

Funerals Market Investigation

Crematoria: outcomes

30 January 2020

This is one of a series of consultative working papers which will be published during the course of the investigation. This paper should be read alongside the [Issues Statement](#) published on 8 April 2019 and other working papers published.

These papers do not form the inquiry group's provisional decision report. The group is carrying forward its information-gathering and analysis work and will proceed to prepare its provisional decision report, which is currently scheduled for publication in April/May 2020, taking into consideration responses to the consultation on the Issues Statement and responses to the working papers as well as other submissions made to us.

Parties wishing to comment on this paper should send their comments to Funerals@cma.gov.uk by 27 February 2020.

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The Competition and Markets Authority has excluded from this published version of the working paper information which the inquiry group considers should be excluded having regard to the three considerations set out in section 244 of the Enterprise Act 2002 (specified information: considerations relevant to disclosure). The omissions are indicated by [✂]. Some numbers have been replaced by a range. These are shown in square brackets. Non-sensitive wording is also indicated in square brackets.

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Executive summary

1. This paper presents evidence and analysis relating to:
 - (a) How fees have changed over time across different providers, and how fees vary between providers;
 - (b) the extent to which there is any correlation between concentration and fees/margins; and,
 - (c) quality outcomes, in particular, the extent to which there is any correlation between the presence of a rival and certain measures of quality, the extent to which there is any correlation between fees and certain measures of quality, and the extent to which private crematoria are characterised by higher quality measures compared to local authority crematoria.
2. The key highlights for each of these points is as follows.

Cremation fees

3. Average standard cremation fees have increased across all providers in the period 2008-2018. Standard cremation fees have also increased (over the period 2014-2018) on a per-minute basis.
4. On average, fees at crematoria with alternatives within 30 minutes tend to be lower than fees at crematoria without alternatives. For crematoria who have at least one rival within 30 minutes, differences in average fees depending on whether the closest rival is located relatively close or further away are often small, as are differences in average fees depending on the number of rivals located within 30 minutes. For example, average local authority fees when the closest rival is located 20-30 minutes away are £712, falling slightly to £691 when the closest rival is closer (10-20 minutes away). Private providers with two rivals within 30 minutes charge, on average £788, and this falls by less than £10 to £784 when there are three or more rivals within 30 minutes. Furthermore, while fees at private crematoria are materially lower on average when their closest rival is less than 10 minutes away (an average fee of £668 compared with average fees of over £825 when the closest rival is further away), there are very few instances of crematoria being located very close to one another (ie within 10-minutes).

Crematoria margins

5. EBITDA margins are not clearly correlated with the drive-time to the closest rival, but, on average, EBITDA margins slightly decrease with the number of

rivals within a 30-minute drive time. Crematoria with more rivals charge, on average, lower fees, and conduct fewer cremations (and thus are likely to face higher average costs), with both factors likely explaining the lower margins that these crematoria earn.

Quality outcomes

6. We have found that on some measurable aspects of quality (for example, slot lengths and availability of certain facilities, eg visual tributes) private crematoria, are, on average, higher quality compared with local authority crematoria. We also note that, based on the same metrics, newer crematoria (which are mainly private crematoria), are, on average, higher quality compared with older crematoria.
7. Qualitative measures of quality, including reports from the Scottish Inspector of Crematoria, customer satisfaction surveys, and interviews with crematoria and independent funeral directors do not provide clear cut evidence that there are quality differentials between crematoria depending on whether the crematoria are operated by private providers or local authorities.
8. Our analysis, based on some measurable aspects of quality, has not found evidence that more expensive crematoria consistently offer a higher quality services compared with cheaper crematoria, nor that quality varies depending on whether the crematorium faces a rival within 30 minutes or not.

Analysis of cremation fees

9. In this paper we describe fees for different types of service: standard fee, reduced fee and unattended fee. Standard fee services are those services charged at the full fee, normally during peak hours. Reduced fee services are services held in off-peak hours (eg 9am or 9.30am services). Unattended fee services are cremations without a service (also referred to as direct cremations).
10. Our analysis of standard fee services is based on data from the Cremation Society. The Cremation Society gathers information on fees from all crematoria in the UK. The standard fee as reported by the Cremation Society is the most comparable fee across crematoria, as it includes all the essential services necessary for a cremation, including medical referee fees, environmental surcharges, and a chapel slot. In some circumstances, particular crematoria charge extra for certain services (for example, an

organist, webcasting the service or a weekend surcharge), and this additional cost is not reflected in the standard cremation fee.¹

11. Dignity told us that its fees contain all the essential elements of a cremation service, whilst other operators may not.² Dignity identifies these essential elements as being environmental charges and medical referee fees (which, as noted above, are included in the Cremation Society figures), as well as the provision of other common charges such as music and a container for the ashes (if removed from the crematorium) or the strewing of ashes (if not removed) (which are not included in the Cremation Society figures). The number of crematoria that charge an additional fee for use of the music system is very small - we understand six crematoria³ charge between [£] for this. In total, 25 crematoria⁴ charge for a container for removing ashes (with charges ranging from [£], and the average charge being [£]).
12. Dignity has conducted market research of crematoria in the UK (the 'Trajectory market research') and provided the CMA with analysis showing that it found that the fees charged by crematoria in its research are generally higher than the fees reported by the Cremation Society. Dignity "recommends the CMA does not rely on this data to assess whether providers offer good value for money to consumers," noting that in some instances the cremation fee quoted could be that of a non-standard cremation service (for example, a reduced fee service). We have compared the cremation fees in Trajectory's market research with the Cremation Society standard fee that we have used in our analysis. We note that in many instances the Cremation Society standard fee that we have used in our analysis is lower, though often not materially, than the fees that Dignity gathered during the Trajectory market research. Where fees were higher under the Trajectory market research (186 instances out of 288), on average, these fees were 10% more expensive than that quoted by the Cremation Society. However, in the instances where the fee quoted by the Trajectory market research is lower than the Cremation Society standard fee (27 instances out of 288), on average, these fees were 13% less expensive than that quoted by the Cremation Society. As such, we found that across all fees, the fees provided by the Trajectory market research are 5% more expensive than fees quoted by the Cremation Society.⁵

¹ [CMA Funerals Market Study: Final Report, Appendix E.](#)

² [Dignity response to Issues Statement](#), paragraph 3.12iii.

³ Where this number is derived from the Dignity Trajectory market research, giving data on 291 crematoria in the UK.

⁴ Where this number is derived from the Dignity Trajectory market research, giving data on 264 crematoria in the UK.

⁵ Dignity has cited three examples of where fees gathered in the Trajectory market research differ from the Cremation Society fee. In two of the examples provided by Dignity, it was not clear whether the difference

13. We note that, in some instances, when we compare private and local authority fees for standard fee services, the local authority fee may be an underestimate (where the Trajectory market research is more accurate). However, given the reasons set out in paragraphs 10 and 12, and because the Cremation Society data is available over historic time periods, we have used this data as the basis of the following analysis.⁶

Standard fees over time

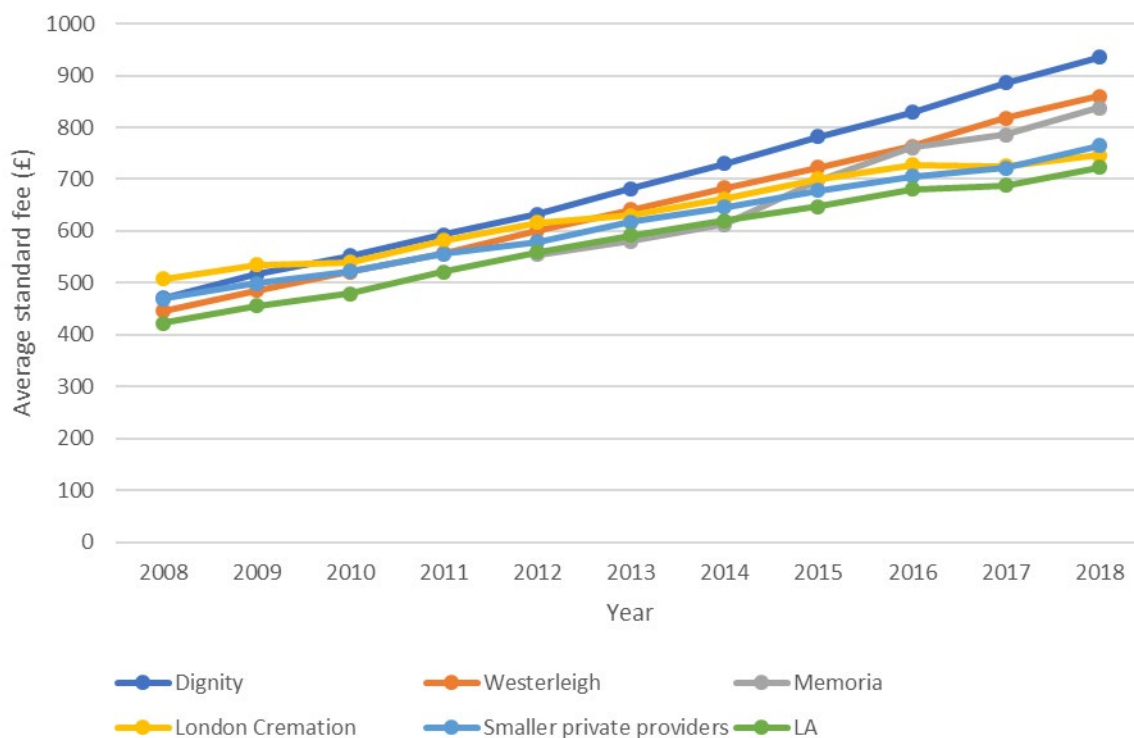
14. Figure 1 shows the trend in the average standard fee,⁷ by type of crematoria operator, between 2008 and 2018.

between the Cremation Society fee and the Trajectory fee and/or the current fee quoted on the local authority website was due to subsequent fee increases or the wrong fee being quoted to the Cremation Society and/or Trajectory. In one instance (The City of London Cemetery and Crematorium) it seems clearer that the fee quoted by the Cremation Society is an early morning fee and not the standard fee, with a large differential between the two. In our analysis of 2018 fees we have used a corrected fee for this crematorium (but do not have data for previous years to allow us to make such a correction, meaning that average fees for the years 2008-2017 are likely to be a slight underestimate). In our entry analysis (see working paper Crematoria: evidence on competition between crematoria), we have used the fee as quoted by the Cremation Society for all years given that this analysis looks at relative changes in fees.

⁶ We have conducted some of the analysis described in this paper (which was conducted using Cremation Society data) using the Trajectory market research data set to assess whether the results were materially different depending on the data set used (in particular, the analysis described in paragraph 15 relating to 2018, Figure 8 and Figure 11). We do not consider using an alternative data set gives materially different results/findings. We note that average provider fees are consistently higher across providers using the Trajectory market research data set, with the largest percentage increase in average fees being for local authority crematoria.

⁷ The average standard fee is calculated, for a given provider, across all crematoria open in that year and for which we have data.

Figure 1: average standard fee (£) over time, across all crematoria providers, between 2008 and 2018



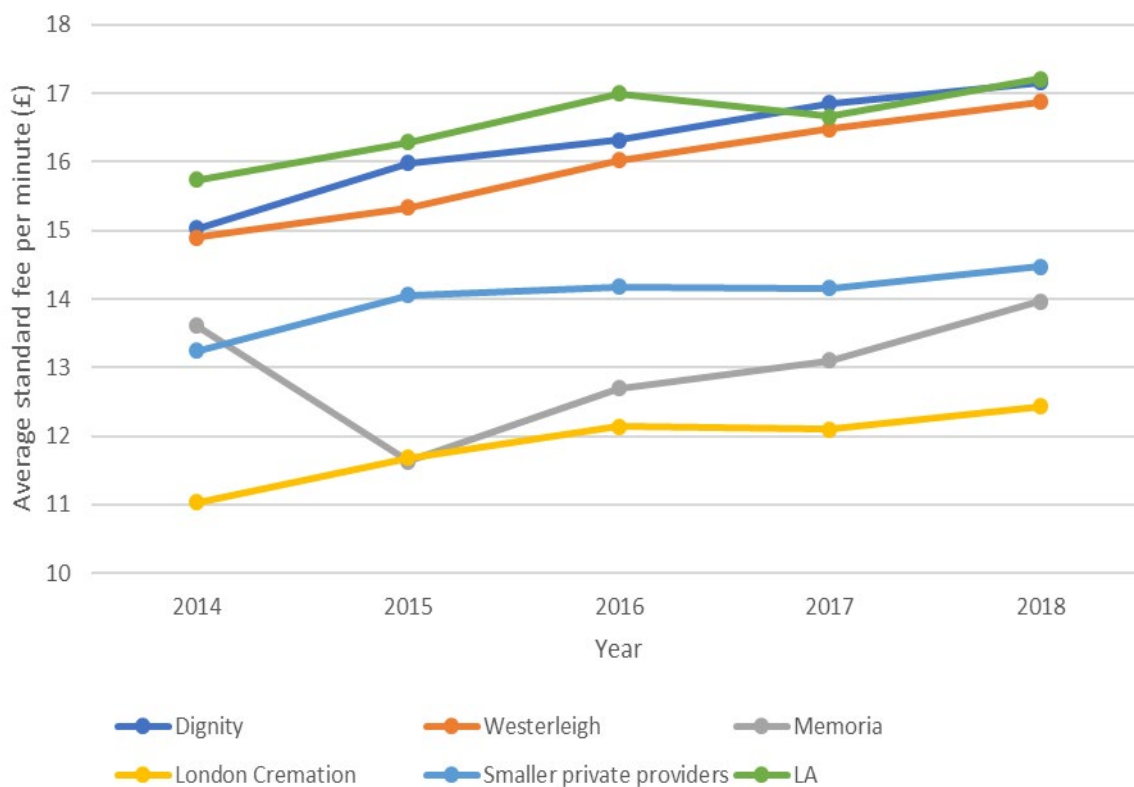
Source: CMA analysis of Cremation Society data.

15. This graph shows:

- (a) Average standard fees have steadily increased across all types of crematoria providers between 2008 and 2018;
- (b) Dignity had an average standard fee of £470 in 2008, increasing to £936 in 2018, an increase of 99% and a compound annual growth rate (CAGR) of 7%;
- (c) Westerleigh had an average standard fee in 2008 of £445, increasing to £860 in 2018, an increase of 93% and a CAGR of 7%;
- (d) Memoria had an average standard fee of £555 in 2012, increasing to £838 in 2018, an increase of 51% and a CAGR of 7%;
- (e) the London Cremation Company had an average standard fee of £507 in 2008, increasing to £746 in 2018, an increase of 47% and a CAGR of 4%;
- (f) smaller private providers had an average standard fee of £469 in 2008, increasing to £765 in 2018, an increase of 63% and a CAGR of 5%; and,
- (g) local authority crematoria had an average standard fee of £422 in 2008, increasing to £723 in 2018, an increase of 71% and a CAGR of 6%.

16. In real terms, average local authority and private cremation fees have increased by 37% and 48%, respectively, between 2008 and 2018.
17. We now move on to see how the average standard fee per minute charged by different providers has changed over time. This price measure is a way to control for potential increases in slot lengths over time that may have affected the total cremation fees charged by certain providers, and it allows us to better understand whether the relative price position of the various providers on a “per-minute” basis has changed over time.

