

# McCLOUD: WMPF FAQs

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#### Version Control

Version 4.3, 25<sup>th</sup> January 2022 supersedes all previously issued versions.

This version contains changes to the data collection requirements for both 2021/22 data and the 2022/23 data on pages 7, 12, 14, and 17, and an update to the advice for terminated employers on page 19.

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## DATA REQUIREMENTS - GENERAL

### WHAT INFORMATION DO I NEED TO SUBMIT?

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

#### Hour changes

**Service Breaks** (*note, you will be required to complete the service breaks process and select the option “no file required” if there are no employees with service breaks during the period.*)

### 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 1<sup>st</sup> April 2014.

### 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 also be present on the hours change file (including those that remained in full-time employment throughout the period). If you have no service breaks to report, you will be able to confirm this within the process and no service break data file will be required.

### 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 via your payroll.

### FOR AN EMPLOYEE WHO HAS BEEN IN FULL TIME SERVICE THROUGHOUT THE PERIOD AND REMAINS IN SERVICE AS AT 31ST MARCH 2021 SHOULD FIELDS 12 AND 13 BE LEFT BLANK?

The start date (field 12) should be defaulted to 1<sup>st</sup> April 2014 and the end date (field 13) will remain blank.

### WHAT SHOULD THE START DATE BE FOR A MEMBER WHO JOINED THE FUND PRIOR TO 1ST APRIL 2014?

The earliest start date that should be detailed on the hours data template is 1<sup>st</sup> April 2014. For any employees who joined the Fund prior to this date the first entry should be defaulted to 1<sup>st</sup> April 2014.

### WHAT SHOULD THE START DATE FOR A MEMBER WHO HAS BEEN FULL TIME THROUGHOUT BE?

Where the member was in service prior to 1<sup>st</sup> April 2014 this entry should be defaulted to 1<sup>st</sup> April 2014. Where the member joined WMPF post 1<sup>st</sup> April 2014 you should input the actual date of joining.

### WHERE A MEMBER HAS MULTIPLE JOBS SHOULD THESE BE COMBINED OR DETAILED SEPARATELY?

Each job/position has a separate pension reference number and should be detailed separately on each file.

#### FOR A MEMBER WHO HAS LEFT SHOULD THE END DATE (FIELD 13) BE INPUT AS THE DATE OF LEAVING?

You do not need to confirm the date of leaving on the hours data template. The end date should only be completed where there is a subsequent change in part time or whole-time equivalent hours.

#### DO I NEED TO INCLUDE ANY MEMBERS WHO HAVE OPTED OUT?

Yes, with the exception of those members who opted out with less than 3 months service and received a refund via your payroll.

#### DO YOU REQUIRE THE DATA FOR A MEMBER WHO OPTED OUT?

Data is required where a member opted out with more than two years' pensionable service. Any member who opted out and received a refund via payroll should not be included in the data templates.

#### WHERE A MEMBER HAS MULTIPLE JOBS SHOULD THESE BE COMBINED OR DETAILED SEPARATELY?

Each job/position has a separate pension reference number and should be detailed separately on each file.

#### DOES THE CURRENT MONTHLY DATA COLLECTION TEMPLATE INCORPORATE THE REPORTING REQUIREMENTS FOR 1 APRIL 2021 TO MARCH 2022?

Initial requirements confirmed that we intended to request hours changes and service breaks via the monthly data submission process with effect from April 2022; however, this change will now **not** be implemented from the April 2022 data submission (due by 19<sup>th</sup> May 2022). It is anticipated that we will request a further file be submitted to confirm any changes for the period 1<sup>st</sup> April 2022 to 31<sup>st</sup> March 2023.

Clarification on how hours changes and service breaks are to be collected going forward will follow in the future. Any hours or services breaks submitted via the monthly data collection template (with the exception of protected members) will not be loaded to member records.

#### WHAT IS THE MAXIMUM ROWS OF DATA THAT CAN BE UPLOADED IN 1 DATA FILE?

Each of the files (one for hours and one for service) must be less than 30MB. If one of your files is larger than this, please contact [WMPFmccloud@wolverhampton.gov.uk](mailto:WMPFmccloud@wolverhampton.gov.uk) for additional instructions on how to upload them. If you are unsure if one of your files is larger than 30 MB, you can find this by using the File Checker.

