



## **SAIF Independent Funeral Directors**

### **Response to the CMA Papers on regulating price on Funeral Directors services – 12 June 2020**

#### **Introduction to the context**

One of the SAIF CMA Taskgroup members sums up the vocational role of working as a local funeral director, from a multi-generational independent funeral home that is committed to serving the local community, no matter the circumstances:

*“Like many Independent family Funeral Directors, I have always viewed good service as the number one priority of my business, going over and above what would be deemed acceptable to help bereaved families come to terms with their loss. Our profession is unique being so service orientated. Trust and reputation locally is still the biggest factor why families chose a Funeral Director”.*

Jeremy West, West & Coe, Essex

It is vital that throughout the CMA investigation that this component of service orientation and professional standards of quality are measured as well as the financial analysis and pricing within the investigation.

SAIF does not dispute some of the pricing concerns. There have been some funeral operators in the recent decades that have increased their charges far higher than inflation, but importantly, and significantly there are third party service providers, from crematoria and burial grounds, to doctors and ministers and celebrants, some of whose fees have risen exponentially far higher than funeral director fees.

There has been much misunderstanding in the mass media, about funeral director fees, since the disbursements are paid on behalf of the customer and therefore, the average total funeral invoice includes disbursement fees that make up between 45-65% of the total invoice.

In April 2020, in the middle of the Coronavirus crisis one Crematorium put their charges up by 8% having two years earlier increased them by 15%. Unfortunately, such increases are put on the Funeral Directors account, which has only helped to fuel the concept that funeral charges “have risen substantially in recent times.”

The British funeral profession has many family Funeral Directors and people who go well beyond what is expected to help bereaved families regardless of what profit they make. This fact should be acknowledged, as we certainly do not want to lose that special service in return for an accountants balance sheet approach to cut service to reduce cost.

SAIF accepts that part of the funeral profession has not adapted to the new world of digital, including online pricing. SAIF is committed to calling all members to display an agreed set of prices online. In doing so, we still believe that organising a funeral, to ensure it meets the clients wishes, requires that person to person arrangement meeting.



Similarly, planning a wedding event, requires more than an internet purchase. It requires a personal discussion to ensure even a basic wedding has a bespoke element. The significant difference for the funeral profession, is the care of the deceased. The human respect afforded to the deceased to be handled with honour and care, and a fitting service to mark the end of their life.

SAIF accepts that there is work to educate the public on funeral choices and service fees. In fact, with the Funeral Services Consumer Review Group (FSCSR) moving toward what will be the first unified Code of Practice across the UK, this gives us the chance to build a communications strategy among the trade associations, government departments and media with explaining funeral choices and fees. But, let us not forget that death is remains a taboo subject for the vast majority of British citizens.

Notwithstanding, consumers are much more knowledgeable than before. Customers are much more aware of their consumer rights and we have seen across retail and professional services, the facility for customers to have rights for redress and complaints through various complaint protocols. Even within the British funeral sector, customer complaints are approximately less than 400 per annum through the trade association channels, and even if one includes an estimate of complaints to trading standards and consumer associations, it would still fall below 600 complaints per annum, which amounts to less than 0.1% of the total number of funerals per annum. That is not an argument for compliancy, rather perspective on what remedies are appropriate and proportionate to the funeral sector.

Consumers are far more knowledgeable than ever before. Today we have the Disposal service, Direct Cremation, Basic Funeral, Traditional and many other titles. There is, without doubt far more competition than ever before.

However, we need to be wary of measuring types of funeral services to customers on price. We in SAIF have seen companies with no premises carry out very basic funerals at very low charges. A closer inspection of the practices used by some of these companies would highlight issues no one would be proud of. The deceased is not stored in a well-equipped mortuary with refrigeration.

Standards and service are paramount to our profession and people have the right to make that choice. If I take my partner out for a meal, I could go to McDonalds or a plush restaurant, like the Ivy or the Savoy in London, when I get the bill and pay several hundred pounds more, do I think, how can they justify that, no I appreciate I have value for money and accept the big difference between the two. I make that choice. The expression comparing apples with apples is very relevant here.

