

Technical Guidelines for the Preparation and Submission of ESEF Annual Financial Reports to the FCA

v2.0

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1 Introduction

1.1 Background

The FCA has upgraded the National Storage Mechanism (NSM) to allow issuers to submit ESEF-prepared Annual Financial Reports (AFRs). For more information on ESEF please see our [website](#).

1.2 Purpose

ESMA has prepared an [ESEF reporting manual](#) to provide guidance on common issues encountered when preparing Inline XBRL instance documents. The FCA requires issuers preparing AFRs for submission to have regards to the ESEF reporting manual, save for a small number of specific departures necessitated by the design of the FCA's systems. This document highlights those specific requirements in Section 2.

This document applies to any iXBRL (Inline XBRL) submission to the NSM including, but not limited to, iXBRL submissions prepared using ESMA's ESEF taxonomy. Where no specific guidance is provided, XBRL specifications must be followed.

This document is fully aligned with the technical rules and constraints defined in all referenced XBRL technical specifications. We note that ESMA has, in some cases, been more restrictive and precise in addressing the specifics of the ESEF format.

For clarity, the FCA expects all submissions using the ESEF taxonomy to be fully compliant with those restrictions and any specific validations introduced and documented by ESMA in the ESEF reporting manual. The FCA will validate XBRL submissions according to the following specifications:

- XBRL 2.1
- Dimensions 1.0
- Inline XBRL 1.1 (including Transformation Registries)
- Formula 1.0
- Extensible Enumerations 1.0 and 2.0
- Unit Registry
- Report Packages 1.0 (or newer)

Section 3 of this document summarises the submission journey including the responses expected to be received by the submitter depending on the results of the checks and validations.

This document covers issues that are intended for a technical audience and assumes the reader has a working knowledge of relevant technical issues. Issuers may need to seek professional advice or support where necessary.

2 FCA Preparation Requirements

2.1 Report formats

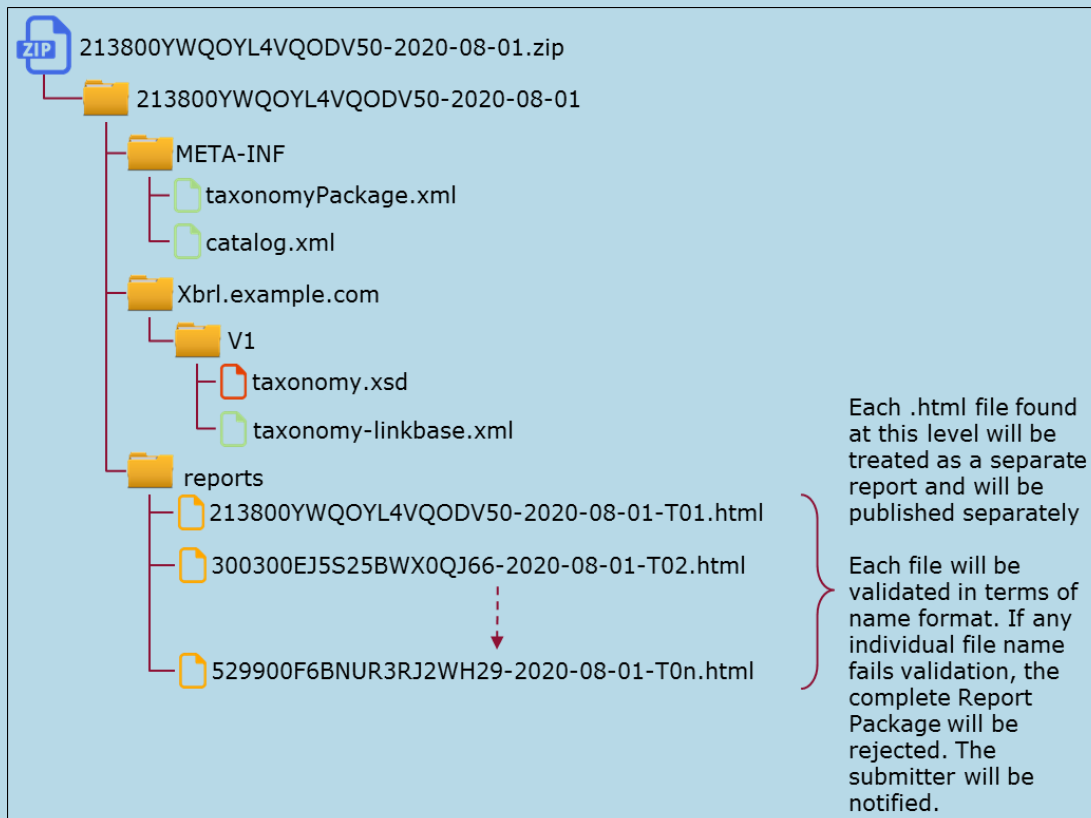
The FCA NSM will only be accepting ESEF-prepared AFRs in the following formats:

