

# **Technical Guidelines for the Preparation and Submission of Structured Annual Financial Reports to the FCA**

V9.0

March 2025

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## **V9.0 updates:**

- Changes to reflect the implementation of the 2024 ESEF Reporting Manual and the associated 2024 ESEF XBRL taxonomy.

## **v8.0 updates:**

- Change to clarify report package options (section 2.3f.ii)

## **v7.0 updates:**

- Change to reflect updated ESEF and UKSEF reporting manuals
- Change to reference implementation of Calcs V1.1
- Changes to reflect acceptance of .xbri extension report packages.

## **v6.0 updates:**

- Update on 100MB limit of file size permitted by FCA system (section 2.3(d))
- Clarification on use of http / https in taxonomy entry points (section 3.2).

## **v5.0 updates:**

- Confirmation of removal of mandatory tags checks and update of UKSEF validations (section 1.1(a)).

# 1 Introduction

## 1.1 Background

The FCA's National Storage Mechanism (NSM) allows issuers to submit an untagged or tagged structured Annual Financial Report (AFR). For more information please see our [website](#) which contains links to various other useful documents including the [NSM submitter user guide](#).

The FCA's system has been set up with reference to guidance from XBRL International and taxonomy-issuing bodies.

### a) Tagged reports

The FCA's system is aligned with the guidance set out in v1.0 of the [XBRL International Consortium Report Package Specification](#) on including XBRL Reports in Taxonomy Packages (22 Sept 2023).

The system validates calculation relationships in accordance with the XBRL 1.1 [specification](#).

We have also aligned our system with guidelines provided by the taxonomy issuing bodies (see section 3.2 for an overview of the taxonomies the system is set up to accept):

#### i. **ESEF (European Single Electronic Format)**

For issuers using an **ESEF taxonomy**, the guidelines are set out in the [ESEF reporting manual](#). Our system is set up to reflect the July 2024 version for all filings using an ESEF taxonomy, regardless of the issuer's reporting period.

In line with the 2023 ESEF conformance suite, the system will not be checking whether the specified mandatory text block tags are present (TD ESEF Annex II).



## Text block tagging

The FCA expects issuers to take reasonable care when applying text block tags. We are aware that market participants have raised questions about the application of the manual to text block tagging, in particular the use of multi-tagging (see section 1.9 of the ESEF manual). We recognise that this approach may be complex and accept that issuers will need to use judgement in tagging, taking into account the structure of their report and how the tagged information may be used.

As highlighted in the ESEF manual (section 2.2.7), we also recognise that there are current technical limitations, which mean that extracted text block tags may not exactly mirror the formatted human-readable notes. Our system has been updated to reflect ESMA's revised guidance.

We will take these complexities into account in our review work when assessing the quality of submissions.

## ii. UKSEF

For issuers using **UKSEF**, the system reflects the ESEF reporting manual, modified as set out in the [UKSEF XBRL Tagging Guide](#) published by the Financial Reporting Council. Unless otherwise indicated, we do not require the information mandated by Companies House.

We have updated the validations for filings that use a UKSEF Taxonomy to reflect the latest ESEF manual and the TD ESEF regulation.

The system has also been updated to accept filings that use the UKSEF approach. The UKSEF approach uses 'multiple XBRL target documents' (see the UKSEF XBRL tagging guide and the [UKSEF Developer's guide](#)). For UKSEF reports, the FCA system will only validate the default target document against the ESEF filing rules. No filing rule validations are applied to the UKFRS target document. **This means that a UKSEF report that passes the FCA's validations may fail when submitted to another regulator or XBRL processor.**

Any questions related to the UKSEF approach and guides should be directed to the Financial Reporting Council.

## b) Untagged reports

For untagged reports, we have implemented the relevant guidelines from the July 2024 version of the [ESEF reporting manual](#).

## 1.2 Purpose of this document

There are some specific requirements necessitated by the design of the FCA's systems which are in addition to or take precedence over the XBRL report package specification and the guidelines referred to in section 1.1. This document highlights those specific requirements in Section 2.

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.

Anyone intending to submit a structured AFR to the FCA **should read and follow the [NSM submitter user guide](#) as well as the guidelines in this note beforehand to avoid rejected submissions.**

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

## 2 FCA Preparation Requirements

The FCA's system requires submitters meet the requirements in this section, otherwise submissions may be rejected.

