

Draft CMA Order
April 2021
Response by A. W. Lymn The Family Funeral Service

As the CMA are aware we were invited to comment on several point of the draft order at an informal pre-consultation phase back in February. We are somewhat disappointed in that the CMA has declined to provide us with a tracked document showing any changes made to the draft order and explanatory notes as a result of that process.

I would therefore request that when publishing this response you all include the following documentation as appendices:

1. A W Lymn Response to the Draft Order – dated 24th February 2021
2. E-mail from the CMA – dated 3rd February 2021
3. The Draft Order – dated February 2021
4. The Explanatory Note – accompanying the above.

Part 2 – Funeral Directors price, commercial information and transparency

This continues to focus completely on price without any reference to quality. The CMA fails to acknowledge that most bereaved families look at the quality and standard of services provided and make their decision on the basis of this rather than on price alone.

We fail to understand why you are forbidding the inclusion of the word “CMA” when describing the “Attended funerals” and “Unattended funerals”. In our own case we offer a range of unattended funerals and for potential clients to compare like for like between different firms it would be more apparent that they were comparing the prices of a similar service if the word CMA was included.

We equally feel the obligation to include the Crematorium fee in the total unattended package price will cause confusion. The funeral director will presumably select the cheapest local crematorium to bring the overall price down, but this crematorium may offer limited facilities in comparison to another or shorter service times.

We also have a difficulty in that some of our crematorium operators have a resident and a non-residents fee and the clients using those offices fall both in and out of area so to give one price would be misleading. Further come crematoria that we use do not include the dispersal of cremated remains within their standard fee therefore a client would always have additional charges to pay for either leaving the cremated remains at the crematorium for scattering or for us to collect to administer elsewhere.

The explanatory note makes reference to two types of services, being those that must be included on the additional options price list and those that do not. We fail to understand the difference between an “other” product or service which needs to be included in this list and a “bespoke” product or service which does not?

We currently have a 90 page full colour priced services brochure which is available for download on the homepage of our website, is available in all our offices and furthermore is handed to all clients at the first available opportunity, be that at the time of collection of

deceased or the first meeting with the bereaved. Given this includes all additional services that we offer we assume this will suffice as the additional options price list but please clarify.

We would argue that the attended package should only include the necessary services and that all other services should be charged for additionally as and when they are required. To have a package that includes the provision of bearers and viewing facilities, which are regularly not required, will only mislead. It would be much better to exclude those services but to show them as additional options to be selected as and when required.

The draft order lacks clarity about the details and rules regarding display of information. The following questions appear to be unanswered by the guidance:

1. Is a separate A2 poster required for both attended and unattended funerals?
2. Does the same poster have to include the terms of business? If so how should funeral directors deal with a situation whereby different terms apply to different packages? Also, in the case of A W Lymn, there is not normally any requirement to pay disbursements upfront, but in the case of burial fees for the City of Nottingham and Gedling Borough Council, payment is required by the client direct to the authority at the time of booking as they do not extend any credit to the funeral director.
3. Our terms and conditions currently run to two close typed A4 pages. To display this on an A2 poster would use half of it. Is this required?
4. What is defined as the ultimate ownership of a business and how much detail of this is to be displayed on the poster?
5. Who is empowered to decide if there is insufficient space available to display an A2 poster within a branch? Is it acceptable to say there is insufficient room because there are already photographs and picture in position on the walls?

The explanatory notes state that a gratuity payment made by made to a third party and in particular specifically mentions mortuary attendants. However part 3 specifically prohibits payments being made to hospitals. Surely these two activities contradict one another?

Part – 3 Prohibited Practices

The explanatory notes state that funeral directors will be prohibited from producing a booklet for bereavement services for a number of institutions however this does not list Doctors surgeries or Registrar, is it the CMA's intention that these are included within this category? More commonly such booklets are produced by third party printers who sell either advertising space or offer exclusive exposure to one funeral director. These documents are then handed out to the recently bereaved. Will these also be prohibited?

We are aware of a number contractual arrangements between funeral directors and hospital trusts and local authorities to provide funeral services where these third parties are legally responsible to provide such services. Many of these third parties also hand to bereaved families and friends documents relating to the services provided by the contracted funeral director together with documents from the contracted funeral director offering optional additional

services to those families. The draft order does not make clear whether or not such documents would be prohibited.

Schedule 1 – Standardised Price List

The price list is very difficult to understand. Given that it confusing my colleagues and I who have over 100 years' experience in funeral service there can be little doubt that in it's present format it will confuse the public this is it supposed to serve.

