

Golden Charter

September 2020; Submission to the CMA:

Consultation response to the CMA's Funeral Director
Market Investigation Provisional Decision Report.

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1. Introduction

Golden Charter Limited, a leading provider of pre-paid funeral plans in the UK, submits this document as part of the Competition and Markets Authority (CMA) consultation on its Provisional Decision Report, published on 13 August 2020, as part of the CMA's Market Investigation into Funeral Director and Cremation Services.

Wholly owned by an association of 777 independent funeral directors, and with over 2,900 funeral directors accepting its prepaid plans, Golden Charter's overarching purpose is to help people plan for the funeral of their choice. More than 700,000 customers have trusted Golden Charter to take care of their end of life planning arrangements over 30 years of trading. In pursuit of its purpose, Golden Charter works in partnership with local, often family-owned businesses to protect and enhance the choice and diversity they offer their communities, and the contribution they make to the local economy in villages, towns, and cities across the UK.

With a commitment to tackling funeral poverty by educating citizens about their choices, delivering affordable funerals, and encouraging end-of-life planning, Golden Charter welcomes the Provisional Decision Report and is broadly supportive of the provisional recommendations. Golden Charter wants to see a regulatory regime that is affordable, effective and fair and believes the following comments positively build on the provisional recommendations in the interest of consumers.

2. Executive Summary

With a commitment to tackling funeral poverty, educating citizens about their choices, delivering affordable funerals, and encouraging end-of-life planning, Golden Charter welcomes the Provisional Decision Report. In welcoming the report, Golden Charter asks the CMA to consider the following:

a. Funeral planning omission

Noting that customers in the pre-need market are rational consumers, making decisions in their habitual emotional state, without limits on time and, often, with recent experience of arranging a funeral, Golden Charter believes that a culture of open conversations and early engagement around end-of-life planning remains fundamental to tackling at-need vulnerability. Consequently, Golden Charter is disappointed that the CMA has omitted funeral-planning remedies from its provisional recommendations and asks that the CMA include *'raising funeral planning awareness before the point of need'* in its final package of remedies.

b. Quality of care remedies

It's a matter of public record that Golden Charter supports the introduction of a statutory code of conduct and a licensing and inspection regime in Scotland, so, naturally, Golden Charter welcomes the CMA's proposals to extend inspection and registration regimes across the whole of the UK. Golden Charter wishes to see regimes that reassure bereaved families that their loved one is with a funeral director who is effective, caring, responsive and safe and that the firm has effective leadership. To achieve an inspection regime that delivers such improvements across the industry, Golden Charter believes that the eventual inspection regimes should be easy to navigate and understand, responsive to market innovation, encourage self-improvement through self-evaluation, safeguard consumer choice, and be independent of both the funeral profession and of local government.

c. Price control remedies

Golden Charter believes that the CMA's proposed information and price transparency remedies, combined with increased monitoring and reporting of prices, will curb future unnecessary funeral and crematoria price inflation, without the need for potentially costly and difficult to enforce price caps. Consequently, Golden Charter asks that the CMA allows enough time to evaluate the effectiveness of information and price transparency remedies and its price monitoring and reporting before considering a supplementary market investigation into price control remedies.

d. Transparency remedies

Golden Charter supports the CMA's proposal that it place a requirement on funeral directors to publish price and contractual information on their websites and within their premises for simple, standard, and their most common funeral packages, alongside ownership information. Golden Charter also believes that promoting a defined simple funeral package that funeral directors can adopt voluntarily, would make it easier for customers to compare like-for-like packages. Additionally, Golden Charter believes that the CMA should require funeral directors to provide customers with a description of their processes for the care of the deceased, the specific services included and a description of the support available for the bereaved upon request.

As the present wording expects funeral directors' websites to display pricing information in a set fashion, Golden Charter notes that smaller firms have less sophisticated footprints than larger funeral directors and, importantly, comparison websites. To avoid disadvantaging smaller businesses we suggest that the prescribed requirements should also apply to comparison websites and online resources aggregating funeral directors' services.

