

FSCSR Consultation document: Transparency

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Introduction

Dear stakeholder

This is the second of two FSCSR consultation documents.

The FSCSR is an independently chaired project that seeks to bring together the skills and knowledge of industry experts and key stakeholders with a view to improving quality, standards and outcomes for funeral service consumers.

One way we hope to achieve this is by identifying and practical steps that could be taken to improve consumers' ability to usefully compare services offered by different service providers. In particular, we intend to make recommendations on how transparency in relation to services offered, the standard of those services and pricing could be improved. The focus of this consultation document is on these aspects of the FSCSR's work.

We are aware that there are a wide range of views on the potential risks and benefits of introducing transparency requirements (e.g. online pricing), just as there are diverging views on what information consumers want and need to be able to access. We believe it is important that all views are taken into account and have sought to appeal to widest possible range of stakeholders.

We welcome responses from members of the public, funeral directing businesses, academics, religious groups, consumer interest groups, regulatory bodies and other stakeholder organisations. If you know of an organisation or individual whose experience, knowledge or perspective could help inform our work, please make them aware of this consultation so that they can respond.

We would like to reassure you that the recommendations contained within this document are drafts and are not set in stone. They have been developed with the benefit of the experience and expertise of [the FSCSR Transparency Working Group](#) with the understanding that change may be necessary, dependant on feedback from this consultation exercise.

The first consultation paper, which deals with questions related to regulation and acceptable minimum standards, has already been circulated to SRG members and can be accessed via the [FSCSR website](#).

The Steering Committee is very much looking to the experience and insight of stakeholders to shape its final recommendations.

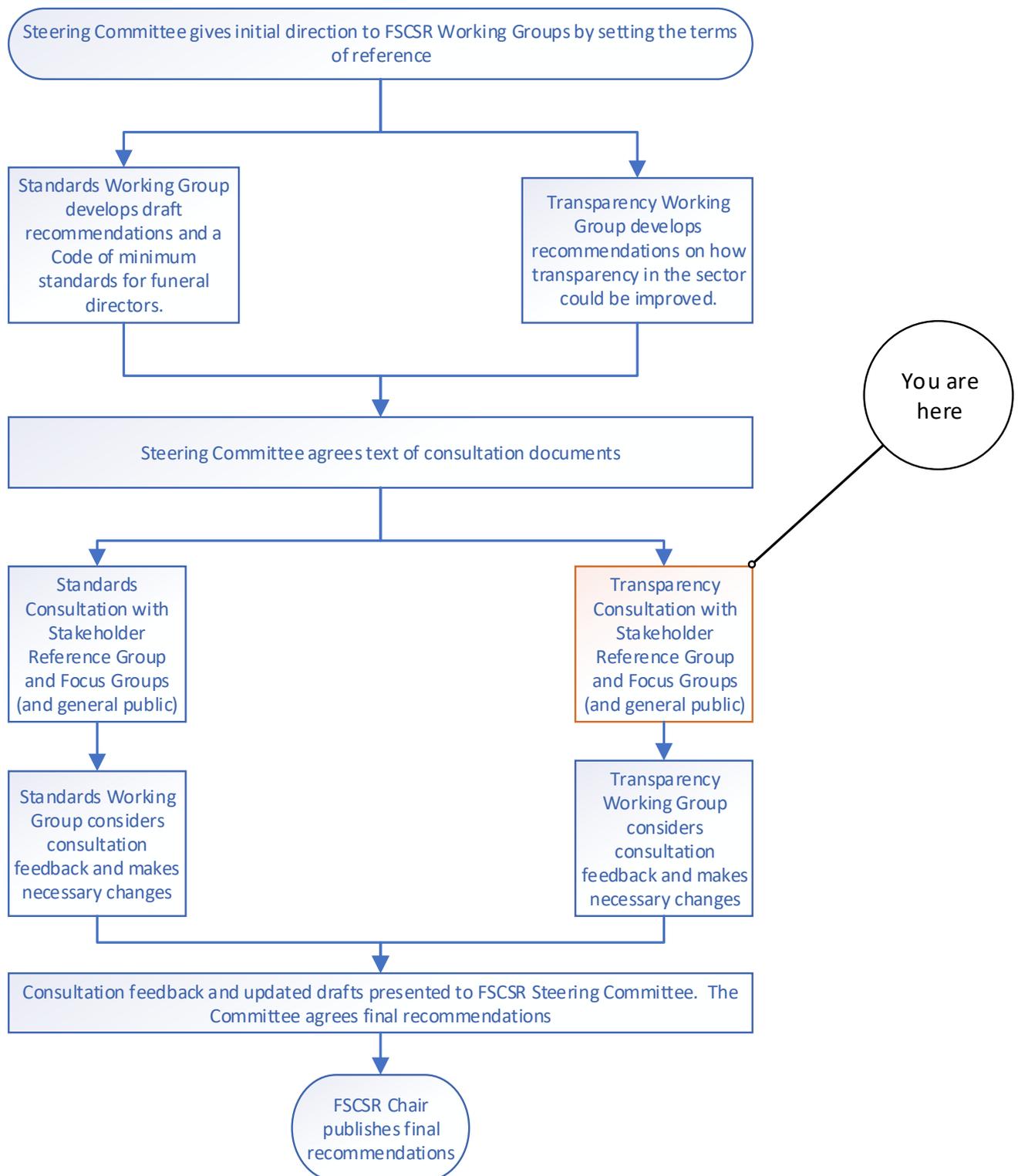
We cannot overstate the importance of your participation. The success of this project will be measured through its ability to secure the participation of, and agreement from the funeral profession, consumer groups and other key stakeholders. This is your opportunity to influence our recommendations and we welcome your feedback.



Lewis Shand Smith

Independent Chair, the Funeral Service Consumer Standards Review

FSCSR Recommendation Development Process



For more information about the Funeral Service Consumer Standards Review, why it was set up and who is funding its work, please see the [FSCSR Background Document](#), which is available on the FSCSR Website.