Attended funerals

- A. Does the first line in **bold** include the six items listed below?
- B. The explanatory notes states that a Funeral Director does not have to offer each of the items included in the attended funeral as a separate produce or service, but may choose to do so. If the funeral director chooses not to offer these separately do they still need to show these six services itemised on their price list. If so what is the point?
- C. The explanatory notes states that a funeral director may elect to allow a client to remove some of the elements of the attended funeral and can choose whether or not to allow a discount for this. It states that the customer must be confirmed of this but there is no requirement to state those conditions on the price list. This lack of information would make it impossible for potential clients to make a like for like comparison simply from the price lists.
- D. As we understand it if a funeral firm decides to make no reduction for items not provided a client could choose to purchase a coffin from a third party but would still have to pay the contracted funeral director for the simple coffin that would otherwise have been provided in the package.
- E. Reference is made to care of the deceased and the option is available to insert a price. There is however no option to state the number of days included within the package. This most certainly needs to be limited. We can sight examples of families choosing to wait many months for a funeral and clearly storage facilities for such extended periods would not be included within the standard price.
- F. We have already made comment on the inclusion of viewing in this package above.

Unattended funerals

- G. We fail to understand why unattended funerals in the form of cremation are to be treated differently in terms of pricing to attended funerals and unattended funerals with a burial, both of which include no disbursement elements. Why then include the cremation fee for an unattended cremation?

We give clients several choices of the level of service and in particular the crematorium to be used for an unattended cremation. Where clients say simply choose the cheapest we arrange for a cremation at the crematorium with the lowest cremation fee, which happens to be outside of our normal trading area, and we charge a higher price for our services to cover the additional mileage. However if a client specifically requests a

local crematorium the fee for our service is less but with the higher cremation fee the overall total charge is more. In our experience many clients still choose cremation at the local crematorium even though this adds additional cost.

- H. The other major misleading factor in this section is the complete omission of any reference to Doctors fees. Pre-pandemic these were £164.00 (during the pandemic £82.00) plus travelling expenses, and when HM Coroner is not involved these charges are unavoidable. A potential client looking at the unattended funeral, if selecting a cremation, would be surprised to find these Doctors fees representing an additional charge not shown on your standardised price list.
- I. Finally, the wording “*Cremation (funeral director’s charges plus cremation fee)*” is misleading and if the intention is to still include the cremation fee this should state “*Cremation (including funeral director’s charges and cremation fee)*”

Fees you must pay

- J. Reference is made by the suffix ² to the Doctor’s fees which may be payable in England, Wales and Northern Ireland for an attended cremation. This is incorrect as this fee may be applicable to all cremations, not just those that are attended, a not should therefore be made on the unattended cremation as well.

The wording of suffix ² states “*You may also need to pay a Medical Referee (Doctor’s) Fee*” Under current legislation a Medical Referee’s fee is always payable but this is usually included in the fee charged by the crematorium. This however is not the same as the Doctor’s fees which are in addition to the Medical Referee’s fee and are explained in H above.

Additional Funeral Directors Products and Services

- K. Must all the items shown in this section of the draft price list be included by all funeral directors or is it at the funeral directors discretion as to which charges they may wish to include here? Our details of additional charges are shown in a 90 page full colour services brochure.
- L. In most cases we do not charge extra for out of hours collection of the deceased, but how do we differential on a simple price list when such charges would be applicable.
- M. In this section you leave space for the funeral officiant fee but in our experience, although the Church of England set the fee for its Ministers on a annual basis, the fees charged by other Ministers and Celebrants vary widely and even within the Church of England there are mileage charges and travelling expenses which vary from Minister to Minister. As such we do not understand how we could provide a single figure.

Schedule 2 – Information required by the CMA

We would refer back to p7 of our submission of 24th February. We still fail to understand what the relevance of number of branches is rather than turnover or number of funerals. We also fail to understand at what point a CMA attended or unattended funeral becomes an other funeral and ceases to be classified as a CMA funeral given that in our experience with the provision of

package funerals such as pre-paid funerals, the majority of families choose to make alterations from the original packages.

In our previous submission we also made reference to different types of funerals such as Child funerals, Environmental Health Funerals, Social Services Funerals, etc. and asked if these would require including in our reporting but no clarity has been including in this regard.

As ever please feel free to contact me should you wish to discuss anything further in relation to my response.

Thank you.

