

# Strengthening regulation in the funeral plan sector

What should it look like?



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## 1. Executive Summary

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Dignity and Fairer Finance published research<sup>1</sup> (referred to as the Dignity/Fairer Finance research from hereon in) in July 2017, looking at the state of the funeral plan market and calling for stronger regulation of the sector. Subsequently, a consensus has begun to crystallise that this is a necessary step.

The Dignity/Fairer Finance research investigated whether the funeral plan market is working well for consumers and examined, in particular:

- sales practices, including how product features are communicated to customers, as well as current data gathering and consent practices;
- the fees and charges levied in connection with funeral plans, and the appropriateness of existing cooling-off periods;
- the current regulatory environment of the funeral plans marketplace and discussed the potential benefits of introducing a statutory regulator.

The market is growing and business models are changing and reacting to the increased competition from existing players and new entrants into the market.

The Dignity/Fairer Finance report concluded: “There is a perfect storm brewing – a combination of bad conduct and lack of transparency, matched with a vulnerable customer set and rapidly growing sales. The outcome cannot be good for consumers.”

As a result of proactive action taken by the FPA, and Dignity/Fairer Finance’s joint report, we have observed some positive changes including widespread interest from those outside the FPA seemingly keen to join and improved conduct generally, although some issues remain. In addition, the FPA is actively reviewing its rules and code of practice with the expectation that the bar will be raised.

The purpose of this White Paper is to contribute to this debate further and to set out some proposals as to what enhanced regulation in the sector might look like. It builds on the current voluntary rules, codes of practice and guidelines issued by the Funeral Planning Authority, who continue to do much good work in trying to raise standards in the sector, but which suffers from being an organisation membership of which is voluntary.

The proposals include setting out the agenda for a statutory regulator including raising the visibility and transparency of its work, enhanced conduct and prudential regulation and supervision of the Plan Providers and their distribution networks.

Dignity are keen to stimulate debate through consultation with all interested parties in the funeral plan sector such that the risks of “the perfect storm brewing” are mitigated through an industry wide consensus on the necessary next steps.

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<sup>1</sup> <https://www.fairerfinance.com/assets/uploads/documents/Funeral-plan-report-FINAL-6-July-2017.pdf>

### 2. Introduction

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The Dignity/Fairer Finance report concluded that the funeral planning market is not always working well for consumers because:

- although funeral plans can serve a very important purpose, their exact benefits, risks and limitations are not always well described by providers;
- consumers are often left with a false impression of what their plan covers and are not being made aware of exclusions and key risks of prepaid funeral plans.

The report noted that this would be unacceptable conduct in any market, but it is of particular concern where salespeople or ‘distributors’ of funeral plans are regularly coming into contact with elderly and potentially vulnerable people (typically aged 65 or over).

The report also expressed concerns over the market’s potential prudential risk, or the safety of customer money, including expressing “serious concerns that one or two providers are taking out too much money from their trusts, in commission and administration fees. This could result in a deficit.” The key prudential risk appears to be that there is insufficient funds to meet the funeral plan liabilities rather than the failure of a plan provider.

Thus the Dignity/Fairer Finance report concluded that enhanced regulation is required over both the prudential and conduct elements of the funeral plan market and suggested 3 potential regulatory options for improved outcomes in the funeral plan market:

- Option 1: Improved voluntary regulation with FCA support
- Option 2: Statutory regulation led by FPA
- Option 3: Statutory FCA regulation

This White Paper builds on the Dignity/Fairer Finance report by considering and setting out a proposed model of what that regulation might look like under the second or third regulatory options identified above. This recognises that Option 1 is not appropriate, and while Option 2 is Dignity’s strong preference and the most appropriate approach, Option 3 is significantly preferable to maintaining the status quo.

Coinciding with the Dignity/Fairer Finance report and industry roundtable in late 2017, the FPA is undertaking an internal process to understand what stronger regulation of the sector could look like. This paper is intended to feed into this.

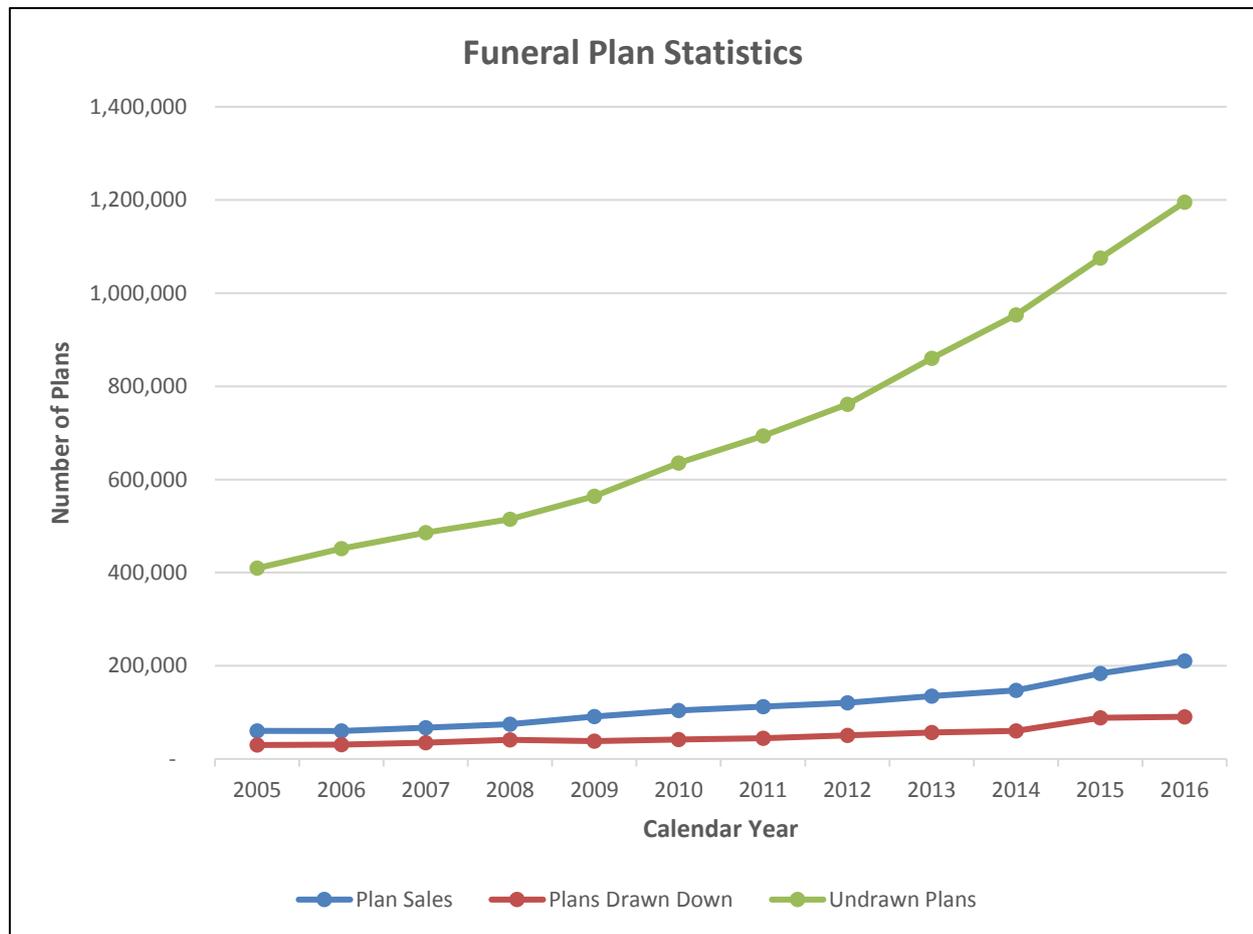
The White Paper considers:

