

## National Health Service Superannuation Scheme Consultation - Employee Contribution Increase

### 1. Author(s) of Paper

Jan Lyell, Head of Corporate Affairs  
Tel: 0131 275 6449  
Email: [jlyell@nhs.net](mailto:jlyell@nhs.net)

### 2. Purpose of Paper

To inform the Board of the consultation by the Scottish Public Pensions Agency on proposed increases to NHS employee contribution rates effective from April 2011 for the year 2012/13.

### 3. Service Implications

The First Minister's letter at Appendix 1, which was circulated to all staff in October, explains that the UK Government has decided to increase pension contributions for public sector workers from April 2012 with the intention of raising £2.8 billion by April 2015.

The Scottish Public Pensions Agency has issued a consultation (Appendix 2) on the proposed increases to NHS employee contribution rates effective from April 2011 for the year 2012/13.

### 4. Key Considerations

- The proposed new rates are:
  - Those earning less than £15,000 (full-time equivalent rate) will pay nothing extra;
  - Those earning up to £26,557 (full-time equivalent rate) will pay no more than 0.6% of pay extra in 2012/13 (before tax relief);
  - Higher earners will pay extra, but no more than 2.4% of pay in 2012/13 (before tax relief).
- The consultation relates to increases for the year 2012/13 only. The Scottish Government has signalled its intent to consult on proposals for potential second and third year increases at a later date. The UK Government's intention is that public sector workers should pay an average of 3.2% more for their pensions by April 2014.
- Unions across the public sector, including NHSScotland, are balloting their membership on industrial action which, if voted for by the membership, is likely to start on 30 November 2011.

- New arrangements for the NHS Pension scheme were introduced on 1st April 2008. The new 2008 section has a normal pension age of 65 years. During 2010, through the NHS Pension Choice exercise, existing members had the option to transfer to the new 2008 section and convert all of their existing service to pensionable service in the new 2008 section.

**5. Resource Implications**

No additional resource requirements identified at this stage.

**6. Contracts**

N/A

**7. Risk Implications**

**Business Risk**

There is a risk of service disruption due to either direct industrial action or the indirect effect of industrial action in other parts of the public sector, e.g. school closures. Mitigating actions: Business continuity plans for essential services are being reviewed in partnership.

**Staff Risk**

There is a risk that superannuation contribution increases at a time of pay restraint and rising inflation will result in loss of staff motivation.

Mitigating actions: NSS will continue to engage with staff and ensure that they have access to available information.

**8. Equality & Diversity Implications**

N/A

**9. Partnership Working**

The proposed changes were discussed at the NSS Partnership Forum on 18<sup>th</sup> October. The NSS response to the consultation will be discussed at the Partnership Forum on 15<sup>th</sup> November, prior to the consultation deadline of 17<sup>th</sup> November 2011.

4 October 2011

Dear Colleague

### **Public Sector Pensions**

I am writing to set out the way in which we are handling the first phase of the UK Government's pension reform agenda and to explain the reasons behind it.

The UK Government has decided to increase pension contributions for public sector workers from April 2012. They intend to raise £2.8 Billion by this means across the UK by April 2015. This equates to an average increase in pension contributions of 3.2% of salary.

Public sector workers are entitled to pensions that are affordable, sustainable, and fair both to workers and to taxpayers. We are strongly opposed in principle to the UK Government's policy of increasing contributions. At a time of pay freezes, significant increases in national insurance contributions, higher VAT, rising inflation and fuel costs, we believe it is wrong to require public servants to have to increase their pension contributions.

The UK Government has made it crystal clear that if we do not implement the increase in pension contributions then they will reduce the amount of money in the Scottish Budget. This applies to everyone in the Scottish NHS, Teachers, Police and Fire pension schemes. The impact of that would be to reduce the Scottish Budget by over £100m in 2012-13 and by more than £550 million over the next three years. This would have an immediate, significant and detrimental impact on public services and the size of the public sector workforce.

We will continue to argue for the UK Government to change its course. But given the fact that we face a deduction to our funding in April 2012 by the UK Government if we do not act, we have no option other than to commence a consultation exercise to determine how the increase in contributions are implemented across these four pension schemes. We do this with great reluctance.

