

INQUIRY INTO FUNERAL INDUSTRY

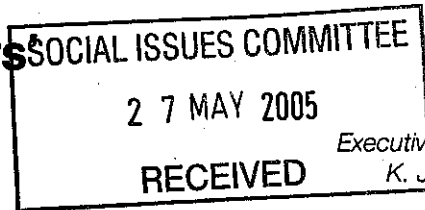
Organisation: The Funeral Directors' Association of NSW Ltd
Name: Mr K J Chapman
Position: Executive Secretary
Telephone: 9651 1444
Date Received: 27/05/2005

Theme:

Summary



The Funeral Directors Association of N.S.W. Ltd.
ABN 46 978 571 730



25th May 2005.

PRECIS OF THE SUBMISSION TO THE PARLIAMENTARY INQUIRY INTO THE FUNERAL INDUSTRY

The Funeral directors Association of New South Wales is the pre eminent funeral employer organization in New South Wales having a membership of 106 funeral directing companies and 30 companies that provide services to the industry. All members companies are fully Australian owned and family operated and represent small to medium companies in most parts of the State.

We have no connection with the Australian Funeral Directors Association.

There have been many instances of unsatisfactory practices in the industry and the Association is concerned about the proliferation of unprofessional and untrained people entering the industry. There are no licensing requirements and little legislation to cover the industry.

It is not the intention of the Association to prevent or make it difficult for new entrants into the industry. Competition is welcomed provided the participants offer the public a proper level of service and their practices are professional and ethical.

Two previous inquiries over the last thirty years have all found that although the price of funerals has risen more than the CPI there was no evidence to indicate that the rise was reflected in profits to the funeral directors. The main issues identified as being responsible for the increases above the CPI were the increase in the costs of cremation and burial sites and interment fees and other costs over which the funeral director has no control.

A survey conducted through our membership has disclosed that the average price of a burial has risen in the last decade by 67% whilst a cremation has increased 36%. The CPI has increased 28.6% during that period. The high rise in burial costs in that period is attributed solely to the issues previously mentioned and the introduction of the GST.

With no formal licensing or training necessary to become a funeral director any person with little or no experience can call themselves a funeral director and set up business providing they conform to the few regulations under the Health Act.

In the absence of formal licensing, it is considered that in the interests of the public, all funeral directors should be obliged to comply with a compulsory code of conduct.

Accordingly, the Association fully supports recommendations made in December 2004 to the Health Minister by the Funeral Industry Council for a system of compulsory compliance. Under this scheme, which would be administered at no cost to the Government by the Funeral Industry Council funeral directors who did not comply would be denied access to cemeteries and crematoria.

In 2004 the previous Health Minister Craig Knowles recognized the need for more control in the industry including a negative licensing system, but nothing was done except make minor changes to the Health Regulations. This action has had no effect on the continuance of mal practice in the industry.

Our conclusions are:

- There is a need for further legislative changes in the funeral industry.
- The submission of the FIC to the Health Minister for a compliance scheme should be accepted.
- The scheme should be administered by the FIC if a Government authority will not run the system.
- Increased funeral costs over the past 10 years have been caused mainly by the increases in the cost of burial sites and the GST.
- The Funeral Industry Council should remain in its existing structure.

The Funeral Directors Association of New South Wales Ltd.

SUBMISSION TO THE STANDING COMMITTEE ON SOCIAL
ISSUES INQUIRY INTO THE FUNERAL INDUSTRY.

1.

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1. INTRODUCTION.

The Funeral Directors' Association of New South Wales Limited is an incorporated body and is the pre eminent funeral employer organization in New South Wales having a membership of 106 funeral companies and 30 Industry Members. Its members conduct in excess of 15,000 of the 43,000 funerals each year in the state.

All member companies are fully Australian owned and family operated and represent medium to small companies in most parts of the State.

The funeral industry is not a large one and it is estimated that there are less than 200 companies operating in the State. Companies that trade under several different names inflate the apparent number of funeral directors to over twice this figure.

The greater majority of funeral directors are members of the Funeral Directors Association of New South Wales or the Australian Funeral Directors Association. The two organizations have no connection. There are however, a number of operators who are non aligned – some because they choose to remain outside such organizations and others who do not meet standards to be accepted into the Associations, lacking either satisfactory premises and/or vehicles or are lacking the experience, professionalism or ethics to gain membership. It is estimated that there are 40 to 50 companies that fall into this category.

