

#1

COMPLETE

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Page 1

Q1

What is the name of your business?

Fred Stevens Funeral Directors

Q2**England**In which of the UK nations does your business operate?
(tick all that apply)**Q3**

How many funeral homes do you operate?

Two

Q4

In paragraph 16 of the Provisional Decision report, the CMA estimates that the consumer detriment (over-payment) arising from lack of effective competition between funeral directors is at least £400 per funeral, on average, across a significant proportion of the market (i.e. customers of both large and many small firms). Please provide your comments to the CMA on this estimation, in particular in the context of your own business.

In my own area that disparity would only apply between us and corporate FD's

Q5

In paragraph 9.160 the CMA proposes that all funeral firms with five or more branches should have to provide the CMA with the total number of funerals provided each quarter and the total revenue (excluding disbursements) per funeral during that quarter. For firms with more than ten branches this will need to be further broken down by funeral type. There is no specified end date to this requirement. Please provide your comments to the CMA on this proposed requirement.

The CMA will need a lot of staff and resources for that.

Q6**Respondent skipped this question**

If your funeral firm has more than five branches, will this quarterly monitoring requirement incur any costs on the part of your business? If yes or not sure, please explain to the CMA what you believe these costs will or may be comprised of.

Q7

In paragraph 9.24 the CMA has provisionally decided to require all funeral directors to provide customers with information on the price of their: a) most commonly sold funeral package; b) standard funeral package (if different); and c) the simplest funeral package they offer. Please provide your comments to the CMA on this proposed requirement.

Covered by the NAFD Code of Practice anyway

Q8

In paragraph 9.28, the CMA has provisionally decided to require all funeral directors to provide customers with information on the price information of crematorium operators within a 30-minute cortege drive time from their business premises. Please provide your comments to the CMA on this proposed requirement.

We do anyway, when it's required. But what would be the point? The customer will choose the crematorium on a whole range of factors against which the disparity in cost (which is fairly minimal anyway) becomes somewhat irrelevant

Q9

In paragraph 9.27, the CMA has provisionally decided to require all funeral directors to provide customers with details of their terms of business, specifically: a) the size of upfront deposit required; b) when the deposit and final balance must be paid; c) any available payment options for paying the deposit balance; and d) any charges for late payment. Please provide your comments to the CMA on this proposed requirement.

We do anyway.

Q10

The CMA has provisionally decided to require funeral directors to make available to customers, both at their premises and online, clear and prominent information about any charitable or gratuitous payments made by the business (paragraphs 32-33). Please provide your comments to the CMA on this proposed requirement.

Perfectly reasonable if it's above a certain amount - say, £500 to any one individual charity, although the 'type' of charity the firm has made payments to would be more useful

Q11

The CMA has provisionally decided to prohibit funeral directors from making payments to, or engaging in arrangements with, hospices, care homes and other similar institutions, which encourage or incentivise those institutions to refer customers to the funeral director (paragraph 34). Please provide your comments to the CMA on this proposed prohibition.

Good.

Q12

Also in paragraph 34, the CMA has provisionally decided to prohibit funeral directors from soliciting for business through coroner and police contracts. Please provide your comments to the CMA on this proposed prohibition.

Good. Although the t's & c's of the contract should prohibit that anyway. The obvious answer would be to prohibit the identity of the contractor from being known in the first place

Q13

In paragraph 9.21, the CMA has provisionally decided to recommend to the UK government and devolved administrations in Wales and Northern Ireland, that they should establish an inspection and registration regime to monitor the quality of funeral director services as a first step in the direction of a broader regulatory regime for funeral services in England, Wales and Northern Ireland. Please provide your comments to the CMA on this proposed prohibition.

Good

Q14

Respondent skipped this question

Please use the box below to provide the CMA with any other comments you have on the Provisional Decision Report and associated appendices.

#2

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Page 1

Q1

What is the name of your business?

Andrew Bingham Independent Funeral Service

Q2**England**In which of the UK nations does your business operate?
(tick all that apply)**Q3**

How many funeral homes do you operate?

1

Q4

In paragraph 16 of the Provisional Decision report, the CMA estimates that the consumer detriment (over-payment) arising from lack of effective competition between funeral directors is at least £400 per funeral, on average, across a significant proportion of the market (i.e. customers of both large and many small firms). Please provide your comments to the CMA on this estimation, in particular in the context of your own business.

In our local area we have Two different Co-ops, Dignity and ourselves (Independent) there is a vast difference in prices between all the services and families have plenty of choice

Q5

In paragraph 9.160 the CMA proposes that all funeral firms with five or more branches should have to provide the CMA with the total number of funerals provided each quarter and the total revenue (excluding disbursements) per funeral during that quarter. For firms with more than ten branches this will need to be further broken down by funeral type. There is no specified end date to this requirement. Please provide your comments to the CMA on this proposed requirement.

Due to our size this will have no effect on me. But it is pretty obvious this will be time consuming and will lead to probably another member of staff having to be employed thus more cost been placed on the families of the deceased

Q6

If your funeral firm has more than five branches, will this quarterly monitoring requirement incur any costs on the part of your business? If yes or not sure, please explain to the CMA what you believe these costs will or may be comprised of.

Yes,

Please provide more detail:

As previously stated this will not effect us

Q7

In paragraph 9.24 the CMA has provisionally decided to require all funeral directors to provide customers with information on the price of their: a) most commonly sold funeral package; b) standard funeral package (if different); and c) the simplest funeral package they offer. Please provide your comments to the CMA on this proposed requirement.

We already do, so do not have a problem

Q8

In paragraph 9.28, the CMA has provisionally decided to require all funeral directors to provide customers with information on the price information of crematorium operators within a 30-minute cortege drive time from their business premises. Please provide your comments to the CMA on this proposed requirement.

in my experience of over 34 years, not once has a family changed the venue of the funeral because of cost

Q9

In paragraph 9.27, the CMA has provisionally decided to require all funeral directors to provide customers with details of their terms of business, specifically: a) the size of upfront deposit required; b) when the deposit and final balance must be paid; c) any available payment options for paying the deposit balance; and d) any charges for late payment. Please provide your comments to the CMA on this proposed requirement.

abiding by the code of practice this is already in place

Q10

The CMA has provisionally decided to require funeral directors to make available to customers, both at their premises and online, clear and prominent information about any charitable or gratuitous payments made by the business (paragraphs 32-33). Please provide your comments to the CMA on this proposed requirement.

We have nothing to hide so have no problem

Q11

The CMA has provisionally decided to prohibit funeral directors from making payments to, or engaging in arrangements with, hospices, care homes and other similar institutions, which encourage or incentivise those institutions to refer customers to the funeral director (paragraph 34). Please provide your comments to the CMA on this proposed prohibition.

Totally agree with it, the coroners service in our area is being run wrong in our area, so this practice should stop

Q12

Also in paragraph 34, the CMA has provisionally decided to prohibit funeral directors from soliciting for business through coroner and police contracts. Please provide your comments to the CMA on this proposed prohibition.

Good

Q13

In paragraph 9.21, the CMA has provisionally decided to recommend to the UK government and devolved administrations in Wales and Northern Ireland, that they should establish an inspection and registration regime to monitor the quality of funeral director services as a first step in the direction of a broader regulatory regime for funeral services in England, Wales and Northern Ireland. Please provide your comments to the CMA on this proposed prohibition.

We are an open and transparent business, so have no problems with this. My only concern is what will any regulation cost, thus having to pass onto the client

Q14

Please use the box below to provide the CMA with any other comments you have on the Provisional Decision Report and associated appendices.

No comments

#3

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Page 1

Q1

What is the name of your business?

Mark Shaw Funeral Services Ltd

Q2**Scotland**In which of the UK nations does your business operate?
(tick all that apply)**Q3**

How many funeral homes do you operate?

2

Q4

In paragraph 16 of the Provisional Decision report, the CMA estimates that the consumer detriment (over-payment) arising from lack of effective competition between funeral directors is at least £400 per funeral, on average, across a significant proportion of the market (i.e. customers of both large and many small firms). Please provide your comments to the CMA on this estimation, in particular in the context of your own business.

How do you determine "reasonable economic profit" in a unique market?

I agree some NAFD members charge extreme costs driven for shareholder return. Please don't let us all be tainted with the same brush.

Has the review taken into account sub cost work done by the profession? Often Council funerals, Police removals, infants?

Does CMA recognise the vital infrastructure and flexible capacity the funeral profession has in view of recent and possible further pandemic deaths?

What other Private sector Organisation can be called at 3.00am in Christmas morning at no extra cost?

Q5

In paragraph 9.160 the CMA proposes that all funeral firms with five or more branches should have to provide the CMA with the total number of funerals provided each quarter and the total revenue (excluding disbursements) per funeral during that quarter. For firms with more than ten branches this will need to be further broken down by funeral type. There is no specified end date to this requirement. Please provide your comments to the CMA on this proposed requirement.

The number of branches is not necessarily a fair reflection on work carried out or market share. One branch could do 800 funerals, a 5 branch firm could do 200-300?

If they must go down this road, a total business turnover (say £5m) or cases handled (Minimum 1000) might be a better option?

Q6

If your funeral firm has more than five branches, will this quarterly monitoring requirement incur any costs on the part of your business? If yes or not sure, please explain to the CMA what you believe these costs will or may be comprised of.

Yes,

Please provide more detail:

I don't have 5 branches, but it clearly would involve increased accountancy and administrative fees which need to be passed to clients.

Q7

In paragraph 9.24 the CMA has provisionally decided to require all funeral directors to provide customers with information on the price of their: a) most commonly sold funeral package; b) standard funeral package (if different); and c) the simplest funeral package they offer. Please provide your comments to the CMA on this proposed requirement.

If our client has researched their wishes on our website, a third party website (eg GFG) or has a family tradition, I see no need to advise of all alternatives.

A family requesting Direct Cremation after doing research may feel we are trying to "up sell"

A family with a wish to have church service & burial may even take offence at being offered Direct Cremation.

Some families do of course need all options to consider and contrast.

Q8

In paragraph 9.28, the CMA has provisionally decided to require all funeral directors to provide customers with information on the price information of crematorium operators within a 30-minute cortege drive time from their business premises. Please provide your comments to the CMA on this proposed requirement.

We have 2 crematoria. This is not a major concern. Again, a family requesting an attendee service at one because it's where the family go may not need to know about the un-attended cost at the other.

I appreciate that some areas have several choices and significant price variables.

Q9

In paragraph 9.27, the CMA has provisionally decided to require all funeral directors to provide customers with details of their terms of business, specifically:a) the size of upfront deposit required;b) when the deposit and final balance must be paid;c) any available payment options for paying the deposit balance; andd) any charges for late payment. Please provide your comments to the CMA on this proposed requirement.

This seems fair enough, although our payment terms may vary case by case. Ie a funeral arranged by a solicitor may not need an upfront payment.

Q10

The CMA has provisionally decided to require funeral directors to make available to customers, both at their premises and online, clear and prominent information about any charitable or gratuitous payments made by the business (paragraphs 32-33).Please provide your comments to the CMA on this proposed requirement.

Does this include courtesy gifts to care homes at a Christmas? Bowling club sponsorship?

Many care homes or community events actively solicit business donations from all sectors - so is this for EVERY industry?

If donations are made to charities who are in no way related to funerals or the area, then what is the relevance?

Q11

The CMA has provisionally decided to prohibit funeral directors from making payments to, or engaging in arrangements with, hospices, care homes and other similar institutions, which encourage or incentivise those institutions to refer customers to the funeral director (paragraph 34).Please provide your comments to the CMA on this proposed prohibition.

