
WRITTEN NOTICE

Major changes to an approved internal model

To:

Phoenix Life Limited* (FRN 110418)

Phoenix Life Assurance Limited* (FRN 117667)

PA (GI) Limited* (FRN 117668)

Of:

1 Wythall Green Way, Wythall, Birmingham, B47 6WG

Reference Number:

5130563, 5130566, 5130565

And to:

Standard Life Assurance Limited* (FRN 439567)

Standard Life Pension Funds Limited* (FRN 110466)

Of:

Standard Life House, 30 Lothian Road, Edinburgh, EH1 2DH

Reference Number:

5306248, 5306249

(* - the 'firm')

Date:

20 August 2019

Decision

- 1) In accordance with Regulation 48 and 49 of the Solvency II Regulations 2015, the PRA has decided to grant the firm's approval to make changes to the policy for changing an approved internal model ("the Policy"). The Policy was also approved in the Original Notice and subsequently amended as set out in Annex 1.

Reasons for the Decision

- 2) On 10 December 2018, with an addendum on 15 February 2019, the firm applied for a major model change to its partial internal model. The PRA's assessment is that after applying the major model changes set out in the application, as amended, the Phoenix Group Model met the tests and standards as at the time the decision was made. Specifically, the PRA is satisfied that:

- a. The internal model complies with the rules contained in Chapters 2 to 4 and 10 to 15 Solvency Capital Requirement – Internal Models Part of the PRA Rulebook.
- b. The internal model complies with the requirements set out in Title 1 Chapter VI Solvency capital requirement – full and partial internal models of the Commission Delegated Regulation (EU) 2015/35.
- c. The systems of the undertaking for identifying, measuring, monitoring, managing and reporting risk are adequate.
- d. The model complies with the requirements of Title 2 Chapter II Section 2 of the Commission Delegated Regulation (EU) 2015/35.
- e. The policy for changing the approved internal model complies with the rules contained in Chapter 6 of the Solvency Capital Requirement – Internal Models Part of the PRA Rulebook.

Effective date

- 3) The approval at paragraph 1) takes effect on 12 August 2019.

Decision maker

- 4) The decision which gave rise to the obligation to give this Notice was made by Mark Cornelius, Head of Life Insurance Groups Department of the PRA.

Publication

- 5) Details of this approval will be published on the Financial Services Register.

PRA contacts

- 6) For more information concerning this matter generally, the firm should contact their usual supervisory contact.

Mark Cornelius

Head of Life Insurance Groups Department

For and on behalf of the PRA

ANNEX 1

Approval	Date	Description	Written Notices
Approval of a partial internal model	5 December 2015	In accordance with Regulation 48 and 49 of the Solvency 2 Regulations 2015, the Prudential Regulation Authority (the 'PRA') decided to grant Phoenix Life Limited, Phoenix Life Assurance Limited, National Provident Life Limited and PA(GI) Limited approval to use a partial internal model for the calculation of the group and solo Solvency Capital Requirements ('SCR')	2268756 2268757 2268759 2268762
Variation of the partial internal model approval to a full internal model approval	18 December 2015	In accordance with Regulation 48(5)(a) of the Solvency 2 Regulations 2015, the PRA decided to grant Phoenix Life Limited, Phoenix Life Assurance Limited, National Provident Life Limited and PA (GI) Limited a variation of the approval given on 5 December 2015 to reflect the change in scope of the Phoenix Group Model from a partial internal model to a full internal model following the sale of Scottish Mutual International Limited.	2320418 2320419 2320420 2320421
Variation of the full internal model approval to a partial internal model approval	8 November 2016	In accordance with Regulation 48(5)(a) of the Solvency 2 Regulations 2015, the PRA on 1 November 2016 decided to grant Phoenix Life Limited, Phoenix Life Assurance Limited, and PA (GI) Limited a variation of the approval given on 18 December 2015 to reflect the change in scope of the Phoenix Group Model from a full internal model to a partial internal model following the acquisition of AXA Wealth Limited.	3464280 3464285 3464283
Approval to use a partial internal model	1 November 2016	In accordance with Regulations 48 and 49 of the Regulations the, the PRA on 1 November 2016 decided to grant approval to AXA Wealth Limited, a subsidiary undertaking of Phoenix Life Holdings Limited, approval to use the Phoenix Group Model for the purposes of the calculation of part of its group SCR.	3470905
Approval to use a partial internal model	30 December 2016	In accordance with Regulations 48 and 49 of the Regulations the PRA has decided to grant approval to Abbey Life	3871265 3906170 3906171

