



The Refinery, 13 Radnor Walk, Chelsea, London, SW3 4BP
020 3291 3426 (24 hours), funerals@poetic-endings.com
www.poetic-endings.com

Mr Lewis Shand-Smith, Independent Chair
Funeral Service Consumer Standards Review (FSCSR)
via FSCSR Secretariat, National Association of Funeral Directors (NAFD)

Thursday, 29 August 2019

Dear Mr Shand-Smith,

Re: Call to non-trade association affiliated funeral directors to share their views

I write to you in your capacity as the chair of the Funeral Service Consumer Standards Review (FSCSR) to express my concerns regarding your post titled 'Call to non-trade association affiliated funeral directors to share their views'.

In the post, you state:

"If you are a member of SAIF or NAFD, then they have a seat at the table to represent your views – but we really want to make sure that non-trade association affiliated funeral directors also have the opportunity to express their thoughts."

Your post is dated Thursday 22nd August 2019. The deadline for submissions is listed as Friday 30th August 2019. This gives non-trade association affiliated funeral directors eight days to contemplate, compose and submit their views on issues which are likely to have serious implications for the future of the funeral industry and the experience of bereaved people. This timescale also clashes with the late August bank holiday weekend, reducing the likelihood that anyone will respond.

In addition, the FSCSR is not a widely known or recognised project within the funeral industry. The associated Twitter account (which I understand is run by Morgan Harris, Policy and Legislation Manager at the NAFD) had 71 followers as of Sunday 25th August 2019. Most followers seem to be people who are already involved with the FSCSR project or are employed by Co-operative Funeralcare.



Funeral Service Consumer Standards Review
@FSCSRReview



A message to non-trade association affiliated funeral directors from our chair, @shandsmith. Please share your views with @FSCSRReview:
fcsr.co.uk/2019/08/22/cal...

1:36 PM · Aug 22, 2019 · [Twitter Web App](#)

3 Retweets 6 Likes

The tweet shown here appeared on Thursday August 22nd 2019 asking for non-trade association affiliated funeral directors to share their views. As of Sunday 25th August 2019, this had been re-tweeted three times (by you, the NAFD and Catherine Betley, an associate of SAIF) and liked six



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times (by you, NAFD President, NAFD CEO, the NAFD's Morgan Harris, first funerals and the Cremation Society of Great Britain).

It is therefore highly unlikely that your post will have reached many, if any, non-trade association affiliated funeral directors.

It is my belief that the FSCSR has not made appropriate efforts to engage with non-trade association affiliated funeral directors. **It therefore cannot be claimed by the FSCSR that non-trade association affiliated funeral directors have:**

1. Failed to express a view on the topics you've raised
2. Failed to co-operate with your project.

However, as a non-trade association affiliated funeral director who did see your post, I would like to share my views on the future of the funeral industry. Although I cannot speak on behalf of other non-trade association affiliated funeral directors, I am the owner of a progressive funeral firm in London and believe that my views may be representative of other progressive funeral firms, who are not affiliated with existing trade associations, by choice.

In the last decade, new operators, including myself, have set up progressive funeral firms, funeral services (a) created around the needs of client, (b) completely transparent about ownership, services, pricing and procedure and (c) based on principles of creativity, sensitivity, flexibility and emotional intelligence.

There are now many progressive funeral firms all over the UK, voluntarily prioritising high standards and transparency of service, cost and ownership. It is these progressive funeral firms who have done so much to raise consumer expectations of funerals. These progressive funeral firms are mostly not affiliated with the NAFD or SAIF.

The current lack of regulation has allowed a small number of dubious and questionable operators to set up funeral firms. However, these are in the minority, and it's important to distinguish the progressive funeral firms from the small minority of operators who have not displayed a commitment to high standards and transparency. We cannot allow these 'rogue operators' to be considered the same as progressive funeral firms, simply because they are not affiliated with a trade association. Dubious and questionable operators also belong to trade associations.

It may interest you to know that I considered applying for membership of the NAFD and SAIF and decided not to pursue my application. I would like to share some of my concerns with you.

