor (example 61).

A good number of Down to Earth clients speak to a funeral director and 'get a feel' for them. They tend to assess quality based on customer service and funeral directors being kind and empathetic (example 4).

Methodology that the CMA could use for measuring essential elements, could include reviewing any existing evidence, as well as holding study groups; members of the public who have a list of cards listing services and options and they can pull together what they think is essential – e.g. 'viewing', 'limousine', 'choice of time and date', 'embalming', 'hearse', 'private ambulance'. With a large enough sample size it should be easy enough to determine what is the public's perception of funeral essentials.

1 (b) How any quality differentials between funeral directors and between crematoria are taken into account by customers in their choice of funeral directors and/or crematoria and the extent to which investments in quality explain price differentials between suppliers.

Many Down to Earth clients can only assess quality differentials to a certain extent, depending on what is within their budget, and it can be very difficult to know what the quality of the funeral will actually be like on the day anyway, as well as other factors, such as whether the deceased is dressed in their own clothes (example 117). Many are arranging a funeral for the first time, so it is nigh on impossible to know what quality and value looks like. What quality differentials they can assess very easily is how they are treated as a human, and how helpful the funeral director is in their initial conversations (example 3, 4, 20, 36, 38). Shockingly, as can be seen from the examples, a good number of funeral directors can be rude and abrupt with clients at a time of great need.

Some customers won't so much assess quality as much as finding a funeral director who is easy to get to in order to make arrangements, and offers a funeral at a date and time that is convenient (example 14, 18).

From assessing our clients' feedback of the quality of the funeral and level of service they receive, it appears that cost is no indicator of quality; we have had good feedback from inexpensive funerals and poor feedback from expensive funerals (example 37, 70, 130), as well as vice versa (example 39).

1 (c) The extent to which the vulnerability of customers at the point of need impedes their ability to engage with the process and make informed choices at all stages in the funeral arrangement process, and what practical aspects of this process have the most significant impact on customers' ability to make informed choices.

Any customer arranging a funeral while in a process of grieving is inherently vulnerable (example 73, 82) and some won't be in the right state of mind to have the critical awareness that a funeral director is selling a commercial product (example 50), particularly when funeral directors including the large companies have 'care' within their descriptions (i.e. Dignity Caring Funeral Services, and Co-op Funeral Care). In addition to this, there are some factors that make some customers particularly vulnerable. Those arranging a funeral for the first time are vulnerable as they have not been through the process before and therefore do not know what to expect; they have to put a certain amount of trust in a funeral director, which can sometimes be abused by funeral directors upselling, 'taking over' or not being transparent from the outset about costs. Having to trust a funeral director can also be the case if someone is vulnerable in other ways too; such as having a disability (learning, mental or physical), literacy issues or not having English as their first language (example 10, 39, 43, 44, 49, 52, 55, 57, 69a, 70, 71, 95, 98). Some clients feel unable to complain about this because the funeral director is known to them or a member of their community, and it is difficult to remain anonymous, or they feel if they make a complaint there will be repercussions, particularly if they are still paying a bill (example 84, 94).

Time can be a pressure factor that leaves customers unable to make informed choices, for example for someone wishing to view the deceased before they die, they may need to be brought into a funeral director's care soon and

possibly embalmed. This will often necessitate the payment of a deposit within a short timeframe and can result in many customers getting into debt (example 53, 88). Down to Earth client Amanda wanted to view and say goodbye to her son who died unexpectedly, so she had not had a chance to say goodbye before then. She ended up having to rush and was panicking about getting the money together before his body deteriorated to the point of not being able to view him anymore. She considered high interest pay day loans in order to facilitate this

<https://www.theguardian.com/society/video/2019/apr/10/4000-in-four-days-one-mothers-battle-to-pay-for-her-sons-funeral-poverty-video>). For some clients, there is an additional time pressure whereby if the funeral director has already collected the body without a deposit, they will charge extra if they money has not been given by the initial funeral date. For those on low incomes, these charges can be an additional burden (example 25, 105)

Unexpected or sudden deaths can leave the bereaved very vulnerable because they have little time to prepare and may feel under pressure to say goodbye in a more lavish way because they have not said goodbye in person (example 42, 56, 59).