3. Golden Charter's comments on the Provisional Decision Report.

a. Omission: encouraging advance funeral planning before the point of need

Funeral planning can take many forms: an informal conversation with family or friends, a written record of considered preferences, savings set aside, or a pre-paid funeral plan providing a specific arrangement. In this submission, Golden Charter refers to funeral planning in the broadest sense, encapsulating all actions that individuals and families can take to prepare for a funeral before the time of need.

i. The benefits of funeral planning

Like Golden Charter, the National Association of Funeral Directors (NAFD) contends that if society was more comfortable and confident talking about the end of life and funerals, this would *'directly lead to more informed consumers, more likely to do research, shop around, ask questions, check standards and generally make the kind of informed decisions expected during other consumer purchases'*¹. Similarly, the Local Government Association (LGA) favours remedies that raise awareness of funeral planning *'early on'* believing that such a culture would improve accessibility to low-cost funeral options², while Quakers Social Action argues that it can be *'emotionally easier'* for individuals and families to consider funeral arrangements when *'death seems further away and more abstract'*³.

ii. Culture of avoidance

Despite the individual, familial and societal benefits of funeral planning, currently, there are relatively low levels of funeral planning in the UK, both formal and informal. In 2018, only 16 per cent of UK funerals were pre-paid⁴. Research by Cooperative Funeralcare indicates that, in the absence of a culture of funeral planning, 45 per cent of UK adults' risk *'taking their final wishes to the grave'*⁵ while the clear majority (81%) *'have not saved*

¹ NAFD. (February 2020). *'Response to the CMA Working Papers published on 30 January 2020'*. Pg. 15. HM Government.

² Local Government Association. (June 2020). *'LGA Response to Competition and Markets Authority proposed price control remedy for crematoria and local authority procurement of funeral director services remedy'*. Pg. 3. HM Government.

³ QSA. (February 2019). *'Response to CMA's information and transparency remedies working papers'*. Pg. 10. HM Government.

⁴ CMA. *'Funeral Market Investigation: Provisional Decision Report'*. Pg. 26. HM Government.

⁵ Sandlin. (2019). *'14 million Brits risk taking last request to the grave'*. Funeral Service Times.

*anything towards a funeral plan*⁶. Similarly, insight from Quakers Social Action indicates those on a low income, who may benefit most from planning ahead, are currently unlikely to do so, and that, among those who have sought the charity's support before bereavement, the majority did so at a point where 'a *death was expected*'⁷.

iii. CMA omission

Considering the above, Golden Charter was pleased that the CMA consulted on '*funeral planning awareness before the point of need*' as a potential remedy to at-need vulnerability' and notes that Appendix W of the Provisional Decision Report (the report) determines that:

- Improving customer awareness of funeral planning would leave some customers '*better prepared to assess and compare the prices and services offered by funeral directors*'⁸.
- Dissemination of guidance on arranging a funeral before the time of need would '*help increase awareness of funeral planning amongst customers*'⁹
- The '*cost of developing guidance on funeral planning would be low*'¹⁰ and
- The Care Quality Commission (CQC) and its equivalent body in each of the devolved nations could develop the guidance¹¹.

Nevertheless, despite the consultation responses submitted by Golden Charter, the NAFD, the Quakers Social Action Fund and the Local Government Association, and the conclusions outlined in Appendix W, Golden Charter is disappointed that the report's provisional recommendations omit any provisions that would encourage families to consider their funeral wishes before the point of need.

⁶ Cooperative Funeralcare. (2018). 'Making peace with death: National attitudes to death, dying and bereavement'. Co-operative.coop.

⁷ QSA. (February 2019). '*Response to CMA's information and transparency remedies working papers*'. Pg. 10. HM Government.

⁸ CMA. (August 2020). '*Provisional Decision Report Appendix W: Remedies*'. Pg. 7. HM Government.

⁹ CMA. (August 2020). '*Provisional Decision Report Appendix W: Remedies*'. Pg. 7. HM Government.

¹⁰ CMA. (August 2020). '*Provisional Decision Report Appendix W: Remedies*'. Pg. 11. HM Government.

¹¹ CMA. (August 2020). '*Provisional Decision Report Appendix W: Remedies*'. Pg. 9. HM Government.

iv. The case for funeral planning as a remedy

While the CMA's consumer survey indicated that only 17 per cent of customers compared the services of two or more funeral directors¹², Golden Charter notes that most customers felt that they had received the right amount of information at the right time¹³ and that nine in ten considered that their funeral director either met or exceeded their expectations¹⁴. This apparent contradiction, between low levels of 'shopping around', yet high levels of consumer satisfaction, led the CMA to hypothesise in its 'Sales Practices and Transparency' working paper that '*sales practices that result in a lack of transparency may therefore be driven by [bereaved] customer preferences*'¹⁵ at the time of need.

