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ANNUAL REPORT 2018

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ELTO made further progress during the course of 2018, with improving success rates and investment to ensure that the service is fit for purpose and able to meet its strategic objectives.

STRATEGIC OBJECTIVE 1

ELTO is the key route for claimants to trace an insurer

ELD holds over **25 million** records covering 37 million policy years

89.7% of disease enquiries get a successful response **98.0%** of accident enquiries get a successful response

STRATEGIC OBJECTIVE 2

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

113,608

successful enquiries

STRATEGIC OBJECTIVE 3

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

Overall Search Success Improved to

92.7%

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 Net customer **71.7%**

Net member **75.6%** satisfaction score of



ELTO was set up in 2011 to help claimants identify their employer's insurer. Seven 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.



As I finish my first full year as Chairman of ELTO, I am pleased to report that ELTO has continued to deliver high enquiry success rates for the key service it provides to those individuals looking to find a responsible Employers' Liability insurer. ELTO and its Members were able to trace an insurer for

92.7% of enquiries in 2018, a new high, which is another considerable achievement. It is also worth noting that now over 80% of enquiries successfully identify an insurer from the Employers Liability Database (ELD), which is testament to the work ELTO members have done to ensure a complete and up to date database.

ELTO's commitment to ensuring that claimants can successfully trace their employers' insurer through the service remains a key objective and we continue to invest in improving our service. One of these key improvements is ensuring ELTO can access HMRC data, which will enable ELTO members to obtain employer reference numbers (ERN) directly from them. 2018 has seen important progress made with HMRC, with a successful pilot completed and further discussions ongoing to ensure long term access to ERN data can be realized and secured. We are hopeful a project can commence in 2019 to start populating the Employers' Liability Database (ELD) with ERNs in this way.

Around 123,000 enquiries were made through the ELTO service in 2018. The greater the proportion of records that are populated with an ERN on the ELD, the higher the number of successful matches that will be achieved through using this unique identifier, which should continue to improve the user experience of the service and speed up the results for them.

I have been involved with ELTO since 2010 and have seen the service grow into an established and successful tracing office. Behind this is the investment the industry has committed to ensure the service is successful and it is clear to me that the industry remains highly focused in maintaining that level of success. This is evidenced by a number of Member Companies undertaking initiatives to load all their data onto the ELD following the launch of the ELTO Upload Policy in 2018, which is focused towards eliminating the risk of legacy industry knowledge being lost. Another long-term commitment ELTO has invested in is having a team of tracing investigators looking at failed enquiries, with further enhancements made to this service in 2018.

These important steps taken by ELTO and its Members is reconfirmed when we look at the success of searches made against historic records, that is records with a cover end date earlier than April 2011, where overall 90.7 % is successfully found and importantly the overall success rate by individual claimants has also increased to 96.7%.

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 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.

Steve Browne, Chair

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 operational priority for ELTO continues to be to provide a successful service that performs consistently. The programme of work agreed was to support the following operational activities:

- ELD system development
- 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

During 2018 ELTO took time to look at the customer journey that users currently undertake to try to identify improvements. An independent company was used for this work and undertook interviews with users to understand the good and the bad points about the system. The results showed that service was doing the job it needed to, but some enhancements could be made to improve the overall customer journey. The output from this work has resulted in a project for 2019 to make improvements. One of the other developments in 2018 was investing in a Proactive Tracing Investigator Portal. This enables the Tracing Investigator team to view extended search enquiries before they are issued to members for tracing. The aim of the change is to help improve the way users use the service by allowing the Tracing Investigator to potentially improve the quality of the search or in some cases identify the insurer before it is sent to members, therefore speeding up the time taken for an insurer to identified.

GDPR

Work was undertaken in 2018 to ensure the ELTO end to end service offering, processes and procedures complied with GDPR, changes included updating the terms and conditions on the site and ensuring the service complies with GDPR.

Benefits:

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



Support Members with Financial Conduct Authority (FCA) requirements

HMRC Dialogue

In early 2018 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. Pleasingly the initial results suggest that we can significantly improve upon the industry's ERN compliance results. Discussions continued throughout 2018 about how we can move forward with automating a long-term data matching process with HMRC, which are now continuing as we look to implement a project in 2019.

Initial discussions have also taken place with the FCA to see how the long-term solution can work for the industry in supporting them with their requirement to collect ERNs.

Benefits

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

Time to supply

Overall time to supply for 2018 has increased to 86%. This is a 4.1% increase from 2017. This continues to be an important focus for ELTO and it is important that we recognize it is a regulatory measure which the industry is striving to achieve. However, alongside this it is equally important that the completeness of the ELD is recognized. So, whilst time to supply may not be in line with the regulatory requirement the completeness of the ELD has improved as in most of the cases time to supply has been impacted by members adding data that was not previously on the database.