### 2.1 Report formats

#### 2.1 Report format requirement:

A structured AFR must be submitted in one of the two following formats:

- a. An untagged AFR prepared in an XHTML format
  - This will be a document marked up using standard XHTML tags and have a '.html' file or '.xhtml' extension **only**.
  - The document will not contain any iXBRL tags and therefore not conform to any XBRL taxonomy.
  - The document must be submitted as single stand-alone, unzipped XHTML file.
  - The document must use UTF-8 character encoding.
- b. A tagged AFR prepared in a zipped report package (\*.zip or \*.xbri extension only)
  - The report package will include one report which must be XHTML tagged using the iXBRL format with a '.html' or '.xhtml' file extension **only**.
  - The report package will be structured as set out in the XBRL International Consortium Report Package Specification, including the use of the relevant supporting files.
  - The iXBRL file within the package will be marked up using an appropriate taxonomy (extended or supplemented at the issuer's option).
  - The document must use UTF-8 character encoding.

Issuers should refer to the [FCA rules](#) in terms of which of these formats they must use.

## 2.2 Specific structure and naming conventions

### a) Report format

The XBRL report package specification permits various report formats. The FCA only accepts the following format:

#### **2.2a iXBRL requirement:**

The report format must be inline XBRL only.

### b) Including multiple iXBRL documents and multiple iXBRL document sets in report packages

The XBRL report specification allows for multiple reports. The FCA requirement does not permit this:

#### **2.2b Multiple report requirement:**

Only a single report must be submitted within the reports directory.

There must not be any subdirectories.

### c) Use of Executable Content in iXBRL 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 iXBRL have been inspected for inclusion of malicious content.

#### **2.2c Executable content requirement:**

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

### d) Use of images

The FCA accepts images in accordance with the following requirements:

#### **2.2d.i Untagged report image requirement:**

For untagged files, images must be included in the XHTML document as a base64 encoded string.

#### **2.2d.ii Tagged report image requirement:**

For tagged files, images can be provided either in the XHTML document as a base64 encoded string or be referenced as separate files in the package. The use of these two methods must not be combined.

#### **2.2d.iii Image format requirement:**

If images are contained in separate files in the package, they must be in PNG, GIF, SVG or JPG/JPEG format. All the external referenced images must be placed in the same location within the zip/xbri package.

### e) Use of Cascading Style Sheet (CSS) language and fonts

#### **2.2e Embedded file requirement:**

In order to limit the number of files, submitters must ensure the CSS and fonts are embedded within the document.



## f) Naming conventions for report packages and files

Reporting files, report packages and the file contained in report packages must follow predefined naming conventions to facilitate the processing of issuers' reports by end-users. A summary is provided below, followed by more detailed requirements.

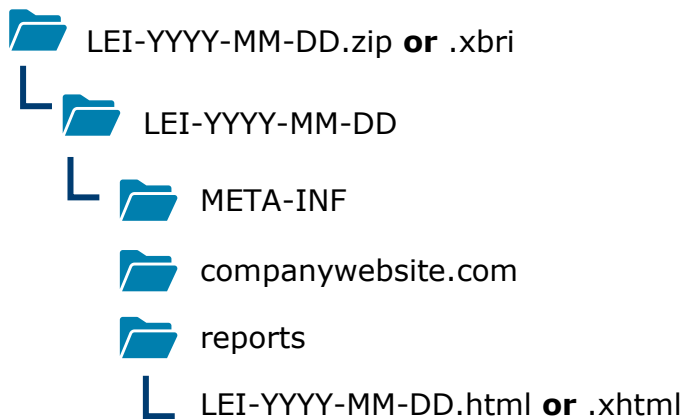
### 2.2f File structure and naming requirement

#### Untagged report

LEI-YYYY-MM-DD.html **or** .xhtml

LEI and date will be checked against the ESS case

#### Tagged report



**Do not create additional folder levels**

'reports' folder must contain only one .html or .xhtml file and **no subfolders**