#### WHERE CAN I FIND MORE INFORMATION ABOUT WHAT EACH OF THE ERRORS MEANS?

These can be found in the appendix of the full guidance document which can be found [here](#).

#### DO YOU REQUIRE ONE INDIVIDUAL FILE FOR EACH FINANCIAL YEAR OR ONE FILE TO COVER THE WHOLE PERIOD 1ST APRIL 2014 TO 31ST MARCH 2021 WITH A SEPARATE LINE (MAYBE MORE) ON THE FILE FOR EACH YEAR?

We require data files for the following periods:

- two files for the whole period 1<sup>st</sup> April 2014 to 31<sup>st</sup> March 2021 (one for hours and one for service breaks)
- two files for the period 1<sup>st</sup> April 2021 to 31<sup>st</sup> March 2022 (one for hours and one for service breaks)
- two files for the period 1<sup>st</sup> April 2022 to 31<sup>st</sup> March 2023 (one for hours and one for service breaks)

It is plausible that there could be multiple lines on the files for an individual if:

- There have been several hour changes or service breaks during the relevant period.
- The member has multiple employments.
- The member is casual, as a line is required for each scheme year in the hours file.
- The full-time hours denominator has changed (e.g., from 36.50 to 37.00).

#### SHOULD I SUBMIT THIS INFORMATION USING THE MONTHLY DATA COLLECTION TEMPLATE?

No, you must submit the .csv data files following the details specified in the McCloud Data Collection File Layout and related information found on the Fund's [Website](#). This data must not be submitted via the MDC process. Clarification on how hour changes and service breaks are to be collected going forward will follow in the future.

#### WILL THE DATA COLLECTION TEMPLATE REMAIN THE SAME FOR THE PERIOD 1<sup>ST</sup> APRIL 2021 TO 31<sup>ST</sup> MARCH 2022 AND FOR 1<sup>ST</sup> APRIL 2022 TO 31<sup>ST</sup> MARCH 2023?

Yes.

#### DO I NEED TO INCLUDE DATA FOR CASUAL/FEE-BASED 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.

#### WHAT IS THE DIFFERENCE BETWEEN A CONTRIBUTING AND NON- CONTRIBUTING MEMBER?

A contributing member is someone who was actively contributing to the WMPF (i.e., an active member) on 31<sup>st</sup> March 2021.

A non-contributing member is someone who was not actively contributing to the WMPF (they may or may not still have been employed by you) on 31<sup>st</sup> March 2021.

#### ONE OF MY PREVIOUS PAYROLL PROVIDERS WON'T GIVE ME THE INFORMATION I NEED WHAT SHALL I DO?

It is our understanding that this data should have been provided to you at the date the contract ended. Initially, we would ask that you attempt to obtain this information once again from the payroll provider, explaining that it is required to comply with legislative changes, and as the employer you are legally required to provide the administering authority with the information it needs to calculate member benefits.

If you continue to have issues, please contact the WMPF McCloud team on [WMPFmccloud@wolverhampton.gov.uk](mailto:WMPFmccloud@wolverhampton.gov.uk)

#### AS AT WHAT DATE DOES FIELD 11 (CONTRIBUTING OR NON- CONTRIBUTING FLAG) NEED TO BE CONFIRMED?

You should enter this flag as per the employees WMPF membership status on 31<sup>st</sup> March 2021. If the member is in active membership on 31<sup>st</sup> March 2021 this will show as 'C' for all entries. If the member left the Fund prior to 31<sup>st</sup> March 2021 this should show as an 'N' for all entries.

## DATA REQUIREMENTS – CASUALS, FEE BASED AND TERM TIME

### DOES OVERTIME NEED TO BE REFLECTED IN THE MCCLLOUD HOURS DATA FILE?

No, you only need to provide the contractual hours worked by a member - any overtime hours should be ignored.

### DO I NEED TO INCLUDE DATA FOR CASUAL/FEE-BASED MEMBERS?

Yes, average hours will need to be submitted for each scheme 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.