To be accepted as a member of the Association funeral companies must have satisfactory premises and vehicles and must have their own mortuary. They must demonstrate that they have operated successfully for at least twelve months as a funeral company and have proven business experience. Their ethics must be exceptional.

When accepted to the Association all members are required to conform to a Code of Ethics (See Annexure 1). Failure to comply with this code or the committing of serious breaches of conduct will mean the member can be censured or dismissed from the Association. Over the years, a number of members have failed to live up to the standards set and their membership has been discontinued.

The Association provides industrial advice and assistance to members in many forms and keeps them in touch with changes in the funeral industry and industrial matters in general.

The Association is governed by a State Committee consisting of a President, Vice President and nine members of committee. The Executive Secretary carries out administrative and member liaison services for the Association.

The Association is a member of the Funeral Industry Council and actively and financially supports that organisation.

The Association is widely recognized by the media as the prime industry body in the State and is called on for comment on most controversial issues that arise concerning the industry.

2. ASSOCIATION'S POSITION

The Association welcomes the inquiry as it has called for tighter control of the industry for many years both as an individual organization and as part of the Funeral Industry Council.

There have been many instances of unsatisfactory practices which have come to notice and the Association has notified the Department of Health and when appropriate, the Department of Fair Trading and other authorities. In recent years the Funeral Industry Council has become the appropriate forum for examining serious complaints and referring them to the appropriate area.

Complaints received regarding members of the Association are dealt with by way of a formal complaints procedure (See Annexure 2) Such inquiries are generally of a minor nature involving disputes over accounts or perceived indiscretions by the funeral director. These are dealt with swiftly and negotiations between the complainant and the funeral director are usually successful.

The few serious complaints received have mostly resulted in termination of Association membership.

The Association has been concerned for many years about the proliferation of unprofessional and untrained people entering the industry. There are no requirements apart from Health Regulations in relation to the handling of bodies and Local Government Regulations in relation to premises. Members of the public cannot in many cases determine whether or not a funeral director is professional or ethical or has proper premises and skills for the caring of a body.

Studies conducted by the Association clearly indicate that price increases in funerals have been largely attributable to increases in payments made by funeral directors on behalf of their clients (external costs) e.g cemetery fees, cremation fees and GST.

It is not the intention of the Association to prevent or make it difficult for new entrants into the industry. Competition is welcomed provided the participants offer the public a proper level of service and their practices are professional and ethical.

3. COMMENTS ON TERMS OF REFERENCE

(a) **Changes in the funeral industry over the past decade including the cost of funerals, the degree of competition, vertical integration and ownership**

The Committee will be aware that there have been two previous inquiries into the funeral industry in the past three decades.

In 1977 the New South Wales Prices Commission conducted an inquiry which estimated the average cost of a cremation to be \$872.00 and the average price of a burial to be \$1120.00. Funeral directors service fees were estimated to be an average of \$400.00.

A recommendation was made for the establishment of a body to, amongst other things, license funeral directors, monitor prices and review cemetery and crematoria fees. These recommendations were not acted upon.

In 1992 the Federal Prices Surveillance Authority conducted an extensive survey into funeral prices throughout Australia.

The Authority found that the average price of funerals had increased at a rate greater than the CPI. In the years between 1988 and 1990/91 the average price of a funeral rose by 10.3% compared with an increase in the CPI of 5.3%. **The Authority found however that the increase was not reflected in increased profits for funeral directors.** Rather, the main reason for the real increase in funeral prices had been the cost of providing the increased services requested of funeral directors. The authority cited one reason for the increase in service in the average funeral to be an increasing proportion of people from non Anglo-Saxon descent demanding more elaborate funerals.

Funeral directors had also responded to the demand of better service by providing such things as improved chapels, grief counseling, better quality vehicles and premises and refreshments after the ceremony.

The Authority recommended that funeral directors adjust their pricing practices so that the price of each service offered accurately reflects the cost of providing that service and that a well defined essential care funeral should be offered

It was estimated that the average price of a funeral in 1990/91 was \$3102.00 which was 10.3% more than the previous year and 67.2% more than five years earlier. The comparable increases in the CPI were 5.3% and 43.2% respectively.

The average service fee ranged from \$1092 for a small firm to \$1624 for a large firm.

Service fees now have an average range from about \$ 1500 for a small firm to \$2300.00 for a large firm increases of 37% and 41.6% respectively.

