NHS Pension Scheme (Scotland) 2025/09

*** Paragraph 9 was updated on 4 November 2025**

Who should read:	• NHS HR and Payroll Managers • GP Practice Managers • Direction Bodies • Practitioner Service Division (PSD) • Dental Payments • Trade Unions
Action:	Employers to inform scheme members
Subject:	Increase to the normal minimum pension age from 6 April 2028
Date:	31 July 2025

The purpose of this circular is to notify employers and members of changes to the normal minimum pension age from 6 April 2028.

Key information in this circular:

- The UK Government has announced that the earliest age members can take their pension from will increase from age 55 to 57 with effect from 6 April 2028.
- Members will be protected from these changes if they joined the NHS Pension Scheme (Scotland) before 4 November 2021
- This increase does not apply to members who take their pension early due to ill health.

Background

1. The normal minimum pension age (NMPA) is the earliest age from which most people can access their workplace or personal pensions. Registered pension schemes, such as the NHS Pension Scheme (Scotland) (NHSPS[S]) must not normally pay any benefits to members until they reach the NMPA, except on ill health grounds.

2. The NMPA is set by the Finance Act 2004 and was introduced in 2006. In short:

- before 5 April 2010, schemes could allow members to retire from age 50
- from 6 April 2010, the NMPA increased to 55
- from 6 April 2028, the NMPA will increase to 57

3. The NMPA is different from the state pension age, but the changes to NMPA align with changes to the state pension age, which is due to increase to age 67 in 2028. The state pension age is the normal pension age for members of the 2015 scheme, which is the age benefits can be taken without reduction.

Increase in the normal minimum pension age to 57

4. From 6 April 2028, the NMPA will increase from age 55 to 57. The majority of existing members of the scheme will be protected from this change and will retain a protected pension age (PPA) of age 55. Generally, members who had a PPA at the previous increase of the NMPA in 2010, will retain NMPA earlier than age 55.

Protected Pension Age (PPA)

5. The Finance Act 2004 provides transitional protection to certain members through a PPA, which protects them from the changes to the NMPA being introduced from 6 April 2028 and allows them to retain their current NMPA of age 55 or earlier.

6. In 2010, when the NMPA increased from age 50 to 55, existing members of the scheme at 5 April 2006 were protected and retained an NMPA of age 50. The changes coming into force in 2028 adopt a similar approach. Members will qualify for a PPA if they were a member of a scheme before 4 November 2021, with a right to claim their scheme benefits before age 57.

7. **In the NHS Pension Scheme (Scotland), this includes persons who, immediately before 4 November 2021, were active, pensioner, deferred or pension credit members of the 1995 Section, 2008 Section or the 2015 Scheme.** They will qualify for a PPA of age 55 (or their PPA from 2010) in that section or scheme. The PPA will apply to pension benefits built up before 2028 and also benefits accrued after 2028.

8. Members who do not have such a right (broadly anyone who joined after 4 November 2021), will retain the current NMPA (age 55) until April 2028, from which point their NMPA will increase to age 57. The increased NMPA of age 57 will apply to benefits accrued before and after 2028.

9. *Where a member joins the NHSPS(S) for the first time on or after 4 November 2021 and transfers their pension from another registered pension scheme - where they previously had an actual or prospective right to take pension benefits from an age before 57 - they will have a PPA in respect of the transferred-in benefits. However, it is proposed the member would not be able to access those benefits from their PPA; instead, the transferred-in benefits will be payable alongside benefits accrued in the NHSPS(S), which will be subject to the NMPA of 57. This is because the rules of the NHSPS(S) do not permit different groups of

benefits to be claimed separately, and there is no mechanism in place for "ring-fencing" specific tranches of pension benefits.

Further information

10. An initial list of Frequently Asked Questions can be found in **Annex A** and a flowchart is available in **Annex B**.

11. **There are a number of specific scenarios and issues which require further consideration before the NMPA changes are implemented in April 2028. We will continue to update the SPPA website and provide further information as soon as it becomes available.**

Please contact SPPAPolicy@gov.scot if you have any enquiries about this circular.

SPPA Policy
31 July 2025

Annex A

Frequently Asked Questions

Q1. Who made the decision to increase the NMPA?

A1. In 2014, following the consultation on 'Freedom and Choice in Pensions', the UK Government announced it would increase the NMPA to age 57 in 2028 to coincide with the rise of state pension age to 67. This applies to most UK private and public sector pension schemes.

While the Scottish Government has executively devolved responsibility for public service pension schemes, including the NHS Pension Scheme (Scotland), it must comply with UK Government primary legislation, such the Finance Act 2004 which provides for the NMPA.

Q2. Does the increase in the NMPA apply to all Public Service Pension Schemes?

A2. No. The increase in NMPA from age 55 to 57 does not apply to members of public service schemes for Firefighters, Police and the Armed Forces. It does, however, apply to all members of the NHS Pension Scheme (Scotland).

Q3. Does this change apply to AVC Schemes?

