QUARTERLY COMPLAINTS REPORTING

SUBMISSION SCHEMA REFERENCE

Canada

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1. Submission process

To upload their quarterly complaint submission files to FCAC, institutions will be required to have already registered with FCAC and have a valid contact to submit bulk complaint files.

Bulk complaints can be uploaded as a single file and/or across multiple files within a package. The concept of a bulk complaint package will be made available via the secure portal (Portal) where users can log in, create a submission for the quarter in question and add files to the package over the quarter.

The upload submission process has two distinct phases – validation and submission. The validation process is a synchronous operation which will give institutions immediate feedback on their data to ensure it is structured and formatted correctly. Once the validation has passed, the file will be sent to be submitted where additional submission rules will be applied to inspect the data and ensure its compliance. This submission process is an asynchronous operation.

The following diagram outlines the upload process.
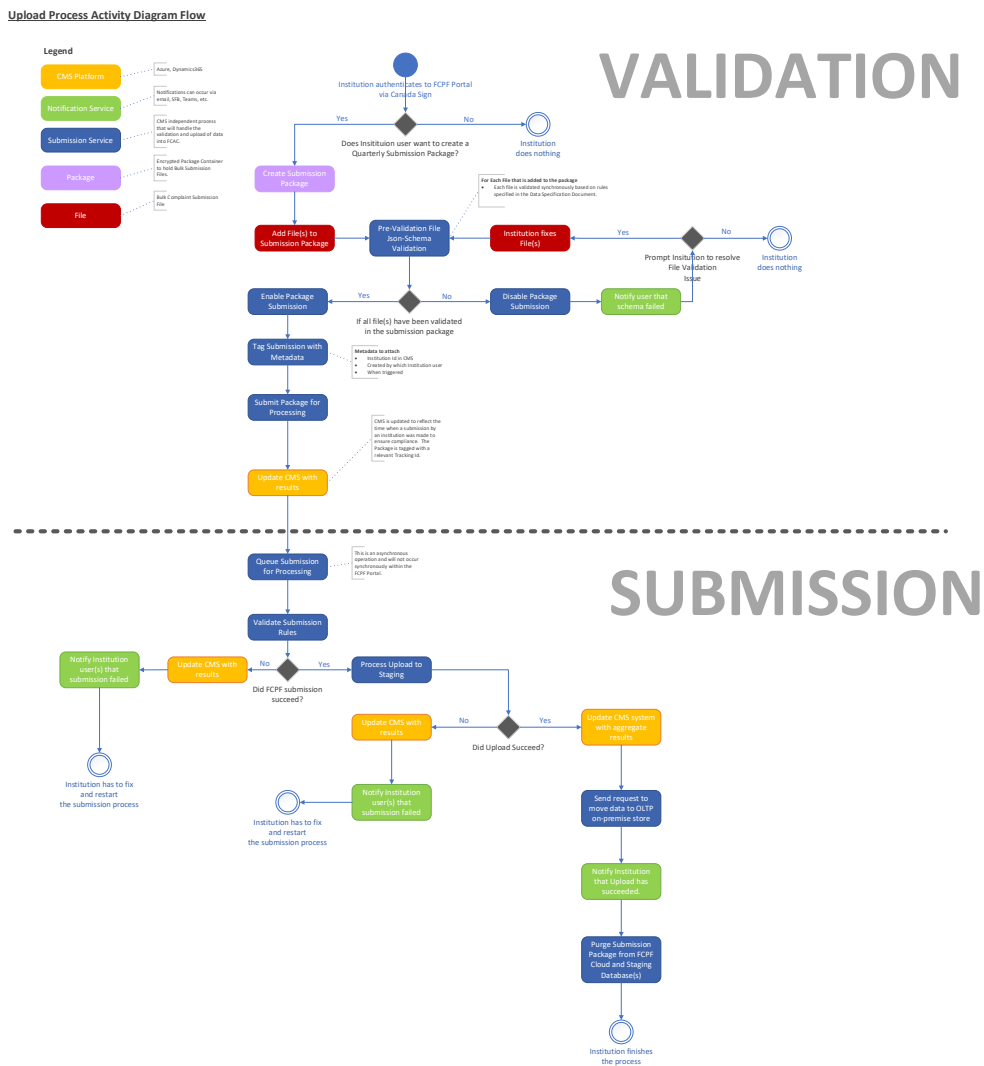
2. Submission details

The following table outlines the fields, the legal specification, rules for validation, field types and whether the fields are required or conditional.