Therefore, SAIF will pursue online pricing. We can explore using professional images of our back offices, mortuary spaces, detail the qualifications of staff and the Codes of Practice we adhere to.

In 1987 before SAIF was formed, recollection of one member in the London Association of the NAFD, remarked how the the Office of Fair Trading (OFT) commissioned a report into



funeral profession. The outcome of an OFT Survey showed 97% of families (customers) were satisfied with their experience. What other trade or industry could boast of that?

Another outcome of the report was also a set specification of a basic funeral which all NAFD members had to offer to each bereaved family. It worked fine, but with no agreed cost.

We have seen in recent times the large funeral firms reduce their funeral price, to £1,950.00 including a Limousine. A reduction to their normal charges by some several hundred pounds.

Did they get acquire more customers through this? The early evidence is that they have not gained greater market share against the independent sector.

What does the CMA think of such a reduction and the consumer not choosing this option? It is quality of service, reputation and listening to the needs of the customer that local independent funeral directors remained known for.

Finally, SAIF is committed to working with the CMA, for a proportionate solution to evidential problems, and it is paramount that consumers can make informed choices, that funeral directors are transparent at a distressing time and offer the full details of funeral services.

### ***Our current thinking***

59. Our current thinking is that a maximum price would be applied to a defined benchmark package of funeral products and services. This benchmark package would be required to be offered by all funeral directors in the sector who are subject to the price control regulation.

60. Table 1 (shown below) describes some possible elements which could be included in a benchmark package. We consider that these are the most commonly purchased funeral products and services. We would welcome views on this proposed benchmark package, in particular:

(a) Are there are any products or services which are not currently included in the suggested benchmark package (Table 1) which should be included? What is the evidence to support this view?

**None.**

(b) Are there are any products or services which have been included in the suggested benchmark package (Table 1) which should not be included? What is the evidence to support this view?

**The first thing is to note is that the CMA 'Basic funeral' content of services would be equivalent to SAIF's expectation of a 'Standard funeral'.**



However, SAIF's nearest equivalent in the Basic funeral is the Simple funeral as per in the SAIF Code of Practice '*Simple (Basic) Funeral*'. The following would not be included in a Simple funeral, therefore, we would not include the following in a Basic funeral.

- Viewing of the deceased.
- Travel distance and time on a funeral element would have limits.
- Limousine for the clients.
- Embalming of the deceased.

(c) Do you consider that there is evidence to suggest a lower or declining demand for any products or services in the suggested benchmark package, in particular we seek views on the use of limousine/s and embalming?

SAIF's Code of Practice *Simple (Basic) Funeral* excludes a limousine and embalming treatment.

During COVID-19 limousines have not been used and the jury is out whether this will continue with changing consumer behaviour after the national restrictions of social distancing rules.

(d) What is your view on including or excluding time-based restrictions on certain services, for example should collection, transportation of the deceased be available 24 hours a day, seven days a week or should viewing of the deceased at the place of storage/funeral director's premises be limited to "office hours" such as 8am to 6pm. Also, should there be any restrictions on the route for the funeral procession?

A simple funeral is a baseline service provision to keep clients costs to a minimum, whilst offering the highest quality of care for the deceased in the mortuary and care to the family funeral arranger.

Independent funeral directors will transport the deceased into their care 24/7.

Most SAIF members do not offer viewings within the cost of a Simple funeral, these are charged for separately. If viewings were to be added to the baseline funeral, those that offer this, do so within working hours, 9am to 5pm, Monday to Friday.

There needs to be legitimate restrictions on the funeral route especially in remote locations in the UK, and agreed extra charges when a funeral takes the hearse beyond the 15 or 20 mile distance to the funeral service, otherwise this penalises the funeral home in isolated locations.

