

# Briefing on concerns relating to the Armed Forces Covenant and the extension of legal duties for public bodies in relation to the Covenant

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ForcesWatch is an independent organisation researching and raising public awareness about civil-military relations in the UK, and how these impact civil society. With the Armed Forces Bill putting the Armed Forces Covenant on a statutory footing for local authorities and other local bodies, we outline our concerns about aspects of the Covenant as it currently operates and explore the impact of the new legislation.

## Armed Forces Covenant

The Armed Forces Covenant was introduced in 2011 and legally requires the Secretary of State for Defence to report to Parliament annually on progress made supporting the armed forces community, largely in the areas of housing, education and health. The Covenant represents a significant change to civil-military relations in the UK as it creates, through local partnerships and projects, a formal commitment for civilian organisations to support the armed forces, in addition to reducing the disadvantage experienced by members of the armed forces.

Since 2011, almost all local authorities in the UK (with the exception of some in Northern Ireland) have signed the Community Covenant and nearly 7000 business, charities and other organisations have signed the Corporate Covenant. There are associated programs such as the Defence Employer Recognition Scheme and the Armed Forces Covenant Fund. The Fund provides £10 million annually from the MoD for projects across the UK while other funding comes from local sources. In addition to signing the Covenant, most local authorities also have an Armed Forces Champion and many have established civil-military partnership bodies.

## New legal obligations

The Armed Forces Bill 2021 includes a legal duty for local public bodies to have 'due regard' to the Covenant initially in relation to housing, education and healthcare, with the possibility of extension to other areas of service provision.

## Summary of concerns (see below for more detail)

### 1. Moral and financial responsibility for issues relating to service in the armed forces is shifted from central government to local bodies

The Covenant has shifted much of the responsibility and financial burden associated with addressing issues relating to the armed forces community onto local public bodies and away from central government. New legal duties are being given to local bodies but not to central government, although some of the issues that most affect the armed forces community are outside the scope of bodies working at a local level. The Covenant has already put a financial burden on local authorities and this could increase significantly with the new legislation.

### 2. The Covenant extends beyond reducing disadvantage for individuals to the promotion of the institutions of the armed forces more generally

While the Covenant seeks to reduce disadvantage for the armed forces community and veterans in access to services, signatories to the Covenant have also pledged to encourage support for the armed forces in their locality in a more general way, such as through Armed Forces Day or 'military ethos' events in schools.

### 3. The promotional element of the Covenant is beyond what should reasonably be expected from non-military public bodies, including schools and universities

Pledges to promote general support for the armed forces are an additional claim on resources that organisations can ill afford and falls outside of their core remit. While local authorities and other public bodies must factor in the particular needs of different sectors of the community, this should be balanced with their duties under equality, and other relevant, legislation. Supporting the armed forces in a general way tends to promote the institution rather than the individuals who serve in it. Public bodies, especially those charged with exploring issues from an educationally balanced and non-political perspective, risk uncritically promoting military institutions and approaches without the degree of balanced examination required.

### 4. Pledging to promote the armed forces is not conducive to decision-making which takes child rights, human rights and other considerations into account

The Covenant has changed the context within which local decisions about the interaction of the armed forces with children and young people at events and in schools are made, and actively encourages more armed forces involvement and recruitment activities. The sanitised image of military life which is presented in military recruitment marketing and at events masks the impacts of conflict and the harms that can be associated with an armed forces career, and reduces the space for healthy debate about military approaches.

### 5. Equality concerns

While recognising that the Covenant seeks to address inequality of access to services and opportunities by the armed forces community, it also raises its own equality concerns. In financially difficult times for local authorities and other bodies, resourcing provision for one sector of the community will inevitably lead to diverting it from other sectors. The principle of service provision based on need must be maintained in order to fairly balance the demands of the armed forces with other sectors of the community, and to avoid conflict with existing equalities and other legislation.

### 6. Concerns around the new legislation

- Additional legislation has not been justified, given the very high level of support for the Covenant from local authorities and guidance and schemes already in place.
- The legislation lacks detail and financial and other impacts are unknown. How will 'due regard' impact local flexibility and what will be the financial and policy impact as local authorities seek to meet their new legal obligations and address expectations of the armed forces community?
- The legislation will include powers to extend the bodies and functions covered. This would see the legal duty extended into less easily defined service areas, with numerous providers affected by new legal obligations which are outside of their core remit.
- The legislation undermines local autonomy and community cohesiveness. This is a particularly important issue in Northern Ireland but the push to create a unified show of support for the armed forces under the Covenant is also of wider concern, as it overrides community sentiment and experience about the impact of conflict.

