

FUNERALS MARKET INVESTIGATION

Summary of responses to the consultation on the draft Funerals Market Investigation Order and Explanatory Note

Introduction

1. On 15 April 2021, the Competition and Markets Authority (CMA) consulted on a [draft order](#) (the Order) and a [draft explanatory note](#) (the Explanatory Note) for the implementation of the remedies set out in the [Final Report](#). The consultation closed on 17 May 2021 and the final Order (and final Explanatory Note) were issued on 16 June 2021.
2. During the consultation, the CMA received 113 submissions relating to the draft Order and the Explanatory Note. Non-confidential versions or summaries of the responses received will be made available on the CMA's webpages.¹ The CMA has carefully considered each of these responses and taken them into account when preparing the final Order and Explanatory Note.
3. This document sets out some of the main points raised in response to the consultation. It covers both the main changes which have been made to the Order and the Explanatory Note in response to the points made during the consultation, particularly where the CMA's response to these points may not be clear from the final version of the Order and Explanatory Note, and where the CMA has decided not to change the Order and the Explanatory Note.
4. Capitalised terms in this document have the same meaning as defined in the Order, unless otherwise specified.

¹ <https://www.gov.uk/cma-cases/funerals-market-study>.

Part 1 – Preliminary

Article 1 – Title, commencement and extent

5. A number of parties told us that the implementation period for the substantive requirements of the Order should be extended from three months to six months for the following reasons:
 - (a) There was a lack of awareness amongst some Funeral Directors of the impending Order.
 - (b) Funeral Directors would need to take the necessary steps to ensure that they were in position to comply with the requirements of the Order, which would include updating and redesigning websites. For Funeral Directors with multiple branches, this would be a complex task. Small funeral directors would need to engage web designers with the appropriate skills and would not be able to do so until the Order was published.
 - (c) The implementation period would fall over the summer holiday period and so resources may be harder to secure.
 - (d) The funerals sector had faced the pressures caused by the COVID-19 pandemic for over a year and had continued to engage with the CMA, but this had had an impact on capacity and levels of engagement.
 - (e) The UK remained in a pandemic and it was not clear when (or if) the next peak could present itself.
6. We recognise that some parties have not engaged with the CMA's market study or the market investigation and therefore, may not yet be aware of the requirements of the Order and some may continue to not be aware when the substantive requirements come into force. We also appreciate that the pandemic has had, and continues to have, a significant impact on Funeral Directors and Crematorium Operators.
7. We do not consider that Funeral Directors and Crematorium Operators will need to make significant changes to their processes and policies to comply with the Order. Further, we do not consider that these changes are so significant or unexpected that they warrant delaying the implementation of the Order. Moreover, Funeral Directors and Crematorium Operators will have had time since the draft Order was published for consultation to prepare for these changes in advance of the substantive requirements of the Order coming into force.

8. We do not think that extending the implementation period for the substantive requirements of the Order will necessarily increase the engagement of those parties who are currently unaware of the CMA's remedies implementation process.
9. We are also mindful that if we extend the implementation period beyond three months, the Order will come into force during the Autumn/Winter months, which (irrespective of the pandemic) is the busiest period of the year for the funerals sector.
10. Therefore, we have decided not to amend the Order in response to these representations. We intend to work with the trade associations, in order to increase engagement with the requirements of the Order in the period immediately after the publication of the final Order, when the requirements come into force and through our ongoing monitoring and enforcement activity once the Order is in place.

Article 2 – Interpretation

Branch and Non-branch premises

11. The Standardised Price List (see Part A to Schedule 1 of the Order) requires Funeral Directors to disclose to Customers where the deceased will be kept when under the care of the Funeral Director, specifically whether the deceased will be kept at the Funeral Director's Branch premises or other, Non-branch premises.
12. To provide greater clarity to Funeral Directors in relation to this disclosure requirement, we have distinguished between the Branch (ie the physical premises, sometimes referred to as the 'funeral home', which is open to Customers and from which a Funeral Director sells its products and services) and 'Non-branch premises' (ie the physical premises from which a Funeral Director sells its products and services, such as a call centre, or from which it conducts any part of its business operations, such as a centralised facility for keeping the deceased , which is not open to Customers).

Disbursements

13. Two parties told us that the definition of Disbursements should be amended to exclude the provision of a mark-up to be applied by a Funeral Director when passing on a third-party cost to a Customer. One party told us that this approach would be consistent with that adopted by HRMC.