- Why regulation is necessary
- The interaction with regulation of the UK insurance and financial services industry
- What regulation currently exists in the funeral plan sector
- What the expected outcomes of enhanced regulation of the funeral plan sector might be
- What the potential scope and structure for an enhanced regulator might be

- What should the conduct rules cover
- What the prudential rules should cover – particularly for trust-based plans

**3. Why regulation is necessary: Growth in sales of Funeral Plans**

The chart below displays the growth in sales of funeral plans from 2005 to 2016 using the statistics published by the Funeral Planning Authority (FPA)<sup>2</sup> – the current voluntary regulator of the funeral plan market. As can be seen from the chart, funeral plan providers registered with the FPA have sold an increasing number of plans per annum. Less than half of that number of new plans are drawn down each year and, consequently, there is an increasing portfolio of plans undrawn.



Whilst the average cost of a funeral (Sun Life, Royal London et al) is frequently cited as being £3,800-£3,900. The average funeral plan purchased is probably closer to £3,300-£3,400<sup>3</sup> which would mean that during 2016 approximately £700m was paid in premiums. This represents “retail” funeral costs (the

<sup>2</sup> <https://funeralplanningauthority.co.uk/statistics/>

<sup>3</sup> Estimate, source Dignity

cost to the customer), rather than the “wholesale” funeral costs (what it costs the funeral director<sup>4</sup>). This is still likely to include some element of profit margin for the funeral director.

If we assume £2,600 as an approximate “wholesale” figure representing a funeral directors liability this represents approximately £3.3 billion of outstanding liabilities on undrawn plans. These statistics may be over or understated as a result of a gradual shift in the market, which is a move from single payment towards instalment plans but may be indicative of the potential size of the market.

There has not only been growth in the funeral plan market but there has been other change in terms of:

- A growing number of funeral plans being purchased on an instalment basis as opposed to a single ‘premium’ basis;
- Increased competition driving Plan Providers to differentiate their products by the use of ‘guarantees’ to pay some or all of the related costs of funerals including some 3<sup>rd</sup> party costs such as crematoria fees, burial costs and medical expenses with the risk attaching to those guarantees perhaps not being adequately priced by Plan Providers; and
- The entry into the market of new distribution channels who are reliant on commission from the Plan Provider for their business model – including “comparator” websites and telephone sales companies.

An enhanced regulatory regime is necessary to ensure appropriate customer outcomes in the funeral plan sector because of its growing size, changing practices and because it deals with customers who might be considered vulnerable.

#### **4. Regulation of the UK financial services industry**

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The financial services industry in the UK is regulated and supervised by the Prudential Regulation Authority (PRA) and the Financial Conduct Authority (FCA). The Pensions Regulator (TPR) is also relevant in respect of workplace pensions.

The PRA regulates and supervises around 1,500 banks, building societies, credit unions, insurers and major investment firms and it has three statutory objectives:

- To promote the safety and soundness of the firms it regulates.
- To contribute to securing an appropriate degree of protection for insurance policyholders.
- To facilitate effective competition between firms.

The FCA regulates and supervises the conduct of more than 56,000 businesses (including those noted above as being regulated by the PRA) by ensuring financial markets are honest, fair and effective such

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<sup>4</sup> The cost of providing services will vary from business to business, based on type and size of business, as well as facilities and resources they represent (Staff, premises, fleet and mortuary facilities) and the third party costs (burial, cremation, minister and doctors’ fees)

that consumers get a fair deal. The FCA's strategic objective is to ensure that the relevant markets function well and its operational objectives are to:

- To protect consumers – by securing an appropriate degree of protection for consumers.
- To protect financial markets – by protecting and enhancing the integrity of the UK financial system.
- To promote competition – by promoting effective competition in the interests of consumers.

TPR regulates and supervises workplace pension schemes. As a regulator it is responsible for protecting people's savings in workplace pensions, improving the way that workplace pension schemes are run and reducing the risk of pension schemes ending up in the Pension Protection Fund (PPF). The TPR's mission is to be a strong, agile, fair and efficient regulator, gaining the respect of employers, trustees and other stakeholders. Together with its partners, it is seeking to drive up standards of trusteeship and improve savers' understanding of their situation to create better outcomes in their later life.

The TPR has three categories of powers:

- Gathering information – through employer's declarations and scheme returns and research and analysis;
- Regulatory and enforcement action – including banning trustees considered not fit and proper, issuing fines, or requiring actions to be carried out; and
- Acting against avoidance – where employers are seeking to avoid pension obligations.

Both the PRA and FCA have rulebooks/handbooks setting principles by which they manage the prudential and conduct risks of firms they regulate. The PRA's Rulebook<sup>5</sup> contains elements which might assist in the prudential regulation of the funeral plan market. The FCA's Conduct of Business (COB) and Insurance Conduct of Business (ICOB)<sup>6</sup> Sourcebook rules are further examples of rulebooks that can provide further detailed guidance and provide many of the principles that might be adopted in a proportionate manner. The TPR utilises primarily codes of practice and regulatory guidance and statements as part of its regulatory toolkit. It publicises its activity through issuing regulatory intervention reports.

The 2016 Insurance Distribution Directive<sup>7</sup> (a minimum harmonising directive of the EU), which is to be implemented in 2018, also provides useful guidance and input in terms of a set of minimum standards for the manufacture and distribution of products in a retail financial services sector such as the funeral plan market.

However, none of these rulebooks can be lifted wholesale and applied as they are to funeral plans and there will be areas where these need to be tailored or additional rules provided to reflect the peculiarities of how the funeral plan sector operates and the differing business models of the sector. In addition, any proposals need to apply the principle of 'proportionality' by recognising the differing

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<sup>5</sup> <http://www.prarulebook.co.uk/>

<sup>6</sup> <https://www.handbook.fca.org.uk/handbook>

<sup>7</sup> <http://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32016L0097&from=en>

nature, size and complexity of the business models utilised by the various participants in the funeral plan sector whilst respecting the principle that there needs to be an agreed set of minimum standards such that the funeral plan market provides appropriate protection for its customers from both a conduct and prudential perspective. The application of any new set of regulations will also require an appropriate period of transition to allow individuals and firms to migrate existing business practices to the new rules.