## Amendments to the Armed Forces Bill 2021

### Amendment 1

This amendment, with amendments 2, 3 and 4, would place the same legal responsibility to have 'due regard' to the Armed Forces Covenant on central government and the devolved administrations as the Bill currently requires of local authorities and other public bodies. If legislation to confer a legal duty on public bodies is to go ahead, this should apply to national bodies as well as local. **We support the amendment in this context.**

## Amendment 6

This amendment would require the Secretary of State to set out how powers in the Bill could be used to widen its scope to address all matters of potential disadvantage for service personnel under the Armed Forces Covenant including employment, pensions, compensation, social care, criminal justice and immigration.

**We oppose this amendment** as we are concerned that extending functions covered by the legislation to a very wide array of bodies and organisations would have significant organisational and funding impact and raise equality concerns. At the very least, a considerable time should elapse to allow monitoring of how the legal requirements in the service areas currently proposed operate in practice. See 6.3. For the same reason, **we do not support Clause 8 section 343F (Sections 343AA to 343AD: power to add bodies and functions).**

## New Clause 7

This new clause will ensure that Commonwealth and Gurkha veterans applying for Indefinite Leave to Remain following four years of service will only pay the unit cost of an application. Acknowledging the role of this community in the UK armed forces was a 2019 Conservative manifesto pledge.<sup>1</sup> **We support this amendment.**

### 1. Moral and financial responsibility for issues relating to service in the armed forces is shifted from central government to local bodies

With its principle that the 'whole of society' is obligated towards the armed forces<sup>2</sup>, the Covenant has shifted much of the responsibility and financial burden associated with addressing issues relating to the armed forces community onto local public bodies and away from central government.

Currently the only legal duty placed upon the Secretary of State for Defence is to report to Parliament each year on matters relating to the Covenant. The new legislation will not extend the legal obligation for central government, but local public bodies (including local authorities, NHS Foundation Trusts, clinical commissioning groups and school governors) will become legally responsible for 'removing disadvantage' in wide areas of service provision. While decision-making about military and veteran affairs is made at a national level, responsibility for much of the additional provision necessary to mitigate the effect of serving in the armed forces will be further devolved to local bodies or military charities.

The metrics supplied in the Covenant annual report show that while most education indicators for service children are on a par with non-service children, it is frequent movement between bases which has the most effect on children's education.<sup>3</sup> There is more the MoD could do on this issue beyond legally requiring local authorities to mitigate the effects of its operations.

The Royal British Legion has highlighted that many of the areas in which personnel and veterans experience problems are the responsibility of national governments or are based on national guidance to delivery agencies.<sup>4</sup> Military accommodation falls outside the scope of local bodies and, despite a large investment programme, remains a significant issue. Resolving a number of issues associated with armed forces pensions is also a central government issue.<sup>5</sup> While the government are investing in transition and veterans issues, they also remain outside the scope of the new legal duty as the legislation does not apply to government departments.

**Amendment 1**, with amendments 2, 3 and 4, would place the same legal responsibility to have 'due regard' to the Armed Forces Covenant on central government and the devolved administrations as the Bill currently requires of local authorities and other public bodies. If legislation to confer a legal duty on public bodies is to go ahead, this should apply to national bodies as well as local.

The Armed Forces Covenant Fund distributes £10 million each year and additional one-off funding allocations to local bodies.<sup>6</sup> Most Covenant projects and structures will have some associated cost and some will have significant

budgets so this is clearly an insufficient amount of money to cover the whole of the UK. Over 60% of councils have indicated that more financial support would improve the delivery of the Covenant.<sup>7</sup> Despite passing much of the financial burden for service provision onto local bodies, there has been no discussion of how additional provision necessary to comply with the new legal obligations will be funded (see 6.2). Although the text of the Covenant states that 'the whole nation has a moral obligation' to the armed forces community, local communities can not be expected to provide a possibly limitless array of services in order to remove disadvantage or grant special consideration to one sector of the community, particularly within a context of underfunding and cuts across many sectors.

