

ELD NextGen Q&A Document

Frequently Asked Questions

Purpose of this Document

This document provides answers to common questions raised by insurers and delegated authorities about the ELD NextGen changes.

It brings together questions raised through workshops, webinars and direct feedback. The document will be updated regularly as further detail is confirmed, including API documentation, transition planning, portal registration and cutover arrangements.

Where an answer is still subject to final confirmation, this is marked as *Further guidance will follow*.

Key terms

Term	Definition
API	An Application Programming Interface. In this context, the API is the system-to-system route used to submit policy data to ELD.
Direct API submission	A submission where policy data is sent directly in the API request body.
API file upload	A submission where a file is uploaded through a secure API-led process.
Policy key	The set of fields used to uniquely identify a policy record. Previously known as the Compend or Compound key
Supplementary policy reference	An optional reference that forms part of the policy key where supplied. Previously known as the BrokerDARef.
Parent / child hierarchy	The current ELD structure where a parent policy may have one or more child policies. This hierarchy is being removed in the new model.
Single policy record	The new structure where a policy contains all covered employers at equal standing.
Adjusted employer cover dates	Employer-level dates used where a specific employer's cover period differs from the overall policy cover period.
CRN	Company Registration Number. This is optional.
ERN	Employer Reference Number
Status endpoint	The API endpoint used to check the processing status and validation results for a submission.
ELD policy management area	The area of the ELD portal where users can manage policies and view submission status and validation results.

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1 About the Change

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1.1 What is changing?

ELD policy data submission is moving from the existing SFTP file-drop process to a modern HTTPS API.

The new approach supports:

- direct API submission for smaller or more immediate updates;
- bulk file upload through the API;
- standard JSON and pipe-delimited text formats;
- clearer validation responses;
- improved visibility of submission status and validation results;
- a simplified policy data model.

The data model is also changing. In the new model, policies will be structured as a single policy record containing all covered employers, rather than using the existing parent/child hierarchy.

1.2 Why is ELTO making this change?

The change is intended to improve the reliability, sustainability and usability of ELD policy management.

The key objectives are to:

improve data quality;

- simplify and modernise submission processes;
- reduce operational complexity;
- provide clearer validation feedback;
- improve auditability and traceability;
- support future integration through modern APIs;
- improve visibility of submission status and errors.

1.3 Is this only a technical change?

No. Although the API is a technical change, the programme also affects business and operational processes.

Insurers should consider the impact on:

- existing SFTP submission processes;
- operational teams who review errors;
- portal users;
- delegated authority arrangements;
- data reconciliation activity;
- cutover and transition planning;
- compliance and audit processes.

1.4 What documents should insurers review?

Insurers should review the ELD NextGen overview material, the Policy Management Summary of Changes, the API Outline Specification and this FAQ document.

Further API documentation and supporting guidance will be released as the programme progresses.

2 Timeline, Transition & Cutover

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2.1 When is go-live planned?

The current target is a phased release during Q1 2027, currently expected between January and March 2027.

Further detail will be confirmed through the transition plan.

2.2 Will existing policy data need to be re-supplied?

No. Existing policy data will be migrated automatically into the new platform.

Insurers will not need to re-supply existing historic policy records as part of the migration.

2.3 Will SFTP be switched off at go-live?

Once an organisation has transitioned to the new platform, its SFTP access will be revoked.

The current SFTP service is expected to be turned off from April 2027.

Further guidance will be provided as part of the transition plan.

2.4 Will there be a period of tandem running between SFTP and the new API?

The detailed cutover approach is still to be confirmed.

ELTO will provide further guidance on the transition process, including any planned parallel running, migration windows, support arrangements and final cutover expectations.

2.5 Can insurers stay on the old database beyond March 2027?

The current target is to transition insurers to the new ELD platform during Q1 2027, with the current SFTP service expected to be turned off from April 2027.

Any insurer-specific readiness concerns should be raised with ELTO as early as possible so they can be considered as part of transition planning.

2.6 Will there be a detailed transition plan?

Yes. ELTO will provide a detailed transition plan.

This is expected to include:

- key dates;
- onboarding activities;
- registration requirements;
- testing expectations;
- cutover arrangements;
- support arrangements;
- any migration or freeze windows;
- actions required from insurers and delegated authorities.

Further updates will be provided during the transition period.