Part 1: Defining the issue

We acknowledge that funeral consumers are not always equipped with the knowledge they need to ensure they can obtain the funeral services they require at a fair price. Unlike many other significant purchases, such as booking a package holiday or buying a new car, consumers tend not to have much advance knowledge about the funeral service options available to them. This means that they can be quite reliant on information immediately available to them at the time of need, which is often the emotional stress of recent bereavement.

The funeral industry has come under criticism for generally failing to make sufficient information about their offerings and pricing options available to the public. In particular, it has been highlighted that limited pricing information is available to consumers online and little means by which to judge quality standards.¹ This can make it difficult for time constrained consumers to compare different providers and the service options available to them.

The lack of easily accessible information about funeral service options can make it difficult for consumers to identify what services are within their price range and could lead some consumers to make direct contact with a funeral director without first having any conception of the service they require, or the likely price of that service. While most funeral directors pride themselves in providing excellent advice, taking into account the needs of the prospective client, this advice is not independent as the funeral director will almost always have a commercial interest in attracting business to their firm and selling services that are profitable to them.

The phenomenon of information asymmetry (the current imbalance of information between funeral directors and consumers) is not unique to the funerals market. Consumers often rely on the advice of interested experts, such as estate agents and financial advisors, when making unfamiliar purchasing decisions. However, the particular context of a funeral purchase, including the emotional and time pressures typically involved, has the potential to exacerbate the impact on consumers. It is perhaps telling that, once a consumer has made direct contact with a particular funeral directing business, they tend to purchase the services of that firm.²

The Competition and Markets Authority's (CMA) Market Study Final Report, published in March 2019, noted an additional but related concern: that many consumers don't even seek to compare the service offerings of more than one funeral director before making their final purchasing decision. With these consumers failing to shop around at all, it is easy to see how many might not get the best deal available to them.

Although issues around consumer behaviour are distinct from the outlined problem of transparency in the funerals market, according to the CMA's report, this counter-productive

¹ [CMA Market Study Final Report, para. 16](#)

² Consumer research recently conducted on behalf of the Competition and Markets Authority (CMA) indicated that only 14% of consumers compared the services of two or more funeral directors before purchasing a funeral. (https://assets.publishing.service.gov.uk/media/5c9ba9bf40f0b633f6c52a7e/funerals_market_study_-_final_report.pdf para. 3.11)

consumer behaviour is being driven, at least in part, by the current lack of transparency of information about price, service quality and range offerings in the market.³

Whatever the reasons of some consumers for choosing not to shop around, it seems clear that, at present, even a motivated consumer could struggle to make a useful comparison of different funeral service options available to them. This is not, in our view, an acceptable situation. **The FSCSR has therefore sought to identify ways in which transparency in the funerals market could be improved for the benefit of consumers who are motivated to compare the price, service, quality and range of offerings available to them.**

Matters that fall outside of the scope of this consultation:

It is important to acknowledge that certain important considerations fall outside of the scope of this work and are not therefore explored in this consultation paper:

Future enforcement and auditing of compliance with FSCSR measures

This paper sets out possible ways that funeral directing businesses could improve the way they make information available for the benefit of consumers who wish to compare the offerings of different providers. It does not however consider how compliance with these measures or the accuracy of any information conveyed by funeral directing businesses should be checked and monitored.

This is a question that will need to be addressed once a suitable way to make information available has been identified. In a separate paper, the FSCSR has sought views on whether an independent regulator should be appointed to regulate funeral directing businesses. It is possible that an information auditing/compliance role could fall to such a regulator.

How the impact of any proposed measures should be assessed

We have intentionally left the question of what sufficient change should look like or how it should be measured unanswered. This is primarily because the problem itself was identified by the CMA and not the FSCSR. In attempting to address the problem, we simply have accepted the CMA's findings as presented in their reports.

The best way to measure the success of our proposals would therefore be to replicate the work that the CMA carried out in order to identify the problem at some point in the future. If the measures have been successful, the new set of findings should be quite different. We believe such an assessment would be most appropriately conducted by a newly appointed sector regulator or, in the absence of such an organisation, the CMA.

Consumer behaviour

Wider issues around consumer behaviour (e.g. consumer reluctance to shop around) will not be explored in this paper. This is because they are distinct from the issue of information transparency. We are also aware that the CMA is looking into this issue and look forward to seeing the outcome of this work.

If you want to read more about the CMA Market Investigation, all of the CMA's publications can be accessed at the following web address: <https://www.gov.uk/cma-cases/funerals-market-study>.

³ [CMA Market Study Final report, Para 4.95](#)

Part 2: Proposed measures

Overview of proposals

We have consulted separately in relation to a proposed set of minimum standards for funeral directors (the FSCSR Code), which would require funeral directing businesses to comply with the following transparency requirements:

- Their full pricing information is made available clearly at both their funeral home(s) and, where they have an online presence, online.
- Clients and prospective clients are given sufficient information to enable them to make informed decisions about the services they need, how their matter will be handled and the options available to them.
- Clients receive full and clear information, both at the time of engagement and when appropriate as the matter progresses, about the likely overall cost.

If you disagree that funeral directors should be required to comply with the three requirements listed above, please take some time to read and respond to our earlier consultation paper, which can be accessed here at the following web address:

<http://www.fscsr.co.uk/wp-content/uploads/2020/01/FSCSR-standards-consultation-document-to-be-published-31-Jan-2020.pdf>

The proposals outlined in this document assume that funeral directors will be required to meet these requirements and seek to set out how they could do this in a way that maximises the benefit to consumers.

Overview of Proposal 1

We are seeking your views on our proposal that all funeral directing businesses should make certain key information available to consumers, in a standardised format, both:

- in a prominent place in their business premises; and
- in a prominent place on their business website (or other online presence).