These minimum standards need to be applied to both 'Plan Providers' (or 'manufacturers') – including proper management of funds in trusts – and 'distributors' of funeral plan products. In some cases the manufacturer and distributor will be the same organisation and in other cases the Plan Provider will have out-sourced the marketing and selling of a funeral plan product to a third party organisation – the distributor.

Applying these rules to trusts will need to involve consideration on the impact on trustees and their role. In order to operate effectively it is likely that the statutory regulator will be required to have contact with both the Plan Provider and the trustees. This is consistent with the model used by the Pensions Regulator (TPR).

### **5. What regulation currently exists in the funeral plan sector?**

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The Funeral Plan market is regulated by the FCA, that is, unless funeral plan providers meet certain criteria which allows them to utilise the exemptions available under the Financial Services and Markets Act 2000 (Regulated Activities) Order 2001<sup>8</sup>.

All providers use this exemption, and most (but not all) providers opt, and meet the requirements needed, to become a voluntary registered provider with the self-regulatory body, the Funeral Planning Authority.

Articles 59 and 60 of the Regulated Activities Order defines a Funeral Plan Contract and excludes from regulation funeral plan contracts covered by:

- insurance (where sums paid by the customer under the contract are applied towards a contract of whole life insurance effected by an authorised person who has permission to effect and carry out such contracts of insurance); or
- trust arrangements (where sums paid by the customer under the contract will be held on trust for the purpose of providing the funeral). There are a number of conditions required of a trust for it to meet the definition.

The prudential element of regulation is in theory covered by the requirement that customer money from funeral plan sales must be paid into a trust fund or whole of life insurance contract. The latter is provided by a fully regulated entity under the regulation and supervision of both the PRA and FCA. The prudential element covers the safety of customers' money and is aimed at ensuring an appropriate

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<sup>8</sup> <http://www.legislation.gov.uk/uksi/2001/544/contents/made>

degree of protection for funeral plan holders in terms of funds being available to meet the obligations of the funeral plan at the time of need.

However, for these plans that fall within the exemption, there remains a gap in protection as FSCS protection does not apply and therefore would not provide protection for individuals who have a funeral plan with a provider that fails<sup>9</sup>. Although there would likely be a separate pool of assets to be allocated for plan holders, it is unclear what the process or mechanism would be to do this. This applies whether a plan is purchased paying a lump sum or by paying a monthly amount to a funeral plan provider.

### Voluntary oversight

As indicated above the Funeral Planning Authority (FPA), is the voluntary self-regulatory body formed by the sector's participants.

The Dignity/Fairer Finance report noted that the majority of poor conduct issues in the funeral plan market emanate from organisations who are not members of the FPA.

There are also two main funeral trade related organisations in existence in the funeral plan market that as part of their membership criteria utilise rules and/or codes of conduct (but not specifically related to the sale of funeral plans). These trade bodies are the National Association of Funeral Directors (NAFD) and the Society of Allied and Independent Funeral Directors (SAIF)<sup>10</sup>.

All of these bodies are voluntary organisations and there is no compulsion for funeral directors or funeral plan providers to become members.

From a (voluntary) regulatory perspective, the most important of these organisations is the FPA whose registered providers include the overwhelming majority of funeral plan providers. The FPA is “an organisation set up by the industry to regulate providers in the UK pre-paid funeral plan industry. Their primary aim is to ensure providers that are registered with the FPA are operating in a manner that will result in customers getting the funeral they have paid for, at the time of need. By choosing a registered provider this provides an additional level of reassurance to the customer purchasing a plan.”

The FPA says it provides “objective scrutiny to providers who choose to register”. This is carried out by an independent Compliance Committee, which ensures that providers conform to the FPA Rules<sup>11</sup> and a Code of Practice<sup>12</sup>. Thus, consumers are given basic protection and reassurance when they buy a plan from a registered FPA provider. Approximately 90% of plan providers<sup>13</sup> representing 95% of new plans now operate under the voluntary FPA regulations, but the FPA has limited scope for enforcement compared to other regulatory bodies, particularly those in the financial services sector. It is understood that the FPA works extensively with providers to seek to change and modify behaviour, although this

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<sup>9</sup> <https://www.fscs.org.uk/what-we-cover/products/funeral-plans/>

<sup>10</sup> <https://funeralplanningauthority.co.uk/about-us/>

<sup>11</sup> <https://funeralplanningauthority.co.uk/regulations/rules/>

<sup>12</sup> <https://funeralplanningauthority.co.uk/regulations/code-of-practice/>

<sup>13</sup> Currently 24 registered providers <https://funeralplanningauthority.co.uk/hideout-app/app-uploads/2017/11/Provider-List-29-November-2017.pdf> (Open, Pride Planning and Safe Hands are known plan providers not currently registered FPA providers)

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may not be visible externally. Being struck off the FPA register really only poses risks to reputation, not the viability of a funeral plan provider's business and the FPA only has the ability to fine members up to £5,000. As noted earlier in this document, the FPA is currently reviewing its code and rule book with the anticipation of higher standards and tougher consequences for failing to adhere.

The activity of the FPA has been strengthened in recent years by the appointment of wholly independent Directors to the FPA's Board. The FPA has recently been active in:

- on an annual basis reviewing key aspects of all registered providers operations
- monitoring key statistical and financial information (provided quarterly by all registered providers) to check that liabilities can be met particularly in a situation where the provider was to fail
- providing an escalation service to customers who have been unable to resolve complaints with a provider including the provision of a binding independent arbitration service
- improving plan provider complaint procedures;
- investigating allegations of non-compliance with Rules/Code of Practice and where necessary requiring appropriate remedy;
- clamping down on mis-advertising particularly in lead generation and comparison websites by removing logos, removing suggestions of independence or comparison where this was not the case;
- providing appropriate diligence on new provider applications and their business models to ensure that new FPA registered providers are carrying on their business to an appropriate standard;
- protecting client money by ensuring that registered providers are complying with the exemptions set out in the Regulated Activities Order.

The extent to which the FPA has changed and is changing perhaps masks the very good work it is carrying out. Making these activities more visible and transparent, would possibly provide greater confidence and evidence that the FPA is tackling any poor conduct identified by its registered providers and potential new registered providers.

The FPA's Rules cover the following areas:

1. General interpretation and definitions
2. Registration of FPA providers
3. Conduct of FPA providers
4. Plan Funds including rules relating to whole life assurance plans and statutory trust-based plans
5. Complaints against FPA providers
6. Monitoring, Compliance and Enforcement procedures of the FPA
7. Discipline procedures for FPA providers
8. Pledge to Customers in the event of the insolvency of a FPA registered provider

The FPA's Code of Practice covers the following areas:

1. Conduct
2. Marketing and Advertising

3. Information
4. Contracts and Documents
5. Plan Funds
6. Complaints and Disputes
7. Pledge to Customers

The FPA has also issued guidance to its membership covering:

- The contents of Key Features Documents (July 2015) as required under the FPA rules in terms of providing a clear and balanced summary of the price, aims, features and risks of a funeral plan;
- Terms and Conditions (March 2016) in terms of their clarity and to aid assessment against the FPA's Code of Practice requirements; and
- The use of Third Parties by FPA members as part of the sales and marketing processes of funeral plan providers which clearly states that FPA members are responsible for the conduct and actions of third parties with whom they work.

