

ELTO Employers' Liability
Tracing Office

ELTO
ANNUAL
REPORT
2016



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The ELTO service was introduced by the insurance industry in 2011 to make it easier to search for Employer's Liability (EL) insurance policies using a central database, 6 years on we are continuing to see improved search success results reaching 90.9% overall in 2016 an improvement of 3.8% on 2015. This is really the key performance indicator for ELTO as helping claimants identify the correct insurer for their employer is at the heart of what ELTO was set up to do.

During 2016 the level of enquiries made through ELTO has for the first time fallen, 207,872 enquiries were made, this is a drop of 31%. This drop has been seen in the volume of noise induced hearing loss (NIHL) enquiries made and importantly is not a reflection of the service ELTO delivers, but more an industry trend as members have also reported a decline in the volume of NIHL claims following the high repudiation rate related to these claims in 2015/16.

Whilst the volume of enquiries has fallen for NIHL enquiries, we continue to see the same volume of mesothelioma and asbestos related enquiries as in previous years, encouragingly the search success for these types of enquiries continues to improve reaching over 80% in 2016. The important metric that we highlight each year and use as a benchmark of the success of ELTO is the success rate of individual claimants finding an EL policy through ELTO. I am pleased to note that there has been further improvements in 2016 with the performance increasing to 95.3% of potential claimants identifying an insurer when using the service, a 1.6% increase on 2015. The improvement in search success demonstrates the value of having a database of c.20million records and reflects the tracing efforts of ELTO's members.

Whilst search success is continuing to improve, the industry is keen to ensure that the database is future proofed by using the employers reference number (ERN) as a unique ID to search for policy records. Encouragingly during 2016 we have made significant progress with HMRC in our discussions to have access to ERN data. Open discussions have taken place with HMRC over a technical solution for access to their data and importantly we have made significant strides to having the appropriate legislative

gateway in place to allow us that access. At the time of writing this report the Digital Economy Act had been amended to allow ELTO access to data. This means we can now have further meaningful discussions with HMRC about accessing their data and progress a proof of concept exercise. This is very significant for the industry as to date ERN capture by members continues to be problematic. Whilst ELTO members continue to put a lot of time and effort into capturing the ERN, 2016 saw a small decrease in performance to 52.7%; it is crucial that we continue our engagement with HMRC to get access to ERN data.

Time to supply performance dropped to 86.3%. Whilst not the progress ELTO wanted to make on this front it should be noted that in the majority of cases time to supply will have been impacted by members loading data which was not previously on the Employers' Liability Database (ELD). Although it has impacted the time to supply performance this does however make the ELD more complete and accurate for search purposes. This is reflected in the success rates achieved on post 2011 enquiries to the EL database which currently sits at 97.8%.

ELTO remains committed to ensuring that it helps its members comply with regulatory obligations and to helping as many claimants as possible to find an insurer and we will continue to make this our priority in 2017.



Stephen Lewis, Chairman

ELTO's vision is to provide an excellent service that gives claimants and their representatives quick and easy access to a database of EL policies through an online enquiry facility, helping them to find their employers EL insurer(s).

To ensure the realisation of the ELTO vision the ELTO Board agreed a specific programme of work for 2016 to support this goal. The programme of work agreed was to support the following operational activities:

- ▶ ELD system development, security and stability
- ▶ Continuing to improve search success and timeliness
- ▶ Supporting members compliance with existing and regulatory requirements
- ▶ Continuing to listen to our user community and making improvements to the tracing service.

ELD system development, security and stability

The 2016 plan focused on ensuring the stability and security of the employers liability database (ELD) therefore the following work streams were developed.

Technical Design Authority (TDA) Roadmap

The Technical Design Authority (TDA) consists of Tracing Services Ltd team and Sopra Steria Ltd. The primary objective of this group is to ensure that the ELD is fit for purpose. In early 2016 they produced a technical roadmap detailing initiatives that would enhance the stability of the database and its supported applications.

Benefits achieved

Upgrades to the service delivered in 2016 will ensure that the ELD is operating on the relevant and supported network services available.

Registrations Improvements Project

As part of improving the security of the ELD a risk assessment was carried out which identified six high risk vulnerabilities in the processes and systems for managing registrations and user access. The registration improvements project was set up in 2016 to resolve the issues and implemented the following changes in Q1 2017:

- ▶ Password reset controls
- ▶ Revoking access of inactive users
- ▶ Upgrading to Recaptcha v2
- ▶ Validation of one off users of the service
- ▶ Logging and monitoring of user activity

Benefits achieved

Developing these changes has meant stronger security and compliance controls to ensuring robust ELD access is maintained.

