

Hello - here is our response to the consultation questions raised in your April 2021 documentation:

Our understanding is that comments have been requested for the pricelist as set out in the attached image:

STANDARDISED PRICE LIST

All funeral directors are legally required to publish this Price List for a standardised set of products and services, to help you think through your options and make choices, and to let you compare prices between different funeral directors.

ATTENDED FUNERAL (funeral director's charges only)	£xxxx
This is a funeral where family and friends have a ceremony, event or service for the deceased person at the same time as their burial or cremation.	
Taking care of all necessary legal and administrative arrangements	£xxx
Collecting and transporting the deceased person from the place of death (normally within 15 miles of the funeral director's branch premises) into the funeral director's care	£xxx
Care of the deceased person before the funeral in appropriate facilities. The deceased person will be kept at [both] the funeral director's branch premises [and other premises]	£xxx
Providing a coffin suitable for burial or cremation – this will be made from [insert description of the coffin]	£xxx
Viewing of the deceased person for family and friends, by appointment with the funeral director (optional service)	£xxx
At a date and time you agree with the funeral director, taking the deceased person direct to your choice of cemetery or crematorium (which can be up to 20 miles from the funeral director's branch premises) in a hearse or other appropriate vehicle – this will be using [insert description of vehicle style and make]	£xxx
UNATTENDED FUNERAL (if offered)	
This is a funeral where family and friends choose to have a ceremony, event or service for the deceased person at a later date and not at the same time as their burial or cremation.	
Burial (funeral director's charges only)	£xxxx
Cremation (funeral director's charges plus cremation fee)	£xxxx
FEES YOU MUST PAY	
For an Attended or Unattended burial Funeral, the burial fee . ¹	£xxxx
In this local area, the typical cost of the burial fee is:	to
For a new grave, you will also need to buy the plot; for an existing grave with a memorial in place, you will also need to pay a removal/replacement fee. In addition, the cemetery may charge a number of other fees.	£xxxx
For an Attended cremation Funeral, the cremation fee . ²	£xxxx
In this local area, the typical cost of a cremation is:	to
	£xxxx
ADDITIONAL FUNERAL DIRECTOR PRODUCTS AND SERVICES	
This funeral director can supply a range of optional, additional products and services, or they can arrange (on your behalf) for a third party to supply them. These include:	
Out-of-hours collection of the deceased's body	£xx
Additional transfers of the deceased's body (e.g. to their home)	£xx
Additional viewing(s)/out-of-hours viewing(s)	£xx
Specific religious or cultural requirements	Price on request
Funeral officiant (minister, celebrant etc.)	£xx
Pallbearers	£xx
The funeral director can give you a full list of what they can supply. They are likely to charge for these additional products and services, so you may choose to take care of some arrangements without their involvement, or you can use a different supplier.	

Is the Standardised Price List (see Part A to Schedule 1 of the draft Order) appropriately presented?

Presentation and description cannot be separated therefore our comments pertaining to this question are mainly in the answers to question 2 below.

Does the Standardised Price List appropriately describe the items that are included under the Attended Funeral?

We would recommend that it should be made clear that the 'Attended Funeral' is a 'simple funeral' and describes 'funeral services that provide the minimum that is needed to carry out a funeral' We would recommend that the sentence relating to unattended funeral is turned round, and so should read:

"This is a funeral where family and friends do not attend the actual burial or cremation, but choose to have a ceremony, event or service for the deceased person at a later date." - we believe this makes the distinction between the two more immediately apparent.

Do you agree with the items that are included under the Attended Funeral and Unattended Funeral (see Part B and Part C to Schedule 1 of the draft Order)?

We would recommend that 'viewing' is not included in the attended funeral price as not everyone wishes to do this and therefore people should not be charged for something they do not use. It should be an 'optional extra'

Dr Certificates for cremation appear to have been added only as a footnote - we do not believe this is clear enough it should be listed separately.

Funeral Directors must maintain a register of any material charitable donations, contributions or payment of gratuities. Material has been defined as any individual or cumulative donation, contribution or payment within any 12-month period of £250 or more (see Article 7 of the draft Order and paragraph 71 of the draft Explanatory Note). Is £250 an appropriate de minimis figure?

Yes

Crematorium Operators must provide price information to local funeral directors and customers on a Crematorium Standard Fee Attended Service; a Crematorium Unattended Service if offered by the Crematorium Operator; and a Crematorium Reduced Fee Attended Service if offered by the Crematorium Operator (see Article 8(5) of the draft Order). Do these names appropriately identify the three services?

Yes - along as the third option is clearly defined at that point.

Articles 9 and 10 of the Order require Funeral Directors with five or more branches and ten or more branches to provide certain information to the CMA. Schedule B and Schedule C to the Explanatory Note list funeral directors with five or more branches and ten or more branches respectively. Please inform us if you consider your own or another Funeral Director business is erroneously included or excluded from the lists in these schedules.

If a party is aware that it is not compliant with any part of the Order, it must report this non-compliance to the CMA within 14 days of becoming aware that it is not compliant (see Article 11(6) of the draft Order). Is 14 days sufficient time for parties to report non-compliance to the CMA? If not, please give reasons.

No particular comment

8. The substantive requirements of the Order will come into force three months after

the Order is made. Does this allow sufficient time for parties to make the necessary changes to their systems and processes so that they are in a position to comply with the requirements of the Order? If not, please give reasons.

No particular comment

We also wish to provide some comment to other elements of the order such as defining what is reasonable in terms of how information should be presented to customers within their outlet. We do not believe that sizes of posters such as A3 or A2 should be prescribed to businesses - we have spent a great deal of time creating an environment that feels nice and homely and comfortable to the grieving people who come to our premises. We do not believe that people in this situation would wish to stand at an A2 poster trying to take in the information that is presented there, nor does it add to the type of comfortable and sensitive environment we are creating. We have always had leaflets (including price lists available in a leaflet dispenser at our door which we regularly have to fill up) and also in dispensers around the seating area in our premises. These items are clearly visible and clearly there for people to pick up. We would much rather encourage a grieving person to either take it away and absorb in their own time, in their own environment, or read it sitting down with a cup of tea, than making them stand up and read an A2 poster. We have always made our pricing accessible, on or offline to our customers and the ease with which people can access and understand our pricing is much commented upon by our customers.

Your faithfully

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A Natural Undertaking

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