

# E. C. GILBERT LTD

FUNERAL AND CREMATION DIRECTORS



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## **Competition and Market Authority Funeral Market Investigation**

### **Response to CMA consultation with particular attention to the display of pricing information as proposed**

We wish to record and make known our feedback on the proposed breakdown of a standardised price list as part of the on-going and most recent consultation, the deadline for responses for which as due by 5pm 17<sup>th</sup> May 2021

While we believe that the both the display of prices to consumers is a positive step and the standardisation of those pricelists displayed would help consumers to compare different establishments with each other in a very transparent way; the content or structure of the proposed pricelist has several shortcomings that as a responsible funeral provider we must highlight.

1) Titles – The attended funeral comprises a series of elements that would indicate that this is intended to be a low cost and simple arrangement although it permits mourners to attend. The implication of its title does not however, suggest the same to the consumer it is attempting to help; and from the outset therefore does not clarify to the consumer the low cost or modest nature of the funeral they are 'buying into' as a result.

The term unattended funeral, advises consumers that this choice is applicable where a ceremony, event of service will be arranged later or separately. This is a false implication given that the majority of unattended funeral consumers do not then go on to hold any other commemorative event, it is often ONLY the unattended funeral that required.

2) Firms only offering unattended funerals appear not to be required to provide a breakdown of costs for their charges, the products that will be provided as part of their services or how their services will be provided in the same way that those providing 'attended' funerals will. This then implies that quality of product and service is only a necessary consideration if provide in a service where consumers will see what is being provided. This is the direct opposite of ensuring value to money and transparency.

3) Fees you must pay. There are a number of inaccuracies within this section that mis-lead the consumer. The use of the term internment is a complete error. Any organisation or person using this term is, as you would already be aware, referring to committing a person to imprisonment not burying a body or laying cremated remains to rest. The perpetuation of this incorrect terms should be avoided and only serves to make a professional organisation look both unprofessional and incapable.

The relegation of mandatory doctor's fees (currently £82 X 2) relating to a cremation to the small print is also a significant oversight. These are mandatory and by far the norm rather than the possibility which is suggested by the layout – while they are not funeral director's fees, nor are any of the fees a consumer must pay in that section – either they must all be included or none of them displayed.

The advice that a memorial will need to be removed is also not always the case. It MAY need to be removed but this may not be the case. Many cemeteries place memorials on a beam which would allow the memorial to remain in place when the grave is opened. In the case of interring cremated remains many memorials are installed in such a way that the interment can take place without its removal. Advising consumers as you propose is to mis-lead them by way of suggesting that there will be costs where there may not. Conversely, the proposed wording allows more unscrupulous business to make charges where there may be no need to do so.

Similarly, if a burial is to take place in a Churchyard rather than a cemetery, the payment of fees does not constitute a purchase, no deed of grant is ever produced and the land remains at all times property of the Church. The proposed advice mis-leads the consumers into believing that they will be acquiring something of a tangible asset, when they will not.

4) Additional Funeral Directors Products and Services – The services of a funeral officiant. This is a third-party cost and should not be listed as part of additional Funeral Director products or fees. Each officiant will set their own fees, possibly subject to additional travel costs and availability and can not be guaranteed by a Funeral Director. With regard to pallbearers. The inclusion of them as shown in this section implies that they are 'optional extras' rather than a logistical necessity. Of course, the option of family bearers would negate the need for them but if the consumer does not opt for family bearers this becomes a very much essential fee. The assumption that family bearers is the norm (implied by the way the use of bearers is portrayed, open up a sizeable Health and safety concern relating to manual handling – something that should be pre-trained and therefore incurs a cost based on time, which appears to have been overlooked.

5) attended funeral – Collecting and transporting the deceased person. In order that the additional funeral director's products and services box makes sense and compliments what is detailed above, it should be specified that the cost is for collection and transporting in working hours with a window to specify what those working hours are. Viewing of the deceased should also be treated the same way, clarifying that costs to view are for a window within working hours.

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on Behalf of E C Gilbert Ltd.