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## **PAYMENT OF FEES TO THIRD PARTIES (DISBURSEMENTS)**

The ongoing investigation into the funeral sector by the Competition and Markets Authority (CMA) may well lead to formal regulation of the funeral sector, and will inevitably lead to greater scrutiny from both the public and professionals. We believe that one area that may well be investigated is the payments we make to third party 'suppliers', which are frequently without an invoice. Many churches, hospitals and doctors' surgeries have foreseen this and now send us an invoice for fees, which gives us a clear paper trail and also gives them an audit trail.

We have decided that from 1st April 2019, we will require all 'suppliers' to send us invoices in order for fees to be paid. Invoices will need to be on recognisable letterheads and can be either e-mailed or posted to us. All invoices will be paid by BACS transfer (not cheque) to ensure funds are received and cleared in a timely fashion. We regret that if an invoice is not received we will be unable to make payment, and if an invoice is not received within two weeks of a funeral taking place, the funds which we have collected from our client will be returned to the client. Our preference will be to receive an invoice as soon as the funeral is arranged so that we can ensure the correct fees are collected on your behalf from our client.

Whilst we understand that this will involve additional administration, we are sure you will appreciate our stance on this. We need to be open. At worst, the implication of any non-invoiced payment is that the money will not be declared to HMRC. As a business we need to ensure that we are operating openly, and we believe this system will make all parties less susceptible to criticism.

If you have any questions about any of the above, please do not hesitate to contact us and we will be happy to explain anything further.

March 2019