### HOW DO I CONFIRM THE HOURS FOR A FEE-BASED MEMBER?

Fee based members should be shown as full time as the pay submitted to the Fund should have been the actual pensionable pay received by the member and not a full time equivalent.

### HOW DO I CONFIRM VARIABLE HOURS?

Variable hour members should be treated in the same way as part-time members, i.e., actual hours worked are recorded for the period.

### WHERE ARE CASUAL HOURS DETAILED ON THE DATA TEMPLATE?

There is no statutory guidance available as yet regarding the treatment of casual hours members; however, the Fund requests that in these cases you submit the average hours for each scheme year since 1<sup>st</sup> April 2014 to 31<sup>st</sup> March 2021 (or the date of leaving scheme if earlier) using fields 15a and 15b. You will need to do this for all members who were active on or after 1<sup>st</sup> April 2014. The end date (field 15b) for the last entry for a casual member should be left blank (i.e., you do not need to input either the date of leaving or 31<sup>st</sup> March 2021).

You can find details of how to calculate these [here](#).

### HOW DO YOU TREAT SERVICE BREAKS FOR CASUALS?

It is not anticipated that a casual employee would have a service break – please contact [WMPFMcloud@wolverhampton.gov.uk](mailto:WMPFMcloud@wolverhampton.gov.uk) if you need to query this further, providing the specific details regarding the member concerned.

### WHERE A CASUAL EMPLOYEE HASN'T WORKED THE ENTIRE SCHEME YEAR, DO WE STILL RECORD IT WITH AN 'N' IN THE CONTRIBUTING COLUMN OR DO WE JUST RECORD THE YEARS IN WHICH THEY HAVE WORKED/HAVE EARNINGS?

If a member remains in employment on 1<sup>st</sup> April 2021, you should record 'Y' in field 11; If the member left prior to 1<sup>st</sup> April 2021 the flag in field 11 should be 'N' for all entries.

With respect to casual members who have not worked within the relevant scheme year, but have worked in a subsequent scheme year, you should enter the hours worked as 0.01 in the PT hours field, 15a (the system is unable to accept 0.00).

### HOW DO WE RECORD DATA FOR CASUAL STAFF WITH VARIABLE AND NO WHOLE-TIME EQUIVALENT HOURS?

You should detail the average hours for each scheme year (a line will be required for each year in the hours data template). You may wish to use the same whole-time equivalent entry as for your organisation's non-casual employees.

### WHAT WILL THE WHOLE-TIME EQUIVALENT HOURS BE FOR A FEE-BASED EMPLOYEE?

This is a decision for the employer, though you may wish to use the same whole-time equivalent hours as applied to non-fee-based employees.

### HOW DO I RECORD THE HOURS FOR A MEMBER WHO WAS TERM TIME?

You are required to provide the hours the member actually worked per week, and not adjusted for the number of weeks worked as per the recording of these members prior to 1<sup>st</sup> April 2014.

Whilst some funds may operate different recording methods than WMPF, membership is only adjusted if a member is working part-time/variable-time hours - no adjustment is made as a consequence of term-time working.

If a member is term-time it is the full-time equivalent pay that is adjusted to reflect the reduced contracted weeks.

You can find details and examples of how to calculate these [here](#).

## DATA REQUIREMENTS – SERVICE BREAKS

### WHAT IS CLASSIFIED AS A SERVICE BREAK?

Service break data is needed for all periods of authorised unpaid leave, trade disputes and unauthorised unpaid leave. Authorised unpaid leave, for this purpose, includes:

- any period of unpaid additional maternity or adoption leave, generally from week 40 to week 52, but may start from week 27
- any period of unpaid shared parental leave
- any period of unpaid parental bereavement leave
- any period of unpaid leave the member chooses to take, for example, time off for a sabbatical or where a member who works in a school wishes to take leave in term-time.

Where a break for one of the reasons listed above has occurred you must insert the reason the member had a service break on the data template based on the below coding:

- A** = Authorised unpaid leave.
- B** = Absent due to trade dispute.
- C** = Unauthorised leave.

Service break data is not required for ordinary maternity leave, paid additional maternity leave or paternity leave. Please refer to [this document](#) for more information regarding what constitutes a service break.