For many clients, the thought of leaving their loved one in a mortuary feels unpalatable and they are concerned about 'letting the deceased down' and being seen as though they do not care for them, however, getting enough money together for the funeral director to collect the body can be incredibly challenging. There can often be a perceived societal norm of how long is appropriate to wait for the funeral too, and crossing that time boundary can feel unacceptable (example 6, 8, 113, see also Teresa's story, a Down to Earth client featured on this podcast: <https://iceandfire.co.uk/lifeontheedge/paynowgrievelater>).

Deaths in certain places, such as at home and in care homes, mean that the body must often be collected quickly and customers have to make a quick decision about which funeral director to choose, or the body is moved to a certain funeral director as default because the institution has a contract with the funeral director. This may mean that the charges for 'collection and care' from the funeral director who removed the deceased prohibit the customer 'shopping around' as these additional costs would negate any savings they can make from a less expensive funeral director, and prevent them from accessing a public health funeral as they are seen to have taken responsibility for the funeral (example 9, 72, 75, 103). Many people call the closest funeral director to them to collect them, but they are often the most expensive as it appears they are the ones who can pay for Google search optimisation (example 59, 76).

Changing funeral director once one has been chosen by the individual or institution seems to be rarely done and moving a body from place to place seems at odds with the customer's final aim of putting their loved one 'to rest'. There is also an inherent awkwardness about choosing to move from one funeral director to another, particularly if the costs of moving aren't explicit and the customer has to ask and reveal they are concerned about money (talking about death and money are still British taboos) (example 48, 51, 62, 103). We have seen examples where this is the case, even when the funeral director has been abusive.

Other vulnerability factors can include double bereavements, which can leave someone vulnerable emotionally but also financially if they have to pay for both and they may not make well-informed budgetary choices (example 41, 107, 114).

1 (d) How different circumstances, including social, economic, faith-related and cultural, may have an impact on the options available to customers and on their ability to make informed choices.

There are a number of factors that can impact upon the options available to customers. Being on a low income and therefore a small budget can certainly limit the options available to customers, and the reality is that they often compromise on certain aspects of the funeral, including having a service (example 2, 4).

There can sometimes be a poverty premium added and those known to have restricted means are sometimes asked to pay a deposit all upfront when their more affluent counterparts are not, though this is not always consistent, and funeral directors appear to often make a judgement call on whether they will receive their money after the funeral (example 60, 61, 62, 67). Customers on low incomes have a tougher time as already mentioned making the difficult decision of whether to wait a long time to get the deposit together, or get into debt (example 8, 34, 45) but we have evidence of some funeral directors refusing to engage with those claiming the Social Fund Funeral payment (example 77).

Some of the lower cost funeral packages require all of the money upfront, often within a very short timeframe, while more expensive ones often do not (example 74, 128). This can sometimes leave customers with the uncomfortable choice of whether to choose a lower cost option overall, but pay it within a short timeframe, or take on a more expensive funeral, but pay less initially and more over the course of time (example 75a). Additionally some funeral directors appear to be less kind to clients who are in financial need and opting less expensive options (example 81, 92) and their systems do not appear to be well set up for them, such as one of the larger chains only accepting card payment for their affordable range, which does not allow for customers to get the DWP or a charity to pay by BACS or cheque, meaning they either have to find the money themselves or find another funeral (example 20). Those who cannot find the money and may be unprepared to get into debt or have limited credit options available to them are often penalised by the funeral director threatening to dispose of the body in a way they do not want (example 48, 56), which adds additional pressure at a difficult time and affects the dignity of the customer. They may also add costs for 'storage' of the body beyond a certain time. There are of course possible implications to the funeral director not being able to keep another body there, but the costs often seem higher than necessary (example 63). Such storage costs can also prevent a customer from opting to change funeral directors by being prohibitively high (example 72, 76), as can a funeral director taking a long time to refund a deposit if someone has changed their mind (example 96, 112).

We have discussed already that some customers choose direct cremations purely for economic reasons. As well as not being able to 'say goodbye' within a service, there can be other problems connected with direct cremations. Some direct cremation providers will not disclose the date of the funeral to their customers even if this is wanted (example 27).