Councils have also put significant sums of money into events such as Armed Forces Day. Research indicates that local authorities have spent upwards of a quarter of a million pounds, with some spending up to twice this, for hosting the annual national Armed Forces Day event.<sup>8</sup> The MoD contribute just £25,000, a small proportion of overall costs. Asking local communities to foot the bill for a national event to celebrate the military, particularly as councils have been making cuts to local services at the same time, is not only unethical but undermines the service provision aspect of the Covenant in that the money could be far better spent.

## **2. The Covenant extends beyond reducing disadvantage for individuals to requiring the promotion of the institutions of the armed forces more generally**

While the Covenant seeks to reduce disadvantage for serving personnel, their families and veterans in access to services and opportunities, signatories to the Covenant also pledge to encourage support for the armed forces in their locality in a more general way, such as through Armed Forces Day or 'military ethos' schemes and cadets in schools. This has led some in civil society to express concern that the Covenant promotes military approaches and 'cultural militarism', as expressed by this quote from the Quakers in Britain:

*We are concerned that the bill is underpinned by and reinforces the assumption that war is inevitable rather than a political choice of a course of action....This may have a stifling effect on democratic discourse as society needs the freedom to question British military policy without fear of censure. The UK public are sceptical about war but highly supportive and compassionate towards the people in the armed forces. This is healthy, and the two should not be conflated.<sup>9</sup>*

Promotional activities are often presented as 'boosting the morale'<sup>10</sup> of serving personnel yet in practice they also serve a greater purpose of boosting public support for the military as a whole. Understanding how the Covenant benefits the institutions of the armed forces, from creating a culture of support for the military to enlisting civil society institutions in the resourcing and provision of services beyond what is provided by the government, helps bring into focus the political dimension of the shift in civil-military relations it has created.

## **3. The promotional side of the Covenant is beyond what should reasonably be expected from non-military public bodies, including schools and universities**

Pledges to promote general support for the armed forces (through events, military ethos in schools, cadets etc) are an additional claim on resources that organisations can ill afford and is outside of their core remit. While local authorities and other public bodies must factor in the particular needs of different sectors of the community, this should be balanced with their wider duties under equality and other relevant legislation.

Furthermore, supporting the armed forces in a general way tends to promote the institution rather than the individuals who serve in it. Public bodies, especially those charged with exploring issues from an educationally balanced and non-political perspective, risk uncritically promoting military institutions and approaches without the degree of balanced examination required.

The Defence Employer Recognition Scheme 'encourages employers to support Defence and inspire others to do the same'. Of the 76 universities that have signed the Corporate Covenant (May 2021), 35 have achieved a gold or silver award under the scheme.<sup>11</sup> 'To obtain a Gold Award, organisations must be an exemplar within their market sector, advocating support to Defence People issues to partner organisations, suppliers and customers with tangible positive results.'<sup>12</sup> Is 'support' of defence a desirable aim for an educational organisation charged with developing critical thinking across a range of subject areas?

Many schools have signed the Corporate Covenant. As well as supporting service family children, reservists and military spouses into employment, and veterans into teaching, many schools have pledged to support the government's 'military ethos' initiatives in schools including the Cadet Expansion Programme, and support community cadets. They also pledge to actively participate in Armed Forces Day. What is the impact of a school aligning itself to one public institution, especially one that can divide the community as the military does?

#### **4. Pledging to promote the armed forces is not conducive to decision-making which takes child rights, human rights and other considerations into account**

Public outreach activities undertaken by the armed forces are about far more than developing understanding, as stated in the Covenant. They also serve to create acceptance of military approaches and to generate new recruits. It is easy to lose sight of the damaging effects of military conflict, on all sides, when a public show of support for the military normalises armed intervention and reduces the space for public debate.

Our research into military recruitment explores how armed forces marketing presents a sanitised image of military life that masks the impact that armed conflict can have on individuals.<sup>13</sup> Similarly, armed forces presentations and displays in schools, at community events and recruitment stalls allow an engagement with children and young people in a promotional way that does not reflect the risks, legal obligations and ethical issues involved with military service, contributing in the long term to the overall harm associated with it.

We have worked with groups working for peace in their communities to challenge their local authorities for allowing recruitment stalls with weaponry and military vehicles in public spaces, and at Armed Forces Day and similar events. Such displays attract young people of recruiting age but also much younger children. When challenged, some councils have cited their pledge under the Armed Forces Covenant as reason for allowing the display of weapons to a young impressionable audience to continue.<sup>14</sup> With growing need for an active dialogue with young people around violence, most urgently because of deaths and injuries due to knife crime, a wider conversation about the allure of weapons is vital.

