

This response comes from the Child Funeral Charity (CFC: Charity reg no 1156387). The questions in the *Funerals market insight gathering* consultation (23 August to 20 September 2024) do not afford the opportunity for us to give details of the issues we wish to raise, but we have put as much information as possible in our response, which this document supplements.

The CFC was established in 2013 to provide financial support to parents organising the funeral of a child between 12 weeks' gestation and 17 years of age, although we have now applied to the Charities Commission to raise the upper age limit to 18. We work closely with the Children's Funeral Fund (CCF), which was established in 2019 to cover the basic costs of babies' and children's cremations and burials.

We have learned, from seeing copies of numerous funeral directors' invoices, that parents are charged very variable amounts – from virtually nothing to thousands of pounds – depending on where they live and which funeral director they choose. The industry myth that 'child and baby funerals are free' is not universally true.

We are concerned that neither the *Funerals market study* (CMA, 2020) nor the current consultation mentions babies' or children's funerals. Our response seeks to increase the CMA's awareness of the current practices around such funerals, and to request its assistance in providing a simple, standardised approach to them in the following ways.

- **Standardising the minimum age at which adult funeral fees can be levied**

Individual funeral directors decide at what age a child's funeral costs the same as an adult's: we have seen cases where this is 5, 12, 16 or 18. We consider the last to be appropriate.

- **Specifying which items should be provided free of charge for children's funerals**

There is no consistency as to whether funeral directors charge a professional fee for services such as collecting and caring for the body of a deceased child. Some larger chains have nationwide policies of not charging professional fees, and of providing a hearse and coffin free of charge. Most other funeral directors charge for these goods and services.

- **Raising awareness of funding and other support available from the CFC**

Hearses, family cars, flowers, orders of ceremony, webcasting, urns and other items are usually charged as additional expenses. These items can be very expensive and are usually profit-making items for funeral directors. We supply many such items free of charge, but we can only do so if the funeral director, or another professional working with the parents, refers the case to us before the funeral director has ordered the items. This often does not happen, so families pay significant amounts of money for items that we could have supplied.

The situation is exacerbated because many parents – who, as the CMA notes (CMA, 2020 at 3.14), are even more vulnerable than most people who are organising relatives' funerals – agree to purchase extremely expensive items such as caskets, horse-drawn carriages etc.

- **Agreeing potential next steps**

We have a great deal of detailed information that we would like to share with the CMA, with the aim of exploring potential ways of improving the situation for people who have undergone what, for almost all of them, will be the most distressing experience of their lives.

Anne Barber, Mary Tomes, Kevin Tomes, Jill Maguire, Stephanie Pywell
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5 September 2024