

## VETERANS' LEGISLATION REFORM AWWNSW SUBMISSION – MAY 2023

Australian War Widows NSW Ltd (AWWNSW) would like to thank the Australian Government for the work it is doing to harmonise and reform the legislative framework that governs veteran entitlements. This isn't an easy task and AWWNSW welcomes the work and initiative of the Government to take on this challenge with a view to producing better outcomes for veterans and their families.

### SECTION ONE: ORGANISATION OVERVIEW

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1. AWWNSW was established in 1946 for the purposes of teaching war widow's skills to earn income in their own right post World War 2. Originally established as an incorporated association in NSW, the organisation made the transition to a Company Limited by Guarantee in 1999. This transition allowed it to offer its programs, services and support to all widows, no matter their geographical location. Indeed, today widows and veterans' families access our organisation from around Australia.
2. AWWNSW is undergoing a significant transformation. On 23 September 2021 the objects of AWWNSW changed for the very first time. The purpose of AWWNSW is now *"to provide support for **all members of the veteran community** (including war widows, veterans of the Australian Defence Force, their spouses, parents, grandparents, children, and siblings) who are disadvantaged or in need due to poverty, distress, suffering, misfortune, or helplessness (Veteran Community)."*
3. AWWNSW has a particular focus on supporting and advocating for veterans' families. This is not a new focus for the organisation as war widows are the families of our veterans. What is new is the breadth of that focus. While traditionally limited to war widows, AWWNSW now advocates for and offers its programs and services to all veteran families, no matter their connection to the Australian Defence Force (ADF).
4. These changes rightly acknowledge that war widows are already an important part of the veteran family community and AWWNSW's evolution will ensure that it can focus on the entire journey and experiences of veterans' families. It will also ensure that war widows remain connected to their defence family and can continue to be recognised and properly



## VETERANS' LEGISLATION REFORM AWWNSW SUBMISSION – MAY 2023

supported. Importantly, it ensures that it doesn't take a tragedy to ensure that veterans' families are seen, heard, and supported.

5. As part of its evolution, AWWNSW will be changing its organisation name in the near future to better reflect what it does and who it supports. Importantly, AWWNSW does not and will not through its evolution, replicate services that already exist within the veteran community. AWWNSW has always offered complementary services to other organisations and is already working in collaboration with leading organisations such as RSL and Legacy.

### *Governance Structure*

6. AWWNSW is the oldest Australian organisation that was established and built by veterans' families, for veterans' families. The functions and rules that govern AWWNSW are outlined in the Company's constitution which is publicly available. AWWNSW's business structure and charitable status means that it is accountable to its members for its performance and is regulated by the Australian Charities and Not-for-profits Commission. Directors are also regulated by Company Law in Australia and the Australian Securities and Investments Commission.
7. As a charity and a company, AWWNSW reports publicly its financial and business performance. AWWNSW is governed by a Board of Directors. The Board consists of 9 Directors, 6 of whom are elected to their positions and 3 that are appointed for their skills and experience. The Board provides strategic oversight of the organisation, setting the strategic direction and ensures that the organisation has the resources it needs to service its community. The Board must always consist of a majority members, given that AWWNSW is a member-based not-for-profit.
8. The strength of governance processes and practices within the organisation continues to grow. Over the last 12 months the Board has focused on ensuring sound and robust decision-making practices and introduced new measures to strengthen accountability and financial management.



**VETERANS' LEGISLATION REFORM  
AWWNSW SUBMISSION – MAY 2023**

9. AWWNSW is currently a member of Australian War Widows Inc. This organisation is made up of remaining war widows-based organisations in Australia. The views and positions represented in this submission are those of AWWNSW and do not represent the views of Australian War Widows Inc.

***Services and Support***

10. AWWNSW provides peer connection and social support to veteran families through the following programs and services:

- Social Clubs
- Our Space ACT
- Our Space Online
- Our Space Sydney
- Friendship line; and
- Special events.

11. AWWNSW provides wellbeing and community services for veterans' families through the following programs:

- Online Yoga
- Digital literacy development
- Social work services including system navigation and connection; and
- Case and complex issue management.

