



PART 2 – FUNERAL DIRECTORS

Article 3 - Price information for customers

Article 3.1 – we are unclear whether paragraphs 20-21 of the Explanatory Note¹ are intended to include all packages that a funeral director offers, as opposed to just their individual item prices. Our impression is that it is only meant to refer to individual items/services. We believe funeral directors should be required to provide the prices of all their packages, if they offer them, in order to provide full transparency for consumers. This requirement should be included in Article 3.1, or, at the very least, the Explanatory Note should be amended to ensure the expectation of this is clear.

However, in the context of the approach being taken, we are pleased to see a shift to an Attended and Unattended Funeral price, and away from the previously suggested criteria for identifying which prices to display, e.g. the most commonly purchased package.

Article 3.1 (e) - we are delighted to see a requirement included now for funeral directors to display price information provided to them by Crematorium Operators.

We note that the Additional Options Price List is listed as a separate item at Article 3.1 (b) and yet it is not referred to in any articles of the Order relating to requirements for the display or provision of prices, other than in Article 3.1. For example, Article 3.4 does not require 'a Funeral Director who does not have a website but markets itself using other online channels or platforms' to display the Additional Options Price List, despite the fact that Article 3.1 requires this of those funeral directors who have websites. We trust this is just an accidental omission as we note that paragraph 22 of the Explanatory Note does include it. Without this being included at Article 3.4 it would result in an uneven playing field and lack of transparency on the part of some companies.

Article 3.5 – as mentioned above, there is no requirement here or elsewhere for the Additional Options Price List to be provided 'no more than one click away from the homepage'. We believe it vitally important that this specification is also included for this information to ensure robust standards of transparency.

Articles 3.6, supplying a physical or electronic copy on request, and 3.7, supplying a physical copy to anyone unable to attend in person or without internet access, also do not include any mention of the Additional Options Price List.

We are particularly concerned by these omissions related to the Additional Options Price List, given that a number of items, including some very commonly chosen, such as transport for the bereaved, embalming and floral tributes, have been removed from the 'Additional Funeral Director Products and Services' section of the Standardised Price

¹ 20. The full range of additional products and services offered by the Funeral Director must be presented on the separate Additional Options Price List.

21. By full range of additional products and services, we mean all products and services that the Funeral Director offers to Customers.



14 May 2021

Lindesay Mace, Down to Earth Manager
17 Old Ford Road, London, E2 9PJ
www.quakersocialaction.org.uk

List. We appreciate that it is probably beneficial to have the Standardised Price List on one page and that this means some things cannot be included. However, it is crucial that customers have the same ease of access to the prices of all the other options. Without this bereaved people will continue to be disadvantaged by potentially having to ask to see the prices of certain items, including, as we have observed, some commonly chosen items. Once someone has asked to see the price, it is much harder to decline to order it because of a fear that could communicate an inability to afford it, or an unwillingness to pay for it. As found in the consumer research carried out for the CMA, 'Giving a loved one a 'good send-off' was regarded as a last duty of care, where choosing cheap(er) options could be interpreted as not caring and maybe disrespectful'².

Article 3.6 - we are very pleased to see that Article 4.3 has been amended to include that the terms of business at Article 4.1 (a) to (d) should be provided 'in good time prior to the Customer entering a contract with the Funeral Director'. However, we still believe that Article 3.6 should include a requirement to provide this information alongside the pricing information. We have previously evidenced that we frequently speak to clients who have discussed prices with a funeral director, but have come away without any information on their payment terms because they didn't think to ask and they weren't told. As the CMA has found, funeral consumers are very vulnerable and it is a struggle to remember things and to think clearly, which makes it very likely, as we have found, that customers may not ask about this. Although the requirements relating to terms of business that do exist are very welcome and will go some way to protect customers, we do not believe they go far enough. The current order leaves the way open for the following scenario.