Assuming that a significant number of businesses do this, we think this will improve the market for the benefit of consumers by enabling them to:

1. make quick and easy comparisons of key information about funeral service providers;
2. make early informed assessments about a service provider's price-range and market position compared with their competitors; and
3. in the case of particularly price-sensitive consumers, quickly ascertain whether they can afford the services of a particular business without risking the embarrassment of discovering this in a face-to-face encounter with a funeral director.

Overview of Proposal 2

We are seeking your views on our proposal that all funeral directing businesses should be encouraged to complete a comprehensive questionnaire about the services they offer and to make this information publicly available.

Assuming that a significant number of businesses do this, we think this will improve consumer outcomes by:

- providing consumers with comparable detailed information on which to decide which service provider is right for them;
- generally raising awareness of the services offered by funeral directors by making this information available;
- highlighting important considerations to consumers who may not otherwise have been aware of them (e.g. different care options for deceased people); and
- providing third-party information aggregators (such as comparison websites) with a large body of useful information that could be presented to consumers in creative and more user-friendly format.

Combined solution

Combined, we believe these proposals will enable consumers to quickly identify a number of suitable funeral directors that can meet their requirements at a price within their budget, before looking in greater detail at the offerings of each. Only once a consumer has a reasonable idea of the service they require (and the likely price of that service), would they need to make direct contact with a funeral directing business.

These proposals are set out in greater detail on the following pages.

Proposal 1: The FSCSR Key Information Form (KIF)

The FSCSR Steering Committee is minded to recommend that all funeral directing businesses should make 7 key pieces of information freely available to the public in a standardised format.

This recommendation would see funeral directors with an online presence present this information in a prominent place on their business website.

The proposed format is set out below:

| Key Information Form (for 'at need' customers) | |
|---|--|
| 1. Where can I find a full list of your prices and service options? | |
| This question is designed to allow the business to immediately signpost prospective customers to this key information. Funeral directors would be encouraged to provide a link to their online price list in this box. | |
| 2. What is the price of your least expensive funeral that meets the criteria set out at the foot of this form? | 3. What is the price of least expensive direct cremation/burial that meets the criteria set out at the foot of this form? |
| Please see explanation below. | Please see explanation below. |
| 4. If I change my mind after engaging you as my funeral director, will you charge me (and if so, how much)? | |
| This question is designed to: a) highlight to consumers that they are free to change provider at any point; and b) ensure they are aware of the business' terms in relation to charging for part-completion of a funeral. | |
| 5. At what location(s), and by whom, will the person who has died be cared for? (if locations are owned or operated by anyone other than your business, please specify) | |
| This question is designed to highlight the fact that businesses can have different approaches to caring for the deceased and to ensure the consumer understands where and by whom the deceased person will be cared for. | |
| 6. How soon will I need to pay the bill? (please also include details of any deposit payable) | |
| Payment terms and deposit requirements can be just as important a consideration as then end price for some consumers (e.g. a person with limited available funds, awaiting social fund support). This question is designed to enable the consumer to quickly identify whether they would be able to meet the business' payment terms. | |

| 7. Can you provide information about state support that may be available to help pay for the funeral? | |
|--|--------|
| We can advise on how to apply for a Funeral Expenses Payment (England, Wales and Northern Ireland) | Yes/No |
| We can advise on how to apply for Funeral Expense Assistance (Scotland) | Yes/No |
| We can advise on how to apply for Bereavement Allowance | Yes/No |
| We can advise on how to apply for Bereavement Payment | Yes/No |
| We can advise on how to apply for Bereavement Support Payment | Yes/No |
| We can advise on how to apply for Widowed Parent's Allowance | Yes/No |

The answer to this final question is likely to be of particular interest to consumers with a very limited budget. It may also serve to highlight to some consumers the fact that state support may be available.

The FSCSR funeral service criteria (questions 2 and 3 on the KIF)

We are minded to recommend that all businesses offering services that meet the requirements of either, or both, of the two sets of service criteria outlined below should make the price of these services openly available to consumers, ideally using the Key Information Form on their website or other online platform.

| Entry criteria | Direct Criteria |
|--|--|
| <i>Attending the necessary arrangements (such as completion of necessary certification, taking instructions from the client and providing guidance on registration and legally-required procedures);</i> | <i>Attending the necessary arrangements (such as completion of necessary certification, taking instructions from the client and providing guidance on registration and legally-required procedures);</i> |
| <i>Provision of the necessary staff for care of the deceased;</i> | <i>Provision of the necessary staff for care of the deceased;</i> |
| <i>Provision of an appropriate coffin suitable for burial or cremation;</i> | <i>Provision of an appropriate coffin suitable for burial or cremation;</i> |
| <i>Transportation of the deceased person from the place of death (normally within fifteen</i> | <i>Transportation of the deceased person from the place of death (normally within fifteen</i> |

| | |
|--|---|
| <i>miles but taking into account local circumstances);</i> | <i>miles but taking into account local circumstances);</i> |
| <i>Appropriate arrangements for the uplift of the deceased and care of the deceased person prior to the funeral, in appropriate facilities;</i> | <i>Appropriate arrangements for the uplift of the deceased and care of the deceased person prior to the funeral, in appropriate facilities; and</i> |
| <i>Viewing of the deceased person, during normal working hours, by appointment;</i> | <i>Transportation of the deceased to a crematorium or cemetery at a date and time agreed with the funeral director and clearly described to the client.</i> |
| <i>Provision of a hearse or other appropriate vehicle direct to the nearest crematorium or cemetery at a date and time agreed with the funeral director and clearly described to the client; and</i> | |
| <i>The opportunity to hold a service at the cemetery or crematorium at the time of committal.</i> | |

The entry funeral criteria are based heavily on the Simple Funeral definition set out in the Scottish Government’s 2019 Funeral Costs Guidance, which is presented at [Appendix A](#).

