HOUSE OF COMMONS

Work and Pensions Committee

Oral evidence: Support for the Bereaved, HC 2023

Wednesday 19 June 2019

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Watch the meeting

Members present: Frank Field (Chair); Heidi Allen; Rosie Duffield; Ruth George; Steve McCabe; Nigel Mills; Chris Stephens; Derek Thomas.

Questions 78 - 107

Witnesses

I: David Collingwood, Director of Funerals, Co-op Group; Paul Allcock, UK Government Liaison-Executive Committee, National Society of Allied and Independent Funeral Directors (SAIF); Jeremy Field, Past President, National Association of Funeral Directors (NAFD); and Simon Cox, Head of Insight and External Affairs, Dignity.

Written evidence from witnesses:

Co-op Group (SFB0009)

Dignity (SFB0008)

National Association of Funeral Directors (SFB0016)

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Examination of witnesses

David Collingwood, Director of Funerals, Co-op Group; Paul Allcock, UK Government Liaison-Executive Committee, National Society of Allied and Independent Funeral Directors (SAIF); Jeremy Field, Past President, National Association of Funeral Directors (NAFD); and Simon Cox, Head of Insight and External Affairs, Dignity.

Q78 **Chair:** Welcome. Thank you very much for coming here. David, might you identify yourself for the sake of the record? We will go down the panel, if we may.

David Collingwood: Good morning. My name is David Collingwood. I am the Director of Funerals with Co-op Funeral Care. I am a qualified funeral director and embalmer.

Simon Cox: Hello. I am Simon Cox. I am the Head of Insight at Dignity. I previously gave evidence for Royal London at the last Committee and it is probably worth noting that I also work on the Scottish Funeral Poverty Working Group.

Jeremy Field: Good morning. My name is Jeremy Field. I am representing the National Association of Funeral Directors. I am a past president and chair of its Policy and Communications Committee and Managing Director of our family funeral business, CPJ Field.

Paul Allcock: I am Paul Allcock. I am the Government Liaison Officer for the National Society of Allied and Independent Funeral Directors. I am also a practising funeral director with my own family business in Norwich.

Q79 **Chris Stephens:** Good morning. I just want to ask a very straightforward question about this idea of a simple funeral. You may know that this Committee back in 2016 recommended to the Government that the funeral sector and the Government should get together and try to agree a definition of a simple funeral. I understand from the written evidence that there has been a significant increase in what the sector would call the number of affordable funeral options over that period. I want to come back and see whether there is a definition of a simple funeral, as the Scottish Government have obviously tried to suggest. Is that possible and is it desirable?

Paul Allcock: Essentially there has been a simple funeral in existence for many years. Historically both the NAFD and SAIF had the basis of a simple funeral within their codes of practice. I cannot speak for NAFD, but SAIF still has the criteria of the inclusion of a simple funeral within our code of practice.

I have read the Scottish Directives and I think there could even be some improvements on that. I think there is a desire to have clarity for the public at the end of the day, so that they have a real understanding of what they are buying into and what they are getting for their money. The elements of a simple funeral within the Scottish guidance are very nearly there. It is quite clear. I think it could be a little clearer still, personally.

Within SAIF there is certainly a desire for there to be a simple funeral with the basic elements that we feel should be included within that. Pricing of it is a very difficult scenario. With our organisation, as you can imagine, we have nearly 900 independent funeral directors who all will have different pricing structures. That clarity also is important if that is being offered elsewhere. From SAIF's perspective, we would be happy to talk with the other organisations with regards to creating something of this ilk. It is a shame that it has dissolved a little bit over the years, but I see no reason why that cannot be brought back together to create a simple funeral offer for the public.

Jeremy Field: A lot of what Paul says has grounds. The NAFD does not have at the moment within its code of practice a requirement for a simple funeral. The primary challenge that we found was around policing the commonality of the service provision among different funeral directors. It was found to not be acting as the tool that it could be to make a direct comparison through price, which I think was its original intention.

I think it is possible. There are a number of things that need to be overcome. As the layout was when the NAFD last had it, it did not accommodate a great deal in terms of cultural or religious variants. For example, it specifically excluded ritual washing, which would be problematic for certain religions. There is a lot of work that needs to be done to create a definition that is narrow enough to be effective but also broad enough not to exclude anyone from using it.

Then on the back of that, using the existing models that the NAFD has for policing implementation, we have standards and quality managers on the road visiting members. A similar system exists for our friends at SAIF. It is making sure that it is applied in a universal manner because what you do not want is somebody to be receiving a different service, having been quoted a different price elsewhere.

Simon Cox: Yes, I would agree that it is possible. Indeed, I have been on the Scottish Government's funeral poverty working group for the last three years, so I have contributed to shaping that, along with other colleagues in the funeral industry.