Whilst the FPA's activity amongst FPA registered providers is actively strengthening and increasing, it cannot necessarily address all of the issues raised by the Dignity/Fairer Finance research. This is as a result of its voluntary status, potential lack of real enforcement power and its current ability to be fully transparent as a voluntary regulator.

The FPA's voluntary status only allows it to oversee those who decide to register with it having no jurisdiction over those who decide not to participate or co-operate. The FPA is unable to enforce action through statutory powers resulting in a potential lack of real enforcement power, such as the ability to cease trading. Statutory regulators such as the FCA typically publicise enforcement action they have taken in response to poor practice, such as levying fines and ceasing trading. The FPA is not able to be fully transparent in this way, and is understood to intervene privately in many cases without publicising this. These points would all be addressed through statutory regulation.

## **6. What should the expected outcomes of enhanced regulation in the funeral plan sector be?**

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To provide a basis for the vision for future regulation of the funeral plan sector it is proposed that this is based on a series of outcomes.

From a prudential perspective, funeral plan holders make a payment or payments in advance in return for the provision of services when death happens. As with any service where payment is made in advance, funeral plan holders are exposed to the risk that the provider may fail or sufficient funds may not be available, and to the fact that the incentives of management and plan holders may not be aligned.

Therefore, the prudential regulatory focus needs to ensure that funeral plan holders have an appropriate degree of continuity of provision in terms of the delivery of the services at the time of need. Ensuring continuity of provision for a sustainable market requires Plan Providers to be able to

meet claims from, and material obligations to, funeral plan holders and/or funeral directors as they fall due, which, in the case of some plans, may emerge after many years.

From a conduct perspective, the FCA's Handbook of rules and guidance sets out obligations on regulated financial services firms in the way they treat consumers. This ranges from the high level Principles for Business to detailed rules and guidance on complaint handling and redress. The FCA has six customer outcomes underpinning its Treating Customers Fairly<sup>14</sup> regime which set the baseline expectations of how firms should treat consumers and also provide the basis for the FCA's vision of what consumers can expect to see when firms are treating them fairly<sup>15</sup>.

We have used the underlying principles of both the PRA and FCA to generate the following expected outcomes that we are proposing as the objectives for regulation of the funeral plan sector:

- Outcome 1** Consumers can be confident they are dealing with firms where the fair treatment of customers is central to the corporate culture of a Plan Provider
- Outcome 2** Funeral Plan products and services marketed and sold in the funeral plan market are designed to meet the needs of the identified customers and are targeted accordingly
- Outcome 3** Consumers are provided with clear information and are kept appropriately informed before, during and after the point of sale of the Funeral Plan
- Outcome 4** Where consumers receive advice over which Funeral Plan to buy, the advice is suitable and takes account of their circumstances
- Outcome 5** Consumers are provided with Funeral Plans that perform or deliver as Plan Providers have led them to expect, and the associated service is of an acceptable standard and as they have been led to expect
- Outcome 6** Consumers do not face unreasonable post-sale barriers imposed by Plan Providers to change product, switch service provider under the Funeral Plan, submit a claim or make a complaint
- Outcome 7** Consumers can be confident that the Plan Provider can meet its obligations as and when they fall due

These expected outcomes should be consulted on and agreed by the funeral plan sector as the high level outcomes for any statutory regulation of the sector. Underpinning the outcomes a detailed rule book will need to be put in place.

## 7. What should the scope and structure of the regulator be?

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Fairer Finance in its research set out three options for the future regulation of the funeral plan sector:

- Option 1: Improved voluntary regulation with FCA support

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<sup>14</sup> <https://www.fca.org.uk/firms/fair-treatment-customers>

<sup>15</sup> [FCA Mission: Our Future Approach to Consumers](#)

- Option 2: Statutory regulation led by the FPA
- Option 3: Statutory FCA regulation

Fairer Finance recommended Option 3 which is possibly the easiest to initiate because it could be done by removing the current statutory exemption in the Regulated Activities Order, although the longer term implications are likely more complex. It is not clear whether Fairer Finance have considered the prudential implications of their recommendation and whether they believe the PRA should be involved in future regulation or that the FCA should be both a conduct and prudential regulator and supervisor of the funeral plan market. The initial Dignity/Fairer Finance work was also not intended to look at the time or cost for the FCA to develop an appropriate regulatory regime.

Dignity, along with some other FPA plan providers have funded further work from Fairer Finance to build on the research conducted for the Dignity/Fairer Finance report, conducting additional analysis of the funeral plan market which will add to the understanding and potential costs and benefits associated with either statutory FPA regulation or FCA regulation pathways.

However, given the number of differing business models used in the funeral plan sector, the differing size and scale of the individual Plan Providers and the need for both conduct and prudential regulation, full FCA regulation would probably be the least popular option for the funeral plan sector as a whole. It potentially exposes the sector to full FCA and/or PRA regulation without full consideration of the proportionality of that regulation to the sector. It would be easy for both regulators to apply their rules without thought given to a proportionate and risk-based set of regulatory rules catering for all participants in the market.

It is Dignity's view that if there is to be improved regulation of the funeral plan sector then statutory regulation under the direction of the FPA is required to improve the effectiveness of regulation across the whole sector. This is Dignity's preferred option.

The following principles are believed to be the minimum requirements for a statutory regulator of the sector. These could be the subject of consultation by interested parties prior to any statutory regulator being formed.

### **Scope, status and governance**

- The regulator must regulate Plan Providers (manufacturers) of funeral plan products, as well as all those who distribute them by ensuring that Plan Providers are responsible for the conduct of their distributors, whether these be internal or out-sourced sales organisations/call centres; comparison sites/lead generation companies; funeral directors; and charities, building societies, insurers and media groups, all of whom currently can and do sell these products.
- The regulator's rules must apply to Plan Providers of both the insurance and trust-based models of funeral plan provision in order to ensure appropriate standards of conduct and prudential regulation across the sector.
- The regulator must be established on a statutory basis with compulsory registration and participation required for all Plan Providers. Participants in the funeral planning market should not be allowed to trade without being licensed by the regulator in order to ensure that there is

appropriate regulation of the sector applicable to all participants. Should a distributor wish to be directly regulated there should be no bar to the firm applying to the regulator for authorisation.