2.7 What does “registration and planning” mean in practice?

Registration and planning refers to the preparation activity that insurers and delegated authorities will need to complete before moving to the new ELD platform.

This is expected to include:

- confirming technical, operational and communication contacts;
- identifying current SFTP feeds and batch processes;
- deciding which submission routes will be used;
- preparing for portal user registration;
- identifying delegated authority arrangements;
- planning internal testing;
- preparing for cutover.

Further onboarding guidance will be provided.

2.8 Who should insurers involve internally?

Insurers should involve representatives from:

- policy operations;

- delegated authority teams;
- data teams;
- IT and integration teams;
- compliance and audit;
- portal user administration;
- business change or operational readiness teams.

Organisations should also identify who currently owns SFTP submissions and who will own API onboarding.

2.9 Will end-user training be provided?

Yes. The platform is being designed to be simple and intuitive, and online training will be provided.

ELTO also intends to provide walkthroughs, guidance material and drop-in sessions to support users before and during rollout.

3 Support, Engagement & Communications

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3.1 Will there be more workshops or discussion sessions?

Yes. ELTO intends to continue engagement through webinars, workshops and drop-in sessions.

These sessions will support both business and technical audiences.

3.2 Will there be technical drop-ins?

Yes. Technical drop-ins are expected to be made available to support API and integration questions.

Further details will be shared as part of the engagement and transition plan.

3.3 Will there be a developer portal?

Yes. ELTO intends to provide technical documentation through a developer portal as it becomes available.

This will include API documentation and supporting technical guidance.

3.4 When will full API documentation be available?

API documentation will be released in phases from July 2026.

Not all documentation or endpoints may be available at the same time. Further detail will be added iteratively as design and implementation are confirmed.

3.5 Will the webinar presentation and recording be available?

Yes. ELTO intends to make webinar material available to attendees after the session.

Details of where the presentation and recording can be accessed will be shared through the usual communication channels.

3.6 Will the slides from previous webinars be reissued?

Yes. ELTO intends to share webinar slides alongside the relevant session recording or follow-up communication.

3.7 How will ELTO share updates to documents and design decisions?

ELTO will provide regular updates as documentation and design decisions are confirmed. Updates may include revised guidance documents, developer portal updates, webinars, technical drop-ins and direct communications to nominated contacts.

3.8 Can insurers nominate additional attendees for future webinars?

Yes. Insurers can nominate additional colleagues for future webinars and engagement sessions.

This may include colleagues from policy operations, delegated authority teams, IT, data, compliance, testing, portal administration and transition planning.

3.9 Can we ask questions on the API documentation once it is released?

Yes. Questions on the documentation can be raised through the agreed ELTO communication routes. ELTO also intends to provide drop-in sessions and technical engagement opportunities to support implementation questions.

3.10 How should insurers raise issues, clarifications or risks?

Insurers should raise issues, clarifications or risks through the agreed ELTO communication routes.

ELTO will confirm the preferred contact process for:

- programme queries;
- technical questions;
- portal access questions;
- insurer-specific transition risks.

3.11 How often will ELTO provide updates?

ELTO will provide regular updates throughout the transition period.

Updates may include:

- documentation updates;
- design decisions;
- confirmed API details;
- transition guidance;
- webinar invitations;
- testing guidance;
- cutover communications.

3.12 Will insurers still have a KAU or named relationship contact?

ELTO will confirm future engagement and relationship management arrangements as part of the wider transition plan.

Existing relationship and support routes should continue to be used until any change is confirmed.

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4.1 Will existing portal usernames and passwords remain the same?

No. There will be no migration of existing usernames and passwords from the current platform to the new platform.

All users will need to register for the new platform.

4.2 Will users need multiple email addresses if they act for more than one organisation?

No. In the new platform, a single user account will be able to access multiple suppliers or organisations, subject to the correct permissions.

This means users should not need separate email addresses simply to access different insurer or delegated authority relationships.

4.3 How will users be verified and secured in the new portal?

Users with access corporate Entra / Microsoft 365 will be able to link their registration to their organisation's identity management process. MFA will be enforced by ELTO's protocols.

Users who do not have this option will be required to authenticate using a one-time passcode or standard MFA through an authenticator app.

4.4 Will one-time verification codes continue?

The new platform is expected to support one-time passcodes where required.

Further detail will be confirmed as part of portal registration and user access guidance.

