



# ELTO 2024 Annual Report



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## ELTO 2024 Annual Report

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## 2024 achievements

Throughout 2024, Employer's Liability Tracing Service (ELTO) continued its upwards trajectory, achieving higher success rates and bolstering investments to align the service with its strategic objectives, ensuring its effectiveness and adaptability.

### STRATEGIC OBJECTIVE 1

ELTO is the key route for claimants to trace an insurer

ELTO holds over **40 million** records covering **51 million** policy years

**81.1%** of disease enquiries get a successful response

**97.9%** of accident enquiries get a successful response

### STRATEGIC OBJECTIVE 2

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

**91,299**  
successful enquiries

### STRATEGIC OBJECTIVE 3

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

Overall success rate

**87.4%**

### STRATEGIC OBJECTIVE 4

ELTO is run efficiently for the industry's policyholders

ELTO is the only regulated tracing office in the UK

**84.7%** Net customer satisfaction score

**84.3%** Net member satisfaction score

Results from annual Customer and Member Satisfaction survey

## Chair's statement

**ELTO's enduring vision – to ensure that anyone affected by a work-related illness or injury can quickly and easily trace their employer's insurer – remains as critical now as it was when ELTO was first established. This year, however, saw us at a crossroads, balancing the need for reliable day-to-day operations with the bold step of planning for a transformational future.**

2024 presented significant operational and strategic challenges. It became increasingly clear that our legacy technology would struggle to meet the evolving needs of our Members, claimants or the regulatory environment. Despite our best efforts to upgrade our existing infrastructure, it was evident that continuing with a piecemeal approach would not deliver the long-term resilience and performance we require. As a result, I'm pleased to announce that the ELTO Board made the strategic decision to embark on a comprehensive infrastructure transformation programme to replatform the Employers' Liability Database (ELD).

This is a big decision for ELTO, but I'm confident it's the right one. Our technology has served us very well over the years, but this investment will ensure we remain fit for purpose for the next generation, with improved scalability, enhanced cyber security and modern functionality that better supports our mission.

In the meantime, I'm proud to say that ELTO has continued to deliver a highly effective and trusted tracing service. In 98% of searches, claimants were able to trace their employer's insurer from policies loaded since the launch of the ELD – supporting over 60,869 individuals in tracing their employer's insurer. We've also maintained our focus on security by migrating our public-facing systems behind a Web Application Firewall, reinforcing our defenses against rising cyber threats generally facing all businesses.

Member engagement remained high throughout the year. Satisfaction among Members rose to 84.3%, and claimant satisfaction also increased significantly – up 5.2 percentage points to 84.7%. These results reflect the care and commitment of the ELTO team and our partners, who have worked tirelessly to support users while preparing for the changes ahead.

I would also like to take this opportunity to highlight the successful completion of the sixth cycle of our tracing audit programme. When ELTO began its tracing audit programme in July 2012,

the Board set a minimum target (KPI) for the industry to achieve – a tracing audit score of 85%. I am thrilled to share that for the first time, the industry has achieved this aspirational score.

This is a fantastic achievement and a testament to the hard work of Members. However, as the results also showed, performance is not yet consistent across all organisations. There is more to do to ensure all Members meet their obligations with the same dedication.

In closing, I want to thank the ELTO team, our partners and our Member organisations for their support and commitment during this important year. As we move forward into 2025 and begin the next phase of ELTO's evolution, we do so with clarity of purpose and confidence in our shared mission.



**Steve Browne, Chair**





# Operational statement

**Our mission: 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 employer's insurer.**

## 2024 in focus

Despite a year of strategic transition, ELTO's operational focus remained firmly on delivering a reliable and effective tracing service, while laying the foundation for the future transformation of the ELD platform.

## Key highlights

- ▶ **Launched a technology transformation initiative**  
The ELTO Board has approved a rebuild of the ELD platform. This strategic shift will deliver a modern, secure and scalable system, future-proofed for the years ahead.
- ▶ **Improved cyber protection**  
We migrated our websites and the ELD behind a Web Application Firewall (WAF), significantly enhancing cybersecurity and protecting against external threats.
- ▶ **Maintained high service levels**  
ELTO supported more than 91,000 claimants – 88% of whom were able to trace a policy instantly.
- ▶ **Enhanced functionality and reporting**  
We delivered targeted functionality upgrades to improve user experience and continued to evolve our Management Information (MI) capabilities for Members through improved reporting tools and a planned virtual Datamart migration.