- The regulator must have an independent board with at least the chair appointed by the Economic Secretary to the Treasury (whose role includes responsibility for financial services regulation) for a fixed term. This will put statutory regulation of the sector on the same footing as, for example, the Pensions Regulator where all Board Members are appointed by the Secretary of State for Work and Pensions<sup>16</sup>.
- The Board should publish an Annual Report which accounts for its own supervisory record and performance in the previous year, and examines the current state of the market and provides a focus for its future supervision and monitoring activity. This is standard practice for all independent regulators and promotes accountability and transparency in the regulatory and supervisory activity being carried out.
- The regulator should be accountable, open and transparent about its supervisory activity over Plan Providers and any enforcement action taken against Plan Providers. This helps to ensure that Plan Providers understand the consequence of poor conduct and therefore acts as both a deterrent for poor conduct and helps raise standards generally across the market.

### Key functions of the regulator

- The regulator must publish and maintain a set of clear, fair and proportionate rules which cover the conduct and prudential regulation of the sector. Appropriate transitional arrangements will need to be drafted to cater for a move from a voluntary to a compulsory regulator.
- The regulator should enforce an individual accountability regime whereby at least one Director (or equivalent) of a Plan Provider becomes an Approved Person of the regulator and that individual should be made responsible for the activity of the Plan Provider to the regulator. This will need to recognise the independent role of trustees.
- The regulator should only approve individuals who it deems are fit and proper to hold the role of Approved Person. The regulator should be required to set out criteria which are proportionate and appropriate to the funeral plan sector.
- The regulator must require evidence from Plan Providers that appropriate risk and governance controls are in place from both conduct and provider solvency perspectives.
- The regulator must require the annual disclosure of relevant and appropriate information from Plan Providers, including on their distribution partners.
- The regulator must undertake pro-active monitoring and supervision of all Plan Providers and their distributors.
- The regulator's supervision and monitoring activity should include the rights to inspection of Plan Providers and their distribution partners. The regulator should set out the frequency and notice given, but it should include the option for inspections at minimal notice by the regulator.
- Supervision and monitoring activity should apply to both existing and legacy products.

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<sup>16</sup> <https://www.gov.uk/government/news/chair-of-the-pensions-regulator-re-appointed>

### Enforcement powers of the regulator

- The regulator must have the ability to undertake the following enforcement action where rules have been breached:
  - Suspend or cease trading of any Plan Provider.
  - Levy fines of a proportionate value on Plan Providers and Approved Persons.
  - Require remedial action to be undertaken by Plan Providers where ongoing problems are identified (e.g. requiring changes to literature where it is found to be misleading for consumers).
- The regulator should be able to take enforcement activity against the Plan Provider's Approved Person including the ability to publicise the outcome of that enforcement activity.
- There must be a clear whistleblowing process – based on the FCA model for whistleblowing – which allows suspected bad practice or rule breaches to be flagged to the regulator through a confidential and anonymous process.
- The regulator should publish all material enforcement action that is taken (i.e. where there is proven wrong doing) both at the time and in its Annual Report.

## 8. What should the regulator's conduct rules include?

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### Introduction

The conduct of both Plan Providers and distributors of funeral plans need to be considered under conduct regulation. To facilitate regulation of the sector it is proposed that the conduct of funeral plan distributors be made the responsibility of the manufacturer of the funeral – the Plan Provider. This is in accordance with the current requirements of the FPA and is not a new concept within the funeral plan market. It also means that Plan Providers are acting in a similar manner to the requirements made of FCA regulated financial services firms for the conduct of their appointed representatives.

The Dignity/Fairer Finance research noted concerns over unacceptable conduct in the funeral plan market, particularly where salespeople or 'distributors' of funeral plans are regularly coming into contact with elderly and potentially vulnerable people such as those who may recently have suffered a bereavement. The FCA has particular concerns over the treatment of vulnerable customers by the wider financial services industry in the UK and the majority of funeral plan market customers currently fall within the definition of a vulnerable customer. Therefore the conduct rules need to consider this as an over-riding theme of the conduct rules.

The future conduct regulation of the funeral plan sector might be regulated in accordance with the following principles which are partly based on the requirements of the Insurance Distribution Directive (IDD) and its related guidance together with aspects of the current FCA rules. It should be noted that many of these principles are or may already be addressed by the FPA Rules, Code of Practice and related guidance. The IDD has been used as a guide as it is the most recent distillation of best practice at a minimum standards level with relevance to the distribution of retail financial services products.

The implementation and regulatory supervision of the principles would need to be addressed in a proportionate manner by differing Plan Providers in accordance with the scale and complexity of their individual business model and this is reflected in the principles. However, it is important that in ensuring this proportionality the regulations are not watered down to the point of becoming ineffective.

### **Principle 1 – Establishment of funeral plan product oversight and governance arrangements**

- Plan Providers should establish and implement product oversight and governance arrangements that set out appropriate measures and procedures aimed at designing, monitoring, reviewing and distributing funeral plan products for customers, as well as taking action in respect of funeral plan products that may lead to detriment to customers (product oversight and governance arrangements).
- The product oversight and governance arrangements need to be proportionate to the level of complexity and the risks related to the funeral plan products as well as the nature and complexity of the relevant business of the Plan Provider.
- The Plan Provider should set out the product oversight and governance arrangements in a written document (product oversight and governance policy) and make it available to its relevant staff.

### **Principle 2 – Objectives of the product oversight and governance arrangements**

- The funeral plan product oversight and governance arrangements should aim to prevent and mitigate customer detriment, support a proper management of conflicts of interests and should ensure that the objectives, interests and characteristics of customers are duly taken into account.

### **Principle 3 – Role of management**

- The Plan Provider's administrative, management or supervisory body or equivalent structure responsible for the manufacturing of funeral plan products should endorse and be ultimately responsible for the establishment, implementation, subsequent reviews and continued internal compliance with the product oversight and governance arrangements.
- The regulator should require an individual employee (the Approved Person) of the Plan Provider to be approved by the regulator as fit and proper and who will take individual accountability for the Plan Provider's carrying out the product oversight and governance arrangements and overall compliance with the regulator's rules.
- The Approved Person should be a Director/member of the Plan Provider's administrative, management or supervisory body such that he has appropriate oversight and influence over the activity of the Plan Provider.
- The Approved Person should be subject to fitness and propriety checks by the regulator prior to approval in terms of reputation, integrity and competence (knowledge, experience and/or relevant qualifications). Guidance on the precise requirements should be set out by the regulator at the outset, and it is critical that this is proportionate.
- The Approved Person should be subject as an individual to the disciplinary and enforcement provisions of the regulator.

- It should be noted that this may be difficult to achieve given the potential for a conflict of interests between someone fulfilling an Approved Persons role, and separately, Trustees. However, it would be for the regulator to decide how this could best be implemented.

### **Principle 4 – Review of product governance and oversight arrangements**

- The Plan Provider should regularly review the product oversight and governance arrangements to ensure that they are still valid, relevant and up to date and the Plan Provider should amend them where appropriate.