Central Additional Tracing

In August 2016 a central additional insurer identification service for mesothelioma claims was piloted with ELTO members. The intention was to ease the burden of locating other insurers on risk during an exposure period where the insurer itself had loaded most of its records onto the ELD. Whilst a number of members expressed an interest in the service the take up level was very low and therefore the ELTO Board decided that the pilot should not be progressed.



Supporting members compliance with existing regulatory requirements

HMRC Dialogue

Throughout 2016 a number of discussions took place to define the data ELTO needed access to and why. In May ELTO completed a HMRC data request pro-forma setting out the reasons why access to ERN data is required. HMRC viewed the data request pro-forma as a starting point for discussions to begin on why access was needed. ELTO explained the reasons as to why access to ERN data was required and provided clarification to the HMRC on why the ERN data would be useful.

HMRC confirmed that when they consider these types of data requests they look at the proportionality of the request, for example the costs, potential impact, whether there is a legislative framework in place, also any potential DPA implications. It was agreed that they would carry out a proof of concept exercise. ELTO agreed and suggested that it was also worth looking at data that had ERN's to confirm the ERN's were correct as well as blank data.

Alongside the discussions on how data could be accessed there has also been progress on giving ELTO the appropriate legal gateway to access the data. HMRC suggested that an amendment be made to the Digital Economy Bill to allow ELTO access.

In early 2017 an amendment was tabled to the bill to give ELTO access to HMRC data via an enabling clause and the bill gained royal ascent in April 2017. Work is now progressing with HMRC to move forward a proof of concept exercise.

The progress made to date is very encouraging and ELTO will continue to progress this work in 2017.

Continuing to listen to our user community and making improvements to the tracing service to ensure that ELTO can realise its vision

ELTO has conducted an annual customer survey since 2012 and used the feedback to inform areas for improvements that can be made to the tracing service.

The 2016 user survey was sent to 1468 individual e-mail addresses during October 2016. This was slightly lower than the 2015 survey but reflects in the lower number of enquiries that are now being made. A total of 225 responses were received, giving a response rate of 15% compared to a response rate of 5.4% for 2015. The member survey was sent to approximately 170 individual e-mail addresses during October 2016. A total of 70 responses were received, giving a response rate of 41%, this is also an improvement on 2015 when we received an 18% response rate.

It is pleasing to see the response rates for both surveys improve as the feedback received is key to the ongoing development of the tracing service and helps to highlight areas of improvement and ultimately achieve the strategic objectives.

For each survey a Net Satisfaction Score is produced. The Net satisfaction score is calculated by taking the Negative score away from the Positive score for each question.

User survey

Overall the 2016 survey produced a Net Satisfaction Result of 57%, this is the third year in a row where the score has improved.

The key themes which emerged from the survey were:

Simple search results

Overall results show the levels of satisfaction have risen, the simple search functionality is performing well with a 78% net satisfaction score. However respondents also highlighted the requirement to input 'too much data' is a hindrance to their search effectiveness.

A review has begun of the simple search functionality with the aim of identifying areas for improvement, for example pre-populating data fields where possible. Further feedback on this work will be provided in Q2.

Extended search

Extended search continues to be highlighted as an area of concern by users. In particular the length of time taken to respond to queries.

Significantly results show that for 2016 there was an improvement in the satisfaction score for extended search. However ELTO recognises that this continues to be an area where improvements can be made and ELTO members are keen to play an active part in this search process.

Members

Overall the survey highlighted that the service is working well with an overall net satisfaction score of 69%, this is a 13% improvement on the 2015 score. This is a significant achievement, however the ELTO Board are keen to continue their investment in the service and have asked that further work be done to continue to improve/maintain this score.

Audit

The ELTO tracing audit programme was introduced in July 2012, assessing the extent to which members comply with the requirements of the ELTO Tracing Policy, through either an historic tracing or upload audit.