## Service performance

- ▶ **Time to Supply (TTS)**  
Decreased slightly to 81.8%, but still within expected tolerances.
- ▶ **Extended search engagement**  
Response rate for 2024 was 83%, though successful responses dropped marginally from 48.6% in 2023 to 47.1% in 2024.
- ▶ **Search success**  
In 98% of searches, claimants were able to trace their employer's insurer from policies loaded following the launch of the ELD – supporting over 32,700 individuals in tracing their employer's insurer.
- ▶ **Extended searches managed**  
Our own Tracing Investigators reviewed 15,405 extended searches, and were able to reduce referrals to Members by 3,413, demonstrating the efficiency of internal triaging processes.

## User feedback

### ► Claimant satisfaction

Increased by 5.2 percentage points to 84.7%, with strong gains in clarity of information (+4.4%) and relevance of search results (+6.1%).

### ► Member satisfaction

Increased to 84.3%, with improvements in member enquiry satisfaction (+11.2%) and customer service and helpfulness (+5.5%).

We also recognised areas needing improvement, particularly search performance and user training. In response, we have begun offering targeted training workshops for claimants and Members to ensure users can make the most of the system.

## Audit Success

We completed the sixth cycle of ELTO's tracing audit programme – an initiative first launched in 2012 to drive accountability and continuous improvement and saw the Board set a minimum target (KPI) for the industry to achieve – a tracing audit score of 85%. For the first time since launching the ELD, the industry has now achieved this aspirational score. This is a significant milestone and reflects our collective progress. However, results varied across organisations, highlighting the need for continued diligence and support to bring all Members up to the required standards.

## Looking ahead

2025 marks the start of a major transition for ELTO. Our transformation programme will begin in earnest, but our commitment to excellent service will not waver. With the support of our Members, we are confident in our ability to deliver a new platform that meets the expectations of claimants, insurers and regulators alike.

Together, we will build the future of EL tracing – one that is secure, resilient and ready for the challenges ahead.

# ELTO - the year in numbers

## Overall search enquiry success rate

Review period:

**2024**

Total enquiries

**91,299**

Successful traces

**79,773**



Review period:

**2023**

Total enquiries

**120,915**

Successful traces

**106,678**



decrease

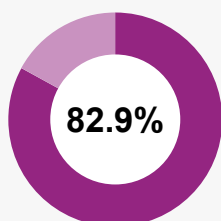
**-1.4%**

## By result type

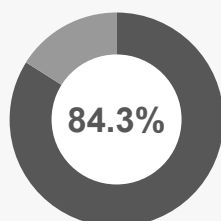
### Simple search enquiry

Successful enquiries immediately obtained from the database.

**2024**



**2023**



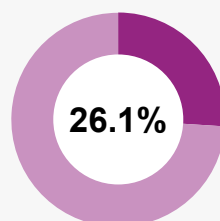
decrease

**-1.4%**

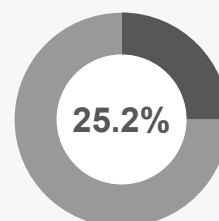
### Extended search enquiry

Successful enquiries obtained from members searching their records.

