



The Strategy for Our Veterans

HM Government

The Royal British Legion Consultation Response

February 2019

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1. About us

The Royal British Legion is at the heart of a national network that supports our Armed Forces community through thick and thin – ensuring that their unique contribution is never forgotten. We were created as a unifying force for the military charity sector at the end of the First World War, and still remain one of the UK's largest membership organisations. The Legion is the largest welfare provider in the Armed Forces charity sector, helping veterans young and old transition into civilian life. We help with employment, financial issues, respite and recovery, through to lifelong care and independent living. For further information, please visit www.britishlegion.org.uk

2. Our Response

To inform our response, the Legion undertook four focus groups across England in Leeds, Plymouth, London and Colchester, one focus group in Belfast, one in Cardiff and four in Scotland on the content of the Strategy consultation. These focus groups were carried out in January 2019 and involved members of the Armed Forces community, staff, sector partners and Legion members. Additionally over 100 supporter and beneficiary responses to the strategy consultation have been shared with us, including via the Legion's website.

In Scotland our sister charity Poppyscotland will be responding directly to the Scottish Government. However, as not all matters are devolved, Poppyscotland has additionally provided comments on the UK Government Veterans Strategy. These comments are included in Appendix 2 for consideration.

In Wales, the Legion will be responding directly to the Welsh government as part of a cross sector response. This will also be shared with the UK Government.

3. Summary of Recommendations

Throughout the consultation response we have included a number of recommendations for the implementation of the Strategy for our Veterans. Whilst we believe that all the recommendations within this consultation response should be acted upon, we also recommend the following are looked at as a priority. Please note that these recommendations are not placed in any order.

It is also vital that the implementation of the Strategy for our Veterans recognises the differing political and cultural landscape of the UK, and that any resulting framework pays particular attention to how outcomes can be achieved effectively in Scotland, Wales, England and Northern Ireland to ensure parity wherever possible.

- The Ministry of Defence review Veterans UK processes for improvements, including the enhanced use of digital platforms, improved pension advice and their role in co-ordinating activity.
- The Ministry of Defence and the Ministry of Housing, Communities, and Local Government monitor, evaluate and enhance support for local authorities' implementation of Covenant delivery infrastructure. The Government should also retain the option of giving legal force to the Covenant.
- Introduce a standardised question that all public bodies ask to improve identification of members of the Armed Forces community, exploring the feasibility of a "tell me once" service.
- The Ministry of Defence implement more robust and proactive communications strategies to respond to negative and inaccurate media stories on veterans, utilising a wider range of spokespeople from the Armed Forces community.
- The Government commit to permanently funding the maintenance of the national Armed Forces Memorial at the National Memorial Arboretum.
- The Ministry of Defence and Defence Relationship Management provide an enhanced package of education and practical support to business covenant signatories, looking further than their role as employers.
- Armed Forces compensation is routinely disregarded from all statutory means tests. Where possible, this should include War Widows' Pensions.
- The Home Office waive Indefinite Leave to Remain fees for Commonwealth Armed Forces Personnel and their dependents with immediate effect.
- A multi-stakeholder working group is established to come to an agreed definition of Priority Treatment.
- The Government publishes a five-year statement on progress against each of the recommendations in the Phillips review.

We have also included recommendations that the Legion has previously publicly called for. We are pleased that in many areas progress is underway, however more still needs to be done:

- The Ministry of Housing, Communities and Local Government and local authorities extend provisions in housing services for veterans to divorced and separated spouses and partners.
- The Government secure investment for research into health and social care models that can improve recovery and quality of life for ill Gulf War veterans, communicate the results of similar research being undertaken in the US to Gulf War veterans here in the UK.
- The new veteran status question for the 2021 census is included in the Census Order when put before parliament, and that parliament approves it. The Northern Ireland Statistical Research Agency publish a recommendation to include a veteran question.
- End the disadvantage veterans in Northern Ireland face in the social care system compared to their contemporaries in Great Britain by exempting compensation payments from social care financial assessments.
- NHS England and the Ministry of Defence publish a timetable for completion of work to enable the transfer of clinical notes into the NHS as Service personnel leave the Armed Forces.
- Research, monitoring and interventions are put in place to reduce social isolation and loneliness in the veteran community. Local authorities include assessments of both the Armed Forces community and loneliness and social isolation in strategic needs assessments

Further detail on all the above recommendations can be found in the body of the document.

A full list of recommendations can be found in Appendix 1

4. Introduction

As the largest charity supporting veterans and their families, The Royal British Legion (the Legion) welcomes the focus upon the veteran population that is represented by the publication of this Strategy.

The organisations that came together to form the Legion in 1921 were created as a direct result of frustrations with the treatment of Service personnel returning from the First World War and the perceived inability of government and other public bodies to adequately provide for their care and future support. Since that time, the Legion has continued to make representations on behalf of those who have served and their families, the success of which has often depended on the political priority attached to the issue. The publication of the Strategy is therefore a welcome demonstration of the centrality of veterans and their families in this area of government policy.

In 2010-11, the Legion was the only organisation to openly campaign for the Armed Forces Covenant to be enshrined in legislation. We believe that the successful implementation of this recommendation has made an important difference to the attention given to the Armed Forces community, and acts as an additional moral force reminding government and society of their obligations to those who have made sacrifices to keep us safe.

It is therefore worth reiterating the precise words of the Covenant, which represents a commitment by the Government and the nation to all those who have served in the Armed Forces of the Crown, as well as their families. The Covenant is formed of two key principles:

- Those who have served in the Armed Forces, whether Regular or Reserve, those who have served in the past, and their families, **should face no disadvantage** compared to other citizens in the provision of public and commercial services.
- **Special consideration** is appropriate in some cases, especially for those who have given the most such as the injured and the bereaved.

It is right that these principles should underpin those of the Veterans Strategy, and they are important measures by which we assess proposals and action.

Context

Estimates of the size of the ex-Service community of veterans and their dependants indicate that it is currently likely to comprise approximately 5.3 million people¹. By the end of the period covered by the Strategy it is estimated that that figure will be around 4 million. This will be less than half the total in 2005 and represents a continuing downward trend in the size of the ex-Service community from its likely peak shortly after the Second World War.

However, these figures still represent a sizeable proportion of the general population, and so it is right that their particular needs and interests are recognised and acted upon. The proportion of the ex-Service community aged over 65 is likely to remain at around half of the cohort for the period of the Strategy. The most significant changes to the profile of the community are likely to occur after the Strategy period, with the departure in the 2040s of the last of those who undertook National Service.

¹ Based on the projections calculated for The Royal British Legion (2014), *A UK Household Survey of the Ex-Service Community* and publications since 2016 of the MOD *Annual population survey: UK armed forces veterans residing in Great Britain*

The needs of elderly veterans and their families will therefore continue to form a large part of the support required in the next decade. However, the new challenges faced by younger veterans with longer life expectancies means that the attention directed through this Strategy is to be welcomed. We would be cautious about creating too artificial and sharp a divide between different cohorts within the veteran community, as outlined in the Strategy.

It should further be noted that the size of the community has been shrinking and there is little to suggest that its current downward trajectory will not continue. It is therefore not unreasonable to argue that the concomitant costs to government of the ex-Service community may also reduce over time.

The Strategy

The Legion welcomes the engagement by government with the charity sector in the development of the Strategy. While we have retained the opportunity to make our own judgement on the final version, we are glad to have been able to engage in constructive dialogue about its content.

However, we are disappointed that the Government is not formally consulting on the Strategy itself, only on its implementation. The Strategy outlines a Vision and Principles, both of which, it is stated, are “applicable across all sectors of life: public, corporate, charitable and individual”². Given this assertion, it is disappointing that charities – and indeed business and individuals – have not been given the opportunity to comment on specific elements, including outcomes, which the Government deems to apply to them. Therefore, the comments we make in our response to the consultation range more broadly than the specific questions posed within it, although we have adhered to the themes and factors as outlined.

Another important part of the scope of the Strategy on which clarification would be welcome is its applicability to the families and dependants of veterans. Research by Forces in Mind Trust and the Families Federations found that families actively want to be involved in the transition process.³ Both the Vision and the Principles, and some of the consultation questions, specifically refer to families, but none of the Outcomes do. **The Legion believes that many, if not all, of the Outcomes should also refer to families, who are an integral part of the Covenant, being also at risk of disadvantage and worthy of special consideration.**

Similarly, we are disappointed that there has been little engagement with Crown Dependencies and overseas territories, who could have conducted their own consultation exercises in a similar manner to the devolved nations of the UK. **We therefore recommend that the Government extend the consultation process to cover these jurisdictions.**

The Legion is further concerned that the consultation fails to place the needs of veterans living overseas within scope. The needs of veterans resident outside the UK can be unique and varied. There is **benefit therefore to the Ministry of Defence (MOD) undertaking research to explore how its Strategy may be able to benefit overseas veterans.**

Lastly, the Legion remains concerned that the Strategy is applicable to England, Northern Ireland and reserved matters for the UK Government, yet there is minimal reference to the unique political and cultural structure of Northern Ireland in the document. When implementing outcomes from the Strategy, the Legion believes that a blanket approach

² HM Government (2018), *The Strategy for our Veterans*, HM Government, p.7

³ Forces in Mind Trust, Navy Families Federation, Army Families Federation, and RAF Families Federation (2018), *Lifting the Lid on Transition*, p.16

between the countries is inappropriate. For example, in Northern Ireland, Section 75 equality legislation has been presented by some commentators as a perceived barrier to the full implementation of the principles of the Covenant. Equally, Northern Ireland requires a greater focus on security of veterans throughout any Strategy recommendations. Therefore, **we recommend the Government produce a separate response to the consultation for Northern Ireland.**

The future

We note that the Strategy has a ten-year scope to 2028, and we welcome the commitment to review it at the halfway point in 2023. We also note, however, that the Strategy aims to set the conditions for the next 100 years, which we would suggest is somewhat ambitious given the changes observed over the last century. It is perhaps instructive to imagine what a ten-year Strategy on this topic might have looked like if published 20 years ago in 1998/99. The focus of its planning might not have foreseen the significant reshaping of the debate on and support for veterans prompted by the operations in Iraq and Afghanistan. **We would therefore urge continued flexibility in the implementation plan to reflect new requirements upon government prompted by changing circumstances.**

Definition of a Veteran

Although only referenced in the introductory comments to the Strategy rather than the consultation itself, we wish to reaffirm our clear support for the UK's definition of a veteran. The Strategy document notes the inclusiveness of the UK definition of one day's service as recognition of an individual's commitment, rather than what that commitment may constitute through factors that may be beyond the individual's control. Any change to the definition would cause considerable confusion and disruption. **The Legion therefore welcomes the reiteration of support for the current definition of veteran and the subsequent Covenant commitments that flow from it.**

Recommendations

- Amend the 2028 Outcome and Key Focus Areas to include reference to veterans' families.
- The Ministry of Defence maintain flexibility in the implementation plan of the Strategy for our Veterans to reflect new requirements upon government prompted by changing circumstances.
- The Government extend the consultation process to cover Crown Dependencies and overseas territories.
- The Ministry of Defence undertake research to explore how a veteran strategy may be able to benefit UK veterans living overseas.
- The Government produce a separate response to the consultation for Northern Ireland.
- The Government continue to define veteran as one day's service.

5. Cross-cutting Factor 1: Collaboration between Organisations

Since the First World War, a pattern of provision for veterans has arisen which comprises support from both government and the charitable sector. Which sector provides what support has changed over time and there are a range of views on where that balance should lie. Some advocate greater responsibility on the part of government, up to and including a dedicated government department, others argue that the role of government largely ends at discharge and that veterans should be treated as any other civilian. There is no right or wrong answer, but it should be recognised that the decisions taken by government about its role are policy choices and that the balance has tended to shift over time.

We note that the recent research by YouGov on perception of veterans reported that its “participants acknowledge that charities play an important role in veterans’ reintegration, however feel anger that they are relied upon to fill in the gaps. For many, it is a duty to provide state funded support – including financial, housing, skills and emotional support”.⁴ The research also recognised the need for coordination and collaboration and so it is right that this is recognised as cross-cutting factor.

The Legion welcomes the recognition in the strategy of the strength of the Armed Forces charity sector in providing tailored support to its beneficiaries. Charities have developed systems over the years to provide a range of targeted services and work closely both with each other and public bodies to get help to where it is needed. However, whilst there is a breadth of provision from both government and charities, it can still be the case that individuals find it difficult to navigate the system to find the help they need.⁵

Particularly significant current initiatives include the cross-organisation Casework Management System, and the Veterans’ Gateway, a single point of contact for veterans seeking advice and support. The Gateway is managed by a Legion-led consortium and involves a range of referral partners. It should be noted however that neither of these initiatives are cheap, and that **there is a role for government in ensuring their sustainability given the gap in provision that charities are filling through these services.**

The Armed Forces charity sector is recognised for its good degree of internal coordination.⁶ Such coordination extends to intra-sector funding. Over the last five years the Legion has distributed around £12m in grants to other organisations supporting the Armed Forces community, both national and local. Additionally, over the same period, the Legion has provided around £5m to other case working organisations in the sector for individual grants for beneficiaries.

In recent years there have been significant efforts to encourage private sector organisations to pledge their support to the Armed Forces Covenant, and to sign up to the Employer Recognition Scheme. Whilst a minority of businesses overall, some notable companies have signed up and it is encouraging to see this support for the Armed Forces community stretching beyond the public and third sectors. The Legion has highlighted the opportunities and challenges for veterans in the employment market and the benefits they can bring to

⁴ Latter, J, Powell, T, and Ward N (2018), *Public perceptions of veterans and the armed forces. YouGov research report*, p.37

⁵ Lord Ashcroft KCMG PC (2014), *The Veterans’ Transition Review*, p.129

⁶ Just one example of a collaborative project the Legion has been involved in is in Liverpool between Everton in the Community, One Vision Housing, Sefton Veterans and the Royal British Legion where football, volunteering, and employment opportunities are combined with measures to reduce isolation. More information on this partnership can be found at <https://www.forces.net/news/tri-service/everton-fc-shows-support-veterans>

employers⁷, so it is good to see that being recognised. However, we do note that the original proposal for private companies to get involved envisaged this participation to be in the form of pledging to work with local authorities, and offering benefits or services to the Armed Forces community.⁸ Whilst encouraging businesses in their role as employers, this aspect should not be overlooked, given the proportions of the veteran population who are not of working age. **For those businesses that do sign up to the Covenant, we advocate an enhanced and practical package of support and guidance.**

Veterans ID card

We note the introduction of the Veterans Identification Card, and if it enables more rapid verification of Service and access to public services, this will be welcome to many veterans. However, we would not wish for it to unintentionally become a de facto requirement to produce the card in order to access any service, as this could then act as a barrier. This would be particularly critical given that those with the most chaotic lives - and likely most in need of support - are those who are probably least likely to apply for a card. **Government systems for simple and efficient verification of Service by external organisations therefore continue to be a priority for coordination between charitable and public sectors.**

To complement the Veterans ID card, **the Legion recommends the Government explores the creation of an online Veterans UK account and accompanying app.** The app could have links to the individual's Veterans UK profile, where they could update their address details and access their military health records. Collaboration between multiple organisations involved in veteran service provision could be enhanced via the option to view available store discounts, find veteran-friendly GP surgeries and hospitals near them, and to read the latest Defence news in order to enable the individual to still feel connected to that community. For those in need of support, there is the possibility of linking the app to the Veterans Gateway, other military charities and both the Veterans UK and Armed Forces Covenant websites. In addition, there could be scope for veterans to apply online via the app for military compensation, and to track their claims. Taken together with the new ID card, this could potentially enable some veterans to instantly verify their Service history to service providers, including having a summary of their medical notes to hand when seeking medical assistance. There is precedent for such an app in the US, where a 'VetsApp' enables veterans not only to access Veteran Affairs (VA) services through their mobile device but also participate in veteran online chat forums.⁹ The Australian Department of Veterans' Affairs' online platform, 'MyService', also now enables veterans and their families to submit claims for Incapacity Payments online, which has reduced the average time it takes to process a claim.¹⁰

Sustainable funding

The charitable sector has been fortunate to receive the generous support of the public who continue to support the Armed Forces community through their donations. Charities have also benefitted from LIBOR funds and the continuing Armed Forces Covenant Fund which has enabled the funding of many worthwhile projects around the country. However, as the Government's paper accompanying the consultation acknowledges, "Armed Forces charities are facing significant financial challenges" and "it seems likely that the number of charities will also continue to reduce".¹¹ As a result, government cannot completely rely on

⁷ The Royal British Legion (2016), *Deployment to Employment*

⁸ HM Government (2010), *Report of the Taskforce on the Military Covenant*, p.3 and pp.10-11

⁹ More information about VetsApp can be found at <https://www.vetsapp.org/>

¹⁰ More information about MyService can be found at <https://www.dva.gov.au/myservice/>

¹¹ HM Government (2018), *The UK Armed Forces charity sector: a summary of provision*, p.6 and p.15

assumptions about the continued existence of charitable provision to underpin strategy delivery. **We would therefore urge the Government to be cautious in expecting the charitable sector to take on any significantly greater role in the provision of support without consideration of the resource implications, and that attention should also be given to activity that government might be able to take on.**

Recommendations

- The Government provide sustainable funding to meet the ongoing financial requirements of collaborative initiatives such as the Veterans Gateway and the Casework Management System.
- The Ministry of Defence and Defence Relationship Management encourage corporate signatories of the Covenant to make pledges that look beyond just their role as employers.
- The Ministry of Defence and Defence Relationship Management provide an enhanced package of practical support to corporate signatories of the Covenant.
- The Ministry of Defence review current Service verification procedures with an aim to learn best practice from other comparable sectors. This review should result in a simpler and more accessible Service verification process, which can be accessed securely by Service charities and the statutory sector.
- The Government explores the creation of an online Veterans UK account and accompanying app.
- The outcome of the Strategy consultation balance support provision by the charitable sector with consideration of what additional activity can be taken on by government.

6. Cross-cutting Factor 2: Coordination of Veterans' services

We wish to state at the outset that we take issue with the wording of the 2028 Outcome for coordination of veterans' services. The last part of the outcome introduces a caveat of "compared to the local population" to the Covenant principles. **No such caveat exists in the Armed Forces Covenant and we are concerned that it could provide cover for unacceptable variation in service provision.** Whilst the nature of devolved government means that some parts of the country have different systems and structures, the requirements of the Covenant are such that all veterans and families should be treated equitably.

We have not provided a score of 1 to 5 in response to the consultation question as we do not believe that an arbitrary measure of that nature would offer much insight into the effectiveness of government support across such a wide topic.

We note that recent research by YouGov found that 58% of people think that the Government does not properly look after those who have previously served in the UK Armed Forces, and only 15% think that it does. The research noted that this is a view more widespread among older people and also among those who personally know someone who has previously served.¹² The qualitative research also reported that, "participants say that it is the responsibility of the government, with many also citing the Ministry of Defence, to ensure that those leaving the armed forces (at any stage), are supported to reintegrate into society".¹³ In addressing perceptions of support for veterans, the coordination and extent of public sector provision is therefore an important factor.

Co-ordinating mechanisms

Over time, a variety of mechanisms have been suggested to enable more effective coordination of government and public sector provision on veterans' support. These have included proposals for a new government department with specific responsibility, a dedicated minister, a variety of new coordination committees and bodies, and independent or semi-independent oversight such as via an ombudsman or commissioner. Many of these initiatives have been tried either in parts of the UK or overseas. For the Legion, the precise mechanism used is less important than the political priority attached to the issue. One can have all manner of new systems in place but without sufficient attention, the drive to improve provision will be lacking.

The Legion believes some key tests would need to be met in introducing any new oversight or co-ordinating role. Firstly, any remit should cover the whole of the Armed Forces Covenant, and not just veterans. Secondly, it should have a statutory mandate and enforcement powers and be financially and structurally independent of government on a permanent basis. Linking it with the introduction of statutory legal force for the Covenant might be an effective way of addressing some of these requirements. Any weaker model runs the risk of becoming yet another source of reports and commentary that can be too easily ignored, would add little value and that the Legion would find difficult to support.

We are therefore cautious of creating new institutions for presentational reasons, but which lack sufficient funds or authority to make a real difference. That for us is a key test for the viability of any new proposals. Furthermore, structural changes should reflect the domestic context. Importing systems wholesale from other countries should be treated with caution given different cultural, political and military histories.

¹² Latter et al (2018), *Public perceptions of veterans*, YouGov research report, p.33

¹³ Ibid, p.34

There are a variety of government coordinating committees that touch on aspects of the Strategy – some quite new such as the Ministerial Covenant and Veterans' Board, whilst others are approaching their own centenary, such as the Veterans Advisory and Pensions Committees and the Central Advisory Committee on Compensation. Knowing how to effectively influence matters affecting veterans can be challenging for stakeholders trying to navigate the process and ascertain whether they are being offered a genuine say. The voice of veterans and those who advocate for them is a crucial element that should always be reflected in these structures. **We suggest that the MOD consider whether they gain sufficient first-hand insight into the needs and priorities of veterans at a local level through current structures. The examination of options such as a local presence for Veterans UK and the MOD may be worthy of consideration.**

Local Government structures

Whilst there is an important role for central government in providing services and a lead on issues amongst the Armed Forces community, many of the public bodies with which veterans interact on a regular basis will be locally based. Local authorities and combined authorities such as the Greater London Authority all provide or commission services to support the veteran community. All local authorities in Great Britain have signed the Covenant and their work to meet local Covenant pledges was examined in a 2016 report.¹⁴ Whilst there are excellent local examples of good practice by individual councils¹⁵, we were concerned that the report's research found that some quite basic activities to deliver on the Covenant are still not being done, including some that the Legion suggested when local authority Covenant pledges were first introduced via Community Covenants. For example, 29% of councils did not have a webpage with information for members of the Armed Forces community, and almost 42% did not have an action plan that is monitored and reviewed.¹⁶ **We would urge the Government to work with stakeholders to develop a mechanism for monitoring implementation of local authorities' implementation of the core Covenant delivery infrastructure, which could be an important initial measure of progress.**

In the last couple of years, a number of posts based in councils, or groups of councils, to lead on Covenant delivery have been supported by the Armed Forces Covenant Fund. Anecdotal evidence, referenced in our focus groups, suggests that a number of these posts have been effective at driving local authority delivery:

"The Government is encouraging councils to work together better and Wiltshire Council, which recent taken on board a leading role, has employed an ex-Army Major with Covenant funding and the role is specifically to do just that – to go across all the south west councils and regional authorities and get them to, wherever possible, work together... education [of local authorities] is absolutely the key thing, educating council staff and council leaders... it is already starting to have an effect in the south west." (focus group participant)

¹⁴ Shared Intelligence, the Local Government Association and the Forces in Mind Trust (2016), *Our Community – our Covenant: Improving the delivery of local Covenant pledges*

¹⁵ Focus group participants in Leeds particularly drew attention to Northern Yorkshire where the county council leads a quarterly coordination meeting between several agencies, including the local Armed Forces leads, resulting in good knowledge sharing, collaboration on issues such as housing and relationship building between charities, the local authority, the Armed Forces, and services such as the local clinical commissioning group.

¹⁶ Shared Intelligence (2016) p.19

However, we are concerned about the sustainability of these roles and would not wish to see valuable work fall away once the initial funding comes to an end. Nor should it become the case that local authorities are able to argue that they can *only* deliver on the Covenant with additional funding. **We would welcome an evaluation of these posts, which may support the case for further funding.**

It is equally important that existing Armed Forces Champions in local authorities are provided with appropriate training and direction on the responsibilities of their roles, as well as appropriate resourcing. It was a repeated suggestion through our focus groups, including from current council Armed Forces Champions, that **local authority champions should be offered nationally shared performance targets and responsibilities, potentially through a nationwide induction scheme and dedicated funding streams.**

As well as councils, there are other local public bodies with which veterans and their families interact, including the National Health Service, further and higher education institutions, branches of Jobcentre Plus and arms-length or contracted bodies such as housing associations. Some of these interactions will be more common than those with councils. However, we do not feel that sufficient examination has been undertaken of the extent to which these organisations are meeting Armed Forces Covenant commitments or have even signed it. Research has been undertaken on Covenant delivery by organisations other than local authorities, but its primary focus has been on business, and on the role of organisations as employers rather than on Covenant delivery to veterans.

Consideration needs to be given as to what measures need to be taken should insufficient priority be given to Covenant delivery by public bodies and others. This does require the ability to assess whether the Covenant is being delivered. But the option of giving statutory legal force to the Covenant principles should be on the table. We would suggest the tenth anniversary in 2021 of the Covenant inclusion in the Armed Forces Act would be an appropriate deadline by which to consider whether firmer measures are required.

Northern Ireland

There are a number of bodies in Northern Ireland that already facilitate co-ordination and communication on veterans' services and issues, including the Armed Forces Liaison Forum, the Veterans Support Office and the Northern Ireland Veterans' Support Committee. At local authority level, every council currently has a Veterans Champion. However, these posts can be politically affiliated, which may result in some veterans feeling unable to approach their champion for support. Differing powers for local authorities between nations also mean that these champions may find themselves restricted in their ability to co-ordinate and deliver services for veterans compared to their counterparts in Great Britain. **The Government should keep existing co-ordinating functions within Northern Ireland under review and ensure appropriate evaluation takes place.**

Recommendations

- Remove the caveat "*compared to the local population*" from the 2028 Strategy Outcome.
- The Government apply a test of sufficient funds and authority to the creation of any new government coordination structures.
- The Government review structures for central government support of veterans at the local level.

- The Ministry of Defence and the Ministry of Housing, Communities and Local Government monitor local authorities' implementation of the core covenant delivery infrastructure.
- An evaluation is carried out of existing local authority Covenant delivery posts.
- Local authority champions are provided with nationally shared performance targets and role responsibilities, potentially through a nationwide induction scheme and dedicated funding streams.
- Further research undertaken into Covenant delivery by public bodies other than local authorities.
- The Government retain the option of giving legal force to the Covenant, with a deadline of 2021 for a decision on whether this option is required.
- The Government keep existing co-ordinating functions within Northern Ireland under review and ensure appropriate evaluation takes place.