I agree entirely that a "per case" "gratuity" (aka bribe) is entirely inappropriate.

What however if more general community support, information sessions, relationship building?

I do believe, kick backs to insurance companies in the pre-paid market also need stopped. I raised this with NAFD years ago when it started.

Worth noting that the recent Police Scotland tender specifically asked what return the successful bidders would be making by way of community support!!

Q12

Also in paragraph 34, the CMA has provisionally decided to prohibit funeral directors from soliciting for business through coroner and police contracts.Please provide your comments to the CMA on this proposed prohibition.

This has long Since been written into Contracts. How well it is enforced may vary.

As a contractor I agree entirely that we should not solicit business.

We are however and rightly so allowed to give our details should a family representative ask for them.

Q13

In paragraph 9.21, the CMA has provisionally decided to recommend to the UK government and devolved administrations in Wales and Northern Ireland, that they should establish an inspection and registration regime to monitor the quality of funeral director services as a first step in the direction of a broader regulatory regime for funeral services in England, Wales and Northern Ireland. Please provide your comments to the CMA on this proposed prohibition.

Great idea. So long as there is a clear criteria.

Q14

Please use the box below to provide the CMA with any other comments you have on the Provisional Decision Report and associated appendices.

They are wrong to say that increased personalisation of funerals, or increased time scales do not increase cost. Of course they both do! As do increasing numbers of bariatric cases.

I'm happy with more online pricing. It needs audited however. It is too easy to advertise a cheap price then up sell once the client is in the office. A clear breach of trust.

It should be remembered that the funeral profession is not entirely unique. There are many "distress" purchases which people make with little understanding of what they are buying. Potentially including car repair, trades, personal care and financial advice.

The legal position is "buyer beware". But yes, let's make it easy for our bereaved families and help make sure they get honest and fair service.

#4

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Page 1

Q1

What is the name of your business?

Silletts

Q2**England**In which of the UK nations does your business operate?
(tick all that apply)**Q3**

How many funeral homes do you operate?

2

Q4

In paragraph 16 of the Provisional Decision report, the CMA estimates that the consumer detriment (over-payment) arising from lack of effective competition between funeral directors is at least £400 per funeral, on average, across a significant proportion of the market (i.e. customers of both large and many small firms). Please provide your comments to the CMA on this estimation, in particular in the context of your own business.

Consumers are more aware than ever. In our own area there is more choice than ever. We are weekly contacted by new clients who have been in to the offices of the larger firms and been prepared to leave once they realise that the advertised leading price is not really a full funeral as they expect. There is many choices at the budget end to.

Q5

In paragraph 9.160 the CMA proposes that all funeral firms with five or more branches should have to provide the CMA with the total number of funerals provided each quarter and the total revenue (excluding disbursements) per funeral during that quarter. For firms with more than ten branches this will need to be further broken down by funeral type. There is no specified end date to this requirement. Please provide your comments to the CMA on this proposed requirement.

Unfair and will only promote the selling of independent businesses to the corporates. Many business owners will not want or need this financial scrutiny? Is this why funeral partners have been so quiet on this subject. They along with COOP and Dignity will be waiting to swoop and these are the very businesses that have created the inquiry.

Q6

If your funeral firm has more than five branches, will this quarterly monitoring requirement incur any costs on the part of your business? If yes or not sure, please explain to the CMA what you believe these costs will or may be comprised of.

Yes,

Please provide more detail:

Obviously we have not but how can it not?

Q7

In paragraph 9.24 the CMA has provisionally decided to require all funeral directors to provide customers with information on the price of their: a) most commonly sold funeral package; b) standard funeral package (if different); and c) the simplest funeral package they offer. Please provide your comments to the CMA on this proposed requirement.

Packages again suit the large firms. Most of us think funerals are individual and bespoke. Just publish prices and let consumers choose what they want. In our own experience consumers trust us and it is actually us that have to bring up cost for them and it still causes upset in some circumstances.

Q8

In paragraph 9.28, the CMA has provisionally decided to require all funeral directors to provide customers with information on the price information of crematorium operators within a 30-minute cortege drive time from their business premises. Please provide your comments to the CMA on this proposed requirement.

No problem but they will still go where they want. Our very local dignity crematorium is nearly 300 pounds dearer than the previously local one. The family still go to the nearest!!

Q9

In paragraph 9.27, the CMA has provisionally decided to require all funeral directors to provide customers with details of their terms of business, specifically: a) the size of upfront deposit required; b) when the deposit and final balance must be paid; c) any available payment options for paying the deposit balance; and d) any charges for late payment. Please provide your comments to the CMA on this proposed requirement.

This can and does vary?

It would disadvantage the less well off. At present we have 9 families paying monthly and this figure is always about the same. We judge who can and cannot be trusted and this would change this. At present in most cases we take no deposit.

Q10

The CMA has provisionally decided to require funeral directors to make available to customers, both at their premises and online, clear and prominent information about any charitable or gratuitous payments made by the business (paragraphs 32-33). Please provide your comments to the CMA on this proposed requirement.

Nonsense, as a small family business we would simply put these down as personal donations.

Q11

The CMA has provisionally decided to prohibit funeral directors from making payments to, or engaging in arrangements with, hospices, care homes and other similar institutions, which encourage or incentivise those institutions to refer customers to the funeral director (paragraph 34). Please provide your comments to the CMA on this proposed prohibition.

Good, that sort of behaviour is bent!!

Q12

Also in paragraph 34, the CMA has provisionally decided to prohibit funeral directors from soliciting for business through coroner and police contracts. Please provide your comments to the CMA on this proposed prohibition.

A/A

Q13

In paragraph 9.21, the CMA has provisionally decided to recommend to the UK government and devolved administrations in Wales and Northern Ireland, that they should establish an inspection and registration regime to monitor the quality of funeral director services as a first step in the direction of a broader regulatory regime for funeral services in England, Wales and Northern Ireland. Please provide your comments to the CMA on this proposed prohibition.

Madness, costly and not needed. The work of NAFD and SAIF covers this just fine with limited cost for consumers.

Q14

Please use the box below to provide the CMA with any other comments you have on the Provisional Decision Report and associated appendices.

Already written to them

#5

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Page 1

Q1

What is the name of your business?

Rowland Brothers

Q2**England**In which of the UK nations does your business operate?
(tick all that apply)**Q3**

How many funeral homes do you operate?

10

Q4

In paragraph 16 of the Provisional Decision report, the CMA estimates that the consumer detriment (over-payment) arising from lack of effective competition between funeral directors is at least £400 per funeral, on average, across a significant proportion of the market (i.e. customers of both large and many small firms). Please provide your comments to the CMA on this estimation, in particular in the context of your own business.

prices vary widely as you have stated, so how can you place a figure per funeral on client detriment? Furthermore the quality of services offered varies widely - you are comparing rolls royces with Fiat pandas - it simply isnt possible to do so.

Q5

In paragraph 9.160 the CMA proposes that all funeral firms with five or more branches should have to provide the CMA with the total number of funerals provided each quarter and the total revenue (excluding disbursements) per funeral during that quarter. For firms with more than ten branches this will need to be further broken down by funeral type. There is no specified end date to this requirement. Please provide your comments to the CMA on this proposed requirement.

The effort required to do this will push up costs to the client - surely this approach is detrimental to the consumer and against the goal you are trying to achieve. it would appear that your approach is to exclude the smaller players where considerable quality issues exist

Q6

If your funeral firm has more than five branches, will this quarterly monitoring requirement incur any costs on the part of your business? If yes or not sure, please explain to the CMA what you believe these costs will or may be comprised of.

Yes,

Please provide more detail:
additional time required from accountants - additional software support to collate and record such information

Q7

In paragraph 9.24 the CMA has provisionally decided to require all funeral directors to provide customers with information on the price of their: a) most commonly sold funeral package; b) standard funeral package (if different); and c) the simplest funeral package they offer. Please provide your comments to the CMA on this proposed requirement.

we dont sell packages - the vast majority of our funerals are bespoke

Q8

In paragraph 9.28, the CMA has provisionally decided to require all funeral directors to provide customers with information on the price information of crematorium operators within a 30-minute cortege drive time from their business premises. Please provide your comments to the CMA on this proposed requirement.

we do this already

Q9

In paragraph 9.27, the CMA has provisionally decided to require all funeral directors to provide customers with details of their terms of business, specifically: a) the size of upfront deposit required; b) when the deposit and final balance must be paid; c) any available payment options for paying the deposit balance; and d) any charges for late payment. Please provide your comments to the CMA on this proposed requirement.

we provide already

Q10

The CMA has provisionally decided to require funeral directors to make available to customers, both at their premises and online, clear and prominent information about any charitable or gratuitous payments made by the business (paragraphs 32-33). Please provide your comments to the CMA on this proposed requirement.

we provide details of our charitable arm already however I suspect the cma is trying to eradicate payments and so called to nursing and care homes. This legislation wont affect such donations as many of them are not recorded and under the table.

Q11

The CMA has provisionally decided to prohibit funeral directors from making payments to, or engaging in arrangements with, hospices, care homes and other similar institutions, which encourage or incentivise those institutions to refer customers to the funeral director (paragraph 34). Please provide your comments to the CMA on this proposed prohibition.

Isn't this part of the bribery act already? such organisations use specific funeral directors because of the quality of the service they provide.

Q12

Also in paragraph 34, the CMA has provisionally decided to prohibit funeral directors from soliciting for business through coroner and police contracts. Please provide your comments to the CMA on this proposed prohibition.

the relatives of the decd under the coroners jurisdiction want to know where the fd is taking the decd and who the fd is if they have any questions they can call them - if you do not provide such information then you are not assisting the bereaved - is this goal of the CMA?

Q13

In paragraph 9.21, the CMA has provisionally decided to recommend to the UK government and devolved administrations in Wales and Northern Ireland, that they should establish an inspection and registration regime to monitor the quality of funeral director services as a first step in the direction of a broader regulatory regime for funeral services in England, Wales and Northern Ireland. Please provide your comments to the CMA on this proposed prohibition.

excellent but it must apply to everyone not just companies over 10 branches

Q14

Please use the box below to provide the CMA with any other comments you have on the Provisional Decision Report and associated appendices.

I agree with the licencing of all funerals directors and an inspector as long as it applies to all. I do not agree with the pricing regulation. It is clearly wrong, does not fit with our capitalist society and is effectively nationalising the funeral industry. You will essentially cause a huge sell off in the industry polarising the industry into two or three large companies which in turn will increase costs to the consumer.

#8

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Q1

What is the name of your business?

Gillotts Funeral Directors

Q2**England**In which of the UK nations does your business operate?
(tick all that apply)**Q3**

How many funeral homes do you operate?

5

Q4

In paragraph 16 of the Provisional Decision report, the CMA estimates that the consumer detriment (over-payment) arising from lack of effective competition between funeral directors is at least £400 per funeral, on average, across a significant proportion of the market (i.e. customers of both large and many small firms). Please provide your comments to the CMA on this estimation, in particular in the context of your own business.

Prices between firms in our area definitely vary by this amount, with the smaller independent firms being at the lower end and Dignity being at the higher end - we are somewhere in the middle.

Q5

In paragraph 9.160 the CMA proposes that all funeral firms with five or more branches should have to provide the CMA with the total number of funerals provided each quarter and the total revenue (excluding disbursements) per funeral during that quarter. For firms with more than ten branches this will need to be further broken down by funeral type. There is no specified end date to this requirement. Please provide your comments to the CMA on this proposed requirement.