**2024**



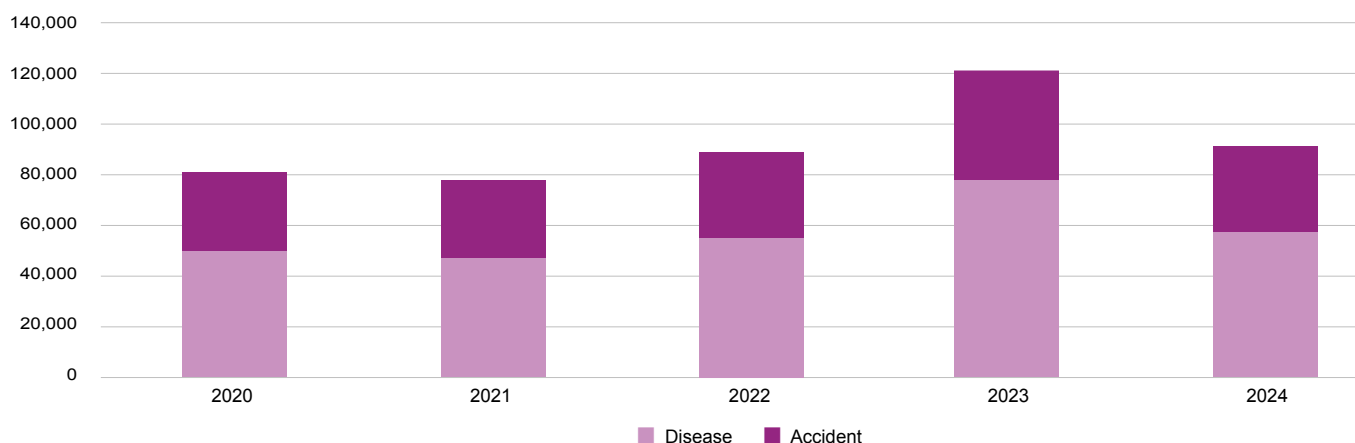
**2023**



**0.95%**

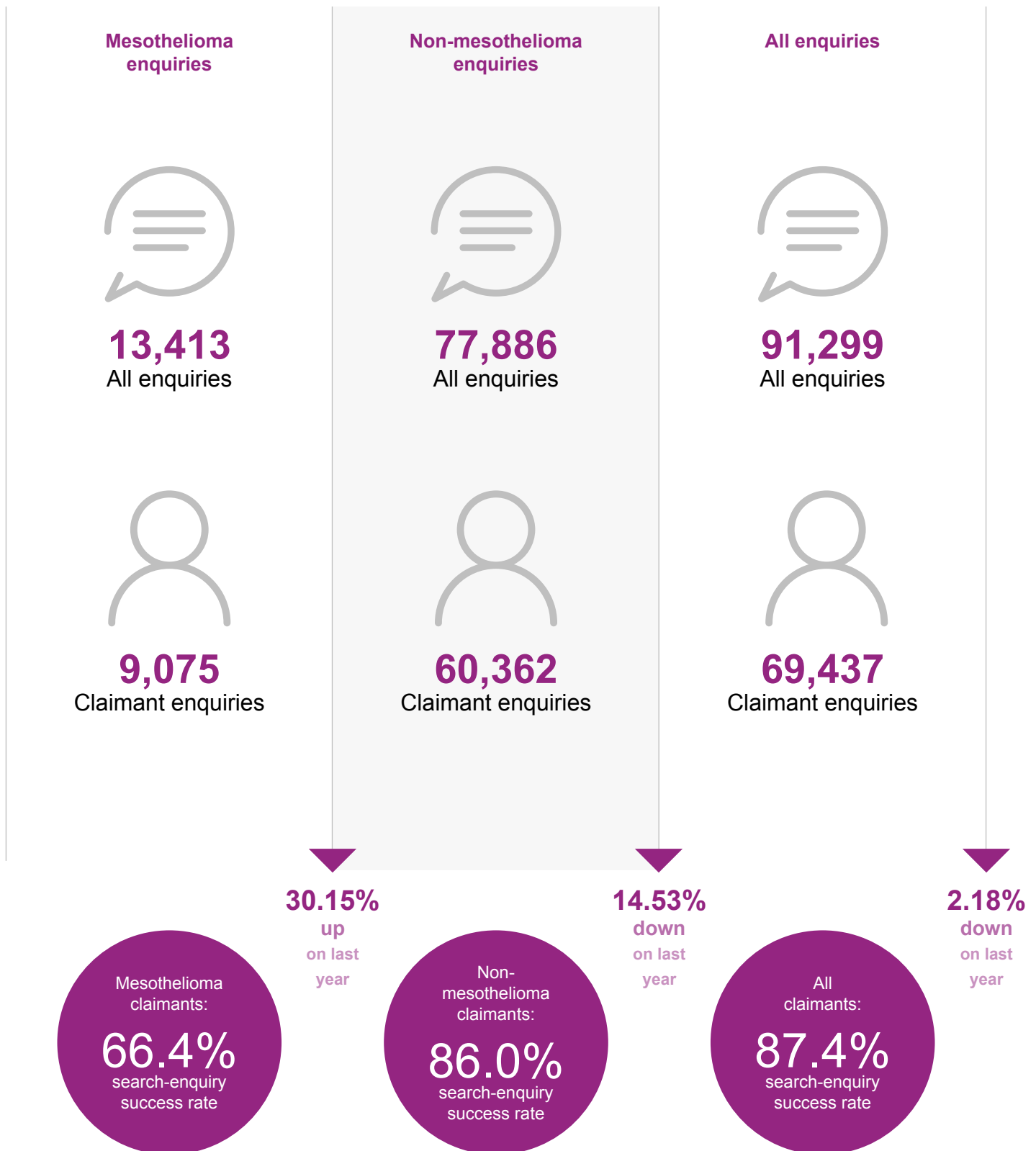
increase

## Split of ELD enquiries by accident or disease (%)



## Claimant search-enquiry success rate

The overall volume of enquiries through the service in 2024 was significant with **simple search success rates remaining high at 82.9%**. This indicates enquirers are able to find a policy instantly on the ELD without the search going to an extended search.