In the field identifier column, text that appears in brackets (), indicates the sub-nodes where information appears under in the JSON Schema reference.

All validation rules are further detailed in Section 3.

Field Identifier	Definition	Legal Ref.	Required	Data Type	Validation Rule	Validation Rule ID
record-id	Identifier id for the complaint.		Yes	String (150)	Alpha numeric, spaces, dashes, and underscores	KA-01001
primary-product-service (classification)	Product or service to which the complaint relates	627.44 (g)	Yes	String (Enum) Account, Credit card, Debit card, HELOC, Insurance, Investment, Line of credit, Loan, Mortgage, Prepaid card, Other	Institutions can add multiple pairings of primary and secondary Product/Service complaints but must add at least one.	KA-01003
secondary-product-classification (classification)	Secondary product or service to which the complaint relates	627.44 (g)	Yes	String (Enum) Agreement, Alerts, Balance, Cancellation, Closure, Collections, Complaint handling, Credit limit, Creditor insurance, Estate, Fees / Charges, Financial advisor services, Interest, Internet banking / Services, Mobile phone banking / Services, Opening, Overdraft,		KA-01004

Field Identifier	Definition	Legal Ref.	Required	Data Type	Validation Rule	Validation Rule ID
				Payment, Power of attorney, Renewal, Safety deposit box, Statement, Telephone banking / Services, Teller services, Transaction, Transfer, Other		
channel	Media Channel the complaint originated from		Yes	String (Enum) Social, Voice, Email, Fax, Web, In-Person, Letter, Chat		
description	Description of the nature of the complaint	627.44 (g)	Yes	String (2500)		KA-01003
anonymous	Identifies whether the complaint was logged anonymously		Yes	Boolean		KA-01002
complainant-first-name	The first name of the person who made the complaint	627.44 (c)	If not anonymous	String (150)	Alpha numeric, spaces, commas, periods, apostrophes, dashes, underscores, and ampersands	KA-01001 KA-01002
complainant-last-name	The last name of the person who made the complaint	627.44 (c)	If not anonymous	String (150)	Alpha numeric, spaces, commas, periods, apostrophes, dashes, underscores, and ampersands	KA-01001 KA-01002
complainant-postal-code	The postal code of the complainant	627.44 (e) 627.46 (a)	If not anonymous	string (15)	Postal Code formatting will be applied per the	KA-01002 KA-01006 KA-01007

Field Identifier	Definition	Legal Ref.	Required	Data Type	Validation Rule	Validation Rule ID
			If unable to obtain the complainant-postal-code, the following standardized postal code is to be used: Q1Q 1Q1		Canada formatting standards. The value of 'International' is allowable and can be used at the discretion of the institutions.	
complainant-same-customer	Is the complainant the same as the customer		If not anonymous	Boolean		KA-01005
customer-type	Identifies whether the customer is a person or an organization.		If not anonymous	String (Enum) Personal, Commercial		KA-01002
customer-first-name	The first name of the person who requested or received from the institution the product or service to which the complaint relates	627.44 (d)	If not anonymous & If not complainant-same-customer & If customer-type is Personal	String (150)	Alpha numeric, spaces, commas, periods, apostrophes, dashes, underscores, and ampersands	KA-01001 KA-01002 KA-01005 KA-01008
customer-last-name	The last name of the person who requested or received from the institution the product or service to which the complaint relates	627.44 (d)	If not anonymous & If not complainant-same-customer & If customer-type is Personal	String (150)	Alpha numeric, spaces, commas, periods, apostrophes, dashes, underscores, and ampersands	KA-01001 KA-01002 KA-01005 KA-01008
customer-company	The name of the company the complaint is being filed on behalf of.		If not anonymous & If not complainant-same-customer	String (150)	Alpha numeric, spaces, commas, periods, apostrophes, dashes,	

Field Identifier	Definition	Legal Ref.	Required	Data Type	Validation Rule	Validation Rule ID
			& If customer-type is Commercial		underscores, and ampersands	
resolution-description	Description of any actions that were taken by the institution to attempt to resolve the complaint	627.44 (i)	Yes	String (3000)*		
compensation-description	Description of any compensation provided to the persons referred to in paragraph (c) or (d)	627.44 (j)	Yes	String (3000)*		
confirmation-provided	Confirmation that the institution provided the information referred to in paragraphs 627.65(a) to (c) to the person who made the complaint, if the institution did so	627.44 (k)	Yes	Boolean		
attachment-reference	Attachment of the recording or a transcript of the recording if the complaint was recorded or original version of the complaint	627.44 (a)(b)	Yes	String (Enum) Original in Writing, Call Recording, Call Transcript, Details of the Complaint (Not Recorded)		

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* In the event a complaint is "ongoing", and an institution is unable to provide the necessary information, please submit the following standardized wording: "Information unavailable".