In our submission, having launched the UK's first national direct cremation service in December 2016, if I go back to when the original Committee met, the current wisdom at that time was probably that the entry point into the funeral sector or the traditional funeral was a simple funeral, ie the floor, if you like, of the funeral sector. Since then we have seen a number of low cost, more affordable solutions come into the market. The reason why I question whether it is desirable per se is that you may be reinforcing social and cultural norms to set expectations for that traditional funeral when, from the research that we have done, we can see that we are probably meeting formerly unmet consumer need.

David Collingwood: Having some understanding of common language is very important with this. We are talking about a "simple funeral" but I have been arranging funerals for 33 years and it is about families understanding the words that we use. "Simple funeral" or "third party fees", what is that? What is important about the opportunity with a simple funeral and having a common understanding among the profession is that people are able to measure like with like when they are making a purchasing decision. That has to be important at a time when you are grieving and you are struggling.

Another important thing, to Jeremy's point, is making sure that the services and the quality that you provide within that simple funeral are measured as well. In Scotland there has been some great work done towards looking at some common terms, a common roster, for want of a better phrase. Again, that has to make things clearer for people who at the best of times are grieving and suffering. The technical issues they are not that interested in.

Chair: Steve, are you happy?

Steve McCabe: That is very helpful. Thank you very much.

Q80 **Ruth George:** The Funeral Expenses Payments from the DWP for families who qualify cover the expenses such as burial and cremation fees plus up to £700 for other funeral expenses. Have any of you ever conducted a funeral at that cost, at under £700?

Chair: Can we have yes or no to start with?

Paul Allcock: I say no, not an adult funeral.

Jeremy Field: Not for a very long time.

Simon Cox: Our online low-cost funeral is routinely performing services for families to deliver low-cost funeral solutions at £995, £1,395 and £1,895. Two out of three cases would meet 100% of the costs, but in the more expensive, about 70% to 80%. In our traditional funeral, however, it would only meet about 25% of the cost of a simple funeral.

Q81 **Chair:** Is that a yes or no?

Simon Cox: It is a yes.

David Collingwood: We may well have done, back in 2003.

Q82 **Ruth George:** Yes. I was going to say that the amount has not risen since 2003. You are saying, David, that it was appropriate at that time, but that it is not any longer in most cases. It is obviously a very difficult situation to be discussing with families, not just about what sort of funeral that they would like but also about the cost as well. Do you have to ask them when they approach you whether they are eligible for the funeral payment and what their own income situation is like? Are you able to have such discussions based on cost and affordability as well as what families are wanting? I imagine that cannot be an easy thing to do. Do you want to just start us off?

David Collingwood: If I could reply to that, what is important within a funeral arrangement is that you listen to the wishes and the wants of the family. That is very important. But in saying that, you should also ensure that the family understand what the costs of those wishes are and what the eventual cost will be because it cannot be professional if we are leading a family down a road without certain milestones where we are pausing and talking about the cost of the funeral.

Everyone has their right to a decent and respectful funeral, in my view. When the DWP first introduced the £700 towards the funeral director's charges, that went a real way towards helping some families who were struggling financially to have that decent and respectful funeral. I do not believe it does now.

For us, it is important that we talk to families in the funeral arrangement so that they understand and we will always ask the family about their ability to pay. We ask that to make sure that a family, through their emotional commitment and their love for that person, do not end up in masses of debt where that can be avoided through looking at choices and through looking at other alternatives or other ways to help fund that funeral through the DWP.

Ruth George: Do any of you have anything to add to that?

Jeremy Field: It is also important to note that the interpretation of what is included in the £700 has changed since 2003. For example, the fee for somebody to lead the service—I think the industry expression would be officiant—now comes out of that £700, where it did not previously.

In addition to your supplementary question, which was about talking to people about the funds, every funeral arrangement from an NAFD point of view includes finishing with a written estimate of the costs of the funeral. It is essential that a conversation about payment takes place at that particular point of the arrangement meeting and that would typically surface issues around affordability.

Paul Allcock: I have to contradict slightly things that have been said. If I can just go back to your £700 comment, that that was an appropriate figure back in 2003. I opened my own family business—I had previously worked for a family business that was taken over—in 2000. I offered a simple funeral at £1,250 at that time and that was considerably less than the average cost across that market at that point in time. Even in 2003 with £700, families were still short £550, for example.

Over the years, that simple funeral within my company—I can only quote from my company's perspective—is now £1,650. I am quite happy to put that out there. You are talking about a £950 deficit from the word go.

Certainly there is a large element that is missing, in a sense, to help support families at that time.

I arrange funerals on a weekly basis still and in general terms, families make it known to us that they are on benefits. Very often they will come in and it will be an early discussion. If they are concerned about the cost, it is something that the families would tend to raise at a very early point in the discussion. However, that does not say that we should not raise it ourselves, of course. As Jeremy has alluded to, quite rightly, any funeral director should be having that discussion with the families, explaining the costs as we go through the arrangements as to what is incorporated and the expectations.