### **Principle 5 – Dealing with vulnerable customers**

- The Plan Provider should recognise and take steps to ensure that the product oversight and governance arrangements recognise they are dealing with potentially vulnerable customers and how this is reflected in the Plan Provider's and or its distributor's activities.
- The Plan Provider should only design and bring to the market funeral plan products with features, and using identified distribution channels, which are aligned with the interests, objectives and characteristics of its customers.
- When deciding whether a funeral plan product is aligned with the interests, objectives and characteristics or not of its customers, the Plan Provider should consider the level of information available to the customer and the degree of financial capability and literacy of the target market.
- The Plan Provider should also identify groups of customers for whom the funeral plan product is considered likely not to be aligned with their interests, objectives and characteristics.

### **Principle 6 – Skills, knowledge and expertise of personnel involved in designing and distributing funeral plan products**

- The Plan Provider should ensure that relevant personnel involved in designing funeral plan products possess the necessary skills, knowledge and expertise in order to properly understand the funeral plan product's main features and characteristics as well as the interests, objectives and characteristics of the target market.
- The Plan Provider should ensure that staff involved in distributing funeral plan products receive appropriate training to understand the characteristics and risks of the relevant products and the interests, objectives and characteristics of the target market.

### **Principle 7 – Funeral plan product monitoring**

- Once the funeral plan product is distributed, the Plan Provider should monitor on an ongoing basis that the funeral plan product continues to be aligned with the interests, objectives and characteristics of the target market.
- Where the Plan Provider offers guarantees in terms of service or delivery of particular financial benefits the product oversight and governance arrangements shall set out how these are reviewed and monitored to ensure that such guarantees can be met in the future.

### **Principle 8 – Remedial action**

- Should the Plan Provider identify, during the lifetime of a funeral plan product, circumstances which are related to the product and give rise to the risk of customer detriment, the Plan Provider should take appropriate action to mitigate the situation and prevent the re-occurrence of any detriment.
- If relevant, the Plan Provider should notify any relevant remedial action promptly to the distributors involved and to the customers.

### **Principle 9 – Oversight and governance of distribution channels**

- The Plan Provider should select distribution channels that are appropriate for the target market considering the particular characteristics of the product.
- The Plan Provider should select distributors with appropriate care.
- The Plan Provider should provide information, including the details of the funeral plan products to distributors, of an adequate standard, which is clear, precise and up-to-date.
- The Plan Provider should ensure that distribution channel staff involved in distributing funeral plan products receive appropriate and regular training to understand the characteristics and risks of the relevant products and the interests, objectives and characteristics of the potential consumer.
- The information given to distributors should be sufficient to enable them to:
  - understand and market the funeral plan product properly;
  - identify the consumer for which the funeral plan product is designed; and
  - identify the group of customers for whom the product is considered likely not to meet their interests, objectives and characteristics.
- The Plan Provider should take all reasonable steps to monitor that its distribution channels act in compliance with the objectives of the Plan Provider’s product oversight and governance arrangements.
- The Plan Provider should examine, on a regular basis, whether the funeral plan product is being marketed and distributed to customers appropriately.
- When the Plan Provider considers that the distribution channel does not meet the objectives of the Plan Provider’s product oversight and governance arrangements, the Plan Provider should take remedial actions against the distribution channel.
- The Plan Provider must disclose to the regulator, on an annual basis as a minimum and when required by the regulator at any other time, information regarding all distribution channels and distributors of the Plan Provider’s products.

### **Principle 10 – Outsourcing of funeral plan product design**

- The Plan Provider should retain full responsibility for compliance with product oversight and governance arrangements as described in these Principles when it designates a third party to design funeral plan products on their behalf.

### **Principle 11 – Documentation of funeral plan product governance and oversight arrangements**

- Relevant action taken by the Plan Provider in relation to the product oversight and governance arrangements should be duly documented, kept for audit purposes and made available to the regulator on request.

### Principle 12 – Financial promotions and marketing

- The Plan Provider’s product oversight and governance arrangements should set out its overall approach to financial promotions and marketing of its products.
- The Plan Provider must ensure that any marketing or advertising which they or their distribution channel undertakes does not bring the funeral planning industry into disrepute and that their marketing and advertising:
  - is always in good taste;
  - is legal, decent, honest and truthful and complies with all the other requirements of the Advertising Standards Authority’s Codes of Advertising Practice<sup>17</sup> or other relevant Code of Practice;
  - only contains third party endorsements or sponsorship which have been specifically approved by that third party; and
  - makes no unsubstantiated claims about funeral plans or services provided by other Plan Providers.
- The Plan Provider must ensure that a communication or a financial promotion is clear, fair, and not misleading. This includes communications or financial promotions carried out by the Plan Provider’s distribution channels.
- The Plan Provider must ensure that each communication and each financial promotion carried out by either the Plan Provider or by a Plan Provider’s distribution channel:
  - is clearly identifiable as such;
  - is accurate;
  - is balanced and, in particular, does not emphasise any potential benefits of a product or service without also giving a fair and prominent indication of any relevant risks;
  - is sufficient for, and presented in a way that is likely to be understood by, the average member of the target market to which it is directed, or by which it is likely to be received; and
  - does not disguise, omit, diminish or obscure important information, statements or warnings.
- In communicating information, Plan Providers should:
  - consider whether the omission of any relevant facts will result in the customer being given information which is not clear, fair and not misleading;
  - consider whether any comparison of products or services (whether or not provided by the Plan Provider) is fair and balanced;
  - use plain and intelligible language;
  - ensure the promotion or communication is easily legible (or for information given orally, clearly audible); and
  - specify the name of the firm making the communication and the Plan Provider on whose behalf it is being made.
- Where a Funeral Plan includes a guarantee or contribution relating to any of the costs of the funeral be they the funeral provider’s direct costs or third party costs such as; burial, crematoria, ministers fees etc. these should be disclosed in a transparent manner (clear, fair and not misleading) such that the customer is fully aware of the nature and extent of the guarantees and the guarantor. Plan Providers should disclose:

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<sup>17</sup> <https://www.asa.org.uk/codes-and-rulings/advertising-codes.html>

- the nature of the guarantee or contribution including how such a contribution rises with inflation (or other metric) and compared to historical funeral inflation rates;
- the guarantor – the Plan Provider or the Funeral Director.
- Plan Providers should communicate to plan holders when a Funeral Plan may not have sufficient funds to meet the benefits (particularly contribution benefits) provided under the plan.

