



House of Commons  
Defence Committee

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# Armed Forces Covenant Annual Report 2018

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**Eighteenth Report of Session 2017–19**

*Report, together with formal minutes  
relating to the report*

*Ordered by the House of Commons  
to be printed 9 September 2019*

## The Defence Committee

The Defence Committee is appointed by the House of Commons to examine the expenditure, administration, and policy of the Ministry of Defence and its associated public bodies.

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## Summary

The principles of the Armed Forces Covenant are enshrined in law. Therefore, it is the responsibility of the whole of Government to ensure that they are being successfully communicated and implemented. This cannot be done by the Ministry of Defence (MoD) alone. We welcome the establishment of the Office for Veterans' Affairs and its shared responsibility between MoD and the Cabinet Office. We look forward to more details explaining the remit and function of the Office within the broader Covenant governance structure.

The full participation of the devolved administrations, especially through the Veterans Board, is essential in ensuring UK wide implementation of the Covenant. We call on the Government to grant full membership to Scotland and Wales immediately and extend this to Northern Ireland once a Government has been established.

We are concerned with the ongoing challenges faced by Commonwealth personnel who would like to bring their family with them to the UK. We recognise that this is a Home Office policy lead, but we would like to see the MoD improve its communication strategy with potential and serving Commonwealth personnel and continue to engage with the Home Office on this issue.

We acknowledge the work being done by the MoD in coordination with the Department for Education in supporting Service children. However, the causal relationship between the mobility of Service life and the effect on educational attainment needs to be explored further. Families are still reporting concerns over school admissions and research suggests that service children are less likely to go to university than the general population. These disadvantages must be understood and addressed as a Covenant priority.

It is disappointing that we must once again highlight our concern regarding the poor performance and serious challenges in respect of accommodation which continues to be the most frequently reported concern to the Service Families Federations. The MoD must learn lessons from the poor record of satisfaction with repair and maintenance for Service accommodation to ensure that future contracts have a customer-focused approach and that there is more active management of the contract. The MoD must put urgent plans in place to improve the condition of Single Living Accommodation (SLA). We will be asking the Comptroller and Auditor General to examine the provision of SLA.

The Veterans Gateway has developed into an essential hub of advice and support for veterans and their families. However, we note that long term financial provision has not been confirmed to keep the Gateway operational. A consultation between the MoD and the Service charities sector should take place to explore potential funding options for the future.

It is a matter of deep concern that little progress has been made in the reinstatement of War Widows' Pension to a cohort who remarried or cohabitated between 1973 and 2005. The new Secretary of State for Defence must press this issue and engage urgently with the Treasury to rectify this injustice.

Our report also considers other specific issues in respect of measuring Covenant delivery: healthcare, through-life support, the Covenant in Business and the Community Covenant.

We enthusiastically support the Covenant. Our Report is intended to be a constructive contribution to its delivery, and to the achievement of its goal: that Service personnel, Veterans and the wider Armed Forces community should suffer no disadvantage as a result of pursuing or supporting a career in the Armed Forces.

# 1 Introduction

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## Armed Forces Covenant

1. The Armed Forces Covenant was first published by the then coalition Government in May 2011.<sup>1</sup> At that time it was described by Rt Hon Dr Liam Fox MP, the then Secretary of State for Defence as:

The expression of the moral obligation the Government and the Nation owe to those who serve or have served in our Armed Forces and to their families.<sup>2</sup>

2. The Covenant defined the extent of the Armed Forces community and set out fifteen thematic areas within which support to that community should be provided (including terms and conditions of service (TACOS), healthcare, education, housing, benefits/tax, family life and transition). It further sought to identify the organisations and institutions which would be required to provide that support, and to articulate the obligations which underpin the Covenant. Guidance was published alongside the Covenant to set out initial practical measures, identified by the Government, to aid its implementation.<sup>3</sup>

3. The Armed Forces Act 2011 does not create legally enforceable rights for Service personnel,<sup>4</sup> but it does require the Secretary of State to lay an Annual Report before Parliament on the implementation of the Covenant.<sup>5</sup> An interim Annual Report was published in December 2011.<sup>6</sup> The first Covenant Annual Report was published in 2012.<sup>7</sup> The 2018 Annual Report, published in November 2018, is the seventh full report in the series.<sup>8</sup>

4. The 2011 Act also describes the two central principles of the Covenant to which the Secretary of State is required to have particular regard in the preparation of the Annual Report:

- the principle that it is desirable to remove disadvantages arising for Service people from membership, or former membership, of the Armed Forces; and
- the principle that special provision for Service people may be justified by the effects on such people of membership, or former membership, of the Armed Forces.<sup>9</sup>

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1 Ministry of Defence, [The Armed Forces Covenant](#), 16 May 2011

2 Ministry of Defence, [The Armed Forces Covenant: Today and Tomorrow](#), 16 May 2011, Foreword

3 Ministry of Defence, [The Armed Forces Covenant: Today and Tomorrow](#), 16 May 2011

4 House of Commons Library, [Armed Forces Covenant](#), 21 November 2018, p 2

5 Armed Forces Act 2011 (ch18), [section 2](#)

6 Ministry of Defence, [Armed Forces Covenant Interim Report \(2011\)](#), 1 November 2011

7 Ministry of Defence, [Armed Forces Covenant Report 2012](#), 5 December 2012

8 Ministry of Defence, [Armed Forces Covenant Report 2018](#), 21 November 2018

9 Armed Forces Act 2011 (ch 18), [section 2](#)

5. The 2018 Annual Report, like previous editions, contains a section of unedited observations from the External Members of the Covenant Reference Group (CRG).<sup>10</sup> The CRG brings together representatives of Government Departments and external organisations, including the Confederation of Service Charities (COBSEO), the Royal British Legion and the single Service Families Federations.<sup>11</sup>

## Our inquiry

6. On 16 January 2019, we launched our inquiry into the *Armed Forces Covenant Annual Report 2018*. Our call for evidence asked for submissions on the following points:

- Which of the main challenges faced by Service personnel, veterans and their families should be addressed within the framework of the Armed Forces Covenant?
- Is the Armed Forces Covenant being implemented fully across the range of issues it covers? If not, why?
- What more can be done to ensure that the initiatives of the Covenant are sustainable, cost effective and provide maximum impact to the intended beneficiaries?

7. We held two oral evidence sessions, the first with the Service Families Federations and Service Charities who are members of the External Reference Group. The final session was with the then Minister with responsibility for the Armed Force Covenant, Rt Hon Tobias Ellwood MP, Parliamentary Under-Secretary of State for Defence, and Mr James Greenrod, Interim Head, Service Personnel Support at the Ministry of Defence (MoD). We received a total of 22 written evidence submissions. We are grateful to everyone who has offered their time and expertise to assist us in our work.

8. The Covenant covers a wide range of matters and responsibility for implementation and delivery falls across Government Departments, the devolved administrations, local authorities and other bodies such as charities. Our report does not seek to cover all the areas of concern expressed about the Covenant, but focuses on the Covenant governance structure, the establishment of the Office for Veterans' Affairs, the Armed Forces Covenant Fund Trust, the data available and metrics used to measure Covenant delivery, family life, education, healthcare, accommodation, through-life support and the Covenant in relation to business and local communities.

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10 Ministry of Defence, [Armed Forces Covenant Report 2018](#), 21 November 2018, pp 17-24

11 A list of Covenant Reference Group Members is set out in HL Deb, 20 May 2013, [col 29WA](#)



## 2 Governance and metrics

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### Introduction

9. The 2017 Covenant Annual Report announced the creation of the Ministerial Covenant and Veterans Board (known as the Veterans Board), with the first meeting taking place in October 2017.<sup>12</sup> The Veterans Board meets every six months and is co-chaired by the Secretary of State for Defence, the Rt Hon Ben Wallace MP, and the Minister for the Cabinet Office the Rt Hon Oliver Dowden CBE MP.<sup>13</sup> It provides coordination of, and oversight for, public-sector service provision for veterans with the aim of delivering Covenant commitments across all Government departments.<sup>14</sup> It also has representation from the devolved administrations in attendance in the form of the lead Minister with responsibility for Covenant and Veterans issues and the Northern Ireland Office.<sup>15</sup>

10. The Veterans Board forms part of a wider structure of governance around the Covenant that includes the Covenant Reference Group, External Partners Meeting, Service Charities Partnership Board and the Ministerial Families Forum.<sup>16</sup>

### Office for Veterans' Affairs

11. On 29 July 2019, the Prime Minister, Rt Hon Boris Johnson MP, announced the creation of an Office for Veterans' Affairs, "to provide lifelong support to military personnel".<sup>17</sup> The Office will be located inside the Cabinet Office and will be jointly overseen by the Minister for the Cabinet Office, the Rt Hon Oliver Dowden CBE MP, and the Minister for Defence People and Veterans, Johnny Mercer MP. The Office will work "with departments to coordinate and drive government policy on veterans' welfare, spanning mental and physical health, education and employment".<sup>18</sup> Both Ministers are scheduled to give a progress report to the Prime Minister by 30 September 2019.

12. On 2 September 2019, the Government announced a £5 million funding boost for the Office for Veterans' Affairs as part of the Governments 2019 Spending Round. The money will be used to "fund additional staff and resources, so that the newly-established Office for Veterans' Affairs (OVA) can drive cross-Whitehall action to support veterans' welfare".<sup>19</sup>

**13. We welcome the establishment of the Office for Veterans' Affairs and the shared responsibility between MoD and the Cabinet Office. We are, however, keen to see a balance in the implementation of the Covenant between the needs of veterans and those of serving personnel. It is important that the Office makes a real difference and does not add another layer of bureaucracy to the delivery of the Covenant. *In response to our report, the Government should set out how this Office will operate across MoD and the Cabinet Office, including the role of the Office within the broader Covenant***

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12 Ministry of Defence, press release, [3 October 2017](#)

13 Ministry of Defence, press release, [29 July 2019](#)

14 Ministry of Defence, [The Strategy for our Veterans](#), Cm 9726, November 2018, p 12

15 Q113 [Mr Ellwood]

16 Defence Committee, Eleventh Special Report of Session 2017–19, [Armed Forces Covenant Annual Report 2017: Government Response to the Committee's Ninth Report of Session 2017–2019](#), HC 1571, p 10

17 Ministry of Defence, press release, [29 July 2019](#)

18 Ministry of Defence, press release, [29 July 2019](#)

19 Ministry of Defence, press release, [2 September 2019](#)

*governance structure, the role of each Minister, the long-term vision for the Office, the funding that will be made available to it, and the approach it will take to ensure a coordinated and consistent level of service is provided across Whitehall to veterans.*

## Engagement with the devolved administrations

14. Representatives from the devolved administrations are invited to attend meetings of the Veterans Board, but they are not full members. In oral evidence, James Greenrod, Interim Head, Service Personnel Support at the Ministry of Defence (MoD) suggested that the collapse of the Executive in Northern Ireland had “led to difficulties formalising that position to date”.<sup>20</sup> He added, however, that “It is absolutely the aspiration that we will be able to formalise that position”.

15. This situation was presented as a “technical issue”,<sup>21</sup> which did not adversely affect the working relationship with the devolved administrations. However, it is not clear to us why the situation in Northern Ireland precludes a formal agreement with the Scottish and Welsh devolved administrations.

16. There are also concerns that Northern Ireland continues to be represented by the Northern Ireland Office at Veterans Board meetings, when the issues discussed fall outside of its remit.<sup>22</sup> The Northern Ireland Civil Service has operational responsibility for the issues discussed at the Veterans Board, but James Greenrod told us that, despite a standing invitation, the Head of the Northern Ireland Civil Service, David Sterling, had chosen not to attend or to send a representative in his place.<sup>23</sup> The Scottish and Welsh Governments have lead Ministers in attendance alongside the Secretary of State for Wales and the Secretary of State for Scotland.

17. We wrote to Mr Sterling to find out whether he planned to attend the Veterans Board.<sup>24</sup> He replied that the Covenant had “not been adopted by the Northern Ireland Executive” and that at the time of the collapse of the last Executive, “there was no agreement on participation by either Executive Ministers or officials in forums associated with the Covenant”. He concluded that until there was an agreed position on participation, he would not be attending or sending a representative.

18. In response we referred to guidance on the Northern Ireland (Executive Formation and Exercise of Functions) Act 2018, which allows decision-making by a senior officer of a Northern Ireland Department in the absence of Ministers, if it is in the public interest to do so.<sup>25</sup> In his reply Mr Sterling argued that the priorities and commitments of former Executive Ministers should be followed unless there were an “exceptional circumstance”, as laid out in the guidance. He did not believe that this was an “exceptional circumstance”, but did recognise our position that the principles of the Covenant are in the UK public interest. He added:

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20 Q109 [Mr Greenrod]

21 Q111 [Mr Ellwood]

22 Qq113-117 [Gavin Robinson]

23 Qq115-117 [Mr Greenrod]

24 Correspondence with Northern Ireland Civil Service ([CAR0023](#))

25 Correspondence with Northern Ireland Civil Service ([CAR0023](#))

... I take this opportunity to re-affirm that we will of course continue to provide factual input to UK Government departments on matters relevant to the Armed Forces Covenant. There are also liaison arrangements in place in areas such as healthcare, education and housing.

