

Registered number: 06964651

EMPLOYERS' LIABILITY TRACING OFFICE
(A Company Limited by Guarantee)

DIRECTORS' REPORT AND FINANCIAL STATEMENTS
FOR THE YEAR ENDED 31 DECEMBER 2018

EMPLOYERS' LIABILITY TRACING OFFICE
(A Company Limited by Guarantee)

COMPANY INFORMATION

Directors	Steven Browne Ashley Boardman Robert Donovan Grace Flowers Roland Jackson Matthew Lacy Paul Bogle Richard Guest Helen Bancroft
Registered number	06964651
Registered office	Linford Wood House 6-12 Capital Drive Linford Wood Milton Keynes MK14 6XT
Independent auditors	Nexia Smith & Williamson Chartered Accountants & Statutory Auditor 4th Floor Cumberland House 15-17 Cumberland Place Southampton SO15 2BG

EMPLOYERS' LIABILITY TRACING OFFICE
(A Company Limited by Guarantee)

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EMPLOYERS' LIABILITY TRACING OFFICE
(A Company Limited by Guarantee)

DIRECTORS' REPORT
FOR THE YEAR ENDED 31 DECEMBER 2018

The directors present their report and the financial statements for the year ended 31 December 2018.

Principal activity

The activities of the Company are:

- 1) To develop, operate and manage systems and processes capable of recording, capturing and making available on a database such details of employers' liability insurance policies written and/or capable of having effect in the United Kingdom as the membership may determine necessary from time to time and ultimately which are likely to contribute to and assist with the successful tracing of employers liability policies for the mutual benefit of:
 - (a) Claimants that have suffered injury during the course of employment and are unable to trace an employer's insurer for the purposes of pursuing a claim;
 - (b) Insurers seeking to identify other insurers holding employers' liability policies in respect to any claim or potential claim for the purposes of establishing whether any grounds for joint and several liability exist; and
 - (c) Such other individuals, partnerships, associations, bodies or corporations as ELTO may determine from time to time on giving consideration to the objects.
- 2) To take action as may be required to assist in identifying employers operating without such employers' liability insurance as required by law in the United Kingdom.
- 3) To act as arbitrators or mediators or to nominate arbitrators or mediators for the settlement of disputes and to pay, satisfy or compromise any claims made against ELTO which it may seem expedient to pay, satisfy or compromise.

Results

The profit for the year, after taxation, amounted to £Nil (2017 - £Nil).

Directors

The directors who served during the year were:

Steven Browne
Ashley Boardman
Robert Donovan
Anne Griffiths (resigned 11 December 2018)
Grace Flowers (appointed 11 December 2018)
Roland Jackson
Richard Jeffs (resigned 20 June 2018)
Matthew Lacy
Stephen Lewis (resigned 31 January 2018)
Shaun Randell (resigned 11 December 2018)
Paul Bogle (appointed 11 December 2018)

EMPLOYERS' LIABILITY TRACING OFFICE
(A Company Limited by Guarantee)

DIRECTORS' REPORT (CONTINUED)
FOR THE YEAR ENDED 31 DECEMBER 2018

Directors' responsibilities statement

The directors are responsible for preparing the Directors' Report and the financial statements in accordance with applicable law and regulations.

Company law requires the directors to prepare financial statements for each financial year. Under that law the directors have elected to prepare the financial statements in accordance with applicable law and United Kingdom Accounting Standards (United Kingdom Generally Accepted Accounting Practice), including Financial Reporting Standard 102 'The Financial Reporting Standard applicable in the UK and Republic of Ireland'. Under company law the directors must not approve the financial statements unless they are satisfied that they give a true and fair view of the state of affairs of the Company and of the profit or loss of the Company for that period.

In preparing these financial statements, the directors are required to:

- select suitable accounting policies for the Company's financial statements and then apply them consistently;
- make judgements and accounting estimates that are reasonable and prudent;
- prepare the financial statements on the going concern basis unless it is inappropriate to presume that the Company will continue in business.