### Principle 13 – Complaints and handling of complaints

- The Plan Provider’s product oversight and governance arrangements should set out its overall approach to the handling of complaints over its funeral plan products.
- Complaints should be defined as any oral or written expression of dissatisfaction, whether justified or not, in respect of a funeral plan product, from, or on behalf of, a person about any provision of, or failure to provide, which:
  - alleges that the complainant has suffered (or may suffer) financial loss, material distress or material inconvenience; and
  - relates to an activity of the Plan Provider, or of any distribution channel with whom that Plan Provider has some connection in marketing funeral plan products.
- To aid customer awareness of the complaints protections offered, Plan Providers must:
  - publish appropriate information regarding their internal procedures for the reasonable and prompt handling of complaints;
  - refer complainants to the availability of this information;
  - provide such information in writing and free of charge to complainants:
    - a) on request; and
    - b) when acknowledging a complaint.
  - provide information to complainants, in a clear, comprehensible and easily accessible way, about the regulators arbitration service including the regulator's website address:
    - a) on the respondent's website, where one exists; and
    - b) if applicable, in the general conditions of the Plan Provider's contract.
- All Plan Providers must participate in a mandatory designated Alternative Dispute Resolution (ADR) scheme to provide redress for consumers when things go wrong.
- This accredited single ADR scheme should be appointed and managed by the regulator.

### Principle 14 – Funeral plan contracts and documentation

- The Plan Provider’s product oversight and governance arrangements should set out its overall approach to the provision of contract documentation and continuing review of that documentation.
- Plan Providers must give every person who buys a funeral plan a written contract which sets out, at a minimum:
  - the plan’s terms and conditions and, in particular, the specification of the funeral to be provided and how the funeral plan may be amended or cancelled;
  - a membership card or certificate of entitlement;
  - the responsibility of the Plan Provider as guarantor of the funeral plan and where that plan has been allocated to a specific Funeral Director the name of that Funeral Director; and
  - written guidance on how to register a death.

- Plan Provider must enter into an appropriate contract with the Funeral Director where a funeral plan has been allocated to a specific Funeral Director either at the time of sale or afterwards which recognises the respective responsibilities financial and provision of service responsibilities of the Plan Provider and the Funeral Director.
- Plan Providers should provide for appropriate (and not excessive) cancellation or other administrative charges in terms of cancellation of or changes to a plan.

### Principle 15 – Consumer protection

- The existing FPA Rules and Code of Practice includes the following “Pledge to Customers”, although the organisation is currently seeking to strengthen this position including exploring alternative protective mechanisms :

“All Plan Providers shall co-operate in the delivery of the Authority’s “Pledge to Customers” by which, in the event of the insolvency of a Plan Provider, the other Plan Providers will examine ways in which the Authority might assist in arranging delivery of the funeral of the customers of the insolvent Plan Provider. The extent of this co-operation will be at the discretion of the individual Plan Providers.”

- Consideration should be given by the regulator to strengthening the “Pledge to Customers” through a guaranteed form of backstop protection to protect consumers in case of a Plan Provider or related trust insolvency or failure.
- Consideration should be given by the regulator as to how funeral plan products funds can be best protected (i.e. through a mechanism that provides the benefits of say a Financial Services Compensation Scheme (FSCS)<sup>18</sup> funded by a levy on Plan Providers or perhaps through the sector-wide provision of a credit insurance policy).

## 9. What should the prudential rules include?

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### Outline of current prudential regulation

Funeral plans can be provided either under trust-based or insurance-based contracts.

Where a funeral plan is provided under an insurance-based contract (a whole of life plan) the plan is exempt from FCA regulation, but the financial instrument (whole of life plan) is provided by an organisation with approved persons supervised and regulated by both the PRA and FCA with the PRA regulating the solvency of the insurance-based provider or insurance company, including its funeral plan activity, as part of the overall solvency requirements for the business as a whole.

These whole of life policyholders therefore will typically have the same solvency protection as provided to any insurance policyholder within the UK. This protection is covered by the rules and regulations of the PRA, which includes both actuarial estimates of the liability cash flows relating to a group of

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<sup>18</sup> <https://www.fscs.org.uk/what-we-cover/about-us/>

products and the provision of a risk margin over and above the best estimate liabilities in computing the minimum necessary capitalisation required to be authorised. However, one could question who reviews the plan (the regulated provider, or the Plan Provider?) and for what liability (ability to meet a defined sum assured, or the services committed in a funeral plan contract?), and, from a transparency point of view, should the adequacy of funds supporting whole of life plans be made available for inspection in the same way that Trust based plans are.

Trust-based funeral plan arrangements legally require, under the Financial Services and Markets Act (Regulated Activities) Order 2001 (RAO)<sup>19</sup>, for a Fellow of the Institute and Faculty of Actuaries (IFoA)<sup>20</sup> to determine, calculate and verify the assets and liabilities (the Valuation) of the pre-paid Funeral Plan Trust every three years. The trustees of the trust are also subject to trust law.

The FPA requires (Rule 4.3.10.2<sup>21</sup>) that members of the FPA operating trust based plans to carry out annually a Valuation of the assets and liabilities of the trust by an actuary who is a Fellow of the IFoA, in accordance with the Financial Reporting Council's Funeral Plans Technical Actuarial Standard (TAS 400)<sup>22</sup>. The IFoA has a professional standard (APSZ1) which sets out the duties and responsibilities of the reporting actuary. In carrying out such work the actuary is required to explain in his report the reasons for failing to do so.

The IFoA, to further support its members that carry out work under the Funeral Plans TAS, also publishes guidance for both the actuaries<sup>23</sup> and the trustees<sup>24</sup> of funeral plans. These cover the funeral plan market, the role of the trustee and of the actuary in the valuation of the assets and liabilities of the Trust.

The FPA requires in its Rules for its members to submit to the FPA the annual Valuation and the FPA through its Compliance Committee reviews and monitors the solvency of plans of its registered providers. The FPA's activities also include ensuring that its registered providers operating trust-based funeral plans are setting up trust's that meet the requirements of the RAO and the FPA rules prior to becoming registered providers of the FPA.

A key concern of the FPA in its monitoring activity is in relation to the recognition of any 'guarantees' included in a funeral plan product and the extent to which these are recognised in the annual valuations carried out by the actuaries. These guarantees are often over third party costs and are subject to differing rates of inflation to other elements of the services provided under the funeral plan. The Actuarial Guidance does reference this as issues for actuaries to understand in carrying out their work in determining their valuations of the assets and liabilities of the Trust.

### Limitations of the current prudential regulation

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<sup>19</sup> <http://www.legislation.gov.uk/uksi/2001/544/contents/made>

<sup>20</sup> <https://www.actuaries.org.uk/>

<sup>21</sup> <https://funeralplanningauthority.co.uk/regulations/rules/>

<sup>22</sup> <https://frc.org.uk/getattachment/62eac586-5da3-4fdb-8dcb-d15396b179b3/TAS-400-Funeral-plan-trusts-Dec-2016.pdf>

<sup>23</sup> <https://www.actuaries.org.uk/upholding-standards/standards-and-guidance/non-mandatory-guidance>

<sup>24</sup> <https://www.actuaries.org.uk/upholding-standards/standards-and-guidance/non-mandatory-guidance>

The major limitation of the current prudential regulation may be identified as transparency of “funeral solvency” of whole of life plans (despite a degree of consumer protection that comes from a regulated provider) and a lack of third party or statutory regulatory scrutiny and enforcement of the solvency of all Plan Providers who use trust-based plans. In particular, this will apply to Plan Providers who are not members of the FPA because there is no independent oversight of the solvency of the plans apart from their actuary and their mandatory peer reviewer, notwithstanding that the valuations are subject to the provisions of the IFoA on its members.