19. Most recently, the Northern Ireland (Executive Formation etc) Act 2019 imposed a duty on the Secretary of State to publish an initial report on “progress made towards preparing legislation confirming the application of the Armed Forces Covenant in the provision of public services in Northern Ireland”.<sup>26</sup> The report was published on 4 September 2019.<sup>27</sup>

20. **We are concerned that the collapse of the Executive in Northern Ireland has impeded full engagement with, and implementation of, Covenant principles within Northern Ireland, thus creating a disparity with other parts of the UK. We welcome the duty placed on the Secretary of State to report on the progress of preparing legislation confirming the application of the Covenant in the provision of public services in Northern Ireland. *The Government should also consider amending the guidance provided by the Northern Ireland Office to the Northern Ireland Civil Service, under the Northern Ireland (Executive Formation and Exercise of Functions) Act 2018, to ensure that, in the absence of a devolved Executive in Northern Ireland, a representative from the Northern Ireland Civil Service attends meetings of the Veterans Board.***

21. **We are disappointed that the situation in Northern Ireland has delayed full membership on the Veterans Board for the Scottish and Welsh devolved administrations. We note that the MoD believes this has not affected their working relationship with the devolved administrations, but we are concerned about the message this sends. *The MoD should give full membership to the Scottish and Welsh Governments immediately. It should also explain its reasoning for withholding full membership to date, which should include any negative implications of granting full membership that have been identified.***

## Armed Forces Covenant Fund Trust and the involvement of charities

22. In April 2018, the £10 million per annum Covenant Fund was moved from the MoD to become an independent trust called the Armed Forces Covenant Fund Trust, following a decision that the Fund should be independent.<sup>28</sup> In oral evidence, General (Retd) Sir John McColl, Chairman of COBSEO, said he felt that the transition to the Covenant Fund Trust had gone “pretty smoothly”.<sup>29</sup>

23. The Covenant Fund has four broad funding themes:

- Removing barriers to family life;
- Extra support after service for those that need help;

26 Northern Ireland (Executive Formation etc) Act 2019 (ch22), [section 15](#)

27 Northern Ireland Office, [Report pursuant to section 3\(15\) of the Northern Ireland \(Executive Formation etc\) Act 2019 - the Armed Forces Covenant](#), 4 September 2019

28 Armed Forces Covenant Fund Trust, [Our History](#), website accessed 28 June 2019

29 Q55 [Sir John McColl]

- Measures to integrate military and civilian communities and allow the armed forces community to participate as citizens; and
- Non-core healthcare services for veterans.<sup>30</sup>

24. The Service charities are now represented on the Covenant Fund Trust as trustees. The Chair of COBSEO is a permanent trustee and the Service Families Federations occupy the position of trustee on a rotational basis every two years.<sup>31</sup> The seat is currently held by the Naval Families Federation. In oral evidence, Anna Wright, Chief Executive of the Naval Families Federation said that as a trustee they could add value by seeing what type of bids come in, what they aim to do and how credible they are.<sup>32</sup>

25. Written evidence from Northumbria and Chester University suggested more consideration should be given to the timings of announcements for major projects. They argue that there seems to be a yearly cycle of major calls which are announced over major holiday periods, “We would argue that this impacts greatly on quality, as large institutions will struggle to have access to the correct resources during these holiday periods”.<sup>33</sup> In response, James Greenrod said that the timetable for calls is driven by “a number of conflicting priorities” and that “we can certainly have another look at that”.<sup>34</sup>

26. In our report on the 2017 Covenant Annual Report we expressed concern over the costs of setting up and sustaining the new Fund which required a new IT system and new premises.<sup>35</sup> We sought reassurance that safeguards were in place to ensure the smallest possible proportion of the £10 million allocated to the Fund was used for this purpose. In its response to our report the MoD confirmed that there was a limit of £500,000 per annum on running costs linked to the grant-in-aid funding agreement which cannot be exceeded without formal consent from both MoD and the Treasury.<sup>36</sup> In oral evidence, James Greenrod, MoD, confirmed that they are operating within the cap and this remains their intention for the future. However, he added:

There are ongoing conversations as to whether or not, beyond the core £10 million a year, it is appropriate for other funds to be channelled through the trust fund. Unless and until those conversations reach a conclusion, the trust fund is committed to operating within the 5% cap that you mentioned.<sup>37</sup>

27. As well as managing the £10 million per annum to support the Armed Forces community the Covenant Fund Trust also manages another £10 million allocated by the Chancellor in the 2018 Autumn Budget to support Veterans’ Mental Health and Wellbeing needs.<sup>38</sup>

**28. We were pleased to hear the positive feedback from Service charities regarding the transition to the Covenant Fund Trust. We welcome the Fund’s new independent**

30 Armed Forces Covenant Fund Trust, [About Us](#), website accessed 28 June 2019

31 Q9 [Anna Wright] and Q55 [Sir John McColl]

32 Q9 [Anna Wright]

33 Northumbria and Chester University ([CAR0001](#))

34 Q153 [Mr Greenrod]

35 Defence Committee, Ninth Report of Session 2017–19, [Armed Forces Covenant Annual Report 2017](#), HC 707, para 73

36 Defence Committee, Eleventh Special Report of Session 2017–19, [Armed Forces Covenant Annual Report 2017: Government Response to the Committee’s Ninth Report of Session 2017–2019](#), HC 1571, p13

37 Q152 [Mr Greenrod]

38 Armed Forces Covenant Fund Trust, [Veterans Mental Health and Wellbeing Fund](#), website accessed 29 June 2019

status, the involvement of representatives from the Service charities as trustees for the Fund and the additional funding for Veterans' Mental Health and Wellbeing needs. However, with the introduction of additional funding beyond the core £10 million fund, we are concerned that the appropriate safeguards may not be in place to ensure that operational costs are kept to a minimum.

*29. In response to our report, the MoD should provide details of any other funds it expects to channel through the Covenant Fund Trust and the safeguards being put in place to ensure that running costs are kept to a minimum. This should include any planned increases and how the cost will be shared amongst the funds.*

## Measuring Covenant delivery

30. When the Veterans Board was established its top priority was improving the way Covenant delivery was measured.<sup>39</sup> The 2018 Covenant Report saw an increase in metrics for healthcare, education and accommodation.

31. General McColl of COBSEO told us that the metrics used in the 2018 Annual Report reflected a national picture of Covenant delivery rather than showing disparities at the local level.<sup>40</sup> He felt that many of the concerns raised by the Service charities in the report focused on the discrepancy between national policy and local delivery. He added that “dealing with the disparity of local delivery is at the heart of quite a lot of comments across the Covenant observations from the third sector”.

32. James Greenrod said that the MoD had the data for working-age veterans at the local level across four of the Covenant themes: healthcare, education, accommodation and employment.<sup>41</sup> He added that they were currently in the process of comparing this data with that of the general population to identify where disadvantage exists at the local level, “That work is ongoing with the Office for National Statistics. We hope to have something more to share with you later on this year”.

33. However, in oral evidence, Louise Simpson, the Policy and Research Director at the Army Families Federation, expressed concern that the data on the location of Service families and the type of support they require was lacking.<sup>42</sup> Anna Wright from the Naval Families Federation highlighted the limitations of the Tri-Service Families Continuous Attitude Survey (FAMCAS) with the exclusion of unmarried partners in long term relationships, a cohort that makes up approximately 28% of the Navy.<sup>43</sup> They would like to see FAMCAS open to everybody.

34. Charles Byrne from the Royal British Legion also considered the availability of data as a “fundamental weakness” that needed to be addressed.<sup>44</sup> He believed that adding a veterans question to the national census “will give a foundation of data that everybody will benefit from”. While we welcomed the introduction of a veterans question we were concerned about the security implications of collecting veterans' addresses and sought

39 Ministry of Defence, [Armed Forces Covenant Report 2018](#), 21 November 2018, p 11

40 Q56 [Sir John McColl]

41 Q137 [Mr Greenrod]

42 Q19 [Louise Simpson]

43 Q13 [Anna Wright]

44 Q98 [Mr Byrne]

reassurance that such data would be held and protected by a high level of security.<sup>45</sup> In supplementary written evidence the MoD clarified the precautions being taken that were decided in consultation with National Counter Terrorism Policing, including the Police Service for Northern Ireland:

Once the information has been collected details on numbers of veterans per local authority area will be anonymised and made available to that authority, but only to the definition of the first part of postcodes in order to prevent individuals and their specific locations being identified. Where there are 10 or fewer veterans in a local authority area that authority will receive a nil return in order to prevent individuals from being identified.<sup>46</sup>

35. As well as having access to relevant data on the Armed Forces community to identify disadvantage, our report on the Covenant Annual Report 2017 highlighted the need to assess the impact of funded initiatives. Our report recommended the implementation of independent assessment of Covenant commitments including “ways of measuring impact, outputs and outcomes as well as inputs”.<sup>47</sup> An Outcomes Measurement Framework is being developed by the Veterans and Families Institute at Anglia Ruskin University with an early test version being shared with current grant holders.<sup>48</sup> The Outcomes Measurement Framework will be used to track the progress of projects funded by the Armed Forces Covenant Fund Trust to ensure they are sustainable, cost effective and provide maximum impact to the intended beneficiaries.<sup>49</sup>

**36. We are pleased with the progress in developing an Outcomes Measurement Framework for Covenant funding that will help ensure maximum impact for the Armed Forces community. We are also encouraged by the MoD’s commitment to share data on the disparity of Covenant delivery at the local level in comparison with the general population later this year.**

**37. It is important that identifying disadvantage in the Armed Forces community and measuring the delivery of Covenant initiatives are based on accurate data. The Department should also use current forms of data gathering more effectively. This includes the information captured by Service family surveys such as FAMCAS which reflects modern family structures. We therefore expect the MoD to review current data-gathering tools across Covenant themes to identify gaps and ways of capturing data using new and existing tools. The results of this review should be shared with the Committee.**

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45 Qq143-145

46 Ministry of Defence ([CAR0020](#))

47 Defence Committee, Ninth Report of Session 2017–19, *Armed Forces Covenant Annual Report 2017*, HC 707, para 33

48 Ministry of Defence ([CAR0016](#))

49 Anglia Ruskin University ([CAR0013](#))

## 3 Family life

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### Introduction

38. According to the Armed Forces Continuous Attitude Survey (AFCAS) 2019, the impact of Service life on family and personal life remains the top factor influencing intentions to leave the Armed Forces (62%).<sup>50</sup> Family life was also an area where personnel felt the most disadvantaged in comparison to the general public (51%).<sup>51</sup> According to the Tri-Service Families Continuous Attitude Survey (FamCAS) 2019, 54% of families do not feel valued by the Service.<sup>52</sup>

39. Efforts have been made to modernise the Armed Forces employment offer including the Armed Forces (Flexible Working) Act 2018.<sup>53</sup> The Flexible Service policy allows Regular Service Personnel to apply to serve part-time and/or restrict their separation from their home base for no more than 35 days a year.<sup>54</sup>

### Commonwealth personnel and their families

40. On 5 November 2018, the MoD announced its intention to increase the number of non-resident Commonwealth recruits from 200 to 1,350 per year, and it also removed the five-year residency criterion for Commonwealth applicants.<sup>55</sup> All posts are now open to Commonwealth recruits so long as they are 18 or over and meet the necessary criteria for the Service and role. There are currently 4,500 Commonwealth citizens in the Armed Forces.<sup>56</sup>

41. However, a number of challenges exist for Commonwealth personnel who would like to bring their families with them to the UK. Many of these are explored in the Forces in Mind Trust 2018 report, *Meeting the needs of Commonwealth Personnel and Families: A Map of Service Provision*, including the high costs of visas, the minimum income threshold and the effective communication of immigration rules.<sup>57</sup>

42. Currently, if personnel join the Armed Forces from a Commonwealth country and wish to bring their spouses or partners and children, then they must meet the requirements in the Armed Forces Immigration Rules of 1 December 2013.<sup>58</sup> These include a Minimum Income Threshold (MIT)—currently £18,600 per annum gross—before a spouse can be brought to the UK. For children, personnel must earn an extra £3,800 for the first child and then £2,400 for each additional child. This means that for a family of four with a spouse and two children the serving person must be earning £24,800 for his or her family to come to the UK.<sup>59</sup>

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50 Ministry of Defence, [UK Armed Forces Continuous Attitude Survey Results 2019](#), 24 May 2019, p 13

51 Ministry of Defence, [UK Armed Forces Continuous Attitude Survey Results 2019](#), 24 May 2019, p 22

52 Ministry of Defence, [UK Tri-Service Families Continuous Attitude Survey Results 2019](#), 25 July 2019, p 9

53 Northumbria and Chester University ([CAR0001](#))

54 Ministry of Defence, [Guidance](#), 7 May 2019

55 Ministry of Defence, [press release](#), 5 November 2018

56 Ministry of Defence, [press release](#), 5 November 2018

57 Forces in Mind Trust, [Meeting the Needs of Commonwealth Personnel and their Families: A Map of Service Provision](#), March 2018.

58 Home Office ([CAR0022](#))

59 House of Commons Library, [Fair treatment for Commonwealth personnel in the armed forces](#), 2 May 2019, p 2

43. Following recommendations from the Armed Forces' Pay Review Body, the MoD increased the basic pay of personnel, across the board, by 2.9% from 1 April 2019.<sup>60</sup> It also increased the starting salary for Service personnel by 6% (£1,140). The increase meant that, after basic training, new and junior personnel would receive an annual salary of £20,000 per year.<sup>61</sup> This is a welcome increase but is still insufficient for some families to join their loved ones in the UK. According to supplementary written evidence from the Naval Families Federation, serving personnel would have to wait several years before they could be reunited with their families.<sup>62</sup>

44. The Service charities and the Service Families Federations all call for a review of the current Home Office policy with a waiver on the MIT, as well as better quality communication from the MoD to potential recruits on the financial requirements for Commonwealth personnel and their families who wish to move to the UK.<sup>63</sup>

45. Once the MIT has been achieved, the family must pay for a visa to enter the UK. Visa fees for applications made from outside the UK are currently £1,523 per applicant and this confers leave to remain for 5 years.<sup>64</sup> After that time, applicants can apply for Indefinite Leave to Remain (ILR) which costs £2,389 per applicant. They are also eligible to apply for naturalisation which costs £1,206 for adults and £1,012 for children.<sup>65</sup> These challenges also extend to Gurkhas and to British and Irish personnel who have non-EU dependents.<sup>66</sup>

46. Families of serving personnel are eligible to apply for ILR after five years. Armed Forces personnel are eligible after 4 years' service, but they can make such an application only after being discharged. As the cost for ILR increases every year, and has risen markedly over the last eight years (increasing 184% for adults and 1,725% for children), this means that Commonwealth personnel pay more the longer they serve and may pay considerably more than a civilian who can apply after 5 years.<sup>67</sup>

47. COBSEO told us that the problems faced by Commonwealth personnel were a failure of Government policy and that, if the MoD continued to recruit Commonwealth personnel at the rate they expect, then "this problem is going to balloon".<sup>68</sup>

48. Rt Hon Tobias Ellwood MP, the then Minister for Defence People and Veterans, explained that the MoD needed to collect relevant family data on UK Armed Forces personnel to understand fully the extent and impact on personnel and their families. Currently, the Joint Personnel Administration (JPA) system—the intranet-based personnel administration system used by the Armed Forces—does not record the number of dependants, their nationality or immigration status.<sup>69</sup> The data recorded on the Personal Status ("P Stat") of Service Personnel to determine eligibility for expenses, allowances and Service accommodation relies on personnel self-declaring and does not distinguish between dependants residing in the UK or abroad.

