

## **CMA Consultation 23 August 2024**

### **The SAIF Leadership and Members Response**

#### **Executive Summary of SAIF's response**

We understand that the Competition and Markets Authority (CMA) is reviewing the impact of the funerals legal order of June 2021 which was implemented in September 2021.

The CMA are directed to consult with the funeral industry for their understanding of the impact assessment of the legal order. The CMA will thereon research wider channels including consumers to take these findings to the CMA Board late 2024.

SAIF is of the view that another MIR on price controls is an unnecessary expense to the CMA. The reasons for this are that there is little bandwidth in reducing costs further without distorting the funerals market in favour of larger funeral corporations and VC funded online providers, thereby diminishing the SME sector that currently provides over 60% of services to consumers. The SME sector has historically always been best quality and least cost to the consumer. Prior to the CMA Legal Order SAIF's research showed that independent funeral directors were £1,000 cheaper than the corporate funeral directors.

The CMA legal order has brought the larger corporations into line with pricing of the independents.

SAIF have surveyed approximately 30 independent funeral firms across the UK for their understanding of the state of the market as it related to the CMA standardised price list and transparency measures.

The summary of the responses are detailed in the section with the CMA questions below for your consideration.

The summary comments from the SAIF leadership are:

#### **1. Significant transparency has occurred through the Funerals legal order 2021.**

It is now mandatory that funeral directors who have a digital footprint whether a website or on social media complete a standardised and additional options price list.

Prior to the CMA legal order of 2021, SAIF's Code of Practice dictated that the 'simple funeral cost breakdown' be transparently shared with consumers should they telephone or visit a funeral home. This was agreed as early as the Office of Fair Trading discussions in the 1990's.

However, the CMA legal order has mandated that online pricing be mandatory. This is something SAIF was always in support of. Alongside this was the shift in digital awareness and usage. The consumer journey has moved to over 70% of customers starting their purchase by viewing funeral home websites, this is a timely occurrence.

Therefore, it is clear that the CMA legal order has succeeded in mandating transparency.

There are of course, some questions about the details required of the SPL, and the costs of updating the local crematoria pricing (as changes are not aligned in the industry).

One important consideration is that a funeral purchase is a unique contract. It involves deep emotion and hopefully is a rare occurrence for the consumer to organise in their lifetime. Usually it would be two or three funerals to organise in a lifetime.

Many consumers will have used their trusted local independent funeral director over generations and the trust continues. In that regard, the requirement for SPL and posters may appear oversized to them.

SAIF continues to advocate also for a measured, proportionate and co-regulation scheme for funeral directors. Since the UK Government will not mandate that funeral directors belong to a trade association, this leaves gaps where non-affiliated funeral homes are free to operate without scrutiny by a trade body, nor provide an independent customer complaints process.

It was noteworthy to learn that the vast majority of non-compliance across funeral homes are the non-affiliated ones.

SAIF has asked the Ministry of Justice to support a communications awareness campaign for consumers to be informed about the choice of using a trade body funeral home that are accountable to a Code of Practice (which is soon to be aligned with the Scottish Government's Code across the UK), and a non-affiliated funeral home without scrutiny or accountability. But we wait to hear from them on this request when the Minister's engaged with us in March 2024, ✂

## **2. Absorption of inflation over the past couple of years, is unsustainable for the full service funeral director model for the medium term.**

With the inflationary pressures in 2022-24 with utilities and third party products rising at an exponential rate during this period funeral homes absorbed as much of this as they could withstand. This occurred alongside the introduction of the CMA legal order which took effect.

The inflationary prices occurred from rising costs of electricity, gas, coffin prices, fuel and vehicle parts, crematorium pricing and a whole plethora of ongoing costs, including staff salaries.

It is remarkable that costs for the funeral service have not risen until recently.

## **3. Direct (unattended) cremation's (DC) noticeable rise**

The DC option benefitted during the Covid-19 government restrictions in 2020-21 and we have seen the latest estimates that DC is now approximately 17% of the "at-need" market.

What is quite different is that the "pre-paid" funeral plan market which itself has been regulated from the 29<sup>th</sup> July 2022 now has some 63% of the plans are direct funeral plans sold.

TV marketing spend has soared at unprecedented numbers with the Pure Cremation spending £21m in 2023 on TV and various other channels of marketing. The Co-op

Funeralcare has spent £4m and has seen a successful increase in their prepaid funeral plan sales.