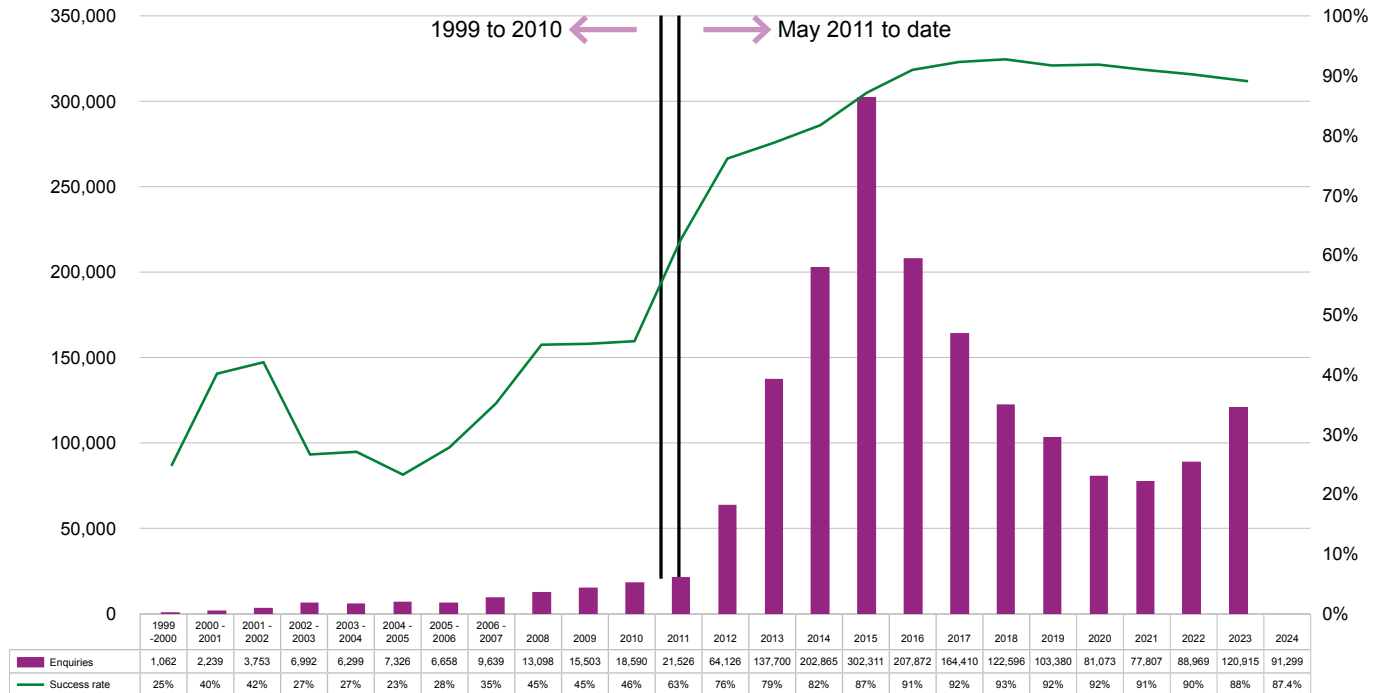


The same individual claimant can appear in the both the mesothelioma and non-mesothelioma category.



