



The Rt Hon Anna Turley MP
Minister of State
Cabinet Office
70 Whitehall
London
SW1A 2AS
(via email)

1 December 2025

Dear Anna,

Tackling the Gender Gap in the Civil Service Pension Arrangements

We are writing to ask you to take action to tackle the large and unacceptable gender gap in the civil service pension arrangements.

The UK's overall Gender Pension Gap

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

The DWP published an ad hoc statistical release² in July that included an estimate of the gender gap in private pension wealth in 2020 to 2022 of 48%.

Whatever definition of the gap is used, and whatever data source estimates are based on, there is clearly a significant gender gap in pensions that government has a duty to tackle.

The Gender Pension Gap in the Civil Service Pension Arrangements

It may surprise you to learn that the gender gap in the civil service pension arrangements is even larger than the overall gender pension gap for the UK.

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

² [Gender Pensions Gap in Private Pensions: 2020 to 2022 - GOV.UK](#)

The membership data report for the 2020 actuarial valuation of the civil service scheme³ showed a gender pension gap of 45% (using the same definition as Prospect's report).

We know you recognise the need to tackle this significant level of inequality in the scheme; indeed, the Equality Act 2010 requires you to have due regard to the need to eliminate it.

We recognise that several policies, particularly around the gender pay gap, shared parental leave and childcare, will help reduce the gender pension gap in the scheme over time.

However, the impact of caring responsibilities on the pension accrued by women will continue to drive an unacceptably large gender gap unless addressed in the scheme rules.

If the rules of the Alpha scheme better reflected the working lives of women (and also some men) with caring responsibilities, this would greatly reduce the disparity in outcomes.

Proposals to reform LGPS (England and Wales) and LGPS (Scotland)

In addressing the impact of caring responsibilities on the gender gap in the civil service scheme, you have the great advantage of learning from other big public service schemes.

The Scheme Advisory Board (SAB) of LGPS (England and Wales) published an analysis⁴ they commissioned from the Government Actuary's Department (GAD) in January 2023.

This 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 letter⁵ from Chair of the SAB to the then Chief Secretary to the Treasury 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 proposals⁶ to change LGPS (England and Wales) regulations to deal with the impact of caring responsibilities on pension entitlement.

The proposals intended to address the gender pension gap in the LGPS (England and Wales) were:

- (1) Making authorised unpaid absences under 31 days automatically pensionable. Authorised unpaid absences (e.g. 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 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

³ See Slide 21 of 45 (45% = (£11,369-£6,251)/£11,369): [Microsoft PowerPoint - CS GB 2020 valuation data report - accessible to be issued](#)

⁴ https://lgpsboard.org/images/Reports/2023/GADGenderPensionGapReport_Jan2023.pdf

⁵ [17052024_LettertoLauraTrottMPfromCllrPhillips_GPG.pdf](#)

⁶ [Local Government Pension Scheme in England and Wales: Access and fairness - GOV.UK](#)

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, these proposals represent the most comprehensive attempt to tackle the gender pension gap in any occupational pension scheme in the country.

The size of the LGPS (England and Wales) means that these changes are also likely to have a material impact on the UK's overall gender pension gap.

LGPS (Scotland) has also been analysing these issues and is currently consulting⁷ on very similar changes to its regulations.

What we are asking you to do

We are asking you, as scheme manager, to commission a report by GAD with an analysis of the gender gap in the scheme, its main causes and recommendations to address it.

This should be the start of a process that results in proposals to address the gender pension gap in the civil service that are as effective as those consulted on by the LGPS.

Indeed, there does not appear to be any reason why some of the LGPS proposals could not be adopted in the civil service scheme.

For example, many civil servants also miss out on accruing pensionable service for up to 13 weeks of unpaid statutory parental leave; making all statutory parental leave pensionable would benefit them and reduce the gender pension gap in the scheme.