7. Cross-cutting Factor 3: Data on the Veteran community

Asking the question

The Legion agrees with, and welcomes, the statement in the consultation document that “Data is essential to understand the Veteran community, contributing to a robust evidence base which can inform policy making and service delivery more effectively”.¹⁷ The need for data to be routinely captured by services accessed by veterans, and for this data to be shared appropriately and inform the provision of those services, is a recommendation for which the Legion has long called.¹⁸

Despite the repeated calls for data capture from the Legion and other stakeholders, we are concerned that a question capturing membership of the Armed Forces community (henceforth referred to as ‘the question’) is still not routinely being asked within local authorities, healthcare settings, Jobcentre Plus and other non-statutory providers. In many of these areas, enhanced support and provision is available that tailors services to the specific needs of the veteran community; however that support is being restricted through a lack of knowledge. Without understanding the need to ask the question, and the principles of the Armed Forces Covenant that underpin it, frontline staff may skip or ignore it. Recent research has highlighted that more needs to be done to upskill frontline staff in local authorities with regard to the Armed Forces Covenant. Over a third of all councils in Wales, England and Scotland have no mechanism in place for briefing staff on the Armed Forces Covenant (39%). Within the Armed Forces community, only 4.5% felt that councils had a good understanding of their needs.¹⁹ We therefore maintain **there should be a standardised question for public bodies to ask in order to improve identification of members of the Armed Forces community and, in turn, improve signposting and awareness.**

Where we urge some caution with this approach is in Northern Ireland. Security concerns are regularly cited as a barrier to disclosure of veteran status, with many veterans unwilling to confide in officials of whom they do not know the background. However, we recommend that the Government look at alternative data capture options rather than amending a standardised question. In our focus group held in Northern Ireland, it was mentioned that veterans feel more comfortable disclosing in peer-to-peer settings rather than to unknown officials. We would therefore hope that procedures could be established to capture alternative points of identification, and that frontline staff are able to offer advice on tailored veteran support services without requiring disclosure from the veteran.

In England, welfare benefits are an area where enhanced collection and sharing of data between the MOD and the Department for Work and Pensions (DWP) could be improved. At present, the lack of data published on veteran claimants of benefits such as Employment Support Allowance (ESA) restricts third sector advice agencies from being able to accurately identify how many veterans claim specific benefits, and any barriers to successful claims. This data would enable the Legion and others to tailor service provision accordingly. Equally, Service injury compensation claims cut across another benefit such as ESA or Universal Credit, more accurate and seamless data sharing between departments would ensure that changes to income due to inaccurately implemented disregards would be reduced. The Legion therefore recommends that **all current benefit application forms are reviewed to assess the feasibility of the inclusion of a veteran status question.**

¹⁷ HM Government (2018), *The Strategy for our Veterans*, UK Government consultation paper, p.14

¹⁸ The recommendation for frontline staff in statutory bodies to ask the question has appeared in multiple Legion evidence submissions, research reports, consultation responses and manifestos, notably in the Legion’s Greater Manchester manifesto 2017 and the Legion’s Welsh Assembly manifesto 2016.

¹⁹ Shared Intelligence (2016)

Similarly, data sharing between statutory agencies should not be restricted to government departments. A War Disablement Pension recipient may currently have to declare their Service history and claim details not just to DWP but to varying tiers of local authorities depending on the service accessed. One focus group participant recalled having to tell agencies and bodies about his Post Traumatic Stress Disorder on eight separate occasions in order to access a full range of services, support and treatment. The Legion therefore recommends that **the Government, specifically the Ministry of Housing, Communities and Local Government (MHCLG) investigate the feasibility of introducing a “tell me once” service for veterans that can enable data sharing on an individual between different tier authorities and statutory agencies.**

2021 Census question

The Legion strongly welcomes the recommendations published by both the Office for National Statistics (ONS) for England and Wales, and National Records Scotland (NRS), to include a new question in the 2021 census asking for veteran status. This recommendation follows the Legion's *Count Them In* campaign²⁰ and is a significant step forward in data collection on the veteran community in the UK. For the first time, the census will enable local and national government, as well as other service providers and stakeholders, to see accurate demographics and numbers by small geographies. The Legion and others will be able to use this information to provide services where they are most needed, and allows local authorities to strategically plan according to the needs of the local Armed Forces community. **The Legion recommends that the new veteran status question is included in the Census Order when put before parliament and that parliament approves it.**

The statistical agencies of England and Wales, and Scotland, have recommended the inclusion of a new veteran census question. However, the Northern Ireland Statistics and Research Agency (NISRA), is yet to do so. Whilst understanding the need for security precautions to be made in the context of the Northern Ireland 2021 census, we believe that accurate data on the UK veteran community needs to include the Northern Ireland cohort if the Government wants to provide support to meet the needs of the whole community. **We therefore recommend that the NISRA publish a recommendation to include a veteran question, as closely aligned to the NRS and ONS question as feasible, to provide a comparable UK wide assessment of need.**

Other government data sources

The Legion has welcomed the publication of the Annual Population Survey (APS) data by the Ministry of Defence for 2014, 2015, 2016 and 2017. The large sample size and standardised questioning for comparison to the general population has proven valuable in understanding the needs of those veterans who reside in Great Britain. We recognise the limitations of this dataset, particularly in its inability to provide data on veterans resident in Northern Ireland, therefore we await publication of the University of Ulster's work mapping the needs of the veteran community in Northern Ireland. Nevertheless, we are disappointed that the 2017 Annual Population Survey veteran dataset includes notification that these publications will cease, preventing the mapping of trends and need over time or the underpinning of any monitoring of the effect of the Veteran Strategy. **We therefore recommend that the Government reconsiders its decision and commits to continuing to publish APS veteran data annually for the years 2018 onwards.**

²⁰ For more information on The Royal British Legion's Count Them In campaign please visit www.britishlegion.org.uk/census

Furthermore, the Legion would welcome commitment from the Government to undertake analysis of other existing data sets in order to extract veteran insight. From 1946 onwards, the UK has undertaken one of the largest cohort studies in the world via the UK Birth Cohort Studies. The Birth Cohort Studies have followed cohorts of typically 17,000 from birth onwards in 1946, 1958, 1970 and 2000. Currently around one in ten of the UK population are members of the ex-Service community, a percentage that has decreased over time^{21,22}. We are confident therefore that within these four cohort studies there are likely to be a number of veterans, serving personnel and members of wider Armed Forces community. We are not aware of any study that has used data from these four longitudinal datasets to look at the life trajectories, emerging health needs and profile of those who enter Service in comparison to other occupational areas. Such data would enable insight into the effect Service has over the course of a lifetime, comparable between conflicts. **The Legion therefore recommends the Government commission analysis of all cohorts of the UK's Birth Cohort Study to identify members of the Armed Forces community and enable longitudinal research of veteran life trajectories in comparison to other occupational backgrounds.**

Data capture and sharing in the charitable sector

There are existing examples of good practice in data sharing amongst the veteran charity sector, notably the mapping of need carried out by both Northumbria University and Ulster University. However, these exercises also exemplify the difficulties in such projects where anonymisation of datasets restricts granularity and barriers to data sharing may be caused by resourcing.

Furthermore, we are aware that through our experience of the above collaborative mapping of needs exercises, a barrier to collaboration has been the reluctance of Veterans UK to share their data. In order for collaboration to work, the onus has to be on all parties to be willing to act as equal partners in data sharing.

The mapping of need project is not alone in the charitable sector as an example of data sharing for the benefit of the beneficiary community. Cobseo charities with a grant giving function share casework via the Form A process. The rollout of forthcoming improvements to the shared Case Management System will improve this collaboration yet further. Whilst not imposing regulations that restrict the shared case management system from working, general awareness raising of data mismanagement in the national press around the rollout of GDPR has increased beneficiary reluctance to consent to their details being shared.

The shared case management system used amongst Cobseo partners further highlights the difficulties in creating comparable datasets between organisations to enable effective needs mapping and resource allocation. Differing organisations require different outcomes to be measured and different data to be captured in order to fulfil their service requirements. However, Help for Heroes, the Legion and the Officers Association are amongst those within the sector who have implemented a shared Independence Star measurement tool for monitoring impact.²³ The independence star measures improvements in outcomes in six key areas: Finances; Housing; Health; Activities; Social life; and Wellbeing. **The Legion recommends wider take up of the Independence Star methodology amongst those providing services to veterans and their families.** A comparable measurement tool across the sector will enable stronger collaboration between providers to capitalise on strengths in provision.

²¹ The Royal British Legion (2014), *A UK Household Survey of the Ex-Service Community*, 2014.

²² The Royal British Legion (2004), *Profile of the Ex-Service Community in the UK*

²³ Further information about the independence star can be found here: www.outcomesstar.org.uk/using-the-star/see-the-stars/independence-star/

Additionally, agreed outcome measures across statutory and civil society are only one area where the standardisation of data can be improved. As mentioned above, different organisations require different data capture in order to provide their service in a timely and efficient way. However, insight into the needs of the veteran community, and mapping of needs exercises, would be improved by common data capture fields. For example, there is limited knowledge on the numbers and needs of Commonwealth troops accessing support from charities. Pearson and Caddick, in their 2017 report into the needs of Commonwealth personnel and their families, recommend that, “data on Commonwealth Personnel, veterans and families seeking support should be captured at the earliest point of contact with welfare services to assess patterns of need and inform future service provision. This data would be collected not to differentiate but to provide a better understanding of Commonwealth needs.”²⁴ In not capturing Commonwealth status, the needs of a specific community may be going unrecognised. This is equally true of other hard to reach or minority groups, such as the LGBTQ+ community within the veteran population, or groups with unique needs such as the reservist veteran community. **The Legion therefore recommends that the Government convenes a stakeholder working group to establish common metrics and demographics for data recording across the sector.**

Effective sharing of comparable measurement against sector-agreed key performance indicators requires a resourced platform to host the data. Both Northumbria University and the Forces in Mind Trust Research Centre already go some way to providing infrastructure for such a platform, but more could be done. **The Legion recommends that the Government looks at good practice within the Housing sector, where the membership body Housemark provides a data warehousing service.**²⁵

Delays in data sharing

The Legion believes that data sharing and data collaborative projects only provide maximum benefit to the beneficiary when it happens seamlessly and in a timely manner. As mentioned in cross cutting factor one, many of the service providers within the veteran and wider Armed Forces community sector are reliant on verification of Service in order to confirm eligibility for support. This is especially true for smaller providers with limited resources. The current arrangement provides a serviceable system, however delays in verification can defer support provision and exacerbate hardships. Anecdotal evidence from focus groups found that Service verification can take up to 40 days. For many beneficiaries, support is only sought at crisis point having potentially overcome stigma in the process. Unnecessary delays risk reinforcing stigma and turning people away from charitable or statutory support. There are good practice examples of online instant verification services such as those provided by credit checking agencies. **The Legion recommends that the MOD review current Service verification procedures with an aim to learn best practice from other comparable sectors. This review should result in a simpler and more accessible Service verification process, which can be accessed securely by Service charities and the statutory sector.**

The Legion has similar concerns with regard to delays in data sharing within the administration of the Veterans' Medical Funds. A typical delay of up to six months for the appropriate medical information and confirmation of Service attributability significantly impacts on the quality of life of the veteran waiting on vital medical intervention.

²⁴ C Pearson and N Caddick (2018), *Meeting the Needs of Commonwealth Personnel and Families: A Map of Service Provision*, p.22

²⁵ Further information on Housemark can be found at <https://www.housemark.co.uk/>

Lastly, it was raised in our focus groups that Service verification can be more difficult when supporting divorced and separated spouses:

“...Especially if you have divorced spouses and there’s no contact. If the service member won’t sign the document, then it becomes highly challenging to get service verification so an ex-spouse and children can get support.” (focus group participant)

Recommendations

- Central government, local government and statutory service providers introduce a standardised question for public bodies to ask in order to improve identification of members of the Armed Forces community and, in turn, improve signposting and awareness.
- All current benefit application forms are reviewed to assess the feasibility of the inclusion of a veteran status question.
- The Government, specifically the MHCLG investigate the feasibility of introducing a “tell me once” service for veterans that can enable data sharing on an individual between different tier authorities and statutory agencies.
- The new veteran status question for the 2021 census is included in the Census Order when put before parliament, and that parliament approves it.
- NISRA publish a recommendation to include a veteran question, as closely aligned to the NRS and ONS question as feasible, to provide a comparable UK wide assessment of need.
- The Government reconsider its decision to cease publication of the Annual Population Survey veteran data and commit to continuing to publish the data annually for the years 2018 onwards.
- The Government commission analysis of all cohorts of the UK’s Birth Cohort Study to identify members of the Armed Forces community and enable longitudinal research of veteran life trajectories in comparison to other occupational backgrounds.
- Wider take up of the outcome measurement star methodology amongst those providing services to veterans and their families.
- The Government convenes a stakeholder working group to establish common metrics and demographics for data recording across the sector.
- The Ministry of Defence learn from good practice within the Housing sector, where the membership body Housemark provides a data warehousing service, with the view to facilitating a similar process in the veteran sector.
- The Ministry of Defence review current Service verification procedures with an aim to learn best practice from other comparable sectors. This review should result in a simpler and more accessible Service verification process which can be accessed securely by Service charities and the statutory sector.

8. Cross-cutting Factor 4: Public Perception and Understanding

Introduction

Public understanding of the Armed Forces community determines societal and political will to support Service personnel, veterans and their families, as well as the type and extent of support services available to them. It is therefore important to ensure that, as far as is reasonably possible, public perceptions of both the serving and ex-Service community broadly reflect reality. This is especially so in a challenging financial climate, where it is vital that limited funds are deployed to best effect, where need is greatest. Misperceptions about the nature and scale of need can result in funds being diverted to the wrong projects, which is in neither the taxpayer's nor veterans' best interests. In addition, certain public perceptions can and do act as a barrier to the prospects of Service leavers and veterans in civilian life, particularly but not exclusively in terms of employment, and can hinder recruitment into the Armed Forces.

The Legion maintains that a more balanced conversation about veterans can and should be achieved, although we remain wary of efforts to portray any disconnect between public perceptions and reality as either substantial or ubiquitous. Indeed, in many respects public perceptions are positive, accurate, and encouraging. Recent research into public perceptions of veterans, for instance, has found that attitudes towards those who have served are overwhelmingly positive, with respondents recognising veterans' strong team working skills, resilience under pressure, and effective leadership qualities, with positive word associations also often felt more keenly than negative word associations²⁶. The same survey also found that respondents across all age groups registered above 60% when asked if veterans make a valuable contribution to society, which reflected a similarly good and positive understanding of the benefits of a military career and the skills acquired in Service. All of the above suggests that messaging concerning the positive attributes of Service personnel and veterans is successfully cutting through.²⁷

There are, however, some concerning negative and inaccurate perceptions that require further analysis and challenge where appropriate. Focus group participants, many of whom were veterans themselves, felt that the public misunderstood veterans' experience. It is important to note from the outset though that not all negative perceptions are necessarily inaccurate, and the Legion accordingly resists attempts to link the two together in all cases. For instance, Ipsos Mori research found that 51% of respondents correctly identified that high-risk drinking (defined as alcohol consumption that results in ill effects to an individual's health or safety) is more common in the Armed Forces than among the general public, and that 45% of respondents correctly identified that the unemployment rate is higher for former non-officer veterans.²⁸ In this way, we must be careful not to assume that all negative impressions are misperceptions, which could then lead to policy concerns being dismissed. In the same vein, it should also be recognised that we do not have sufficiently robust and comprehensive data on the ex-Service community to say with absolute certainty that public perceptions are wholly inaccurate: whilst existing data may reveal public concerns to be inflated, the degree to which they are is at present hard to definitively determine. Indeed, the recent YouGov survey found very little distinction between the negative associations – including around problems adjusting to military life, mental health challenges, difficulty finding a good job, and homelessness – reported by respondents who knew someone who had previously served and respondents who did not. Whilst that does not mean that the

²⁶ Latter et al (2018), *Public perceptions of veterans*, YouGov research report. p.16

²⁷ Ibid

²⁸ Ipsos Mori (2015), *Hearts and Minds: misperceptions and the military*

perceptions of either group are more reflective of reality than official data would have us believe, it does suggest that we need to consider why public opinion and official data differ so greatly at times. One possible reason for this, besides a lack of data, could be that we are witnessing something of an echo chamber effect, whereby inaccurate perceptions in public discourse are influencing veterans' perceptions of themselves and their peers. To break through this echo chamber, the Legion recommends that **all government departments conduct proactive and positive social media campaigns with content outlining measures being taken to support veterans or services already available to them, incorporating accurate and engaging stories and facts about the veteran community.**

Where public perceptions are both negative *and* inaccurate, this might arguably reflect the public's limited understanding of the individuals enrolled in, and roles performed by, the UK Armed Forces. For instance, the term 'veteran' typically triggers initial images of old, white men among the UK public, with younger, female or BAME veterans barely mentioned²⁹. One veteran in our focus groups commented, "I've been told I can't be a veteran, I'm a woman. I quickly put them right on that." The public also estimate that 61% of veterans have faced dangerous or traumatic situations³⁰, which hints at an overriding public impression that the Armed Forces are principally and routinely involved in combat operations, as opposed to other roles such as supporting humanitarian efforts, tackling poaching and smuggling, or providing logistical support to local communities. The effect of this rather narrow understanding of the Armed Forces is that the public are accordingly inclined to regard veterans as likely to have been physically or mentally damaged by Service. For example, polling by Lord Ashcroft revealed that survey respondents felt that 54% of veterans had a physical, emotional or mental health problem, with one in four suggesting the figure could be as high as 70%³¹. Research by Ipsos Mori, meanwhile, revealed that a large majority of the public (65%) think that Post Traumatic Stress Disorder (PTSD) is much more common among the Armed Forces than the general public, with only 6% correctly identifying that PTSD levels are generally similar across the civilian population and the Armed Forces community, with the exception of certain groups.³² The Ipsos Mori research further revealed that a majority (53%) think that the suicide rate is higher among the Armed Forces population than the public, when research suggests that it is lower overall, despite some exceptions in certain cohorts³³, and that 40% of the public think that homelessness is higher among the Armed Forces than the general public, when robust data to evidence this hypothesis is limited to within London.³⁴

The difference between the public's largely negative perception of veterans' health and wellbeing, compared to more favourable datasets that exist, is both significant and concerning. Some of the pervading myths concerning the health and wellbeing of veterans are pernicious: they can damage the employment prospects and morale of individuals, result in projects being either overfunded or underfunded, and could potentially, over time, result in the public regarding veterans as net burdens to society and the public purse. Whilst it is, therefore, entirely appropriate that issues affecting the ex-Service community are raised in a public setting so that they might then be addressed, it is equally important that such issues are presented in their proper context and portrayed responsibly. For instance, whilst it is right to raise the profile of conditions such as Post Traumatic Stress Disorder (PTSD), and address stigma surrounding poor mental health in the process, it is vital that conditions such as PTSD are not portrayed as an inevitable consequence of Service nor detract attention from lower level but more widespread conditions.

²⁹ Ibid p.18

³⁰ Lord Ashcroft KCMG PC (2017), *The Veterans' Transition Review, third follow up report*, p.6

³¹ Ibid. p.5

³² Ipsos Mori (2015), *Hearts and Minds: misperceptions and the military*

³³ Kapur et al. (2009), *Suicide after leaving the UK Armed Forces – A Cohort Study*

³⁴ Mayor of London (2018), *Chain Annual Report Greater London April 2017 - March 2018*

If the Government is to successfully rebuff those perceptions of veterans that are both negative *and* inaccurate, it is important to recognise that different demographics perceive veterans differently and appear to form their opinions based on differing sources. As such, efforts to address misperceptions will require tailored messaging for specific audiences. For instance, among the civilian population, research suggests that people aged 35-44 years old generally maintain that veterans are abandoned, or at least not sufficiently supported (43% and 42% respectively), whilst people aged 16-24 years old are inclined to regard veterans as mentally damaged or unwell (54%), and those aged 55-64 years old and 65 years and over most strongly believe that society doesn't value those who have previously served (45% and 43% respectively)³⁵. These figures are perhaps not surprising or specific to the veteran community, arguably reflecting wider generational trends in attitudes; younger people are typically more aware of, and willing to talk about, mental health, whilst middle-aged individuals often articulate concern about the provision of state support, and older people often lament a perceived decline in respect towards elders and authority figures. However, of note is the reported variance between veterans' perceptions of other veterans in comparison to civilians' perceptions of veterans. For instance, recent research revealed that 53% of survey respondents who had served thought that military Service had positively impacted upon them in civilian life, compared to 26% who thought it had negatively done so. For respondents with no connection to the military, the figures were reversed: just 27% thought it positively impacted upon veterans whilst 42% thought it negatively did so.³⁶ To re-balance the narrative on veterans, therefore, **government, charities and Employer Recognition Scheme award winners should make greater use of veterans themselves as ambassadors in engagement campaigns and media features on veterans' issues**, providing positive role models for their peers and presenting an alternative image of veterans to the public. **The Ministry of Defence should further be prepared to respond more robustly to negative and inaccurate media stories on veterans through the provision of more substantive responses in the Defence in the News blog and on the Armed Forces Covenant microsite, drawing on research rather than solely providing short spokesperson quotes.**

In terms of the sources shaping public perceptions of veterans, TV documentaries and TV news are reportedly the biggest influencers of public opinion regarding the ex-Service community overall, and among older people particularly.³⁷ **The MOD could do more to proactively provide positive news stories and respond to negative ones with spokespeople who can counter misinformation, preferably subject matter experts or veteran ambassadors with diverse backgrounds, as opposed to politicians.** At present, often the only time the public see veterans in an inspiring and positive light on TV is through coverage of the Invictus Games. Whilst this is encouraging, the Legion is aware that taken in isolation, such coverage can have the unintended effect of playing into existing stereotypes of veterans being either mentally or physically affected by Service. A focus group participant commented, "Paralympics and Invictus are one of our biggest problems in terms of perception. The reality is people think we are broken." Charities too are partly responsible for some of the more negative perceptions of veterans, with 25% of people saying they were influenced by charities, whilst 16% said they were influenced by politicians, who sometimes focus on negative stories to make wider points. TV drama, social media and films also play a significant role in formulating opinions on the ex-Service community, especially among younger people.³⁸ What is particularly interesting with this cohort, and which may be reflective of the preferred influencing mediums, is that portrayals of US veterans are more

³⁵ Latter et al (2018), *Public perceptions of veterans*, YouGov research report, p.15

³⁶ Ibid. p.8

³⁷ Ibid. p.54

³⁸ Ibid. p.54

likely to be recalled by younger people than UK veterans.³⁹ This is important as US veterans have different health outcomes and support services available to them, making comparisons unhelpful in public debates in the UK. **The Government should therefore encourage politicians and charities to use more balanced language in their debates and promotional material and be prepared to challenge unhelpful comparisons with US provision and outcomes.**

Taken together, recent research concerning public perceptions of the Armed Forces community, and the sources influencing these perceptions, outlines the scale of the problem facing government in tackling misperceptions of the veteran community: public perceptions are complex, ingrained and influenced primarily by sources outside of direct government control. Nevertheless, there are some steps government can take to try and influence the nature of public discourse on veterans, although it should take care to ensure that attempts to redress misperceptions are not perceived as government being dismissive of issues or trivialising concerns.

Recommendations

- All government departments conduct proactive and positive social media campaigns with content outlining measures being taken to support veterans or services already available to them, incorporating accurate and engaging stories and facts about the veteran community.
- The MOD respond more robustly to negative and inaccurate media stories on veterans through the provision of more substantive responses in the Defence in the News blog, drawing on research rather than solely providing short spokesperson quotes.
- Government, charities and Employer Recognition Scheme award winners make greater use of veteran ambassadors to provide a more positive and balanced portrayal of veterans.
- The MOD improve the Armed Forces Covenant microsite by including more facts, research, and inspirational veteran ambassador stories within the veteran's area of the site.
- The MOD put forward authoritative individuals, whether experts or military personnel, to provide counter arguments to misleading or inaccurate stories, and be more prepared to challenge unhelpful comparisons with US provision and outcomes.
- The Government encourage politicians and charities to use more balanced language in their debates and promotional material.

³⁹ Ibid. p.55

9. Cross-cutting Factor 5: Recognition of Veterans

The Ministry of Defence and the Forces in Mind Trust recently commissioned research that found 87%⁴⁰ of the UK public say they have respect for ex-Service personnel. This regard enables the Armed Forces charity sector, which relies on generous public donations, to deliver vital support to the UK's serving and ex-Service communities. There are also numerous visual demonstrations of the high esteem in which veterans are held across the UK, notably the high attendance at Armed Forces Day events, televised coverage of the Invictus Games, and the presence of serving personnel and veterans at major sporting events. Many Legion branches have also reported steadily increasing participation at local Remembrance parades. Whilst public expressions of support are perhaps less frequent and more reserved in the UK than in the US, with which comparisons are made, this should not be mistaken for indifference. In the Legion's experience, the public's respect and admiration for the UK Armed Forces may be quiet but it is widespread and, crucially, sincere. The respect shown appears to reflect a genuine desire to improve the wellbeing of veterans, either through financial support of military charities or mobilising in support of campaigns to change government policy. In this way, the Legion maintains that any government measures to demonstrate greater recognition for the ex-Service community should also be meaningful and serve to either address a particular problem or tangibly improve a veteran's quality of life. **In short, the ultimate way to recognise an individual's military service is to ensure that they, their families and their comrades receive the care and support they need, when they need it.**

Notwithstanding the above, there is some validity to pervading perceptions that particular groups of ex-Service personnel receive greater recognition than others, most notably Second World War veterans and those who served in more recent conflicts in Iraq and Afghanistan. In contrast, those who undertook National Service (perhaps in Aden, Suez or Malaya), who saw no direct action, or who fought in Northern Ireland or the Balkans, often report to the Legion feeling overlooked in national conversations about the ex-Service community. There are many possible, often interconnected, reasons for this. For instance, in our experience the veterans who are most likely to report feeling ostracised or neglected often served on operations that either saw no direct engagement with the enemy or failed to result in decisive victories; are connected to operations associated with the end of Empire; and/or occurred a number of decades ago. This has generally resulted in a lack of public awareness about these operations, which in turn has led to the people who served in these conflicts being absent from the national conversation on veterans. Whilst the Second World War, and by extension its veterans, remains a source of national pride that is frequently portrayed positively in the media and taught in schools, the same cannot be said for many other pre-Afghanistan and Iraq conflicts, whose veterans may consequently feel aggrieved that their Service is not sufficiently respected. Veterans of Afghanistan and Iraq appear to have escaped this fate by virtue of both the shorter passage of time and greater public awareness of both the conflicts themselves and the issues affecting some of those who were deployed there.

Conversely, it is important to recognise that there are also some veterans who do not wish to be identified as ex-Service at all, or who at least would prefer not to be defined by it. This can be because of genuine or perceived security concerns, which is especially the case for those veterans residing in Northern Ireland, or because the individual served only briefly in the context of their whole career, or perhaps did not enjoy their time in Service. **Both government and wider society should, therefore, endeavour to respect the wishes of those veterans who do not wish to be defined by, or singled out because of, their**

⁴⁰ Ibid p.64

veteran status, ensuring that veterans are able to opt-into measures intended to raise their profile.

