

## **Forces in Mind Trust Submission to the Armed Forces Bill Select Committee**

### **Introduction:**

Forces in Mind Trust (FiMT) was founded in 2011 with a £35 million endowment from the National Lottery Community Fund to support serving and former serving members of the Armed Forces with particular regard to improving the transition to civilian life for themselves and their families. We do this by funding evidence generation to understand issues and identify what works, and by convening stakeholders and decision-makers to equip them with the knowledge and understanding required to improve the experiences of Service leavers and families. We also fund the independent [Centre for Evidence for the Armed Forces Community](#), a free-to-access research repository on ex-Service personnel and their families, delivered by King's College London and RAND Europe.

### **Executive Summary**

FiMT is supportive of the proposed plans to extend the scope of the Armed Forces Covenant Legal Duty. Evidence from the FiMT-funded [Our Community, Our Covenant and Beyond](#) research suggests that the existing Duty has increased awareness of the Covenant and associated support across public bodies and the wider public, and has also encouraged self-identification and improved data recording of Armed Forces community status. Extending the Duty to Devolved Administrations could also improve consistency for a highly mobile cohort. However, considerations should be made for differing governance arrangements, in particular the nuanced setting within Northern Ireland.

Resource barriers should not be overlooked when considering the effective implementation of extending the scope of the Legal Duty.

Success would mean fewer reported instances of disadvantage experienced by members of the Armed Forces community alongside more consistent access to timely and appropriate support across the UK, evidenced through agreed metrics and robust data capture.

### **Armed Forces Covenant**

#### **Question 1: What is the expected impact of the changes to the Armed Forces Covenant on serving personnel, their families and veterans?**

The Covenant's non-prescriptive nature makes it difficult to assess its impact on Armed Forces community outcomes. In addition, it can be hard to understand whether outcomes, such as a reduction in disadvantage, can be attributed to the Covenant directly or to the wider ecosystem of support that is available. The lack of robust and consistent data on the Armed Forces community also hinders evaluation efforts.

Despite the absence of consistent monitoring data, research conducted with local authorities and other stakeholders as part of the [Our Community, Our Covenant and Beyond](#) project suggests progress has been made. This includes an increased awareness of the Covenant, the Armed Forces community and the disadvantage they may face among local authority staff. The report's in-depth case studies also highlight examples of new services for the Armed Forces community and improved referral and support pathways.

By expanding the Covenant Legal Duty, there will likely be a long-term positive impact on serving personnel, their families, and veterans, through increased awareness of the Covenant and the Armed

Forces community across the new policy areas. Employment outcomes are also a key area of potential impact for veterans. As detailed within our oral evidence to this committee, research from our [Understanding the Transition from Military to Civilian Life](#) report suggests that while many people are transitioning into employment, certain groups, including female veterans, veterans from ethnic minority backgrounds, and disabled and older veterans, can experience underemployment, moving into roles that do not fully utilise their skills. In this context, there is potential that extending the Covenant Duty could act as an enabler for improving employment outcomes, in the same way that the introduction of due regard in health, housing and education helped to raise awareness and understanding of the unique impacts of service. Any such benefits are likely to depend on effective implementation and consistent pathways into appropriate employment and skills support.

However, the positive impact will not be instantaneous. Our answer in Question 3 set out below outlines some of the barriers that may be faced during the rollout of the extension of the Covenant. Given the progress that has been made, where the Duty is already in place, bodies within the scope of the Duty, working with partners, can build on the examples of good practice highlighted in the [Our Community, Our Covenant report](#), and utilise the existing resources and forthcoming Government guidance to help facilitate and further strengthen effective Covenant delivery.

FiMT's [Understanding the Transition from Military to Civilian Life](#) report suggests that awareness and understanding of the Covenant—its remit, and what it can realistically provide—varies across the Armed Forces community. Where this creates uncertainty about eligibility, routes to support and expected practice, it can contribute to post-service disadvantage and delayed access to appropriate services. Extending due regard to all Government Departments and Devolved Administrations, alongside widening the scope, is likely to support earlier, clearer and more consistent application of Covenant principles, particularly at key points of transition.

**Question 2: Does the Bill extend the scope of the Armed Forces Covenant Legal duty in an appropriate way?**

**Question 2a: Are there policy areas which should/should not have been included?**

FiMT is supportive of the scope set out for extending the Covenant Legal Duty; our evidence base suggests disadvantage is experienced across a wider range of public services than the current three policy areas, showing a need for strengthening legislative remit. Our research has found that the Duty of due regard can act as an enabler for improved awareness, decision-making, and delivery, and thus, an extension of the scope could further improve this.

