Scottish Women's Convention response to the UK Government's Call for Evidence on the:

Third State Pension Age Review

October 2025

Premise

Overview of the topic

The Pensions Act 2014 requires the UK Government to review the State Pension age at least every six years. As a result, Dr Suzy Morrison has been appointed by the Department for Work and Pensions Secretary of State to prepare an independent report prior to the third review.

This report aim to understand the merits of linking State Pension age to life expectancy; the role of State Pension age in managing the long-term sustainability of the State Pension; and the international experience of Automatic Adjustment Mechanisms for making decisions about State Pension age.

The Scottish Women's Convention (SWC)

The SWC is funded to engage with women across Scotland to ensure that their views are represented in policy and decision-making processes. The SWC uses the views of women to respond to a variety of parliamentary, governmental, and organisational consultation papers at Scottish, UK and international levels.

The SWC gathers information using different methods, including roadshows, thematic conferences, surveys, and both in-person and online roundtable events. This submission presents the views of a range of women, reflecting their opinions, ideas and lived experience. Working together with many other equalities organisations and community groups, we use our broad network to ensure that women from a range of backgrounds are heard and acknowledged. We are continually reviewing innovative ways of engaging with women and developing our trauma-informed and culturally sensitive practice to support vital contributions from as many women as possible.

Life Expectancy

What are the advantages and disadvantages of linking State Pension age to life expectancy?

The UK Government have clearly demonstrated an understanding of the principal advantages of linking State Pension age to life expectancy. These include ensuring the long-term financial stability of the State Pension system; promoting intergenerational fairness; and enabling a more responsive and evidence-based approach to demographic change. The review references international examples of automatic adjustment mechanisms and highlights the importance of maintaining a consistent proportion of adult life spent in retirement across generations. These considerations suggest that the Government is actively engaging with the practical and policy-based rationale for such a linkage.

While linking State Pension age to average life expectancy may offer a practical and financially sustainable framework, it also raises significant concerns about regional fairness. In particular, those living in Scotland face disadvantage due to consistently lower life expectancy compared to the UK average[1]. This means that Scots may spend fewer years in healthy retirement, despite contributing to the same national system throughout their working lives. Such disparities risk entrenching existing health and socioeconomic inequalities, and therefore we propose that a more nuanced approach, which accounts for regional variation, is required.

Additionally, linking State Pension age to average life expectancy may have a disproportionate impact on women, particularly marginalised women. These women are more likely to have experienced interrupted work histories due to caring responsibilities. Women aged 50-64 are significantly more likely than men to be economically inactive, often due to unpaid care for children, elderly relatives, or partners[2]. This can result in lower lifetime earnings and reduced private pension savings, making the State Pension a critical source of income. Raising the pension age without accounting for these gendered patterns risks deepening financial insecurity for older women.

The experience of the Women Against State Pension Inequality (WASPI) campaigners offers a clear example of how changes to State Pension age can disproportionately harm women. Born in the 1950s, many of these women were subject to rapid and poorly communicated increases in their State Pension age[3]. The lack of adequate notice left many unable to prepare financially, particularly those who had already left the workforce to care for family members or who lacked access to private pensions. The impact has

[1] UK Government. (2024). Life Expectancy for Local Areas of Great Britain: Between 2001 to 2003 and 2021 to 2023. Available at: https://www.ons.gov.uk/peoplepopulationandcommunity/healthandsocialcare/healthandlifeexpectancies/bulletins/lifeexpectancyforlocalareasoftheuk/between2001to2003and2021to2023#period-life-expectancy-in-constituent-countries-of-great-britain-and-english-regions

[2] UK Government. (2024). Economic Labour Market Status of Individuals Aged 50 and Over, Trends Over Time: September 2024. Available at: https://www.gov.uk/government/statistics/economic-labour-market-status-of-individuals-aged-50-and-over-trends-over-time-september-2024/economic-labour-market-status-of-individuals-aged-50-and-over-trends-over-time-september-2024

[3] Women Against State Pension Inequality. (2025). 1950s Women Unfairly Affected by State Pension Age Changes. Available at: https://waspi.co.uk/information/background-information/

been severe for many, with some being forced into insecure employment or an increased reliance on partners. The WASPI case outlines why a gendered lens must be taken to State Pension assessment; considering how women's life patterns differ from men's, and the need for fair and transparent implementation when adjusting pension policy. A blanket decision to link State Pension age with life expectancy risks deepening inequalities and disproportionately penalising women who have contributed to the care economy throughout their lives.

How would linking State Pension age to life expectancy impact upon intergenerational fairness?