With more than a quarter (27%) of families who purchased a Golden Charter plan in 2019¹⁶ making a comparison with another provider (compared to 17% in the at-need market), Golden Charter believes that having earlier conversations on death and dying and planning funerals before the point of need allows customers the time and emotional space to better engage with and consider their funeral market options in their habitual emotional state.

Considering this, Golden Charter believes that a concentrated, coordinated effort to change the societal culture around death and dying, to one of open conversations and early engagement, is as fundamental to addressing at-need vulnerability as price and quality transparency remedies and asks the CMA to include '*raising funeral planning awareness before the point of need*' in its final package of remedies.

v. Remedy design

Golden Charter notes that the CMA considers that an organisation like the Care Quality Commission could lead on the development of funeral planning guidance and that funeral directors, cremation operators, trade associations, and consumer groups could distribute

¹² CMA. (30 January 2020). '*Funeral Market Investigation: Consumer survey results*'. Page 11. HM Government.

¹³ CMA. (30 January 2020). '*Funeral Market Investigation: Funeral director sales practices and transparency*'. Page 2. HM Government.

¹⁴ CMA. (30 January 2020). '*Funeral Market Investigation: Consumer survey results*'. Page 2. HM Government.

¹⁵ CMA. (30 January 2020). '*Funeral Market Investigation: Funeral director sales practices and transparency*'. Page 2. HM Government.

¹⁶ CJM Research. (2019). '*Consumer Survey*'. Golden Charter.

this guidance to customers, both online and in paper form¹⁷. Golden Charter believes that such a system would be an effective, affordable and fair method of encouraging customers to consider funeral planning before the point of need. Golden Charter further believes that, to be effective, this guidance should provide customers with an overview of the funeral process, from death to final arrangements, including:

- an explanation of the different types of funeral and crematoria services including new and emerging services and information on prepaid funeral plans;
- a distinction between the essential aspects of a funeral and those that a customer can exclude or include at their discretion;
- an explanation of the circumstances where customers can switch funeral director;
- a checklist of questions or key requirements that customers may wish to cover during their arrangement meeting with the funeral director
- price and service information on local funeral directors and crematorium operators, including payment terms, and;
- financial and bereavement support available to customers.

Regarding the circumstances before the point of need at which consumers are likely to be receptive to the idea of preparing for their funeral, Quakers Social Action reports that its at-need clients often comment that *'dealing with someone else's funeral, experiencing the stress of financial difficulties and a lack of knowledge about the deceased's funeral wishes, has made them think about planning for their own'*¹⁸. Likewise, the NAFD contends that those who have recently attended a funeral may be more receptive to the idea of preparing for their funeral, with recent YouGov research indicating that the death of someone close would prompt almost half (48%) of people to think about their own funeral¹⁹.

Similarly, Golden Charter's analysis of plan holder feedback further indicates that protecting bereaved family members from additional stress at the point of need is a

¹⁷ CMA. (August 2020). *'Provisional Decision Report Appendix W: Remedies'*. Pg. 9. HM Government.

¹⁸ QSA. (February 2019). *'Response to CMA's information and transparency remedies working papers'*. Pg. 10. HM Government.

¹⁹ NAFD. (February 2020). *'Response to the CMA Working Papers published on 30 January 2020'*. Pg. 14. HM Government.

significant driver in consumers' decision-making process, as illustrated by the quotes below²⁰:

"Good system for making sure your relatives are not burdened unnecessarily after a death".

"Relieved that I have made these plans for my family".

"Peace of mind for my son".

"My children would find it impossible to raise the monies for funeral expenses should we die without making these arrangements".

"We know our family will be well looked after through the very emotional experience of burying/cremating their parent/s."

"With the plan in place, the burden is lifted from my immediate family".

| Reasons for taking out a funeral plan | Important or very important |
|--|-----------------------------|
| No worries for family about paying for the funeral | 88% |
| To honour the wishes of the deceased | 88% |
| Alleviates pressure at a stressful time | 86% |
| Makes good financial sense | 83% |
| No worries about organising the funeral details | 82% |
| No worries about choosing a funeral director | 72% |
| Stops disagreements between family or loved ones | 69% |

Table 1: James Law Research Associates (2020)

In-depth interviews with research participants gave further insight into plan holders' prior experience with funeral arranging, as indicated by the following quote²¹:

"It was so hard watching my family having to be practical at a difficult time when my husband died – I didn't want it to be the same when I passed away" – Golden Charter customer, female, 65 years.

As such, Golden Charter believes that people who have recently attended or organised a funeral would be particularly open to considering plans for their own funeral, and,

²⁰ Trust Pilot. (2019-20) 'Golden Charter Reviews'. Uk.trustpilot.com.

