

The Avalon Funeral Trust No. 2

Solvency Assessment Report

as at 30 June 2022

Date: 6 October 2022

Prepared by: David Downie BSc FIA

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Solvency Assessment Report of the Avalon Funeral Trust No. 2 as at 30 June 2022

Introduction and Executive Summary.....	3
Purposes of the Report	5
Trust and Operational Provisions.....	6
Summary of Data	7
Asset Valuation	8
Valuation Assumptions	9
Inter-valuation Experience.....	12
Funding Position - Best Estimate Basis	14
Funding Position – Previous Valuation Basis	15
Reconciliation of Results.....	15
Risks	17
Conclusion.....	18
Appendix 1 - Valuation Method.....	19
Appendix 2 - Liability Profile	20
Appendix 3 - Cashflow Profile	21
Appendix 4 - Funding Position - Sensitivity Analysis.....	22

Introduction and Executive Summary

I have been requested by Avalon (Europe) Limited (“the Plan Provider”) to perform an actuarial valuation of the Avalon Funeral Trust No. 2 (“the Trust”) and to provide a Solvency Assessment Report (“SAR”) as required by the Financial Conduct Authority (“FCA”) under section 3.2.2 of the Funeral Plan: Conduct of Business sourcebook. The Trust is for the pre-arrangement and pre-funding of funeral services.

This report, in accordance with the Financial Services and Markets Act (Regulated Activities) Order 2001 act. 60(1)(b)(v) the “RAO”, covers the determination, calculation and verification of the assets and liabilities (known as the RAO valuation) of the Trust as at 30 June 2022 (the “Valuation Date”). The report is addressed to the Plan Provider but contains information that is also relevant to the Trustees. It describes the financial condition of the Trust at the valuation date and considers the funding appropriate to the Trust after the valuation date.

This is a supplementary report which summarises the salient points of a more technical report which has been prepared for the Trustees and the Plan Provider. It is expected as required by the FCA for this report to be published on the Plan Provider’s website.

In preparing this report we have complied with the Technical Actuarial Standard (TAS) - TAS 100 covering Principles for Technical Actuarial Work. It is expected that the Financial Reporting Council, who publishes the TAS’s in consultation with the Institute and Faculty of Actuaries, will update TAS 400 (covering Funeral Trusts) to give specific guidance on contents of the SAR. This report complies with the principles of TAS 400, to the extent applicable.

We have also taken account of the following items produced by the Institute and Faculty of Actuaries:

- APS Z1 “Duties and responsibilities of actuaries working for UK Trust-based Pre-Paid Funeral Plans (effective 01.12.2015);
- APS X2 “Review of Actuarial Work” (effective 01.07.2015);
- Guide for Actuaries on UK Trust-Based Pre-Paid Funeral Plans;
- Guide for Trustees on UK Trust-Based Pre-Paid Funeral Plans.

The previous valuation on the scheme was carried out as at 30 June 2021 and my final report was dated 6 October 2021. The period under review is therefore twelve months.

This valuation does not take account of any future new business that may be written after the effective date of this valuation. This report is produced for the use of the Trustees and Plan Provider and should not be relied upon by any other party without contacting the actuaries involved.

The results of the valuation show that the Trust has a Best Estimate funding level of 100.0%.

Further sensitivities to the above results are demonstrated under Appendix 4.

Purposes of the Report

The main purpose of this valuation is to advise the Trustees of the position of the Trust relative to the liabilities as required under clause 11.3 of the Rules of the Trust and this is purely a “valuation exercise”. The valuation also satisfies various statutory requirements as required under Financial Services and Markets Act 2000 (Regulated Activities) Order 2001 and the Funeral Planning Authority Code of Practice and Rules.

For this actuarial valuation, the liabilities have been calculated based on the settlements and disbursements due to be paid to the funeral directors that have contracted to conduct the funerals of policyholders.

The report includes elements required by FCA which are also required to be reported in the SAR, namely :-

- the determination, calculation and verification of both the assets and liabilities of the Trust under a best estimate basis;
- the liabilities are to be measured against the amounts needed to provide the funeral
- the funeral plan Trust data should be shown into the following subcategories of payment method:
 - paid in full or single payments;
 - instalment payments fully paid;
 - instalment payments not fully paid.
- where the funeral costs increase with inflation this may be allowed for.