What is of concern to SAIF is that the biggest seller, Pure Cremation of these unattended funeral plans, have no flexibility to upgrade should the customer or their next of kin wish to adapt the service. Therefore, the only options are to fulfil the funeral plan with emotional distress to the customer, or cancel the plan, which is a whopping £350 cancellation fee!

DC has ~~an~~ impacted on the SME funeral home in such a way that the infrastructure of property and vehicles cannot be sustained in the same manner if the unattended to attended mix of funerals continues to shift.

There may be opportunities for partnership working, which has existed with carriage masters hiring out their vehicles,

There is concern that national online providers with no funeral home infrastructure are not monitored or whose quality control is vague at best.

The concern in SAIF has been the acquisitions of independent funeral homes by one of the corporations in the UK. These are not just funeral directors who are coming to retirement with no succession plan. Clearly the regulatory journey over the last seven years has taken a toll on the confidence of many, whether funeral care is no longer the primary focus of the funeral director, and SAIF are actively providing training to current owners to equip them and their teams for a regulated environment whilst accomplishing the professional care to bereaved families.

#### **4. The CMA standardised price list**

Some members of SAIF have set the CMA SPL to what was formerly known according to the SAIF Code of Practice, as the simple funeral.

Other members have used the CMA SPL as their traditional funeral service, their standard full service funeral.

SAIF will be interested to learn what the CMA discovers through their planned customer testing of awareness of funeral fees, and their understanding thereof.

It seems there is certainly greater availability of the information for consumer to be aware of the cost, and in this respect, the CMA legal order has achieved the outcome of seeing customers shopping around online and becoming aware of choice, if they so wish.

This will become even more apparent with a new generation of tech aware bereaved who are more mobile to use the transparency available to assess and weigh up choice.

#### **5. Conclusions**

- A new MIR on price controls is unnecessary.
- The CMA legal order has been effective, and it will be timely to revise in the light of the medical examiners implementation and other changing aspects of funeral choices.

SAIF Business Centre  
7 October 2024

## MEMBERS RESPONSE TO THE CMA CONSULTATION September 2024.

**Q1. How has the cost of conducting a funeral changed? (i.e. the cost to funeral directors and crematoria operators) changed? Please consider both costs on average and by funeral type.**

- Direct cremation has had a big impact on funeral directors, as they are far cheaper, so less profit to the company & as a crematoria by having to reduce their fee, also online companies reducing costs greatly but do not always have the standard of service we provide.
- Increased Staffing Costs, Business Rates Increases, Fines from Local Hospital Trusts, Local Council Fee Hikes at Crematoria.
- The costs that funeral directors face have increased - within overheads, rent, utility costs, and salaries have all seen large increases over the last few years. Within the cost of sales, coffins have also increased due to various external events
- We are definitely seeing a huge increase from suppliers, utility companies, fuel, staff wages and rents. The fact we have absorbed these costs to date cannot continue and we plan to increase prices on bespoke and direct cremation options in 2025 the costs will rise by 8%. Crematoria now have split fees between environmental charges, cremation costs and a separate charge for an organists. Taking this into account crematoria on average still manage to have increases between 5 and 10% year on year and in some areas a lot higher.
- Costs have increased for us due to fuel, rent, gas and electric bills, staff, coffins and supplies all increasing. The crematoriums have also increased their costs I presume due to similar reasons.
- All third party costs have increased.
- "Far more work, time and resources go in to funeral arrangements now. More then ever before. If you compare what FD's do hourly on a funeral arrangement, to that of a solicitor, accountant or wedding planner we are very cost effective, higher risk of making an error which can not be resolved and dealing with members of the public who are very upset or distressed. Where as a solicitor or accountant will invoice Â£100.00s of pounds per hour, give a less personal service and are not as responsive as a funeral company would be.
- We as funeral companies offer more then before, and take on more risk, however what we charge (how much we increase prices per year) does not reflect the time and effort that goes in to a funeral in 2024 compared to what we charged in 2014.
- Crematorium operators are chalk and cheese in difference. All private crematoria are clean, tidy, modern, you see the investment, the staff are motivated and support the FD, as they know the FD are the ones who support the family and appreciate the cremation

going to them. The private ones tend to charge more than a local authority, but the service and facilities are far greater than that of the authority one.