## ELCOP/ELTO enquiries and success-rate trends

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

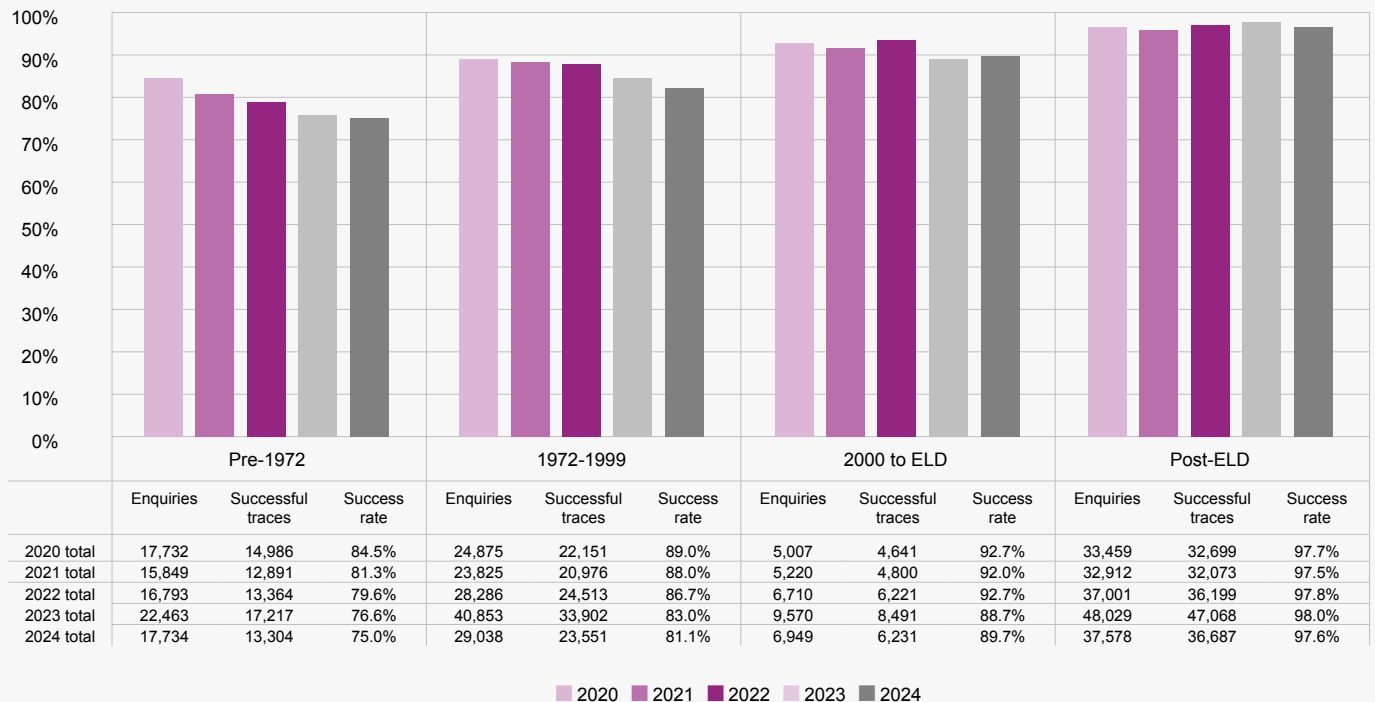


Note: No data is available for the period January to April 2011.

## 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, they continue to be above 90% for all post-1972 exposure periods.

