13 MAY 2021

FAMILY FUNERALS PRE-PLANNED FUNERALS TRUST (OPEN) ACTUARIAL VALUATION AT 31 DECEMBER 2020

FAMILY FUNERALS TRUST LIMITED

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Executive Summary

Valuation results

The assets of the scheme amounted to £16,600,907 and the liabilities were equal to £15,494,933 at 31 December 2020. The Scheme, therefore, had a surplus of £1,105,974, representing 7.1% of the liabilities, at the year-end. The surplus was £1,312,430 at 31 December 2019 (8.7% of the liabilities).

Main conclusions and recommendations

We regard the current surplus of 7.1% of the liabilities as reasonable considering the Scheme's exposure to the various risks it faces.

The "underlying liability" (see Section 7) is £10.3m, which is £6.3m lower than the Scheme's total assets of £16.6m. This means that there is sufficient money in the Scheme to cover the expected costs of providing the future funerals. In addition, we have conducted stress testing to give us comfort that the Scheme's assets are sufficient to cover the real underlying liability, even in the event of the adverse circumstances tested.

Impact of the Coronavirus

We have not made any specific adjustments to the calculations as a result of the COVID-19 pandemic. The standard approach implicitly allows for the impact of COVID-19 on mortality in the last 12 months as our mortality calculations use a 5-year rolling average. There are numerous theories and studies on the long-term impact of COVID-19 on long-term mortality, many of them suggesting different outcomes. We are comfortable that the methodology used is prudent for the Scheme.

1. Introduction

1.1 Purpose of this report

FTI Consulting LLP ("FTI") has been instructed by Family Funerals Trust Limited ('FFTL') to carry out an actuarial valuation on both the Open and Closed schemes. FFTL and the trustees will be the main users of this report. Section 9 sets out important reliances and limitations in relation to the work undertaken to prepare this report. The investigation relates to the Open Scheme (the "Scheme") of Family Funerals Trust Limited as at 31 December 2020.

The previous investigation was carried out as at 31 December 2019.

We have investigated the adequacy of the combined assets of the two funds backing the Scheme. The No.1 Fund represents all the Mandated Payments and the No 2 Fund consists of all income earned on the funds.

1.2 Operation of the Scheme

Through the pre-emption agreement in clause 22 of the Trust Deed, capital gains and losses for both the No.1 and No.2 Fund are passed onto FFTL, a wholly owned subsidiary of Lodge Bros. (Funerals) Limited.

1.3 Method of valuation

Data was supplied by FFTL and the investment managers, Rathbone Brothers Plc ("Rathbones"), by e-mail in January 2021. We have made our own reasonableness checks on the data, but have relied upon the accuracy of the data supplied.

For the purpose of the valuation, there are two different types of plans in the Scheme:

- "Dignity plans" – 684 plans

  These plans are valued on an RPI-linked basis. They were originally sold by funeral directors in Wiltshire and Cambridgeshire which were later acquired by Dignity. The Mandated Payment is rolled up with RPI from the plan start date until maturity, which involves a two-part calculation:

  I. The Mandated Payment is rolled up from the plan start date using historical RPI data sourced from the Office of National Statistics

  II. The amount calculated above is then accumulated at the market expected inflation rate for the planholder's expected future lifetime

- "Non-Dignity" plans – 3,475 plans

  In line with previous years' valuation methodologies, the liability for these plans is valued according to a fixed uplift of the Mandated Payment. The Scheme is being operated with a limit on the amounts of the Certified Sums which become payable under clause 22 of the Trust Deed. The limit agreed after the 2015 Trustee meeting, and still in operation, is 105% of the Mandated Payments. We have therefore valued the liabilities on this basis.

For instalment plans, the liability has been based on the Mandated Payment paid to the valuation date, as opposed to the total Mandated Payment due.

The liabilities have been discounted at a rate of interest which does not allow for any capital gains or losses in asset values as the Scheme is immune from such changes. An allowance for mortality of members has been made in calculating the reserves. No allowance has been made for refunds. For the underlying liabilities discussed in Section 7, the rate of interest takes account of capital growth as this is an asset of FFTL.