Note: .xbri packages **must** have a reportPackage.json file in the META-INF subfolder. This **is optional** for a .zip package. Where this file is provided, it **must** include a document type URI of <https://xbrl.org/report-package/2023/xbri> or <https://xbrl.org/report-package/CR/2023-05-03/xbri>

i. **Single untagged xHTML file**

**2.2f.i Single untagged file name requirement:**

For single xHTML files without tags, issuers must adopt a naming convention which matches {base}-{date}.html or .xhtml, whereby:

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

E.g. 213800YWQOYL4VQODV50-2022-12-31.html

ii. **Tagged file – Report package**

**2.2f.ii Report package name requirement:**

For a report package, issuers must adopt a naming convention which matches {base}-{date}.zip or {base}-{date}.xbri, whereby:

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

E.g. 213800YWQOYL4VQODV50-2022-12-31.zip

213800YWQOYL4VQODV50-2022-12-31.xbri

### iii. **Tagged file – xHTML file within report package**

#### **2.2f.iii Report file naming requirement:**

For a tagged xHTML file within a report package, issuers must adopt a naming convention which matches {base}-{date}.html or .xhtml whereby:

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

E.g. 213800YWQOYL4VQODV50-2022-12-31.html

Note: previously the filename was required to end in 'T01' – this is no longer required but is still allowed.

### iv. **Other files within a report package**

#### **2.2f.iv Other file requirement:**

Any other file present in a report package must have a filename that does NOT include spaces.

## **2.3 Other FCA preparation requirements**

### a) File protection

#### **2.3a File protection requirement:**

All files delivered must be unencrypted and not be protected by passwords.

## b) Language

### **2.3b requirement:**

In accordance with DTR 6.2.4, regulated information must be disclosed in English. An issuer must not file structured AFRs in other languages.

## c) Tagging of dashes

[Deleted]