There are funeral directors who often ask for a payment in advance as well. All these elements create difficulty for families at that time. Therefore it is very important that we are aware to help them and guide them to the support. There are various areas of support available to them.

Q83 **Ruth George:** Where a payment is asked for in advance—and presumably that cannot be met upfront by the DWP—then that comes down to affordability for families. Is that common practice, to ask for a payment in advance?

Paul Allcock: I would say it is not an uncommon practice. My company does not, but I know many of our members do ask for a payment in advance to cover the likes of the disbursements. When I say "the disbursements", your crematorium or your cemetery fees or it could be a figure that they have put towards that specifically.

The main reason that came about was, to be honest, because they were being left with a debt that they were covering for another company. As funeral directors, we act as agents. We pay all the fees on behalf of the family and invoice the family for everything. We are taking on the debt of the crematorium and the cemetery if we are not then paid for the funeral. That was the main reason, I think, that brought in that idea of taking a payment in advance, and I can understand it.

Q84 **Chair:** We are going to come on to that a little later. I just wonder, how many families are unable to pay your bill once the funeral has taken place? What sort of percentage? Can I just go down the line?

Paul Allcock: In my own company's situation I would say it is a very small percentage, but I can only speak for my own company because all independent companies are different.

Jeremy Field: I am here representing the National Association of Funeral Directors. I do not have the statistic across the whole of the profession. For my own business, again, if it is any more than 1.5% I will be extremely surprised.

Simon Cox: Again, I do not have the exact statistic. I am happy to find that information out and provide it to the Committee, but I understand it is a very small percentage.

David Collingwood: It is not a figure I have to hand, but I would say that sitting with a family, if a family were struggling to pay those third party fees, we would look towards opportunities to investigate how they could. For example, a lot of families may be cash poor but asset rich. There may well be a house or an estate where they cannot immediately realise those funds. That is the importance and the quality of that conversation at the time of the arrangement. If we have cases where a family is struggling to pay the third party fee upfront but we know that there are assets—there may well be an insurance policy, there may well be something—then so long as we have proof of that, we continue with the funeral.

Q85 **Chair:** What sanctions do you take against families who cannot pay? We had evidence in our last inquiry that people who had had relatives cremated could not actually gain the ashes until they had paid. Do you have examples of that?

David Collingwood: We would not and could not, in my view, prevent the family from completing the funeral in that way by withholding ashes. That, for me, is just something that would—

Q86 **Chair:** There would be no sanctions like that? Simon.

Simon Cox: No.

Jeremy Field: The NAFD came out very strongly in the hearing to say that it was a completely abhorrent practice.

Paul Allcock: Likewise.

Chair: Very good.

Q87 **Heidi Allen:** I was just going to say that I had recently seen a lady on benefits having to crowdfund for £4,000 for funeral costs that she had not been aware of. She had not been aware of the amount. Is that something that you are seeing more of, that people are having to crowdfund for funeral expenses?

Paul Allcock: First, they should be aware of the amounts in advance of signing any documentation and accepting instructions being given to the funeral director. All our members are obliged to give a written estimate at the time and follow that up with a confirmatory estimate prior to invoice, subsequent to the funeral. They should be aware. I have to say that I have had probably a handful of clients through my door who have crowdfunded to support their funds.

Simon Cox: I would say 98.5% of our customers, when we get feedback, say that the estimate they got was exactly what they expected to receive. I would be surprised if people were surprised by funeral costs because they are walked through that whole process.

Jeremy Field: I just want to emphasise that, yes, I have seen the crowdfund thing and it is not necessarily a great solution, but it points to this issue about eligibility for the Social Fund, which I think we are going to come on to later.

David Collingwood: Yes, we have heard of crowdfunding, but the important part about this as well is some people will want the funeral farewell that they want, that they have in mind, because it fits with their lifestyle and their life. They will look at how they can pay for that and crowdfunding is just another opportunity for them to consider that and look at how they can pay for that particular style of funeral.

Q88 **Heidi Allen:** You started to touch a little bit on this issue of estimate first so there is no surprise afterwards. For people who are struggling for money and are hoping to have access to the £700 additional fund from the DWP, how does that work? How do people find the money? The DWP pay when they have had the invoice, don't they? Just talk us through that cash flow and how that works. Would it be possible or would it be a good idea for funeral directors to invoice the DWP directly, for example? Paul, do you want to start?

Paul Allcock: It is going to vary across the funeral directors across the country. We certainly do get requests from DWP to send invoices directly, electronically, so that they have direct evidence of it currently.

Q89 **Heidi Allen:** The DWP ask for that?

Paul Allcock: Yes.

Q90 **Heidi Allen:** Is that routinely?