We will be issuing our consultation for the NHS, Teachers, Police and Fire schemes later this week. These will set out proposed member contribution increases for 2012-13 only. We will consult on proposals for potential second and third year increases at a later date. We are

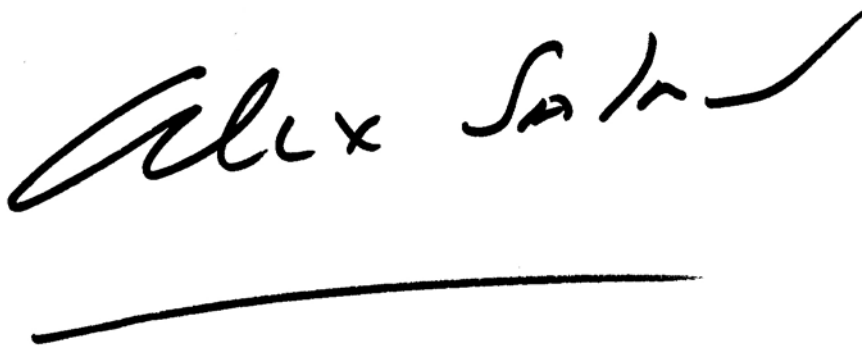
committed to genuine engagement with all our stakeholders on these proposals and I would encourage you to contribute actively to that process.

The responsibility for civil service pensions is reserved to the UK Government. They have already announced a consultation on the application of this policy for all civil servants including those working in Scotland.

We are extremely aware of the challenges faced by public sector workers during these difficult times. We are taking a number of positive steps to address these. In light of the UK Government's decision on pensions, the Scottish Government has given an agreement to extend our existing no compulsory redundancies policies for a further year for the bodies which are covered by the public sector pay policy, subject to the agreement of flexibilities which protect workforce numbers. We have also extended our commitment to pay the increased Scottish Living Wage of £7.20 an hour to all staff under the Scottish Government's responsibility in the same period, and in the pensions discussions we will do all in our power to protect the position of the low-paid.

I deeply regret that this action has been forced upon us. Scotland is very proud of the dedication and professionalism of its public sector workforce. I know that, irrespective of your views on this issue, you will continue to focus on doing what you do best – delivering world class services to the people of Scotland.

Yours for Scotland.

A handwritten signature in black ink that reads "Alex Salmond". The signature is written in a cursive, flowing style. Below the signature is a thick, horizontal black line that spans most of the width of the signature.

**ALEX SALMOND**

To: NHS Consultees

7 Tweedside Park  
Tweedbank  
GALASHIELS  
TD1 3TE

[www.sppa.gov.uk](http://www.sppa.gov.uk)

Tel: 01896 892471  
Fax: 01896 893214  
[nhspensionsreform@scotland.gsi.gov.uk](mailto:nhspensionsreform@scotland.gsi.gov.uk)

7 October 2011

Dear Colleague

## **National Health Service Superannuation Scheme Consultation – Employee contribution increases**

In his address to Parliament on 21 September on the Scottish Spending Review 2011, the Cabinet Secretary for Finance, Employment and Sustainable Growth, John Swinney, announced the Scottish Government's decision to reluctantly apply employee contribution increases for the NHS, Teachers', Police and Firefighters' schemes in Scotland.

Attached is a copy of the consultation on proposed increases to employee contribution rates effective from April 2012 for the National Health Service Superannuation Scheme in Scotland. Responses should be sent by email to: [nhspensionsreform@scotland.gsi.gov.uk](mailto:nhspensionsreform@scotland.gsi.gov.uk) or sent to the following address no later than 17 November 2011:

NHS Pensions Reform  
Policy Branch  
SPPA  
7 Tweedside Park  
Tweedbank  
Galashiels  
TD1 3TE

A copy of the consultation documentation is also available on the Agency's website at [www.sppa.gov.uk/nhs/consultations](http://www.sppa.gov.uk/nhs/consultations)

Your faithfully



Chad Dawtry  
Director of Policy  
SPPA



# **NHS SUPERANNUATION SCHEME (SCOTLAND)**

## **CONSULTATION ON PROPOSED INCREASES TO EMPLOYEE CONTRIBUTION RATES EFFECTIVE FROM APRIL 2012**

### **1. Purpose**

This is a consultation by the Scottish Government on proposals for potential increases in the level of contributions scheme members will be required to make to the National Health Service Superannuation Scheme in Scotland from 1 April 2012.

This consultation will run for six weeks, from 7 October 2011 to 17 November 2011. The Scottish Government invites views on the proposals contained in this document; the questions it poses; and related issues which consultees believe should have a bearing on the implementation of these proposals.

The Scottish Government will continue to discuss the proposals outlined in this document with members of the Scottish Terms and Conditions Committee and with the Scottish Pensions Group - the partnership groups representing employers, staff and Scottish Government interests which advise the Scottish Government on matters concerning the National Health Service Superannuation Scheme in Scotland.

### **2. Background**

Occupational pensions policy is reserved to Westminster. The UK Government is committed to a programme of reform of public service pensions, which draws on conclusions and recommendations made by Lord Hutton of Furness in his independent review of public service pension schemes commissioned by the Chancellor of the Exchequer in June 2010. The UK Government has made it clear that it expects its proposals to apply to public service schemes across the UK, including those in Scotland.