The above is important because it demonstrates firstly that the ex-Service community is not a homogenous entity and that, secondly, perceptions can be just as important as reality when it comes to veterans' sense of recognition. All veterans, regardless of when or where they served, are entitled to the same practical support from government and statutory service providers, yet how the public perceive their Service can be equally as important to some veterans. Whilst the Government's principal focus, therefore, should be on the practical support and services offered to veterans and their families, measures should be undertaken to also increase visibility and improve understanding of the Armed Forces: by focusing on what individuals actually do in Service, removing some of the mystique and bringing the public closer to the military, the Government could facilitate greater appreciation for the UK's serving and ex-Service community.

Increasing visibility

There are a number of ways in which visibility of the Armed Forces could be increased.

Greater and more routine use of Open House Days, which enable members of the public to go behind the wire to view facilities and learn more about what the military are doing in their area, could help raise awareness of the day-to-day nature of military life and facilitate a more balanced discussion of the work of the Armed Forces. This should be subject of course to security assessments. Similarly, as part of the Armed Forces' commitment to local Covenants, **military units could do more to offer their services and/or spare capacity on bases to their local host council or community interest groups.** This could include, for example, pairing with a local council gym to run a special 'boot camp' fitness class. Expanding the military's outreach programme in this way could help demonstrate that local Covenants are beneficial to *all* parties, thereby allaying concerns expressed to the Legion by some councils that local Covenants can be rather one-sided in terms of what is offered. Outreach activity would also help embed the military in the activities of their host community, better preparing serving personnel for life outside the Armed Forces. In this way, **there may also be scope for holding some military ceremonies, such as the presentation of medals and awards, in a civic setting like a Town Hall, as opposed to on base.** This would provide an opportunity for the recipient to be honoured by both the military and local community, and for civilians to learn more about military pursuits and practices.

Whilst the Legion recognises that the wearing of military uniforms when off-duty should be a personal choice for security reasons, the **MOD should nevertheless facilitate the wearing of military uniforms on specific occasions throughout the year.** Civilians may consequently become more aware of the military's presence and be able to demonstrate spontaneous, personal acts of recognition should they wish. **It is also important that appropriate incumbent Service Chiefs are more routinely used for public relations exercises;** they are non-partisan and respected subject matter experts who have the potential to cut through public hostility and scepticism towards politicians and are arguably best placed to articulate the work of serving men and women. The more routine sight of military chiefs on television screens would further serve as a reminder of the ongoing and non-conflict related work of the UK Armed Forces and could potentially help de-politicise some Armed Forces welfare issues. Additionally, with more women now reaching the rank of one star and above, greater visibility of senior military personnel could well result in a more positive portrayal of the Armed Forces in terms of its diversity.

Most of the above suggestions involve increasing the visibility of serving personnel, the rationale being that the public then have a different perception of who a veteran is and what it is they've done. However, **extending Armed Forces Day to incorporate and celebrate**

both serving and ex-Service personnel would enable greater visibility of current veterans. Whilst Remembrance Sunday has traditionally been when the nation observes the contribution of veterans, the tone of this commemoration is appropriately sombre and reflective, given its connection to personal sacrifice and loss, and in particular those who have died in combat. As such, whilst very much visible in the Cenotaph march past, veterans can often get lost in the media narrative, which generally focuses on specific campaigns and remembering the nation's war dead. The Legion suggests that it would therefore be appropriate to include veterans in Armed Forces Day, which is more celebratory in tone and generally attracts a younger audience, both in terms of those that attend events and those who participate in the occasion. Indeed, re-conceiving Armed Forces Day so that it more explicitly involves veterans would in some ways mark a return to the original concept for the day, which for its first three years was promoted as Veterans Day.

Improving understanding

There are also a number of ways in which understanding of the Armed Forces could be improved. Chief among these would be **an engagement campaign that seeks to better articulate the types of function and roles performed by military personnel, highlighting the number of Service personnel typically on deployment at any given time and the strategic context in which they operate**. Greater public awareness of the value of the UK Armed Forces outside of periods of conflict and the daily sacrifices made by Service personnel would improve understanding and recognition. An engagement campaign may also result in increased public sympathy towards the Covenant concept of special treatment in certain circumstances if they recognise that veterans who have not seen active duty or been injured in Service have still made sacrifices on behalf of the nation.

It is not just the public who could benefit from greater understanding of the Armed Forces. **Politicians at all levels of government, most of whom have no direct experience of military life, should routinely be offered the opportunity to participate in an Armed Forces and Veterans Placement Scheme**. Modelled on the success of the existing Armed Forces Parliamentary Scheme but achieving a greater scope and balance between operations and welfare, serving and ex-Service personnel, and the military and third sector, we envisage that participants could embed themselves with a local unit for a period, have exposure to the work of military charities in their area, and receive follow up news bulletins about the activities of, and any issues concerning, their local veteran community or unit. This could include invitations to attend award ceremonies, as covered above. Not only would such a scheme build links between politicians and their local serving and veteran population, but it might also lead to a greater understanding of Armed Forces issues that naturally comes from familiarisation with this community. As a result, it is hoped that Armed Forces related policy, whether national, devolved or local, could be more informed during its developmental stage and engaged with thereafter. In the same vein, **the Legion maintains that officers should be given the opportunity to undertake parliamentary or local authority orientation as part of their personal development plan**. This would again serve to establish links between the military and politicians, but also potentially encourage more veterans into public service.

The Legion suggests that it would additionally be worth **exploring the insertion of a module on the Armed Forces and Remembrance in the National Curriculum**, perhaps in connection with GCSE/AS/A-Level Citizenship lessons. It should be clearly communicated that this module is not intended to be a recruiting tool; rather, it would outline the role of the Armed Forces as an instrument of the state, provide an overview of its structure and functions, and explore the topic of Remembrance. Connected to this, **government funding for school trips to local and national military museums should be granted**, building on interest generated by the First World War centenary in understanding the contribution of local men and women to the security of the United Kingdom.

Addressing Need

Whilst the majority of measures suggested above concern the serving community, who will of course become part of the ex-Service community in time, there are meaningful measures that the Government could take to ensure that veterans, their families and widow(er)s could feel more recognised, all the while addressing areas of need and thereby improving the welfare of the ex-Service community. Many of these are outlined elsewhere in our consultation response, specific to the key theme or cross cutting factor.

One powerful demonstration of recognition which would help address need, would be for **Parliament and individual MPs to sign the Armed Forces Covenant**. The effect of this could be MPs and their offices receiving training on veteran's issues, asking and recording whether their constituent is a veteran when processing case work, and considering how to be a veteran-friendly employer. Knowing that their political representative has some understanding of their needs and is also eligible to enter the Defence Employer Recognition Scheme might go some way to ensuring that veterans feel valued by those in positions of power.

The Legion welcomes the focus of the consultation on recognition of the needs of those who have sacrificed the most, such as the injured and the bereaved. The Legion believes there are some relatively small measures that could make a significant difference to both the welfare of veterans and widow(er)s, and to the perception that society recognises their personal sacrifice. For those veterans who are injured and on higher compensation tariffs due to serious or complex medical conditions, the Legion would welcome **assessment of the feasibility of establishing a veteran group life insurance plan**, a form of which is available to US veterans. This would ensure that any veterans who may not be able to secure such cover from civilian suppliers, or who can but at costly premiums, would be able to enjoy the same peace of mind as the majority of civilians. Such a scheme would thus remove financial disadvantage arising from injuries or conditions sustained in Service. Exploration of such an insurance scheme should assess the possibility of extending the existing PAX life insurance scheme to veterans in receipt of military compensation, or alternatively offering a type of Service Risks Insurance Premium Refund (SRIP) to injured veterans incurring higher premiums on civilian schemes.

One positive example of a scheme that addresses need within the injured veteran community whilst also providing recognition through delivery of an enhanced service offering is the provision of free travel for veterans in receipt of a War Disablement Pension on public transport in Northern Ireland and Greater London. These schemes are in line with the second principle of the Covenant, which states that those who are injured may be eligible for special consideration. **We therefore recommend that this good practice is shared with private and state transport operators throughout England to encourage additional areas to implement similar concessions.**

For War Widows and Widowers, meanwhile, the **Legion maintains that an increase in the War Widows Funeral Payment to £4,800, which is currently the average cost of a funeral, could provide immediate recognition and financial relief to bereaved spouses**, whilst ongoing recognition of their sacrifice could be achieved through **the full exemption of War Widows' Pensions from statutory financial assessments for statutory support**. This would align the treatment of military bereavement compensation with that of military injury compensation when claiming benefits. Furthermore, **enhanced provision of education credits for bereaved spouses and children, to be used whenever they feel able to pursue new qualifications**, would demonstrate that the Government is committed to assisting bereaved families in rebuilding their lives, ensuring their sacrifice is never forgotten.

Remembrance

It would be remiss of the Legion not to mention the important role that acts of Remembrance have in demonstrating societal recognition and respect for those who have served in Her Majesty's Armed Forces. The Legion therefore recommends that **local Remembrance parades receive national funding in order to secure their future**, particularly at a time of restricted council budgets. Similarly, the Legion recognises the benefit of funded visits to Normandy for Second World War veterans who fought there and believes that **funded battlefield visit schemes should be established for veterans, and widow(er)s, of other more recent conflicts, such as the Falklands and Balkans.**

Finally, the Legion wishes to highlight the national importance of the Armed Forces Memorial as the UK's primary year-round focal point of remembrance. Through the National Memorial Arboretum, which welcomes over 320,000 visitors a year, the Legion maintains the Memorial as tribute to every member of the Armed Forces who has been killed on duty or as a result of terrorism since 1945. Despite the national significance and importance of the Memorial, which has new names added each year, its funding is insecure and has previously only been granted on a temporary basis. **We maintain therefore that, on behalf of the nation, the Government should commit to permanently funding the maintenance of the Armed Forces Memorial at the National Memorial Arboretum, ensuring that it has a secure future and that retains its position as the focal point of remembrance.**

Recommendations:

- Government and wider society endeavour to respect the wishes of those veterans who do not wish to be defined by, or singled out because of, their veteran status, ensuring that veterans are able to opt-into measures intended to raise their profile.
- The Single Services and the Armed Forces make more routine use of Open House Days.
- Military units do more to offer their services and/or spare capacity on bases to their local host council or community interest groups.
- Military units hold military ceremonies, such as the presentation of medals and awards, in a civic setting rather than on base.
- The Single Services and Ministry of Defence should facilitate the wearing of military uniforms on specific occasions throughout the year.
- Appropriate incumbent Service Chiefs are more routinely used for public relations exercises.
- Armed Forces Day is extended to incorporate and celebrate both serving and ex-Service personnel.
- The Government roll out an integrated engagement campaign that seeks to better articulate the types of function and roles performed by military personnel, highlighting the number of Service personnel typically on deployment at any given time and the strategic context in which they operate.
- Politicians at all levels of government are routinely offered the opportunity to participate in an Armed Forces and Veterans Placement Scheme.

- Officers in Service are given the opportunity to undertake parliamentary or local authority orientation as part of their personal development plan.
- The Department for Education explore the insertion of a module on the Armed Forces and remembrance in the National Curriculum.
- The Department for Education provide funding for school trips to local and national military museums.
- Parliament and all individual MPs sign up to the Armed Forces Covenant.
- The Ministry of Defence assess the feasibility of establishing a veteran group life insurance plan.
- The Ministry of Defence increase the War Widows Funeral Payment to £4,800.
- War Widows' Pensions are exempted from statutory financial assessments for statutory support.
- The Ministry of Defence provide enhanced provision of education credits for bereaved spouses and children, to be used whenever they feel able to pursue new qualifications.
- Existing good practice on free travel for those in receipt of an MOD administered compensation scheme is shared with private and state transport operators to encourage additional areas to implement similar concessions.
- Local Remembrance parades receive national funding in order to ensure their future.
- A fully funded battlefield visit scheme is established for veterans, and widow(er)s, of recent conflicts, such as the Falklands and Balkans.
- The Government commit to permanently funding the maintenance of the national Armed Forces Memorial at the National Memorial Arboretum.

10. Key theme 1: Community and Relationships

The Legion is pleased to note the weight placed by the Strategy on the topic of loneliness and social isolation. We especially welcome the recognition given within the strategy to the Legion's research in this area, which we believe to be the first of its kind carried out on the Armed Forces community on this topic. The Legion provides a number of services to address social isolation and loneliness within the Serving and ex-Service community, details of which can be found in appendix 3.

In 2018, the Legion published our report 'Loneliness and Social Isolation in the Armed Forces Community' to look at the impact of social isolation and loneliness on our beneficiary group and the unique triggers that affect them.⁴¹

While membership of the Armed Forces community provides many benefits, findings from our research⁴² suggest that some elements of Service lifestyle can increase vulnerability to loneliness and social isolation. These include:

- Increased volume of transitions in Service.
- A culture of self-reliance and avoidance of 'weakness'.
- Long periods of separation from partner and family.
- Impact of injury and/or sudden discharge on career and family.

As part of the research⁴³ undertaken for the report, we carried out an online survey disseminated to members of the Armed Forces community that was completed by 4,897 respondents. The survey found that:

- 1 in 4 survey respondents indicated that they feel lonely and socially isolated 'Always' or 'Often'
- Almost 70% agreed that loneliness and social isolation are issues in the Armed Forces community.
- Bereavement was the greatest cause of loneliness amongst respondents
- 70% of respondents agreed that it would be helpful to learn tips for conversation about loneliness and social isolation
- Moving to a new area was the most common cause of social isolation amongst survey respondents.
- 50% of respondents said exiting the Armed Forces had caused them to feel lonely and/or socially isolated in the past.

Veteran integration into communities

Every person's situation is different and there is no one size fits all solution to loneliness and social isolation within the Armed Forces community, as is the case with the wider population. Support needs to be tailored, and as an organisation we will work with others in some cases to provide the support required.

There is a lack of data about loneliness and social isolation within the Armed Forces community in the UK, particularly in relation to serving personnel and their families. This limits knowledge of the prevalence of the issue and the ability to identify trends and related factors. This also limits effective development and targeting of interventions around loneliness and social isolation. Annual measurement of these issues will provide some data to fill in these gaps. **Following the inclusion of a question on isolation being incorporated into AFCAS, we recommend the incorporation of questions or measures**

⁴¹ The Royal British Legion (2018), *Loneliness and Social Isolation in the Armed Forces Community*

⁴² Ibid p.18

⁴³ Ibid p.16

for loneliness and social isolation into the remaining Tri-service annual surveys: RESCAS (Reserves) and FAMCAS (Families) surveys.

Accurate data on the prevalence of social isolation and loneliness remains unknown within the demographics of the Armed Forces community. Several gaps in knowledge remain of the experiences of specific groups (e.g. Reservists), and the impact of new military policies on loneliness and social isolation (e.g. the Future Accommodation Model). **The Legion recommends the funding of a robust research programme focusing on the prevalence of loneliness and social isolation in the Armed Forces community. This programme should include specific strands on the experiences of minority groups including:**

- **Foreign and Commonwealth families;**
- **LGBTQ+ personnel;**
- **Carers within the Armed Forces community.**

The Legion also recommends that the MoD specifically fund research into causes of loneliness and isolation amongst serving personnel. Resources should also be allocated for longitudinal research to track Service leavers from exit to explore trends in loneliness and isolation over time.

The Legion further recommends that the Covenant Reference Group consider making loneliness and social isolation priorities for the Covenant Fund, to explore prevalence of the issues and support research into what interventions are most effective with the Armed Forces community.

The Future Accommodation Model (FAM) will significantly change the accommodation offer for serving personnel. A pilot of FAM was due to be launched in December 2018 and to run for three years across a number of locations in the UK. Findings from the Legion's social isolation report indicated that patch life provides a form of social support for many members of the Armed Forces community. Findings also highlighted that moving to a new area can cause loneliness and social isolation due to a lack of social connections, uncertainty of where to seek support, and a perceived lack of understanding from the civilian community. In light of this, **the MoD should monitor loneliness and isolation as part of the pilot of FAM, to establish whether the policy has an impact on these issues.**

The terms loneliness and social isolation are often used interchangeably; however, it is important to recognise that they are distinct concepts. While the Legion welcomes plans to tackle loneliness and social isolation across the UK, **we recommend that local and devolved governments adopt common definitions in order to align measurement criteria, to ensure data is comparable and that it can be used to track progress across regions. It is also crucial that devolved governments are mindful of the specific needs of the Armed Forces community, and that these needs are addressed clearly in terms of resource and delivery.**

We recommend that all local authorities include loneliness and social isolation in their Joint Strategic Needs Assessment (JSNA), or equivalent, and that they consider how additional initiatives could be targeted at members of the Armed Forces community.

Research suggests that members of the Armed Forces community may be at increased risk of loneliness and social isolation. It is therefore important that all local authorities commit to defining and understanding the issues of loneliness and social isolation in their area. Within this, we also call on local authorities to link in with existing assessments carried out in relation to the needs of the Armed Forces community at a local level. This could enable local authorities to recognise and respond to the issues of loneliness and isolation locally, as well

as to explore the provision of additional initiatives or tailored interventions to members of the Armed Forces community, as required.

Education of the Armed Forces of the danger, impact and prevention of loneliness and social isolation is critical to combat this newly identified condition. **A module on social resilience for all serving personnel should be a mandatory part of resettlement provision.** The module should include: education around the triggers of loneliness and social isolation in the Forces; how to spot signs and have conversations about them; and signposting for professional support. **Briefings or packs on loneliness and social isolation should also be provided to family members to help them prepare for periods of separation, moves to new areas, and final transition out of the Forces.**

The HARDFACTS Monitoring and Assessment Tools are periodically used to monitor personnel progress and assess Service leavers before they are discharged, to identify any issues that might require resolution as they are discharged and establish themselves in civilian life. The tools cover a range of areas including health, accommodation and family. **The Legion recommends that questions relating to loneliness and social isolation are incorporated into these tools, to monitor and support personnel who may be experiencing these issues, and to assess whether Service leavers need additional support around these before and after discharge.**

The Legions research indicates that the pressures of Service life can lead to relationship issues and breakdown, a key risk factor for loneliness and social isolation. Findings also suggested that some members of the Armed Forces community lack trust in in-Service welfare and are reluctant to ask for support over fears about confidentiality and barriers to promotion. **The Legion recommends that the MoD fund free or subsidised relationship support, to be provided by independent organisations.** This should include investment in counselling and preventative relationship education through a blended approach, to ensure personnel or families living overseas are able to access it.

As outlined in the report 'Promising approaches to reducing loneliness and isolation in later life'⁴⁴ produced by Age UK and the Campaign to End Loneliness, there are a number of interventions which can be taken which aim to improve feelings of loneliness and social isolation. These can be foundation services which are able to reach lonely or isolated individuals, understand and respond to their specific circumstances, and are able to support them to take part in a service appropriate to them or gateway services, which help communities come together, such as transport or technology. There are also direct interventions which can focus on improving peoples existing relationships, on making new connections, and on changing a person's thinking.

Focus group participants indicated that there are many successful initiatives falling into all these categories taking place. However, despite these initiatives, the Legion believes that the demand for existing services to deal with the levels of loneliness and social isolation within the veteran community are failing to meet a growing demand, despite the presence of underused public and private sector facilities potentially available. It was suggested in focus groups that, "the ex-service community, especially those that need help, could benefit from having the gyms on base or other facilities open to them to use. At the moment it is down to individual commanders whether you're allowed in."

Anecdotal evidence further suggests that a lack of suitable befriending services is a common issue currently faced by frontline staff and those they are trying to support. Legion caseworkers in some areas of the UK report that there is a reliance on services provided by

⁴⁴ Age UK and Campaign to End Loneliness (2015), *Promising approaches to reducing loneliness and isolation in later life*

Age UK, and if they do not operate in that area, or the beneficiary lives in a rural area, there is little available to which they can be referred.

The Royal British Legion is therefore pleased to see the Government's recent commitment in the Loneliness Strategy⁴⁵ to expanding services over the next five years, and particularly embedding social prescribing. The Government strategy, working with local authorities, health bodies, businesses, the voluntary sector and local communities, states that they will introduce a range of new initiatives that enable the everyday services we use to connect those at risk of loneliness to support. The Royal British Legion welcomes this increased Government focus and the opportunity to work collaboratively to provide support in this area.

The Loneliness Strategy goes on to outline a number of specific measures being undertaken by different Government departments, and Government agencies, including the Department for Health and Social Care, the Department for Transport, the Home Office, the Department for Work and Pensions, Public Health England, Department for Culture Media and Sport, the MHCLG, the Department for Business, Energy and Industrial Strategy, and the Department for Education. The Legion maintains that the **Ministry of Defence and the Single Services should be key partners in the cross governmental strategy and represented in its campaign to explore how best to drive awareness of the importance of social wellbeing and encourage action through easy-to-understand messages and information.**

Recommendations

- The incorporation of questions or measures for loneliness and social isolation into the remaining Tri-service annual surveys.
- The Government funds a robust research programme examining the prevalence and causes of loneliness and social isolation across the Armed Force Community.
- The Ministry of Defence monitor impact on loneliness and social isolation in the pilot of the Future Accommodation Model.
- Local and devolved governments adopt common definitions of loneliness and social isolation.
- Local authorities include loneliness and social isolation in their Joint Strategic Needs Assessment (JSNA) or equivalent, and that they consider how additional initiatives could be targeted at members of the Armed Forces community.
- The introduction of a module on social resilience for all serving personnel as part of resettlement provision, with a focus on loneliness and social isolation and preparation for transition out of the Forces.
- The Single Services incorporate specific questions about loneliness and social into the HARDFACTS Assessment and Monitoring Tools.
- The introduction of centrally funded relationship support for couples experiencing issues related to service both within Service and following transition.
- The Ministry of Defence and the Single Services are represented in Cross Government loneliness strategy campaigns.

⁴⁵ Department for Culture Media and Sport (2018), *A connected society: a strategy for tackling loneliness*

11. Key theme 2: Employment and Education

Background

In 2017-18 approximately 14,760 people left the UK Regular Armed Forces⁴⁶, 80% of these service leavers will have found paid employment, making the picture of veterans' employment a positive one.⁴⁷ It should be noted however, that employment outcomes are only tracked for Service leavers up to two years out of Service, restricting analysis of the long-term sustainability of the initial employment secured. **We recommend that the long-term sustainability of employment for veterans, post-2 years from discharge, is researched.**

Introducing a comprehensive transition process well in advance of leaving service and the Careers Transition Partnership (CTP) mean that Service personnel today are better prepared for work than their counter parts in previous generations. There is also substantial employment support within the charity sector for veterans when leaving Service including the Legion's Civvy Street scheme which provides funding for employment training courses and grants for tools and equipment required for work.

Despite this support and the context that veterans of the Armed Forces are likely to be leaving Service with highly developed skills, the Annual Population Survey of veterans in Great Britain shows that veterans are no more able to secure employment than the general population.⁴⁸ Veterans develop invaluable, lasting and transferrable skills during their Service such as leadership and team work. Yet finding employment can be challenging, and many who leave Service do so with little or no experience of civilian employment. Consequently, Service leavers may exhibit limited understanding of translating transferable skills to a civilian job seeking process or prepare for a job interview. Service leavers also risk facing pernicious stereotypes from employers with preconceived notions about veterans and their abilities.

Furthermore, having secured employment, the Legion is aware that veterans may face further barriers in sustaining employment. Factors such as the changing nature of the job market, expectations of roles and mental and physical health issues, may individually or cumulatively impact on working age veterans. Legion staff members who took part in our focus groups mentioned beneficiaries who change jobs up to four times a year.

As discussed earlier in our response, the veteran community is not homogenous, and therefore different cohorts may face different challenges when sustaining employment; Barriers may be particularly apparent amongst Wounded Injured and Sick (WIS) leavers and Early Service Leavers.

Employers Perceptions and Stereotypes

Employers perceptions of veterans in the work place can be both a perceived and real barrier faced by veterans when trying to find employment. One beneficiary of the Poppy Factory noted in their 2016 report into employability, "stereotypes of being, you know, the Vietnam Vet in the corner. Can't do anything because every time I'm angry, I might explode

⁴⁶ Ministry of Defence (2018), *Quarterly Stats UK Armed Forces Quarterly Service Personnel Statistics October*, HM Government. p.1

⁴⁷ Deloitte (2018), *Veterans Work: Moving On* p.8.

⁴⁸ Ministry of Defence (2018), *Annual Population Survey: UK Armed Forces Veterans residing in Great Britain 2017*

and grab a gun and shoot people.”⁴⁹ As outlined in the Cross Cutting factor five, recognition of veterans, the Legion seeks to address this ‘Mad, bad and sad stereotype’, acknowledging and countering any misguided public perceptions that overstated numbers of veterans suffer from high levels of mental health problems, are in custody, sleep rough or are suicidal. The Legion’s Household Survey reflected that, “these myths are pernicious because they may harm the employment prospects of military personnel when they seek work in the civilian world”⁵⁰. It is not unreasonable to assume that this stereotyping can persist once a veteran has started employment, especially in organisations where there is little understanding of military culture and fellow employees may be curious about their new colleague. For some veterans, this may create an uncomfortable environment which may prevent them staying in employment long term.

Corporate signatories to the Armed Forces Covenant present a viable route to addressing this barrier in part, and progress has been made with the Employer Recognition Scheme. Yet, further practical support for businesses who may not be award holders or fully understand their commitments would be welcome. The Legion therefore recommends that **the Government should undertake a review of the educational support offered to corporate signatories of the covenant and the ability for employers already signed up to the Covenant to share positive experiences of employing veterans with those who have not signed up to it.**

Reasonable Adjustments and Flexibility

A proportion of veterans will leave Service with health conditions whilst still of working age and therefore want to take up employment in civilian life. Both the Legion’s Household Survey and the Ministry of Defence’s Annual Population Survey show that there are certain conditions more prevalent within the working age veteran population than the general population.^{51,52} As with their disabled civilian peers, to manage these conditions these veterans require flexibility in their working patterns and reasonable adaptations to allow them to sustain their employment. However, veterans may not know what support is available to improve their experience at work. Government schemes such as Access to Work provide funds that can assist with specialist equipment and support in the work place in order to keep people in employment. **The Legion would like to see the Access to Work scheme more widely promoted within Service and to transitioning veterans, especially to those who are approaching medical discharge. It is also vital that this support is better advertised to veterans have left Service and receive support from Jobcentre Plus.**

As well as a lack of knowledge of existing support, veterans may hold on to a mentality acquired in Service of not complaining and ‘getting on with it’. They may not feel that they should ask for help in the form of adaptations or changes to their working conditions, risking exacerbating health issues and, in turn, making it difficult to continue in the work place.