Figure 2: average standard fee per minute (£), across all main providers, between 2014 and 2018



Source: CMA analysis of Cremation Society data and RFI responses. We do not have complete fee and slot length for all providers but have data for at least 60% of each provider’s crematoria that allows us to calculate average fee per minute.

18. Figure 2 shows that Dignity and Westerleigh have an average standard fee per minute which is not materially different to the average standard fee per minute fee of local authority crematoria. Memoria, The London Cremation Company and smaller private providers are priced, on average, lower than other private providers and local authorities on a price per minute basis. Local

authorities have increased their fee per minute by an average of 9% between 2014 and 2018, and private providers by 12% over the same time period.⁸

Use of the fee per minute measure

19. We do not consider the price per minute metric particularly informative of the price competitiveness of the various providers because customers do not have a choice of slot lengths at a given crematorium for a standard fee service (other than by purchasing additional slots or, in some instances, by taking a reduced fee service instead). Customers have to accept the length of time offered to them by the crematorium, and, if they want a longer service, they have to pay for extra time in the increments offered by the crematorium. So, for example, if a customer wants longer than the 30 minutes offered by their crematorium, they have to buy an additional time slot/increment (which is often priced relatively cheaply compared with the initial booking slot).
20. We have considered the extent to which average prices differ, across private and local authority crematoria, for a slot of at least 45 minutes. We consider that a 45-minute slot is an appropriate basis on which to make comparisons given the following representations which have been made to us:
 - (a) Dignity stated that 45 minutes should be the minimum length for a cremation booking slot.⁹ Dignity has told us that: “45 minutes is a good time. Any more than that and it is a more of a bonus, if you like. 45 minutes is ample and what people expect to have time in a chapel.” Dignity has further commented that: “in Dignity’s view a slot length of 45 minutes or more is necessary for most customers... the majority of [our] portfolio [offer] 60 minutes.”
 - (b) Many local authority crematoria have extended their slots, considering 45 minutes an appropriate slot length and they have often done so after consultation with families and funeral directors. For example, Sandwell Valley crematorium stated that “service slots...were increased from 30 minutes to 45 minutes...following feedback from families and funeral directors alike.” Further, Guildford crematorium stated that “as a result of feedback... service times were changed from 30-minute to 45-minute time slots”. In addition, Plymouth City Council told us that a 45-minute slot

⁸ For Dignity, the average nominal increase in fee per minute was 14% and the average real increase in fee per minute was 8%. For Westerleigh the average nominal increase was 13% and the average real increase was 7%. For Memoria the average nominal increase was 3% and the average real increase -3%. For local authority crematoria the average nominal increase was 9% and the average real increase 3%. For the London Cremation Company crematoria the average nominal increase was 13% and the average real increase 6%. For smaller private providers the average nominal increase was 9% and the average real increase was 3%.

⁹ [Cost, Quality, Seclusion and Time](#).

provides “customers/bereaved families the opportunity to personalise the service making use of the facilities available. This allows substantially more time within the chapel for visual tributes and eulogies to be delivered.” Crematoria in Maidstone, Eastbourne, Wolverhampton, Dewsbury Moor, Huddersfield, Weymouth, Gateshead, Portchester, Cardiff, Clydebank, Worcester, South Shields, Manchester, Halifax, Eltham, Sheffield, Newcastle-Upon-Tyne, Great Yarmouth, Falkirk, and Tunbridge Wells made similar comments relating to the benefits and appropriateness of a 45-minute booking slot.

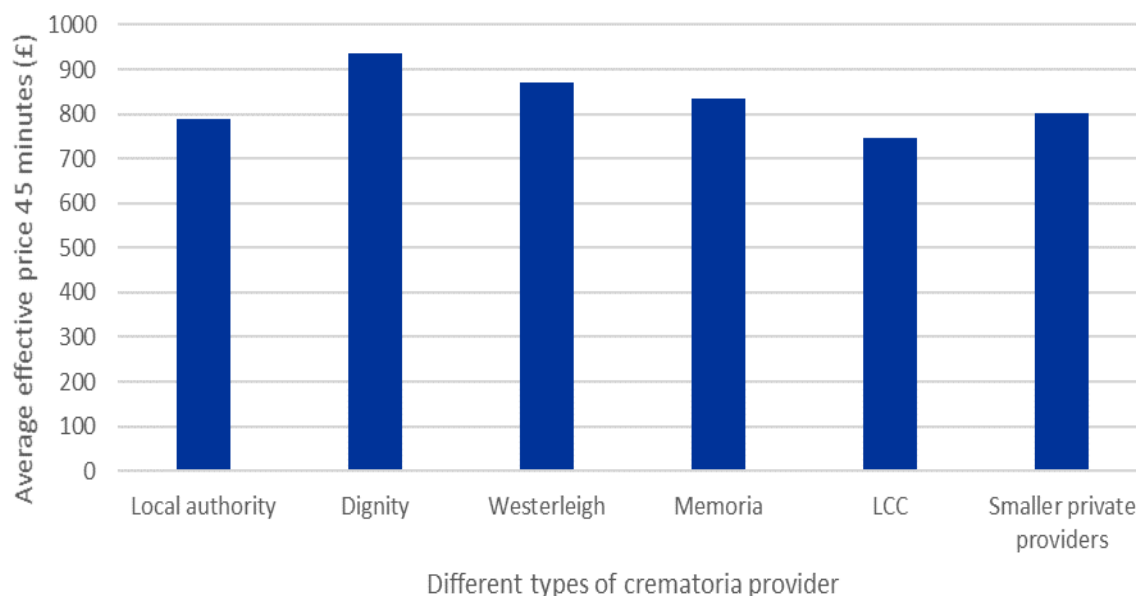
(c) Some independent funeral directors that we have spoken to have also commented that 45 minutes is appropriate for a cremation service.

(d) Finally, we note that the ICCM’s Charter for the Bereaved¹⁰ sets members a target of a minimum slot length of 40 or 45 minutes.

21. We have calculated the price of a slot of at least 45 minutes by using the fee charged for a 45-minute slot or a longer slot (when available), or, where slots of less than 45 minutes are offered, the price of the slot plus the additional incremental charge to achieve a slot length of at least 45 minutes. Figure 3 shows the results of our analysis. The London Cremation Company is the cheapest provider on this measure. Local authorities are cheaper, on average, compared with the other private providers for a 45-minute slot. Dignity is the most expensive private provider for a 45-minute slot, followed by Westerleigh, then Memoria. This is because where local authorities offer shorter, 30-minute slots, they tend to offer increments of additional time/double slots at a relatively low additional price. We consider this an important distinction to a simple comparison of fees on a price per minute basis, given this is what customers will, on average, actually pay for a 45-minute slot.

¹⁰ [Charter for the Bereaved](#), page 47.

Figure 3: average effective price (£) for 45-minute booking slot, across different providers, in 2018



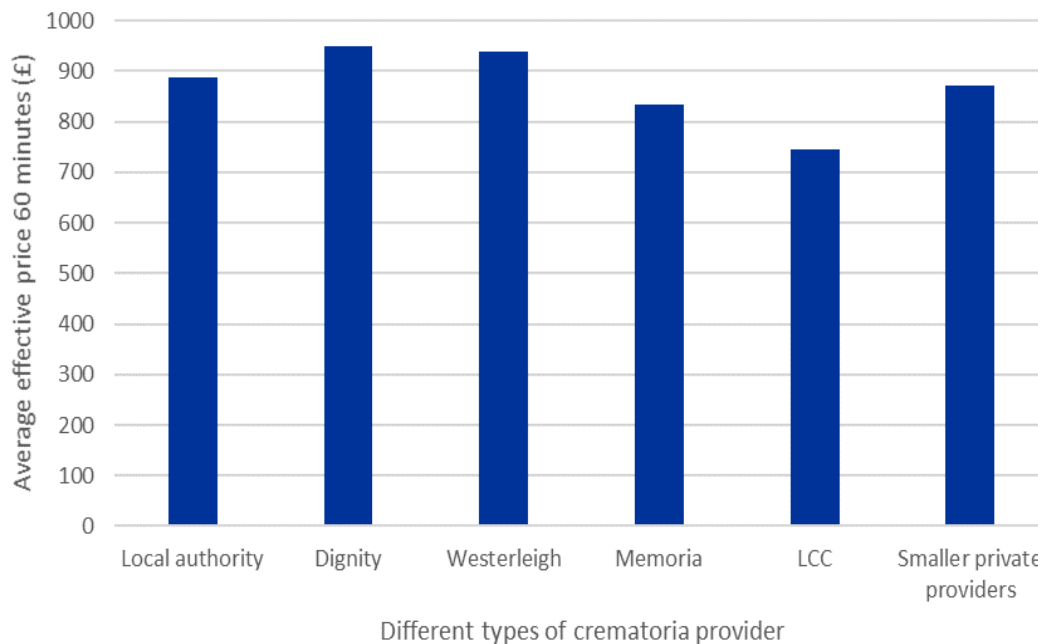
Source: CMA analysis of Cremation Society data and RFI responses from local authorities, Dignity, Westerleigh, Memoria, London Cremation Company and smaller private providers

22. The analysis above is not necessarily comparing like-for-like as it includes crematoria offering 60-minute slots. Furthermore, providers such as Memoria¹¹ and some local authority crematoria¹² have argued/stated that 60-minute slots are appropriate. To address this point, we have also included a comparison of average fees for a 60-minute slot, calculated on the same basis as above. Figure 4 shows that London Cremation Company crematoria are, on average, the cheapest on this measure, with an average fee of £746, whilst local authorities have an average fee of £888. We also note Memoria to be cheaper than local authority crematoria under this measure with an average fee of £833. On average, Dignity and Westerleigh charge £948 and £937 respectively. The differences in average fees are less pronounced when comparing slots on a 60-minute basis (compared to the analysis of average standard cremation fees).

¹¹ Memoria response: “At Memoria, we offer one-hour slots at all of our crematoria. We have done so since January 2015. Before that, we offered 45-minute service times for all services. We made the change to one-hour slots after extensive feedback from funeral directors and bereaved families at our Kirkleatham Memorial Park site. Our decision to switch to one-hour services at all sites was driven by our desire to try and ensure that every bereaved family using our crematoria experienced the facility to themselves and were not given an impression of being part of a ‘tragic conveyor belt’. The extra time between services can make this aim possible. We offer one-hour services for both committal only and full services.”

¹² Kettering, Bracknell, Birtton, Glasgow, Luton, Edinburgh, Truro, Hull, Leicester, Leamington Spa, Cambridge, Chelmsford, Boston, Birkenhead, Medway, Mansfield and Brighton.

Figure 4: average effective price (£) for 60-minute booking slot, across different providers, in 2018



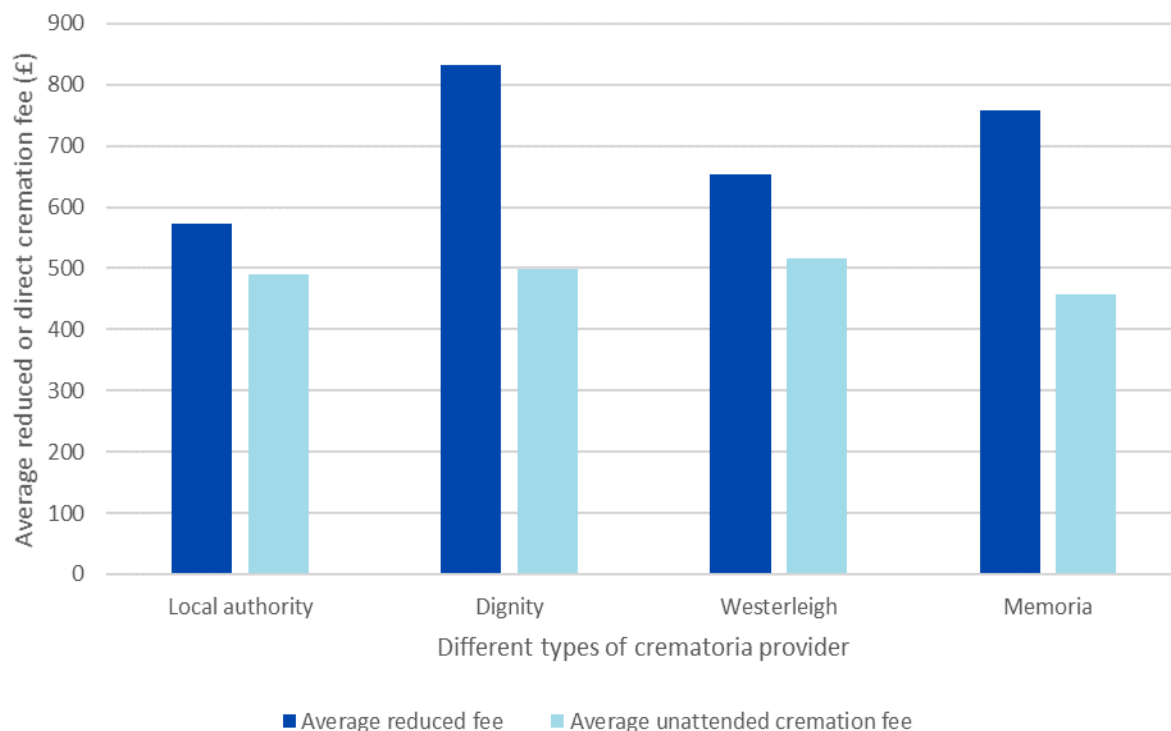
Source: CMA analysis of Cremation Society data and RFI responses from local authorities, Dignity, Westerleigh, Memoria, London Cremation Company and smaller private providers.

Reduced and unattended fees

23. We have assessed average reduced and unattended fees in 2019, split by different providers in Figure 5 below.¹³

¹³ Direct comparisons between different providers for the reduced service fee may be less accurate than direct comparisons of standard fees as we have been unable to gather data that allows us to understand whether medical referee and environmental levies are included in the reduced fee data supplied by different providers (whereas in standard fee data from the Cremation Society we know these charges are included across providers).

Figure 5: average reduced and unattended fee (£) in 2019, split across different types of crematoria provider¹⁴



Source: CMA analysis of RFI responses from local authorities, Dignity, Westerleigh and Memoria. London Cremation Company and smaller private providers are not included here due to data availability.

24. Figure 5 shows that:

- (a) For local authority crematoria,¹⁵ the average reduced and unattended cremation fees are £572 and £489 respectively;
- (b) for Dignity crematoria,¹⁶ the average reduced and unattended cremation fees are £832 and £498 respectively;
- (c) for Westerleigh crematoria,¹⁷ the average reduced and unattended cremation fees are £653 and £516 respectively; and,

¹⁴ Where for reduced fee and unattended cremation fee we have data on 152 and 169 crematoria respectively (out of 272), since we have focused on local authority and main provider crematoria.

¹⁵ Where 75 and 86 local authority crematoria out of 183 provided us with data on reduced fee services and unattended services respectively. The remaining local authority crematoria either do not offer reduced fee or unattended services or have not provided data.

¹⁶ We have based this analysis on data for 37 and 46 Dignity crematoria (out of 46) reduced fees and unattended fees respectively from Dignity price lists. We did not have data for the remaining Dignity crematoria

¹⁷ We have based this analysis on 30 and 27 Westerleigh crematoria (out of 33) reduced fees and unattended fees respectively from Westerleigh price lists. We did not have data for the remaining Westerleigh crematoria.

