



# Royal College of Midwives

## **The Royal College of Midwives response to the Department of Health and Social Care consultation on proposed amendments to NHS Pension Scheme regulations to continue the suspension of restrictions on return to work introduced by section 45 of the Coronavirus Act.**

The Royal College of Midwives (RCM) is the trade union and professional organisation that represents the vast majority of practising midwives in the UK. It is the only such organisation run by midwives for midwives. The RCM is the voice of midwifery, providing excellence in representation, professional leadership, education and influence for and on behalf of midwives. We actively support and campaign for improvements to maternity services and provide professional leadership for one of the most established clinical disciplines. The RCM welcomes the opportunity to respond to this consultation and our views are set out below.

The RCM strongly agrees that the temporary pension easements currently provided by section 45 of the Coronavirus Act should be continued beyond the planned expiry of the Act from 25 March 2022. As outlined in our letter of 21 January 2022 to the Secretary of State for Health and Social Care the temporary suspension of these rules has assisted the NHS greatly in helping to keep services open and functioning. That will be much harder when the rules are reintroduced and, once again, retired midwives are actively discouraged from returning, where possible, to the NHS frontline. Given this, a delay in their reintroduction would be helpful in keeping NHS services running during this time of continuing pressure.

We disagree that the continuation of the easements until 31 October 2022 is a reasonable length of time. The RCM suggests that the current arrangements are extended for at least a further twelve months. The NHS in England is short of the equivalent of around 2,000 full-time midwives, as a DHSC-minister told the Commons Health and Social Care Committee last year. Since then, midwife numbers have fallen, and since last summer have started to fall year-on-year, for the first time on record.

To both retain and recruit staff in maternity services the RCM believes that a decent pay award, better access to flexible working, prevention of burnout of staff by limiting excess hours, use of recruitment and retention premia to target posts and areas with the greatest shortages and prioritisation of the health and wellbeing of maternity staff are required. However the continuation of the suspension of restrictions on return to work is an important short-term measure which the Government can take to ease staff shortages; it enables and encourages retired midwives to return to work in the NHS.

The RCM does not therefore believe that six months is a sufficient timeline by which the staff shortages in maternity services can be addressed.