The route direct to the funeral service is the norm for the Simple funeral.

(e) Are there any funeral director providers for whom the suggested “standard” benchmark funeral package (Table 1) would not be a suitable product/service to offer, for example a funeral director offering highly specialised or unique services?

Muslim funerals.

Direct cremation companies, who only offer a pick up and drop off disposal service.

18 Table 1

Suggested benchmark funeral package for consultation

- Collection and transportation of the deceased (no time restrictions)
- Storage of the deceased Care of the deceased
- Customer advice and support (may also be referred to as funeral director contact)
- Legal and administrative services (including completing required documentation, liaison with third parties such as coroner)
- Managing arrangements relating to burial, cremation, cemetery, church, ceremony officiant
- Date and time flexibility for funeral service
- Arranging payment of third-party disbursements
- Viewing of the deceased (suggested during the hours 8am-6pm)
- Dressing the deceased in their own clothes or gown
- Provision of a ‘standard’ coffin
- Provision of hearse and personnel
- Choice of route for funeral procession (within defined radius)
- One limousine
- Embalming

(f) We are also considering whether an alternative approach, in particular a cap on average revenue per funeral, could be effective in addressing any AECs and customer detriment, whilst also addressing unintended market distortions such as the risk of a focal point for prices. Do you think this could be a better approach for price regulation?

We do not support price regulation, nor a cap on average revenue per funeral since this method does not allow for the breadth and range of funeral directors and the different business models used. It could have a detrimental effect to small to medium sized independent funeral directors, and actually have a reverse effect of impeding competition, with funeral firms remaining in the market, many of whom have long been serving their local communities.

The issue of making “excess profit or profiteering”. We don’t see how a formula can be found to solve this. One could say that a one person disposal service with a van, no premises or overheads, charging some £800.00 a funeral is making more than is seen as a reasonable profit.



Equally are the corporates funeral firms making excessive profit at the moment even by charging several times that amount?

Should the the established family private business which runs very efficiently, that offers a high standard of service at just below average charges, be penalised?

We cannot see a one-sized fits all solution to this with such a fragmented model of businesses and different customer options and preferences. Independents have different pricing strategies and how they incorporate these within their services to customers.

If a price regulator was to be mandated it needs to:

1. Include regional differences
2. Exclude disbursements as part of the funeral director's price control.
3. Disbursements also need to be subject to price regulation.

### **The CMA summary**

In summary, and for the reasons set out in the rest of this paper, our current thinking is that if implemented, a price control remedy:

(a) Is likely to apply to all providers of funeral director services in the United Kingdom (UK) (paragraph 38);

(b) is likely to apply a maximum price to a defined 'benchmark' package of funeral products and services (paragraph 59);

(c) could exclude disbursement costs, albeit potentially with an obligation to pass these costs onto customers without a mark-up/profit margin added (paragraph 57);

(d) would be set by reference to available pricing data for comparable products and services provided across the UK (paragraph 61);

(e) would be accompanied by a recommendation to government for the establishment of a new regulator which would eventually assume responsibility for any price control regulation (paragraph 84);

(f) would initially be implemented through the CMA's order-making powers. We are considering whether price controls overseen by the CMA should be introduced on a time-limited basis as a transitional measure, for example until a new regulator is put in place (paragraph 86)

We would welcome views on the proposals outlined in this working paper and any other comments on the proposed price control remedy. In particular we would welcome comments on the following questions.

### **Invitation to comment on this proposed remedy**

101. We would welcome views on the proposals outlined in this working paper and any other comments on the proposed price control remedy. In particular we would welcome comments on the following questions.

Aims and approach of a price control remedy.

- (a) Do you agree that the introduction of a price control likely to be an effective solution to remedy any AECs and any resultant, or expected, detrimental effects on customers should they be found in this market investigation?

SAIF does not support a *Price Regulator*, the funeral services market has adjusted in recent years. Customer behaviour and inquiry has developed rapidly in the last few years, with inquiries about price and service options. However, there is room for quality of standards, including premises to be developed among consumers.