Broadly, the UK Government's proposed reforms incorporate:

- ◆ increases in the amount public servants will be required to pay towards their pensions from April 2012; and
- ◆ longer-term reforms to redesign the content and governance of public service pension schemes, which are expected to apply from April 2015.

**This consultation is solely concerned with the first of these proposed reforms – increases in employee contribution rates which might apply to the NHS Superannuation Scheme in Scotland.**

The UK Government has made clear its intention that public sector workers should pay an average of 3.2% of pay more for their pensions by April 2014. It intends to introduce increases progressively – so that lower paid workers receive some protection and higher earners pay proportionately more for their pensions. It also intends to introduce these increases in three increments: 40% from April 2012; a further 40% from April 2013 and the final 20% from April 2014.

**This consultation concerns the increases which might apply from April 2012 for the NHS Superannuation Scheme in Scotland only.**

In due course, the Scottish Government will consult on proposals for potential second and third year increases and on any proposals for longer-term reforms of public sector pension schemes in Scotland.

### **3. The Scottish Government's position on employee contribution rate increases**

The Scottish Government remains committed to public service pension schemes that are affordable, sustainable and fair for public service workers and taxpayers alike. It recognises the importance of ensuring that those who have devoted their working life to public service are able to enjoy good quality pensions in retirement alongside its role of ensuring that public finances are used constructively and for the good of Scotland's communities.

Against that context, the Scottish Government has made it very clear that at a time of pay constraint and pressure on household finances - and in the absence of clear evidence of immediate need – the UK Government's policy of increasing employee contributions is unwarranted and disruptive.

However, despite repeated representations to the UK Government to allow a different course of action to be taken in Scotland, Her Majesty's Treasury has reiterated its intention that, should increases not be applied in Scotland, the Scottish budget will be reduced by £8.4 million per month.

Such a reduction would reduce the level of public sector employment and run contrary to the direction of the Scottish Government's employment policy. In light of the UK Government's position, the Scottish Government has concluded that, regrettably, it has no choice other than to apply the increases in employee pension contributions the UK Government has proposed from April 2012 unless it can persuade the UK Government to change direction.

## 4. Principles

The Scottish Government takes its commitment to affordability, sustainability and fairness in public sector pension deals seriously. In developing the range of proposed increases, it has therefore paid considerable attention to protecting the low paid; minimising the risk of opt outs from the scheme; and ensuring that the additional burdens fall on those with the greatest ability to meet them, so that higher paid members pay proportionately more.

Our proposals on protection include:

- ♦ reinforcing the importance the Scottish Government attaches to the Scottish Living Wage, by ensuring that full time scheme members earning less than £15,000 a year will face no increases at all;
- ♦ offering partial protection to the newest members of the scheme to reduce the risk of opt-out.

Additionally, the Scottish Government is aiming to ensure that no-one in Scotland pays higher levels of contributions than their UK counterparts.

In these ways, the Scottish Government is endeavouring to make these changes as fair as possible.

As a starting point, the rates set out in this document are those which are currently being consulted upon for the NHS Pension Scheme in England and Wales. We welcome consultees' views on how appropriate these rates will be in the context of the requirement to deliver the overall level of savings required by the UK Government.

## 5. Increase of contributions in 2012-13

The NHS Superannuation Scheme is an unfunded scheme underwritten by HM Treasury. It is supported by contributions from employers, who contribute the equivalent of 13.5% of a member's pensionable pay into the scheme and by employees who contribute between 5% and 8.5% of their pensionable pay depending on their full time equivalent earnings. The current rates are shown in column two of Table 1, below.

The Scottish Government's proposed new rates are set out in column three of Table 1 and show that:

- Those earning less than £15,000 (full-time equivalent rate) will pay nothing extra;

- Those earning up to £26, 557 (full-time equivalent) will pay no more than 0.6% of pay extra in 2012-13 (before tax relief)
- Higher earners will pay extra, but no more than 2.4% of pay in 2012-13 (before tax relief)

Table 1: Proposed increases to contribution rates ( <b>before</b> tax relief)			
Full Time Equivalent pensionable pay	Contribution rate 2011/12	Contribution rate 2012/13	Contribution rate increase in 2012/13
Up to £15,000	5.0%	5.0%	0%
£15,001 to £21,175	5.0%	5.6%	0.6%
£21,176 to £26,557	6.5%	7.1%	0.6%
£26,558 to £48,982	6.5%	7.7%	1.2%
£48,983 to £69,931	6.5%	8.5%	2.0%
£69,932 to £110,273	7.5%	9.8%	2.3%
Over £110,273	8.5%	10.9%	2.4%

The expected overall yield from this range of increases is 1.28% of pensionable pay.