(d) for Memoria crematoria,¹⁸ the average reduced and unattended cremation fees are £759 and £458 respectively.

25. We note the uniformity of average unattended cremation fees across providers, in contrast to the dispersion observed in average reduced fees and average standard fees. This greater uniformity could be explained by unattended cremation services being characterised by competition over wider geographic areas (given that they can be conducted further away from customers) and being a less differentiated service across providers compared to attended services. Variation in reduced fees and standard fees across provider and across areas suggests that pricing for these services is potentially determined, in part, by the local competitive conditions that a crematorium faces.

Summary

26. Average standard cremation fees have increased across all providers in the period 2008-2018. Standard cremation fees have also increased (over the period 2014-2018) on a per-minute basis.

Cremation fees and local concentration

27. All else being equal, we would expect fees to be higher in more concentrated areas, eg those areas where there are fewer rivals, compared with less concentrated areas. We have considered the extent to which private and local authority crematoria fees vary depending on different measures of local concentration, including, for each crematorium:

(a) Whether or not the crematorium has a competitor within a 30-minute cortege drive time. We consider a 30-minute cortege drive time to be an appropriate cut-off given our analysis of crematoria catchment areas,¹⁹ the CMA's Market Investigation consumer survey,²⁰ the CMA's Market

¹⁸ The CMA has used data from Memoria price lists. The Memoria 'category 2' cremation fee described as: "funeral director, no attendance... delivery by prior arrangement... no service" was used by the CMA for its analysis of unattended cremation fees. The CMA has used the Memoria 'category 5' cremation fee described as: "18 years or over... 8am, 9am, 10am... full or committal" for its analysis of reduced fee services. We have based these averages on direct and reduced fees from price lists for all 10 Memoria crematoria.

¹⁹ The average 80% catchment area across Dignity, Westerleigh, Memoria and a sample of local authority crematoria was 33 minutes at cortege driving speeds.

²⁰ Two-thirds of customers said the deceased lived within 25 minutes of the crematorium, and four-fifths said the deceased lived within 30 minutes of the crematorium. The survey does not allow us to understand whether this was at normal or cortege drive times. CMA Market Investigation consumer survey, Tables 341-343, Question C10.

Study consumer research,²¹ internal documents and commentary from the main private crematoria operators; and planning applications;²²

- (b) whether there are competitor(s) within a 30-minute cortege drive time, and the distance to the nearest competitor from the crematorium (by cortege drive time);
- (c) the identity of this nearest competitor (ie whether this nearest competitor is private or local authority operated); and,
- (d) the total number of competitors within a 30-minute cortege drive time from the crematorium.

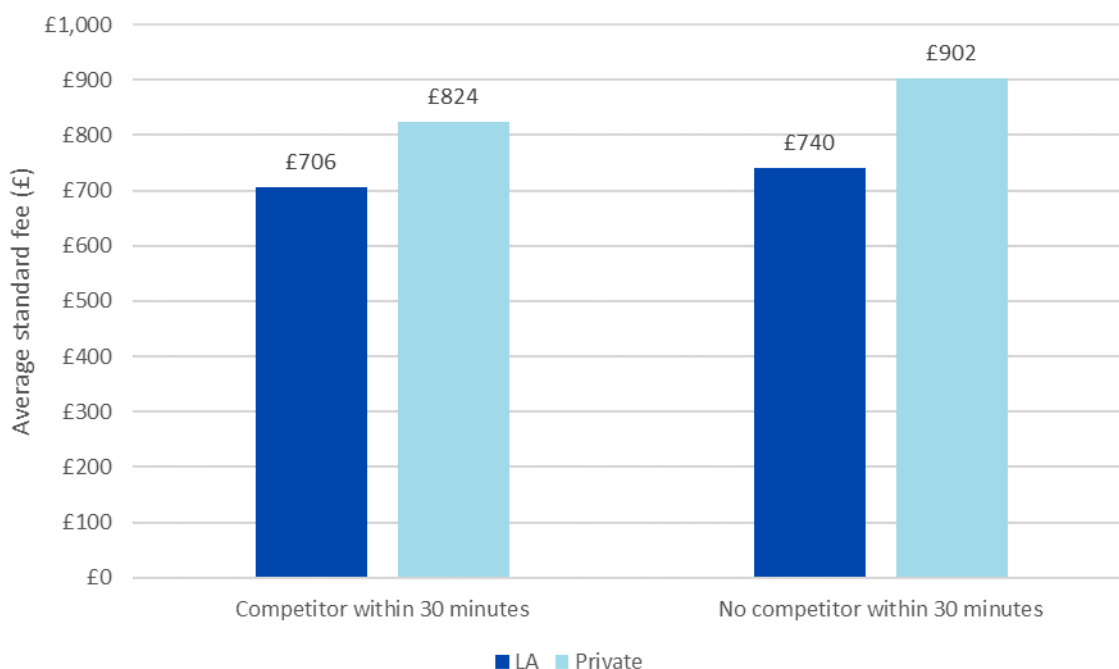
Presence of a competitor within a 30-minute cortege drive time

- 28. We have considered whether average standard cremation fees are lower in areas where there is a competitor within a 30-minute cortege drive time relative to areas where there is not.
- 29. Figure 6, below, illustrates how the average standard cremation fee varies between these two groups of crematoria, split by private and local authority provider. The figure shows that fees tend to be higher (5% higher at local authority crematoria and 9% higher at private crematoria) at those crematoria with no rivals within 30 minutes compared with those that do have a rival within 30 minutes.

²¹ [CMA Consumer Research](#), paragraph 4.2.5.

²² For example, [redacted], prepared on behalf of Dignity describes a crematorium's catchment area as: "a reasonable maximum acceptable drive-time to a facility, usually 30 minutes. A 30-minute maximum drive-time for catchment areas was used in the need assessments for [lists various planning applications]. This drive time is to be assessed by reference to the slower travelling speed of a cortège. This is usually calculated at 60% of normal driving speed."

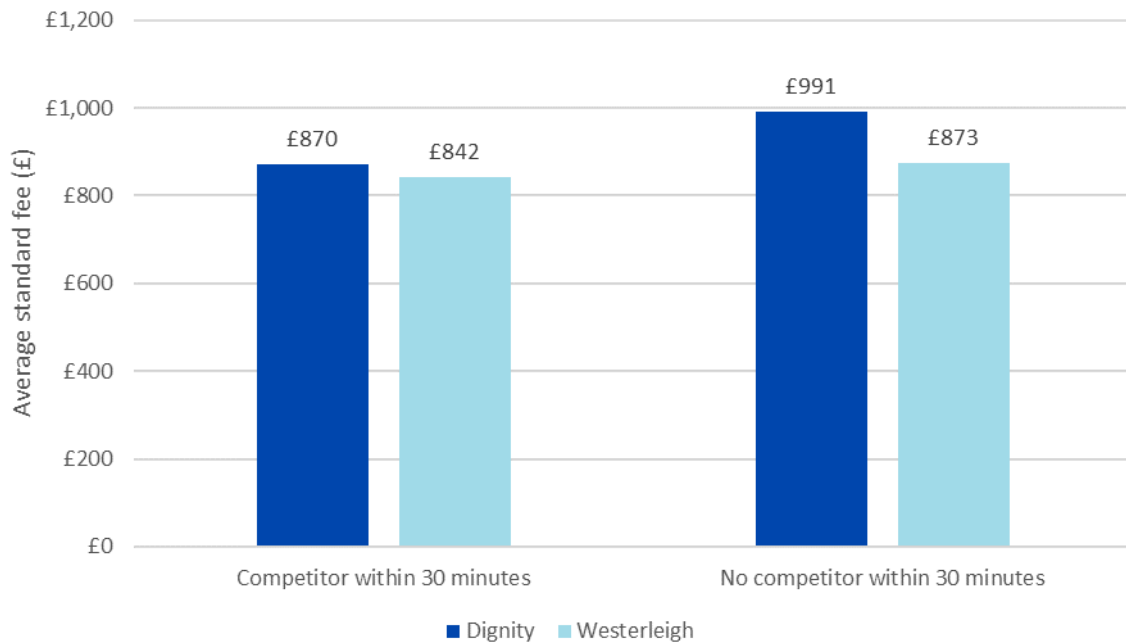
Figure 6: Average standard cremation fees and presence of a competitor within a 30-minute cortege drive time, 2018



Source: CMA analysis of Cremation Society data. Number of local authorities with competitor in 30 minutes (95), number of private crematoria with competitor in 30 minutes (52), number of local authorities with no competitor in 30 minutes (88) and number of private crematoria with no competitor within 30 minutes (60).

30. We have also focused on, more specifically, Dignity and Westerleigh crematoria to see whether or not the presence of a competitor within a 30-minute cortege drive time is associated with different average fees at their crematoria. We have not focussed on other providers given the smaller number of crematoria that they operate.

Figure 7: Average standard cremation fees and presence of a competitor within a 30-minute cortege drive time, Dignity and Westerleigh, 2018



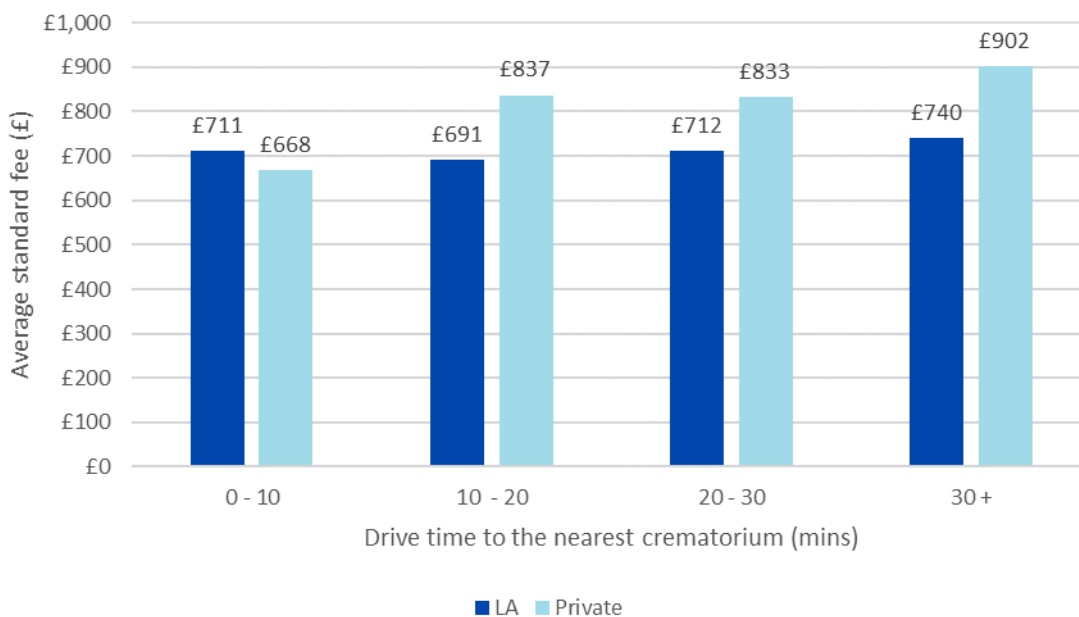
Source: CMA analysis of Cremation Society data. Number of Dignity crematoria with a competitor within 30 minutes (21), number of Dignity crematoria with no competitor within 30 minutes (25), number of Westerleigh crematoria with a competitor within 30 minutes (13) and the number of Westerleigh crematoria with no competitor within 30 minutes (18).

31. Figure 7, above, illustrates how the average standard fee varies between these two groups of crematoria, within either Dignity or Westerleigh’s estate of crematoria. The figure shows that fees tend to be higher (14% higher at Dignity crematoria and 4% higher at Westerleigh crematoria) at those crematoria with no rivals within 30 minutes compared to those that do have a rival within 30 minutes.

Cortege drive time to the nearest competitor

32. We have calculated the average standard cremation fee by cortege drive time to the closest rival crematorium, using four drive-time bands (ie 0-10, 10-20, 20-30 and more than 30 minutes).

Figure 8: Average standard cremation fees and cortege drive time to the nearest competitor, 2018

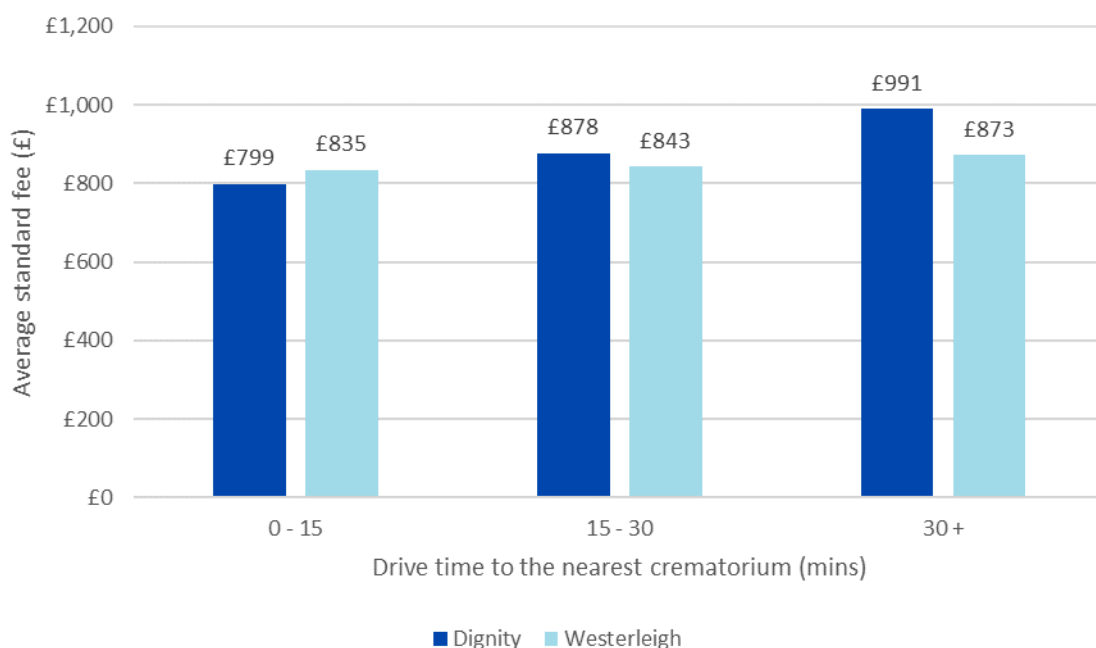


Source: CMA analysis of Cremation Society data. Please note there are a limited number of observations in the 0-10-minute time band for both local authority and private crematoria. In the 0-10-time band, there are 3 local authority and three private crematoria. In the 10-20-time band, there are 27 local authority and 12 private crematoria. In the 20-30-time band, there are 65 local authority and 37 private crematoria. In the 30+ time band there are 88 local authority and 60 private crematoria.