Independents' have been consistently offered best value to the consumer over the past decades through various independent consumer reports.

The AEC to the consumer with the price regulator is that someone has to subsidise the price regulator, and ultimately that is either the consumer, or the funeral home. If it is the latter, with Independents' already best value, this will be detrimental to the viability particularly of the micro and small private funeral homes. Or the consumer pays for the regulator fees through the funeral invoice.

- (b) Do you agree that the introduction of a price control remedy to be a necessary and proportionate solution (paragraph 19) to remedy any AECs and any resultant, or expected, detrimental effects on customers should they be found in this market investigation?

SAIF does not support a price regulator as a solution it would need to be a highly precise and a differentiated approach to a fragmented model of business operations without damaging the independent sector which conducts over 70% of 'at-need' funerals in the UK.

Also, quality of service is paramount to SAIF, therefore, this needs to be addressed by the CMA:

- quality of service,
- care of deceased,
- funeral homes facilities, including mortuaries and equipment,



- education and qualification of staff.

We acknowledge that online price transparency has been lacking. There are reasons for this. The first is that some funeral directors are late adopters of modern technology, with fax machines evident in most offices. However, that is fast changing and SAIF will endorse that members as part of a Code of Practice revision will need to provide online price transparency to consumers (this has been delayed with the stalling of the FSCSR review due to the coronavirus pandemic and the inevitable delay to a Special General Meeting of SAIF which was planned for May 2020 to institute these changes). The second is the taboo of death planning in the UK, as a major factor to avoid such discussion and planning among consumers.

#### Price control design considerations

- (c) Do you agree that all funeral directors should be subject to a price control remedy (paragraph 38)?

No

- (d) Do you think there is a requirement to limit the application of any price control regulation to exempt certain providers and if so, what should the criteria for exemption be (paragraph 39)?

Exemption to independent funeral directors, who have consistently offered over the past decade the lowest fees to consumers.

- (e) Do you agree or disagree with the suggestion that a maximum price could be applied to a benchmark package of products and services (paragraph 59)?

The consumer has become more aware of choice and unafraid to ask questions around cost and emerging questions on quality of the back office. We do not believe the modern consumer is unable to make a discerning decision, despite the distress they may face.

The majority of independent funeral directors have reduced their fees during the coronavirus due to restricted services.

We are not aware of crematoria reducing their fees with reduced service times to expedite the volume during the pandemic.

- (f) Do you agree with the suggested products and services within the proposed “standard” benchmark funeral package (paragraph 60)?

Embalming and Limousines should not be included.





Many small Independents do not provide these within their own business and have to buy them in. The cost of this is normally higher than those funeral directors who own limousines and employ embalmers. In many parts of the Country there is a lack of embalmers to carry this work out so it is not always possible to provide this service.

The supply of the Hearse should have a mileage restriction. In remote areas the funeral may have to travel a considerable distance for a cremation. E.g. North Scotland may require a 200-mile round trip. It is unreasonable for this to be supplied for a restricted price funeral. Storage of deceased should also be restricted to a time limit. It is unreasonable to require an funeral director to store a deceased for an unlimited time.

What is meant by 'Care of the Deceased?'

Whilst it may be okay for funeral directors to arrange for the payment of disbursements however, these should be paid for in advance or paid directly to the supplier. Also, there needs to be a restriction on the number and type of disbursement or a funeral home could face having to arrange and include all sorts of supplies. E.g. hotels, pipers, buses, and numerous flowers. They should be restricted to what is absolutely necessary i.e. Crematorium/Cemetery charge, immediate family flowers; Celebrant/Clergy fee; Doctors cremation papers (Not applicable in Scotland).

An alternative cap on average revenue would need to be applied to each individual funeral company as the cost of operating varies significantly. How would this apply where one funeral director is operating with full services on the premises, vehicles and staff whereas another is operating from home with no facilities and staff, hiring them in and describing them as disbursements. The profit in the latter may be considerably higher. Also, it may have the effect of increasing the price of many businesses as they could currently be charging under any applied cap.