### WHERE A MEMBER HAS CEASED EMPLOYMENT AND THEN RETURNED TO US AT A LATER DATE IS THIS A SERVICE BREAK?

No, this is not a service break and should be detailed as two separate periods of membership on the template.

### HOW DO I REFLECT 'KEEPING IN TOUCH' (KIT) DAYS FOR MEMBER ON THE SERVICE BREAK DATA TEMPLATE?

Where a member has one or more KIT days that are pensionable you will need to detail the service break details around the KIT day.

For example, if a member has a service break from 1<sup>st</sup> April 2016 until 30<sup>th</sup> September 2016 with a KIT day on 25<sup>th</sup> May 2016 you will need to input two lines of data to show the service break from 1<sup>st</sup> April 2016 until 24<sup>th</sup> May 2016 and then again from 26<sup>th</sup> May 2016 until 30<sup>th</sup> September 2016.

### IF THERE ARE NO MEMBERS WITH A BREAK IN SERVICE WHAT DO I DO?

The second part of the McCloud Hub process relating to service breaks will still need to be completed; however, at the file upload stage you should select 'No' to confirm there is no service break file to submit.

### IF I HAVE SELECTED THE WRONG OPTION DURING THE SERVICE BREAK STAGE OF THE PROCESS (I.E. I HAVE ANSWERED 'NO' THERE ARE NO SERVICE BREAKS BUT THE CORRECT ANSWER IS 'YES', OR VICE VERSA) HOW DO I GO BACK TO THE PREVIOUS STAGE ?

Contact the WMPF McCloud team directly at [wmpfmcloud@wolverhampton.gov.uk](mailto:wmpfmcloud@wolverhampton.gov.uk).

### WHAT SHOULD THE START DATE (FIELD 16) BE FOR A SERVICE BREAK THAT COMMENCED PRE 1<sup>ST</sup> APRIL 2014?

You must input the date as 1<sup>st</sup> April 2014

### DO I INSERT AN END DATE (FIELD 17) FOR A MEMBER WHO IS STILL IN A SERVICE BREAK AT 31<sup>ST</sup> MARCH 2021?

Yes, you must input the 31<sup>st</sup> March 2021 date if the member was still in a break of membership at or after the 31<sup>st</sup> March 2021.

## UPLOAD PROCESS

**IMPORTANT:** If you have access to Hub but you outsource your payroll to a 3<sup>rd</sup> party provider, and they usually submit your monthly return via Employer Hub on your behalf, the process will need to be manually re-routed to your workfeed once you have started the process. Please contact [WMPFmccloud@wolverhampton.gov.uk](mailto:WMPFmccloud@wolverhampton.gov.uk) if this applies to you.

If you do not have access to Hub but need to submit a file, please contact [WMPFmccloud@wolverhampton.gov.uk](mailto:WMPFmccloud@wolverhampton.gov.uk).

### HOW DO I SUBMIT THE DATA TEMPLATES TO THE FUND?

Files should be submitted as a .csv file via the Fund's Employer Hub. Guidance on the upload process is available [here](#).

### SHOULD I SUBMIT THIS INFORMATION USING THE MONTHLY DATA COLLECTION TEMPLATE?

No, you must submit the .csv data files following the details specified in the McCloud Data Collection File Layout and related information found on the Fund's [Website](#). This data must not be submitted via the MDC process. Clarification on how hour changes and service breaks are to be collected going forward will follow in the future.

### WILL MY PAYROLL PROVIDER UPLOAD THIS DATA FOR ME?

We would advise you to have a discussion with your payroll provider regarding who will submit this data for your organisation. If you have had more than one payroll provider during the period (1<sup>st</sup> April 2014 to 31<sup>st</sup> March 2021), you will need to ensure that data is all collated into one file (i.e., we cannot accept multiple files from one employer). If your current payroll provider won't do this for you and you don't have access to Employer Hub please contact [WMPFmccloud@wolverhampton.gov.uk](mailto:WMPFmccloud@wolverhampton.gov.uk) and we can discuss alternative solutions.

