

# McCloud data collection exercise

## Q&As for employers

1) Why is the McCloud data collection exercise necessary? .....	2
2) Do I have to provide the data? .....	2
3) How should I submit the data? .....	2
4) Do I have to submit the data for employees who have left? .....	2
5) Is there a deadline for submitting the data? .....	2
6) Might I be charged if I don't provide the data on time and this results in additional costs to the administering authority? .....	3
7) I am unsure how to complete the McCloud data collection template .....	3
8) Can I recharge the cost of providing the data? .....	3
9) What happens if I cannot supply the data? .....	3

### Version Control

Version 2.1 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 2 and 3.

## 1) Why is the McCloud data collection exercise necessary?

The Government has confirmed that changes will be made to all the main public service pension schemes, including the LGPS, to remove the unlawful age discrimination identified in the McCloud ruling.

In the LGPS, the Government is proposing to provide eligible younger members with a protection equal to the protection provided to older members when the Scheme was changed in 2014 (2015 Scotland and Northern Ireland). To do this, your administering authority needs to collect extra data (hours worked and service breaks) for all members. This data is needed from the date the LGPS changed in April 2014 (or 2015 Scotland and Northern Ireland) up to 31 March 2022 (or earlier if the member left active membership of the scheme or reached their 2008 Scheme NPA before that date).

## 2) Do I have to provide the data?

The data is needed to comply with legislative changes that will be made to the LGPS to remove unlawful age discrimination. We understand that some employers have continued to supply this information since the Scheme changed in 2014 (2015 in Scotland and Northern Ireland). Your administering authority will let you know what data they need. You are legally required to provide administering authorities with the information they need to calculate members' benefits.

## 3) How should I submit the data?

You should use the McCloud data collection template to collate the data relating to your employees. Please make sure you read the notes before completing it. Once you have collated your data you should upload the data file using the WMPF Employer Hub via the process confirmed to you by the Fund.

## 4) Do I have to submit the data for employees who have left?

Yes, the notes that accompany the McCloud data collection template specify that the data should be submitted for members of the LGPS from April 2014 onwards (2015 Scotland and Northern Ireland), regardless of whether they are still in employment.

## 5) Is there a deadline for submitting 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 12<sup>th</sup> November 2021**

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

The Fund will continue to collect this data post 31<sup>st</sup> 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 hour changes and service breaks are to be collected going forward will follow in the future.

## **6) Might I be charged if I don't provide the data on time and this results in additional costs to the administering authority?**

Expectations and measurements regarding the requirements for employers with respect to the collection of data following the McCloud judgment have been incorporated into the 2021 WMPF Pension Administration Strategy including a provision for charges to be applied where data is submitted late and/or where additional costs are incurred by WMPF as a result of employer non-compliance.

## **7) I am unsure how to complete the McCloud data collection template?**

You should read the notes that accompany the McCloud data collection template to help resolve your questions. If after reading the notes you are still unsure, please email **the WMPF McCloud Team** with your enquiry:

[WMPFmccloud@wolverhampton.gov.uk](mailto:WMPFmccloud@wolverhampton.gov.uk)

## **8) Can I recharge the cost of providing the data?**

No, you are legally required to provide administering authorities with the data needed to calculate pension benefits.

## **9) What happens if I cannot supply the data?**

You are legally required to provide administering authorities with the data needed to calculate pension benefits. If you are experiencing difficulties with this, contact [WMPFmccloud@wolverhampton.gov.uk](mailto:WMPFmccloud@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.