12. AWWNSW provides advocacy and recognition support to veterans' families through:

- Community town halls and consultation events
- Participation in reviews, forums and roundtables that contribute to policy development
- Making of submissions to important reviews impacting veterans' families
- Leading the implementation of War Widows' Day in NSW
- Delivering the only annual commemorative event that puts war widows at the centre of the service; and
- Increasing awareness of the role and needs of veteran families.



**VETERANS' LEGISLATION REFORM  
AWWNSW SUBMISSION – MAY 2023**

SECTION TWO – ADVOCACY & THE ROLE OF VETERAN FAMILIES

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13. AWWNSW's advocacy priorities are developed through consultation and engagement among veteran families groups. Advocacy priorities centre on ensuring the families of veterans are included, engaged and supported so that they in turn can continue to support Australia's Defence and Veteran System. Strategically, AWWNSW is seeking:
- mental health support for veteran families, particularly for children of veterans, carers and spouses of veterans
  - equity in the application of legislation, policies and services that apply to veteran families; and
  - meaningful recognition and engagement within the veteran system at all levels.
14. The Australian Government, together with the Department of Defence has set some very important strategic priorities to secure the peace and security Australia currently enjoys. Australia really is the 'lucky country' in many ways, perhaps most notably because of the volunteer nature of its Defence Force. In Australia there are thousands of individuals who are willing to hand over every aspect of their lives including, the pursuit of their individual desires, their freedom of choice and commit part of their lives to serving Australia's needs. This is not only admirable but incredibly important for all citizens, for without these people the nature of Defence Service in Australia would need to be very different.
15. One of the most important strategic priorities is a very large increase in the size of the Defence Force, a target which almost seeks to double the personnel who wear our nations uniform. This is ambitious and challenging when the veteran system already has a long way to go to meet the needs of veterans and expectations of the Australian people.
16. Despite the nature of their service, veterans do not exist within a vacuum. Veterans, like their civilian counterparts, exist within multiple systems of support that enable their service. As Australians we must do all we can to protect and promote the enablers to service in the ADF. A fundamental enabler to service in the ADF has and always will be the families of our veterans. Data from successive defence census and family surveys show the main reason people choose to leave the ADF is due to the impacts of that service on their families. Families



## VETERANS' LEGISLATION REFORM AWWNSW SUBMISSION – MAY 2023

help them join, stay in, serve and when the time is right transition them back into civilian life. Families care for veterans if they become unwell due to their service and are the ones left behind and left out when a veteran passes away. Families in all their forms are the constant in a veteran's life, they are without doubt a protective factor and have positive impacts on transition and wellbeing outcomes for veterans.

17. However, in Australia, only a small segment of the veteran family community is supported or provided for within the veteran system. Even then, the support is limited and does not properly recognise the role they play, the burdens they bare and the impacts of the unique nature of military service has upon them. There is limited relief offered for veterans' families, yet the system and the institutions within it continue to expect families to take on more and more when it comes to enabling ADF service and caring and supporting veterans following that service. They are expected to:

- be single parents
- move around the country
- have long distance relationships
- have and maintain a job
- not get sick
- meet the veterans' every need
- support veterans emotionally and sometimes financially; and
- manage the emotional and mental load of their families and the list goes on.

18. While it is pleasing to see progress being made to enhance support available to veterans and the closure of gaps in the system, it is fundamentally important to ensure that veteran families are not forgotten in all of the reform work. Progress in this area of veteran policy and support has been glacial.

### SECTION THREE – VETERANS' LEGISLATIVE REFORM PATHWAY

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19. AWWNSW has developed this submission through consulting with veteran families from around Australia.



## VETERANS' LEGISLATION REFORM AWWNSW SUBMISSION – MAY 2023

20. AWWNSW's consultation approach involves engaging directly with its community and consolidating insights gathered through direct engagement with veteran families in a variety of forums. To its written request for views on the legislation reform specifically, AWWNSW received 111 responses.
21. AWWNSW also dedicated two of its virtual veteran family town halls to the discussion of this reform. Through these forums AWWNSW engaged 15 veteran family members in detailed discussion on the reforms proposed. Each area of reform is discussed below.
22. Through the views and submissions expressed below, AWWNSW is also amplifying the voices of veteran families with whom it has engaged over the last 2 years.

