

# Written evidence submitted by The Royal British Legion

## Defence Sub-Committee: Inquiry into Service Accommodation

September 2023

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### 1. About Us

- 1.1 The Royal British Legion (RBL) is at the heart of a national network that supports our Armed Forces community through thick and thin – ensuring that their unique contribution is never forgotten. We were created as a unifying force for the military charity sector at the end of the First World War and remain one of the UK’s largest membership organisations. RBL is the largest welfare provider in the Armed Forces charity sector, helping veterans young and old transition into civilian life. We help with employment, financial issues, respite, and recovery, through to lifelong care and independent living. For further information, please visit [www.britishlegion.org.uk](http://www.britishlegion.org.uk)
- 1.2 RBL supports members of the Armed Forces community to navigate and access the civilian housing system, often alongside holistic support to overcome other difficulties. For example:
- a. RBL’s Outreach Service supports beneficiaries and their families to find practical and long-lasting ways to achieve their potential, lead fulfilling lives and take responsibility for their future. The service has received 1027 new referrals for beneficiaries from August 2022 – July 2023, a 10.7% increase compared to the same period 2021-22, helping those who need support with multiple issues such as homelessness, drug and alcohol issues, domestic violence, mental health, and prison leavers.
  - b. RBL’s Benefits Debt and Money Advice (BDMA) Service provides free debt and money advice on bankruptcy and debt relief, benefit checks and income maximisation, as well as benefit claims and challenging decisions up to and including the Upper Tribunal. In 2021/22, the BDMA Service provided support in 1,771 cases.
- 1.3 RBL has also produced a best practice guide, *Supporting the Armed Forces Community with Housing in England*<sup>1</sup>, providing local authorities with practical advice and best practice examples on implementing legislation and guidance relating to homelessness and housing allocations for members of the Armed Forces community in England.

### 2. Summary

- 2.1 RBL believes all serving personnel and their families have the right to good quality accommodation, whether living in Service accommodation or being supported to access the civilian housing system during and after transition to civilian life. RBL recognises the substantial investment by the Ministry of Defence (MOD) to improve Service Family Accommodation (SFA) over the past year. We welcome and hope that this investment, and the Defence Accommodation Strategy published in 2022, will result in all serving personnel and their families living in the good quality accommodation they have a right to and deserve.

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<sup>1</sup> [Housing Advice | Housing Support | Royal British Legion](#)

2.2 We have restricted our answers to this call for evidence to the questions where we can offer expertise and insight, and where we believe that the Armed Forces community may require additional support or be at a disadvantage. We would like to draw the sub-committee's attention to:

- a. The ongoing importance of monitoring work to improve maintenance and conditions of Service accommodation, to ensure improvements are delivered and sustained. The views and ideas of serving personnel and their families are vital to include in this.
- b. The impact of cost of living challenges on Service personnel and their families, with significant need among the serving community, and those living in Armed Forces accommodation, demonstrated by demand for RBL's Cost of Living Grants programme.
- c. The need to continue to modernise recognition and support for a range of family constructs, to ensure living and visiting arrangements are appropriate for children.
- d. The importance of early and regular support for transition, including information, support and involvement of family members.
- e. High demand for long-term support for members of the Armed Forces community with housing needs, alongside a wide range of other issues, recognising that members of the Armed Forces community can experience housing-related needs many months or years after transition into civilian life.
- f. The need to review and ensure access to safe, appropriate accommodation for those leaving relationships and homes where they have experienced domestic violence or abuse as a member of the Armed Forces community.

### 3. Inquiry Questions

#### 3.1 What measures have been put in place to resolve the housing maintenance issues, hold service providers to account and ease the cost of living for service families?

3.1.1 The condition of SFA has been an issue for many, with families repeatedly reporting dissatisfaction with maintenance and poor conditions. MOD data indicates that 57% of families live in SFA during the working week<sup>2</sup>, and as of March 2022, the MOD managed some 47,900 properties.<sup>3</sup>

3.1.2 The FAMCAS 2023 survey found that 'satisfaction with aspects of maintenance and repair of SFA and Substitute Service Family Accommodation (SSFA) has fallen over the past two years to the lowest levels ever reported'. Less than half of those living in SFA/SSFA are satisfied with the overall standard. Of those families living in SFA and SSFA, nearly three-quarters (74%) are now dissatisfied with the response to requests for maintenance/repair work<sup>4</sup>.

3.1.3 RBL is aware that the MOD requested rectification plans from Defence Infrastructure Organisation (DIO) suppliers in Sept 2022, intended to address maintenance issues. New suppliers committed to introducing significant changes to modernise and improve services to Service families. The MOD are also investing £176 million into improvements to SFA, including new service contracts, new homes, and actions to improve quality, in financial year 2022/23.

3.1.4 The latest edition of the Families First<sup>5</sup> newsletter reports that 'as of 24 May, the number

<sup>2</sup> Ministry of Defence (2023), *UK Tri-Service Families continuous Attitude Survey Results 2023*, p. 26, available at [UK Tri-Service Families Continuous Attitude Survey Results 2023 \(publishing.service.gov.uk\)](https://publishing.service.gov.uk)

<sup>3</sup> Ministry of Defence (2022), *Service Family Accommodation Statistics*, available at [Service Family Accommodation Statistics: 2010 to 2022 - GOV.UK \(www.gov.uk\)](https://www.gov.uk)

<sup>4</sup> Ministry of Defence (2023), *UK Tri-Service Families continuous Attitude Survey Results 2023*, p. 26, available at [UK Tri-Service Families Continuous Attitude Survey Results 2023 \(publishing.service.gov.uk\)](https://publishing.service.gov.uk)

<sup>5</sup> Available at [Families First newsletter issue 08 \(publishing.service.gov.uk\)](https://publishing.service.gov.uk)

of outstanding repairs and maintenance tasks has fallen to 5,097', down 75.8% from the December peak of 21,100 and ... the number of active complaints has reduced to 1,520.'