The cumulative sum of all member tracing audit scores is aggregated and market-weighted to provide an overall measure (Tracing Audit KPI) of the industry's tracing performance. The first cycle of tracing audits was completed at the end of 2014 with a KPI of 56.2% and the second in the third quarter of 2016 with a KPI of 66.5%. The third cycle of tracing audits for 127 Members is on course for completion by the end of 2017 and is expected to show a further improvement in performance. Members who have achieved a green upload were not required to be included in the audit process as they had already achieved the audit requirement.

The tracing audits focus on two main areas – the identification of available records and the quality of the tracing process. Members are continuing to identify their records and convert them into searchable formats.

Members continue to support the audit process, with management actions and implementation dates agreed for the majority of recommendations. The ELTO Audit Team follows up agreed actions to see that they are implemented, with visibility on progress provided to the ELTO Board.

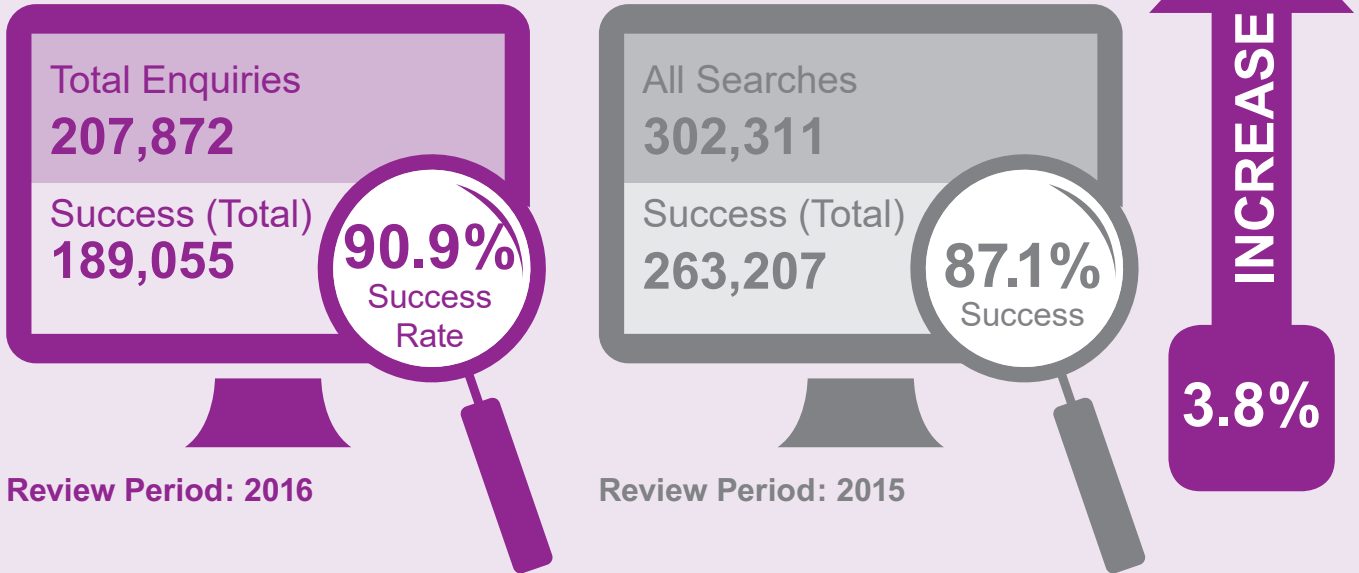
Under the terms of the ELTO-FCA Co-operation Agreement the FCA continue to receive the results of all tracing and upload audits as well as all red-rated audit reports with any others provided on request.

In June 2016 the FCA published a modification by consent recognising ELTO as eligible to issue ICOBS 8.4.4R (1) reports (Data Assurance Reports) in respect of current records. In 2017, ELTO is providing these services to those Members that have requested it do so.

Financial overview

The ELTO budget for 2016 was set with the base figure of £2.1 million. This reflected an increase of £200k on the 2015 levy due to a refund given in 2015 for the collected ERN levy funds which was ultimately not spent.