### CAN A PAYROLL PROVIDER UPLOAD THE DATA ON AN EMPLOYER'S BEHALF?

Yes, however, the files must contain all data for the period (1<sup>st</sup> April 2014 to 31<sup>st</sup> March 2021), 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 hours change and one service break data file per employer for each time period requested (1<sup>st</sup> April 2014 to 31<sup>st</sup> March 2021). 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.

## PAYROLL PROVIDER

### CAN A PAYROLL PROVIDER UPLOAD THE DATA ON AN EMPLOYER'S BEHALF?

Yes, however, the files must contain all data for the period (1<sup>st</sup> April 2014 to 31<sup>st</sup> March 2021), 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).

### WILL MY PAYROLL PROVIDER UPLOAD THIS DATA FOR ME?

We would advise you to have a discussion with your payroll provider regarding who will submit this data for your organisation. If you have had more than one payroll provider during the period (1<sup>st</sup> April 2014 to 31<sup>st</sup> March 2021), you will need to ensure that data is all collated into one file (i.e., we cannot accept multiple files from one employer). If your current payroll provider won't do this for you and you don't have access to Employer Hub please contact [WMPFmcccloud@wolverhampton.gov.uk](mailto:WMPFmcccloud@wolverhampton.gov.uk) and we can discuss alternative solutions.

### 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 (1<sup>st</sup> April 2014 to 31<sup>st</sup> March 2021), the data will need to be collated into one file before being 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 two 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.

### IF WE NO LONGER PROVIDE PAYROLL SERVICES FOR AN EMPLOYER SHOULD WE PASS THE DATA TO THEM TO PRODUCE THE DATA TEMPLATES?

We would expect ex-clients of a payroll provider to contact you regarding any data they require to fulfil the requirements for McCloud. To assist any previous clients, you may wish to forward relevant data you hold to them to assist with data collation where it was not provided at the time the contract to provide payroll services ceased.

### WE BECAME THE PAYROLL PROVIDER FOR A WMPF EMPLOYER AFTER 1<sup>ST</sup> APRIL 2014 – DO WE JUST UPLOAD DATA FOR THAT PERIOD ONLY?

No, the data for the full period from 1<sup>st</sup> April 2014 to 31<sup>st</sup> March 2021 must be uploaded in one data template. You may wish to liaise with your client(s) regarding who will upload this collated file.

### ONE OF MY PREVIOUS PAYROLL PROVIDERS WON'T GIVE ME THE INFORMATION I NEED WHAT SHALL I DO?

It is our understanding that this data should have been provided to you at the date the contact ended. Initially we would ask that you attempt to obtain this once again from the payroll provider explaining that this information is required to comply with legislative changes and as the employer you are legally required to provide the administering authority with the information it needs to calculate member benefits.

If you continue to have issues, please contact the WMPF McCloud team on [WMPFmcccloud@wolverhampton.gov.uk](mailto:WMPFmcccloud@wolverhampton.gov.uk)

## TIMESCALES

### WHAT IS THE DEADLINE FOR SUBMISSION OF THE DATA?

Data for the period **1<sup>st</sup> April 2014 – 31<sup>st</sup> March 2021** – via the standard data collection template and uploaded via the employer portal by 12<sup>th</sup> November 2021.

Data for the period **1<sup>st</sup> April 2021 – 31<sup>st</sup> March 2022** – via the standard data collection template and uploaded via Employer Hub by 30<sup>th</sup> September 2022.

Data for the period **1<sup>st</sup> April 2022 – 31<sup>st</sup> March 2023** – data collection process will be confirmed in due course.

### 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 [WMPFMcloud@wolverhampton.gov.uk](mailto:WMPFMcloud@wolverhampton.gov.uk) as soon as possible.

### THE REQUESTED TIMESCALE IS AN ISSUE FOR ME - WHY HAVE THESE BEEN SET AS THEY HAVE?

The Fund recognises the challenge to all employers in collating and submitting this information. We anticipate, however, that regulatory deadlines are likely be imposed on pension funds to complete the review. With this in mind, timescales have been set in order to build in time to deal with errors.

## FUNDING IMPLICATIONS

### WHAT ALLOWANCE WAS MADE FOR THE MCCLLOUD/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 MCCLLOUD. 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 MCCLLOUD 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, therefore any financial impacts will be factored into the next valuation.