NHS Superannuation Scheme employee contributions are deducted from gross pay before income tax is deducted. As a result, pension scheme contributions normally benefit from significant tax relief. Table 2 below shows the increased contributions that individuals would actually pay having taken account of the tax relief that applies, if the increases in Table 1 were adopted.

Table 2: Contribution rates ( <b>after</b> tax relief applied)				
Full-time 2010/11 pay	Contribution rate 2011/12	Contribution rate 2012/13	Increase in contribution rate 2012/13	Additional cost (£ per month)
£10,000	4.00%	4.0%	0.0%	0
£15,000	4.00%	4.0%	0.0%	0
£20,000	4.00%	4.5%	0.5%	8
£25,000	5.20%	5.7%	0.5%	10
£30,000	5.20%	6.2%	1.0%	25
£40,000	5.20%	6.2%	1.0%	33
£60,000	3.90%	5.1%	1.2%	60
£80,000	4.50%	5.9%	1.4%	93
£130,000	5.10%	6.5%	1.4%	152

The contribution rate after tax relief is the percentage of total pay by which take-home pay is reduced, as a result of the increase to pension contributions. This shows the beneficial effect of tax relief on pension contributions.

In applying the increases in this way, we have sought to ensure that almost all newly qualified healthcare professionals earning less than £26,558 will only pay 0.6% more (before tax relief) in 2012-2013. This approach ensures a minimal impact on the ability of the NHS in Scotland to continue to recruit and retain newly qualified staff by continuing to offer a sustainable, affordable and fair public sector pension.

## **6. Examples of what this could mean for individuals**

The following are examples of how the proposed increases for 2012-13 set out above could affect individual members. As an NHS employee:

### (A) Working full-time and with pensionable pay of £15,000 a year,

In 2012-13 you would pay no extra for your pension. This means that:

- In 2012-13 you will continue to contribute 5% compared to the current employer contribution of 13.5%.
- This means that for every £1 you contribute, the employer contributes £2.70. For your overall yearly contribution of £750, your employer pays £2025.
- But because your contributions are tax free your effective contribution rate is 4%, meaning you actually contribute £600 per annum.
- If you are in the 1995 section of the pension scheme, you will receive, after you retire, a pension of £188 per year of contributing service and a tax free lump sum of £563 per year of contributing service payable at age 60
- If you are in the 2008 section of the pension scheme, you will receive, after you retire, a pension of £251 per year of contributing service, with the option to exchange some of this for a tax free lump sum, payable at age 65.

### (B) Working part-time 3 days per week, and with pensionable pay of £24,000 (full time equivalent pay of £40,000),

In 2012-13 you would contribute 7.7%, compared to the current employer contribution of 13.5%. This means that:

- for every £1 you contribute, the employer contributes £1.75 For your overall yearly contribution of £1,848, your employer will pay £3,240
- but because contributions are tax free your effective contribution rate will be 6.2%, meaning you only actually contribute £1,488 per annum.

This represents an increased personal contribution in 2012-13 of £20 per month after tax relief.

- If you are in the 1995 section of the pension scheme, you will receive, after you retire, a pension of £300 per year of contributing service and a tax free lump sum of £900 per year of contributing service payable at age 60.
- If you are in the 2008 section of the pension scheme, after you retire, you will receive a pension, of £400 per year of contributing service , with the option to exchange some of this for a tax free lump sum, payable at age 65.

(C) Working full-time and with pensionable pay of £25,000 a year

In 2012-13 you would contribute 7.1%, compared to the current employer contribution of 13.5%. This means that:

- for every £1 you contribute, the employer contributes £1.90. For your overall yearly contribution of £1,775, your employer will pay £3,375
- but because contributions are tax free your effective contribution rate will be 5.7%, meaning you actually contribute £1,425 per annum. This represents an increased personal contribution in 2012-13 of £10 per month after tax relief.
- If you are in the 1995 section of the pension scheme, you will receive, after you retire, a pension of £313 per year of contributing service and a tax free lump sum of £938 per year of contributing service payable at age 60.
- If you are in the 2008 section of the pension scheme, after you retire you will receive a pension of £417 per year of contributing service , with the option to exchange some of this for a tax free lump sum, payable at age 65.

(D) Working full-time and with pensionable pay of £30,000,

In 2012-13 you will contribute 7.7%, compared to the current employer contribution of 13.5%. This means that:

- for every £1 you contribute, the employer contributes £1.75. For your overall yearly contribution of £2,310, your employer will pay £4,050
- but because your contributions are tax free your effective contribution rate will be 6.2%, meaning you actually contribute £1,860 per annum. This represents an increased contribution in 2012-13 of £25 per month after tax relief.
- If you are in the 1995 section of the pension scheme, you will receive, after you retire, a pension of £375 per year of contributing service and a tax free lump sum of £1,125 per year of contributing service payable at age 60.