Mental Health

For some veterans their mental health has meant that they are unable to stay in employment. The nature of an fluctuating mental health conditions which can present intermittently, but intensely, means that some veterans may take up employment, but

⁴⁹ S Carolan (2016), *Employment in mind, The Poppy Factory employability service and veterans with mental health conditions*, p.12

⁵⁰ The Royal British Legion (2014), *Household Survey* p.v

⁵¹ Ibid p.18

⁵² Ministry of Defence (2018), *Annual Population Survey 2017*

struggle to sustain it. As one veteran, recorded in Salford University's study into the impact of welfare conditionality on veterans, describes his attempts to stay in work:

"I've been in and out of jobs throughout the last ten-odd years or so, and that, apparently, is quite common with my condition of, you know, starting a job, cracking on with it and then two to three months later, bang... It's part of the whole PTSD because things become overwhelming... You sort of try to remove yourself away from it because it's quite embarrassing and I'm quite ashamed and think what other people are thinking about me, and I found it very difficult and become more anxious about it, about returning to work, because of negative impressions that co-employees or employers would have about me. (UC claimant)"⁵³

For others within this small but significant minority of the veteran population, drug and alcohol dependency issues can make staying in employment difficult. Whilst Service may not be definitively pinpointed as a causal factor for substance misuse issues within a veteran, a disorderly, chaotic transition to civilian life may exacerbate any problem. In Salford University's study *Sanctions, Support and Service Leavers*, a veteran who was administratively discharged from Service for drug use exemplifies how estrangement from a child combined with bereavement meant that he turned to drugs to cope and was discharged. His drug and alcohol use continued in civilian life and meant that staying in employment was next to impossible.⁵⁴ Whilst this case study may be atypical as many veterans successfully stay in employment, poor mental health and substance abuse are factors that should be considered when trying to explain unemployment and underemployment amongst veterans.

When looking for employment the Department for Work and Pensions via the Jobcentre Plus network is the primary statutory service provider. With the introduction of Universal Credit, the Department's previous Green paper into work and health indicated that employment support from work coaches within Jobcentre Pluses will be more personalised to the needs of the client.⁵⁵ The Legion welcomed this ambition, however for these work coaches to be effective for the veteran population they need to have knowledge of the unique and exacerbated conditions that may affect some veterans' fitness to undertake paid employment. It is equally vital that the aforementioned understanding is ingrained in national policy through **conditionality policies being amended to provide flexibility for where benefit and support conditionality is not met due to circumstances attributable to veteran experience**. This is in line with the second principle of the Covenant that special treatment can be appropriate for those who are injured.

Skills and underemployment

The consultation document acknowledges that the current labour market can be a challenging environment with changes in employment practices. Additional factors such as geographical concentrations of certain employment sectors should also be noted. Factors such as the above are likely to impact on Service leavers of lower ranks, those who leave early or with little or no qualifications. At present there are no minimum educational standards for joining the army and as this is biggest branch of the Armed Forces, it is the group most likely to produce veterans who struggle to find suitable civilian employment.

⁵³ P Dwyer, C Hynes, K Jones, P Martin and, L Scullion (2018), *Sanctions, Support & Service Leavers: Social Security benefits, welfare conditionality and transitions from military to civilian life First-wave findings*. p.15

⁵⁴ Ibid p.16

⁵⁵ Department for Work and Pensions (2016), *Improving Lives, The Work, Health and Disability Green Paper*, p.25

Issues of wage levels and job security specifically for veterans are affected by wider economic factors beyond the scope of this consultation. However, there are things that can be done that can lessen veterans' vulnerability to these issues. **The Legion believes that Armed Forces recruits below the age of 18 should be subject to the same statutory minimum educational standards as they would do in the civilian education sector. This should include: A minimum of 280 guided learning hours per year towards accredited qualifications of an appropriate level, Support to take or retake GCSE's in English and Maths to achieve passes at grade equivalency of A*-C and for those who already hold qualifications, support to Level 3 qualifications with transferable value to future civilian employment.**

A study conducted in 2018 by Deloitte on veteran work and relocation found that the majority (51%) of veterans choose not to consider moving for a job opportunity and only 23% cited 'work' as the reason they chose to move to their current location. Respondents were more likely to cite their children's education and family ties as reasons for their current location.⁵⁶ For less skilled former Service personnel or those struggling to retrain, employment options can be limited by geography and this may mean that their skills are underutilised. The Legion's Household Survey found that younger veterans are less likely to say they are able to use their acquired skills at least quite a lot: four in ten of those aged 16-34, compared with seven in ten of those aged 35-64. While three in four working veterans with a degree can no longer use their acquired skills at least quite a lot, this falls to six in ten of those with no qualifications. While British adults aged 20-29 are less likely to say they can use their skills at least quite a lot (six in ten) than older people, the difference is more marked for veterans: veterans aged 16-34 seem to have a greater problem with using their existing skills in their current job than is the case across Britain.⁵⁷

As previously highlighted, many veterans will seek support from the Department for Work and Pensions in trying to find employment, whether through claiming Job Seekers Allowance or Universal Credit. For many there will be strict conditionality placed on their benefit claim and it is likely to entail looking for work or finding employment for a certain number of hours. As outlined above, veterans already report underemployment and may struggle to transfer their qualifications and skills into the civilian workplace, so inappropriate and unsustainable employment risks exacerbating those factors. The Legion would again welcome **the introduction of greater flexibility in the Department's conditionality approach with an emphasis on taking 'any job' that gives no consideration to veterans' previous work experience, preferences or skill set and results in financial penalty when not complied with.**

"They [Jobcentre Plus] just said I couldn't choose, I couldn't turn down jobs, so I'd have to go with anything that was offered, if I did turn down jobs I'd get sanctions... it's not as easy as that. I've got to do certain types [of work], security jobs are perfect for me because it suits my skill set from the Army... But you put me in a factory and I'm no good... [I'm] going to end up back on the dole in three months' time, if not earlier. (UC claimant)" ⁵⁸

As the above example illustrates, taking any job provides an income and meets benefit conditionality, yet does not mean that a veteran will stay in employment and have a fulfilling career. Again, when dealing with veterans, **the Department for Work and Pensions should allow 'veteran friendly' work coaches to show discretion when imposing conditionality and work with the veteran to establish their interests and skill level so that they are able to find sustainable, fulfilling employment.**

⁵⁶ Deloitte (2016), *Veterans Work: Recognising the potential of ex-service personnel*. p. 8

⁵⁷ The Royal British Legion (2014), *Household Survey*. p.68

⁵⁸ Dwyer et al (2018), *Sanctions, Support & Service Leavers*. p.56

Spousal Employment

Any support for veterans in the UK must incorporate a holistic approach to improving outcomes, including support for families. Spouses form a substantial part of the Armed Forces community, and in many cases have made a large number of sacrifices, such as pursuing their own career or stability as they move frequently following their partner on postings. However, research has found that veterans with spouses who are employed when they leave Service, tend to fare better once they do so.⁵⁹

Challenges faced by spouses include a lack of jobs in remote locations where they may be stationed, dealing with un- or underemployment, lower pay, and fewer opportunities to pursue a career. According to the MOD's Families Survey (FAMCAS) this is listed as one of the reasons why Service personnel consider leaving the military.⁶⁰ The Legion is aware that the MOD have begun to address the issue by running, and carrying out evaluation on, a Spousal Employment Support Trial since 2015 and has welcomed this progress.

The Legion agrees with the recommendations of the evaluation of the trial, specifically that **the Ministry of Defence should recognise military spouses as individual agents in their own right and provide support and assistance to help military spouses into employment.** By recognising the spouse as an individual and not an extension of the Service person, there is a likelihood that once their serving partner has left Service the spouse will find the transition into civilian life smoother. They will more easily be able to access the civilian employment market, as they will have built up skills, experience and qualifications of their own, and therefore provide greater stability and support for the veteran.

Education of children and young people

In addition to spousal employment, a holistic family-based approach to veteran care must acknowledge, and provide support for, children of ex-Service households. The Legion has previously estimated that in 2014 there were likely to be 785,000 children aged between 0 to 15 attached to households within the ex-Service community.⁶¹ Within this cohort are children who will have transitioned out of Service life with their veteran parent. Successful and smooth transition of these children out of Service life and mitigation for the stresses that Service and veteran family life may have placed on them, is essential to veteran wellbeing.

Although there is more that can be done for children of current Service personnel, there are certain provisions already in place, such as enhanced pastoral support through the allocation of Service Pupil Premium (SPP) to schools. Due to the mobile nature of the Armed Forces community, meaning transfers between school may happen with increased frequency compared to their civilian peers and may happen mid-academic year, Service children also benefit from provisions to address disadvantage in the school admissions code.

The positive impact of projects funded by the SPP is well documented, not least by the Legion in our best practice guide *Supporting Service Children in School in England*. We are pleased to note that the SPP can be utilised by schools to provide support to pupils who have previously registered as Service children even where the parents may have left Service. However, the Legion maintains that SPP's restriction to providing support for children aged up to the age of 16 cuts off this support before mandatory education is complete. This cut off leaves children of Serving personnel and veterans still accessing

⁵⁹ Forces in Mind Trust (2018), *Lifting the Lid on Transition the Families' Experience and the Support they Need*, p.28

⁶⁰ Ministry of Defence, *Families Continuous Attitude Survey*

⁶¹ The Royal British Legion (2014), *Household Survey*. p.75

education but without support they may still benefit from to ensure that they are not restricted in their achievement. Research by the University of Winchester revealed an underrepresentation in higher education of the children of Service families, finding that, “it is in the realm of up to 4 out of 10 children who, if in the general population would go to university, do not go if they are from a military family”.⁶² **The Legion therefore recommends that the Service Pupil Premium is extended to pupils in early years education and up to the age of 18.**

The current school admissions code for England currently states that, “For families of Service personnel with a confirmed posting to their area, or crown servants returning from overseas to live in that area, admission authorities must: a) allocate a place in advance of the family arriving in the area provided the application is accompanied by an official letter that declares a relocation date and a Unit postal address or quartering area address... Admission authorities must not refuse a service child a place because the family does not currently live in the area, or reserve blocks of places for these children; b) ensure that arrangements in their area support the Government’s commitment to removing disadvantage for service children.”⁶³

The code therefore provides guidance to ensure that the children of Service personnel are not disadvantaged when moving into an area. However, for those leaving Service accommodation as their parent transitions out of Service similar issues apply, especially for those who may be discharged at short notice due to medical or administrative reasons.⁶⁴ The principle of statutory agencies making provision for recently transitioned veterans entering an area already exists in housing allocation policy guidance. Guidance for local housing allocation policies states that veterans should not be subject to local connection rules for five years following discharge as they move and settle in new areas. **The Legion believes that school allocation policies for children of the armed forces should similarly be extended to encompass recent veterans, potentially working to the same model of five-years post service.**

Recommendations

- The long-term sustainability of employment for veterans, post-2 years from discharge, is researched.
- The Government undertake a review of the educational support offered to corporate signatories of the covenant and the ability for employers already signed up to the Covenant to share positive experiences of employing veterans with those who have not signed up to it.
- The Ministry of Defence and Department for Work and Pensions work together to ensure the Access to Work scheme is more widely promoted to Wounded Injured and Sick Veterans, those who are about to be medically discharged and considering civilian employment and veterans accessing statutory support.
- The Department of Work and Pension ensure that conditionality policies are amended to provide flexibility for where conditionality may not be met due to circumstances attributable to veteran experience.

⁶² J McCullough and M Hall (2016). *Further and higher progression for service children: research paper*

⁶³ Department for Education (2014), *School Admissions Code* p.25

⁶⁴ McCullough and Hall (2016)

- Armed Forces recruits below the age of 18 should be subject to the same statutory minimum educational standards as they would do in the civilian education sector. This should include: A minimum of 280 guided learning hours per year towards accredited qualifications of an appropriate level, Support to take or retake GCSE's in English and Maths to achieve passes at grade equivalency of A*-C and for those who already hold qualifications, support to Level 3 qualifications with transferable value to future civilian employment.
- The Department for Work and Pensions ensure 'veteran friendly' work coaches are available to veterans. These coaches are sufficiently trained to establish a veteran's interests and skill level so that they are able to find sustainable, fulfilling employment.
- The Ministry of Defence should recognise military spouses as individual agents in their own right and provide support and assistance to help military spouses into employment.
- The Department for Education extend Service Pupil Premium to pupils up to cover Service children in early years education and up the age of 18.
- The Department for Education amend school allocation policy guidance to extend Armed Forces provision to encompass recently transitioned personnel.

12. Key theme 3: Finance and Debt

The Royal British Legion's *A UK Household Survey of the ex-Service Community 2014* found that the likelihood of going into arrears is particularly concentrated within the Armed Forces community amongst those aged between 16-34 years old, where it was likely to effect around 70,000 members of the community. The research further found that arrears are more likely to be reported in households with dependent children, particularly larger households of four or more and for those who are divorced or separated.⁶⁵

The Legion's Benefits, Money and Debt Advice (BDMA) teams provide free, confidential financial advice for beneficiaries, as well as assistance in lodging appeals against benefit decisions and comprehensive advice for those in unmanageable debt. The BDMA service is available to all Legion beneficiaries in England, Wales, and Northern Ireland, and is based on a financial assessment. This service therefore gives some indication of the scale of financial need and in 2016/17, the BDMA team ensured £3,818.375 of debt was written off and benefits gained for Legion beneficiaries.

For those who struggle with finance and debt within the veteran community, there are limited touch points for support, and many issues may be a result of behaviours influenced by Service life. The Legion regularly deals with veterans once they have reached crisis point after years of accumulated poor financial management, much of which could have been avoided. We therefore believe that ensuring personnel leave Service financially literate and capable is key to reducing debt and improving financial capability within the veteran community.

Debt and Budgeting

In the Legion's experience, one of the biggest issues faced by veterans and serving personnel is debt. According to Payplan, a debt management company, the average debt held by former military personnel entering an Individual Voluntary Arrangement stands at £51,435, compared to an overall average amongst the general population of £43,234⁶⁶. Overall, the UK population struggles with financial resilience and forward planning and this is not a phenomenon unique to the Armed Forces; however, the characteristics and pressures of Service life may exacerbate these issues and make them more prevalent within the Armed Forces community.

Whilst still in Service, personnel are often sheltered from the real world cost of living that civilians face as essential costs such as food and accommodation can be taken at source. Research carried out by Parry Associates note that 'the average age range on Army bases is between 18 – 40 years', and this would indicate that most Service families transition back into civilian life at a relatively early working age.⁶⁷ Faced with an increased cost of living upon exiting the Armed Forces, and a potential reduction in wages as comparable civilian roles can pay less, this group is at risk of falling into debt as they adjust to life outside the military. For instance, the Legion has supported recent Service leavers who have fallen into severe debt over unpaid Council Tax and other utility arrears because they believed these bills were included in their rent.

⁶⁵ The Royal British Legion (2014), *Household Survey*. p.56

⁶⁶ The Express newspaper, (2017) Britain's Shame: Ex-soldiers facing dangerous levels of debt warn experts <https://www.express.co.uk/finance/personalfinance/820839/armed-forces-day-soldiers-debt-money-help-finances-news>

⁶⁷ Brian Parry Associates and Forces in Mind Trust (2015), *Better Understanding the Support Needs of Service Leaver Families*. p.8

Educating serving personnel about the actual cost of living and expenses they will face upon leaving Service can be a useful way of reducing the prevalence of debt in the veteran community, potentially through the further inclusion of life skills to resettlement packages. Anecdotal evidence from Legion beneficiaries regularly highlights that resettlement does not sufficiently teach practical life skills, such as money management, instead focusing on how to find employment. Although this is an essential component of resettlement packages, it does not alone provide Service leavers with a realistic understanding of the civilian world. As one focus group participant put it, “resettlement doesn’t teach you to be a civilian.” Other focus group participants had similar sentiments:

“I think a Service person is paid pretty well. So, when that stops, whether it’s because they’re discharged for injury or something like that, then that lifestyle that they’ve become used to also stops. They often want to continue that lifestyle but after they leave the Services, they don’t have a job that allows them to maintain that lifestyle... I don’t know what the average wage is in Plymouth, but I can probably guess that’s it’s not what I [as Service member] am on now.” (focus group participant)

“I think the problem when I was serving, was that the married guys generally don’t have much experience with running a household. When I was serving, my wife was generally left to do the budgeting etc and when I left the Service I was like ‘oh right, how do I do online banking? Where do I get a dentist?’ It was issues like that... but for single boys and girls, who haven’t got someone to run that household, who are leaving with a good wage, who then have to adapt to paying for stuff they’ve never paid before; then when you look at the sort of issues that tend to surface with the lads gambling on their phones, because that tends to impact the sort of age group we tend to recruit, who’ve done say 5 years? - that’s where the danger zone is. Finance and debt, especially with single individuals.” (focus group participant)

“But you get a lot of people with their heads in the sand because they like their current lifestyle... they live in a 3 or 4 bedroom house that’s subsidised heavily. When they leave the Service, that subsidy goes away and issues about higher rent, utility bills and size of accommodation become a problem because they previously haven’t had to deal with such things... its why many current Service members aren’t saving for that civilian life – because there’s no incentive for them to do so.” (focus group participant)

Furthermore, poor financial and budgeting habits within Service exacerbate financial strain during and after transition. Whilst in Service, personnel sometimes can find themselves with higher levels of disposable income than they may have previously experienced. When combined with subsidised accommodation costs, personnel can find themselves in a culture of high spending rather than saving. The nature of the Armed Forces means that transition can be sudden and unprepared, therefore poor financial habits need to be addressed much earlier than just at the point of transition in the Service person’s career. It was suggested in one focus group that career progression training within the Services could include further financial capability training.

The Legion therefore recommends **educating serving personnel, and their families, through the inclusion of life skills training in resettlement packages, and an increased prominence of financial capability training throughout Service.**

Access to Credit

Easy access to credit and unfamiliarity with the terms of a credit agreement is one of the biggest types of arears faced by the Legion’s BDMA teams. In the Legion’s experience, the purchase of large ticket items, such as cars on financing agreements, has led to severe

financial problems among those in Service. We acknowledge that financing agreements are a cause of debt within the wider general population, however that does not diminish from the need to seize the opportunity presented by Service structures to address this for the serving community. The Legion and MOD's joint project, MoneyForce, provides guidance on the best available options for financing big items such as cars. However, despite departmental endorsement, we are concerned that use of MoneyForce is reliant on charitable advertising and word-of-mouth. The Legion therefore recommends that **MoneyForce is promoted more widely amongst the serving Armed Forces and their families, especially those starting out in their post-Service careers.**

Whilst there appears to be a problem with some Serving personnel accessing unsuitable credit arrangements, others are being pushed into unsafe credit options due to difficulties with obtaining a credit rating. Despite improvements in recent years, the Legion remains aware of Service families experiencing credit rating issues when posted overseas for significant periods. Barriers to access to mainstream credit may lead personnel and veterans to use pay day loans and other forms of easily available but expensive credit, which they are often unable to pay back. There is anecdotal evidence that Service families are specifically targeted by pay day loan companies, and such families are in danger of being tempted to take on unmanageable debt, and ultimately carry this debt into civilian life.⁶⁸ The Legion's Household Survey has shown that around 200,000 veterans and their dependents aged between 16-34 used payday loans in the previous year.⁶⁹

To address this issue and ensure that fewer veterans develop debt issues in Service, **more effective communication is needed to warn Service families of the dangers of taking out pay day and other unregulated loans, and to highlight the availability of alternative sources of finance such as an Armed Forces Credit Union.**

Gambling

Gambling has historically always been a popular form of entertainment in the Armed Forces but in recent years the opportunities to gamble have increased significantly with access to gambling being made much easier through technology. The Legion is aware that there is a growing body of evidence to suggest that gambling may now be an emerging area of significant concern within serving personnel and veterans. The Legion has received multiple anecdotal accounts from Service personnel, both officers and other ranks, of an increase in online gambling on bases, with potential consequences including: increased levels of debt, reduced social cohesion, and even a disruptive impact on operational effectiveness.

There is currently a lack of research on problem gambling within the UK serving population, although the characteristics of those most at risk of problem gambling within the general population correlates with the profile of the serving population, which is predominantly young, male risk-takers.⁷⁰ As with the serving population, there is no definitive study of gambling rates amongst the veteran community, although preliminary work undertaken by the University of Swansea found that veterans may be up to 8 times more likely than non-veterans to be at risk of problem gambling.⁷¹ Additionally, problem gambling has been associated with conditions more prevalent in the serving and veteran population than amongst the UK general population, such as common mental health problems and

⁶⁸ Brian Parry Associates (2015)

⁶⁹ The Royal British Legion, (2014), *Household Survey*. p.xii

⁷⁰ Miller, C, Krasodonski-Jones A and Smith J (2016) *Gambling and Social Media*. p.5

⁷¹ Roberts, E, Dighton, G, Fossey, M, Hogan, L, Kitchener, N, Rogers, R, and Dymond, S (2017) *Gambling Problems in UK Armed Forces Veterans: Preliminary Findings*. p.7

substance abuse⁷². Lastly, it has been found that veterans who suffer from Post-Traumatic Stress Disorder may be at heightened risk of developing a gambling problem. As there is a prevalence of debt within the ex-Service community, the above factors mean it is not unreasonable to assume gambling may be a causal factor.

The Legion believes that the issue of problem gambling needs to be addressed in Service as it can lead to poor outcomes when serving personnel become veterans, especially when they leave the protections of military life, which includes subsidised rent and often no commuting costs. We would like **to see the MOD undertake, and/or support through access, more research around problem gambling to determine the nature and prevalence of the problem within Service and implement a strategy to tackle gambling in Service.**

Employment Support Allowance and Pension Credit

Members of the UK Armed Forces who are injured as a result of their Service are entitled to payments from one of two compensation schemes, dependent on the date of their injury. For those injured after 6 April 2005, the Armed Forces Compensation Scheme provides a lump sum payment and a Guaranteed Income Payment stream for the most seriously injured. For those injured before 6 April 2005, the War Disablement Pension Scheme provides a lifetime award paid in ongoing weekly or monthly instalments.

For the vast majority of statutory benefits that utilise an income means test, such as social care, housing benefit and council tax support, both compensation payments are not routinely treated as normal income and are therefore disregarded. However, for income related Employment Support Allowance (ESA), the means test only disregards the first £10 of military compensation, leaving the rest to be sacrificed for much needed employment support payments. Capital from compensation for personal injury in the civilian workplace can be disregarded fully if placed into a trust, something a War Disablement Pension cannot be due to the nature of its administration.

The Legion strongly welcomes that this disparity is set to be removed through the introduction of Universal Credit, where military compensation payments are disregarded across the board, thereby bringing the means test for income related ESA into line with civilian compensation. Yet the timetable for the full roll out of Universal Credit continues to be delayed and extended, leaving injured veterans foreseeing further years of having to unfairly sacrifice their compensation. **The Legion therefore recommends that interim arrangements are put in place to routinely disregard War Disablement Pension and Armed Forces Compensation Scheme payments from the income related ESA means test, until the full roll out of Universal Credit is completed.**

When the full roll out of Universal Credit is achieved, it will however create a disparity between working age veterans and those over 65 with limited means. As outlined above, Universal Credit should ensure that compensation payments are not taken into account in the financial means testing process. However, the same is not true for those over the eligible age criteria and therefore on Pension Credit. Not only will this disadvantage older veterans compared to their working age contemporaries, it also risks creating a cliff edge scenario for those moving from Universal Credit to Pension Credit. **We therefore recommend that the Department for Work and Pensions disregard compensation payments from the Pension Credit means test to ensure equitable treatment between generations.**

Foreign and Commonwealth Personnel

⁷² Daghestani, A. N., Elenz, E., & Crayton, J. W. (1996). *Pathological gambling in hospitalized substance abusing veterans. Journal of Clinical Psychiatry*, 57, pp 360 – 363

Despite undertaking the same risks and sacrifices as their UK national counterparts, with the additional sacrifice of relocating away from their families and networks, foreign and Commonwealth personnel are particularly at risk of falling into debt when they transition into civilian life and become veterans. When leaving Service, they often have the extra financial challenge of paying for the cost of an Indefinite Leave to Remain application if they wish to stay in the UK after Service. The cost of such an application is presently £2,389 for the veteran and for each dependent application. A veteran with a spouse and two children wishing to stay in the UK can therefore face a bill of £9,556 to be allowed to stay in the country. In the last five years this cost has risen by 119%, although it has risen a total of 1,441% since being introduced in 2003 at a cost of £155 per person. It is further worth noting that, should any error be made in the application process, the fee is non-refundable and a further application will require the fee to be paid again.

In 2017, the Army employed approximately 7.1% (5,820) of its personnel from foreign and Commonwealth nations. Of these, the majority were generally concentrated in the lower ranks. Although the Army has been the main recipient of Commonwealth recruits, the Royal Navy and Royal Air Force also recruit from Commonwealth countries in lower numbers. The Royal Navy, for example, employs 580 foreign and Commonwealth personnel (as at 1 October 2018), almost all of whom are ratings.⁷³ Greater provision of immigration information and encouragement to save throughout their time in Service are welcome recent developments, however this is not a panacea; if Commonwealth personnel have dependents in their country of origin, they frequently have to cover the cost of bringing them to the UK, which costs roughly £1,500 per person as of April 2018, with this cost likely to increase. Savings may also be impeded as cultural obligations may require them to support families back home and cover living costs when a family does settle in the UK. The Legion therefore **maintains that Indefinite Leave to Remain fees for Commonwealth Armed Forces personnel and their dependents should be waived with immediate effect.**

Personal Independence Payment

Veterans who are accessing Personal Independence Payment mobility awards as a result of a Service- attributable condition are a relatively small cohort, yet a financially disadvantaged one compared to their peers. For veterans with a condition attributable to injury in Service after 6 April 2005, the Armed Forces Independence Payment (AFIP) provides support. For those injured before 6 April 2005, the War Disablement Pension provides a mobility allowance in lieu of a PIP claim if the injury is physical, such as limb loss. It is only those who have a severe mental health impairment, and attribute it to Service before 2005, who are currently restricted to accessing their support via PIP and subsequently subject to any issues in support levels and assessments.

The Armed Forces Covenant states that “special consideration is appropriate in some cases, especially for those who have given the most such as the injured and bereaved.” It is in the spirit of the Covenant, therefore, that we believe **there should be exploration of arrangements to ensure that those who have a severe Service-related mental health condition dating prior to 2005 are able to access vital and appropriate mobility support equal to their physically injured veteran peers, potentially through access to War Pension mobility supplements or AFIP.**

⁷³ Ministry of Defence (2018), *UK Armed Forces Diversity Statistics*.