As previously raised in our response to the [Defence Committee's call for evidence inquiry](#) into the Armed Forces Covenant, a two-tier delivery of the Covenant should be actively avoided. Currently, there is a potential that Covenant delivery is focused only on the functions and policy areas explicitly mentioned within the scope, while other important areas, where members of the Armed Forces Community face disadvantage, could be overlooked, receiving less attention, resourcing or accountability. As such, the proposed extension of the Covenant to cover a wider range of policy areas could help to avoid a two-tier delivery. However, the extension needs to be supported with sufficient resourcing to enable effective delivery.

Within the [2025 Armed Forces Covenant Annual Report](#), it is highlighted that awareness and understanding of the Covenant principles remain inconsistent across those delivering the Covenant,

the wider public and the Armed Forces community. Whilst it is noted there has been significant progress and efforts made to increase awareness of the Covenant, more should be done alongside the extension of the Legal Duty to ensure that it makes a real difference. This includes:

- UK and Devolved Government stakeholders working together to reinforce and align Covenant delivery across national government,
- UK and Devolved Government stakeholders continuing to work with local areas to strengthen existing guidance, raise awareness and improve understanding of the Covenant
- Sustained improvement in training across Government departments, local authorities and service providers.

**Question 3: What impact will extending the scope of the Covenant Legal Duty have on service providers' ability to deliver on their obligations?**

**Question 3a: What are the resource implications of expanding the Covenant?**

Extending the scope of the Covenant Legal Duty has increased the likelihood of more consistent service delivery and reducing disadvantage by creating a stronger incentive for bodies within scope to review policies, build Covenant considerations into routine decision-making and policy-making, and, where local partnerships are in place, improve coordination and collaboration across relevant organisations. However, FiMT evidence suggests there are existing barriers that could impact whether service providers have the capability and infrastructure needed to implement the Covenant effectively, and whether support can match the scope of expansion.

**Workforce Capability: Turnover and Training**

Whilst significant progress has been made, our research has shown that disadvantage remains in several areas. This is often due to the high turnover of frontline staff who deliver services and the continued need to raise awareness of and train staff about the potential disadvantage that members of the Armed Forces community can face.

**Capacity and Resourcing: sustaining delivery infrastructure**

Research conducted during our earlier [A Decade of the Covenant](#) project showed that several local authorities did not have action plans for the Armed Forces Covenant, and fewer councils are able to afford a dedicated Covenant officer, with many posts dependent on external funding. A consistent theme from the research is the external pressures and constraints faced by statutory and non-statutory services, which impact on their ability to deliver the Covenant. Sharing best practices and building delivery models that optimise available resources is, therefore, important. More recent evidence from the [Our Community, Our Covenant and Beyond](#) project also indicates that many local authorities do not have the full infrastructure needed for strong Covenant delivery, which includes dedicated lead roles, Armed Forces Champions, active roadmaps or action plans, and embedded governance arrangements. Where these are not implemented or are reliant on short-term or external funding, Covenant delivery can become fragmented and person-dependent. Expansion of the Duty would likely increase demand for staff time for policy review and governance, roll-out of training, and for coordination across partners, creating a risk of an unfunded mandate unless implementation support is strengthened.

## **Navigating complex systems**

Within a workshop conducted by FiMT to discuss the extension of the Legal Duty with Gold Award holders of the Defence Employer Recognition Scheme (ERS), it was highlighted that inconsistent awareness and understanding of the Armed Forces community amongst public services providers can result in service-related disadvantage. Where frontline staff and services do not routinely recognise Armed Forces community status, opportunities to apply due regard and refer individuals to the most appropriate support systems can be missed. As such, an extension of the Covenant Duty would be welcomed as an enabler to mitigate this.

There is some good work being conducted, supported by MOD Guidance and the Covenant e-learning programme funded by Warwickshire Council and the Armed Forces Covenant Fund Trust, to increase awareness of the Covenant and the Armed Forces community, but it needs to go further. Where identification and signposting are inconsistent, individuals may not be referred to the most appropriate support at the earliest opportunity, increasing the risk of delayed interventions and avoidable escalation of need.