If they are looking at prices then they should also look at operating costs. A firm which invests money in staff, vehicles and premises and charges an appropriate amount to cover these costs and make a fair profit should not be penalised over a firm which invests as little as possible and takes out a huge profit.

Q6**Not sure**

If your funeral firm has more than five branches, will this quarterly monitoring requirement incur any costs on the part of your business? If yes or not sure, please explain to the CMA what you believe these costs will or may be comprised of.

Q7

In paragraph 9.24 the CMA has provisionally decided to require all funeral directors to provide customers with information on the price of their: a) most commonly sold funeral package; b) standard funeral package (if different); and c) the simplest funeral package they offer. Please provide your comments to the CMA on this proposed requirement.

Once you get above the most basic funeral, we have no such thing as a 'funeral package' - we ask them what they want and we price it accordingly.

Q8

In paragraph 9.28, the CMA has provisionally decided to require all funeral directors to provide customers with information on the price information of crematorium operators within a 30-minute cortege drive time from their business premises. Please provide your comments to the CMA on this proposed requirement.

Won't make any difference on the decision made in about 95% of cases. However, if they do do this, then they should also insist on making other information available, such as service time, facilities e.g. webcasting and their costs, photos of the chapels, number of chapels, parking availability so that people can actually make an informed choice.

Q9

In paragraph 9.27, the CMA has provisionally decided to require all funeral directors to provide customers with details of their terms of business, specifically: a) the size of upfront deposit required; b) when the deposit and final balance must be paid; c) any available payment options for paying the deposit balance; and d) any charges for late payment. Please provide your comments to the CMA on this proposed requirement.

Yes this seems fair and we do this as a matter of course.

Q10

The CMA has provisionally decided to require funeral directors to make available to customers, both at their premises and online, clear and prominent information about any charitable or gratuitous payments made by the business (paragraphs 32-33). Please provide your comments to the CMA on this proposed requirement.

Fine, as long as the CMA is going to investigate rumours of unreported gratuities e.g. payments to nursing homes etc for recommendations.

Q11

The CMA has provisionally decided to prohibit funeral directors from making payments to, or engaging in arrangements with, hospices, care homes and other similar institutions, which encourage or incentivise those institutions to refer customers to the funeral director (paragraph 34). Please provide your comments to the CMA on this proposed prohibition.

Good. Needs to be policed.

Q12

Also in paragraph 34, the CMA has provisionally decided to prohibit funeral directors from soliciting for business through coroner and police contracts. Please provide your comments to the CMA on this proposed prohibition.

Good, although how will this be policed?

Q13

In paragraph 9.21, the CMA has provisionally decided to recommend to the UK government and devolved administrations in Wales and Northern Ireland, that they should establish an inspection and registration regime to monitor the quality of funeral director services as a first step in the direction of a broader regulatory regime for funeral services in England, Wales and Northern Ireland. Please provide your comments to the CMA on this proposed prohibition.

As long as this does not unduly benefit larger firms who are better able to comply and lead to smaller firms selling up because it's too expensive.

Q14

Please use the box below to provide the CMA with any other comments you have on the Provisional Decision Report and associated appendices.

Advertising needs looking at - firms like the Co-op and Dignity benefit from huge economies of scale when it comes to Advertising, and can also make use of more expensive media such as TV and radio which smaller independent firms cannot. So if the aim is to reduce their competitive advantage and give smaller firms a fair chance then this needs to be taken into account too.

#9

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Page 1

Q1

What is the name of your business?

Regency Funeral Services

Q2**England**In which of the UK nations does your business operate?
(tick all that apply)**Q3**

How many funeral homes do you operate?

one

Q4

In paragraph 16 of the Provisional Decision report, the CMA estimates that the consumer detriment (over-payment) arising from lack of effective competition between funeral directors is at least £400 per funeral, on average, across a significant proportion of the market (i.e. customers of both large and many small firms). Please provide your comments to the CMA on this estimation, in particular in the context of your own business.

I believe this to be misinformation. as one of four small independent businesses with a one mile radius of each, we stay competitive. We do not attempt to compete with the local CO-OP or Dignity funeral homes

Q5

In paragraph 9.160 the CMA proposes that all funeral firms with five or more branches should have to provide the CMA with the total number of funerals provided each quarter and the total revenue (excluding disbursements) per funeral during that quarter. For firms with more than ten branches this will need to be further broken down by funeral type. There is no specified end date to this requirement. Please provide your comments to the CMA on this proposed requirement.

no comment

Q6

If your funeral firm has more than five branches, will this quarterly monitoring requirement incur any costs on the part of your business? If yes or not sure, please explain to the CMA what you believe these costs will or may be comprised of.

Please provide more detail:

N/A

Q7

In paragraph 9.24 the CMA has provisionally decided to require all funeral directors to provide customers with information on the price of their: a) most commonly sold funeral package; b) standard funeral package (if different); and c) the simplest funeral package they offer. Please provide your comments to the CMA on this proposed requirement.

this is something we already do as a business via advertising, facebook, website, in office, over the telephone. we are very open about our pricing structure.

Q8

In paragraph 9.28, the CMA has provisionally decided to require all funeral directors to provide customers with information on the price information of crematorium operators within a 30-minute cortege drive time from their business premises. Please provide your comments to the CMA on this proposed requirement.

this is something we already do. We believe the families have the right to choose which crematorium they attend.

Q9

In paragraph 9.27, the CMA has provisionally decided to require all funeral directors to provide customers with details of their terms of business, specifically: a) the size of upfront deposit required; b) when the deposit and final balance must be paid; c) any available payment options for paying the deposit balance; and d) any charges for late payment. Please provide your comments to the CMA on this proposed requirement.

this is something we already have in place. An estimated cost during the arranging of the funeral is left with the family. Any further expense not discussed at that time is what the family choose to add at a later date. Our terms of settlement are very clear.

Q10

The CMA has provisionally decided to require funeral directors to make available to customers, both at their premises and online, clear and prominent information about any charitable or gratuitous payments made by the business (paragraphs 32-33). Please provide your comments to the CMA on this proposed requirement.

this is something we do. by displaying certificates from chosen charities or our FB page

Q11

The CMA has provisionally decided to prohibit funeral directors from making payments to, or engaging in arrangements with, hospices, care homes and other similar institutions, which encourage or incentivise those institutions to refer customers to the funeral director (paragraph 34). Please provide your comments to the CMA on this proposed prohibition.

this is a practice that my business has never done. If someone in the listed settings recommends us because of their personal experience of our services, we cannot be held responsible for this.

Q12

Also in paragraph 34, the CMA has provisionally decided to prohibit funeral directors from soliciting for business through coroner and police contracts. Please provide your comments to the CMA on this proposed prohibition.

N/A

Q13

In paragraph 9.21, the CMA has provisionally decided to recommend to the UK government and devolved administrations in Wales and Northern Ireland, that they should establish an inspection and registration regime to monitor the quality of funeral director services as a first step in the direction of a broader regulatory regime for funeral services in England, Wales and Northern Ireland. Please provide your comments to the CMA on this proposed prohibition.

As a member of the NAFD we maintain a high standard of premises, care of the Deceased and advice to the families. The NAFD randomly inspect funeral homes that are registered with them.

Q14

Please use the box below to provide the CMA with any other comments you have on the Provisional Decision Report and associated appendices.

I found the report to focus mainly on the very large companies, their practices do not always convey the practices of the small independent family run businesses.

Therefore I found some of the summaries to be inconclusive. I have read the full report, overall there are some areas that need to be addressed in the industry, but in my opinion I think more notice should have been taken of the NAFD feedback and SAIF. As in all industries there are good and poor practices, but the funeral industry for outsiders to judge is very difficult, as the general public, do NOT WANT to know of its existence until it is needed. Yes there is a change happening very slowly of families shopping around and wanting more say, but many don't. The summary is correct of its interpretation to the general public. But any forward thinking owner of a funeral home, will evolve with the changes that have taken place already and are continuing to slowly come via the needs of the general public, and in my opinion this is where large companies will struggle because they are too business orientated. As an industry we offer a care service, this is something that gets overlooked by a minority in this industry.

A final reference to training, you can have a person that has had all the training, has all the certificates, etc but you cannot teach the life experience, compassion and care that comes instinctively with this industry. There are a lot of people in this industry who feel passionately about what they do, they dedicate their lives to the job, at the expense of family time, etc. they should not be made to feel inadequate or unacceptable because they have no certificates or diplomas to show how good and dedicated they are. They have trained the practical way through actually doing the job, and their experience should be given merit.

#11

COMPLETE

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Page 1

Q1

What is the name of your business?

Heart of England Co-operative Society Ltd t/a The Co-operative Funeralcare

Q2**England**In which of the UK nations does your business operate?
(tick all that apply)**Q3**

How many funeral homes do you operate?

15

Q4

In paragraph 16 of the Provisional Decision report, the CMA estimates that the consumer detriment (over-payment) arising from lack of effective competition between funeral directors is at least £400 per funeral, on average, across a significant proportion of the market (i.e. customers of both large and many small firms). Please provide your comments to the CMA on this estimation, in particular in the context of your own business.

We know there is a price differential between ourselves and Dignity and the Co-op Group, our families who have chosen to shop around have told us of these large differences, but, surely this is what you will find in any market.

From our limited research we have found that our prices are generally in line with those of our competitors, and well below those of the larger corporate's.

The hardest thing to compare when looking at price in isolation is how it compares to the quality of what is provided and this is where the CMA has failed miserably. To only visit 15 funeral homes out of a market size of nearly 7,000 locations seems woefully inadequate and then to cast aspersions on the whole profession by alluding to profiteering in general, when we know from our own business that the money we invest in our colleagues, premises and vehicles out strips what many others invest locally in their businesses, feels disingenuous.

Q5

In paragraph 9.160 the CMA proposes that all funeral firms with five or more branches should have to provide the CMA with the total number of funerals provided each quarter and the total revenue (excluding disbursements) per funeral during that quarter. For firms with more than ten branches this will need to be further broken down by funeral type. There is no specified end date to this requirement. Please provide your comments to the CMA on this proposed requirement.

We are happy to provide this information, if this is what the CMA feels is required. But what happens then, the CMA say they will 'assess and monitor' but will this data be used to show which firms are exceeding norms and used to make them address any consumer detriment?

Q6

If your funeral firm has more than five branches, will this quarterly monitoring requirement incur any costs on the part of your business? If yes or not sure, please explain to the CMA what you believe these costs will or may be comprised of.

Yes,

Please provide more detail:

But the cost will not be excessive and will become part of our 'business as usual' operation

Q7

In paragraph 9.24 the CMA has provisionally decided to require all funeral directors to provide customers with information on the price of their: a) most commonly sold funeral package; b) standard funeral package (if different); and c) the simplest funeral package they offer. Please provide your comments to the CMA on this proposed requirement.

We have already been providing this information on our Price List, which is available from our locations and online for a number of years, so no major changes for us - what we have not previously done is 'package' our funerals, as we have preferred to offer our client families the full range of options to enable them to arrange a bespoke service for their loved one.

Q8

In paragraph 9.28, the CMA has provisionally decided to require all funeral directors to provide customers with information on the price information of crematorium operators within a 30-minute cortege drive time from their business premises. Please provide your comments to the CMA on this proposed requirement.

