

Please find my initial thoughts regarding the Standardised Price List provided in the Draft Funerals Order.

Sadly, the proposals show a lack of understanding of the profession, the needs of the bereaved and the choices and decision making process (timing).

### Generally

Not all Funeral Directors are the same. Some do not have their own offices, nice premises, nice locations with car parking, etc. These all cost money to provide and can have a great influence on the experience of the bereaved family. Quite unfairly but understandably, there is no mention of these factors. Therefore this whole exercise of encouraging bereaved families to make decisions based on this standardised price list will in effect force Funeral Directors to opt for locations and premises that are in cheaper locations, cheaper sized and with less room for parking etc. Staff retention is a key factor to the quality of the service that a bereaved family receives. Staff are retained when they are happy and well paid. This is also a cost that is not mentioned (and cannot be). You are therefore encouraging Funeral Directors to focus on providing the cheapest. Surely, this is not the outcome you intend.

Reputation is based on years of hard work and the provision of good service. This (good reputation) is the result of investment and comes at a cost. Fundamentally, this is totally ignored by the Standardised Price List and CMA's whole methodology.

### Specifically

Under 'Attended Funeral'

- Why is the 'Make' of vehicle/hearse relevant? Surely, the style is only required (e.g. hearse, hearsette, van)?

Under 'Unattended Funeral'

- It makes it sound like they have to have a service or ceremony at a later date.

Under 'Fees You Must Pay'

- Are these only the third party costs or total costs (Funeral Director plus Third Party Costs)?
- There is no such thing as a typical cost of a burial.
  - The interment fee includes gravedigging and varies greatly by cemetery. Local council cemeteries charge £1215. A burial in a Parish Council cemetery could be half of that. The grave digging (suitable equipment and methodologies, whether spoil (and how much) has to be removed and the cost of doing so, whether the ground is prone to collapse requiring multiple sets of shoring and effecting the available

depth) vary greatly by cemetery and even the part of the cemetery. The difference between the upper and lower quoted prices will be vast (if the funeral director knows what they are talking about) and therefore a nonsense.

- To use the phrase 'the typical cost of the burial fee is:' is misleading. The public won't understand and will initially expect that to be all costs. To then put a note about the purchase price in smaller print under the possible interment fee is very misleading and confusing.
- Does the typical cost of a cremation include organist, use of organ, live streaming, ashes casket. If funeral directors are going to be compared by these third party costs, you will have to expect that these quoted prices will be the bare minimum and additional costs will be added as soon as an ashes casket is required, the family want to have some music, live streaming, etc. The outcome will be the perception of hidden costs.

#### Under 'Additional Funeral Director Products and Services'

Families are encouraged to choose a funeral director by care homes and hospices prior to their loved one dying. This is all part of the 'let's talk about death' ideology which is greatly beneficial to all involved. The home/hospice are then able to contact us at any time, day or night. This is in the best interests of the home/hospice (who usually need the space), the deceased (who can be taken to suitable mortuary storage sooner) and the bereaved family who benefit from the latter.

So is an out of hours collection an 'optional extra'? If the funeral director is unable to discuss the costs of such with the bereaved family (bearing in mind that this will be immediately after the death has occurred), does the funeral director simply say that we are unable to attend? Most families are not present and do not want to talk about such things, sometimes for DAYS. Do you realise how cruel and matter of fact these new proposals are?

Are Pallbearers and optional extra? Quite often, the family will want to carry and then change their mind due to emotional or physical stress. A good Funeral Director always bring their own bearers, especially where a burial is concerned. We have to make sure the funeral can take place. If they are considered an optional extra and the family do not want to pay for them, they won't be there and there will be no one to carry the coffin should the need arise! Surely, such omissions and lack of understanding must be casting doubt upon the whole process that the CMA has taken.

The prices charged by officiants can vary greatly. Even the Church of England have different prices for different situations. Quoting a single price can only be misleading as would quoting the numerous options.

Lastly, the 'so you may choose to take care of some of the arrangements without their involvement, or you can use a different supplier' is also ambiguous and misleading. I am unsure what services you are indicating can be picked or not. The vast majority of the funeral directors services are seamlessly interconnected. From maintaining stocks and supply channels of products, to health and safety related to staff and premises to, providing 24hr on call staff for conveying the deceased into our care. To indicate that elements can be easily picked or discarded pays no attention to the need for the services and infrastructure to be commercially sustainable.

To summarise, the funeral profession and services offered are extremely complex and trying the use the word 'standardised' shows a dangerous lack of understanding. All of these complexities can be clearly explained in two way conversations allowing good and informed quotes to be obtained alongside advice and reassurance. This is simply not possible on a standardised price list. The result will be misled families, and funeral directors having to constantly explain why their 'standard' price list does not mention the thousands of possible options that are available. The profession can provide advice before and after the death has occurred. The 'standard' price list will be meaningless and if the CMA wishes comparisons to be made purely on a published standard price, I'm relatively sure that the very minimum will be quoted for which will generally not be what families want.

We seem to be getting a long way down this road and it seems to me that no one is listening. It also seems like the decisions were made in the very beginning and the rest of the 'consultation' process is a tick box exercise.