Some of the issues identified as being responsible for the increases above the CPI were the increase in the cost of cremation and burial sites and interment fee and other costs over which the funeral director has no control.

It was concluded by the Authority that there was no indication that profits in the funeral directing industry were either low or excessive.

A survey has been conducted of our members and from a response of 60 funeral directors or 55% of our membership (Annexure 3) it has been established that average cost of a burial has risen from \$2908.00 in 1994 to \$4866.00 in 2004, an increase of about 67%. Cremation costs averaged \$2882.00 in 1994 and \$3920.00 in 2004, an increase of around 36%.

It must be emphasized that over 80% of our membership are country funeral directors and cemetery costs in country areas are considerable less than in the Sydney Metropolitan area. The average costs associated with burials such as the purchase of right of burial and interment fees have risen from an average of \$2377.00 in 1994 to an average of \$3702 in 2004 or about 65%.

A matter of contention throughout the years has been the funeral directors service fee. The fee is set to cover the following fixed costs of a funeral business:

The availability of the funeral director at any hour, day and night, providing trained personnel, advice and services, liaising with cemeteries, crematoria, clergy, newspapers, florists etc to provide the services required. It also provides for the use of a hearse and one car and appropriate labour costs as stipulated by the industrial award or enterprise agreement.

It must also proportionately recoup the director's administrative expenses such as rent or mortgage on premises, salaries and wages (including holiday, long service leave, sickness and workers compensation obligations and compulsory superannuation) rates and taxes, motor vehicle expenses, telephone, light and gas, insurances, including workers compensation, general, public liability and motor vehicle, depreciation, repairs and maintenance etc., costs associated with administration including a computer system, phones and fax systems, printing, stationary, furniture and equipment. Uniforms including protective and wet weather clothing are also provided for staff.

Of course there must be a comparable return on the very considerable capital outlay and demands of the business.

Like all businesses, costs have increased considerably over the past ten years particularly in the area of insurances and the necessity to make special provision for the increased

emphasis placed on occupational health and safety and compliance with Workcover requirements.

Sample accounts have been prepared (Annexures 4 & 5) based on the current average price of a cremation and burial, on figures supplied by our membership.

The introduction of the GST which applies to all aspects of the funeral industry has had a major bearing in the increase in costs.

(b) The availability and affordability of burial spaces and options for increasing the supply of spaces.

Our members have no control over the availability of burial spaces. The Association is aware that land for burials is diminishing but to our knowledge, no plans have been made to set aside land for use as one or more cemeteries in any area within the County of Cumberland.

Cemetery costs are the single largest factor in the increased cost of funerals. The funeral director generally pays for the site and/or interment fee and includes those costs in his account as an expense paid on behalf of his client, adding to the overall total of the bill. It should be noted that 'cemetery fees' can and may include any of the following: cost of right of burial (commonly referred to as 'ownership'), first interment fee, second interment fee, headstone, plaque, inscription etc. As recently as May 2005, one Sydney cemetery has included in its pricing structure (effective June 1, 2005) penalty fees of \$710 and \$770 (excl GST) for 'insufficient notice' of burial.

Most cemeteries are owned and /or controlled by trusts, private companies and councils. Many cemetery owners and trusts increase their costs well above the CPI and some have doubled their charges on a regular basis. For example, a large Sydney Cemetery controlled by several trusts has shown increases in right of burial costs of an average of 171.5%, first interment fees of 215.7% and second interment fees of 116.5%. A smaller Sydney Cemetery, again controlled by several trusts shows average increases of 162% for right of burial and 175% for interment fees (monumental section) and an increase of 47.4% for combined fees in the lawn section. The cost of right of burial ranges from a few hundred dollars in some country centres to several thousand dollars in some metropolitan cemeteries. Above ground crypts can be as much as \$15,000.00 for a single space and \$30,000.00 for a double space. These organizations are business concerns and there is little that can be done to lower prices in this area.

It is again stressed that the high price of cemetery costs apply mainly to the Sydney metropolitan area.

Inquiries from Australian Bureau of Statistics reveal that in the past decade the CPI Index has increased by 28.6%

Similar to the finding by the Federal Prices surveillance Authority in 1992 it is believed that the current increase in the price of funerals although greater than the CPI does not reflect increased profits for funeral directors.

The funeral director's own charges have not increased greatly but the accounts sent to a client which include items paid on the clients behalf, may give the impression that the funeral director is making considerably more from a funeral than he really does.