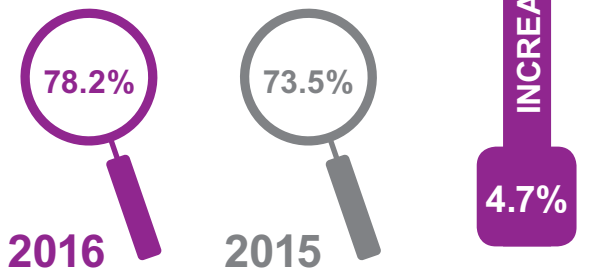
Overall search enquiry success rate



By result type

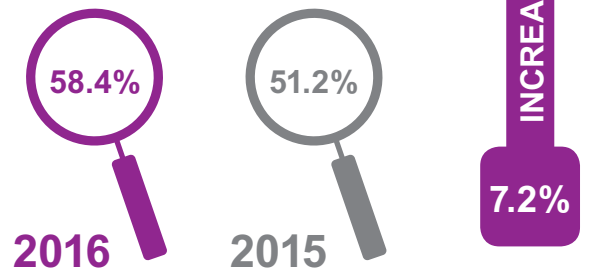
Simple Search enquiry

Successful enquiries immediately obtained from the database.



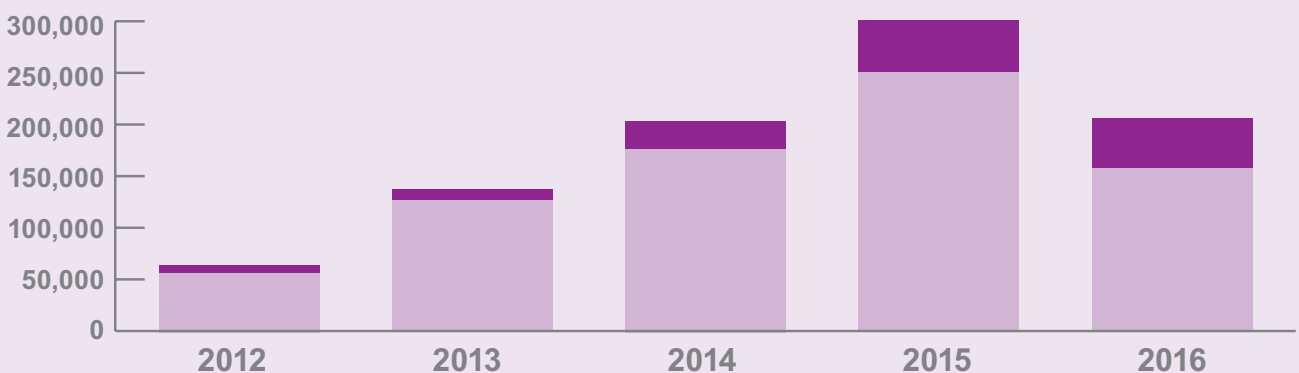
Extended Search enquiry

Successful enquiries obtained from members searching their records.