Armed Forces Pensions

Armed Forces Pension Schemes are an area of policy delivery contained wholly within the remit of the MOD. As the department responsible for the delivery of this strategy, we therefore believe this is an area where there is scope for unilateral improvements.

At present, there is minimal advice available to veterans concerning their Armed Forces pensions, which are markedly different to civilian occupational pensions and have changed considerably recently, with some veterans consequently accruing benefits under multiple schemes. Besides Veterans UK, who principally give pension forecasts as opposed to financial advice, the only other source of impartial advice for veterans regarding their pensions comes from the Forces Pension Society, which is a membership body. Whilst the majority of efforts to improve financial literacy are targeted at those in Service or recent Service leavers, the **Legion maintains that it would be desirable for the Government to consider improving financial literacy for older veterans and those who left Service some time ago by offering either a new service that provides impartial pensions advice, or which makes use of existing expertise at the Forces Pension Society but which is freely accessible to all.**

Similarly, the Legion further maintains that Veterans UK can and should do more to reach out to veterans who either have unclaimed pensions or who are entitled to pension increases. In terms of unclaimed pensions, the Government is itself aware that around 12,000 people have not yet claimed their Armed Forces pension. Preserved pensions were introduced on 1 April 1975 for those who served for more than the minimum vesting period (originally 5 years and aged 26 or more, but subsequently reduced to 2 years and no age limit), and become payable at age 55, 60 or state pension age, depending on when the individual served and under which pension scheme, and whether they opted out or went Absent Without Leave, for example. **The Legion maintains that a new communication campaign should be run by the MOD and Veterans UK to encourage veterans unsure about their entitlement to come forward for advice.** Similarly, those veterans who were commissioned from the ranks and who subsequently served for more than two years but less than five (at which point they become entitled to a full Officer's pension) are entitled to 'a Commissioned Officer's Supplement'. Some years ago, it was discovered that this supplement was not always being paid, denying affected veterans their full pension entitlement. **Again, the Legion maintains that the MOD and Veterans UK undertake every effort to identify and contact those affected, or conduct a communication campaign to encourage veterans to come forward for advice.**

Legion welfare advisers and case officers repeatedly highlight issues with attributable benefits paid through the Service Pension Order. The Legion welcomes progress towards a full disregard for compensation payments within financial assessments, although as noted above there is still progress to be made. However, there is currently inconsistent application to any disregard for payments from a Service Attributable Pension (SAP) or Service Invaliding Pension (SIP). In line with War Disablement Pensions and AFCS, SAPs are similarly only obtainable to compensate for an injury attributed to Service, although they are administered separately under the pension scheme. SIPs, whilst not applying attributability, equally indicates injury or illness on discharge from Service. As the SAP is compensation for injury in Service, as is the SIP to a lesser extent, **the Legion would welcome national guidance to bring their treatment into line with other military compensation payments.**

The demographic profile of the veteran community highlights that there will be many veterans currently resident in the UK who served before the introduction of the 1975 Armed Forces Pension Scheme (AFPS75), including those who served under National Service. The Legion is aware that this cohort of veterans feel aggrieved that they were unable to qualify for an immediate pension if they served less than 16 years reckonable service as an officer,

or 22 years reckonable service as an other rank. For many who were conscripted into Service, long tenures may not have been desirable. Those who did not qualify for an immediate pension, but who completed at least nine years reckonable service as an officer or 12 years reckonable service as an other rank, were given a lump sum payment to help them reintegrate into civilian life. However, this gratuity was not intended to compensate for a lack of pension and many veterans, especially those that undertook a time-limited period of National Service, received no compensation at all. Furthermore, the Legion has heard from veterans within this cohort that their civilian careers were negatively impacted by the demands of National Service, calling young men up at precisely the time that their professional careers would have been taking off, and preventing them from accruing their own private pensions during their period of conscription. In this way, some National Service veterans argue that they have been financially disadvantaged twice over by military service.

The Legion's 2014 Household Survey found that ex-Service households over state pension age (65+) reported a lower average income than the UK general population.⁷⁴ Whilst the Legion recognises that before the Social Security Act of 1973 there was no legal requirement for any private or public pension scheme to preserve pension rights for those who left service before reaching the normal retirement age, we maintain that greater recognition should be given to those veterans who served in this period, especially those who did so involuntarily under National Service, often sacrificing their own careers in the process and who may now have reduced pensions as a consequence. **The Legion therefore recommends that the Government explore options to improve the finances of the pre-AFPS 1975 veteran cohort, particularly those who undertook National Service. We believe that this support should be modelled on the recent introduction of the Military Spouses National Insurance Credits Scheme, which allows spouses who accompanied Service partners overseas to claim a national insurance top up in recognition of their inability to accrue their own pension rights.**

The Legion would like to draw attention to the case of Flight Lieutenant Samantha McConnell. The Legion welcomes the flexibility shown for Flt Lt McConnell, which allowed her to be granted a waiver by the Secretary of State from Armed Forces Pension inheritance rules as she conceived her twins via IVF after she left the RAF. However, the introduction of a waiver for Flt Lt McConnell acknowledges fault in the pension regulations yet fails to address the underlying issue for similar claims. The Legion believes that now a precedent has been set, **the MOD should ensure the regulations that cover Armed Forces Pension Scheme inheritance should be amended to grant the same flexibility to all claimants. Furthermore, we welcome the precedent set by the Secretary of State in intervening to address individual injustices outside normal scheme rules, and hope that such consideration will be given to future deserving cases.**

Armed Forces Compensation

As with the Armed Forces Pension Scheme, Armed Forces compensation is a distinct area of policy that sits within the MOD. Whilst we maintain that Armed Forces compensation is intended to provide financial recompense for injury and trauma and as such should not be treated as normal income, it would be remiss not to note the impact that adequate compensation can have on debt and finance issues for those disabled because of Service.

As medical understanding and treatment for specific health conditions improves, there may need to be a review of MOD compensation schemes to ensure that adequate compensation is awarded to injured Service personnel and veterans. We therefore welcome the continued work of the Independent Medical Expert Group (IMEG) in its assessment of conditions, however we are disappointed that the IMEG is reliant on existing studies and therefore

⁷⁴ The Royal British Legion (2014), *Household Survey*. p.54

cannot progress understanding of conditions where gaps in knowledge are identified. **We recommend that the IMEG is provided with the ability to commission research where it identifies knowledge gaps which may prevent adequate compensation reaching injured veterans.**

One overarching issue with existing compensation schemes is the inclusion of time limits on claims. The Armed Forces Compensation Scheme (AFCS) provides compensation for injury, illness or death caused by service in the UK Armed Forces on or after 6 April 2005, however the time limit for claims from point of injury in most cases is seven years. The War Pension Scheme provides compensation to former personnel and their dependants for injuries and death because of service before 6 April 2005, and whilst there is no time limit for claimants, the balance of evidence generally shifts to being more onerous on the claimant seven years after claiming. Through statistics released in response to a parliamentary question, we are aware that in 2014, 2015, and 2016, the number of AFCS claims turned down for exceeding the seven year time limit was 23, 34, and 73 respectively. We can only surmise that the trend may have continued into 2017 and 2018. There are several factors that may result in late claims for compensation, including late onset of symptoms, delays in consultant diagnosis, stigma over claiming compensation or a lack of awareness among Service personnel and veterans. There are ways to address these barriers, however they will not rapidly ensure that those who require compensation are not being denied support due to them. **The Legion has long maintained a position that we do not in principle believe there should be any time limits on the ability to claim compensation. In the short-term, we therefore recommend that the Government suspend time limits on compensation claims whilst undertaking research on barriers to uptake and subsequently implementing measures to reduce late claims.**

Finally, the Legion is aware of a disparity between compensation schemes with regard to the treatment of mental health within the Mercantile Marine Scheme 1964. The Mercantile Marine Scheme provides compensation for those in the Merchant Navy who are injured as a result of combat operations, yet the scheme only recognises physical injury. The current lack of parity means that there are a cohort who are eligible for support under the Armed Forces Covenant who are blocked from compensation, including those who worked on support vessels during the Falklands War. Whilst this scheme only currently has a small proportion of the overall compensation claimants, future claimant numbers are impossible to predict. **Therefore, the Legion recommends the scheme is amended to provide compensation for mental injuries as a matter of urgency.**

Recommendations

- The Single Services increase the provision of life skills training into resettlement packages and increase prominence of financial capability training throughout Service.
- The Ministry of Defence promote MoneyForce more widely amongst the serving Armed Forces and their families, especially those starting out in their post-forces careers.
- The Ministry of Defence lead a multi-agency communication plan to warn Service families of the dangers of taking out Pay Day and other unregulated loans and continue to highlight the availability of alternative sources of finance such as an Armed Forces Credit Union.
- The Ministry of Defence commission research on problem gambling rates and behaviours in Service and implement a strategy to tackle identified issues.

- Interim arrangements are put in place until the full roll out of Universal Credit is achieved to amend the income related Employment Support Allowance means test to routinely disregard Armed Forces compensation payments.
- The Department of Work and Pensions disregard compensation payments from the Pension Credit means test.
- Arrangements are put in place to ensure that those who have a severe mental health condition as a result of Service dating prior to 2005 are able to access vital and appropriate mobility support equal to their physically injured veteran peers, potentially through access to War Pension mobility supplements or AFIP
- Indefinite Leave to Remain fees for Commonwealth Armed Forces Personnel and their dependents are waived with immediate effect
- National guidance issued on the disregard from means tests of Service Attributable Payments, and Service Invaliding Payments, in line with other compensation payments.
- Veterans UK, or an equivalent body, provide impartial pensions advice, or use the existing expertise at the Forces Pension Society but freely accessible to all.
- A new communication campaign run by the Ministry of Defence and Veterans UK encourages veterans unsure about their entitlement to come forward for advice, including those who are entitled to a Commissioned Officer's Supplement.
- The Government explore options to improve the finances of the pre AFPS 75 veteran cohort, especially those who were conscripted into National Service, via introduction of a similar scheme to the Military Spouses National Insurance Credits Scheme.
- The Ministry of Defence amend the regulations which cover Armed Forces Pension Scheme inheritance to grant the waiver received by Ft Lt McConnell to all claimants.
- The independent Medical Expert Group is provided with the ability to commission research where it identifies knowledge gaps which may prevent adequate compensation reaching injured veterans.
- There should be no time limits on claiming compensation, and in the short-term the Ministry of Defence suspend time limits on compensation claims whilst it undertakes research on barriers to uptake and subsequently implementing measures to reduce late claims.
- The Mercantile Marines Compensation Scheme 1964 is amended to provide compensation for mental as well as physical injury.

13. Key theme 4: Health and Wellbeing

Healthcare

The health of veterans across age groups, although comparable, is worse than the general public in specific areas, with many having specific needs related to Service. The NHS Long Term Plan provides opportunities to improve the general and Service-related health provisions for veterans through increased funding in key areas and improved local service coordination, but its success is in part dependant on being supported by a complimentary Green Paper on Social Care. Primary Care Networks (PCN) and Integrated Care Systems (ICS) are excellent opportunities to coordinate and ensure veterans' specific health needs are met and provide a nexus for other services such as the judicial system, and therefore **should have Armed Forces community representation, on each ICS, such as having military charities or local authority Armed Forces Champions.**

The Legion welcomes the commitment in the NHS Long Term Plan to ensure all GPs in England are equipped to best serve our veterans and their families, over the next five years the Military Veteran Aware Accreditation scheme by rolling out nationwide⁷⁵ and **would like to see the scheme expedited.**

As well as assisting veteran friendly GPs to offer extra support for veterans who may face additional challenges when they return to civilian life, the GP Veterans Accreditation Scheme is an excellent vehicle to combat two persistent problems at the nexus of veterans and the NHS – data collection and priority treatment for veterans.

We are hopeful that this scheme will improve identification and recording of veterans presenting at GPs, awareness of issues affecting veterans, and improved awareness and application of Priority Treatment, where appropriate.

However, the Legion notes that as of mid-2018, 90 out of a possible 800 West Midland GP practices (11%) signed up to the pilot⁷⁶, a somewhat disappointing figure considering its potential scope. Furthermore, no evaluation of the pilot has been released, resulting in a lack of data around its effectiveness. While the Legion continues to welcome the accreditation scheme, we recommend an evaluation of the pilot to feed learning and evidence into the national roll-out.

Identifying veterans accessing the NHS and understanding the impacts of specialised services and priority treatment is vital for improving healthcare for veterans and requires good data collection systems and practices. Being the primary point of contact with the NHS, GPs are best placed to identify and record the progress of veterans through health services but should not be the only points of data collection. Increased digitisation through the Long-Term Plan will increase data collection and analysis of the Armed Forces community, and self-assessments/digital form filling may allow patients to self-identify as veterans.

Priority treatment

Priority treatment of veterans has the potential to make a significant impact on the health and wellbeing of veterans who have Service related conditions, as the keystone for veterans accessing the NHS for service related conditions. However, since its inception there has been confusion and inconsistencies in the understanding and application of priority treatment

⁷⁵ NHS England (2018), *NHS Long Term Plan*

⁷⁶ NHS England (2018), Press Release: *GP practices across the country to become 'veteran friendly'*, accessed at www.england.nhs.uk/2018/07/gp-practices-across-the-country-to-become-veteran-friendly/

for veterans. In July 2016, the Royal British Legion assessed the knowledge and use of priority treatment of 1,351 healthcare professionals across the UK. The key findings demonstrated a very low level of knowledge and application of priority treatment for veterans:

- 74% of healthcare professionals knew 'Nothing at all' or 'Not very much' about priority treatment.
- 70% did not know how to apply the policy in their practices or believed it did not apply to them.
- 41% of individuals said they had no formal or informal way of recording whether an individual had served, and 34% did not know of any procedure to record veteran status.

In order to achieve the desired positive impact on the lives of veterans, priority treatment must be clearly defined, well understood by both health practitioners and the Armed Forces community, and consistently applied. The Legion notes that despite the recommendation of the Defence Select Committee for the Strategy to define priority treatment,⁷⁷ the opportunity has, disappointingly, been missed. Therefore, **a multi-stakeholder working group should be established, with representatives from the Armed Forces charity sector and patients, to come to an agreed definition** in a timely manner that has a genuine positive impact on the health needs of veterans and fits with the future of the NHS, and then **provide guidance to assist clinicians, particularly in determining Service-related conditions.**

Improved data collection is critical to assessing and improving the impact of priority treatment for veterans although currently there are few processes in place to record and evidence application. The current Read code/SNoMed CT Code "Served in Armed Forces" is in place, yet anecdotal evidence suggests it is not routinely and uniformly used to identify veterans accessing health care. This could be rectified with **better integration of veteran identification and recording through the GP Accreditation Scheme.**

As outlined elsewhere in this response, the Legion believes it is the duty of all statutory bodies and those delivering statutory services to 'ask the question' and ensure veterans, and family members, are identified and therefore receive the services to which they are entitled. Progress in this area has been welcome, in particular, the Legion welcomes the work carried out by the Royal College of General Practitioners on this, but more work is needed.

Consistently asking the question "Have you or a family member served in the UK Armed Forces?" and coding e-health record systems accordingly would allow effective referral to suitable support. It would also bestow a number of other benefits such as allowing more accurately informed service planning by local government or PCNs and ICSs and provide data around priority treatment cases applied across the UK.

The Legion supports further work by NHS England, NHS Digital and devolved administrations to improve the coding of members of the Armed Forces community within GP computer systems. Whilst we also support initiatives by NHS England to improve the transfer of clinical notes into the NHS as service personnel leave the services and register with an NHS general practitioner, we are disappointed by the continued delays in this project. The Legion urges NHS England and the MoD to publish a timetable for completion of this work and be held accountable against.

⁷⁷ Defence Select Committee (2018), *Mental Health and the Armed Forces, Part One: The Scale of mental health issues.* p.3

Mental Health

Meeting specific mental health care needs: Veterans

Recent research into veteran help-seeking for mental health issues has found that some veterans may fail to seek help as they cannot recognise what constitutes a mental health problem⁷⁸. The same research found that although stigma can be a barrier to seeking care for those who have never done so, veterans who had previously sought care were likely to do so again if they developed another mental health problem. However, if previous treatment sought was considered to be of poor quality, veterans were unlikely to seek treatment – whether for a worsening condition or the development of another issue.

NHS England's Transition, Intervention and Liaison Service (TILS), launched in April 2017, seeks to improve mental health care for veterans and Armed Forces personnel approaching discharge. According to figures provided by the NHS, as from April 2017 to the end of November 2017, TILS received 1,669 referrals. Since recording began for referrals appropriate for assessment (October 2017), 72.8% were deemed appropriate. Thirty per cent of patients assessed were seen for treatment within TILS, whilst some have been referred for treatment by other services, including 18% to IAPT.

In April 2018, NHS England launched the Veterans' Mental Health Complex Treatment Service (VMH CTS). VMH CTS sits within the TILS referral pathway. CTS referrals provide a range of intensive care and treatment for people with military related complex mental health difficulties. Referral via the TILS ensures that the veteran's military service has been confirmed and any interventions earlier in the pathway have been considered.

The Legion welcomes both the TILS and CTS provision of mental health support for those approaching transition, as well as for those who have already exited Service. In particular, the Legion commends the availability of a self-referring service to those who are preparing to transition, and to veterans, regardless of when they exit. Likewise, we welcome the provision of a dedicated support pathway to those with more complex conditions and support needs. However, the Legion is also aware that capacity issues are already beginning to appear within the new services in certain areas, resulting in delays and barriers to accessing this vital treatment.

The Legion believes that **NHS England should commit to publishing annual figures outlining the number of TILS referrals, assessments, and onward referrals.** This would provide valuable data around the types of issues veterans and transitioning personnel present with (including self-referral), as well as the types of support deemed suitable for this group including onward referrals to the CTS. Available data on TILS referrals is currently limited to the figures referenced above, which do not expand on assessment and treatment waiting times, onward referrals for patients, and treatment efficacy. Until such figures are available, it is difficult to assess how provision for mental health services to serving and former Armed Forces personnel in the UK meets their needs.

The Legion recommends that the NHS also gives consideration to ensuring that there is no gap in support provision for those experiencing the most complex mental health issues, who may require specialist treatment but may not be able to access it via current service provision.

The Legion welcomes the MoD's commitment to better gather data on mental health in the veteran community, especially accurately recording veterans who take their own lives,

⁷⁸ Rafferty, L, Stevelink, S, Greenberg, N, Wessely, S (2017), *Stigma and barriers to care in service leavers with mental health problems*.

suicides and open verdicts recorded by coroners. **The Legion will further welcome the timely implementation of this commitment.**

Moral injury is a relatively underserved aspect of mental health amongst serving UK Armed Forces and veterans, with little known about impact of moral injury on the well-being of this group. However, recent research suggests that moral injury may be common in veterans and, where present, having a considerable negative impact on mental health⁷⁹. **Much more knowledge and understanding about the impact and treatment of moral injury on veterans is required and this should be supported by the UK Government, not simply left to charities and universities. Moral injury should also be considered in reference to Ministry of Defence compensation schemes, ensuring that claims reflect the impact of injury due to Service.**

Meeting specific mental health needs: Families

As has been outlined from the start of this submission, veteran support must include support mechanisms for families. Spouses, partners and children of Armed Forces families currently receive mental health treatment from the NHS. However, Armed Forces families have specific needs in the way they access mental health support, experience unique stressors, and face increased risks of mental health problems^{80,81}.

The Legion believes that there may not be adequate mental health support for veteran families. Whilst some veteran mental health services accept referrals for spouses, generally spouses of veterans and children access mainstream NHS services.

Due to the unique stressors and risk of mental health problems for families, the Legion believes **there should be clear access points and care pathways for Armed Forces spouses, partners and children, including families of current or former members of the Armed Forces.**

These care pathways and mental health treatment services need to understand Armed Forces families' particular health needs and must be culturally sensitive to their experiences of Service. Much attention has rightly been focused on mental health needs of Service personnel and veterans; however, we wish to ensure that families also have access to tailored support.

Gulf War Illnesses

February 2019 marked 28 years since combat operations ended in the First Gulf War, which saw 53,462 Service personnel deployed to the Persian Gulf region in Operation Granby. However, as many as 33,000 UK Gulf War veterans could potentially be living with illnesses connected to their service in the Gulf, yet there has been little meaningful research to date regarding best practice to alleviate some of the associated symptoms.

International research has shown that, apart from accidental death, there is no increase in death from any particular physical illnesses reported in those who served in the First Gulf War. Research has also shown that cancer rates are not any higher among this particular

⁷⁹ Williamson, C, Greenberg N, and Murphy, D, (2019). *Moral injury in UK armed forces veterans: a qualitative study*

⁸⁰ Murphy, D, Palmer, E, and Busuttil, W, (2016) *Mental Health Difficulties and Help-Seeking Beliefs within a Sample of Female Partners of UK Veterans Diagnosed with Post-Traumatic Stress Disorder*. p.68

⁸¹ White, C, de Burgh, H, Fear, N, and Iversen, A, (2011), *The impact of deployment to Iraq or Afghanistan on military children: A review of the literature*.

cohort, compared to their peers.⁸² Furthermore, most studies have further failed to demonstrate any increase of other well known physical diseases, although there are some notable exceptions.

A King's Centre for Military Health Research (KCMHR) study found an excess of hypertension in ill Gulf War veterans compared to well Gulf veterans.⁸³ They were also more likely to be overweight. It is possible that this reflects the influence of problems such as fatigue and lack of exercise, which can be associated with Chronic Fatigue Syndrome, which has also been noted in some ill Gulf War veterans. The study further showed that there was an increased prevalence of a particular skin disease, seborrheic dermatitis, which whilst not particularly serious itself, can be associated with immune dysfunction. Finally, reliable studies have also shown that ill Gulf War veterans are more than twice as likely to report having PTSD than their peers.

Yet, the majority of research to date has focused on determining whether or not the symptoms displayed by ill Gulf War veterans constitute a new syndrome, and what the likely cause or causes of these illnesses were. Whilst successive US Governments have generally been more open to researching the potential source of Gulf War Illnesses, successive UK Governments have been somewhat more wary. Whatever the reason for this, existing research has thus far failed to pinpoint a specific cause or set of causes, despite widespread public belief that exposure to chemical, biological or radiological hazards, or indeed medical countermeasures intended to protect Service personnel, are to blame.

In January 2009, the MOD commissioned a Rehabilitation Research Study to support ill Gulf War veterans, which was led by researchers at Cardiff University. The project's objective was to develop a cost-effective intervention programme taking account of physical, personal, psychological, social and occupational obstacles to recovery and better functioning in ill Gulf War veterans. The Legion welcomed this research because of its focus on improving recovery outcomes for veterans. Unfortunately, however, the results of Phase 1 were never published, apparently due to difficulties enrolling veterans and keeping them engaged, and the Ministry of Defence decided not to fund the second phase of research.

The lack of any meaningful research into 'what works' for ameliorating the symptoms of Gulf War Illnesses has left many Gulf War veterans with a strong sense that their plight has been forgotten, particularly in light of the more recent Iraq campaign. The Legion believes that it is important that Parliamentarians are reminded of the ongoing health difficulties experienced by ill Gulf War veterans. **The Legion recommends that the Government secure investment for research into health and social care models that can improve recovery and quality of life for ill Gulf War veterans, communicate the results of similar research being undertaken in the US to Gulf War veterans here in the UK.**

Loneliness and social isolation

The Legion recognises that the issues of loneliness and social isolation are recognised within Key Theme 1, Community and Relationships. However, these conditions are increasingly recognised as public health hazards, which are approaching crisis levels. Research has shown that loneliness and social isolation are linked to higher blood pressure, poorer sleep, depression and increased risk of mortality⁸⁴. As such we wish to ensure that our recommendations are reflected under health and wellbeing as well.

⁸² Macfarlane et al, (2003) *Incidence of cancer among UK Gulf War Veterans: cohort study*

⁸³ Kings Centre for Military Mental Health (2010), *King's Centre for Military Health Research: A fifteen year report*.

⁸⁴ Holt-Lunstad, J, Smith, T, and Layton, J, (2010), *Social relationships and mortality risk: a meta-analytic review*.

The Legion's 2014 Household Survey of the ex-Service community found that 370,000 older veterans reported being lonely. Furthermore, over twice that number reported experiencing some relationship or isolation difficulty – equivalent to around 770,000 people. Despite these findings, research on loneliness and social isolation across the UK Armed Forces community remains scant.

In 2018, The Legion conducted research to identify the causes, extent and solutions to loneliness and social isolation in the Armed Forces Community⁸⁵. The key findings showed that loneliness and social isolation is a significant issue within the Armed Forces community:

- 1 in 4 of survey respondents indicated that they feel lonely and socially isolated 'Always' or 'Often'
- Almost 70% agreed that loneliness and social isolation are issues in the Armed Forces community.
- Moving to a new area was the most common cause of social isolation amongst survey respondents.
- Exiting the Armed Forces was the most common cause of both loneliness and social isolation.

Further findings from the research suggest that some elements of Forces lifestyle can increase vulnerability to loneliness and social isolation. These include:

- Increased volume of transitions in the Forces.
- A culture of self-reliance and avoidance of 'weakness'.
- Long periods of separation from partner and family.
- Impact of injury and/or sudden discharge on career and family.

There is a lack of data about loneliness and social isolation within the Armed Forces community in the UK, particularly in relation to serving personnel and their families. This limits knowledge of the prevalence of the issue and the ability to identify trends and related factors. This also limits effective development and targeting of interventions around loneliness and social isolation. Annual measurement of these issues will provide some data to fill in these gaps. **Following the inclusion of a question on isolation being incorporated into AFCAS, we recommend the incorporation of questions or measures for loneliness and social isolation into the remaining Tri-service annual surveys: RESCAS (Reserves) and FAMCAS (Families) surveys.**

Accurate data on the prevalence of social isolation and loneliness remains unknown within the demographics of the Armed Forces community. Several gaps in knowledge remain of the experiences of specific groups (e.g. Reservists), and the impact of new military policies on loneliness and social isolation (e.g. the Future Accommodation Model). **The Legion recommends the funding of a robust research programme focusing on the prevalence of loneliness and social isolation in the Armed Forces community. This programme should include specific strands on the experiences of minority groups including:**

- **Foreign and Commonwealth families;**
- **LGBTQ+ personnel;**
- **Carers within the Armed Forces community.**

The Legion also recommends that the MoD specifically fund research into causes of loneliness and isolation amongst serving personnel. Resources should also be allocated for longitudinal research to track Service leavers from exit to explore trends in loneliness and isolation over time.

⁸⁵ The Royal British Legion (2018), *Social Isolation and Loneliness*

The Legion further recommend that the Covenant Reference Group consider making loneliness and social isolation priorities for the Covenant Fund, to explore prevalence of the issues and support research into what interventions are most effective with the Armed Forces community.