²¹ James Law Research Associates. (2016). 'Motivations for buying a funeral plan'. James Law Research Associates.

therefore, any body, such as the Care Quality Commission, tasked with developing funeral planning guidance should keep this in mind.

b. Quality of care remedies

Golden Charter notes that The CMA provisionally recommends that the UK, Welsh, and Northern Irish governments legislate for an inspection and registration regime in their respective jurisdictions, with the capabilities to establish, monitor, and enforce a set of statutory minimum standards.

Golden Charter is committed to partnering with funeral directors of the highest standards and only funeral directors signed-up to a code of practice independently monitored by a professional trade body can sell Golden Charter funeral plans. Golden Charter supports the introduction of a statutory code of conduct and a licensing and inspection regime in Scotland, so, naturally, Golden Charter welcomes the CMA's proposals to extend inspection and registration regimes across the whole of the UK.

i. Be independent of the funeral profession

Golden Charter wishes to see a regulatory regime that reassures bereaved families that their loved one is with a funeral director who is effective, caring, responsive and safe and that the firm has effective leadership.

Golden Charter notes that, with industry self-regulation, there is a risk, both real and in terms of public perception, that regulators might advance industry interests before those of consumers. Considering this, Golden Charter supports the creation of an autonomous, independent sector regulator. This would eliminate potential conflicts of interest between the roles of industry advocate and regulatory watchdog and improve public confidence in sector regulation as well as the ability of the regulator to develop, monitor, and enforce regulations in the public interest.

Local government operates over 60 per cent of all UK crematoria²² and most UK cemeteries. Given local authorities are increasingly active in the at-need funeral services market,

²² CMA. (January 2020). 'Crematoria: background and market structure'. Pg. 8. HM Government.

Golden Charter believes that any future funeral director inspectorate must also be autonomous and fully independent from local government.

The Scottish Government has made considerable progress toward its own independent, statutory inspection regime. While a similar national inspectorate model may be viable in Wales and Northern Ireland, Golden Charter recognises that the population scale of England means that the Government may look at an alternative model of delivery. Golden Charter asks that the CMA and the Government consider the merits of a national framework, administered by inspectorates for each English region – an inspector for the East Midlands, for example.

ii. Safeguard consumers' choice

Consumers often choose an independent funeral director over a corporate provider as they consider an independent to be providing a more personal service when making a purchase decision in which they are emotionally invested. Whilst it is vital that all funeral directors integrate the highest of standards into their operation, such integration should not result in large scale assimilation of businesses reducing choice for consumers. For example, while we know that good leadership is important, no matter the size of an organisation, it may look different depending on the scale of the business. While a traditional corporate structure may provide the right leadership for a multi-branch, corporate provider, a distributed leadership model, whereby all staff gain wider exposure to different job functions, may result in better leadership in a single-branch, family-run firm. An inspection regime, designed to recognise excellence in its many forms, should drive up standards for the bereaved and deceased, while safeguarding consumers' ability to choose between corporate providers and local independent funeral directors.

iii. Be legible and navigable

Golden Charter believes that an inspection regime, which is easy to navigate and understand, will secure the confidence of those involved, generate a higher level of compliance and make it easier for consumers to monitor the impact of inspections.

In a mixed-methods study into the effects of regulation on the growth of small and medium-sized enterprises (SMEs) by academics at the University of Wuppertal, reliability and continuity of regulation emerged as a powerful aspect in securing the confidence of owner-managers²³. According to the study, regulatory stability is particularly important in SMEs having the confidence to meet consumers' evolving needs by innovating and bringing new products and services to the market.

To achieve an inspection regime that is easy to understand and navigate, the inspector's quality indicators by which it assesses funeral directors, must be clear. Specific guidance on the inspector's expectations for the induction and training of staff, for example, should be readily available.

Finally, while Golden Charter understands the inspection regime will evolve over time, frequent changes to the methods used by inspectors and regulators could make it difficult for funeral directors, government officials and consumers to monitor the impact of inspections or to compare reports. Therefore, when changes to the regulatory framework are required, Golden Charter believes that incremental implementation, in consultation with the profession, will best allow the funeral sector to adapt to change.

c. Price control remedies

Golden Charter notes that once the funeral market returns to a steady state, post-coronavirus, the CMA will consider holding a supplementary market investigation to resolve the pricing issues and that, in the interim, the CMA will actively collect, monitor and publish annual reviews on the revenue and sales volumes of firms with five branches or more.