Again if this is something that the CMA thinks will help our client families then we are happy to oblige, although we know from experience that the majority of our families know where they want the cremation to take place due to the historical context of holding previous family funerals at the crematorium that is nearest to them. This may change if a new crematorium opens locally but again this would usually be judged in terms of distance / drive time from the residence to the crematorium and we note that it is a decision rarely motivated by a saving on the crematorium fee

Q9

In paragraph 9.27, the CMA has provisionally decided to require all funeral directors to provide customers with details of their terms of business, specifically: a) the size of upfront deposit required; b) when the deposit and final balance must be paid; c) any available payment options for paying the deposit balance; and d) any charges for late payment. Please provide your comments to the CMA on this proposed requirement.

We already comply in terms of points 'a', 'b' and 'd'. We did historically offer an interest bearing payment plan but in the 12 months of operation it was never requested, hence we withdrew the product due to lack of demand. If the CMA feels this would be beneficial then we would implement.

Q10

The CMA has provisionally decided to require funeral directors to make available to customers, both at their premises and online, clear and prominent information about any charitable or gratuitous payments made by the business (paragraphs 32-33). Please provide your comments to the CMA on this proposed requirement.

We do not make any such payments and I don't think many established funeral business would participate in this type of behaviour as it goes against what many of us have agreed to abide by in terms of the codes of conduct or codes of practice that we have signed up to when joining the professions trade bodies.

Perhaps the culprits should be 'named and shamed' as it is not something I or many of my colleagues would expect to see in the profession .

Q11

The CMA has provisionally decided to prohibit funeral directors from making payments to, or engaging in arrangements with, hospices, care homes and other similar institutions, which encourage or incentivise those institutions to refer customers to the funeral director (paragraph 34). Please provide your comments to the CMA on this proposed prohibition.

We do not make any such payments and I don't think many established funeral business would participate in this type of behaviour as it goes against what many of us have agreed to abide by in terms of the codes of conduct or codes of practice that we have signed up to when joining the professions trade bodies.

Perhaps the culprits should be 'named and shamed' as it is not something I or many of my colleagues would expect to see in the profession .

Q12

Also in paragraph 34, the CMA has provisionally decided to prohibit funeral directors from soliciting for business through coroner and police contracts. Please provide your comments to the CMA on this proposed prohibition.

Most Police or Coroners contracts has this caveat included, however, over time the constant downward pressure around cost from the contract owner has lead to a situation where some providers tried to gain a commercial advantage in order to justify the not insignificant costs of operating at a very low tendered value or even at a zero or negative tender.

We welcome the idea but would be interested to see how the aforementioned authorities will deal with the proposal

Q13

In paragraph 9.21, the CMA has provisionally decided to recommend to the UK government and devolved administrations in Wales and Northern Ireland, that they should establish an inspection and registration regime to monitor the quality of funeral director services as a first step in the direction of a broader regulatory regime for funeral services in England, Wales and Northern Ireland. Please provide your comments to the CMA on this proposed prohibition.

We welcome the proposal of a Funeral Inspector for the UK as we believe we are operating to a very high standard already

Q14

Please use the box below to provide the CMA with any other comments you have on the Provisional Decision Report and associated appendices.

None

#12

COMPLETE

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Page 1

Q1

What is the name of your business?

DAVID BUTTON INDEPENDENT FUNERAL DIRECTORS

Q2**England**In which of the UK nations does your business operate?
(tick all that apply)**Q3**

How many funeral homes do you operate?

ONE

Q4

In paragraph 16 of the Provisional Decision report, the CMA estimates that the consumer detriment (over-payment) arising from lack of effective competition between funeral directors is at least £400 per funeral, on average, across a significant proportion of the market (i.e. customers of both large and many small firms). Please provide your comments to the CMA on this estimation, in particular in the context of your own business.

All prices of funerals should be online and made clear from the off.

Q5

In paragraph 9.160 the CMA proposes that all funeral firms with five or more branches should have to provide the CMA with the total number of funerals provided each quarter and the total revenue (excluding disbursements) per funeral during that quarter. For firms with more than ten branches this will need to be further broken down by funeral type. There is no specified end date to this requirement. Please provide your comments to the CMA on this proposed requirement.

Why would this be needed?

Q6

If your funeral firm has more than five branches, will this quarterly monitoring requirement incur any costs on the part of your business? If yes or not sure, please explain to the CMA what you believe these costs will or may be comprised of.

Please provide more detail:

N/A

Q7

In paragraph 9.24 the CMA has provisionally decided to require all funeral directors to provide customers with information on the price of their: a) most commonly sold funeral package; b) standard funeral package (if different); and c) the simplest funeral package they offer. Please provide your comments to the CMA on this proposed requirement.

We do this and have done since the start of the business.

Q8

In paragraph 9.28, the CMA has provisionally decided to require all funeral directors to provide customers with information on the price information of crematorium operators within a 30-minute cortege drive time from their business premises. Please provide your comments to the CMA on this proposed requirement.

A nice idea, especially for the bigger cities where costs can vary.

Q9

In paragraph 9.27, the CMA has provisionally decided to require all funeral directors to provide customers with details of their terms of business, specifically: a) the size of upfront deposit required; b) when the deposit and final balance must be paid; c) any available payment options for paying the deposit balance; and d) any charges for late payment. Please provide your comments to the CMA on this proposed requirement.

Agree.

But.....how restricted are these?

Q10

The CMA has provisionally decided to require funeral directors to make available to customers, both at their premises and online, clear and prominent information about any charitable or gratuitous payments made by the business (paragraphs 32-33). Please provide your comments to the CMA on this proposed requirement.

Can't say I agree with this at all. It is a tad nosy and what business is it of anyone else?

Q11

The CMA has provisionally decided to prohibit funeral directors from making payments to, or engaging in arrangements with, hospices, care homes and other similar institutions, which encourage or incentivise those institutions to refer customers to the funeral director (paragraph 34). Please provide your comments to the CMA on this proposed prohibition.

Hmmm, I see where they are going with this but often in the past we have donated prizes to a raffle, helped when they have raised money and sometimes funeral donations are made to certain homes.

More clarity needed.

Q12

Also in paragraph 34, the CMA has provisionally decided to prohibit funeral directors from soliciting for business through coroner and police contracts. Please provide your comments to the CMA on this proposed prohibition.

It happens and I doubt you will be able to fully stop it.

Q13

In paragraph 9.21, the CMA has provisionally decided to recommend to the UK government and devolved administrations in Wales and Northern Ireland, that they should establish an inspection and registration regime to monitor the quality of funeral director services as a first step in the direction of a broader regulatory regime for funeral services in England, Wales and Northern Ireland. Please provide your comments to the CMA on this proposed prohibition.

Agree.

Q14

Please use the box below to provide the CMA with any other comments you have on the Provisional Decision Report and associated appendices.

N/A

#13

COMPLETE

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Page 1

Q1

What is the name of your business?

Jack Warwick Funeral Service

Q2**England**In which of the UK nations does your business operate?
(tick all that apply)**Q3**

How many funeral homes do you operate?

One

Q4

In paragraph 16 of the Provisional Decision report, the CMA estimates that the consumer detriment (over-payment) arising from lack of effective competition between funeral directors is at least £400 per funeral, on average, across a significant proportion of the market (i.e. customers of both large and many small firms). Please provide your comments to the CMA on this estimation, in particular in the context of your own business.

We are one of 5 funeral directors to operate in Kettering. Market forces and strong competition from other firms means that prices are kept to a minimum in an effort to remain competitive. We have been established since 1985 and pride ourselves on our ethical approach. We strongly refute any allegation of over pricing.

Q5

In paragraph 9.160 the CMA proposes that all funeral firms with five or more branches should have to provide the CMA with the total number of funerals provided each quarter and the total revenue (excluding disbursements) per funeral during that quarter. For firms with more than ten branches this will need to be further broken down by funeral type. There is no specified end date to this requirement. Please provide your comments to the CMA on this proposed requirement.

We have no objection to this.

Q6

If your funeral firm has more than five branches, will this quarterly monitoring requirement incur any costs on the part of your business? If yes or not sure, please explain to the CMA what you believe these costs will or may be comprised of.

Not sure,

Please provide more detail:

We only operate from one funeral home.

Q7

In paragraph 9.24 the CMA has provisionally decided to require all funeral directors to provide customers with information on the price of their: a) most commonly sold funeral package; b) standard funeral package (if different); and c) the simplest funeral package they offer. Please provide your comments to the CMA on this proposed requirement.

We do not sell 'funeral packages'. We listen to the client family and provide exactly what is requested. Obviously, we offer guidance so that an informed decision may be made.

Q8

In paragraph 9.28, the CMA has provisionally decided to require all funeral directors to provide customers with information on the price information of crematorium operators within a 30-minute cortege drive time from their business premises. Please provide your comments to the CMA on this proposed requirement.

We have no objection to this.

Q9

In paragraph 9.27, the CMA has provisionally decided to require all funeral directors to provide customers with details of their terms of business, specifically: a) the size of upfront deposit required; b) when the deposit and final balance must be paid; c) any available payment options for paying the deposit balance; and d) any charges for late payment. Please provide your comments to the CMA on this proposed requirement.

We have no objection to this. We do not ask for any payment before the funeral takes place. We send an account to the family usually a week after the funeral and our terms are 30 days. However, we are always happy to discuss individual payment terms if requested.

Q10

The CMA has provisionally decided to require funeral directors to make available to customers, both at their premises and online, clear and prominent information about any charitable or gratuitous payments made by the business (paragraphs 32-33). Please provide your comments to the CMA on this proposed requirement.

We have no objections to this.

Q11

The CMA has provisionally decided to prohibit funeral directors from making payments to, or engaging in arrangements with, hospices, care homes and other similar institutions, which encourage or incentivise those institutions to refer customers to the funeral director (paragraph 34). Please provide your comments to the CMA on this proposed prohibition.

We have no objections to this. We have never operated in this way.

Q12

Also in paragraph 34, the CMA has provisionally decided to prohibit funeral directors from soliciting for business through coroner and police contracts. Please provide your comments to the CMA on this proposed prohibition.

We have no objection to this.

Q13

In paragraph 9.21, the CMA has provisionally decided to recommend to the UK government and devolved administrations in Wales and Northern Ireland, that they should establish an inspection and registration regime to monitor the quality of funeral director services as a first step in the direction of a broader regulatory regime for funeral services in England, Wales and Northern Ireland. Please provide your comments to the CMA on this proposed prohibition.

We have no objections to this. We would welcome any registration scheme.

Q14

Respondent skipped this question

Please use the box below to provide the CMA with any other comments you have on the Provisional Decision Report and associated appendices.

#16

COMPLETE

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Page 1

Q1

What is the name of your business?

W. Uden & Sons Ltd

Q2**England**In which of the UK nations does your business operate?
(tick all that apply)**Q3**

How many funeral homes do you operate?

7

Q4

In paragraph 16 of the Provisional Decision report, the CMA estimates that the consumer detriment (over-payment) arising from lack of effective competition between funeral directors is at least £400 per funeral, on average, across a significant proportion of the market (i.e. customers of both large and many small firms). Please provide your comments to the CMA on this estimation, in particular in the context of your own business.

We disagree that there is a lack of competition between funeral directors. We have 7 branches and within a mile radius of each, there are at least 5 competitors. We encourage the families that we care for to seek costings from other firms as we feel that what we offer is superior to what they offer. We also find in our local areas that the costing is very competitive, and only Dignity and Co-op are charging around £1000 more than independent businesses.

Q5

In paragraph 9.160 the CMA proposes that all funeral firms with five or more branches should have to provide the CMA with the total number of funerals provided each quarter and the total revenue (excluding disbursements) per funeral during that quarter. For firms with more than ten branches this will need to be further broken down by funeral type. There is no specified end date to this requirement. Please provide your comments to the CMA on this proposed requirement.