60 Armed Forces' Pay Review Body, [Forty-Eighth Report 2019](#), CP 126, 22 July 2019, xii

61 Ministry of Defence, [press release](#), 22 July 2019

62 Naval Families Federation ([CAR0018](#))

63 Army Families Federation ([CAR0017](#)), Naval Families Federation ([CAR0018](#)), RAF Families Federation ([CAR0019](#))

64 Naval Families Federation ([CAR0018](#))

65 Naval Families Federation ([CAR0018](#))

66 [Letter to Chairman](#) from Rt Hon Tobias Ellwood MP, 11 June 2019

67 Army Families Federation ([CAR0017](#))

68 Q78 [Sir John McColl]

69 [Letter to Chairman](#) from Rt Hon Tobias Ellwood MP, 11 June 2019



49. In oral evidence, the Service charities and the Service Families Federations all raised concerns regarding the challenges faced by Commonwealth personnel and their families. Louise Simpson from the Army Families Federation had huge concerns about taking on more foreign and Commonwealth personnel, partly because they are not properly informed about the costs of visas and MIT. She characterised the situation of “asking people to put their lives on the line and then not allowing their families and children to come over to the UK” as “immoral”.<sup>70</sup> In supplementary written evidence, the Naval Families Federation stated that this situation causes “much distress”<sup>71</sup> to serving personnel and their families, adding that “we are aware of individuals who haven’t seen their loved ones for a period of years”.

50. The Ministry of Defence recognised the importance of the wider family network in their 2016 Families Strategy, which stated that “our personnel can only fully deliver their Defence task if they have the support of their families as well as the confidence that their loved ones will be able to access the right support when required”.<sup>72</sup> Rt Hon Tobias Ellwood MP, told us “I have made clear my support, and that of my Department, for the removal of these fees and income constraints for Armed Forces personnel and their families”,<sup>73</sup> adding that “I believe there is a moral case for this change and we have been discussing this issue with the Home Office for some months”. He told us that the then Home Secretary was reviewing the MoD’s request “whilst recognising there are other parts of the public sector who might also make similar arguments”.

51. On 2 April 2019, we wrote to the then Home Secretary, Rt Hon Sajid Javid MP, on the impact of the MIR and visa fees for Commonwealth personnel, veterans, and their dependants. He responded:

The Home Office reviews fees on a yearly basis and income from fees play a vital role in our ability to run a sustainable immigration and nationality system. Any reductions or exemptions for some must necessarily shift the burden to other applicants and the general taxpayer. All immigration and nationality fees are set within strict financial limits agreed with HM Treasury and Parliament. The level of any fee is also aligned with clear principles that balance several complex factors, including the benefits likely to be accrued by the applicant.<sup>74</sup>

52. This issue gained cross-party support in April 2019 when a group of 133 MPs from eight different parties signed a letter urging the then Home Secretary to waive visa fees for Commonwealth soldiers.<sup>75</sup>

**53. We are very concerned with the treatment of Commonwealth Service personnel and their families which the Army Families Federation has described as “immoral”. There has been a failure adequately to acknowledge the contribution these individuals and their families make to the defence and security of the UK. We recognise that the issue of Minimum Income Threshold (MIT), visa fees and Indefinite Leave to Remain (ILR) are Home Office policies; but the MoD must do more to record relevant family**

70 Q39 [Louise Simpson]

71 Naval Families Federation ([CAR0018](#))

72 Ministry of Defence, *UK Armed Forces Families’ Strategy 2016–2020*, 14 January 2016, Foreword.

73 [Letter to Chairman](#) from Rt Hon Tobias Ellwood MP, 11 June 2019

74 Home Office ([CAR0022](#))

75 [The Telegraph, 24 April 2019](#)

**data, in order that the extent of the problem across the Armed Forces can be fully understood. The MoD must ensure that the financial requirements laid upon personnel and their families when moving to the UK are effectively communicated at the point of recruitment. It must also ensure that high quality advice and guidance is available to those currently serving.**

**54. In response to our report the MoD should set out its plans for improving its collection of the relevant family data of serving personnel. It should also set out in detail an improved communication strategy to fully inform non-UK personnel, who are both serving and at the early stage of the recruitment process, about the financial requirements for dependants to be able to join them in the UK. We encourage the new Defence Secretary to continue discussions with the Home Office in order to resolve this issue quickly.**

## Dispersed families

55. Military operations are not the only cause of separation in military families. Annex B of the Tri-Service Families Continuous Attitude Survey 2019 reports that 24% of UK Armed Forces families live separately from serving personnel during the working week, known as “weekending”.<sup>76</sup>

56. Northumbria and Chester University is currently developing the Map of Need project to identify the welfare needs of veterans and their families across the UK. Its research shows that military families are becoming increasingly dispersed.<sup>77</sup>

57. Although support provisions exist for the families of serving personnel—such as welfare services and the tri-Service Families Federations—they are often located in or around military establishments.<sup>78</sup> The introduction of the Armed Forces (Flexible Working) Act 2018 and the proposed Future Accommodation Model (FAM) may change the traditional model for Service families, leaving them with more choice and more flexibility. Northumbria and Chester University suggests that the increase in dispersed families means that the Armed Forces Covenant has a responsibility to ensure these families are not further disadvantaged by being dispersed.<sup>79</sup> Early findings from this research “indicate a lack of understanding and access to services appropriate to their situation”. In fact, many of the support services being utilised by these families are provided by civilian third sector organisations outside the Armed Forces sector.

58. Anna Wright from the Naval Families Federation thought that there was little support for families in the community who have the added burden of separation from a loved one. She believed that this was taking a toll on family relationships and impacting on retention within the Armed Forces: “A part of the retention equation is lack of family time—that is a real concern for me”.<sup>80</sup>

76 Ministry of Defence, *UK Tri-Service Families Continuous Attitude Survey 2019*, [Annex B](#), 25 July 2019, table B1.3

77 Northumbria and Chester University ([CAR0001](#))

78 Northumbria and Chester University ([CAR0001](#))

79 Northumbria and Chester University ([CAR0001](#))

80 Q16 [Anna Wright)

59. The RAF Families Federation published a *Survey Snapshot: Benefits and challenges of dispersed living*.<sup>81</sup> It showed the advantages of dispersed living including living in your own home and the stability of family life.<sup>82</sup> However, families were also likely to feel disadvantaged in comparison with those living in Service Family Accommodation (SFA), for reasons including regular separation and distance from the parent unit—which creates a barrier to available support.<sup>83</sup>

60. Anna Wright told us the Joint Personnel Administration (JPA) does not hold the necessary information on personnel and their families. She added that “it is very difficult to provide support unless you know this. I think the first step is to incentivise people to share their data, and to explain to them why it is important”.<sup>84</sup>

**61. We welcome MoD initiatives to modernise Armed Forces employment. However, we are concerned that the MoD is not adapting access to its support mechanisms to accommodate the effects of these changes. Dispersed families are reporting that the distance from the parent unit creates barriers to available support. Given that the number of dispersed families appears to be growing, the MoD must ensure that these families are not disadvantaged in their access to support services. Addressing these issues will be vital if the Future Accommodation Model (FAM) is to succeed.**

***62. In response to our report the MoD should clarify what data it has on the number of dispersed families within the Armed Forces. It should take steps to ensure that dispersed families are aware of and have access to support services. The MoD should also continue to monitor whether its flexible working initiative has a positive impact on dispersed families.***

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81 RAF Families Federation, [Survey Snapshot: Benefits and challenges of dispersed living](#), 28 February 2019

82 RAF Families Federation, [Survey Snapshot: Benefits and challenges of dispersed living](#), 28 February 2019, p 4

83 RAF Families Federation, [Survey Snapshot: Benefits and challenges of dispersed living](#), 28 February 2019, p 6

84 Q18 [Anna Wright]

## 4 Education

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### Mobility and Service children's education

63. In January 2019 there were 103,620 children of UK Regular personnel.<sup>85</sup> This was comprised of 90,020 children under 18 years old and 13,600 who were 18 and over.

64. The Children's Commissioner for England has highlighted the "unique nature of childhood in a serving military family",<sup>86</sup> which means that many children grow up "quite differently from their peers". This is due to the mobile lifestyle of Service families which often leads to children repeatedly moving schools. The report stated that children who experienced multiple moves had been left feeling "unsettled and anxious about achieving good grades". For children who have special educational needs, this process "can add another layer of complexity, with the need to find suitable schooling and the transfer of support plans often a complicated and frustrating task".

65. In a letter to the Committee, the then Minister for Defence People and Veterans, Rt Hon Tobias Ellwood MP, set out the progress being made in improving the transition of Service children with Special Educational Needs and Disabilities (SEND):

The MoD's Directorate for Children and Young People has my Department's lead for SEND. DCYP is working closely with local authorities through the MoD Local Authority Partnership to improve the transition of Service children with SEND between the 15 English local authorities with the highest numbers of Service children (as formed within the MoD/Local Authority Partnership).<sup>87</sup>

66. He added:

At the time of writing, this group of authorities are in the process of drafting a series of agreed principles, which local authorities in this group would follow when supporting the transition of Service children with SEND into or out of their local authority area. Further work is planned to explore how similar local authority constructs in the Devolved Administrations may be able to connect to improve the experiences of children with SEND, when transitioning between local authorities in different UK administrations.

67. The Covenant Annual Report 2018 provided data from the National Pupil Database for 2016/2017 which showed Service children's performance in schools in England across all key pupil progress and attainment measures. It demonstrates that, on average, Service children were on a par with or performing better than non-Service children: however, average attainment levels at the end of key stage 2 and at the end of key stage 4 were lower among Service children who moved schools on multiple occasions than children

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85 Ministry of Defence, [Freedom of Information](#), 19 February 2019. The figures are estimates based on Service personnel self-declaring children on the Joint Personnel Administration (JPA) system and have not been validated.

86 Children's Commissioner, [Kin and Country: Growing up as an Armed Forces child](#), June 2018, p 1

87 Ministry of Defence ([CAR0021](#))

(both Service and non-Service) who moved less frequently.<sup>88</sup> The report acknowledges that “more needs to be done to understand the causal relationship between the mobility of Service life, educational attainment and general welfare”.<sup>89</sup>

68. According to a 2019 survey conducted by the Army Families Federation (AFF), 47% of families said that their children had experienced a gap in their learning due to changing schools.<sup>90</sup> The same survey revealed that 89% of families often consider, sometimes consider, or have decided on leaving the Army due to the impact of Service life on their children.<sup>91</sup>

69. In 2018, the Service Children’s Progression (SCiP) Alliance was commissioned to conduct the first UK-wide stakeholder consultation on Service children in education. The SCiP Alliance is a partnership of organisations funded by the MoD seeking to improve outcomes for children from military families. In written evidence, it reported that the research identified a lack of data which hampered understanding of “the complex experiences of Service children and the impacts on their education progression”.<sup>92</sup> This data would be fundamental in ensuring that limited resources were targeted effectively. The SCiP Alliance recommended the development of “a coherent government approach to tracking the number and location of these children and young people across all four UK nations (and internationally), which could be shared with researchers”.<sup>93</sup>

70. The Tri-Service Families Continuous Attitude Survey (FAMCAS) 2019 reported that 19% of families with school aged children experienced difficulties with their children’s schooling in the preceding 12 months.<sup>94</sup> The most common concerns included getting a place at the school of their choice (7%) and the unsuitable educational standard of their local school (6%).

71. In its observations for the 2018 Covenant Annual Report, the Service Families Federation said there had been a “distinct spike in school admissions issues being raised with the Families Federations”<sup>95</sup> with the process of finding school places described as a “key source of anxiety for Service families”.

72. The MoD stated in the 2018 Annual Report that it was reviewing the assignment policy to see if more flexibility could be given to Service families when their children are “at critical stages of their education and [to] those with Special Educational Needs and/or Disability provision”.<sup>96</sup> It goes on to state that the MoD and the Department for Education will be reviewing the provisions for Service children in the School Admissions Code.

73. Louise Simpson from the Army Families Federation identified pinch points in Hampshire and Wiltshire for school admissions—counties which will be the most affected by rebasing from Germany.<sup>97</sup> In written evidence, the Federation recommended

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88 Ministry of Defence, [Armed Forces Covenant Report 2018](#), 21 November 2018, p 56

89 Ministry of Defence, [Armed Forces Covenant Report 2018](#), 21 November 2018, p 51

90 Army Families Federation, [AFF Listening to our Service Children survey](#), June 2019, p 2

91 Army Families Federation, [AFF Listening to our Service Children survey](#), June 2019, p 1

92 The Service Children’s Progression Alliance ([CAR0002](#))

93 The Service Children’s Progression Alliance ([CAR0002](#))

94 Ministry of Defence, [UK Tri-Service Families Continuous Attitude Survey Results 2019](#), 25 July 2019, p 13

95 Ministry of Defence, [Armed Forces Covenant Report 2018](#), 21 November 2018, p 18

96 Ministry of Defence, [Armed Forces Covenant Report 2018](#), 21 November 2018, p 52

97 Q24 [Louise Simpson]

legislative change to the School Admissions Code to allow priority allocation for Service children who are in highly mobile families, at critical stages of their education, or with special education needs or disabilities.<sup>98</sup>

**74. We are concerned that the mobile lifestyle expected of Service personnel may disadvantage their children. Data in the Armed Forces Covenant Report 2018 suggested that a career in the Armed Forces may negatively affect Service children’s attainment levels since they have to move schools often. The challenge of finding and securing a suitable school, especially at critical stages of a child’s education or for those who have special educational needs or disabilities, is understandably a “key source of anxiety for Service families”.**

*75. We agree with the recommendation made by the Service Children’s Progression (SCiP) Alliance that a coherent Government approach should be developed to track the number and location of Service children across the UK and internationally which can be shared with researchers seeking to understand the causal relationship between the mobility of Service life and the effect on educational attainment. The Department should also set out the steps it has taken in coordination with the Department for Education and local authorities around the UK to improve the admissions process for Service children, especially those with special educational needs, so they are not disadvantaged. This should include an update on the review into the provisions for Service children in the School Admissions Code.*

76. Research conducted by the SCiP Alliance indicated that Service children are less likely to go to University than the general population.<sup>99</sup> This was confirmed in oral evidence by the then Minister, Mr Ellwood:

We don’t fully understand that but we are looking into it. A study is being conducted by Winchester University specifically to try to learn more about that and see whether we can create more pathways to encourage Service children to have a gateway into universities.<sup>100</sup>

77. He continued that this was a joint responsibility with the Department for Education, who would need to be encouraged to track Service children beyond 16.<sup>101</sup>

**78. There is evidence that children from Service families are disadvantaged in accessing higher education compared to the general population: this is unacceptable. In response to our report, the MoD should set out in detail what actions it is taking both unilaterally and in coordination with the Department for Education to address this disadvantage. This should include plans to collect data on Service children post-16. Data and analysis of this cohort should be included in future Covenant Annual Reports.**

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98 Army Families Federation ([CAR0003](#))

99 The Service Children’s Progression Alliance ([CAR0002](#))

100 Q154 [Mr Ellwood]

101 Q156 [Mr Ellwood]

## Service Pupil Premium and Education Support Fund

79. Since 2011, the Department for Education has used the Service Pupil Premium (SPP) as a form of additional funding to help schools improve the educational outcomes and wellbeing of children from Service Families,<sup>102</sup> mainly through pastoral support.<sup>103</sup> State-funded schools in England attended by Service children or those who have had this status in the last six years are allocated a premium of £300 per annum for every eligible pupil.<sup>104</sup> Currently, SPP applies to children from Reception to Year 11.<sup>105</sup> The funding is used “to help mitigate the negative impact on Service children of family mobility or parental deployment”.<sup>106</sup>

80. According to the Army Families Federation 2019 survey on Service children, 52% of Army personnel and their families who were surveyed stated that they felt that their school’s use of SPP did not provide any effective support.<sup>107</sup>

81. Although the MoD’s Directorate for Children and Young People (DCYP) published updated guidance on how to use SPP through examples of best practice,<sup>108</sup> the Service Families Federations expressed concern in their joint observations for the 2018 Annual Report. They noted a mixed response from parents who are concerned with how their children’s schools were using SPP and would like to see “additional guidance and case studies of effective practice provided to schools with low numbers of Service pupils”.<sup>109</sup>

82. The best practice examples offer no case studies for schools with low numbers of Service children. However, in written evidence to the Committee, the SCiP Alliance stated that their initial analysis suggested that “approximately 90% of schools receiving SPP in England have fewer than 12 Service children and 31% have only one Service child”.<sup>110</sup>

83. Schools with low numbers of Service children may need additional support in identifying the types of challenges that Service children encounter and how SPP can be tailored to their needs.