### *Establishing a Ministerial Advisory Council*

23. AWWNSW supports the establishment of this Council. AWWNSW submits that there ought to be representation on this Council for veteran families. The Council and its members must be able to communicate directly with those it represents, and it is important that those it represents can also communicate with their representatives.
24. AWWNSW submits that the Council ought to contain leaders within the community who are recruited through a merit-based process to ensure transparency in appointment and offer all of those within the community the ability to apply. The ACT Government's Ministerial Advisory Council for Veterans and their Families provides a good model, which could be leveraged for this Council both in terms of recruitment of members, Terms of Reference and function.

### *Merging the Commissions*

25. AWWNSW considers this is necessary with the decommissioning of the legacy Acts. AWWNSW submits that the government ought to consider making the following amendments to the section of the Military Rehabilitation and Compensation Act (MRCA) that governs the Military Rehabilitation and Compensation Commission (MRCC), specifically:



## VETERANS' LEGISLATION REFORM AWWNSW SUBMISSION – MAY 2023

- Expanding the MRCC's remit to include veteran family needs and considerations.
  - Including the capacity for the Commission to consider submissions from the veteran community sector and advocacy bodies regarding the operation of the MRCA, claims consideration and policy development; and
  - Enhance the transparency, accountability and responsiveness of the MRCC. The MRCC operates with unclear external accountability and transparency. Many veterans and their families don't understand what it is, its role and its responsibility. Many veterans and their families confuse the Commission with DVA. With the Commission established under the MRCA, it ought to report separately to DVA and be accountable to the public for its functions. There ought to be a separation between the Department and the Commission in order to achieve this outcome.
26. The way the MRCC operates needs to be reviewed as part of the reform work. As mentioned above, the opportunity for the community sector to engage with the Commissions, to make submissions and co-develop policy is limited. The Commissions do not adequately communicate with the community sector resulting in missed entitlements.
27. A good example of this was the passing of the Military Rehabilitation and Compensation (Special Assistance) Instrument in February 2022. In this instance, the community sector was not made aware of the introduction of this instrument nor were the families of veterans and neither were the frontline DVA staff. As a result, Gold Cards were removed from children, who under this instrument ought to have retained them. This caused, in one case, the disengagement from treatment for a child with a severe mental illness and an immeasurable amount of stress and pressure on the child's widowed mother. It took AWWNSW raising the case with DVA more than 12 months post the passing of this instrument for this critical error to be realised and corrected. AWWNSW understands that DVA is now developing a process to apply this instrument and it is reviewing cases where it may apply. This case however ought to never have occurred and highlights problems with the Commission's model.



## VETERANS' LEGISLATION REFORM AWWNSW SUBMISSION – MAY 2023

### *Enhancing the role of the Veterans' Review Board (VRB)*

28. AWWNSW is encouraged to see that there have been improvements to the way that VRB decisions are now being implemented within the Department, however it is important that changes to the appeals process be considered alongside the final report of the Royal Commission into Defence and Veteran Suicide (Royal Commission).
29. Claims appeals and the role of the VRB have been discussed in testimony at the Royal Commission and therefore this area for reform ought to be considered in light of that evidence and indeed the views of the Royal Commission.
30. Similar to the submissions made on the MRCC, AWWNSW considers that there is a need to review the model of the VRB and enhanced alongside the reform work. In AWWNSW's experience, there has been inconsistent implementation of VRB decisions, an inability for the VRB to consider applications/reviews holistically resulting in the impact of its decision making further complicating other claims being considered by the MRCC and/or resulting in them being unnecessarily denied.
31. A good example of the above situation is the case of a widow whose veteran partner had multiple claims at different stages of review, reconsideration, and appeal. The claims were being considered by the VRB in isolation from each other at differing points in time. The Department inconsistently implemented determinations following VRB decisions; all of which has resulted in a death claim for the veteran being denied and the widow on the appeal 'train' with no outcome over 8 years since the veteran's passing.