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

User survey

Each year ELTO undertakes a Customer and Member Satisfaction survey. They are important measures and key KPIs for how the service is performing.

Members

The net satisfaction score also increased from 75.1% in 2017 to 75.6% in 2018. This shows the consistent service that is being provided.

Kou Drivoro	Year-on-year			
Key Drivers	Oct-2017	Oct-2018	Change	
Response rate	33%	44%		
ELD core functions	69.7%	64.1%	+	
Simple search function	65%	74.2%		
Helpdesk	94.4%	90.4%	+	
ELTO website	60.4%	65.3%		
Overall ELTO service	93.8%	89%	+	
Results	75.1%	75.6%		



Operational statement

Registered Users results

The 2018 survey showed that Overall satisfaction has significantly increased from 57.1% to 71.7%.

Key Drivere	Year-on-year			
Key Drivers	Oct-2017	Oct-2018	Change	
Response rate	16%	19%		
ELTO Website	61.6%	77%		
Simple search function	49.2%	71.4%		
Simple search (time taken)	43.1%	54.4%		
Simple search satisfaction	72.6%	81.9%		
Extended search	41.2%	57.3%		
ELTO contact	54.5%	66%		
Overall ELTO service	68.2%	79.6%		
Overall results	57.1%	71.7%	-	

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. At the end of May 2019 the fourth cycle of tracing audits was complete achieving a KPI of 79.8%, increased from a KPI of 70.4% in the third cycle. The fifth cycle of tracing audits for 96 Members is now underway and is on course for completion in 2020.

The tracing audits are an important part of the work ELTO does and the Board believe it is important to recognise the improvements that have been made in this area since ELTO first started back in 2011. The overall KPI has improved by c.20%, this is testament to the investment that ELTO members have put into this area. The individual scores for each cycle of tracing were as follows:

ELTO Tracing Audit Pe	rformance by Cycle
Cycle 1	56.2%
Cycle 2	66.5%
Cycle 3	70.3%
Cycle 4	79.8%

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.

In 2018 ELTO published an Historic Upload Policy. Where a Member believes that all Employer Liability policy records they hold are accurately represented on the Employers Liability Database ('ELD') they may be eligible for an historic upload audit. These audits also focus on two main areas – the identification of available records and the completeness and accuracy of those records held on the ELD. Where a Member passes an historic upload audit they are no longer required to perform regular tracing activity and are not subject to subsequent tracing audits. Therefore the volume of Members eligible for a tracing audit may decrease between cycles. 11 Members have successfully achieved the historic upload criteria in the fourth cycle.

Under the terms of the ELTO-FCA Co-operation Agreement the FCA continue to receive the results 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 2019, ELTO is providing these services to 46 Members that have requested it do so. In 2018, these services were provided to 35 Members.

Financial Overview

The ELTO budget for 2018 was set with the base figure of £2,367k. This reflected a small increase of £80k on the 2017 levy. The main contributor to the increase was increased running costs of the service.

Overall search enquiry success rate



By result type



Accident and disease search enquiries





ELTO - the year in numbers

Claimant search enquiry success rate

The overall volume of enquiries through the service continued to fall through 2018, 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.



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

ELTO - the year in numbers

ELCOP/ELTO enquiries and success rate trends



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

Exposure periods - consistent high performance across all exposure periods

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



8

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	7,187	6,698	93%	7.6%
2	Birmingham	2,661	2,488	93%	2.8%
3	Manchester	2,240	2,109	94%	2.4%
4	Leeds	1,925	1,775	92%	2.0%
5	Sheffield	1,674	1,562	93%	1.8%
6	Liverpool	1,547	1,398	90%	1.6%
7	Nottingham	1,438	1,332	93%	1.5%
8	Glasgow	1,177	1,029	87%	1.2%
9	Hull	1,139	1,059	93%	1.2%
10	Leicester	1,024	965	94%	1.1%



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

Number	Disease	Enquiries	Successful Traces	Success Rate	% of all claimant enquiries	% of all claimant disease enquiries*
1	Noise Induced Hearing Loss	32,971	29,960	91%	34.8%	63.0%
2	Mesothelioma	6,769	5,330	79%	7.1%	12.9%
3	Asbestosis	3,098	2,588	84%	3.3%	5.9%
4	Pleural Thickening	1,719	1,406	82%	1.8%	3.3%
5	Pleural Plaques	1,519	1,232	81%	1.6%	2.9%
6	Asbestosis Related Illness	1,149	1,011	88%	1.2%	2.2%
7	Repetitive Strain Injury (RSI)	901	879	98%	1.0%	1.7%
8	Abestosis Related Cancer	819	711	87%	0.9%	1.6%
9	Hand Arm Vibration Syndrome (HAVS)	659	628	95%	0.7%	1.3%
10	Vibration White Finger (VWF)	592	562	95%	0.6%	1.1%

* Based on total claimant enquiries of 94,744

ELTO - the year in numbers





Policy type

COMPULSORY COUNT

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 postimplementation of the ELD but relate to records with inception dates pre-ELD implementation.