The directors are responsible for keeping adequate accounting records that are sufficient to show and explain the Company's transactions and disclose with reasonable accuracy at any time the financial position of the Company and to enable them to ensure that the financial statements comply with the Companies Act 2006. They are also responsible for safeguarding the assets of the Company and hence for taking reasonable steps for the prevention and detection of fraud and other irregularities.

Disclosure of information to auditors

Each of the persons who are directors at the time when this Directors' Report is approved has confirmed that:

- so far as the director is aware, there is no relevant audit information of which the Company's auditors are unaware, and
- the director has taken all the steps that ought to have been taken as a director in order to be aware of any relevant audit information and to establish that the Company's auditors are aware of that information.

Post balance sheet events

There have been no significant events affecting the Company since the year end.

Auditors

The auditors, Nexia Smith & Williamson, will be proposed for reappointment in accordance with section 485 of the Companies Act 2006.

EMPLOYERS' LIABILITY TRACING OFFICE
(A Company Limited by Guarantee)

DIRECTORS' REPORT (CONTINUED)
FOR THE YEAR ENDED 31 DECEMBER 2018

Small companies note

In preparing this report, the directors have taken advantage of the small companies exemptions provided by section 415A of the Companies Act 2006.

This report was approved by the board and signed on its behalf.



.....
Steven Browne
Director

Date: 24 July 2019

INDEPENDENT AUDITOR'S REPORT TO THE MEMBERS OF EMPLOYERS' LIABILITY TRACING OFFICE

Opinion

We have audited the financial statements of Employers' Liability Tracing Office (the 'Company') for the year ended 31 December 2018 which comprise the Statement of Comprehensive Income, Balance Sheet and the notes to the financial statements, including a summary of significant accounting policies. The financial reporting framework that has been applied in their preparation is applicable law and United Kingdom Accounting Standards, including FRS 102 "The Financial Reporting Standard applicable in the UK and Republic of Ireland" (United Kingdom Generally Accepted Accounting Practice).

In our opinion, the financial statements:

- give a true and fair view of the state of the Company's affairs as at 31 December 2018 and of its result for the year then ended;
- have been properly prepared in accordance with United Kingdom Generally Accepted Accounting Practice; and
- have been prepared in accordance with the requirements of the Companies Act 2006.

Basis for opinion

We conducted our audit in accordance with International Standards on Auditing (UK) (ISAs (UK)) and applicable law. Our responsibilities under those standards are further described in the Auditor's responsibilities for the audit of the financial statements section of our report. We are independent of the Company in accordance with the ethical requirements that are relevant to our audit of the financial statements in the UK, including the FRC's Ethical Standard, and we have fulfilled our other ethical responsibilities in accordance with these requirements. We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our opinion.

Conclusions relating to going concern

We have nothing to report in respect of the following matters in relation to which the ISAs (UK) require us to report to you where:

- the directors' use of the going concern basis of accounting in the preparation of the financial statements is not appropriate; or
- the directors have not disclosed in the financial statements any identified material uncertainties that may cast significant doubt about the Company's ability to continue to adopt the going concern basis of accounting for a period of at least twelve months from the date when the financial statements are authorised for issue.

**INDEPENDENT AUDITOR'S REPORT TO THE MEMBERS OF EMPLOYERS' LIABILITY TRACING OFFICE
(CONTINUED)**

Other information

The other information comprises the information included in the Directors' Report and Financial Statements, other than the financial statements and our auditor's report thereon. The directors are responsible for the other information. Our opinion on the financial statements does not cover the other information and, except to the extent otherwise explicitly stated in our report, we do not express any form of assurance conclusion thereon.