33. Figure 8 shows that, for those local authority crematoria with a rival within 30-minutes, average fees do not vary significantly depending on the drive time to the closest rival. For private crematoria with a rival within 30 minutes, average fees are materially lower when their closest rival is less than 10 minutes away compared with private crematoria that have a rival within 10-30 minutes (an average fee of £668 compared with average fees of over £825, a 25% step up).
34. This suggests that private crematoria which have a rival within 30 minutes and face a close competitor (ie within 10 minutes) charge lower fees on average. However, we note that there is a very small number of private crematoria that have an alternative within a 10-minute cortege drive time (three). Furthermore, as noted above, for private providers there is a big step up in fees when the closest rival is further than 10 minutes away. This suggests that, to the extent there is any pricing constraint on private crematoria based on the proximity of the nearest rival, this constraint weakens over a relatively short drive time and applies to a very small number of crematoria.
35. We have also considered whether there was a similar pattern when looking at Dignity and Westerleigh crematoria. We have aggregated time bands for these crematoria given the small number of Dignity and Westerleigh crematoria in the lower time bands (noting that there are still only two Dignity and two Westerleigh crematoria in the 0 to 15-minute time band). For both

providers average fees are higher at crematoria where the nearest rival is further away but the pattern is more pronounced among Dignity crematoria. Westerleigh crematoria who have a rival within 30-minutes only see a small step up in average fees (less than £10) between those with the nearest rival up to 15 minutes away and those with the nearest rival between 15 and 30 minutes away.

Figure 9: Standard cremation fees and cortege drive time to the nearest competitor, Dignity and Westerleigh, 2018



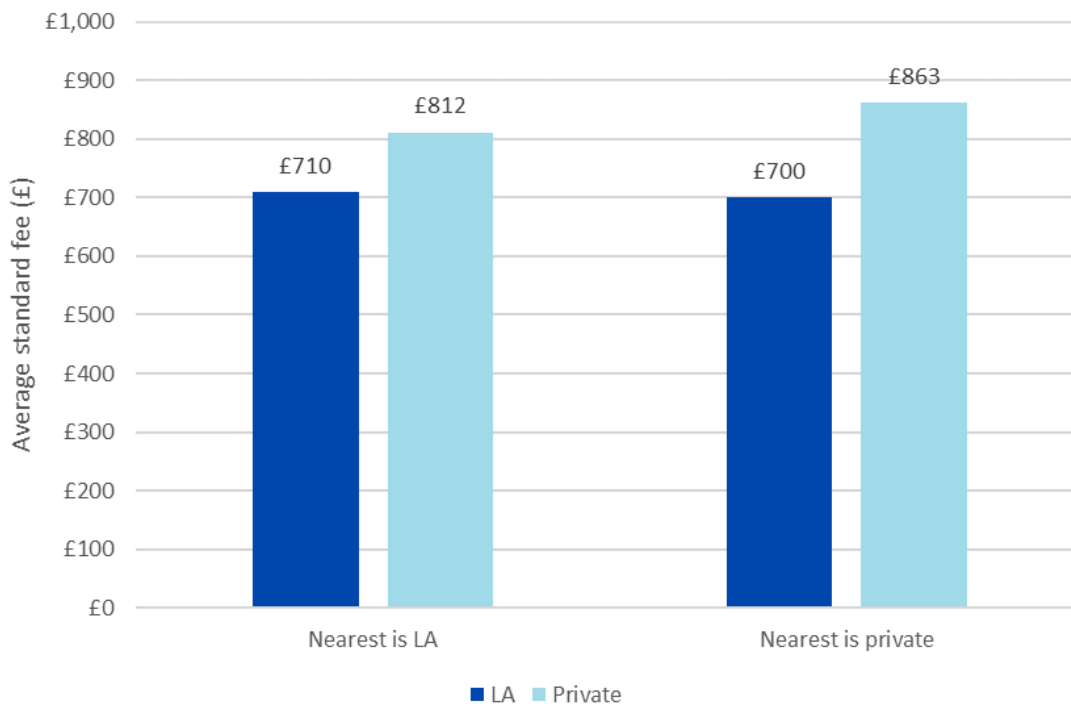
Source: CMA analysis of Cremation Society data. In the 0-15-minutes time band there are two Dignity and two Westerleigh crematoria. In the 15-30-minutes time band, there are 19 Dignity and 11 Westerleigh crematoria. In the 30+minutes time band there are 25 Dignity and 18 Westerleigh crematoria.

Identity of the nearest competitor

36. For those crematoria that have an alternative within 30 minutes, we have compared average standard cremation fees split by whether the alternative is a private or local authority crematorium.²³ Private crematoria tend to be slightly cheaper, on average, when their nearest rival is operated by a local authority.

²³ We considered this analysis for Dignity and Westerleigh crematoria only but there are a limited number of Dignity and Westerleigh crematoria with a rival within 30 minutes (21 and 13 respectively), and most of these are close to a local authority crematorium and not a private one (only seven Dignity crematoria are closest to a private crematorium and three Westerleigh).

Figure 10: Standard cremation fees and identity of nearest competitor within 30-minute cortege drive time

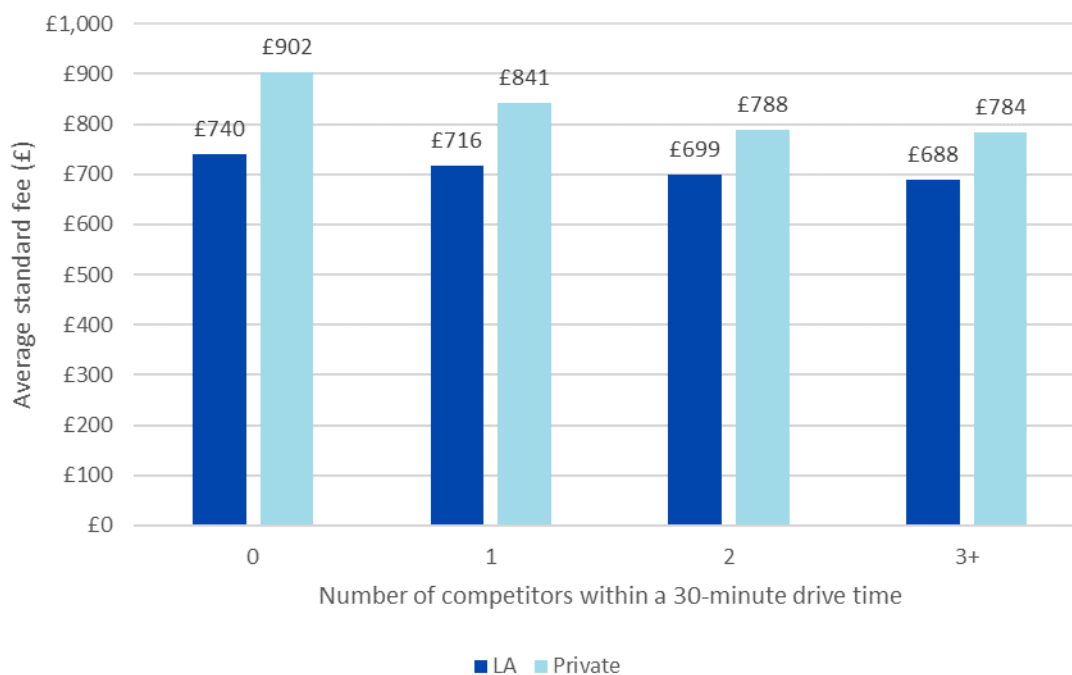


Source: CMA analysis of Cremation Society data. The number of local authority and private crematoria that have a local authority crematorium as their nearest rival within 30 minutes is 62 and 39. The number of local authority and private crematoria that have a private crematorium as their nearest rival within 30 minutes is 33 and 13.

Number of competitors within a 30-minute cortege drive time

37. Finally, we consider the number of competitors that a crematorium faces within a 30-minute cortege drive time, to test whether standard cremation fees are, on average, lower when there are more rivals.

Figure 11: Standard cremation fees and number of competitors within a 30-minute cortege drive time



Source: CMA analysis. Number of local authority and private crematoria that have no competitor within 30 minutes is 88 and 60 respectively. Number of local authority and private crematoria that have one competitor within 30 minutes is 52 and 36 respectively. Number of local authority and private crematoria that have two competitors within 30 minutes is 25 and 11 respectively. Number of local authority and private crematoria that have three or more competitors within 30 minutes is 18 and 5 respectively.

38. Figure 11 shows that, across both local authority and private crematoria, standard cremation fees tend to be lower when the number of competitors increases from one to three or more within a 30-minute cortege drive time (4% lower for local authorities and 7% lower for private crematoria).²⁴ However, the addition of each additional rival does not reduce average fees significantly. For example, local authorities with one rival charge £716 on average, falling by less than £20 to £699 with the addition of a second rival. A similar pattern is present with private providers, for example, private providers with two rivals within 30 minutes charge, on average £788, and this falls by less than £10 to £784 when there are three or more rivals present within 30 minutes. We also note that there is only a small number of crematoria that have three or more rivals within a 30-minute cortege drive time (18 local authority crematoria and five private crematoria).

²⁴ As above, we considered splitting this by Dignity and Westerleigh crematoria only, but few Dignity or Westerleigh crematoria had more than one rival within 30 minutes (8 Dignity crematoria and 2 Westerleigh crematoria had more than one rival within 30 minutes).

Summary

39. On average, fees at crematoria with alternatives within 30 minutes tend to be lower than fees at crematoria without alternatives. For crematoria who have at least one rival within 30-minutes, differences in average fees depending on whether the closest rival is located relatively close or further away are often small, as are differences in average fees depending on the number of rivals located within 30-minutes. For example, average local authority fees when the closest rival is located 20-30 minutes away are £712, falling slightly to £691 when the closest rival is closer (10-20 minutes away). Private providers with two rivals within 30 minutes charge, on average £788, and this falls by less than £10 to £784 when there are three or more rivals within 30 minutes. Furthermore, while fees at private crematoria are materially lower on average when their closest rival is less than 10 minutes away (an average fee of £668 compared with average fees of over £825 when the closest rival is further away), there are very few instances of crematoria being located very close to one another (ie within 10-minutes).

Crematoria margins and local concentration

40. We have gathered margins based on earnings before interest, tax, depreciation and amortisation (EBITDA margins) for 2018 from Dignity, Westerleigh and Memoria management accounts, as well as from a representative sample of local authority crematoria.²⁵ Table 1 summarises the data that we have gathered. It shows that average EBITDA margins range between [30-40%] and [50-60%] depending on the provider (⌘).

Table 1: EBITDA margins, 2018

<i>Provider</i>	<i>Number of observations</i>	<i>Average EBITDA margin, %</i>	<i>Minimum EBITDA margin, %</i>	<i>Maximum EBITDA margin, %</i>
Dignity	46	[⌘]	[-10- -20]	[80-90]
Westerleigh	32	[⌘]	[-60- -70]	[70-80]
Memoria	9	[⌘]	[0-10]	[50-60]
Local authorities	17	47	8	83

Source: Dignity, Westerleigh and Memoria management accounts. Submissions from sampled local authorities.

Notes:

- (1) Two crematoria recorded negative EBITDA margins, these are both relatively new (although newer crematoria do not necessarily have low margins).
- (2) Westerleigh notes that as these margins are taken from management accounts (rather than statutory accounts) they do not, for example, reflect an allocation of central overheads borne by their business.
- (3) Dignity notes that some figures relate to crematoria with cemeteries. We note that our analysis does not account for exceptional items (for example, Dignity notes that for one crematoria EBITDA margins are high due to an exceptional revenue item).

²⁵ Our approach to selecting these crematoria is described in paragraphs 139-144 of the CMA paper: [Approach to profitability and financial analysis](#).

41. All else being equal, we would expect that margins will be lower in less concentrated areas, ie where crematoria face more or closer rivals, than in more concentrated areas. We have tested whether crematoria with closer or more rivals have lower margins relative to other crematoria.
42. Figure 12 shows margins for the Dignity, Westerleigh, Memoria and local authority crematoria as described above, plotted against the cortege drive time to the closest rival crematorium.

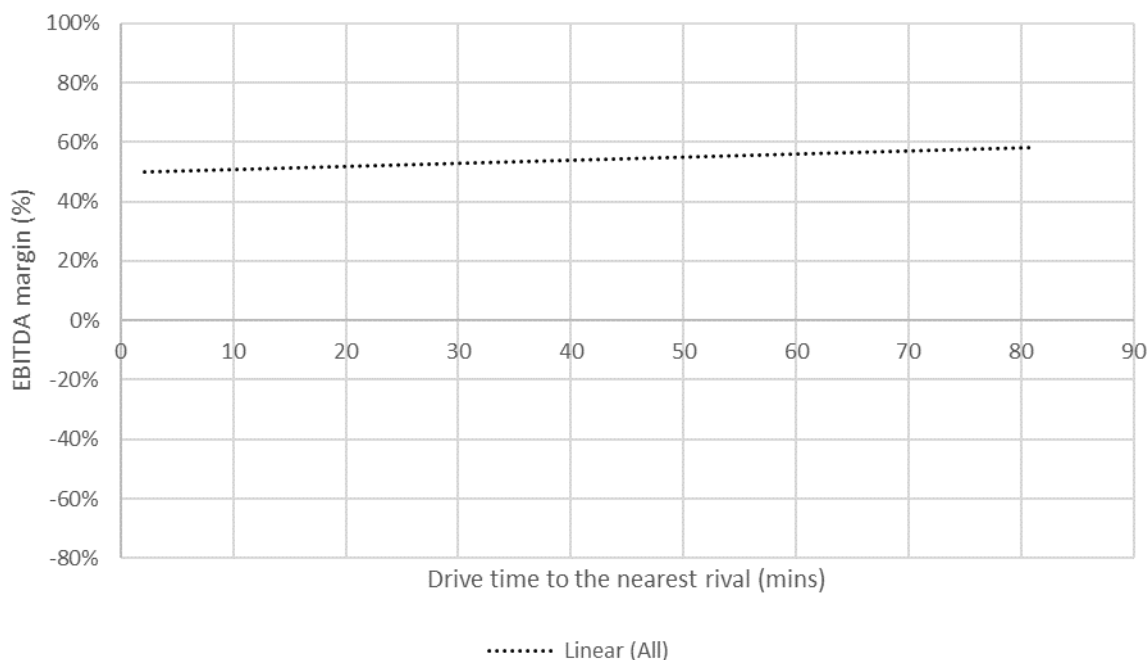


Figure 12: Dignity, Westerleigh, Memoria and local authority crematoria 2018 EBITDA margins and cortege drive time to nearest rival crematorium

Source: CMA analysis of Dignity, Westerleigh, Memoria and sampled LA management accounts.

Notes:

- (1) Drive time analysis conducted using ESRI UK Limited's Arc GIS Pro software and the StreetMap Premium network.
- (2) Drive times are based on cortege driving speeds.
- (3) The Memoria trend line is not included given we only have four observations for Memoria. There are five further Memoria crematoria for which we have data that were not included in this analysis. The inclusion of these crematoria does not materially affect the results.
- (4) We considered two adjustments to the analysis. Firstly, we considered whether or not we should remove crematoria from the analysis where the crematorium derived a relatively high proportion (20%) of its revenue from burials and memorials relating to burials. We found that removing these crematoria did not make a material difference to the outcome of our findings. Secondly, we considered removing new crematoria, given their margins may not be typical. However, we found that crematorium that opened during 2018 had a range of margins (from negative to positive) and their margins did not appear materially different to older crematoria (with the exception of two new crematoria with negative margins).