The scheme manager for the LGPS (England and Wales) stated that “government believes that the cost [of making unpaid statutory parental leave pensionable] would be affordable, both at the individual level (as in most cases it is time-limited to only 13 weeks of accrual) and at the fund-wide level (as the overall number of members who would take the full year of child-related leave in each valuation period is likely to be relatively small in the context of the entire fund).”

GAD estimated the proposal might cost the LGPS (England and Wales) under £1 million in increased contributions per year. As the cost to civil service employers would be of the same order of magnitude, it is clearly also affordable in this scheme too.

We recognise that other LGPS proposals, such as making it easier for scheme members with an unpaid break of more than 30 days to buy back any pension lost during that time, might be less straightforward to incorporate in the Alpha regulations. However, it is important that the main causes of the gender pension gap in the civil service are identified and for all practical proposals that would help close it to be assessed.

We would be happy to engage in ad hoc discussions about proposals to tackle the gender pension gap in the civil service, or for this issue to be delegated to the Scheme Advisory Board.

Lessons from previous attempts to tackle the gender pension gap

⁷ [Consultations | SPPA](#)

This is not the first time that our unions have raised the issue of the gender pension gap in the civil service pension arrangements and sought a discussion about meaningful proposals that would be effective in reducing it.

In response to earlier efforts, the Cabinet Office produced a paper⁸ on this issue for the Scheme Advisory Board.

A key conclusion from that paper was that “it is [women disproportionately undertaking caring responsibilities] rather than the scheme design that contributes to the Gender Pension Gap”.

This implies that the gender pension gap can only be addressed by wider societal changes, and not by amending scheme regulations.

We did not accept this at the time, and the LGPS schemes have since proven that it is possible, and desirable, to tackle the gender pension gap through changes to scheme design.

Treasury is responsible for public service pension scheme policy, and a Freedom of Information request⁹ for correspondence between the Cabinet Office and Treasury officials revealed potential reasons for the reluctance to change scheme rules.

The correspondence shows Treasury officials reducing the issue of the gender pensions gap to being one narrowly about pay (e.g.: “Pensions gap is a result of earnings differences. Best way to tackle it is through narrowing pay gap.”).

Clearly the gender pay gap is a major cause of the gender pension gap, but if the gender pay gap was eliminated tomorrow there would still be the major impact of caring responsibilities on the gender pension gap that would have to be dealt with.

There was even an apparent misunderstanding of the scale of the problem in the public sector in the correspondence (e.g.: “Would be good if there were equivalent stats on the pensions side! (i.e. gender pensions gap is lower in public than private sector).”).

We have shown that the gender gap for retired civil servants is higher than the overall gap for the UK, and this is the case for the membership of nearly all public service schemes (except those for teachers, which have a much lower underlying gender pay gap).

These misunderstandings of the causes and scale of the problem were potentially a major contributory factor to the underwhelming conclusion of the paper to the Scheme Advisory Board, which had the limited ambition of improving education and engagement.

We know from the example of the LGPS that it is possible tackle the gender pension gap through scheme design with targeted rule changes. We also know that some of these reforms can be delivered at negligible cost. We have a duty to tackle gender inequality in the civil service pension arrangements by putting these lessons into practice in this scheme too.

Prospect and FDA members have demonstrated significant support for applying the LGPS approach to their scheme with over 3,000 having signed a petition¹⁰ about this at the time of writing.

Given the high level of interest in this issue, we will share this letter with our members who participate in the civil service pension arrangements.

⁸ [SAB Gender Pension Gap Paper](#)

⁹ [FOI-response-Treasury-genderpensiongap-publicsectorschemes](#)

¹⁰ [End the Gender Pension Gap for public sector women | Megaphone UK](#)

Summary

The gender pension gap for civil servants is unacceptably high. The scheme managers for LGPS (England and Wales) and LGPS Scotland) have shown that there are effective and affordable rule changes that can tackle this issue. We are asking you to commission an analysis of the problem that could form the basis of discussions about how we can deal with it in the civil service.

Yours sincerely,

Steve Thomas

Prospect Deputy General Secretary

Adrian Prandle

FDA Assistant General Secretary