The purposes of the valuation are described above and the report is produced for the use of the Trustees and Plan Provider. Neither Rowanmoor, nor I accept any liability to any third party in respect of the contents of this Report for its use for any purpose other than those set out as above.

Trust and Operational Provisions

The operation of the Trust is governed by a Trust Deed prepared by Wragge & Co dated 7 September 1999 (amended and restated by a Deed of Amendment dated 1 August 2022). I have assumed that the reader of this Report has a reasonable knowledge of the operation of the Trust.

Plans Available

There are currently numerous types of Avalon funeral arrangements which have been sold in Spain, Gibraltar, Turkey and Cyprus. Further details are available from Avalon (Europe) Limited. A summary of the number of different types of plans sold as at the valuation date are shown below.

Each main plan has a specific set of terms and conditions that stipulate the funeral expenses that will be paid, the amount of the premium and the terms of payments.

Payment Methods

Each plan may be paid for by way of an upfront lump sum payment or by way of regular payments over a predetermined number of years.

Inflation Protection

The funeral arrangement costs are normally split into two parts; the funeral directors' costs and the disbursement costs. Each participating funeral director has agreed to perform its duties based on an agreed fee, increased by inflation up to the date of death. The additional element of disbursement costs will be met separately, and these will also increase on an agreed basis in line with inflation up to the time of death.

I have been advised by the Trustees that the future measure of inflation proofing will be linked to the Consumer Prices Index (CPI).

Summary of Data

Avalon (Europe) Limited has provided the data to enable me to perform this valuation. Although I have taken all reasonable steps to ensure that the data is of adequate quality for the purposes of this valuation, I have relied on the accuracy of the information provided by the Trustees. The responsibility for the accuracy of the data for the valuation is therefore ultimately that of the Trustees. I have no material uncertainty about the accuracy of the data.

	30 June 2022			
	Single Payment	Instalments Paid in Full	Instalments In force	Total
Number of Male Plan holders	953	1,540	72	2,565
Number of Female Plan holders	1,164	1,937	66	3,167
Total Plan holders	2,117	3,477	138	5,732
Total Settlement £' 000's	5,458	8,966	334	14,758
Average Settlement	2,578	2,579	2,420	2,578

In addition to the above plans there were 125 lapsed and non-paying plans. This Trust no longer receives new plans being sold, so it is expected that the number of plans will gradually reduce over time. Over the past year there were 314 enacted plans and 47 new lapsed plans.

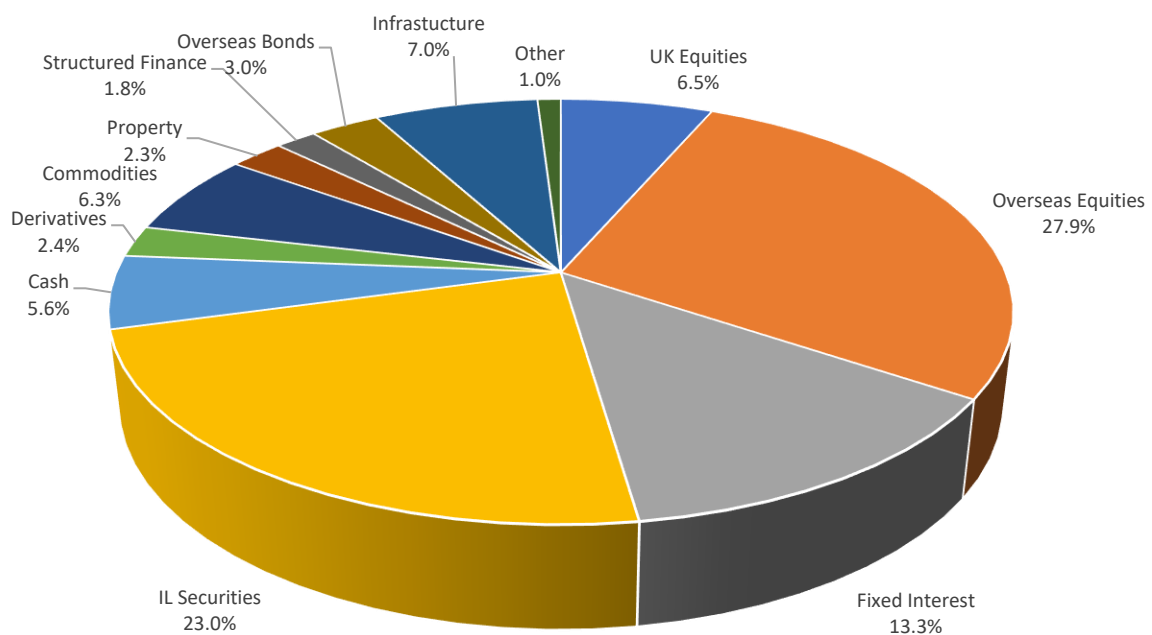
At this valuation there is a total of 3,740 instalment plans and 2,117 single payment plans. Corresponding figures at the last valuation were 3,964 instalments plans and 2,256 single payment plans.