(c) The adequacy of existing regulation of the funeral industry to protect consumers, public health and employees.

The funeral operates under the Public Health (Disposal of Bodies) Regulation 2002. This covers only the handling of bodies, premises and vehicles for handling of bodies, approvals to cremate and exhumations. The Local government (Orders) Regulation 1999 No. 462 provides standards for mortuaries.

There is no formal licencing necessary to become a funeral director and virtually any person with little or no experience can call themselves a funeral director and set up in business provided they conform with the abovementioned regulations.

This has permitted the proliferation of inexperienced and ill equipped persons entering the industry, many of whom have questionable ethics and little or no business experience. They are referred to as "backyard" operators and in many cases have no premises or vehicles.

There have been many instances of unprofessional and unethical behaviour including breaches of the Health Regulations but there have been very few successful prosecutions. Even when a prosecution is successful, the funeral director concerned continues operating frequently in the same manner as before.

It is understood that many of the more unscrupulous operators have no workers' compensation insurance and do not conform to O H & S or Workcover legislation.

It is considered that in the interest of the public, all funeral directors should be obliged to comply with a code of conduct. A system of licencing would be preferred but compulsory adherence to a code of conduct is considered essential.

The Funeral Industry Council recommended to the Minister for Health in December last year that such a scheme be introduced and operated by the FIC at no cost to Government.

This Association believes that the scheme proposed by the Funeral Industry Council for compliance should be introduced. It would necessitate a change in legislation to prevent non complying funeral directors from using cemetery and crematorium facilities.

We refer to statements made by the then Minister for Health, Craig Knowles in October 2002 (in response to a prior Funeral Industry Council submission) which stated;

“I am satisfied that there is sufficient public interest and concern over funerals and associated practices for there to be appropriate regulation in the industry”

He also indicated in a press release that a system of negative licencing would be introduced and that regular and serious offenders would be removed from the industry.

Apart from minor changes to the Health Regulations nothing further was done in relation to regulating the industry.

(d) The role and structure of the Funeral Industry Council

The Association supports fully the current role and structure of the Funeral Industry Council.

The Funeral Industry Council has representation from all facets of the funeral industry and from Government Departments with an interest in the industry. Consumer representation is also present on the Council.

The Funeral Industry Council is seen to be an essential group, acting as a peak body in the industry and has taken up issues that effect the industry as a whole including creating minimum standards for coffins, cardboard coffin testing, establishing carrying devices for the industry and formulating policy based on legal advice on various occupational health and safety matters. **There is no other industry body group who can deal with issues that effect the whole industry.**

The Council also receives and acts on complaints in the industry. This is particularly necessary when firms complained of are not members of either of the two industry associations and therefore cannot be disciplined.

As the Government has shown a reluctance to be the controlling body of the industry, the Association sees the Council as the logical body to operate the compliance scheme recommended to the Government and should be seriously considered to control any other system of that may emanate from this inquiry.

(e) The adequacy of legislation in meeting community needs.

The current Health regulations seem adequate for the safety of the community providing they are followed by all in the industry.

In 1987 as a result of a dispute between the Association and the Funeral and Allied Industries Union a Compulsory Conference took place before Conciliation Commissioner Cross.

The dispute related to lack of appropriate regulations and the enforcement of existing regulations relating to the welfare, safety and protection of employees in the funeral industry.

Commissioner Cross's recommendations included a licencing system, in the public interest which indicated that in addition to the statutory and building requirements, requirements in the following areas of activity and expertise should be established and maintained:

Adopt an approved code of ethics approved by the Department of Consumer Affairs and the Trade Practices Commission.

Make available in printed form with precise description of the merchandise available and the practice thereof

Show proof that a workers compensation insurance policy is currently in place

Own or operate at least one hearse and one removal vehicle approved to carry deceased persons.

A licensing system was introduced following the report but was later repealed by the Government.

It is relevant to note that in 1987 many of the same concerns were being expressed regarding the safety and conduct of the funeral industry. Commissioner Cross's recommendations set out above are not unlike those proposed by the Funeral Industry Council in its report to the Minister for Health. The only variation is that the present recommendation asks for obligatory compliance to an approved code of conduct.

The Funeral Industry Council in its submission to the Minister for Health highlighted a number of unsatisfactory and unsavoury incidents that occurred in the funeral industry. Many of these are contained in a Four Corners report titled "The coffin chasers" A copy of this documentary is attached.