- If you are in the 2008 section of the pension scheme, you will receive, after you retire, a pension of £500 per year of contributing service , with the option to exchange some of this for a tax free lump sum, payable at age 65.

(E) Working full-time and with pensionable pay of £60,000

In 2012-13 you would contribute 8.5%, compared to the current employer contribution of 13.5%. This means that:

- for every £1 you contribute, the employer contributes £1.59. For your overall yearly contribution of £5,100, your employer will pay £8,100.
- but because contributions are tax free your effective contribution rate will be 5.1%, meaning you actually contribute £3,060 per annum. This represents an increased personal contribution in 2012-13 of £60 per month after tax relief.
- If you are in the 1995 section of the pension scheme, you will receive, after you retire, a pension of £750 per year of contributing service and a tax free lump sum of £2,250 per year of contributing service payable at age 60.
- If you are in the 2008 section of the pension scheme, you will receive, after you retire, a pension of £1,000 per year of contributing service , with the option to exchange some of this for a tax free lump sum, payable at age 65.

(F) Working full time and with pensionable pay of £130,000

In 2012-13 you would contribute 10.9%, compared to the current employer contribution of 13.5%. This means that:

- that for every £1 you contribute, the employer contributes £1.24. For your overall yearly contribution of £14,170, your employer will pay £17,550
- but because contributions are tax free, your effective contribution rate will be 6.5%, meaning you actually contribute £8,450 per annum. This represents an increased personal contribution in 2012-13 of £152 per month after tax relief.
- If you are in the 1995 section of the pension scheme you will receive, after you retire, a pension of £1,625 per year of contributing service and a tax free lump sum of £4,875 per year of contributing service payable at age 60.
- If you are in the 2008 section of the pension scheme, you will receive, after you retire, a pension of £2,167 per year of contributing service, with the option to exchange some of this for a tax free lump sum, payable at age 65.

## **7. Consultation Questions and How to Respond**

Within the context of the principles set out in section 4 above, the Scottish Government is seeking views on the preferred approach to delivering the required savings by increasing employee contributions to the Scottish NHS Superannuation scheme by the amounts set out in Table 1 and in particular;

**Question 1: Should we adopt the England and Wales proposals or adjust them to reflect circumstances in Scotland as long as these still achieve the required additional contribution yield for 2012/13?**

**Question 2: How might any Scotland specific adjustments fit with our policy of having agreed common salary scales/terms and conditions across the UK?**

**Question 3: How might any Scotland specific adjustments be set to ensure that no-one in Scotland pays higher levels of contributions than their UK counterparts?**

**Question 4: Do the proposed tiered employee contributions from April 2012 achieve the appropriate balance between:**

- **Protecting the low paid;**
- **Minimising potential opt out from the scheme;**
- **Ensuring that they are set progressively, so that higher earners pay proportionately more?**

**Question 5: Do you consider that there are any potential equality issues? For example, is there anything in the proposals that might result in individual groups being disproportionately affected by the proposed contribution tiering?**

**Question 6: Are there any other specific issues around these potential increases that you would like the Scottish Government to consider?**

A full Equality Impact Assessment evaluating the approach proposed for the Scottish NHS Superannuation Scheme in the above tables will be published in due course.

This consultation does not invite comments on the contribution rates in 2013-14 and 2014-15. This consultation concerns proposed increases relating to 2012-13 only.

The closing date for receipt of comments is **17 November 2011**.

Responses should be made by completing the Consultation Response Form at Annex A electronically at [www.sppa.gov.uk/nhs/consultations](http://www.sppa.gov.uk/nhs/consultations) and emailing to [nhspensionsreform@scotland.gsi.gov.uk](mailto:nhspensionsreform@scotland.gsi.gov.uk) or by completing the form sending to:

NHS Pensions Reform  
Policy Branch  
SPPA  
7 Tweedside Park  
Tweedbank  
Galashiels  
TD1 3TE

## **8. Next steps after the consultation ends**

The Scottish Government will respond to this consultation by publishing draft regulations which will also be the subject of further consultation. In addition, a summary of the responses to this consultation will be made available on the SPPA website.

## **9. Confidentiality of information**

We need to know how you wish your response to be handled and, in particular, whether you are happy for your response to be made public. Please complete and return the attached Consultation Response Form which forms part of the consultation questionnaire as this will ensure that we treat your response appropriately. If you ask for your response not to be published we will regard it as confidential, and we will treat it accordingly.

All respondents should be aware that the Scottish Government are subject to the provisions of the Freedom of Information (Scotland) Act 2002 and would therefore have to consider any request made to it under the Act for information relating to responses made to this consultation exercise.