ELD success rate – exposure period trends

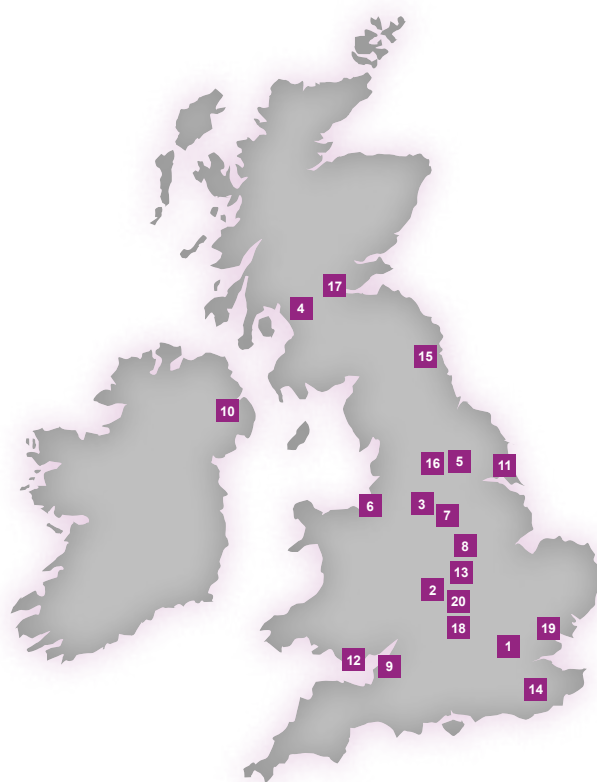


## Claimant and defendant periods of exposure (Pre-1972, 1972-1999, 2000-ELD, Post-ELD)

Enquiry type	Fast track (Mesothelioma) enquiries			Non fast track enquiries			Total enquiries		
	Enquiries	Successful traces	Success rate	Enquiries	Successful traces	Success rate	Enquiries	Successful traces	Success rate
Claimant enquiries	9,075	5,940	65.5%	60,362	51,686	85.6%	69,437	57,626	83.0%
Defendant enquiries	4,338	2,966	68.4%	17,524	15,112	86.2%	21,862	18,078	82.7%
<b>Total enquiries</b>	<b>13,413</b>	<b>8,906</b>	<b>66.4%</b>	<b>77,886</b>	<b>66,798</b>	<b>85.8%</b>	<b>91,299</b>	<b>75,704</b>	<b>82.9%</b>

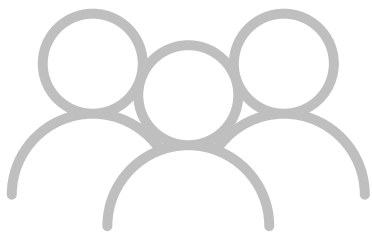
## The top 20 employer locations as identified by claimant search enquiries on ELD

	Employer location	Enquiries	Successful traces	Success rate	% of all claimant enqs
1	London	6,891	6,131	89%	9.9%
2	Birmingham	1,611	1,384	86%	2.3%
3	Manchester	1,549	1,358	88%	2.2%
4	Glasgow	1,391	1,149	83%	2.0%
5	Leeds	1,164	1,009	87%	1.7%
6	Liverpool	988	829	84%	1.4%
7	Sheffield	944	790	84%	1.4%
8	Nottingham	729	647	89%	1.0%
9	Bristol	718	602	84%	1.0%
10	Belfast	704	642	91%	1.0%
11	Hull	589	490	83%	0.8%
12	Cardiff	548	480	88%	0.8%
13	Leicester	525	419	80%	0.8%
14	Kent	517	461	89%	0.7%
15	Newcastle	484	438	90%	0.7%
16	Bradford	471	423	90%	0.7%
17	Edinburgh	464	353	76%	0.7%
18	United Kingdom	429	390	91%	0.6%
19	Essex	392	352	90%	0.6%
20	Coventry	359	325	91%	0.5%



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

	Disease	Enquiries	Successful traces	Success rate	% of all claimant enqs	% of all claimant disease enqs
1	Noise-induced hearing loss	17,739	14,814	84%	25.5%	47.0%
2	Mesothelioma	9,075	6,411	71%	13.1%	24.0%
3	Asbestosis	3,207	2,397	75%	4.6%	8.5%
4	Asbestosis-related illness	1,762	1,390	79%	2.5%	4.7%
5	Pleural plaques	1,277	889	70%	1.8%	3.4%
6	Pleural thickening	1,207	876	73%	1.7%	3.2%
7	Asbestos-related cancer	714	531	74%	1.0%	1.9%
8	Vibration white finger (VWF)	677	622	92%	1.0%	1.8%
9	Asbestos-related cancer	903	700	78%	0.9%	1.5%
10	Repetitive strain injury (RSI)	581	562	97%	0.6%	1.0%



## Registered users

In **2024**, the number of **registered users** who had made at least one enquiry in the last two years.

# 2,351

## Policy records held on the ELD

At the close of Q1 2024, the ELD contained **37.0 million policy records** covering the equivalent of more than **48.6 million policy years**, of which 9.3 million are voluntary policy records, representing nearly 21 million policy years.



## Time to supply policy records onto the ELD

% of records supplied within expected period \*

# 81.8%

\* The expected period to supply the data is 90 days

## Policy type

### COMPULSORY COUNT

# 27.6m

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 with inception dates pre-ELD implementation



### VOLUNTARY COUNT

# 9.3m

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 34.8m**

# 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 Plc  
(Chair from March 2018)

### Steve Penny

Allianz Insurance Plc  
(Appointed 20 December 2024)

### Kelly Morrison

RSA Group  
(Appointed 19 June 2024)

### Kelly Beach

Zurich  
(Appointed 7 December 2022)

### Emma Lawton

PwC  
(Appointed 7 June 2020)

### Richard Beresford

National Federation of Builders  
(Appointed 7 December 2022)

### Graeme Trudgill

BIBA  
(Appointed 20 November 2019)

### Steve Chinn

Covea Group  
(Appointed 8 June 2022)

### Peter Webb

Aviva  
(Appointed 24 November 2020)

### Darren Rowswell

Catalina Worthing Insurance  
(Appointed 14 September 2022)



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 217 at the end of 2023 to 221 at the end of 2024. 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 minimis level of £5 million are liable to pay a levy.