The Association believes that there needs to be regulations to prevent the continuance of similar occurrences and recommends that Craig Knowles' 2002 commitment to exclude serious and repeat offenders from the industry should apply.

Changes in the regulations as recommended by the Funeral Industry Council to prevent such offenders utilizing cemeteries and crematoria would provide this avenue.

(f) Any other relevant matters.

There is a need for enforcement activity outside of the Health regulations. An example is the advertising of Melbourne firm, Bells Funerals whose advertisements under a multitude of different names and phone numbers occupy the first nine pages of the 'Funeral Directors' category in the Sydney Yellow Pages phone directory. Phone calls to any of the numbers reach the same operator in Melbourne.

Bells funerals have no premises in Sydney. They sub contract funerals arranged from Melbourne to a Sydney operator.

People of Sydney are being duped into believing that they are dealing with a reputable Sydney funeral director when in fact they are not aware of who will be performing the funeral or whether or not that funeral director is reputable.

This is obviously a matter for the attention of the Department of Fair Trading.

There are also instances of some funeral directors using funds collected for pre paid funerals rather than complying with the law and placing the funds with a friendly society. This is a further matter for consideration by the Department of Fair Trading.

4. CONCLUSIONS

- There is a need for further legislative changes in the funeral industry.
- The submission of the Funeral Industry Council for a compliance scheme should be accepted and introduced.
- The scheme should be administered by the Funeral Industry Council if the Department of Health or other government authority will not run the system.
- Increases in funeral costs over the past ten years have been caused mainly by increases in the cost of burials and cremation costs. The introduction of GST in 2000 has also impacted on overall costs.
- The Funeral Industry Council should remain in its existing structure.

Members of the Management Committee of the Association would be happy to appear before the inquiry to enlarge on this submission and answer any questions.

J. Phillips
President

K.J. Chapman
Executive Secretary

5. BIBLIOGRAPHY

- (a) NSW PRICES COMMISSION – 1977 Inquiry into the Funeral Industry of New South Wales – Chairman Robert Evans S.M., Commissioners Carolyn Davidson, B.A (Hons) Gordon Tickle.

- (b) AUSTRALIAN GOVERNMENT PRICES SURVELLANCE AUTHORITY – INVESTIGATION INTO FUNERAL PRICES - 1991. – A.H.M. Fells, Chairman.

- (c) COMPULSORY CONFERENCE BEFORE CONCILIATION COMMISSIONER CROSS – 1987.

ANNEXURE 1.

Members of this association subscribe to the following code:—

Code of Ethics

- To maintain in all matters the highest standards of business, professional and personal conduct.
- To respect in all circumstances the confidentiality and trust of clients.
- To ensure that staff is qualified and competent.
- To ensure that facilities are adequate for all services rendered.
- To provide information concerning the range of services available; the prices of the services and the functions and responsibilities accepted.
- To give a written estimate of all funeral charges and disbursements to be made on a client's behalf at the time of taking instructions, or as soon as practicable.
- To respect personal choice and have regard for diversity of beliefs in religious and cultural practices.
- To ensure that all advertising is genuinely informative and in good taste.
- To be thoroughly conversant with the laws of the land as they apply to funeral service and allied industries and professions.
- To provide an advisory service with conciliation and arbitration arrangements available to help resolve disputes which may arise between members and their clients.

