

**The Nation's Commitment to the Armed Forces Community:  
Consistent and Enduring Support**

**A Summary of Consultation Responses**

**February 2010**

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# Chapter 1

## Introduction

1.1 In July 2008, the Ministry of Defence (MOD) published Command Paper 7424, 'The Nation's Commitment: Cross Government Support to our Armed Forces, their Families and Veterans'. It was the first cross Government strategy to improve the level of support given to serving personnel, their families and veterans. The strategy aimed to counter any disadvantages incurred by service in the Armed Forces; for example to ensure that public services such as education and healthcare were not disrupted by the mobile nature of Service life. The paper therefore set out a number of practical measures to support the Armed Forces community including healthcare provision, education and skills, accommodation and employment opportunities. The first Annual Report outlining significant progress against the Command Paper commitments was published in November 2009.

1.2 The MOD published the Consultation Paper: 'The Nation's Commitment to the Armed Forces Community: Consistent and Enduring Support' in July 2009. This marked the start of a public consultation on how to embed the principle of no disadvantage for the Armed Forces. The paper highlighted eight options for consideration. The options focussed on two strands; the first explored how to secure consistent and enduring support and the second outlined a number of possible routes of recourse. The consultation period ran from 16 July to 31 October 2009 and a total of 84 responses were received.

<b>Respondent<sup>1</sup></b>	<b>Breakdown</b>	<b>Total</b>
Service Charity		4
Service Families Federation		1
Other Third Sector Organisation		3
Local Government	England	9
	Scotland	6
	Wales	1
	NHS England	5
	NHS Scotland	1
	NHS Wales	1
Central Government	Government Departments	3
	Official Military Responses	7
Devolved Administrations	Scottish Executive	1
	Welsh Assembly Government	1
Interest Group		3
Member of the Public	Serving Military Personnel	18
	Service Family	4
	Veteran or Retired	3
	Other	4
Large Company		1
Other		8
<b>TOTAL</b>		<b>84</b>

1.3 In addition, a number of events were held throughout the consultation period. These included seminars with Local Government Authorities in England and Wales;

<sup>1</sup> As the respondents defined themselves in the Consultation Questionnaire

meetings with the Devolved Administrations and Central Government Departments; and Focus Groups for Service Families. The output from these events is also reflected in this response. Around a quarter of respondents did not answer the consultation questionnaire but took the opportunity to comment on wider Service Personnel issues such as education, healthcare, housing and pensions. These have been forwarded to relevant branches within the MOD for awareness and, where necessary, further consideration.

1.4 As required under the 'HMG Code of Practice on Consultation', this report summarises the responses to the MOD's consultation. It outlines the broad themes which emerged, provides a detailed analysis of the responses to each of the consultation questions and sets out next steps.

### **Devolved Administrations**

1.5 The Scottish Executive and Welsh Assembly Government, as well as Scottish and Welsh Local Authorities, contributed to this consultation. Where appropriate, their comments have been incorporated in this paper. Under devolution, Scotland, Wales and Northern Ireland operate within different legislative and administrative frameworks. Any proposals stemming from this consultation process will therefore need to be considered by the Devolved Administrations before a decision can be made on their implementation in Scotland, Wales and Northern Ireland.

### **Definition of the Armed Forces Community**

1.6 For the purposes of this paper we use the term Armed Forces community to include:

- Service Personnel – individuals currently serving as members of HM Armed Forces, including the UK Reserve Forces.
- Families – the immediate family of members, and the immediate family of veterans and bereaved families.
- Veterans – former members of HM Armed Forces and UK Merchant Seafaring Veterans.

1.7 The Ministry of Defence would like to thank all those who contributed to the consultation. The responses have provided a wealth of useful information which has added considerable value to both the consultation process and wider work on Service Personnel issues.

**Service Personnel Command Paper Team**  
**Ministry of Defence**  
**February 2010**

## General Overview

A number of common themes emerged from the responses:

- **No one option was significantly favoured over another. An Armed Forces Charter and improved use of the Ombudsman service enjoyed the most support but only by a small margin.**
- **Many respondents agreed that measures should be put in place to support the Armed Forces but had no strong preference as to how this was achieved.**
- **There was a general view that increasing awareness of the issues faced by the Armed Forces and improving communication between the Service community and service providers would be an effective way to address existing shortfalls.**
- **There was a view that existing recourse routes already worked and that the introduction of new measures risked causing duplication and confusion.**
- **There was a general view that although the Armed Forces did not want to be disadvantaged, neither did they wish to be formally identified as a minority / disadvantaged group or to be singled out for preferential treatment. There was a general concern that this could undermine public support for their role, particularly in the current economic climate.**
- **A number of respondents, including Local Authorities, said it was difficult to identify the Armed Forces community and therefore ensure they received the required standards of service. The community could improve this by identifying themselves at the point of service delivery. Linked to this, a high number of respondents asked for a formal definition of the Armed Forces community including veterans.**
- **The Armed Forces community saw the attractions of a legal duty as they believed it would ensure consistent levels of service across the UK and keep the issue in the public eye. Local Government tended to highlight the disadvantages of a legal duty due to the potential burden it would impose and additional resources it would require.**
- **There was considerable support for Local Authorities to have autonomy in how they complied with the Command Paper principles. It was suggested that a national legislative framework could prove too restrictive and would undermine existing and effective local partnerships which had been set up over time between Local Authorities and military bases.**

## Chapter 2

### Analysis of the Consultation Questions

2.1 This section provides a more detailed analysis of the responses to the 29 consultation questions. It follows the structure of the Consultation Paper which listed a number of questions against each of the eight options.

**Question 1: Where should we focus future work on implementation of the Command Paper's principles (of no disadvantage and special treatment where appropriate)? At the central UK Government and Devolved Administration level, or at the local level? How do we strike a balance between the two?**

2.2 The majority of respondents felt that future work should be focussed at both the Central UK Government / Devolved Administrations and the local level, and agreed that a balance needed to be struck between the two. The reasons cited for this were that Central Government had to set the direction and provide guidance to ensure that delivery standards across the UK were consistent. Only the UK Government and Devolved Administrations had the authority to effect widespread change and could scope and agree new Command Paper commitments. However it was important to allow flexibility at the local level so that Local Authorities could implement policies in a way that complemented their own structures and priorities. The North East War Pensions Committee summarised this by saying; "adherence to core principles is best driven centrally whilst quality of service is better regulated closer to the point of delivery where hopefully local factors and problems are fully appreciated".

2.3 Underpinning these comments was the recognition that partnership working is now a feature of many areas of Government. For example, a number of Scottish Local Authorities pointed out that they already work in a joint manner with the Scottish Executive under the terms of a Concordat with the Council of Scottish Local Authorities (COSLA).

**Question 2: Having reviewed the various options discussed in this paper, are there others which should be given consideration?**

2.4 A handful of respondents suggested other options for consideration, most of which looked at the role of the MOD. A number of the Local Government responses said that the MOD could better promote the Command Paper principles if it engaged more effectively with Local Government, Local Strategic Partnerships (LSP) and Local Area Agreements (LAA). Linked to this, Wiltshire Council said that the MOD needed to work in a more collaborative manner and do more to understand customer requirements. The War Pensions Committee (WPC) suggested that the MOD should improve its communications on the Command Paper and related initiatives. Other suggestions included:

- The need to educate the wider population about the role of the Armed Forces including introducing lessons to schools.