Nigel Lymn Rose

BSc (Hons), MBIE, Dip.FD, MBIFD

Company Chairman and fourth generation



17th May 2021

Page 5 of 5

FUNERAL MARKET INVESTIGATION
Draft CMA Order – February 2021

A. W. Lymn The Family Funeral Service - Responses in red

Further to your e-mail of 3rd February please find below my response, initially to the questions you have specifically asked and then more generally to the draft regulations document.

- A. Price information for customers (Article 3 of the Order) – we are proposing Funeral Directors provide the Standard Price List, using the terms and format set out in Part A of Schedule 1 of the Order. This includes the provision of certain details (see items 3, 4, 5 and 7 of the Standard Price List). If you do not agree with the inclusion of these details please explain why and how you think these could be improved.

Para 17 – we agree with the ethos that people should have more price transparency, we do not however accept that article 3 will make it less likely that customers are surprised by the final cost by a number of reasons;

- a. The price charged by each crematorium would be given as a price from, in reality this would be for a non-core time and the final price for the time chosen would likely exceed this.
- b. In many trading areas HM Coroner (HMC) now takes several days if not weeks to decide whether they want any involvement. If it is suspected that they do then the family will be advised that due to this there will be no Doctors fee. This could also impact storage costs charged by the funeral director due to extended delays between death and funeral whilst this decision is being made.

The standard price list

I am deeply concerned that the standard price lists will only serve to confuse the public particularly as you have asked for disbursement figures to be included as these vary widely and need an individual explanation on each occasion as to which fees would apply.

Given that the disbursements should remain the same when seeking quotations from all competing funeral directors within any geographical area surely it would be more helpful to clients to just compare the funeral directors costs and by definition the funeral director with the cheapest price for their services will also be the funeral director with the cheapest price for all services including disbursements. The advantage of this would be that on contacting the cheapest funeral director the family would be given accurate third party costs and so would know the actual overall price and whether or not they could afford this or whether they needed to make alternative decisions.

I have made specific comments further on but I do not see the funeral as defined in the draft documents to be representative of what families require. They make no allowance for diversity and do not adequately describe the funerals of any other than a traditional British Christian funeral. The definitions are too limited and the defined funeral would not meet the requirements of most ethnic groups such as Muslims, Sikhs, Jews, Hindus, African Caribbeans, Italians, Polish, to name but a few.

CMA ATTENDED FUNERAL (funeral director's charges only)

A fundamental consideration here must be the age of the deceased. Funeral Directors, cemeteries and crematoria all use differing ages for their cut off policies between children and adult funerals.

1. Attending to the necessary arrangements

Does this include the following or are these chargeable as extras:

- Out of hours attendance by a Funeral Director
- Attendance at the home address by a Funeral Director to arrange
- Attendance by Funeral Director at a distant address
- Additional visits and / or time to discuss matters which the family could not decide upon in the first visit.

2. Provision of the necessary staff for care of the deceased

Does this include the following or are these chargeable as extras:

- Attendance of staff to deal with preparation out of hours such as ritual washing.
- First officers (this is the same as last officers if done by the nursing profession)
- Dressing the deceased in a gown
- Dressing the deceased in own clothes – this generally cannot be done by one person. (If the above are included then does an allowance have to be made if a body is released in a bag and preparation is specifically excluded?)

I note there is no provision anywhere in the standard price list for a gown

3. Provision of an appropriate coffin suitable for burial or cremation – this will be made from [*insert description of coffin, e.g. wood veneer*]

Does this mean a coffin with a wood veneer, or does it mean a wooden coffin with a veneer?

Does this include the following or are these chargeable as extras:

- Any interior
- The necessary handles
- An engraved name plate
- Any sealing to prevent leakage as you are now suggesting that embalming is not included as standard

4. Transportation of the deceased person from the place of death (normally within 15 miles but taking into account local circumstances) – this will be using a [*insert description of vehicle*]

Does this include the following or are these chargeable as extras:

- Collection outside of normal working hours
- Additional staff that may be required due to the size or location of the deceased

- Additional PPE, disaster kits and cadaver bags when necessary due to decomposition of the body.
- Two transfers which are often necessary (to clarify; the deceased is moved from the place of death to the Funeral Directors premises, this is clearly chargeable to the family. HMC then becomes involved and the deceased is moved by the contractor from the FD premises to HMC's mortuary. This cost is covered by HMC. The deceased then needs moving back to the FD being a second transfer which is not included in the coroners price and is therefore covered by the family).