We disagree with this statement. Why should companies with less than 5 branches effectively get away with charging what they like, when we have to provide the data requested? I also feel by doing this that it would give smaller business possibly the ability to charge more as they would not be having to provide their data.

Q6

If your funeral firm has more than five branches, will this quarterly monitoring requirement incur any costs on the part of your business? If yes or not sure, please explain to the CMA what you believe these costs will or may be comprised of.

Yes,

Please provide more detail:

We are a very busy company, seeking to give the families that we care for the ultimate service, so having to provide this information on a regular basis would possibly lead to us having to employ a further staff member.

Q7

In paragraph 9.24 the CMA has provisionally decided to require all funeral directors to provide customers with information on the price of their: a) most commonly sold funeral package; b) standard funeral package (if different); and c) the simplest funeral package they offer. Please provide your comments to the CMA on this proposed requirement.

We already do this.

Q8

In paragraph 9.28, the CMA has provisionally decided to require all funeral directors to provide customers with information on the price information of crematorium operators within a 30-minute cortege drive time from their business premises. Please provide your comments to the CMA on this proposed requirement.

We already do this.

Q9

In paragraph 9.27, the CMA has provisionally decided to require all funeral directors to provide customers with details of their terms of business, specifically: a) the size of upfront deposit required; b) when the deposit and final balance must be paid; c) any available payment options for paying the deposit balance; and d) any charges for late payment. Please provide your comments to the CMA on this proposed requirement.

We already do all these things.

Q10

The CMA has provisionally decided to require funeral directors to make available to customers, both at their premises and online, clear and prominent information about any charitable or gratuitous payments made by the business (paragraphs 32-33). Please provide your comments to the CMA on this proposed requirement.

We do not offer gratuitous payments, so this would not be an issue. We rely on our reputation to attract business.

Q11

The CMA has provisionally decided to prohibit funeral directors from making payments to, or engaging in arrangements with, hospices, care homes and other similar institutions, which encourage or incentivise those institutions to refer customers to the funeral director (paragraph 34). Please provide your comments to the CMA on this proposed prohibition.

We do not offer gratuitous payments, so this would not be an issue. We rely on our reputation to attract business.

Q12

Also in paragraph 34, the CMA has provisionally decided to prohibit funeral directors from soliciting for business through coroner and police contracts. Please provide your comments to the CMA on this proposed prohibition.

We do not do this.

Q13

In paragraph 9.21, the CMA has provisionally decided to recommend to the UK government and devolved administrations in Wales and Northern Ireland, that they should establish an inspection and registration regime to monitor the quality of funeral director services as a first step in the direction of a broader regulatory regime for funeral services in England, Wales and Northern Ireland. Please provide your comments to the CMA on this proposed prohibition.

We would welcome a regulatory body.

Q14

Please use the box below to provide the CMA with any other comments you have on the Provisional Decision Report and associated appendices.

As state above, we would welcome a regulatory body. However, this would have to be under certain circumstances, such as who and how would quality of service be judged? AS a family business, we spend a very large amount on our premises, vehicles and staff, meaning that we are market leaders in service to the families that we care for. Being a family business since 1881, we are not in the business of ripping people off or overcharging, but are able to lower our prices when needed when family's circumstances dictate us doing this. We are acutely aware that our competitors are constantly seeking to undercut us in order for them to get more work, and we would be silly not to also attempt to compete with these businesses. Whilst doing this, we are still striving to offer a far superior service, meaning that we tend to spend considerably more on maintaining an excellent service than our competitors do. Ultimately, if our industry is regulated, I feel that the only way that it could be done is by every company should be regulated, not only those that are in the NAFD, otherwise companies will not seek membership of the NAFD. Regulatory bodies would need to be entirely independent, not made up of board members of larger funeral conglomerates. In an ideal world, funeral directors should be regulated, but we do not live in an ideal world. Feel free to call somebody who is not hiding behind corporate spreadsheets, or stuck in an office, but who is also actively involved in every dealing and aspect of the business.

Kind regards,

Matthew Uden

#17

COMPLETE

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Page 1

Q1

What is the name of your business?

Lincolnshire Co-operative Ltd

Q2**England**In which of the UK nations does your business operate?
(tick all that apply)**Q3**

How many funeral homes do you operate?

20 funeral homes plus 2 funeral arrangement offices

Q4

In paragraph 16 of the Provisional Decision report, the CMA estimates that the consumer detriment (over-payment) arising from lack of effective competition between funeral directors is at least £400 per funeral, on average, across a significant proportion of the market (i.e. customers of both large and many small firms). Please provide your comments to the CMA on this estimation, in particular in the context of your own business.

I believe that this is driven by areas where there is a concentration of Dignity, Co-op (i.e. Co-operative Group) and other large corporates. This generalisation overlooks the areas where there is healthy competition and good standards.

Q5

In paragraph 9.160 the CMA proposes that all funeral firms with five or more branches should have to provide the CMA with the total number of funerals provided each quarter and the total revenue (excluding disbursements) per funeral during that quarter. For firms with more than ten branches this will need to be further broken down by funeral type. There is no specified end date to this requirement. Please provide your comments to the CMA on this proposed requirement.

This will provide opportunities for unscrupulous single site/smaller operators to get away with unhealthy practice in terms of charges. I agree with the principle of monitoring the profession but this needs to include all businesses.

Q6

If your funeral firm has more than five branches, will this quarterly monitoring requirement incur any costs on the part of your business? If yes or not sure, please explain to the CMA what you believe these costs will or may be comprised of.

Yes,

Please provide more detail:

Whilst we monitor our business activities and revenue weekly, we operate this on a financial year which runs from September to September. I guess the CMA will be working on calendar year quarters so we could be running two lots of reports which will take up additional time.

Q7

In paragraph 9.24 the CMA has provisionally decided to require all funeral directors to provide customers with information on the price of their: a) most commonly sold funeral package; b) standard funeral package (if different); and c) the simplest funeral package they offer. Please provide your comments to the CMA on this proposed requirement.

Happy with this so long as the 'simplest package' does not mean Direct Cremation which is not, by definition, a funeral.

Q8

In paragraph 9.28, the CMA has provisionally decided to require all funeral directors to provide customers with information on the price information of crematorium operators within a 30-minute cortege drive time from their business premises. Please provide your comments to the CMA on this proposed requirement.

No concerns

Q9

In paragraph 9.27, the CMA has provisionally decided to require all funeral directors to provide customers with details of their terms of business, specifically: a) the size of upfront deposit required; b) when the deposit and final balance must be paid; c) any available payment options for paying the deposit balance; and d) any charges for late payment. Please provide your comments to the CMA on this proposed requirement.

We already provide this information to our customers, so no concerns with this.

Q10

The CMA has provisionally decided to require funeral directors to make available to customers, both at their premises and online, clear and prominent information about any charitable or gratuitous payments made by the business (paragraphs 32-33). Please provide your comments to the CMA on this proposed requirement.

No concerns.

Q11

The CMA has provisionally decided to prohibit funeral directors from making payments to, or engaging in arrangements with, hospices, care homes and other similar institutions, which encourage or incentivise those institutions to refer customers to the funeral director (paragraph 34). Please provide your comments to the CMA on this proposed prohibition.

Good! How will they monitor such institutions though? I believe it will require monitoring of the institutions as well as funeral directors

Q12

Also in paragraph 34, the CMA has provisionally decided to prohibit funeral directors from soliciting for business through coroner and police contracts. Please provide your comments to the CMA on this proposed prohibition.

We are involved in such contracts and these are the rules in place anyway, so no concerns with this.

Q13

In paragraph 9.21, the CMA has provisionally decided to recommend to the UK government and devolved administrations in Wales and Northern Ireland, that they should establish an inspection and registration regime to monitor the quality of funeral director services as a first step in the direction of a broader regulatory regime for funeral services in England, Wales and Northern Ireland. Please provide your comments to the CMA on this proposed prohibition.

Can't happen soon enough. The light needs shining on what our clients cannot see in terms of care of the deceased and the non-public areas of funeral homes.

Q14

Please use the box below to provide the CMA with any other comments you have on the Provisional Decision Report and associated appendices.

Very concerned at the amount of references to Co-op, particularly in respect of the fact they are considered £800 above the average cost per funeral. We are a Co-op, but not 'the Co-op' and I am very concerned that consumers will assume these references apply to us when in fact we are completely independent of them and our prices are below the national average. There is no attempt by the CMA to make clear that 'Co-op' is not 'All Co-ops'.

#19

COMPLETE

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Page 1

Q1

What is the name of your business?

F P Guiver & Sons Ltd

Q2**England**In which of the UK nations does your business operate?
(tick all that apply)**Q3**

How many funeral homes do you operate?

3

Q4

In paragraph 16 of the Provisional Decision report, the CMA estimates that the consumer detriment (over-payment) arising from lack of effective competition between funeral directors is at least £400 per funeral, on average, across a significant proportion of the market (i.e. customers of both large and many small firms). Please provide your comments to the CMA on this estimation, in particular in the context of your own business.

The over payment is not down to lack of competition but down to consumers gravitating to a well known brand like the Co-op rather than realising their local independent company can offer a more competitive price

Q5

In paragraph 9.160 the CMA proposes that all funeral firms with five or more branches should have to provide the CMA with the total number of funerals provided each quarter and the total revenue (excluding disbursements) per funeral during that quarter. For firms with more than ten branches this will need to be further broken down by funeral type. There is no specified end date to this requirement. Please provide your comments to the CMA on this proposed requirement.

This action is only going to increase companies overheads with additional administration and in consequence force the cost of funerals up

Q6

Respondent skipped this question

If your funeral firm has more than five branches, will this quarterly monitoring requirement incur any costs on the part of your business? If yes or not sure, please explain to the CMA what you believe these costs will or may be comprised of.

Q7

In paragraph 9.24 the CMA has provisionally decided to require all funeral directors to provide customers with information on the price of their: a) most commonly sold funeral package; b) standard funeral package (if different); and c) the simplest funeral package they offer. Please provide your comments to the CMA on this proposed requirement.

This doesn't help the client compare like with like as the most commonly sold package can vary between companies as can the other options

Q8

In paragraph 9.28, the CMA has provisionally decided to require all funeral directors to provide customers with information on the price information of crematorium operators within a 30-minute cortege drive time from their business premises. Please provide your comments to the CMA on this proposed requirement.

Most clients already know which crematorium they wish to use, normally due to location or previous funerals. The timing does not take into account traffic variations. 30 minutes in a city location could be 5 miles in a rural location could be 20 miles

Q9

In paragraph 9.27, the CMA has provisionally decided to require all funeral directors to provide customers with details of their terms of business, specifically: a) the size of upfront deposit required; b) when the deposit and final balance must be paid; c) any available payment options for paying the deposit balance; and d) any charges for late payment. Please provide your comments to the CMA on this proposed requirement.

This is already in our terms of business supplied to clients at the point of instruction

Q10

The CMA has provisionally decided to require funeral directors to make available to customers, both at their premises and online, clear and prominent information about any charitable or gratuitous payments made by the business (paragraphs 32-33). Please provide your comments to the CMA on this proposed requirement.

I'm not sure how this would help the client and could be misleading or if the company felt this would put them in a negative light the wording would be amended to their favour

Q11

The CMA has provisionally decided to prohibit funeral directors from making payments to, or engaging in arrangements with, hospices, care homes and other similar institutions, which encourage or incentivise those institutions to refer customers to the funeral director (paragraph 34). Please provide your comments to the CMA on this proposed prohibition.