Asset Valuation

The following summarises the value of the Trust assets held at the valuation date as set out in the Trust accounts which includes an agreed remediation contribution.

	2022	2021
	£000's	£000's
RUFFER	3,259	3,266
THREADNEEDLE	4,952	5,847
BAILLIE GIFFORD	4,231	4,919
CASH DEPOSITS	58	266
DEBTORS LESS CREDITORS	(121)	(59)
REMEDIATION	215	
TOTAL	12,594	14,239

The Avalon Funeral Trust No. 2 covers all plans sold in Europe up to 29 November 2012. The breakdown of the investment allocation by asset classes is shown below:-



Valuation Assumptions

The construction of the valuation basis involves consideration not only of current economic factors and fund experience but also as to future trends in mortality, investment yield and the rate of growth in funeral costs. The basis adopted should be viewed with regard to relationships between the assumptions rather than to the absolute value of any components.

Most importantly, the relationship between the investment return and the assumed level of inflation gives an indication of the real yield (before tax) expected to be earned on the investments held within the Trust.

Allowance must also be made of the tax payable by the Trust as the actual return earned on the money held in the Trust will be net of tax and net of expenses. The Actuarial basis may be subject to change over time. I have detailed below a set of assumptions that I have utilised in my calculations. Details of the valuation method used for the determining the liabilities in the Trust are given in Appendix 1.

Mortality

The Trust is too small to warrant use of its own mortality experience and hence will have to incorporate the use of mortality tables as published by the Institute and Faculty of Actuaries.

For the purposes of this review, the mortality rates have been chosen to reflect the general trend in improvement of mortality experience and the rates utilised are in accordance with standard tables published jointly by the Actuarial Profession known as English Life Tables 17.

Factors taken into account for Economic Assumptions

In recommending the economic assumptions set out below, the following factors have been taken into account.

Investment Growth

At the date of the review the annualised yield available under UK Government 10 Year Gilt is 2.3% per annum. This will represent the risk free rate of return expected on the investments of the Scheme. The dividend yield on the FTSE All-Share was 3.45%.

However, the Statement of Investment Principles has allowed the Trustees to consider a degree of exposure in equity markets in an attempt to maximise the expected long term rates of return. The Trustees have a range of investments held with Baillie Gifford, Ruffer and Threadneedle Investment Services. The overall targeted investment return is measured as the Gilt yield plus an equity risk premium of 3.5% to give a gross yield of 5.8% p.a.

Inflation Assumption - Funeral Directors Costs and Disbursement Costs

Combining the above yield on the fixed interest gilts with the real yield available on index linked gilts (5 to 15 Years) as at the review date, which averaged minus 1.27% per annum, implies a medium term rate of inflation as measured by the Retail Prices Index of 3.3% per annum, after allowing for an inflation risk premium of 0.3%. As the link to inflation is now CPI for both funeral directors' costs and disbursement costs, and assuming it is on average 0.9% below RPI gives an assumption of 2.4% p.a.

Expenses

The annual expenses of administering the Funeral Plans which is carried out by Avalon Trustee Company Limited and including the investment management fees, are paid directly from the Trust. An explicit allowance has been made of £80,000 p.a. for a period of 10 years with allowance made for future CPI increases.

Discount rate - Net Investment Return

The discount rate used in valuing the liabilities of the Trust is the net return on investments after allowing for the payment of taxes.