- However with the majority of local authority crematorium, they are old, dated, dirty, no lack of care, massive under investment. At times it is somewhat embarrassing conducting a funeral at local authority crematorium due to the lack of investment, and then for what they charge it is appalling.
- We try to inform families that for a small extra fee compared to the local authority crematorium, they will get a longer service in a much nicer facility in a private one."
- Increase in general overheads including, but not limited to, energy, fuel, insurance, staffing and pensions. Increases in supplier charges.
- Utility costs at the funeral home, third party disbursements and inflationary pressures. However, much of the latter has been absorbed by funeral homes to remain competitive.

**Q2. How does this compare to the trend in costs prior to the market investigation?**

- More online companies such as pure cremation seem to be entering the market.
- I believe that since the market investigation costs have increased a lot more than before it. Since 2020 we have faced the pandemic, and the subsequent inflations across all areas of the business
- Prior to the market investigation we averaged around a 3% increase per year. We have managed to keep our increases low since the market investigation but it is becoming more difficult to do that for next year.
- Not sure. Price increases seem to happen yearly before and after this.
- Increased at a much higher percentage
- We do not feel the CMA have truly understood or looked at the crematorium costings and the value for money.
- The increase in overheads in particular has been substantial over the last 2-4 years.
- The competitive environment has increased post covid with mass media advertising for direct cremations. There are concerns about the quality and service options with this channel provided by the national online companies, with lack of choice and additional options for the family's grief journey.

**Q3. How has the price of a funeral to consumers changed? Please consider both prices on average and by funeral type. What factors have contributed to any change in prices?**

- Consumers can't compare like for like just by price, they have to look at the standards & facilities a company has
- Our prices across all packages have not increased to the same level as the cost increases. We have absorbed a lot of the cost increases ourselves in the short term.

- There is an increase in Direct Cremation due in part to covid restrictions and the increase in advertisement on TV from national online companies. I have noticed an increase in Direct Cremation charges this year and i think that trend will continue. I have seen very little change in the personalised / bespoke funeral costs since the market investigation in my local area
- It has increased all round due to the factors previously mentioned.
- Due to the costs of running a business, our professional services have had to increase in a similar rate. The greater increase in third party costs has also been a factor.
- "Cost of running a business is the main contributor. A 20% hike in national minimum wage over the past two years have pushed wages high, energy costs, red tape and general running cost force funeral companies to put their prices up to cover these increases.
- The only way businesses, and not only funeral businesses, will survive are for costs to go up to the consumer."
- Prices have increased by approximately 4.5% for traditional funerals. Increase minimal in directs in order to remain (barely) competitive with low price and online operators; however there needs to be an increase in these type of funeral as there is no value to the funeral business in carrying them out at present. The only way low price operators will be able to sustain these prices is by cutting corners.

**Q4. How does this compare to the trend in costs prior to the market investigation?**

- The consumer could make their own mind up not base it purely on bottom line price
- Again, I have seen no positive impact in the slowing of price changes.
- I believe that our charges have increased at the same rate as prior to the market investigation, however costs to the business have increased massively during this time.
- Public are certainly more aware of costs and are more knowledgeable about what type of funeral they wish
- Prices have increased more I would say due to the other factors like energy costs etc
- The rate of increase was not as sudden prior to the investigation.
- Inflation and high wages were not prominent prior to 2021, it is only now we are feeling the effects and being reflected in the investigation.
- Costs remained static for some time not only due to the investigation, but also due to the restrictions imposed during the covid period which makes it harder to compare.
- This seems a similar question to 6?

#### Q5. What factors have contributed to any change in quality?

- As a business we strive for high standards constantly, before or after any regulation, Our quality has not changed we just hope the companies that are not up to scratch adhere to this too
- New regulation and red tape have caused more time to be spent arranging a funeral and less time available to assist families.
- None specifically, however we have introduced a simple funeral to meet the demand of this market
- From my own business perspective there is no change in quality in fact we try and offer better value with better quality. However, i do see non trade association Funeral Directors offering poor quality products and facilities. ✂  
 . ✂ many online suppliers call Direct Cremation a funeral which it is clearly not.
- Quality has remained the same however costs have increased to keep it that way ie: coffins now cost us more and we can only absorb some of that cost and the rest has to be passed on to the customer
- Increase in demand for Direct Cremations and the open options to reduced services.
- "None from the funeral director point of view.
- The quality of local authority services to the bereaved has lowered but their costs risen. As mentioned, under investment in services and facilities lack of compassion or flexibility."
- A majority of funeral directors try to maintain the quality of service that they offer despite the external pressures being put upon them. There does seem to be an excessive push towards low cost and ultimately low quality funerals in the media, which does not necessarily match up with the demand that we see from consumers who in large are still wanting a more traditional quality service.
- Great question for members to answer. No change