84. The Service charities also told us that there was confusion felt by families in respect of the provision of support to Service children across the devolved administrations.<sup>111</sup> SPP only applies to England, although the devolved administrations have their own provisions. In supplementary written evidence, the MoD set out the different approaches with Wales introducing their equivalent of an Education Support Fund (£250,000 per annum) to support Service children across Wales and Scotland’s provision of Additional Support for Learning which includes Service children.<sup>112</sup>

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102 Ministry of Defence, [Armed Forces Covenant Report 2018](#), 21 November 2018, p 54

103 Ministry of Defence, [Service Pupil Premium: what you need to know](#), 8 August 2019

104 Ministry of Defence, [Armed Forces Covenant Report 2018](#), 21 November 2018, p 54

105 Ministry of Defence, [Service Pupil Premium: what you need to know](#), 8 August 2019

106 Ministry of Defence, [Service Pupil Premium: what you need to know](#), 8 August 2019

107 Army Families Federation, [AFF Listening to our Service Children survey](#), June 2019, p 3

108 Ministry of Defence, [Service Pupil Premium: examples of best practice](#), 8 August 2019

109 Ministry of Defence, [Armed Forces Covenant Report 2018](#), 21 November 2018, p 18

110 The Service Children’s Progression Alliance ([CAR0002](#))

111 Q28 [Maria Lyle and Anna Wright]

112 Ministry of Defence ([CAR0020](#))

85. Maria Lyle, Director of the RAF Families Federation told us that families are accustomed to SPP in England and they are concerned when they see that it is absent in the devolved administrations.<sup>113</sup> Anna Wright from the Naval Families Federation told us that there was a lack of transparency:

There is a perception that you have the Service Pupil Premium in England and then there is nothing in Scotland. However with GIRFEC [Getting It Right for Every Child]<sup>114</sup> every child is taken care of.<sup>115</sup>

86. The specificities of the different systems in the devolved administrations are not well understood. The education data in the Covenant Annual Report 2018 only covers England.<sup>116</sup> Written evidence from the Royal Caledonian Education Trust, a Scottish Armed Forces children's charity, stated that "there is a notable lack of accurate data about Armed Forces children and young people in Scotland", and where there was data, it was not publicly available.<sup>117</sup>

87. Despite publications such as *Welcome to Scotland: A guide for Service personnel and their families moving to Scotland* (2018)<sup>118</sup> and *Welcome to Wales: Supporting and investing in our Armed Forces Community in Wales* (2016),<sup>119</sup> there are difficulties communicating information to Service families.

88. In our previous report we expressed concern that the Education Support Fund (ESF) was due to close.<sup>120</sup> We welcome the MoD's two-year extension of the ESF, this is essential considering the drawdown from Germany and the defence rationalisation plan. We look forward to monitoring the Fund's progress and future relevance.

**89. We welcome the MoD's extension of the Education Support Fund and its guidance for schools on how to spend Service Pupil Premium effectively. However, we would like to see more examples of best practice which include schools with low numbers of Service children—the majority of schools receiving Service Pupil Premium. In response to our report, the MoD should provide additional guidance and case studies of best practice for schools with low numbers of Service children. These examples should be circulated to all schools with Service children and made easily accessible to Service families.**

**90. We commend the publication of the 'Welcome to' packs for families moving between devolved administrations. However, we are concerned that the key information contained in these documents is not reaching Service families. We are also concerned at the lack of data from devolved administrations about Service children presented in the Covenant Annual Report. In response to our report, the MoD, in coordination with the devolved administrations, should improve its outreach processes to Service families**

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113 Q28 [Maria Lyle]

114 GIRFEC is the national approach in Scotland to improving outcomes and supporting the wellbeing of children and young people.

115 Q28 [Anna Wright]

116 Ministry of Defence, [Armed Forces Covenant Report 2018](#), 21 November 2018, pp 56-64

117 The Royal Caledonian Education Trust (CAR0014)

118 Scottish Government, [Welcome to Scotland: a guide for service personnel and their families moving to Scotland](#), June 2018

119 Welsh Government, [Welcome to Wales: Supporting and investing in our Armed Forces Community in Wales](#), 2016

120 Defence Committee, Ninth Report of Session 2017–19, [Armed Forces Covenant Annual Report 2017](#), HC 707, para 137



*to ensure that they are fully informed of differences in the way support is provided for Service children across the devolved administrations. The MoD should ensure data from the devolved administrations is collected and incorporated into future Covenant Annual Reports.*

## 5 Healthcare

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### Priority Access to NHS Medical Treatment

91. The Government announced in November 2007 that priority access to NHS medical treatment would be extended to all veterans whose injuries or ill health were attributable to their military service.<sup>121</sup> This included guidance to GPs that they should make the veteran status of a patient clear in referrals, so that they can be considered for priority treatment in seeking secondary care for conditions related to military service.

92. However, the 2018 Annual Report again included criticism from the Royal British Legion of the implementation of this policy:

Issues persist around lack of awareness and understanding, inconsistency of and inability to measure implementation, and a lack of clarity about the interpretation of the policy by government.<sup>122</sup>

93. In oral evidence, Charles Byrne from the Royal British Legion commented on the different interpretation of priority treatment by Armed Forces personnel and the NHS. He believed there was confusion as to what the Covenant was asking of Government services:

It was introduced very much as priority treatment understood in terms of time, so you would get your treatment sooner that way. That is not always understood in the same way in the NHS; it is typically understood as creating specific pathways. There is a fundamental difference in understanding how priority treatment plays out, and that affects this as well.<sup>123</sup>

94. In response to our 2018 report on *Mental Health and the Armed Forces, Part One: The Scale of Mental Health Issues*, the MoD said that all veterans in Great Britain were entitled to priority access to NHS care for conditions that are Service attributable.<sup>124</sup> Priority treatment, however, was not available to veterans resident in Northern Ireland due to Section 75 of the Northern Ireland Act.

95. In 2019 we again raised concerns about the understanding and implementation of priority treatment across the UK in our report *Mental Health and the Armed Forces, Part Two: The Provision of Care*. We recommended that the Government clearly articulate how priority treatment should be implemented in practice and then communicate this expectation to relevant stakeholders across the UK.<sup>125</sup> In response to this report the MoD said:

... the MoD will work with the Department of Health and Social Care and in consultation with the Devolved Administrations to develop a clear definition of priority treatment and work together to develop a simple clear

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121 Ministry of Defence, [press release](#), 23 November 2007

122 Ministry of Defence, [Armed Forces Covenant Report 2018](#), 21 November 2018, p 23

123 Q67 [Mr Byrne]

124 Defence Committee, [Twelfth Special Report of Session 2017–19, Mental Health and the Armed Forces, Part One: The Scale of mental health issues: Government Response to the Committee's Eleventh Report of Session 2017–19](#), 9 October 2018, p 7

125 Defence Committee, Fourteenth Report of Session 2017–19, [Mental Health and the Armed Forces, Part Two: The Provision of Care](#), HC 1481, para 92

guide to outline the Veterans specific services that are available across the UK and practical steps to put clinical priority into action for Veterans with Service attributable conditions whilst ensuring fairness to all NHS patients.<sup>126</sup>

96. On 8 February 2019, the Department of Health and Social Care told us that it recognised that more could be done, and that the Partnership Board between it and the MoD would be working towards a clearer definition of priority care for 2019–2020.<sup>127</sup>

**97. We are concerned that we are still hearing about continuing difficulties in understanding and implementing veteran priority access to NHS medical treatment when injuries or ill-health are attributable to their military service. There continues to be confusion within Government as to how priority treatment should be implemented. We conclude that the only way to give priority to veterans is to establish dedicated NHS pathways and facilities for veterans. Otherwise, there will continue to be an understandable reluctance within the NHS for anyone to receive priority treatment on the basis of anything other than current clinical need.**

**98. We call for an update on the Department’s work with the Department of Health and Social Care and the devolved administrations to develop a clear definition of priority treatment for veterans and practical steps to ensure veterans with Service attributable conditions have clinical priority. We expect this work to be taken forward urgently and in their response the Government should include a timeline for its completion.**

## Continuity of care pathways for Service families

99. In written evidence, the Naval Families Federation acknowledged the achievements made in supporting veterans, but highlighted the importance of access and continuity of healthcare for families of serving personnel:

Evidence presented to us suggests that access to appropriate and continuing healthcare remains an issue for some non-serving family members, particularly those with complex medical needs who have to move between Clinical Commissioning Groups as a result of an assignment. Whilst we recognise that policy changes have been implemented to support them, we are concerned that families are still facing considerable challenges when trying to transfer their care pathways.<sup>128</sup>

100. In joint observations for the 2018 Covenant Annual Report, the Service Families Federations highlighted access to dental services as an ongoing issue for families in certain locations “particularly our most remote stations and units”.<sup>129</sup>

101. The 2018 Annual Report acknowledged that Service families may feel disadvantaged due to their serving partners’ postings if they move from one place in which they had access to a dentist, to another where they do not.<sup>130</sup>

126 Defence Committee, *Eighteenth Special Report of Session 2017–19, Mental Health and the Armed Forces, Part Two: The Provision of Care: Government Response to the Committee’s Fourteenth Report of Session 2017–19*, 21 May 2019, p 18

127 Defence Committee, Fourteenth Report of Session 2017–19, *Mental Health and the Armed Forces, Part Two: The Provision of Care*, HC 1481, para 88

128 Naval Families Federation ([CAR0011](#))

129 Ministry of Defence, *Armed Forces Covenant Report 2018*, 21 November 2018, p 18

130 Ministry of Defence, *Armed Forces Covenant Report 2018*, 21 November 2018, p 88

102. In oral evidence from the Service Families Federations, we were told that in cases in which the medical needs of a child or spouse are complex and availability/access in a new area was not guaranteed, this may contribute to Service personnel choosing to leave the Armed Forces:

**Louise Simpson:** We do not have hard data on that, but the impact on families and on serving personnel taking leave is high, so I imagine that that issue does influence it.

**Anna Wright:** I think there is more awareness of the Covenant, but for someone with complex medical needs, moving between CCGs and moving the care pathway is a major issue. It is very complex. People are reticent to do it, and they reach out to us.<sup>131</sup>

103. Service families with a child with SEND issues or who need access to Child and adolescent mental health services (CAMHS) face additional challenges. In follow-up written evidence, the MoD stated:

Priority is determined and commissioned by local need and resource levels. The Ministry of Defence (MOD) Covenant Team works with colleagues in NHS England, the Devolved Administrations and local authorities to mitigate disadvantage where possible in comparison to the general population.

Where it is necessary for a move, the ability for Service families to transfer their (relative) place on health waiting lists is one example of this and the continuation of physical healthcare services is often achievable. However, for mental healthcare or other specialist care, this can often be less straightforward, sometimes requiring reassessment by the relevant professional at the new location, in accordance with their professional obligations, practice and duty of care. Therefore, frequent mobility can have a profound impact on more vulnerable families where bespoke healthcare provision is necessary and various interventions are in place.<sup>132</sup>

**104. The disruption of care pathways for families of serving personnel who are relocated is a clear disadvantage and is contrary to the values of the Covenant. This will affect retention in the Armed Forces, especially of families with complex medical needs. This issue must be addressed if the Armed Forces is to be an attractive employer.**

**105. *The MoD must establish an effective system in coordination with NHS England, the devolved administration and local authorities to ensure that Service families receiving ongoing care are provided with equivalent support when re-located.***

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131 Q32 [Louise Simpson & Anna Wright]

132 Ministry of Defence ([CAR0021](#))

## Mental Health

106. In 2017, the MoD launched its Defence People Mental Health and Wellbeing Strategy 2017–2022, for the Armed Forces, their families, veterans and Defence civilians.<sup>133</sup> It includes plans to invest in research, improve access to clinical assessments and prioritisation for treatment, improve communication to the workforce about what support is available and introduce standardised mental health and wellbeing education and training.

107. In the same year NHS England launched the Transition, Intervention and Liaison Service (TILS). The 2017 Covenant Report stated that the service would increase access to mental health services and treatment options, as well as providing support for the general and complex mental health needs of veterans.<sup>134</sup> It also gave serving personnel preparing to leave the Armed Forces the ability to access NHS care and treatment for mental health conditions. This was followed in April 2018 with the launch of the NHS Veterans' Mental Health Complex Treatment Service (CTS), a next step to TILS, with “enhanced local community-based service for veterans who have military attributable complex mental health problems ...”.<sup>135</sup> The service includes support for “substance misuse, physical health, employment, accommodation, relationships and finances, as well as occupational and trauma-focused therapies”. Since its launch TILS has referred 120 patients with 94% being accepted.

108. Currently, treatment offered through TILS and CTS does not extend to families of veterans or serving personnel, although according to the Secretary of State for Health and Social Care, Rt Hon Matt Hancock MP, this is being reviewed.