5. Appropriate arrangements for the uplift of the deceased and care of the deceased person prior to the funeral in appropriate facilities – they will be kept [at our branch premises* / at these premises* (*insert address*)] and [will* / will not*] be kept in refrigeration until the time of the funeral **delete as applicable*

The uplift of the deceased is covered in my comments on 4 above.

It is impossible to state on a price list where the deceased would be kept and whether in refrigeration or not. The recent pandemic has highlighted the fact that there is insufficient cold room storage for everyone at such times and in our own case we use spare capacity at some branches to assist other branches when they are busy. As such we cannot specify on a standard price list how that will work. We also use the facilities of specialist qualified staff to prepare the deceased for viewing and for these staff to work efficiently and safely in the appropriate environments, which in our case are now HTA licenced, the deceased are move to these specialist facilities or hubs.

At the time of death and original transfer we discuss with the family where the deceased is to be moved. Ideally we would move straight to the hubs to enable the preparation to take place and the deceased would then go back to the agreed branch in a coffin, however with the delays on paperwork, not knowing whether the body will be transferred to the hospital for HMC and in circumstances other than a pandemic the Doctor, who no longer offers a 24 hours service, needing to see the deceased, they are kept at our local branch. All of which have cold room facilities. I repeat however that if one is full then we used the facilities of another and inform our clients.

Keeping deceased in refrigeration until the time of the funeral should be discouraged when families are viewing as by moving a deceased from a fridge environment to normal ambient temperature condensation appears on the skin and the body is cold to touch giving the families a most unpleasant experience on viewing.

Finally, what period is included within this, is it five days, seven days, 10 days? Without a set period there is no price comparison.

6. Viewing of the deceased person, during normal working hours, by appointment

Does this include the following or are these chargeable as extras:

- Preparation of the deceased for viewing, or is it acceptable to simply show the family the body in the condition in which it was released to the funeral director.

- Is this to be in a chapel of rest or as implied by the suggestion earlier that the body is kept refrigerated until the time of the funeral, is this in a mortuary style environment.
- More than one visit to the chapel
- Unlimited time on the visit
- A room with only one deceased
- Preparation of the body cannot take place until all the paperwork is complete, and this period is generally unknown and therefore simply stating that viewing can be during normal working hours by appointment would be extremely misleading.

This also fails to say where the viewing will be. I know of funeral directors with no viewing facilities who tell families to view at the hospital or make arrangements to borrow a cemetery chapel.

7. Provision of a hearse or other appropriate vehicle direct to the nearest crematorium or cemetery at a date and time agreed with the funeral director and clearly described to the client – this will be using a [*insert description of vehicle*]

This is nonsensical. In our own case we have one funeral home located within a cemetery which only has a few reopen graves now available. We could include the price for the hearse for just this situation and charge extra for all our other funerals at a different place of committal. Surely the suggestion of a timeframe or mileage would be more appropriate? For example, up to two hours and 20 running miles from leaving the funeral directors premises to return.

8. The opportunity to hold a service at the cemetery or crematorium at the time of committal

This gives no detail of the service that could actually be provided. This funeral director may decide to only include the service of committal, and in the case of a burial this could be simply at the graveside. For a burial service in the cemetery chapel or a burial or cremation service at a separate venue presumably additional charges could be made both in terms of staff and vehicle time and vehicle mileage.

CMA UNATTENDED FUNERAL (if offered, funeral director's charges only)

I note that this refers to a funeral suitable for burial or cremation but there is only an opportunity to provide one price. Clearly if it is to be a burial more staff will be required to confirm to the health and safety aspects of placing a coffin in a grave than wheeling a coffin into a crematorium. Therefore two prices need to be given and further a weight limit needs to be provided over which additional charges can be made for the additional staff required to confirm to health and safety.

FEES

Doctors fee (cremation only)

It needs to be remembered that Doctors fees do not always apply in the case of cremation as if HMC is involved a form 6 will be issued for which there is no charge.

Further during the pandemic only one Doctor's certificate has been required for cremation and only one fee has been payable. It must however be remembered that this fee is a fee recommended by the BMA but the amount actually payable is determined by the Doctor contracting with the Funeral Director to complete the forms 4&5, but a different Doctor cannot be selected if the price quoted is higher than that recommended as the Doctor who completes Form 4 is determined by statute and must be paid whatever he demands. Also travelling expenses are recommended in addition to the fee for completing the medical certificate.

Cremation fee (cremation only)

In our trading area the cremation fee for adults varies between £350.00 and £1,035.00 and each crematorium includes different aspects of the cremation within its fees. To give these prices on a price list would be extremely misleading.