14. We accept that the definition of Disbursements should not include a reference to a mark-up and have amended the definition as follows: Disbursements means any payment made on behalf of a Customer to a third party for which reimbursement (without any mark-up) is subsequently charged to the Customer, such as cremation and burial fees, doctor's fees, and minister's or celebrant's fees.

Funeral Director

15. Two parties told us that the definition of Funeral Director should not include within scope individuals employed by the Funeral Director.
16. We accept that the definition of Funeral Director should not give rise to individual liability to members of staff and have amended the definition as follows: Funeral Director means a person whose business consists of, or includes the arrangement and conduct of, funerals for and on behalf of Customer(s).

Part 2 – Funeral Directors price, commercial information and transparency

Article 3 – Price information for Customers

Content and presentation of the Standardised Price List

17. A number of responses in relation to the content and presentation of the Standardised Price List suggested that there was a degree of uncertainty among Funeral Directors as to how the Standardised Price List should be completed by Funeral Directors.
18. To provide greater clarity to Funeral Directors on the completion of the Standardised Price List, we have:
 - (a) included an explicit requirement (see Article 3.4) that a Funeral Director must display a separate price for each of the six listed items of the CMA Attended Funeral on the Standardised Price List and the associated headline price of the CMA Attended Funeral, which corresponds to the sum of those items; and
 - (b) provided further guidance on the content, terms and format of the Standardised Price List in the Explanatory Note as follows:
 - (i) The display and supply of the Standardised Price List using the terms and format set out in Part A of Schedule 1 to the Order does not

preclude a Funeral Director from adopting its own branding when presenting the Standardised Price List.

- (ii) On the Standardised Price list (under the heading 'Attended Funeral'), a Funeral Director must display both a headline (total) price (the CMA Attended Funeral Price) and a separate price for each of the six listed items that collectively comprise the CMA Attended Funeral. The price of each individual item of the CMA Attended Funeral must be greater than £0. The sum of the price of the individual items of the CMA Attended Funeral must equal the total price of the CMA Attended Funeral.
- (iii) A Funeral Director who only offers Unattended Funerals (Crematorium Unattended Services and/or Direct Burials) is not required to provide, on the Standardised Price List, the CMA Attended Funeral Price or a separate price for the constituent elements of the CMA Attended Funeral. However, in that case, a Funeral Director must state 'Not offered' instead of the CMA Attended Funeral Price and '-' instead of a price for the constituent elements of the CMA Attended Funeral (in addition to providing the remaining fee and other information on the Standardised Price List, which includes the Unattended Funeral Price). This exclusion is intended to cover those parties who provide Unattended Funerals and principally what are known commonly as direct or unattended burials or cremations.
- (iv) Where a Funeral Director, who only offers Unattended Funerals, offers Direct Burials but not Crematorium Unattended Services, a Funeral Director must replace the headline price for Cremation (funeral director's charges plus cremation fee) with the words 'Not offered' in the section of the Standardised Price List titled Unattended Funeral.
- (v) Where a Funeral Director, who only offers Unattended Funerals, offers Crematorium Unattended Services but not Direct Burials, a Funeral Director must replace the headline price for Burial (funeral director's charges only) with the words 'Not offered' in the section of the Standardised Price List titled Unattended Funeral.
- (vi) A Funeral Director who only offers Attended Funerals is not required to provide, on the Standardised Price List, the CMA Unattended Funeral Price. However, in that case, a Funeral Director must replace the headline price for Burial (funeral director's charges only) and for Cremation (funeral director's charges plus cremation fee) with the

words 'Not offered' in the section of the Standardised Price List titled Unattended Funeral.

Format of Standardised Price List

19. One party told us that the Order should not prescribe a particular digital, or other, format and another party told us that it did not host pdf documents on its web pages, as they could cause accessibility issues and may not be compatible with all devices by which users could seek to access that information.
20. To ensure that all Funeral Directors and Crematorium Operators are able to display the required price information on their websites, we have clarified in the Explanatory Note that if a Funeral Director or Crematorium Operator's website is technically unable to host PDF documents on its website, it must display the required price information in html format.