- (g) Are there any funeral director providers for whom the suggested "standard" benchmark funeral package (paragraph 60(e)) would not be a suitable product/service to offer, for example a funeral director offering highly specialised or unique services?

Muslim funeral directors.

Direct cremation companies that do not offer mortuary, nor care of the deceased services. For the latter, there is detriment to the deceased not being washed, nor dressed and stored in a professional and caring environment.

- (h) Do you consider that there is evidence to suggest a lower or declining demand for any products/services in the suggested benchmark package, in particular we seek views on the use of limousine/s and embalming (paragraph 47)?



Many funeral directors do not provide embalming except in circumstances that require it. This keeps the cost down for their client and they use refrigeration as an alternative.

- (i) What is your view on including or excluding time-based restrictions on certain services, for example should collection, transportation of the deceased be available 24 hours a day, seven days a week or should viewing of the deceased at the place of storage/funeral director's premises be limited to "office hours" such as 8am to 6pm. Also, should there be any restrictions on the route for the funeral procession (paragraph 60(d))?

There should be a restriction on time of transfer as work out of hours and at weekends normally incur additional staff payments.

We agree that viewing should be within normal office hours, 9am to 5pm, however, this needs to be by appointment only.

See comments above regarding hearse route.

- (j) Do you consider that we should include a requirement for cost reflectivity for all disbursement costs within any price control regulation? If not, are there particular disbursement costs, for example cremation costs, which should be included (paragraph 57)?

It is not unreasonable for a small charge to be made where a funeral director is paying for disbursements and waiting for these to be paid as long as it is transparent and the client is fully aware. However, the majority of funeral firms simply pass on the disbursement fees, with no administration fee.

The consumer has the option of paying for these themselves, in advance or accepting the small charge.

However, it should not be incumbent for the funeral director to pay for these on the client's behalf.

Each funeral director should be allowed to determine their own trading terms and conditions as long as the client is made fully aware of what they are.

A key issue is that disbursements should not be apportioned as part of the funeral directors' charges. The highest price rises over the last decade has been in disbursements, with significant increases for cremation's, which have ranged from 5 to 25% annual increases by crematoria.

Funeral directors have borne the criticism unfairly by the media, for these rises in disbursement fees, when they have no control whatsoever over these.

If a price regulator were introduced, it should segment responsibility between the funeral home and the third party disposal provider.

- (k) Alternatively, do you think that price control cap on average revenue per funeral, would be as effective in addressing any AECs and customer detriment, whilst also addressing unintended market distortions such as the risk of a focal point for prices (paragraph 60(f))?

An average price control could have a reverse effect on competition by impinging on different business models and impede the small to medium private funeral home.

- (l) Do you think the same approach to the design of a price control is required across the UK, or whether there should be any variation at a regional or devolved nation level (paragraph 69(a))?

It should at the very least be on a devolved Nation basis to recognise the different cultural differences. It could also be argued that it needs to be Regional, again to recognise differences in culture and also cost of operating. E.g London or City premises as opposed to small village or town.

- (m) Do you think that one maximum price should be set for a benchmark package across the whole of the UK? Alternatively, what are your views on setting different regional or devolved nation prices (paragraph 69(b))?

With quite varying differences in cost it is difficult to see how one UK price would work.

- (n) What are your views on the interaction of the Burial and Cremation (Scotland) Act 2016 with the proposal of price regulation in the UK (paragraph 74)?

SAIF have always supported and contributed to the development of regulations following the Burial and Cremation (Scotland) Act 2016. If price regulation were to be introduced it is possible for this to sit alongside any Funeral Directors Code of Practice going forward. Whilst consumer protection is not a devolved area and will not come under the Scottish Parliament it could still be the responsibility of any Scottish Funeral Inspector with reports going to the designated persons or group appointed by Westminster. Licensing of the Industry is a devolved responsibility and could be introduced and managed by the Scottish Parliament.