I have therefore taken the gross investment return of 5.8% and reduced it to 4.6% to reflect the expected after tax position assuming a tax rate of 21.9% over a 10 year time horizon. The net discount rate for valuing the liabilities is then taken as 4.6%.

Cancellations

Plan holders who have informed Avalon of their wishes to cease instalment payments will receive credit for all payments made after a deduction of an administration fee by Avalon (Europe) Limited. An allowance for future cancellation rates has been incorporated in the valuation. The rates vary over the method of distribution.

Deaths under Instalment Plans

A balancing payment is assumed to be made in respect of the discounted value of the outstanding instalments, thereby creating no strain on the Trust Fund.

Taxation

I have been advised by the Plan Provider that the expected average rate of tax payable is 21.9% p.a. In addition there is a positive tax provision from historical events of £365,000 which had the effect of reducing the Trust's liability.

A comparison of the assumptions adopted for this valuation and last year's best estimate valuation is shown below:-

	2022	2021
Net Discount Rate	4.6%	4.2%
CPI inflation	2.4%	2.26%
Expense allowance	£80,000 p.a.	0.60%
Tax allowance	21.9%	16.5%
Mortality Allowance	ELT 17	ELT 17
Average Cancellation rates	2.2% after year 1 reducing to 0.6%p.a. after year 12	-

Inter-valuation Experience

We have carried out a mortality investigation on the deaths of all policyholders of the Trust over the year to 30 June 2022. This investigation revealed that the number of deaths was approximately 94% of the number that would have been expected if experience had been in accordance with the English Life Table number 17 (ELT17).

The rate of mortality in the year to 30 June 2022 (i.e. 94% of ELT17) is better than that assumed at the previous valuation (i.e. 100% of ELT17) and this has had a positive impact on the finances of the Trust. Volatility in the mortality experience is to be expected as the membership is relatively small and one year is a short time period to consider. Mortality experience will continue to be reviewed at each valuation and adjustments made where deemed to be appropriate. The table below summarises the results from this year's investigation and the previous 2 years:-

Period	Experience (% of ELT17)
July 2019 to June 2020	99%
July 2020 to June 2021	100%
July 2021 to June 2022	94%

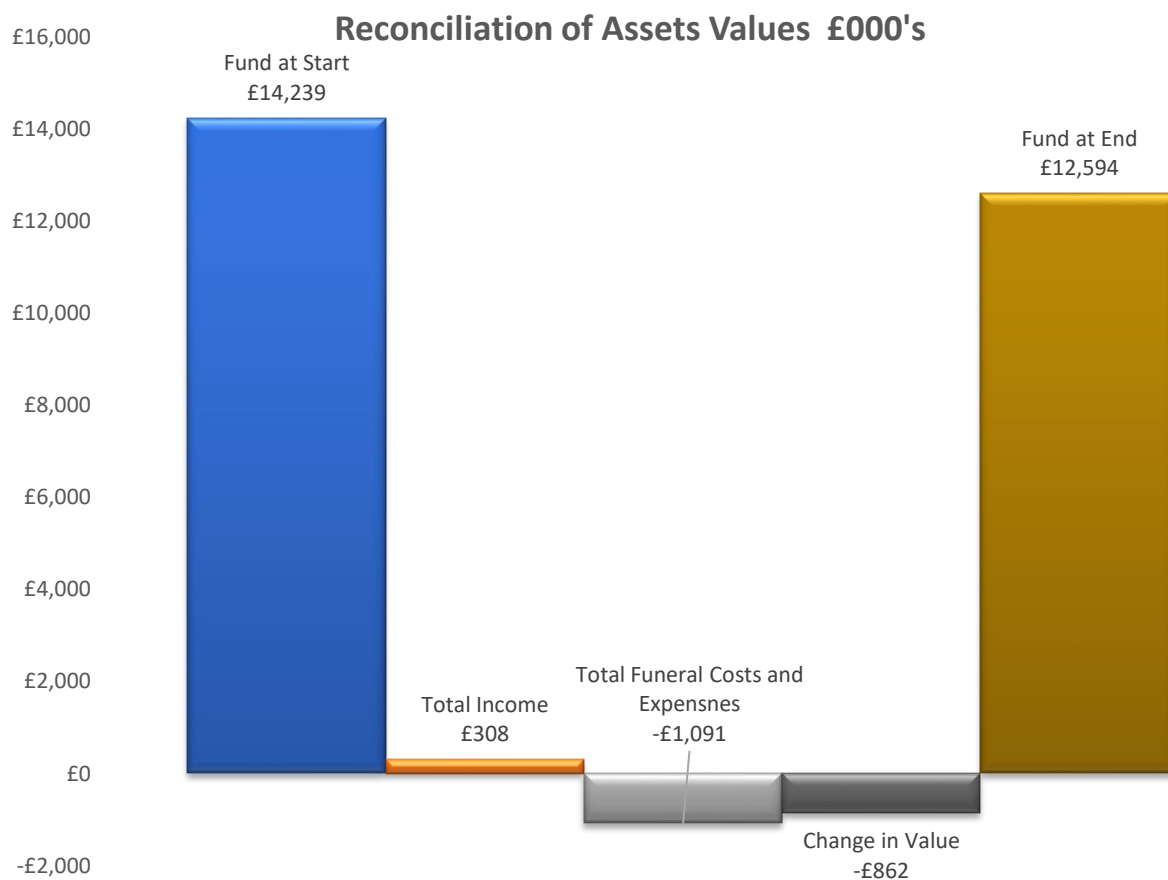
For the purposes of this review I have continued to use the loading factor to 100% of the mortality table ELT 17.

