

MID Overview Document

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Background

All companies wishing to underwrite motor insurance within the UK are required by law to be a member of the MIB and to contribute to the fund. This is by means of a levy which is in proportion to the size of the motor insurance business that it operates. All MIB Member companies are also required to provide policy details to the Motor Insurance Database (MID).

The MID was launched in September 2001 to tackle the growing problem of uninsured driving within the UK. It provides a national database of all vehicles that have **insurance cover**. Thus it can quickly be determined if a vehicle 'is insured' or not.

On 20 January 2003 the Fourth European Directive in relation to motor insurance came into force. Briefly this required all member states within the EU to provide an information centre for individuals involved in accidents in another member country. This would identify who insured the vehicle that was involved in an accident within the country. The MID has proved a valuable tool in fulfilling this requirement.

The MIB are data controllers of MID and the database is hosted on our behalf by Experian.

Targets

Whilst an insurer's underwriting database contains many details relating to the policy and the cover, some of this information is not required by the MID, also the output file/s of the system and the integration into MID must be in a standard format. This requires considerable effort and testing to be ensure the supply of data is both timely and accurate.

In order to ensure that the data on the MID complies with these requirements, Department for Transport targets have been set that must be adhered to. Currently the Time to Supply (TTS) targets covers three categories;

MID 1

This relates to an individual insuring a private vehicle. It typically includes a policyholder who owns one vehicle but can include up to five on a policy.

TARGET: 95% of all data must be on MID within 7 Days of the effective date of the record submitted.

MID 2 Policies

Where an insurer issues a policy relating to fleet, commercial or motor trade

TARGET: 95% of all data must be on MID within 14 days of the effective date of the record submitted.

MID 2 Vehicles

The specific details relating to the vehicles on cover via the fleet, commercial or motor trade policy must be uploaded within twenty-one days. This also applies to the changes made to the vehicles on cover during the life of the policy i.e. taking a vehicle off cover.

TARGET: 95% of all data must be on MID within 21 days of the effective date of the record submitted.

Self-Regulation Rules Guidance

The targets set for MID1 and MID2 Vehicles are subject to sanctions for non-compliance. These are outlined in the Articles of Association to the MIB. A Memorandum detailing these (called MIB Data Quality Self-Regulation Sanction Rules) is included in Appendix A.

Within these Articles of Association is Article 76 which details the need for data quality and timeliness in relation to the MID. We have included this in Appendix B (called Data Quality Self-Regulation - Interpretation of Article 76).

For convenience we have summarised these two articles as below;

Summary of 'MIB Data Quality Self-Regulation Sanction Rules'

Compliance review dates are 31 March, 31 July and 30 November for the purposes of assessing performance against the MID1 TTS target and the MID2 policy TTS target.

If the Market is non-compliant, all members non-compliant with the 7 days target will be subject to sanctions.

If the Market is compliant, any non-compliant member as at the review dates must demonstrate they are achieving 14 day TTS compliance at either the rolling three month performance immediately preceding the review date, or in the single month immediately preceding the review date. The member must **also** have maintained or improved their performance against the 7 days TTS from that recorded at the previous review date. The 7-day compliance target is effective from 1 January 2008. As the first review date after this date is 31 March 2008 the first 7 day TTS performance will be compared with that on 31 December 2007 to determine whether performance has been maintained or improved.

For MID2 policies each individual member in their own right must demonstrate they are achieving the 14-day TTS compliance target at either the rolling three-month performance immediately preceding the review date, or in the single month immediately preceding the review date in order to avoid sanctions being applied.

Rule 3 (b) of The Data Quality Self-Regulation Sanction Rules provides a non-exhaustive outline as to some of the typical steps and measures to be taken in the event a member is determined, by the MIB Board, to be failing in its TTS obligations

Rule 4 (c) of the Data Quality Self-Regulation Sanction Rules details the sanction applicable for failing to achieve TTS targets. The sanction applicable will be a minimum of £2,000 to a maximum of £500,000, depending upon the level of non-compliance against **each** TTS target the member has failed to achieve.