# Annex A: CONSULTATION RESPONSE FORM: NHS SUPERANNUATION SCHEME SCOTLAND. CONSULTATION ON PROPOSED INCREASES TO EMPLOYEE CONTRIBUTION RATES EFFECTIVE FROM 1 APRIL 2012:

Please Note this form should be returned with your response to ensure that we handle your response appropriately. An electronic version of the form can be accessed at [www.sppa.gov.uk/nhs/consultations](http://www.sppa.gov.uk/nhs/consultations)

## 1. Name/Organisation

Organisation Name

Title

Surname

Forename

## 2. Postal Address





Postcode	Phone	
Email		

**3. Permissions - I am responding as...** (please complete either sections (a), (b) and (d) or sections (c) and (d):

**Individual** or **Group/Organisation**

**(a)** Do you agree to your response being made available to the public (in Scottish Government library and/or on the Scottish Government web site)?

Please state yes or no: \_\_\_\_\_

**(b)** Where confidentiality is not requested, we will make your responses available to the public on the following basis

Please state yes to one of the following:

Yes, make my response, name and address all available .....

or

Yes, make my response available, but not my name and address .....

or

Yes, make my response and name available, but not my address .....

**(c)** The name and address of your organisation **will be** made available to the public (in the Scottish Government library and/or on the Scottish Government web site).

Are you content for your **response** to be made available?

Please state yes or no: .....

**(d)** We will share your response internally with other Scottish Government policy teams who may be addressing the issues you discuss. They may wish to contact you again in the future, but we require your permission to do so. Are you content for Scottish Government to contact you again in relation to this consultation exercise?

Please state yes or no: .....

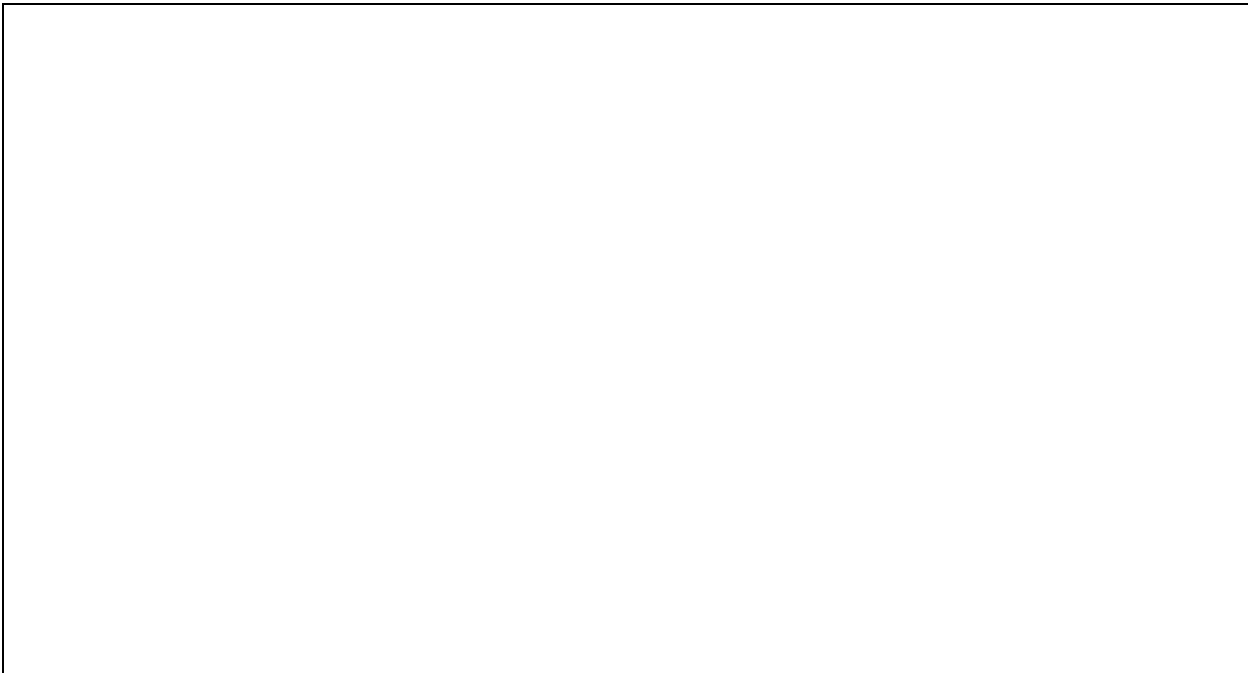
## CONSULTATION QUESTIONS – Please give reasons for your answers.

