NHS Pension Scheme (Scotland) 2025/11

Who should read:	General Medical Practitioners
Action:	GPs must ensure policy requirements are being followed for all employments / contracts determined as 'practitioner' for the purposes of the NHS Pension Scheme regulations.
Subject:	Guidelines for meeting policy requirements on the application of correct employee pension contribution rates for 'practitioner' employments / contracts.
Date:	08 December 2025 (updated 04 March 2026)

The purpose of this circular is to advise GPs of the expected process and their responsibilities for applying the correct employee contribution rate for 'practitioner' employments / contracts.

Key information in this circular:

- Incorrect employee contribution rates have been applied to 'practitioner' posts.
- An agreed prevention measure has been introduced.
- Guidelines are provided on the expected process for applying the correct employee contribution rates.

1. Background

1.1. There are two types of member employments / contracts within the NHS Pension Scheme regulations – 'officer' and 'practitioner'. This circular relates to 'practitioner'[1].

1.2. A 'practitioner' pension contribution rate is based on total aggregated annual earnings for all 'practitioner' posts a GP has. Who sets the rate for 'practitioner' posts depends on the employment / contract type, which is detailed under 'Guidance for GPs'. For 'officer' employments the employer sets the contribution rate under PAYE.

1.3. Incorrect employee contribution rates have been applied to 'practitioner' employments / contracts[2]. This can happen where the GP has not shared all 'practitioner' earnings with NHS organisations and they are only aware of earnings for the employment(s) under their control. In that case the NHS

organisation would apply a corresponding rate for that employment(s) alone, which could result in underpayment of pension contributions.

2. Introduction of a prevention measure

2.1. Aimed at preventing or reducing the above-mentioned scenario, a prevention measure was agreed earlier this year with NHS Pensions Board members, including British Medical Association (Scottish General Practitioners Committee) representation, for NHS organisations to either apply:

2.1.1. the highest employee contribution rate (currently 12.7%), or

2.1.2. a lower rate worked out using the published contribution rate tables where all aggregated 'practitioner' earnings are known.

2.2. Where a GP has a 'practitioner' employment(s) on the highest contribution rate and subsequently shares all 'practitioner' earnings within the scheme year, NHS organisations are obligated to apply the correct employee contribution rate and refund contributions where applicable.

3. Guidelines for GPs

3.1. Guidelines for GPs on the application of the above prevention measure and their responsibilities within the expected process for applying the correct employee contribution rate for 'practitioner' posts is provided in this section.

3.2. A visual diagram of the process is also provided in Appendix A 'Flowchart for GPs with 'Practitioner' Roles'.

3.3. These guidelines apply to 'practitioner' employments / contracts that are eligible for membership of the NHS Pension Scheme (Scotland).

3.4. A 'practitioner' employment / contract includes the following roles where they are *delivering, or engaging in the delivery of, Primary Medical Services* (PMS), including OOH services and advisory work connected with PMS:

- GP Practice Partnership
- GP Practice employment
- Health Board employment
- GP Locum contract

3.5. **GP Practice Partnership**. Where the GP is a GP Practice Partner they should complete a Notification of Estimated Pensionable Profits form[3] at the start of the scheme year and provide a copy to Practitioner Services Division (PSD), a division of NHS National Services Scotland.

3.6. PSD will apply an employee contribution rate for that scheme year based on the submitted estimated pensionable profits.

3.7. After the scheme year has ended GP Partners will submit a GP Annual Certification of Pensionable Profits (GAC) form[4] to PSD. This is usually done by the GP's accountant. The GAC process should use the correct employee contribution rate and account for a full reconciliation / correction of employee contributions over or under funding across all 'practitioner' posts for that scheme year.

3.8. Where a GP Partner's overall 'practitioner' earnings within a scheme year are lower than the range attracting the highest employee pension contribution rate then they will likely have over paid employee contributions on NHS 'practitioner' employments. To avoid this, they can complete an 'Annex D' form[5] at the start of the scheme year, listing all 'practitioner' earnings and provide a copy to each NHS organisation they are employed or under contract with. Otherwise, the GP can wait for the overpaid contributions to be reconciled as part of the GAC process.

3.9. Where a GP Partner has one or more GP Locum contracts that are 'practitioner' roles within the same scheme year, they should determine the applicable employee contribution rate based on all aggregated 'practitioner' earnings using the 'practitioner' rate table[6] published on the SPPA website. The same applicable rate should be entered on each Form B[7] submitted monthly to PSD, one form for each contracting practice.