### *Including Presumptive Liability in the MRCA*

32. AWWNSW welcomes the inclusion of presumptive liability provisions into the MRCA. The streamlining of as many claims and conditions as possible can only enhance the experience of veterans and their families as they move through the initial liability claim process.





**VETERANS' LEGISLATION REFORM  
AWWNSW SUBMISSION – MAY 2023**

33. AWWNSW would also like to see death claims included in these provisions, to provide delegates with the ability, where certain conditions are met to streamline the processing of death claims.
34. AWWNSW appreciates setting the conditions for presumptive liability for the passing of a veteran are difficult and are likely best co-designed through policy development and the introduction of subordinate legislation. However, it is important that the new MRCA contains the ability for death claims to be included within this class of claim.
35. AWWNSW would welcome the opportunity to work with the Government and other stakeholders to develop the criteria for presuming liability in the case of the death of a veteran.

***Legislative Framework Reform***

36. AWWNSW welcomes the Government's proposal to consider all new claims after a particular date under MRCA. AWWNSW agrees with the Government's position that the best Act to carry forward the veteran system is the MRCA, particularly noting that it can apply to current and former serving members of the ADF.
37. While the proposed pathway for legislative reform seeks to bring about change quickly to assist in reducing the claims backlog, AWWNSW submits that reducing the claims backlog will not fix the larger systemic issues, nor will it mitigate the very real risk that this costly exercise will need to be repeated in the near future.
38. Therefore, this reform is also an opportunity to fine tune elements of the MRCA to ensure that it is able to be applied flexibly to meet the current and emerging needs of veterans and their families. AWWNSW submits that there are a number of elements the Government could consider when it is amending the MRCA including:



**VETERANS' LEGISLATION REFORM  
AWWNSW SUBMISSION – MAY 2023**

- ***Recognising veteran families and their role in the new legislative framework, in the Act's preamble and second reading speeches.***

Meaningful support and engagement of veteran families commences with recognition. To date, difficulties in defining veteran families has led to their lack of inclusion and engagement.

AWWNSW has used the Australian Bureau of Statistics definition of family. AWWNSW also includes a list of familial relationships which it considers part of the veteran family in its definition. These relationships include current and former spouses, biological and/or stepparents, siblings, children and grandparents. AWWNSW encourages all other veteran organisations, including DVA and Government to adopt a similar approach.

The failure to agree on a definition of family has for too long provided a barrier to their recognition and support. Not only would including a definition of family reduce the need to call widowed partners “wholly dependent partners” but it would also provide the means for policy to be developed and scoped. It would unite the various segments of the veteran family community and help them identify themselves as being part of a community of families.

It would provide the means for their engagement, needs to be considered and where possible provided for. It would give them visibility within a system that currently doesn't see or hear them.

- ***Ensuring the children of veterans have access to mental health treatment by removing legislative barriers to that treatment and including a framework to provide a treatment card to these children.***

Recognising that children of war veterans and bereaved children are at greater risk than their civilian counterparts of experiencing mental health challenges due to their parent's service, the nature of that service and the impacts of that service on the veteran and the household. Provision ought to be made for the meeting of their psychological needs.

Access to counselling through Open Arms is insufficient to meet what are often intense psychological needs to mitigate the impacts of adverse childhood experiences. Children of war



## VETERANS' LEGISLATION REFORM AWWNSW SUBMISSION – MAY 2023

veterans and deceased veterans have very little choice in the environments they grow up. Evidence collected throughout the Royal Commission and the Vietnam Veterans Families Study indicates the psychological needs of these children and the link to war and defence service are high. Yet there is limited support provided to them. AWWNSW would like to see the development and implementation of a model of care for the children of war veterans, similar to the model used to support the children of Vietnam Veterans, but this model would focus on their mental health needs.

It is important that we are providing the means to mitigating the impacts of war and defence on these children as early as possible to reduce larger costs and social burdens as these children grow up without the skills they need to manage their own wellbeing.

