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ELTO made further progress during the course of 2017, with improving success rates and further investment to ensure that the service is fit for purpose and able to meet its strategic objectives.

STRATEGIC OBJECTIVE 1

ELTO is the main easy route for claimants to trace an insurer.

ELD holds over 22 million records covering 33 million policy years

90% of disease enquiries get a successful response

98% of accident enquiries get a successful response

STRATEGIC OBJECTIVE 3

Increase the number of claimants receiving a response that allows them to pursue the right insurer.

Overall Search Success Improved to

92.3%

STRATEGIC OBJECTIVE 2

All claimant enquiries through the extended search service receive (when requested) a response in line with the FCA requirements.

151,763

successful enquiries

STRATEGIC OBJECTIVE 4

ELTO is run efficiently for the industry and its policyholders.

ELTO is the only regulated tracing office in the UK.

Net customer satisfaction score of

Net member satisfaction score of 75.1%

57.1%





Chair's statement

ELTO was set up in 2011 to help claimants identify their employer's insurer. Six years on, the claimant remains at the forefront of what ELTO is about – helping to connect them with an insurer in their moment of need.



In my first address as ELTO's Chair, I would like to first express my thanks to our outgoing Chair, Stephen Lewis, who has ably led and driven ELTO forward over the last few years. As I take over the post of Chair from Stephen, I am pleased to say that ELTO has never been in better shape.

I have been involved in ELTO from the very initial idea to create it, have helped to bring it to life and have been a Director on the Board for the last eight years. In that time, I have seen ELTO transform the way claimants find their Employer's insurer to enable them to pursue a claim. ELTO now sees c.164,000 enquiries a year, far more than we ever imagined back in 2009. Yet at the same time in 2017 success rates hit a new high of 92.3%.

We should also note that the volume of records on the database is now over 22 million, covering 33 million policy years. This clearly shows the insurance industry's commitment to ensuring as much data is available as possible in order to connect a claimant with a potential insurer. These records also span a significant period of history and the industry is now achieving high success rates across all periods of time as evidenced on page 8 of this report.

As we move forward ELTO wants to ensure that even more records are identified easily and accurately, which is why we have pushed forward in collaboration with the Her Majesty's Revenue and Customs (HMRC) to try to gain access to their Employer Reference Number (ERN) data. Pleasingly we have worked with them to perform a pilot exercise to match their data against the data on the ELD and this work will continue in 2018. Ultimately if we can populate more records on the Employers' Liability Database (ELD) with an ERN it will enable a potential claimant to identify individual records on the database more quickly and accurately and hopefully improve their experience of using the service.

ELTO will continue to work tirelessly to serve those customers on behalf of the industry, whilst also continuing to undertake the key role of helping its Members comply with their regulatory obligations. In this regard, ELTO remains as the only regulated employers' liability tracing office in the UK.

I look forward to helping ELTO in my role as Chair in the year ahead.

S. De

Steve Browne, Chair



Operational statement

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

The key aim in 2017 remained ensuring quick and easy access to the ELD with efforts focused on maintaining the stability and security of the service alongside other smaller functional changes to help improve the customer journey.

The programme of work agreed was to support the following operational activities:

- ▶ ELD system development, security and stability
- Supporting Members' compliance with existing and new regulatory requirements
- Continuing to listen to our user community and making improvements to the tracing service.

ELD system development and security

During 2017 enhancements were made to the system to introduce an annual review of registration access rights for Users to ensure only appropriately authorised organisations continue to access the system.

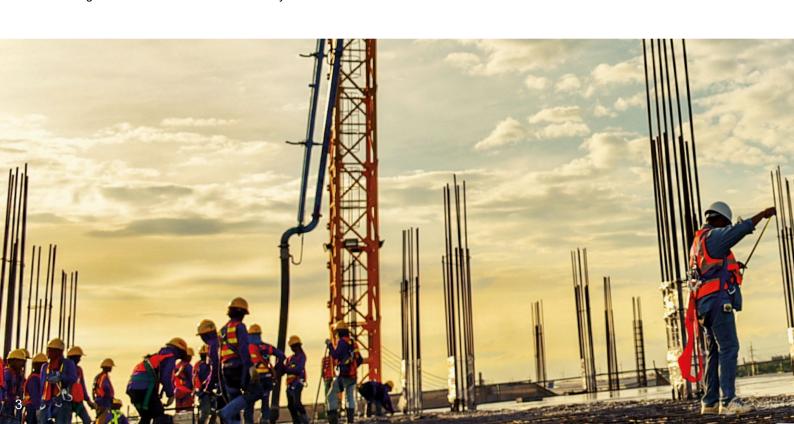
The system was also updated to allow ELTO Members to display more than one set of claims contacts details. This change was made to ensure that the Users of the system go to the right claims contact straight away, which should improve their User journey.