3.10. **Other 'practitioner' employments / contracts**. Where a GP is not a GP Practice Partner but has other 'practitioner' employments / contracts within a scheme year, they should complete an 'Annex D' form[5] listing all 'practitioner' earnings and provide a copy to each NHS organisation they are employed or under contract with. Earnings from non-NHS work or NHS contracts where a GP has opted out of the NHS Pension Scheme (Scotland) should not be included. Earnings from 'officer' employments should also NOT be included.

3.11. The 'Annex D' form should be completed at the start of each new scheme year (starts on 1 April) and each time there is a change of overall earnings within a scheme year. Where the GP has provided a completed 'Annex D' form with accurate earnings figures then the NHS organisation (e.g. Health Board or GP Practice Payroll) should apply the correct employee contribution rate and reconcile by year end.

3.12. Sharing these earnings at the start of, and within, the scheme year avoids resolving pension contribution anomalies after the end of a scheme year, which can be a lengthy, complex, and costly process. Any underpaid contributions will be sought from the member.

3.13. It is a condition of a GP's NHS Pension Scheme membership that practitioners proactively liaise with relevant NHS organisations to ensure they have paid the correct tiered contributions across all 'practitioner' posts.

3.14. Failure to share earnings via the 'Annex D' form will result in the highest tiered contribution rate being applied by Health Board or GP Practice Payroll. Where this is not the correct rate then the member will pay more contributions than are required in the scheme year which will require post-scheme year resolution.

3.15. Where the GP realises that they are overpaying contributions and subsequently submits an 'Annex D' form within the scheme year then, similar to point 3.11, NHS organisations are obligated to correct this.

3.16. Where the GP has one or more GP Locum contracts that are 'practitioner' roles within the same scheme year, they should determine the applicable employee based on all aggregated 'practitioner' earnings using the 'practitioner' rate table[6] published on the SPPA website. The same applicable rate should be entered on each Form B[7] submitted monthly to PSD, one form for each contracting practice.

3.17. **One 'practitioner' employment**. Where a GP only has one 'practitioner' Health Board or GP Practice employment within a scheme year, they are still required to complete an 'Annex D' form[5], including indication that they only have one source of 'practitioner' earnings.

3.18. If they receive the completed 'Annex D' form then the NHS organisation (Health Board or GP Practice Payroll) should apply the correct employee contribution rate to the employment and reconcile by year end.

3.19. **GP Locum contract(s) only**. Where the GP has one or more GP Locum contracts and no other type of employment / contract then they do **not** need to complete an 'Annex D' form. They should determine the applicable employee contribution rate based on all aggregated 'practitioner' earnings using the 'practitioner' rate table[6] published on the SPPA website. The same applicable rate should be entered on each Form B[7] submitted to PSD monthly, one form for each contracting practice.