This would be overcome if there was a compulsory statutory regulator responsible for:

- Overseeing the minimum and appropriate requirements that should apply across all products whether whole of life or for setting up a trust-based plan including the wording of the Trust Deed and the rights to surpluses held in the Trust (as set out in the FPA’s current Rule book); and
- Ongoing monitoring of the valuations of all plans whether whole of life plans or trust-based plans to ensure trustees and regulated providers are adequately measuring and taking appropriate actions in terms of their ability to meet liabilities.
- A common understanding of the difference between “retail” and “wholesale” funeral costs, and the various moving parts within the product that give rise to financial and prudential risks:
  - Product guarantees including indexation and escalation rates of “contributions”, and who is providing the guarantee (the plan provider or the funeral director)
  - Tests for sensitivity analysis (understanding the impact of how certain costs may rise at or above inflation or indeed funeral inflation)

Another limitation of the current prudential rules for plans is the lack of an agreed solvency margin or minimum margin of solvency required to be held within all plans to provide a capital buffer if the valuation assumptions made by the trustees and/or actuaries are found to be unrealistic or inaccurate leading to insolvency or capital inadequacy of a Plan Provider.

### Future of prudential regulation of the funeral plan sector

To address the limitations noted above the following proposals are being made:

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| <b>Lack of a solvency margin</b> | <p>The regulator should establish rules for a minimum solvency margin to be held by Plan Providers. There are a number of different models that could be used to establish such a margin. For instance:</p> <ul style="list-style-type: none"><li>• The regulator could introduce a simple requirement that the minimum solvency be a minimum amount per undrawn plan at the fund valuation date. The regulator would set the minimum amount which would rise or fall as determined by an agreed index of inflation. There should be consideration of wholesale pricing, different plan types (such as direct cremation), outstanding instalments and regional variations.</li></ul> |
|----------------------------------|--|

This approach has the potential of being relatively straightforward.

- The regulator might require a risk margin or capital buffer to be carried over and above the actuarial valuation of the trust's liabilities. The risk margin might be calculated on a cost of capital basis as part of the actuarial valuation (as required for current insurers subject to regulation under the Solvency II Directive). This would need to be defined by the regulator.

This approach effectively requires a margin over the best estimate of liabilities which is meant to represent the risk premium that might be charged by a third party taking on the liabilities of the trust.

This approach is less simplistic but has the advantage of providing a minimum capital buffer over and above the current best estimate of the liabilities of the trust.

Establishing rules for a minimum solvency margin is likely to be relatively complex, however these are two potential options to be explored. The regulator would need to consider the differences between the insurance and trust based models as part of this process.

### **Lack of transparency over the solvency of trust-based plans**

The regulator should establish rules requiring all plans annual Valuations to be published on the website of the Plan Provider within (say) three months of the valuation date such that the transparency over the Plan Providers is improved.

The regulator should be required to publish on their own web-site the Valuation where a Plan Provider fails to do so.

These rules are akin to the Solvency II Directive requirement for all UK insurers to produce an annual public Solvency & Financial Condition Report. The regulator should take steps to ensure that these are applied proportionately.

### **Ongoing monitoring of the solvency of funeral plans**

The regulator should be charged with:

- overseeing the minimum and appropriate requirements that should apply across all products whether whole of life or for setting up a trust-based plan including the wording of the Trust Deed and the rights to surpluses held in the Trust; and
- overseeing, monitoring and assessing the solvency of the Plan Providers trusts and whole of life arrangements. The regulator should have appropriate powers of intervention where it has concerns over the solvency of the funds being accumulated to meet future commitments under funeral plans.
- finding alignment with Plan Providers to provide a widely accepted means of dealing with a situation that deals with the scenario where a provider no longer exists, whether this is FSCS, or PPF.

### 10. Acknowledgments

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This white paper has been written and developed by Dignity. The views and perspectives set out in this paper are Dignity's. However, Dignity recognises the contribution of a number of participants in the funeral plan market with significant expertise and experience, who have provided insights throughout the process.

This paper also benefitted from the regulatory expertise and insight provided by Charles Portsmouth of Moore Stephens. WA Comms supported with policy expertise throughout this process.

#### **About Dignity**

Dignity is a British company that has funeral homes and crematoria in towns and cities across the UK. The business also has a strong market presence in pre-arranged funeral plans, where people plan and pay for their funeral in advance.

Dignity Funeral Directors operate at the high end of the funeral market and provide excellent client service and facilities to care for the deceased. Dignity is the first company in the UK to be awarded the BSI Kitemark for Customer Service for its funeral planning business. Dignity has some of the best rated funeral plan products according to Fairer Finance and their Diamond funeral plan was recently awarded a five star Defaqto rating.

Dignity has been leading the public debate on the need for stronger regulation of funeral plans, having worked in partnership with Fairer Finance to undertake the first major piece of research into the market.

Simon Cox is Head of Insight and External Affairs at Dignity. One of the UK's leading authorities on funeral research he has been responsible for commissioning a wide range of research projects across a range of funeral and bereavement topics including the creation of the UK's market leading annual reports into funeral costs. Simon also sits on various funeral working groups in Westminster and Holyrood.

#### **About Moore Stephens**

Moore Stephens is a top ten accounting and advisory network, with offices throughout the UK and members across the globe. The Moore Stephens award winning Regulatory Consultancy team helps businesses anticipate and adapt in an ever changing regulatory climate. The team provides consultative problem solving together with core compliance services to meet all of their clients' regulatory needs.

The team specialise in helping clients meet the requirements of both UK and European regulation, while also providing specialist insight into some areas of global legislation. The Moore Stephens Regulatory Consultancy team aims to ensure that not only can its clients embrace regulation and manage the impacts of regulatory change, but strives to be a trusted advisor who can be relied upon to add value, provide challenge and deliver a service which will facilitate businesses in having a safe and sustainable future.

Charles Portsmouth is a Director in the Moore Stephens Governance Risk & Assurance Group based in London. He specialises in providing governance, risk and regulatory consultancy services and advice to financial services firms with an emphasis on the insurance sector.

## Strengthening regulation in the funeral plan sector



### **About WA**

WA is the agency of choice for clients with complex public affairs and strategic communications challenges. WA develops and protects clients' reputation, informs the policy debate and helps clients get up to speed quickly on the external issues and stakeholders that matter. WA provides public affairs support to Dignity.

Angus Hill is an Account Director at WA. He runs public affairs programmes in a broad range of sectors with a particular interest in consumer focused policy issues.

### **Contact**

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