Enabling meaningful comparisons

We are conscious that a criticism of previous attempts to define an entry (or ‘simple’) funeral package has been that the definitions have not been prescriptive enough to allow for a meaningful ‘like for like’ comparison. For example, the two very different funeral service offerings described below could arguably both fall within the definition of a Simple Funeral as set out in the Scottish Government Guidance:

| Simple funeral A | Simple funeral B |
|---|--|
| No out of hours service. | 24-hour service. |
| Deceased person collected following day by removal staff. | Deceased person collected shortly after death by knowledgeable funeral home staff who are able to advise family on next steps. |
| Deceased person transported to air-conditioned cold room. | Deceased person transported to fully refrigerated mortuary facility. |
| Viewing strictly by appointment but limited by staff capacity, available facilities and deterioration of the deceased person. | Viewing possible during staff working hours. Various viewing rooms available. |
| Family given opportunity to arrange a funeral service. | Family are supported by funeral director in arranging a suitable funeral service. |

| | |
|---|---|
| Deceased person transported to crematorium in a private ambulance. | Deceased person transported to crematorium in a traditional hearse. |
| Funeral staff leave immediately once deceased person has been taken into care of crematorium staff. | Funeral staff remain until service has concluded to ensure family feel supported. |

Our proposal is not immune from this complaint but we believe that the Funeral Director Questionnaire (proposal 2 of this paper) has the potential to mitigate this problem by equipping consumers with other easily comparable general information about different service providers.

For example, a consumer might identify two or three service providers that serve their local area, each offering funerals that meet the Entry Funeral Criteria at similar prices. Before making their final decision, the consumer would be able to compare the providers' detailed responses to Funeral Director Questionnaire to determine which represented better value for them (one might offer more flexible viewing hours).

In doing so, they might become alerted to other service considerations that they had not previously given thought to, such as a natural burial. This could prompt them to start the search process again, equipped with a better understanding of their needs.

Avoiding creating a false floor in the market

Another criticism of previous attempts to define an entry level funeral package is that doing so risks setting a false floor in the market by giving consumers the impression that no cheaper options are available. For example, a consumer could opt for a 'simple funeral' package, believing it to be the cheapest option available to them, despite having no desire to view the deceased person. In doing so, they risk paying more a service aspect they do not require, simply because it was included in the advertised package.

We accept that the same could be true of our proposed entry funeral criteria. However, we have sought to mitigate this by also setting out a set of direct burial or cremation criteria, which represents the actual floor in the market (it is our understanding that direct cremation or burial will always be the least expensive option available to consumers).

Our initial view is that any risk that our proposed entry funeral criteria might cause some consumers to purchase service bundles that are not quite right for them would be outweighed by the benefits of providing consumers with an easily identifiable point of reference for determining how expensive a business is in comparison with its competitors.

Not dictating what consumers should expect from a funeral

Another criticism of previous attempts to define a universal 'simple funeral' package is that doing so risks limiting consumer choice and reinforcing a traditional funeral service model that might not be right for everyone.

A subtle but important distinction between our proposal and earlier attempts is that we are not proposing to define particular packages, but are instead setting out two sets of minimum criteria. In accordance with this proposal, funeral firms would simply be encouraged to identify the least expensive of their existing services that meets each of these criteria and advertise them as such. The main advantage of this approach is that it does not attempt to push funeral businesses to provide a particular type of service and nearly all

funeral directing businesses already provide a service that meets at least one of the two sets of criteria.

A point of reference for consumers

A clear advantage of our proposal is that consumers will have access to one or two pricing points of reference in relation to each service provider, which is vastly better than the situation at present. Even if a consumer wants something far more personalised and costly than an entry level funeral, the ability to compare the lowest prices of different providers will provide a useful indication of where each provider pitches their services in the market in relation to its competitors.

We also feel it is important that price-sensitive consumers are able to identify whether or not they can afford the services of a particular business without risking the embarrassment of discovering this in a face-to-face encounter with a funeral director.

A drawback of our proposed approach is that some businesses could appear artificially expensive. For example, the cheapest FSCSR criteria compliant service option of a business that only offers high end options is likely to seem disproportionately expensive in comparison to a business that offers an entry level funeral. However, we also believe this risk is counter-balanced by the wider benefits this proposal would bring to consumers.

Question: Do you agree that the consumers would benefit if all funeral directing businesses completed the proposed Key Information Form (KIF) and made this information available in a prominent place online? (please explain your answer)

Question: Do you think the proposed 'Entry' and 'Direct' criteria should be changed in any way? (please explain your reasons)

Question: Are there any other questions that should be included in the KIF? (please explain your reasons)

Proposal 2: The FSCSR Funeral Director Questionnaire (FDQ)

The FSCSR Steering Committee is minded to recommend that all funeral directors should answer a standardised set of questions (“the Funeral Director Questionnaire”) and to make their answers immediately and openly available to the public. This recommendation would see funeral directors with an online presence make their questionnaire answers available online.

An important distinction between this proposal and proposal 1 (the KIF) is that it is not envisaged that this more detailed information would be set out in such a prominent place on the business website. It will be sufficient that a consumer can easily locate the Funeral Director Questionnaire (FDQ) should they wish to, ideally via a weblink located near to the KIF.

| The FSCSR Funeral Director Questionnaire (FDQ) |
|--|
| Section 1- Client support |
| <i>What is your approach to helping people to arrange funerals?</i> |
| This question is intended to give the funeral directing business an opportunity to set out how their general ethos and how they believe they differ from their competitors. |
| <i>Who will answer the first telephone call during working hours / out of hours?</i> <ul style="list-style-type: none">- please set out the hours in which you operate a telephone answering service- if you outsource any part of your telephone answering service, please provide details of the service provider |
| This question is intended to highlight differences between the telephone answering services offered by funeral firms. |
| <i>Who would come to collect the person who has died, and do you offer this service out of hours?</i> |
| This question is intended to highlight differences between the collection services offered by funeral firms. |
| <i>Do you offer home visits?</i> <i>(please indicate any limitations to this service, for example exclusions from certain packages, additional charges or distance limitations)</i> |
| This question is intended to highlight differences between the customer service offered by funeral firms. |
| <i>Who will help me and how will you communicate with me during the arrangement process?</i> <i>(please set out the early steps to arranging the funeral with your business)</i> |
| This question is intended to give basic information about initial meetings and to highlight differences between businesses’ approaches to communicating with their clients. |

Section 2 - Care for the person who has died

Who will physically care for the person who has died?