Paul Allcock: It is fairly routine, yes. We would send the invoice in the first instance to the family, but if they then go through the process of making a claim, once the DWP have received that—there was discussion some years ago with the DWP regarding whether an estimate would be acceptable for them to then make a judgment on the payments because the essential elements are going to be the same from the point of the estimate: cemetery fees, your doctor and so on. Those are going to be incorporated within any estimate that we would issue anyway. That would be the very earliest point that we would have those costs for the essential elements that are going to be payable from the Social Fund available to forward on to you. Now, if you would accept that as criteria to be able to make a judgment from at a very early stage, I would certainly welcome that as a positive.

Q91 **Heidi Allen:** It is that proactive estimate versus the DWP paying retrospectively and whether people can afford to pay it for themselves in the meantime?

Paul Allcock: Absolutely. The funeral may be two, three, even up to four weeks later, but if you arrange a funeral in the early stages you are receiving the equivalent of the costs that are going to be incorporated. There could be some anomalies, such as delays in invoices that we receive. Suddenly there might be a strange cost that we are unaware of that has been added from a cemetery or whatever, but that is a real rarity.

Q92 **Heidi Allen:** In general terms, you could see that being a useful approach perhaps?

Paul Allcock: Personally I could, yes.

Simon Cox: We worked with or approached DWP about 18 months ago to see whether it was possible to initiate something like that. We were prepared to run the pilot. We took it so far and DWP said to us, "We think this is something that we could run with and we are not going to run a pilot". When our evidence was published I had a call from DWP officials to say, "You know that conversation we had to say that we were looking to do that? Well, we are doing that". I think they were surprised that we were still resting on the final invoice, which we issue seven days afterwards. Recently we have heard—within the last week—that they had confirmed that is the case.

That being the case, I think that materially changes the timing of when an application for the Social Fund could be made. As Paul has just explained, at the point of making the arrangement, as long as it is a contract, I think DWP will accept that as the invoice.

Q93 **Heidi Allen:** This is new then. This is a new phenomenon.

Simon Cox: From our perspective, yes, and the reason why DWP officials called me was that they were surprised we had not acted on that verbal conversation. Obviously we would need to see something formal in writing in order to train 830 locations and call centres to explain to people, "This is the process".

I was discussing with the panel members prior to this that if that is the case, then materially the sector could maybe work with DWP to say, "If you take the application, what is to stop you then, as a whole, sending electronic invoices at that point?" If that is two, three or four weeks ahead of the funeral, then there is a good chance that many in that circumstance may get a decision about eligibility and how much they are going to get before the funeral has taken place. If the answer is either that they do not have anything or that the award is a lot smaller than they expected, then possibly they could even restructure and reshape the funeral that they were looking to have.

David Collingwood: Previous to the news that we heard around the DWP accepting the estimate for consideration, knowing that the final invoice was the only point at which they started to consider someone's application meant that families who were arranging a funeral were effectively getting into considerable debt with no guarantee that they would receive anything from the DWP. That cannot be right.

What is positive is the changes that DWP made last year, the fact that they are looking at process and accepting the estimate now to consider, but that still means a delay. They are talking in some cases of that application not being processed for four or five weeks and in reality the funeral director is having to wait that length of time before they can commit to that funeral.

Q94 **Heidi Allen:** The process is good, but the turnaround needs to be quicker.

David Collingwood: Practically we can look at this from the client's point of view and say, "This is great, this is a step forward" but surely within just three or four days that application can be properly considered and properly vetted. We can do it now online with credit, with anything. Surely they can get their house in order to look after the bereaved—

Q95 **Heidi Allen:** This is the DWP we are talking about.

David Collingwood: Absolutely. Give the DWP that challenge to say, "No, this must be a quicker process". It cannot fall into the normal route. It needs to be a quick process, back to the claimant very quickly so that they can continue with their funeral without an undue length of time between death and the funeral. Just think about how a family are having to—

Heidi Allen: Yes. The last thing they want to do is chase the paperwork.

Q96 **Chair:** They need to know, don't they, from DWP that they will accept the application as proper and that the person putting it in will be eligible?

David Collingwood: Even if it is an indication that the application will be progressed rather than the amount that would be given up, that helps a family so much.

Q97 **Chair:** People find that they think they are going to get the grant and then they do not get it.

Jeremy Field: If I might, there is another challenge around that, which is the variance in what people will receive. Their choice of cemetery can lead to a different outcome. If they are choosing one where the whole of their family is already buried or many of their family members are already buried but they are out of area for that cemetery, then it might be up to three times the fees to be buried in that cemetery. Unbeknown to the funeral director—or maybe known to the funeral director—there might be a cemetery just down the road that they could have used for a third of the cost. You have to have that knowledge within your own team to be able to talk knowledgeably to that family as they put that claim in.