2. Membership Data

The membership data was supplied by FFTL by e-mail in January 2021. We have relied upon the accuracy of the data supplied but have also carried out reasonableness checks. Although we have not found any material issues, we have highlighted, in Appendix A, the minor data issues encountered and the steps taken to rectify the data.

We have reconciled the membership at 31 December 2020 with that at the last year-end using movement data provided, as shown in the table below.

	Male	Female	Joint	Total
Number of members as at 31 Dec 2019	1,479	2,721	58	4,258
Refunds/Lapses	4	13	0	17
New Members	100	171	4	275
Deaths	140	216	1	357
Adjustments	-8	-13	21	0
Number of members as at 31 Dec 2020	1,427	2,650	82	4,159

The “Adjustments” line in the table reflects the corrections made to member data as a result of more complete information on joint policies being made available.

The database used in the calculation of the reserves shows the total Mandated Payments of £15,306,230 which agrees with FFTL’s records after an allowance of £158 due to PZ1178 being removed as they were already deceased at the time of the valuation.

3. Mortality

3.1 Setting the mortality assumption

We have retained the same approach as that used at the last valuation in setting the mortality assumption.

The valuation of the liabilities allows for the expected future timing of plan holder deaths, using the English Life Tables No. 17 ("ELT 17") mortality tables. The ELT 17 tables are based on the mortality experience of the population of England and Wales during the years 2010, 2011 and 2012. The mortality tables are adjusted to reflect the experience of the Scheme relative to population mortality and to include a margin for prudence. This adjustment is calculated in an experience investigation.

The valuation does not allow for future mortality improvements as the average life expectancy of the Scheme is relatively short and the impact would therefore be insignificant.

3.2 Experience investigation

The investigation compares the actual number of deaths observed to those expected using the ELT 17 tables over the past five years (2016-2020). The A/E (actual/expected) ratios calculated at the last five year-ends all exceeded 100%, reflecting a higher mortality experience than that of the general population, as described by the ELT 17 tables. This would be expected as some plans will be purchased when people are in ill health and the socio-economic demographics of the average purchaser will exhibit higher mortality than average. There is no obvious effect from additional pandemic deaths.

Investigation period	A/E ratio
2016 – 2020	119%
2015 – 2019	123%
2014 – 2018	135%
2016 – 2017	127%
2014 – 2015	139%

3.3 Valuation assumption

We calculated the valuation mortality assumption in the following way by combining the experience of the Open and Closed schemes together and including a margin for prudence.

	Open	Closed
Investigation result (2016 – 2020)	119%	113%
Weighted average of both Schemes	119%	119%
Margin for prudence	+10%	-10%
Valuation assumption	**130%**	**107%**

For the Open Scheme, prudence is achieved by increasing mortality rates whereas for the Closed Scheme, lowering mortality rates increases the liabilities.

Decreasing the mortality rates pushes the modelled deaths of the plan holders further out into the future and decreases the liabilities as a result of more discounting at the valuation interest rate i.e. more asset returns accruing over the longer period. However, due to the large proportion of Dignity plan holders in the Closed Scheme, for whom liabilities are inflation-linked, this decrease in liabilities is more than offset by the increased inflationary increase to the mandated payments over the longer time period because future inflation is assumed to be higher than the valuation interest rate.

For the Open Scheme, which has a smaller proportion of Dignity plan holders, the effect of inflationary increases is not large enough to offset the reduced discounting. As a result, it is an increase in mortality rates that is more prudent. This will also provide protection against any underreporting of recent pandemic deaths.

4. Expenses

Rathbones' charges are 0.40% p.a. plus VAT on the Scheme's funds. This is allowed for implicitly in the valuation assumptions by reducing the valuation interest rate.

A separate reserve is required to cover other future expenses. Both the actuarial and audit fees are borne by FFTL and are not reclaimed from the Scheme. Therefore, the only expense borne by the Scheme (excluding fund management charges and any taxes payable) is Rathbones' Custodian fee of £8,000 p.a. plus VAT.