43. The graph shows that there is no clear correlation between the distance to the nearest competitor and the margins earned: generally, the margins earned by crematoria that have an alternative located closer are not consistently lower than those earned by crematoria with their closest competitors located further

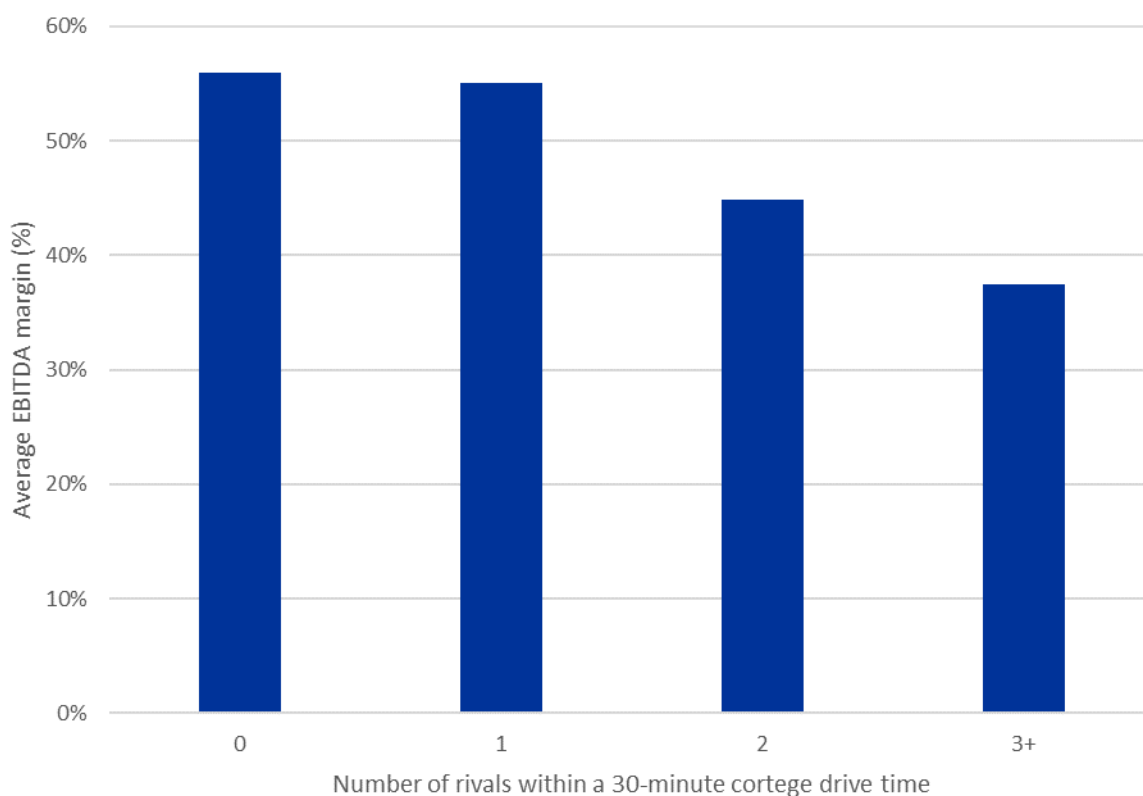
away.²⁶ However, this graph does not account for the number of rivals that a crematorium faces in a given area. We have therefore assessed whether the EBITDA margins earned by crematoria with at least one rival within a 30-minute cortege drive time (ie those crematoria plotted towards the left of Figure 12) varies with the number of rivals.

44. We found that Dignity/Westerleigh/Memoria and sampled local authority crematoria with one alternative within 30 minutes had an average EBITDA margin of 55% whilst those that did not had an average EBITDA margin of 56%.²⁷ Those with two rivals had an average margin of 45%, and those with three or more had an average of margin of 37%. We note there is a lot of variation in the margins made by different crematoria (within the same provider) and note the relatively small number of crematoria that have two, or three or more rivals within a 30-minute cortege drive time.

²⁶ We have considered how this result can be explained in light of the result set out above that crematoria with closer rivals tend to have lower fees on average. Figure 8 and Figure 9 show that, on average, crematoria with closer rivals tend to have lower fees than crematoria with rivals further away, and that this is particularly the case for private crematoria and is most pronounced at Dignity crematoria (Dignity crematoria with a rival within 15 minutes charge an average standard fee of £799, whilst those who have their closest rival between 15- and 30-minutes charge, on average, £878). [38].

²⁷ Based on looking at whether a crematorium has an alternative within a 30-minute cortege drive time.

Figure 13: Average EBITDA margin by number of rivals within a 30-minute cortege drive time

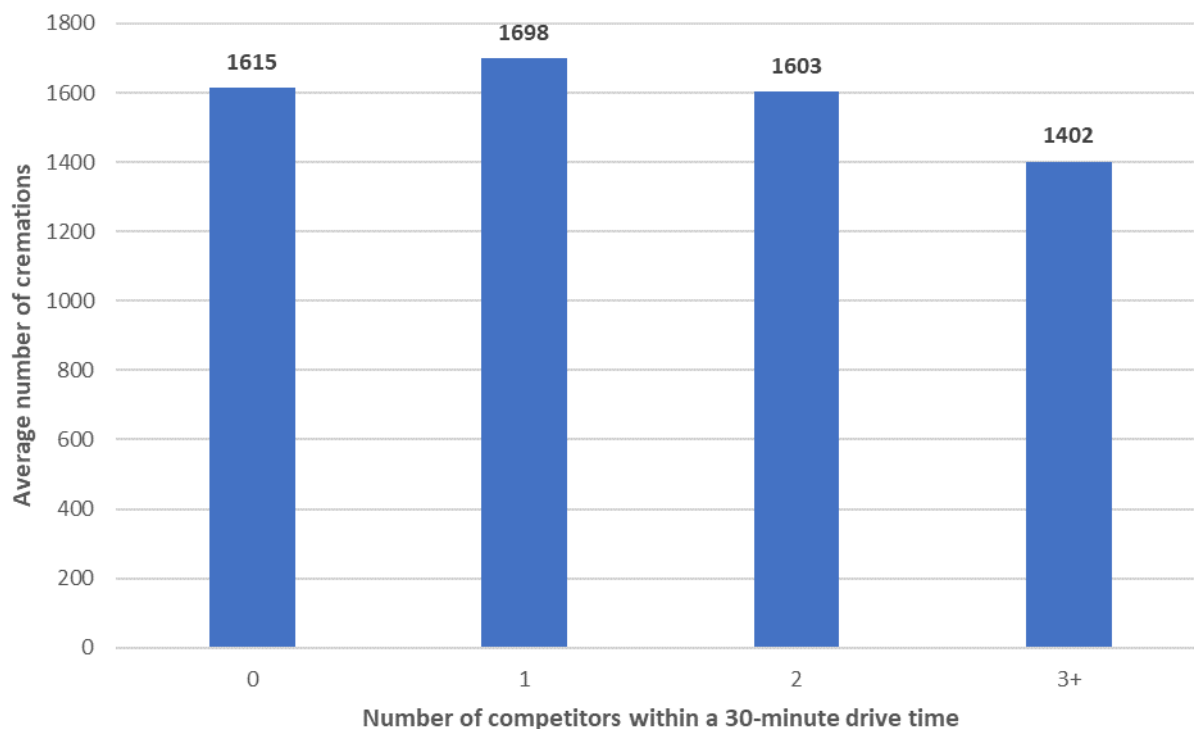


Source: CMA analysis of parties' data. We have data on EBITDA margins for 99 crematoria. 53 of these crematoria have no competitor within 30 minutes and 32 of these crematoria have a competitor within 30 minutes, 9 have two rivals within 30 minutes and 5 have at least three rivals. There are five further crematoria for which we have data that were not included in this analysis. The inclusion of these crematoria does not materially affect the results.

45. Whilst there does not appear to be a clear correlation between margins and the drive time to the closest crematorium, the small number of crematoria with two or more rivals within a 30-minute cortege drive time appear to have lower EBITDA margins than those with no or only one rival. An increased number of competitors may lead to lower margins as, all else equal, a crematorium facing more competitors may either conduct fewer cremations (and thus have higher average costs) or charge lower fees (or a combination of both).
46. In Figure 8, Figure 9 and Figure 11 we have shown that crematoria with more or closer rivals charge less, on average, compared to those with fewer rivals. This is more pronounced among private crematoria (which charge, on average, £784 at crematoria with three or more rivals within 30 minutes, increasing to £902 when there are no rivals within 30 minutes).
47. We have also considered whether crematoria facing more rivals within a 30-minute drive time conduct more or fewer cremations compared with crematoria facing fewer rivals. Figure 14 shows that crematoria with more rivals conduct fewer cremations on average. However, crematoria with no

rivals conduct fewer cremations, on average, compared with those with one rival within a 30-minute cortege drive time (this may be explained by the fact that crematoria with no rivals are likely to be in areas with a lower demand for cremations).

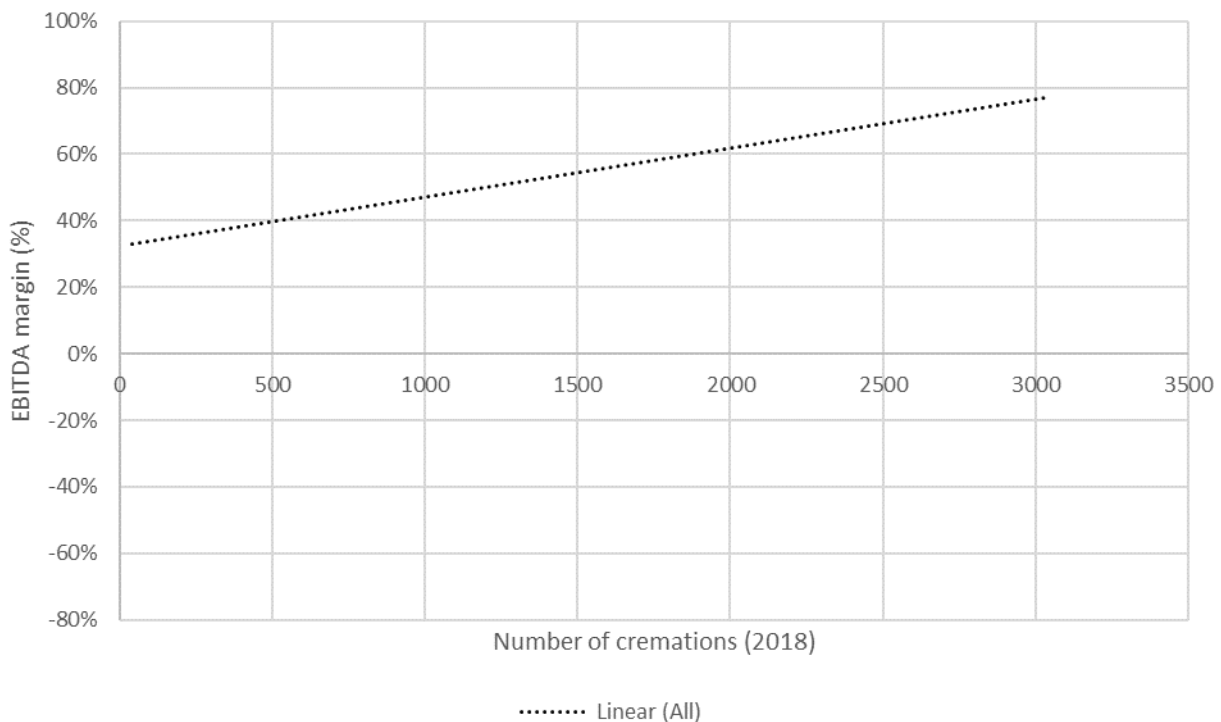
Figure 14: Average number of cremations conducted and number of competitors within a 30-minute cortege drive time, 2018



Source: CMA analysis of Cremation Society data.

48. Finally, we have assessed the correlation between the EBITDA margin earned by a crematorium and its volumes. Figure 15 shows that EBITDA margins increase as volumes increase.

Figure 15: Correlation between EBITDA margins and volumes, 2018



Source: CMA analysis of Dignity, Westerleigh, Memoria, 21 local authorities and Cremation Society data. There are five further crematoria for which we have data that were not included in this analysis. The inclusion of these crematoria does not materially affect the results.

Summary

49. EBITDA margins are not clearly correlated with the drive-time to the closest rival, but, on average, EBITDA margins slightly decrease with the number of rivals within a 30-minute drive time. Crematoria with more rivals charge, on average, lower fees, and conduct fewer cremations (and thus are likely to face higher average costs), with both factors likely explaining the lower margins that these crematoria earn.

Quality outcomes

50. We have received some anecdotal evidence which suggests that there are some quality issues in the provision of crematoria services. Westerleigh in particular told us of around 100 local authority crematoria (ie roughly half of all local authority crematoria) where it considers quality to be 'poor' or 'very poor.'²⁸ SAIF considered that private crematoria can have "a much higher

²⁸ [Summary of the hearing with Westerleigh.](#)

standard of finish quality than public [crematoria] in some regions.”²⁹ We have also heard of some poor quality crematoria from independent funeral directors.³⁰

51. Representations to the CMA have focussed on the following:
 - (a) That new, private crematoria tend to offer a higher quality service compared with local authority crematoria;³¹ and,
 - (b) when making comparisons between crematoria fees, the CMA needs to consider the role of quality, in particular that quality differentials may account for differences in fees.³²
52. We have considered the evidence that we have gathered in relation to these two issues next. We have also briefly summarised below the evidence that we have gathered as to whether the quality offered by crematoria (as measured by slot length and availability of facilities) is correlated with whether or not the crematorium has a rival within a 30-minute cortege drive time.

Overview of our assessment of quality

53. When assessing the extent to which there is a quality differential, we note that a comprehensive comparison of all aspects of quality between crematoria is not possible. There are many aspects of quality, not all of which are measurable, quantifiable or objective. However, we have gathered data that has allowed us to compare some measurable aspects of quality at different crematoria (most notably, slot length and availability of certain facilities: music systems, web streaming and visual tributes). Where aspects of quality are harder to measure, we have assessed the qualitative evidence available to us.
54. We have considered the extent to which slot length should be considered a measure of quality. The Funerals Market Study report noted that slot length

²⁹ [Summary of the hearing with SAIF](#), page 8.

³⁰ See paragraphs 83 and 98 for further details.

³¹ [Summary of the hearing with Westerleigh](#), page 1: “Westerleigh said that the market was still dominated by local authorities and there was an increasing differential in the quality of crematoria with older sites, often delivering a poor service, and the better quality offered at newly opened crematoria.” [Summary of the hearing with Memoria](#), page 1: “The second point was that rivals, including local authority crematoria, imposed price constraints on Memoria although they operated at different price and quality levels.”

³² [Westerleigh response to Issues Statement](#), paragraph 6.2.4c: “Westerleigh’s prices are not necessarily higher when qualitative factors are taken into account.” [Dignity response to Issues Statement](#), paragraph 3.12: “In considering... price differentials between suppliers, the CMA will understand the need for like-for-like comparisons. Differences between suppliers in quality and cost obligations must be taken into account to make a fair and consistent comparison between them.” [Memoria response to Issues Statement](#), page 5: “there is typically a significant quality differential between new entrants and incumbents, which is reflected in prices offered.”

appeared to be driven by supplier considerations (notably capacity) as opposed to customer needs or demands. Furthermore, the Funerals Market Study report noted that other aspects of quality appeared to be more important to customers when choosing a crematorium.³³ The Market Investigation consumer survey found that only 1% of customers (n=4) considered that the appropriate/right/ideal slot length was important in their choice of crematorium although none said that it was the most important factor in their choice of crematorium.³⁴ We have been told that longer slots can help reduce a 'conveyor belt' feeling,³⁵ but we have seen how this can be mitigated, to some extent, by crematorium design.³⁶ Finally, the evidence outlined in paragraph 20 suggests that the marginal benefit of extending slots may reduce as slots get longer.