(please give details of any training undertaken and/or qualifications held by these people)

This question is intended to elicit information about any third-party agencies used to care for deceased people and to highlight quality differences between staff education and training.

What measures are taken to preserve/stop deterioration of the deceased?

(please give details of any refrigeration or temperature-controlled facilities you use and, where relevant, explain your approach to embalming)

This question will allow the funeral directing business to set out a detailed explanation of their approach to preserving deceased people, which is something that is often left out of face-to-face discussions with clients for fear of causing upset. It is also intended to highlight quality differences between back of house refrigerated facilities.

How will the person who has died be physically cared for?

(where relevant, please explain your approach to first offices)

This question is intended to elicit information about physically caring for deceased people, which is something that is often left out of face-to-face discussions with clients.

At what location(s) will the person who has died be cared for?

(if locations are owned or operated by anyone other than your business, please specify)

This question is intended to highlight when the deceased person will be taken to a location other than the place that the client would visit.

What is your view on families being involved in physically caring for the person who has died?

This question provides the funeral directing business with an opportunity to highlight any service options they offer that might allow for this.

Can I come and spend time with (view) the person who has died and if so, what will that be like?

- *please set out the hours in which you can facilitate viewing of the person who has died*
- *please highlight any service options that do not include an option for viewing*
- *if you require advance notice in order to facilitate viewing, please specify*
- *please set out any other limitations to this service (number of people who can view at one time etc.)*

This question is intended to clarify the firm's approach to viewing so that a consumer can compare with other service providers.

How will any belongings of the person who has died be stored/kept?

This question allows the funeral directing business an opportunity to highlight any measures that it has put in place to ensure belongings are cared for appropriately and securely.

Section 3 – Areas of specialism

Do you offer any of the following services (please check boxes as appropriate)?

| | |
|-------------------------|--------------------------|
| <u>Direct cremation</u> | <input type="checkbox"/> |
| <u>Direct burial</u> | <input type="checkbox"/> |
| <u>Natural Burial</u> | <input type="checkbox"/> |

Do you have any specific ethnic, religious or cultural specialism?

This question provides the funeral directing business with an opportunity to showcase any specialist knowledge or experience that might be relevant to consumers from particular groups.

Can you provide support with environmentally friendly funeral options?

Yes

No

Please provide details:

This question provides the funeral directing business with an opportunity to showcase their environmentally friendly funeral options.

Can you provide me with advice on arranging a home funeral (i.e. look after the person who has died at home and make most funeral arrangements without a funeral director)?

This question is intended to highlight that this is an option and that some funeral directing businesses are able to help support home funerals.

Section 4 – Financial information

Where can I find your prices?

This question is self-explanatory.

What is the price of your lowest cost service offering that meets the requirements of the FSCSR Direct Criteria?

- The price of the lowest-cost funeral that meets the FSCSR Direct Criteria is £_____

Or

I do not offer a funeral that meets the requirements of the FSCSR Direct Criteria

What is the price of your lowest cost service offering that meets the requirements of the FSCSR Entry Criteria?

- The price of the lowest-cost funeral that meets the requirements of the FSCSR Entry Criteria is £_____

Or

- I do not offer a funeral that meets the requirements of the FSCSR Entry Criteria

Do you offer any other service packages at fixed prices?

(please either provide an outline of packages offered and the prices of these packages or indicate where this information can be accessed)

This question is intended to elicit information about other package options available so that these can be compared with the offerings of other providers.

How can I obtain an estimate price?

This question provides an opportunity for the funeral directing business to explain how the prospective client can obtain a price estimate before committing to using their services.

Will I be able to change my instructions after receiving an estimate price?

(please explain any potential cost implications of doing this, including in relation to package funeral options)

Among other things, this question provides an opportunity for the funeral directing business to make clear the extent to which they are willing to be flexible in relation to package options without significantly increasing the price.

How soon will I need to pay the bill?

(please also include details of any deposit payable)

This is important information for those who may not have sufficient funds immediately to hand (e.g. social fund applicants or spouses who no longer have immediate access to their deceased partner's bank account).

Can you help me apply for state support to help pay for the funeral?

This question provides an opportunity for the funeral directing business to explain the extent to which they are able to assist social fund applicants.

What payment options do you offer?

This question is intended to elicit information about payment options offered (e.g. interest free loans). Not all funeral directors offer these options but they can be crucially important for some consumers.

Section 5 - Ownership and services offered

Who owns this funeral business?

This question is intended to highlight when two funeral homes are actually owned by the same company. This will reduce the risk that consumers unwittingly compare the offerings of one company with itself.

Do you sell funeral plans (please name all providers)?

Answering this question will allow consumers hoping to purchase funeral plans to avoid firms that cannot offer what they need.

*Do you help people to express their funeral wishes?
(if you charge for this service, please provide the cost)*

This question provides an opportunity for the funeral directing business to set out any assistance they can provide in making plans ahead of time.

Do you offer any additional services that I might find useful (like memorials, bereavement support, legal services etc)?

It is important to note that the funeral director will have no responsibility for the services provided directly by third parties.

This question is self-explanatory.

*Do you offer a Direct Cremation service?
(please provide details of price)*

This question is intended to enable consumers to easily compare the price of direct cremation offerings.

Section 6 – Complaint handling

If I am not satisfied with the service I receive, how can I make a complaint?

This question is intended to elicit information about the funeral business' complaints procedure.

Are you regulated and/or inspected by any external body?

(please give details of any trade association membership you hold and any statutory regulator you are accountable to – e.g. the Scottish Inspectorate of Funeral Directors)

This question is intended elicit information about any additional protections a consumer can rely on if they use the services of a particular firm. It is felt that this question is particularly important until such a time that mandatory regulation is put in place.