A3. Yes. The NMPA for accessing Additional Voluntary Contributions (AVCs), including those with Standard Life and Utmost Life and Pensions, will increase from 55 to 57 on 6 April 2028. This change applies unless you have a PPA or are retiring due to ill health.

Q4. Do the changes apply to additional pension?

A4. Yes. The NMPA for accessing any additional pension you may purchase will increase, in the same way as for your main scheme benefits, from 55 to 57 on 6 April 2028. This change applies unless you have a PPA or are retiring due to ill health.

Q5. What is the impact of this change on members affected by the 2015 Remedy?

A5. If you are eligible for Remedy and have a PPA, you will retain this right for any service rolled back into your 1995 or 2008 Section of the NHS Superannuation Scheme (known as the legacy scheme).

Q6. I have deferred benefits in the scheme. Will I be affected by the change to NMPA?

A6. If you joined the NHS Pension Scheme before 4 November 2021 and have subsequently left or opted out and deferred your benefits, you will have a PPA of age 55 and will not be affected by the change to NMPA.

If you joined the scheme on or after 4 November 2021, your minimum pension age for claiming your benefits, including deferred benefits, will rise to 57 from 6 April 2028.

Q7. What is the significance of the 4 November 2021 date?

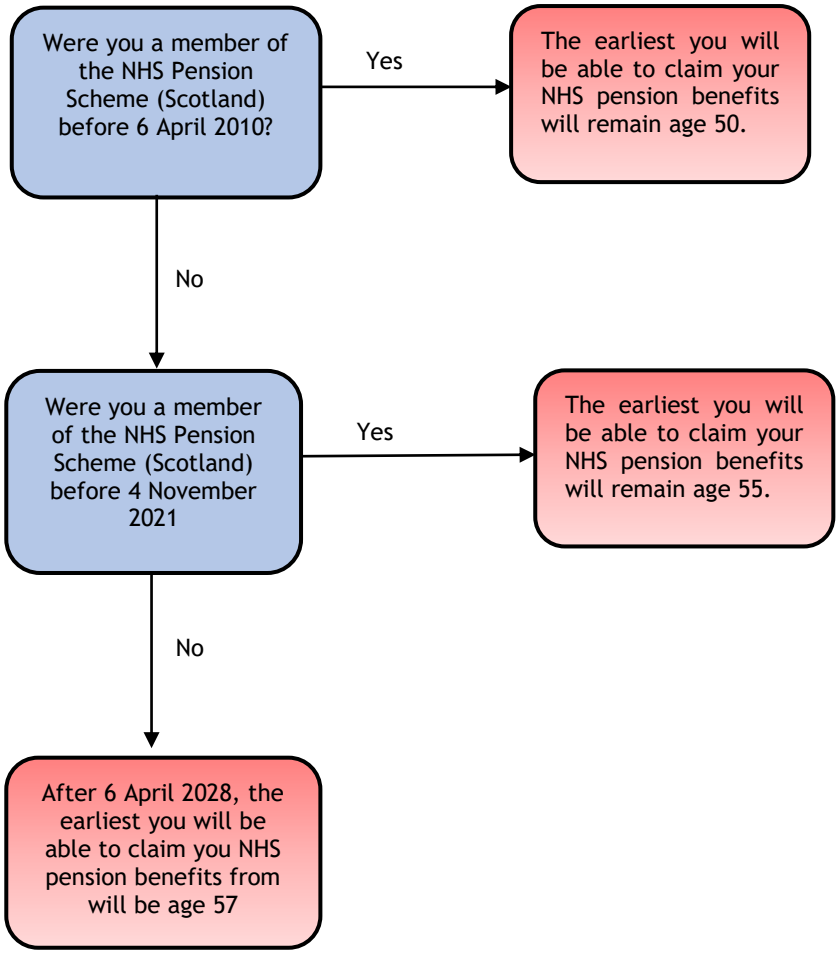
A7. This is the date the UK Government published a policy paper announcing details of the implementation of the increase in NMPA and a proposed framework of protection pension ages. They also published the Finance Bill 2021-22 on 4 November 2021 which introduced the changes in legislation.

Q8. I am due to receive a credit pension through a Pension Sharing Order. Will I be affected by the changes?

A8. If you are due to receive a credit pension through a Pension Sharing Order which was implemented before 4 November 2021, your pension will not be affected by the changes to NMPA and you will retain your PPA of age 55.

Q9. What happens if I opt out of the scheme?

A9. If you were a member of the scheme on or before 3 November 2021 and had a PPA you will be able to retain this PPA if you opt out of the scheme and return at a later date. If you joined the scheme on or after 4 November 2021 and do not have a PPA, any benefits accrued in the scheme before, or after, any breaks in service will be payable from age 57 after 6 April 2028.

Annex B

Will I have a Protected Pension Age and be eligible to claim my pension benefits before age 57, after the changes to Normal Minimum Pension Age are introduced from 6 April 2028?