We have retained at this year-end the assumption that 25% of these fees are met by the Closed Scheme and 75% are met by the Open Scheme. Netting the expenses down for corporation tax at 23.71% p.a. means that we have assumed expenses for the Scheme to be £5,493 p.a.. The corporation tax rate quoted is a weighted average which reflects the forecast increase from 19% to 25% in 2023.

We have inflated these expenses at 4.1% p.a. for future years which includes a margin of 1% p.a. above future expected inflation derived from Bank of England data. Allowing for discounting over the duration of the liabilities, the expense reserve is £55,103.

This expense reserve is slightly lower than the 2019 valuation reserve of £61,272. This is primarily due to the effect of a higher corporation tax rate being applied.

The expense reserve for the Open Scheme is, pro-rata, higher than that of the Closed Scheme as the average age is younger and hence the average future duration of the liabilities is longer (9 years for the Open Scheme compared to 7 years for the Closed Scheme).

5. Assets

5.1 Summary of funds

The Scheme's assets are held in two separate funds. The No.1 Fund represents all Mandated Payments, while the No.2 Fund consists of all income from the funds. A further asset (liability) of the Scheme is any net Mandated Payments due to (from) the Scheme.

The acquisition values of the assets at 31 December 2020 and 31 December 2019 were:

	2020	2019
No. 1 Fund	13,981,725	13,770,593
Cash	610,670	858,226
TOTAL	**14,592,395**	**14,628,819**
No. 2 Fund	1,913,704	1,700,219
Cash	108,859	143,299
TOTAL	**2,022,563**	**1,843,518**
Adjustment	(14,051)	(12,351)
COMBINED TOTAL	**16,600,907**	**16,459,986**

The "Adjustment" line represents Mandated Payments paid into or out of the Scheme in December, which are only reflected in Rathbones' records after the year-end.

On 31 December 2020, the total market value of the assets of the Scheme stood at £18,086,252 which is a £1,471,294 gain to their acquisition value. Under the rules of the Scheme, this difference is an asset of FFTL and Lodge Bros. (Funerals) Limited.

At the valuation date the assets, at acquisition value, were distributed as follows:

	Acquisition Value (£)	Proportion	2020 Yield[1]	2019 Yield
Cash and Net Mandated Payments	705,478	4%	0.00%	0.40%
Fixed Interest	2,704,204	16%	1.89%	2.04%
Equity	11,381,668	69%	2.88%	3.24%
Alternatives	1,809,557	11%	2.36%	2.62%
Total	**16,600,907**	**100%**	**2.54%**	**2.80%**

[1]Yields represent the estimated running yield from the groups of assets

The average running yield for the Open Scheme was 2.54% p.a. for 2020 (2019: 2.80% p.a.). This decrease is due to the reduction in income for all asset types.

Due to the financial impact of COVID-19, some equities did not receive a dividend payment during the year. For these securities, we have used their expected long-term future running yield provided by Rathbones as we expect this year to have been an exceptional year. The impact of this decision was minimal to the average running yield and did not affect the resulting valuation interest rate being used (as quoted in section 5.2).

5.2 Valuation interest rate

The derivation of the valuation rate of interest is shown in the table below.

2020 Valuation Interest Rate Calculation (p.a.)	
Weighted average running yield	2.54%
Risk adjusted yield	2.48%
Less asset management charge (Inc. VAT)	(0.48%)
Less tax at 23.71%	(0.47%)
Less margin	(0.25%)
Valuation interest rate (rounded down)	**1.20%**

The risk adjusted yield is calculated using a reduction of 2.5% from the running yield. Asset management charges of 0.4% p.a. grossed up for VAT are deducted along with tax. Finally, a 25-basis point deduction is made for prudence in the interest rate. Except for the corporate tax rate, all of these are unchanged from the last valuation.

The valuation interest rate has decreased to 1.20% p.a. (2019: 1.50% p.a.), primarily due to a similar decrease in the average running yields of the assets and increase in corporation tax.