I believe that the NAFD and SAIF's inability to sanction their own members has contributed to creating a situation where the UK funeral industry is now being investigated by the Competition and Markets Authority. I believe that the actions of the three largest NAFD affiliated funeral firms have brought the entire industry into disrepute. Two of these funeral firms (Co-operative Funeralcare and Dignity PLC) are exceedingly well represented on the Steering Committee of the FSCSR:



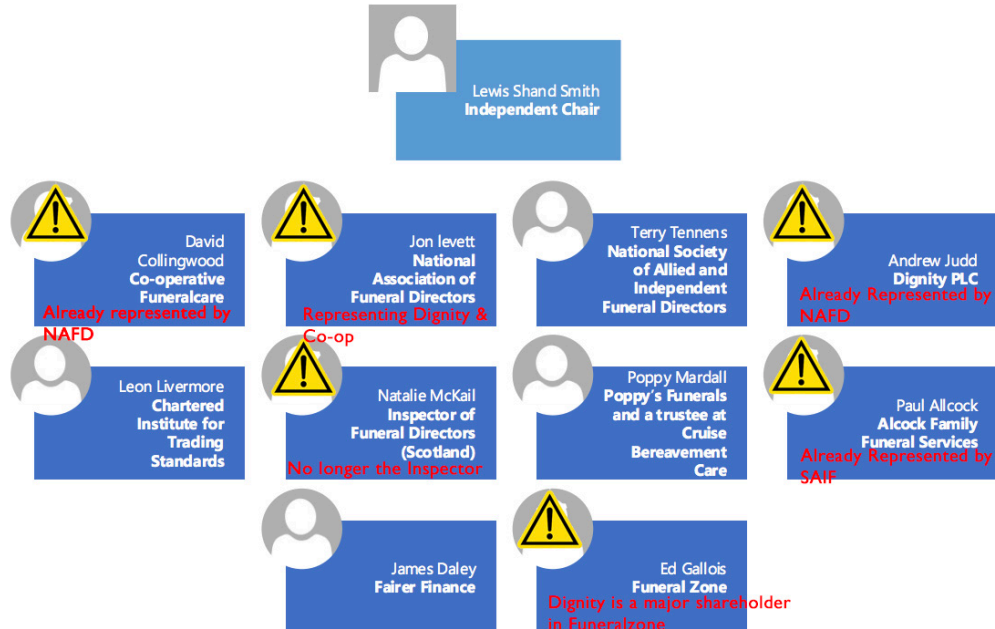
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FSCSR Steering Committee at a glance:



Organisational flowchart taken from Background document and update – July 2019 – published at <http://www.fscsr.co.uk/useful-documents/>; issues highlighted in red

I do not believe longstanding issues in the funeral industry have been caused by 'cowboy funeral directors' or 'rogue operators' as portrayed in many recent articles in the media. I believe this is an attempt by the trade associations to discredit anyone who is not a trade association member in order to protect the interests of their own members whilst the funeral industry is under so much scrutiny. I believe this attempt is being led by Dignity PLC, who are seeking to (a) regulate the industry in their favour and (b) justify their extortionate prices by claiming to lead the way in setting standards. I believe that the existence of the FSCSR is a crucial part of Dignity PLC's strategy.

Cowboy funeral directors are leaving corpses 'stacked in fridges' and 'embalming bodies on the floor', report reveals

Daily Mail, 11th August 2018

"Around a third of funeral directors belong to chains such as Co-operative and Dignity, which commissioned the report and are not criticised in it."

<https://www.dailymail.co.uk/news/article-6049371/Cowboy-funeral-directors-leaving-corpses-stacked-fridges-report-reveals.html>

Call for crackdown on 'cowboy' funeral directors in Scotland

"FUNERAL directors should be licensed as part of a crackdown on "cowboy" firms exploiting grieving relatives, SNP ministers have been told"

The Express, 24th August 2019

<https://www.express.co.uk/news/uk/1169574/funeral-directors-scotland-natalie-mckail>



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I believe that the current issues in the funeral industry have mostly been caused by the exploitative behaviour of Dignity PLC, Co-operative Funeralcare and Funeral Partners, as well as other funeral firms, who claim to be independent family-led firms, but operate in the same way as corporate chains. These funeral firms are well represented by the trade associations, who have failed to sanction them when issues concerning lack of transparency, bad practice and exploitative behaviour have been exposed.