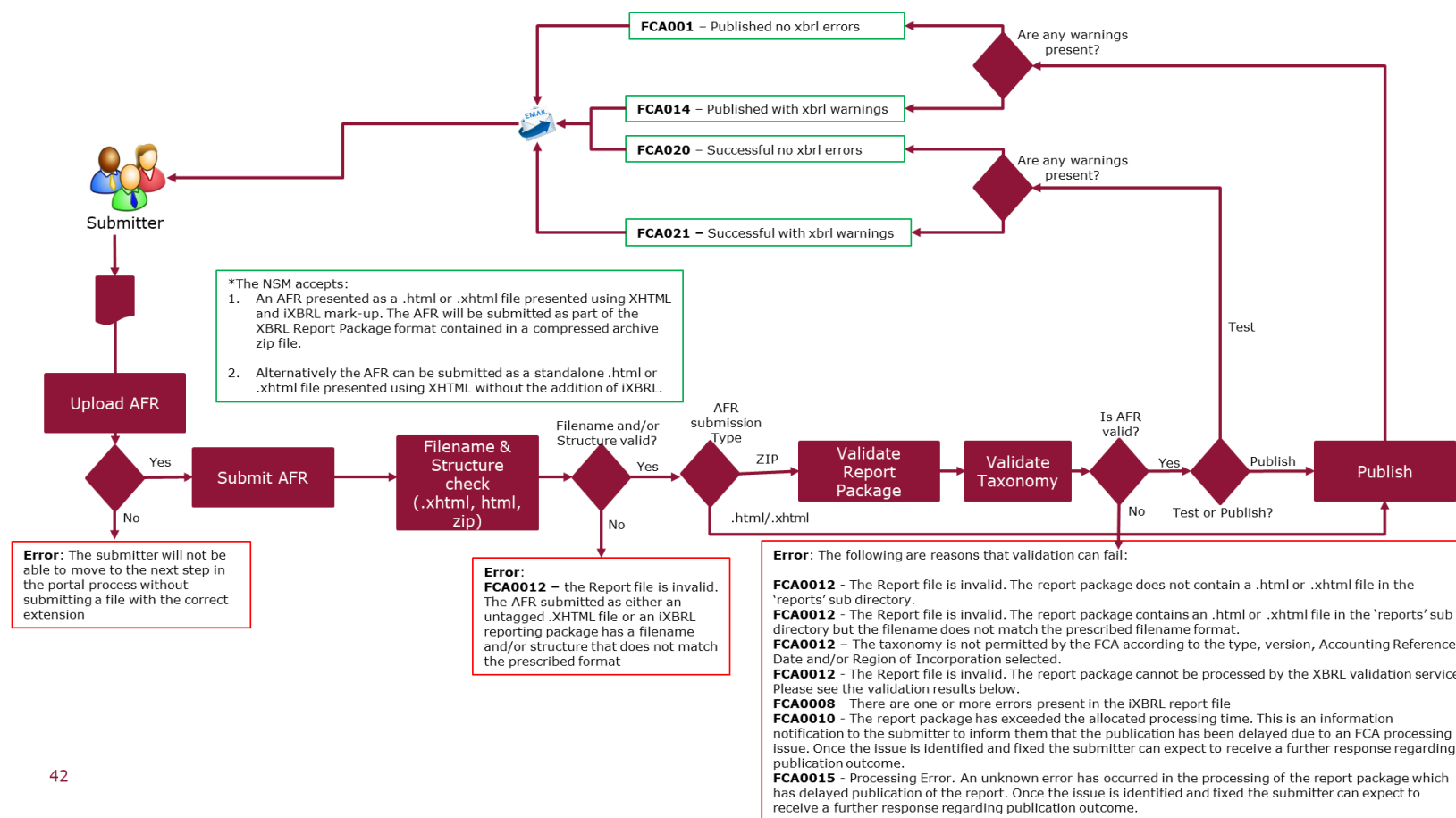
## d) File size limit

### **2.3d package/file size requirement:**

The FCA system is only able to process files up to a size of **100MB**. Any files larger than this may remain 'in progress' and will not constitute a filing. Please ensure the size of any submission is less than this limit prior to uploading.

### 3 The Document Submission Process

The following flow diagram provides a high-level view of the journey when submitting a structured AFR to the NSM. The submitter can expect to receive several responses during the submission process on the ESS portal and by email. When uploading a package, a submitter can select that it is for 'test submission only' – the main difference in approach is that if validations are passed (or only warnings generated), the submission will **not** be published.<sup>1</sup>



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<sup>1</sup> Note that we plan to update this diagram in a future version of this manual.

### 3.1 Filename validations

When a structured AFR (.xhtml, .html, .xbri 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 or {base}-{date}.xbri</p>	<p>This will be validated using the following regular expression mask:</p> <pre>(([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 xbri)</pre> <p>Online Regex tester - <a href="https://regex101.com/">https://regex101.com/</a></p>
<p>The report package must be in the right structure</p>	<p>This will validate that the reports directory contains NO subdirectories. It will additionally validate that one .html or .xhtml file is present as required by a valid report package.</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 .xhtml 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>
<p>The LEI in the filename must match the LEI of the issuer selected on the associated ESS case</p>	<p>Compares the LEI in the filename with the 'Selected issuers' input on the ESS case.</p>

## 3.2 Taxonomy validation

For tagged files, the system will check whether an appropriate taxonomy has been used, considering the accounting reference date (balance sheet date) of the AFR entered in ESS. The system is currently set up to accept the following taxonomies:

Taxonomy (core entry point)	Accepted for accounting reference dates between: <sup>2</sup>	
	Start date	End date
<b>ESEF 2019</b> ( <a href="http://www.esma.europa.eu/taxonomy/2019-03-27/esef_cor.xsd">http://www.esma.europa.eu/taxonomy/2019-03-27/esef_cor.xsd</a> )	01-Jan-19	30-Dec-22
<b>ESEF 2020</b> ( <a href="http://www.esma.europa.eu/taxonomy/2020-03-16/esef_cor.xsd">http://www.esma.europa.eu/taxonomy/2020-03-16/esef_cor.xsd</a> )	01-Jan-19	30-Dec-22
<b>ESEF 2021</b> ( <a href="http://www.esma.europa.eu/taxonomy/2021-03-24/esef_cor.xsd">http://www.esma.europa.eu/taxonomy/2021-03-24/esef_cor.xsd</a> )	30-Dec-21	30-Dec-23
<b>ESEF 2022 v1.1</b> ( <a href="https://www.esma.europa.eu/taxonomy/2022-03-24/esef_cor.xsd">https://www.esma.europa.eu/taxonomy/2022-03-24/esef_cor.xsd</a> ) <sup>3</sup>	30-Dec-21	31-Dec-25
<b>ESEF 2024</b> ( <a href="https://www.esma.europa.eu/taxonomy/2024-03-27/esef_cor.xsd">https://www.esma.europa.eu/taxonomy/2024-03-27/esef_cor.xsd</a> )	31-Dec-2024	
<b>UKSEF 2021</b> ( <a href="https://xbrl.frc.org.uk/uksef/2021-01-01/uksef-2021-01-01_cor.xsd">https://xbrl.frc.org.uk/uksef/2021-01-01/uksef-2021-01-01_cor.xsd</a> )	01-Jan-19	30-Dec-22
<b>UKSEF 2022</b> ( <a href="https://xbrl.frc.org.uk/uksef/2022-01-01/uksef-2022-01-01_cor.xsd">https://xbrl.frc.org.uk/uksef/2022-01-01/uksef-2022-01-01_cor.xsd</a> )	01-Jan-19	30-Dec-23