I agree with this idea

Q12

Also in paragraph 34, the CMA has provisionally decided to prohibit funeral directors from soliciting for business through coroner and police contracts. Please provide your comments to the CMA on this proposed prohibition.

i agree with this

Q13

In paragraph 9.21, the CMA has provisionally decided to recommend to the UK government and devolved administrations in Wales and Northern Ireland, that they should establish an inspection and registration regime to monitor the quality of funeral director services as a first step in the direction of a broader regulatory regime for funeral services in England, Wales and Northern Ireland. Please provide your comments to the CMA on this proposed prohibition.

I'm unsure that a government inspector with no industry experience would be a good idea

Q14

Respondent skipped this question

Please use the box below to provide the CMA with any other comments you have on the Provisional Decision Report and associated appendices.

#20

COMPLETE

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Page 1

Q1

What is the name of your business?

Mark F H Rae Funerals

Q2

England

In which of the UK nations does your business operate?
(tick all that apply)

Q3

How many funeral homes do you operate?

one

Q4

In paragraph 16 of the Provisional Decision report, the CMA estimates that the consumer detriment (over-payment) arising from lack of effective competition between funeral directors is at least £400 per funeral, on average, across a significant proportion of the market (i.e. customers of both large and many small firms). Please provide your comments to the CMA on this estimation, in particular in the context of your own business.

We are lead to believe form our clients when ringing for the price that some are £600 more that ourselves

Q5

In paragraph 9.160 the CMA proposes that all funeral firms with five or more branches should have to provide the CMA with the total number of funerals provided each quarter and the total revenue (excluding disbursements) per funeral during that quarter. For firms with more than ten branches this will need to be further broken down by funeral type. There is no specified end date to this requirement. Please provide your comments to the CMA on this proposed requirement.

This is a good idea for the larger funeral firms

Q6

If your funeral firm has more than five branches, will this quarterly monitoring requirement incur any costs on the part of your business? If yes or not sure, please explain to the CMA what you believe these costs will or may be comprised of.

Please provide more detail:

NA

Q7

In paragraph 9.24 the CMA has provisionally decided to require all funeral directors to provide customers with information on the price of their: a) most commonly sold funeral package; b) standard funeral package (if different); and c) the simplest funeral package they offer. Please provide your comments to the CMA on this proposed requirement.

We offer our clients all the from simple to high range and it is for our clients to choose. Most of our client do know what they want before they contact us

Q8

In paragraph 9.28, the CMA has provisionally decided to require all funeral directors to provide customers with information on the price information of crematorium operators within a 30-minute cortege drive time from their business premises. Please provide your comments to the CMA on this proposed requirement.

We do this already but as we are so close to our local crematorium most choose our local

Q9

In paragraph 9.27, the CMA has provisionally decided to require all funeral directors to provide customers with details of their terms of business, specifically: a) the size of upfront deposit required; b) when the deposit and final balance must be paid; c) any available payment options for paying the deposit balance; and d) any charges for late payment. Please provide your comments to the CMA on this proposed requirement.

We proved term and conditions and estimate

Q10

The CMA has provisionally decided to require funeral directors to make available to customers, both at their premises and online, clear and prominent information about any charitable or gratuitous payments made by the business (paragraphs 32-33). Please provide your comments to the CMA on this proposed requirement.

This we have not done as yet

Q11

The CMA has provisionally decided to prohibit funeral directors from making payments to, or engaging in arrangements with, hospices, care homes and other similar institutions, which encourage or incentivise those institutions to refer customers to the funeral director (paragraph 34). Please provide your comments to the CMA on this proposed prohibition.

We have never done this but we do know of others in our area that do according to the local homes

Q12

Also in paragraph 34, the CMA has provisionally decided to prohibit funeral directors from soliciting for business through coroner and police contracts. Please provide your comments to the CMA on this proposed prohibition.

We are not involved with this But to stop any of this it would be batter if the coroners and officers had there own team for this work and not engage funeral directors . becuase we do know that cards are left with families and at time we have lost our ;local work

Q13

In paragraph 9.21, the CMA has provisionally decided to recommend to the UK government and devolved administrations in Wales and Northern Ireland, that they should establish an inspection and registration regime to monitor the quality of funeral director services as a first step in the direction of a broader regulatory regime for funeral services in England, Wales and Northern Ireland. Please provide your comments to the CMA on this proposed prohibition.

I agree

Q14

Respondent skipped this question

Please use the box below to provide the CMA with any other comments you have on the Provisional Decision Report and associated appendices.

#22

COMPLETE

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Page 1

Q1

What is the name of your business?

E. C. Thomas & Son

Q2**Wales**In which of the UK nations does your business operate?
(tick all that apply)**Q3**

How many funeral homes do you operate?

Two

Q4

In paragraph 16 of the Provisional Decision report, the CMA estimates that the consumer detriment (over-payment) arising from lack of effective competition between funeral directors is at least £400 per funeral, on average, across a significant proportion of the market (i.e. customers of both large and many small firms). Please provide your comments to the CMA on this estimation, in particular in the context of your own business.

We currently operate in an area of independent family funeral directors where there is effective competition keeping prices at an even level. Therefore this would mean that the suggested detriment of £400 would not apply in our area.

Q5

In paragraph 9.160 the CMA proposes that all funeral firms with five or more branches should have to provide the CMA with the total number of funerals provided each quarter and the total revenue (excluding disbursements) per funeral during that quarter. For firms with more than ten branches this will need to be further broken down by funeral type. There is no specified end date to this requirement. Please provide your comments to the CMA on this proposed requirement.

Our business would not be affected by this.

Q6

If your funeral firm has more than five branches, will this quarterly monitoring requirement incur any costs on the part of your business? If yes or not sure, please explain to the CMA what you believe these costs will or may be comprised of.

Please provide more detail:

N/A

Q7

In paragraph 9.24 the CMA has provisionally decided to require all funeral directors to provide customers with information on the price of their: a) most commonly sold funeral package; b) standard funeral package (if different); and c) the simplest funeral package they offer. Please provide your comments to the CMA on this proposed requirement.

When meeting with a family and understanding their requirements, based on the many options available, we provide an itemised estimate. The chosen arrangement/package is entirely down to the choices made by the client.

Q8

In paragraph 9.28, the CMA has provisionally decided to require all funeral directors to provide customers with information on the price information of crematorium operators within a 30-minute cortege drive time from their business premises. Please provide your comments to the CMA on this proposed requirement.

We would not have any problem with this, living in a rural area with only one crematorium in the county.

Q9

In paragraph 9.27, the CMA has provisionally decided to require all funeral directors to provide customers with details of their terms of business, specifically: a) the size of upfront deposit required; b) when the deposit and final balance must be paid; c) any available payment options for paying the deposit balance; and d) any charges for late payment. Please provide your comments to the CMA on this proposed requirement.

When we provide a written and detailed estimate to the family, prior to the funeral, the Terms and Conditions of Business are also given in print.

Q10

The CMA has provisionally decided to require funeral directors to make available to customers, both at their premises and online, clear and prominent information about any charitable or gratuitous payments made by the business (paragraphs 32-33). Please provide your comments to the CMA on this proposed requirement.

We would fully support this measure as we do not engage in this type of activity.

Q11

The CMA has provisionally decided to prohibit funeral directors from making payments to, or engaging in arrangements with, hospices, care homes and other similar institutions, which encourage or incentivise those institutions to refer customers to the funeral director (paragraph 34). Please provide your comments to the CMA on this proposed prohibition.

As our previous comment states, we do not agree with this practice and would therefore support the proposal made by the CMA.

Q12

Also in paragraph 34, the CMA has provisionally decided to prohibit funeral directors from soliciting for business through coroner and police contracts. Please provide your comments to the CMA on this proposed prohibition.

We fully agree with this proposal and feel this should not be permitted.

Q13

In paragraph 9.21, the CMA has provisionally decided to recommend to the UK government and devolved administrations in Wales and Northern Ireland, that they should establish an inspection and registration regime to monitor the quality of funeral director services as a first step in the direction of a broader regulatory regime for funeral services in England, Wales and Northern Ireland. Please provide your comments to the CMA on this proposed prohibition.

We fully agree that a mandatory inspection of premises should be carried out leading to regulation.

Q14

Please use the box below to provide the CMA with any other comments you have on the Provisional Decision Report and associated appendices.

Our priority as an independent family business is to ensure our families receive 100% attention. We base our business values on trust, transparency and reputation.

In many instances we go beyond the call of duty, which is always appreciated by our clients.

We feel the significant increase in the funeral costs over the years has been largely due to disbursements charges, over which we have no control. This, in turn, has inflated the funeral director's final account. We feel that the CMA should look closer at disbursement fees and charges ie. crematorium and burial fees, medical fees. Transparency of ownership is very important, especially where corporate firms purchase former independent businesses which retain the same name.

As a family business, we do not sell our services and products to families, but rather, outline all the alternatives, offering full choice based on quality, service and cost.

#23

COMPLETE

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Page 1

Q1

What is the name of your business?

V Morton & Sons Ltd

Q2**England**In which of the UK nations does your business operate?
(tick all that apply)**Q3**

How many funeral homes do you operate?

Three

Q4

In paragraph 16 of the Provisional Decision report, the CMA estimates that the consumer detriment (over-payment) arising from lack of effective competition between funeral directors is at least £400 per funeral, on average, across a significant proportion of the market (i.e. customers of both large and many small firms). Please provide your comments to the CMA on this estimation, in particular in the context of your own business.

We operate within a very competitive marketplace as there are a good mix of independent operators and groups. I think the CMA do not fully appreciate the amount of time which is invested into each funeral (certainly not in our case) which is immense and the ever increasing feuding politics between family members which seems to be escalating. Further, engaging the right calibre of staff is costly both in terms of training and their salaries. A comparison being drawn by the CMA can only be made if the parameters of service are identical and they recognise they are not. The calculation is therefore inherently flawed.

Q5

In paragraph 9.160 the CMA proposes that all funeral firms with five or more branches should have to provide the CMA with the total number of funerals provided each quarter and the total revenue (excluding disbursements) per funeral during that quarter. For firms with more than ten branches this will need to be further broken down by funeral type. There is no specified end date to this requirement. Please provide your comments to the CMA on this proposed requirement.

The concept of this is inherently flawed and I am surprised by their lack of foresight.

Q6

If your funeral firm has more than five branches, will this quarterly monitoring requirement incur any costs on the part of your business? If yes or not sure, please explain to the CMA what you believe these costs will or may be comprised of.

Please provide more detail:
We have only three branches.

Q7

In paragraph 9.24 the CMA has provisionally decided to require all funeral directors to provide customers with information on the price of their: a) most commonly sold funeral package; b) standard funeral package (if different); and c) the simplest funeral package they offer. Please provide your comments to the CMA on this proposed requirement.

The purchase of a "package" seems wholly inflexible. With the exception of a Direct Cremation option we operate on a bespoke system - this way the client pays ONLY for the items purchased and vague or often meaningless services do not obstruct clarity. We have three local Crematoria - two operate on 45 minutes intervals and one operates on thirty minutes intervals and so our time commitment can be different where say 5 staff are committed for 15 minutes longer at one venue against another - this can and should attract variations in costs. I would welcome clarity on the component items for a Direct Cremation so that clients could be sure of comparing like with like.