The Appeals process is as follows: the MIB will notify in writing each and every member against whom sanctions are applicable, as soon as possible after the review date.

Each member has 21 calendar days from receipt of the written notification to appeal in writing to the MIB, including the grounds for appeal.

The MIB will consider any grounds for appeal and respond to the member within 21 calendar days of receiving the written notice of appeal of their decision. MIB's decision is final and binding.

Each member has 21 calendar days in which to pay any fine unless they wish to appeal. Any member, whose fine is upheld following an appeal, has 7 calendar days in which to pay.

Article 76 (4) provides for members' rights to appeal to the English Courts any decision of the bureau regarding cessation of membership.

Automatic cessation of MIB membership is replaced with the ability to determine if membership should cease for breach of the Overriding Principle of Data Quality Requirements (Interpretation of Article 76 (2)) after prior consultation with the Financial Services Authority.

Rule 4 (f) of the Data Quality Self-Regulation Sanction Rules ensures the imposition of fines for not complying with the TTS targets will not apply to any Member on a review date if membership of that Member has existed for less than six months.

Summary of 'Data Quality Self-Regulation - Interpretation of Article 76'

<p>The governing documents are the Data Quality Self-Regulation (Interpretation of Article 76) and The Motor Insurers' Bureau Data Quality Self-Regulation Sanction Rules.</p>
<p>Article 76 contains an Overriding Principle requiring each member to use its best endeavours to comply with the data quality requirements at all times and breaches of the overriding principle may result ultimately in cessation of membership.</p> <p>Breaches of more specific MID1 &/or MID2 time to supply rules can result in the imposition of financial penalties under the Sanction Rules.</p>
<p>MID1 Compliance Time To Supply (TTS) target (effective from 1 January 2008) is 95% of all records submitted to the MID within 7 days.</p> <p>SANCTIONS WILL BE APPLIED FROM 1 JAN 2008 FOR FAILURE TO COMPLY WITH THE ABOVE TARGET</p>
<p>MID2 Policy Compliance Time To Supply (TTS) target is 95% of all records submitted to the MID within 14 days.</p> <p>SANCTIONS WILL BE APPLIED FROM 1 JAN 2008 FOR FAILURE TO COMPLY WITH THE ABOVE TARGET.</p>
<p>MID2 Vehicle Compliance Time to Supply (TTS) target is 95% of all records submitted to the MID within 21 days.</p> <p>NO SANCTIONS CURRENTLY APPLY TO THIS COMPLIANCE TARGET</p>

Who Uses The Data?

MIB members and their authorised claims handling agents and solicitors as part of the claims process when an accident has occurred. This will confirm if the vehicle had insurance on the day of the accident and show the claimant or their representative who to direct the claim to.

However the police are the 'front line' as they access the MID on the roadside when a vehicle is stopped by an officer and are currently the largest user of the MID with over 2 million 'checks' per month. The use of MID as an enforcement tool by the Police is evident in that since 2005 more than 1,421,000 uninsured vehicles have been seized for no insurance.

Figures correct as of end of 2015

The DVLA is provided with an extract of MID data for use in Continuous Insurance Enforcement (CIE)

Frequently Asked Questions

Before being able to write motor insurance business a number of questions need to be addressed;

Who will be responsible within the organisation for compliance with the requirements of MID?

Within the insurer's organisation a MID Sponsor will need to be appointed. This is a high-level responsibility for driving the company to achieve compliance and to ensure this is maintained. A team can be appointed below this level to deal with the day-to-day supply of data and any problems that arise. However the Sponsor remains the final decision maker.

Can another organisation provide the data for an insurer?

Yes. A Delegated Authority may be authorised to submit data on behalf of an insurer. There is an authorisation process to set-up the necessary MID profile to ensure all data protection and input criteria are adhered to. However please note that the responsibility for providing the data on time and accurately rests with the underwriting insurer.