The estimated annual investment return earned on the assets as shown in the Trust accounts to 30 June 2022 has been calculated to be approximately minus 6.3% for the year compared to 3.6% p.a. assumed net of expenses at the previous valuation. This has not been favourable to the Trust and reflects market movements during the inter valuation period.

The average increase in the settlement costs due to the Consumer Prices Index ("CPI") over the year was 9.4% p.a. compared to 2.26% p.a. assumed at the previous valuation, thus causing a funding loss which is not beneficial for the Trust.

The expected total of future outstanding annual premiums from the existing active instalment plans has been calculated to be £104,000 as at the valuation date. The premiums to follow are a calculation based on the monthly premiums expected to be received from all Active plans over the remainder of the outstanding term of the plans.

As at 30 June 2022 the Plan Provider agreed to remediate the trust to cover any funding shortfall identified because of the valuation and this amount has been paid prior to the signing of this report. A reconciliation of assets during the 12 months to the Review Date is set out below.



Funding Position - Best Estimate Basis

The liability of the Trust fund arises from the two main categories of plans held, Instalment Plans and Single Payment Plans. Based on the membership data and assumptions set out elsewhere in this report, I calculate that the value of the liabilities for the funeral plans including future projected inflation increases is as summarised below.

	2022	2021
	£000's	£000's
Value of Investments	12,594	14,239
Present Value of Future Instalments	83	166
Total Value of Assets (A)	12,677	14,405
Value of Funeral Costs	(12,322)	(13,634)
Tax Provision	365	-
Expense Reserve	(720)	-
Total Value of Liabilities (L)	12,677	(13,634)
Surplus/(Deficit) (A – L)	-	771
Funding Level (A/L)	100%	105.7%

The above liabilities have been assessed by converting the Euro denominated liability into sterling by using the actual exchange rate as at the valuation date of €1.159 to the pound as advised by the Trustees. This Trust is exposed to the currency fluctuations of the Euro if the investments are invested predominantly in sterling. The Euro exchange rate applicable at the 2021 valuation was €1.163. Therefore, the Trust's liabilities are slightly higher than expected at this valuation due to the change in exchange rate in isolation.

The sensitivity of the above results due to changes in the actuarial assumptions and the impact due to future potential adverse events is highlighted in Appendix 4.

Funding Position – Previous Valuation Basis

The valuation assumptions we have used at this valuation are different to those used in the 2021 valuation. On the 2021 basis, the 2022 valuation result would have given a funding level of 97.3%. It is prudent to continue improving the funding level of the Trust and this can be achieved from improved investment returns as well as a cautious approach to the expenses being paid out of the Trust and the payments made from the Trust fund at the time of death.

Reconciliation of Results

In order to obtain a greater understanding of the ongoing results, I have carried out an analysis to reconcile the surplus emerging at this valuation date with the previous year's results.

The table below shows a reconciliation of the surplus with the position disclosed by the previous valuation and quantifies the financially material items of actuarial gain or loss.