- Looking at best practice from other countries which could then be adapted to suit the UK.

2.5 The majority of respondents did not comment on this question.

2.6 As part of the work stemming from the consultation findings, the MOD will investigate the suggestions outlined in this section. Models adopted in other countries may well provide valuable pointers, but the different structures and requirements of the Armed Forces in other nations would need to be factored in.

## **Consistent and Enduring Support**

### **Legal Duty on Government to conduct a Five-Year Review**

#### **Question 3: Is there benefit in legislating to ensure the UK Government publishes an Annual Report on the implementation of the Command Paper principles?**

2.7 Annual Report legislation was one of the less popular options in this chapter. 29 respondents supported the option while 23 opposed it, the largest opposition amongst all the 'consistent and enduring' support options. Other respondents were unsure or provided no comment.

2.8 The main support came from the Armed Forces community including the Family Focus Groups and support networks such as the WPC and RAF Families Federation. A small number of Local Authorities also voiced support. The main reasons were that it would ensure accountability and that the needs of the Armed Forces remained in the public consciousness. It would also demonstrate progress and any continuing problems in a public and transparent manner. The Confederation of British Service and Ex-Service Organisations (COBSEO) suggested that without legislation, there would be no incentive for Government to maintain progress.

2.9 Local Authorities raised a number of concerns about this proposal. They suggested that legislation was an excessive response and not necessary to secure commitment. It was unclear what benefits legislation would bring in addition to current arrangements to report progress. There was also a view that unless implemented at a high-level, legislation would not be able to keep up with the pace of developments in this area and that the annual requirement for the collection and publication of information would use up valuable resources. Although East Ayrshire Council recognised the need for leadership to be exercised at the national level it said that; "effective outcomes and working will only be obtained if there are good linkages with Councils and other agencies operating at local level".

2.10 Central Government and some internal MOD respondents suggested that the existing commitment to an Annual Report and to report progress publicly through the External Reference Group was sufficient. The Welsh Assembly Government believed that this was a matter for the UK Government to decide but was content to contribute to an Annual Report.

#### **Question 4: Is there benefit in legislation to ensure the UK Government reviews implementation of the Command Paper formally every five years?**

2.11 This was the second most popular 'consistent and enduring' support option. 34 respondents supported the option and 17 opposed it. This was a low level of opposition. Other respondents were unsure or provided no comment.

2.12 Support for this option was broad coming from individuals, the Armed Forces, Local Authorities and Charities. The main reasons cited included that it was a more



reasonable timeframe than an annual requirement and would secure a long-term commitment from current and future Governments. The longer timeframe would also allow new policies to become established and monitored; this would ensure that any subsequent policy changes were fully evidence based. Several respondents voiced the view that the review should acknowledge changing circumstances and establish what might be required in the future, as part of a more dynamic process. This option was strongly supported by some internal MOD respondents.

2.13 Those who opposed this option expressed a number of reservations. Some Local Authorities said it would not reflect the dynamic nature of the Command Paper initiative and that legislation was excessive and would take up Parliamentary time. The Royal British Legion (RBL) said there seemed to be; “little benefit in continually reviewing implementation of recommendations which had gone before”. A number of organisations also asked if it was necessary to have both an Annual Report and a five year review. Others asked if legislation was necessary when progress and regular reviews could be secured through other means such as a public commitment by Government, consultation events and regular engagement at national and local level. This view however may not fully reflect the potential for the five year review to ensure that policies and procedures within Central Government comply with Command Paper principles.

2.14 Central Government respondents voiced the same views as those expressed in Question 3. The Welsh Assembly Government believed that this was a matter for the UK Government to decide but was content to contribute to a review.

2.15 If the option to impose a legal duty on Government to conduct a five year review is chosen, a suitable legislative opportunity would need to be found, possibly as an addition to the next Armed Forces Bill. This would formalise existing arrangements to report progress and as a result, the regulatory burden would be small.

## Legal Duty on Public Bodies

### **Question 5: Do you believe a new duty on public bodies would help deliver consistent and enduring support for the Armed Forces community? Why? What practical problems might arise?**

2.16 31 respondents supported a legal duty, whilst a relatively high 22 respondents opposed it. 31 did not express a preference. The main support for this option came from elements of the Armed Forces and wider Armed Forces community including the Family Focus Groups. On the whole, Local Authorities tended to focus on the disadvantages of any duty.

2.17 Respondents articulated a number of reasons for their support. They stated that a legal duty was the only way to ensure that public bodies were accountable and that standards of delivery were consistent. It would remove disadvantage by recognising that the Armed Forces had special requirements and ensuring they were always considered during policy development. The War Widows Association said it would raise awareness of the Armed Forces while the RAF Families Federation said it would demonstrate a serious commitment by Government to enforce the Command Paper principles. This would allow members of the Armed Forces community to cite the legislation if they felt they were being disadvantaged. In addition, RBL felt a duty could provide a “heightened level of support”. They suggested a duty could take the form of a centrally imposed; “code of practice or charter...with statutory guidance for regional or local bodies”.

2.18 The main reasons offered against a legal duty were that appropriate legislation already existed. This included equality and diversity legislation as well as the Local Government and Public Involvement in Health Act 2007. As such, further legalisation was not necessary to meet the requirements of the Armed Forces community. It would also pose a considerable burden on Local Authorities and could increase service provision costs. It ran the risk of becoming a tick box exercise and a national duty could undermine locally established arrangements, including Local Strategic Partnerships, which were proven to be effective. The value of these local links was reinforced at the seminars with English and Welsh Local Government Authorities. There was also a risk that enforcing special treatment for the Armed Forces could alienate the general public. Instead, it was suggested that the Command Paper principles could be met through improved communication and consultation at local and national level and between affected organisations, and through raising general awareness. In support of this, Perth and Kinross Council said the; “focus should be on raising basic awareness, understanding and accessibility to such services as opposed to the top down approach suggested here”.

2.19 The concerns outlined in the paragraph above were shared by Central Government. An internal MOD response said; “the main reason for perceived discrimination against the Armed Forces community is lack of awareness of their particular circumstances and needs. Legislation would be heavy-handed and probably unnecessary, risking setting them apart from the communities into which they seek to integrate”. If a legal duty was introduced, the Welsh Assembly Government said it would need to be closely involved in determining how it should

apply to Welsh public bodies. It was made clear at the Welsh Local Government Authority Seminar that there was a preference to use existing structures supported by regular communication and engagement. The Scottish Executive emphasised that a legal duty could be inconsistent with the Concordat which gave Scottish Local Authorities autonomy to implement new policies.

2.20 A number of practical problems were identified. These included:

- How to enforce, resource and measure the duty.
- How to manage the expectations of the Service community.
- How to manage any increase in litigation and legal action such as judicial reviews.
- How to manage opposition from local opinion and action groups.

2.21 If this option were to be pursued, considerable work would be required to prepare for the legislative process. This would include specifying how a duty would eliminate disadvantage, who would benefit and which organisations would be expected to comply. This could prove highly complex and would take some time.