### WILL EARLY RETIREMENT COSTINGS BE REVISITED WITH RESPECT TO RETIREMENTS THAT HAVE ALREADY TAKEN PLACE, AND ANY ADDITIONAL COSTS INVOICED TO THE EMPLOYER?

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.

Invoices will not be issued for additional costs as a result of the McCloud remedy where benefits are increased with any variations being addressed at the next actuarial valuation in 2022 where possible.

## ACADEMIES

### WHERE AN ACADEMY HAS MOVED TRUSTS SINCE 1<sup>ST</sup> APRIL 2014, WHO IS RESPONSIBLE FOR SUBMITTING THE DATA RELATING TO THE PERIOD WHEN THEY WERE PART OF THE PREVIOUS TRUST?

The current trust/employer is responsible for submitting the files via Employer Hub, so the academy affected will be required to liaise with its former trust/s and compile all data for submission at the same time.

### WHERE A SCHOOL CONVERTED TO ACADEMY STATUS AFTER 1<sup>ST</sup> APRIL 2014 WHAT DATA NEEDS TO BE SUBMITTED BY THE ACADEMY?

The academy must only submit member data for the period after the conversion. Any relevant data prior to conversion will be submitted by the relevant Local Education Authority.

### IF AN ACADEMY HAS LEFT A TRUST AND MOVED TO ANOTHER TRUST (INCLUDING AS A RESULT OF LIQUIDATION) WITHIN THE PERIOD, WHO IS RESPONSIBLE FOR SUBMITTING THE DATA PRIOR TO THE MOVE?

- If the academy retained the same employer number at the time of moving to the new trust, then the new/current trust should submit the data for the entire period. Where it does not have access to the data, we advise liaising with the previous trust ASAP.
- If the academy received a new employer number at the time of moving to the new trust, then the old trust must submit the data for the relevant period.

### AS A MULTI ACADEMY TRUST DO I NEED TO UPLOAD SEPARATE FILES PER ACADEMY OR ALL ON ONE TEMPLATE?

One file must be uploaded per employer record is so if your academies each have a separate employer record with the Fund, a file will be required for each academy.

## TUPE AND MERGERS

### **TUPE: WHERE THE EMPLOYEES OF MY ORGANISATION HAVE PREVIOUSLY BEEN EMPLOYED ELSEWHERE AND WERE SUBJECT TO TUPE WHEN THE CONTRACT MOVED TO US, WHO WILL NEED TO PROVIDE THE DATA FOR THE STAFF EMPLOYED UP TO THE DATE THEY WERE TUPE'D OVER?**

You are only required to submit data for the period the employees began working for your organisation. Any period of membership prior to the TUPE date will need to be submitted by the previous employer.

### **MY ORGANISATION WAS AWARDED A CONTRACT BY ANOTHER SCHEME EMPLOYER WHICH RESULTED IN A TUPE OF MEMBERS FROM A PREVIOUS SCHEME EMPLOYER - WHO IS RESPONSIBLE FOR THE McCLOUD DATA SUBMISSION?**

The current employer awarded the contract is only responsible for the data back to the period when the contract commenced.

### **MY ORGANISATION ABSORBED, OR WAS MERGED WITH, AN ORGANISATION THAT WAS ANOTHER SCHEME EMPLOYER. THE MEMBERS TUPE'D TO MY ORGANISATION - WHO IS RESPONSIBLE FOR THE DATA PRIOR TO THE TRANSITION?**

If the new organisation absorbed the company and the previous organisation effectively does not exist any longer then you are responsible as the current employer. If the data was not transferred to you at the time of the merge, please contact the WMPF McCloud Team on [wmpfmcloud@wolverhampton.gov.uk](mailto:wmpfmcloud@wolverhampton.gov.uk).

### **DO I NEED TO INCLUDE MEMBER DATA FOR EMPLOYEES WHO TUPE'D IN EITHER ON, OR AFTER, 1<sup>ST</sup> APRIL 2021?**

Data for members who TUPE transferred to your organisation on or after 1<sup>st</sup> April 2021 will not be required in this submission. Data for the period 2021/22 will be required by 30<sup>th</sup> September 2022.