5.3 Corporation Tax

The U.K Government announced in March 2021 that corporation tax would rise from 19% to 25% from 1st April 2023. To allow for this, we have taken a weighted average of the expected future corporation tax rate. We have used the expected expense cashflows for each year for the weighting as they represent the survivorship of the Scheme going into the future. Using this method, we obtained an average corporation tax rate of 23.71% p.a..

6. Valuation results

6.1 Central basis results

The results of the 2020 valuation are shown in the table below along with the corresponding 2019 figures:

	2020	2019
Assets (£)		
No. 1 Fund	14,592,395	14,628,819
No. 2 Fund	2,022,563	1,843,518
Adjustment	(14,051)	(12,351)
Total Assets	**16,600,907**	**16,459,986**
Liabilities (£)		
Present value of certified sums:		
Dignity plans	2,829,531	2,966,159
Non-Dignity plans	12,610,299	12,120,125
Expense Reserve	55,103	61,272
Total Liabilities	**15,494,933**	**15,147,556**
Surplus/(Deficit)	**£1,105,974**	**1,312,430**
Surplus/(Deficit) as % of liabilities	7.1%	8.7%
Withdrawal	0	0
Surplus after withdrawal	**£1,105,974**	**1,312,430**
Surplus/(Deficit) as % of liabilities after withdrawal	**7.1%**	**8.7%**

At 31 December 2020, the assets of the Scheme amounted to £16.6m and the liabilities were £15.5m, leaving a surplus of £1.1m (equivalent to 7.1% of the liabilities). The solvency position of the Scheme has reduced slightly since 31 December 2019 with surplus decreasing by just over £200k.

The Trust Deed was amended in 2017 to allow us to consider whether the aggregate of the No. 1 and No.2 Funds meets the Trust's liabilities in total. However, this may only be done if the assets of the No.1 fund cover the liabilities of that fund (the Mandated Payments) in isolation; this is the case for this valuation.

6.2 Projecting liabilities into the future

All liabilities are reserved for prudently which means that margins are built into each assumption used in the valuation, such as the 0.25% margin in the valuation interest rate, the 10% loading on the mortality assumption and the 1% margin in expense inflation.

If actual future experience turns out to be exactly as expected (i.e. before the application of any margins), then the surplus in the Scheme will gradually increase as the margins in the assumptions are released, excluding the effect of new business (considered in Section 6.8).

The Scheme's surplus position at each of the last five valuations is shown in the table below. Over this period the Scheme has always been in surplus, demonstrating a sound financial position.

Year	2015	2017	2018	2019	2020
Surplus (£)	715,390	541,252	1,456,258	1,312,430	**1,105,974**
Surplus as % of liabilities	6.2%	3.7%	9.9%	8.7%	**7.1%**
Withdrawal (£)	-	-	570,000	-	-
Surplus after withdrawal	715,390	541,252	886,258	1,312,430	**1,105,974**
Surplus as % of liabilities after withdrawal	6.2%	3.7%	6.0%	8.7%	**7.1%**

6.3 Analysis of change in surplus

We have conducted an analysis of surplus to assess the main drivers behind the change in surplus:

	Surplus (£)	Change (£)
2019 Surplus	**1,312,430**	
Updated membership and asset data	1,593,014	280,583
Roll forward and updated RPI	1,507,677	(85,336)
Updated mortality	1,519,331	11,654
Updated expense inflation	1,519,390	59
Updated valuation interest rate (pre-corporation tax rise)	1,243,885	(275,505)
Updated corporation tax	1,105,974	(137,911)
2020 Surplus	**1,105,974**	

The major impacts on the surplus are described below:

- Updated membership and asset data – updating policy information and the Scheme's investments increased the surplus by £280,583
- Valuation interest rate – decreasing the valuation interest rate from 1.5% p.a. to 1.2% p.a. decreased the surplus by £275,505
- Corporation tax – increasing the corporation tax rate from 19% to 23.71% p.a. decreased the surplus by £137,911