**Question 6: Should such a duty relate to Service personnel, families and veterans? Is there anyone else who should be included?**

2.22 The vast majority of respondents felt that any legal duty should relate to the Armed Forces community. Many in this group said it was not necessary for the legal duty to cover other groups but a smaller number said that it should be extended to cover the following:

- Non-military personnel who provide support to the Armed Forces in dangerous environments.
- Parents and carers of single disabled Service personnel and veterans.
- Estranged spouses of veterans and their children.

2.23 Some of these suggestions stemmed from an acknowledgement that Armed Forces families did not always follow traditional family arrangements and that family demographics were changing. A number of respondents also underlined the need for a clear definition of the Armed Forces community and what a veteran was; this would help to determine to whom a legal duty should apply. For example, Wiltshire Council highlighted the role of full-time and part-time Reserves who were increasingly supporting the Armed Forces. It was also noted that significant resources would be required to support a legal duty if it was extended to a wide interpretation of the Armed Forces community which had been estimated at over 10 million. This needed greater recognition.

**Question 7: Do you believe that the duty should apply to public bodies at the strategic decision-making level or to individual decisions on the delivery of services?**

2.24 Of the 33 respondents who answered this question, a significant majority said that the legal duty should apply to both levels. The RAF Families Federation said it was as; “important that the Minister at the top takes account of the special circumstances pertaining to Armed Forces life as it is that the junior clerk does”. A number of respondents, including individuals and Local Government, identified that service delivery only happened locally and that the impact of any decision would be felt at the regional and local level. Others noted that applying the legal duty at both levels would ensure coherence and common understanding.

2.25 Around a third of respondents said the legal duty should only apply at the strategic level. One individual noted that because the Service community was so widely dispersed it required a strong central lead. RBL said it was important to avoid over-burdening Local Authorities and other public bodies which had small Armed Forces populations. Other respondents suggested a strategic lead would avoid individual interpretations and prejudice at the point of delivery.

2.26 The Welsh Assembly Government noted that some bodies such as Local Authorities, had responsibilities at both levels and that as a result, perhaps it was more appropriate to apply duties to particular categories of decision rather than the body as a whole. This would allow a more; “flexible, needs-based approach which could apply, as appropriate, at the strategic or delivery level”.

**Question 8: Is the list of national, regional and local public authorities to which this duty might apply correct? If not, who else should it cover and why? How can account be taken of services which are delivered by partnerships rather than single bodies?**

2.27 Of the respondents who answered this question, around half said the list was correct and a third said the list was incomplete. The remaining respondents did not express a preference or opposed legislation. Respondents from all groups suggested the following organisations should be included:

- Housing Organisations
- Third Sector and Voluntary Organisations
- Services, Corps and Regimental Associations
- The Armed Forces support network
- Providers of NHS services
- Police and Criminal Justice System
- Quasi Non-Governmental Organisations (Quangos)
- Regional Government Organisations

2.28 A number of respondents provided these suggestions with the caveat that they did not support a legal duty and/or preferred the Charter option. Others said it was impossible to define whom the duty should apply to due to the numbers of organisations involved. Some respondents noted that the list was presented in terms

of England and that different organisations would be involved in the Devolved Administrations.

2.29 Respondents provided a number of suggestions on how account could be taken of services which were delivered by partnerships rather than single bodies. RBL said that public bodies which outsourced a service to meet a statutory duty should ensure it was included in the contract. This view was supported by the WPC and a number of individuals. Several Local Authorities suggested that objectives could be clarified in any partnership arrangements including Local Strategic Partnerships. In support of this, Wiltshire Council said the MOD and Armed Forces community should work more closely with Local Authorities who delivered services to them.

2.30 Some respondents noted that this proposal raised the question of how a legal duty might apply to the MOD and Armed Forces themselves. The MOD acknowledges that this point needs to be clarified, and further work is required to do so.

**Question 9: Should public bodies have flexibility to define what constitutes 'disadvantage' or 'special treatment', and how should these be identified, measured and monitored for their area of business, rather than prescribing this in legislation? Would obtaining the necessary data have cost implications for them?**

2.31 Around two thirds of respondents said that public bodies should not have flexibility to define what constitutes 'disadvantage' or 'special treatment'. This group was comprised largely of the Armed Forces community, internal respondents and support networks such as the RBL and WPC. The main reasoning was that these principles were not open to interpretation and a single definition would avoid inconsistency and ensure parity of treatment. One housing organisation suggested that it would also avoid a 'postcode lottery'.

2.32 The group which supported flexibility for public bodies was drawn largely from Local Government. Their argument was that the needs of a community could only be judged in a local context and that the definition of 'disadvantage' or 'special treatment' would differ from region to region given its structure and Armed Forces population. This view was strongly supported in the joint response of the Local Government Association (LGA), Association of Directors of Adult Social Services (ADASS) and Association of Directors of Children's Services (ADCS) who highlighted the role of Local Strategic Partnerships in identifying and addressing disadvantage in local areas. As a result, they believed these terms were; "best determined locally in order to reflect local circumstances and priority". They also cautioned against special treatment which could be divisive and difficult to justify in law. Other respondents said that local public bodies should work more closely with the military to improve their understanding.

2.33 The Welsh Local Government Association (WLGA) and Welsh Assembly Government agreed that Central Government should provide guidance but there should be local discretion in its application. East Lothian Council highlighted the role

of Single Outcome Agreements which might be an appropriate mechanism for Scotland. Through these agreements, community planning partners all had an interest in achieving the commitments.

2.34 The majority of respondents agreed there would be cost implications but it was not yet clear whether these would be considerable or insignificant.

**Question 10: Are there policies you are seeking to implement, or programmes in which you are engaged, which might be impaired by such a duty? Please explain what they are and how they could be protected.**

2.35 The majority of respondents were not seeking to implement any such policies or did not believe this question applied to them. Wandsworth Borough Council highlighted that its initiative to encourage members of the Armed Forces to register as Service Voters would possibly be affected by a legal duty. East Lothian Council said that; “given current developments around a Single Equality Bill and the proposal for the introduction of ‘socio-economic’ duty, consideration should be given to how these public sector duties would relate to each other and be taken forward sensibly”. One respondent also cautioned that too prescriptive a duty could limit the general autonomy and flexibility of Local Authorities to implement other policies and programmes.

**Question 11: Do you agree with the creation of specific rights in law for the Armed Forces community?**

2.36 37 respondents answered this question. Just over half supported the creation of specific rights in law whilst just under half opposed it. Two expressed no preference and this included the Welsh Assembly Government who felt it was a matter for the UK Government to decide.

2.37 On the whole, the group who supported the creation of specific rights in law were individuals from the Armed Forces community or support networks such as the WPC. The WLGA and a couple of Local Authorities also gave their support. It was felt that the rights of Service personnel should be protected to recognise the nature of their commitment to the UK and to ensure that any disadvantages were eliminated. One individual said that; “the Armed Forces represent a minority group in UK society and therefore merit some anti-discrimination protection”. Despite their support for this option, a number of respondents emphasised that the Armed Forces did not want to be seen as a disadvantaged or minority group. The RAF Families Federation was clear that they were not seeking special treatment and did not wish to separate themselves from society but wanted; “a levelling of the playing field, an acknowledgement of the particular challenges of trying to balance a normal life with a military lifestyle”.