The Armed Forces Covenant has changed the context within which such local decisions are made. With no 'peace champions' or remit to address education about peace and associated issues in schools, there are no voices to counter those promoting the armed forces in local areas.

#### **5. Equality concerns**

While recognising that the Covenant seeks to address inequality of access to services and opportunities by the armed forces community, it also raises its own equality concerns. There is a risk of erosion of the commonly held principle that public services are based solely on need. The financial difficulties faced by local government have created funding deficits for local services and channelling more of it towards armed forces communities will necessarily divert it away from others groups in need. It should also be taken into account that other public sector workers are no less deserving of special consideration.

While elevating provision for the armed forces may be appropriate in very particular circumstances, applying this in a more general way is problematic. For example, the significant physical and mental health care needs of the armed forces community should be accommodated within local health provision but priority access to more routine

provision within civilian healthcare would create a unjustifiable two-tier system. In relation to employment, the Conservative manifesto pledge to offer a guaranteed job interview for veterans for any public sector role they apply for is impracticable and a burden on employers and potentially in contravention of equality legislation.

The focus on addressing inequality in one sector of the community risks privileging the armed forces, and may be in conflict with, or need to take into account of, existing equalities and other legislation, as COSLA (Convention on Scottish Local Authorities) note with regard to the Fairer Scotland Duty<sup>15</sup> and WLGA (Welsh Local Government Association) note with regard to differing legal systems and legislation in place in Wales such as the Future Generations Act and Housing Act.<sup>16</sup>

The public are already generous towards the welfare needs of serving personnel and veterans but if a sense of prioritisation of the armed forces develops, it is not in the best interests of the armed forces community, or wider society, over the long term. Reinforcing this with legislation could, as the Scottish Veterans Commissioner notes, risk further alienating the population from the military (see 6.1).

## 6. Concerns around the new legislation

The Armed Forces Bill 2021 introduces new legal obligations associated with the Armed Forces Covenant:

- Public bodies will have a **legal duty to have 'due regard'** to the Armed Forces Covenant.
- The initial focus will be on housing, healthcare and education but the legislation will allow **expansion to other services** in the future (without further primary legislation).
- A **'legislative consent motion'** is being sought to extend the law to devolved nations.

### 6.1 Additional legislation has not been justified

The Covenant annual reports, those from other organisations, and submissions received by the Committee, show that many Covenant projects and structures are already in place. Submissions from the UK's local authority associations question the need for a new law, and what the impact will be, because the legislation lacks detail. COSLA also notes that the legislation is not well adapted to the Scottish education system<sup>17</sup> and WLGA suggest that, as the policy areas are all devolved matters, 'timely and constructive engagement' is imperative.<sup>18</sup>

The Scottish Veterans Commissioner also noted the lack of justification for the legislation and the wisdom of creating a new legal duty. They ask, 'Does not imposing a new law on only specified public bodies, which may be vague and open to interpretation, risk further alienating the population from the military?'.<sup>19</sup>

LGSCO (Local Government and Social Care Ombudsman) already deals with complaints related to the Covenant and they note that they have only had 36 complaints referencing it since 2015, of which 17 were upheld.<sup>20</sup> This low number may partly be due to lack of awareness about the ombudsman, but that could be remedied with more high profile information.

The Minister for Veterans (no longer in post) stated in Parliament that the legislation will 'not specify outcomes, but simply ensures that a set of principles is adhered to'.<sup>21</sup> Yet, with the exception of a handful of councils in Northern Ireland, all local authorities have signed the Covenant along with local partner organisations. In 2016 the *Our Community – Our Covenant* report explored how councils have different levels of response based on the size of the armed forces community in their area.<sup>22</sup> Overall, there was already a high level of adherence to the Covenant; for example, around three quarters of local authorities offered special entitlement to social housing (figure 17). Some councils wanted more guidance and financial support. The government subsequently issued general guidance and in 2020 issued statutory guidance on improving access to social housing for the armed forces community.<sup>23 24</sup>

In response to a Parliamentary petition calling for the Covenant to be enshrined in law, which did not attract enough signatories for a debate, the government stated that it is 'concerned that the current legislation is not enough in itself to ensure the future of the Covenant'.<sup>25</sup> This suggests that, despite all the Covenant work already being done, the government feels a political need to secure it in legislation, and this takes precedence over providing justification for the legislation.