Within the context of the principles set out in the consultation document, your comments are invited on the preferred approach to delivering the required savings by increasing employee contributions to the Scottish NHS Superannuation Scheme by the amounts set out in Table 1 below.

<b>Proposed increases to contribution rates (before tax relief)</b>			
Full Time Equivalent pensionable pay	Contribution rate 2011/12	Contribution rate 2012/13	Contribution rate increase in 2012/13
Up to £15,000	5.0%	5.0%	0%
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£26,558 to £48,982	6.5%	7.7%	1.2%
£48,983 to £69,931	6.5%	8.5%	2.0%
£69,932 to £110,273	7.5%	9.8%	2.3%
Over £110,273	8.5%	10.9%	2.4%

**Question 1: Should we adopt the England and Wales proposals or adjust them to reflect circumstances in Scotland as long as these still achieve the required additional contribution yield for 2012/13?**

**Question 2: How might any Scotland specific adjustments fit with our policy of having agreed common salary scales/terms and conditions across the UK?**

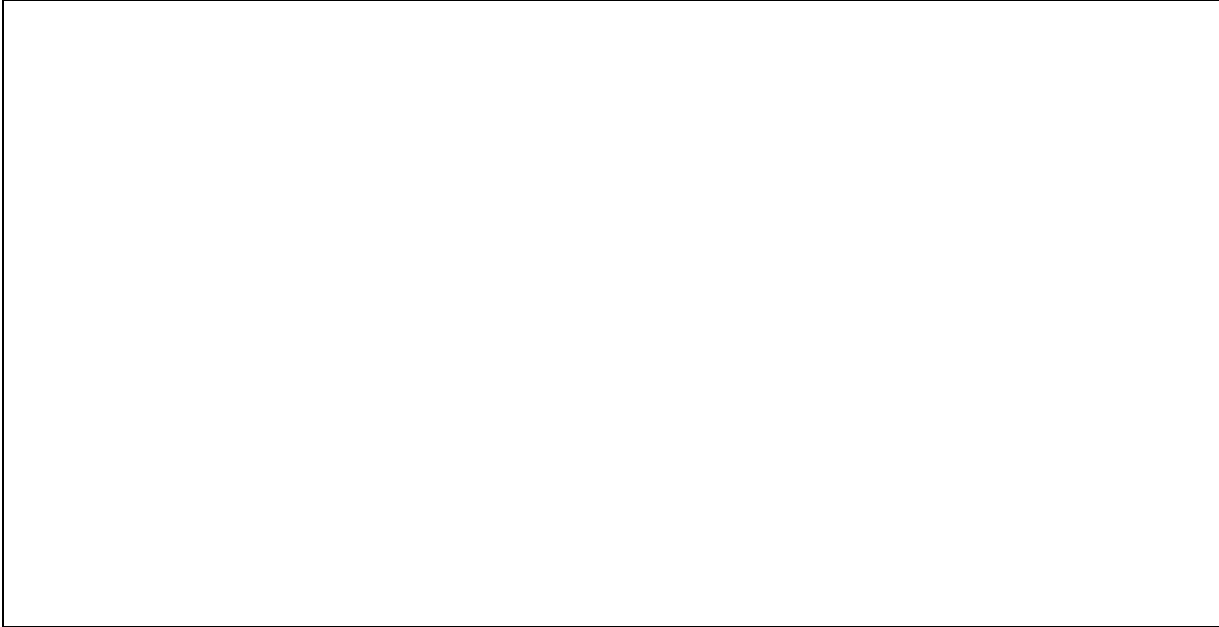


**Question 3: How might any Scotland specific adjustments be set to ensure that no-one in Scotland pays higher levels of contributions than their UK counterparts?**