4.5 Will password expiry or reset frequency change?

We are likely to be using passwordless access protocols for those not accessing via their own corporate identity. We will be providing policy details before rollout.

4.6 How many onboarding contacts should each insurer nominate?

ELTO will ask each insurer to nominate appropriate operational and technical contacts for onboarding. This should include a lead contact and relevant developer / integration contacts. Final onboarding contact requirements will be confirmed in the transition guidance.

For the purpose of accessing the initial developer portal you will be asked to provide a lead developer to access the API development credentials and up to five additional developers who will be able to access the developer portal.

4.7 What are API credentials?

API credentials are the technical access details used by a system or application to authenticate with the ELD API. They are separate from an individual user's portal login. The API is expected to use Microsoft Entra authentication, with the exact credential process confirmed in the API documentation.

4.8 Will API Credentials expire automatically?

Yes. The current position is that API credentials will expire after one year. ELTO will confirm the process for renewal, expiry reminders and credential management in the developer portal / onboarding guidance. You will also have the option of rotating your credentials to your own policies should you wish to change them sooner than 12 months.

4.9 Are API credentials the same as portal usernames and passwords?

No. Portal usernames and access are used by individual users to log into the ELD portal. API credentials are used by systems or applications to submit data through the API.

4.10 How will access work where an organisation acts as both an insurer and a delegated authority?

The new platform is intended to support a more flexible access model.

A single user may be able to access multiple organisations where they have the correct permissions. Further guidance will explain how insurer and delegated authority access will be set up and managed.

4.11 Will the portal support manual policy management?

Yes. The portal will support manual single policy management.

This includes:

- creating a single policy;
- updating a single policy;
- deleting a single policy;
- checking submission status;
- reviewing validation results.

4.12 Will the portal support bulk file upload?

No. Bulk file upload will be available through the API only.

The portal will support manual single policy submission and status checking, but not bulk policy file upload through the user interface.

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5.1 What is the new policy key?

The new policy key is based on the following fields:

- insurer;
- policy number;
- supplementary policy reference;
- cover start date;

Employer name, policy type and cover end date are no longer part of the policy key.

5.2 Is the policy key the same as the compend or composite key?

Yes. The terms compend key and composite key are both being used to describe the fields that uniquely identify a policy record. This is referred to as the policy key in the new platform.

5.3 What happens if the policyholder name changes?

Policyholder name is not part of the new policy key.

Where the policy key remains the same, a corrected or updated policyholder name should update the existing policy record rather than create a new policy.

5.4 What happens if an employer name changes?

Employer name is not part of the policy key.

The effect of an employer name change will depend on how the policy record is submitted. As policies must be supplied in full, the submitted policy should include the complete and correct list of employers that should be held against that policy.

5.5 What happens if the cover end date changes because of a mid-term cancellation?

Cover end date is no longer part of the policy key. A revised cover end date should therefore be handled as an update to the full policy record rather than a change to the policy key. ELTO will provide worked examples for mid-term cancellations in the API guidance.

5.6 Will Original Insurer name or Original Insurer ID still be referenced?

OriginalInsurerId is no longer required as a supplier-submitted field. Transfer history will be maintained internally by ELD. ELTO will confirm whether and how original insurer information will be surfaced in reporting, policy tracing or operational views.

5.7 Will the removal of Original Insurer ID affect policy tracing work?

The removal of the original insurer ID should not affect tracing. Policy history will be maintained kept within the audit logs internally. ELTO will confirm any further guidance on tracing and how to respond.

5.8 How will annual reconciliation work if the policy key is changing?

Further reconciliation guidance will be provided on how you can manage your reconciliation process.

5.9 Does the new model support multiple ERNs for one employer?

Yes. ERNs are now held as an array, allowing multiple Employer Reference Numbers to be supplied for a single employer.

5.10 Will additional ERNs be migrated automatically?

The ERN currently held on ELD will be carried over where one exists.

Additional ERNs, where held by insurers, can be supplied after migration as part of the policy submission process.

5.11 What is a CRN?

CRN means Company Registration Number. It is the unique company registration reference issued by Companies House. CRN is optional in the new ELD model and may be left blank where the insurer does not hold it.

5.12 Is CRN mandatory?

No. CRN is optional.

If an insurer does not hold CRN in its source systems, it may be left blank.