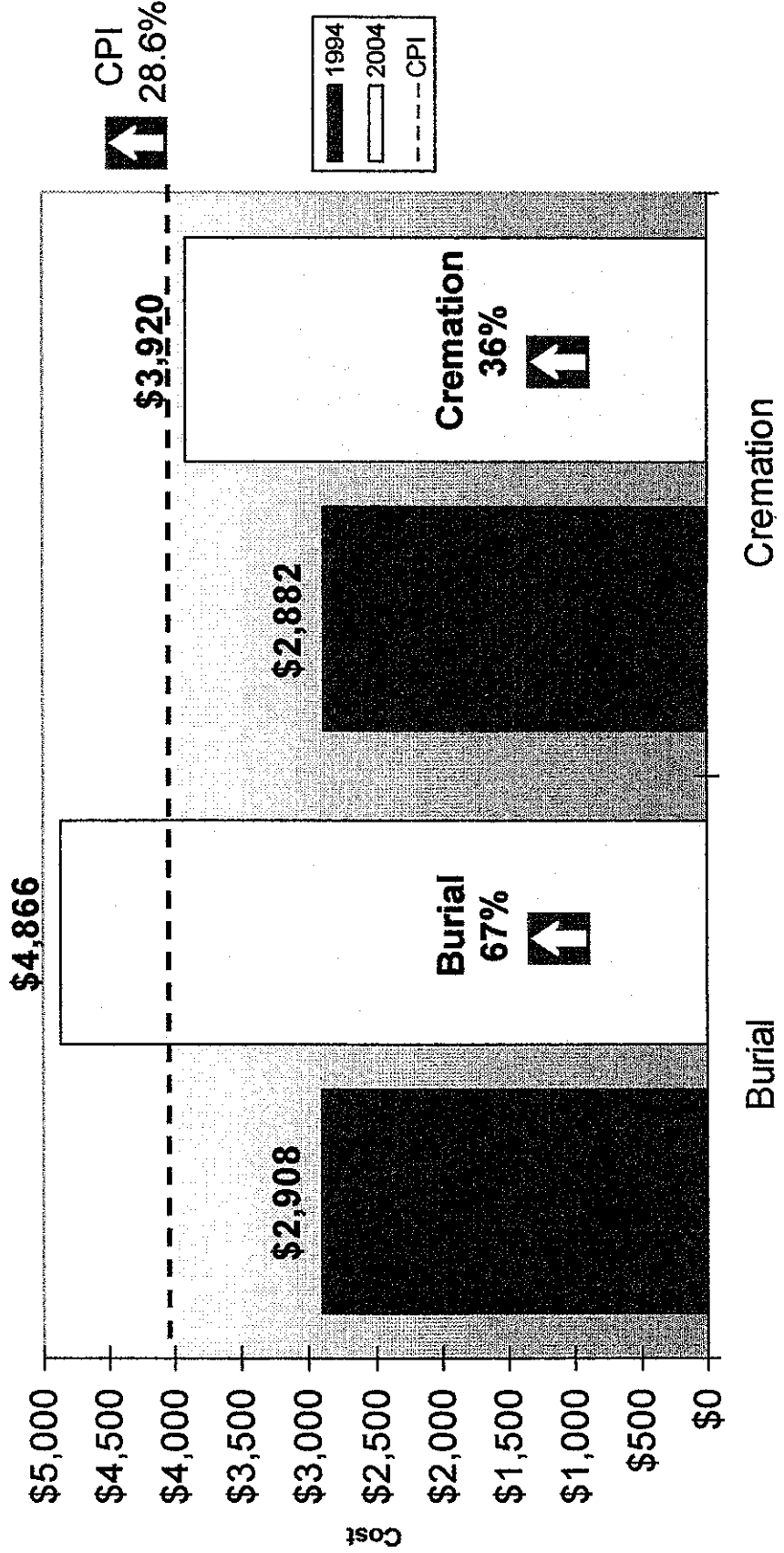


ANNEXURE 2

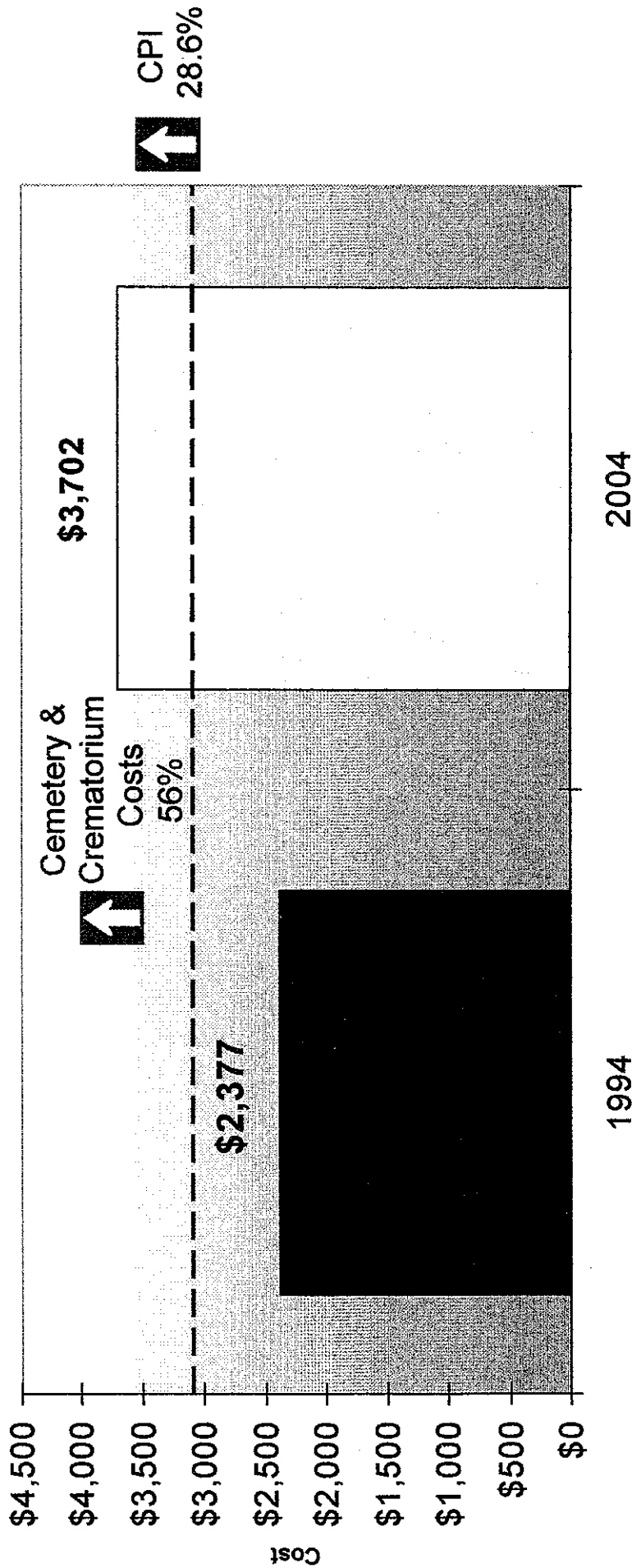
THE FUNERAL DIRECTORS' ASSOCIATION
OF NEW SOUTH WALES LIMITED
A.B.N. 46 978 571 730

COMPLAINTS RESOLUTION POLICY

Average Funeral Directors Charges for Burials and Cremations 1994 vs 2004



Average Cemetery & Crematorium Costs & CPI 1994 vs 2004



ANNEXURE 2

This Policy should be read in conjunction with The Association Rules. Definitions appearing in The Association Rules also apply to this policy.

INTRODUCTION

As a professional association committed to ensuring both it and its members fully embrace and follow "industry best practice", a procedure is required to address complaints made against either:

- The Association itself;
- A Committee Member or Members;
- An Employee or Employees of The Association;
- A Member or Members.

The procedure must be fair to all concerned, and be seen to be fair to all concerned.

Where a Complaint concerns an Employee or Employees of the Association, a Committee Member or Members, or an Active Member the Nominated Representative of which is a Committee Member, then that person shall be excluded from taking part in any investigations or considerations of the Matter.

ORIGIN OF COMPLAINTS

A complaint may be received from any of the following:

- A Committee Member or Members;
- An Employee or Employees;
- A Member or Members;
- A Client or Clients of a Member or Members;
- An Organisation or Organisations;
- Any other Person or Persons.

In the first instance, any complaint must be directed to The Committee, through The Executive Secretary, at The Association's Office.