Q8

In paragraph 9.28, the CMA has provisionally decided to require all funeral directors to provide customers with information on the price information of crematorium operators within a 30-minute cortege drive time from their business premises. Please provide your comments to the CMA on this proposed requirement.

This should be in the public domain anyway as most Crematoria publish their prices online. However I accept that interpreting the fees structure does require some skill given that there are factors which affect the charges made - these include age restrictions, day of the week, locality fee, timing of the funeral, provision of organ, organist, containers for ashes, certificates together with penalties where documents are late being delivered (often at no fault of the FD), late arrival say because of illness, over-running, webcasting, recording, etc.

Q9

In paragraph 9.27, the CMA has provisionally decided to require all funeral directors to provide customers with details of their terms of business, specifically: a) the size of upfront deposit required; b) when the deposit and final balance must be paid; c) any available payment options for paying the deposit balance; and d) any charges for late payment. Please provide your comments to the CMA on this proposed requirement.

This is one area of the proposal I applaud. We do this as a norm in every case. However, clients are often distressed and frequently fail to read or take on board the implications of such terms despite the use of plain language rather than legal jargon. Quite how you overcome the distress factor in such a contract is significantly the most perplexing issue.

Q10

The CMA has provisionally decided to require funeral directors to make available to customers, both at their premises and online, clear and prominent information about any charitable or gratuitous payments made by the business (paragraphs 32-33). Please provide your comments to the CMA on this proposed requirement.

Absolutely agree!. Transparency on costs is paramount.

Q11

The CMA has provisionally decided to prohibit funeral directors from making payments to, or engaging in arrangements with, hospices, care homes and other similar institutions, which encourage or incentivise those institutions to refer customers to the funeral director (paragraph 34). Please provide your comments to the CMA on this proposed prohibition.

A number of such venues (including those within the NHS) no longer have Mortuary provision. We provide transfer and Mortuary provision for three such venues but DO NOT have client contact details. We are legally prohibited from contacting NOK in such circumstances. We do not receive any payments for such a service.

Q12

Also in paragraph 34, the CMA has provisionally decided to prohibit funeral directors from soliciting for business through coroner and police contracts. Please provide your comments to the CMA on this proposed prohibition.

I applaud this too. We have a Coroner's contractor (zero tender) who is suggesting to Care Home staff that they must use their firm for EVERY death simply on the basis that if the death becomes a Coroner's case they will be the only firm permitted to act. Because they act for H M Coroner there is significant gravitas (and an element of fear) attached to such statements. I would like to see Coroners Contracts being handled by a National Coroner's Transportation Service and taken out of the hands of Funeral Directors - such a service could be managed regionally. This would eliminate delays in providing a service to the Coroner and offer a better service to the bereaved.

Q13

In paragraph 9.21, the CMA has provisionally decided to recommend to the UK government and devolved administrations in Wales and Northern Ireland, that they should establish an inspection and registration regime to monitor the quality of funeral director services as a first step in the direction of a broader regulatory regime for funeral services in England, Wales and Northern Ireland. Please provide your comments to the CMA on this proposed prohibition.

In essence this is a positive step forward. There is such disparity between services and facilities offered. A grading system would be an option and would give greater clarity of the standards being provided. However it would be naïve to believe that any form of Government monitoring would not come without a significant cost attached and this will eventually be passed on to the fee paying client.

Q14

Please use the box below to provide the CMA with any other comments you have on the Provisional Decision Report and associated appendices.

Action is needed to address poor standards and facilities but this needs to be measured and proportionate.

#24

COMPLETE

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Page 1

Q1

What is the name of your business?

Hillier Funeral Service

Q2**England**In which of the UK nations does your business operate?
(tick all that apply)**Q3**

How many funeral homes do you operate?

3

Q4

In paragraph 16 of the Provisional Decision report, the CMA estimates that the consumer detriment (over-payment) arising from lack of effective competition between funeral directors is at least £400 per funeral, on average, across a significant proportion of the market (i.e. customers of both large and many small firms). Please provide your comments to the CMA on this estimation, in particular in the context of your own business.

Co-op, Dignity and other independent businesses in our area fail to put comprehensive prices on their website meaning that the consumer can't make a comparison. Yearly we call around all the local funeral directors to benchmark our prices and we generally find that Dignity and Coop are more expensive. Also some of the funeral directors omit certain items from their funeral packages such as chapel visits, collecting ashes, donation administration...etc. This will make them look cheaper online but when the customer engages with this funeral director these costs are then added on. At this stage the customer is unlikely to move and will just accept the extra costs. If all funeral directors have comprehensive pricing online then the customer can easily make an informed choice. It should also be noted that the funeral directors do offer a different quality of service and this can lead to differences in prices. In our area we are the only funeral director to offer a free bereavement care service and we have caretakers onsite for evening and weekend chapel visits.

Q5

In paragraph 9.160 the CMA proposes that all funeral firms with five or more branches should have to provide the CMA with the total number of funerals provided each quarter and the total revenue (excluding disbursements) per funeral during that quarter. For firms with more than ten branches this will need to be further broken down by funeral type. There is no specified end date to this requirement. Please provide your comments to the CMA on this proposed requirement.

n/a

Q6

If your funeral firm has more than five branches, will this quarterly monitoring requirement incur any costs on the part of your business? If yes or not sure, please explain to the CMA what you believe these costs will or may be comprised of.

Not sure,

Please provide more detail:

n/a

Q7

In paragraph 9.24 the CMA has provisionally decided to require all funeral directors to provide customers with information on the price of their: a) most commonly sold funeral package; b) standard funeral package (if different); and c) the simplest funeral package they offer. Please provide your comments to the CMA on this proposed requirement.

This is currently available on our website, we show the traditional funeral package, simple package and direct service. We also have clear price lists available in our premises. Generally a family knows the type of funeral service they want and generally they will want a traditional funeral. In this case its not appropriate to offer a direct or simple funeral as this doesn't meet the families requirements.

If money is an issue then we will always offer the simple funeral package to them but we will explain that this doesn't include chapel visits, us organising service sheets, flowers, paper notice, cars, cortege...etc.

Q8

In paragraph 9.28, the CMA has provisionally decided to require all funeral directors to provide customers with information on the price information of crematorium operators within a 30-minute cortege drive time from their business premises. Please provide your comments to the CMA on this proposed requirement.

We already provide this information but generally the family have already chosen the crematorium and in our area they are virtually the same cost.

Q9

In paragraph 9.27, the CMA has provisionally decided to require all funeral directors to provide customers with details of their terms of business, specifically: a) the size of upfront deposit required; b) when the deposit and final balance must be paid; c) any available payment options for paying the deposit balance; and d) any charges for late payment. Please provide your comments to the CMA on this proposed requirement.

We are part of the NAFD and SAIF so we already do this as standard practice. Every family goes away with a copy of the estimate and terms of business from the arrangement.

Q10

The CMA has provisionally decided to require funeral directors to make available to customers, both at their premises and online, clear and prominent information about any charitable or gratuitous payments made by the business (paragraphs 32-33). Please provide your comments to the CMA on this proposed requirement.

I'm not sure why this would be relevant information to a member of the public.

Q11

The CMA has provisionally decided to prohibit funeral directors from making payments to, or engaging in arrangements with, hospices, care homes and other similar institutions, which encourage or incentivise those institutions to refer customers to the funeral director (paragraph 34). Please provide your comments to the CMA on this proposed prohibition.

Totally agree with this.

Q12

Also in paragraph 34, the CMA has provisionally decided to prohibit funeral directors from soliciting for business through coroner and police contracts. Please provide your comments to the CMA on this proposed prohibition.

Totally agree with this. If a funeral director is acting on behalf of the coroner they shouldn't make it know which funeral director they are from.

Q13

In paragraph 9.21, the CMA has provisionally decided to recommend to the UK government and devolved administrations in Wales and Northern Ireland, that they should establish an inspection and registration regime to monitor the quality of funeral director services as a first step in the direction of a broader regulatory regime for funeral services in England, Wales and Northern Ireland. Please provide your comments to the CMA on this proposed prohibition.

I have no objections to this, we are regularly inspected by NAFD and SAIF. We have been told our facilities are the best in the area so a grading system would work well.

Q14

Respondent skipped this question

Please use the box below to provide the CMA with any other comments you have on the Provisional Decision Report and associated appendices.

#25

COMPLETE

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Page 1

Q1

What is the name of your business?

C. McGough & Sons LTD

Q2**England**In which of the UK nations does your business operate?
(tick all that apply)**Q3**

How many funeral homes do you operate?

350-400

Q4

In paragraph 16 of the Provisional Decision report, the CMA estimates that the consumer detriment (over-payment) arising from lack of effective competition between funeral directors is at least £400 per funeral, on average, across a significant proportion of the market (i.e. customers of both large and many small firms). Please provide your comments to the CMA on this estimation, in particular in the context of your own business.

As a family business established for approximately 100 years, we have been privileged to work in our community and offered a fair price for a quality service and as we continue to grow year on year I believe the competition of the 20+ funeral directors in our area keep prices and costs keen, every funeral is bespoke therefore comparison can be and very often is misleading, as an established company over 5 generations have invested heavily in the business

Q5**Respondent skipped this question**

In paragraph 9.160 the CMA proposes that all funeral firms with five or more branches should have to provide the CMA with the total number of funerals provided each quarter and the total revenue (excluding disbursements) per funeral during that quarter. For firms with more than ten branches this will need to be further broken down by funeral type. There is no specified end date to this requirement. Please provide your comments to the CMA on this proposed requirement.

Q6

Respondent skipped this question

If your funeral firm has more than five branches, will this quarterly monitoring requirement incur any costs on the part of your business? If yes or not sure, please explain to the CMA what you believe these costs will or may be comprised of.

Q7

In paragraph 9.24 the CMA has provisionally decided to require all funeral directors to provide customers with information on the price of their: a) most commonly sold funeral package; b) standard funeral package (if different); and c) the simplest funeral package they offer. Please provide your comments to the CMA on this proposed requirement.

The Code of practice we sign up to states that we should offer clear price lists and advise on what is available to the general public, then provide a clear written estimate, has that changed?

Each funeral is bespoke, I believe offering of the self funerals would lead to greater confusion and as in the prepaid sector open up to misguidance in some cases massively taking advantage of the vulnerable

Q8

In paragraph 9.28, the CMA has provisionally decided to require all funeral directors to provide customers with information on the price information of crematorium operators within a 30-minute cortege drive time from their business premises. Please provide your comments to the CMA on this proposed requirement.

Why wouldn't we do that? as well as advising which crematorium gives the best service in our opinion, as a city based company we have 3-4 crematoria we deal with

Q9

In paragraph 9.27, the CMA has provisionally decided to require all funeral directors to provide customers with details of their terms of business, specifically: a) the size of upfront deposit required; b) when the deposit and final balance must be paid; c) any available payment options for paying the deposit balance; and d) any charges for late payment. Please provide your comments to the CMA on this proposed requirement.

We already do that

Q10

The CMA has provisionally decided to require funeral directors to make available to customers, both at their premises and online, clear and prominent information about any charitable or gratuitous payments made by the business (paragraphs 32-33). Please provide your comments to the CMA on this proposed requirement.

Is this present in other sectors?

I do not believe donations should ever be allowed if the purpose is to gain favor or nomination of Funeral Director in such establishments as nursing homes etc... but if I wish to donate anonymously to my son's cancer ward why can't I?

Q11

The CMA has provisionally decided to prohibit funeral directors from making payments to, or engaging in arrangements with, hospices, care homes and other similar institutions, which encourage or incentivise those institutions to refer customers to the funeral director (paragraph 34). Please provide your comments to the CMA on this proposed prohibition.