What data needs to be provided?

Not all of the data that the underwriter may have in the system needs to be uploaded (for example the MID does not need details such as any no claims discount or a change in premium or policy excess). Therefore unnecessary amendments are not required.

An insurer will be provided with a detailed 'Functional Specification' for both MID1 and MID2 as to what data is needed and the field limits for the data. A copy of this Functional Specification will be provided to an insurer once it has joined the MIB as a member. A password will also be provided to the secure area of the MIB website which contains the relevant technical documentation.

What is the process for testing prior to going live?

Following full MIB membership, initial access is provided via a secure submission method to a test environment. This ensures that all types of policy details and amends (for example inception, deletion, lapse, cancellation and renewal) are all tested prior to going live. Once a thorough and satisfactory testing of all end-to-end systems has taken place, authorisation to enable access to the live database will be made by your MIB Account Manager. This confirms that an insurer or delegated authority is able to upload data to the MID and can commence underwriting motor business in the UK.



Is help available for queries/problems?

Experian have various levels of customer support depending on the type of enquiry made. The Experian MID team can be contacted on 0870 903 3043 (Option 2) or via Cust.Support@uk.experian.com.

Each underwriting insurer will also have a dedicated MID Account Manager within the MIB. They can assist with understanding and applying the rules around supplying MID data in a timely and accurate manner. Each Member will be provided with monthly reports to reflect performance and to highlight any issues surrounding compliance.

Appendix A - The MIB Data Quality Self-Regulation Sanction Rules

THE MOTOR INSURERS' BUREAU
DATA QUALITY SELF-REGULATION SANCTION RULES
(As adopted by a special resolution dated
24 July 2007)

1. Memorandum and Articles of Association

These Rules are to be read in conjunction with the Memorandum and Articles of Association (“the Articles”) of The Motor Insurers’ Bureau. In the event of any inconsistency between these Rules and any other document as between the Members (as defined below), the provisions of these Rules shall apply except where expressly stated otherwise for the period of any such inconsistency and in the event of any conflict between these Rules and the Articles the Members shall procure and vote in favour at the request of the Board (as defined below) such modification to the Articles as shall be necessary to cure such conflict.

2. Interpretation of the Rules

For the purposes of these Rules:

- (a) “Board” means the Board of the Bureau
- (b) “Bureau” means the Motor Insurers’ Bureau
- (c) “Data Quality Requirements” means the requirements for data on the MID (including but not limited to Mandatory Policy Data) to be complete and accurate and compliant with:-
 - (i) TTS Targets;
 - (ii) The Regulations
 - (iii) the requirements from time to time stipulated by the Department for Transport or any other governmental body who delegates its authority to the Bureau to operate the MID; and
 - (iv) any other guidelines, targets or criteria the Bureau may reasonably stipulate from time to time after prior consultation with the Department for Transport and/or the Financial Services Authority or other appropriate regulator
 - (v) any relevant terms contained in any Members’ Participating Insurers Agreement
- (d) “Insured Motor Vehicle” means any motor vehicle insured by a Member
- (e) “Mandatory Policy Data” means in respect of each Insured Motor Vehicle the information required or to be provided by each Member pursuant to: -
 - (i) the Regulations; or