Upon receipt of a Complaint, The Secretary shall:

- In writing to the Complainant, acknowledge such receipt and advise the Complainant that the matter will be dealt with in accordance with this Policy, and that the Complainant will be advised in writing of the outcome, in due course;

As soon as is practicable, advise The President, or in the event that The President is unavailable The Vice President, that the Complaint has been received and the nature of the Complaint.

The President or Vice President will make a determination regarding the urgency and / or seriousness of the Complaint, to either:

- Instigate this Procedure, forthwith; or
- Table The Complaint at the next scheduled Committee Meeting.

ANNEXURE 2

NATURE OF COMPLAINTS

A Complaint may allege one or more of the following matters:

- An Illegal or Unlawful Act;
- Pricing and or Charges being not in accordance with Estimates given;
- Goods or Services Supplied being not in accordance with those agreed to;
- Goods or Services Supplied being not of a Reasonable Standard;
- Conduct Contrary to any Legislation or Regulation;
- Conduct in Violation of The Association's Rules;
- Conduct liable to bring the profession of Funeral Directing into disrepute;
- Conduct liable to bring The Association into disrepute;

Complainants may request that the source of any Complaint be treated as confidential in the first instance, however The Committee reserves the right to make available to the Party who is subject of the Complaint, complete and full details of the Complaint, including details of the Complainant, as a part of The Committee's investigations.