	Favourable/(Unfavourable)
	£000's
Surplus at previous valuation plus interest	803
Investment Return lower than expected return	(1,439)
Membership Experience Gains/ Losses	(689)
Cashflows Impact over the year	611
Change in actuarial assumptions	714
Surplus at this valuation	-

A profile of the liability of the funeral plans is shown in Appendix 2. The profile highlights the age distribution of the funeral plans and the distribution of the liability of the Trust spread over the age range of the plan members. This will be useful information when considering and reviewing the investment strategy of the Trust.

Future Cashflows

The table below shows the future projected cashflow payments out of the Trust over the next five years. A full cashflow forecast is shown in Appendix 3. These cashflows represent only the expected funeral plan payments for all plans held at the valuation date. No allowance is made for any future premiums due from the existing instalment plans.

	Total Future Expected Funeral Costs £ 000's
Year 1	£839
Year 2	£865
Year 3	£891
Year 4	£913
Year 5	£932

Risks

It is important to appreciate the various risks inherent in the valuation of the liabilities of the Trust. In particular, the main risk is that the valuation assumes a net real return of 2.2% p.a. will be earned on the investments within the trust after allowance for elements of inflation, and tax.

Should any one of these elements increase at a higher rate than assumed thereby reducing the net real investment return earned on the assets then the level of future surplus will be lower and indeed the Trust could potentially emerge with a deficit. The degree of sensitivity of the results was shown above and therefore due care is needed when agreeing any non funeral plan payments out of the Trust.

The Trust has incorporated up-to-date rates of mortality. Should plan members die sooner than assumed then the Trust will pay out before it is expected leading to a reduction in future levels of surplus.

The success of Avalon (Europe) Limited to maintain its new business levels has a direct impact on the ability of the Trust fund to continue meeting the expenses of administering the funeral plans. Should there be a fall in new business without a corresponding reduction in the administration expenses will lead to lower levels of future surplus.

The Trust has reduced its exposure to currency exchange risk as the majority of the assets are denominated in Euros which is similar to the Euro linked liabilities. The Trustees should bear this in mind when reviewing the Statement of Investment Principles. For the purposes of calculating the sterling equivalent of the liabilities, the Trustees have advised to use the Euro to Sterling conversion rate at the valuation date of €1.159.

Conclusion

The Trust's assets are sufficient to cover 100% of the liabilities at the valuation date on the basis of the best estimate assumptions adopted.

The Trust's investment strategy should be kept under regular review.

Material Changes

I am not aware of any further changes that will have materially altered the results of this report at the date of signing.

Date of Next Review

The next formal valuation should be carried out as at 30 June 2023.



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Appendix 1 - Valuation Method

Valuation Method - General

The approach adopted for the valuation consists of projecting future cashflows of expected payments from the Trust and then discounting back these cashflows to produce a total net present value liability.