Disadvantage can also be seen when the Armed Forces community try to navigate these public services, in particular the bureaucracy that can be in place, and three-tier councils were provided as an example of this. There therefore needs to be clearer guidance and expectation management for Service personnel, leavers and families on where and how to access support and what they are entitled (or not) to under the Covenant.

## **Data and Identification**

Improvements in data collection, including via the Census 2021 and Scotland's Census, are a positive step forward in being able to identify and improve understanding of and support for the Armed Forces community. However, issues remain with data gathering at a local level. This can stem from either the Armed Forces community not being asked to identify within data collection methods or not understanding the importance and consequences of identification. This leads to inconsistent data capture, causing obstacles when identifying and addressing issues. Extension of the scope of the Covenant could increase awareness of the importance of consistent ask and record practices, shared data standards, and practical monitoring frameworks. The UK and Devolved Governments can further support this through the development of consistent monitoring and evaluation frameworks for local Covenant delivery, as well as through improving the accessibility of existing national data.

Overall, expansion is likely to strengthen consistency where providers have capacity to operationalise it; however, without additional implementation support, it may increase administrative burden and widen variation between areas.

## **Local government structures**

[\*Our Community Our Covenant and Beyond\*](#) report considered the impact of differing structures on Covenant delivery. The report looked specifically at single/unitary authorities, two-tier authorities, clusters and cross-authority collaborations, and combined, county combined and strategic authorities. In an accompanying [\*case study report\*](#), an analysis of five differing areas highlighted a selection of mechanisms that could be conducive to effective Covenant delivery in different local contexts, rather than providing a 'one-size-fits-all' approach.

Delivery of the Covenant is currently being shaped by a number of evolving political and structural changes, which may present both challenges and opportunities for local authorities in particular, as the scope of the Covenant is extended. This is coupled with the enduring impact of COVID-19 and the cost-of-living crisis on service delivery and need. These changes include the introduction of a regional VALOUR network and local government reorganisation. There will be a need for ongoing monitoring of this evolving context to assess its impact on the capacity of organisations to effectively deliver the Covenant.

#### **Question 4: What will be the impact of extending the Covenant Legal Duty to the Devolved Administrations?**

Extending the Covenant Legal Duty to Devolved Administrations could improve consistency of delivery and reduce the disadvantage experienced by the Armed Forces community, particularly as this cohort is highly mobile with in-service moves between the devolved nations. At a policy level, it also strengthens the requirement for policymakers to consider the Covenant when developing or amending policy. However, implementation must reflect different governance arrangements across the UK and the distinct Northern Ireland context. In recognising the distinct context in Northern Ireland, the [\*Our Community, Our Covenant and Beyond\*](#) research recommends dedicated research on Covenant delivery in Northern Ireland.

#### **Question 5: How far will the Bill improve implementation of the Armed Forces Covenant?**

By providing due regard to a wider range of policy issues and extending the Legal Duty to all UK government departments and Devolved Administrations, the Bill can significantly improve the implementation of the Armed Forces Covenant. However, as set out above in question 3, and highlighted within our research, [\*Our Community Our Covenant and Beyond\*](#), there are potential barriers which could impact upon the implementation of the Covenant as set out within the Bill. Research highlights persistent gaps on frontline awareness, identification at first access, data quality, communication and signposting, and consistency in strategic planning and understanding what constitutes good Covenant delivery. FiMT would urge relevant public bodies to take into consideration these barriers in order to ensure the most successful implementation.

Improved implementation requires more than just legislative strengthening; it also requires resourcing, strong infrastructure and accompanying tools. Our research recommends that Covenant delivery should be grounded in tangible, measurable outcomes, and evaluation plans should be integrated into delivery planning. In addition, the UK and Devolved Administrations should improve data accessibility and support consistent monitoring and evaluation frameworks. These enabling factors, alongside effective collaborative partnership models, are likely to ensure improved outcomes for the Armed Forces community.

To maximise the impact of any extension, there needs to be clear statutory guidance and expectation management for both providers and service users. This can be supported by resources such as the FiMT Armed Forces Covenant Toolkit, which sets out a core infrastructure to support Covenant delivery at a local and regional level. This includes an Armed Forces lead and/or champion, local partnerships, training, a roadmap or action plan, and effective communications with the Armed Forces community. In addition, more robust identification and data needs to be implemented through a consistent ask and record practice across public services, as well as the development of consistent monitoring and evaluation frameworks for local Covenant delivery.