

Dear Sirs,

Thank you for the investigation that is taking place into our industry. I respond as an independent Funeral Director of a business with 6 branches.

- 1. Is the Standardised Price List (see Part A to Schedule 1 of the draft Order) appropriately presented?**
- 2. Does the Standardised Price List appropriately describe the items that are included under the Attended Funeral?**
- 3. 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)?**

Partially

Distance -15 miles is too few miles. Most FDs are prepared to include collection from a local hospital. This is even more exclusive for rural companies. - Suggestion is 25 miles or even 30.

Viewing - whilst we do not, many firms insist that embalming must take place before viewing and this is at an additional cost. It needs to say whether embalming will be charged for if viewing is chosen. It says optional service - I do not feel that explanation is very clear to people. It also needs to state whether in or out of hours and weekdays.

Unattended - it is unfair to have to include the price of the cremation in this fee as it varies widely, even in local areas. Could the cremation fee be listed separately (as for burial) AND the doctor's fee made mention of as there is no reference to this. If it is not to be included, people need to be aware that there may be one. It is NOT clear enough that the unattended Service is a 'no service' option. Whilst it says that in the title, the description needs to make it clear that no-one can attend, including no minister being present (which is very important to some people and not always understood).

Fees

Burial fee - this will vary greatly and needs to be broken down into a purchase fee, an interment fee and a gravedigger's fee. There is no mention of an interment fee, only the purchase and no gravedigger. All three are often charged separately, churchyards do not and cemeteries often do not engage a gravedigger and therefore that fee is extra.

There is no mention of an unattended burial.

It is confusing to have attended and non-attended on the same line

Reference to the fee for a Medical Referee could be confused with the MR at the Crematorium

Additional Products - not enough included.

It needs to be clearer that this is for a simple type of funeral **and that** that if anything in addition is required that there will be extra charges, ie for a Service before the committal;

Services relating to Ashes (interment etc.) are not included

I think it is very important to have to list what is NOT included

Some hide extra charges such as dealing with donations, placing an online tribute, recording names, collection of Ashes from the Crematorium etc.

I also feel that it is very important what proportion needs to be paid in advance. A FD who takes payment upfront for all or part has a much lower risk of debt and that may reduce the price they charge as opposed to one who does not take money in advance

4. 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 this is an appropriate figure but is that a one off - what would be the situation of making more than one £250 donation to the same charity or in a different manner?

5. 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 so long as they clearly state what is and isn't included - such as admin fees when they sell direct to the public and following exactly the same format as the FD pricelist

6. 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.

I do not have any additions / deletions

7. 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.

Yes I feel it is

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.

Yes - we have all been aware and kept informed

Additional notes

Please can you ensure that the correct spelling of interment - without a n in the middle, is used.

Prices online

I am a great believer in transparency and our prices have been on our website for many years.

However, price comparison is only good when it is up to date. There are existing sites where FDs' prices are years out of date (see localfuneral.co.uk as well as others), hundreds of pounds different to what is on their website

etc. This is unfair to those who do keep theirs up to date but then look more expensive. A quick look in my local area shows one who is £350 less on a comparison site than currently on his website and disbursements are two years out of date. There needs to be a mechanism whereby this cannot happen and a penalty for non-compliance

Names of funerals

Please, please do not use such emotive terms as respectable or decent . People make their own choices for many reasons and they should not be made to feel that what they have chosen is less decent or respectable than something higher priced. They may be unable to afford anything else but would be made to feel that they should have chosen better.

Many thanks,

Karen Hussey

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