55. However, we have found evidence of local authority crematoria increasing the length of their slots to meet customer demand,³⁷ suggesting that, to some extent, slot length is important to customers. Although additional evidence from local authorities (and representations from private providers) suggests that slot length may be important to customers, the Market Investigation consumer survey did not find this to be the case. Nevertheless, for the purposes of our analysis we have included slot length as a measure of quality.
56. Given the difficulties in measuring quality comprehensively, as outlined above, to the extent that providing higher quality entails higher costs (relative to offering lower quality services), crematoria offering higher quality may reflect this by charging higher fees compared with lower quality crematoria. A direct comparison of quality and price is not possible given that quality is multi-dimensional and not all aspects are measurable and comparable across different crematoria and providers. To the extent that higher quality is related to higher costs, our profitability analysis takes this into account in measuring

³³ [Market Study report](#), paragraph 5.63.

³⁴ Market Investigation consumer survey, Tables 326-334, Questions C7a and C7b. Base: All adults 18+ in the UK who arranged an at need cremation with a high street funeral director, or arranged an attended cremation with an online-only funeral provider, or who arranged an at need cremation without a funeral director in the past 24 months, and the deceased had not made their wishes known (n=339).

³⁵ Dignity has stated that a minimum 45-minute slot is required to avoid "the feeling of a 'conveyor belt' operation. Memoria has stated: "We have a commitment to all bereaved families that use our facilities and one of the most common pieces of feedback that we receive is that no-one wants to feel part of a tragic conveyor belt – as such, we try to ensure that all families have the site to themselves by offering one-hour time slots to all services." Westerleigh has stated that "45 minutes and hour slots typically being sufficient time to allow even large parties of mourners to enter and exit in plenty of time without feeling rushed."

³⁶ As seen on site visits. Dignity also stated during a meeting with the CMA that segregation between entry and exit was a feature of crematorium design that they aimed for to ensure the privacy of mourners: "The idea for us is the greater the segregation we have in areas between entrance and exit, the more privacy the family have. So particularly with new crematoria now, that is one of the key design features to say how can we keep that segregation, so it is private?"

³⁷ Rushmoor Borough Council, City of Cardiff Council, Kingston-Upon-Hull City Council, Salford City Council, London Borough of Croydon, Bolton Council, Hyndburn Borough Council, Birmingham City Council, Brighton & Hove City Council.

the returns earned by different crematoria. The analysis, set out below, aims to assess the extent to which quality differs between crematoria and whether higher fees at certain crematoria are consistently associated with higher quality measures.

57. This paper focusses on front of house quality.³⁸ With respect to back of house quality, we have not been told about any significant variations in back of house quality between crematoria, nor have we heard of any significant concerns about poor back of house quality. In any event, certain aspects of back of house quality are regulated and licensed (in particular, those aspects relating to the conditions under which cremations may take place, the documentation that must be provided before a cremation may be authorised, the incineration of body parts, the disposition or interment of ashes, the registration of cremations carried out and the preservation of documents relating to the cremation).³⁹ Furthermore, the CMA's site visits to private and local authority crematoria have shown that the back of house consists almost entirely of the cremator and abatement technology.

Evidence on the extent to which private crematoria are characterised by higher quality compared with local authority crematoria

58. We have compared certain quality metrics across different crematoria:
- (a) Averages across local authority and private crematoria;
 - (b) averages across neighbouring local authority and private crematoria;
 - (c) averages across crematoria (both private and local authority) of different ages; and,
 - (d) qualitative measures from third party reports, customer satisfaction surveys and commentary provided to the CMA during the Market Investigation to date.

Averages across local authority and private crematoria

59. We have considered the extent to which local authority and private crematoria differ, on average, against various measures of quality. We have compared

³⁸ Where we define front of house quality to be aspects of the service that a crematorium provides, that the consumer observes, such as the condition of the crematorium build and chapel. Back of house quality are aspects of the service that cannot be observed, such as the handling of the deceased.

³⁹ Phase 1 report, [Annex A](#), paragraphs 22-25, 32-33, 40-43.

data on slot length, the availability of visual tributes, web streaming, music streaming, and recent capital expenditure.

60. The average booking slot and service lengths for local authority crematoria are 43 minutes and 30 minutes respectively.⁴⁰ This is shorter compared with private providers, who have average slot lengths and service lengths of 56 minutes and 37 minutes respectively.⁴¹
61. A lower proportion of local authority crematoria offer visual tributes or streaming facilities compared with private crematoria. In relation to visual tributes, [50-60%] of private crematoria offer these facilities compared with [50-60%] for local authority crematoria, and in relation to web streaming [50-60%] of private crematoria offer these facilities compared with [30-40%] for local authority crematoria. We also note the availability of music streaming is similar across local authority and private crematoria, where around [85-95%] of both local authority and private crematoria provide such services.⁴²
62. We have compared the average spend on investments (excluding investments in new crematoria) in the last five years by private and local authority crematoria.⁴³ We found that private and local authority crematoria, on average, spent around £384,000 and £677,000 respectively over the last five years.⁴⁴ We note that to the extent that crematoria are older, we might expect them to have higher capital spending compared to newer crematoria in order to maintain and refurbish existing facilities.

Averages across local authority and private crematoria when they neighbour each other

63. We have also assessed the quality differential between private crematoria and nearby local authority crematoria. We have looked at the 41 areas where a private provider has a local authority crematorium as their nearest competitor (within a 30-minute cortege drive time). We have tested, in those instances

⁴⁰ Based on data supplied by crematoria providers. We average over 183 local authority crematoria in both cases.

⁴¹ Based on data supplied by crematoria providers. We average over 113 and 108 private crematoria respectively.

⁴² CMA analysis of Dignity Trajectory market research. The following percentages we note here are based on 183 local authority crematoria who provided information for all facilities mentioned, 106 private crematoria who provided information, for live streaming and music and 107 private crematoria who provided information for visual tributes.

⁴³ We asked Dignity, Westerleigh, and Memoria to describe and state the level of capital investments between 2014-2018. We asked all local authorities and smaller private providers to list significant investments in the last five years for each of their crematoria. We have tried to exclude any investments related to cemeteries where data allows for this. For new builds, we have included data relating to all years after the year of opening (and excluded data for the year of entry and years before entry).

⁴⁴ Where, for local authority crematoria, we have averaged over 163 out of 185 crematoria, and for private crematoria, we have averaged over 101 out of 118 crematoria.

where private providers and local authority crematoria are located close to one another, whether or not such crematoria are comparable in terms of slot length and availability of facilities.

64. In relation to slot length, on average across the 41 areas, private providers offer longer slot lengths by around 10 minutes, relative to their nearest local authority rival (where private providers and their nearest local authority crematorium have an average slot length of 56 minutes and 46 minutes respectively).⁴⁵ This difference in slot length is slightly smaller than the average across all private and local authority crematoria. In relation to the availability of music, visual and web streaming facilities, in over half of the areas considered, the availability of these facilities is the same at the neighbouring local authority and private crematoria (ie either both the private and local authority crematorium offer the facility, or both do not). For the remaining areas, private crematoria offer web streaming and visual tributes more often than local authority crematoria, while local authority crematoria offer music systems more often than private crematoria. Table 2 summarises these results. Local authorities who are the closest rival to a private crematorium (within 30 minutes) are less likely to offer visual tributes and web streaming compared with local authority crematoria more generally. 15 out of 36 local authorities (42%) offer visual tributes and 9 out of 35 local authorities (26%) offer web streaming when close to a private crematorium, compared with [50-60%] and [30-40%] more generally (as described in paragraph 61).

Table 2: Availability of certain facilities at neighbouring local authority and private crematoria, 2018

	<i>Number of areas where both private and local authority offer facility</i>	<i>Number of areas where both private and local authority do not offer facility</i>	<i>Number of areas where only private offers facility</i>	<i>Number of areas where only local authority offers facility</i>
Music system	24	0	5	6
Visual tributes	8	11	10	7
Web streaming	4	14	12	5

Source: CMA analysis of Trajectory market research data and CMA drive time analysis. For music systems, visual tributes and web streaming, we have data on 35, 36 and 35 areas respectively.

65. We have also compared the level of investment, over the last five years, that the crematoria included in these pairings undertake. We have found that private crematoria that have a rival local authority facility within 30 minutes

⁴⁵ Where we have averaged over 38 out of 41 crematoria in this case.

undertake investments worth, on average, £367,000 over the five-year period (slightly lower than the average private level of investment of £384,000 reported in paragraph 62). This contrasts with neighbouring local authority crematoria, where these crematoria undertake investments worth, on average, around £713,000 (slightly higher than the average local authority level of investment of £677,000 reported in paragraph 62).

Averages across crematoria of different ages

66. Westerleigh has argued that quality differentials may particularly apply when comparing existing crematoria with newer crematoria.⁴⁶ As such, we have compared certain measures of quality between newer (ie opened during or after 2008) and older (ie opened before 2008) crematoria.
67. Private crematoria tend to be newer than local authority crematoria. The proportion of Dignity, Westerleigh and Memoria’s estate built in the last 10 years is 20%, 56% and 100% respectively. This contrasts with local authority crematoria, where 4% of such crematoria have been built in the last 10 years.⁴⁷
68. Table 3, below, illustrates the extent to which newer crematoria are of ‘higher quality’ based on some observable measures of quality. Newer crematoria (which are mainly private crematoria), are, on average, higher quality compared with older crematoria based on the specific measures of quality that we describe below.

Table 3: Slot length and availability of certain facilities at old and new crematoria, 2018

	<i>Average slot length, minutes</i>	<i>Proportion with music systems, %</i>	<i>Proportion with visual tributes, %</i>	<i>Proportion with web streaming, %</i>
Crematoria opened during or after 2008	58	95	80	70
Crematoria opened prior to 2008	46	87	47	39

Source: CMA analysis of ICCM data, data from providers and Trajectory market research data. 246 crematoria have opened before 2008, 57 have opened during or after 2008.

⁴⁶ [Summary of the hearing with Westerleigh](#), p1: “Westerleigh said that the market was still dominated by local authorities and there was an increasing differential in the quality of crematoria with older sites, often delivering a poor service, and the better quality offered at newly opened crematoria.”

⁴⁷ This includes local authority crematoria that have been replaced.

Qualitative measures of quality

69. We next summarise the qualitative evidence on quality differentials between local authority and private crematoria based on the following sources of evidence: the Scottish Inspector of Crematoria, the ICCM Charter for the Bereaved, customer satisfaction surveys and evidence from interviews with crematoria and independent funeral directors.

Scottish Inspector of Crematoria

70. As of May 2018, HM Inspector of Crematoria for Scotland, Robert Swanson, had inspected all 30 crematoria that are operational in Scotland.⁴⁸ Of those crematoria inspected, 14 are operated by a local authority, with the remaining 16 being operated by private providers (ie Dignity, Westerleigh and small private providers).⁴⁹
71. We note that the overall findings across crematoria were such that “overall performance was considered to be of a good standard with crematoria staffed, in the main, by experienced, enthusiastic, efficient and caring team members.”⁵⁰
72. We looked at the individual reports for each crematorium. These reports give a view on the overall running of a crematorium with particular reference to its staff (and back of house quality). We assessed these crematorium-level reports to see if the Inspector of Crematoria had identified any areas where local authority and private crematoria were materially different in terms of quality of service offered, the quality of staff, and overall upkeep of sites. We found that similar comments were made in relation to each crematorium in Scotland and did not find a clear-cut or systematic difference in reported quality between private and local authority crematoria in Scotland.

ICCM Charter for the Bereaved

73. We have assessed scores from the ICCM’s Charter for the Bereaved to understand the extent to which there is a quality differential between crematoria.⁵¹ The ICCM asks its members questions around a number of

⁴⁸ Annual Report – HM Inspector of Crematoria, p1 and p2. We note an additional private crematorium has since opened in Scotland.

⁴⁹ Annual Report – HM Inspector of Crematoria, p2.

⁵⁰ Annual Report – HM Inspector of Crematoria, p2.

⁵¹ Private providers have noted that they do not think the ICCM Charter is an appropriate way to measure quality. [§] notes that they “operate outside of that (ICCM Charter), because, in our experience, we do a much more thorough job than that demands... I do not believe that they have the concept of the attention to detail that we have in terms of how they assess crematoria.” We also note that [§] does not subscribe to the ICCM charter, since they prefer their own monitoring of quality. Instead, they are working with the Federation of Burials and

measures such as the extent to which basic procedural criteria are met (such as the safe handling of cremated remains), the service features that are provided (such as a minimum slot length of 30 minutes and availability of facilities) and how regulatory standards are met (such as environmental abatement targets). Members are then allocated scores based on how well they meet the above criteria, where a gold award represents a crematorium meeting many or all the above measures.⁵²

74. There were 81 local authority crematoria, 4 Dignity crematoria and 1 Westerleigh crematorium measured under the scheme as of March 2019. Of these crematoria, 83% receive a gold award (67 local authority, 3 Dignity and 1 Westerleigh crematorium). We note that given the limited number of participating crematoria, this measure does not present systematic evidence as to the extent to which there is a quality differential between private and local authority crematoria. However, it does demonstrate that, under the scheme, many local authorities are able to achieve a high score.

Customer satisfaction surveys

75. We have also looked at customer satisfaction survey results across private and local authority crematoria to try to understand the extent to which customers report any differences in quality of service.
76. Dignity commissioned [redacted] to conduct a Crematoria Satisfaction survey across its crematoria in 2019. The survey reports that 97% of Dignity crematoria customers who responded to the survey would recommend the crematorium they used.⁵³ Memoria has received reviews across its crematoria from 2017 to date⁵⁴ where, on average, 96% of its reviews on Trust Pilot have rated its crematoria as “excellent” or “good.”⁵⁵ This is similar to Westerleigh, where across its crematoria, they have received, on average, a 99% “excellent” or “good” rating in 2018.⁵⁶

Cremation Authorities (FBCA), to help develop a more robust inspection process. [redacted] states that it “does not believe the Charter ratings provide an appropriate assessment of the overall quality of service that customers experience at crematoria. Moreover, the ratings are concerned primarily with changes in quality levels, and therefore do not represent absolute and comparative quality.”

⁵² Where we note that 390 points and above means a crematorium receives a Gold award, between 345 to 389 points means a crematorium receives a Silver award and below 344 points means a crematorium will receive a Bronze award.

⁵³ The base for this statistic is 159 consumers across 46 crematoria.

⁵⁴ As of 31st October 2019.

⁵⁵ Across 9 of Memoria’s crematoria, where this average is based on 400 reviews across these crematoria.

⁵⁶ Across 30 of Westerleigh’s crematoria, where they didn’t have data for 2 crematoria.