Golden Charter is committed to tackling funeral poverty, educating citizens about their choices, delivering affordable funerals and encouraging end-of-life planning. Like the CMA, Golden Charter wants fair and transparent pricing across the at-need funeral market and believes that the proposed information and price transparency remedies, combined with

²³ Grünhagen M. and Berg H. (2011). Modelling the antecedents of innovation-based growth intentions in entrepreneurial ventures: the role of perceived regulatory conditions in the German renewable energies and disease management industries. *International Journal of Technology, Policy and Management* Volume 11. Issue 4. Pages 220-249.

price monitoring and reporting, will be more effective than price control remedies at curbing funeral price inflation, for the reasons outlined below.

i. Cost burden of price regulation

With over 70 per cent of the UK's funeral directors small or micro providers²⁴, Golden Charter believes that it could be disproportionately costly and impractical for the CMA or any sector regulator to implement, monitor and enforce price controls in such a highly fragmented sector. Costs could include creating a register of funeral directors; managing registration; setting and updating an appropriate cap; collecting and analysing data for thousands of firms; monitoring the thousands of firms for price compliance; and taking enforcement action.

ii. Logistical challenge of price controls

By providing a single point of contact through which the bereaved can arrange all aspects of a funeral service, funeral directors ease the burden placed on grieving families at a difficult time. However, of those costs that most commonly contribute to a final funeral bill, a significant and increasing proportion are charges applied by third parties. These could include, for example, local authority burial or cremation charges, church parochial fees, fees for the services of celebrants, florists and musicians, as well as venue hire and catering for the wake. From the customers' perspective, a price control on funeral directors' fees, without a cap on the fees of third party providers, could result in the final funeral bill continuing to increase year-on-year, leaving consumers confused, and could further complicate any sector regulator's ability to monitor and enforce a cap.

iii. Shopping around

The CMA has indicated that its preferred price control option would be to set a maximum price for a defined 'benchmark' funeral package until the government can establish an independent regulator with responsibility for price control²⁵. Golden Charter notes that such an action would still require grieving customers to choose between the set price

²⁴ CMA. (February 2020). 'Remedy options for regulating the price of funeral directors' services. HM Government.

²⁵ CMA. (August 2020). 'Provisional Decision Report Appendix W: Remedies'. Pg. 17. HM Government.

'benchmark' funeral package and other, potentially higher-priced funeral packages, at a point where the effects of bereavement could make it difficult for the customer to make an informed choice. Thus, Golden Charter believes that, even if such a price control was in place, it is unlikely to have the desired effect, without the CMA taking forward proposals that would encourage early engagement with funeral planning before the point of need, at a time when the customer can make a decision in their habitual emotional state, without limits on time.

iv. Curbing price inflation

As an alternative, Golden Charter believes that the CMA's proposed information and price transparency remedies will curb future levels of funeral and crematoria price inflation without the need for potentially costly and difficult to enforce price caps. Consequently, Golden Charter asks that the CMA allows enough time to evaluate the effectiveness of information and price transparency remedies and its price monitoring and reporting before considering a supplementary market investigation into price cap remedies.

d. Transparency remedies

Golden Charter notes that the CMA provisionally recommends that it place a requirement on funeral directors to display price information for their standard, simple, and most commonly sold funeral packages on their website and within their premises, along with the terms and conditions of sale. Golden Charter further notes that the CMA provisionally recommends that it place a requirement on funeral directors to disclose to customers the ultimate owner of the business, if they have any interest in a price comparison website and any donations they have made to third parties, such as care homes. While broadly supportive of these recommendations, Golden Charter makes the following observations:

i. Online price and information transparency

While supportive of the CMA's recommendation that funeral directors should display price and service information on their websites, Golden Charter notes that some funeral directors prefer to maintain an online presence via social media sites, such as Facebook and Twitter, only. Considering this, Golden Charter asks the CMA to consider how it could

encourage such firms to display transparent price information online, in the absence of a traditional website.

ii. Aggregator websites and directories

Golden Charter launched its first online directory of independent funeral directors almost a decade ago, noting that such a service would help consumers identify and compare their options and, in recent years, the funeral sector has seen a steady growth in such online 'find a funeral director' directories, aggregator websites and price comparison websites (PCWs).

Given that many smaller, often family-owned funeral directors do not maintain a dedicated website and often lack the skills and resources to effectively compete online, digital directories, aggregator websites, and PCWs are key to their ability to compete effectively in the digital environment and an essential source of online information for consumers on the independent sector. By providing a platform for small and micro firms to have a digital presence, in turn, such services provide consumers with access to funeral options that are generally more affordable than those that the larger providers offer.