- a. AFRs prepared and filed as an XHTML document
 - This will be a document marked up using standard XHTML tags and must have a '.html' file extension. The exact file name is subject to a specific format laid out in Section 2.2.
 - The document shall not contain any iXBRL tags and therefore does not conform to any XBRL Taxonomy.
- b. AFRs prepared and marked up in a report package (*.zip)
 - The report package will include Inline XBRL file(s).
 - The iXBRL files within the package will be marked up with the ESMA ESEF taxonomy and/or other taxonomies.

2.2 Structure and naming conventions

The FCA requires iXBRL AFRs are submitted in accordance with the [XBRL International Consortium Working Group Note](#) with some exceptions as detailed in this section. An example of how these conventions must be used is provided in the box below.

Worked Example: reporting package structure and file names for a firm with an LEI of 213800YWQOYL4VQODV50 and an accounting reference date of 1 August 2020.



The FCA requires issuers follow the recommendations of the XBRL International Working Group Note, which indicates how Inline XBRL documents should be included within a report package, with the following exceptions:

Inline XBRL document file extensions in report packages

FCA requirement:

The Working Group Note specification allows a report to be submitted as XBRL (.xbrl) and/or iXBRL (.html). The FCA is mandating the use of the iXBRL version only and will not process the XBRL version. If no iXBRL report is provided an error will be returned and the report not published.

Including multiple Inline XBRL documents and multiple Inline XBRL document sets in report packages

The XBRL International Working Group Note states:

Multiple .html (or .xbrl) files within the reports directory will be considered to be separate reports.

Multiple .html files within a subdirectory of the reports directory will be treated as a single Inline XBRL Document Set.

Multiple Inline XBRL Document Sets can be provided by including multiple subdirectories of the reports directory.

FCA requirement:

Multiple reports will be allowed within the reports directory and will be considered separate reports.

- Each report must conform to the Inline XBRL (iXBRL) specification (.html).
- Each report will be validated and published as a separate entry on the NSM.
- Any report that fails validation will cause the whole report package to be rejected without publication.

We will not allow the use of subdirectories. Any report packages containing subdirectories in the reports directory will result in the submission being rejected.

Use of Images and Executable Content in Inline XBRL documents

As the inclusion of executable code is a potential threat and may cause security issues, the FCA requires submitters to ensure that all resources embedded or referenced by the XHTML document and its Inline XBRL have been inspected for inclusion of malicious content.

FCA requirement:

Script-based inline XBRL viewers must not be included either as part of Inline XBRL documents or as a separate resource.

The FCA will accept images in the XHTML document provided they are only used for content such as branding information, graphical layout or photographs.

FCA requirement:

If images need to be provided, they must be included in the XHTML document as a base64 encoded string. They must not be contained in separate files in the package. Images embedded in the XHTML document as a base64 encoded string must have the correct MIME type specified.

FCA requirement:

Submitters shall not embed images carrying financial information in the Inline XBRL document. Images should only be used for content such as branding information, graphical layout or photographs.