INVESTIGATION & RESOLUTION OF COMPLAINTS

The following steps will be undertaken in accordance with the determination made by The President or Vice President as noted above.

Some or all of the following three (3) steps may be delegated by The President, Vice President or The Committee to The Secretary or any Member or Members of The Committee.

1. The Complainant will be contacted, by whatever method is most practicable in the given circumstances, in order to gain full and further particulars of any allegation or allegations.
2. The Party who is subject of the complaint will be contacted, by whatever method is most practicable in the given circumstances, in order to place the allegation or allegations before them. (In the case of a Complaint against an Active Member, contact shall be made with The Nominated Representative).
3. The Party who is subject of the complaint will be required to provide to The Committee, in writing via The Secretary at The Association's Office and within 14 days of being advised of the allegation or allegations, their response to the allegation or allegations.

At the next meeting of The Committee, any further particulars of the allegation or allegations obtained by way of 1 above, together with any response received in accordance with 3 above, will be tabled and considered by The Committee.

After Consideration, The Committee may, at its absolute discretion:

1. Find that further investigation is required, and appoint two (2) or more members of The Committee to further investigate the matter and report the

ANNEXURE 2

results of their investigations to The Committee for further consideration, as soon as is practicable; or

2. Find that the allegation or allegations in the Complaint are not proven, and that the complaint will not further be sustained; or
3. Find that the allegation or allegations in the complaint are proven, but that it is inappropriate for any further action to be taken by The Association; or
4. Find that the allegation or allegations in the complaint are proven, and that it is appropriate for the matter to be referred by The Association to another appropriate Authority or Organisation for further action; or
5. Find that the allegation or allegations in the complaint are proven, and that it is appropriate for The Association to take action by way of, either
 - (a) Counselling of the Party subject of the Complaint; or
 - (b) Serving on the Party subject of the Complaint, a written Notice of Official Reprimand;
 - (c) Moving to terminate the membership of the Party subject of the Complaint, in accordance with Rule 8 of The Association Rules.

Where, in a period of five (5) years, a Party has been served with three (3) Notices as described in 4 (c) above, The Committee shall move to terminate the Association Membership of the Party or the employment of the Party or The Committee Membership of the Party, as appropriate.

RESULTS OF COMPLAINT INVESTIGATION

Any findings of The Committee in relation to a Complaint will be advised, in writing by The Secretary, to The Complainant and to the Party subject of the Complaint.

All records of the Complaint, including any investigations and determinations, will be retained by The Secretary and filed at The Associations Office.

ANNEXURE 4

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Re: The Late XXXXXXXXXXXXXXXXXXXX

To the expenses incurred in the funeral of the abovenamed on XXXXXXXXXXXXX, 2004.

Supplying: Classic polished coffin with handles, escutcheons, ornaments, engraved inscription plate and upholstered in swansdowne with the use of our hearse and mourning car to the XXXXXXXXXXXXXXXXXXXX Crematorium.

Professional fee	\$ 1,721.10
Casket	550.00
Transfer	200.00
Mortuary fee	75.00
	<hr/>
	\$ 2,546.10

Expenses paid on your behalf:

Cremation fee	660.00
Clergy fee	143.00
Floral tribute	165.00
Doctors' certificate	154.00
Advertisements	220.00
Death certificate	31.90
Attendance book	0.00

Total - including GST of \$ 442.36	<hr/> <hr/> 3920.00
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ANNEXURE 5

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Re: The Late XXXXXXXXXXXXXXXXXXXX

To the expenses incurred in the funeral of the abovenamed on XXXXXXXXXXXXX, 2004.

Supplying: Classic polished coffin with handles, escutcheons, ornaments, engraved inscription plate and upholstered in swansdowne with the use of our hearse and mourning car from XXXXXXXXXXXXX Church to the XXXXXXXXXXXXXXXXXXXX Cemetery.

Professional fee	\$ 1743.10
Casket	550.00
Transfer	200.00
Mortuary fee	75.00
	<hr/>
	\$ 2,568.10

Expenses paid on your behalf:

Interment fee	1386.00
Clergy fee	143.00
Organist	110.00
Floral tribute	165.00
Advertisements	242.00
Mourning coach	220.00
Death certificate	31.90
Attendance book	0.00
Total - including GST of \$ 442.36	<hr/>
	\$ 4,866.00

NB: This account assumes that the right of burial has been pre-purchased, and that the only cemetery fees payable are for the actual interment (first).