2.38 The group who did not agree with the creation of rights in law were from Local Authorities and some elements of the Armed Forces community. The main reasons cited were that sufficient legislation and processes already existed, that it could prove divisive, and would be inappropriate for Local Government to deliver. There was also

a view that all citizens had the same rights and that the law should be applied equally and fairly to all. Instead, the focus should be on supporting the principle of 'no disadvantage' and taking into account the special circumstances of the Armed Forces. As Wiltshire Council stated, the focus should be on; "making existing service delivery mechanisms more military friendly". A number of internal MOD respondents said that it was not appropriate to make them a 'protected group' and that anti-discrimination legislation should not be applied.

## **A Charter for the Armed Forces Community**

**Question 12: Do you believe there is merit in creating an Armed Forces Community Charter? Should it cover each of the three areas of the community separately – current Service personnel, families and veterans – or should one charter cover the whole community?**

2.39 This was the most popular option in the ‘consistent and enduring’ support chapter. 41 respondents supported a charter whilst only 6 opposed it. This was the least opposed option in this chapter. 37 respondents did not express a preference.

2.40 The Charter option in general had broad support from Central Government, Local Authorities, the Armed Forces community including the Family Focus Groups and support networks. The reasons for this were, as one individual commented, that it would; “bring into one place respective duties and responsibilities”. The WLGA said it would; “raise and keep awareness of the principles and commitments, both for public services and the wider community and clarify the expectations of the Armed Forces community”. The WPC highlighted that a Charter would enable through-life support commenting that; “today’s Armed Forces are tomorrow’s veterans”. Although they voiced support for a Charter, other respondents raised concern about whether the initiative would affect council taxes whilst another said it would only be an aspiration without legislative power.

2.41 The vast majority of respondents supported one Charter. Wiltshire Council was concerned that the creation of separate Charters could lead to uneven development. One internal MOD respondent said it could create a degree of confusion. That said, many respondents noted the varying and different requirements of the three Services and suggested that these could be covered by separate sections under an overall Charter.

2.42 The small number of respondents who opposed a Charter did so because existing legislation was sufficient, there was no guarantee it would lead to lasting change and it could be ignored. One individual said; “in general terms, Charters aren’t enforced, they only represent a statement of intent or guiding principles. This will do nothing to remove the disadvantages faced by Servicemen and their families”. Community Housing Cymru also said that in Wales there would be greater mileage in; “engaging with the key agencies and organisations and making the changes in terms of guidance and policy emphasis”.

2.43 Central Government largely supported the Charter option but pointed out the importance of taking into account statutory duties such as those arising from legislation on human rights, equality and diversity and the NHS Constitution. There could be potentially complex interactions between these duties. Internal MOD respondents also supported a Charter and were clear that it must be properly resourced and delivered to avoid raising false hopes. They said the Charter offered a good opportunity to define each section of the Armed Forces community so that service providers were clear who fell within this boundary. This was particularly important given changing demographics within the military.



**Question 13: Do you believe that the Charter should focus on high level principles? What else would you include – e.g. specific commitments, responsibilities, expectations?**

2.44 The vast majority of respondents felt that the Charter should focus on high level principles. The WLGA said that the; “Charter will not be able to cover all issues that arise therefore high level principles that can be easily understood and are widely applicable would be the best way forward”. However, many in this group felt that these principles should be clearly communicated through to local level and that it would be beneficial if specific commitments were attached to the Charter’s high-level principles. One individual highlighted the need to include reference to access to NHS surgeries and good schools. The WPC said it should include reference to housing, employment and medical treatment. Hinckley and Bosworth Borough Council said the Charter should be “supplemented by specific responsibilities and commitments expected from service communities and public bodies”.

2.45 There was also a view that Local Authorities should have a level of autonomy in how they implemented the principles and commitments. One Local Government response suggested that Local Strategic Partnerships would have a key role to play in this. A number of respondents declined to answer this question as they did not support the Charter option.

**Question 14: Which of the four ways to ‘enforce’ the Charter would you consider to be most effective?**

- 2.46 The four enforcement methods listed in the Consultation Paper were:
- Option A: Government Departments and Devolved Administrations could agree to support the Charter in development of their own policy.
  - Option B: The Charter could be rolled out to delivery organisations at all levels on a voluntary basis.
  - Option C: The Charter could be rolled out in a similar fashion to Investors in People.
  - Option D: The Charter could be made legally binding for public bodies.

2.47 Of the respondents who expressed a preference, the most popular option was the legislative route. The 27 respondents in this group were largely from the Armed Forces community and support network. It was suggested that the Charter would not be effective without teeth and that legislation was the only way to hold public bodies to account and guarantee a long-term commitment. COBSEO said it was the; “surest way to ensure commitment and the easiest to report on and review acceptance”. RBL and other respondents said the Charter would only be of value if it was enshrined in law “with a duty on public bodies to consider the needs and differences experienced by the Armed Forces community”. 6 of the respondents in this group also expressed support for pursuing non-legislative routes as well.

2.48 18 respondents supported non-legislative routes only. The majority of this group tended to be drawn from Local Authorities. Of the small number of respondents who did express a preference, Option C was the most popular, followed

by Option B and then Option A. Shepway District Council said that Option B would be most effective as it would; “enable local organisations to commit in principle to support the Armed Forces community and be supportive at a practical level in accordance with local need and local resources without the need to devote scarce resources to achieve accreditation”. Suffolk Primary Care Trust (PCT) said that Option C was more likely than legislation to positively encourage organisations to sign up.

2.49 Central Government and the Welsh Assembly Government preferred the non-legislative route because of the burdens which a mandatory Charter might impose on Local Authorities and other public bodies, in much the same way as the more general legal duty discussed above. A voluntary Charter would still meet the Command Paper objectives and could be given ‘teeth’ through measurable standards and a regular review process. Progress could be reported through the Service Personnel Command Paper Annual Report. This view was echoed by the Scottish Executive. One internal MOD respondent said the Charter would probably be most effective if implemented at local level, possibly through an Investors in People type initiative.

2.50 Just under half of the respondents were unsure or did not comment on this question. It is also worth highlighting that some respondents who did not support the Charter option, still expressed a preference on how best to enforce it.

**Question 15: If a legislative route were followed, would it apply to the same organisations as the ‘legal duty on public bodies’? If not, which others should be included?**

2.51 The vast majority of respondents who answered this question agreed that it should apply to the same organisations. Those who answered no, suggested the following organisations should be included:

- Third Sector and voluntary organisations
- Private Sector

2.52 It was also suggested that the decision should be left to Local Strategic Partnerships in accordance with local needs and priorities. The Welsh Assembly Government said it should determine whether the Charter should be legally binding on bodies for which it has responsibility. A number of respondents used this question to highlight their opposition to the legislative route.

2.53 The suggestion to include the private sector is a significant departure from our thinking, as outlined in the Consultation Paper, on which organisations should be bound by a legal duty. It therefore requires further consideration and a broad consensus on whether it would be both beneficial and realistic.