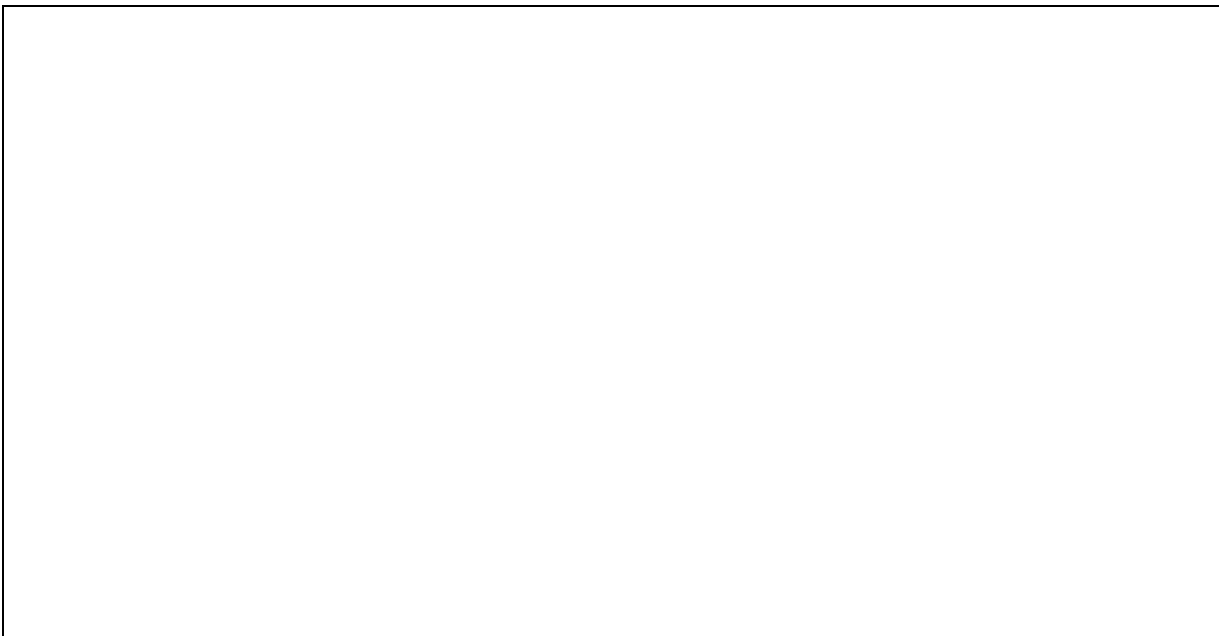


**Question 4: Do the proposed tiered employee contributions from April 2012 achieve the appropriate balance between:**

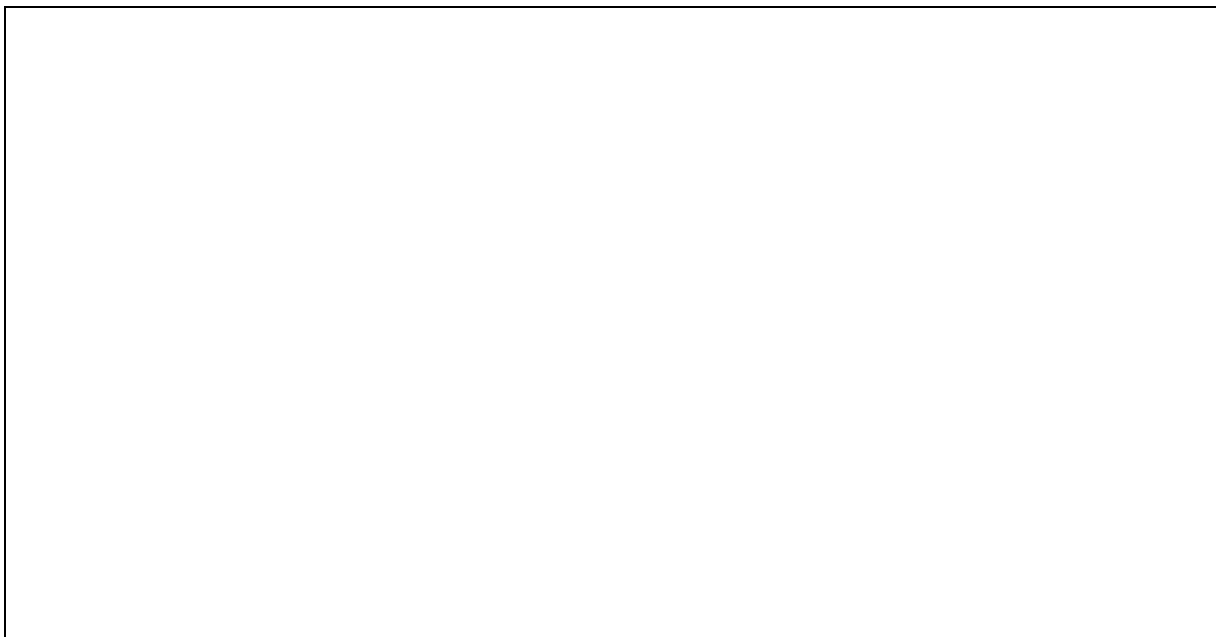
- **Protecting the low paid;**
- **Minimizing potential opt out from the scheme;**
- **Ensuring that they are set progressively, so that higher earners pay proportionately more?**



**Question 5: Do you consider that there are any potential equality issues? For example, is there anything in the proposals that might result in individual groups being disproportionately affected by the proposed contribution tiers?**



**Question 6: Are there any other specific issues around these potential increases that you would like the Scottish Government to consider?**



Please e-mail your response to [nhspensionsreform@scotland.gsi.gov.uk](mailto:nhspensionsreform@scotland.gsi.gov.uk) or send to:

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Closing date for receipt of comments is 17 November 2011.