6.4 Surplus sensitivity to the valuation assumptions

We have investigated the sensitivity of the surplus to changes in some of the key assumptions. The table below sets out the results of our analysis:

Sensitivity	Surplus (£)	Change (£)	Surplus (as % of liabilities)
Central Basis	**1,105,974**		**7.1**
Mortality +20%	1,056,935	(49,039)	6.8
Mortality -20%	1,166,391	60,417	7.6
RPI assumption +1%	843,464	(262,510)	5.4
RPI assumption -1%	1,339,623	233,649	8.8
Interest rate +1%	2,417,686	1,311,712	17.0
Interest rate -1%	(452,627)	(1,558,601)	(2.7)

The surplus is most sensitive to a change in the valuation interest rate – if the rate of interest were to decrease by 1% p.a., the surplus would decrease by £1,558,601 to produce a deficit of £452,627. We note that if this situation were to arise and the Scheme fell into deficit, action could be taken to reduce the fixed uplift paid out for Non-Dignity plans to increase the surplus.

6.5 Surplus sensitivity to scenario-based stress tests

In addition to varying key assumptions (interest rate, mortality and RPI) in isolation, we have assessed the combined impact of changes in two or more assumptions at the same time. The table below shows the impacts of the most onerous changes for each possible combination of assumptions.

Scenario	Surplus (£)	Change (£)	Surplus (as % of liabilities)
Central Basis	**1,105,974**		**7.1**
Mortality and interest rate both decreased	(526,345)	(1,632,319)	(3.1)
Mortality and RPI both increased	820,654	(285,320)	5.2
RPI increased and interest rate decreased	(755,283)	(1,861,257)	(4.4)
Mortality and interest rate both decreased while RPI increased	(870,154)	(1,976,127)	(5.0)

Although an increase in mortality rates on a standalone basis results in a more onerous sensitivity, it is the combined effect of a decrease in both mortality rates and the interest rate that triggers the most onerous of the scenarios in which these two assumptions are varied.

As expected, the most onerous scenario is where all three parameters are stressed at the same time; this causes the surplus to decrease by £1,976,127 to a deficit of £870,154. We note that if this situation were to arise and the Scheme fell into deficit, action could be taken to reduce the fixed uplift paid out for Non-Dignity plans to increase the surplus, but there would still be a deficit.

6.6 Risk and uncertainties

The Scheme is exposed to three key risks:

- **Mortality risk** – the Scheme is exposed to mortality experience being different than expected. We have applied a margin of 10% to the mortality assumption to produce a prudent liability value
- **Market risk** – due to the structure of the Scheme, it is not exposed to any changes in the market value of its asset holdings. It is, however, exposed to the income received from assets falling and we have therefore applied a margin of 0.25% p.a. to the valuation interest rate
- **Dignity RPI risk** – the Scheme is exposed to the risk that the RPI increases that apply to the Dignity liabilities are greater than expected. In the calculation of this liability, we have therefore added a margin of 0.25% p.a. to the expected future RPI rate

6.7 Impact of the Coronavirus

We have not made any specific adjustments to the calculations as a result of the COVID-19 pandemic. The standard approach implicitly allows for the impact of COVID-19 on mortality in the last 12 months as our mortality calculations use a 5-year rolling average. There are numerous theories and studies on the long-term impact of COVID-19 on long-term mortality, many of them suggesting different outcomes. We are comfortable that the methodology used is prudent for the Scheme.

6.8 New business strain

New business strain occurs when the amount paid into the fund on the sale of a plan, the Mandated Payment, is less than the reserve established to pay out on the death of the member. However, the fixed uplift is now so low that new business strain no longer arises. In fact, a small profit flows from each new plan sold.

In 2020, 275 new plans were written with £1.11m worth of Mandated Payments. The reserves attributed to these plans at the year-end were £1.01m and therefore there was no new business strain for the year, as the reserve amount is £0.10m less than the Mandated Payment. This implies that for every £100 of new business sold the surplus increased by about £10, all other things being equal.