- ***Including veteran family engagement and a role for DVA in the provisions that govern Transition Support.***

A fundamental problem in the provision of transition support and services has been the lack of meaningful engagement of veterans' families in the process, resulting in poor communication and coordination of transition services and entitlements. During transition, families are living with the significant uncertainty alongside their veteran. For families, their whole household dynamics and relationships change during this period which isn't necessarily time-bound. Engaging families is more than just including them in information sessions and booklets. It is about understanding how the transition from the ADF will impact them and their veteran, the needs this period generates for the families and identifying avenues to address those. There is an unspoken expectation that ADF families will do what is required and that they too will fall in line with Defence's processes. The expectation exists yet families are not engaged or supported and are not meaningfully considered or included in processes and support services.

In 2018, the joint Defence/DVA Transition Taskforce found that barriers to an effective transition included:

- Prolonged periods of instability and uncertainty
- Complex and fragmented approaches by government agencies; and
- Unrecognised and under supported families.



## VETERANS' LEGISLATION REFORM AWWNSW SUBMISSION – MAY 2023

These barriers are still relevant five years later and could be reduced by amending the MRCA to include a requirement for family engagement and making transition a joint DVA and Defence responsibility under the Act.

- *Removing legislative barriers that cause inequity within the provision of entitlements that create a rigid system that reduces availability of services and support. Moving toward greater flexibility and a needs-based approach to the provision of entitlements.*

Within the MRCA, multiple provisions deal with providing services to veterans and their families, such as Household Services and Family Support, prescribe limits and service lists which result in DVA's flexibility to respond to new and emerging needs of veterans and their families being limited.

Dealing first with prescribed limits, caps on funding available to deliver support services to veterans and their families ought not be placed in legislation but in policy. Placing the limits in legislation mean that shifts in the economy reduce a veteran's capacity to access the (for example) in home help and support they require. Currently there is a prescribed cap within the MRCA for Household Services of \$330. In the current economic environment this pool of funds results in less hours of service than in more favourable times. If the intent is to ensure equitable distribution, then a needs-based model is the more favourable alternative. If there are needs to place funding caps on service provision, doing so through policy instruments enables the Government and its departments to respond as circumstances change in a much more cost-effective manner than amending legislation.

The impacts of prescribing service lists within the family support section of the MRCA also need to be considered. While the legislation references that the prescription does not limit the services that could be provided, the reality is that in implementing the services it does limit what is available. In lieu of listing support available, an assessment of need undertaken by suitably qualified persons including social workers ought to be undertaken. If the appetite for this change is limited, then amendments to the current list ought to be considered. Amending 'counselling' to mental health support opens up the types of support which would more meaningfully meet the needs of veteran families. Provision for home and dwelling maintenance should also be included



## VETERANS' LEGISLATION REFORM AWWNSW SUBMISSION – MAY 2023

to ensure that veterans and their families are living in premises that are safe and they have access to maintenance support when needed to prevent crisis situations.

Most importantly, a needs-based approach to the delivery of entitlements, services and support ought to be included in the legislative framework. Again, this allows for appropriate flexibility when required and enhances responsiveness to change. A fundamental strategic problem for the Veteran and Defence Personnel portfolios has been an inability to predict and keep pace with the changing needs of veterans and their families. The system is constantly in 'catch up mode' and is unfairly restricted by its governing framework. This results in a succession of costly reviews, consultations and reports that achieve little in terms of reform. It is imperative that ways to introduce flexibility within the system in a responsible way be considered and a needs-based approach is one way. It is a way that puts veterans and their families at the centre of the system built for their support in recognition of what they have forgone for Australia's benefit and prosperity.

- ***Update the language within the attendant care support provisions to better reflect community need and understanding.***

Attendant care compensation provided through the MRCA ought to be updated to reflect current community understanding and expectation. Currently there is limited support available to carers of veterans under the MRCA. The attendant care provisions provide a pathway to provide support to carers, however this pathway isn't clear to the carers themselves, advocates or DVA staff. AWWNSW asks that the Government consider amending the attendance care provisions and replacing those terms with carer support. Further, noting the changing demographic of veterans and their families, consideration ought to be given, if not now, into the future for compensation available to carers of veterans for time taken off work to attend medical appointments, DVA assessments and in providing care to veterans.