The Future Accommodation Model (FAM) will significantly change the accommodation offer for serving personnel. A pilot of FAM was due to be launched in December 2018 and to run for three years across several locations in the UK. Findings from this report indicate that patch life provides a form of social support for many members of the Armed Forces community. Findings also highlighted that moving to a new area can cause loneliness and social isolation due to a lack of social connections, uncertainty of where to seek support, and a perceived lack of understanding from the civilian community. In light of this, **the MoD should monitor loneliness and isolation as part of the pilot of FAM, to establish whether the policy has an impact on these issues.**

The terms loneliness and social isolation are often used interchangeably; however, it is important to recognise that they are distinct concepts. While the Legion welcomes plans to tackle loneliness and social isolation across the UK, **we recommend that local and devolved governments adopt common definitions in order to align measurement criteria**, to ensure data is **comparable and that it can be used to track progress across regions. It is also crucial that devolved governments are mindful of the specific needs of the Armed Forces community, and that these needs are addressed clearly in terms of resource and delivery.**

We recommend that all local authorities include loneliness and social isolation in their Joint Strategic Needs Assessment (JSNA), or equivalent, and that they consider how additional initiatives could be targeted at members of the Armed Forces community.

Research suggests that members of the Armed Forces community may be at increased risk of loneliness and social isolation. It is therefore important that all local authorities commit to defining and understanding the issues of loneliness and social isolation in their area. Within this, we also call on local authorities to link in with existing assessments carried out in relation to the needs of the Armed Forces community at a local level. This could enable local authorities to recognise and respond to the issues of loneliness and isolation locally, as well as to explore the provision of additional initiatives or tailored interventions to members of the Armed Forces community, as required.

Education of the Armed Forces of the danger, impact and prevention of loneliness and social isolation is critical to combat this newly identified condition. **A module on social resilience for all serving personnel should be a mandatory part of resettlement provision.** The module should include: education around the triggers of loneliness and social isolation in the Forces; how to spot signs and have conversations about them; and signposting for professional support. Briefings or packs on loneliness and social isolation should also be provided to family members to help them prepare for periods of separation, moves to new areas, and final transition out of the Forces.

The HARDFACTS Monitoring and Assessment Tools are periodically used to monitor personnel progress and assess Service leavers before they are discharged, to identify any issues that might require resolution as they are discharged and establish themselves in civilian life. The tools cover a range of areas including health, accommodation and family. **The Legion recommends that questions relating to loneliness and social isolation are incorporated into these tools, to monitor and support personnel who may be experiencing these issues, and to assess whether Service leavers need additional support around these before and after discharge.**

The Legions research indicates that the pressures of Service life can lead to relationship issues and breakdown – a key risk factor for loneliness and social isolation. Findings also suggested that some members of the Armed Forces community lack trust in in-Service welfare and are reluctant to ask for support over fears about confidentiality and barriers to promotion. **The Legion recommends that the MoD fund free or subsidised relationship support, to be provided by independent organisations.** This should include investment in counselling and preventative relationship education through a blended approach, to ensure personnel or families living overseas are able to access it.

Care

The age profile of veterans is older compared to the UK general population. Almost two-thirds of veterans are estimated to be aged 65 and over (63%)⁸⁶. A significantly higher percentage of veterans are aged 75 and over (49%), compared to the non-veteran population (8%).

In 2014, Legion research estimated that there were around 300,000 veterans living in “community settings”, which includes residential care⁸⁷. While the exact number of veterans living in care homes is currently unknown, it is very likely that care residents over 80 will include a large proportion of those who were called to National Service, and therefore have a military background and first-hand Service experience.

Forecasting work has previously predicted a significant decline in the ex-Service community in the coming 10-15 years. This predicted decrease is due to the elderly age profile and estimated death rates in the community. However, the decline of overall numbers will likely be outweighed in the immediate future by the profile of complex health and care needs amongst the ex-Service community.

The Legion notes that the ex-Service community will remain elderly and very elderly as a concentrated group, with high future social care needs associated with their age profile. Equally of note are future increases proportionately in younger age veteran groups re-joining their communities and accessing statutory services.

Working age ex-Service households have previously been found to be twice as likely as the UK population to be receiving sickness or disability benefits working age adults are also more likely than the general population to report having a limiting illness. Of veterans aged 25-44 with a long-term illness, over half attribute it to their Service.⁸⁸

Health and care needs of the Armed Forces community

Legion research has found that around 630,000 members of the ex-Service community of all ages were likely to be experiencing problems getting around outside the home. Large numbers (around 720,000) experience problems with self-care, including exhaustion and pain, bladder control and difficulty looking after themselves. All of these problems peak for those aged 75 or over⁸⁹.

The ability to live independently was a key concern for those of retirement age and for those with a long-term illness or disability. One in ten of this group agreed that they need more

⁸⁶ Ministry of Defence (2017), *Annual Population Survey 2017*.

⁸⁷ The Royal British Legion (2014), *Household Survey* p.8

⁸⁸ Ibid p. 46

⁸⁹ Ibid p. 39

help to continue to live independently in their own home, with one in ten also agreeing that they struggle to cope looking after themselves.⁹⁰

Despite the above findings, the Household Survey of the UK ex-service community in 2014, indicated that those aged 65 or over in the ex-Service population and particularly those aged 75 or over were less likely to report the majority of conditions compared with the UK population of the same age. This suggests that the retired ex-Service community enjoyed better health than is average for the UK.⁹¹

As life expectancy increases and the National Service generation increasingly moves into the older age brackets, the Legion estimates that the number in the ex-Service community aged 85 and over is set to increase significantly. Correspondingly, well-funded and accessible social care provision will become increasingly important to veterans and their dependents in the UK.

For younger veterans, research has found that between 2001 and 2014, 21,756 personnel were medically discharged from the Armed Forces for physical and mental health reasons, with 840 sustaining serious or very serious physical injuries or illnesses in recent conflicts. Those whose injuries are the most severe and whose care needs are complex require specialist rehabilitation and ongoing care, and some receive this (at least temporarily) in a residential setting, a care home or nursing home.⁹²

Caring responsibilities

Legion research has found that in addition to their own needs, one in five of the ex-Service community have reported some unpaid responsibility as a carer for a family member, friend or neighbour, which is equivalent to around 990,000 people.⁹³

Compared with the adult population of England and Wales, the ex-Service community is more likely to have some caring responsibility. The difference is greatest for those aged 16-34, so this difference is not explained by the older age profile of the ex-Service community. In total, 23% of those aged 16-64 have reported a caring responsibility, compared with 12% nationally.⁹⁴

One in ten of all carers in the ex-Service community agree that they struggle to cope with their caring responsibilities; equivalent to around 110,000 people. Carers aged 75-84 and those with a long-term illness themselves are slightly more likely to agree (around 15%).

Young carers from Armed Forces families have also been highlighted as a particularly vulnerable group due to the compounding impact of military lifestyle on their caring duties, including increased mobility, the impact of deployment on the family, and limited support from wider family and friends due to increased transience.⁹⁵

The Legion recognises that in many cases, families and friends take on unpaid caring responsibilities due to a shortfall in funding and formal care provision.

The Legion believes that families and friends can offer a caring role but that this should not extend to replacing formal and specialised care. The Legion highlights that carers are an

⁹⁰ Ibid p. 20

⁹¹ Ibid p.39

⁹² Demos, (2015), *Under Served*, p.9

⁹³ The Royal British Legion (2014), *Household Survey*, p.26

⁹⁴ Ibid p.26

⁹⁵ The Children's Society (2017), *Young Carers in Armed Forces Families*. p.9

extremely crucial part of care provision and may represent a vulnerable elderly group themselves in the ex-Service community. **If this support is to be taken into account, then funded support and respite for veteran, and veteran family, carers must be included within any fair and sustainable care system.**

The importance of adult social care

The Legion believes that adult social care is vital to allow veterans to maintain independence and to live safely in their own home, and to support the most vulnerable to live with dignity. Enabling people to remain in their own homes for as long as possible can increase independence and overall wellbeing.

Where effective, adult social care can prevent unnecessary hospital or care home admissions. Well-funded, high quality social care also relinquishes some of the onus put on families and close friends in providing care to loved ones, enabling them to instead spend quality time with them. This in turn can have positive effects on wellbeing and relationships for both.

Where adult social care is insufficient or ineffective, the most vulnerable in society often lose out. Lack of social care can lead to increased isolation, increasingly poor health, and a resultant strain on the NHS and other health and care provision.

The Legion believes it is important that decisions around adult social care and support are made at local level. This allows for local demographics to be catered for better, including areas which have large Armed Forces populations. Where care is provided at a local level, the particular needs and profile of the Forces community could be more thoroughly considered and could in turn lead to increased awareness among veterans and families of health and care resources available to them.

While it is important that care and support be tailored at a local level and take account of specific local needs, we believe this should not be at the expense of a minimum level of service and quality and reasonable standards being met across all local authorities.

Funding systems

The Legion's care homes provide a vital service for the ex-Service community. However, as a care home provider, the Legion recognises the current pressures in recruitment and retention of staff in the adult social care workforce which in turn will impact on the support that can be offered to veterans and their families. **The Legion believes these pressures must be acknowledged and funded appropriately, in order to avoid increased strain on budgets, and the loss of skilled staff who provide high quality, suitable care.**

The Legion emphasises that a new funding system must reflect the increasing complexity of medical and care needs. Funding currently often falls below what is required by an individual. For example, funding may be granted for a bed in residential care for an individual with 'simple' needs, when in reality, they may have multiple or complex needs requiring intensive nursing support. Although further funding may be available, it risks being unable to meet the true cost of care and this in turn puts strain on staffing and ultimately recruitment and retention.

Similarly, reductions in funding have resulted in high levels of unmet need as more people are deemed ineligible for support due to lack of available funds. Further, the NHS fee rates are not sufficient to pay for the actual costs of providing high quality, person-centred care. This is compounded when beneficiaries access both residential and nursing care with far

more complex needs than originally required, exacerbates the situation and the gap between necessary funding and that provided.

The Legion notes that any future funding system must address the reality of the whole social care system. Funding solutions both for domiciliary care and residential care are inextricably linked with each other. The Legion primarily would encourage a system that enables individuals to live independently in their own homes for as long as possible. However, a future care and support system must be designed with both arenas of care in mind to prevent or mitigate unintended consequences of only catering for one type of care funding solution.

More broadly, the Legion believes that a health and social care system should be holistic; to ensure that funding for care follows the individual. For example, in some cases funding for a bed in a care home may be more appropriate than funding for a hospital bed. This requires a joined-up approach with a whole system viewed together – one in which funding follows an individual's needs.

As a result of the Legion's Insult to Injury campaign, which we were pleased to work with the LGA on, from 10 April 2017, England, Scotland and Wales social care financial assessments were amended to remove a significant anomaly, which had previously meant injured veterans' compensation payments were subject to only a £10 disregard. The Legion strongly welcomed the change to disregard War Disablement Pension and Armed Forces Compensation Scheme payments from the social care means test, which brought much needed fairness and financial relief to veterans who had been previously injured in Service. **We believe that any future financial settlement must continue to honour the principle that Service compensation should not be regarded as normal income or diminish this disregard in any way. We also maintain that veterans in Northern Ireland should, like their counterparts in the rest of the UK, have their compensation payments disregarded from social care financial assessments.**

The Legion offers high quality care to all beneficiaries. Our care homes are accessed by both those who can pay for the costs of their own care and by local-authority funded beneficiaries. This is despite significant differences in fees received. Furthermore, unlike some other providers, the Legion makes no distinction in the services we provide - regardless of how the care has been purchased. However, we are concerned about the significantly rising costs of care, and how this could inevitably impact on the capacity, costs and quality of our services. **We believe that national and local governments must ensure that local authorities look to the true cost of care provision when assessing a budget for meeting an individual's care needs, and reflect this in personal budgets to avoid increasing top up fees falling onto those who need care most or pricing people out of access to quality care provision.**

Protection of assets

The majority of veterans residing in Great Britain have been estimated to either have owned their own property or had a mortgage (75%); consistent with the non-veteran population (77%)⁹⁶

The Legion's 2014 Household Survey found that the net annual household income for pensioners was £19,700, compared to a level of £15,900 reported by those aged 65 and over in the ex-Service community. This suggests the potential for greater poverty in the ex-Service pensioner community than in the UK as a whole.

⁹⁶ Ministry of Defence (2018), *Annual Population Survey 2017*

As the veteran population therefore may have a larger proportion than the general population of their assets secured within their house, any funding system that entails the selling of property may affect this cohort significantly. **The therefore Legion believes that individuals should not be forced to sell their own homes to pay for social care in their own lifetime.** Most veterans have previously lived in many different places in the UK and abroad during their time in the Armed Forces. Due to this mobility it was often not practical for serving personnel to buy or reside in their own homes. As a result, the value of a home and stable location can be magnified for veterans due to the previous mobile lifestyle.

The Legion notes that **older veterans require a care and support funding system that is flexible to allow schemes such as equity release or insurance schemes that allow protection of assets should an individual need social care.** However, **the advantage of having assets should not be taken as given when considering a future care and support system**, as younger generations are unlikely to have the same asset or savings profile as generations before.

Northern Ireland

One participant in the Belfast focus group we held brought up difficulties he had experienced in accessing mental health treatment as a veteran. He was offered only ten sessions of Health and Social Care in Northern Ireland therapy, and although he was able to obtain four more through sustained lobbying of his health provider, he was then not able to access any further. Whilst we recognise pressures on the health service exist in all nations of the UK, **it is vital that mental health treatment is not subject to an arbitrary session limit**, leaving vulnerable veterans unable to access further support.

Focus group participants in Northern Ireland further highlighted a lack of veteran residential and secure substance misuse treatment centres in the region currently risking disengagement and delays in treatment for those who need it most. It was raised that there are currently veterans who have needed to be referred for substance misuse treatment to other parts of the UK and to the Republic to receive treatment.

Recommendations

- Implementation of the NHS England Long Term Plan ensures there is Armed Forces Community representation, or opportunity for Armed Forces Community representation, on each Integrated Care Systems, such as military charities or Local Authority Armed Forces Champions.
- Roll out of the GP veterans accreditation scheme is expedited.
- A multi-stakeholder working group with representatives from the Armed Forces charity sector and patients is established to come to an agreed definition of Priority Treatment in a timely manner that has a genuine positive impact on the health needs of Veterans and fits with the future of the NHS. Output includes guidance to assist clinicians, particularly in determining service related conditions.
- The GP Accreditation Scheme sets a Key Performance Indicator target of increasing Read Code take up amongst the veteran community.
- NHS England and the MoD publish a timetable for completion of work to enable the transfer of clinical notes into the NHS as service personnel leave the Service.

- NHS England commit to publishing annual figures outlining the number of TILS referrals, assessments, and onward referrals.
- NHS England give consideration to ensure that there is no gap in support provision for those experiencing the most complex mental health issues, who may require specialist treatment but may not be able to access it via current service provision.
- The Ministry of Defence provide assurance that the commitment to accurately record veterans who take their own lives, suicides and open verdicts by coroners is underway.
- Further research is undertaken, and the results translated into Service provision, on the impact and treatment of moral injury on veterans.
- Moral Injury is considered in reference to Ministry of Defence compensation schemes, ensuring that claims reflect the impact of injury due to Service.
- There are clear access points and care pathways for Armed Forces spouses, partners and children, including families of current or former members of the Armed Forces.
- The Government secure investment for research into health and social care models that can improve recovery and quality of life for ill Gulf War veterans, communicate the results of similar research being undertaken in the US to Gulf War veterans here in the UK.
- The incorporation of questions or measures for loneliness and social isolation into the remaining Tri-service annual surveys.
- The Government funds a robust research programme examining the prevalence and causes of loneliness and social isolation across the Armed Force community.
- The Ministry of Defence monitor impact on loneliness and social isolation in the pilot of the Future Accommodation Model.
- Local and devolved governments adopt common definitions of loneliness and social isolation.
- Local authorities include loneliness and social isolation in their Joint Strategic Needs Assessment (JSNA) or equivalent, and that they consider how additional initiatives could be targeted at members of the Armed Forces community
- The introduction of a module on social resilience for all serving personnel as part of resettlement provision, with a focus on loneliness and social isolation and preparation for transition out of the Forces.
- The Single Services incorporate specific questions about loneliness and social into the HARDFACTS Assessment and Monitoring Tools.
- The introduction of centrally funded relationship support for couples experiencing issues related to service both within Service and following transition.
- Any funding settlement for the Care system in England must: take into account funded support and respite for carers; ensure decisions around adult social care and

support are made at local level; provide minimum standards of care; acknowledge and fund pressures within the care provision sector; reflect the increasing complexity of medical and care needs; and continue to honour the principle that Service compensation should not be regarded as normal income or diminish this disregard in any way.

- Northern Ireland end a disadvantage veterans face compared to their Great Britain contemporaries by exempting compensation payments from social care financial assessments.
- National and local governments must ensure that local authorities look to the true cost of care provision when assessing a budget for meeting an individual's care needs and reflect this in personal budgets to avoid increasing top up fees falling onto those who need care most.
- Veterans are never forced to sell their own homes to pay for social care in their own lifetime. A new care and support funding system is flexible to allow schemes such as equity release or insurance schemes that allow protection of assets should an individual need social care.
- Mental health treatment in Northern Ireland is not subject to an inflexible session limit, leaving vulnerable veterans unable to access further support.

14. Key Theme 5: Making a Home in Civilian Society

Moving home after Service presents a number of challenges⁹⁷ and there remains a popular misconception among the British public that homelessness is both a common outcome of leaving the Armed Forces and that a large proportion of those who sleep rough in the UK are veterans. The reality is that the vast majority of veterans manage the transition from Service into a new, settled and secure home successfully. As the Strategy notes, a number of measures show no substantial difference in the housing status of veterans when compared with civilian peers.

However, the above does not diminish the importance of housing difficulties and homelessness among the veteran community. **No one who has served in the UK's Armed Forces should face homelessness.** A 2007 National Audit Office survey of veterans undergoing the resettlement programme found that 5% of respondents, mainly young and of junior rank, reported that they had experienced some form of homelessness at some point in the past two years.⁹⁸ More recently, the University of York reported on usage rates of the Single Persons Accommodation Centre for the Ex Services (SPACES), a housing advice and placement service. Since 2009, SPACES has supported an average of 1,000 single veterans a year, 84% of whom report that their homelessness was a consequence of discharge from the Armed Forces.⁹⁹ The transition from Service to civilian life clearly can be a cause of homelessness for a number of veterans.

Housing allocations

Veterans with difficulties in securing suitable accommodation can of course turn to local authority provided housing for help. Indeed, in 2017 nearly 7,000 households given a new social housing letting included someone who has served in the Armed Forces, approximately 2% of total lettings.¹⁰⁰ However, in the Legion's experience, this is not always a smooth process. Our services are frequently required to help veterans and their families navigate their way through the complex process of applying for social housing, and we still come across great variation between local authorities in the way that support to ex-Service personnel in search of social housing is provided. The Legion's Household Survey in 2014 found that 6% of those who had been discharged from the Armed Forces in the past five years experienced some difficulty in applying for council or housing association accommodation.¹⁰¹

Commonly, we find that local authorities do not understand the exemptions to the local connection requirement for veterans who have left the Armed Forces in the previous five years. We believe that this policy should be simplified by removing the five-year time limit. Service leavers can be unsure at the point of transition back to civilian life where in the country might be most suitable for them in regard to various factors including family life, employment opportunities, or housing. If discharged unexpectedly due to injury or other circumstances, the veteran may not be able to decide on long term housing arrangements, an example typified by War Widow(er)s dealing with bereavement whilst searching for accommodation. As families and individuals can sometimes make a few moves and change circumstances in the first years after leaving the Armed Forces, there may be multiple contributing factors to a delay before an application for housing is submitted. Therefore, **as a minimum we would like to see flexibility included in the policy to enable a waiving of the five-year time limit on a discretionary basis. Long term, we would like to see the**

⁹⁷ Forces in Mind Trust, (2013), *Transition Mapping Study*

⁹⁸ Ministry of Defence and National Audit Office (2007), *Leaving the Services*. p.10

⁹⁹ University of York, (2014), *Meeting the housing and support needs of single veterans in Great Britain*, p. 26

¹⁰⁰ Ministry of Housing, Communities and Local Government, (2018), *Social Housing Lettings in England* p. 20

¹⁰¹ The Royal British Legion (2014), *Household Survey*, p.60

five-year time limit removed altogether, allowing veterans to access housing support with an exemption from the local connection requirement regardless of the time elapsed since they left Service.

Rough sleeping and homelessness

As mentioned previously, there is a common misconception that a large proportion of those who are sleeping rough in the UK are veterans. The scarce data that does exist suggests that rough sleeping does not occur disproportionately among veterans. A contributing factor to this misperception is the lack of consistent nationwide data counting the number of veterans sleeping rough. The annual rough sleeper count in England mandated by the MHCLG does not include questions about serving in the Armed Forces, and the overall methodology of this count has been criticised in the past for underestimating populations. A more robust assessment of rough sleeping exists in the form of the Greater London Authority's Combined Homelessness and Information Network (CHAIN)¹⁰². CHAIN is a multi-agency database recording information about rough sleepers and the wider street population in London. It acts as a continuing record of all contact by outreach teams, every day of the year. Uniquely in England, CHAIN enables analysis of those who have presented as having a history of serving in the Armed Forces. **We would like to see a system of similar quality rolled out across England to allow accurate data capture on the number of rough sleeping veterans.**

In April 2018, the provisions of the Homelessness Reduction Act 2017 came into force in England. We welcome the Act's emphasis on early intervention and prevention of homelessness, and in particular the increased provisions for veterans. It remains to be seen what effect this has on the Armed Forces community but it is important to acknowledge that as a result of the Act, housing authorities are now recording veteran status on all applicants for homelessness support through MHCLG's Homeless-Case Level Information Collection (H-CLIC) system. We hope this will, in time, present a clearer picture of the need for homelessness support among the veteran population and contribute towards building a comprehensive picture of the housing needs of the Armed Forces community. **Local authorities should also use this data to assess demand on existing homelessness services for veterans in their area.**

Hidden homelessness

While lacking comprehensive data, there is strong anecdotal evidence of a likely small but significant hidden homeless community amongst the UK veteran population. Research undertaken by the University of York in 2014 states that during interviews with stakeholders, hidden homelessness was brought up repeatedly:

Even less was known about veterans who might be sleeping rough, or 'hidden homeless', for example, sofa surfing and staying with family and those that did not, for whatever reason, approach statutory agencies. Overall, service providers did not believe that rough sleeping was a significant problem, however, many respondents – including those working with veterans – suggested that 'hidden homelessness' and various forms of unsustainable housing arrangements, were not uncommon.¹⁰³

By nature, gathering reliable data on the hidden homeless community will always be difficult but as with rough sleeping veterans, **capturing this data is necessary in order to build a comprehensive picture of the housing needs of the veteran community.**

¹⁰² Mayor of London (2018), CHAIN Report

¹⁰³ University of York (2014), p.66

Skilling staff and asking the question

Recent research has highlighted that more needs to be done to upskill frontline staff in local authorities regarding the Armed Forces Covenant. Over a third of all councils in Wales, England and Scotland have no mechanism in place for briefing staff on the Armed Forces Covenant (39%). Within the Armed Forces community, only 4.5% felt that all councils had a good understanding of their needs.¹⁰⁴ This lack of knowledge is a repeated theme brought up in Strategy consultation responses we have been copied into. One respondent typified this theme, “I have found dealing with public bodies a waste of time as they have no understanding of a veteran’s needs.”¹⁰⁵ **We recommend that the Government appropriately resource local authorities to ensure that all housing authority staff across the country are aware of the policies specific to the Armed Forces community.**

Ultimately, the utility of any specific housing measures designed for the veteran community are dependent upon the successful identification of such people. In keeping with the Strategy’s cross-cutting factor on data for the veteran community, we believe that all government services should proactively “ask the question” as to whether a presenting applicant for support has ever been a member of the UK’s Armed Forces. Many services have the ability to record this information already, yet our experience shows that reliance on proactive self-identification fails to uniformly identify the ex-Service population and therefore provide them with appropriate support services. Without knowing the benefits it may bring, veterans may see no relevance in disclosing their Service history if not asked. **Identification of a veteran at the point of contact with a government service would enable appropriate sign posting to the most appropriate support services.**

Families and divorced and separated spouses

Under this key theme it is once more important to note that the family members of our veterans are too often overlooked in discussions around the provision of services. They make great sacrifices and provide invaluable support, which enables our serving personnel to thrive both in and after their career in the Armed Forces. As we noted in our 2017 General Election manifesto, when an Armed Forces couple separate or divorce, the spouse ceases to be recognised as ‘family’ under the Armed Forces Covenant, meaning that they are no longer eligible for certain allowances, for instance in relation to local connection criteria for social housing. In many cases, divorced or separated Service spouses receive no additional help in finding a home after the divorce or separation is confirmed and they have moved on from their previous house.¹⁰⁶

We recommend that in all of the above mentioned areas of concern regarding making a home in society after Service, due consideration is also given to the provision of assistance to the families of veterans; including those in families which have broken down. This is particularly relevant in relation to divorced or separated partners who are seeking assistance finding suitable housing following separation from a serving or recently serving member of the Armed Forces. The principles of the Armed Forces Covenant apply to the whole Armed Forces community, and this community includes the families of serving and ex-Service personnel.

We are pleased to note the recent publication of the MHCLG consultation *Improving access to social housing for members of the Armed Forces*. This includes proposals to remove the disadvantage caused by local connection requirements on divorced and separated spouses, but disappointingly excluding other partners of Armed Forces personnel. We note that the

¹⁰⁴ Shared Intelligence (2016), pp.12- 16

¹⁰⁵ Supporter or beneficiary response to the Strategy, captured via the Legion’s website.

¹⁰⁶ The Royal British Legion (2017), *General Election Manifesto 2017*

consultation only covers England and we would wish to see such a change enacted across the UK to ensure no disadvantage.