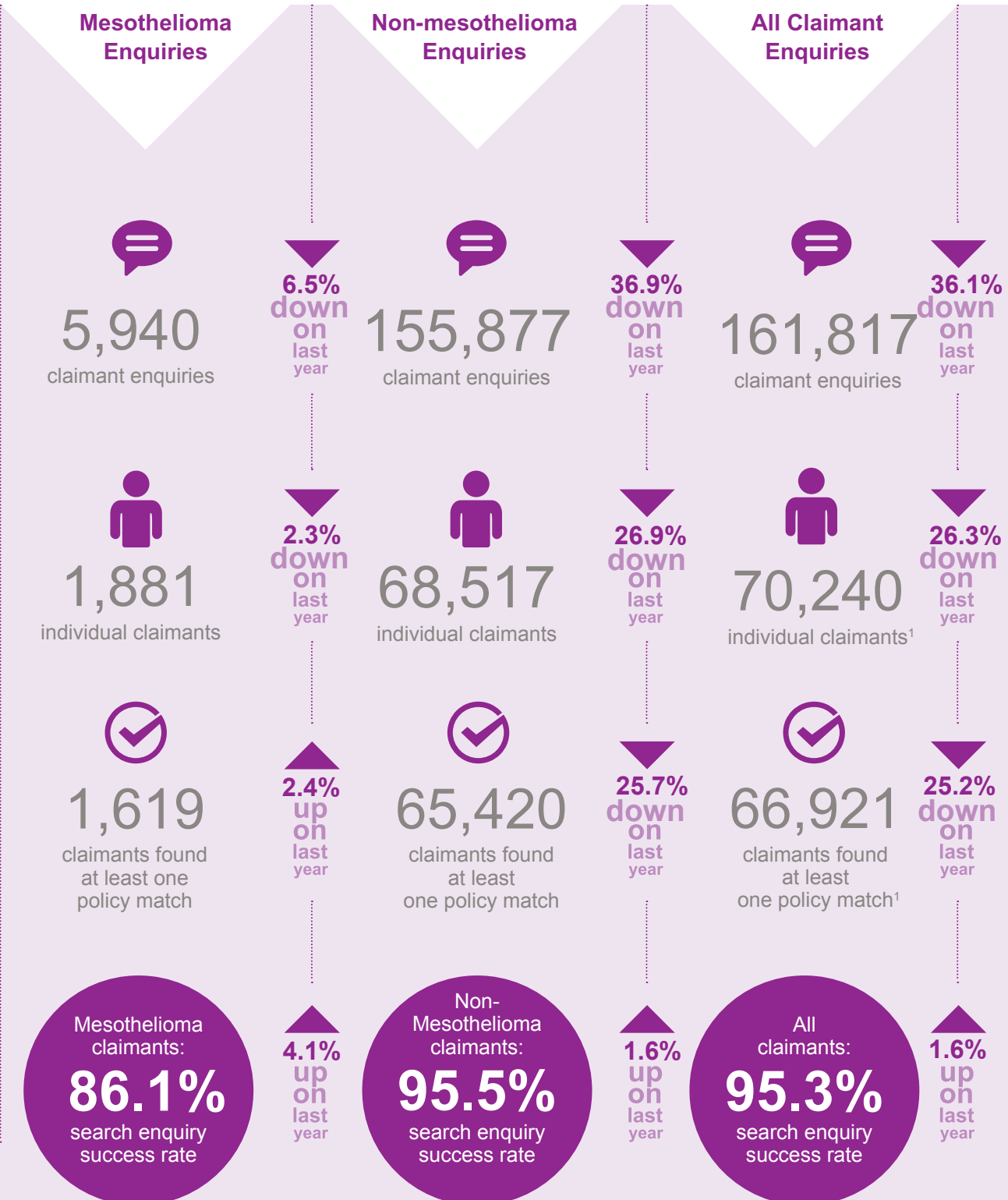
Accident and disease search enquiries

■ Disease ■ Accident



Claimant search enquiry success rate

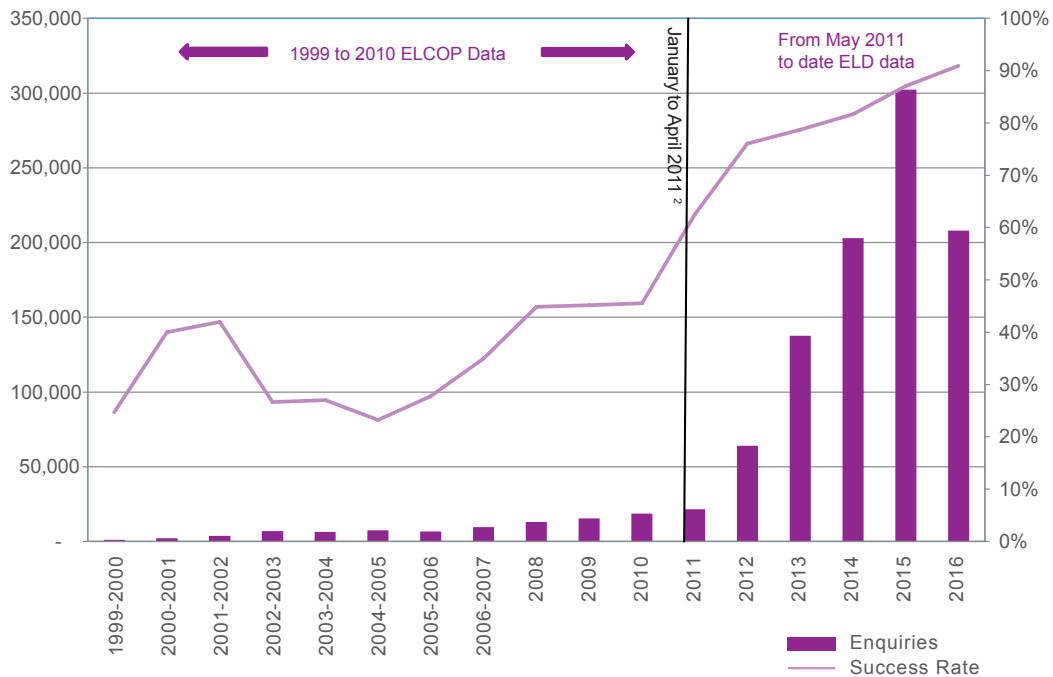
The volume of enquiries made during 2016 through ELTO has fallen for the first time and this is reflected in the figures below.