General Data Protection Regulation (GDPR)

In relation to GDPR, the ELTO end to end service offering, processes and procedures have been reviewed and catalogued during 2017. Work continues to adhere to the deadlines set by the Information Commissioner's Office (ICO) to implement the changes identified in 2018, as part of the new data protection act (GDPR). A Data Protection Officer has been appointed and legal guidance sought in relation to consent and the processing of data.

Benefits:

- Ensuring the ELD is accessed appropriately
- Improving the customer journey.



Operational statement

Support Members with Financial Conduct Authority (FCA) requirements

HMRC Dialogue

Significant progress has been made with HMRC during the course of 2017. Notably, in May 2017, the Digital Economy Bill was passed which gives ELTO the legal gateway to access HMRC data for the purposes of gathering employer reference numbers (ERN).

Following the implementation of the Bill, further work was undertaken with HMRC to conduct a pilot exercise. A sample of 1 million records from the ELD was sent to HMRC and they tried to match them to ERN's in HMRC systems. The initial results suggest that we can significantly improve upon the industry's ERN compliance results, which at the end of 2017 was 51.5%.

The work with HMRC is a major step forward and one which has taken a long time to achieve but it is important that ELTO now continue to work with HMRC and the Financial Conduct Authority (FCA) to see whether a long term solution can be implemented.

Benefits

- Improved claimant journey
- Satisfying Members' obligation to collect ERN's.

Time to supply

Time to supply for 2017 has dropped to 81.9%. This is a 4.4% decrease from 2016. This is an important regulatory measure and one which the industry is striving to achieve however it should be recognised that, whilst time to supply has dropped, the completeness of the ELD has improved as in the majority of cases, time to supply has been impacted by Members adding data that was not previously on the database. The ELTO Board feel it is increasingly important to ensure that the ELD is as complete as possible and are working with Members to ensure this happens through the ELTO upload policy, due for launch in 2018, which is focused towards eliminating the risk of legacy industry knowledge being lost.

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

User survey

Both the Customer and Member survey results highlighted a common theme: the importance for Users to access and navigate the whole range of services provided by ELTO; whilst ensuring the experience is fast, accurate and effective.



Operational statement

Members

The feedback received from the survey highlighted that overall the satisfaction level with the service is good, with a very satisfied score of 93.8%; an increase of 22.3% on the previous year. The net satisfaction score also saw an increase of 6.5% to 75.1% in 2017.

Whilst the survey identified positive feedback, ELTO recognises the importance of providing a consistent service throughout the year and will continue to identify ways to enhance the customer service overall.

Registered Users results

The 2017 survey was sent to 1,468 individual e-mail addresses during October 2017. A total of 229 responses were received, giving a slightly higher response rate of 16% compared to a response rate of 15% for 2016. The net satisfaction score saw a decrease of 6.7% to 54.5% in 2017.

The key themes that emerged in the survey results once again reflected that Users wanted improvements to the extended search function and more onscreen help.

We are examining ways to improve the customer journey during 2018. This will involve reviewing key touch points, identifying improvements and implementing the solutions after they have been tested by a group representing Users.

These reviews, once complete, will provide us with significant insights into how we can continue to improve the ELTO searches and support functions provided by the ELD and ELTO website.

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 third cycle was completed in the first quarter of 2018 with a KPI of 70.4%, increased from a KPI of 66.5% in the second cycle. The fourth cycle of tracing audits for 109 Members is now underway and is on course for completion early in 2019.

The tracing audits focus on two main areas – the identification of available records and the quality of the tracing process – with agreed recommendations followed up by the ELTO Audit Team to ensure implementation, and enable visibility of progress to be 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 2018, ELTO is providing these services to those Members that have requested it do so. In 2017, these services were provided to 22 Members.

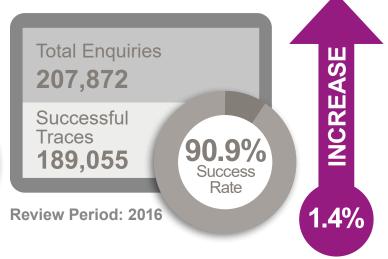
Financial Overview

The ELTO budget for 2017 was set with the base figure of £2,287k. This reflected an increase of 8% on the 2016 levy but was the first significant increase since 2013. The main contributor to the increase was increased expenditure to further enhance the robustness of the systems security.