77. A number of local authorities provided results of customer satisfaction surveys. The results are in line with private crematoria survey results:
- (a) Belfast crematorium reported receiving “a high level of satisfaction with the facilities with the majority of people rating them as excellent or good;”⁵⁷
 - (b) Durham crematorium notes that around over 85% of respondents to its customer survey deemed the friendliness and cooperation of staff to be either excellent or good;⁵⁸
 - (c) Fife Council told us that over 95% of respondents to its customer survey were very/fairly satisfied with the presentation of the chapel, their staff’s level of respect, helpfulness and empathy and the grounds at the crematorium;⁵⁹
 - (d) Havering crematorium stated that in nine out of twelve months they conducted their customer survey in during 2018 to 2019, 100% of their customers described the service offered as good or very good, where satisfaction rates were above 85% in all other months;⁶⁰
 - (e) Maidstone crematorium stated that over 95% of respondents to its customer survey either agreed or strongly agreed with the statement “overall were you satisfied with the standard of service at the crematorium?”⁶¹
 - (f) Conwy crematorium stated that around 98% of respondents to its customer survey considered the service provided to be “excellent” or “good;”⁶² and,
 - (g) Cornwall crematorium stated that 100% of respondents to its customer survey regarded the overall standard of service at the crematorium to either be “excellent” or “good” (where over 90% reported the service to be excellent).⁶³
78. We consider that these results may have limitations. Customers are often inexperienced purchasers, may not know how to assess service standards

⁵⁷ Belfast, customer survey, November 2016, Q1, where this finding is based on 372 responses.

⁵⁸ Durham, customer survey, figure 3, where it is not specified the number of respondents that took part in the survey.

⁵⁹ Fife, customer survey, where this finding is based on 227 responses.

⁶⁰ Havering, customer survey, where it is not specified the number of respondents that took part in the survey.

⁶¹ Maidstone, customer survey, where it is not specified the number of respondents that took part in the survey.

⁶² Conwy, customer survey, where this finding is based on 198 responses to the survey.

⁶³ Penmont, customer survey, where it is not specified the number of respondents that took part in the survey.

and may have no alternative experience to compare against. Furthermore, there may be a potential reluctance amongst customers to admit that a funeral was below their expectations, given the sensitive nature of the purchase. This would cause reported satisfaction rates to be particularly high. We also observe that there is less data for local authority crematoria. This is partly because we have been told that it is “difficult undertaking customer satisfaction surveys in this type of industry” where “it isn’t always appropriate at the time when a family...has had a loss.”⁶⁴ Nevertheless, we note that despite these limitations, local authority crematoria score as highly as private crematoria in customer satisfaction surveys.

Aspects of quality that are harder to measure

79. Finally, we summarise the evidence we have in relation to aspects of quality that are harder to measure objectively such as the quality of staff and the general upkeep and ‘feel’ of the crematorium. We focus on what we have seen on site visits, what we have been told about staff by private and local authority crematoria, and what we have been told by independent funeral directors about the staff and upkeep of the crematoria that they use. This evidence relates to a small number of cases and, due to its nature, is relatively anecdotal.
80. Nevertheless, we consider this evidence illustrates that when considering aspects of quality that are harder to measure, there is no clear-cut quality differential between local authority crematoria and private crematoria.
 - *General feel and upkeep*
81. We have visited seven crematoria during the market investigation, of which four are local authority crematoria and three are Dignity, Westerleigh or Memoria crematoria.
82. Our overall view is that, regardless of the operator, the crematoria we have visited have all appeared to be relatively similar when considering aspects of quality that are harder to measure. For example, all were clean (both front of house and back of house), and have well-kept chapels, gardens and back of house facilities.
83. In our interviews with independent funeral directors, we heard the following examples of good and bad crematoria amongst local authority and private providers in terms of their general feel and upkeep:

⁶⁴ Great Yarmouth Borough Council.

- (a) [redacted] noted the differences in the general feel and upkeep of their local crematoria: “I think [a local authority crematorium] is quite nice... you look out, there is a window, and you look out on to greenery... [a local authority crematorium], which I went to as a mourner, a couple of weeks ago, "God this looks a mess". They had got labels, leaflets stuck here, posters there, this that and the other. And I thought, "Not nice;”"
- (b) A Memoria crematorium was described by an independent funeral director: “All the buildings are absolutely beautiful;”
- (c) An independent funeral director noted the range of quality at local crematoria: “all the local authority crematoria are very different. Some are truly terrible... The toilets have to be clean and well maintained... no stained carpets; no dusty flowers. Some of the crematoria were in terrible, terrible conditions. [A small private crematorium] was really bad as well;” and,
- (d) The grounds at [redacted], a Westerleigh crematorium, have been praised by an independent funeral director: “We praise the grounds at [redacted] because they are lovely.”

- *Staff*

- 84. We have been told of the importance of staff in providing a high-quality cremation service.⁶⁵
- 85. Both private and local authority providers⁶⁶ have told us that their staff hold ICCM Cemetery and Crematorium management diplomas whilst cremator technicians tend to hold FBCA cremator training qualifications. Memoria is an exception. Memoria has offered staff the chance to take an ICCM diploma, but no current staff members have taken up the offer. Memoria does not seek third party qualifications for its staff noting that they “have an extensive internal training scheme which better suits the unique way we want our staff to perform.”
- 86. We have consistent evidence across different types of crematoria providers who have made submissions that their staff offer a high-quality service. Dignity states that their “staff show clients care and commitment demonstrating what we call ‘The Dignity Way’. This describes a special

⁶⁵ For example, Mortlake, Hereford, Salford. An internal document from Dignity notes that “the real mark of quality in a crematorium is the human service they provide.” (Funerals Market Study, Final Report, Appendices and Glossary, paragraph 10, p.E4).

⁶⁶ 12 local authority crematoria have told us this in response to follow up questions around qualifications.

culture and way of working that means delivering the highest standards of service and going the extra mile.”⁶⁷ Memoria stated that “Memoria believes that its significant investment in staff, and its corresponding ability to provide a superior service, is one of the main factors that differentiates it from other operators in the market.”⁶⁸ Westerleigh states that “Westerleigh has consistently high customer satisfaction scores from its customer feedback... in particular... the attentiveness of our staff.”⁶⁹ In relation to smaller crematoria providers, we gathered evidence through seven site visits, across both private and local authority crematoria, through calls with local authority crematoria, and through interviews with independent funeral directors. We heard that staff at crematoria are, in general, helpful and look for ways to accommodate the customer’s needs. The local authority crematoria that we have visited told us that they would do what they can to accommodate the wishes of families and stressed the vocational nature of their work. Other local authorities and independent funeral directors with whom we have had telephone interviews have told us that crematoria staff are helpful and accommodating:

- (a) Conwy council told us that “the culmination of receiving service awards for the past two years was something that they (staff) are very proud of;”
- (b) St Helens crematorium told us that “a lot of funeral directors prefer to come here because we are very welcoming;”
- (c) Sefton council also told us that its staff are “very caring;”
- (d) Great Yarmouth crematorium told us that “they understand the impact they have on people;”
- (e) Bournemouth, Christchurch and Poole council stated that “most of the feedback...is always good about the staff and staff going the extra mile;”
- (f) [redacted] Crematorium, a local authority crematorium is praised for its “progressive management” and its flexibility by an independent funeral director: “They have let us take dogs in there before, picnic chairs, they have let us create the space for the family. We have arranged Saturday funerals, which they do not normally do;”
- (g) [redacted], a funeral director told us that: “[redacted] is a local authority crematorium, but it is amazing and it has got a brilliant team and they work

⁶⁷ Dignity Annual Report 2018, page 54.

⁶⁸ Memoria response to Issues Statement, page 3.

⁶⁹ [Westerleigh response to Issues Statement, page 10.](#)

transparently. And we know that when we go there, people will have a good experience;” and,

- (h) [X] made reference to [X] Crematorium, a Westerleigh crematorium. They told us that: “[X] is absolutely brilliant. The staff bend over backwards to help you.”

Evidence on the extent to which higher fees are related to higher quality

87. Dignity, Westerleigh and Memoria have argued that when making comparisons between crematoria fees we need to consider the role of quality, in particular that quality differentials may account for differences in fees.⁷⁰
88. We have considered the extent to which crematoria that offer similar slot lengths and facilities (for example, web streaming) have similar fees. We have carried out the analysis across all crematoria and also focussed on differences within Dignity and Westerleigh estates respectively.

Slot length

89. Table 4 shows the extent to which crematoria offering similar slot lengths have similar fees.

Table 4: Average standard fees by slot length by provider

<i>Slot length</i>	<i>Dignity</i>	<i>Westerleigh</i>	<i>All other private</i>	<i>LA</i>
30-minute	-	-	£760	£707
40- or 45-minute	£997	£888	£746	£731
60-minute	£912	£838	£800	£703

Source: CMA analysis of Cremation Society and parties’ data. 1 “all other private” crematorium and 36 local authority crematoria offer 30-minute booking slots. 13 Dignity, 14 Westerleigh, 7 “all other private” and 124 local authority crematoria offer 40- or 45-minute booking slots. 33 Dignity, 17 Westerleigh, 26 “all other private” and 23 local authority crematoria offer at least 60-minute booking slots.

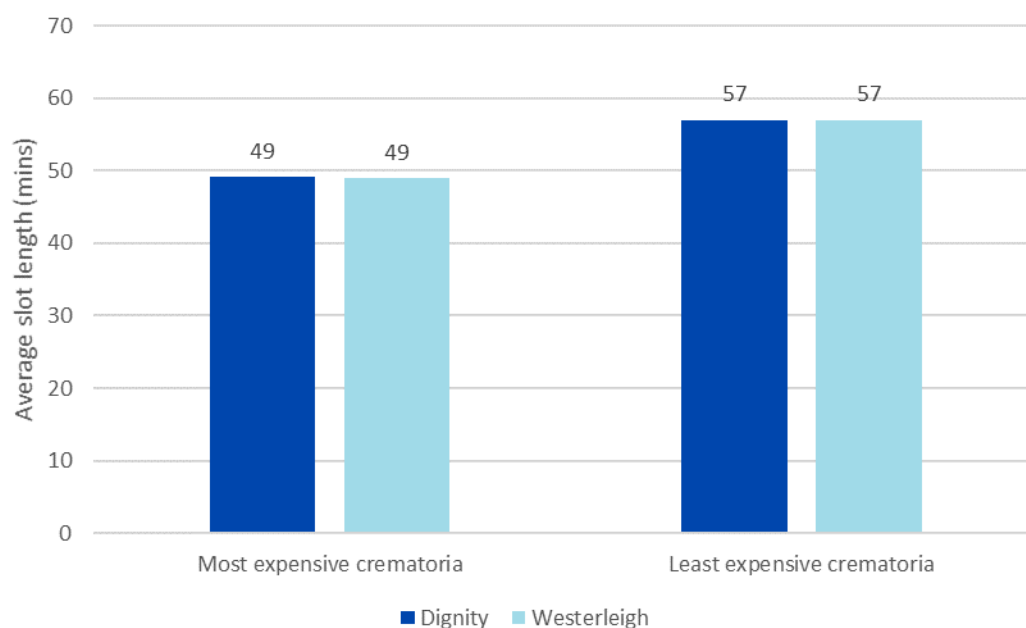
90. The table shows that, when looking at crematoria which offer similar slot lengths, there is a wide variation in the average standard cremation fee charged across providers, with Dignity charging on average the highest fee for each (applicable) slot length and local authorities charging the lowest average fee. In addition, the table shows that higher fees are not consistently associated with longer slot lengths within the same provider: on average,

⁷⁰ [Westerleigh response to Issues Statement, paragraph 6.2.4c](#). [Dignity response to Issues Statement, paragraph 3.12](#): “In considering... price differentials between suppliers, the CMA will understand the need for like-for-like comparisons. Differences between suppliers in quality and cost obligations must be taken into account to make a fair and consistent comparison between them.” [Memoria response to Issues Statement, p5](#): “there is typically a significant quality differential between new entrants and incumbents, which is reflected in prices offered.”

Dignity, Westerleigh and local authority fees are higher for 40- or 45-minute slots than for 60-minute slots.

91. We have focussed on just Dignity and Westerleigh slot lengths at a more granular level. We have compared the average slot lengths of the most expensive and cheapest Dignity and Westerleigh crematoria and found that more expensive crematoria have shorter slots.⁷¹ We have not carried out similar analysis for Memoria, since all Memoria crematoria offer 60-minute booking slots.

Figure 16: Average slot lengths at most expensive and cheapest Dignity and Westerleigh crematoria, 2018



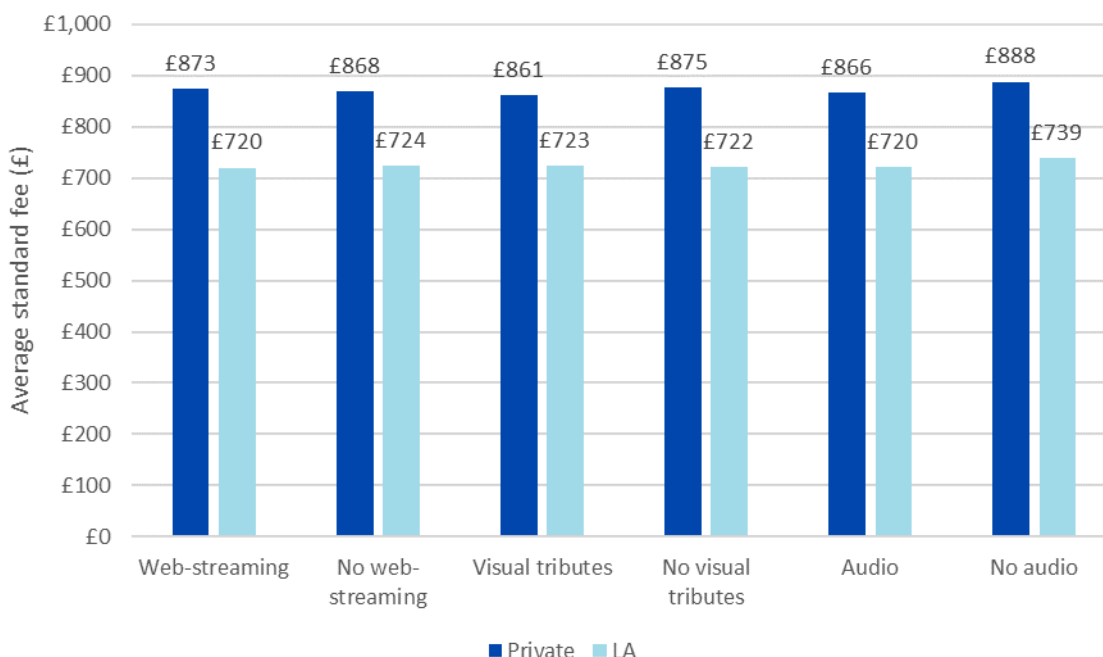
Source: CMA analysis of Cremation Society and parties' data. Where for Dignity, we have counted 11 crematoria as most expensive and 10 crematoria as least expensive. Where for Westerleigh, we have counted 15 as most expensive and 10 crematoria as the least expensive.

Availability of facilities

92. We looked at the extent to which crematoria offering a specific facility (ie visual tributes, web streaming and music systems) charge higher fees than crematoria which do not offer that facility. We looked at this, on average, across local authority and private crematoria.