A bereaved customer visits or telephones a funeral director and requests the price list, but does not think to request the terms of business. They have access to the internet and, in the case of the phone call, are able to visit the branch, but have chosen not to. They are not about to enter into a contract at that point. Therefore, the funeral director is not required to provide the terms of business and does not. If they visited the branch the terms of business may have been 'brought to their attention', as described in the Explanatory Note, but it is difficult to take in and retain information when you are bereaved.

They go away with the price list, but without the terms of business. They have access to the internet, but our experience indicates they may not think to look for the payment terms. They consider the prices and different options, and decide to engage that funeral director. On returning to the funeral director to make the arrangements, before entering into a contract, they are provided with the terms of business. At this point the customer discovers they are unable to meet the required terms e.g. all, or a large portion, of the costs in advance of the funeral. They do not wish/feel able to change funeral director (it is clear from our own experience and the CMA's investigation that bereaved consumers find it very difficult to do this) and so they are now in a financially difficult position where they need to obtain a lot of money quickly. This could lead them to make choices with damaging consequences, such as borrowing from an illegal money lender³.

² Paragraph 3.28, Funerals Market Investigation - Final Report

³ Stop Loan Sharks see funeral costs cited by some people as a reason for borrowing money from illegal money lenders. While it makes up a small proportion of their figures at the moment, this does not necessarily reflect the truth in terms of unreported



We still believe that including the terms of business at Article 3.6 will significantly improve the protection provided to bereaved consumers. It would also be very easy, and logical, to do and therefore we do not understand why this has not been included.

Article 3.7 – we are delighted to see that it is now required for funeral directors to offer the Standardised and Crematorium Price Lists to ‘any Customer who is unable to visit the Branch or does not have access to the website or online channel or platform’. We have consistently called for prices to be disclosed in initial conversations and in our response to the Provisional Decision Report we suggested it should be required for a funeral director to offer pricing information if it has not been requested.

Schedule 1 – Part A

We are supportive of the Standardised Price List and believe that this will be of great benefit to all customers. We welcome the implicit encouragement for people to compare the prices of different funeral directors and the invitation for customers to consider taking care of some arrangements themselves or to use a different supplier.

1. Is the Standardised Price List (see Part A to Schedule 1 of the draft Order) appropriately presented?

We feel the general layout is appropriately presented. Some of the lines of text would probably benefit, in terms of ease of reading, from having more space between them, particularly in the Attended Funeral, but we recognise that the CMA are attempting to include as much as possible on one page.

Unattended Funeral

We are concerned that the description of the Unattended Funeral implies that people are expected to have a ceremony at a later date when some people may not wish to do this. We suggest the wording is changed to reflect this, for example, ‘This is a funeral where family and friends can choose to have a ceremony, event or service for the deceased person at a later date if they wish, but one is not held at the same time as their burial or cremation’.

We are very concerned that the current proposal does not include any information for customers about what this contains, only what it does not i.e. a service. When carrying out unattended/direct cremations, some funeral directors leave the deceased at the hospital or mortuary, where this is possible, and transfer the deceased straight from there to the crematorium, while others will take the body into their care in advance. We believe customers choosing an Unattended Funeral have as much right to know where the deceased is being stored as those opting for an Attended Funeral.

Choosing an Unattended Funeral does not necessarily mean that the bereaved do not want a viewing, or to have the deceased dressed in their own clothes; we sometimes see clients wanting this. Given that the name and description are all focused around the funeral itself - the fact it is unattended and there is no service - it would not be

cases and trends that they are working towards establishing. <https://reducingtherisk.org.uk/wp-content/uploads/2021/02/Stop-Loan-Sharks-Victim-Support-Report-2020-final.pdf>