In connection with our audit of the financial statements, our responsibility is to read the other information and, in doing so, consider whether the other information is materially inconsistent with the financial statements or our knowledge obtained in the audit or otherwise appears to be materially misstated. If we identify such material inconsistencies or apparent material misstatements, we are required to determine whether there is a material misstatement in the financial statements or a material misstatement of the other information. If, based on the work we have performed, we conclude that there is a material misstatement of this other information, we are required to report that fact.

We have nothing to report in this regard.

Opinion on other matters prescribed by the Companies Act 2006

In our opinion, based on the work undertaken in the course of the audit:

- the information given in the Directors' Report for the financial year for which the financial statements are prepared is consistent with the financial statements; and
- the Directors' Report has been prepared in accordance with applicable legal requirements.

Matters on which we are required to report by exception

In the light of the knowledge and understanding of the Company and its environment obtained in the course of the audit, we have not identified material misstatements in the Directors' Report.

We have nothing to report in respect of the following matters where the Companies Act 2006 requires us to report to you if, in our opinion:

- adequate accounting records have not been kept, or returns adequate for our audit have not been received from branches not visited by us; or
- the financial statements are not in agreement with the accounting records and returns; or
- certain disclosures of directors' remuneration specified by law are not made; or
- we have not received all the information and explanations we require for our audit; or
- the directors were not entitled to prepare the financial statements in accordance with the small companies regime and take advantage of the small companies' exemption in preparing the directors' report and from the requirement to prepare a strategic report.

Responsibilities of Directors

As explained more fully in the directors' responsibilities statement set out on page 2, the directors are responsible for the preparation of the financial statements and for being satisfied that they give a true and fair view, and for such internal control as the directors determine is necessary to enable the preparation of financial statements that are free from material misstatement, whether due to fraud or error.

In preparing the financial statements, the directors are responsible for assessing the Company's ability to continue as a going concern, disclosing, as applicable, matters related to going concern and using the going concern basis of accounting unless the directors either intend to liquidate the Company or to cease operations, or have no realistic alternative but to do so.

**INDEPENDENT AUDITOR'S REPORT TO THE MEMBERS OF EMPLOYERS' LIABILITY TRACING OFFICE
(CONTINUED)**

Auditor's responsibilities for the audit of the financial statements

Our objectives are to obtain reasonable assurance about whether the financial statements as a whole are free from material misstatement, whether due to fraud or error, and to issue an auditor's report that includes our opinion. Reasonable assurance is a high level of assurance, but is not a guarantee that an audit conducted in accordance with ISAs (UK) will always detect a material misstatement when it exists. Misstatements can arise from fraud or error and are considered material if, individually or in the aggregate, they could reasonably be expected to influence the economic decisions of users taken on the basis of these financial statements.

A further description of our responsibilities for the audit of the financial statements is located on the Financial Reporting Council's website at: www.frc.org.uk/auditorsresponsibilities. This description forms part of our auditor's report.

Use of our report

This report is made solely to the Company's members, as a body, in accordance with Chapter 3 of Part 16 of the Companies Act 2006. Our audit work has been undertaken so that we might state to the Company's members those matters we are required to state to them in an auditor's report and for no other purpose. To the fullest extent permitted by law, we do not accept or assume responsibility to anyone other than the Company and the Company's members as a body, for our audit work, for this report, or for the opinions we have formed.

Nexia Smith & Williamson

Christopher Appleton (Senior Statutory Auditor)

for and on behalf of

Nexia Smith & Williamson

Chartered Accountants
Statutory Auditor

4th Floor Cumberland House
15-17 Cumberland Place
Southampton
SO15 2BG

Date: *23.9.19*

EMPLOYERS' LIABILITY TRACING OFFICE
(A Company Limited by Guarantee)

STATEMENT OF COMPREHENSIVE INCOME
FOR THE YEAR ENDED 31 DECEMBER 2018

	Note	2018 £	<i>As restated</i> 2017 £
Turnover		2,338,291	2,328,285
Gross profit		2,338,291	2,328,285
Administrative expenses		(2,338,026)	(2,327,991)
Operating profit	3	265	294
Interest payable and expenses	5	(265)	(294)
Profit for the financial year		-	-

There was no other comprehensive income for 2018 (2017:£Nil).