#### Q6. How does this compare to any trend in quality prior to the market investigation?

- More online companies such as pure cremation seem to be entering the market.
- I would say the CMA investigation has had little to no effectual impact on the prices or fees associated with arranging or carrying out a funeral.
- I believe that since the market investigation costs have increased a lot more than before it. Since 2020 we have faces the pandemic, and the subsequent inflations across all areas of the business
- Prior to the market investigation we averaged around a 3% increase per year. We have managed to keep our increases low since the market investigation but it is becoming more difficult to do that for next year.

- Not sure. Price increases seem to happen yearly before and after this.
- Increased at a much higher percentage
- We do not feel the CMA have truly understood or looked at the crematorium costings and the value for money.
- The increase in overheads in particular has been substantial over the last 2-4 years.
- The competitive environment has increased post covid with mass media advertising for direct cremations. There are concerns about the quality and service options with this channel provided by the national online companies, with lack of choice and additional options for the family's grief journey.

**Q7. Has consumer awareness of quality changed since the market investigation? If so, what has driven this change?**

- Direct cremation TV campaigns
- I don't think that consumers are aware of the differences in quality in funeral directors. Some will just pick the cheapest regardless of reputation or facilities
- The consumer is more aware of options which is due to media awareness of the market investigation and regulation in (Scotland). Not sure if it means they are aware of any change in quality
- Not that we have seen with our customers. I think there is a lack of understanding of the service they would receive from large direct cremation companies and consumers are price driven rather than quality driven as there hasn't been a huge investigation into quality, plus most consumers would not even be aware of the market investigation either.
- Yes and even more so since the Funeral Planning Changes and ✂
- No
- There has in recent months been more of an awareness but I feel this is more due to the various scandals that have hit the media surrounding rogue operators.

**Q8. Have relationships between funeral directors and crematoria operators changed?**

- not in my opinion
- Not from what we have seen.
- We perhaps work together more closely
- Not at my local level we all want the best for the consumer
- Yes
- yes - much less flexibility between providers mainly due to operational changes.

- Private operators appear to be more friendly and actively seeking to work with funeral companies.  
Whereas the local authorities are not willing to change, invest or work with funeral companies.
- Not especially - albeit there are now an increased number of operators in the marketplace. This has not stopped crematoria prices increasing however as the new operators are providing higher quality modern facilities albeit at increased cost. This increase in cost does not however prevent the consumer from choosing them over older and cheaper facilities.

**Q9. What effect, if any, has the increasing prevalence of direct cremations had on how funeral directors and crematoria operators interact?**

- Some local authorities will not offer cheaper fees for a direct cremation, therefore its again the FD keeping the fees as low as possible to compete in the market
- Our local council owned crematoria have raised prices to such an extent we are now having to travel 45 minutes for each direct cremation to prevent our local community from being wildly over-charged.
- Crematoria are more reactive to the increased demand for direct funerals, and are introducing more price sensitive packages
- We have experienced no change in how we interact with our local crematoria
- The crematorium near us that is council run (Hull City Council) are now offering their own services and clearly not charging themselves the same cremation fee we are charged as there is no way they could offer all aspects of their funeral package if they charged themselves the same as us. They also do not show a CMA standardised pricelist on their website or anywhere in the building yet are offering funerals. This is therefore an unfair market which has turned the relationship between them and funeral directors in the area sour.
- A massive impact - for example nearly 50% of cremations at our crematorium per day are now direct cremations.
- Private crematoriums have actively worked with FD's to lower their prices and offer direct/unattended/cheaper attended slots.

Some local authorities have too, however they are unable to match the private operator prices. Some are still considering offering direct slots.

One crematorium in the West Midlands, has seen a 50% drop in cremations over the past 15 years due to private operators taking their market share. They have 50% of their slots free all week, yet they still will not offer a lower cost cremation fee to combat the direct cremation companies.

This is taxpayers money being wasted and not actively looking to generate more.

- Certain operators give unfair preferential rates to the low cost operators, or discounted rates to those who push the low cost option while maintaining/increasing their standard prices.