Burial fees (burial only)

What is meant by this? Some cemeteries include the grave digger, some do not. Some charge in area and out of areas, some charge a standard fee. Some families will be using a new grave and need to purchase the rights to the grave, other families will be re-opening a grave. Some graves will have a memorial on which needs removing and refixing to permit the interment.

I have written to the CMA about this on several occasions and the cemeteries fees in our area in 2020 varied between £176.00 and £4,514.00. Putting the burial fee on the list of disbursements with a price range of approaching £4,400.00 most certainly does not give clarity of pricing, it merely serves to mislead.

Ministers fee (optional – for Attended funeral) Celebrants fee (optional – for Attended funeral)

These two should be put together as it is an either or not two separate selections. The fees for a Church of England Minister are agreed by Parliament and laid down annually in the Parochial Fees Order and these are used as a guide for all others. However Ministers who are not part of the Church of England and all Celebrants can charge whatever they see fit. I would suggest it is therefore impossible to give a range although the CoE fee is generally used as a guide so to use this plus £25.00 travelling may suffice but of course clients on reading the price list without guidance will assume this is the same if the service is to be in a place separate to the cemetery or crematorium such as a Church.

Additional funeral directors products and services

As outlined in my comments above this list is woefully inadequate. Many extra services are not included and those that are included in the list need much better and more detailed description. For example, what is meant by disposal of ashes? Tributes and memorials? Stationery? It is abundantly clear that this and the standard price lists have been written by people with little or no understanding of what is involved in a funeral.

- B. Minimum standards for the Attended Funeral and Unattended Funeral ([Schedule A] of the Explanatory Note) – we are proposing to set minimum standards for certain elements of the Attended Funeral and Unattended Funeral and to require Funeral Directors to provide descriptions of the products and services that they intend to provide under the Attended Funeral and Unattended Funeral. Again, if you do not agree with the proposals, please explain why and how you think these could be improved.

The Management Team at A W Lymn absolutely agree that high standards should be set and we have always adopted the view that everything we do in relation to a funeral, both on and off our premises, and front or back of house, we would be happy for the families we are serving to see. That is how we judge ourselves.

Reading the proposed minimum standards they give no real guidance using the words “necessary” and “appropriate” on many occasions. One person’s opinion of what is necessary or appropriate would be completely different to another’s. For example some families feel that it is appropriate to use a cardboard coffin whereas others would find this totally inappropriate and abhorrent. Likewise some families feel an appropriate vehicle for a funeral is an estate car or battered old van whereas others feel it must be a new Rolls-Royce or Jaguar Hearse. This whole section needs to be written clearly defining what the minimum standard expected is rather than using subjective adjectives such as necessary and appropriate.

I know for example that we sold on eBay a hearse that we viewed at the end of its useful life and in effect scrap for marginally over £500.00. Just a few weeks later we found ourselves in a competitive tender situation where that vehicle was being compared to our brand new £350,000.00 Rolls-Royce Hearse and both were deemed equally “appropriate” to service the contract. I am absolutely certain however that members of the general public would not have considered these vehicle equally appropriate and would have selected to use the new coach built vehicle of ours rather than the worn out vehicle of the competitor even if the price had been more.

- C. Register of charitable donations (Articles [5.4] and [5.5] of the Order) – we are proposing that the register includes any donations made by the Funeral Director, either individually or cumulatively of £250 or more to a party connected to the funerals sector, in the previous 12 months and that it is updated every month.

As a company prior to the pandemic we were collecting over £750,000.00 of charitable donations in memory of the deceased. Many of these were for hospices, hospitals, local nurses and other facilities providing end of life care which may of course be in a position to influence people’s decision on funeral directors. Given that these are donations simply handled by us but not made by us are they going to be including in those that must be disclosed? If so I view this as completely unnecessary and to avoid doing so we would seriously consider ceasing this service which would have a detrimental effect on the funding of so many charities.

- D. Information required by the CMA from Funeral Directors (Article [9] of the Order) – we are proposing that the Explanatory Note includes an initial list of funeral directors with five or more branches and ten or more branches that are required to provide revenue and volume information to the CMA. Funeral directors can then notify the CMA if they reduce/increase their number of branches and request to be released from the requirement to provide the relevant information to the CMA.

I completely fail to understand what the number of branches has to do with anything? For example a new funeral directors has recently opened in Ilkeston and it claims to have three branches. In reality it has one and the other two are merely phone numbers of where the two employees live. If you are going to refer to branches you need to define clearly what you mean by a branch.