Our members would certainly welcome the opportunity to invoice DWP direct. That would be a positive step. I think the issue around the deposit is a little bit of a misnomer. It has personally always been of concern to me where people raise those funds from if they are unable to pay for a funeral in the first place. No one wants to see any more people in the hands of payday lenders or even less legitimate borrowing sources than that. We need absolutely to get to a point where people can understand as early as possible what they are going to receive.

Chair: On that point about deposits, can I bring Derek in?

Q98 **Derek Thomas:** Thank you very much. The kind of people who need this are going to be people who do not have a lot of means. How are they in a position to find that kind of money at a time that is really stressful and difficult in their lives? From experience I have had with lots of families, the cost of their funeral is the least of their concerns. Even if they see the price and everything else, it is just something they will address later. How do we get to a situation where we are asking them for money upfront, which it probably is not in their means to give?

As you answer that, are there schemes or ideas that are being considered about how people might even put a small sum away over a longer period of time, which is a safe investment, to cover these kinds of costs? Some of the adverts you see on TV look like a company is going to sit on your cash for a long time and it seems to be designed for people who have means. I do not know if you want to give a thought to those two challenges.

David Collingwood: It is quite an interesting question. I think it goes back to my other point. We always talk about the cost of the funeral. With every family that we look after, we will always request the third party fees, the crematorium or cemetery fees, upfront. But where that is not immediately available, then we will look towards other things. Is there an asset and proof of an asset? Where there is not, an opportunity with the DWP is that early indication of that being covered. That early indication from the DWP would really help.

The second point, just in terms of understanding those people who are thinking about the funeral and thinking about something that none of us will avoid—we will all have to deal with this—looking at the funeral planning market from the client’s point of view, it is hugely complex at the moment. There is a lot of confusion around what is a funeral plan, what is an over-50s plan and what is covered in a funeral plan because sometimes there are capped third party fees and sometimes there are no third party fees covered. There is a lot of confusion out there even for families who are able to research without thinking about their own funeral or the funeral of their loved one before it actually happens.

More clarity in terms of how people can plan ahead and look at funerals would be really useful regrding what could be covered. Potentially we will see some opportunity for that clarity to come out and for some safety as well. Where is my money going to go? How will it be protected? We now have funeral plans where people are able to pay over 25 years. For a very small amount per month, the cost of their funeral will be covered. After just two years, we have the Co-op commitment that kicks in, which means that providing they have been paying for two years, then if they do pass away there is nothing extra to pay for the funeral and we conduct the funeral for that agreed fee.

Q99 **Derek Thomas:** Personal insurance?

David Collingwood: Yes, it is that insurance.

Q100 **Chair:** Do you have an age barrier to that policy?

David Collingwood: In terms of taking out that plan the age barrier is 80 years, just because of that commitment, but funeral plans can be taken anything up to that 80-year period.

Q101 **Derek Thomas:** Is everyone entitled—I think I know the answer to this—to this support from DWP or is it quite tightly means-tested? Even if you are not seen by the Department as needing support for funerals, it still can be a significant expense and lots of people are already living hand to mouth, literally spending the cash as they have it. It is not just about how flexible or how rapid the DWP can be; there is a broader question about other families who would not qualify for that, but still might face hardship when it comes to burying a loved one. Is that fair?

Simon Cox: Certainly from the conversations that we had yesterday with a Minister, there was an acceptance that the link with Universal Credit is probably complicating things further. They were looking at how they could disaggregate that. I am not sure whether a solution has been found with that, but I commissioned work from Bath University on the process and experience of applying to the Social Fund that set out the issues about complexity, time, value and so on.

Again, the Scottish Government, having looked at that, have tried to make that a little bit more simplistic, That has had the consequence of making it available to about 40% more people and costing the Scottish Government an extra £2 million. If there is no room for additional funds from DWP that is probably not possible, but certainly the complexities that sit around the application process and having to be on qualifying benefits mean that it is not a straightforward exercise. If you look at the number of applications versus the number of awards, there are still quite a lot of people who are having to go through that long, painful process of waiting to see whether they are going to be accepted or not. That is an issue.

Again, from the perspective of funeral plans, it is probably the best way in terms of the funeral director taking on some of the risk and preplanning in advance. We have campaigned with Fairer Finance to regulate the sector because there are some untoward practices going on in the sector, but once that sector is regulated I think that will be a clean market. However, having said that, in Scotland they are talking about incentivised savings schemes that also acknowledge existing funeral payment vehicles. There are a lot of interesting thoughts going on.

Q102 **Derek Thomas:** Jeremy, before you come in—I will be quick—the Government are supposedly producing a Green Paper on social care. You might think, "What does that have to do with us?" If they go down the route of an insurance, where all contribute to insurance and social care, would you want to have a conversation about whether that should include proper covering of funeral costs? Is there any reason why that should not be considered?

