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After reading the draft information regarding the CMA and the Funeral Industry here are our responses to the questions and our comments regarding the information as a whole.

CMA QUESTIONS.....

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)?

Our Response

- The 'Unattended Funeral' is very poorly described on page 20 of the draft order. It implies that 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". Regardless of whether the family choose to have an event later or not at all, the description misses out on the crucial point that, certainly with the two Crematoria in the 20-mile radius of our premises, it is a regulation that there is NO ATTENDANCE from family or mourners and that a time is allocated to the Funeral Director for the delivery of the deceased only. No Crematorium Chapel time is allowed. This very poor description on page 20 (under the title of "unattended funeral") is potentially misleading. If a family member or mourner is attending, then this becomes an "attended" funeral with different costings including Crematorium fees and funeral director's charges.
If a client were to desire a direct unattended burial service, there is no reduction in the interment fees or the fees, where appropriate, for the purchase of a new grave.
- In the section "fees you must pay" - it says, for a new grave, you will also need to buy the plot, - NOT IN A CHURCH OF ENGLAND CHURCHYARD - THE CHURCH

ALWAYS RETAINS OWNERSHIP OF THE CHURCHYARD and burial is by permission of the incumbent.

On Page 20, standardised price list, "fees you must pay" this has totally confused the situation as regards interments. They have tried to simplify the very complex situation regarding entitlements to graves or interments. It needs stressing that there is a difference between Churchyard interments and local authority Cemetery interments, regarding the entitlement to a grave or interment which is almost individual. Please note that interments in Churchyards and some local authority cemeteries need to have a gravedigger appointed – it involves the same work whether this be an attended or unattended burial.

- The Doctors/ medical referees/medical examiner fees for Cremation Certificates are still required for Unattended cremations.
- Surely the Funeral Officiant (Minister, Celebrant etc.) Is NOT a Funeral Director product or service, it is another element that we would arrange with a third party, unless the family are conducting the service themselves or having no officiant at all?

Draft Explanatory Notes 115b Attended Funerals 'Single Arrangement Funeral.'

- A single arrangement meeting with a family is somewhat impracticable, pre Covid, a funeral director would discuss face to face key items regarding a preferred funeral however there can be a lot of communication via telephone and email for example, in order to satisfactorily complete certain elements; what also needs to be considered is the physical reading and signing of the confirmation information as well as GDPR and the request to start work as funeral directors fall in the category of doorstep sellers (and all relevant documentation). Therefore, one meeting in the standardised pricelist would be unworkable. What is also missing is the human element that some families require more support than others.

Draft Explanatory Notes 116 Burial Fee: the price range displayed is to be for cemeteries in the local area for a weekday, single-depth, 'lawn' grave interment in a coffin, for (if applicable) a resident of the local authority, and where "internment" means the charge for digging the grave.

- Not all graves are classed as 'lawn' and where they are positioned may require extra support when preparing for interment. Double depths could be classed as 'standard' because there is a responsibility for considering the land space available for burials in years to come as well as the human factor for families to be laid to rest together. As a standard approach this would deny spouses to be interred in the same grave.
- The funeral director has a professional responsibility to act in the best interest of the client by ensuring that they fully understand any future implications in respect of graves which may adversely affect their expectations or future wishes and have unintended consequences.
- The dissection of a supply of a simple funeral is having the effect of increasing prices as peeling off elements of what could have been broadly described as a

"Package" is putting a cost to each element, which often previously was provided at no extra charge.

- The extreme additional work in the larger firms providing regular reports will not have the effect of lowering prices but mean that funeral firms have to increase prices to pay the wages of the staff to collate, provide and report this information.
- The proposal for information to be laid in A2 or A3 format in our opinion may need to be addressed, there could be real challenges for companies whose premises cannot fit the criteria for size or have the opportunity for that size printed for example small family firms that work from private residences.
- The Doctors/ medical referees/medical examiner fees should be included in the standard price list and not as a sub section. Under normal circumstances two doctors are required to physically visit a deceased person after death to complete statutory cremation certificates and should not be simply a footnote.
- All in all perhaps the CMA funeral should be limited to a cremation which has parameters more easily identified.
- The Standard Pricelist and CMA funeral proposal may take the personal approach out of organising funerals which we pride ourselves on.
- In our rural area there are so many implications regarding burial that this simply cannot go into a standardised framework or be categorised as extra items to be added.
- Generally, the standardised pricelist is set out very poorly and has omitted information or declassified important elements. This should a guide to be used by funeral directors only so that they can include bespoke components pertaining to their geographical area.
- What is missing is taking into account bereaved families and their emotional competence when a loved one dies.
- The framework should be able to be easily understood so that a university degree in law is not required.

Hope that this is of help to the Consultation,

Yours Faithfully,

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For Alan M. Fawcett Funeral Directors.