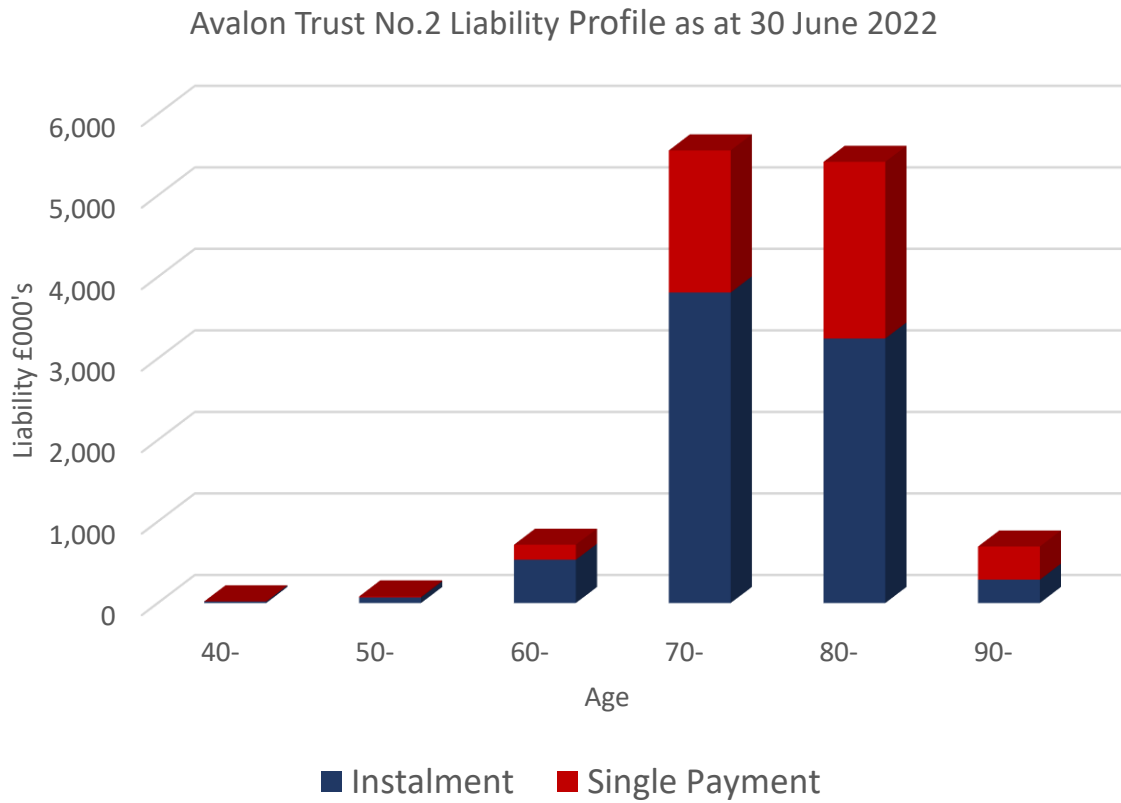
Valuation Method - Liabilities

For the purposes of my calculations I have adopted a cashflow funding method to determine the value of the future expected funeral costs. This method involves projecting the funeral plan payments into the future until the assumed life expectancy of the plan holder. Allowance is also made of the possibility of the cancellation of the plans (where applicable) and the projection will allow for future increases on the funeral payments in line with the assumed rate of inflation. The funeral plan payments consist of both the Funeral Directors Fees and the Disbursement Costs. The individual projected expected funeral payments are then discounted back at the net of tax discount rate to the valuation date and then added together to give the total liability. The liability is then compared with the actuarially valued assets of the Trust to determine the level of any shortfall or surplus arising.