The notes on pages 9 to 14 form part of these financial statements.

EMPLOYERS' LIABILITY TRACING OFFICE
(A Company Limited by Guarantee)
REGISTERED NUMBER:06964651

BALANCE SHEET
AS AT 31 DECEMBER 2018

	Note	2018 £	As restated 2017 £
Current assets			
Debtors: amounts falling due within one year	7	1,302,843	573,168
Cash at bank and in hand	8	232,512	137,173
		<u>1,535,355</u>	<u>710,341</u>
Creditors: amounts falling due within one year	9	(1,535,355)	(710,341)
Net current assets		-	-
Total assets less current liabilities		-	-
Net assets		-	-
Capital and reserves		-	-

The financial statements have been prepared in accordance with the provisions applicable to companies subject to the small companies regime and in accordance with the provisions of FRS 102 Section 1A - small entities.

The financial statements were approved and authorised for issue by the board and were signed on its behalf by:



.....
Steven Browne
 Director

Date: 24 July 2019

The notes on pages 9 to 14 form part of these financial statements.

EMPLOYERS' LIABILITY TRACING OFFICE
(A Company Limited by Guarantee)

NOTES TO THE FINANCIAL STATEMENTS
FOR THE YEAR ENDED 31 DECEMBER 2018

1. General information

Employers' Liability Tracing office is a company, limited by guarantee, domiciled and incorporated in England and Wales. The registered office address and registered number can be found on the Company Information page.

The Company's functional and presentational currency is GBP.

2. Accounting policies

2.1 Basis of preparation of financial statements

The financial statements have been prepared under the historical cost convention unless otherwise specified within these accounting policies and in accordance with Section 1A of Financial Reporting Standard 102, the Financial Reporting Standard applicable in the UK and the Republic of Ireland and the Companies Act 2006.

The following principal accounting policies have been applied:

2.2 Going concern

The Directors have made an assessment in preparing these financial statements as to whether the Company is a going concern and have concluded that there are no material uncertainties that may cast doubt on the Company's ability to continue as a going concern.

2.3 Turnover

Turnover represents contributions received or receivable from members. Turnover has been recognised during the year based on the amount the company is entitled to invoice by way of a levy which in turn is based on the costs incurred by the company (paid and accrued). This reflects the articles of association, under which the company is entitled to recharge all costs on to members.

Other income recognised in turnover is generated from data integrity audits this is recognised on completion of the audit work.

2.4 Tangible fixed assets

Tangible fixed assets under the cost model are stated at historical cost less accumulated depreciation and any accumulated impairment losses. Historical cost includes expenditure that is directly attributable to bringing the asset to the location and condition necessary for it to be capable of operating in the manner intended by management.

EMPLOYERS' LIABILITY TRACING OFFICE
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NOTES TO THE FINANCIAL STATEMENTS
FOR THE YEAR ENDED 31 DECEMBER 2018

2. Accounting policies (continued)

2.4 Tangible fixed assets (continued)

Depreciation is charged so as to allocate the cost of assets less their residual value over their estimated useful lives, using the straight-line method.

Depreciation is provided on the following basis:

Office equipment	- 3 years straight line
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The assets' residual values, useful lives and depreciation methods are reviewed, and adjusted prospectively if appropriate, or if there is an indication of a significant change since the last reporting date.

Gains and losses on disposals are determined by comparing the proceeds with the carrying amount and are recognised in the Statement of Comprehensive Income.

2.5 Financial instruments

Financial assets and financial liabilities are recognised in the Balance Sheet when the Company becomes a party to the contractual provisions of the instrument.

Trade and other debtors and creditors are classified as basic financial instruments and measured at initial recognition at transaction price. Debtors and creditors are subsequently measured at amortised cost using the effective interest rate method. A provision is established when there is objective evidence that the Company will not be able to collect all amounts due.