Jeremy Field: I think you would absolutely want to. Everything that this is around is around social care. There are savings schemes and savings arrangements that would help people in a non-binding way to put money aside. We know from some of the research that, for example, the Yorkshire Building Society has done, about the amount of money that people are able or even willing to save for everyday life crises, be it a leak or a broken washing machine. It just is not there and to make an allowance for funeral costs is difficult. Yes, an element of compulsion would probably be helpful but, as I say, in a way that perhaps does not bind you to one business or another.

Other funeral-based solutions—I think that was one of the expressions we have used so far—are potentially around separating the ritual and ceremony from the disposal of the deceased person. I think it would be fair to say that as a sector we have some concerns, although not a great deal of research on it yet, as to what the social care consequences are of denying people the opportunity, through a cost-based decision alone, to properly remember, reflect and grieve. What I do know from conversations with Cruse Bereavement Care is that the waiting time to get an appointment to speak with one of their counsellors is going up and up and up. Ten weeks often is the case because there is nowhere else for the health service to refer people who have issues surrounding grief for help and support.

Paul Allcock: I think it is a mindset for the public, life management, if you like, having an awareness and an understanding that ultimately there is going to be a cost element when we leave this world. I think that is something that the Government have to recognise as well, that people are very poor at preparing for death in their own finances, but also beyond that. If there was a vehicle within Government that could support and aid that, then wonderful. We would certainly welcome that with very open arms, but it is to a degree about people's understanding and being prepared.

It is the wrong subject that people still do not want to talk about, sadly, and ultimately it is the one thing, along with taxes, that is happening to us all. It is just a mindset, being prepared and putting money aside for that rainy day that is coming to all of us at some stage. It is difficult to get people into that mindset because it is the one thing that none of us want to have to deal with, of course.

Q103 **Rosie Duffield:** Do you think that there is enough awareness of low-cost funeral options and what are the roles of Government, consumer groups and the industry in general of raising awareness of affordable options?

Simon Cox: I do not think there is sufficient awareness of low-cost solutions. We are literally this week putting into the field a very large study, 10,000 bereaved families, to look at awareness of the various different low-cost solutions that are available. That includes public health funerals, Social Fund, DIY funerals, natural burials, direct cremation and even donating a body to medical science. It is to try to understand awareness and preparedness to accept and quantify the interest in low-cost and alternative funerals, even answering the question that I have heard so many times in research, "All I want is a no-fuss funeral". A no-fuss funeral to one person might be a direct cremation; to another person it might be a traditional funeral. To be able to segment and understand what that means and the understanding across those areas I think is important.

We have also conducted some in-depth research among customers that have used our low-cost online funeral, Simplicity, asking them about their process and experience. They are all saying that they absolutely understood what they were getting, it was a godsend to them and it was exactly what they were looking for. If I was to dumb it down and super-distil it, they group into people who said they do not want, do not need or cannot afford a funeral. The one slight concerning element in there for me was that some people were saying, "It was exactly what I wanted" or, "It was exactly what Mum wanted, but what will people think of me?" Because those low-cost options have not yet been normalised within society, people may be reticent to consider using them because of that. It is something that we want to explore.

Going back to the point that Jeremy made about the potential use of low-cost solutions and impact on grief, when we launched our direct cremation service in December 2016, one of the bereavement groups came to us and said, "We are concerned about the potential impact that might have on people's ability to grieve". We worked with John Birrell at Bath University and Utrecht University and we are funding a two and a half year study to look at the different elements of a cremation funeral and its potential impact on grief. That is due to report out in January 2020.

David Collingwood: In answer to the question, no, I do not think there is enough understanding of the alternatives and the choices that are available. I think this is key. People do not research beforehand because they are not expecting a death.

What is very important is the visibility that we are able to give at the time of the arrangement of the options that are open to a family. That is very important. Every family that we see, we take them all of our options, from our very simple cremation without ceremony service—that has no service around the body but a cremation and then potentially a service around the ashes if the family want that afterwards—through to the simple funeral, through to the choices funeral. Every family that we sit with and look after are given those choices.

We also try to make an indication of pricing available now online to give people an idea of not just what our charges would be, but of what the third party fees for that particular local area are likely to be as well, just to try to give people some reassurance.

There is more that we could do probably collectively to start to talk about these things that none of us can avoid. It is very interesting. Previously we talked about planning for a funeral and making provision or a monthly fee, and about it being part of what we do as a society, paying a little bit every month towards the cost of a funeral. It is not without precedent. In Holland and Belgium, over 80% of the funerals are prearranged or prepaid in some way. Culturally, not very far from where we are, that is the norm and that is accepted.

Rosie Duffield: Does anyone else want to comment?

