



# FCAC SECURE PORTAL

## Quarterly Complaints Reporting

### Q/As



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## 1. Document Purpose

The purpose of this Questions and Answers (Q/As) document is to provide support to banks by providing technical information in relation to the requirement for banks to submit reportable complaints to FCAC on a quarterly basis. This Q/As document contains the most common questions.

Please note that this document is ever green in nature and will be updated regularly to provide relevant information.

## 2. Completeness of Complaint Records

### *2.1 Which complaint records should be included in the JSON file?*

Please ensure to upload **complete** complaint records within the JSON file (not just what changed since the last time the complaint was reported via the portal).

For every filing, banks should include all new complaints as well as all data for old complaints which were still open/reopened from the previous period.

## 3. Sequence of Files

### *3.1 Are banks required to upload files in a certain sequence or chronological order?*

FCAC expects banks to upload files to a Quarterly Complaints Report (QCR) package in a chronological order. For example, if file A represents complaints as at 2022-09-20, and file B represents complaints as at 2022-09-29, please upload file A first, then file B.

### *3.2 Is there a partial validation/submission failure in case of multiple files?*

If multiple files are uploaded, only those that have errors will need to be corrected and re-uploaded.



## 4. Special Characters

### 4.1 Are there any restrictions as to special characters for French text?

Special characters, when converted, can create an error (e.g., é converted into Ã©). This error may originate before or at the time complaints reports are converted into JSON format. Please ensure there are no conversion issues affecting French text in your QCR submissions.

### 4.2 What is an acceptable naming convention for a JSON file?

FCAC has not stipulated a naming convention for the actual JSON file(s) being uploaded. There are, however, certain special characters that a file name **cannot** contain, which are as follows:

\, /, :, \*, ?, " , < , > , | , @ , ! , \$ , % , & , ` , = , . , { , } , [ , ] , " , "

## 5. Description Field

### 5.1 Are banks expected to complete the description fields?

The [Submission schema reference](#) requires that banks complete the *description*, *compensation-description* and *resolution-description* fields (i.e., cannot be left blank).

The standardized wording “information unavailable” should only be used in the *resolution-description* and *compensation-description* fields if the complaint is ongoing, and if the bank is unable to provide the necessary information at the time of reporting the complaint. When closing or resolving a complaint, banks must ensure that the description fields are up to date. To this effect, banks should provide in the resolution-description field a description or a up to date description of any actions that were taken by the institution to attempt to resolve the complaint. Even if the institution was not able to reach the person who made the complaint, it would be essential that the field shows what actions the institution took to try to resolve the complaint.

If compensation has not been provided to the person who made the complaint, please use “compensation not provided” in the *compensation-description* field.

### 5.2 What is the limit character of the description field?

The *description* field has a limit of 2500 characters. Please ensure that the QCR submissions follow the rules set out in FCAC’s [Submission schema reference](#). This will ensure the description field is completed and within the limit of 2500 characters.



### 5.3 What is considered an appropriate description field?

Please refer to the FCAC's Regulatory Reporting Guide ([Guide](#)) - subsection entitled FCAC's expectations on fields that require a description - for guidance on what is an appropriate description.

## 6. Complainant-Same-Customer Field

### 6.1 What should be entered in the customer first-name and last-name fields if the field complainant-same-customer is set to the value true?

If *complainant-same-customer* is set to the value *true*, it means the complainant is the same person as the customer. Therefore, the *customer-first-name* and *customer-last-name* fields should be either empty/blank, or *customer-first-name* should be the same as *complainant-first-name*, and *customer-last-name* should be the same as *complainant-lastname*.

## 7. Complaint Reporting Submission Deadlines

FCAC Quarter	For Period	Deadline
Q1	April 1 to June 30	August 29
Q2	July 1 to September 30	November 29
Q3	October 1 to December 31	March 1
Q4	January 1 to March 31	May 30

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

For more information, please refer to section V of the [Regulatory reporting guide for banks and authorized foreign banks](#).

## 8. QCR Package

### 8.1 Can a package be modified once it has been submitted to FCAC?

The quarterly complaints submission functionality via the Portal was designed for institutions to be able to upload multiple files for a given reporting quarter, but only allowing the submission of that quarterly package to be submitted once. Once a report is submitted, it can no longer be modified.

As the submitted report cannot be modified, the missing information and/or complaint will need to be included in the next quarter submission and the Senior Supervisor assigned to your institution must be advised immediately.



As only one package submission is permitted per quarter, please ensure you have successfully uploaded all your files before submitting your report. The files that have errors can be corrected and re-uploaded as many times needed, as long as the package has not been submitted.

## 9. Postal Code

*9.1 How does a bank intake a complaint for a complainant without a postal code, given that it is a mandatory field and requirement?*

627.44(e) of the Bank Act requires the collection and maintenance of the “the contact information provided by the person who made the complaint”. 627.46(a) requires that the postal code be reported to FCAC along with other elements of 627.44. As such, FCAC made the postal code a mandatory field in the schema as the legislation requires banks to collect that information related to the complainant, whether or not they are already a customer of the bank.

While we understand that there may be limited cases where it is not possible to obtain a complainant’s postal code (for example when the complainant refuses to provide it), FCAC expects banks to deploy reasonable efforts to obtain that element (as it expects the same with all the information elements outlined in 627.44).

FCAC has determined that it will not be possible to leave the postal code field blank, and as such FCAC requires banks to use the following standardized postal code in the event of not being able to obtain it: Q1Q 1Q1.

## 10. Optional Fields

*10.1 How should an optional field be handled in the JSON file?*

If a field is optional and has no data, you must leave it out of the file entirely rather than leaving it blank. This will allow it to pass validation.