A key argument in favour of linking State Pension age to life expectancy is the promotion of intergenerational fairness. This approach aims to ensure that each generation spends a broadly similar proportion of their adult life in retirement, regardless of when they were born. As life expectancy increases, raising the pension age helps to maintain this balance, preventing younger generations from shouldering an unsustainable financial burden to support longer retirements. It also supports the long-term viability of the State Pension system by aligning retirement age with demographic trends, making it more predictable and equitable across time. When consulting with women, they have highlighted that current systems which continually increase the age at which an individual receives a State Pension, as being unfair to younger generations. They highlighted the increased likelihood of disability as one enters their older years, creating an untenable employment situation.

- "...in their mid-60s, a significant percentage of women are disabled in some way, which means they're working with a long-term health condition. Yet they keep increasing the State Pension age."
- "...and that's something else that's completely ludicrous, they're expecting young people to work till their seventies in onerous tasks."

However, this model also presents disadvantages that can undermine its fairness in practice. Life expectancy is not evenly distributed across society, and younger generations, particularly those residing in low-income areas, may not experience the same improvements in health or longevity. If life expectancy were to decline, a linked system would theoretically lower the State Pension age, however in reality, we question whether political or economic difficulty may prevent implementation. Moreover, this approach does not account for differences in healthy life expectancy, meaning some individuals may be expected to work longer despite facing significant health challenges. Without safeguards to address these disparities, the principle of intergenerational fairness risks becoming a theoretical ideal, rather than a lived reality.

Additionally, younger women currently face enormous economic pressures, with precarious employment resulting in lower pension contributions. Intergenerational fairness must consider not only longevity, but the quality and equity of women's working lives. As stated, a rigid life expectancy model risks undermining fairness for women who have faced systemic disadvantage across their employment.

Sustainability

What role, if any, should State Pension age have for managing the cost of the State Pension in the longer term?

Fiscal sustainability remains an essential consideration for any government, aiming to improve outcomes for citizens. State Pension plays an integral role in this system, allowing older people to live within some comfort, after years of sustained contributions. At the SWC, we strongly believe that providing a comprehensive State Pension for all UK citizens, actively tackles poverty and disadvantage. It is this role that we believe should be the key consideration in the setting of a State Pension age, rather than managing the cost of the State Pension in the longer term. Using State Pension age as a blunt instrument risks overlooking the variety of experiences had across the UK – with women facing additional barriers to effective pension accrual through structural barriers. We propose that public welfare should be prioritised, with fiscal sustainability provided through a stronger economy, and resultant improved opportunities for women.

What are the advantages and disadvantages of using State Pension age to manage the cost of the State Pension in the longer term?

Using State Pension age to manage long-term costs may offer fiscal benefits, but without wider reform, it risks deepening inequality. Older women, particularly through with caring responsibilities or in poor health, face increased financial insecurity if required to work longer. This can lead to greater reliance on disability and housing benefits, undermining gender equality commitments. Any cost-saving measures must be accompanied by comprehensive changes to employment, health, and care systems to ensure that sustainability does not come at the expense of fairness.

What other factors relating to sustainability should the Government consider when determining State Pension age? What are the advantages and disadvantages of using these factors?

When determining the sustainability of the State Pension age, the Government must consider factors beyond fiscal projections. Gendered patterns of employment and unpaid care work significantly affect women's ability to contribute to pensions and remain in the workforce into later life. Regional health inequalities also mean that individuals in certain areas, particularly in Scotland, may not live long enough in good health to benefit from a later pension age. The impact on informal carers – many of whom are women – must be recognised, as their unpaid labour often goes unaccounted for in traditional economic models. Including these factors would support a more equitable and realistic approach to long-term pension sustainability.

Automatic Adjustment Mechanisms (AAMs)

What are the advantages and disadvantages of using AAMs to make changes to State Pension age (i.e. if a certain factor changes, State Pension age is automatically increased or decreased as a result)?

Automatic Adjustment Mechanisms (AAMs) offer a structured and transparent way to align State Pension age with demographic trends, particularly life expectancy. One of their key advantages is that they utilise a predetermined formula, reducing the need for repeated legislative intervention. This can enhance public confidence in the system's predictability, allowing individuals and employers to play for retirement.

However, AAMs also present notable disadvantages. Their automatic nature may limit flexibility and responsiveness to a range of disparities – for example, individuals residing in Scotland with a lower life expectancy, may be disadvantaged by a uniform pension age that does not reflect local health outcomes. Similarly, those in physically demanding jobs or with caring responsibilities may struggle to work longer, even if average life expectancy increases. Without in-built safeguards, AAMs risk entrenching inequalities and overlooking the lived realities of diverse groups. AAMs risk entrenching inequalities if based solely on national averages. The SWC therefore cautions against mechanisms that ignore protected characteristics under the Equality Act 2010, as well as socio-economic status.

There is also a risk that the public may perceive the system as rigid or unfair if adjustments occur without adequate consultation or explanation – as seen in the case of the WASPI women discussed above. To mitigate these risks, any AAM adopted in the UK should be accompanied by mechanisms which review, increase transparency, and provide targeted support for those disproportionately affected.