Article 4 – Terms of business

21. One party told us that its terms and conditions currently ran to two close typed A4 pages and it would therefore be difficult to display this information inside the Branch.
22. We have maintained in the Order the requirement for a Funeral Director to display the information required under Article 4 in the Branch. The Explanatory Note clarifies that this means that the information required under Article 4 must be displayed in an area frequented by Customers and not, for example, behind a counter.
23. To provide further guidance to Funeral Directors on how to comply with Article 4, we have clarified in the Explanatory Note that a Funeral Director may display other information in addition to the information required under Article 4, noting that the items specified in Article 4 are distinct from any broader terms and conditions that a Funeral Director may have, but that it was not a requirement of the Order to do so.

Article 5 – Disclosure of Interests

Ultimate Owner

24. One party told us that that the interpretation of Ultimate Owner relied on a company name and address being listed with Companies House, which gave rise to uncertainty about what a Funeral Director operating as a partnership or

a sole trader would need to do to comply with the requirement to disclose the Ultimate Owner of the business.

25. To provide greater clarity to Funeral Directors operating as partnership or a sole trader, we have amended the interpretation of Ultimate Owner as follows: Ultimate Owner means the company name at the registered company address and/or the ultimate owner of the business if either of these are different from the trading name of the Branch or the or the web-based Funeral Director Services.

Register of charitable donations, contributions and gratuities

26. A number of responses in relation to the content of the register of charitable donations, contributions and gratuities suggested that there was a degree of uncertainty among Funeral Directors as to which charitable donations, contributions or gratuities should be disclosed on the register.
27. The Explanatory Note explains the types of charitable donations, contributions and gratuities that should be included in and excluded from the register.
28. To provide greater clarity to Funeral Directors on the appropriate content of the register, we have explained in the Explanatory Note that:
 - (a) the register made available to Customers in the Branch must cover any charitable donations, contributions or gratuities made by that Branch and/or made by another Branch or by another company within the same group of companies to which that Funeral Director belongs when made on behalf or in consultation with that Branch; and
 - (b) the register made available to Customers on the website must cover any charitable donations, contributions or gratuities made by all Branches.

Part 3 – Prohibited Practices

Article 6 – Inducements and referrals

29. One party told us that the prohibition of Funeral Directors from soliciting for business through coroner and police contracts should make reference to any solicitation made at the time of the removal of the deceased person from the place of death and particularly if removal was from a private residence.
30. To ensure that Funeral Directors are clear on what activity is permissible under Article 6(3), we have clarified in the Explanatory Note that although funeral directors may introduce themselves to the deceased when collecting

the bereaved, they should not actively market their services (eg they should not provide prices or discuss funeral arrangements).

Part 4 – Crematorium Operators price information and transparency

Article 8 – Price information

31. Two parties told us that requiring Crematorium Operators to provide local Funeral Directors with seven days' notice of price changes before they were implemented was unlikely to be sufficient for Funeral Directors to assimilate and present the information to Customers. One party told us that the proposed seven-day period should be amended to 30 days and another party told us that it should be amended to three weeks or 15 working days.
32. We accept that seven days may be insufficient time for Funeral Directors to update the price information they hold on local Crematorium Operators. Therefore, we have amended Article 8.1 as follows: A Crematorium Operator shall supply local Funeral Directors with the price information specified in this Article and keep such price information updated by notifying those local Funeral Directors of any change in the price information no later than 15 working days before such change has effect.
33. We have also clarified in the Explanatory Note that Funeral Directors must update the pricing information provided to them by Crematorium Operators before any price change comes into effect.

Part 5 – Information required by the CMA

Article 9 – Information required by the CMA from Funeral Directors

34. One party told us that the deadlines for when information should be submitted to the CMA should be set so as to avoid deadlines falling during the industry's busiest months (eg January) and should also avoid common financial year ends (eg December or March).
35. We have amended Article 9 to ensure that the provision of information to the CMA for its monitoring purposes avoids the busy period between October and March. We have made similar modifications in Article 10 for Crematorium Operators.

Article 10 – Information required by the CMA from Crematorium Operators

36. One party told us that it was not clear why Crematorium Operators were required to provide revenue from memorials, as the CMA had not identified

any AEC in its Final Report in relation to memorials nor had it referenced memorial reporting in its remedy descriptions.