Northern Ireland

Housing provision in Northern Ireland is run via a points system for eligibility. Those who are eligible will then be offered a maximum of three properties. The Legion's team in Northern Ireland regularly see veterans who are unable to accept the properties offered as the areas in which they are located could pose security concerns for them and their families. After refusing the offers on account of legitimate concerns, veterans are left in a vulnerable position without access to safe and secure accommodation. **The Legion therefore recommends that the Housing Executive in Northern Ireland introduce flexibility and discretion in their allocation policies to allow veterans to refuse areas that may be perceived as unsafe for them or their family, without it impacting on their eligibility for further support.**

Recommendations:

- Ministry of Housing, Communities and Local Government amend local connection exemption rules for veteran applicants to social housing by removing the five-year time limit.
- Local authorities improve the capture of data on rough sleeping veterans, possibly through the use of a system like London CHAIN across England.
- Local authorities use data gathered from the new H-CLIC recording system to assess demand on homelessness services from veterans.
- The Government explore methodologies for gathering accurate data in order to support veterans who are 'Hidden Homeless.'
- The Ministry of Housing, Communities and Local Government and the Ministry of Defence resource local authorities so that they can provide the training necessary to skill housing authority staff on the correct procedures and options open to veterans.
- Local authorities ensure that all members of the public approaching government services are asked the question of whether they have previously served in the Armed Forces.
- The Ministry of Housing, Communities and Local Government and local authorities extend the provisions in housing services that are granted to veterans to their families and also to divorced and separated spouses and partners.
- The Housing Executive in Northern Ireland introduce flexibility and discretion to their allocation policies to allow veterans to refuse areas that may be perceived as unsafe for them or their family, without it impacting on eligibility for further support.

15. Key Theme 6: Veterans and the law

The Legion recognises that whilst estimates vary, the most reliable assessments of the veteran prison population show that the Armed Forces community make up just a small proportion of prisoners in England and Wales. There is also little available evidence from which to surmise a causal link between veteran status and offending behaviours, although further research is needed. A study by MacManus et al found that ex-service personnel are less likely than their civilian counterparts to have contact with the criminal justice system although where they do it is significantly more likely to be as a result of violent and sexual offending.¹⁰⁷ With that in mind, it was noted in a focus group that inclusion of justice as a key theme in the strategy in of itself risks reinforcing the negative stereotypes referenced in Cross Cutting factor four.

The most recent experimental statistics provided by the Ministry of Justice show 4.0% of the prison population are ex-Service personnel, reducing to 3.6% when matched to UK nationals in order to reduce the likelihood of veterans of foreign militaries being included.¹⁰⁸ The experimental statistical release further found that those in the ex-Service personnel cohort are on average nine years older than civilian prison population group.

Previous research projects on the numbers of veterans in prison have produced varied results but add to our understanding of this cohort. Some of the key findings are summarised below^{109,110}:

- Home Office research in 2001, 2003 and 2004 found that veterans made up six, four and five per cent (respectively) of 2,000 prisoners surveyed at the point of release.
- Small scale surveys by the National Association of Probation Officers, published in 2008, found that around nine per cent of the UK prison population and around six per cent of those under supervision by probation services had an ex-Service background (based on self-reporting, with no verification of Service history).
- Reports by the Ministry of Defence's Statistical Agency (previously known as DASA) in 2009 and 2010 matched existing data on prisoners and UK veterans, concluding that veterans are likely to account for around 3.5 per cent of all prisoners. Male veterans aged 18-54 were less likely than the general population to be in prison, but more likely to be in prison for sexual offences.
- HM Inspectorate of Prisons published findings from a 2012 survey of 4,731 adult male prisoners and found that seven per cent of prisoners identified themselves as having an ex-Service background (also based on self-reporting, with no verification of Service history). Within high security prisons and category B training prisons, thirteen per cent of prisoners identified themselves as veterans. Across all surveyed prisons, veterans were more likely than other prisoners to be serving longer sentences.
- Kelly for the Ministry of Justice in 2014 presented evidence from two surveys of veterans in the criminal justice system which found that Veterans were likely to be older than the general population in prisons and had similar or lower levels of need in many areas when compared with those who had not served in the Armed Forces. However, there were some areas, such as alcohol misuse, where a greater degree of support may be necessary.

¹⁰⁷ MacManus, D, Dean, K, Jones, M, Rona, R, Greenberg, N, Hull, L, Fahy, T, Wessely, S, and Fear, N, (2013) *Violent offending by UK military personnel deployed to Iraq and Afghanistan: a data linkage cohort study*

¹⁰⁸ Ministry of Justice (2018), *Experimental Statistics Ex-service personnel in the prison population, England and Wales*

¹⁰⁹ The Royal British Legion (2012), Literature review: UK veterans and the criminal justice system

¹¹⁰ Kelly, J, (2014) *The needs of ex-service personnel in the criminal justice system: Evidence from two surveys*, Ministry of Justice

The Howard League for Penal Reform in 2011 noted that, whilst veterans appear to represent a similar proportion of the total prison population as women do (at previous levels of around five per cent of all incarcerated offenders), we knew little about the needs profiles of veterans in prison. In contrast, in part due to the use of separate prisons for women, there was a large amount of data on female prisoners, including on mental health needs, suicide attempts and experiences of victimisation. We were therefore pleased to see further research in the area, including Kelly's 2014 findings, Kings Centre for Military Health Research studies, and the publication of the Phillips Review. However there remains inconsistency with reliable data on the veteran population in the criminal justice system and as Kelly points out, the surveys used for their needs analysis is limited to a demographic that may have significantly changed: "the numbers of ex-Service personnel may have changed since the surveys were conducted, meaning they may not accurately represent the current ex-Service personnel population. For example, many ex-Service personnel who served during the wars in Iraq and Afghanistan will not be captured in these surveys."¹¹¹ **The Legion would therefore welcome further research not just into numbers, but into the demographic and need profile of the veteran population currently within the UK's criminal justice system.**

We further wish to draw attention to the premise that central to any discussion of this issue is the idea that there is a causal link between experience in the Armed Forces and criminality. Various factors have been suggested as contributing towards the likelihood of criminality - these include:

- length and culture of Service leading to institutionalisation,
- compulsory discharge or being an Early Service Leaver,
- the difficulty in undertaking transition back to civilian life,
- combat experience,
- high levels of Post Traumatic Stress Disorder.

There is some research on the subject and a link has been proposed in research between combat in operational theatres and veterans subsequent experiences¹¹². Similarly, in Fossey et al's Project Nova in 2017, over half of the cohort approached who had been in contact with Project Nova via the criminal justice system had experience of operating in areas of combat. Furthermore "Of the 15 participants that did not serve in combat areas, nine (26%) were Early Service Leavers (those with less than four years' service) and the other six had served for longer than four years."¹¹³ However, it is worth noting that roles with exposure to combat experience may be more likely to be drawn from ranks of the Army where adverse childhood experience and experience of family deprivation may be more prevalent. Therefore, on the available evidence the Legion supports the view expressed by those including the Howard League that rather than Armed Forces experience in some way increasing offending risk, that instead the drivers of crime amongst ex-military personnel are generally the same as those found with the general prison population. As the League argues:

"...crime tends to be spatially concentrated in areas of socio-economic disadvantage and is associated with and exacerbated by low educational attainment, family deprivation, drug and alcohol abuse, homelessness and poor health."¹¹⁴

¹¹¹ Kelly, J, (2014). p.3

¹¹² MacManus et al (2013)

¹¹³ Fossey, M, Cooper, L, Godier, L, and Cooper, A, (2017), *A Pilot Study to Support Veterans in the Criminal Justice System Final Report*. p.26

¹¹⁴ The Howard League for Penal Reform (2011), *Report of the Inquiry into Former Armed Service Personnel in Prison*

The Howard League research found that the ex-Service personnel in prison shared many of these experiences and histories with those in prison who had not served. The Armed Forces, in particular the infantry, often recruit from areas of socio-economic disadvantage and individuals whom might be considered in some cases to have low educational attainment or experience of family breakdown. It is therefore vital that if offending rates of veterans are to be reduced, there are targeted interventions early on within military populations who may be more at risk. MacManus et al suggests that any action for targeted interventions need to be based on evidence, with alcohol misuse and aggressive behaviour the focus.¹¹⁵

Despite the numbers reported pointing towards a background in the Armed Forces reducing the likelihood of offending, the prisoner group is still significant and represents only one interaction with the criminal justice system. As the consultation document points out, those entering the criminal justice system are also likely to be the “most vulnerable with interconnected needs”. We therefore would welcome further interventions from the Government and all sections of the criminal justice sector to research and meet the needs of this group to reduce the correlation further.

Phillips Review

We note that the consultation document states that the Government has committed to improving upon each of the recommendations contained within the 2014 Phillips Review, which looked at veterans in the criminal justice system. The Legion fed into the review and welcomed its publication as a timely intervention into support for veterans. However, we are unaware of the nature and timetabling of these commitments, as many of the recommendations remain necessary.

The recommendations contained within the Phillips review were¹¹⁶:

1. Within six months of the publication by the King's Centre for Military Health Research of their study examining domestic violence on the part of those who have served in the Armed Forces, the Secretary of State should make a statement to Parliament addressing the issue of domestic violence by former Service personnel and the steps being taken across Government to address any issues identified as affecting this cohort of offenders and to prevent their offending.
2. Data as to the numbers of those who have served in the Armed Forces and find themselves either in custody or subject to intervention by probation services should in future be routinely captured by the Ministry of Justice. Alongside such data, details of the offences committed and the risk factors associated with, and characteristics of, offenders should be analysed.
3. At every stage of an interaction between an offender engaged with the criminal justice system and a professional working within that system, information should in future be captured and recorded as to whether or not that offender has formerly served in the Armed Forces.
4. Within twelve months, the National Offender Management Service should, (a) refresh its guidance on working with former Service personnel in custody, and (b) publish additional guidance addressing the needs of former Service personnel who have offended and are being dealt with in the community.

¹¹⁵ McManus et al (2013)

¹¹⁶ Stephen Phillips QC MP (2014), *Former Members of the Armed Forces and the Criminal Justice System. A Review on behalf of the Secretary of State for Justice.* p.44

5. To ensure the effectiveness of the Victims in Custody Support Scheme and its proper implementation nationally, the Ministry of Justice should make such elements of the scheme as are necessary to embed it within the custodial and probation services mandatory. Ongoing training should be offered to all criminal justice professionals working in these areas.
6. All Liaison and Diversion schemes should develop pathways specific to those who have served in the Armed Forces. The assessment of such pathways should form a distinct part of the evaluation and development of best practice.
7. Any directory of healthcare services and providers which is created in accordance with the recommendations of Lord Ashcroft's Veterans Transition Review should be extended to include all relevant or accredited specialist support services and service providers offering interventions for former service personnel who have found themselves engaged with, or are at risk of engagement with, the criminal justice system.
8. The Ministry of Justice should work with the Home Office to ensure that every police force in England and Wales implements a specific programme of training for officers to assist in the identification and referral of former Service personnel in police custody to support services able to assist in preventing their offending behaviour.
9. In conjunction with other government departments and police forces across the country, the Ministry of Justice should implement a court diversion and peer mentoring scheme for former Service personnel, centred on the major criminal justice centres within each circuit in England and Wales.
10. The National Offender Management Service should in future work with service charities and other bodies (possibly including the cross-government Covenant Reference Group) to ensure the coordination of support from both statutory agencies and Service charities to former Service personnel who have offended.
11. A senior civil servant within the Ministry of Justice reporting to the Secretary of State should be appointed to have responsibility for former Service personnel engaged with the criminal justice system, with the aim of ensuring an identifiable national strategy implementing best practice across England and Wales for dealing with this cohort of offenders.
12. The Secretary of State should report annually to Parliament on the progress which has been made in addressing the needs of former Service personnel who find themselves engaged with the criminal justice system.
13. Training as to the issues affecting former Service personnel should be offered to all levels of the judiciary, and publications dealing with diversity and fair treatment should be amended to deal with this group of offenders.
14. Training as to the issues affecting former Service personnel should be encouraged for criminal defence solicitors and counsel as part of the fulfilment of their continuing professional development requirement.
15. The issue of former Service personnel within the criminal justice system and of their offending should be considered as one of the priorities for the 2015/16 annual £10m LIBOR fund

The year follow up to the Review published by the Ministry of Justice, entitled *Update on progress in addressing the needs of ex-armed Services personnel in the criminal justice system*, categorised these recommendations into five themes. Against these themes, the report gave high level overviews of planned and completed initiatives. Again, the Legion welcomed the commitments to the themes raised by the review, however we are not aware of any comprehensive document that evidences the pledged progress against individual themes.

We are aware that some of the recommendations, including the fifteenth, are no longer outstanding, however many are. Without definitive measurements of progress against these recommendations, there is little to support the statement that progress is being made five years on from publication.

The Legion recommends the Government publishes a five-year statement on progress against the recommendations in the Phillips review. Importantly, this statement should address each recommendation individually. Publication of this five-year review will enable the Armed Forces sector who work to support veterans in the criminal justice sector, understand the public policy landscape in order to plan any investment in interventions accordingly.

Veteran champions

Over the past few years, the Legion has been pleased to note initiatives introduced which have sought to increase knowledge of veteran needs via named “champions” and training packages. The Legion has been pleased to work with and support partners where we can to ensure that the needs of veterans are being met. However recent research undertaken by Anglia Ruskin University has illustrated the patchy provision of champions in the Criminal Justice System, showing more needs to be done to meet the fifth recommendation of the Phillips Review outlined above.

Anglia Ruskin research identified just 58 Police suites with a Veteran Police Champions. There were none identified in Northern Ireland. Only 33% of Police Custody Suites around the UK have a Veteran Police Champion¹¹⁷. A significant further concern highlighted by the report was that there was no reported Veteran Police Champion in London.

In reference to prisons, Anglia Research further highlights that whilst external support providers enabled all eligible prisons in England to have veterans specific service provision. Only 78% of prisons in England had this provided via a Veterans In Custody Support Officer (VICSO). There are no VICSOs in Northern Ireland. The Legion maintains that a VICSO presence should be a minimum requirement for veterans’ provision in prisons, and external support providers should be brought in to enhance that support where cohorts require. VICSOs may not only provide a focal point for veterans and veterans service providers within the prison estate, they also can provide valuable knowledge of the range of support being offered currently in the UK to veterans.

Lastly, champions in the public sector are most effective where they have dedicated resource, training and job specifications to work within. It is the Legion’s experience that Armed Forces and veteran champions across the statutory and private sector vary significantly in their impact as they are regularly reliant on personal passion. The champion role is by default an extra stream of work on top of a full-time role.

¹¹⁷ Cooper, L, Jones, M, and Fossey, M, (2018), *National Audit of Support for Veterans in the Criminal Justice System A report for the Cobseo Criminal Justice Cluster Group*. p.12

The Legion recommends that more work is carried out to ensure that there are veterans champions present throughout bodies in the criminal justice pathway, with tailored training, support and appropriate resourcing including dedicated funding streams.

Asking the Question

As with other themes in this consultation, one of the key findings of the Phillips' Review, was the lack of accurate data available on the numbers of veterans present in the criminal justice system through lack of consistent and reliable self reporting of veteran status. Phillips' recommended "that data as to the numbers of those who have served in the Armed Forces and find themselves either in custody or subject to intervention by the probation services should in future be routinely captured by the Ministry of Justice."¹¹⁸

Progress has been made in this area, notably through the question being added to the Basic Custody Screening Tool (BCST) and we are pleased to see the recent experimental statistical release on the numbers within the prison estate. As veteran offender rates continue to regularly be the focus of policy and public interest, accurate data is vital to ensure that pervasive and damaging myths are not allowed to propagate. **Therefore, we recommend that publication of these statistics continues past experimental status and they become a regular Government statistical release through which trends over time can be monitored.**

As has been mentioned elsewhere in our response to this consultation, the importance of asking the question and data capture is paramount to the provision of tailored and effective services. The Anglia Ruskin audit, and accompanying map of service provision, contains a wealth of information on the broad range of charitable and statutory support for veterans in the criminal justice system. However, to ensure that this support reaches those who are eligible, they first need to be identified. The Legion is not convinced that the question is still being asked routinely at multiple stages of the process. We are concerned that where the BCST information is being used, it may not be in an environment where a veteran feels able to, or sees the worth in, disclosing their status. It is our understanding that practice differs between prisons on when and where to ask the question. There is scope therefore for best practice on data capture to be shared within criminal justice system bodies. Veterans who fail to disclose Service through stigma or fear of reprisal, especially in Northern Ireland, may be comfortable revealing their veteran status in a peer to peer setting once in prison rather than to an official. It is vital that measures are put in place to ensure that this can then be recorded securely once that veteran has made themselves known.

It is also vital that asking the question happens throughout the criminal justice pathway and that data can be shared in order to ensure that interventions and support can be targeted appropriately. Entry into prisons is a significant universal point of data capture for those at that stage of the offender journey. However, there are examples of good practice happening within the country which are reliant on identification at police custody and subsequently in probation. Project Nova¹¹⁹ is one such example of this good practice, and it is reliant on the veterans being identified at an early stage. Once data is captured, the evaluation report carried out on Project Nova further makes the point that robust, quick and simple data sharing arrangements between the police and the provider are essential.¹²⁰

¹¹⁸ Stephen Phillips QC MP (2014)

¹¹⁹ For more information about project nova please visit: <https://www.rfea.org.uk/our-programmes-partnerships/project-nova/>

¹²⁰ Fossey, et al (2017), *A Pilot Study* p.7

The Legion reiterates the Phillips review recommendation that **data should be routinely captured within the criminal justice system and that this data is used to ensure that veterans and their families can access tailored support**. Further training of frontline staff within the statutory sector of the unique needs of the veteran community will be vital in ensuring that the question is asked in an appropriate and timely way at every stage of the criminal justice pathway. Lastly, we also believe that **further research should be carried out on the attitudes of veterans towards disclosing their Armed Forces background at all levels of the criminal justice system, including differences in willingness to disclose between police custody suites and prison settings**.

As mentioned above in this consultation response, the Legion is keen to draw attention further to the unique context of Northern Ireland. The cultural framework within which prisons operate in Northern Ireland may make veterans less likely to self-identify unless they are able to do so in a trusted peer-to-peer setting. Where veteran status is recorded, we are not aware of that information being collated centrally nor accessible by veteran sector organisations seeking to support the cohort. **The Legion would welcome a review of data collation practices once a veteran identifies as such in the criminal justice system in Northern Ireland.**

Prevention

Much of the above is targeted at improving services for those veterans who are already within the criminal justice system. Better targeted interventions predicated on robust data and training packages will help reduce reoffending rates. However, a reduction in the numbers of veterans who are in the criminal justice estate is reliant on much of the rest of the strategy themes. As mentioned above, there is little evidence establishing causal links between Service and criminal activity. The rates captured in datasets suggest that a history in Service reduced the likelihood to offend. Therefore, the underlying factors that may impact on the general population's offending behaviours are likely to be similar for this cohort.

Analysis of existing research carried out by Mclean and Beak for the National Policing Improvement Agency, highlights that protective factors to reduce offending include employment and marriage¹²¹. Therefore, we also reiterate again the importance of family support to be provided alongside support provided to the incarcerated veteran. Mclean and Beak also note alcohol dependency and low educational attainment as recognised factors that increase offending and recidivism rates. Interventions which address these factors are mentioned in other sections of our consultation response, including Key Theme Two, education and employment.

Specifically, and in line with previous recommendations by McManus et al, alcohol interventions and reductions in alcohol dependency within the Serving and veteran community should be central to efforts to reduce offending rates. Ministry of Defence research into Alcohol rates in Service released in 2017 showed that out of over 100,000 Service personnel surveyed - 61% scored 5 or more on the AUDIT-C scale, placing them at increased risk of, or already experiencing, alcohol related harm. The current practice of using NICE recommended brief alcohol interventions has been shown in recent research to not make a significant difference on drinking behaviour in military populations.^{122,123} More work is therefore needed to ensure that where comorbid factors that may result in an

¹²¹ Mclean, F, and Beak, K, (2012), *Factors associated with serious or persistent violent offending: Findings from a rapid evidence assessment*

¹²² Doherty, A, Mason, C, Fear, N, Rona, R, Greenberg, N, Goodwin, L, (2017) *Are brief alcohol interventions targeting alcohol use efficacious in military and veteran populations? A meta-analysis*

¹²³ Wigham, S, Bauer, A, Robalino, S, Fergusen, J, Burke, A, Newbury-Birch, D, (2017) *A systematic review of the effectiveness of alcohol brief interventions for the UK military personnel moving back to civilian life.*

increased likelihood of offending, such as low educational attainment, adverse childhood experience and high levels of alcohol abuse are present, these risk factors are addressed holistically both in Service and through transition via long term interventions.

The Legion recommends that the new holistic transition policy incorporates factors which have been found to increase likelihood of offending behaviours within its inclusion criteria for vulnerable and at-risk veterans, paying particular attention to those who have undertaken combat role and those who register high AUDIT-C scale alcohol dependency scores.

Lastly, we would like to emphasise the importance of the provision of appropriate support to veteran offenders on leaving the prison estate to prevent reoffending. There are many good practice examples of support in the probation service¹²⁴, however symptomatic of how one poor collaboration between services can fail a vulnerable veteran can be seen in the Legion's outreach team encountering cases where ex-Service personnel on release from prison are unable to find adequate accommodation when they leave and becoming hidden homeless. Should personnel be resettled in locations where they have no social or family support networks, a property is unsuitable for health reasons or hostel locations are away from social networks, in our experience veterans may then relocate to an area where they have an established network through sofa surfing or living in overcrowded accommodation with friends or family in an effort to try and gain some stability. It is vital therefore that, as discussed elsewhere in this consultation, any veteran who encounters statutory support is provided with a holistic pathway that addresses all their needs.

National Audit of Provision for Veterans in the Criminal Justice System map

The Legion is aware that following the National Audit of Provision for Veterans in the Criminal Justice System, by the Veterans and Families Institute (VFI) at Anglia Ruskin progress on recommendations for continuation of the mapping tool produced has stalled in significant areas. The VFI have informed us that Her Majesty's Prison and Probation Service Co-Financing Organisation (HMPPS CFO) have secured funding to host and maintain the legacy of the Map until 2023 and have committed to maintaining its on-going functionality. We welcome this commitment. However, the VFI recommended that HMPPS CFO host the site under a clearer URL, in order to gain greater online visibility and ease of access. yet, the Map remains on the HMPPS CFO website and its associated web address. **We believe that the map should be hosted on its own dedicated and promoted URL for ease of accessibility and use.**

We are also not clear as to whether HMPPS CFO have realised plans to increase access of the Map within prisons, to VICSOs and personnel who are serving a custodial sentence, by lifting online firewalls. We recommend that this plan is implemented fully.

Recommendations

- Further research is carried out not just into numbers, but into the demographic and need profile of the veteran population currently within the UK's criminal justice system.
- The Government publishes a five-year statement on progress against each of the recommendations in the Phillips review.

¹²⁴ Probation Institute (2016), *Profile of provision for armed forces veterans under probation supervision*

- Work is carried out to ensure that there are Armed Forces Champions present throughout bodies in the criminal justice pathway, with tailored training, support and appropriate resourcing including dedicated funding streams.
- Recent experimental statistics on veteran prison numbers continue past experimental status and they become a regular government statistical release through which trends over time can be monitored.
- Veteran status is routinely captured within the criminal justice system and that this data is used to ensure that veterans and their families can access tailored support.
- The Ministry of Justice commission research into attitudes of veterans towards disclosing their Armed Forces background at all levels of the criminal justice system, including differences in willingness to disclose between police custody suites and prison settings.
- The Legion would welcome a review of veteran status data collation practices in the criminal justice system in Northern Ireland.
- The Ministry of Defence's new holistic transition policy incorporates factors which have been found to increase likelihood of offending behaviours within its inclusion criteria for vulnerable and at-risk veterans, paying particular attention to those who have undertaken combat role and those who register high AUDIT-C scale alcohol dependency scores.
- Her Majesty's Prison and Probation Service Co-Financing Organisation host the National Audit of Provision for Veterans in the Criminal Justice System mapping tool on its own dedicated and promoted URL.
- Her Majesty's Prison and Probation Service Co-Financing implement fully their plan to increase access of the National Audit of Provision for Veterans in the Criminal Justice System mapping tool within prisons, to VICSOs and personnel who are serving a custodial sentence, by lifting online firewalls.

Appendix 1: Full list of recommendations

Introduction

- Amend the 2028 Outcome and Key Focus Areas to include reference to veterans' families.
- The Ministry of Defence maintain flexibility in the implementation plan of the Strategy for our Veterans to reflect new requirements upon government prompted by changing circumstances.
- The Government extend the consultation process to cover Crown Dependencies and overseas territories.
- The Ministry of Defence undertake research to explore how a veteran strategy may be able to benefit UK veterans living overseas.
- The Government produce a separate response to the consultation for Northern Ireland.
- The Government continue to define veteran as one day's service.

Collaboration between organisations

- The Government provide sustainable funding to meet the ongoing financial requirements of collaborative initiatives such as the Veterans Gateway and the Casework Management System.
- The Ministry of Defence and Defence Relationship Management encourage corporate signatories of the Covenant to make pledges that look beyond just their role as employers.
- The Ministry of Defence and Defence Relationship Management provide an enhanced package of practical support to corporate signatories of the Covenant.
- The Ministry of Defence review current Service verification procedures with an aim to learn best practice from other comparable sectors. This review should result in a simpler and more accessible Service verification process, which can be accessed securely by Service charities and the statutory sector.
- The Government explores the creation of an online Veterans UK account and accompanying app.
- The outcome of the Strategy consultation balance support provision by the charitable sector with consideration of what additional activity can be taken on by government.

Coordination of veterans' services

- Remove the caveat "*compared to the local population*" from the 2028 Strategy Outcome.
- The Government apply a test of sufficient funds and authority to the creation of any new government coordination structures.

- The Government review structures for central government support of veterans at the local level.
- The Ministry of Defence and the Ministry of Housing, Communities and Local Government monitor local authorities' implementation of the core covenant delivery infrastructure.
- An evaluation is carried out of existing local authority Covenant delivery posts.
- Local authority champions are provided with nationally shared performance targets and role responsibilities, potentially through a nationwide induction scheme and dedicated funding streams.
- Further research undertaken into Covenant delivery by public bodies other than local authorities.
- The Government retain the option of giving legal force to the Covenant, with a deadline of 2021 for a decision on whether this option is required.
- The Government keep existing co-ordinating functions within Northern Ireland under review and ensure appropriate evaluation takes place.

Data on the veteran community

- Central government, local government and statutory service providers introduce a standardised question for public bodies to ask in order to improve identification of members of the Armed Forces community and, in turn, improve signposting and awareness.
- All current benefit application forms are reviewed to assess the feasibility of the inclusion of a veteran status question.
- The Government, specifically the MHCLG investigate the feasibility of introducing a "tell me once" service for veterans that can enable data sharing on an individual between different tier authorities and statutory agencies.
- The new veteran status question for the 2021 census is included in the Census Order when put before parliament, and that parliament approves it.
- NISRA publish a recommendation to include a veteran question, as closely aligned to the NRS and ONS question as feasible, to provide a comparable UK wide assessment of need.
- The Government reconsider its decision to cease publication of the Annual Population Survey veteran data and commit to continuing to publish the data annually for the years 2018 onwards.
- The Government commission analysis of all cohorts of the UK's Birth Cohort Study to identify members of the Armed Forces community and enable longitudinal research of veteran life trajectories in comparison to other occupational backgrounds.
- Wider take up of the outcome measurement star methodology amongst those providing services to veterans and their families.