- "I would say that straight forward structural discrimination is to blame [for the WASPI case]…it's one of the rawest and most obvious areas where women were discriminated against."
- "It's riding roughshod over women, partly through ignorance or what women's lives are actually like, and partly through 'well it won't matter anyway'."

What factors could be considered for use in an AAM and why?

When considering factors for use in Automatic Adjustment Mechanisms (AAMs), it is essential to incorporate data that reflects the diverse realities of the population. AAMs should include regional healthy life expectancy data to account for geographical disparities in health outcomes, ensuring fairness. Additionally, gender-disaggregated employment and health statistics are crucial to capture the differing impacts of work and health trends on men and women, particularly given the gendered nature of caregiving and workforce participation. Also, we suggest that carer status and contributions through unpaid labour be factored in, as these roles – often undertaken by women – significantly affect individuals' ability to work and save for retirement. Including these elements would help ensure that any adjustments to the State Pension age are equitable, evidence-based, and sensitive to the lived experience of all citizens.

Factors for Setting State Pension Age

What other factors do you think the Government should consider when making decisions regarding State Pension age? What are the advantages and disadvantages of using these factors?

In addition to life expectancy and sustainability, the Government should consider healthy life expectancy, regional disparities, and intersectional experiences. These factors provide a more accurate picture of individuals' ability to work into older age and enjoy retirement. As stated, life expectancy in the most disadvantaged areas of Scotland varies significantly from the national average, meaning many women may not have the opportunity to benefit from a later pension age. Considering these factors would promote fairness and inclusivity but may complicate policy implementation and require a more flexible approach. Therefore, we would urge the inclusion of the impact of unpaid care on pension accrual, as well as regional deprivation indices.

Which of these factors (life expectancy, sustainability and other factors) do you think are the most important for the Government to consider when making decisions regarding State Pension age, and why?

While life expectancy and sustainability are important, the most critical factors are those that reflect lived inequalities – particularly healthy life expectancy, disability, and women's socioeconomic disadvantage. These determine how long people live, but also, how long they can work and live well. A pension system that ignores these realities risks deepening inequality and excluding the most vulnerable in society. Therefore, fairness and lived experience should be prioritised alongside fiscal sustainability.

How might changes to the State Pension age impact people differently? Which groups of people, regions, or nations, may be most impacted by changes to the State Pension age, and why?

Changes to the State Pension age disproportionately impact women. As stated above, women born in the 1950s, or WASPI women, experienced significant financial hardship due to rapid and poorly communicated increases in pension age. Many had planned their retirement based on previous rules, leaving them without adequate time or resources to adjust, leading to increased poverty and stress. Women are also more likely to have interrupted work histories due to unpaid caring responsibilities. This results in low lifetime earnings and private pension savings. These structural inequalities mean that women rely more heavily on the State Pension, and any delay in access can have severe consequences.

Disabled women also face particular disadvantage – due to continued disadvantage and discrimination, disabled women experience high living costs, poor access to employment, and health inequalities. As a result, it can be said that disabled people are more likely to be reliant on social security payments, including the State Pension. Also,

disabled people experience a mortality rate which is twice as high than those without a disability[4]. Therefore, it can be estimated that changes to the State Pension age will likely disproportionately impact disabled women, with many unable to access their basic entitlements.

Regionally, Scotland is particularly affected due to lower life expectancy and healthy life expectancy levels, especially in areas such as Glasgow City, where women's life expectancy is significantly below the UK average. When assessing changes to State Pension age in 2023, the SWC reported that for the most disadvantaged 10% of Scotland, healthy life expectancy for women is just 47.4 years, compared to a national average of 72.3 years[5]. A uniform pension age across the UK fails to account for these disparities, penalising those in poorer health and low-income communities.

In summary, any changes to the State Pension age must consider intersectional impacts, with a particular focus on disability and socioeconomic status, to ensure women across Scotland are adequately supported. Without targeted support and flexibility, these changes risk deepening existing inequalities, exacerbating gendered poverty.

[4] The Health Foundation. (2025). Inequalities in Mortality Rates by Disability. Available at: https://www.health.org.uk/evidence-hub/health-inequalities/inequalities-in-mortality-rates-by-disability
[5] Scottish Women's Convention. (2023). Pension Review Report. Available at: https://www.scottishwomensconvention.org/resources/pension-review-report-2023-final.pdf

Conclusion

Having listened to women, our three key recommendations on this topic are:

- Adopt a regionally sensitive approach to State Pension age.
- Apply a gendered lens to pension policy.
- Prioritise public welfare over fiscal cost-cutting.

The SWC is grateful for the opportunity to respond to the UK Government's Call for Evidence on the **Third State Pension Age Review**. As an organisation, we will continue to work with women from across Scotland to gather voices and experiences relating to this topic and its effects on women's equality.

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