Field Identifier	Definition	Legal Ref.	Required	Data Type	Validation Rule	Validation Rule ID
status	Current status of the complaint Enables the transmission of partial data to the portal over a quarter		Yes	String (Enum) Ongoing, Reopened, Resolved, Closed		
received-date	Date on which the institution received the complaint	627.44 (f)	Yes	Date	Date Format must be in YYYY-MM-DD format	KA-01009
resolved-date	Date on which the complaint was resolved if, in the institution's opinion, it was resolved to the satisfaction of the person who made the complaint	627.44 (h)	If status is Resolved	Date	Date Format must be in YYYY-MM-DD format	KA-01009 KA-01010
reopened-date			If status is Reopened	Date	Date Format must be in YYYY-MM-DD format	KA-01009 KA-01011
closed-date			If status is Closed	Date	Date Format must be in YYYY-MM-DD format	KA-01009 KA-01012

2.1 Institution Record ID

It is the duty of the institution to ensure they enter a corresponding Record Id with each complaint within their upload **{record-id}**. This is required to ensure that information can be matched accordingly, and duplicate records are not introduced into the system.

When multiple instances of the same record are identified by the system, the information will be versioned internally and the last content uploaded will be treated as the final submission. If a complaint is modified (i.e. re-opened over the course of multiple submission periods), the versioning will start at a new major version, otherwise all increments will be done using minor versions.

2.2 Incomplete Data

To ensure that FCAC receives complete and accurate information, a complaint record must be resubmitted in the quarter immediately following the last submission of that complaint record if:

- the complaint had an "Ongoing" or "Reopened" status, or
- the complaint had a change in value for any of the fields listed above since the last submission.

Effective as of the reporting period starting on April 1, 2024, complaint records must include the most current information for all data fields as at the time of submission.

2.3 Attachment Data

For the initial release, FCAC will not require the transmission of supporting data files to be attached to an Institution's submission, but will request that the type of attachment be documented **{attachment-reference}**.

3. Validation rules

When submitting data to FCAC, institutions can submit multiple files containing data as a package for the quarter. However, to pass validation, all information in the file must be correct and accurate.

The goals behind validation of the schema overall are:

- fail fast and provide synchronous results to institutions
- avoid data corruption
- inclusion of schema rules in validation of code in unit tests
- simplify processing code (and time)

The validation of a file is meant to be a synchronous cursory check to ensure that the data is in a format that abides by the specification outlined in Section 2 and should be immediately validated. Once a file(s) has been validated, it is tagged for submission, providing the user with a confirmation Upload Id where the file will then be queued for asynchronous submission.

When a validation of an upload file fails, the user(s) of the Institution are notified, and the onus is on the institution to resubmit their data again.

3.1 Detailed validation rules

The following rules were referenced in section 2 and are included here for clarity. The data field elements table outlines whether the rules are conditional and/or required.

KA-01001 - Can only include alpha numeric, spaces, dashes, and underscore characters

KA-01002 - If the complaint IS anonymous, the following fields are no longer required fields; complainant-last-name, complainant-first-name, company, postal-code, customer-first-name, customer-last-name.

KA-01003 - Institutions can add multiple pairings of primary and secondary Product/Service complaints but must add at least one.

KA-01004 - Institutions can only pair a secondary product service with their associated primary product service. A secondary product classification must be selected.

KA-01005 - If this is set to true, the customer's name is the same as the complainant and the customer first-name and last-name fields are not required.

KA-01006 - Postal code formatting will be applied per the formatting standards outlined here for Canada.

KA-01007 - The value of 'International' is allowable and can be used at the discretion of the institutions.

KA-01008 - If the customer-type is Personal, the customer-first and customer-last names are required but the company name is not required. If the customer-type is Commercial, the customer-company name is required but not the customer first and last names.