**Question 16: If a non-legislative route is to be followed, which bodies should be encouraged to adopt a Charter?**

2.54 A considerable number of bodies were identified in response to this question. While a sizeable number of respondents said it should apply to all organisations which provided services to the Armed Forces, other suggestions included:

- Armed Forces Community
- Central and Local Government
- Local Strategic Partnerships
- Government Office Network
- Regional Development Associations
- Regional Assemblies
- Local and national education authorities
- Local and national NHS bodies and Primary Care Trusts
- Housing Associations
- Local Councils
- Charities
- Private Companies who provide services to the Armed Forces

2.55 Shepway District Council suggested that bodies which are encouraged to sign up to the Supporting Britain's Reservists and Employees (SaBRE) statement could also sign up to a Charter. One internal MOD respondent suggested an Investors in People style solution where organisations such as Local Authorities, Primary Care Trusts and Central Government were encouraged to adopt a Charter.

2.56 Whilst there is broad consensus for a Charter, respondents have raised clear advantages and disadvantages to this option. There are also different perceptions on whether the Charter should be legally binding or voluntary, and how it should operate. Against this background, the option requires further consideration and discussion with stakeholders on how a Charter might be developed and implemented.

## **Customer Service Excellence – The Government Standard**

### **Question 17: Is there benefit in using the Customer Service Excellence standard to assess how public bodies address the needs and views of the Armed Forces community in delivering public services?**

2.57 The Customer Service Excellence (CSE) option received the least support in the ‘consistent and enduring’ chapter and approximately half of the respondents offered no comments. This perhaps reflects limited awareness of the scheme. Of the respondents who did comment, 28 supported the idea whilst 14 opposed it.

2.58 Respondents supported the option for a number of reasons citing its proven effectiveness and ability to measure performance. Despite their support, a number of individuals also acknowledged that the voluntary nature of the scheme could be a disadvantage. The joint LGA, ADASS and ADCS response favoured this as from their perspective it would allow Local Authorities to choose whether they adopted the approach.

2.59 A number of suggestions were made as to how the scheme could best reflect the requirements of the Armed Forces. Shepway District Council suggested CSE reflect the Command Paper principles whilst the Fife Veterans Association suggested that precise problems encountered by the Armed Forces community should first be identified. Wiltshire Council emphasised that a customer service initiative would only work if it was based on a thorough understanding of what the customer wanted and suggested that MOD and selected Councils work together to ensure any final proposals reflect this.

2.60 A number of more general points were also made. The RAF Families Federation was concerned that organisations may struggle to identify Service Families which would make it difficult to gather customer feedback. The joint LGA, ADASS and ADCS response noted that the Common Area Assessment already delivered judgements on how well local partners delivered to communities in specific areas.

2.61 Respondents opposed the option for a number of reasons. A number of organisations, including Charities and Local Authorities felt it would be too bureaucratic and expensive to deliver. Although RBL felt the CSE standard was an excellent tool, particularly when supported by quality or kite marks, it felt there was little benefit in applying it to the Armed Forces. The WPC was concerned that the Armed Forces and veterans were too widely dispersed across the UK to establish an effective formal customer relationship. A number of individuals expressed concern that the voluntary nature of the scheme meant there would be; “no motivation for authorities to improve their treatment of Servicemen”.

2.62 Whilst the Welsh Assembly Government supported the initiative, they highlighted that the Welsh Customer Service Core Principles of Access, Experience, Responsiveness, Language Options and Redress may offer a way to assess delivery.

2.63 In discussions with Central Government Departments it was agreed that imposing a mandatory CSE requirement could represent an undue burden on Local Authorities and other organisations. However it was suggested that the voluntary CSE model could still play a useful role in ensuring public bodies considered the needs and views of the Armed Forces community. In addition, the CSE website could be used to showcase best practice where local bodies worked closely and effectively with the Armed Forces. Internal MOD respondents supported the idea of using an existing framework and assessment methodology to monitor progress. They also suggested that CSE could be linked with an Armed Forces Charter.

**Question 18: Would the various approaches outlined in the Consistent and Enduring Support chapter work well in combination, or would they create either conflict or confusion?**

2.64 Most respondents said there would be conflict or confusion but that this could be overcome through legislation, clear and consistent communication, coordination and/or performance measurement. A smaller number of respondents felt that various approaches could work well in combination, particularly if they were complementary such as a Charter supported by a CSE model. Shepway District Council said that; “a combination of approaches would work well as it would enable individual organisations to express support in a way that reflects its resources and local priorities”. A number, including Wandsworth Borough Council and the War Widows Association, said that one approach was sufficient and would avoid confusion.

## Route for Recourse

### Ombudsmen

#### **Question 19: What views do you have about existing public sector Ombudsman scheme provision as it applies to the Armed Forces community?**

2.65 The option to place reliance on the public sector Ombudsmen as a route for recourse was the most popular option in this chapter. Approximately half of respondents supported it with only three respondents objecting to the proposal. Of those who supported the option, the majority favoured using the existing arrangements. Only a handful of respondents suggested creating a new Armed Forces Ombudsman. Approximately half of the respondents offered no comment.

2.66 Respondents raised a number of views on points on this option. A majority focussed on the view that the present system is sufficient, it has an important and powerful recourse role, it should be used more frequently, and that it exists to serve the Armed Forces community just as much as the general public. Wandsworth Borough Council spoke for many when it said the; “existing public sector Ombudsman scheme should be adequate to consider any complaints from the Armed Forces community”. The War Widows Association highlighted that by using the existing system, the Armed Forces; “would in no way be advantaged or disadvantaged in the view of the general public”.

2.67 The small minority who opposed reliance on the Ombudsman scheme as a route for recourse cited a number of reasons. These included a lack of power and their inability to enforce their findings in law. The WPC said the Ombudsman scheme worked well, but commented that access to the Parliamentary Ombudsman was only possible through an MP which caused difficulties for veterans who lived outside the UK.

2.68 A number of individuals and the RBL favoured establishing a separate Armed Forces Ombudsman. RBL, who believed that the existing Ombudsmen were rarely used by the Armed Forces, suggested this could be done by extending the role of the Service Complaints Commissioner (SCC). The advantages would be that this Ombudsman would be well acquainted with the requirements of the Armed Forces and could back up any legislation created as a result of the consultation process. The RAF Families Federation also highlighted the role of the SCC. Internal MOD respondents agreed with the view expressed in the Consultation Paper that the role of the public sector Ombudsman was quite separate from the role of the Service Complaints Commissioner, who was charged with overseeing the handling of internal complaints by Service personnel relating to the chain of command, and the difficulties that would be caused by two Ombudsmen covering the same aspects of service delivery.

2.69 A number of public sector Ombudsmen provided responses to the consultation. They were clear that the existing service adequately covered the Armed Forces community who, along with the general public, were always entitled to seek their advice and assistance. In addition, the Ombudsmen had numerous tools

available to them when investigating complaints and they therefore saw no reason to seek additional legal powers. This view was shared by Central Government and internal MOD respondents. One internal MOD response suggested the role of the Ombudsman could be strengthened by the existence of an Armed Forces Charter.