Cash and cash equivalents are classified as basic financial instruments and comprise cash in hand and at bank, short-term bank deposits with an original maturity of three months or less and bank overdrafts which are an integral part of the Company's cash management.

Financial liabilities and equity instruments issued by the Company are classified in accordance with the substance of the contractual arrangements entered into and the definitions of a financial liability and an equity instrument. An equity instrument is any contract that evidences a residual interest in the assets of the Company after deducting all of its liabilities. Equity instruments issued by the Company are recorded at the proceeds received, net of direct issue costs.

Interest bearing bank loans, overdrafts and other loans which meet the criteria to be classified as basic financial instruments are initially recorded at the present value of cash payable to the bank, which is ordinarily equal to the proceeds received net of direct issue costs. These liabilities are subsequently measured at amortised cost, using the effective interest rate method.

2.6 Finance costs

Finance costs are charged to the Statement of Comprehensive Income over the term of the debt using the effective interest method so that the amount charged is at a constant rate on the carrying amount. Issue costs are initially recognised as a reduction in the proceeds of the associated capital instrument.

EMPLOYERS' LIABILITY TRACING OFFICE
(A Company Limited by Guarantee)

NOTES TO THE FINANCIAL STATEMENTS
FOR THE YEAR ENDED 31 DECEMBER 2018

2. Accounting policies (continued)

2.7 Prior year restatement

The Company has restated its turnover, administrative expenses, accruals and accrued income. The nature and quantum of these adjustments are explained in note 13

3. Operating profit

The operating profit is stated after charging:

	2018	2017
	£	£
Fees payable to the Company's auditor and its associates for the audit of the Company's annual financial statements	<u>10,400</u>	<u>10,100</u>

4. Employees

The Company has no employees other than the directors, who did not receive any remuneration (2017 - £Nil).

5. Interest payable and similar expenses

	2018	2017
	£	£
Bank interest payable	<u>265</u>	<u>294</u>
	<u>265</u>	<u>294</u>

EMPLOYERS' LIABILITY TRACING OFFICE
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NOTES TO THE FINANCIAL STATEMENTS
FOR THE YEAR ENDED 31 DECEMBER 2018

6. Tangible fixed assets

	Office equipment £
Cost or valuation	
At 1 January 2018	3,185
At 31 December 2018	3,185
Depreciation	
At 1 January 2018	3,185
At 31 December 2018	3,185
Net book value	
At 31 December 2018	-
<i>At 31 December 2017</i>	-

7. Debtors

	2018 £	<i>As restated</i> 2017 £
Trade debtors	1,273,377	464,596
Other debtors	3,583	2,241
Prepayments and accrued income	25,883	106,331
	1,302,843	573,168

8. Cash and cash equivalents

	2018 £	2017 £
Cash at bank and in hand	232,512	137,173

EMPLOYERS' LIABILITY TRACING OFFICE
(A Company Limited by Guarantee)

NOTES TO THE FINANCIAL STATEMENTS
FOR THE YEAR ENDED 31 DECEMBER 2018

9. Creditors: Amounts falling due within one year

	2018	<i>As restated</i>
	£	<i>2017</i>
		<i>£</i>
Trade creditors	1,293,002	505,803
Accruals and deferred income	242,353	204,538
	<u>1,535,355</u>	<u>710,341</u>

10. Financial instruments

	2018	<i>As restated</i>
	£	<i>2017</i>
		<i>£</i>
Financial assets		
Cash and cash equivalents	232,512	137,173
Financial assets that are debt instruments measured at amortised cost	1,275,618	544,599
	<u>1,508,130</u>	<u>681,772</u>
Financial liabilities		
Financial liabilities measured at amortised cost	<u>(1,338,014)</u>	<u>(640,540)</u>

Financial assets measured at amortised cost comprise trade debtors, other debtors and accrued income.