These validations also apply to test filings. Therefore, an issuer submitting a test file using a previous year's report tagged with a new taxonomy may need to enter a fictitious, more recent accounting reference date in ESS to pass these validations.

<sup>2</sup> start date and end date inclusive.

<sup>3</sup> The system has also been set up to accept the UKSEF approach, which allows issuers to use the ESEF Taxonomies alongside the UK FRC Taxonomy suites using multiple target documents. Such files will be treated as ESEF files for validation purposes.



### **"http" vs "https" in entry points**

Please note that from the ESEF 2022 taxonomy onwards, ESMA uses an application layer protocol of "https" instead of "http". Details of the current and historical taxonomy entry points can be found on ESMA's ESEF Taxonomy web page.

The entry points for both UKSEF 2021 and UKSEF 2022 begin with the "https" protocol.

### **3.2. Entry point naming**

When tagging a file, issuers must ensure that their chosen taxonomy's entry point **exactly matches** the relevant entry point as it is presented in the table above, including the protocol. Any variations will fail validation.



### 3.3 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. Passed validation successfully but not published, with potential warnings reported as part of the XBRL Taxonomy process (where a submitter has selected 'test submission only')
4. 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.

Please note that the absence of any reported validation issues is no guarantee that the AFR is technically fully compliant. This remains the issuer's responsibility.

The following table defines the FCA summary status codes, messages, and descriptions that will be returned in the header of the XML validation file.<sup>4</sup>

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<sup>4</sup> Note that we plan to update this table in a future version of this manual.

NSMStatusCode	NSMStatusMessage	NSMStatusDescription
FCA0001	Published with No XBRL Errors or Warnings	Not Applicable
FCA0014	Published with XBRL warnings <sup>5</sup>	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 or .xhtml) file or an iXBRL Reporting Package has a filename and/or package structure that does not match the prescribed format.
FCA0012	The Report file is invalid	The report package does not contain a .html or .xhtml file in the 'reports' sub directory.
FCA0012	The Report file is invalid	The report package contains an .html or .xhtml file in the 'reports' sub directory but it does 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.
FCA0012	The taxonomy is invalid	The taxonomy is not permitted by the FCA according to the type, version, Accounting Reference Date and/or Region of Incorporation selected.
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.

<sup>5</sup> Warnings do not prevent a report from being published but need to be investigated. If you have investigated a warning and concluded there is no underlying issue to address, no further action is required.

NSMStatusCode	NSMStatusMessage	NSMStatusDescription
FCA0020	Successful	The AFR has passed the validation checks but not been published. This means that should you wish to resubmit the package as a case for publishing it should be accepted and made available on the FCA's National Storage Mechanism. However please be aware that we make changes to our validations, so a delay in resubmission could result in additional warnings or errors.
FCA0021	Success with XBRL warnings	<p>The AFR passed the validation checks with warnings. This means that should you wish to resubmit the package as a case for publishing it should be accepted and made available on the FCA's National Storage Mechanism. However please be aware that we make changes to our validations, so a delay in resubmission could result in additional warnings or errors.</p> <p>Validation checks have indicated that there are one or more warnings against the iXBRL report. Please see the validation results on the link for details. We recommend these are investigated. If you have investigated a warning and concluded there is no underlying issue to address, no further action is required.</p>

## 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"
  Version="1.1">

  <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:enumeration value="Success"/>
    <xs:enumeration value="Success with Warnings"/>
    <xs:enumeration value="Invalid Taxonomies"/>
  </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](#)