7. Underlying liability to provide funerals to the plan holders

7.1 Approach and assumptions

In addition to valuing the liabilities of the Scheme, where payments are made according to specified formulae, we are required to analyse the "real" liabilities to the plan holders, i.e. the contract to provide a specific funeral. This highlights any difference between the actual amount needed to carry out the funerals and the expected payments from the Trust.

The calculation of this real liability is as follows:

- After discussions with Lodge Bros. (Funerals) Limited, the estimated marginal cost of providing a funeral is £1,975, which is made up of:
  - Average value of fees and disbursements: £1,333
  - Average budget purchases per funeral: £282
  - Other variable costs: £360
- The expected costs of providing funerals each year are projected based on our best estimate of mortality (i.e. excluding the valuation mortality margin) and the following price inflation assumptions provided by Lodge Bros. (Funerals) Limited which have been estimated based on the last five years' management accounts data:
  - Fees and disbursements inflation: 5% p.a.
  - Other funeral cost inflation: 3% p.a.
- From our general market knowledge, these figures appear reasonable. They were certified as reasonable by the board of Family Funerals Trust Limited on 06 April 2021.
- The real liability is calculated to be the discounted value of all these future payments using a discount rate, which reflects the total return expected to be achieved by Lodge Bros. (Funerals) Limited
  - The investment manager's current estimate is that a long-term net of fund charges return of 6.5% p.a. is expected on the Scheme's assets. This seems reasonable considering market expected returns on various asset classes. Nevertheless, for purposes of prudence, we have assumed a long term total net return of 3.5% p.a.. We have then adjusted this for the management charge including VAT (0.48% p.a.) and corporation tax at 23.71% p.a. to produce a discount rate of 2.30% p.a.

7.2 Results

On this basis, the real liability is calculated to be £10.3m, which is £5.1m lower than the valuation liability of £15.4m (excluding the expense reserve) and £6.3m lower than the Scheme's total assets of £16.6m. This means that there are sufficient assets in the Scheme to cover the expected costs of providing the future funerals.

7.3 Reverse stress test

Furthermore, we have conducted "reverse stress testing" on the real liability value by varying the initial estimate of fees and disbursements and its associated inflation assumption. This process investigates the level that each parameter would need to rise to in order to cause the real liability to exceed the valuation liability. The results are as follows:

- Starting fees and disbursements value: £2,249 or
- Fees and disbursements inflation: 7.58% p.a.

The results show that the starting value of the fees and disbursements would need to be greater than £2,249 for the real liability to exceed the valuation liability, an increase of £916 over the current assumption of £1,333.

Alternatively, the inflation assumption would need to be above 7.58% p.a. to cause the real liability to exceed the valuation liability, which is 2.58% p.a. higher than the existing assumption.

These results provide comfort that the valuation liability is sufficient to cover the real underlying liability, even in the event of the adverse circumstances identified above.

7.4 Expected payments

The chart below illustrates the smoothed run-off of the Scheme, based on the following:

- Realistic mortality assumption: 119% of ELT17
- Expected benefit outgo: 105% of Mandated Payments for Non-Dignity plans and future expected RPI for Dignity plans