**Q10. If so, what has driven these changes in consumer behaviour?**

- TV campaigns
- Lack of local council funding has led to over-zealous price increases
- Probably mass marketing by national providers
- Consumer behaviour can be driven by trends and i suspect that is what is going on just now
- Don't understand what this question relates to
- Cost increases
- TV advertising, Covid and a perception that funerals are expensive.
- There seems to be a distorted view of the demand for the low cost option and a view that "thats what everyone wants" - which is clearly not the case

**Q11. If so, do you consider them to be positive changes for consumers?**

- No as it's not like for like
- Not really - it is not clear what they are buying, and the mental health impact of direct cremations on the bereaved post disposal cannot be monitored. We have seen a big increase in those seeking counselling as a result of the choice their loved one has made. Currently 90% of those seeking counselling are as a direct result of no funeral service taking place.
- The consumer must have choice, therefore, any new option is a positive
- No, the direct market will effect consumers in the future. A funeral is for the living, not the dead.
- A push towards low cost/quality can never be seen as being good for anyone.

**Q12. If so, do you consider them to be temporary or permanent changes?**

- Permanent
- Permanent
- I suspect they will level out as more take place and the effects on the bereaved become more prevalent.
- Permanent but the increase will eventually level off

- Temporary, I feel the direct market is a bubble, which we will see decline in years to come.
- Temporary - as a large majority of consumers know what they want and will not be swayed by these pressures.

**Q13. Do you believe the increase in direct cremation has impacted operating costs?**

- Yes
- Yes, it has changed how we operate
- Yes, it is unrealistic for businesses to change their business model overnight to accommodate lower margins. You will find the market changing with more and more independents selling or going out of business. The future market place will be controlled by large national companies which will lead to price increases. Independents need to survive to keep the market place competitive.
- Yes. All other services will never reduce in cost now as they are having to absorb some of the loss in direct cremation funerals. As mentioned earlier, if all funerals became direct we could not make enough profits to run the standard of vehicles and premises etc that we have nor reinvest into them when needed to ensure we maintained that high level of service.
- Yes massively impacted.
- Yes as funerals provided are now less profitable, meaning companies have less profit to re invest or expand with.
- Yes - value in low cost funerals to a funeral business is very low, despite the service and facilities that still have to be provided and is subsidised for by higher quality traditional services.

**Q14. Has it impacted the conduct of funeral directors?**

- no
- Not, we carry out our directs with the same dignity and standards we would any other funeral.
- Not for us, but there is an increase of companies setting up without knowledge or skills to compete in this market.
- I hope not I can only speak about my own business and other local companies but standards must remain high at all times whether the consumer chooses a DC or a personalised option.
- We operate with exactly the same level of conduct towards a funeral and those involved no matter what the cost of the service is. I think all good Funeral Directors would always ensure their conduct is what should be expected.

- The vast majority of funeral businesses place the value of their good name and quality of service way over the impact of the pressures being put on them. Sadly as we have seen, there will always be exceptions to this rule, but any form of price regulation will not prevent the poor conduct from the few rogue operators.

**Q15. Has it impacted funeral prices?**

- Yes
- I think it may have caused traditional funerals to be more expensive as there is a 'more affordable option' should people want it.
- Again, not for us, we offer 3 packages - Direct, Simple and Bespoke to accommodate the needs of families.
- It will on future prices as no business can operate on lower margins. I think the DC market will keep increasing on price year on year.
- Funerals have increased due to the reasons mentioned before, not because of the market investigation or direct funerals.
- YES
- Some see it as a race to the bottom and have to lower their prices to "compete" however it is impossible for some companies to lower their prices due to overheads. Families need to understand quality over cost.
- Not directly

**Q16. Has it impacted consumer choice or behaviour?**

- There is more choice available to the consumer.
- Yes, more people are wanting to look into direct cremations.
- There is more talk about direct cremations. Often when the full facts are explained, families choose to move to a more simple or bespoke funeral as it gives them the chance to say goodbye personally.
- Yes, not everyone understands what a Direct Cremation is and many can be surprised when they realise they cannot attend. Choice is ok but it must come with knowledge.
- I think the costs seem greater for funeral directors as we are generally smaller and can't absorb costs as easily as large groups therefore may have higher costs for our funerals than larger companies and direct cremation companies. Consumers may choose some of the large companies for direct cremations if they are price led on choice rather than quality led.
- YES
- No

- No - the vast majority of consumers know what they want and are not swayed by costs.