5.13 Will leaving CRN blank create an audit issue?

CRN is optional, so leaving it blank should not create a validation failure where the insurer does not hold the value.

Further audit guidance will be provided if required.

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6.1 What happens to the existing parent/child employer hierarchy?

The parent/child structure is being removed.

In the new model, a policy is represented as a single policy record containing all covered employers. All employers have equal standing within that policy record.

6.2 Will insurers still supply parent and child records as they do today?

No. The parent/child hierarchy will not be used in the new model.

Policies will be supplied as a single policy record containing all covered employers.

6.3 How will the new platform distinguish between what used to be parent and child records?

The new platform will not use the previous parent/child distinction.

Former parent and child records will be consolidated into a single policy record, with all employers held at equal standing within that policy.

6.4 How will child employer cover periods be handled?

Where an employer is not covered for the full policy period, this should be represented using the adjusted employer cover start and adjusted employer cover end fields.

6.5 Will a child employer's shorter cover period still be visible?

Yes. Where a former child employer had a different period of cover, this should be represented using the adjusted employer cover date fields in the new model.

6.6 How will ELTO know that every employer has been supplied?

Each submission for an existing policy key is treated as the complete version of that policy.

The submitting organisation must include all employers that should remain on the policy.

Missing employers may be treated as no longer part of that policy record.

6.7 How will the system avoid overwriting a parent record where the employer is actually a subsidiary?

In the new model, the old parent/subsidiary distinction is replaced by a single policy record containing multiple employers.

The full policy record must include all employers that should be covered. The system will not rely on a parent/child label to distinguish those employers.

6.8 What happens if there are multiple employers with the same company name but different addresses?

The new model allows multiple employers to be held within a single policy record, each with its own address and identifiers. The current outline only specifies duplicate policy detection. Any further employer-level duplicate checks will be confirmed in the full validation rules.

6.9 What should insurers do if they have high-volume parent/child submissions today?

Insurers with high-volume parent/child submissions should raise this as part of transition planning.

ELTO will use the testing and onboarding period to help insurers understand the impact on their file creation process and identify any implementation risks.

7 Submission Routes & File Formats

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7.1 What submission routes will be available?

There will be two API-based submission routes:

1. Direct API submission
Used for smaller submissions or cases where immediate validation feedback is required.
2. API file upload
Used for bulk submissions, scheduled data loads and existing batch processes.

The portal will also support manual single policy submission.

7.2 What is direct API submission?

Direct API submission allows one or more policies to be submitted directly in the API request body.

Validation is synchronous and all-or-nothing. If any policy in the request fails validation, the full direct submission is rejected.

7.3 What is API file upload?

API file upload allows a supplier to request a secure upload URL, upload a file to that URL and then track processing using the status endpoint or ELD policy management area.

File processing is asynchronous. Valid policies are accepted and invalid policies are rejected individually.

7.4 What file formats will be supported?

For file-based submissions, the new system supports:

- JSON;
- pipe-delimited text.

JSON is recommended for new integrations. Pipe-delimited text is intended to support organisations whose source data is held in spreadsheet or batch formats.

7.5 Is the new text file a CSV file?

No. The text file is pipe-delimited rather than comma-separated.

It may be produced from spreadsheet tools, but it must follow the expected pipe-delimited structure and column order.

7.6 What happens if a field contains a pipe character?

The pipe character is used as the field separator in the text file format.

If a field value itself contains a pipe character, the whole field must be enclosed in double quotes. This prevents the pipe character from being treated as a field separator.

For example: Employer name: Employer | Trading Ltd should be supplied as: "Employer | Trading Ltd"

If a field contains double quotes, each double quote must be doubled.

For example: Employer "North" Ltd should be supplied as: "Employer ""North"" Ltd"

7.7 Will there be maximum field lengths?

Maximum field lengths and final validation rules will be confirmed in the full API documentation.

7.8 Can insurers still submit single policies through the portal?

Yes. The portal will support single policy submission, including create/update and delete actions.

The portal will also support status checking and validation result review.

7.9 Can insurers upload bulk files through the portal?

No. Bulk file upload will be available through the API only.

The ELD portal user interface will not support bulk policy file upload.

7.10 How should smaller batches be submitted if the portal does not support file upload?

Smaller batches that are too large for manual portal entry should be submitted through the API routes.

Insurers should consider whether direct API submission or API file upload is more appropriate depending on the size and frequency of the batch.