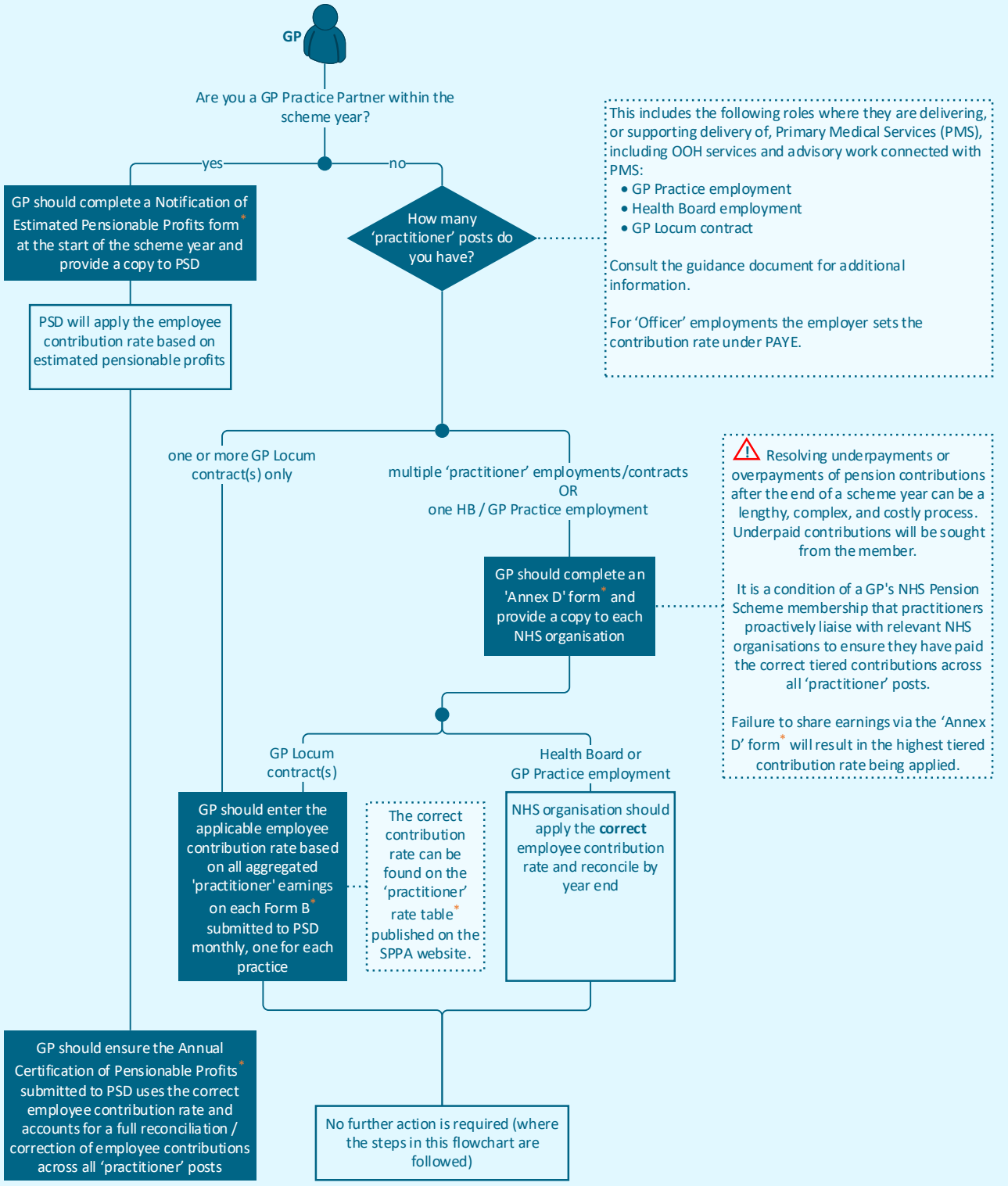
3.20. Where there is no GP Practice Partnership and the correct employee contribution rate has been applied across all 'practitioner' earnings within the scheme year then no further action is required.

3.21. Please see the flowchart included in Appendix A below which provides a visual guide for GPs to follow the above guidelines for meeting policy requirements.

Appendix A Flowchart for GPs with 'Practitioner' Roles

Application of correct employee pension contribution rates for GP 'practitioner' employments / contracts

Applies to employments / contracts that are eligible for membership of the NHS Pension Scheme (Scotland)



* See end notes in the guidance document containing this flowchart for links to the 'practitioner' rate table, 'Annex D' form, Form B, Notification of Estimated Pensionable Profits, and the Annual Certification of Pensionable Profits.

Endnotes

[1] For further information expand the Practitioner Contributions panel on the following web page: https://pensions.gov.scot/nhs/about-nhs-pensions/how-your-pension-works

[2] See the following web page for further information: https://pensions.gov.scot/nhs/practitioner-contributions-remediation

[3] The "Notification of Estimated Pensionable Profits" form is available as a link on the following web page: https://www.nss.nhs.scot/publications/nhs-pension-forms-guidance/

[4] The "Annual Certification of Pensionable Profits" (GAC) form is available as a link on the following web page: https://www.nss.nhs.scot/publications/nhs-pension-forms-guidance/

[5] 'Annex D' form (Annex D: Assistant Practitioners and Salaried GPs - Annual Self-assessment) is available as a link on the following web page: https://pensions.gov.scot/nhs/nhs-forms

[6] 'practitioner' rate table – see Table 1 under the 'Contributions' section of the following web page: https://pensions.gov.scot/nhs/employers/member-contributions
Guidance and rate tables are also published in NHS Circulars, which can be found at the following link: https://pensions.gov.scot/nhs/scheme-governance-and-legislation/circulars

[7] Form A " NHS Pension Scheme GP Form A" and Form B "NHS Pension Scheme GP Form B from 01/10/24" are available as links on the following web page: https://www.nss.nhs.scot/publications/nhs-pension-forms-guidance/