14 May 2021

Lindesay Mace, Down to Earth Manager
17 Old Ford Road, London, E2 9PJ
www.quakersocialaction.org.uk

unreasonable for customers to think that all the pre-funeral elements listed under the Attended Funeral are provided. However, some funeral directors do not include this in their normal direct cremation price, so it is important it is clear what is included. Even if someone interpreted that a viewing wasn't included, it could appear that it would be possible to add one on, due to the 'Additional viewing(s)' listing in the 'Additional Funeral Director Products and Services' section, however this might not actually be an option with certain companies. While those solely offering unattended funerals could of course choose to remove this entry from the price list, as stated at Article 3.12, this isn't possible for those companies that offer both Attended and Unattended Funerals. At the very least, funeral directors should be required to state which items from the Attended Funeral list are included in the Unattended Funeral, with any necessary modifications, such as storage of the deceased.

There is no mention of whether transportation of the deceased is within office hours or not. As 'Out-of-hours collection of the deceased's body' is included in the 'Additional' products and services section, it could be that only office hours are included, but a) customers should not have to look at the 'Additional' section and then infer this and b) given the possibility that some items in this list, such as 'Additional viewing(s)', may not be intended to relate to the Unattended Funeral, we do not even feel confident necessarily inferring this ourselves. We also note that Schedule 1 of the Explanatory Note does not even state whether this is to be within office hours or not, unlike with the Attended Funeral.

The Unattended Funeral makes no reference to the potential necessity to pay a doctor's fee.

2. Does the Standardised Price List appropriately describe the items that are included under the Attended Funeral?

We are deeply concerned that the Standardised Price List makes no reference to children's funerals. Schedule 1 of the Explanatory Note says at para 115 that 'The Attended Funeral Price is intended to reflect the price for an at-need funeral for an adult (age 18+) in the UK', but there is nothing on the Standardised Price List to indicate this. Some funeral directors do not charge their basic fees for children's funerals, some do and some charge a reduced fee. It is crucial that families who have lost a child are able to access this information just as easily as those bereaved of an adult. The omission of this from the Standardised Price List implies that any information about it would only need to be provided on the Additional Options Price List. We do not believe this is sufficient. The Standardised Price List is the main place people will look for pricing information, plus, as we have highlighted above, the Additional Options Price List is absent from several of the requirements around the display and provision of prices, including not being displayed in branch windows.

We recognise that the Standardised Price List already contains a lot of information. We also know that the Children's Funeral Fund for England is not widely known about⁴. Perhaps a solution could be to require funeral directors to provide a Children's Funeral Price List, showing which items are provided for free, where relevant, and otherwise list their prices. It could then also include reference to the statutory fund appropriate for that nation, e.g. the Children's

⁴ The Child Funeral Charity advised us at a webinar on the Fund in August 2020 that only half of those eligible benefited from it in the previous year. We also still speak to funeral directors, and families, who are not aware of it.



Funeral Fund for England, provide a link to that Government's information page and state that non-means tested support is available in respect of key items like burial and cremation fees. If a separate price list like this was included in the Order, we believe it should have the same display and supply requirements as the Standardised Price List.

Item 2, 'Collecting and transporting' – if there is an allowance for some funeral directors to operate under a radius other than 15 miles, then we suggest this should be another element where the funeral director has to enter the specifics for their business. Otherwise, customers will be left uncertain as to whether or not the collection will incur them extra charges. For example, it is not uncommon for funeral directors to operate on a 10 mile radius. However, the phrase 'normally within 15 miles' should remain in the Explanatory Note and Schedule 1, Part B of the Order to indicate to funeral directors what is generally expected.

This item also does not state whether or not it is within normal working hours. Schedule 1, para 115(a) in the Explanatory Note suggests it is, but customers cannot see this. As 'Out-of-hours collection of the deceased's body' is included in the 'Additional' products and services list, we assume that item 2 is intended to be only within office hours, but customers should not have to look at the 'Additional' section and then infer this. It should be included for ease and to avoid confusion.

