

Comments on Funerals Market Investigation Order 2021

Alternative funeral service provision

There is one significant aspect of the market for funerals in the UK which operates so as to prevent, restrict or distort competition in the supply of funeral services and which is not addressed in the draft Order. This is that Funeral Directors are only obliged to provide information to people about the services which they themselves offer: they are not required to provide information about any alternatives which might be available. For obvious reasons, the person organising a funeral will often not be in a position to make an informed choice about alternatives and it should be the duty of the Funeral Director to provide the information to facilitate such a choice. Not doing so has a number of consequences:-

1. Additional cost

It is likely to result in bereaved families paying more than necessary for funeral services because they may not be aware of the option of having a religious service, regardless of whether or not the deceased had a close connection to a particular faith group. Most faith groups charge little or nothing for a funeral service, and provide that service to anyone who asks for it. There is no “qualification” required. Many churches (and other places of worship) also provide facilities to cater for refreshments after the service at cost price.

It has been reported that the cost of a funeral in Scotland has risen on average by 77% since 2010. Funeral poverty is a significant problem within communities across the country. People who do not have any savings and live on a tight budget will struggle to meet the cost of a funeral, especially where burial and cremation charges have risen so substantially. This can create debt and financial insecurity at a particularly vulnerable time.

There is a misconception that the deceased needs to be a member of a church to qualify for a funeral service. This is not the case. We would therefore like to highlight the importance of Funeral Directors working together with faith groups and other local organisations in supporting people who are struggling with the cost of a funeral. This will ensure an awareness of the support services available from each of these organisations, which will in turn help people who are in financial difficulty as a result of the cost of a funeral.

2. Honouring the wishes of the deceased

It diminishes the likelihood that the wish of the deceased to have a religious funeral service will be honoured. We recognise that secular funeral services will be the preferred option for many, but a large minority will nevertheless wish to have a religious service. Where a Funeral Director is the first point of contact with the family of the deceased, and that Funeral Director does not have relationships with the faith groups in the locality, it is natural that they should direct the family towards their own services rather than those provided by others. We are aware of circumstances where the funeral of a deceased member of a Church of Scotland congregation, for example, did not take place in the church because the Funeral Director did not contact the minister.

We suggest that Funeral Directors should be obliged to make enquiry as to whether the deceased had a connection to a faith group, and to contact that body where it is known that this was the case. This would not only enable a cost-free venue to be secured, but would ensure that the

bereaved are offered the pastoral support they may need at this time. Funeral Directors should inform clients that they are eligible for this support in the early stages of planning a funeral, and should ensure that the relevant church minister or priest is contacted as soon as possible.

With the growth of direct cremations, there is a risk of bereaved families not being aware of the support that exists for them within the community. We urge that Funeral Directors should be obliged to provide information about relevant support groups, including faith communities.

3. **Transparency**

It is common for Funeral Directors to have arrangements by which they recommend the services of a funeral celebrant to the family of the deceased. These celebrants will invariably charge for their services. In the interests of transparency, Funeral Directors should be obliged to provide families with information about the availability of alternative – and free – funeral services such as those provided by faith groups.

Faith groups can provide valuable support to bereaved families as they plan a funeral and grieve for the loss of loved ones. Ministers of religion in general constitute a regulated and trained cadre of people who provide valuable pastoral support to the bereaved throughout the process of planning a funeral, will work closely with Funeral Directors to ensure that funeral services are conducted to a high standard, and will provide ongoing support to families after the funeral has taken place.

We suggest, therefore, that the Order should oblige Funeral Directors to inform clients of alternative services available from other sources, for example local faith groups and places of worship, and of the fact that such services may be available free of charge.

Funeral Support Payment

We also suggest that Funeral Directors should be obliged to provide clients with information on the possible availability of a Funeral Expenses Payment/Funeral Support Payment, and signpost to necessary support networks if appropriate.

Submitted on behalf of the Scottish Churches Committee
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