Further I do not understand why you are looking at branches, surely you should set as your threshold the number of funerals carried out by any business, or the monetary turnover or any business relating to funerals. By using the number of branches, even if clearly defined, you are not necessarily going to receive the details for the bigger funeral directors.

You do not appear to define what you view as a legal entity. I know of some funeral directing groups which are comprised of numerous individual companies, each trading through one branch, and others with a holding company trading through many branches. Is it your intention to ignore those in the first scenario?

You also fail to define what you are including in the funeral numbers. Does it include such things as Environmental Health, Social Services, Hospital Contracts, Children funerals, Traveller funerals, Sub-contract work for such religious establishments as Mosques, Gurdwara's, Sikh temples and Synagogues. There really needs to be some clear thinking before the imposition of such reporting requirements.

Other comments

1. A2 pricing posters on display in windows and reception areas

This makes the assumption that all funeral directors have “shop windows” which will accommodate such huge posters and of course many do not so what do the CMA envisage those without such areas are going to do?

The draft gives no detail about the size of lettering or proportion of the A2 poster which is to be used to display the actual pricing. Will the final legislation give further details on this?

Clearly this legislation comes from people who are unaware of the nature and ambience of funeral homes. They are not glorified shops or indeed banking halls being commercial selling environments but are designed as funeral homes which, as implied by the use of the word “home”, are designed to have an ambience more appropriate to the families home than a commercial retail environment with arranging rooms designed to feel like a dining room or lounge. To cover the walls and windows with large posters advertising services and prices appears wholly inappropriate to me.

Furthermore clients sitting in reception areas or arranging rooms with a price list on the window risk being gawped at by casual passers by reading the prices.

Again a large physical poster displaying all charitable donations in every location would be difficult to administer. Thought must also be given as to how this is decided upon. Should all donations from the funeral group be displayed in every branch under the ownership of that group or should this be spilt into local geographical regions?

2. Vehicle Costs

Splitting vehicle costs would alienate clients in limited situations such as when a body following a death overseas is delivered directly to us by an insurance company agent or if a body goes overseas in which case there would be no funeral locally .

3. Inducements and referrals

The draft regulations states *“A Funeral Director is prohibited from entering into any arrangement with another party which could reasonably be understood to encourage, incentivise or require that party to refer Customers or potential Customers to the Funeral Director or give that Funeral Director preference over other Funeral Directors.”*

Most hospitals issue bereavement brochures in which many funeral directors advertise. It is not uncommon for funeral directors to offer specific incentives to the families using their services who have selected them from these books, for example, in our own case we offer additional added value services to people selecting our funeral service as opposed to others advertising in the same booklet. Is it envisaged that this practice will be prohibited even though the incentive is for the benefit of the client and not the hospital which could be conceived as giving the recommendation?

Although I appreciate that pre-paid funerals are not part of the remit of the CMA, my understanding is that this clause will prevent a pre-paid funeral company allocating a funeral to a specific funeral director at the time of death. As I see it the pre-payment company would have to give the family or personal representative of the deceased the choice of funeral director as to do any other would be seen as breaching this clause by entering into an arrangement with a single funeral director..

Closing comments

Much as I appreciate being given the opportunity to respond on a non-statutory basis to the draft order I am most disappointed to see that once again little notice has been taken of the pressure we are experiencing during this pandemic with the number of funerals at a peak not seen for the last 100 years. Many of us are working seven days a week and upwards of 12 hours a day to provide the best care that we can to our clients and in such circumstances to only be given three weeks to respond to this ongoing enquiry is somewhat disappointing.

It is frustrating to again see little reference to quality and it does feel that the order is all about price and chasing the lowest common denominator. I have said consistently throughout my dealings with the CMA that the majority of clients do not select my funeral company on the basis of price but on the basis of quality of service and recommendation. We have for many years displayed our full services and detailed prices on the internet and guide people to these

and ensure that they have our prices before they are irreversibly committed to using our services.

Further we have actively supported inclusion on Funeral Guide and find on a 52 week rolling basis we are now approaching 1,000,000 obituary views and we receive approximately 1,000 independent reviews a year rating the quality and price of our service. I would recommend that you look to www.funeralguide.co.uk as this enables people to make a proper judgement in terms of a comparison of quality and guide price.

As ever please feel free to contact me should you wish to discuss anything further in relation to my response.

Thank you.

Nigel Lymn Rose

BSc (Hons), MBIE, Dip.FD, MBIFD

Company Chairman and fourth generation