109. In the MoD's report *UK Armed Forces Mental Health: Annual Summary & Trends Over Time, 2007/08-2018/19*, it reported that in 2018/19 2.7% of UK Armed Forces personnel were assessed with a mental disorder at an MoD Specialist Mental Health Services, a reduction on the previous year.<sup>136</sup> This represents approximately 3 in 100 Armed Forces personnel.<sup>137</sup> The rate of PTSD remained low at 0.2% in 2018/19,<sup>138</sup> however there was an increased risk of 170% for PTSD for Service personnel who had previously deployed to Iraq and/or Afghanistan.<sup>139</sup>

110. On 25 February 2019, we published a report *Mental Health and the Armed Forces, Part Two: The Provision of Care*. One of our main recommendations was the establishment of a National Mental Health Residential Rehabilitation Centre that would be exclusively for either serving or ex-serving personnel.<sup>140</sup> It was suggested that this centre should be co-located with the new state-run Defence and National Rehabilitation Centre (DNRC) for physically injured serving personnel at Stanford Hall. We requested that the NHS should urgently consult with the MoD and the DNRC to establish “an initial operating

133 Ministry of Defence, [Defence People Mental Health and Wellbeing Strategy 2017–2022](#), 20 July 2017

134 Ministry of Defence, [Armed Forces Covenant Annual Report 2017](#), 18 December 2017, p 25

135 Ministry of Defence, [Armed Forces Covenant Report 2018](#), 21 November 2018, p 37

136 Ministry of Defence, [UK Armed Forces Mental Health: Annual Summary & Trends Over Time, 2007/08-2018/19](#), 20 June 2019, p 1

137 Ministry of Defence, [UK Armed Forces Mental Health: Annual Summary & Trends Over Time, 2007/08-2018/19](#), 20 June 2019, p 4

138 Ministry of Defence, [UK Armed Forces Mental Health: Annual Summary & Trends Over Time, 2007/08-2018/19](#), 20 June 2019, p 1

139 Ministry of Defence, [UK Armed Forces Mental Health: Annual Summary & Trends Over Time, 2007/08-2018/19](#), 20 June 2019, p 12

140 Defence Committee, Fourteenth Report of Session 2017–19, [Mental Health and the Armed Forces, Part Two: The Provision of Care](#), HC 1481, para 102

capability” within 12-18 months of the report. In its response, the MoD welcomed the recommendation and stated, “We would like to explore this option further in the months ahead”.<sup>141</sup>

111. On 17 July 2019, Committee members met with the Health Secretary in which he reiterated his support for a dedicated Mental Health Centre.

**112. We welcome the work of the MoD in coordination with health departments in the UK on the introduction of veteran-specific specialist mental health services. However, we repeat the recommendation made in our report *Mental Health and the Armed Forces, Part Two: The Provision of Care* that a National Mental Health Residential Rehabilitation Centre that is exclusively for either serving or ex-serving personnel should be established and co-located with the new state-run Defence and National Rehabilitation Centre (DNRC) for physically injured serving personnel at Stanford Hall. In response to our report, the MoD should update us on any consultations, so far, between the Department, the NHS and DNRC on establishing this vital facility, and on the timeline proposed for doing so.**

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141 Defence Committee, *Eighteenth Special Report of Session 2017–19, Mental Health and the Armed Forces, Part Two: The Provision of Care: Government Response to the Committee’s Fourteenth Report of Session 2017–19*, 21 May 2019, p 24

## 6 Accommodation

113. The Armed Forces Continuous Attitude Survey (AFCAS) 2019, reported that 78% of personnel live in Service accommodation during the working week.<sup>142</sup> This was split between 39% of personnel in Single Living Accommodation (SLA) and 32% of personnel in Service Family Accommodation (SFA). The remaining 7% occupy Substitute SFA/SLA or live onboard a ship or submarine. The survey found that satisfaction with the overall standard of Service accommodation had dropped from 58% in 2014 to 52% in 2019.

114. In their joint observations for the Covenant Annual Report 2018, the Service Families Federations stated that accommodation “continues to be our most highly reported issue”.<sup>143</sup>

### Amey and the Future Defence Infrastructure Services

115. The MoD’s Defence Infrastructure Organisation (DIO) manages some 50,000 properties in the UK and is responsible for the SFA housing stock. These responsibilities include the maintenance and repair of SFA which is delegated to private sector providers through the National Housing Prime (NHP) contract. In 2014 this contract was given to CarillionAmey. Since the contract was awarded, the poor performance of CarillionAmey has been criticised by the Committee in our 2016 and 2017 Covenant Annual Reports as well as by the National Audit Office (NAO), the Armed Forces Pay Review Body and the Public Accounts Committee.<sup>144</sup>

116. In January 2018, it was announced that Carillion (one of the parent companies in the CarillionAmey joint venture partnership) was entering into liquidation. On 15 January 2018, Amey released a statement confirming that it would continue to provide the services agreed in the contract.<sup>145</sup>

117. In response to our 2017 Covenant Annual Report, the MoD acknowledged that there were shortcomings within the NHP contract “and that CarillionAmey’s (CA) performance in the early years, especially around response maintenance, was inadequate”.<sup>146</sup> The MoD added that CA’s performance had improved and that the collapse of Carillion plc “has not had an impact on the positive upward trend in performance”. However, low satisfaction levels in maintenance and repairs are still being reported.

118. Annex B of AFCAS 2019 details the specific figures for SFA satisfaction. The tri-service percentages for satisfaction are 33% for response to request for maintenance/repair and 30% for the quality of maintenance/repair work.<sup>147</sup> In the oral evidence session with the Service charities, General McColl of COBSEO, said these low levels of satisfaction

142 Ministry of Defence, [UK Armed Forces Continuous Attitude Survey Results 2019](#), 24 May 2019, p 19

143 Ministry of Defence, [Armed Forces Covenant Report 2018](#), 21 November 2018, p 18

144 See Defence Committee, Ninth Report of Session 2016–17, [Armed Forces Covenant Annual Report 2016](#), HC 492; Defence Committee, Ninth Report of Session 2017–19, [Armed Forces Covenant Annual Report 2017](#), HC 707; Public Accounts Committee Ninth Report of Session 2016–17, [Service Family Accommodation](#), HC 77; National Audit Office, [Service Family Accommodation update](#), Memorandum prepared for the Public Accounts Committee, January 2017; and Armed Forces Pay Review Body, [Forty Sixth Report 2017](#), Cm 9437, 28 March 2017

145 [“Statement about CarillionAmey”](#), Amey press release, 15 January 2018

146 Defence Committee, Eleventh Special Report of Session 2017–19, [Armed Forces Covenant Annual Report 2017: Government Response to the Committee’s Ninth Report of Session 2017–2019](#), HC 1571, pp 13-14

147 Ministry of Defence, UK Armed Forces Continuous Attitude Survey Results 2019, [Annex B](#), May 2019, table B19.7, B19.10, B19.13 and B19.16

were having a “direct effect on retention and the quality of life of our people”.<sup>148</sup> In the Ministerial evidence session, Rt Hon Tobias Ellwood MP, said that “The direction of travel is a positive one. The speed at which the change is taking place is not as good”.<sup>149</sup>

119. The MoD’s DIO Accommodation Customer Satisfaction Tracker undertakes monthly satisfaction surveys with customers living in SFA. The quarter 4 report found low satisfaction in two areas—the first being the way the contractor deals with repairs and maintenance issues. This saw 42% satisfied and 46% dissatisfied.<sup>150</sup> The other area was whether DIO Service Delivery (SD) Accommodation listens to customers views and acts upon them. In this case 39% were satisfied and 35% were dissatisfied.

120. The maintenance and repair contract with Amey expires in October 2019. On 20 September 2018, the MoD invited bids for the Future Defence Infrastructure Services (FDIS) contracts—five of which will be the replacement to the National Housing Prime (NHP) Contractor.<sup>151</sup> The allocation of bidders onto the framework was completed in February 2019 with the shortlisted group of suppliers competing for contracts.

121. Our 2017 Covenant report highlighted the deficiencies with the Amey contract, namely that it was short and very cheap, with families suffering as a result.<sup>152</sup> In its response to our report, the MoD said that the lessons learned from the experience of the NHP contract would be applied to the replacement contract under the FDIS programme.<sup>153</sup> This included the key performance indicators (KPI) being used to “incentivise suppliers to meet performance targets”.<sup>154</sup> We are encouraged that the MoD has consulted with a wide range of stakeholders in formulating its approach to the FDIS programme, including the Service Families Federations.<sup>155</sup>

122. At the Public Accounts Committee oral evidence session on Military Homes, on 8 May 2019, Graham Dalton, Chief Executive of DIO, said there would be three or four housing contracts rather than one UK-wide housing contract and this should “allow some competition by reputation”.<sup>156</sup>

**123. The poor record of satisfaction with repair and maintenance issues for Service Family Accommodation has been a failure of the National Housing Prime (NHP) contract as well as of Amey. The Department must learn lessons and ensure that contracts under the Future Defence Infrastructure Services (FDIS) programme have a customer-focused approach. We are encouraged that the Department has consulted the Service Families Federations and other stakeholders on rethinking its approach to contracting. The MoD should set out in detail its new approach to contracting under the FDIS programme and outline the lessons learned from the NHP which have been**

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148 Q71 [Sir John McColl]

149 Q183 [Mr Ellwood]

150 Ministry of Defence, [DIO Accommodation Customer Satisfaction Tracker Survey Q4 2018/19](#), May 2019, pp 7-8

151 Ministry of Defence, [press release](#), 20 September 2018

152 Defence Committee, Ninth Report of Session 2017–19, [Armed Forces Covenant Annual Report 2017](#), HC 707, para 80

153 Defence Committee, Eleventh Special Report of Session 2017–19, [Armed Forces Covenant Annual Report 2017: Government Response to the Committee’s Ninth Report of Session 2017–2019](#), HC 1571, p 14

154 Defence Committee, Eleventh Special Report of Session 2017–19, [Armed Forces Covenant Annual Report 2017: Government Response to the Committee’s Ninth Report of Session 2017–2019](#), HC 1571, pp 14-15

155 Defence Committee, Eleventh Special Report of Session 2017–19, [Armed Forces Covenant Annual Report 2017: Government Response to the Committee’s Ninth Report of Session 2017–2019](#), HC 1571, p 14

156 Oral evidence taken before the Public Accounts Committee on 22 May 2019 on Military homes, HC 2136, Q125



*incorporated into this new model, including robust Key Performance Indicators. We also expect an update and timetable on the award of new contracts under the FDIS programme and how the contracts are going to be actively managed.*

124. We are also very concerned with the low level of satisfaction with the Defence Infrastructure Organisation (DIO), specifically DIO Service Delivery (SD) Accommodation and their inability to listen to customer views and act upon them. More needs to be done to ascertain where and why the dysfunction within DIO exists. *In response to our report, the MoD should set out the actions it is taking to rectify the low satisfaction rate with the operation of DIO SD Accommodation and set out the steps planned to address these issues, which should include a timetable for completion and how improvements will be measured.*

### Ministry of Defence's agreement with Annington Property Limited

125. In 1996, the MoD entered into an agreement with Annington Property Limited (Annington) in which it sold the 999-year leases on approximately 55,000 housing units on its married quarters estate, as well as over 2,000 surplus properties.<sup>157</sup> It then rented them back on 200-year underleases from Annington with a guarantee of a 58% downward adjustment to open market rents on properties for the first 25 years of the contract.<sup>158</sup> The Department can terminate the agreement in whole or part (for each of the leases) by giving six months' notice and settling dilapidation claims.<sup>159</sup> A rent review is due to take place in 2021 on a site-by-site basis with any future downward adjustments to rent being the subject of negotiations. The downward adjustment of 58% will be maintained until new rent levels are applied across the estate between 2021 and 2024.<sup>160</sup>

126. A report on the MoD's arrangement with Annington by the National Audit Office in January 2018 revealed that the MoD would be between £2.2-£4.2 billion better off if it had retained the estate, due to rising house prices.<sup>161</sup> The NAO considered that the MoD had been too cautious in assuming that house prices would rise by only 1% per year (excluding inflation).<sup>162</sup> It also stated that the MoD committed to the deal requiring up to 200 years of rental payments in return for an upfront cash sum "having assessed that it would be cheaper to retain ownership".<sup>163</sup>

127. In a Public Accounts Committee evidence session on Military Homes it was revealed that the MoD had negotiated a deal with Annington on dilapidation fees (currently costing between £11,000 and £14,000 per property), which was now reduced to £7,000 on

157 National Audit Office, [Ministry of Defence's arrangement with Annington Property Limited](#), January 2018, HC 762, p 5

158 National Audit Office, [Ministry of Defence's arrangement with Annington Property Limited](#), January 2018, HC 762, p 5

159 National Audit Office, [Ministry of Defence's arrangement with Annington Property Limited](#), January 2018, HC 762, p 6

160 Oral evidence taken before the Public Accounts Committee on 22 May 2019 on [Military homes](#), HC 2136, Q25

161 National Audit Office, [Ministry of Defence's arrangement with Annington Property Limited](#), January 2018, HC 762, p 4

162 National Audit Office, [Ministry of Defence's arrangement with Annington Property Limited](#), January 2018, HC 762, p 7

163 National Audit Office, [Ministry of Defence's arrangement with Annington Property Limited](#), January 2018, HC 762, p 6

the condition that the MoD handed back a minimum of 500 properties per annum over a seven-year period.<sup>164</sup> The MoD can choose which of the properties handed back will benefit from this cap.

128. It was also revealed that the site review—which would have encompassed 488 separate sites over a three-year period between 2021 and 2024—would instead look at 27 sites<sup>165</sup> of which 20% of each site would be sampled.<sup>166</sup> The negotiation stage with Annington was scheduled to begin in September 2019.<sup>167</sup>

129. In the Ministerial oral evidence session, Mr Ellwood was asked whether those responsible for negotiating the Annington contract were held to account: he said it was a long time ago, but he would find out.<sup>168</sup> In supplementary written evidence, the MoD simply stated that all civil servants are accountable to their own line management chain, whilst responsibility for the project requirements rests with the Senior Reporting Officer. The MoD added:

The point was made during the evidence session that when this contract was originally signed it was considered a good deal, but subsequent unforeseeable changes to the housing market saw many advantages dissipate over time.<sup>169</sup>

There were however many critics of the deal at the time who were clear that it was defective. The Committee is deeply disappointed that the Civil Servants and Ministers responsible have not been held to account. This only further reinforces the public perception that there is no accountability for incompetence.