Item 3, 'Care of the deceased person' – we are concerned that this does not require funeral directors to specify whether or not someone can be dressed in their own clothes within this price, if wished. This is doubly concerning given that the Explanatory Note tells funeral directors at paragraph 115 (c) that the Attended Funeral includes 'appropriate arrangements for care of the deceased person prior to the funeral, such as preparing the body for funeral (including (non-ritual) washing and dressing the body in a simple shroud or gown/robe)'. Therefore, the Order currently perpetuates the situation of the bereaved being in the dark about what is included. We see that dressing in own clothes is not even included as a separate item in the 'Additional' section of the Standardised Price List. In our response to the CMA's Scope of Issues we evidenced (example 130) how different funeral directors' approaches to this can be, that they can be unclear in the information they provide and that it can cost extra for this service. Therefore, it should be made clear in the price list whether or not it is included.

We don't believe this information should be tied to whether a viewing is taking place as we have supported clients who do not wish to view, but who still feel very strongly about the deceased being dressed in their own clothes.

Item 5, Viewing of the deceased person – Schedule 1, Part B of the Order states that this is to be during working hours, but the Standardised Price List does not. Therefore we do not feel this is appropriately described. We believe customers should not have to look at the 'Additional' section and then infer that this item is only in working hours. It should be included for ease and to avoid confusion.

As the 'Additional' items section includes 'Additional viewing(s)' it should be stated here how many viewings are included in the Attended Funeral price. Otherwise, this additional cost could come as a surprise. Funeral directors would also potentially be able to reduce this initial allowance at will to levy more charges. While the Explanatory



Note mentions this under 'Further disclosures', it is not presented as a requirement and the Explanatory Note is not legally binding.

Item 6, 'At a date and time you agree' – We do not feel it is clear from the phrase 'at a date and time you agree with the funeral director' whether or not all dates and times are a possibility, within the bounds of staff and crematoria/cemetery availability. We believe it could be possible for individual funeral directors to place restrictions on their offer of the CMA Attended Funeral, as we see many companies do with their most simple package. For example, stipulating that it must be before or after a certain time, or only on certain days of the week. We have seen and previously evidenced many instances of this. Therefore, we are concerned that there is nothing here, in the Order more generally or in the Explanatory Note to require funeral directors to say if their offering does include any such restrictions. If the CMA do not require this, the omission of it will have a significant, detrimental effect on these transparency measures and on the positive impact intended for consumers.

For the avoidance of doubt, we do not object against funeral directors choosing to offer a less expensive service with certain restrictions as this can sometimes be of a real benefit to those struggling financially. However, it needs to be clear what is being offered.

We also have a concern that if the offer of the Attended Funeral is intended to be at any time, on any weekday, that where funeral directors do offer day or time restrictions for a lesser cost, this information may not be easily available to customers. While it could be listed on the Additional Options Price List with a minus price to indicate a reduction, it is maybe unlikely someone would think the Additional Options Price List contained a cheaper *version* of this core element. 'Additional' simply sounds like things you would add on. As a result, bereaved people may have to ask if there is anything cheaper, which they may feel unable or unwilling to do, due to the associated shame. Or they may assume the only thing cheaper is the Unattended Funeral. This could result in people opting for something they don't want, because they feel they have no choice, or committing to higher costs than they would like or are able to meet.

Our suggested solution to all of the above is as follows. We are aware the price list already contains a lot of information. We suggest that the description of the Attended Funeral⁵ is not really necessary as there is no confusion over what this is. It would be far more helpful to consumers if instead this space was used to explain what the price relate to, i.e. the fact it is for an adult funeral and the days/times at which it is available. It could also be used to reference a cheaper version, if offered. For example, 'This is the price for an adult funeral held at any time on any weekday. (We also offer the same service for £xxx, but only on [Tue-Thur] [before 10am or after 3pm]).'

There is also no mention of the staff provided for the actual funeral itself, both the funeral director and other staff needed to transfer the coffin from the hearse to a wheeled bier and, in the case of a burial, to lower it into the grave. The provision of these staff should be made clear as they would be essential. Pallbearers have been contained in the

⁵ 'This is a funeral where family and friends have a ceremony, event or service for the deceased person at the same time as their burial or cremation.'