7.11 Can deletes be submitted by file?

Yes. File-based DELETE submissions will be supported.

File-based DELETE submissions follow the same per-record processing approach as file-based UPSERT submissions. Valid delete records are processed, while invalid delete records are rejected individually.

7.12 Can the portal be used for single policy deletes?

Yes. The portal will support manual single policy create, update and delete actions. Bulk file upload will be API only.

7.13 Will there be a GET API to retrieve ELD policy details?

A GET API for retrieving policy details is not included in the current outline specification. The current API outline focuses on policy submission, file upload, delete and submission status. ELTO will confirm whether any policy retrieval API will be included in a future release.

7.14 Can a policy be partially updated?

No. Policies must be supplied in full.

Where a policy with the same policy key already exists, the newly accepted policy submission replaces the previous version of that policy once ingestion is complete.

8 Validation, Errors and Submission Status

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8.1 How does validation work for direct API submissions?

For direct API submissions, validation is synchronous and all-or-nothing.

If any policy in the submission fails validation, the full direct submission is rejected and no policies in that submission are accepted or queued.

8.2 How does validation work for file uploads?

For file uploads, validation is asynchronous and processed per policy.

Valid policies are accepted and invalid policies are rejected individually. There is no minimum pass rate.

8.3 If one employer fails validation, does the rest of the policy still load?

A policy is treated as a whole policy record.

For direct API submissions, if any policy in the request fails validation, the full direct submission is rejected.

For file uploads, validation is per policy. Valid policies are accepted and invalid policies are rejected individually. However, an individual policy is not treated as separate parent and child transactions.

8.4 What happens if the file itself is invalid?

If the file itself cannot be processed, the file may be rejected in full.

Examples include:

- malformed JSON;
- unparseable pipe-delimited text;
- missing or incorrect header row;
- incorrect column count.

Where the file is rejected in full, no policies in that file are processed.

8.5 How will validation errors be returned?

For direct API submissions, validation errors are returned immediately in the API response.

For file uploads, validation results are available after processing through:

- the API status endpoint;
- the ELD policy management area.

8.6 How will submission status be monitored?

Submission status can be retrieved using the API status endpoint.

The ELD portal will also provide visibility of upload status and validation results.

8.7 Will insurers receive a return file listing failed transactions?

The system is not expected to issue a separate return file after processing.

For file-based submissions, validation results are retrieved using the status endpoint or viewed in the ELD policy management area.

ELTO will confirm whether validation results can also be exported or downloaded from the portal.

8.8 Will validation errors include enough information to identify the failed record?

The status response is expected to provide enough detail for the submitting organisation to identify the affected record.

This may include:

- policy key;
- employer name;
- policy index (as part of the path);
- employer index (as part of the path);
- field path;
- error description;
- row number for pipe-delimited text files where applicable.

8.9 What status values will be used?

The status endpoint will indicate the processing state of a submission.

Expected statuses include:

- waiting for file;
- queued;
- processing;
- complete;
- rejected;
- system error.

The final status values and descriptions will be confirmed in the API documentation.

8.10 Does the status endpoint confirm how many policies were actually deleted?

For DELETE submissions, the status response is expected to confirm whether delete records were valid for processing. It will not confirm how many matching existing policies were actually deleted. Any required confirmation should be validated through reporting or policy search.

8.11 What happens if a DELETE request refers to a policy that does not exist?

To be confirmed in final API guidance. If correctly formatted then the request will be processed. See question 8.10 above.

8.12 What does “accepted and queued” mean?

“Accepted and queued” means the submission has passed the relevant initial checks and has been recorded for processing by the ELD platform.

It does not mean the policy change will be immediately visible in all ELD features.

There may be a short delay before changes appear in policy search, reporting, extracts or downstream ELD functions.

8.13 Where can results be viewed after a file upload?

After a file has been uploaded and processing has started, results can be retrieved in either of two ways:

- by polling the API status endpoint using the upload ID;
- by viewing the upload status and validation results in the ELD policy management area.

8.14 Can validation results be downloaded from the portal?

Validation results can be viewed through the status endpoint and ELD policy management area. ELTO will confirm whether downloadable/exportable validation results will be available.

8.15 Will ELTO share the field-level validations used in the new processing flow?

Yes. Indicative validation rules are included in the API Outline Specification, and the full validation rule set will be confirmed in the full API documentation. Validation errors will identify the affected field or item using a structured path and human-readable description.