#### Implementation, monitoring and enforcement

- (o) What is your assessment of whether the option of setting a maximum price for a benchmark package of products/services (paragraph 60) is capable of effective;
- (i) implementation?
  - (ii) monitoring?

(iii) enforcement?

If a benchmark price for a specified package is introduced the above three areas would not be problematic with the requirement for annual returns to be made.

(p) Do you think that compliance reporting requirements to the CMA or a regulator, should be the same for all funeral directors (paragraph 94(b))?

Not necessarily. The vertically integrated funeral businesses and large chains can cross subsidise their operating costs, thereby creatively manage their reporting figures to a regulator.

Over demanding regulation could see the micro to small rural funeral director exit the market due to the onus of reporting. The impact will be higher costs for those in rural and isolated regions of the UK.

(q) Do you have any views or suggestions on designing and implementing an effective communication strategy to ensure that consumers, funeral directors and relevant third parties understand their rights and responsibilities if price regulation is introduced in the funeral industry? In addition, how could we ensure that a benchmark package is sufficiently promoted and visible to consumers (paragraph 94(c))?

SAIF are willing and keen to work alongside the CMA to design and implement an effective communications strategy to ensure that consumers, funeral directors and relevant third parties disbursement providers, understand their rights and responsibilities.

SAIF launched an impartial consumer website for this purpose

[www.funeraladvice.org](http://www.funeraladvice.org)

A number of communication methods could be introduced such as promotion by Local Authorities, Consumer Protection groups like Citizens advice and other local groups. Requirement for funeral directors to include on their websites.

(r) What preparation would be required and how long do you think funeral directors might require in order to prepare for the implementation of any price control regulation?

An extended transition period will be necessary, point 101 (t) suggests five to seven years for a regulator appears reasonable for the diverse business models of funeral directors to manage the change for it to become enforceable.

Most Companies will have financial projections and budgets currently in place and any downturn in profit due to price regulation could have a serious effect on the companies in the future.

Also for those funeral businesses whose shares are traded and give dividend and profit projections to the Stock Exchange, a downturn of expected incomes will have a serious effect on future investment, investor relations, share price and the viability of their business operations.

- (s) What would be the likely costs of implementation, monitoring and enforcement for funeral directors?

Depends where responsibility lies; if there will be a licence cost; costs will vary depending on company size and amount of reporting.

- (t) Do you consider an initial duration of five to seven years is an appropriate period for the implementation of a price control remedy and achievement of its aims (paragraph 24)?

Five to seven years would be feasible to re-gear the funeral services market.

- (u) Do you consider there to be other risks or options for mitigation which we have not considered (paragraphs 75-77)?

Further investigation is vital to assess the impact of COVID – 19 on the funeral services market and sector, including the impact on the consumer purchase journey and preferred options. For instance a move to direct cremation and basic funerals, would lead to significant challenges in the balance sheet for funeral directors and their operating scale and models.

If regulation is taken based only on the information gathered in 2019 and prior to the pandemic it could have the effect of placing some businesses in serious financial difficulty. Any price regulation needs to consider increased costs to the funeral director by way of compliance with any Code of Practice and Licencing scheme which may be introduced in the future.

One other aspect for the CMA to be cognisant of is that over recent years the funeral market has become distorted in some cases due to pre-payment funeral plans and the choice that families can make when it comes to at the time of need to implement the funeral plan.

Often these products are not fit for purpose and the choice of where clients can go for their funerals and then additional costs placed on the customer due to their choice of funeral plan product.



The consequence is that consumers can feel that the funeral director as a profession are being less than honest.

When in fact, it is the third party sellers encouraged by some of the pre-payment companies that have taken large sums of money at the time of the plan being taken out. During this time the average shortfall for us on third party sold plans has been around £300.00 and this is at this figure because of the reduction in Dr's fees.