1) The same individual claimant can appear in both the Mesothelioma and Non-Mesothelioma category.

ELCOP/ELTO enquiries and success rate trends

ELTO replaced the previous voluntary Employers' Liability Code of Practice (ELCOP) tracing service, which was in place since 1999 and helped around 20,000 claimants trace the Employers' Liability (EL) insurer to pursue a claim.

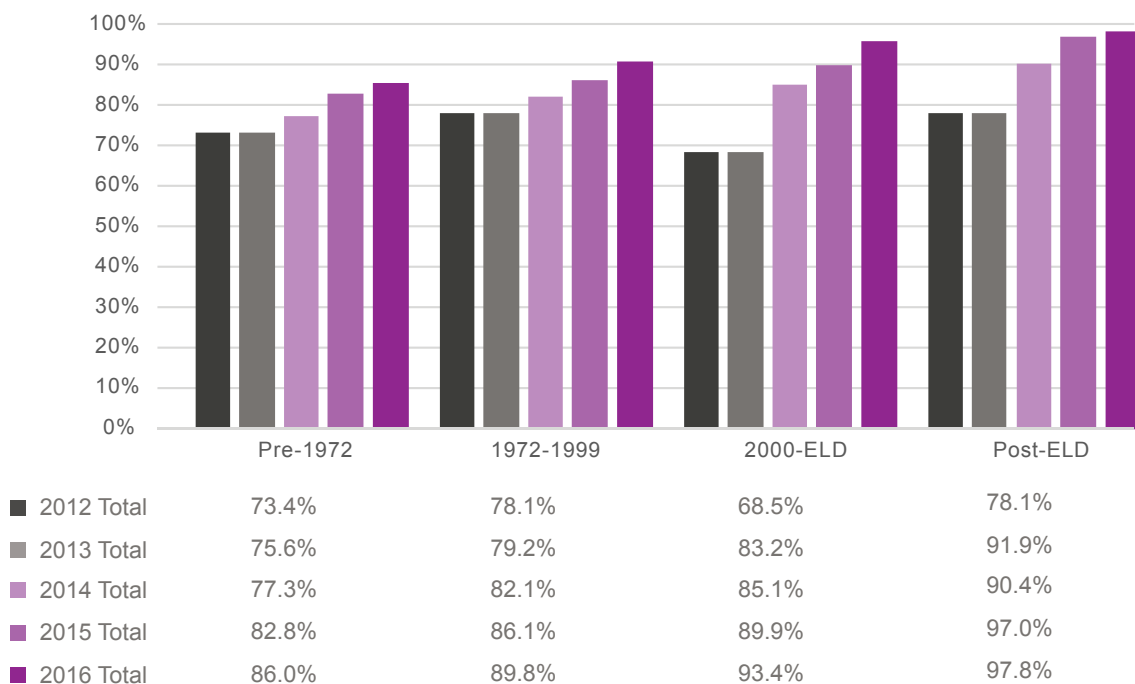


2) Note:- No data is available for the period January to April 2011

Exposure periods – improvement seen across all exposure periods

Overall search success rates continue to improve across all exposure periods. The post ELD success rate continues to improve reaching 97.8% in 2016.

Success rates



The top 10 employer locations as identified by claimant search enquiries on ELD

Number	Employer Location	Enquiries	Successful Traces	Success Rate	% of all clamant enqs
1	London	9,990	9,131	91%	6.2%
2	Birmingham	5,590	5,019	90%	3.5%
3	Manchester	3,859	3,457	90%	2.4%
4	Liverpool	3,157	2,804	89%	2.0%
5	Sheffield	3,076	2,796	91%	1.9%
6	Leeds	2,413	2,158	89%	1.5%
7	Nottingham	2,318	2,080	90%	1.4%
8	Leicester	2,271	2,045	90%	1.4%
9	Newcastle	1,838	1,685	92%	1.1%
10	Hull	1,396	1,247	89%	0.9%