KA-01009 - Date format must be in YYYY-MM-DD

KA-01010 - When the status is set to "resolved", the resolved-date field is required but the reopened-date and closed date fields are not required.

KA-01011 - When the status is set to "reopened", the reopened-date field is required but the resolved-date and closed-date fields are not required.

KA-01012 - When the status is set to "closed", the closed-date field is required but the reopened-date and resolved-date fields are not required.

In addition to these rules (some of which are conditional) the following rules are always enforced.

1. Overall File Schema Validation

2. Corrupt Data Validation - Records that store illegal characters (i.e., corrupted data) will not be processed.

In the above cases, when validation fails, the institution will be notified, and the file will be discarded from the system. A record of the attempt to upload the data will be recorded in the FCAC system.

3.2 Multilingual Support

Complaint information can be provided in either French or English. If the complaint is received in any other language format, it must be translated to English before submitting to FCAC.

4. Submission rules

The rules for submission of data will be applied to ensure accuracy of data and completeness of information when processing data. Submission rules are created at the discretion of FCAC and may change over time.

When one submission rule fails, the entire submission is marked as invalid and further records are no longer processed. Based on the size and scope of submissions, submission rules are processed

in an asynchronous manner, institutions are notified of failures and success when processing submission rules.

The following submission rules are examples that FCAC will be looking to implement.

4.1 Other Classification Submission Rule

Rule: A submission must have less than 10% of it's records with a single product/service classification where both the primary and secondary are set to other.

Action: When this rule is encountered, the entire submission fails, and the institution is notified why the submission failed.

4.2 Anonymous Submission Rule

Rule: A submission must have less than 10% of its records identified as anonymous.

Action: When this rule is encountered, the entire submission fails, and the institution is notified why the submission failed.

In either of the above scenarios, the threshold can be modified should FCAC see trends emerging in submissions.

5. Quarterly submission periods

Institutions are required to submit data in a quarterly fashion as per the Government of Canada's quarterly periods 60 days after the end of quarter.

The following table is the suggested submission guidelines for calendar years.

Quarter	Begin	End	Submission Required By
Q1	April 1st	June 30th	August 29th
Q2	July 1st	September 30th	November 29th
Q3	October 1st	December 31st	March 1st
Q4	January 1st	March 31st	May 30th

In a leap year, the Q3 submission would be required by March 2nd of that year.

6. Progress notifications

One of the key components to the FCAC Quarterly Complaints Reporting system will be to ensure that Institutions and internal FCAC users to the system are notified when specific events are triggered.

Institutions will be notified in one of two modalities (and/or both) depending on the severity of the incident that is occurring – email and portal.

The following User roles have been identified for notification purposes:

Role	Description
Institution Email	This is the generic email address (i.e., a distribution list) that exists on the Institution record that can be used to receive notifications/alerts through.
Institution Administrator Email	This is the user that is identified as the Administrator/Power User on the Institution record. There is only one Administrator per Institution.
Institution User Email	There can be many Institution Users associated with an Institution that may have permission to submit bulk submissions to FCPF.

Where the word Portal is used, this can also connote the usage of notifications via service.

Event Trigger	Modality(s)	Email Distribution List	Additional Conditions
Quarterly Notification (60 Day) Reminder	Portal and Email	Institution Administrator	This is a record created in the portal account of when their submission is due. This would account for changes in Leap Years.
Quarterly Notification (30 Day) Reminder	Portal and Email	Institution Administrator	None
Quarterly Notification (5 Day) Reminder	Portal and Email	Institution Administrator, Institution User(s).	None
Submission Processed	Portal and Email	Institution Administrator and Institution User who submitted the QCR package.	None
Overdue Reminder	Portal and Email	Institution Administrator	The Institution is notified once (the day after the 60-day window has passed on the 61st day) that they're submission is overdue, and they are not in compliance.
Failed Submission	Portal and Email	Institution user who is uploading the file.	When a file is uploaded, the file can pass validation but if the file does not pass submission, it is marked as failed and the associated errors are associated to the file. This is an asynchronous process.
Late Submission	Email	The FCAC Lead Supervisor is notified of the late submission.	When a submission is made after the 60 days window provided to the institution.

All notifications that are included in the Portal are tagged against the Institution record and the associated User record that implemented the change.