



MCLOUD: WMPF FAQS

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Process

What information do I need to submit?

You are required to submit two data files regarding any employee who was an active member of the WMPF on or after 1st April 2014 in relation to 2 areas:

- Hour changes
- Service Breaks

How will the Fund check they have had all the data for affected members?

The Fund will carry out a reconciliation exercise to assess the data received and identify any gaps.

Where there has been a change of payroll provider who is the Fund expecting to receive the data from?

Ultimately employers are responsible for providing the required information. If an employer has had more than one payroll provider during the period, the data will need to be collated into one file before being submitted to the Fund.

Can a payroll provider upload the data on an employer's behalf?

Yes, however the files must contain all data for the period, therefore if there has been another payroll provider during that time the data will need to be collated before being submitted to the Fund (i.e. there must be only one file for hour changes and one file for service breaks per employer for each time period requested)

Can I submit more than one file each year (e.g. where there has been a change of payroll provider)?

The Fund requires one hour change and one service break data file per employer for each time period requested. If an employer has had more than one payroll provider over the period for which the data is required, they will need to collate the data into one template before submitting to the Fund.

I provide payroll functions for multiple employers and usually upload my monthly data information in one file for all employers – can I do this with the McCloud data?

No, you must upload the 2 data files (one for hours data and one for service break data) relevant to each employer via the specific employer record. You must not submit multiple files via one upload as this will prevent the internal processes from working correctly and may result in the entire file being rejected for resubmission by you.

What happens where a member has amalgamated benefits? How will I know if they are captured by McCloud for service I am unable to see?

The Fund is requesting data for all members active on and after 1st April 2014 whether they are still in service with you or have left – this will capture any data required where amalgamation of records may have taken place or may take place in the future.

Can the Fund provide me with a list of members they believe I need to submit data for?

You must provide data for all members who were active on and after 1st April 2014 – the Fund will carry out the test as to whether they are affected by the McCloud remedy.

Data Requirements

Do I have to include details of those members that have received a full refund?

No, the Fund does not require data relating to those employees where you have already made payment of a refund.

Can I submit data relating to those members who have had changes only?

Hours Change data

No, the Fund requires submission of data for all members active on or after 1st April 2014 as a certification that all members have been reviewed. This is a recommendation from the Scheme Advisory Board McCloud Working Group. For those members that have remained full time throughout the period there will just be one entry on the hours file. Essentially, everyone who has been employed by you and was a member of the WMPF at and since 1st April 2014 must be included on the hours data file

Service Break Data

Only members who have had a service break will need to be detailed on this file. Members on this file must be present on the hours change file also (including those that remained in full time employment throughout the period)

If you do not submit a service break data file, the Fund will assume there have been no service breaks for your WMPF members during the period.

Will the data collection template remain the same for the period 1st April 2021 to 31st March 2022?

Yes.

Why do I only need to submit data regarding hour changes and service break information post April 2014?

Hour change and service break information was collected and uploaded to member records prior to 1st April 2014.

Do I need to include data for casual members?

Yes, average annual hours will need to be submitted for each year (or part year where the member has left) of casual membership. This should be calculated in the same way as it was pre 2014. A guidance document can be found [here](#) on the Fund's website on how to perform this calculation.

Timescales

What is the deadline for submission of the data?

Data for the period 1st April 2014 – 31st March 2021 – via the standard data collection template and uploaded via the employer portal by 31st October 2021;

Data for the period 1st April 2021 – 31st March 2022 – via the standard data collection template and uploaded via the employer portal by 31st May 2022.

I have concerns about being able to meet the Fund's specified deadlines, what should I do?

If you are experiencing difficulties with this, please complete the survey using the link provided in the briefing note or contact WMPFEmployerLiaison2@wolverhampton.gov.uk as soon as possible.

Funding Implications

What allowance was made for the McCloud/Sargeant ruling as part of the 2019 Actuarial Valuation?

The Fund actuary applied a past service asset reserve of 1.5% to allow for any potential cost implications as a result of the ruling aligned to the Fund's Funding Strategy Statement. Any impact on liabilities will vary by employer dependent upon each individual employer's membership profile, but at a whole fund level it is expected that the effect will not be material, and any variations will be addressed at the next actuarial valuation in 2022.

Accounting standards specify explicit lines in asset reserves with respect to McCloud. How is the remedy applied for accounting disclosures?

This is subject to confirmation by your auditor, however as a default position for all employers, an explicit reference to the potential impact of McCloud was provided within accounting disclosure reports. Some employers included an allowance in their 2019 accounting report and where this is the case, no further explicit allowance was made in the 2020 accounting reports as no new information with regards to the remedy was received.

Are there any financial impacts - other than the past service asset reserve – to an organisation in respect of the McCloud judgement?

The effects of the judgement in the context of employer funding are unknown at this stage until all data rectification work has been completed and therefore any financial impacts will be factored into the next valuation.

Other

Do I have to provide this data?

The data is needed to comply with legislative changes that will be made to the LGPS to remove unlawful age discrimination. You are legally required to provide administering authorities with the information needed to calculate members' benefits.

What happens if I cannot supply the data?

You are legally required to provide the data needed to calculate pension benefits. If you are experiencing difficulties with this, please complete the survey using the link provided in the briefing note or contact WMPFEmployerLiaison2@wolverhampton.gov.uk as soon as possible.

You should be aware that failure to provide the data may increase your liabilities in the Scheme and therefore could lead to an increase in your employer contribution rate at the next valuation.

I have been including hour changes and/or service break information on the monthly data collection files, why do I have to submit it again?

Hour changes are currently only required to be submitted for protected members, therefore you will need to submit this data for all members to ensure the full position is captured.

My organisation had other contracts in the WMPF that are no longer active, do you need the data for these records also?

Yes, it is very likely that we will need this data however we are not asking you to submit this at this time. We are currently awaiting further guidance from the Scheme Advisory Board's McCloud Working Group which may cover issues such as how to approach terminated employers and members who have transferred out of the Fund.

Will there be any further requests for information after I have submitted this data?

The government response to the consultation is not expected until the end of this year, therefore we cannot categorically say that there will not be any further requirements of the Fund and/or its employers at this stage.

I have a concern about the expectations of my organisation how do I speak to the Fund about this?

In the first instance you should submit all queries, comments and concerns via the survey link provided in the briefing note.