- (ii) the functional specification provided to all Members by the Bureau from time to time.
- (f) “Member” means a member of the Bureau.
- (g) “MID” means the Motor Insurance Database maintained by the Bureau.
- (h) “MID 1” means that part of the MID which relates to Insured Motor Vehicles or policies concerning Insured Motor Vehicles which are insured on an individual basis.
- (i) “MID 2” means that part of the MID which relates to Insured Motor Vehicles or policies concerning Insured Motor Vehicles which are not related to MID 1, in particular those generally referred to as “Fleet and/or motor trade”.
- (j) “The Regulations” means The Motor Vehicles (Compulsory Insurance) (Information Centre and Compensation Body) Regulations 2003.
- (k) “Review Dates” means in each calendar year 31 March, 31 July and 30 November.
- (l) “TTS Targets” means timelines to supply Mandatory Policy Data set by the Bureau after agreement with the Department for Transport from time to time which, at the date of adoption of these Rules, are as follows:-
 - (i) for MID 1 up to 31 December 2007 all Mandatory Policy Data is to be on the MID within 14 days of any relevant change;
 - (ii) for MID 1 from 1 January 2008 all Mandatory Policy Data is to be on the MID within 7 days of any relevant change;
 - (iii) for MID 2 all Mandatory Policy Data concerning policies is to be on the MID within 14 days of any relevant change; and
 - (iv) for MID 2 all Mandatory Policy Data concerning an Insured Motor Vehicle is to be on the MID within 21 days of any relevant change.

3. Compliance with Overriding Principles of Data Quality Compliance

- (a) If the Board determines any Member fails to comply with Article 76 (2) of the Articles in respect of the Data Quality Requirements (“DQR Failure”) the provisions of this Rule 3 shall apply.
- (b) If following any determination by the Board that there has been a DQR Failure by any Member, the Bureau shall notify such Member (“the Defaulting Member”) in writing of the DQR Failure and the criteria and measurements the Board, on behalf of the Bureau, applied to determine such DQR Failure and stipulate the procedure the Bureau requires such Defaulting Member to implement to attempt to cease or reduce such DQR Failure which may include but not be limited to:-
 - (i) what remedial steps must be taken by the Defaulting Member to remedy the DQR Failure;
 - (ii) what forum, procedures and methods of review the Bureau will wish to implement to discuss, assess and measure the Defaulting Member’s DQR failure (including representations by the Defaulting Member on its views on whether or not there has been a DQR Failure) and the process for reviewing and measuring the Defaulting Member’s rectification or reductions of the DQR failure;

- (iii) the timescales and action plans to be taken by a Defaulting Member and/or the Bureau to implement the matters set out in Rules 3 (b) (i) and (ii); and
 - (iv) supporting documentation required by the Bureau from a Defaulting Member to measure and demonstrate rectification of or reductions in any DQR Failure.
- (c) Any deadline or criteria set by the Board for rectification or reduction in any DQR Failure may be a series of deadlines or criteria or a specific deadline or criteria as the Board may reasonably determine depending on the Board's view of the extent and degree of the DQR Failure by the Defaulting Member.
- (d) Without prejudice to the Bureau's ability to raise additional levies under Rules 4 and 5 below if the Board having set prescribed deadlines and criteria for a Member to rectify or reduce any DQR Failure the Bureau determines that the Defaulting Member has not achieved sufficient improvements in meeting Data Quality Requirements having carried out the processes set out in Rules 3 (b) and (c) the Bureau may after prior consultation with the Financial Services Authority determine that such Defaulting Member shall cease to be a Member of the Bureau in which case the provisions of Article 11 of the Articles (subject to Article 76 (4) of the Articles) shall apply.

4. MID Compliance

- (a) As separate and additional obligations to the obligation set out in Rule 3 each Member shall at all times from:-
 - (i) the date of adoption of these Rules to 31 December 2007 ensure all Mandatory Policy Data relating to 95% of all Insured Motor Vehicles to which MID 1 relates will be fully and properly on the MID within 14 days of any relevant change;
 - (ii) 1 January 2008 ensure all Mandatory Policy Data relating to 95% of all Insured Motor Vehicles to which MID 1 relates will be fully and properly on the MID within 7 days of any relevant change; and
 - (iii) 1 January 2008 ensure all Mandatory Policy Data relating to 95% of all policies for MID 2 shall be on the MID within 14 days of any relevant change.
- (b) The Bureau shall on the Review Dates assess and determine whether each and every Member has complied with the TTS Targets and in particular, but not limited to, those obligations set out in Rule 4 (a) by reference to the Bureau assessing the Member's compliance with the TTS Targets referred to in Rule 4 (a) over the three months immediately preceding the relevant Review Date as a rolling 3 month figure or in the month immediately preceding the relevant Review Date in isolation.
- (c) If following any Review Date any Member has failed to comply with its obligations concerning the TTS Targets set out in Rule 4 (a) by reference to both of the measurements and assessments made by the Bureau under Rule 4 (b) above any such

