

SAIF's Competition and Markets Authority bulletin #4 - 230621



CMA Order: what you need to display in branch and online

In the text below, links to further information on third-party websites are underlined and in light blue.

CMA price transparency requirements

Following SAIF's webinar on 22nd June to introduce the Competition and Markets Authority's (CMA) Funerals Market Investigation Order to members, it is clear many questions persist about how to implement its various constituent parts.

The Order is comprised of 'articles', including:

- Articles 3-5 (covering price transparency, terms of business, disclosure of interest), Article 6 (prohibited practices)
- Article 7 (termination of practices)
- Article 8 (crematoria price transparency)
- Article 9 (reporting to the CMA).
- The relevant parts of the Order are supported by an Explanatory Note document.

The above listed articles are likely to have the most impact on how SAIF members run their businesses. To help independent funeral directors navigate this process, a series of bulletins looking at each of these parts of the Order is being prepared. This first bulletin in the series looks at the CMA's price transparency rules.

CMA Funerals Market Order Article 3 key points:

In branch

Funeral directors should populate the CMA's 'Standardised Price List' template with pricing information for an Attended Funeral, Unattended Funeral (if offered), Fees You Must Pay for burials and cremations in the local area, and Additional Funeral Products and Services.

Details of how to edit the price list can be found on page 7 points 27-34 of the Explanatory Note document. You should also view Schedule 1 Part B of the Order on page 25.

The Standardised Price List must be displayed in a 'clear and prominent' manner in branch areas frequented by clients and it should be on an A2 sized poster or on a similarly sized digital display. If you don't have space, then A3 is acceptable. In branch windows, the price list should be displayed on a document no smaller than A4 size.

[Here](#) is the Standardised Price List in Word format, ready for you to edit.

You can add your firm's logo, contact details and colour the document to match your colours. But you are not permitted to change the wording, except where the document requires you to insert information or figures.

Alongside the Standardised Price List, you must display price information provided to you by crematoria operators, your terms and conditions and disclosures of interest. This additional information will be covered in the next bulletin on this very topic later this week. Please note that this information should be on an A2 poster, or A3 if you are without space for an A2 size, but not on the same poster as the Standardised Price List.

Any funeral products and services that are not on the Standardised Price List fall into what the CMA terms the 'Additional Options Price List'. Think of this as your other funeral packages, such as a traditional funeral or a bespoke funeral. There is no stipulation as to the format in which this is presented but it should be itemised.

The Additional Options Price List does not have to be on an A2 size poster but it should be in a clear and prominent position in any branches. For example, this could be a clearly labelled artworked brochure made available in a reception area.

Online

If you have a website, you must display the Standardised Price List on a webpage no more than one click from your home page in order to satisfy the CMA's 'clear and prominent' rule. This means you will need to refer to price information on your home page, whether that be a clickable tab on your website's menu navigation, or a link to the Standardised Price List.

On your website, the Standardised Price List must be downloadable as a PDF document. If this is technically impossible, it must be presented in html format. Alongside this, you should display the price information provided to you by crematoria operators, as well as terms of business and disclosure of interests (the latter two should be in PDF format).

The Additional Options Price List does not need to be in PDF format and you may present this information as you currently do, although it is sensible to ensure that the title of any page for additional options is Additional Options Price List.

SAIF understands that the CMA is comfortable with the way A. Abbott & Sons in Northamptonshire has presented its price information and this business's website can be viewed [here](#).

Please note, if you have displayed your price information on your website, you do not need to post it on any other digital online channels. If you do not use a website but use other online channels to market your services, you must post the Standardised Price List and information provided by crematoria operators on these, and this includes a company Facebook page or Instagram account.

If you do not use any online channels to market your business at all, then you do not have to display your prices digitally anywhere.

Answering members' questions

It was clear from the webinar that members have many questions about the CMA Order. SAIF has developed an FAQs and this can be accessed in the members' area of the [SAIF website](#). Please note that this is being updated regularly as new information comes in and our interpretation of the Order becomes clearer.

Some sample questions which came up on the webinar include:

- The Standardised Price List doesn't allow for different collection of deceased charges determined by office hours or out of hours.

One way around this is to state the minimum in the Attended Funeral section and state the higher charge for out of hours or excess office hours above a certain amount in Additional Funeral Directors Products and Services on the Standardised Price List. You can also state your normal hours of business in your premises and on your website. The owner always has the option to waive these if they wish, as there is nothing to stop you reducing a price or simply not increasing or introducing it.

- We use five local authorities all with different fees. Which ones do we display?

The short answer is the typical cost in the Standardised Price List but all prices must be available in your branch and on your website, if you have one. Please see Article 8 beginning on page 13 of the Order for further information.

- What happens if we put £0.00 in the Standardised Price List for items we don't normally charge for?

You cannot do this. The Explanatory Note page 7 point 26 states: "The price of each individual item of the CMA Attended Funeral must be greater than £0." There's nothing in the Order to say you cannot put £1 in such instances.

SAIF Business Centre

National Society of Allied and Independent Funeral Directors (SAIF)

www.saif.org.uk Tel: 01279 726777 0345 230 6777