**Question 20: Are there any developments to those schemes which should be considered?**

2.70 The majority of respondents to this question highlighted the importance of familiarising Ombudsmen with the requirements of the Armed Forces and Command Paper principles and ensuring the Armed Forces community knew how to access this support. Wandsworth Borough Council said the; “staff of the Ombudsman scheme would benefit from additional training and guidance regarding the work of, and the challenges faced by, the Armed Forces community”. This would help to ensure the Ombudsman service was useful to the Armed Forces. Others suggested the MOD had an important role to play. The RAF Families Federation said that the MOD’s work to familiarise the Armed Forces advocates with the unique circumstances of military life could be extended to the Ombudsmen. A number of respondents suggested that serving or former members of the Armed Forces should be seconded to the Ombudsman to provide advice and assistance as necessary. It was also acknowledged that although the Ombudsman process was an effective means of recourse, it was slow.

2.71 In their responses, the public sector Ombudsmen recognised that the MOD wished to raise their profile and accessibility to the service, and welcomed the opportunity to familiarise themselves with Armed Forces issues. This could be done by working with the advocate networks or, if taken up, the Local Networks. This view was shared by Central Government and internal MOD responses. One internal MOD response suggested that the Ombudsman service should be publicised amongst the Armed Forces community along with other recourse routes for Serving personnel such as the Chain of Command.

2.72 Chapter 3 on Next Steps provides more information on how MOD will take forward the views raised on the Ombudsman service.

## Local Armed Forces Advocate Networks

### **Question 21: Is there benefit in creating a network of local advocates to act as champions for the Armed Forces community and to seek to resolve policy or legislative issues that may cause disadvantage?**

2.73 This was the second most popular recourse option after the Ombudsman service with 38 respondents expressing support. This support was not limited to any particular group and came from a wide number of individuals, Local Authorities and Interest Groups. 10 respondents were opposed to the option and 36 did not provide a comment.

2.74 A number of common themes emerged from respondents who supported this option. There was a general view that the advocate system had already demonstrated its effectiveness across the UK and that a local network could be built on the work already undertaken by the existing Armed Forces advocates in Whitehall and the Devolved Administrations. The specific requirements of the Armed Forces community justified a dedicated advocate network. However this network needed to be formalised and would benefit from improved communication between national and local level. A number of individuals, Councils and Primary Care Trusts highlighted the potential benefits for the Armed Forces in that local policy development and service delivery would better reflect their requirements and potential impacts would be identified at an earlier stage. Furthermore it would raise awareness and understanding at the local level. A number of respondents emphasised the link between the strategic level advocates, who were well placed to develop intent, and local level advocates who would then be well placed to deliver this intent. Linked to this, several respondents highlighted that the difficulties encountered by the Armed Forces community tended to be at the local level and point of delivery. They were therefore best dealt with at this level.

2.75 There were also suggestions that the network could be based on existing organisations such as the WPC network or Soldiers, Sailors, Airmen and Families Association (SSAFA). This would have the benefit of utilising existing skills and knowledge. A small number of respondents, including RBL, argued that the network would only be effective if it had powers of enforcement, ideally through legislation. Wiltshire Council expressed a preference for local solutions and said the decision to appoint an advocate should depend on the military presence in that region; “ ‘one size fits all’ will not lead to consistent improvements, it will simply require people to set in place arrangements which may not be suitable for their areas”.

2.76 Those who opposed this option cited a number of reasons. The most common was that the existing arrangements were adequate e.g. through HIVES. COSLA said that a system which relied on advocates would be neither robust nor sustainable. It argued that “the issues we are dealing with cross welfare, employability, Human Resources, community health services...we need to look at the issue more holistically and come up with sustainable, workable solutions”. Perth and Kinross Council questioned the need for advocates in every Local Authority area, particularly those with small or no Armed Forces Communities, given resource constraints.



2.77 Internal MOD responses also supported a local network given that the main links for much of their community lay at this level. This would rely on improved communication at local and national level. They also emphasised that the role of the advocates should be made clear. For example, would they provide a route for recourse, advice or be a point of contact for the Chain of Command? The Welsh Assembly Government felt that the appointment of local advocates was likely to be of greatest value in relation to bodies which serve large numbers of military personnel, their families and veterans.

2.78 Since the launch of the Consultation Paper, a number of initiatives have been launched which involve the creation of advocates in support of the Armed Forces. These include local Armed Forces community champions for the Welfare Pathway pilots, see below, as well as Armed Forces champions for Job Centres. On 11 January 2010, the Minister for Health announced that Strategic Health Authorities and Primary Care Trust Champions would be identified to ensure that their local plans and service providers take the needs of the Armed Forces Community into account. We will monitor these developments and if this option is selected, ensure that best practice is applied and that any duplication is minimised. It is worth highlighting that any initiative to develop a local Armed Forces network resulting from this consultative process would be firmly focussed on their role as a route for recourse, but does not preclude a wider role.

### **Question 22: Can Scrutiny Committees play a bigger role in supporting this community?**

2.79 This suggestion received fairly low levels of support with only 28 favouring a bigger role for Scrutiny Committees. 11 opposed the option and perhaps in an indication of the relatively unknown nature of Scrutiny Committees, 44 respondents provided no comment.

2.80 Those who supported the option made a number of comments. Hinckley and Bosworth Borough Council suggested that the Scrutiny Committees could commission work to investigate issues which affected the Armed Forces. They also noted that opportunities existed for joint scrutiny sessions which could address matters of wider local interest. COBSEO agreed the role of Scrutiny Committees should be expanded to cover the Armed Forces and suggested a new Armed Forces Charter could provide the framework. A small number of individuals believed this option would ensure that Local Authorities explained their decision making in relation to the Armed Forces but that the Scrutiny Committee must be non-political and transparent, and ideally have the authority to enforce recommendations and decisions.

2.81 WLGA supported the option but said it should be explored in more detail and suggested that; “advice and guidance or examples of best practice should be developed and shared to support scrutiny exercises”. Linked to this, the Welsh Assembly Government noted that Scrutiny Committees already considered the; “effectiveness of service delivery to the whole community, including Armed Forces personnel, their families and veterans”.

2.82 Those who opposed the suggestion cited a number of reasons including the additional costs and increased bureaucracy. Inverclyde Council felt it was important for the general public to be treated fairly and equally and that providing preferential treatment to the Armed Forces could cause resentment. Shepway District Council said that existing scrutiny mechanisms were adequate.

**Question 23: Can you see any disadvantages, including costs, to this approach?**

2.83 Almost all respondents highlighted the additional costs and bureaucracy associated with this approach. A smaller number also commented on its complexity and unwieldy nature. The RAF Families Federation suggested there would be a cost implication associated with training to ensure that champions and advocates were adequately prepared for their role. The joint LGA, ADASS and ADCS response and Wiltshire Council highlighted the need for a formal New Burdens and Impact Assessment to capture any additional costs.

## Single Point of Contact / Hotline

### **Question 24: Is there benefit in creating a single point of contact for the Armed Forces community. Who is best placed to host it?**

2.84 This was one of the least popular recourse options. 32 respondents supported the creation of a single point of contact whilst 13 opposed it. This was the highest level of opposition in this chapter. Around half of the respondents did not provide a view.