37. Although we did not specifically state in the Final Report that we would require revenue from memorials, we did explain that we would require revenue information from Crematorium Operators to observe sector trends. Revenue from memorials comprises a material proportion of a Crematorium Operator's revenue and therefore, we require this information to enable us to accurately monitor trends in the crematoria sector.
38. Two parties asked for greater clarity on the information they were required to provide to the CMA in relation to revenue from memorials, specifically how to separate memorial income arising from either a burial or cremation service; the relevant time frame (as the collection of memorial revenue would not necessarily correspond to the relevant cremation services due to delays in the collection of memorial revenue); and whether memorial revenue related to the initial purchase of a memorial or all renewal fees.
39. To provide greater clarity to Crematorium Operators on the provision of revenue information to the CMA, including revenue from memorials, we have updated the Explanatory Note to clarify that:
 - (a) Crematorium Operators must separate revenue from memorials generated from Crematoria Services and burial services using an appropriate allocation method and explain how they have allocated this revenue to Crematoria Services; and
 - (b) revenue from memorials should include all memorial fees collected during the required period (ie the initial purchase of a memorial and all renewal fees).

Part 6 – Enforcement

Article 11 – Compliance statements

40. One party told us that the deadline for when certain Funeral Directors and Crematorium Operators should submit compliance statements to the CMA should be set so as to avoid deadlines falling during the industry's busiest months (eg January) and should also avoid common financial year ends (eg December or March).
41. We have amended Articles 11.1 to 11.2 and 11.4 to 11.5 to ensure that the reporting of compliance with the Order by Funeral Directors and Crematorium Operators avoids the busy period between October and March. The reporting

year now runs from 1 April to 31 March and the compliance statements must be provided to the CMA by the last working day of April.

42. A number of parties told us that 14 days was an insufficient amount of time to report non-compliance to the CMA and that it would be more appropriate for parties to have more time to report non-compliance, as this would allow time for fact gathering and assessment to take place.
43. We have not amended the Order in response to these representations, as we consider that 14 days is sufficient time for Funeral Directors and Crematorium Operators to report non-compliance to the CMA. However, we have amended the Explanatory Note to explain that early notification of non-compliance allows for the CMA to work with the party concerned on actions to end the breach quickly and effectively and to understand whether specific enforcement action is necessary to end any breach. This approach facilitates the efficient use of investigative resource both in the CMA and the party concerned.

Schedule 1 – Price information

Part A – Standardised Price List

Child funerals

44. Two parties told us that the Standardised Price List should be amended to include the prices for child funerals or that a separate price list should be designed and implemented for child funerals.
45. We have decided not to amend the Order in response to these representations. We recognise the immense distress which surrounds the death of a child. However, the Order is intended to apply to adult funerals across the UK and it is not possible for the Standardised Price List to cover every situation and all customer needs. As such, we do not think it is appropriate for the Standardised Price List to provide price information on child funerals, not least as the requirements may be different to adult funerals and will require separate discussions with the Funeral Director.

Viewing of the deceased

46. We received mixed views on whether viewing of the deceased should be included in the CMA Attended Funeral. For example:
 - (a) One party told us that viewing of the deceased should form part of the CMA Attended Funeral, as this service was typically included within a

'standard funeral' and listing this important service as 'optional' and attributing a specific cost to it would lead to funeral directors setting limits on visits and/or charging additional fees for visits in excess of those limits.

(b) Another party told us that the CMA Attended Funeral should only include the necessary services and that to include viewing, which was regularly not required, would only mislead people and therefore, it would be much better to show this service as an additional option to be selected by Customers as and when required.

47. We have decided that viewing of the deceased should remain a core element of the CMA Attended Funeral (and not re-positioned as an Additional Funeral Director Product or Service on the Standardised Price List) for the following reasons:

(a) The composition of the Attended Funeral was based on the Funeral Service Consumer Standards Review's (FSCSR) definition of a simple attended funeral, which itself was developed from the Scottish Government's definition of a simple funeral, both of which include viewing of the deceased as a component.

(b) We understand that many Funeral Directors include viewing of the deceased (without levying an additional charge) as part of a 'standard' package, which suggests that this remains a preferred option for many customers. Removing viewing of the deceased as a core element of the CMA Attended Funeral (and positioning it as an Additional Funeral Director Product or Service) might risk framing the CMA Attended Funeral as an inferior or simple product, meaning that fewer customers may choose to purchase it. However, removing viewing of the deceased from the Standardised Price List altogether could mean that Funeral Directors offer within-office-hours viewings within the overall price of the CMA Attended Funeral, as it is not currently charged for separately.

