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**27<sup>th</sup> January 2023**

**To the NHS Pensions Policy Team**

**Response to the Department of Health and Social Care consultation:  
[NHS Pension Scheme: proposed amendments to scheme regulations](#)**

The Royal College of Paediatrics and Child Health (RCPCH) is the membership body for paediatricians in the UK and around the world. With around 20,000 members in the UK and internationally, we play a major role in workforce planning, professional standards, research and policy.

Rapidly increasing waiting times and A&E demand have placed considerable strain on paediatric services in the UK. There are now [100,000 more children waiting to be seen by a consultant than there were a year ago](#). The number of children and young people in the queue for care and treatment has soared to more than **350,000, the highest on record**, with [almost 2,000 children waiting over a year](#) to be seen.

Given this escalating pressure on services, it is vital that the paediatric workforce is adequately staffed to ensure provision of high-quality care for children and young people. However, the rising and unpredictable pension-related tax burden is forcing senior paediatric clinicians to either scale back their existing workload or take early retirement. The recent [RCPCH Workforce Census](#), for example, demonstrated that **75% of respondents predicted that they would retire before the age of 64**. This indicates a sharp drop in senior paediatric workforce numbers over the next twenty years. Further still, in a survey of RCPCH members, [59% of respondents believe that pension-related tax bills](#) have led to a reduction in paediatric services and **79% are likely to retire earlier** because of this issue.

This is of particular concern for the paediatric workforce where **the service is heavily reliant on senior clinicians and specialist expertise**. Moreover, increasing drop-off of senior clinical staff may cause a **'ripple effect' on the emerging, younger workforce** in terms of both retirement plans and availability of training and mentorship. Postgraduate doctors in training may be discouraged from remaining in the NHS and seek job opportunities outside the UK or in the private sector, while senior clinicians may be deterred from accepting remunerated leadership roles for fear of punitive taxation on a hypothetical pension rise.

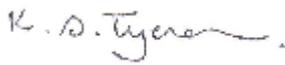
Amendments to the NHS pension scheme that encourage paediatric workforce retention are welcomed. The **partial retirement option** and **greater flexibility** for recently retired doctors returning to the workforce have potential benefits and will standardise retire and return arrangements.

However, the amendments proposed do not directly address the issues caused by the annual or lifetime allowance and our **members will continue to face**

**exceptionally high tax bills** potentially leading to drastic reductions in the mid-career and senior paediatric workforce.

The RCPCH strongly recommends a resolution that safeguards the current paediatric workforce and encourages senior clinicians, in particular to remain in post at full working capacity without incurring large punitive tax bills. Tackling the issue of pension taxation is necessary in alleviating the growing workforce pressures within the NHS and improving the overall morale. We support a reform of the pension arrangements so that doctors are fully supported to deliver high quality patient care.

Yours Faithfully,

A handwritten signature in blue ink, appearing to read 'K. D. Tyerman'.

Dr. Kay Tyerman  
RCPCH Officer for Workforce Planning