Member shall pay a levy (in addition to any levy payable under Article 15 of the Articles) which shall be:

- (i) 0.2% of such Member's then last annual levy payment made under Article 15 attributable in the case of any failure to meet TTS Targets set out in 4 (a) (i) and (ii) levy premiums for MID 1 business in that year as specified in Rule 5 (e) (i) and in the case of any failure to meet TTS Targets set out in 4 (a) (iii) levy premiums attributed to MID 2 business in that year as specified in Rule 5 (e) (ii) (in each case the "Relevant Previous Year Levy"); plus
- (ii) an additional sum being a percentage of 1.8% of such Member's Relevant Previous Year Levy set out below by reference to every one percent or part thereof by which the number as a percentage of Insured Motor Vehicles or policies that are on the MID for the relevant period on the Review Date is less than 95% of the total number of Insured Motor Vehicles or policies that should have been fully and properly on the MID for the relevant period on the Review Date in relation to that Member.

1.8% of Relevant Previous Year Levy	TTS Targets Shortfall below 95%	Additional levy under Rule 4(c) (ii) as a percentage of the Relevant Previous Year Levy
10%	94.0+	0.18%
11%	93.0+	0.198%
12%	92.0+	0.216%
13%	91.0+	0.234%
15%	90.0+	0.27%
17%	89.0+	0.306%
19%	88.0+	0.342%
21%	87.0+	0.378%

1.8% of Relevant Previous Year Levy	TTS Targets Shortfall below 95%	Additional levy under Rule 4(c) (ii) as a percentage of the Relevant Previous Year Levy
23%	86.0+	0.414%
25%	85.0+	0.45%
30%	84.0+	0.54%
35%	83.0+	0.63%
40%	82.0+	0.72%
45%	81.0+	0.81%
50%	80.0+	0.9%
60%	79.0+	1.08%
70%	78.0+	1.26%
80%	77.0+	1.44%
90%	76.0+	1.62%
100%	<76.0%	1.8%

- (d) No additional levy on any one occurrence under Rule 4 (c) shall be less than £2,000 or exceed £500,000 and in the event that such additional levy would have been less than £2,000 but for this Rule 4 (d) the Member to which such additional levy applies shall pay £2,000 and in the event such additional levy would then exceed £500,000 but for this Rule 4 (d) the Member to which such additional levy applies shall only pay an additional levy of £500,000.
- (e) The provisions of Rule 4 (c) shall not apply to any Member on a particular Review Date in respect of a Member's non-compliance with Rules 4 (a) (i) and (ii) if:
 - (i) on that Review Date Mandatory Policy Data or relevant changes thereto relating to 95% of all Insured Motor Vehicles of all Members to which MID 1 relates were fully and properly on the MID over the three months immediately preceding the relevant Review Date as a 3 month rolling figure or in the month immediately preceding the relevant Review Date in isolation; and
 - (ii) that Member:
 - (aa) from the date of adoption of these Rules that Member has always achieved MID 1 TTS Targets of not less than those set out in Rule 4 (a) (i) being 95% of all Insured Motor Vehicles to which MID 1 relates will be fully and properly on the MID within 14 days of a relevant change timelines ; and
 - (bb) has consistently maintained and improved to the reasonable satisfaction of the Bureau its performance against TTS Targets set out in Rule 4 (a) (ii) from 1 January 2008 since its previous measurement against those TTS Targets under Rule 4 (a)
- (f) The provisions of Rule 4 (c) shall not apply to any Member on a particular Review Date if it would apply but for the fact any Member has only been a Member of the Bureau for a period less than six months on any Review Date.