Top 10 disease types as identified by claimant search enquiries on the ELD

Number	Disease	Enquiries	Successful Traces	Success Rate	% of all claimant enqs	% of all claimant disease enqs
1	Noise Induced Hearing Loss	96,779	85,361	88%	59.8%	83.7%
2	Mesothelioma	5,940	4,813	81%	3.7%	5.1%
3	Asbestosis	2,640	2,149	81%	1.6%	2.3%
4	Asbestosis Related Illness	1,673	1,408	84%	1.0%	1.4%
5	Pleural Plaques	1,585	1,246	79%	1.0%	1.4%
6	Pleural Thickening	1,419	1,132	80%	0.9%	1.2%
7	Asbestosis Related Cancer	1,021	875	86%	0.6%	0.9%
8	Other	753	669	89%	0.5%	0.7%
9	Repetitive Strain Injury(RSI)	742	723	97%	0.5%	0.6%
10	Vibration White Finger (VWF)	682	650	95%	0.4%	0.6%

Policy records held on the ELD

At the close of Q1 2017 the ELD contained 20.4 million policy records covering the equivalent of more than 30.9 million policy years of which 8.3 million are voluntary policy records representing nearly 19.3 million policy years.

Policy type



Policy records as defined by the necessary instruments issued by the FCA and relate to new or renewed EL policies post-implementation of the ELD (1 April 2011); and EL policies relating to claims traced/notified post-implementation of the ELD but relate to records with inception dates pre-ELD implementation.

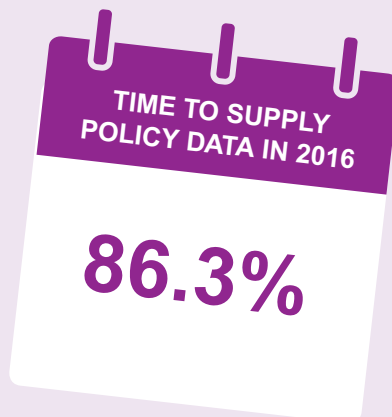
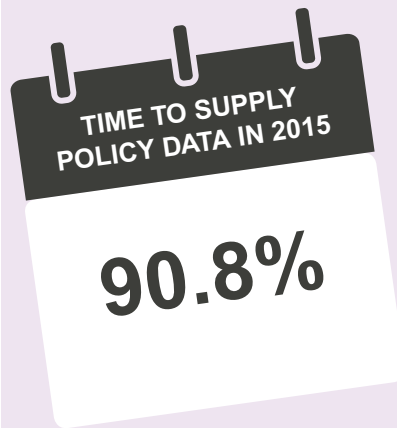


Policy records with an inception date prior to 1 April 2011 that an insurer has loaded for any reason other than the FCA Instrument

**TOTAL
COUNT 20.4m**

Time to supply policy records onto the ELD

% of records supplied within expected period ³



Registered users

In 2016 there were 5,666 registered users who had made at least one enquiry in the last two years.

2015

5,607
REGISTERED
USERS

2016

5,666
REGISTERED
USERS

3) The expected period to supply the data is 90 days

The Board

ELTO is an industry body with a robust and transparent governance structure. The ELTO Board has been in place since April 2010 and meets at least four times per year. The Board pays close attention to corporate risks, regulatory matters and key performance indicators.

The current directors are:



Stephen Lewis - Chairman
RSA



Ashley Boardman
Covea



Steven Browne
AXA Insurance UK Plc



Robert Donovan
Aviva Insurance Ltd



Anne Griffiths
Zurich Insurance Plc



Roland Jackson
Downlands Liability Management Limited



Richard Jeffs
National Federation of Builders



Matt Lacy
QBE European Operations



Shaun Randell
Brit Insurance Limited

ELTO has a contract with Tracing Services Limited (TSL) which manages the day-to-day service provision to ELTO customers. TSL takes direction from and reports to the Board. TSL has a contract with DXC Technology (formerly CSC) to manage the hosting of the ELD and with Sopra Group to manage the day-to-day technical support for the ELD.

Membership

ELTO's members are firms with EL policy liabilities for UK employers, both active and run-off insurers. Members subscribe to ELTO's Articles and Rules which compel them to submit data to ELTO in a specified format within specified timescales. Members are also obliged to comply with ELTO's Tracing Policy.

The proportion of EL insurers who opted to join ELTO as members remained extremely high, increasing from 169 at the end of 2015 to 178 at the end of 2016. This represents in excess of 99% of the current EL market. Non-members were approached to obtain their policy data as catered for by FCA regulations and where this has been obtained it has been loaded onto the ELD.