Glossary

Direct burial

Direct burial is a service option in which the person who has died is buried without a formal funeral service or graveside service before the burial. Direct burial is usually the most affordable burial option but is typically more expensive than direct cremation.

Direct cremation

Direct cremation is a service option in which the person who has died is cremated without a funeral service beforehand. Direct cremation is usually the lowest cost option.

Disbursement

Any payment made on behalf of a client to a third party for which reimbursement (without any mark-up) is subsequently charged to the client.

First offices

The process of making a person who has died look presentable for loved ones to view. As a minimum, this will include cleaning and washing the body, dressing them and closing the eyes and mouth.

Funeral plans

A funeral plan is a contract under which a customer makes one or more payments to a provider, who subsequently arranges or pays for a funeral upon the death of the person to whom the plan relates. Providers either invest these payments in a trust fund or take out a form of insurance against the life of the customer. This enables customers to pay for a funeral in advance and safeguard against inflation.

If a significant number of funeral service providers made this information available in this format, this will improve consumer outcomes by:

- providing consumers with comparable detailed information on which to decide which service provider is right for them;
- generally raising awareness of the services offered by funeral directors by making this information available;

- highlighting important considerations to consumers who may not otherwise have been aware of them (e.g. different care options for deceased people); and
- providing third-party information aggregators (such as comparison websites) with a large body of useful information that could be presented to consumers in creative and more user-friendly format.

Question: Do you agree that the consumers would benefit if all funeral directing businesses made their answers to the FDQ publicly available (e.g. on their websites)?

Questions about the substance of the FDQ

We appreciate that the FDQ is quite lengthy, which could be off-putting to a recently bereaved consumer. However, we envisage that consumers should only need to consult the FDQ in relation to a small number of potential service providers, having already used the much simpler KIF to narrow their search.

We have now reached a point where we are uncomfortable removing any questions for risk of depriving some consumers of information that they need in order to make an informed choice of service provider.

A particular challenge in identifying a suitable set of questions has been trying to balance the need to elicit sufficient detail to enable consumers to make informed decisions with the desirability of presenting information succinctly and in an easily digestible format.

This task is made particularly challenging by the fact that much of the information we believe consumers need to know about funeral directors' service offerings are completely unfamiliar to many consumers. For example, a consumer who knows nothing about the process of embalming is unlikely to proactively seek information about a business' ability to provide the service. This does not mean that the information, once provided, will not be an important consideration for them when choosing a provider.

Question: Do you think any of the questionnaire questions set out above should be removed from the FDQ in order to make the overall questionnaire more manageable for consumers to read?

Question: Are there any additional questions you think should be added to the FDQ? (please explain your reasons for any suggestions)

In addition to refining our questions, we believe that any problems around making this information more easily accessible to consumers could be overcome by the intervention of third-party information aggregators, such as service comparison websites. For example, if a significant number of funeral directors made this information easily available (e.g. in a centralised place), we anticipate that third party information aggregators would be keen to develop online tools to help consumers compare the information that is specifically relevant to their needs.

Question: To what extent do you agree that third party aggregators would be likely to use FDQ information to develop new comparison tools?

Another challenge has been to balance the need to frame questions sufficiently tightly to elicit usefully comparable information, with a desire to allow funeral directing businesses sufficient freedom to convey information about widely varying service offerings.

Question: Do you think that any of the proposed FDQ questions have been framed in such a way as to unreasonably restrict businesses from describing their service offerings?

Question: Do you feel that any of the proposed FDQ questions have been framed in such a way that risks allowing less scrupulous funeral businesses to avoid providing the information the question has been designed to elicit?

Question: Do you have any additional comments you would like to make about this proposal

Appendices

Appendix A – The Scottish Government’s Simple Funeral Definition

(as set out in the Scottish Government’s 2019 Funeral Costs Guidance)

Scottish Government description of a simple funeral:

A low-cost and clearly-priced funeral package which includes:

- *Attending to the necessary arrangements, such as completion of necessary certification, taking instructions from the client and providing guidance on registration and legally-required procedures;*
- *Provision of the necessary staff for care of the deceased;*
- *Provision of an appropriate and robust lined coffin suitable for burial or cremation;*
- *Transportation of the deceased person from the place of death during normal working hours (normally within fifteen miles but taking into account local circumstances);*
- *Appropriate arrangements for the uplift of the deceased and care of the deceased person prior to the funeral, in appropriate facilities;*
- *Viewing of the deceased person, during normal working hours, by appointment;*
- *Provision of a hearse or other appropriate vehicle direct to the nearest crematorium or cemetery at a date and time agreed with the funeral director and clearly described to the client;*
- *The opportunity to hold a service at the cemetery or crematorium at the time of committal; and*
- *If burial is specified (where this is available locally) this may involve an additional charge.*

The Scottish Government definition specifically excludes:

- *Embalming;*
- *Provision of a limousine;*
- *Any third-party fees or disbursements payable on the client’s behalf; or*
- *Service officiant’s fee.*

Appendix B – Example of completed Key Information Form (KIF)

Please note that all answers are fictitious and are provided for illustrative purposes only.