5. Appeals and Payment of Additional Levies

(1)

- (a) The Bureau will notify in writing any and each Member to whom an additional levy under Rule 4 (c) is payable by as soon as is reasonably practicable under Rule 4 (b).
- (b) Any Member who is required to pay an additional levy under Rule 4 shall have 21 calendar days from receipt of the notice set out in Rule 5 (1) (a) to appeal in writing against the payment of such additional levy (or the amount of such levy) by notice in writing to the Bureau including providing the written grounds for its appeal
- (c) The Bureau shall consider any written appeal and the Member's grounds for such appeal under Rule 5 (1) (b) acting in good faith and the Bureau shall notify such Member in writing within 21 calendar days of receipt of the Member's written appeal and grounds for appeal of its decision which shall be final and binding.
- (d) Any additional levy payable by a Member pursuant to Rule 4 (c) shall be payable within 21 calendar days of the Bureau's notice to that Member that the additional

levy is due unless such Member has appealed under Rule 5 (1) (b) against such additional levy or the amount of the additional levy in which case if the Bureau's finding on appeal pursuant to Rule 5 (1) (c) is that such levy is still payable or part thereof is still payable then the Member shall pay such additional levy within 7 calendar days of receipt of the Bureau's decision in writing under Rule 5 (1) (c).

- (e) For the purpose of these Rules:
 - (i) MID 1 leviable premiums are the leviable premiums for the following classes of business:
 - Private Car Comprehensive;
 - Private Car Non-Comprehensive; and
 - Motor Cycles
 - (ii) MID 2 leviable premiums are the leviable premiums for the following classes of business:
 - Commercial;
 - Fleet; and Other
- (2) Any appeals in respect of any cessation of membership of the Bureau of any Member shall be carried out pursuant to Article 76 (4) of the Articles.

6. Notice

- (a) Any notice required to be given under these Rules, shall be in writing and shall be delivered personally, or sent by pre-paid first-class post or recorded delivery or by commercial courier, to each party required to receive the notice or communication as in the case of the Bureau its registered office address and in the case of any Member that the current address for that Member in the Bureau's register of Members. Any notice or other communication shall be deemed to have been duly received;
 - (i) if delivered personally, when left at the address; or
 - (ii) if sent by pre-paid first class post or recorded delivery, at 9.00am on the second Business day after posting; or
 - (iii) if delivered by commercial courier, on the date and at the time that their courier's delivery receipt is signed.
- (b) The provisions of this Rule 6 shall not apply to the service of any proceedings or other documents in any legal action.

7. Late Payments

The provisions of Article 17 shall apply to any late payment made under Rule 5 (1) (d).

8. Rule Changes

Subject to all Members receiving 3 months prior written notice of any changes to these Rules from the date of such notice the Bureau may make such changes to these Rules as it may determine from time to time provided that the Bureau will not implement such changes without prior consultation with the Department for Transport.

9. Delegation of Powers

The Board may delegate any powers and functions of the Board under these Rules to the Executive Management of the Bureau.