The change in language would be a very meaningful first step in recognising the support that families and carers provide to veterans who are wounded, injured and ill as a result of their service and the unpaid support and work they undertake keeping veterans out of care facilities and enhancing their wellbeing and transition outcomes.



## SECTION FOUR – OTHER CONSIDERATIONS

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39. The legislation reform pathway is a critical step in improving outcomes for veterans and their families. It is a significant opportunity for reform and change and alongside the Royal Commission into Defence and Veteran Suicide, AWWNSW is very pleased to see the attention and focus being given to the needs of veterans and their families in Australia.

40. There are some important factors that require consideration in undertaking this reform work which include:

- *Learning the lessons from our past and setting the system up in the best possible way to ensure it achieves what Australia expects.*

Reform work is expensive, and it is sobering to think of the amount of money already spent reviewing and reporting on the veteran system. As the Royal Commission has already pointed out, the parade of reviews, reports and findings to date has resulted in limited change and problems continuing. The veteran and family community are being fatigued by the rhetoric and limited action. Not only does this mean that reform work must result in meaningful change, but that it solves the problems that have already been identified. Tinkering with the symptoms of the problem do not offer resolution. There is a risk that reform work if not considered strategically will have limited effect on the pressures within the entire veteran system. Mitigating this risk is fundamentally important, a strategic view needs to be taken to the veteran and family policy agenda. Reform works undertaken now cannot be politicised and must put the needs and interests of the veteran community first. A result of this reform work ought to be a long-term commitment to continuously evolving this system to ensure veterans and their families are supported during and beyond their service.

**VETERANS' LEGISLATION REFORM  
AWWNSW SUBMISSION – MAY 2023**

- *Providing more detail to the community regarding how the transitional arrangements will work to ensure veterans and their families are supported and where possible are able to exercise choice.*

Currently, there is limited information available regarding how the transition period will work or what is planned throughout this period. As it stands, there is a real risk that inequities between claims considered under legislation which is earmarked for repeal and the MRCA. There is unclear information regarding the impacts of the changes to programs and services delivered through older legislative frameworks and how these will be augmented to ensure that the needs of ageing veterans and their widows are properly supported under the new and revised MRCA. Of most concern to AWWNSW is that ageing war widows may be unknowingly disadvantaged by the timing of their claim, unless the arrangements for claims processed in the changeover period are made clear.

- *Removing or reducing the privacy barriers that prevent family engagement and limit proactive community support.*

Privacy is a significant barrier to family engagement, communication and service provision. The barrier is well known but limited work has been done to remove it or reduce its impact. Debates on family inclusion and engagement end with the barrier being identified and using the barrier to reason why veteran families cannot be included in the system. Privacy is an issue but not one that is insurmountable. In AWWNSW's view privacy is used to reason why things cannot happen as opposed to looking at how to work within the limits it provides and find other ways to overcome it. The simplest way to overcome privacy is through consent. Interestingly, many of the veteran families AWWNSW talks to think that has already been provided. They are expecting to be contacted by Defence, DVA and the community sector. They are waiting for information, engagement and support and they are left wanting.

Privacy concerns ought not limit the recognition and inclusion of veteran families within this legislation, reform work or the support system. Instead, the barrier needs to be addressed and system improvements made to ensure that proactive contact can be made with all of those families that seek it and are waiting for it.



**VETERANS' LEGISLATION REFORM  
AWWNSW SUBMISSION – MAY 2023**

SECTION FIVE – RECOMMENDATIONS AND CONCLUSION

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41. AWWNSW is firmly of the view that looking after and supporting veterans' families and caregivers makes good policy sense for Government and its agencies. Veteran families are at the centre of the solution that the veteran system is looking for and are certainly not a by-line in the pursuit of inclusivity. AWWNSW therefore believes that the duty of care owed to veterans must also be extended to their families and caregivers. As Prime Minister Curtin noted in 1944 when visiting Australian soldiers during the war he stated:

*"Our first task the day this struggle ends will be to do justice to the valour and devotion of you lads. This will not be a matter of politics. I feel able to give the pledge on behalf of any post-war Australian Government whatever its party, that our responsibilities to you and your dependants will not be forgotten."* – John Curtin, 1944.