ELTO is funded through a levy on its membership which is based on an individual insurer's proportion of members' EL Gross Written Premium (GWP). All members are, on an annual basis, required to provide ELTO with their previous year's GWP.

All members whose GWP is above the de minimus level of £5 million are liable to pay a levy.

FCA tracing office audit

ELTO's service satisfied the FCA Tracing Office requirements during 2016. Please see the Independent Assurance Report on pages 17 to 18. ELTO remains committed to ensuring its services are delivered through a well-governed, robust framework.

FCA tracing regulations

ELTO has a formal tracing policy which reflects FCA tracing regulations and a full audit programme has been implemented to ensure the industry does all it can to fulfill its obligations.

Statement of comprehensive income of the year ended 31 December 2016	2016 £	2015 £
Turnover	2,115,096	1,991,274
Administrative expenses	(2,114,799)	(1,990,994)
Operating profits	297	280
Interest payable and similar charges	(297)	(280)
Profit of the year	-	-

Balance sheet as at 31 December 2016	2016		2015	
	£	£	£	£
Current assets				
Debtors	100,438		47,302	
Cash in hand	758,752		195,610	
	859,190		242,912	
Creditors:				
Amounts falling due within one year	(859,190)		(242,912)	
Net current liabilities		-		-
Net assets		-		-
Capital and reserves		-		-

The financial information set out above does not constitute the company's statutory accounts for the years ended 31 December 2015 or 2016, but is derived from those accounts. Statutory accounts for 2015 and 2016 have been delivered to the Registrar of Companies. The auditors have reported on those accounts: their reports were unqualified, did not draw attention to any matters by way of emphasis and did not contain statements under s498 (2) or (3) of the Companies Act 2006.

Summary financial statements

Directors' statement

These summarised financial statements do not constitute the full accounts but are a summary of the Statement of comprehensive income and Balance Sheet contained in the full accounts. The full accounts were approved by the Board on 20 June 2017 and were audited by Nexia Smith & Williamson who issued them with an unqualified audit opinion on them. The accounts have been filed at Companies House.

A copy of the full accounts can be obtained from:

Employers' Liability Tracing Office, Linford Wood House, 6 - 12 Capital Drive, Milton Keynes, MK14 6XT.



Steve Lewis
Chairman

Report by the Directors 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 2016.

In accordance with the requirements in ICOBS 8.4.9R (7)(a) of the Financial Conduct Authority ("FCA") Handbook effective as at 31 December 2016, the Board of Directors of the Employers' Liability Tracing Office ("ELTO") are able to confirm that for the year to 31 December 2016, 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 on 20 June 2017.



Steve Lewis
Chairman

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 2016.

1. In accordance with the terms of our letter of engagement dated 19 March 2013, 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 2016. 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 2016.
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 2016. 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 2016.
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 7(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.

Scope of assurance work

8. We conducted our reasonable assurance engagement in accordance with International Standard on Assurance Engagements 3000 – ‘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 2016. 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 2016.

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 2016;
- ▶ 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

11. 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 2016, 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.

Date 26 June 2017

Nexia Smith & Williamson
Chartered Accountants
Statutory Auditors
Cumberland House
15-17 Cumberland Place, Southampton
SO15 2BG

Glossary

Record Type

Compulsory

Policy records as defined by the necessary Instruments issued by the FCA and relate to new or renewed EL policies post implementation of the ELD (1 April 2011); and EL policies relating to claims traced/notified post-implementation of the ELD but relate to records with inception dates pre-ELD implementation.

Voluntary records

Policy records with an inception date prior to 1 April 2011 that an insurer has loaded for any reason other than the FCA Instrument.

Search Type

Simple Search

Enquiries are made on the database using the initial 'Simple Search' facility whereby the system searches the information input by the customer against the EL policies held on the database. The results are returned in real time.

Extended Search

If the customer is dissatisfied with the Simple Search results or the search fails to return any records, then the user can request an Extended Search. The enquiry is sent to all ELTO members to check against their policy records. A response is provided within 28 days and any subsequent positive results are then provided to the claimant.

Secondary Extended Search

A Secondary Extended Search is where the preceding Simple Search and Extended Search processes have led to an unsuccessful result but further investigations by an ELTO Tracing Investigator have identified new information. Consequently the enquiry is re-issued to members which will enable an insurer to find a positive match.