Appendix B - Data Quality Self-Regulation - Interpretation of Article 76

DATA QUALITY SELF-REGULATION

76 (1) **Interpretation of Article 76**

For the purposes of this Article 76

- (m) “Data Quality Requirements” means the requirements for data on the MID (including but not limited to Mandatory Policy Data) to be complete and accurate and compliant with:-
 - (i) TTS Targets;
 - (ii) The Regulations;
 - (iii) the requirements from time to time stipulated by any governmental body who delegates its authority to the Bureau to operate the MID;
 - (iv) any other guidelines, targets or criteria the Bureau may reasonably stipulate from time to time after prior consultation with any appropriate government body or regulator as the case may be; and
 - (v) any relevant terms contained in any Members’ Participating Insurers Agreement.
- (n) “Insured Motor Vehicle” means any motor vehicle insured by a Member.
- (o) “Mandatory Policy Data” means in respect of each Insured Motor Vehicle the information required or to be provided by each Member pursuant to:-
 - (i) The Regulations; and
 - (ii) the functional specification provided to all Members by the Bureau from time to time.
- (p) “MID 1” means that part of the MID which relates to Insured Motor Vehicles or policies concerning Insured Motor Vehicles which are insured on an individual basis.
- (q) “MID 2” means that part of the MID which relates to Insured Motor Vehicles or policies concerning Insured Motor Vehicles which are not related to MID 1, in particular those generally referred to as “Fleet and/or motor trade”.
- (r) “Sanctions” means additional Member’s Levies by the Members, or cessation of membership of the Bureau imposed upon a Member or Members under the Sanction Rules.
- (s) “Sanction Rules” means the rules determined by the Board from time to time for the procedures, criteria and form for assessing and determining Sanctions, a copy of such rules being provided to Members by the Bureau not less than 3 months prior to them being approved by the Board unless such rules have previously been approved by the Members by special resolution at a general meeting of the Members or in a resolution in writing of the Members.
- (t) “The Regulations” means The Motor Vehicles (Compulsory Insurance) (Information Centre and Compensation Body) Regulations 2003.

- (u) “TTS Targets” means timelines to supply Mandatory Policy Data set by the Bureau from time to time which, at the date of adoption of these Articles, are as follows:-
 - (i) for MID 1 up to 31 December 2007 all Mandatory Policy Data is to be on the MID within 14 days of any relevant change;
 - (ii) for MID 1 from 1 January 2008 all Mandatory Policy Data is to be on the MID within 7 days of any relevant change;
 - (iii) for MID 2 all Mandatory Policy Data concerning policies is to be on the MID within 14 days of any relevant change;
 - (iv) for MID 2 all Mandatory Policy Data concerning an Insured Motor Vehicle is to be on the MID within 21 days of any relevant change.

76 (2) **Overriding Principle of Data Quality Compliance**

Each Member shall use its best endeavours to comply with Data Quality Requirements at all times and such best endeavours shall include but not be limited to:-

- (a) liaising with the Bureau;
- (b) appointing a person of appropriate executive seniority within that Member’s organisation (“the MID Sponsor”), notifying the Bureau of such appointment and liaising with the Bureau in all matters relating to the Member’s satisfaction of the Data Quality Requirements;
- (c) permitting regular monitoring by the Bureau of the Member’s compliance with Data Quality Requirements;
- (d) giving the Bureau such assistance as the Bureau reasonably requires to ensure adequate monitoring of the Member’s compliance with Data Quality Requirements;
- (e) establishing all appropriate and necessary business processes and resources so that the Member can comply with the Data Quality Requirements;

76 (3) **Sanctions**

- (a) Pursuant to the Sanction Rules failure by any Member or Members to comply with :-
 - (iv) Article 76 (2) : or
 - (v) any specific compliance criteria for MID 1 or MID 2 set out in the Sanction Rulesmay in the case of Article 76 (3) (a) (i) result in the Bureau imposing Sanctions, including if the Bureau so determines cessation of membership of the Bureau, of a Member pursuant to Article 11 and in the case of Article 76 (3) (a) (ii) result in a Member or Members paying additional Member’s Levies to the Bureau pursuant to the Sanction Rules in addition to those payable under Article 15.
- (b) Each Member agrees to be bound by and adhere to:-

- (iii) any determination of the Bureau pursuant to the Sanction Rules as final and binding subject only to the rights of appeal set out in Article 76 (4) provided always that in the event of any inconsistency between these Articles and the Sanction Rules the Sanction Rules shall prevail; and
- (iv) the provisions of paragraph 1 of the Sanction Rules.

76 (4) **Appeals**

Any appeal against any Sanction shall be dealt with pursuant to the Sanction Rules save in respect of any decision to have a Member's Membership of the Bureau cease in which case such Member shall be entitled to appeal any decision of the Bureau in the English Court under any remedy such Member may have at law.