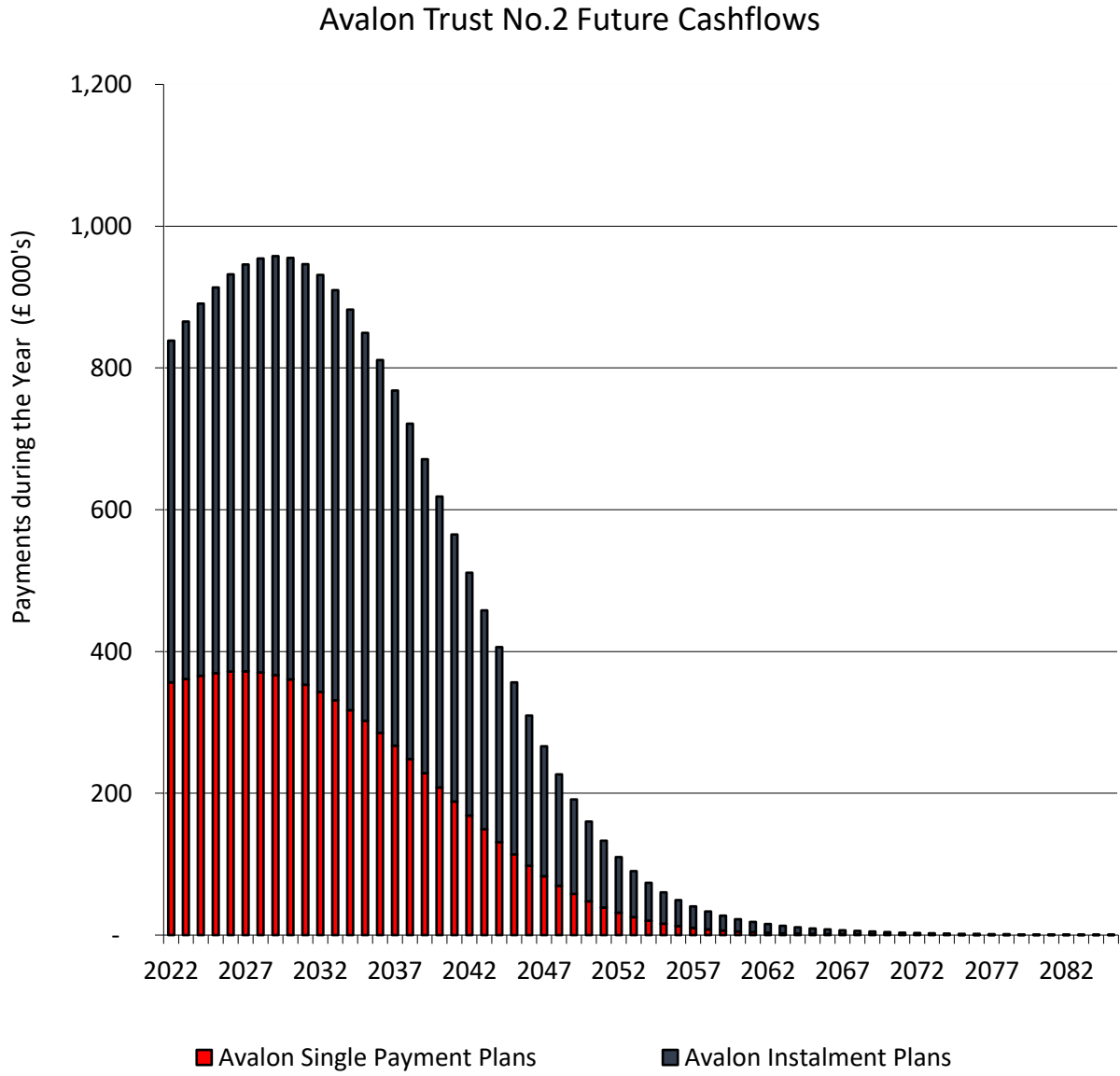
Valuation Method - Assets

For the purposes of this valuation the assets have been taken into account at their market value as shown in the Trust accounts. In addition, the discounted value of the future outstanding instalment payments (after allowing for both mortality and cancellation rates) is included as an asset value as these are needed to meet the future funeral costs.

Appendix 2 - Liability Profile



Appendix 3 - Cashflow Profile



Appendix 4 - Funding Position - Sensitivity Analysis

There is a requirement for enough information to be provided to the Trustees to demonstrate the sensitivity of the current financial position and development of the financial position of the Trust to risks arising from difference between the nature, term and characteristics of the liability cashflows and the assets of the Trust and any other material risks.

I have set out below details to demonstrate the sensitivity of the Best Estimate valuation of the Trust. It should be noted that the impact of the changes on the liabilities are considered in isolation. Changing more than one assumption at a time may not be equivalent to summing the changes below.

Net Discount Rate

The best estimate funding position above incorporates a net discount rate of 2.2% p.a. (after inflation and tax). Allowing for a change in the net discount rate by 0.5% p.a. will provide the following results:-

	Reducing by 0.5% p.a.	Increasing by 0.5% p.a.
	£000's	£000's
Value of Fund Assets (A)	12,679	12,677
Less Value of Liabilities (L)	(13,191)	(12,202)
Surplus / (Deficit) (A-L)	(512)	475
Funding Level (A / L)	96.1%	103.9%

The above change in discount rate can reflect either a change in the future expected investment return on the Trust assets, a change in tax treatment of the Trust or a change in future expected inflation - each change being considered in isolation.

Mortality Sensitivity

The ongoing funding position above allows for mortality as measured by 100% of ELT 17. If allowance is made for the mortality adjustment to alter by +/- 20% will adjust the funding level by -1.7% / +2.3%.

High Inflation combined with increased longevity

However, if we were to combine an increase in future expected inflation by 0.75% p.a. with an increase in longevity of 3 years on average then the net result will be a fall in the funding level to 96.3%.

Pandemic

The Trustees should be aware of the risk associated with any future pandemic and the effect it could potentially have on the financial position of the Trust. I have therefore considered a scenario whereby 25% of all plans become enacted and the cost of associated funeral plans are paid out immediately.

I have assumed that the claims will be spread evenly across all plans. The liability of the Trust will therefore fall by 25% but when added to the value of the potential claim payments the total liability becomes £13,219,000. This leads to a funding level of 95.7% at the review date.