Use of Cascading Style Sheet (CSS) language to style Inline XBRL documents

CSS may be used to format the reports. However, the transformations need to be used appropriately (for example, they should not be used to hide information by making it not visible). Moreover, it is recommended to apply styles globally, rather than define them separately for each part of the report.

In order to limit the number of files submitted and encourage the reuse of styles in case of multiple Inline XBRL document submitters must ensure:

- Where a single Inline XBRL document is provided, the CSS must be embedded within the document.
- Where multiple Inline XBRL documents are provided (in the reports directory), the CSS must be defined in a separate file. The CSS file should be co-located in the 'reports' directory with the XBRL documents.

Naming conventions for report packages and files

Reporting files, report packages and files contained in report packages must follow predefined naming conventions to facilitate the processing of issuers' reports by end-users.

The FCA requires that all submitters comply with the following naming conventions otherwise the entire submission will be rejected.

Single HTML file without XBRL tags

FCA Requirement:

The FCA requires issuers to adopt a naming convention which match {base}-{date}-T01.html, whereby:

- The {base} component of the filename shall indicate the LEI of the issuer
- The {date} component of the filename should indicate the accounting reference date. The {date} component should follow the YYYY-MM-DD format.
- -T01 reflecting a single file

E.g. 213800YWQOYL4VQODV50-2020-08-01-T01.html

Report package

FCA Requirement:

The FCA requires issuers to adopt a naming convention which match {base}-{date}.zip, whereby:

- The {base} component of the filename shall indicate the LEI of the issuer
- The {date} component of the filename should indicate the accounting reference date. The {date} component should follow the YYYY-MM-DD format.

E.g. 213800YWQOYL4VQODV50-2020-08-01.zip

Single or multiple HTML files within a report package

FCA Requirement:

Where a report package contains one or more AFR in HTML format each report shall follow the naming convention specified above with addition of an extension denoting the report number in the set. This allows reports using different taxonomies to be submitted in a single report package. The extension must be in the following format:

{base}-{date}-{Tnn}.html.

For example:

213800YWQOYL4VQODV50-2020-08-01-T01.html

300300EJ5S25BWX0QJ66-2020-08-01-T02.html

Other files within a report package

FCA Requirement:

Any other file present (e.g. css files) in a report package must have a filename that does NOT include the use of spaces in the name.