VOLUNTARY COUNT

8.9m

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





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:

Steven Browne - Chair AXA Insurance UK PIc (Chair from March 2018)

Helen Bancroft Allianz Insurance Plc (Appointed 12 March 2019)

Ashley Boardman Covea Insurance (Appointed 23 June 2016)

Paul Bogle National Federation of Builders Ltd (Appointed 11 December 2018)

Bob Donovan Aviva Insurance Ltd (Appointed 5 December 2011)

Grace Flowers Zurich Insurance Plc (Appointed 11 December 2018) **Richard Guest**

RSA Group (Appointed 12 March 2019)

Roland Jackson Catalina Worthing Insurance Limited (Appointed 19 June 2014)

Richard Jeffs National Federation of Builders (Resigned June 2018)

Matt Lacy QBE European Operations (Appointed 19 June 2014)

Shaun Randell Brit Insurance Ltd (Resigned Dec 2018)

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 proportion of EL insurers who opted to join ELTO as members remained extremely high, increasing from 182 at the end of 2017 to 185 at the end of 2018. 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 2018. 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.

Statement of comprehensive income of the year ended 31 December 2018

		As restated
	2018	2017
	£	£
Turnover	2,338,291	2,328,285
Administrative expenses	(2,338,026)	(2,327,991)
Operating profits	265	294
Interest payable and similar charges	(265)	(294)
Profit of the year	-	-

Balance sheet as at 31 December 2018

				As restated	
	201	2018		2017	
	£	£	£	£	
Current assets					
Debtors	1,302,843		573,168		
Cash in hand	232,512		137,173		
	1,536,355		713,341		
Creditors:					
Amounts falling due within one year	(1,535,355)		(710,341)		
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 2017 or 2018, but is derived from those accounts. Statutory accounts for 2017 and 2018 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.

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 24 July 2019 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

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 2018.

In accordance with the requirements in ICOBS 8.4.9R (7)(a) of the Financial Conduct Authority ("FCA") Handbook effective as at 31 December 2018, the Board of Directors of the Employers' Liability Tracing Office ("ELTO") are able to confirm that for the year to 31 December 2018, ELTO complied in all material respects with the requirements in ICOBS 8.4.9R (1) to (6). The financial statements were approved and authorised for issue by the Board and were signed on its behalf on 24 July 2019.

Steve Browne, Chair

Independent Assurance Report to the Directors of Employers' Liability Tracing Office on the requirements of ICOBS 8.4.9 of the FCA Handbook in respect of the year ended 31 December 2018.

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

Respective responsibilities of the Directors and Nexia Smith & Williamson

- 4. The Directors of the Company are responsible for the Company's policies for the accuracy and completeness of the Database and for ensuring that the Company complies with all relevant requirements of the FCA including those of ICOBS 8.4.9 in order to meet the requirement of a Qualifying Tracing Office.
- 5. The Directors of the Company are responsible for preparing a certificate stating whether the Company has complied with the requirements in ICOBS 8.4.9 (1) to (6) in relation to the year ended 31 December 2018. The Directors have included their report in this published annual report.
- 6. As set out in paragraph 1, our responsibility is to form an independent opinion based on our assurance procedures, addressing the accuracy and completeness of the Database for the year ended 31 December 2018.
- 7. This report, including our opinion, has been prepared for the Company to assist the Directors in complying with ICOBS 8.4.9 of the FCA Handbook. As required by ICOBS 8.4.7 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

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

Our work included the following procedures:

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

Inherent and other limitations

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

Our reference to accuracy and completeness of the Company's database relates only to the accurate and complete maintenance of data uploaded to the database by the Underwriters. Accordingly, our assurance work has not included an examination of the data uploaded to the database by those firms required to maintain an employers' liability register under ICOBS 8.4.4 of the FCA Handbook. Our assurance work has not included examination of the derivation of the information contained within such employers' liability registers nor upon any other third party information.

Conclusion

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 2018, and that there are systems in place which can adequately keep the database up to date in the light of new information provided by the Underwriters, in accordance with the requirements of ICOBS 8.4.9 of the FCA Handbook.

24 July 2019

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

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.



www.elto.org.uk