| Key Information Form (for 'at need' customers) | |
|--|---|
| 8. Where can I find a full list of your prices and service options? | |
| Our full price list can be accessed by clicking HERE . Alternatively, you can pick up a paper copy at any of our branches. | |
| 9. What is the price of your least expensive funeral that meets the criteria set out at the foot of this form? | 10. What is the price of least expensive direct cremation/burial that meets the criteria set out at the foot of this form? |
| £ 1300.00 | £ 3000.00 |
| 11. If I change my mind after engaging you as my funeral director, will you charge me (and if so, how much)? | |
| c) We will only ever charge you for the work we have carried out. There is no penalty charge for switching to a different funeral director. For further details, please see our online price list. | |
| 12. At what location(s), and by whom, will the person who has died be cared for? (if locations are owned or operated by anyone other than your business, please specify) | |
| We care for deceased people at our mortuary facility located at [INSERT ADDRESS] but can facilitate family viewing at any of our branches if you provide advance notice. | |
| 13. How soon will I need to pay the bill? (please also include details of any deposit payable) | |
| We require payment within 8 weeks of the date of the funeral. A 10% deposit is required in advance. | |
| 14. Can you provide information about state support that may be available to help pay for the funeral? | |
| We can advise on how to apply for a Funeral Expenses Payment (England, Wales and Northern Ireland) | Yes |
| We can advise on how to apply for Funeral Expense Assistance (Scotland) | No |
| We can advise on how to apply for Bereavement Allowance | Yes |

| | |
|---|-----|
| We can advise on how to apply for Bereavement Payment | Yes |
| We can advise on how to apply for Bereavement Support Payment | Yes |
| We can advise on how to apply for Widowed Parent's Allowance | Yes |

| Entry criteria | Direct Criteria |
|---|---|
| Attending the necessary arrangements (such as completion of necessary certification, taking instructions from the client and providing guidance on registration and legally-required procedures); | Attending the necessary arrangements (such as completion of necessary certification, taking instructions from the client and providing guidance on registration and legally-required procedures); |
| Provision of the necessary staff for care of the deceased; | Provision of the necessary staff for care of the deceased; |
| Provision of an appropriate coffin suitable for burial or cremation; | Provision of an appropriate coffin suitable for burial or cremation; |
| Transportation of the deceased person from the place of death (normally within fifteen miles but taking into account local circumstances); | Transportation of the deceased person from the place of death (normally within fifteen miles but taking into account local circumstances); |
| Appropriate arrangements for the uplift of the deceased and care of the deceased person prior to the funeral, in appropriate facilities; | Appropriate arrangements for the uplift of the deceased and care of the deceased person prior to the funeral, in appropriate facilities; and |
| Viewing of the deceased person, during normal working hours, by appointment; | Transportation of the deceased to a crematorium or cemetery at a date and time agreed with the funeral director and clearly described to the client. |
| Provision of a hearse or other appropriate vehicle direct to the nearest crematorium or cemetery at a date and time agreed with the funeral director and clearly described to the client; and | |

| | |
|--|--|
| <p><i>The opportunity to hold a service at the cemetery or crematorium at the time of committal.</i></p> | |
|--|--|

Appendix C – Example of completed Funeral Director Questionnaire (FDQ)

Please note that all answers are fictitious and are provided for illustrative purposes only.

| |
|---|
| Section 1- Client support |
| <i>What is your approach to helping people to arrange funerals?</i> |
| <i>We will help you make all the arrangements and guide you through the process step-by step. We have years of experience and understand what is needed to make a dignified and personal funeral. Our team are very knowledgeable and will treat you with respect.</i> |
| <i>Who will answer the first telephone call during working hours / out of hours?</i> <ul style="list-style-type: none">- <i>please set out the hours in which you operate a telephone answering service</i>- <i>if you outsource any part of your telephone answering service, please provide details of the service provider</i> |
| <i>During the day your call would be answered by a receptionist in the service and during the evening a member of our highly trained and specialist call centre team will answer your call immediately.</i> |
| <i>Who would come to collect the person who has died, and do you offer this service out of hours?</i> |
| <i>We have a team of highly trained professionals who specialise in coming to collect people who have died and bring them into our care. They will be dressed respectfully and will arrive in a discrete black private ambulance.</i> |
| <i>Do you offer home visits?</i> <i>(please indicate any limitations to this service, for example exclusions from certain packages, additional charges or distance limitations)</i> |
| <i>We offer home visits with all of our funeral packages but if we need to travel more than 20 miles then there may be a small additional charge. We also invite you to come and make arrangements in the service.</i> |
| <i>Who will help me and how will you communicate with me during the arrangement process?</i> <i>(please set out the early steps to arranging the funeral with your business)</i> |
| <i>You will meet with a funeral arranger who will help you make all the decisions relating to the funeral. They will also meet with you to complete all the necessary paperwork. On the day of the funeral, a very experienced funeral director will lead the funeral day. You can contact us by telephone or email, or you can pop into the service anytime within office hours.</i> |

Section 2 - Care for the person who has died

Who will physically care for the person who has died?

(please give details of any training undertaken and/or qualifications held by these people)

We have a specialist team of trained professionals who will care for the person who has died. This includes mortuary technicians and specialist embalmers.

We train our staff in-house rather than putting them through external training or qualification courses.

What measures are taken to preserve/stop deterioration of the deceased?

(please give details of any refrigeration or temperature-controlled facilities you use and, where relevant, explain your approach to embalming)

We believe that embalming (chemically treating the body in order to delay deterioration) is the best and most dignified way to look after someone. We do not charge for this service and usually recommend it to our clients.

Apart from when viewing is taking place, we typically care for deceased people in our refrigerated mortuary facility until the day of the funeral.

How will the person who has died be physically cared for?

(where relevant, please explain your approach to first offices)

When the person who has died arrives, they will be washed and prepared. This typically involves shutting their eyes and ensuring their mouth is closed.

At what location(s) will the person who has died be cared for?

(if locations are owned or operated by anyone other than your business, please specify)

We have a purpose-built facility that is specially designed to look after people who have died. This has a dedicated team of specialist staff and is based a short distance from our funeral home. If you would like to visit the person who has died, then we will safely transport them to which is most convenient for you.

What is your view on families being involved in physically caring for the person who has died?

Although we would never refuse this, we believe that most families will find this very difficult and would encourage people to trust us to deliver the care that is required.

Can I come and spend time with (view) the person who has died and if so, what will that be like?

- please set out the hours in which you can facilitate viewing of the person who has died
- please highlight any service options that do not include an option for viewing
- if you require advance notice in order to facilitate viewing, please specify
- please set out any other limitations to this service (number of people who can view at one time etc.)