Additionally, the lower cost simple packages often have restrictions such as on if the whole deposit is required beforehand, whether the deceased can be dressed in their own clothes, whether there is a choice of time or date, how long the deceased can be kept in the funeral director's care (example 45, 46, 51, 63, 130, 131), whereas the more traditional and expensive options do not have such restrictions, so there are more choices available to those with the means.

For those clients opting for burials, often for religious or cultural reasons, as well as the expense of a burial over cremation (example 43) this can cause additional expense as cemeteries often do not start burials until 10am or

11am, but many simple funeral package options will restrict the time to before 10am, so someone has to opt for a more expensive funeral package or rely on a funeral director to make an exception, which might only be possible through an intermediary such as Down to Earth (example 13, 21). Certain religious groups also require a funeral to

take place quickly and this can cause additional time pressures to the ones already mentioned earlier in this response (example 26, 84), which may mean realistically they can only choose one provider as they don't have the luxury of time to compare costs.

Customers on lower incomes may not be able to pay the remaining bill within the prescribed amount of time (often 28 days after the funeral) as they may be making Social Fund Funeral payment or charitable application claims. This means they are at the mercy of the funeral director to be flexible about this, or allow a payment plan, though this is unfortunately rarely discussed openly before the funeral. Particularly of note is that interest may be added to a payment plan and it is unusual for this to be discussed with clients or professionals or listed online or openly, even with the larger chains (example 1, 53, 54, 68, 69a, 73, 80, 83, 84, 88, 95, 101, 115, 119, 120, 122). Unfortunately adding interest and extra charges does not always act as an 'incentive' for those on low incomes to pay, but just keeps them in debt, and in poverty for longer. Legal action or bailiffs may also be threatened, though again it is difficult to find any evidence of this online and members of the larger chains seem reluctant to discuss if and when they would pass on a debt or pursue legal action to the point of being secretive (example 65, 132, 102, 92, 106, 120, 124).

In addition to or instead of adding interest, those who cannot pay within good time may have the cremated ashes withheld from them to 'encourage' them to pay (example 29, 52, 58, 116). As bodies and ashes are not legal property, we understand this to be bad practice at best, illegal at worst (https://pure.qub.ac.uk/portal/files/137094490/Funeral_arrangements_and_feuding_families_Pharos_Intl_.pdf pp 9-11), and can leave customers in emotional turmoil about 'leaving' their loved one's remains somewhere.

For those with paid or partially paid funeral plans already, they are restricted to the funeral director who the plan is with. This can sometimes mean there is a shortfall but they are not able to choose an alternate funeral director (example 5, 92).

As discussed in the last example, the circumstances of death, such as where the person died, can often restrict someone's options with regard to which funeral director they can use and how fast they need to make such an informed choice (example 9, 33, 62, 75, 76, 86, 90, 103, 113, 126, 128), and arranging a funeral for the first time, or first time in the UK can impact on how able someone is to make informed choices, due to lack of experience (example 10, 43).

The size or weight of the deceased can increase the cost of a funeral if a larger coffin or specialist crematorium needs to be used, though there seems to be a lack of consistency; some funeral directors will charge extra while others will not (example 17, 36).

There are sometimes social norms that mean people spend more than within their budget, such as if it is traditional to purchase flowers spelling words out (example 31) or traditional to have a casket rather than a coffin (example 42). A number of clients expressing that they found it difficult to hold a DIY funeral as the society is 'geared up' to using a funeral director (example 81, 85).

Pressure to respect the wishes of the dead can also be a strong decision making factor. This can be difficult if the deceased had wishes about their funeral that translate into costly options (example 14, 59).

1 (e) The nature and extent of competition between funeral directors, including how prices and behaviours differ between small and large providers.