⁷¹ For Dignity, we have 11 crematoria counted as most expensive and 10 crematoria counted as the least expensive. These groups are not identical since multiple Dignity crematoria, in the most expensive group, have identical fees which therefore leads to a group of larger than 10 crematoria. For Westerleigh, we have 15 crematoria counted as most expensive and 10 crematoria counted as the least expensive. These groups are not identical since, in the least expensive group, multiple Westerleigh crematoria have identical fees.

Figure 17: Average fee by availability of facilities

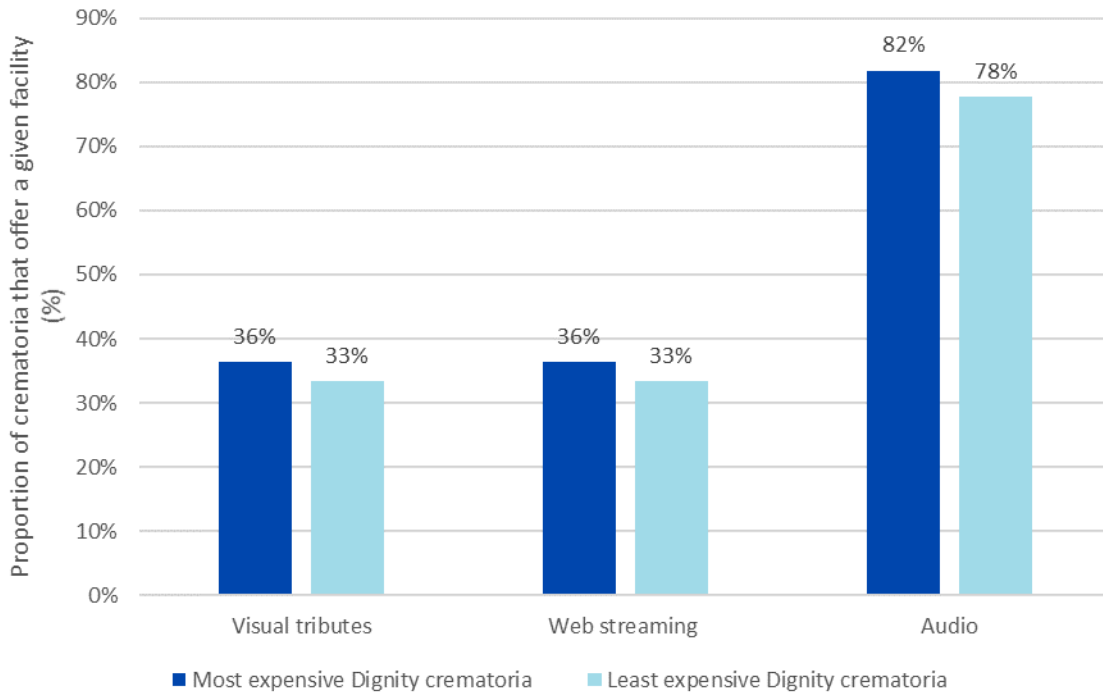


Source: CMA analysis of Cremation Society and Trajectory market research data. 55 private and 72 LA crematoria offer web streaming. 51 private and 111 LA crematoria do not offer web streaming. 59 private and 92 LA crematoria offer visual tributes. 48 private and 91 LA crematoria do not offer visual tributes. 94 private and 161 LA crematoria offer audio services. 12 private and 22 LA crematoria do not offer audio services.

93. This figure shows that average fees do not vary depending on whether or not crematoria offer particular facilities. For example, the average local authority fee and average private crematorium fee do not vary (for each type of provider) between those crematoria offering visual tributes and those that do not.

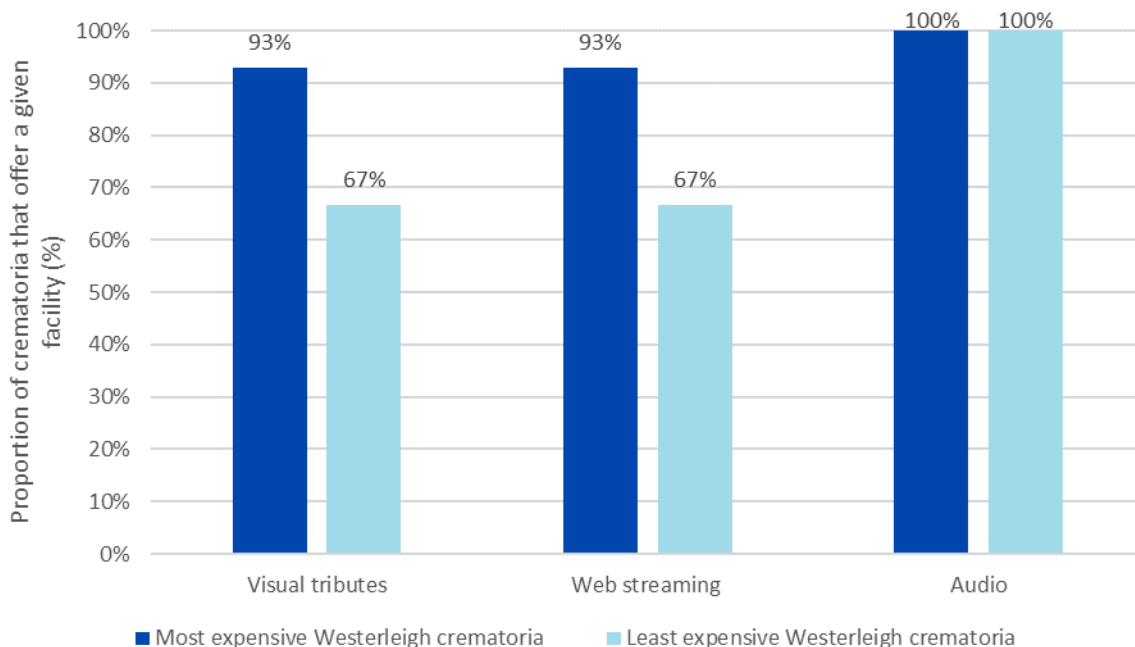
94. As above, we have split the private crematoria data to focus on the most expensive and cheapest Dignity and Westerleigh crematoria, the results of which are below. Cheaper Westerleigh crematoria are less likely to have visual tributes and web streaming compared with more expensive Westerleigh crematoria, but there do not appear to be any significant differences at expensive and cheap Westerleigh crematoria in terms of music systems and in terms of all facilities at expensive and cheap Dignity crematoria.

Figure 18: Availability of certain facilities at most expensive and cheapest Dignity crematoria



Source: CMA analysis of Cremation Society and Trajectory market research data. For the most expensive Dignity crematoria, we have data on 11 crematoria. For the least expensive Dignity crematoria, we have data on 9 crematoria. Of the most expensive Dignity crematoria, 4 offer visual tributes, 4 offer web streaming and 9 offer audio services. Of the least expensive Dignity crematoria, 3 offer visual tributes, 3 offer web streaming and 7 offer audio services.

Figure 19: Availability of certain facilities at most expensive and cheapest Westerleigh crematoria



Source: CMA analysis of Cremation Society and Trajectory market research data. For the most expensive Westerleigh crematoria, we have data on 14 crematoria. For the least expensive Westerleigh crematoria, we have data on 9 crematoria. Of

the most expensive Westerleigh crematoria, 13 offer visual tributes, 13 offer web streaming and 14 offer audio services. Of the least expensive Westerleigh crematoria, 6 offer visual tributes, 6 offer web streaming and 9 offer audio services.

‘Within Dignity’ comparison

95. We have also carried out an analysis for Dignity, given the wide variation in its fees among its crematoria (Westerleigh and Memoria do not have such a degree of variation in their fees) to understand whether more expensive Dignity crematoria offer a wider range of facilities and longer slots compared with cheaper Dignity crematoria. In 2018, the cheapest Dignity crematorium had a standard cremation fee of £633 whilst the most expensive Dignity crematoria charged £1,070.⁷²
96. We have assessed whether Dignity crematoria offer any combination of four aspects of quality: 60-minute slots, visual tributes, music systems and web streaming. Table 5 shows that many of the Dignity crematoria in the highest price band do not offer all four of these facilities. A similar proportion of Dignity’s most expensive crematoria offer all four features compared with Dignity’s cheapest crematoria. There does not appear to be any correlation between the availability of these facilities and prices, therefore.

Table 5: comparison of quality metrics at Dignity crematoria, by fee level, 2018

	<i>Number of Dignity crematoria</i>	<i>Number offering two or fewer features</i>	<i>Number offering three features</i>	<i>Number offering all four features</i>
Less than £800	7	4	2	1
Between £800 and £900	7	3	3	1
Between £900 and £1000	17	8	3	6
Over £1000	14	10	2	2

Source: CMA analysis of Cremation Society and Trajectory market research data

Qualitative evidence

97. We briefly outline the qualitative evidence that we have obtained around the correlation between quality and fees. Our evidence is based on site visits, and comments about the relative quality of crematoria by independent funeral directors, which provides us with some illustrative examples. In particular, we have received comments about expensive crematoria that do not offer particularly high quality.
98. Above, we have compared Dignity crematoria with each other. We have received the following comments from independent funeral directors that a

⁷² The variation in Westerleigh with fees of between £695 and £945.

number of the most expensive Dignity crematoria (all currently charging more than £900 for a cremation) do not offer a particularly high level of quality:

- (a) “They took ages to install the downloading music system whereas other crematoriums all over the country had them, the non-Dignity ones, because they are expensive to install... I think they have just been so complacent and that is why they have just let it go and go and taken the money.”
- (b) “Then you have the private-run Dignity crematorium at [redacted] which is over £[redacted]. In my opinion, and many people’s opinion, when you compare the two, the Dignity crematorium is pretty awful, to be quite honest with you, in terms of its look and its presentation.” Another funeral director noted that [redacted] was “drab.”
- (c) “Dignity have got [redacted] as well; just extortionately expensive and no better than the local authority crematoria.”

99. We note these comments are consistent with a document from a third party: “Dignity’s approach to these sites [redacted] has been not to invest heavily... but rather to run them as utilities, charging as much as they can get away with, given they are mostly the incumbent in the area they serve.” The document also acknowledges that “there is little doubt that their (Dignity’s) customer experience... would benefit from a refurbishment of... half of their estate.” Dignity has told us that the document does not in any way reflect the true investment and commercial operations of Dignity sites.

100. We have also obtained evidence from site visits that crematoria with low fees can offer a high-quality service. For example, Mortlake Crematorium, in West London, is among the cheapest crematoria in the UK, ranking 286th out of 299 in the Cremation Society’s fee table for 2019 with a cremation fee of £610.⁷³ Mortlake is a crematorium operated as a venture between four local authorities.⁷⁴ Mortlake provides a good example of high quality being offered at a low fee. Slot lengths at Mortlake last 40 minutes (close to the Dignity recommendation of a 45-minute slot),⁷⁵ with a double slot available for an additional £300. It has a one-way system to prevent mourners attending different services coming across one another. It has attractive gardens and a riverfront setting. The crematorium is clean and well kept, both front of house and back of house. It has a light, art-deco style chapel. The crematorium offers web streaming (and plan to install visual tribute screens that are in

⁷³ <https://www.cremation.org.uk/content/files/2019%20Cremation%20Fee%20League%20Table%281%29.pdf>

⁷⁴ <https://www.mortlakecrematorium.org/history-and-the-board/>

⁷⁵ Dignity: Cost, Quality, Seclusion and Time, p3

keeping with the art deco décor). The staff were friendly and accommodating and described the initiatives they undertake to offer a high-quality service to their customers (for example, they try to accommodate specific customer requests, and pay special attention to the needs of young mourners to try to put them at ease). The staff work in the community to build awareness of social issues in organising funerals (such as LGBTQ funerals, dementia awareness, and baby loss awareness) and have worked to design their own, more attractive, ash storage boxes. We have visited other local authority crematoria offering similar levels of service below the average cremation fee.

Evidence on the extent to which quality varies with the presence of a rival

- 101. We have considered whether certain measures of quality (slot length and availability of web streaming, visual tributes and music systems) vary depending on whether they have a rival within 30-minutes.
- 102. In relation to slot length, local authority crematoria with an alternative within 30 minutes have average slot lengths of 42 minutes, whilst those without a rival within 30 minutes have average slot lengths of 43 minutes. For private providers this is an average of 56 minutes for those with a rival within 30-minutes and 55 minutes for those without a rival within 30 minutes.⁷⁶ There does not therefore appear to be a material difference in slot length depending on the proximity of the closest rival at both local authority and private crematoria.
- 103. In relation to the availability of facilities, such as music, web streaming and visual tributes the proportion of crematoria which have these facilities does not vary materially depending on whether or not the crematorium has an alternative within 30-minute cortege drive time or not. Table 6, below, shows this.

Table 6: Availability of different types of facility at crematoria who face a rival compared to those who don't

<i>Type of facility</i>	<i>Competitor within a 30-minute cortege drive time</i>	<i>No competitor within a 30-minute cortege drive time</i>
Web streaming	43%	45%
Visual tributes	53%	51%
Audio services	91%	86%

⁷⁶ We note that the degree of local concentration may be inversely related to the level of local capacity, which may in turn affect the slot length providers are able to offer. It is therefore not clear that any longer slot length in less concentrated areas could be attributed to stronger competition, or to higher capacity which allows providers to offer longer slots.

Source: CMA analysis of Trajectory market research data and CMA drive time analysis. The number of crematoria for which we have data on web streaming is 289, the number of crematoria for which we have data on visual tributes is 290 and the number of crematoria for which we have data on audio services is 289. Subject to whether we have data on different types of facility, of those 144 crematoria that have a competitor within a 30-minute drive time, 62 crematoria offer web streaming, 76 offer visual tributes and 130 offer audio services. Likewise, of those 146 crematoria that do not have a competitor within a 30-minute drive time, 65 offer web streaming, 75 offer visual tributes and 125 offer audio services.

Summary

104. We have not found widespread issues relating to the quality of crematoria, either front of house or back of house. However, we have received some evidence that there are quality issues in the provision of crematoria services. This evidence is relatively anecdotal and is mainly based on observations by crematoria operators and funeral directors relating to the quality of services offered by crematoria in their local area.
105. Our analysis of quality outcomes has focussed on:
 - (a) Evidence on the extent to which private crematoria offer higher quality services compared with local authority crematoria;
 - (b) evidence on the extent to which higher fees are correlated with higher quality; and,
 - (c) evidence on the extent to which quality varies depending on whether or not the crematoria faces a rival within 30 minutes.
106. We have found that on some measurable aspects of quality (for example, slot lengths and availability of certain facilities, eg visual tributes) private crematoria, are, on average, higher quality compared with local authority crematoria. We also note that, based on the same metrics, newer crematoria (which are mainly private crematoria), are, on average, higher quality compared with older crematoria.
107. Qualitative measures of quality, including reports from the Scottish Inspector of Crematoria, customer satisfaction surveys, and interviews with crematoria and independent funeral directors do not provide clear cut evidence that there are quality differentials between crematoria depending on whether the crematoria are operated by private providers or local authorities.
108. Our analysis based on some measurable aspects of quality has not found evidence that more expensive crematoria consistently offer a higher quality services compared with cheaper crematoria, nor that quality varies depending on whether the crematorium faces a rival within 30 minutes or not.