If you would like to come and spend time with the person who has died, then you simply need to contact us to arrange to do so. We have three very peaceful chapels of rest that you can use, and you can come as often as you would like.

The person will be prepared in their coffin and you may wish to bring some items to make the space feel more personal.

We can usually facilitate viewing between 10:00-16:30 Monday to Saturday and from 11:00-15:00 on Sunday.

Please note that viewing is not included as part of our direct cremation package. We can still facilitate viewing with this option but this will attract an additional fee.

How will any belongings of the person who has died be stored/kept?

We will keep any belongings in a locked room until you are able to collect them.

Section 3 – Areas of specialism

Do you offer any of the following services (please check boxes as appropriate)?

Direct cremation



Direct burial



Natural Burial



Do you have any specific ethnic, religious or cultural specialism?

We have supported people with a wide range of different ethnicities and religions and work closely with local Chinese and Greek communities. We respect all religions and have the knowledge and experience to do so respectfully.

Can you provide support with environmentally friendly funeral options?

Yes

No

Please provide details:

We offer a range of environmentally friendly coffins and can give advice on greener funeral options. There are also many sources of information available on-line.

Can you provide me with advice on arranging a home funeral (i.e. look after the person who has died at home and make most funeral arrangements without a funeral director)?

We do not currently support families with home funerals.

Section 4 – Financial information

Where can I find your prices?

We have a full price list available in our service and can give this to anyone who visits our service. This list includes a price for every service that we offer.

What is the price of your lowest cost service offering that meets the requirements of the FSCSR Direct Criteria?

- The price of the lowest-cost funeral that meets the FSCSR Direct Criteria is £1300.00

Or

I do not offer a funeral that meets the requirements of the FSCSR Direct Criteria

What is the price of your lowest cost service offering that meets the requirements of the FSCSR Entry Criteria?

- The price of the lowest-cost funeral that meets the requirements of the FSCSR Entry Criteria is £2500.00

Or

I do not offer a funeral that meets the requirements of the FSCSR Entry Criteria

Do you offer any other service packages at fixed prices?

(please either provide an outline of packages offered and the prices of these packages or indicate where this information can be accessed)

Yes, we have three funeral packages – traditional, basic and direct cremation. Our online price list states what is included in each package.

How can I obtain an estimate price?

Once you have decided what you would like we will give you a written estimate.

Will I be able to change my instructions after receiving an estimate price?

(please explain any potential cost implications of doing this, including in relation to package funeral options)

Yes, you can. Every time you make a decision which affects the cost of the funeral, we will reissue you with an updated estimate so that you always have an accurate idea of the funeral costs.

How soon will I need to pay the bill?

(please also include details of any deposit payable)

We will ask you for a deposit for the funeral disbursements (the third-party costs such as the crematorium or grave) and this will need to be paid before the funeral takes place.

We will send you an invoice a few days after the funeral and we ask you to pay the invoice within 14 days.

Can you help me apply for state support to help pay for the funeral?

Yes, we can. However, we cannot provide an assessment of whether you are likely to be successful in a claim for state support.

What payment options do you offer?

We will ask you for a deposit for the funeral disbursements (the third-party costs such as the crematorium or grave) and this will need to be paid before the funeral takes place.

We will send you an invoice a few days after the funeral and we ask you to pay the invoice within 14 days.

We don't currently offer any alternative payment plans.

Section 5 - Ownership and services offered

Who owns this funeral company?

This is a family owned business. It was opened by my grandfather in 1964 and is now run by me and my children.

Do you sell funeral plans (please name all providers)?

Yes, we sell Golden Charter funeral plans and can help you find the plan that is most appropriate for you.

Do you help people to express their funeral wishes?

(if you charge for this service, please provide the cost)

We will help you to write down your specific funeral wishes when you buy a pre-paid plan.

Do you offer any additional services that I might find useful (like memorials, bereavement support, legal services etc)?

It is important to note that the funeral director will have no responsibility for the services provided directly by third parties.

We have our own memorial mason on-site and can suggest a local solicitor if you need any help with probate.

***Do you offer a Direct Cremation service?
(please provide details of price)***

Yes, we do. Full details of this service are set out in our online price list.

Section 6 – Complaint handling

If I am not satisfied with the service I receive, how can I make a complaint?

We always do our best to meet the needs and expectations of our clients but recognise that things can sometimes go wrong. We hope that you feel comfortable to complain to us in the first instance.

We take all complaints very seriously and will always aim to resolve the issue as quickly as possible. In the event that you are not satisfied with the resolution of your complaint, you can complain to our trade association, the National Association of Funeral Directors by completing their [online complaint form](#).

***Are you regulated and/or inspected by any external body?
(please give details of any trade association membership you hold and any statutory regulator you are accountable to – e.g. the Scottish Inspectorate of Funeral Directors)***

As members of the National Association of Funeral Directors we are required to adhere to the requirements of the [NAFD Code of Practice](#).

Our customers also benefit from the protection of the [NAFD Resolve consumer complaint resolution scheme](#).

Glossary

Direct burial

Direct burial is a service option in which the person who has died is buried without a formal funeral service or graveside service before the burial. Direct burial is usually the most affordable burial option but is typically more expensive than direct cremation.

Direct cremation

Direct cremation is a service option in which the person who has died is cremated without a funeral service beforehand. Direct cremation is usually the lowest cost option.

Disbursement

Any payment made on behalf of a client to a third party for which reimbursement (without any mark-up) is subsequently charged to the client.

First offices

The process of making a person who has died look presentable for loved ones to view. As a minimum, this will include cleaning and washing the body, dressing them and closing the eyes and mouth.

Funeral plans

A funeral plan is a contract under which a customer makes one or more payments to a provider, who subsequently arranges or pays for a funeral upon the death of the person to whom the plan relates. Providers either invest these payments in a trust fund or take out a form of insurance against the life of the customer. This enables customers to pay for a funeral in advance and safeguard against inflation.