Jeremy Field: I think we have made more progress than perhaps we have given ourselves credit for. I think we are being a little bit hair-shirted about it. We are getting closer to 50% of funeral directors having their prices online, for example. You see the growing interest in the Dying Matters coalition and Dying Awareness Week and events are being run around that. The slightly unfortunately named "death café" movement has had traction and progress. Despite perhaps our slightly British fear that if we talk about it too much we might make it happen, we are growing some of these conversations.

One of the challenges we face is the fragmented audience, if you like, for the touchpoints that people encounter on the way through, be that the hospice movement, be it the NHS, be it local authorities or funeral directors. Funeral directors, as an unregulated market with no ongoing requirement for CPD, can be quite a challenge to communicate with. We do what we can with our journals and other channels to try to drive that awareness, but it is a challenge to reach people. Yes, those are probably the main points I wanted to make.

Q104 **Rosie Duffield:** Thank you. Sorry, can I just say on that point, because you were mentioning the death cafés, my local hospice group recently had a whole day called "The Big Conversation". I was dreading it. I thought of the stigma—we do not talk about these things—but it was fantastic. It was really open.

Jeremy Field: That was the theme for Dying Matters this year.

Q105 **Rosie Duffield:** Is that the kind of thing you would get involved in?

Jeremy Field: Absolutely. It is really positive. There are great examples, as David has referred to, in other countries. We are not the only country of our sort that is struggling with this. I have seen programmes in North

America, I have seen programmes in Australia, New Zealand and more parts of the world about trying to drive this conversation. Even the Church of England has their GraveTalk bit. They are moving towards trying to create this conversation. As I say, perhaps sometimes we should give ourselves a little bit more credit.

Paul Allcock: Within SAIF, many of our members now also open up their doors and have open days. Stepping across a funeral director's threshold is usually something you are doing at the most difficult time in your life. With this, you are able to do that on an open day where you are able to ask all the questions. There are members having stands at country shows and things, just to give people the opportunity to ask in a different environment and to talk about the elements.

Going back to your original question about the low-cost funeral options and the clarity, the wording of them is important as well. We talk about a "low-cost funeral" when it is actually a direct cremation. The term "funeral" indicates that there is going to be a ceremony of some variety or a service, whereas of course a direct cremation is, in its literal term—I do not like using this term—a disposal service of the deceased with ultimately very limited, if any, care of the deceased, and with the body taken directly to the crematorium without any service at all. Now, people are not necessarily aware of that.

Of course the next step, a simple funeral, is a completely different element where you would have a service incorporated, there would be the full care of the deceased and so on through the whole process. It is important that the public are aware of those elements. It does concern me greatly that people are being led or are, from a cost perspective, feeling that they have to go down the route of the cheapest element, which is a direct cremation, which certainly may not be what they are wanting. I accept that there are people for whom that is appropriate, do not get me wrong, but there are a number certainly that I have evidenced who ultimately, when they are beyond the process, have real regrets about what they have done.

Jeremy Field: I do think we have to make this ongoing point, that while industry—and to a certain extent other bodies—can make progress on this, what we are looking at here is a societal change idea. It is about driving consumer behaviour. This is something that has been picked up in other quarters, which is that all rationality goes out of the window the moment somebody tells you somebody is dead. We are bad at using those words anyway. I would probably say something like "passed on", "passed" or whatever. We cannot even say, "That person has died". Rationality goes out the window. What do you do? You ring someone who you perceive to be a subject matter expert. Is your natural thought process, "What I should do at this juncture is ring at least three other providers just to make sure that I am getting good value against it"? There has to be an element to the education piece that asks consumers to behave in a more responsible way as well as increasing the level of transparency that the industry is providing.

Paul Allcock: This comes back to public awareness in the first instance, of course, and our being totally transparent about what is on offer and what is on the table for people.

Chair: Let us follow that up with Chris, if we may.

Q106 **Chris Stephens:** David, I might start with you. Taking stock of what you have said, these are consumers who are grieving, they are suffering and so the information that is provided has to be very clear in terms of services and what they include. The Scottish Government have obviously published advice to funeral directors describing services and what they should include. Should that now be rolled out across the United Kingdom? Should the UK Government pick that up and make it so that everyone in the UK has the same advice?

David Collingwood: There are a lot of fantastic things that have happened in Scotland with regard to their focus on funerals and the work that has been done, especially the drive towards clarity and transparency. There is a lot that we can learn and we can adopt from that. There is very little difference between a death in England and a death in Scotland, other than the fact that it is in those two different countries. They are very similar culturally and very similar in terms of their needs. With the work that is already done, there is a fantastic opportunity to look at that as a basis. We cover England, Scotland, Wales and Northern Ireland with our businesses and we know the needs of those areas, but as I say, there is a great opportunity, I believe, to adopt a lot of the work that has already taken place in Scotland.

Q107 **Chris Stephens:** Thanks, David. I know you were involved, Simon.