## 6.2 The legislation lacks detail, and financial and other impacts are unknown

How will employing the concept of 'due regard' operate in practice? Will it allow for local flexibility as suggested by the Minister or will it raise demand and expectations beyond what is possible or desirable for local bodies to deliver? How will local bodies adequately demonstrate 'due regard', and how much more will that cost? How will a public body be challenged if it is alleged to not be showing 'due regard', how will this be assessed and what enforcement process would ensue?

Draft statutory guidance to local bodies on adherence to their new legal duties was provided to the Armed Forces Bill Committee at a late stage so it was not available for their scrutiny.<sup>26</sup> The guidance is at a very early stage and likely to undergo considerable change although it is a fundamental part of understanding the legislation's mechanics and how it will affect local public bodies.

All local authority associations expressed concern about the likely financial implications. COSLA has stated that it is 'of paramount importance that potential additional resources are fully funded by national government and kept under review'<sup>27</sup>, and this is echoed by the WLGA who also state that 'the short term and limited nature' of the Covenant Fund is inadequate.<sup>28</sup> The *Our Community – Our Covenant* report identified that there is already a need to manage expectations of the armed forces community about what the Covenant is designed to achieve. COSLA are concerned that the legislation is likely to increase expectations and demand from the armed forces community and are critical of the MoD consultation process for drafting the legislation and assessing resource implications.

## 6.3 The legislation will include powers to extend the bodies and functions covered

The new legal duty to have 'due regard' covers the three core areas of service provision on which the Secretary of State must currently report to Parliament: housing, education and health.

However, new powers under Clause 8 of the Armed Forces Bill would allow the Secretary of State to extend the bodies and functions covered by the legislation. This would open up the possibility that in time many more areas of public activity must pay 'due regard' to the needs of the armed forces and veteran community, with a further increase in the financial and expectation obligations identified by the local government associations (see 6.2).

**Amendment 6** asks the Secretary of State to assess which other service areas could be included to extend the bodies and functions covered by the legislation. We recognise that this is seen as a mechanism to address other areas of disadvantage faced by the armed forces community but are concerned that this would see the legal obligation extended into less easily defined areas of service provision. An 'employment function' or 'social care function' could be interpreted very widely with numerous service providers across society, or individuals and organisations in that role, affected by new legal obligations which are outside of their core remit. While there may be specific issues for which consideration of an individual's service career is appropriate, for example in relation to the immigration status of foreign and Commonwealth veterans,<sup>29</sup> this is the exception rather than the rule and should not require reference to the Covenant for fair treatment. These instances can be dealt with by policy change or amendments to current legislation, as with the amendment to the Housing Act 1996 which removed the local connection test for the armed forces.<sup>30</sup> This is proposed with the change to the Immigration Act 2014 in **New Clause 7**.

We are also concerned that, in time, powers to expand the bodies and functions covered by statutory duties could result in the legislation being extended to create a legal obligation for public bodies to show and encourage general support for the armed forces.

## 6.4 The legislation undermines local autonomy and community cohesiveness

With a new legal requirement to show 'due regard' it is likely that councils and other public bodies will feel further obliged to put additional resources into services for the armed forces community and into events and other shows of support for fear of contravening their statutory duty.

In the Armed Forces Bill Committee the Minister referred to the knowledge and understanding that local authorities have of their communities to justify the exclusion of central government from the legislation. However, local understanding does not just apply to the needs of the local armed forces community. Wider sensibilities of different parts of the community must be considered, a point made by the LGA: 'How councils respond to the Covenant will vary depending on local circumstances and the population profile'.<sup>31</sup> All local authority associations call for flexibility in how local bodies deliver the Covenant. The *Our Community – Our Covenant* report explored how different localities have different levels of response to the Covenant based on the size of the armed forces in their area; this is also likely to be influenced by community experience and feeling on issues associated with the military.