Absolutely agree

Q12

Also in paragraph 34, the CMA has provisionally decided to prohibit funeral directors from soliciting for business through coroner and police contracts. Please provide your comments to the CMA on this proposed prohibition.

Absolutely Agree

Q13

In paragraph 9.21, the CMA has provisionally decided to recommend to the UK government and devolved administrations in Wales and Northern Ireland, that they should establish an inspection and registration regime to monitor the quality of funeral director services as a first step in the direction of a broader regulatory regime for funeral services in England, Wales and Northern Ireland. Please provide your comments to the CMA on this proposed prohibition.

I believe that some form of regulation would be good or even necessary, but I'm concerned that such regulation should be driven from within the industry as we know it better than anyone else and not a dictate from central government

Q14

Please use the box below to provide the CMA with any other comments you have on the Provisional Decision Report and associated appendices.

I am greatly concerned in fact astonished that a survey of 15 Funeral directors is all that this report is based upon !!
Family choice is paramount and over regulation I feel could diminish the choice available

#27

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Monday, September 21, 2020 4:38:18 PM
Last Modified: Wednesday, September 23, 2020 10:24:53 AM
Time Spent: Over a day
IP Address: 81.141.174.124

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Q1

What is the name of your business?

Williamson Brothers

Q2**England**In which of the UK nations does your business operate?
(tick all that apply)**Q3**

How many funeral homes do you operate?

One

Q4

In paragraph 16 of the Provisional Decision report, the CMA estimates that the consumer detriment (over-payment) arising from lack of effective competition between funeral directors is at least £400 per funeral, on average, across a significant proportion of the market (i.e. customers of both large and many small firms). Please provide your comments to the CMA on this estimation, in particular in the context of your own business.

In our experience seems a massive underestimation when compared to larger national groups. For instance a funeral we provided was quoted to a family by a dignity branch at around £2k above our cost.

Q5

In paragraph 9.160 the CMA proposes that all funeral firms with five or more branches should have to provide the CMA with the total number of funerals provided each quarter and the total revenue (excluding disbursements) per funeral during that quarter. For firms with more than ten branches this will need to be further broken down by funeral type. There is no specified end date to this requirement. Please provide your comments to the CMA on this proposed requirement.

As we only have one branch this would have a minimal impact on us. Our only comment would be funerals are personal and therefore we would find it hard to categorise them into different "types".

Q6

If your funeral firm has more than five branches, will this quarterly monitoring requirement incur any costs on the part of your business? If yes or not sure, please explain to the CMA what you believe these costs will or may be comprised of.

Not sure,

Please provide more detail:

N/A

Q7

In paragraph 9.24 the CMA has provisionally decided to require all funeral directors to provide customers with information on the price of their: a) most commonly sold funeral package; b) standard funeral package (if different); and c) the simplest funeral package they offer. Please provide your comments to the CMA on this proposed requirement.

We do not offer package funerals as we will only provide what is required by the family, so that they don't have to have and pay for things they don't wish for or need. In the nature of treating every family and deceased as an individual all of our funerals are bespoke to reflect their wishes.

Q8

In paragraph 9.28, the CMA has provisionally decided to require all funeral directors to provide customers with information on the price information of crematorium operators within a 30-minute cortege drive time from their business premises. Please provide your comments to the CMA on this proposed requirement.

We do this with every arrangement currently and so endorse this recommendation.

Q9

In paragraph 9.27, the CMA has provisionally decided to require all funeral directors to provide customers with details of their terms of business, specifically: a) the size of upfront deposit required; b) when the deposit and final balance must be paid; c) any available payment options for paying the deposit balance; and d) any charges for late payment. Please provide your comments to the CMA on this proposed requirement.

We do this with every arrangement currently and so endorse this recommendation.

Q10

The CMA has provisionally decided to require funeral directors to make available to customers, both at their premises and online, clear and prominent information about any charitable or gratuitous payments made by the business (paragraphs 32-33). Please provide your comments to the CMA on this proposed requirement.

Yes this would be good practice

Q11

The CMA has provisionally decided to prohibit funeral directors from making payments to, or engaging in arrangements with, hospices, care homes and other similar institutions, which encourage or incentivise those institutions to refer customers to the funeral director (paragraph 34). Please provide your comments to the CMA on this proposed prohibition.

We believe that a firm should be judged on the merit of their work and their price competitiveness. However, nursing homes will always make a recommendation without there being any financial incentive.

Q12

Also in paragraph 34, the CMA has provisionally decided to prohibit funeral directors from soliciting for business through coroner and police contracts. Please provide your comments to the CMA on this proposed prohibition.

Yes we agree with this, the funeral director in this capacity should only represent the coroner or police as contracted to.

Q13

In paragraph 9.21, the CMA has provisionally decided to recommend to the UK government and devolved administrations in Wales and Northern Ireland, that they should establish an inspection and registration regime to monitor the quality of funeral director services as a first step in the direction of a broader regulatory regime for funeral services in England, Wales and Northern Ireland. Please provide your comments to the CMA on this proposed prohibition.

Yes we support this and feel. It would be welcomed to most funeral directors who are established in the correct manor and a way to display to families that the back of house facilities and care provided is of a high standard, as this is not an area a bereaved family can have an interaction with.

Q14

Please use the box below to provide the CMA with any other comments you have on the Provisional Decision Report and associated appendices.

We do feel that before any controls are put in place the CMA should attend more funeral homes, including small independents as we do not feel currently the true breadth of the industry is reflected within the report. In addition we also feel any regulatory body should be constructed in consultation with Funeral Directors so that it is fit for purpose, as often people from outside the industry often do not grasp how our industry works or the challenges we face.

#28

COMPLETE

Collector: Web Link 1 (Web Link)
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Last Modified: Tuesday, September 29, 2020 4:54:22 PM
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Page 1

Q1

What is the name of your business?

Crake and Mallon Funeral Service

Q2**England**In which of the UK nations does your business operate?
(tick all that apply)**Q3**

How many funeral homes do you operate?

One

Q4

In paragraph 16 of the Provisional Decision report, the CMA estimates that the consumer detriment (over-payment) arising from lack of effective competition between funeral directors is at least £400 per funeral, on average, across a significant proportion of the market (i.e. customers of both large and many small firms). Please provide your comments to the CMA on this estimation, in particular in the context of your own business.

I think that on line pricing and greater transparency would ensure that people are able to make informed choices about the funeral director they use. We shouldn't assume that all those who are appointing a funeral director are basing their decision on cost alone, there will be other factors. Online pricing, transparency about the services being offered will help tremendously, but this approach flounders in the absence of active encouragement for people to consider what their wishes are and make sure that their family and/or next of kin are aware.

Q5

In paragraph 9.160 the CMA proposes that all funeral firms with five or more branches should have to provide the CMA with the total number of funerals provided each quarter and the total revenue (excluding disbursements) per funeral during that quarter. For firms with more than ten branches this will need to be further broken down by funeral type. There is no specified end date to this requirement. Please provide your comments to the CMA on this proposed requirement.

I would like to understand more about the reason behind this data gathering proposition. I don't know how family choice and family wishes would fit in to that? For example, in a period of one month this year we arranged two high cost funerals in our community. For cultural reasons, these types of funeral have always been high value, as part of their culture, family choice and tradition. This would mean that a "snapshot" of the figures for that period would see an increase in the average revenue per funeral. The CMA is saying it is to identify harmful behaviour - I wasn't sure what they meant by that.

Q6

If your funeral firm has more than five branches, will this quarterly monitoring requirement incur any costs on the part of your business? If yes or not sure, please explain to the CMA what you believe these costs will or may be comprised of.

No,

Please provide more detail:

I don't have more than 5 branches

Q7

In paragraph 9.24 the CMA has provisionally decided to require all funeral directors to provide customers with information on the price of their: a) most commonly sold funeral package; b) standard funeral package (if different); and c) the simplest funeral package they offer. Please provide your comments to the CMA on this proposed requirement.

I don't have a problem with prices on line and transparency about the services being offered. This used to be done through our NAFD membership (many years ago) when there was a "maximum price for a minimum funeral".

Q8

In paragraph 9.28, the CMA has provisionally decided to require all funeral directors to provide customers with information on the price information of crematorium operators within a 30-minute cortege drive time from their business premises. Please provide your comments to the CMA on this proposed requirement.

I think this is helpful, however I think that the CMA should require crematorium operators to make their price lists easy to understand. There are some in this area that run to pages and pages with all the components of a cremation listed separately. This is confusing (not just for the consumer but for us too!). There should be a standardised format for this and we should be able to put links to the crematorium website and pricing on our own websites.

Q9

In paragraph 9.27, the CMA has provisionally decided to require all funeral directors to provide customers with details of their terms of business, specifically: a) the size of upfront deposit required; b) when the deposit and final balance must be paid; c) any available payment options for paying the deposit balance; and d) any charges for late payment. Please provide your comments to the CMA on this proposed requirement.

This is an excellent idea - price transparency and prices on line are meaningless without a clear understanding of payment terms and conditions. Payment terms should be clearly noted on funeral director's websites.

Q10

The CMA has provisionally decided to require funeral directors to make available to customers, both at their premises and online, clear and prominent information about any charitable or gratuitous payments made by the business (paragraphs 32-33). Please provide your comments to the CMA on this proposed requirement.

I don't have an issue with this but there needs to be some context around it.

Q11

The CMA has provisionally decided to prohibit funeral directors from making payments to, or engaging in arrangements with, hospices, care homes and other similar institutions, which encourage or incentivise those institutions to refer customers to the funeral director (paragraph 34). Please provide your comments to the CMA on this proposed prohibition.

For me personally this could be difficult as I am regularly asked to present to groups such as hospices, hospitals etc. This is often done as part of induction training for new staff (in a hospice for example) or as part of familiarisation of the work of the funeral profession for nursing homes and critical care teams at hospitals. I am not sure how this would fit with the CMA's decision? By describing the work of my team, would it be viewed that I am encouraging people to refer families to us? I understand and agree with the part about payments (I don't receive a fee for presenting). In one scenario we (the funeral profession) are being asked to be transparent about what we do ... but then we are told we will be prohibited from engaging with hospices etc. I am struggling with that. Also, I regularly present on behalf of the NAFD to things such as Local Resilience Forums - would that be prohibited too?

Q12

Also in paragraph 34, the CMA has provisionally decided to prohibit funeral directors from soliciting for business through coroner and police contracts. Please provide your comments to the CMA on this proposed prohibition.

I agree with this. I have known of funeral firms who have submitted a zero value tender for the coroner's contract. Why would you do this? The coroner should issue a contract for funeral directors, where each funeral director receives the same fee (here it is £100) and the police should ascertain the family's choice at the time of need. If there are no family present, the call should go to the "next on list" funeral firm.

Q13

In paragraph 9.21, the CMA has provisionally decided to recommend to the UK government and devolved administrations in Wales and Northern Ireland, that they should establish an inspection and registration regime to monitor the quality of funeral director services as a first step in the direction of a broader regulatory regime for funeral services in England, Wales and Northern Ireland. Please provide your comments to the CMA on this proposed prohibition.

I agree with an inspection and registration regime

Q14

Please use the box below to provide the CMA with any other comments you have on the Provisional Decision Report and associated appendices.

Whilst I welcome the requirement for pricing on line and transparency around terms and conditions for payment and payment options, together with inspections of facilities, I think that this needs to be done in conjunction with a campaign which actively encourages people to think about end of life planning and their funeral wishes.