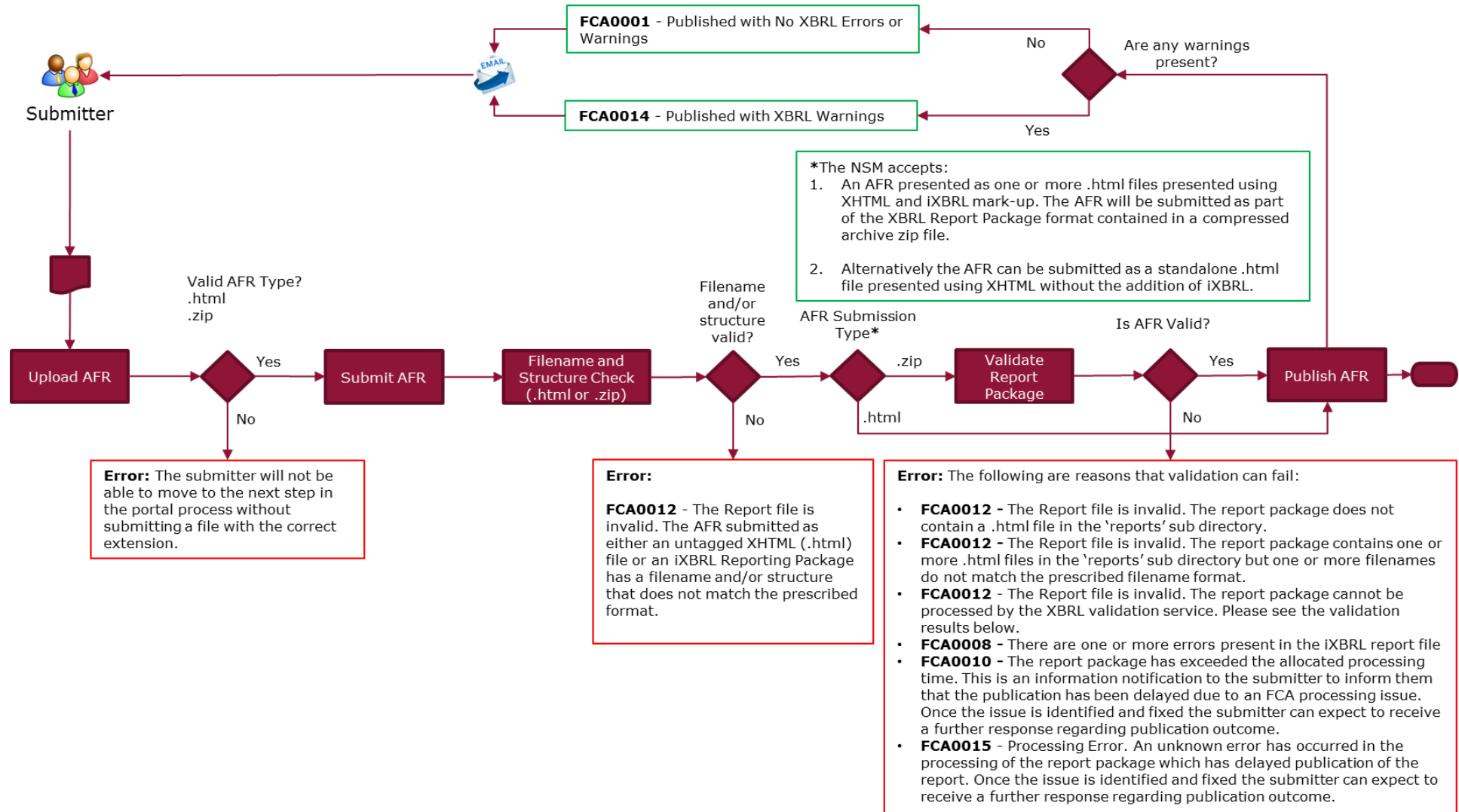
2.3 Filename validations

When an AFR (.html or .zip) is submitted to the FCA NSM the filename will be validated using the following rules. Any file or package that fails validation will be rejected. The rules defined below are a precursor applied by the FCA before any Taxonomy-defined rules are applied.

Validation Rule	Validation
<p>The report package filename must be in the correct format</p> <p>{base}-{date}.zip</p>	<p>This will be validated using the following regular expression mask:</p> <p><code>([0-9A-Z]{18}[0-9]{2})-(20[0-9]{2})-(0[1-9] 1[012])-(0[0-9] [12][0-9] [3][01]).zip</code></p> <p>Online Regex tester - https://regex101.com/</p>
<p>The structure of the report package must match that defined in this document</p>	<p>This will validate that the reports directory contains NO subdirectories. It will additionally validate that at least one .html file is present as required by a valid report package.</p>
<p>All html files forming part of a multiple Inline XBRL document set must have a filename in the correct format</p> <p>{base}-{date}-{Tnn}.html</p>	<p>This will be validated using the following regular expression mask:</p> <p><code>([0-9A-Z]{18}[0-9]{2})-(20[0-9]{2})-(0[1-9] 1[012])-(0[0-9] [12][0-9] [3][01])-T([0-9][0-9]).html</code></p> <p>Online Regex tester - https://regex101.com/</p>
<p>The LEI in the filename must be a valid LEI</p>	<p>The LEI checksum will be calculated and compared to the last 2 digits ([0-9]{2}) of the LEI in the filename. This will confirm that the supplied LEI is a valid LEI. It does not provide any information on the issued status of that LEI.</p> <p>Check digits are described in the ISO 17442 standard.</p>
<p>The accounting reference date in the .zip or .html file filename must match the date specified on the associated ESS case</p>	<p>Compares the accounting reference date in the filename with the 'document date' input on the ESS case.</p>

3 The Document Submission Process

The following flow diagram provides a high-level view of the journey when submitting ESEF-prepared AFRs to the FCA NSM. The submitter can expect to receive several responses during the submission process on the ESS portal and by email.