'Additional' list, a list introduced as 'a range of optional, additional products and services'. Therefore we assume they refer to funerals where a family wants the coffin to be ceremonially carried by pallbearers. However, customers may assume that they are required, especially given no staff are mentioned in the Attended Funeral section. Including this will help make it clearer to customers that essential staff will be provided and that pallbearers are a choice.

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)?

We agree with the items that are included, but believe there are some items and detail missing.

Nowhere in Schedule 1 is anything stated about washing and dressing the body. We believe Part B, at least, should include the option to have the deceased dressed in their own clothes. Please see our comments on item 3 of Part A in relation to this.

Nowhere in Schedule 1 is it stated whether the transportation of the deceased is during office hours only – we believe this should be explicitly stated in all three parts of the schedule.

Part B, para 15 still states 'nearest crematorium or cemetery' when Part A now says 'which can be up to 20 miles from the funeral director's branch premises'. We were pleased to see this change, but Part B should be updated to reflect this.

Part B 15 & 16 - please see our comments on item 6 of Part A.

Additional Comments on Schedule 1 – Part A

Fees You Must Pay

Burial Fee – we are delighted to see that there is now a requirement to provide local fees for this. We also welcome the extra detail about the different elements that may need to be paid for. However, we are concerned that the small print could be easily missed and that people may still see the price range in bold and assume that the total will be within that range. Also that the term 'burial fee' could easily be interpreted as covering all aspects of the burial, including the exclusive right of burial. Given that it is not uncommon for this to be substantially higher than the interment/burial fee this could cause significant problems. We also estimate that the majority of our clients who have a burial do not already own a grave. Therefore we believe it would be best if the exclusive right of burial fee were also listed, even just as a 'From' figure. If this is not included, then we suggest at the least a change in terminology from 'burial fee' to 'grave preparation fee' for example.

We also think it is important to state that the price range given is for a local resident, which could be easily added to the second line of text.



A couple of other comments on wording - the small print refers to possibly having to 'buy the plot' and we wanted to reflect that no-one 'buys' a grave plot for keeps. Instead, you purchase the exclusive right of burial for a specific period of time, which varies. We think this should be clarified. We also note that footnote 1 only refers to closing an existing grave, not a new grave, which might lead to confusion. In this way, one of our team was recently asked by a client if they would have to fill in the grave themselves.

Cremation Fee & Doctors fees – we believe the cost of the doctor's fee should be stated and, as it is a fairly static, simple cost, see no real reason for it not to be. We also think it would be better placed under the Cremation Fee, in the same way that there is extra information under the Burial Fee about elements that may not apply to everyone. The majority of deaths do not go to the Coroner, so the doctor's fee is a very common cost to incur and therefore should be more prominently displayed.

We also wanted to observe that the wrong term has been used for this. The doctor's fee is called a Medical Certification fee, while the Medical Referee fees are charged by crematoria in England and Wales. The two different fees relate to completely different crematorium forms.

Additional Funeral Director Products and Services

Pallbearers – this is currently listed as one figure, suggesting an overall price for a certain number of pallbearers. We imagine this is intended to be for four, but it would be best if this was specified. It is important people know this, as the size of the deceased can mean six are required, which might well incur an extra cost. Another option would be to list the price for 'each' pallbearer, or a combination of the two: '£x for 4 or £x each'.

Additional transfers of the deceased's body (e.g. to their home) – if this is intended to include going to a different venue, before the cemetery/crematorium, on the day of the funeral, e.g. a place of worship, we think it should give this as another example, as we do not think it will necessarily be clear that it refers to this.