The capacity of smaller providers of funerals to compete with larger providers of funerals is somewhat limited; certain providers are trusted as a household name (example 47) and many have so many branches, that there will likely be one nearby, which is convenient for arranging the funeral (example 14, 73, 75, 110, 128). Larger companies

can arguably pay more for Google optimisation so when someone is searching for a funeral director either at short notice or in a bereaved state, their results come up faster, and they can invest into well produced websites that give a good first impression (example 59, 76), as well as having the staffing capacity to collect at any time (example 94). We believe that certain care homes, nursing homes and hospitals have contracts, or informal arrangements with certain funeral directors, and that this appears to happen more with larger providers, which means the deceased are taken there as a 'default' option or the funeral director is recommended by the trusted institution (example 9, 33, 51, 79). Customers can of course choose to change funeral directors later, but as previously evidenced, for social and financial reasons this is not easy.

It would be a sweeping statement to say that small providers are always cheaper than larger providers, as this is simply not the case, however certain smaller funeral providers do seem to provide options that are less expensive than their larger counterparts (example 130). Larger providers can offer 'simple' options that get customers through the door, but their restrictions on date, time, viewing and the amount of money needed at short notice can push people to choose a more expensive option. Their traditional options tend to be significantly more expensive (example 5, 21, 41, 46, 47, 51, 61, 63, 76, 78, 82, 84, 86, 87, 91, 94, 96, 97, 98, 103, 110, 114, 115, 121, 124, 127, 130, 131). Larger companies seem to use their economies of scale to be able to offer certain services, such as direct cremations at around £1000-£1,200, which tends to be much less expensive than most high street smaller funeral directors (example 66), so it is a shame they do not do the same with their more traditional packages.

We have found good and bad practice in both small and large providers, as can be seen in the examples. Small providers tend to have more flexibility, while arrangers in larger companies can be kind, but may be restricted with policies and bureaucracies of the larger company (example 17, 112).

1 (f) The funeral sales process, including how and when in the process prices are provided to customers and any other aspects of the sales process that may affect customers' ability to make the best choices.

The funeral sales process, as evidenced throughout the examples, can vary greatly even within the same organisation, and prices being given to customers at different points in the process and payment being requested at different points (example 107).

Of great concern to us is when a body is collected at short notice by a funeral director, such as when they have died at home, and no conversation is had about money at that stage as it can be very difficult to move funeral directors once the body is with them. Of course such a conversation would need to be handled with great care, but we have evidence that customers often request this information, only to be told not to worry or that it will be discussed later (example 49, 57, 75, 90, 126).

When a customer goes into a branch, a conversation does not necessarily happen then (example 5), which may mean the customer chooses options they cannot afford. Even if a rough conversation is had, certain details such as additional charges are not always mentioned either verbally or online, such as 'storage' or doctor's fees (example 25, 32, 118). Often a funeral director will have no conversation with the client about what their budget is or whether they can pay (example 42, 44, 94). Some customers are only given the cost verbally at this stage, and not given a breakdown of costs in a written invoice, which means they have to rely on memory, which may be affected during bereavement (example 16) and it can also leave the customer vulnerable to the funeral director changing their mind or going back on their word (example 22, 27, 48, 67). This can also affect their ability to put in a Social Fund Funeral payment or charitable application in a timely manner because each will want a proper written invoice so that they can consider the application. We have evidence of some customers not even being given a written bill after the funeral, which has the same implications but can also mean they may have debt of an unknown size which is difficult to plan for (example 12, 69). When customers are given a funeral bill, there can be much variety in how much the bill is broken down, which makes it difficult to compare quotes, and catch-all terms like 'funeral services' can make it hard to know what is included on the bill (example 24, 40, 68, 111).

The funeral sales process can sometimes be at odds with other systems a customer is trying to navigate, such as the DWP or charities, and certain systemic issues, such as not being able to give a funeral date before the bill or deposit is paid can prevent someone being able to apply for a payment (The DWP require a funeral date before they will consider someone's claim for the Social Fund Funeral Payment) (example 20, 45).

We have evidence of upselling happening within the sales process, such as a customer being offered a more expensive option than the one they requested (example 11, 32, 38, 42, 47, 55, 64, 97, 124).

It appears there is great variation of when someone is allowed flexibility with paying within a certain timeframe and when a debt is pursued, even within the same large funeral director, and a customer not knowing whether they will be able to pay off their debt in instalments after the funeral or if they will be pursued by debt collectors makes it impossible to make an informed choice on whether to take on such a debt (example 1, 53, 69a, 73, 80, 83, 84, 88, 95, 122, 65, 132, 102, 92, 106, 120, 124). It can sometimes be unclear to a customer how long they actually have to pay off the debt (example 108, 125).