## FCA Tracing Office audit

ELTO's service satisfied the FCA Tracing Office requirements during 2024. Please see the Independent Assurance Report on pages 15 to 16. 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 for the year ended 31 December 2024

	Note	2024 £	2023 £
Turnover		3,242,804	3,300,929
<b>Gross profit</b>		<b>3,242,804</b>	3,300,929
Administrative expenses		(3,242,804)	(3,300,929)
<b>Operating profit</b>	3	-	-
Tax on profit		-	-
<b>Profit for the financial year</b>		-	-

## Balance sheet as at 31 December 2024

	Note	2024 £	2023 £
<b>Current assets</b>			
Debtors: amounts falling due within one year	5	80,749	36,452
Cash at bank and in hand		1,853,825	1,447,227
		<b>1,934,574</b>	1,483,679
Creditors: amounts falling due within one year	6	(1,934,574)	(1,483,679)
<b>Net assets</b>		-	-
<b>Capital and reserves</b>		-	-
<b>Total equity</b>		-	-

## 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 2024 and were audited by CLA Evelyn Partners Limited, 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

# Directors' 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 2024.**

In accordance with the requirements in ICOBS 8.4.9R(7)(a) of the Financial Conduct Authority (FCA) Handbook effective as at 31 December 2024, the Board of Directors of the Employers' Liability Tracing Office (ELTO) are able to confirm that for the year to 31 December 2024, 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.



**Steve Browne, Chair**



# Independent assurance report

## **Independent Assurance Report to Liability Tracing Office on the requirements of ICOBS 8.4.9 of the FCA Handbook in respect of the year ended 31 December 2024.**

- 1) We have been engaged 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 2024. 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 2024.
- 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 S&W Partners Audit Limited

- 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 2024. 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 2024.
- 7) This report, including our opinion, has been prepared for the Company to assist the Directors in complying with ICOBS 8.4.9 of the FCA Handbook. As required by ICOBS 8.4.7 1(b), we permit the disclosure of this report by the Directors in their published annual report to enable the Directors to demonstrate they have discharged their governance responsibilities by commissioning an independent assurance report in connection with those requirements of ICOBS 8.4.9 that relate to the accuracy and completeness of the Company's database. To the fullest extent permitted by law, we do not accept or assume responsibility to anyone other than the Company for our work or this report save where terms are expressly agreed in advance and with our prior consent in writing.

## Assurance work performed

- 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) We apply International Standard on Quality Management 1 and, accordingly, maintain a comprehensive system of quality management including documented policies and procedures regarding compliance with ethical requirements, professional standards and applicable legal and regulatory requirements.
- 10) We have complied with the independence and other ethical requirements of the Code of Ethics issued by the Institute of Chartered Accountants in England and Wales, which is founded on fundamental principles of integrity, objectivity, professional competence and care, confidentiality and professional behaviour.
- 11) 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 2024. 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 2024.

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 2024;
- ▶ 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

- 12) 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

**13)** 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 2024, 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.

## Use of our report

**14)** This report is made solely to the Company in accordance with the terms of our engagement. Our review has been undertaken so that we might state to the Company those matters we are required to state to it in this report and for no other purpose. To the fullest extent permitted by law, we do not accept or assume responsibility to anyone other than the Company for our review work, for this report or for the conclusions we have reached.

### **S&W Partners Audit Limited**

Cumberland House,  
15-17 Cumberland Place,  
Southampton,  
SO15 2BG

XX June 2025

# Glossary

## Compulsory record type

Policy records as defined by the necessary instruments issued by the FCA and relating 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 relating to records with inception dates pre-ELD implementation.

## Employers' Liability Tracing Office (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, or 'database' as referred to in this report, launched in April 2011 and contains all new and renewed EL 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 ELTO tracing service.

## Employer reference number (ERN)

The 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 ERNs (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. The FCA is the regulator for financial services firms and financial markets in the UK GDPR <https://ico.org.uk/for-organisations/guide-to-data-protection/>

## HMRC

His 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 reissued 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.



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