130. In response to our 2017 Covenant Annual Report and its criticism of the deal with Annington, the MoD stated that the investment appraisal system and guidance had been updated and improved and that the MoD recognised “that the public sector has a responsibility to ensure that the private sector partner does not enjoy all the gain from fortuitous market movements ... ”.<sup>170</sup>

### **Future Accommodation Model**

131. At the Public Accounts Committee, Lt General Richard Nugee, Chief of Defence People, made clear that the decision to implement the Future Accommodation Model (FAM) would depend on the findings of the pilots that are due to take place in HMNB Clyde in September 2019, Aldershot in January 2020 and RAF Wittering in May 2020,<sup>171</sup> as well as the result of the Annington Homes renegotiation.<sup>172</sup>

164 Oral evidence taken before the Public Accounts Committee on 22 May 2019 on [Military homes](#), HC 2136, Qq16-20

165 Oral evidence taken before the Public Accounts Committee on 22 May 2019 on [Military homes](#), HC 2136, Q21

166 Oral evidence taken before the Public Accounts Committee on 22 May 2019 on [Military homes](#), HC 2136, Qq43-44

167 Oral evidence taken before the Public Accounts Committee on 22 May 2019 on [Military homes](#), HC 2136, Q45

168 Q185 [Mr Ellwood]

169 Ministry of Defence ([CAR0020](#))

170 Defence Committee, Eleventh Special Report of Session 2017–19, [Armed Forces Covenant Annual Report 2017: Government Response to the Committee's Ninth Report of Session 2017–2019](#), HC 1571, p 15

171 Ministry of Defence, [Guidance](#), 1 April 2019

172 Oral evidence taken before the Public Accounts Committee on 22 May 2019 on [Military homes](#), HC 2136, Q78

132. The pilots for FAM were initially due to begin in December 2018. This date was postponed with an expectation to start in mid-2019;<sup>173</sup> however, the start date was delayed again. In the same evidence session, Lt General Nugee said that the delays were caused by a need to do more research to ensure that the first pilot was a success.<sup>174</sup> These delays, and the lack of clarity on what FAM means for Service personnel and their families, have led to a high degree of uncertainty.<sup>175</sup>

**133. The upcoming negotiations with Annington and the continual delays to implementing the Future Accommodation Model (FAM) pilots have left Service personnel and their families with a high degree of uncertainty. *In response to our report, we would like an update on progress in the Department's negotiations with Annington. We would also like to see the project objectives of the FAM pilots and details of the assessment criteria. A communication strategy should be established to ensure that Service families are regularly updated and informed on progress. This should include structured consultations with families throughout the process, so they can contribute to any findings and help shape the pilots as they develop.***

### Single Living Accommodation (SLA)

134. Annex B of AFCAS 2019 details the specific figures for SLA satisfaction. The tri-Service percentages for satisfaction were as follows:

- 52% for overall standard;
- 58% for value for money;
- 30% for response to requests for maintenance and repair; and
- 33% for the quality of maintenance and repair work.<sup>176</sup>

135. Like the figures for SFA, these show a slight improvement from 2018, but are still below levels recorded by AFCAS in 2014.<sup>177</sup> Concerns around the poor condition of current SLA stock were raised by the Service Families Federations in their joint observations for the 2018 Annual Report.<sup>178</sup> Maria Lyle from the RAF Families Federation believed that the governance, accountability and funding of SLA had a direct impact on morale and the ability to recruit and retain personnel in the future.<sup>179</sup>

136. In response to our concerns over SLA in the Covenant Annual Report 2017, the MoD said:

173 Oral evidence taken before the Public Accounts Committee on 22 May 2019 on [Military homes](#), HC 2136, Q163

174 Oral evidence taken before the Public Accounts Committee on 22 May 2019 on [Military homes](#), HC 2136, Q70

175 RAF Families Federation ([CAR0005](#))

176 Ministry of Defence, Armed Forces Continuous Attitude Survey Results 2019, [Annex B](#), May 2019, table B19.8, B19.11, B19.14 and B19.17

177 Ministry of Defence, [UK Armed Forces Continuous Attitude Survey Results 2019](#), 24 May 2019, p 19

178 Ministry of Defence, [Armed Forces Covenant Report 2018](#), 21 November 2018, p 19

179 Q35 [Maria Lyle]

... we have committed through the Defence Estate Optimisation Programme to invest £4 billion additional funding in Defence infrastructure over the next 10-15 years. This will result in an increase in new SLA bed-spaces and a significant SLA upgrade programme at our enduring sites.<sup>180</sup>

137. On 28 February 2019, the then Defence Secretary, Rt Hon Gavin Williamson MP, announced an update to the Defence Optimisation Programme with additional information about 33 military sites across the UK.<sup>181</sup> He also confirmed that £1.5 billion would be invested in the estate over the next five years.

138. Maria Lyle believed that the problem was not simply a lack of investment, but the “prioritisation for how further building takes place and how ageing infrastructure is maintained”.<sup>182</sup> She added that in some cases the funding had been delegated without those responsible for the funds having “the full levers to allow those owning those funds to introduce changes”.

139. From April 2018, the DIO began the process of delegating the funding for SLA to the separate Service Chiefs. Maria Lyle said she could understand why this devolution was happening, believing that “local commanders should have an understanding of where the money should go”.<sup>183</sup> General McColl of COBSEO, however, said this was just an exercise in off-loading responsibility from the MoD to the single Services. He believed that the central problem of underfunding needed to be addressed, “Frankly, we are just rearranging deckchairs on an underfunded Titanic”.<sup>184</sup>

**140. In our previous report, we said that the MoD needs to develop a robust plan to improve Single Living Accommodation (SLA). We are very disappointed that we are still hearing serious complaints about the condition of SLA, despite the injection of additional funding. We are further concerned to have received evidence that this situation is directly affecting morale and the ability to recruit and retain personnel. In response to our report, the MoD should outline urgent plans to improve SLA—plans which should not proceed until it is clear that the single Service Chiefs and their organisations have learnt from, and will not repeat past mistakes. We will also be asking the Comptroller and Auditor General to examine the provision of SLA in depth and in detail.**

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180 Defence Committee, Eleventh Special Report of Session 2017–19, *Armed Forces Covenant Annual Report 2017: Government Response to the Committee’s Ninth Report of Session 2017–2019*, HC 1571, p 17

181 Ministry of Defence, [press release](#), 28 February 2019

182 Q35 [Maria Lyle]

183 Q37 [Maria Lyle]

184 Q71 [Sir John McColl]

## 7 Through-life support

### Veterans Strategy

141. On 14 November 2018, the MoD launched the first ever UK-wide *Strategy for our Veterans*, a joint endeavour between the UK, Scottish and Welsh Governments, and the Northern Ireland Office. The Veterans Strategy sets out a number of principles and aims to continue to empower and support veterans over the next ten years. It also builds on existing efforts in Government to address the needs of veterans, including the Armed Forces Covenant, the Veterans Gateway and the Veterans ID card.

142. The Veterans Strategy focuses on six key areas in which support is most needed: community and relationships, employment and skills, health and wellbeing, finance and debt, housing and contact with the law.<sup>185</sup> Cross-cutting factors were also listed that affect the service provision for veterans across the six themes. These include:

- Collaboration between organisations;
- Coordination of veterans' services;
- Data on the veteran community;
- Public perception and understanding; and
- Recognition of veterans.<sup>186</sup>

143. The strategy was published alongside a consultation paper which sought public views on how the strategy should be implemented across the UK, except for devolved matters in Scotland and Wales. The consultation phase closed in February 2019, with the MoD receiving approximately 4,500 responses.<sup>187</sup> In oral evidence, General McColl of COBSEO highlighted the importance of the implementation plan borne out of the consultation phase:

It is quite easy to talk about policies and to produce policy documents. We are now finishing the consultation phase on the veterans' strategy and are about to move to the implementation plan. Whether it actually works, in terms of cross-Government co-ordination, will depend on whether the implementation plan has grit in it, and whether it delivers on the strategy.<sup>188</sup>

144. General McColl added that there would be issues that would require cross-Government cooperation and the allocation of resources: "I am very interested to see whether this will be embraced by the Government Departments and whether they will actually deliver on it".<sup>189</sup>

145. James Greenrod, Interim Head, Service Personnel Support, told us that a response to the consultation would be released later in 2019. He added that the 10-year strategy would

185 Ministry of Defence, *The Strategy for our Veterans*, Cm 9726, November 2018, p 5

186 Ministry of Defence, *The Strategy for our Veterans*, Cm 9726, November 2018, p 5

187 Q209 [Mr Ellwood]

188 Q51 [Sir John McColl]

189 Q90 [Sir John McColl]

have two-year rolling implementation plans guiding it: “What you will see later on in the year is the sense of how we will move that forward against the key themes and priority areas”.<sup>190</sup>

**146. We fully support the work of the Department in developing the Veterans Strategy. We look forward to seeing the outcomes of the consultation phase and the implementation plan. *In response to our report, the MoD should detail what the Office for Veterans’ Affairs will do to improve delivery of the Covenant, particularly through the implementation of the Veterans Strategy.***

### **War widows and widowers**

147. Listed in the 2018 Covenant Annual Report are the priorities for 2019 which included “Increased support for those who require special consideration, this includes War Widows and Widowers and the wider bereaved community”.<sup>191</sup> This is welcome as we remain concerned about the apparent lack of recognition and inclusion of war widows and widowers. They were not included within the development of the Veterans Strategy and only recently received their first specific mention (in the 2017 Covenant Report) as a recognised part of the Armed Forces community.

148. When discussing the Veterans Strategy, Mary Moreland, Chair of the War Widows Association, told us that “once again, war widows are ignored”<sup>192</sup> with “little talk about bereavement throughout the strategy”. She believed there should be an Armed Forces community strategy rather than one specifically for veterans. She stated that war widows and widowers should be recognised as a specific cohort within the category of “bereaved” along with research addressing the specific issues faced by this cohort.<sup>193</sup>

149. One issue of continuing concern for the War Widows Association—and for us—is the reinstatement of the War Widows’ Pension to those widows who had their War Widows’ Pension withdrawn. It was the original policy to withdraw survivors’ benefits in the event of remarriage or cohabitation.<sup>194</sup> In 2014, the then Prime Minister, David Cameron, made an announcement that the Government would allow those in receipt of a War Widows’ Pension to keep them for life regardless of any such change in their personal circumstances. However, a cohort of between 200-300 widows, who had remarried or cohabitated between 1973 and 2005, and had surrendered their War Widows Pension, still fell outside of this announcement.<sup>195</sup> The War Widows Association has been calling for the pension to be restored from 1 April 2015.<sup>196</sup>

150. Mary Moreland told us that she was still no further on in resolving the issue, despite having met with the then Chief Secretary to the Treasury, Rt Hon Elizabeth Truss MP, “who suggested that it was a fundamental injustice” and that “the finance was not a problem”.<sup>197</sup>

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190 Q210 [Mr Greenrod]

191 Ministry of Defence, [Armed Forces Covenant Report 2018](#), 21 November 2018, p 12

192 Q53 [Mary Moreland]

193 Q53 [Mary Moreland]

194 House of Commons Library, [War Widows Pensions](#), 16 November 2016, p 3

195 House of Commons Library, [War Widows Pensions](#), 16 November 2016, p 13

196 Q83 [Mary Moreland]

197 Q80 [Mary Moreland]

151. The then Minister for Defence People and Veterans, Rt Hon Tobias Ellwood MP, said the MoD recognised the “daftness” of the situation,<sup>198</sup> but argued it was not in the MoD’s gift to resolve: “it is for the Treasury to make that judgement, and we still await their reply”. He believed their reluctance to resolve the matter arose from concern that this decision would create a precedent: “I understand that if you honour this request—this commitment—other groups might then come forward requesting similar forms of compensation”.<sup>199</sup>

152. In Northern Ireland the widows and widowers of the Royal Ulster Constabulary (RUC) saw the reinstatement of their pension following a 2015 consultation.<sup>200</sup> This led to a situation in which widows of members of the RUC have had this issue resolved, whilst widows of Servicemen or women—who may have died in incidents alongside RUC personnel—have not.

**153. It is a positive step that one of the Covenant priorities for 2019 includes increased support for War Widows and Widowers, and the wider bereaved community. However, it is shameful and disgraceful that no progress has been made with the Treasury in addressing the reinstatement of the War Widows’ Pensions of the small cohort who fell outside the scope of the change of policy in 2014. We encourage the new Secretary of State for Defence to press this issue and engage urgently with the Treasury to resolve this matter. It has remained unresolved for far too long and, in response to our Report, the Government should set out a firm and final timetable for rectifying this injustice.**

## Veterans Gateway

154. The Veterans Gateway is intended to be the first point of contact for veterans and their families seeking advice and support on a wide range of issues, including healthcare, housing, finances, employability and personal relationships. It was formally launched in June 2017, as a Covenant-funded initiative managed by a Royal British Legion-led consortium consisting of Armed Forces charities and supported by specialist referral partners.

155. Annex A of the written evidence submitted by the Ministry of Defence revealed that in January 2019 the top three areas of need sought by veterans and their families were finances, accommodation and mental wellbeing.<sup>201</sup> Written evidence from Northumbria and Chester University suggests that financial hardship and housing issues are the most prevalent topics affecting veterans seeking assistance from the main charities.<sup>202</sup> In oral evidence, General McColl of COBSEO, said he wanted to see a more holistic transition for ex-Service personnel that looks beyond career transition and includes consideration of housing.<sup>203</sup>

156. The Covenant Annual Report 2018 stated that a new Defence Holistic Transition policy would be introduced in late 2018. This new policy is intended to expand the focus of support offered to Service Leavers beyond employment, “to support holistic and life changing processes such as resettlement, health and wellbeing, welfare, housing advice

198 Q128 [Mr Ellwood]

199 Q127 [Mr Ellwood]

200 Department of Finance NI, [Employee Pension Notice](#), March 2016

201 Ministry of Defence ([CAR0016](#))

202 Northumbria and Chester University ([CAR0001](#))

203 Q71 [Sir John McColl]

and financial information”.<sup>204</sup> However, the policy was not introduced and has been continually delayed. In oral evidence, James Greenrod explained that the delay was necessary “to take the time to get it right; so it is not going to be a long delay”.<sup>205</sup> He added that the policy should be delivered in summer 2019, a deadline that has now passed.<sup>206</sup>

157. In oral evidence with the Service charities, concerns were raised regarding the continuity of funding for the Veterans Gateway. Charles Byrne from the Royal British Legion said:

There is an as yet unresolved question about funding: the Legion has committed a certain amount of funding, and the Government and the MoD have recently committed more, but it is not a permanent solution. There is a degree of uncertainty that sits around that, and we are continuing to work with it, but at the moment the Legion is committed to running the Veterans Gateway with what funding we can.<sup>207</sup>

158. The then Minister for Defence People and Veterans, Rt Hon Tobias Ellwood MP, told us he wanted to encourage charities to move towards the Veterans Gateway to avoid duplication in call centres and enable the Gateway to be seen as the single point of contact for veterans, “which then provides an efficiency in savings, and allows that important financial continuity and security that they need”.<sup>208</sup>

159. On 21 January, the MoD announced that the Veterans Gateway would now begin a new trial of proactive calls to ex-Service personnel.<sup>209</sup> This outreach service would contact “the most vulnerable” ex-Service personnel who had previously been in contact asking for support. Veterans can decide how often they hear from the Gateway and would receive calls from the same advisor.