The statement at the bottom of this section seems to imply that the arrangement of any other items, i.e. those listed on the Additional Options Price List, could, if wished, be taken care of without the funeral director's involvement, or that the customer 'can use a different supplier'. We find it strange therefore that embalming has effectively been pushed onto this list as a customer would not be able to take care of this themselves, nor are they likely to use a 'different supplier'. As we have previously commented, we strongly believe embalming should be a free choice and agree with the CMA's findings that it is currently probably overused in the industry, but it just doesn't seem logical that it is not included here. Whereas, there is far more chance that a 'Funeral officiant (minister, celebrant etc.)' could be taken care of by the bereaved or arranged separately.

Article 4 – Terms of business

We were very pleased to see that any interest and charges for late payment have been included in this section. We are also delighted to see at para 52 (b) of the Explanatory Note that deposit information should include whether it



'must be paid before the Funeral Director will carry out any services'. However, given that the content of the Explanatory Note is not legally binding, it is disappointing not to see it included in the Order too. The best protection to customers would be provided by including it here. We have supported clients in the past where the funeral director has refused to collect the body before some payment is received, which has caused stress and upset to families. In some cases this has also not been clear at the outset. (1-4 of our enclosed anonymised examples, plus examples 8 & 10 from our 'Scope of Issues' response and example 19 from our 'Information and transparency remedies working paper' response).

Article 4.4 - we are pleased to see that it is now required for funeral directors to offer their terms of business to 'any Customer who is unable to visit the Branch or does not have access to the website or online channel or platform'. However, it does not cover all eventualities, as someone telephoning a funeral director does not necessarily mean they are 'unable' to visit the branch. A simple stipulation that payment terms must be disclosed, or at least offered, in initial conversations over the telephone, at the very least, would cover this.

Article 5 – Disclosure of interests

We would like to reiterate the opinion we have expressed in our previous consultation responses that we firmly believe crematoriums should be included in the businesses in which funeral directors have to declare having a business interest. While we recognise high levels of concentration mean there often isn't much choice of crematoria for consumers, there are nonetheless some areas of the country where there are different options of both cemeteries and crematoria. As a result someone could visit a funeral home that is owned by a company that also owns one of the cemeteries or crematoria nearby. Declaring the Ultimate Owner of the funeral director will not necessarily reveal this as the consumer is unlikely to know the same information for the crematoria. The London borough of Newham is a perfect example of this. Therefore we feel the remedy should be changed to include this. Paragraph 109 of the original 'Information and transparency remedies' working paper put this forward as a potential part of the disclosure requirements 'in order to address the presence of vertical integration in the funerals sector'. No explanation for this omission has been offered and we cannot see any reason for it, especially given that it would incur minimal additional costs for funeral directors.

PART 4 – CREMATORIUM OPERATORS

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?

We would prefer the use of 'Peak Time Fee' and 'Off-Peak Time Fee' as opposed to 'Standard' and 'Reduced' to avoid the possibility of 'Standard' implying that this is what people 'should' have. Equally, 'Reduced' could be off-putting



Response to the draft of the CMA's Funeral Market Investigation Order

14 May 2021

Lindesay Mace, Down to Earth Manager
17 Old Ford Road, London, E2 9PJ
www.quakersocialaction.org.uk

by making people feel that they are being 'cheap' and thereby not 'doing right' by their loved one. Something can also only be 'reduced' in comparison to something else, again setting up the 'Standard Fee' as the usual or expected option. In addition, 'Unattended' is an appropriate description of the nature of the cremation service i.e. that no one will be in attendance. However, 'Reduced' is a description of price and, seen alongside that, so is 'Standard'. In contrast, using 'Peak Time' and 'Off-peak Time' would be more in line with 'Unattended' as they are a description of an element of the cremation service i.e. the time at which it will be held. They are also terms that are readily used, in relation to train ticket prices for example, and therefore we believe it would be understood that they referred to earlier and later time slots. It was interesting and enlightening to see the results of the market research related to the Attended and Unattended Funeral names, so it is a shame the cremation names were not included in this.