A few examples of Dignity's exploitative pricing

'My mum's funeral costs were extortionate'

A church treasurer said she was shocked by the extortionate cost of her mother's funeral - and immediately saved hundreds of pounds by searching for a better price.

BBC, 29th November 2018

<https://www.bbc.co.uk/news/business-46384457>

Maybe this is why Dignity doesn't have funeral prices online yet?

Good Funeral Guide, 5th December 2018

<https://www.goodfuneralguide.co.uk/2018/12/maybe-this-is-why-dignity-doesnt-have-funeral-prices-online-yet/>

Grave times for Dignity as probe into funeral 'rip-offs' hits shares

Evening Standard, 29th November 2018

<https://www.standard.co.uk/business/grave-times-for-dignity-as-probe-into-funeral-ripoffs-hits-shares-a4003561.html>

GRIEF ENCOUNTER Funeral providers charging £2,400 MORE for same service just 2.2 miles apart

"An investigation by The Sun has uncovered that you could pay £2,400 more for similar funeral services from providers just a few miles apart"

The Sun, 21st January 2019

<https://www.thesun.co.uk/money/8191857/funeral-providers-charging-3800-more-same-service/>

A few examples of Co-operative Funeralcare/ Co-op Funeralcare's lack of standards:

'Co-op ruined my mother's foreign funeral and left me £1,800 out of pocket'

The Observer, 7th July 2019

<https://www.theguardian.com/money/2019/jul/07/co-op-ruined-my-mothers-foreign-funeral-and-left-me-1800-out-of-pocket>



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Co-op Funeralcare apologises to Abbey Wood widow for delay

A funeral company has apologised to a widow from Abbey Wood whose husband's body was left overnight in their home after he died.

News Shopper, 31st July 2018

<https://www.newsshopper.co.uk/news/16388803.co-op-funeralcare-apologises-to-abbey-wood-widow-for-delay/>

Woman devastated after Co-op Funeralcare Bromley 'ruins' send-off

Daughter's pain after final goodbye to her dad is 'ruined' by funeral director

News Shopper, 5th October 2018

<https://www.newsshopper.co.uk/news/16963579.woman-devastated-after-co-op-funeralcare-bromley-ruins-send-off/>

GRAVE REVELATIONS Co-op funeral home 'left dead bodies to rot in 34C heat with MAGGOTS found in coffin'

"A whistleblower spoke out after working at the Windsor funeral home, claiming a backlog of staff meant bodies were stored incorrectly and funerals were delayed at that branch"

The Sun, 27th November 2017

<https://www.thesun.co.uk/news/5008029/co-op-funeral-home-left-dead-bodies-to-rot-in-34c-heat-with-maggots-found-in-coffin/>

Family 'traumatised' over Co-op failure to take lock of hair of dead son

"Jake Smith died aged 24 and his parents remain in dispute with funeral firm over how arrangements were handled"

SomersetLive.co.uk, 14th December 2018

<https://www.somersetlive.co.uk/news/somerset-news/family-traumatised-over-co-op-2327866>

Daughter furious after blundering undertaker messed up mum's funeral

"Lyndsay Pearson was so angry and upset after firm cancelled her mum's funeral at the last minute that she changed undertakers. Devastated Lyndsay, 51, said: "Co-op Funeralcare have zero respect for people, dead or alive."

Daily Record, 13th January 2019

<https://www.dailyrecord.co.uk/authors/the-judge/daughter-furious-after-blundering-undertaker-13847361>

Grief-stricken Alison Wright from Walderslade still looking for answers from Co-operative Funeral after mother's death

"Allison Wright has been fighting to get mortuary reports from Co-operative Funeralcare to satisfy herself that her mum's requested personal belongings were buried with her."

Kent Online, 4th April 2019

<https://www.kentonline.co.uk/medway/news/i-just-want-answers-but-i-just-keep->



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[getting-fobbed-off-201972/](#)

Grieving daughter, 60, is awarded £9,000 in compensation after her mother's ashes were scattered without her knowledge after Co-op Funeralcare mix-up
"A grieving daughter was awarded £9,000 in compensation after Co-op Funeralcare mistakenly returned her ashes to a crematorium where they were scattered without her knowledge."