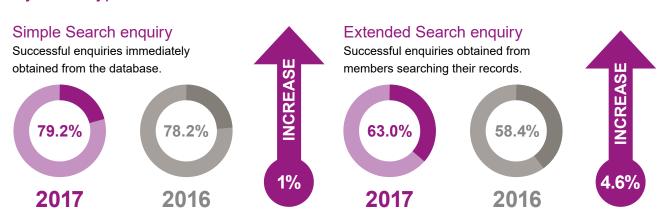
ELTO - the year in numbers

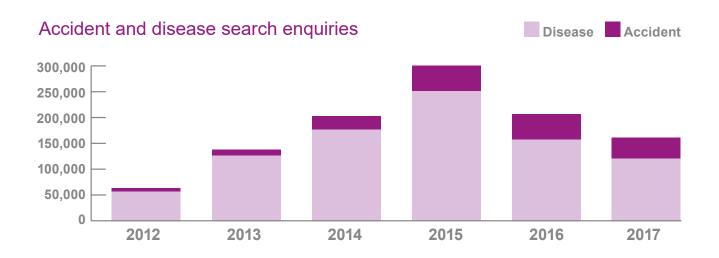
Overall search enquiry success rate





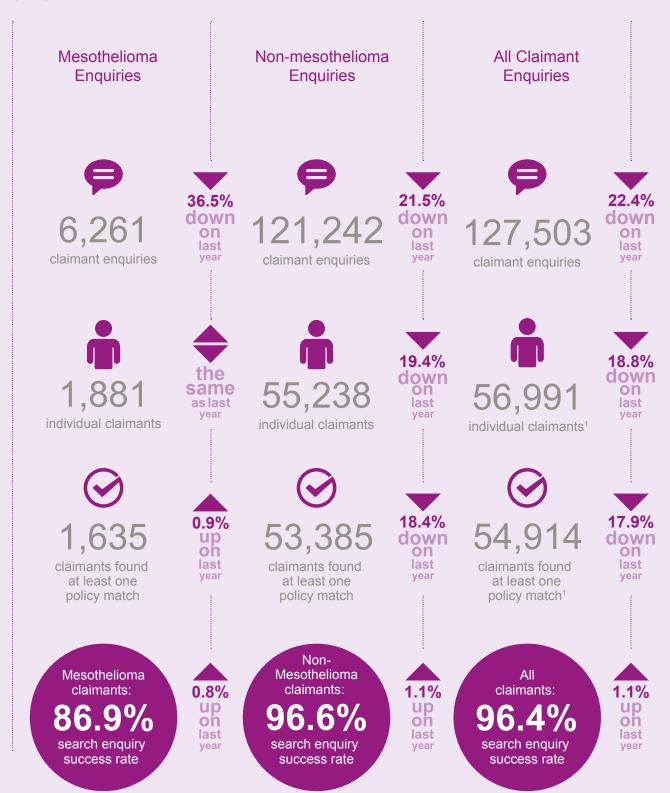
By result type





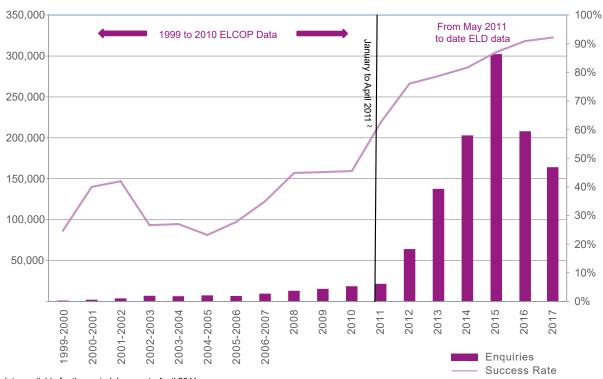
Claimant search enquiry success rate

The overall volume of enquiries through the service continued to fall through 2017, however, this drop was mainly seen in the non-mesothelioma enquiries the service sees and is due to a reduction in the number of Noise Induced Hearing Loss (NIHL) enquiries.



ELCOP/ELTO enquiries and success rate trends

ELTO replaced the previous voluntary Employers' Liability Code of Practice (ELCOP) tracing service.



No data available for the period January to April 2011

Exposure periods - improvement seen across all exposure periods

Overall search success rates across all the exposure periods are now beginning to level out however they continue to be above 90% for all post 1972 exposure periods.



ELTO - the year in numbers

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	7,831	7,261	93%	6.1%
2	Birmingham	4,356	4,040	93%	3.4%
3	Manchester	3,123	2,870	92%	2.4%
4	Liverpool	2,486	2,261	91%	1.9%
5	Sheffield	2,315	2,162	93%	1.8%
6	Leeds	2,231	2,053	92%	1.7%
7	Nottingham	1,593	1,462	92%	1.2%
8	Leicester	1,507	1,373	91%	1.2%
9	Newcastle	1,336	1,239	93%	1.0%
10	Doncaster	1,287	1,205	94%	1.0%



