

COMPETITION AND MARKETS AUTHORITY (“CMA”)

FUNERAL MARKET INVESTIGATION

BOURNEMOUTH CHRISTCHURCH AND POOLE COUNCIL

WRITTEN RESPONSE TO WORKING PAPERS ISSUED 30.01.2020

1. This Response is made by Bournemouth Christchurch and Poole Council (the “**BCP Council**”) in its capacity as a bereavement services provider, in particular, as a public sector operator of crematoria.
2. The BCP Council’s response at this stage is principally focused on the CMA’s market investigation working papers issued on 30th January 2020.
3. The findings of the BCP Council’s own consultation, local feeling and experience is broadly aligned with the findings outlined in the CMA’s working papers. As a public sector operator of crematoria we are not able to comment directly on the findings regarding the funeral business delivered to families through funeral directors. However, the BCP Council is of the opinion that the influence of the funeral director at ‘point of need’ is focused mainly on price but not the family’s need of having best quality service. Funeral directors will influence the family’s decision and may steer them to opt for more expensive choices when making arrangements. Due to the highly emotional state of some families challenging the funeral director on price will be of little priority to them at the time of contract agreement. The high cost of a funeral does not necessarily mean the family will get a quality service resulting in dissatisfaction and possible complaint with the crematoria also being tainted in the process. This in turn will impact on the family’s mental wellbeing and grief recovery and lead to non-recommendation of services provided by the crematorium.
4. The BCP Council also believe that the funeral director as first point of contact for some families following a death may exert some influence on the choice of crematoria for reasons associated with functionality, geography and personal feeling. This reinforces the CMA’s finding that funeral directors do not always inform the families of the available crematoria options or the crematoria best suited to the family’s needs.
5. The BCP Council are supportive of having funeral director services being regulated by law in order to ensure best practice and quality services are delivered to all families and to the deceased when taken into their care. The BCP Council is aware of anecdotal information regarding ‘poor’ practices undertaken by funeral directors which do not align with the values and level of care crematoria provide. This in turn can have a negative connotation on the services provided by the crematorium.

6. The BCP Council concur with the CMA's findings that a death referred to the Coroner will influence the choice of funeral director for families through the Coroner's appointment of a funeral director for the removal and collection service. The BCP Council believe that the Coroner Service as a judicial service funded by the local authority, should comply with the local authority procurement procedures and financial regulations. This would enable a fair appointment for the removal and collection contract arrangement with strict terms and conditions required in relation to the behaviour of the funeral director awarded the contract.
7. Reference is made to the three largest private crematoria operators (Dignity, Westerleigh and Memoria). However there is no mention of crematoria that is owned and privately operated by a company that also delivers a competing funeral director service to the local area, a situation that is perhaps unique to the BCP Council. The competing crematorium only allows bookings at their facility to be made as part of a 'funeral package' undertaken through one of their funeral director branches. This has led to other local funeral directors (both group and small independents) losing business as a result of not being able to offer the family a cremation service at their preferred choice of venue. The BCP Council believe that comparisons in this arena might be worth considering in view of the impact that this unique situation has had on local funeral directors and on neighbouring public sector operated crematoria.
8. The BCP Council feel that the demographic of the local area does not fully align with the model findings in the working papers. It may be worthwhile considering assessing differing models that have a high population within the 60+ age group together with in-migration of older age groups following retirement. The CMA's findings are based on cities where there is a widening demographic which may attract less competition, whereas some areas attract more competition due to its aging population.
9. The lack of transparent pricing by funeral directors is not good practice and the BCP Council support the recommendation for clearer pricing options to be made available. There is no mention in the working papers of available resource for families to compare funeral prices such as www.yourfuneralchoice.com.