Daily Mail, 13th August 2018

<https://www.dailymail.co.uk/news/article-6056165/Grieving-daughter-wins-nearly-10k-compensation-op-mistakenly-scattered-mothers-ashes.html>

Family devastated by Co-op error at funeral service

"A FAMILY has told of their devastation after the wrong coffin was put out for cremation at a funeral service for their mum. Michelle Blakesley, 47, said the blunder by Co-op Funeralcare of Weymouth was 'heartless and condescending'."

Dorset Echo, 4th July 2012

<https://www.dorsetecho.co.uk/news/9797085.family-devastated-by-co-op-error-at-funeral-service/>

UNDERTAKER FORGETS TO PUT BABY IN COFFIN FOR CREMATION

"BRITAIN'S biggest funeral directors sent an empty coffin to a baby's cremation - and left the body forgotten in a fridge for three months."

Mirror, 24th April 2006

<https://www.mirror.co.uk/tv/tv-news/undertaker-forgets-to-put-baby-in-coffin-699386>

Drug-dealers stashed cocaine at funeral parlour in Cowley where they worked

"Kevin Mazey and James Robertson admitting stashing away the Class A drugs in cars and lockers at the Co-op Funeralcare premises in Cowley."

Oxford Mail, 30th January 2016

<https://www.oxfordmail.co.uk/news/14242125.drug-dealers-stashed-cocaine-at-funeral-parlour-in-cowley-where-they-worked/>

Grieving Tidworth family 'let down' by Co-op Funeral Directors

"A DISTRAUGHT family have said they have been unable to grieve for their baby girl after they were let down by a Salisbury funeral director. Jodie Lugg was left outraged by Co-op Funeral Services' handling of her five-month-old niece's cremation."

Salisbury Journal, 18th December 2017

<https://www.salisburyjournal.co.uk/news/15779519.grieving-tidworth-family-let-down-by-co-op-funeral-directors/>

"Do not use co-operative funeralcare!", "cruel, callous, heartless, ill-informed"



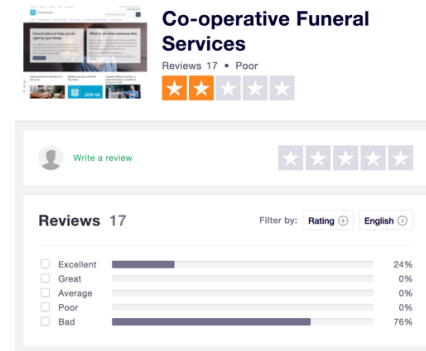
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Excerpts from customer reviews on Trust Pilot
<https://uk.trustpilot.com/review/www.co-operativefuneralcare.co.uk>



MoneySavingExpert.com

[Really angry with Co-op Funeralcare. - MoneySavingExpert.com ...](#)

<https://forums.moneysavingexpert.com/showthread>

28 Jan 2011 - 20 posts

As for the co-op..... put a strong **complaint** into them and not just the **funeralcare** you've used but also their head office and make the ...

[co-operative funeralcare are a disgrace](#) 20 posts 8 May 2010

[Co-Operative Funeralcare shame - C4 Dispatches](#) 16 posts 26 Jun 2012

[More results from forums.moneysavingexpert.com](#)

With the above in mind, I would like to suggest that it may be the NAFD's largest member, Co-operative Funeralcare, who is the 'rogue operator' and 'cowboy funeral director', so frequently referred to in the media, who has brought the entire funeral industry into disrepute.

I believe that schemes run by trade associations are not appropriate mechanisms to deal with complaints. I would support the urgent introduction of an independent ombudsman scheme, especially in light of Co-operative Funeralcare's continued failure to adhere to appropriate standards, and the NAFD's failure to sanction their biggest member.

I believe the existing trade associations have only been concerned with protecting the interests of their own membership and have failed to adapt to the changing funeral landscape and needs of bereaved people. They have failed to accommodate the needs and interests of new and progressive funeral firms, instead choosing to dismiss the important work being done to modernise the funeral industry by dismissing them as 'rogue' and 'un-desirable operators'.

"It is therefore the position of Scottish SAIF that we support the introduction of a Government Registration and Licensing requirement for the funeral sector. We believe this will immediately stop the unregulated start-up by un-skilled, un-qualified and un-desirable entrants simply taking advantage of a vulnerable public. It will also ensure the people of Scotland have a properly regulated funeral sector providing a high level of professional service."