3.1 Status Messages

At completion of the submission process the submitter will receive a response. That response will confirm the publication or not of the submitted report.

The submitter can expect to receive the following general notifications from the FCA NSM when submitting iXBRL documents:

1. Published successfully
2. Published successfully, warnings were reported as part of the XBRL Taxonomy process
3. Not Published, one or more errors occurred

Should an error occur that prevents the submission of the iXBRL report to the validation engine or, one or more XBRL Taxonomy errors and/or warnings are detected by the iXBRL validation engine, the response notification will contain a link to the validation report XML file.

If a submission is rejected, it will need to be resubmitted with any errors corrected.

The following table defines the FCA summary status codes, messages, and descriptions that will be returned in the header of the XML validation file.

NSMStatusCode	NSMStatusMessage	NSMStatusDescription
FCA0001	Published with No XBRL Errors or Warnings	Not Applicable
FCA0014	Published with XBRL warnings ¹	The XBRL engine has responded with one or more warnings against the iXBRL report(s). Please see the validation results at the link below.
FCA0012	The Report file is invalid	The AFR submitted as either an untagged XHTML (.html) file or an iXBRL Reporting Package has a filename and/or package structure that does not match the prescribed format.

¹ When a warning is received it should be considered a possible error. We recommend these are investigated to increase the quality of the report and avoid any potential issues in relation to future submissions.

NSMStatusCode	NSMStatusMessage	NSMStatusDescription
FCA0012	The Report file is invalid	The report package does not contain a .html file in the 'reports' sub directory.
FCA0012	The Report file is invalid	The report package contains one or more .html files in the 'reports' sub directory but one or more filenames do not match the prescribed filename format.
FCA0012	The Report file is invalid	The report package cannot be processed by the XBRL validation service. Please see the validation results at the link below.
FCA0008	There are one or more errors present in the iXBRL report file	Please see the validation results at the link below.
FCA0010	The report package has exceeded the allocated processing time.	This is an information notification to the submitter to inform them that the publication has been delayed due to an FCA processing issue. Once the issue is identified and fixed the submitter can expect to receive a further response regarding publication outcome.

Appendix A. FCA iXBRL Response Schema

Below is the schema defined in the 'fca_nsm_response.xsd'. The schema file is embedded below definition.

```
<?xml version="1.0" encoding="UTF-8"?>
<xs:schema xmlns:xs="http://www.w3.org/2001/XMLSchema"
  xmlns:tns="http://www.fca.org.uk/NSMresponse"
  targetNamespace="http://www.fca.org.uk/NSMresponse">

  <xs:complexType name="NSM_Processing_Result">
    <xs:sequence>
      <xs:element minOccurs="1" maxOccurs="1" name="NSMStatusHeader" type="tns:NSM_Status_Header"/>
      <xs:element minOccurs="0" name="XBRLValidationResults" type="tns:XBRL_Validation_Results"/>
    </xs:sequence>
    <xs:attribute name="version" type="xs:positiveInteger" use="optional" default="1">
      <xs:annotation>
        <xs:documentation>The version of the Item. </xs:documentation>
      </xs:annotation>
    </xs:attribute>
  </xs:complexType>

  <xs:element name="NSMProcessingResult" type="tns:NSM_Processing_Result"/>

  <xs:complexType name="NSM_Status_Header">
    <xs:sequence>
      <xs:element minOccurs="1" maxOccurs="1" name="NSMStatusCode" type="tns:NSM_Status_Code"/>
      <xs:element minOccurs="1" maxOccurs="1" name="NSMStatusMessage" type="tns:String255"/>
      <xs:element minOccurs="0" maxOccurs="1" name="NSMStatusDescription" type="tns:String1024"/>
    </xs:sequence>
  </xs:complexType>

  <xs:complexType name="XBRL_Validation_Results">
    <xs:sequence>
      <xs:element minOccurs="0" name="TaxonomyVersionEntryPoints" nillable="true"
type="tns:ArrayOfTaxonomyVersionEntryPoint"/>
      <xs:element minOccurs="0" name="TaxonomyVersionIds" nillable="true"
type="tns:ArrayOfTaxonomyVersionId"/>
      <xs:element minOccurs="0" name="ValidationResults" nillable="true"
type="tns:ArrayOfValidationResult"/>
    </xs:sequence>
  </xs:complexType>

  <xs:simpleType name="NSM_Status_Code">
    <xs:restriction base="xs:string">
      <xs:pattern value="FCA(0|[1-9]){4}"/>
    </xs:restriction>
  </xs:simpleType>

  <xs:simpleType name="String255">
    <xs:restriction base="xs:string">
      <xs:maxLength value="255"/>
    </xs:restriction>
  </xs:simpleType>

  <xs:simpleType name="String1024">
    <xs:restriction base="xs:string">
      <xs:maxLength value="1024"/>
    </xs:restriction>
  </xs:simpleType>

  <xs:simpleType name="PublishStatus">
    <xs:restriction base="xs:string">
      <xs:enumeration value="Published"/>
      <xs:enumeration value="Published with Warnings"/>
      <xs:enumeration value="Not Published - Errors"/>
      <xs:enumeration value="Not Published - Information"/>
    </xs:restriction>
  </xs:simpleType>

