



Royal College of Midwives response to the Department of Health and Social Care Consultation: NHS Pension Scheme: proposed amendments to scheme regulations

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's response focuses on questions 1 and 5 of the consultation document as these are the areas that most impact on midwives and MSWs. The RCM has also responded as a member of the NHS Pension Scheme Advisory Board (SAB) which covers England and Wales.

Do you agree or disagree that the new retirement flexibilities should be introduced as proposed in this consultation document?

The RCM agrees that the new retirement flexibilities should be introduced as proposed in this consultation document. In our responses last year to proposals to extend the temporary pension easements currently provided by modifications to NHS Pension Scheme regulations made by Part 3 of the National Health Service Pension Schemes (Member Contributions etc.) (Amendment) Regulations 2022 we outlined how the temporary suspension of these rules has assisted the NHS greatly in helping to keep services open and functioning.

The proposals in this consultation can contribute in part to the retention of midwives and MSWs at a time when the maternity services workforce is in crisis and the shortage of midwives is worsening. Experienced midwives and MSWs can contribute greatly to the safe running of maternity services. Midwives aged 55+ make up a significant and growing section of the midwifery workforce, in 2015 14% of midwives in England were aged 55+, in 2022 this figure had increased to 17%.

The RCM believe that alongside retirement flexibilities to both retain and recruit staff in maternity services decent pay, 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. The proposed measures however are an important measure which may help to ease staff shortages enabling and encouraging those are retirement age to continue working in the NHS.

We note that under the proposal, members with special class status (SCS) would still be subject to abatement until age 60 under normal circumstances, the RCM welcomed the current suspension of abatement until 31 March 2025 it is the RCM's position that these rules should be abolished.



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Are there any further considerations and evidence that you think DHSC should take into account when assessing any equality issues arising as a result of the proposed changes?

The RCM supports the SAB position that clear communication will be required to help members of the scheme understand the new pension flexibilities and how they can be applied to individuals. Clear, accessible, plain English communication is crucial for raising awareness and education. This could include:

- Training sessions in a variety of formats e.g. face to face, online etc.
- Communication to deferred members and those who have left the NHS Pension Scheme, who may be interested in the changes.
- Resources to ensure managers are confident speaking to staff about the changes.
- Guidance for scheme members, line managers, HR and finance departments

Changes to pensions are often complicated for members of the scheme to understand and the timing and interaction of the changes with the McCloud remedy for members may create further confusion. Clear communication is essential to raise awareness, education and in the successful implementation of the changes.