		Assurance Company Limited, a subsidiary undertaking of Phoenix Life Holdings Limited, approval to use the Phoenix Group Model for the purposes of the calculation of part of its group SCR.	3906172 3906173
Extension of scope	17 March 2017	In accordance with Regulation 48(1)(b) of the Solvency 2 Regulations 2015, the PRA decided to approve a major change to the Phoenix Group Model to extend the scope of the Phoenix Group Model to include AXA Wealth Limited ('AWL') for the purposes of calculating the group SCR and AWL's solo SCR.	3835210 3835212 3835214 3835217 4231537
Change to the policy for changing an approved internal model	17 March 2017	In accordance with Regulation 48(1) (c) of the Solvency 2 Regulations 2015 (2015/575), the PRA has decided to grant the firm approval to make changes to the policy for changing an approved internal model.	3853227 4234889 4234893
Major change to an approved internal model	9 June 2017	In accordance with Regulations 48 and 49 of the Regulations the PRA has decided to approve a major model change to the Phoenix Group Model to extend the scope of the Phoenix Group Model to include and calculate a group SCR at the level of Phoenix Group Holdings for the purposes of enabling Phoenix Life Limited, Phoenix Life Assurance Limited, PA (GI) Limited, AXA Wealth Limited and Abbey Life Assurance Company Limited to calculate their group SCRs at the level of both PGH and Phoenix Life Holdings Limited.	3852845 4640696 4640697 4640698 4640699
Major changes and variations to an approved internal model	1 March 2018	In accordance with the Regulation 48(1)(b) of the Solvency 2 Regulations 2015, the PRA has decided to approve major changes to the Phoenix Group Model to: a. extend the scope of the Phoenix Group Model to include Abbey Life Assurance Company Limited' solo SCR and b. change the methodology and calibrations in respect of Persistency Risk to specifically include Late Retirement Risk In accordance with Regulation 48(5)(a) of the Solvency 2 Regulations 2015, the PRA has also decided to vary the firms'	4792364 4792448 4792449 4792500

		Internal Model Approval to reflect the change in scope of the Phoenix Group Model from a partial internal model to a full internal model In accordance with Regulation 45(5)(a) of the Solvency 2 Regulations 2015, the PRA has also decided to vary the firms' Internal Model Approval to reflect that the firms are no longer required to calculate a group SCR at the level of Phoenix Life Holdings Limited. In accordance with Regulation 48(5)(a) of the Solvency 2 Regulations, the PRA has also decided to vary the firms' Internal Model Approval to reflect the de-authorisation of Phoenix AW Limited on 9 March 2018, such that Phoenix AW Limited is no longer required to calculate a solo SCR.	
Variation of the full internal model approval to a partial internal model approval	31 August 2018	In accordance with Regulation 48(5)(a) of the Solvency 2 Regulations 2015 the PRA has decided to grant Phoenix Life Limited, Phoenix Life Assurance Limited, Abbey Life Assurance Company Limited and PA (GI) Limited a variation of the Internal Model Approval to reflect the change in scope of the Phoenix Group Model from a full internal model to a partial internal model for its calculation of its group SCR following the acquisition of the Standard Life undertakings. In accordance with Regulations 48 and 49 of the Regulations the PRA has decided to grant SLAL and SLPF approval to use the Phoenix Group Model for the purpose of the calculation of part of their group SCR.	4978533 5006531 5006535 5006556 5006557 5006558
Extension of scope of internal model	13 December 2018	In accordance with Regulation 48(5)(a) of the Regulations, the PRA has decided to approve a major model change to the Phoenix Group Model to extend the scope of the Phoenix Group Model to include and calculate a group SCR at the level of Phoenix Group Holdings plc ('New Phoenix'). In accordance with Regulations 48(5)(a) of the Regulations, the PRA has also decided to vary the firms' Internal Model	5071140 5071500 5071501 5071502 5071503 5071504