42. In 2021, the interim National Commissioner for Defence and Veteran Suicide Prevention, Dr Bernadette Boss articulated this commitment but in more modern terms through referenced Social Contract Theory, specifically *"The social contract between the Australian Government and veterans obliges the Australian Government to ensure veterans' lifetime health and wellbeing as repayment for the abrogation of their absolute right to life during their service defending the country and the lives of its people."* (Attorney Generals Department, 2021). AWWNSW submits that this contract also extends to the families of veterans who are impacted by the unique nature of military service and are themselves fundamental inputs to ADF capability.

43. AWWNSW recommends that the government have regard to the following opportunities when reforming the veteran's legislative framework:

1. The Ministerial Advisory Council ought to include at least one veteran family representative and the Council be modelled off the ACT Government's Ministerial Advisory Council for Veterans and their Families.





**VETERANS' LEGISLATION REFORM  
AWWNSW SUBMISSION – MAY 2023**

2. Improvements to the transparency, accountability and responsiveness of the Military Rehabilitation and Compensation Commission (MRCC) be considered and implemented alongside the merger of the Commissions. Specifically:
  - a. Veteran families are to be included in their remit.
  - b. Avenues for the community to engage with the Commission be enhanced and include provision for community submission and policy development.
  - c. Enhance reporting, accountability and recruitment practices ensuring that appointments are merit based and insulate the Commission from political influence.
  
3. Enhancements to the Veterans' Review Board ought to be considered in light of Royal Commission findings. Interim improvements ought to include enhancing the ability of the VRB to consider appeals holistically. The improvements also ought to ensure that processes are in place and operating effectively that result in VRB decisions being implemented and that the impact of those decisions flow through to claims and appeals under consideration by the MRCC and the VRB.
  
4. Including the capacity for the MRCC to presume liability for certain death claims under the expanded presumptive liability provisions.
  
5. The following amendments be made to the MRCA as part of the reform pathway:
  - a. Recognising veteran families and their role in the new legislative framework, in the Act's preamble and second reading speeches.
  - b. Ensuring the children of veterans have access to mental health treatment by removing legislative barriers to that treatment and include a framework to provide a treatment card to these children.
  - c. Including veteran family engagement and a role for DVA in the provisions that govern Transition Support.
  - d. Removing legislative barriers that cause inequity within the provision of entitlements that create a rigid system that reduces availability of services and support. Moving toward greater flexibility and a needs-based approach to the provision of entitlements.



**VETERANS' LEGISLATION REFORM  
AWWNSW SUBMISSION – MAY 2023**

- e. Update the language within the attendant care support provisions to better reflect community need and understanding.
  
- 6. The reform work be considered strategically and holistically ensuring that the reform work and the new MRCA is insulated from politics and the election cycle, instead putting the veterans and their families at its centre.
  
- 7. Greater detail on how transitional arrangements will work ought to be provided to the community and provision and flexibility built into ensure that veterans and their families are supported and empowered by the changes affecting their lives.
  
- 8. Removing or reducing the privacy barriers that prevent family engagement and limits proactive community support.
  
  
- 44. The veteran system, which includes both government and non-government actors a must be simplified. There must not be any more wrong doors for veterans and their families. The system needs to be built around the people who are at the centre of it all, the veterans and their families and caregivers. There is no more room for judgement in this system, no more room for territory marking or competition; and no more room for privacy being used as an excuse to not meaningfully engage families, caregivers or the community sector.
  
- 45. AWWNSW looks forward to working with the Australian Government and its agencies in delivering meaningful change within the veteran system and improving experiences and outcomes for veterans and their families.

***Questions on this submission can be directed to Ms Renee Wilson, Chief Executive Officer,  
Australian War Widows NSW*** [REDACTED]