Consequently, Golden Charter notes with disappointment that the CMA provisional proposals in relation to the display of contractual and price information for simple, standard and most commonly sold funeral packages is limited to funeral directors' websites only. Considering the significant role that online directories, PCWs, and aggregator websites play in providing consumers with choice and information, Golden Charter asks that the CMA extend its provisional transparency recommendations, placing an equal requirement on all directories, aggregator websites, and PCWs to display contractual and price information for simple, standard, and most commonly sold funeral packages.

iii. Simple funeral package

Golden Charter notes that, in proposing that it place a requirement on funeral directors to display the price of a simple funeral package, the CMA has defined a simple funeral as *'the simplest funeral package that the funeral director offers'*²⁶. Consequently, two 'simple'

²⁶ CMA. (August 2020). 'Funeral Market Investigation: Provisional Decision Report'. Pg. 466. HM Government.

funeral packages could include significantly different services and products, making it challenging for customers to make a meaningful comparison on price.

Golden Charter notes that the Scottish Government encourages funeral director firms to offer, on a voluntary basis, a 'simple funeral package' that aligns with its published definition of a simple funeral, to make it easier for customers to compare products on a like-for-like basis. The Scottish Government's definition of a simple funeral includes²⁷:

- the funeral director's services;
- attending to the necessary arrangements, such as completion of necessary certification, taking instructions and providing guidance on registration and legally-required procedures;
- provision of the necessary staff for the care of the deceased and support for the bereaved;
- provision of an appropriate and robust lined coffin suitable for burial or cremation;
- transportation of the deceased person from the place of death during normal working hours (normally within ten miles but accounting for local circumstances);
- appropriate arrangements for the uplift of the deceased and care of the deceased person before the funeral, in appropriate facilities;
- viewing of the deceased person, by appointment;
- provision of a hearse or other appropriate vehicle direct to the nearest crematorium or cemetery at a date and time agreed with the funeral director and clearly described to the client;
- the opportunity to hold a service at the cemetery or crematorium;
- does not include embalming, the provision of a limousine, or any third party or disbursement payable on the client's behalf.

Golden Charter broadly supports the Scottish Government's definition of a simple funeral and believes that promoting a similar defined simple funeral package on a voluntary basis could compliment the CMA's proposed requirement for funeral directors to display the price of their simplest funeral package.

²⁷ Scottish Government. (May 2019). 'Funeral costs: guidance'. Scottish Government.

iv. Description of care processes

Golden Charter notes that the provisional recommendations on transparency exclude any requirement for funeral directors to provide customers with a description on the processes for the care of the deceased upon request, focusing instead on price and contractual transparency.

However, as an emotional purchase²⁸, Golden Charter recognises that the quality of care offered by the funeral director, the time the funeral director spends with the bereaved, the ease with which the service is organised, the funeral director's ability to meet specific religious, cultural or geographic requirements and the care that is taken to honour the memory of the deceased will contribute to the consumer satisfaction, beyond costs²⁹.

Considering this, Golden Charter asks that the CMA considers requiring that, upon request, funeral directors provide customers with a description of their processes for the care of the deceased, the specific services provided and a description of the support available for the bereaved.

In making this recommendation, Golden Charter recognises that some details, regarding the treatment of the body, may distress bereaved family and friends. As such, Golden Charter would recommend that, while funeral directors should always inform customers that a full description of care processes is available, funeral directors should only provide such descriptions upon request.

v. Ownership transparency

Customers often choose an independent funeral director over a corporate brand as they consider independents to provide a more personal service when making a purchase decision in which they are emotionally invested, yet there are cases of national brands marketing branches in ways that imply that they are standalone independent funeral directors. Consequently, Golden Charter welcomes the CMA's provisional

²⁸ Corden, A. and Hirst, M. (2015). 'The Meaning of Funeral Poverty: an exploratory study'. York. University of York Social Policy Research Unit. Pages 1-36.

²⁹ Ruth McManus & Cyril Schafer. (2014). 'Final arrangements: examining debt and distress'. Mortality. Volume 19. Issue 4. Pages 379-397.

recommendation that it places a requirement on funeral directors to disclose to customers the ultimate owner of their business.

4. Contact details

For further information or clarification, please contact Golden Charter External Policy Consultant Patrick McGlinchey by email at [REDACTED] or by telephone on [REDACTED].