**160. The Veterans Gateway is a crucial resource for veterans and their families who are seeking advice and support on a wide range of issues. It is also a key source of data for understanding the needs of the veteran community. It was therefore alarming to hear that there is an unresolved issue over the future financial sustainability of the Gateway. In response to our report, the MoD should set out its plans for future funding, which should include detailed consultation with the Service charities sector and an update in the next Covenant Annual Report.**

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204 Ministry of Defence, [Armed Forces Covenant Report 2018](#), 21 November 2018, p 12

205 Q214 [Mr Greenrod]

206 Q215 [Mr Greenrod]

207 Q60 [Mr Byrne]

208 Q212 [Mr Ellwood]

209 Ministry of Defence, [press release](#), 21 January 2019



## 8 The Covenant in Business and the Community

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### The Covenant in Business

161. Under the Armed Forces Covenant, businesses can sign voluntary pledges to demonstrate their support for the Armed Forces community. This can include employment support for veterans, reservists, Service spouses and partners, as well as support for cadet units, Armed Forces Day, and discounts for the Armed Forces community. As organisations vary considerably in size and available resources, businesses are encouraged to tailor their pledges in the way most suitable to their situation and capacity. According to the 2018 Covenant Annual Report, the Covenant has been signed by over 3,000 companies.<sup>210</sup>

162. Organisations that advocate support for the Armed Forces community are publicly recognised through the Employer Recognition Scheme awards, including bronze, silver and gold awards. In 2018 a ‘Menu of benefits’ was introduced for winners, including discounts for corporate hospitality venues, military leadership courses for staff and networking opportunities.

163. On 22 January 2019, the Forces in Mind Trust launched its report into the delivery of organisational pledges, *Benefit not Burden: How to improve the delivery of organisational pledges made under the Armed Forces Covenant*.<sup>211</sup> Recommendations from the report include a “suite of toolkits” aimed at different sectors and different-sized organisations to help them understand what actions they might take to contribute to the delivery of the Covenant. The report also recommended more research on the impact pledges are having on the Armed Forces community, rather than only focusing on outputs.<sup>212</sup>

164. The MoD’s written evidence said:

The Covenant Team and the Cabinet Office are discussing how to take this work forward. The preferred option will be to adopt a similar approach to the response to the Our Community Our Covenant report. This involved the creation of a cross-government working group, involving key stakeholders, to ensure the focus is not just on defence, but realising the potential of the Covenant through Her Majesty’s Government’s supply chain.<sup>213</sup>

165. There were concerns that organisations which sign up to the Covenant might not treat it as a meaningful commitment, since it was not clear what was expected from them. Written evidence from Northumbria and Chester University said that the Armed Forces Covenant should be much clearer “with regards what is expected of organisations which sign up, and that they are delivering on those expectations”.<sup>214</sup> They continued:

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210 Ministry of Defence, *Armed Forces Covenant Report 2018*, 21 November 2018, p 106

211 Forces in Mind Trust, *Benefit not Burden: How to improve the delivery of organisational pledges made under the Armed Forces Covenant*, January 2019

212 Forces in Mind Trust, *Benefit not Burden: How to improve the delivery of organisational pledges made under the Armed Forces Covenant*, January 2019, p 8

213 Ministry of Defence ([CAR0016](#))

214 Northumbria and Chester University ([CAR0001](#))

Failure to do so means that the sign-up process becomes no more than a tick box exercise, that delivers nothing of substance to the Armed Forces community.

166. In its observations for the Covenant Annual Report 2018, the Royal British Legion said that it would like to see guidelines to help support organisations in the delivery of their pledges.<sup>215</sup>

167. In the Covenant 2018 Report, the MoD stated that in consultation with business, it is working on introducing key performance indicators to help “determine what constitutes positive employment support to the Armed Forces community”.<sup>216</sup>

**168. We recognise as a success the large number of businesses signing up to the Covenant; but we are concerned that there are no clear guidelines for such firms on how to implement their pledges. We agree with the Forces in Mind Trust report that the MoD should produce a “suite of toolkits” for organisations of difference sizes and sectors to help them implement their commitments to the Covenant. We also agree that the MoD should commission research into the impact of organisational pledges on the Armed Forces community. An update on the “suite of toolkits” and the research into organisational pledges should be included in the next Covenant Annual Report.**

## Community Covenant

169. The Community Covenant encourages local authorities and the local community to support the Armed Forces community through understanding and awareness. Every local authority in Great Britain has signed the Community Covenant, with many allocating an Armed Forces Champion responsibility for implementing and supporting the aims of the Covenant, as well as providing a point of contact within the organisation.

170. A Forces in Mind Trust and MoD-led Covenant Community Action Group was created to take forward the recommendations of the 2016 report *Our Community, our Covenant*<sup>217</sup> leading to the publication of *A Guide for Local Authorities: How to deliver the Covenant in your area*.<sup>218</sup> In the MoD’s response to our 2017 Covenant Annual Report, it was stated that the structure of this Action Group had been formalised and had widened its membership to include representatives from the devolved administrations, Scottish and Welsh Local Government Associations and charitable sectors.<sup>219</sup>

171. However, in their observations for the 2018 Covenant Annual Report, all the charities commented on the lack of consistency and the need for improved coordination in the delivery of the Covenant across local authorities. The Royal British Legion stated that there was “still considerable inconsistency in delivery”.<sup>220</sup> The Service Families Federations

215 Ministry of Defence, [Armed Forces Covenant Report 2018](#), 21 November 2018, p 24

216 Ministry of Defence, [Armed Forces Covenant Report 2018](#), 21 November 2018, p 120

217 Forces in Mind Trust/Local Government Association, [Our Community, Our Covenant: Improving the delivery of local Covenant pledges](#), 31 August 2016

218 Ministry of Defence, [A Guide for Local Authorities: How to deliver the Covenant in your area](#), 27 October 2017

219 Defence Committee, Eleventh Special Report of Session 2017–19, [Armed Forces Covenant Annual Report 2017: Government Response to the Committee’s Ninth Report of Session 2017–2019](#), HC 1571, p 24

220 Ministry of Defence, [Armed Forces Covenant Report 2018](#), 21 November 2018, p 24

highlighted the diversity in the approach and delivery of the Covenant and would “welcome further ways of ensuring that those local authorities who require additional assistance are given the guidance needed”.<sup>221</sup>

172. In oral evidence, Louise Simpson from the Army Families Federation recognised that devolved localism was a challenge in ensuring consistency across local authorities.<sup>222</sup> Maria Lyle from the RAF Families Federation saw the promotion of a “best practice kitemark” as one way to address it.<sup>223</sup> Anna Wright from the Naval Families Federation highlighted the positive role of project officers related to Covenant funding who are embedded in local authorities: “That makes a massive difference. It really injects some enthusiasm and motivation and has a huge impact. For me, that is a big thing”.<sup>224</sup>

173. The importance of individuals within local authorities promoting the values of the Covenant was explored in oral evidence by Charles Byrne from the Royal British Legion:

... even if you get the framework in place, you then get a churn of people, and it seems to come down to will—political and financial—to deliver on that. I think that the framework would help, and “Our Community—Our Covenant” lays that out. It is then just about trying to get a consistency of will.<sup>225</sup>

174. In written evidence, the Local Government Association (LGA) highlighted the funding challenges faced by local authorities. It said that councils face an overall funding gap of almost £8bn by 2025, “just to maintain services at current levels”.<sup>226</sup> In 2016/17 and 2017/18, local government received priority funding from the Covenant Fund Trust, which awarded £6.6m in grants over the two years.<sup>227</sup> A report commissioned by LGA stated that the Trust awarded 17 large grants to local authorities in England in 2016/17 with the funding for the majority of these due to complete by the end of this year.<sup>228</sup> LGA stated that “The Government needs to continue this funding if councils are to maintain and build on the current level of support for veterans and other people in vulnerable circumstances”.<sup>229</sup> As of 2018/19, local government no longer received priority funding from the Trust, although they remain able to apply for other Covenant Fund Trust schemes.

175. The then Minister for Defence People and Veterans, Rt Hon Tobias Ellwood MP, told us that “There is a challenge on all levels of funding”,<sup>230</sup> and added: “It is expected, because they have signed the Armed Forces Covenant, that the local authorities do continue their commitment towards it as best they can”.

**176. We are disappointed still to be hearing about significant disparities in local authorities’ delivery of, and engagement with, the Covenant. We recognise that the Covenant principles will be shaped by local circumstances; however, there must be assurance that local authorities are supporting the needs of the Armed Forces**

221 Ministry of Defence, *Armed Forces Covenant Report 2018*, 21 November 2018, p 20

222 Q48 [Louise Simpson]

223 Q48 [Maria Lyle]

224 Q48 [Anna Wright]

225 Q94 [Mr Byrne]

226 Local Government Association ([CAR0006](#))

227 Local Government Association, [26 June 2019](#)

228 Shared Intelligence, *Delivering the Armed Forces Covenant Locally: Case studies and key lessons from Covenant Fund Grants in 10 council areas*, May 2019, p 1

229 Local Government Association ([CAR0006](#))

230 Q216 [Mr Ellwood]

**community. *In response to our report, the MoD must show that it has an effective system both for identifying local authorities that are less effective in Covenant delivery and for improving standards of good practice across the UK.***

**177. Written evidence from the Local Government Association expressed concern that local authorities would not be able to maintain the current level of support for veterans when priority Covenant grants awarded in 2016/17 and 2017/18 come to an end. *In response to our report, the MoD should ensure that veterans will not experience a decline in the current level of support.***

## Conclusions and recommendations

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### Governance and metrics

1. We welcome the establishment of the Office for Veterans' Affairs and the shared responsibility between MoD and the Cabinet Office. We are, however, keen to see a balance in the implementation of the Covenant between the needs of veterans and those of serving personnel. It is important that the Office makes a real difference and does not add another layer of bureaucracy to the delivery of the Covenant. *In response to our report, the Government should set out how this Office will operate across MoD and the Cabinet Office, including the role of the Office within the broader Covenant governance structure, the role of each Minister, the long-term vision for the Office, the funding that will be made available to it, and the approach it will take to ensure a coordinated and consistent level of service is provided across Whitehall to veterans.* (Paragraph 13)
2. We are concerned that the collapse of the Executive in Northern Ireland has impeded full engagement with, and implementation of, Covenant principles within Northern Ireland, thus creating a disparity with other parts of the UK. We welcome the duty placed on the Secretary of State to report on the progress of preparing legislation confirming the application of the Covenant in the provision of public services in Northern Ireland. *The Government should also consider amending the guidance provided by the Northern Ireland Office to the Northern Ireland Civil Service, under the Northern Ireland (Executive Formation and Exercise of Functions) Act 2018, to ensure that, in the absence of a devolved Executive in Northern Ireland, a representative from the Northern Ireland Civil Service attends meetings of the Veterans Board.* (Paragraph 20)
3. We are disappointed that the situation in Northern Ireland has delayed full membership on the Veterans Board for the Scottish and Welsh devolved administrations. We note that the MoD believes this has not affected their working relationship with the devolved administrations, but we are concerned about the message this sends. *The MoD should give full membership to the Scottish and Welsh Governments immediately. It should also explain its reasoning for withholding full membership to date, which should include any negative implications of granting full membership that have been identified.* (Paragraph 21)
4. We were pleased to hear the positive feedback from Service charities regarding the transition to the Covenant Fund Trust. We welcome the Fund's new independent status, the involvement of representatives from the Service charities as trustees for the Fund and the additional funding for Veterans' Mental Health and Wellbeing needs. However, with the introduction of additional funding beyond the core £10 million fund, we are concerned that the appropriate safeguards may not be in place to ensure that operational costs are kept to a minimum. (Paragraph 28)
5. *In response to our report, the MoD should provide details of any other funds it expects to channel through the Covenant Fund Trust and the safeguards being put in place to ensure that running costs are kept to a minimum. This should include any planned increases and how the cost will be shared amongst the funds.* (Paragraph 29)

6. We are pleased with the progress in developing an Outcomes Measurement Framework for Covenant funding that will help ensure maximum impact for the Armed Forces community. We are also encouraged by the MoD's commitment to share data on the disparity of Covenant delivery at the local level in comparison with the general population later this year. (Paragraph 36)
7. It is important that identifying disadvantage in the Armed Forces community and measuring the delivery of Covenant initiatives are based on accurate data. The Department should also use current forms of data gathering more effectively. This includes the information captured by Service family surveys such as FAMCAS which reflects modern family structures. *We therefore expect the MoD to review current data-gathering tools across Covenant themes to identify gaps and ways of capturing data using new and existing tools. The results of this review should be shared with the Committee.* (Paragraph 37)

### Family life

8. We are very concerned with the treatment of Commonwealth Service personnel and their families which the Army Families Federation has described as "immoral". There has been a failure adequately to acknowledge the contribution these individuals and their families make to the defence and security of the UK. We recognise that the issue of Minimum Income Threshold (MIT), visa fees and Indefinite Leave to Remain (ILR) are Home Office policies; but the MoD must do more to record relevant family data, in order that the extent of the problem across the Armed Forces can be fully understood. The MoD must ensure that the financial requirements laid upon personnel and their families when moving to the UK are effectively communicated at the point of recruitment. It must also ensure that high quality advice and guidance is available to those currently serving. *The MoD must ensure that the financial requirements laid upon personnel and their families when moving to the UK are effectively communicated at the point of recruitment. It must also ensure that high quality advice and guidance is available to those currently serving.* (Paragraph 53)
9. *In response to our report the MoD should set out its plans for improving its collection of the relevant family data of serving personnel. It should also set out in detail an improved communication strategy to fully inform non-UK personnel, who are both serving and at the early stage of the recruitment process, about the financial requirements for dependants to be able to join them in the UK. We encourage the new Defence Secretary to continue discussions with the Home Office in order to resolve this issue quickly.* (Paragraph 54)
10. We welcome MoD initiatives to modernise Armed Forces employment. However, we are concerned that the MoD is not adapting access to its support mechanisms to accommodate the effects of these changes. Dispersed families are reporting that the distance from the parent unit creates barriers to available support. Given that the number of dispersed families appears to be growing, the MoD must ensure that these families are not disadvantaged in their access to support services. Addressing these issues will be vital if the Future Accommodation Model (FAM) is to succeed. (Paragraph 61)

11. *In response to our report the MoD should clarify what data it has on the number of dispersed families within the Armed Forces. It should take steps to ensure that dispersed families are aware of and have access to support services. The MoD should also continue to monitor whether its flexible working initiative has a positive impact on dispersed families. (Paragraph 62)*

