

---

# Harbour

We agree with the CMA's initial assessments and feel the funeral sector is in dire need of scrutiny. We understand the need to focus on funeral directors. The vast majority of crematorium operators provide an acceptable level of service. However we still feel the barriers to entry in terms of planning requirements for new crematoria operators should be lowered to allow more robust competition which, as the CMA's study has proven, leads to improved services and lower prices for the consumer.

We feel an outcomes-based regulatory model would be appropriate for the funeral sector given the vast array of different offerings the sector must provide for different cultures and religions. A broad set of guidelines for the whole sector would make the regulatory body more effective too.

We feel a new, truly independent body should regulate the industry. Larger funeral firms have traditionally held major roles in trade bodies and have used their influence to skew rules in their favour. We note, with some skepticism, the same parties setting up additional trade groups with the hope of once again becoming the industry regulators, despite a track record showing them to be the most frequent offenders when it comes to poor standards.

Although we operate a direct cremation service, we feel all funeral firms should have access to refrigerated storage. This is due to the fact that complications can arise with statutory cremation paperwork at the crematorium, therefore there is always the possibility that cremation could be delayed. However this possibility will be somewhat diminished as the medical examiner role becomes more commonplace throughout England & Wales.

We suggest that a single refrigeration room could be appropriate providing the following conditions are met:

- The deceased are separated via individual shelving and/or trays within the refrigeration room. This would allow airflow between compartments but maintain appropriate spacing.
- All bodies are kept within sealed body bags or shells with appropriate identification tags.
- Refrigeration rooms should have 2 or more refrigeration units to ensure redundancy.

We also suggest that redundancy should extend to electrical power generation for all refrigeration equipment to minimise potential issues in the event of a power outage.

We feel professional experience is an important aspect of any training requirement, but it should be supplemented by exams to ensure all participants are aware of up-to-date regulations and industry best practices. We suggest this should take the form of ongoing CPD for all industry members. We feel this would best be managed by the same independent body that should regulate the funeral sector as it could serve as both accreditation and regulation.

We feel this body should regulate both individuals and businesses. With individuals being required to take regular tests to renew their accreditation. Businesses could be required to sign up to a code of best practice, a customer complaint resolution process, prove staff are accredited, and agree to random spot checks; We feel random spot checks would give a much clearer view of day-to-day operations than annual reviews. This accreditation body could fund itself via examination renewal fees for individuals.

We fully support the requirement for funeral directors to make their prices public. This should include typical disbursements and a breakdown of individual components. We note the excellent work of the Fair Funerals Pledge to this cause. We suggest a government-promoted platform to collate this information is appropriate and we hope it would receive sufficient funding to ensure consumers are fully aware of it.

The requirement to allow consumers to switch funeral directors without incurring a financial penalty would be welcomed. We suggest the cap on this charge should be calculated by taking an average of current coroner collection prices. This would ensure a fair price and hopefully discourage the practice of underbidding on coroner contracts to drive sales. We suggest a fixed price is used rather than a daily charge, as a daily fee could cause the bereaved to enter a troubling cycle of being unable to pay for the funeral or an increasing release fee as each day passes.

One point we would like to note is that this release fee should only be applied after the deceased has entered into the funeral director's premises. We are troubled when we hear from mortuary staff about certain funeral directors leaving the deceased in public mortuaries for a prolonged length of time while simultaneously telling the family that the deceased is in their care.

We support all remedies to bring more transparency to the funeral industry including disclosing any commercial arrangements between funeral firms and third parties to consumers. This should include hospices and nursing homes. We also note the increasing trend to use funeral arrangement as an opportunity to promote a probate service to the bereaved and suggest this should be included in any financial disclosure requirements to the consumer.

We note that 31 local authorities either already run their own funeral service or are planning to. While we support tendering the opportunity to operate a simple funeral service to funeral companies, we are troubled by certain local authorities who have set up their own in-house funeral firms. These firms have an unfair advantage over local funeral directors since the local authority receives a profit from both the funeral arrangement and the cremation fee. Given current planning rules restrict the construction of competing crematoria, and the fact that the same local authority would have to grant planning permission to a new operator, we feel this creates a conflict of interest that should be addressed.