Financial liabilities measured at amortised cost comprise trade creditors and accruals.

11. Company status

The Company is a private company limited by guarantee and consequently does not have share capital. Each of the members is liable to contribute an amount not exceeding £10 towards the assets of the Company in the event of liquidation.

12. Related party transactions

A member of the board of Employers' Liability Tracing Office is also board member of an insurance company that utilises the ELTO database. The insurance company pay a levy to ELTO and the transactions are carried out on an arm's length basis. The board member's involvement grants no benefit to the individual or their associated entities.

**EMPLOYERS' LIABILITY TRACING OFFICE
(A Company Limited by Guarantee)**

**NOTES TO THE FINANCIAL STATEMENTS
FOR THE YEAR ENDED 31 DECEMBER 2018**

13. Prior year restatement

Prior year turnover and administrative expenses have been increased by £77,762 for database integrity income which was incorrectly excluded from the 31 December 2017 financial statements. Accrued income and accruals have been restated by the same amount.

14. Controlling party

Given the fact that the Company is limited by guarantee, there is no controlling party.

EMPLOYERS' LIABILITY TRACING OFFICE
(A Company Limited by Guarantee)

APPENDIX I

**REPORT BY THE DIRECTOR OF EMPLOYERS' LIABILITY TRACING OFFICE LIMITED ("ELTO") ON THE
REQUIREMENTS OF ICOBS 8.4.9 AS SET OUT IN THE FCA HANDBOOK IN RESPECT OF THE YEAR
ENDED 31 DECEMBER 2018**

Directors' Statement

In accordance with the requirements in ICOBS 8.4.9R(7)(a) of the Financial Conduct Authority ("FCA") Handbook effective as at 31 December 2018, the board of directors of the Employers' Liability Tracing Office ("ELTO") are able to confirm that for the year to 31 December 2018, ELTO complied in all material respects with the requirements in ICOBS 8.4.9R(1) to (6).

The financial statements were approved and authorised for issue by the board and were signed on its behalf.


Steven Browne
Director

Date: 24 July 2019

EMPLOYERS' LIABILITY TRACING OFFICE

(A Company Limited by Guarantee)

APPENDIX II

INDEPENDENT ASSURANCE REPORT TO THE DIRECTORS OF EMPLOYERS' LIABILITY TRACING OFFICE ON THE REQUIREMENTS OF ICOBS 8.4.9 OF THE FCA HANDBOOK IN RESPECT OF THE YEAR ENDED 31 DECEMBER 2018

1. In accordance with the terms of our letter of engagement dated 4 April 2018, we have been commissioned by the directors of Employers' Liability Tracing Office Limited ("the Company") to perform an independent reasonable assurance engagement in respect of the requirements of ICOBS 8.4.9 of the FCA Handbook effective as at 31 December 2018. ICOBS 8.4.9 requires an auditor satisfying the requirements of SUP 3.4 and SUP 3.8.5 R to SUP 3.8.6 R, to provide an independent assurance report to the directors of the Company addressing the accuracy and completeness of the Database as defined in paragraph 2 below for the year ended 31 December 2018.
2. The database maintained by the Company comprises information provided to it by the members of Employers' Liability Tracing Office ("the Underwriters"). Under the FCA regulations (ICOBS 8.4), it is the responsibility of the Underwriters to ensure that information provided to the Company is accurate and complete. Underwriters provide information to the Company by uploading their own information onto the database. The Company then has responsibility to ensure that it maintains a database which accurately and reliably stores information submitted to it by the Underwriters for the purpose of complying with the FCA regulations and has systems which can adequately keep it up to date in the light of new information provided to the Company by the Underwriters. Any reference in this report to accuracy and completeness of the Company's database relates only to the accurate and complete maintenance of data uploaded to the database by the Underwriters.
3. For the purposes of this report, a 'material error' is an error in a data field which would significantly affect the outcome of a search by an external user of the database. We have determined for the purposes of this report that materiality is defined as the occurrence of errors at a rate of 1% or more in the specific population which is subject to a test or other procedure.