This needs addressing not only by the FCA, but impact on at-need services, for the CMA to understand the impact on the consumer behaviour and detriment towards funeral services.

## **Response to CMA Papers on Local Authority Tendering Remedy**

LA tendering as a remedy option

(a) To what extent do respondents think that wider introduction of tendered LA low-cost funeral schemes, intended as a response to problems identified on the demand side of the market would be: (a) effective; (b) proportionate. Please answer with respect to each of the implementation options available, that is:

(i) a CMA Order applicable to all LAs;

(ii) a CMA recommendation to LAs;

(iii) a CMA recommendation to central government(s) that it/they should create a statutory responsibility on LAs.

Local Authority (LA) low-cost funeral schemes have been tried in many locations and at various times throughout the UK over the last forty years. They have always failed, as result of the stigma associated with the Local Authorities responsibility for funerals of destitute people commonly still referred to by many as a 'pauper's funeral'.

Not all Funeral Companies will tender for this work which results in restriction of choice for the consumer which would not meet your aim of improving competition. Problems in identifying who would be eligible when people move away from an area sometimes when it's at the insistence of the LA to place them in accommodation outside the area.

We do not see this as a viable solution to price regulation.

Also, LA needs to beware of anti-competitive trading with their internal markets and unfair advantages against the private sector.

(b) How should the specification of the funeral product to be provided under a LA scheme be determined?

-

Should the focus be on delivering a competitive negotiated price for a 'standard' funeral package, or addressing funeral poverty through ensuring availability of a low-cost respectful funeral option.

-

How much scope, if any, should there be for variations between LAs?

The models we have seen include:

1. Stand alone new company, e.g., Regent Funeral Service, Gateshead.
2. Contracted out: funeral directors bid for the contract.
3. Internal funeral service: Brent funeral service

(c) What might be potential unintended consequences of wider LA tendering for low cost residents' funerals?

Birmingham City Council increased their burial fees in 2019 by 52%, this was to match their neighbouring Council, Dudley that had higher charges.

LAs have practiced cross subsidising the overall LA budget through the cash income of crematoria and cemeteries, and often investment in staff, facilities and services have not resulted.

(d) What are the current barriers to LAs establishing tendered low cost funeral schemes (eg available resources, other priorities, not regarded as a LA responsibility, etc)? How might they be overcome?

See 3iii above

(e) What are the barriers to funeral director participation in LA tenders for resident schemes? How might they be overcome?

See 3iii above

(f) f) What are the barriers to take-up of LA resident schemes by bereaved families? How might they be overcome? What types of bereaved people/families would be most likely to use such schemes?

-



(g) What impact have existing LA schemes had on wider pricing for funerals in their respective local areas?

See 3iii above

(h) What should be the CMA's priorities for further analysis or evidence gathering on existing schemes?

Gateshead City Council - £265,000 invested to establish Regent Funeral Service. Is this good use of public taxes, when existing funeral services are available at similar or lower fees to the consumer?

North East Lincolnshire Council – proposed the model of contracting funeral services, after various feasibility studies and the election of councillors the scheme was dropped for lack of financial viability.

Caledonian Cremations a Scottish Government subsidised direct cremation company – alleged anti-competitive investment by ScotGov with EU funds.

Brent Funeral Service, London: unfair practices of advertising next to the Brent Bereavement Registry Office, and unaccountable information on costs and any cross-subsidies. Not a level playing field for local funeral directors in Brent.

LA tendering as basis for price benchmarks

Do respondents think that the outcomes of current and future LA tendering exercises for provision of resident funeral schemes could provide useful data points for benchmarks to feed into price controls?

See 3iii above

Other comments

(i) Please provide any other relevant comments or observations on these proposals.

-

SAIF Business Centre  
3 Bullfields  
Sawbridgeworth  
Herts CM21 9DB

01279 726777  
[info@saif.org.uk](mailto:info@saif.org.uk)