2.85 The support base for this option was broad and included individuals, Service Charities, Local Authorities and Interest Groups. Respondents suggested a number of potential Single Point of Contact (SPOC) hosts including the Service Personnel and Veterans Agency (SPVA), MOD, other Central Government Departments such as the Home Office, Citizens Advice Bureau and DirectGov. The SPVA was one of the more popular options. The War Widows Association said it was already well known and recognised by veterans. Other individuals said it was best placed due to its specialist knowledge. Some respondents, including the WPC, highlighted the economic sense of using existing SPVA services rather than establishing another organisation. The Welsh Assembly Government also highlighted the importance of using existing services which understood the requirements of the Armed Forces.

2.86 Other respondents preferred the MOD Head Office or another Central Government Department to host the SPOC. They believed that only cross-Whitehall liaison would ensure success and that Central Government had the relevant expertise and understanding. A handful of respondents said the helpline must be resourced to handle the wide range of queries it would receive from a diverse and large Service audience.

2.87 A number of general themes emerged from respondents who opposed a SPOC. The majority felt that existing services such as the Family Federations, SPVA and HIVE were sufficient and that the creation of an additional SPOC would cause confusion. East Lothian Council highlighted the importance of considering Local Authorities which did not have large Armed Forces communities and did not require special arrangements. In these cases, initiatives such as the Citizens Advice Bureau and Council Customer Service Centres were sufficient. The Family Focus Groups expressed a preference for 'face to face' contact and also suggested that the information provided by these services was often too generic and would benefit from being tailored to local needs.

2.88 A number of internal MOD respondents supported the idea of a SPOC and highlighted its attractions of; "simplicity, ease of publicity and memorability". However, they agreed it would be an additional layer of communication and that one helpline was unlikely to have the expertise required to address a diverse range of enquiries. For this reason, the SPOC should not be a recourse route but provide information on recourse and other services. Other MOD respondents who did not support the creation of a new SPOC said that existing services were sufficient.

2.89 Since the publication of the Consultation Paper, a National Point of Contact (NPOC) helpline has been launched to automatically direct Serving Personnel and Veterans to existing Service helplines. The function of the NPOC is different from the recourse role envisaged for the SPOC but the MOD will consider how the views raised here should be addressed both in terms of any new SPOC and existing Service helplines.

**Question 25: Would this service conflict with the services provided by other organisations?**

2.90 Of the 40 respondents who answered this question, a significant majority did not believe a new SPOC would conflict with the services provided by other organisations. The remainder said that there would be a conflict. A small number of respondents in this group felt it would have a negative impact on voluntary and third sector organisations which already provided a similar service. It was suggested that this could be mitigated by improving coordination with the Armed Forces community, by using existing services as opposed to creating a new one, or ensuring that a new SPOC was simply a sign-posting service to existing service providers.

2.91 Respondents who did not foresee any conflict made a number of similar suggestions. These included ensuring that there was effective management and coordination between the SPOC and existing service providers. A small number of individuals commented that the SPOC's role as a 'sign-posting service' would mitigate any conflict. The Welsh Assembly Government was keen to ensure that the SPOC did not eclipse other services available to the Armed Forces such as the Citizens Advice Bureau.

**Question 26: Do you see a greater role for DirectGov as a portal for providing information to the Armed Forces community on resolving problems?**

2.92 The use of DirectGov was one of the more popular recourse options with 36 respondents expressing support. 10 did not support the option and 38 did not express a view.

2.93 The support for this option came from a wide range of individuals, organisations and Interest Groups. Notably, a high number of Local Authorities from across the UK supported the use of DirectGov. Inverclyde Council said that; "internet based services are the way forward" and Shepway District Council said the use of DirectGov; "would be in line with Government policy to provide more information and make more services available on line". The LGA, ADASS and ADCS joint response said it had significant potential to contribute to other support networks. Other respondents supported the option because it would be straightforward, easy to use, could be viewed by a wide audience across the UK and would be extremely cost effective.

2.94 A number of suggestions were made to help ensure the website was useful for the Armed Forces. These included the need to ensure information was consistent and up to date and that the service was well publicised so that the Armed Forces

community knew how to access it and gain the most benefit from it. The Welsh Assembly Government highlighted the need for a bilingual option whilst others stressed the importance of a non-IT based alternative (e.g. telephone access) which acknowledged that not all members of the Armed Forces community had access to the internet or wished to use it. Consideration also had to be given to those with poor educational skills

2.95 Only a small number of respondents explained their reasons for opposing the use of DirectGov. They suggested that organisations such as HIVE and SSAFA already provided an adequate service and that DirectGov was under-utilised and under-advertised.

## Welfare Pathway

### **Question 27: Can a system for providing co-ordinated advice and information to the Armed Forces community, through a Welfare Pathway, contribute to a system of seeking recourse?**

2.96 The Welfare Pathway option was supported by 35 respondents. Only 8 did not support it as a route for recourse, a low level of opposition, and around half of the respondents expressed no preference.

2.97 A number of similar themes emerged from the group who supported this option. This group had wide representation from individuals, Local Councils, Interest Groups and Service Charities. One common view was that the usefulness of the Welfare Pathway lay in its ability to provide general information as well as advice on recourse routes. Another view was that it had already started to provide useful avenues for recourse for the Armed Forces community, in particular veterans. Hinckley and Bosworth Borough Council commented that it; “would appear to allow a range of options for recourse whilst providing a coordinated system of communicating advice and support”. Linked to this, COBSEO felt that by providing early advice, it would help to reduce the number of personnel who were forced to seek recourse. An internal MOD respondent supported the idea of improving access to help and support by developing existing portals on the High Street and in the wider civilian community. This would help to ensure that all members of the wide Armed Forces community could access the service.

2.98 A number of respondents highlighted the importance of widely publicising contact details of organisations involved in the delivery of the Welfare Pathway and ensuring that websites and telephone systems were easy to locate and easy to use. Coordination would also be important given the number of organisations already involved and the potential for confusion.

2.99 A small number of respondents expressed concerns against the initiative. Some suggested it would be an unnecessary layer of administration and that the real key to providing an excellent service lay in establishing good local networks and making best use of those already in existence. The Armed Forces Pay Review Body (AFPRB) was concerned that it could separate the Services from the general public and that it would be more preferable to build on existing mechanisms such as Family Federations. This view was echoed by Perth and Kinross Council who advocated the use of other approaches such as the Ombudsman and Armed Forces Advocates.

2.100 A number of other respondents made some general points on the Welfare Pathway initiative. As raised elsewhere, Wiltshire Council underlined the importance of understanding customer requirements before developing any new policy. Cwm Taf Local Health Board suggested that different Welfare Pathways may be required for different countries due to slight differences in policy interpretations between the Devolved Administrations.

2.101 Since the publication of the Consultation Paper, Welfare Pathway pilots have been launched in Kent and Wigan. The Devolved Administrations are also

considering whether to launch pilots. Where relevant, the consultation findings and the views raised in this and other sections will be used to improve current and future pilots; and determine whether the scheme should be rolled out across the UK. Encouraging front line staff to ask the question; “are you part of the Armed Forces community” is a fundamental tenet of the Welfare Pathway initiative. This could help to address comments raised elsewhere in this paper about how best to identify members of the Armed Forces community.