## Education

12. We are concerned that the mobile lifestyle expected of Service personnel may disadvantage their children. Data in the Armed Forces Covenant Report 2018 suggested that a career in the Armed Forces may negatively affect Service children's attainment levels since they have to move schools often. The challenge of finding and securing a suitable school, especially at critical stages of a child's education or for those who have special educational needs or disabilities, is understandably a "key source of anxiety for Service families". (Paragraph 74)
13. *We agree with the recommendation made by the Service Children's Progression (SCiP) Alliance that a coherent Government approach should be developed to track the number and location of Service children across the UK and internationally which can be shared with researchers seeking to understand the causal relationship between the mobility of Service life and the effect on educational attainment. The Department should also set out the steps it has taken in coordination with the Department for Education and local authorities around the UK to improve the admissions process for Service children, especially those with special educational needs, so they are not disadvantaged. This should include an update on the review into the provisions for Service children in the School Admissions Code. (Paragraph 75)*
14. There is evidence that children from Service families are disadvantaged in accessing higher education compared to the general population: this is unacceptable. *In response to our report, the MoD should set out in detail what actions it is taking both unilaterally and in coordination with the Department for Education to address this disadvantage. This should include plans to collect data on Service children post-16. Data and analysis of this cohort should be included in future Covenant Annual Reports. (Paragraph 78)*
15. We welcome the MoD's extension of the Education Support Fund and its guidance for schools on how to spend Service Pupil Premium effectively. However, we would like to see more examples of best practice which include schools with low numbers of Service children—the majority of schools receiving Service Pupil Premium. *In response to our report, the MoD should provide additional guidance and case studies of best practice for schools with low numbers of Service children. These examples should be circulated to all schools with Service children and made easily accessible to Service families. (Paragraph 89)*
16. We commend the publication of the 'Welcome to' packs for families moving between devolved administrations. However, we are concerned that the key information contained in these documents is not reaching Service families. We are also concerned at the lack of data from devolved administrations about Service children presented in the Covenant Annual Report. *In response to our report, the MoD, in coordination with the devolved administrations, should improve its outreach processes to Service*

*families to ensure that they are fully informed of differences in the way support is provided for Service children across the devolved administrations. The MoD should ensure data from the devolved administrations is collected and incorporated into future Covenant Annual Reports. (Paragraph 90)*

## Healthcare

17. We are concerned that we are still hearing about continuing difficulties in understanding and implementing veteran priority access to NHS medical treatment when injuries or ill-health are attributable to their military service. There continues to be confusion within Government as to how priority treatment should be implemented. We conclude that the only way to give priority to veterans is to establish dedicated NHS pathways and facilities for veterans. Otherwise, there will continue to be an understandable reluctance within the NHS for anyone to receive priority treatment on the basis of anything other than current clinical need. (Paragraph 97)
18. *We call for an update on the Department's work with the Department of Health and Social Care and the devolved administrations to develop a clear definition of priority treatment for veterans and practical steps to ensure veterans with Service attributable conditions have clinical priority. We expect this work to be taken forward urgently and in their response the Government should include a timeline for its completion. (Paragraph 98)*
19. The disruption of care pathways for families of serving personnel who are relocated is a clear disadvantage and is contrary to the values of the Covenant. This will affect retention in the Armed Forces, especially of families with complex medical needs. This issue must be addressed if the Armed Forces is to be an attractive employer. (Paragraph 104)
20. *The MoD must establish an effective system in coordination with NHS England, the devolved administration and local authorities to ensure that Service families receiving ongoing care are provided with equivalent support when re-located. (Paragraph 105)*
21. We welcome the work of the MoD in coordination with health departments in the UK on the introduction of veteran-specific specialist mental health services. However, we repeat the recommendation made in our report *Mental Health and the Armed Forces, Part Two: The Provision of Care* that a National Mental Health Residential Rehabilitation Centre that is exclusively for either serving or ex-serving personnel should be established and co-located with the new state-run Defence and National Rehabilitation Centre (DNRC) for physically injured serving personnel at Stanford Hall. *Mental Health and the Armed Forces, Part Two: The Provision of Care* that a National Mental Health Residential Rehabilitation Centre that is exclusively for either serving or ex-serving personnel should be established and co-located with the new state-run Defence and National Rehabilitation Centre (DNRC) for physically injured serving personnel at Stanford Hall. *In response to our report, the MoD should update us on any consultations, so far, between the Department, the NHS and DNRC on establishing this vital facility, and on the timeline proposed for doing so. (Paragraph 112)*



## Accommodation

22. The poor record of satisfaction with repair and maintenance issues for Service Family Accommodation has been a failure of the National Housing Prime (NHP) contract as well as of Amey. The Department must learn lessons and ensure that contracts under the Future Defence Infrastructure Services (FDIS) programme have a customer-focused approach. We are encouraged that the Department has consulted the Service Families Federations and other stakeholders on rethinking its approach to contracting. *The MoD should set out in detail its new approach to contracting under the FDIS programme and outline the lessons learned from the NHP which have been incorporated into this new model, including robust Key Performance Indicators. We also expect an update and timetable on the award of new contracts under the FDIS programme and how the contracts are going to be actively managed.* (Paragraph 123)
23. We are also very concerned with the low level of satisfaction with the Defence Infrastructure Organisation (DIO), specifically DIO Service Delivery (SD) Accommodation and their inability to listen to customer views and act upon them. More needs to be done to ascertain where and why the dysfunction within DIO exists. *In response to our report, the MoD should set out the actions it is taking to rectify the low satisfaction rate with the operation of DIO SD Accommodation and set out the steps planned to address these issues, which should include a timetable for completion and how improvements will be measured.* (Paragraph 124)
24. The upcoming negotiations with Annington and the continual delays to implementing the Future Accommodation Model (FAM) pilots have left Service personnel and their families with a high degree of uncertainty. *In response to our report, we would like an update on progress in the Department's negotiations with Annington. We would also like to see the project objectives of the FAM pilots and details of the assessment criteria. A communication strategy should be established to ensure that Service families are regularly updated and informed on progress. This should include structured consultations with families throughout the process, so they can contribute to any findings and help shape the pilots as they develop.* (Paragraph 133)
25. In our previous report, we said that the MoD needs to develop a robust plan to improve Single Living Accommodation (SLA). We are very disappointed that we are still hearing serious complaints about the condition of SLA, despite the injection of additional funding. We are further concerned to have received evidence that this situation is directly affecting morale and the ability to recruit and retain personnel. *In response to our report, the MoD should outline urgent plans to improve SLA—plans which should not proceed until it is clear that the single Service Chiefs and their organisations have learnt from, and will not repeat past mistakes. We will also be asking the Comptroller and Auditor General to examine the provision of SLA in depth and in detail.* (Paragraph 140)

### Through-life support

26. We fully support the work of the Department in developing the Veterans Strategy. We look forward to seeing the outcomes of the consultation phase and the implementation plan. *In response to our report, the MoD should detail what the Office for Veterans' Affairs will do to improve delivery of the Covenant, particularly through the implementation of the Veterans Strategy.* (Paragraph 146)
27. It is a positive step that one of the Covenant priorities for 2019 includes increased support for War Widows and Widowers, and the wider bereaved community. However, it is shameful and disgraceful that no progress has been made with the Treasury in addressing the reinstatement of the War Widows' Pensions of the small cohort who fell outside the scope of the change of policy in 2014. We encourage the new Secretary of State for Defence to press this issue and engage urgently with the Treasury to resolve this matter. *We encourage the new Secretary of State for Defence to press this issue and engage urgently with the Treasury to resolve this matter. It has remained unresolved for far too long and, in response to our Report, the Government should set out a firm and final timetable for rectifying this injustice.* (Paragraph 153)
28. The Veterans Gateway is a crucial resource for veterans and their families who are seeking advice and support on a wide range of issues. It is also a key source of data for understanding the needs of the veteran community. It was therefore alarming to hear that there is an unresolved issue over the future financial sustainability of the Gateway. *In response to our report, the MoD should set out its plans for future funding, which should include detailed consultation with the Service charities sector and an update in the next Covenant Annual Report.* (Paragraph 160)

### The Covenant in Business and the Community

29. We recognise as a success the large number of businesses signing up to the Covenant; but we are concerned that there are no clear guidelines for such firms on how to implement their pledges. *We agree with the Forces in Mind Trust report that the MoD should produce a "suite of toolkits" for organisations of difference sizes and sectors to help them implement their commitments to the Covenant. We also agree that the MoD should commission research into the impact of organisational pledges on the Armed Forces community. An update on the "suite of toolkits" and the research into organisational pledges should be included in the next Covenant Annual Report.* (Paragraph 168)
30. We are disappointed still to be hearing about significant disparities in local authorities' delivery of, and engagement with, the Covenant. We recognise that the Covenant principles will be shaped by local circumstances; however, there must be assurance that local authorities are supporting the needs of the Armed Forces community. *In response to our report, the MoD must show that it has an effective system both for identifying local authorities that are less effective in Covenant delivery and for improving standards of good practice across the UK.* (Paragraph 176)
31. Written evidence from the Local Government Association expressed concern that local authorities would not be able to maintain the current level of support

for veterans when priority Covenant grants awarded in 2016/17 and 2017/18 come to an end. *In response to our report, the MoD should ensure that veterans will not experience a decline in the current level of support.* (Paragraph 177)

## Formal minutes

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### Monday 9 September 2019

Members present

Rt Hon Dr Julian Lewis, in the Chair

Martin Docherty-Hughes	Gavin Robinson
Rt Hon Mr Mark Francois	Ruth Smeeth
Graham P Jones	Rt Hon John Spellar

Draft Report (*Armed Forces Covenant Annual Report 2018*), proposed by the Chair, brought up and read.

*Ordered*, That the draft Report be read a second time, paragraph by paragraph.

Paragraphs 1 to 177 read and agreed to.

Summary agreed to.

*Resolved*, That the Report be the Eighteenth Report of the Committee to the House.

*Ordered*, That the Chair make the Report to the House.

[Adjourned till Tuesday 15 October at 1.30pm]

## Witnesses

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The following witnesses gave evidence. Transcripts can be viewed on the [inquiry publications page](#) of the Committee's website.

### Tuesday 12 February 2019

**Anna Wright**, Chief Executive, Naval Families Federation, **Maria Lyle**, Director, RAF Families Federation, **Louise Simpson**, Policy and Research Director, Army Families Federation

[Q1–49](#)

**Mary Moreland**, Chairman, War Widows Association, **Charles Byrne**, Director General, Royal British Legion, **General (Rtd) Sir John McColl KCB CBE DSO**, Chairman, COBSEO

[Q50–98](#)

### Tuesday 19 March 2019

**Rt Hon Tobias Ellwood MP**, Minister for Defence People and Veterans, **James Greenrod**, Interim Head, Service Personnel Support, Ministry of Defence

[Q99–218](#)

## Published written evidence

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The following written evidence was received and can be viewed on the [inquiry publications page](#) of the Committee's website.

CAR numbers are generated by the evidence processing system and so may not be complete.

- 1 Airbus ([CAR0010](#))
- 2 Anglia Ruskin University ([CAR0013](#))
- 3 Army Families Federation ([CAR0003](#))
- 4 Army Families Federation ([CAR0017](#))
- 5 Child Soldiers International ([CAR0012](#))
- 6 Home Office ([CAR0022](#))
- 7 Jeff Spencer ([CAR0015](#))
- 8 Local Government Association ([CAR0006](#))
- 9 Ministry of Defence ([CAR0016](#))
- 10 Ministry of Defence ([CAR0020](#))
- 11 Ministry of Defence ([CAR0021](#))
- 12 Naval Families Federation ([CAR0011](#))
- 13 Naval Families Federation ([CAR0018](#))
- 14 Northern Ireland Civil Service ([CAR0023](#))
- 15 Northumbria University and Chester University ([CAR0001](#))
- 16 RAF Association ([CAR0004](#))
- 17 RAF Families Federation ([CAR0005](#))
- 18 RAF Families Federation ([CAR0019](#))
- 19 The Royal British Legion ([CAR0007](#))
- 20 Royal Caledonian Education Trust ([CAR0014](#))
- 21 Scottish Veterans Commissioner ([CAR0008](#))
- 22 Service Children's Progression Alliance ([CAR0002](#))

## List of Reports from the Committee during the current Parliament

All publications from the Committee are available on the [publications page](#) of the Committee's website. The reference number of the Government's response to each Report is printed in brackets after the HC printing number.

### Session 2017–19

First Report	Gambling on 'Efficiency': Defence Acquisition and Procurement	HC 431 (HC 846)
Second Report	Unclear for take-off? F-35 Procurement	HC 326 (HC 845)
Third Report	Sunset for the Royal Marines? The Royal Marines and UK amphibious capability	HC 622 (HC 1044)
Fourth Report	Rash or Rational? North Korea and the threat it poses	HC 327 (HC 1155)
Fifth Report	Lost in Translation? Afghan Interpreters and Other Locally Employed Civilians	HC 572 (HC 1568)
Sixth Report	The Government's proposals for a future security partnership with the European Union	HC 594 (HC 1570)
Seventh Report	Beyond 2 per cent: A preliminary report on the Modernising Defence Programme	HC 818 (HC 1994)
Eighth Report	Indispensable allies: US, NATO and UK Defence relations	HC 387 (HC 1569)
Ninth Report	Armed Forces Covenant Annual Report 2017	HC 707 (HC 1571)
Tenth Report	UK arms exports during 2016	HC 666 (HC 1789)
Eleventh Report	Armed Forces and veterans mental health	HC 813 (HC 1635)
Twelfth Report	On Thin Ice: UK Defence in the Arctic	HC 388 (HC 1659)
Thirteenth Report	Future Anti-Ship Missile Systems: Joint inquiry with the Assemblée nationale's Standing Committee on National Defence and the Armed Forces	HC 1071 (HC 2033)
Fourteenth Report	Mental Health and the Armed Forces, Part Two: The Provision of Care	HC 1481 (HC 2213)
Fifteenth Report	Missile Misdemeanours: Russia and the INF Treaty	HC 1734 (HC 2464)
Sixteenth Report	Fairness without Fear: The work of the Service Complaints Ombudsman	HC 1899
Seventeenth Report	Drawing a line: Protecting veterans by a Statute of Limitations	HC 1224
First Special Report	SDSR 2015 and the Army	HC 311

Second Special Report	Armed Forces Covenant Annual Report 2016	HC 310
Third Special Report	Investigations into fatalities in Northern Ireland involving British military personnel: Government Response to the Committee's Seventh Report of Session 2016–17	HC 549
Fourth Special Report	Gambling on 'Efficiency': Defence Acquisition and Procurement: Government Response to the Committee's First Report	HC 846
Fifth Special Report	Unclear for take-off? F-35 Procurement: Responses to the Committee's Second Report	HC 845
Sixth Special Report	Sunset for the Royal Marines? The Royal Marines and UK amphibious capability: Government Response to the Committee's Third Report	HC 1044
Seventh Special Report	Rash or Rational? North Korea and the threat it poses: Government Response to the Committee's Fourth Report	HC 1155
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