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Although this was a view expressed by Scottish SAIF in regard to potential regulation in Scotland, I believe it is a view shared by the main trade associations, who are pursuing regulation in their favour to protect the commercial interests of their own members.

It is my belief that both NAFD and SAIF have never been responsible for introducing or maintaining high standards within the funeral industry. I would suggest that members of your Steering Committee and Working Parties visit an NAFD or SAIF approved mortuary chosen at random in the near future, without prior warning, to experience the 'high standards' for yourselves. Those of us who are involved with on-the-ground funeral service and have visited the mortuaries of other funeral firms, particularly those approved by the NAFD, are very aware of the inconsistency in standards. It therefore seriously concerns me that the NAFD or SAIF will be given any influence over potential future regulation of the industry.

I have already expressed my concerns to the secretariat regarding an article which appeared in The Times on 12th August 2019, in which it was claimed that 'funeral directors are to be given restaurant-style ratings as the industry battles accusations of over-charging and inconsistent standards.' I still have not received a satisfactory response from the secretariat as to how such a misleading article could appear in a national newspaper, when it is my understanding that the FSCSR has come to no such decision. It is my understanding that anything the FSCSR decides may be suggested to government stakeholders, but the FSCSR has no right to enforce anything, as it is not a government commissioned, led or endorsed project, although it has chosen to mirror the structure and setup of an official government group to appear legitimate.

As communicated in an email to Morgan Harris of the NAFD via the FSCSR Secretariat on 15th August 2019, I do not object to the introduction of regulation or a ratings system. I would, however, raise concerns over trade associations being appointed to regulate and award ratings, especially as they have failed to implement or maintain adequate standards in their own membership.

In a survey conducted by the NAFD and shared in the Annex of the *Report to Scottish Ministers on the introduction of a regulatory model including Progressive Licensing scheme for Funeral Directors in Scotland*, 30.43% of those surveyed strongly agreed and 39.13% agreed that "funeral firms should be required to be a member of a recognised trade body in future" (from Shaping NAFD policy direction, for 2019 and beyond, in Scotland: Question 1).

I firmly believe that trade association membership should not be mandatory for any funeral firm in the UK. Trade associations exist to protect their members, NOT the bereaved public. Therefore mandatory trade association membership would not be in the public interest.

It is imperative that any future inspection or regulation of funeral firms will need to be carried out by an entirely independent body, with no involvement from any trade association. The NAFD and SAIF cannot be given an opportunity to influence the appointment of this independent body. It is also important that membership of either NAFD and SAIF will not give any funeral firm an advantage where inspection is concerned. Members of the NAFD and SAIF must be subject to the same scrutiny as non-trade association affiliated funeral firms.



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I would like to suggest that the FSCSR investigates why so many progressive funeral firms do not wish to be affiliated with either the NAFD or SAIF. It is my understanding that a survey is currently being circulated to non-trade association affiliated funeral directors to understand why they do not wish to join the existing trade associations.

The results of the survey will be shared with the Competition and Markets Authority in due course. I am sure it will be possible to share the findings with the FSCSR to enlighten the Steering Committee and working groups as to why a reputable funeral firm would not join a trade association.

I'd like to reiterate that by accepting your invitation to join a 'Stakeholder Reference Group', this is in no way an endorsement or statement of support for the work you're doing. I don't believe the FSCSR exists for the greater good of the bereaved public; I believe it is a lobbying group created by Dignity PLC to protect the interests of corporate funeral firms through regulation in their favour. I reiterate my belief that the creation of the FSCSR is part of Dignity's long term strategy to justify their own extortionate prices by claiming to lead the way on 'quality and standards'.

As I previously said in an email to the secretariat, I hoped this group would operate at the level of transparency and honesty we need to expect from the funeral industry of the future. So far, I have not been reassured that this is the case.

I would like to express how uncomfortable it is to submit this letter to the FSCSR via the secretariat, the NAFD, who will now be privy to my views on the many failings of their trade association.

I hope that, as independent chair of the FSCSR, you will understand and respect my concerns.

Yours sincerely,

Louise Winter
Funeral Director & Founder
Poetic Endings

cc. Funerals Team, Competitions and Markets Authority
Fran Hall, Good Funeral Guide



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