(c) We have not seen evidence to suggest that there was a significant decline in customer demand for viewing of the deceased before the pandemic. The growth in simple funerals may result in a decline in viewing of the deceased in the longer term, although many funeral directors still offer viewing as part of a simple funeral (typically at more restricted times).

(d) We are also aware that viewing of the deceased is particularly important to some religious and cultural groups.

48. The requirement for Funeral Directors to offer the CMA Attended Funeral, which includes the viewing of the deceased, does not preclude Funeral Directors from offering other products and services to Customers.

Care of the deceased for Attended Funeral and Unattended Funeral

49. One party told us that the minimum standards for the Attended Funeral and Unattended Funeral (see Schedule A to the Explanatory Note) should clarify that the care of the deceased in appropriate facilities would generally mean keeping the deceased in a refrigerated or temperature-controlled environment.
50. We have not amended the Order in response to this representation, as we have decided not to specify detailed back of house standards, including for the care of the deceased. Instead, it is the responsibility of Funeral Directors, working with the trade associations and/or the Inspector of Burial, Cremation and Funeral Directors in Scotland (where applicable), to ensure that their back of house standards meet industry standards. In time, back of house standards, which could include requirements for refrigerated facilities, will likely form part of any future quality regulatory regime following our recommendation to Government that we made in the Final Report.

Appropriate coffin for Attended Funeral and Unattended Funeral

51. A number of parties told us that for the minimum standards for the Attended Funeral and Unattended Funeral, the CMA should not mandate the use of a wood veneer (or higher-grade) coffin, as it was standard industry practice to deploy wood effect veneers and that this type of coffin would be deemed a suitable coffin by Customers and would keep prices lower.
52. It was our intention that the use of 'wood veneer' in the minimum standards for the Attended Funeral and Unattended Funeral would include a 'wood effect veneer' coffin. However, given the representations made on this point, we have amended the relevant minimum standard in Schedule A to the Explanatory Note to clarify that a suitable coffin for burial or cremation would be a wood effect veneer or higher-grade coffin.

Attended direct cremation providers

53. We were told that as providers of attended direct cremations² would fall within the definition of Funeral Director in the Order, such providers would therefore be required to offer the CMA Attended Funeral to Customer and display the Standardised Price List.

² An attended direct cremation is a cremation which includes a service and where mourners are present, but which may not include all of the services typically offered by Funeral Directors for an Attended Funeral, such as burial services, the operation of Branch premises and the viewing of the deceased.

54. We were told that these requirements may cause considerable confusion for Customers and, at worst, effectively prevent specialist funeral directors from providing an attended direct cremation offering without viewing of the deceased. We were told that this would risk dampening the growing demand for this lower-cost alternative to a standard funeral package and may prevent entry.
55. We were told that the CMA should either amend the Order to:
- (a) carve out providers of attended direct cremations from the definition of Funeral Director, given that attended direct cremations did not involve the provision of the traditional services of a Funeral Director; or
 - (b) carve out providers of direct attended cremations from the requirement to offer the CMA Attended Funeral and publish the Standardised Price List.
56. We have decided not to amend the Order in response to these representation for the following reasons:
- (a) As explained in the Final Report, the main objective of the price transparency requirements contained in the Order is to enable Customers to have accessible and comparable information on the products and services offered by Funeral Directors. The exclusion of attended direct cremation providers from the price transparency requirements, particularly the requirement to offer the CMA Attended Funeral and display the Standardised Price List, will undermine this objective, as Customers will be unable to readily compare the prices of attended direct cremation providers and to the prices of other Funeral Directors.
 - (b) We consider that the items included in the CMA Attended Funeral, the composition of which was based on the FSCSR's definition of a simple attended funeral, which itself was developed from the Scottish Government's definition of a simple funeral, represents the items that Customers requiring an Attended Funeral typically require. Therefore, it is imperative that Funeral Directors offering an Attended Funeral should be able to offer, or offer via third party, the items included in the CMA Attended Funeral. We do not consider that the requirement to offer the CMA Attended Funeral will dampen innovation in the funerals sector and we are aware that there are currently providers of attended direct cremations that provide all of the items of the CMA Attended Funeral, including the viewing of the deceased, as part of their offer, including via third parties.
 - (c) Providing an exclusion provision from certain requirements of the Order increases the risk of circumvention of the Order.