**Q17. What effect do you think the CMA Order has made to the costs to funeral directors and crematoria operators; prices to consumers; consumer behaviour; quality of funeral services; and the conduct of funeral directors and crematoria operators?**

- We have to be transparent & show what we believe to be a fair price, however others do not comply & nothing is done about it. The consumer can't judge like for like just by looking at the bottom line cost. Some companies quality of service has suffered as its sometimes a race to the bottom.
- I do not feel the CMA order has had any beneficial impact. I do not think the standardised price lists are laid out in a helpful or easy to understand way. I do not believe there has been any or enough enforcement on those companies who still are not doing what they should. Since it's introduction, we have not had a single customer ask us anything to do with our Standardised Price List.
- Very little effect to any. It is good that prices are now on websites and in offices, however the standardised price list doesn't really reflect a 'normal' funeral so it can cause confusion
- Well we have had to endure costs for printing standardised price lists in particular when crematoria do not always change their price lists at the same time we may have to change posters 2-3 times per year. There is no other industry that has to show a third party cost and this should be removed from the standardised price list we should only be responsible for our own pricing. Consumers have benefited because most Funeral Directors have avoided increases and absorbed the costs due to the threat of price capping by the CMA. However, with ever increasing costs to the FD that will not continue as it is impossible to sustain that business model. There is no change to service or quality in my own business but i see others who have dropped standards to absorb ever increasing running costs. You only have to look at what's happened in the country recently to understand when you have low cost FDs. It is no coincidence that these companies offered poor service and atrocious standards. My local Crematoria i have no issues with
- The order stated an issue surrounding the lack of visibility to customers of the level of quality of care given to the deceased by funeral directors yet I don't think the order has given any more transparency with regards care and quality and has been more price driven. I also do not believe the CMA Standardised pricelist has given any more clarity to consumers as I am a funeral director yet would find it difficult using that template to work out what a funeral would cost. I believe the order was needed yet not done in the right way and has actually caused more confusion to consumers and funeral directors alike meaning it is not uniformed across the board and also crematoriums that offer funerals are not conforming to the order across the country. I think customers could now be making the wrong choices for what they require due to how confusing it now is or they are only looking at prices as it doesn't highlight quality of a provider.

**Q18. Please consider how you expect the Order to change the funerals market?**

- I hope that prices will not be capped and if the order is for everyone then everybody needs to comply.
- Enforcement. The CMA have seen fit to set out a programme of rules for us to follow. They have not done anything about following up on them which has led to some, even now, not publishing prices online despite them being reported on numerous occasions.
- Not at all
- The order should have been beneficial to both the consumer and the Funeral Director. I think Independents are in favour of anything that helps the consumer. I do not believe there is a huge amount wrong with my profession in the main we are honest, respectful and want the best for the consumer. The order should have been designed to help the consumer understand funerals and the services on offer but i feel the Standardised Price did not achieve its aim and consumers clearly do not understand it when comparing prices. Threats of price capping will do nothing to enhance the order in fact all it will achieve is lower standards
- I think it is driving consumers towards choosing a provider on cost and not quality and that in turn will drive them towards large groups or direct company providers as the information they now have is confusing.
- It hasn't changed the market
- I don't think it will. Unless they incorporate quality of service, back of house and what a company can offer. The cost point is pointless.
- Very little influence (*SAIF: by this response, we understand this to be customers are not asking for the CMA funeral, ie, SPL*).

**Q19. Please consider how any changes compare to current and past trends.**

- before the order people had the freedom to shop around and make their own decision not just based on price.
- Those who published their prices online are still doing it now and following the CMA regulations. Those who didn't, still aren't.
- N/A
- The only change i see is in Direct Cremation being more prevalent but the impact this is having on the family are becoming more apparent as they start to realise there was no formal farewell or acknowledgment of the persons life. We are already seeing this in our own data where families are asking us for bereavement help as they feel guilty about having a DC
- Before I think people looked more into a business and what they could provide rather than the focus being on price.
- The trend of less fuss and reduced fees is more common.

- "We have not seen a change like this before, and the majority of families will choose the company they have always used over a lower cost option. Unless they have had a bad experience or poor funeral.
- That being said, some will choose the cheaper funeral company but then regret may happen after as they have not received the funeral they expected."
- Slight increase in directs - however I feel this has more been a result of changes experienced during covid than as a result of the order