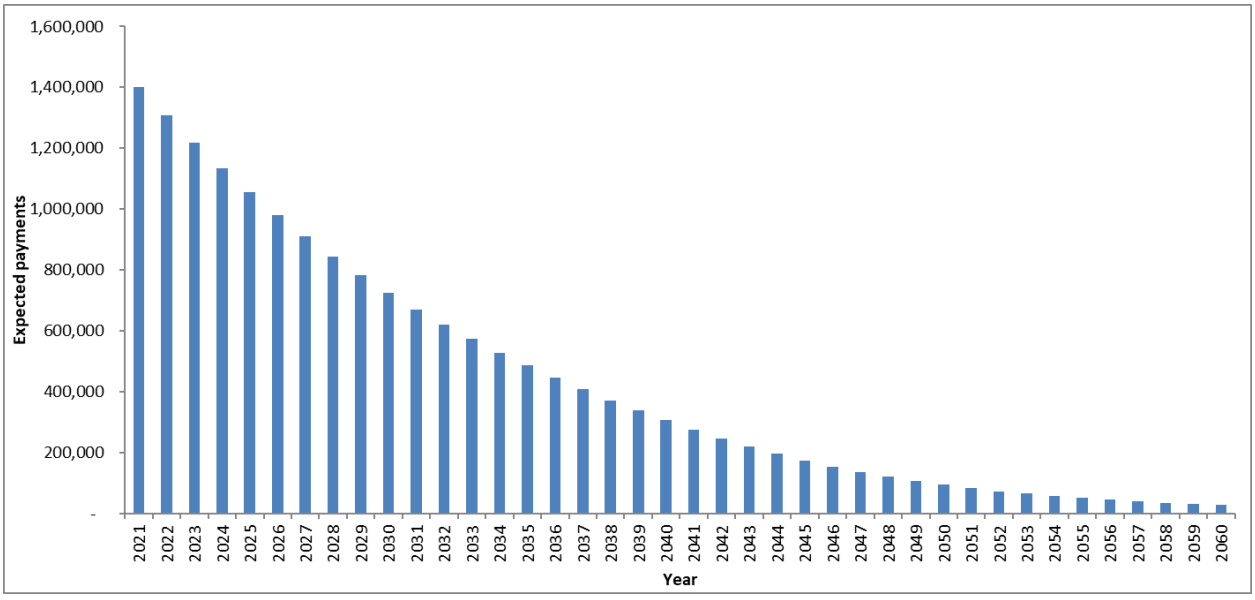


Figure 1: Expected benefit payments (£)

8. Regulatory guidance

We confirm that the valuation has been performed in accordance with the Technical Actuarial Standards relating to Funeral Plans ("TAS 400"), as set by the Financial Reporting Council. We have complied with TAS 100 which covers the standards relating to modelling, data and reporting. We have also complied with the requirements of APS X1, APS X2 and APS Z1, set by the Institute and Faculty of Actuaries, which concern the application of appropriate standards, peer review of actuarial work and actuaries' duties and responsibilities when working with funeral plans respectively.

The Funeral Plans TAS also requires us to provide a neutral estimate of the present value of the future liabilities of the Scheme. Our analysis shows that, at 31 December 2020, the present value of the Scheme's future liabilities, on a neutral basis, amounted to £14,963,890.

9. Reliances and limitations

This report has been prepared for FFTL and the trustees to set out the results of the actuarial valuation of the Scheme as at 31 December 2020 under our letter of engagement dated 15 January 2021. It may not be suitable for use by any other party or for any other purpose. FTI Consulting does not accept any responsibility, duty of care or liability for the use of this report by unintended parties or outside the scope of the purpose mentioned above. This report should not be disclosed to any third party other than with a written agreement from FTI Consulting.

The opinions expressed in this report are valid only for the purpose stated herein and as of the date of this report.

All decisions in connection with the implementation or use of advice or recommendations contained in this report are the sole responsibility of its users. This report does not represent investment advice, nor does it provide an opinion regarding the fairness of any transaction to any and all parties.

We have relied on data and information provided to FTI Consulting as set out in this report which takes no account of developments after that date. FTI Consulting is under no obligation to update the report for any such developments. In particular, reliance has been placed upon, but not limited to, the following:

- Membership data as at 31 December 2020 provided by FFTL
- Asset information as at 31 December 2020 provided by Rathbones
- Data on fees, disbursements and other expense-related items provided by Lodge Bros. (Funerals) Limited

Appendix A

We have made a few minor data corrections, as follows. For the 12 plan holders below with missing dates of birth, we have assigned the average date of birth of the remainder of the membership (25th November 1941).

Plan Code	
BRIN10	MZ1581
BRIN11	MZ1582
BRIN12	MZ1583
MZ1348	MZ1584
MZ1482	MZ1585
MZ1580	PZ1271

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