57. The requirement for Funeral Directors to offer the CMA Attended Funeral does not preclude Funeral Directors from offering other products and services to Customers.

Other amendments

58. We have made a number of other amendments to the Standardised Price List to reflect the responses to the consultation and the findings of our qualitative research:³

- (a) For Unattended Funerals, the bereaved do not attend the committal and a service (separate to the committal) is optional.
- (b) The body of the deceased may be kept at a Branch or other premises, in order to account for those Funeral Directors who do not operate from a Branch (eg web-based providers).
- (c) Viewing of the deceased must be provided by the Funeral Director if requested by the Customer.
- (d) The burial or cremation service may be limited to a certain range of cemeteries or crematoria and the body of the deceased may be kept further than 20 miles from the Funeral Director's premises.
- (e) The separation of specific religious, belief-based or cultural requirements from Additional Funeral Director Products and Services to demonstrate that for many Customers, their religious, belief-based or cultural requirements are not 'additional' products or services but core to the funeral services they require.
- (f) We have amended the Additional Funeral Director Products and Services listed on the Standardised Price List to reflect those deemed to be the most frequently offered by Funeral Directors and purchased by Customers and clarified that these are examples of the types of products and services that Funeral Directors may supply or may arrange for a third party to supply to the Customer. In particular:
 - (i) A number of parties told us that the Standardised Price List, and specifically the CMA Attended Funeral, should include embalming. Given that embalming of the deceased is often not necessary, we have not included it as part of the CMA Attended Funeral. We have, however, included embalming as an item under the Additional Funeral

³ See [Funerals Market Investigation Transparency Remedies – Qualitative Research Report and Funerals](#) and [Market Investigation Transparency Remedies – Annex to Qualitative Research Report](#).

Director Products and Services, in order to clearly signal to the Customer that it will be for the Customer, with guidance from the Funeral Director, to determine whether embalming is necessary.

- (ii) A number of parties told us that the inclusion of celebrants under funeral officiant, which also included ministers, as well as the requirement for a Funeral Director to provide a price for a funeral officiant, was inappropriate, as, unlike ministers, celebrants did not provide fixed fees. In response, we have amended the Standardised Price List to require that for funeral officiants, including celebrants, a Funeral Director must provide a price to a Customer upon request. This will enable a Funeral Director to understand the Customer's needs before recommending a celebrant and providing the celebrant's price information.
 - (g) We have amended the Additional Funeral Director Products and Services listed on the Standardised Price List to require Funeral Directors to display a price for those items that can be priced upfront (eg additional transfers of the deceased person's body) and to provide a price on request for those items that cannot be price upfront (eg services supplied outside of office hours).
59. To support Funeral Directors in accurately completing the Standardised Price List, we have also provided further guidance in the Explanatory Note on what should be included in the Attended Funeral Price, specifically:
- (a) all relevant staff costs;
 - (b) collection of the deceased person from the place of death, which includes but is not limited to a private residence, hospital, hospice or care home;
 - (c) one or more meetings during which appropriate instructions can be taken from the Customer;
 - (d) a service to take place at a date, time and location agreed between the Funeral Director and the Customer, taking into account as fully as possible the wishes and needs of the Customer.
 - (e) the Funeral Director's presence to coordinate events on the day of the service; and
 - (f) a sufficient number of staff to transfer the coffin from the hearse or other appropriate vehicle into the building where the service will take place or to the graveside.

60. To account for Funeral Directors who do not have Branches or do not offer all of the services typically offered by a traditional Funeral Director, we have also explained in the Explanatory Note that Funeral Directors should disclose:
- (a) if applicable, the difference between Branch and Non-branch premises, as well as all Non-branch locations at which the body of the deceased will be kept in addition or as an alternative to Branch premises;
 - (b) all locations at which the body of the deceased will be kept in addition or as an alternative to the Branch premises;
 - (c) any limitations on where the burial or cremation can take place; and
 - (d) if applicable, the body of the deceased may be transferred to the cemetery or crematorium in a shared vehicle.

Part C – CMA Attended Funeral

61. We have updated the elements of the CMA Attended Funeral to align with the description of elements of the CMA Attended Funeral included in the Standardised Price List.