

# McCloud data collection exercise

## Q&As for employers

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## **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. To do this, your Hampshire Pension Services 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 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. Hampshire Pension Services 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:

- Ensure that the declaration of submission is signed off by the Scheme Employer (this must be a contact known to Hampshire Pension Services and should not be signed off by a payroll provider)
- Email the completed data collection template to [pensions.eoy@hants.gov.uk](mailto:pensions.eoy@hants.gov.uk)

## **4) Is there a deadline for submitting the data?**

Yes, we require completed McCloud data collections signed off by Employers (not payroll providers), by:

- Data from 1<sup>st</sup> April 2014 to 31<sup>st</sup> March 2020 – Deadline is: 31<sup>st</sup> March 2021
- Data from 1<sup>st</sup> April 2020 to 31<sup>st</sup> March 2021 – Deadline is 30<sup>th</sup> June 2021

The deadlines above are to allow time for any hour changes or breaks of absence in the final year to be recorded and reported on payroll systems. If this will not be an

issue for you and you would prefer to provide one full data submission, this is fine too, however the data will need to be submitted by 31<sup>st</sup> March 2021.

Please note that the deadline for the data for the period 01/04/2021 to 31/03/2022 will be sent at a later date, but likely to be in line with the 2022 annual return submission.

### **5) What if the data is pulled from different sources, do I need to provide different submissions**

This is likely to be the case if you have changed payroll provider since 1<sup>st</sup> April 2014.

Hampshire Pension Services are happy to accept separate data collection spreadsheets, however you should make it clear on your declaration the period that this covers. Please send separate spreadsheets in one email wherever possible to avoid confusion and/or further queries.

### **6) 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, regardless of whether they are still in employment.

### **7) What about employees who have bought an Additional Pension Contribution (APC) contract do I need to include them on the service break tab**

Yes, the notes that accompany the McCloud data collection template detail the requirements for this. If you are unable to identify whether the member elected and paid back the lost pension in full through an APC, please leave this as blank and we will review this further and advise.

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

We hope this will not be necessary and that employers will provide this information on time. Employers should be aware of the impact this will have on their employees who may be worse off by not having the correct data on their pension record, especially as many of the members affected are low paid, part-time workers.

Under West Sussex Pension Funds [Administration Strategy](#) the administering authority will give written notice to Scheme employers if additional or disproportionate resources are required from the Pensions Team, because of an employer's poor performance, the cost of the additional resources will be recharged to the employer.

### **9) 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 [pensions.eoy@hants.gov.uk](mailto:pensions.eoy@hants.gov.uk)

### **10) 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.

### **11) 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 the data required is with a previous payroll provider, you should contact them to have discussions on how they can provide you with the data that you need to fulfil your obligations. If you are experiencing difficulties with this, please contact [pensions.eoy@hants.gov.uk](mailto:pensions.eoy@hants.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.

In the event that the data no longer exists and you are genuinely unable to backfill, we will await further advice from MHCLG.