```

```

<xs:complexType name="ArrayOfTaxonomyVersionEntryPoint">
  <xs:sequence>
    <xs:element minOccurs="0" maxOccurs="unbounded" name="TaxonomyVersionEntryPoint" nillable="true"
type="tns:TaxonomyVersionEntryPoint"/>
  </xs:sequence>
</xs:complexType>
<xs:element name="ArrayOfTaxonomyVersionEntryPoint" nillable="true"
type="tns:ArrayOfTaxonomyVersionEntryPoint"/>
<xs:complexType name="TaxonomyVersionEntryPoint">
  <xs:sequence>
    <xs:element minOccurs="0" name="Value" nillable="true" type="xs:string"/>
  </xs:sequence>
</xs:complexType>
<xs:element name="TaxonomyVersionEntryPoint" nillable="true" type="tns:TaxonomyVersionEntryPoint"/>
<xs:complexType name="ArrayOfTaxonomyVersionId">
  <xs:sequence>
    <xs:element minOccurs="0" maxOccurs="unbounded" name="TaxonomyVersionId" nillable="true"
type="tns:TaxonomyVersionId"/>
  </xs:sequence>
</xs:complexType>
<xs:element name="ArrayOfTaxonomyVersionId" nillable="true" type="tns:ArrayOfTaxonomyVersionId"/>
<xs:complexType name="TaxonomyVersionId">
  <xs:sequence>
    <xs:element minOccurs="0" name="Value" type="xs:int"/>
  </xs:sequence>
</xs:complexType>
<xs:element name="TaxonomyVersionId" nillable="true" type="tns:TaxonomyVersionId"/>
<xs:complexType name="ArrayOfValidationResult">
  <xs:sequence>
    <xs:element minOccurs="0" maxOccurs="unbounded" name="ValidationResult" nillable="true"
type="tns:ValidationResult"/>
  </xs:sequence>
</xs:complexType>
<xs:element name="ArrayOfValidationResult" nillable="true" type="tns:ArrayOfValidationResult"/>
<xs:complexType name="ValidationResult">
  <xs:sequence>
    <xs:element minOccurs="0" name="Id" nillable="true" type="xs:string"/>
    <xs:element minOccurs="0" name="Message" nillable="true" type="xs:string"/>
    <xs:element minOccurs="0" name="Severity" type="xs:string"/>
    <xs:element minOccurs="0" name="Type" type="xs:string"/>
    <xs:element minOccurs="0" name="ErrorType" type="xs:string"/>
    <xs:element minOccurs="0" name="ErrorSubType" type="xs:string"/>
  </xs:sequence>
</xs:complexType>
</xs:schema>

```

Schema file:

[fca_nsm_response.xsd](#)