Respective responsibilities of the Directors and Nexia Smith & Williamson

4. The Directors of the Company are responsible for the Company's policies for the accuracy and completeness of the Database and for ensuring that the Company complies with all relevant requirements of the FCA including those of ICOBS 8.4.9 in order to meet the requirement of a Qualifying Tracing Office.
5. The Directors of the Company are responsible for preparing a certificate stating whether the Company has complied with the requirements in ICOBS 8.4.9 (1) to (6) in relation to the year ended 31 December 2018. The directors have included their report in this published annual report.
6. As set out in paragraph 1, our responsibility is to form an independent opinion based on our assurance procedures, addressing the accuracy and completeness of the database for the year ended 31 December 2018.
7. This report, including our opinion, has been prepared for the Company to assist the Directors in complying with ICOBS 8.4.9 of the FCA Handbook. As required by ICOBS 8.4.7 1(b), we permit the disclosure of this report by the Directors in their published annual report to enable the Directors to demonstrate they have discharged their governance responsibilities by commissioning an independent assurance report in connection with those requirements of ICOBS 8.4.9 that relate to the accuracy and completeness of the Company's database. To the fullest extent permitted by law, we do not accept or assume responsibility to anyone other than the Company for our work or this report save where terms are expressly agreed in advance and with our prior consent in writing.

EMPLOYERS' LIABILITY TRACING OFFICE

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Scope of assurance work

8. We conducted our reasonable assurance engagement in accordance with International Standard on Assurance Engagements – 'ISAE 3000 (Revised), Assurance Engagements Other than Audits or Reviews of Historical Financial Information' issued by the International Auditing and Assurance Standards Board.
9. Our work included examination, on a test basis, of evidence relevant to the accuracy and completeness of the Database for the year ended 31 December 2018. We planned and performed our work so as to obtain all the information and explanations which we considered necessary in order to provide us with sufficient evidence on which to base our opinion in respect of the accuracy and completeness of the Database for the year ended 31 December 2018.

Our work included the following procedures:

- Making enquiries of relevant management;
- Evaluating the design and implementation of the key processes and controls for the accuracy and completeness of the database for the year ended 31 December 2018;
- Testing, on a sample basis, the preparation and maintenance of the Database using a combination of compliance and substantive procedures; and
- Obtaining written representations from management.

Inherent and other limitations

10. Non-financial information is subject to more inherent limitations than financial information, given the characteristics of the subject matter and the methods used for determining such information. The absence of a significant body of established practice on which to draw allows for the selection of different but acceptable assessment and evaluation techniques which can result in materially different outcomes and conclusions and can affect comparability. The precision of different assessment and evaluation techniques may also vary. Furthermore, the nature and methods to determine such information, as well as the assessment and evaluation criteria and precision thereof may change over time.

Our reference to accuracy and completeness of the Company's database relates only to the accurate and complete maintenance of data uploaded to the database by the Underwriters. Accordingly, our assurance work has not included an examination of the data uploaded to the database by those firms required to maintain an employers' liability register under ICOBS 8.4.4 of the FCA Handbook.

Our assurance work has not included examination of the derivation of the information contained within such employers' liability registers nor upon any other third party information.

Conclusion

Based on the results of our procedures, in our opinion, the database is complete and accurate in all material aspects as regards to the maintenance of data uploaded to the Database by the Underwriters, at the year ended 31 December 2018, and that there are systems in place which can adequately keep the database up to date in the light of new information provided by the Underwriters, in accordance with the requirements of ICOBS 8.4.9 of the FCA Handbook.

Nexia Smith & Williamson

Nexia Smith & Williamson
Cumberland House,
15-17 Cumberland Place,
Southampton,
SO15 2BG

Date: 23.09.19