8.16 When a file upload is processed, are errors reported at file level or record level?

Both can occur. If the file itself is invalid, for example malformed JSON or an invalid pipe-delimited structure, the file may be rejected in full. If the file is structurally valid, validation is processed per policy: valid policies are accepted and invalid policies are rejected individually.

8.17 When the documentation says valid policies are accepted and invalid ones rejected, does this mean files or records?

For file upload, the file is first checked to make sure it can be processed. Once the file is accepted for processing, validation is applied at policy-record level. Valid policy records are processed and invalid policy records are rejected individually.

8.18 How will everyday policy scenarios be handled?

The following are common scenarios and expected handling.

Scenario	What happens
Policyholder name correction	If the policy key stays the same, the corrected name updates the existing policy record.
Mid-term cancellation	Because cover end date is not part of the policy key. A revised cover date should be handled as an update to the full policy record.
Adding / removing an employer	Re-submit the full policy record with the complete employer list. The new version replaces the

Scenario**What happens**

Failed file policy

previous one. If adding an employer later or removing one earlier, but they still have a period of cover then the adjusted cover dates should be updated.

For file uploads, valid policies are accepted and invalid policies are rejected individually. Errors are viewed via the status endpoint or ELD portal.

9 Testing, Reporting and Ongoing Operations

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9.1 Will test endpoints be available?

Yes. Test endpoints are planned.

They will behave like the live endpoints, including validation, but will not ingest data into the live ELD.

9.2 When will test endpoints be available?

Test endpoints are expected to become available in phases from July 2026.

The first endpoints available may not represent the full final API. Further endpoints and functionality will be added as the programme progresses.

9.3 Which test endpoints will be available first?

Test endpoints will be released in phases from July 2026. ELTO will confirm which endpoints are available in each release and how insurers can access them.

9.4 What testing will members be expected to complete?

The detailed testing approach will be confirmed.

Testing is expected to cover the relevant submission route, such as:

- direct API submission;
- API file upload;
- validation handling;
- status checking;
- portal access and user administration;
- single policy submission through the portal where applicable.

9.5 Will ELTO issue testing scenarios?

ELTO is expected to provide guidance to support testing.

This should include the areas members need to test and the expected outcomes, particularly for submission, validation, status checking and portal access.

9.6 Will there be a UAT sign-off date?

The UAT sign-off date has not yet been confirmed.

ELTO will provide this as part of the detailed transition plan.

9.7 Will insurers be able to run their own reports?

Further information will be provided on reporting capability.

The new platform is expected to improve visibility of submissions, status and validation outcomes, but the full reporting approach will be confirmed in future guidance.

9.8 Will website search functionality for policyholders change?

Further information will be provided on policyholder-facing search functionality.

ELTO will confirm whether the new platform includes changes to public search capability, including any improved search or matching functionality.

9.9 Will the changes affect how ELTO makes regular policy tracing requests to members?

This is not expected to be the main focus of the policy submission change.

ELTO will confirm whether any operational changes will affect policy tracing requests or member responses.

9.10 What hypercare support will ELTO provide after go-live?

ELTO will provide post-go-live support as part of the transition.

Details of the hypercare period, support channels, response arrangements and escalation routes will be confirmed in the transition plan.

9.11 How will ELTO support members during the January–March period, given audit and regulatory activity?

ELTO recognises that January to March is a busy period for validation, audit and regulatory activity. The detailed transition plan will set out cutover timing, testing expectations, support arrangements and any hypercare activity so that insurers can plan appropriately. Insurers should raise any specific transition risks as early as possible.

9.12 Will policy tracing requests be affected by these changes?

No. ELTO will be transitioning and migrating all tracing cases from the current platform to the new platform. Further guidance will be provided in transition planning.

9.13 Will insurers be able to run reports to validate changes?

Further reporting guidance will be provided along with how you will be able to validate all changes.

9.14 What should insurers do now?

Insurers should:

- review the ELD NextGen guidance documents;
- identify current SFTP feeds and batch jobs;
- decide which submission routes are likely to be used;
- identify who will own API integration;
- identify portal users;
- confirm technical and operational contacts;
- review delegated authority arrangements;
- prepare for onboarding and testing;
- raise any transition risks with ELTO as early as possible.