- The Government convenes a stakeholder working group to establish common metrics and demographics for data recording across the sector.
- The Ministry of Defence learn from good practice within the Housing sector, where the membership body Housemark provides a data warehousing service, with the view to facilitating a similar process in the veteran sector.
- The Ministry of Defence review current Service verification procedures with an aim to learn best practice from other comparable sectors. This review should result in a simpler and more accessible Service verification process which can be accessed securely by Service charities and the statutory sector.

Public perception and understanding

- All government departments conduct proactive and positive social media campaigns with content outlining measures being taken to support veterans or services already available to them, incorporating accurate and engaging stories and facts about the veteran community.
- The MOD respond more robustly to negative and inaccurate media stories on veterans through the provision of more substantive responses in the Defence in the News blog, drawing on research rather than solely providing short spokesperson quotes.
- Government, charities and Employer Recognition Scheme award winners make greater use of veteran ambassadors to provide a more positive and balanced portrayal of veterans.
- The MOD improve the Armed Forces Covenant microsite by including more facts, research, and inspirational veteran ambassador stories within the veteran's area of the site.
- The MOD put forward authoritative individuals, whether experts or military personnel, to provide counter arguments to misleading or inaccurate stories, and be more prepared to challenge unhelpful comparisons with US provision and outcomes.
- The Government encourage politicians and charities to use more balanced language in their debates and promotional material.

Recognition of veterans

- Government and wider society endeavour to respect the wishes of those veterans who do not wish to be defined by, or singled out because of, their veteran status, ensuring that veterans are able to opt-into measures intended to raise their profile.
- The Single Services and the Armed Forces make more routine use of Open House Days.
- Military units do more to offer their services and/or spare capacity on bases to their local host council or community interest groups.
- Military units hold military ceremonies, such as the presentation of medals and awards, in a civic setting rather than on base.

- The Single Services and Ministry of Defence should facilitate the wearing of military uniforms on specific occasions throughout the year.
- Appropriate incumbent Service Chiefs are more routinely used for public relations exercises.
- Armed Forces Day is extended to incorporate and celebrate both serving and ex-Service personnel.
- The Government roll out an integrated engagement campaign that seeks to better articulate the types of function and roles performed by military personnel, highlighting the number of Service personnel typically on deployment at any given time and the strategic context in which they operate.
- Politicians at all levels of government are routinely offered the opportunity to participate in an Armed Forces and Veterans Placement Scheme.
- Officers in Service are given the opportunity to undertake parliamentary or local authority orientation as part of their personal development plan.
- The Department for Education explore the insertion of a module on the Armed Forces and remembrance in the National Curriculum.
- The Department for Education provide funding for school trips to local and national military museums.
- Parliament and all individual MPs sign up to the Armed Forces Covenant.
- The Ministry of Defence assess the feasibility of establishing a veteran group life insurance plan.
- The Ministry of Defence increase the War Widows Funeral Payment to £4,800.
- War Widows' Pensions are exempted from statutory financial assessments for statutory support.
- The Ministry of Defence provide enhanced provision of education credits for bereaved spouses and children, to be used whenever they feel able to pursue new qualifications.
- Existing good practice on free travel for those in receipt of an MOD administered compensation scheme is shared with private and state transport operators to encourage additional areas to implement similar concessions.
- Local Remembrance parades receive national funding in order to ensure their future.
- A fully funded battlefield visit scheme is established for veterans, and widow(er)s, of recent conflicts, such as the Falklands and Balkans.
- The Government commit to permanently funding the maintenance of the national Armed Forces Memorial at the National Memorial Arboretum.

Community and relationships

- The incorporation of questions or measures for loneliness and social isolation into the remaining Tri-service annual surveys.
- The Government funds a robust research programme examining the prevalence and causes of loneliness and social isolation across the Armed Force Community.
- The Ministry of Defence monitor impact on loneliness and social isolation in the pilot of the Future Accommodation Model.
- Local and devolved governments adopt common definitions of loneliness and social isolation.
- Local authorities include loneliness and social isolation in their Joint Strategic Needs Assessment (JSNA) or equivalent, and that they consider how additional initiatives could be targeted at members of the Armed Forces community.
- The introduction of a module on social resilience for all serving personnel as part of resettlement provision, with a focus on loneliness and social isolation and preparation for transition out of the Forces.
- The Single Services incorporate specific questions about loneliness and social into the HARDFACTS Assessment and Monitoring Tools.
- The introduction of centrally funded relationship support for couples experiencing issues related to service both within Service and following transition.
- The Ministry of Defence and the Single Services are represented in Cross Government loneliness strategy campaigns.

Employment, education and skills

- The long-term sustainability of employment for veterans, post-2 years from discharge, is researched.
- The Government undertake a review of the educational support offered to corporate signatories of the covenant and the ability for employers already signed up to the Covenant to share positive experiences of employing veterans with those who have not signed up to it.
- The Ministry of Defence and Department for Work and Pensions work together to ensure the Access to Work scheme is more widely promoted to Wounded Injured and Sick Veterans, those who are about to be medically discharged and considering civilian employment and veterans accessing statutory support.
- The Department of Work and Pension ensure that conditionality policies are amended to provide flexibility for where conditionality may not be met due to circumstances attributable to veteran experience.
- Armed Forces recruits below the age of 18 should be subject to the same statutory minimum educational standards as they would do in the civilian education sector. This should include: A minimum of 280 guided learning hours per year towards accredited qualifications of an appropriate level, Support to take or retake GCSE's in English and Maths to achieve passes at grade equivalency of A*-C and for those who

already hold qualifications, support to Level 3 qualifications with transferable value to future civilian employment.

- The Department for Work and Pensions ensure 'veteran friendly' work coaches are available to veterans. These coaches are sufficiently trained to establish a veteran's interests and skill level so that they are able to find sustainable, fulfilling employment.
- The Ministry of Defence should recognise military spouses as individual agents in their own right and provide support and assistance to help military spouses into employment.
- The Department for Education extend Service Pupil Premium to pupils up to cover Service children in early years education and up the age of 18.
- The Department for Education amend school allocation policy guidance to extend Armed Forces provision to encompass recently transitioned personnel.

Finance and debt

- The Single Services increase the provision of life skills training into resettlement packages and increase prominence of financial capability training throughout Service.
- The Ministry of Defence promote MoneyForce more widely amongst the serving Armed Forces and their families, especially those starting out in their post-forces careers.
- The Ministry of Defence lead a multi-agency communication plan to warn Service families of the dangers of taking out Pay Day and other unregulated loans and continue to highlight the availability of alternative sources of finance such as an Armed Forces Credit Union.
- The Ministry of Defence commission research on problem gambling rates and behaviours in Service and implement a strategy to tackle identified issues.
- Interim arrangements are put in place until the full roll out of Universal Credit is achieved to amend the income related Employment Support Allowance means test to routinely disregard Armed Forces compensation payments.
- The Department of Work and Pensions disregard compensation payments from the Pension Credit means test.
- Arrangements are put in place to ensure that those who have a severe mental health condition as a result of Service dating prior to 2005 are able to access vital and appropriate mobility support equal to their physically injured veteran peers, potentially through access to War Pension mobility supplements or AFIP
- Indefinite Leave to Remain fees for Commonwealth Armed Forces Personnel and their dependents are waived with immediate effect
- National guidance issued on the disregard from means tests of Service Attributable Payments, and Service Invaliding Payments, in line with other compensation payments.

- Veterans UK, or an equivalent body, provide impartial pensions advice, or use the existing expertise at the Forces Pension Society but freely accessible to all.
- A new communication campaign run by the Ministry of Defence and Veterans UK encourages veterans unsure about their entitlement to come forward for advice, including those who are entitled to a Commissioned Officer's Supplement.
- The Government explore options to improve the finances of the pre AFPS 75 veteran cohort, especially those who were conscripted into National Service, via introduction of a similar scheme to the Military Spouses National Insurance Credits Scheme.
- The Ministry of Defence amend the regulations which cover Armed Forces Pension Scheme inheritance to grant the waiver received by Ft Lt McConnell to all claimants.
- The independent Medical Expert Group is provided with the ability to commission research where it identifies knowledge gaps which may prevent adequate compensation reaching injured veterans.
- There should be no time limits on claiming compensation, and in the short-term the Ministry of Defence suspend time limits on compensation claims whilst it undertakes research on barriers to uptake and subsequently implementing measures to reduce late claims.
- The Mercantile Marines Compensation Scheme 1964 is amended to provide compensation for mental as well as physical injury.

Health and wellbeing

- Roll out of the GP veterans accreditation scheme is expedited.
- A multi-stakeholder working group with representatives from the Armed Forces charity sector and patients is established to come to an agreed definition of Priority Treatment in a timely manner that has a genuine positive impact on the health needs of Veterans and fits with the future of the NHS. Output includes guidance to assist clinicians, particularly in determining service related conditions.
- The GP Accreditation Scheme sets a Key Performance Indicator target of increasing Read Code take up amongst the veteran community.
- NHS England and the MoD publish a timetable for completion of work to enable the transfer of clinical notes into the NHS as service personnel leave the Service.
- NHS England commit to publishing annual figures outlining the number of TILS referrals, assessments, and onward referrals.
- NHS England give consideration to ensure that there is no gap in support provision for those experiencing the most complex mental health issues, who may require specialist treatment but may not be able to access it via current service provision.
- The Ministry of Defence provide assurance that the commitment to accurately record veterans who take their own lives, suicides and open verdicts by coroners is underway.

- Further research is undertaken, and the results translated into Service provision, on the impact and treatment of moral injury on veterans.
- Moral Injury is considered in reference to Ministry of Defence compensation schemes, ensuring that claims reflect the impact of injury due to Service.
- There are clear access points and care pathways for Armed Forces spouses, partners and children, including families of current or former members of the Armed Forces.
- The Government secure investment for research into health and social care models that can improve recovery and quality of life for ill Gulf War veterans, communicate the results of similar research being undertaken in the US to Gulf War veterans here in the UK.
- The incorporation of questions or measures for loneliness and social isolation into the remaining Tri-service annual surveys.
- The Government funds a robust research programme examining the prevalence and causes of loneliness and social isolation across the Armed Force community.
- The Ministry of Defence monitor impact on loneliness and social isolation in the pilot of the Future Accommodation Model.
- Local and devolved governments adopt common definitions of loneliness and social isolation.
- Local authorities include loneliness and social isolation in their Joint Strategic Needs Assessment (JSNA) or equivalent, and that they consider how additional initiatives could be targeted at members of the Armed Forces community
- The introduction of a module on social resilience for all serving personnel as part of resettlement provision, with a focus on loneliness and social isolation and preparation for transition out of the Forces.
- The Single Services incorporate specific questions about loneliness and social into the HARDFACTS Assessment and Monitoring Tools.
- The introduction of centrally funded relationship support for couples experiencing issues related to service both within Service and following transition.
- Any funding settlement for the Care system in England must: take into account funded support and respite for carers; ensure decisions around adult social care and support are made at local level; provide minimum standards of care; acknowledge and fund pressures within the care provision sector; reflect the increasing complexity of medical and care needs; and continue to honour the principle that Service compensation should not be regarded as normal income or diminish this disregard in any way.
- Northern Ireland end a disadvantage veterans face compared to their Great Britain contemporaries by exempting compensation payments from social care financial assessments.

- National and local governments must ensure that local authorities look to the true cost of care provision when assessing a budget for meeting an individual's care needs and reflect this in personal budgets to avoid increasing top up fees falling onto those who need care most.
- Veterans are never forced to sell their own homes to pay for social care in their own lifetime. A new care and support funding system is flexible to allow schemes such as equity release or insurance schemes that allow protection of assets should an individual need social care.
- Mental health treatment in Northern Ireland is not subject to an inflexible session limit, leaving vulnerable veterans unable to access further support.

Making a home in civilian society

- Ministry of Housing, Communities and Local Government amend local connection exemption rules for veteran applicants to social housing by removing the five-year time limit.
- Local authorities improve the capture of data on rough sleeping veterans, possibly through the use of a system like London CHAIN across England.
- Local authorities use data gathered from the new H-CLIC recording system to assess demand on homelessness services from veterans.
- The Government explore methodologies for gathering accurate data in order to support veterans who are 'Hidden Homeless.'
- The Ministry of Housing, Communities and Local Government and the Ministry of Defence resource local authorities so that they can provide the training necessary to skill housing authority staff on the correct procedures and options open to veterans.
- Local authorities ensure that all members of the public approaching government services are asked the question of whether they have previously served in the Armed Forces.
- The Ministry of Housing, Communities and Local Government and local authorities extend the provisions in housing services that are granted to veterans to their families and also to divorced and separated spouses and partners.
- The Housing Executive in Northern Ireland introduce flexibility and discretion to their allocation policies to allow veterans to refuse areas that may perceive as unsafe for them or their family, without it impacting on eligibility for further support.

Veterans and the law

- Further research is carried out not just into numbers, but into the demographic and need profile of the veteran population currently within the UK's criminal justice system.
- The Government publishes a five-year statement on progress against each of the recommendations in the Phillips review.

- Work is carried out to ensure that there are Armed Forces Champions present throughout bodies in the criminal justice pathway, with tailored training, support and appropriate resourcing including dedicated funding streams.
- Recent experimental statistics on veteran prison numbers continue past experimental status and they become a regular government statistical release through which trends over time can be monitored.
- Veteran status is routinely captured within the criminal justice system and that this data is used to ensure that veterans and their families can access tailored support.
- The Ministry of Justice commission research into attitudes of veterans towards disclosing their Armed Forces background at all levels of the criminal justice system, including differences in willingness to disclose between police custody suites and prison settings.
- The Legion would welcome a review of veteran status data collation practices in the criminal justice system in Northern Ireland.
- The Ministry of Defence's new holistic transition policy incorporates factors which have been found to increase likelihood of offending behaviours within its inclusion criteria for vulnerable and at-risk veterans, paying particular attention to those who have undertaken combat role and those who register high AUDIT-C scale alcohol dependency scores.
- Her Majesty's Prison and Probation Service Co-Financing Organisation host the National Audit of Provision for Veterans in the Criminal Justice System mapping tool on its own dedicated and promoted URL.
- Her Majesty's Prison and Probation Service Co-Financing implement fully their plan to increase access of the National Audit of Provision for Veterans in the Criminal Justice System mapping tool within prisons, to Veterans in Custody Support Officers and personnel who are serving a custodial sentence, by lifting online firewalls.

Appendix 2: Poppyscotland comments

The Royal British Legion operates primarily in England, Wales, and Northern Ireland with representation and welfare support in some areas overseas. In Scotland, welfare support for the Service community is carried out by our sister charity Poppyscotland. The following comments represent Poppyscotland's comments on the UK Government Veterans Strategy.

The comments and observations below are a reflection of the views of Poppyscotland staff and those of participants attending our 4 focus groups. Two focus groups were hosted by our Welfare Centres in Inverness and Kilmarnock and 2 in Edinburgh; one based on participants and staff from our 'Employable' programme and one based on those who participate in our Grants Programme. These groups attracted over 30 veterans and were also attended by the Scottish Government's Defence Policy Unit Staff.

Comments, organised by themes are:

Delivery and Accountability

We support the aim of adopting a nation specific delivery framework underpinning a wider strategy, but note that to be successful, it will require clear lines of funding, resources and accountability. We would welcome the opportunity to be involved in the development of this framework.

The UK and Scottish Governments both have a clear role to play in support of our Armed Forces community. In order to provide the best support and make a difference for our beneficiaries, there has to be collaboration, co-ordination and where appropriate joint responsibility between and by both governments. We would urge both to work together to ensure that delivery is optimised across all portfolio areas. The establishment of the Ministerial Covenant and Veterans Board (of which the Scottish Veterans' Minister is a member) is beginning to make progress on this and we would like to see it further strengthened.

The Needs of Veterans and Families

In the majority of cases, it is recognised that the needs of veterans are similar to those of the rest of society. Veterans involved in the Ayrshire Focus Group felt that, in principle, veterans should not be treated any differently from civilians when accessing and receiving support. However, it was also universally agreed that where there was a clear disadvantage (Injury, disability, dislocation etc.) a higher priority ought to apply. However, whilst in some cases attention needs to be paid to the pathways available for veterans and their families to access relevant services, the service provision should simply be available equably.

Greater Understanding and Respect

Ayrshire and Inverness Focus Group participants supported initiatives such as the issue and use of the Veterans ID Card announced by the UK Government in September 2018, and other initiatives such as North Ayrshire Council's announcement that it would give priority to veterans on the housing needs list. Both groups also felt that there needed to be greater awareness and education to address misconceptions about the Armed Forces Community; in particular, to educate support professionals and the wider public about what life is like as a member of the Armed Forces Community.

Poppyscotland's Employ-Able Focus Group highlighted some negative experiences, including examples where there has been a lack of understanding of veterans and the specific issues they face. This included accessing employment support and social security benefits. For example, the translation of military to civilian skills and the consideration of some military service benefits when determining income. Again, addressing these barriers through cultural change and greater education were cited as potential remedies.

Another topic that arose at both Poppyscotland's Ayrshire and Inverness Focus Groups was reaching a better balance between supporting the living and remembering the fallen. Whilst Remembrance has its rightful place in society, it was felt that there could be greater prominence given to Armed Forces Day.

Statutory Support for Veterans

The Armed Forces Covenant provides the context for the nation, including statutory agencies and others to pledge their support for the Armed Forces community. The Scottish Veterans Commissioner has published various reports and recommendations to improve statutory support for veterans. In this context, we welcome the Scottish Government's publication 'Renewing Our Commitments' and subsequent Annual Reports to Parliament which look to address the issues raised. These publications list the range of support on offer to veterans in employment, housing, health, and transition.

Nevertheless, participants in Poppyscotland's Focus Groups in Ayrshire, Inverness and Edinburgh still felt that statutory support for veterans had to be further strengthened particularly in the areas of health, housing, and social security. Participants in the focus groups felt that the various reports and strategies were setting the right tone and ambitions, but were slow in achieving meaningful progress.

Participants also felt that both UK and Scottish Governments should continue engagement with veterans when identifying and providing statutory services. This is something which the military service sector could look to support. While the Careers Transitions Partnership (CTP) has made noticeable strides over the years, the UK Government could do more in fulfilling its responsibility towards the process and practicalities involved for transitioning veterans. This could include better teaching of life skills and a personalised, supportive environment throughout the transition process. Focus Groups in Ayrshire, Inverness and Edinburgh noted that life for veterans leaving today has much improved since those that left in the 1970's and 1980's. However, it was still felt that the Ministry of Defence was good at turning civilians into soldiers but not returning soldiers back into civilians again.

Data Gathering

The lack of full and useful data regarding veterans and our Armed Forces community has been a constant challenge. In this regard, support from UK and Scottish Governments, the Office of National Statistics (ONS) and the National Records Scotland (NRS) for RBL's 'Count Them In' campaign is most welcome.

From our engagement with statutory agencies, practitioners, and frontline staff in the NHS, education, social security, local government, and elsewhere, there is still much work to be done to record and report data concerning our Armed Forces community. As a recent example, discussion with the Royal Caledonian Education Trust (RCET) has highlighted gaps in data regarding service children and families. Without accurate data, statutory agencies, commercial operatives, and third sector organisations cannot effectively design services, support initiatives, set effective strategies or devise service delivery plans.

To further improve data, systems and processes need to be reviewed. These systems need not to just record and report data but also allow the data to be analysed and interpreted with other published data – some of which may belong to other agencies, sectors, and organisations. Although GDPR and Data Protection will be challenging, success would allow national and local governments to work with agencies and service delivery partners to put in place the most appropriate and necessary support for our Armed Forces Community.

Collaboration

The UK Government's consultation process asks if there are any good examples of collaboration and partnership working. It is undoubtedly the case that some of the most productive programmes are based on these 2 principles. As examples from our own experience:

- The Unforgotten Forces Consortium. A consortium of 15 military and civilian organisations providing holistic and complementary services to older veterans in need. The Unique Selling Point for this partnership is the partnership arrangement allowing smooth and frictionless inter referrals. It is also a model for using private sector skills and involvement to optimise service design.
- Employable. An employment programme for those who have mental health issues preventing a return to work. It is an example of using, modifying and adapting existing skill sets to create a veteran's programme. The Scottish Association for Mental Health (SAMH) delivers our Service.
- ASAP. Similarly, we also work with Citizens Advice Scotland to deliver the Armed Services Advice Project (ASAP) which operates from bureaux across Scotland. Following this approach allows for the integration of veteran specific support with tailored support services for mental health and advice.
- Welfare Support Service. With support from the Royal British Legion, we are about to expand our welfare provision, introducing this new service which will have national reach, fully equipped to coordinate support to the most vulnerable of veterans who have multiple and complex needs. The service will allow greater coordination of support to our beneficiaries and complement the work of others, in particular SSAFA and the Armed Services Advice Project (ASAP).

Welfare Support

The UK Government's greatest impact in delivering support to veterans in Scotland is through social security. The focus group in Edinburgh (with service users of our Employ-Able service) focused on the themes of employment, finance and debt, part of which covered the persistent issues facing people (not just veterans) regarding universal credit. Participants particularly reported difficulties with delays to payments whilst transitioning to Universal Credit. Veterans in this situation asked for a greater focus to be placed on this part of the welfare / social security journey.

The types and quality of support provided by job centres was also raised in the group discussion. It was felt that job centres need to explain better what they can and cannot do and what they can and cannot offer. Travel expenses to and from interviews being an example. One veteran said that rather than miss an interview opportunity, he had walked 40 miles to attend an interview. Others cited examples where job centre advisors had not completed a client's paperwork correctly, leading to sanctions being imposed with severe consequences for the individual. In one case an individual had to resort to a loan which led

to debt and a bad credit rating which then further hampered efforts to secure employment. The theme of low income was also raised in the Employ-Able focus group. Income levels were considered too low and the application of benefits inconsistent. Their view was that UK Government needs to urgently look at the shortcoming of Universal Credit, the types and quality of service provided at job centres, and the basic incomes of veterans when finalising the strategy.

The Strategy should also consider and take account of the changing nature of our Armed Forces Community – the result of a changing demographic, reduced size and profile of our Armed Forces and societal changes. In this context, it should acknowledge and support the complementary role that commercial and third sector organisations play in supporting veterans, particularly those with complex needs. Successfully dealing with those in need and particularly the most vulnerable of our beneficiaries, requires a holistic approach – evidenced by ASAP analysis, which reveals that presenting issues are usually masking between 4 and 6 contributory or aggravating issues.

Appendix 3: Legion Social Isolation and Loneliness activity

The Legion undertakes a number of streams of work that address loneliness and social isolation. To give context to key theme 1 and share practice to inform the strategy, we have outlined a snapshot of our activity below.

Research

The publication of our report into this issue has been a positive step, creating a base of evidence upon which we can take action, as well as something that other organisations can use. We have begun using this research to engage with relevant organisations in order to implement the recommendations.

Community Support Scheme

We have an established network of Branches in England, Wales & Northern Ireland involved in our Branch Community Support (BCS) Scheme, providing a sense of comradeship and creating openings for wider engagement. Recognising the sheer scale of those experiencing social Isolation or loneliness in the Armed Forces, this scheme offers services to support those identified as lonely or isolated and provide a sense of belonging. Key provision focusses on the delivery of:

Telephone Buddies

- Almost 400 Branches are able to provide support on the phone through our Telephone Buddy Service. This gives people who are feeling isolated the opportunity to reach out, talk to someone about what they are going through and find out about ways they can get involved in events and feel part of their local community. Between January and March 2018, we supported nearly 1,300 people through this service.

Home and Hospital Visits

- Many of our Branches also reach out to people who have difficulty getting out and about to meet others, or who have no one to visit them during a stay in hospital. Branches are able to offer home and hospital visits to those who may be feeling isolated in some way. It gives them a chance to talk with someone who may understand what they're going through. Nearly 700 people were helped between January and March 2018.

Care Homes

Our six care homes offer a number of ways to help older people and their carers feel more connected with the communities around them. These include dementia cafés or clubs, which give people living with dementia, a chance to socialise, participate in activities and build their confidence. We also offer social groups to support carers and organise events so that residents are able to make links with the local community.

Breaks and Holidays

The Legion offers vacations, family holidays and adventure breaks to people who may feel isolated after experiencing life-changing events such as illness or bereavement. Stays in one of our four Break Centres incorporate day trips, quiz nights, bingo and live music, as well as counselling and supported therapy sessions.

Pop In Centres

At 16 locations across the UK, we offer a walk-in service for people who want to chat or learn about services and support in their local community. We work closely with other organisations such as Combat Stress, Walking with the Wounded and Age UK

to help people make links with others in their area and get involved with events and other activities. Each centre offers a welcoming space for Service personnel, veterans and their families to get practical help and advice.

Financial advice and support

Sometimes, social isolation can be exacerbated by financial problems, including getting into debt. We offer benefits, debt and money advice for those experiencing financial difficulties, to help reduce their stress and anxiety and help smooth the transition to civilian life. We also offer grants to pay for essentials such as mobility items or hearing equipment, to give people the confidence to get out into their community and communicate better with the people around them.

Support for carers

We can provide specialist mental health nurses to support carers of people living with dementia. These Admiral Nurses provide practical, emotional and psychological help to give family units healthy ways to cope, from diagnosis to the advanced stages of the disease. As a result, carers will feel less isolated and more connected to those who can give them help, as well as more able to provide a positive, caring environment for their loved one.

Help to live independently

Through our welfare delivery services, we provide information and support to help people live independently. For example, our Independent Living Advice service specialises in supporting people with disabilities or long-term conditions to live independent, healthy and happy lives. This includes providing advice on local transport, events, social groups, fitness activities and support services, so people feel encouraged to go out. We also offer a Handy Vans service to older people and those with a disability to help with home adaptations and simple home repairs to reduce the barriers that stop people getting out and about.

Signposting/Social Prescribing

As evidenced in our focus groups which have been carried out across the country, loneliness and social isolation is something the Legion addresses through our casework on a daily basis. If loneliness or social isolation is identified, the caseworker will refer the beneficiary to a service. This might be either one provided by the Legion, such as our BCS service, or a service provided externally such as a veterans breakfast club or by Age UK, depending on what is on offer in the area. Some beneficiaries simply need encouragement and support to leave the house and engage with society. Some are also 'prescribed' physical activity, where appropriate, to encourage better health behaviours and improve mood.