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

Number	Disease	Enquiries	Successful Traces	Success Rate	% of all claimant enquiries*
1	Noise Induced Hearing Loss	66,036	59,387	90%	51.8%
2	Mesothelioma	6,261	5,208	83%	4.9%
3	Asbestosis	2,984	2,471	83%	2.3%
4	Pleural Thickening	1,764	1,478	84%	1.4%
5	Pleural Plaques	1,443	1,150	80%	1.1%
6	Asbestosis Related Illness	1,280	1,138	89%	1.0%
7	Abestosis Related Cancer	919	755	82%	0.7%
8	Repetitive Strain Injury(RSI)	790	777	98%	0.6%
9	Hand Arm Vibration Syndrome (HAVS)	609	593	97%	0.5%
10	Vibration White Finger (VWF)	600	581	97%	0.5%

^{*} Based on total claimant enquiries of 127,503



Policy records held on the ELD

At the close of Q1 2018 the ELD contained 22.3 million policy records covering the equivalent of more than 33.2 million policy years of which 8.5 million are voluntary policy records representing nearly 19.9 million policy years.



Time to supply policy records onto the ELD

% of records supplied within expected period *

TIME TO SUPPLY POLICY DATA IN 2016

86.3%

TIME TO SUPPLY POLICY DATA IN 2017

81.9%



Policy type

COMPULSORY COUNT

13.8m

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.



8.5_m

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 22.3m



Registered users

In 2017 there were 5,491 registered users who had made at least one enquiry in the last two years.

2016



5,666

REGISTERED USERS

2017



5,491

REGISTERED USERS

3.1% DOWN ON LAST YEAR

^{*} The expected period to supply the data is 90 days

Corporate governance

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 -Chair RSA (Previous Chair until January 2018)



Ashley Boardman Covea



Steven
Browne
AXA Insurance
UK Plc
(Chair from
March 2018)



Bob Donovan Aviva Insurance Ltd



Anne Griffiths Zurich Insurance Plc



Roland Jackson Catalina Worthing Insurance 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 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 number of EL insurers who opted to join ELTO as Members remained extremely high, increasing from 178 at the end of 2016 to 182 Members at the end of 2017. 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.

Corporate governance

FCA tracing office audit

ELTO's service satisfied the FCA Tracing Office requirements during 2017. Please see the Independent Assurance Report on pages 16 to 17. 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.

Summary financial statements

Statement of comprehensive income of the year ended 31 December 2017

	2017 £	2016 £
Turnover	2,250,523	2,115,096
Administrative expenses	(2,250,228)	(2,114,799)
Operating profits	294	297
Interest payable and similar charges	(294)	(297)
Profit of the year	-	-

Balance sheet as at 31 December 2017

	2017		2016	
	£	£	£	£
Current assets				
Debtors	495,406		100,438	
Cash in hand	137,173		758,752	
	632,579		859,190	
Creditors:				
Amounts falling due within one year	(632,579)		(859,190)	
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 2016 or 2017, but is derived from those accounts. Statutory accounts for 2016 and 2017 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 19 June 2018 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 Browne, Chair

Director's FCA compliance statement

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 2017.

In accordance with the requirements in ICOBS 8.4.9R (7)(a) of the Financial Conduct Authority ("FCA") Handbook effective as at 31 December 2017, the Board of Directors of the Employers' Liability Tracing Office ("ELTO") are able to confirm that for the year to 31 December 2017, 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 19 June 2018.

Steve Browne, Chair

Independent assurance report

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 2017.

- 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 2017.
- 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 2017. 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 2017.
- 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.

Independent assurance report

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 2017. 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 2017.

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 2017;
- ▶ 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 2017, 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.

19 June 2018

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

Compulsory record 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.

ELTO is a not-for-profit organisation set up to provide claimants and their representatives with quick and easy access to a central database of Employers' Liability (EL) policies through an online enquiry facility that helps them to find their employer's EL insurer. ELTO has replaced the previous voluntary Employers' Liability Code of Practice (ELCOP) tracing service, which was in place since 1999 and helped thousands of claimants trace the EL insurer to pursue a claim.

Employers' Liability Database (ELD)

The ELD launched in April 2011 and contains all new and renewed Employers' Liability (EL) insurance policies; policies from before April 2011 which have new claims made against them and policies that have been and will continue to be identified through the Employers' Liability Tracing Office (ELTO) tracing service.

ERN

The Employer Reference Number (ERN) is also known as the Employer PAYE reference. From 1 April 2012, the capture of the ERN and all subsidiary company names and their ERN's if applicable became mandatory for Insurers to provide on new and renewed records. The ELD's ability to provide enquirers with successful trace results is supported by establishing a unique identifier for employers. ELTO has adopted the ERN as the most effective unique identifier available.

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.

FCA or Financial Conduct Authority is the regulator for financial services firms and financial markets in the UK

GDPR or General Data Protection Regulation https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/

HMRC

Her Majesty's Revenue and Customs - tax office

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.

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.

Voluntary record type

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