Occasionally, funeral directors will do something unrequested during the sales process, such as passing a client's details onto others or not allowing their customer a choice of crematorium (example 37, 39, 109).

Of particular concern is a large chain of funeral directors being deliberately misleading about price and telling customers they won't get a funeral cheaper elsewhere, when they will (example 70, 76) or funeral directors adding costs onto a bill later (example 71, 84, 99, 123) or engaging in fraudulent activity (example 104).

Another worrying aspect of some funeral processes is funeral directors giving incorrect advice about claiming the Social Fund Funeral Payment, which can cause customers to make less well-informed choices than if they had been given correct advice (example 83, 89, 100, 106, 113).

1 g) The profitability of both large and small funeral directors, and the extent to which cost increases and/or investments in quality improvements explain the increases in funeral prices that have been reported.

As previously mentioned, from the evidence we have seen, cost appears to be no clear marker of quality. There are funeral directors who charge very reasonably and we suspect don't make huge profits, but to be continuing to run, must still be profitable. We have had feedback from clients from very low cost providers who perceived the quality of service they received as very high, so it can be difficult to comprehend how those companies who have driven up their prices claim to have made improvements that justify those rises. Indeed, some small providers feel they can take the risk of clients paying nothing before the funeral takes place, and yet companies who hike their prices high, do not appear to be investing their profits in this risk as they will consistently require a deposit when perhaps they could use their capital to help those who are less able to get a deposit together in good time (example 19, 28, 36, 47, 74).

Potential remedies

1 (a) To improve the preparedness of customers ahead of the point at which the funeral needs to be organised by encouraging people to consider funeral arrangements at times when the situation lends itself to such considerations before the point of need.

Quaker Social Action believes customers need to be helped well ahead of a funeral to understand costs involved, how to arrange a funeral and the different options available. We think it would be good if a guide could be produced that helps people understand what is *necessary* to do, what they are *advised* to do and what they may *wish* to do. Given that many of us will fortunately organise very few funerals in our lifetimes, it can be difficult to know what to do when the time comes. This information should be online on the gov.uk and Money and Pension Service site and could take the form of a simple video or set of infographics for those less literate, but should also be a printed booklet as an independent and simple to understand guide, free from any marketing from the funeral industry. This

booklet should be available in every funeral director's office but also in other places where people could be expected to seek information about organising a funeral; GP surgeries, registry offices, care homes, hospitals, hospices and Citizens Advice. Such a guide should be independent and not written by the industry. The guide could also be advertised on TV to raise awareness of its availability. As certain groups are particularly vulnerable, such as certain religious groups where speed is key, perhaps guides could also be specifically targeted at them. The more prepared customers are before a funeral, the better they can think through decisions when the time comes.

However, customers do not navigate the funeral process in isolation; they may also need to consider *how* they will pay for the funeral in order to work out what their budget may be; this is particularly the case from those from lower socio-economic groups, who we have identified as particularly vulnerable. Information in the guide should not only explain how to navigate the funeral but also how to navigate the DWP's processes, for the Social Fund Funeral Payment and Bereavement Support Payment, what a public health funeral is and when and how one may be accessed, and ways of finding grant-giving charities who can help. Down to Earth have a guide that could be used as a starting point, but ideally the Competition and Markets Authority would work together with the DWP and Local Government Association to ensure consistent and accurate information on all the processes someone might expect to navigate.

As we evidenced earlier, customers often take the wishes of the deceased into account, so perhaps there could be a guide for people who are making their funeral wishes, so they can make sensible decisions that will not leave their families in debt.

However, as many of the examples we have given refer to sudden or unexpected deaths, remedies to prepare customers only go so far and the onus should be mainly on changes within the industry.

1 (b) To make it easier for customers to make the best choices, for example by ensuring that the information provided by suppliers enables like-for-like comparisons of prices and services offered.