This is perhaps most evident in Northern Ireland where six of the eleven local authorities have not signed the Armed Forces Community Covenant. The political landscape is a key factor.<sup>32</sup> Requiring local authorities to observe the Covenant by law in this case is insensitive to the history of the relationship of the area to the British Army and risks inflaming tensions. As pointed out by the Veterans Commissioner for Northern Ireland, some of the benefits that are offered to veterans in other parts of the UK but not available in Northern Ireland fall outside of the Covenant, such as the veterans rail card.<sup>33</sup>

More widely, local autonomy for councils to make decisions appropriate for their communities will be undermined by the demands of the Covenant. This is particularly important in relation to encouraging public shows of support for the armed forces. Military action is a highly political and divisive activity, and a spectrum of views and lived experience are represented in any community and workforce. This is reflected in research showing that there is often a lack of support for military action overseas but a high regard amongst the public for serving personnel and veterans.

This spectrum of opinion and experience must be respected, particularly where significant parts of the community have personal experience of the damage caused by military conflict elsewhere in the world. Attempting to create a unified show of public support for the military risks creating division in the community; backing this up with statutory duties could exacerbate it.



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- 2 Ministry of Defence (2020), Armed Forces Covenant Annual Report 2020, <https://www.gov.uk/government/publications/armed-forces-covenant-annual-report-2020>
- 3 MoD, 2020
- 4 Royal British Legion (2021), submission to the Armed Forces Bill Committee, <https://committees.parliament.uk/writtenevidence/24850/pdf/>
- 5 Veterans Commissioner for Northern Ireland (2021), submission to the Armed Forces Bill Committee, <https://committees.parliament.uk/writtenevidence/24848/pdf/>
- 6 MoD, 2020
- 7 Local Government Association, Forces in Mind Trust & Shared Intelligence (2016), *Our Communities Our Covenant*, <https://s31949.pcdn.co/wp-content/uploads/our-community-our-covenant.pdf>. Figure 18.
- 8 Data received via FOI requests (available from ForcesWatch) and local authority budgets in the public domain.
- 9 Quakers in Britain (2021), submission to the Armed Forces Bill Committee, <https://committees.parliament.uk/writtenevidence/23947/pdf/>
- 10 MoD (updated 2019), Armed Forces Covenant for Communities guidance, <https://www.gov.uk/government/publications/armed-forces-community-covenant/armed-forces-community-covenant>
- 11 MoD, Businesses who have signed the Armed Forces Covenant, <https://www.gov.uk/government/collections/armed-force-corporate-covenant-signed-pledges>
- 12 MoD, 2020
- 13 ForcesWatch and Medact (2019), *Selling the Military: A critical analysis of contemporary recruitment marketing in the UK*, <https://www.forceswatch.net/resource/selling-the-military-a-critical-analysis-of-contemporary-recruitment-marketing-in-the-uk/>
- 14 ForcesWatch online resource, *Kids with Guns*, <https://www.forceswatch.net/resources/kids-with-guns/>
- 15 COSLA (Convention on Scottish Local Authorities) (2021), submission to the Armed Forces Bill Committee, <https://committees.parliament.uk/writtenevidence/25204/pdf/>
- 16 WLGA (Welsh Local Government Association) (2021), submission to Armed Forces Bill Committee, <https://committees.parliament.uk/writtenevidence/23948/pdf/>
- 17 COSLA, 2021
- 18 WLGA, 2021
- 19 Scottish Veterans Commissioner (2021), submission to the Armed Forces Bill Committee, <https://committees.parliament.uk/writtenevidence/23959/pdf/>
- 20 LGSCO (Local Government and Social Care Ombudsman) (2021), submission to the Armed Forces Bill Committee, <https://committees.parliament.uk/writtenevidence/23769/pdf/>
- 21 Hansard, 1 February 2021, vol 688, c668.
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- 25 <https://petition.parliament.uk/petitions/332503>
- 26 Armed Forces Covenant Statutory guidance framework (draft) <https://committees.parliament.uk/publications/5343/documents/53226/default/>
- 27 COSLA, 2021
- 28 LGA (Local Government Association) (2021), submission to the Armed Forces Bill Committee, <https://committees.parliament.uk/writtenevidence/23507/pdf/>
- 29 <https://www.theguardian.com/uk-news/2019/apr/24/scrap-uk-visa-fees-commonwealth-veterans-mps-urge>
- 30 Ministry of Housing, Communities & Local Government, 2020
- 31 LGA, 2021
- 32 Veterans Commissioner for Northern Ireland (2021), submission to the Armed Forces Bill Committee, <https://committees.parliament.uk/writtenevidence/24848/pdf/>
- 33 Veterans Commissioner for Northern Ireland, 2021