**Question 28: Can you see any disadvantages, including costs, to this approach?**

2.102 Almost all respondents who identified disadvantages, highlighted the additional costs associated with this approach. Given the number of organisations involved, several respondents predicted difficulties with coordination, duplication of effort and possible confusion. A number of respondents highlighted the risk that Welfare Pathway personnel would not understand the military and it was therefore important to ensure staff were well trained and aware of the various service providers and recourse routes. This would allow them to ask the right questions and point clients in the right directions. It was also suggested that there could be resource implications associated with any staff training.

2.103 A number of respondents did not believe there would be disadvantages. Several felt that costs would be minimised if the Welfare Pathway was limited to existing facilities and/or organisations; or even a telephone hotline and local assistance through established providers such as the Citizens Advice Bureau. One respondent also suggested that any initial costs would be offset by the longer-term benefits of joining diverse and uncoordinated elements of the Welfare Pathway into one.

**Question 29: Would the various approaches outlined in this chapter work well in combination, or would they create either conflict or confusion?**

2.104 The responses to this question were mixed. Most respondents felt there was a risk of conflict or confusion but only a small minority suggested that as a result, a combination of options should be avoided. One internal MOD respondent said there were; “considerable benefits to looking at ways to develop a number of the approaches in parallel, in particular the use of the Welfare Pathway and the development of existing routes to recourse”. It was suggested that careful planning, coordination and monitoring would help to avoid confusion. It would also be important to clearly publicise the various initiatives and provide sufficient funding and resources. A number of respondents said that existing arrangements were sufficient and should be optimised to avoid confusion. One individual highlighted the importance of avoiding complexity and additional bureaucracy by keeping things as simple as possible.

## Chapter 3

### Next Steps

3.1 The consultation responses have provided a wealth of useful information which has added considerable value to both the consultation process and wider work on Service Personnel issues. They have also underlined the complexity and inter-related nature of these issues. The MOD therefore intends to continue to assess the consultation options against this background before reaching a final decision. As a result of the consultation, we are much better informed and better placed to take this work forward.

3.2 While the consultation options are more fully considered, the MOD has identified a number of actions stemming from consultation which do not require decisions to be taken on the overall approach. Work has already begun on these actions which include:

- The requirement to provide a clearer definition of what constitutes the Armed Forces community and a veteran.
- The requirement for MOD to improve its communication on Service Personnel issues and its level of engagement at local and regional level.
- The requirement to develop a Familiarisation Programme for the public sector Ombudsmen to improve their awareness of the needs of the Armed Forces community.

3.3 In addition, the MOD intends to produce an Impact Assessment and New Burdens Assessment. This will scope the costs and impact of any policy decisions stemming from the consultation.

3.4 The Government places the highest priority on its commitment to the Armed Forces community. The Service Personnel Command Paper and recent public consultation have played a vital part in this. In the coming months we will turn the key consultation findings into a number of policy proposals which seek to embed the principle of no disadvantage. This work will be taken forward in conjunction with key stakeholders.



## List of Contributors

### Respondents to the Consultation

<b>RESPONDENT</b>	<b>NAME</b>
<b>Service Charity</b>	Gardening Leave
	War Widows' Association of Great Britain
	Army Widows' Association
	The Royal British Legion
<b>Service Families Federation</b>	RAF Families Federation
<b>Other Third Sector Organisations</b>	Community Housing Cymru
	Barnardo's Cymru
	Confederation of British Serving and Ex-Serving Organisations
<b>Local Government</b>	
<b>England</b>	Wandsworth Borough Council
	Shepway District Council
	Dudley Metropolitan Borough Council
	Hinckley and Bosworth Borough Council
	London Borough of Bexley
	Joint Response from the Local Government Association, Association of Directors of Adult Social Services and Association of Directors of Children's Services
	Wiltshire Council
	Rutland Council
	Town Clerk's Office, City of London
<b>Scotland</b>	Confederation of Scottish Local Authorities
	Inverclyde Council
	East Ayrshire Council
	East Lothian Council
	Angus Council
	Perth and Kinross Council
<b>Wales</b>	Welsh Local Government Association
<b>NHS England</b>	Suffolk Primary Care Trust
	NHS North Lincolnshire
	Gloucestershire Primary Care Trust
	NHS Surrey
	NHS Sandwell
<b>NHS Scotland</b>	NHS Tayside
<b>NHS Wales</b>	Cwm Taf Local Health Board
<b>Central Government</b>	HMRC
	Department of Health
	Chief Executive, Service Personnel and Veterans Agency
<b>Internal Military Responses</b>	Royal Navy
	Army
	Royal Air Force
	145 (South) Brigade
	3(UK) Division
	North Yorkshire Military Civil Integration Project Board, Catterick Garrison Community Development Office, RAF Halton

	Community Development Office, RAF Halton
<b>Devolved Administration</b>	Welsh Assembly Government
	Minister for Housing and Communities, Scottish Executive
<b>Interest Group</b>	Armed Forces Pension Group (two responses)
	Fife Veterans Association
<b>Member of the public</b>	
<b>Serving Military Personnel</b>	18 individuals
<b>Service Family</b>	4 individuals
<b>Veteran or Retired</b>	3 individuals
<b>Other</b>	4 individuals
<b>Large Company</b>	Right Management
<b>Other</b>	Local Government Ombudsman
	Parliamentary and Health Service Ombudsman
	Isle of Man War Pensions Committee
	Diocese of Minerva
	Armed Forces Pay Review Body
	War Pensions Committee
	North East War Pensions Committee
	Yeovil Families Group

Between October and December 09, consultation meetings were held with the following organisations:

### Central Government

- Cabinet Office
- Department of Health
- Department for Work and Pensions
- Department for Communities and Local Government
- Department for Children, Schools and Families

### Devolved Administrations

- Welsh Assembly Government
- Scottish Executive
  
- Veterans Scotland

### Family Focus Groups

- Royal Navy Air Station Yeovilton
  - 7 participants
- Larkhill Camp (Army)
  - 23 participants
- RAF Cottesmore
  - 20 participants

All groups were comprised of Officers, Other Ranks and spouses.

### **English Local Government Association Seminar**

- Mayor of Lewisham and Chair of Local Government Employees
- South Gloucestershire Council
- Oxfordshire County Council
- Hampshire County Council
- Buckinghamshire County Council
- Plymouth City Council
- Dorset County Council
- Fareham Borough Council
- Gloucestershire County Council
- Rutland County Council
- Essex County Council
- Wiltshire County Council
- Government Office for the South West
- North Yorkshire County Council
- Central Bedfordshire Council
- Rushmoor Borough Council
- Local Government Association
- South Somerset District Council
- Local Government Ombudsman
- St Edmundsbury Borough Council
- Richmondshire District Council
- Gosport Borough Council
- Cambridgeshire County Council
- Government Office for the South West
- Army Families Federation
- RAF Families Federation
- Royal Navy Families Federation
- COBSEO
- RAF Welfare Staff

### **Welsh Local Government Association Seminar**

- Welsh Assembly Government
- Welsh Local Government Association
- Bridgend County Council
- Caerphilly Council
- Health Commission Wales
- Ceredigion County Council
- Newport County Council
- Pembrokeshire County Council
- Cardiff and Vale University
- Cwm Taf Local Health Board
- Aneurin Bevan Local Health Board
- Swansea City Council
- Powys County Council
- Community Housing Cymru
- Army Families Federation – Representative for Wales
- 160 (W) Brigade