



Shona Robison MSP
Cabinet Secretary for Finance and Local Government
Scottish Government
St Andrew's House
Regent Road
Edinburgh
EH1 3DG
(via email to CabSecFLG@gov.scot)

5 September 2025

Dear Shona,

Tackling the Gender Gap in Scottish Public Service Pension Schemes

I am writing to make you aware of the unacceptable levels of gender inequality in Scottish public service pension schemes and to ask you to take action to address it.

I am copying this letter to the Scottish Secretaries at Unison, Unite and the GMB, as well as to Roz Foyer, General Secretary of the STUC.

The overall Gender Pension Gap in Scotland

It is possible to define the gender pension gap in different ways; Prospect publishes an annual report that includes estimates of the gap based on the following definition:

“The percentage difference in average gross pension income for women receiving the state pension, compared to the average gross pension income for men receiving state pension.”

Under this definition, our latest report¹ showed that the UK's gender pension gap was 36.5% in 2022-23 (the latest year data is available for).

I asked colleagues in Prospect's Research team to calculate an estimate for the overall gender pension gap in Scotland in 2022-23, and they found it was 34.7%.

While this is slightly lower than the gap across the UK, I know you will agree it is unacceptably high and that we all have a duty to consider what we can do to reduce it.

¹ [7th Annual Gender Pension Gap Report, July 2025](#)

The Gender Pension Gap in the Local Government Pension Scheme (Scotland)

One of the main levers available to Scottish Ministers for tackling the gender pension gap is through the rules of the schemes for Scottish public servants that it manages.

As Cabinet Secretary for Public Finance and Local Government you have responsibility for the Local Government Pension Scheme (Scotland) (LGPS Scotland).

The data report for the 2020 actuarial valuation of the scheme² showed that it had a gender gap in pension income of 45.5%, much higher than Scotland's overall gap.

While there are many causes of this inequality, a significant factor is the impact of caring responsibilities: women are more likely to accrue less pension due to time out of paid work and / or part-time working because they are looking after young children or older relatives.

If the rules of LGPS Scotland better reflected the working lives of women (and also some men) with caring responsibilities, this would directly impact more than 250,000 active scheme members and make a material difference to Scotland's gender pension gap.

Consultation on Measures to Promote Gender Equality in LGPS (England and Wales)

In considering possible changes to LGPS Scotland regulations that would begin to address the stark gender inequality shown in the data above, we have the great advantage of being able to learn from work already done by the LGPS England and Wales.

In January 2023 the Scheme Advisory Board (SAB) of LGPS England and Wales published a gender pension analysis³ they had commissioned from the Government Actuary's Department (GAD).

This analysis found that the gender gap in the scheme emerged when members were in their mid- to late-twenties, which "is consistent with the extensive body of published research on the gender pay gap, which highlights gender disparities in the allocation of childcare responsibilities as a key underlying factor."

A letter⁴ from Chair of the SAB to the then Chief Secretary to the Treasury in the UK government set that report in the context of the overall work the SAB was doing to tackle the gender gap in its scheme.

This ultimately led to the inclusion of specific proposals to change scheme regulations to deal with the impact of caring responsibilities on pension entitlement in a consultation⁵ published on 15 May.

The proposals intended to address the gender pension gap were:

- (1) Making authorised unpaid absences under 31 days automatically pensionable. Authorised unpaid absences (eg to look after a child who is too sick to attend school) are mostly taken by women, making them automatically pensionable will reduce the gender pension gap.
- (2) Making unpaid statutory parental leave pensionable. Most public sector employers participating in the LGPS England and Wales only pay employees on maternity/ adoption/shared parental leave for the first 39 weeks of the 52 weeks of statutory

² Slide 21 of 45:

https://assets.publishing.service.gov.uk/media/66226e3d49d7b8813ba7e574/LGPS_Scotland_2020_Valuation_Data_Report.pdf

³ https://lgpsboard.org/images/Reports/2023/GADGenderPensionGapReport_Jan2023.pdf

⁴ [17052024_LettertoLauraTrottMPfromCllrPhillips_GPG.pdf](#)

⁵ [Local Government Pension Scheme in England and Wales: Access and fairness - GOV.UK](#)

leave. The paid statutory parental leave is pensionable, but currently the remaining 13 weeks unpaid statutory leave are not. Making unpaid statutory parental leave pensionable in the scheme will directly tackle the gender pension gap.

- (3) Making it easier for scheme members with an unpaid break of more than 30 days to buy back any pension lost during that time. A welcome feature of this scheme is the ability of members who had an unpaid break of more than 30 days to buy back pension they missed out on. If they apply for this within 30 days of returning to work the employer must contribute 2/3rds of the cost. The consultation includes a proposal to give members up to a year after returning to apply for this without losing out on the employer support. The consultation also proposed to change the way the cost of buying back the pension is calculated that should make it cheaper for female members. Together these changes should greatly increase uptake of this option and reduce the gender pension gap.
- (4) Mandatory gender pension gap reporting. This proposal involves gathering data to understand the gap better, and to encourage employers to focus on the factors that may be contributing to it.

Together, the above proposals probably represent the most significant progress in tackling the gender pension gap in recent years (despite only applying to members of one scheme).

These advances do not necessarily come at a prohibitive cost. For example, GAD estimated the cost of making unpaid statutory parental leave pensionable at under £1 million per year. The cost for the Scottish scheme would be a fraction of that.

I urge you to request similar analysis from GAD for LGPS Scotland, with a view to consulting on proposals to tackle the gender pension gap in this scheme before the next Scottish Parliament election.

Measures to Promote Gender Equality in Other Scottish Public Service Schemes

The latest valuation data also shows large gender gaps in pension income in other large schemes for Scottish public servants:

- NHS Pension Scheme Scotland⁶: 55.7%
- Teachers' Pension Scheme Scotland⁷: 24.2%

I understand that these schemes come under different ministers (and that agreement with HM Treasury is required before regulations can be made for them), but I would urge you to raise this issue, and the suggested actions, with the relevant ministers.

Summary

The gender pension gap in Scotland is far too high and the detrimental impact on women in retirement here is unacceptable. Scottish Ministers are quite limited in what they can do about this problem because most pension policy is reserved. But as scheme managers of large occupational pension schemes, you have the power to make a real difference, and I would urge you to take up the proposals in this letter.

⁶ [NHS Pension Schemes \(Scotland\) Actuarial Valuation as at 31 March 2020 - Membership Data](#)

⁷

https://assets.publishing.service.gov.uk/media/660d351775831500114a4978/Teachers_Scotland_2020_Valuation_Data_Report.pdf

Yours sincerely

A handwritten signature in black ink, appearing to be 'Richard Hardy', with a stylized, sweeping flourish at the end.

Richard Hardy
National Secretary

Copy to:

Roz Foyer, General Secretary STUC
Susan Fitzgerald, Unite
Lilian Macer, Unison
Louise Gilmour, GMB