We believe there are additional transparency measures that should be considered beyond online pricing and informative guides. As referenced in the interim report, people often do not shop around and may not visit a funeral director's website at all. The funeral arrangements tend to be made face to face and over the telephone therefore the critical interaction is not between the customer and the funeral director's website/printed materials, but in the verbal discussions that follow. The CMA might choose to mystery shop to see what information is taking place during these initial discussions.

Currently some funeral directors' outline of fees will include everything in one price, including disbursements, while others break down the elements. Some funeral directors will mention 'funeral director's costs' as one fee with no breakdown of what this includes, whereas other funeral directors will itemise every element of their costs (coffin, hearse, paperwork), so it can be hard for customers, and indeed advisers at Down to Earth who do this every day, to compare exactly what is covered in one price versus another. Examples have been listed in the issues section and include 24, 40.

Instead, we would support like for like quotes and invoices using a standardised format which breaks down clearly which elements are essential, which optional and which costs are third party. They should be easy to read for those with additional needs, with a standard glossary of terms to explain terms so that customers do not feel bamboozled by terms they do not understand, such as embalming, and ashamed to ask. Alongside the invoice, there should also be a reference to average funeral costs (Royal London and Sun Life each produce research on this each year) so that customer can compare how much higher or lower their bill is as people generally do not know how much a funeral costs.

Prices should be given verbally and a written quote, then final invoice on official headed paper. A conversation about costs should happen from the outset, and anything given verbally written down too. This would prevent funeral directors changing things as easily without a proper discussion with customers and can also help people to then navigate the DWP and charities' systems.

Methodology the CMA could employ could involve requesting to view records of original quotes and final bills at different funeral directors to see how much they change and for what reason, and to see which bill is clearest to use as a final template.

As part of the transparency of prices, consumers should also be able to see at a glance how much a funeral director will charge for the services they may need them to carry out before deciding on the full funeral costs; collecting the deceased, with transparency on the distinction between the in-office hours cost and the out of office hours cost.

There should also be transparency on how much it would cost to transfer to another funeral director, sometimes calculated as the cost of 'storage'. This should be available online and in a printed pricelist handed to the client upon collection of the deceased. We have evidenced that there is a currently lack of information available to customers on these costs, particularly at the time of collection. This pricelist document should also make clear which area a funeral director will cover and how much they will charge when going 'out of area'.

Terms of business, including the size of deposit, how long someone has to pay after the funeral and payment options after the funeral should also be transparent; they should be discussed and written terms given from the outset so that it is not subject to funeral directors' judgements on an individual's ability to pay. It is essential that consumers understand not just how much they will need to pay overall, but how much deposit they need to pay and by when, when the balance needs to be paid and what options they have for paying it, i.e. can they pay in instalments and if so will interest be added to this. Any charges that might be added should also be made clear. We have evidenced how this detrimentally affects the most financially vulnerable when it is not clear. The lack of clarity on payment options can be enormously stressful for clients, and can even drive some to think about suicide (example 73). If terms are clear from the outset it may help customers avoid unmanageable debt. Debt collection procedures, including passing on a debt to a collection agency, or when legal action would be taken should also be made transparent from the outset. There should also be regulation on what wording funeral directors can use (verbally and written) about this to prevent them from simply frightening clients into paying.

Funeral directors should also receive some basic training on the DWP's processes, particularly the Social Fund Funeral Payment, and on public health funerals. This would mean they are able to advise clients well, who in turn could make informed choices about their funeral budget.

In terms of services offered, funeral directors should be able to work alongside the DWP's processes; so they should provide a date for the funeral and a final invoice before the funeral takes place, so that customers can make an application for the Social Fund Funeral Payment for the deposit ahead of the funeral if required. Funeral directors should all also be accessible to those on low incomes by allowing the DWP and charities to make payment, rather than restricting payments to card payments as we have seen.

2 a) Pricing/charging remedies. Such remedies would seek to limit the ability for funeral directors and/or crematoria operators to set prices significantly above the costs of providing their services. At this stage, recognising the challenges of implementing such remedies in a fragmented market, we consider that a number of options are open to us.

