



**ROYAL LONDON RESPONSE TO THE COMPETITION & MARKET  
AUTHORITY'S FUNERALS MARKET INVESTIGATION PROVISIONAL  
DECISION REPORT**

The Royal London Group is pleased to provide comments on the Competition & Market Authority's (CMA) *Funerals Market Investigation Provisional Decision Report*.

The CMA Report is in line with our – previously stated - view that overcoming the lack of demand for competition by consumers in this market represents a significant challenge. Consumer behaviour when purchasing a funeral is singular in its lack of consideration of factors such as price, quality or comparison of providers to any great extent. The CMA has rightly identified this is largely due to the vulnerable and distressed condition the purchaser is in when making the decisions.

While there has been an increase in the availability of online comparison sites and provision of cost information online, consumers are not shopping around and therefore not accessing this information. It is also worth noting that comparison sites are commercially driven and, as a result, may not always offer comprehensive information or be set up to deliver best outcomes for consumers.

In our response to your *Consultation on the Proposal to Make a Market Investigation Reference*, we proposed the following solutions. We therefore welcome the proposals that will go some way to addressing our first two recommendations but would stress the need to also consider numbers 3 & 4.

1. Increase awareness of the cost of funerals, options and fact that price and quality can vary significantly by provider – this is critical to try and increase the numbers of people able to make informed decisions.
2. An effective framework for assessing quality and standards of funeral directors to give consumers the ability to make a confident decision on who they wish to conduct the funeral they are planning.
3. Consistency and clarity of information provided by all funeral providers to enable consumers to select a funeral director and service based on factors which matter to them, including cost, quality and standards.
4. Timely access to/provision of information about services/providers in local areas through a variety of mediums. The timescale for making a decision on a funeral director is likely to be very short so ideally some independent intervention would be made at a hospital or care home, where the majority of deaths occur.

We remain concerned that this report fails to mention the need for action on the wider issue of funeral poverty. While we accept this falls outside the remit of this investigation we would urge you to ensure these issues are referenced in any recommendations to Government. This will ensure that while your recommendations rightly focus on addressing the cost of funerals, they also acknowledge the additional needs of with low or no income who rely on the benefits system and local authority support.

We have been campaigning for improvements for many years and specifically:

1. Improving the benefits system to ensure the Funeral Expenses Payment is fit for purpose, and adequately funded to protect people from being forced into funeral debt as they look to make up the shortfall between government support and the cost of a funeral.
2. Demanding minimum standards for public health funerals (historically described as paupers' funerals) provided by local councils. Local council provision varies hugely and minimum standards would ensure those eligible are entitled to a simple, but dignified send-off.

We would be happy to meet to discuss the any of the points further, if that would be helpful.

Louise Eaton-Terry  
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