		Approval to reflect that the firms are no longer required to calculate a group SCR at level of Phoenix Group Holdings ('Old Phoenix'). This reflects the establishment of the ultimate parent, New Phoenix, as the ultimate EEA insurance holding company for the group on 12 December 2018.	
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ANNEX 2

The approved Internal Model

1) The approved internal model is as set out in the internal model application documents submitted to the PRA on 30 June 2015 and the further documents listed in Table 1.

Table 1

Phoenix Group Model Reference	Description	Date
IM0153	The sale of Scottish Mutual International Limited (regulated by the Central Bank of Ireland and registered in Ireland with Company Number 242244).	2 and 11 December 2015
IM0193x	The acquisition of AXA Wealth Limited (FRN: 119201, regulated by the PRA).	24, 27 October 2016 and 1 November 2016
IM0222	The acquisition of Abbey Life Assurance Company Limited (FRN: 117645, regulated by the PRA).	5, 14, and 30 December 2016
IMO193x	Major model change application to extend the scope of the internal model to AXA Wealth Limited (FRN: 119201, regulated by the PRA).	30 November 2016
IMO171x	Major model change application to extend the scope of the internal model to Phoenix Group Holdings	6 December 2016 and 26 May 2017
IMO247x and IMO277x	Major change application to extend the scope of the Internal Model to Abbey Life Assurance Company Limited (FRN: 117645, regulated by the PRA) and to change the methodology and calibrations in respect of Persistency Risk to specifically include Late Retirement Risk.	22 December 2017

IM0318	The acquisition of Standard Life Assurance Limited (FRN 439567) ('SLAL'), Standard Life Pension Funds Limited (FRN 110466) ('SLPF'), insurance undertakings regulated by the PRA, and Standard Life International Designated Activity Company (registered in Ireland under company number 408507) ('SLIDAC'), an insurance undertaking regulated by the Central Bank of Ireland.	3 and 6 July 2018
IMO291	Major model change application to extend the scope of the internal model to Phoenix Group Holdings plc.	23 July 2018
IMA.214.05	Major model change application to change the model governance policy	10 December 2018 and 15 February 2019

2) The partial internal model has been approved to calculate part of the group Solvency Capital Requirement (the 'Group SCR') at the level of Phoenix Group Holdings plc. The entities with a "Yes" in the Group SCR column in table 2 are those which are included in the model in order to calculate the Group SCR.

3) The partial internal model is approved for those entities with a "Yes" in the Solo SCR column in table 2 to calculate their individual Solvency Capital Requirement.

4) The model does not include standard formula integration techniques. Integration techniques are not required as the firms Standard Life Assurance Limited (FRN 439567) and Standard Life Pension Funds Limited (FRN 110466) are required to use Method 2 (Deduction & Aggregation) to incorporate the contributions from entities within the group that are not included in the scope of the partial internal model into the aggregated Group SCR.

5) Changes to the 'Standard Life' internal model are subject to a separate written notice (Ref 5130586, 5130597)

6) Subject to 2) and 4) above, the model is approved to calculate part of the Group SCR at the level of Phoenix Group Holdings plc and the individual SCR for each entity indicated in respect of all material quantifiable risks as at the date of this notice.

Table 2

Legal Entity	FRN	Group SCR ('the undertakings included in the scope of the internal model for the calculation of the group SCR')	Solo SCR
Phoenix Group Holdings plc	N/A	Yes	N/A

Phoenix Life Limited (PLL)	110418	Yes	Yes
Phoenix Life Assurance Limited (PLAL)	117667	Yes	Yes
PA (GI) Limited (PAGI)	117668	Yes	Yes