14 May 2021

Lindesay Mace, Down to Earth Manager
17 Old Ford Road, London, E2 9PJ
www.quakersocialaction.org.uk

PART 2 – FUNERAL DIRECTORS (Articles 3-5)

Price information

Para 25 – please see our comments on Article 3.6 of the Order

Para 36 – please see our comment on Article 3.5 of the Order

Para 44 – we are pleased to see that funeral directors should now 'explain to the Customer which elements of the CMA Attended Funeral can be removed and whether or not a discount will be applied under these circumstances'. We hope the framing of the Standardised Price List, with its 'Additional Funeral Director Products and Services' section and the Additional Options Price List indicates an intention that consumers should always be able to add items onto the Attended Funeral if they wish, as opposed to being told that it's a fixed package and therefore they must opt for a different package to get certain additional items. However, even if this is the intention, we suggest it is necessary to state this specifically in the Order, or at the least in the Explanatory Note. As we have previously evidenced, it is not uncommon to be unable to add items on to particular packages and therefore to be pushed to a more expensive one containing items they don't want.

Terms of business

We are pleased to see at paragraph 51 that it is now required that this information 'must be displayed in an area frequented by Customers and not, for example, behind a counter'.

We are also delighted to see at para 52 (b) that deposit information must include whether it 'must be paid before the Funeral Director will carry out any services'.

Schedule 1 – Price Information

Paragraph 115 (b) – we are concerned that specifically stating that the Attended Funeral price includes 'a single arrangement meeting' could leave the door open to unscrupulous funeral directors to charge extra for further necessary meetings or contact. We suggest the wording be changed to 'all meetings necessary to formalise the funeral arrangements'. Or 'full support to the client in making the funeral arrangements, including additional meetings and phone calls where needed/required'.

Further Disclosures

We are very pleased to see this additional list of information for disclosure to customers. However, we believe it should be a requirement, not merely an expectation. As a caveat has been provided that the disclosures should be made 'to the extent relevant to the Customer's circumstances', we see no reason why it cannot be a requirement.



Response to the draft of the CMA's Funeral Market Investigation Order Explanatory Note

14 May 2021

Lindesay Mace, Down to Earth Manager
17 Old Ford Road, London, E2 9PJ
www.quakersocialaction.org.uk

We note that all the items listed relate to disclosing if something may be more expensive or carry an extra fee. Naturally, we support this as important, however, it is also important that consumers are fully informed about what may be less expensive. In the same way as has been allowed for in paragraph 134 regarding off-peak weekday cremation fees. For example, some woodland graves (paragraph 127), particularly within regular cemeteries but also at some woodland burial sites, are actually less expensive than the more conventional lawn grave. Equally, where they exist, public/shared graves, where you do not have the exclusive right of burial, and heritage/reclaimed graves, where an old grave is dug deeper to allow a new burial on top, also tend to be cheaper.

Paragraph 129 – it is not only interment fees that can be more expensive for non-residents, but also the exclusive right of burial.

Paragraph 142 – we think the CMA are referring to the doctor's fee here, but the wrong term has been used. The doctor's fee is called a Medical Certification fee, while the Medical Referee fees are charged by crematoria in England and Wales. The two different fees relate to completely different crematorium forms. Assuming that the CMA actually means the Medical Certification fee, as we have stated in our response to the Order, we believe the cost of this should be included on the Standardised Price List, but if not it should at least be stated here that the price should be disclosed.

Schedule A

We agree with the proposal to set out minimum standards for certain elements of the Attended Funeral and Unattended Funeral, including requiring Funeral Directors to provide descriptions of their products and services.

Item 2 – it does not state that funeral directors need to indicate the hours within which they will collect and we believe it should so that people are not then surprised by an extra cost for collection out of hours.

Item 3 – please see our comments on item 5 of the Attended Funeral, in our response to the Order draft.

Item 4 – please see our comments on item 6 of the Attended Funeral, in our response to the Order draft.