We are very supportive of constraining the prices of funerals; we believe price caps should be implemented on the essential elements of a funeral and on crematorium fees but also on add-ons that are seen as normal within most societal norms, such as viewing, embalming and limousines. To protect the financially vulnerable it is important that

there is a cap on the interest that can be charged if a consumer needs to pay in instalments, and on fees that can be added, including admin fees and storage. Our concern on price caps would be that more funeral directors would then require all of the bill paid before the funeral happens, which we already see as an issue for those on the lowest incomes and have evidenced in the examples within the issues section. Ideally then, we would also like to see a cap on how much deposit a funeral director can request so those in the lowest economic groups are not disadvantaged. This could be the disbursements plus a percentage of the funeral director's fees or disbursements plus a given

amount, whichever is higher. We would also like to see all customers being given the option to pay the rest of the bill in instalments and for this to be clear from the outset.

(b) Remedies to regulate the levels of service quality provided by funeral directors and crematoria operators, for example in relation to aspects of [issues summary]; quality that customers are likely to find particularly difficult to engage with (e.g. standards of care of the deceased). Such remedies would also address any incentives to diminish product and service quality levels that could arise if prices were to be regulated.

In terms of standards of care of the deceased, a decision on what standard of care is acceptable needs to be reached; we would argue that this should just be hygienic and avoid the decay of body where possible. We would hope that there would be a balance between ensuring reasonable standards were adhered to, while ensuring the standards were not impossibly high to deter funeral directors with a lower budget to continue operating.

Funeral directors should be clear on when the body will be collected, and where it will be kept. There should be clear choices on embalming or not and a clear explanation of what this is and what it involves. We believe customers find this hard to engage with because they don't know what it involves.

However, quality is not just limited to the care of the deceased. We believe the care given to those still alive is even more important and many of the examples we provided include our clients expressing how important it is to receive good customer service and be treated kindly and with compassion. There should be a minimum level of customer service and a code of conduct perhaps that all funeral directors need to follow. All funeral directors should have access to basic low cost or free online training on essential aspects such as customer service and data protection.

Customers should be able to easily complain to an independent authority if this code of conduct is breached. We have already evidenced how existing complaints systems are not robust and are certainly not independent. There should be robust penalties for those funeral directors who mislead, misadvise and commit fraud. There should also be a ban on funeral directors withholding ashes until the full bill has been paid.

Quality should also relate to the funeral service itself; to avoid discriminating against those on low incomes, all funerals must allow a choice of date and time and must allow people a reasonable amount of time to pay; 48 hours as cited in one example is not a reasonable timeframe for someone on a low income to find thousands of pounds.

2 (c) Market opening remedies. These types of remedies are used to lower barriers to entry

We strongly support the idea of 'unbundling' packages as we have evidenced the difficult people face when going from a 'simple' package to a 'traditional' package when they only want one element of the traditional package, such as a funeral on a specific date, but have to pay thousands more for the privilege.

We also support customers being able to source elements from different places; such as their own coffin, or transport, and package a funeral together that suits their needs much more and avoids them paying for elements they don't want or need. It is important that barriers to entry are removed as far as possible to increase competition.

To increase competition, there could be a central resource where all registered funeral directors can include their contact information and website, so that there is less reliance on Google optimisation. If a guide to help customers prepare was produced, a link to this website could be included within that.

3. It may also be necessary, depending on the package of remedies that is required to address any AECs that we find, to introduce reforms to the regulation of the sector. If we require the introduction of pricing/charging remedies and/or remedies to regulate the levels of service quality, it is likely that the effectiveness of these remedies will be enhanced by the introduction of new, or amendment to existing, regulatory regimes, potentially supplemented with a licensing scheme.

QSA would also support funeral directors having to be licensed, though we are concerned that if there is a cost for licensing, funeral directors may pass this cost onto their customers, which would possibly raise funeral costs rather than lowering them. We are also concerned in case a high cost deters new funeral directors from entering the market, and therefore dampens competition further. We trust that a sensible approach to costing licenses would be taken, perhaps linking the cost to the size or profit of the business, so that smaller businesses pay less than larger ones.

In terms of regulating the sector, we believe an independent complaints body would be key, and other measures might include funeral directors who have previously been engaged in poor practice, not being allowed to practice again as they can currently (example 23).