## SUPPORT TOOLS

### CAN THE FUND PROVIDE ME WITH A LIST OF MEMBERS THEY BELIEVE I NEED TO SUBMIT DATA FOR?

A new SSRS report has been made available on Employer Hub – McCloud Post 14 Service Member Extract. The output of the report is for use as a guide only to assist with identification of the employees that need to be included in the McCloud Hours data template. Guidance on how to access the extract can be found [here](#).

### DOES THE POST 2014 SSRS EXTRACT ON THE EMPLOYER HUB CONFIRM ALL THE MEMBERS FOR WHOM THIS NEEDS TO BE COMPLETED?

The extract is intended as a guide only. There are scenarios that may result in a member who you need to include on the data template being omitted from the report. Please refer to the [online guidance](#) for more details on this.

### IS THERE A RECORDING OF THE WEBINAR SHOWING THE PROCESS FOR UPLOAD ON THE EMPLOYER HUB?

This has been circulated to all employers. If you require a further copy, please email [WMPFmccloud@wolverhampton.gov.uk](mailto:WMPFmccloud@wolverhampton.gov.uk) to request the link.

## 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 [WMPFmcccloud@wolverhampton.gov.uk](mailto:WMPFmcccloud@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 HOURS 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 on the monthly data file 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?

Whilst we await further guidance from the Scheme Advisory Board regarding the collation of McCloud data for terminated employer contracts, you may wish to begin collating this data in advance. You will, however, not be permitted to submit McCloud data for any terminated employer contracts via the Employer Hub. Please email [wmpfmcccloud@wolverhampton.gov.uk](mailto:wmpfmcccloud@wolverhampton.gov.uk) if you are in a position to submit your McCloud data against terminated employer contracts, or if you require a copy of the McCloud Post 14 Service extract for any terminated contracts to assist with the collation of data.

### 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. Alternatively, please contact the WMPF McCloud team on [WMPFmcccloud@wolverhampton.gov.uk](mailto:WMPFmcccloud@wolverhampton.gov.uk).

### ONE OF MY PREVIOUS PAYROLL PROVIDERS WON'T GIVE ME THE INFORMATION I NEED WHAT SHALL I DO?

It is our understanding that this data should have been provided to you at the date the contact ended. Initially we would ask that you attempt to obtain this once again from the payroll provider explaining that this information is required to comply with legislative changes and as the employer you are legally required to provide the administering authority with the information it needs to calculate member benefits.

If you continue to have issues, please contact the WMPF McCloud team on [WMPFmcccloud@wolverhampton.gov.uk](mailto:WMPFmcccloud@wolverhampton.gov.uk).

### WILL PENSION ESTIMATES AND ANNUAL BENEFITS STATEMENTS CONFIRM A MCCLOUD CHECK HAS BEEN CARRIED OUT AND ANY CHANGES REFLECTED IN THE STATEMENTS?

It is hoped that the guidance from the Scheme Advisory Board will advise whether an underpin, as a result of McCloud, will have to be included in annual benefit calculations and estimates.

- How does furlough affect hours worked?

Our understanding is that where a member was furloughed the hours are not reduced and remain as they were at the start of the furlough period. The member and the employer pay contributions based on the actual pay received.

If the employer was not topping the furlough pay up this would be a lesser contribution than ordinarily i.e., the CARE pension earned would be less. For the final salary element, if the member was to leave having been furloughed and the final year's pay was not their best year, then they could use one of the previous two years' pay.

#### **WHERE A MEMBER HAS TRANSFERRED SERVICE FROM ANOTHER LGPS FUND HOW WILL YOU OBTAIN THIS DATA?**

The Fund will need to receive all relevant information from the transferring LGPS Fund; however, at this stage we are awaiting further guidance from the Scheme Advisory Board on how to approach such scenarios.

#### **WHAT HAPPENS WHERE A MEMBER HAS AMALGAMATED BENEFITS? HOW WILL I KNOW IF THEY ARE CAPTURED BY MCCLLOUD FOR SERVICE I AM UNABLE TO SEE?**

The Fund is requesting data for all members active on and after 1<sup>st</sup> 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.

#### **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.