Simon Cox: Yes, absolutely, and obviously a great deal of work has been conducted there for burial authorities, cremation authorities, crematoria operators and funeral directors. What is important for us from work that I was doing last year looking at quality and standards in the funeral sector, is that consumers assume and expect minimum standards. While the Scottish Government funeral costs guidance is a guidance, it is not legally binding and obviously we are waiting to see what the Minister's report will find from the Inspector of Funeral Directors' work. Certainly our experience is that the quality and the standards vary enormously.

While I would agree with everything that the panel has said in terms of transparency about costs, I would agree with the figures that Jeremy quoted and certainly we committed to DWP to put our prices online by January 2019, which we have done, but there is not the same transparency about standards. You can have two funeral directors side by side with very different standards and very different operating models. Yes, we would like to see something along those lines taken forward across the rest of the UK.

Jeremy Field: I wanted to pick up on what Simon was saying to the question earlier about the lady who was crowdfunding. The immediate question would always be, "Did they choose a member of the NAFD or a member of SAIF to conduct that funeral?" because there is a whole load of transparency issues around that that should have been addressed. A lot of work and time has been invested in Scotland—even though my accent is wrong, I have played a small part in that as well along the way—and they have put a lot of energy into getting to a good place.

My concern at the moment is that we now seem to be getting to a situation where your experience is going to be different according to your geography, but within the whole of the UK. There are instances where you are going to get treated differently depending on which side of Hadrian's Wall you live and if someone dies in Scotland or dies in England. Bereavement is a moment where you need clarity and good advice and where that sort of thing—"Well, it might be this system if you are here, but it might be that system if you are there"—is quite worrying. Anything that can be used to try to create a homogenous system that everyone can readily understand would be a good thing.

Paul Allcock: Certainly transparency has improved dramatically. Within SAIF we had a scheme where we put out to our members that putting prices online was the recommended model and the vast majority of our membership have now done so, thankfully. That is a real positive in itself.

As far as the Scottish guidelines are concerned, I have no issues with advice being given to funeral directors and the public in how to organise things. The problem at the moment is that not all funeral directors are members of the trade associations and subsequently even members of our association do not have to do as we say, in essence. We can kick them out, but then they can still practice, sadly.

Ultimately there needs to be something to prevent somebody starting up on the street without any training, without any knowledge of the profession, just opening an office and saying, "I am a funeral director". That is another area of transparency. The people on the street would not have any idea of the standards or the quality of one against the other without going through the door and personally experiencing the reception and the quality of the service and personal care that they receive.

I think that if it is an element, it has to cover absolutely everybody because otherwise it is pointless. I would like to see every funeral director be obliged to be a member of one of our two associations at the very least. I think that would be a step forward, certainly, so that at least there is some governance and some control over them and some guidance and training for them as well. At the moment those that do not come on board can literally do their own thing. That is a real issue.

How do people find the cheapest funeral available to them? I think it needs to be more what is appropriate to them, because the cheapest funeral that is available to them is not necessarily the right funeral for them as a family and their needs. Again, it is important that, as funeral directors, we make that totally clear to people both in advance and at the time of need.

I see too many single headlines with a price against it, a single advert with a one-line message and a price, which does not give any detail or content of what is incorporated and what is included within that price. The same goes for funeral plans and so on as well. The headline price that someone might pick off needs to have much more description and understanding. It is getting that message out to people, which is a real challenge, to look into it in greater depth. That comes back to being prepared to ask the questions well in advance of the time of need and get out and find out for yourselves.

Jeremy Field: Can I just make a point that I think others have slightly made, just to emphasise it? That is the sheer volume of work that the funeral director does that is out of public eye. I was struck when I walked into a local takeaway restaurant recently that I do not do due diligence over the kitchen where they are preparing my food before they serve it to me, but I do pay attention if the food standard rating on the door is any less than about a four.

We do not have a system for doing that at the moment—perhaps it is far too cold a system—but there is a huge amount of work to move transparency away from simply the important issue of cost and towards value as well. I would say that most people observing the sector from within would say that the worst way to choose between two funeral directors is price. Consumers are simply not aware of what they might compromise as a result of making that decision based on price alone.

Simon Cox: I was just going to reinforce Jeremy's point from research we did with consumers, where 90% of consumers expected the funeral sector to be regulated and were appalled when they found that it was not. When we pressed them on what they would expect to see, it was exactly that example of a food hygiene rating system or some kind of scorecard. You would not expect to go into the back of the kitchen before you had a meal. Similarly, you would not expect to have to go to look at the back of house of a funeral director to see where Mum is being looked after.

David Collingwood: Just about that point, people would not expect to look in the back of house. People just assume that things are happening. They assume that we are regulated. They assume those things. What is very important, because that is a differentiator for somebody, is making sure that there are those standards at back of house that guarantee that level of quality and that there is a minimum standard. At the moment there is not.

Chair: Thank you very much.