- 3.1.5 An MOD survey aiming to understand “the fullest possible picture of the condition of Service family homes... to achieve maximum future investment in our Service Family Accommodation and ensure that spending can be targeted where most needed” closed on 27 Mar 2023.
- 3.1.6 **RBL recognises the commitment to understanding the extent of the problems in SFA and encourages the MOD to remedy any significant findings to improve the experience of families. RBL welcomes the MOD seeking feedback, and encourages the MOD to publish survey findings and engage directly with serving personnel and families, on an ongoing basis, to understand the community's experiences as improvement work is done.**
- 3.1.7 While RBL recognises improvement work is underway and positive steps are being taken, experiences of families and those supporting them demonstrates there are still significant issues in standards of SFA and that this is having a detrimental impact on Service families. It is vital that the MOD continue to monitor quality, timeliness, and sustainability of improvement work.
- 3.1.8 Many personnel and their families are still experiencing delays with repairs and maintenance as the backlog of work is being addressed. RBL has supported families with issues including damp and mould, delays in moving into new properties, and communication breakdown between families and Pinnacle<sup>6</sup> when logging maintenance requests and attending appointments. As a temporary solution RBL has, for example, purchased a dehumidifier for a family living in SFA that was too small, with damp and mould, facing delays in moving to a larger property.
- 3.1.9 The recent increases in the cost of living are a challenge for many UK households, and serving personnel and their families may experience unique or additional pressures, which may include increased utility bills for poorly insulated or maintained accommodation.
- 3.1.10 In Oct 2022, RBL launched Cost of Living Grants to assist people who need help quickly with everyday essentials such as kitchen appliances, clothes, and energy costs. Since then, RBL has provided grants to both serving and ex-serving personnel, most commonly assisting with the costs of utility bills.
- 3.1.11 **Over 7,500 applications have been made through the Direct Grants Portal (to access cost of living grants) up to end July 2023. Of these, around a fifth are from serving personnel. Almost 1 in 10 report living in Armed Forces accommodation.**

## 3.2 What are the benefits and drawbacks of the Future Accommodation Model (FAM)? How successful was the Future Accommodation Model pilot and what should the MOD take forward to include in the new accommodation offer?

- 3.2.1 RBL welcomes the MOD's recognition of different family structures and varying ways of accessing services and support. The Families Strategy acknowledges the need for a 'flexible accommodation policy that reflects modern family constructs'<sup>7</sup> and one of the main aims of the strategy is to make the Armed Forces more supportive of these.

<sup>6</sup> Pinnacle Group Ltd manages the National Accommodation Management Services contract in the UK on behalf of the DIO - [CBP-9716.pdf \(parliament.uk\)](#)

<sup>7</sup> Ministry of Defence (2022), *UK Armed Forces Families Strategy 2022-32*, p. 14, available at [UK Armed Forces Families Strategy 2022 to 2032.pdf](#)

- 3.2.2 However, RBL has supported personnel living in Single Living Accommodation (SLA) whose children have been unable to visit them due to the lack of appropriate accommodation. We have supported cases where families have reported a lack of suitable sleeping or cooking facilities. In other cases, serving personnel have got into debt because they have been renting other accommodation or using hotels to host weekend visits for their children.
- 3.2.3 Additionally, the provision of SLA was described as ‘inconsistent’<sup>8</sup> in the National Audit Office 2021 report on Improving Single Living Accommodation. This can have a significant impact on the Service person, for example, a single Service person who does not hold PStat Cat<sup>9</sup> 1 or 2 is not eligible for SFA and more likely to live in SLA.
- 3.2.4 **RBL is aware that the policy for Personal Status Category – JSP 752 is currently under review. In reviewing the policy the MOD must focus on interactions with the new accommodation model and JSP 464, and the impact this may have on living and visiting arrangements for Service families and children, with a focus on the variety of modern family constructs that exist within the Armed Forces Community today.**
- 3.2.5 The private housing sector in the UK faces challenges, such as housing stock, availability, and affordability. In this context RBL believes consideration should be given to the feasibility and support requirements of the new accommodation model.

### 3.3 Is enough being done to help personnel leaving service transition to civilian housing?

- 3.3.1 Significant changes to support around transition have been made in recent years, but research continues to highlight housing as a ‘key concern for many veterans’, particularly for those experiencing additional challenges, such as mental ill-health, leaving the criminal justice system, unemployment or relationship breakdown. Accessing suitable accommodation ‘post transition into civilian life from the military is one of the key markers for future success and wellbeing.’<sup>10</sup> However, as Service Accommodation is separate from the civilian system, serving personnel leaving Service can find the civilian housing system difficult to navigate, partly due to the sheer number of organisations involved.<sup>11</sup>
- 3.3.2 Research undertaken by the Tri-Service Family Federations<sup>12</sup> reinforces the view that some issues around housing arise as a result of challenges throughout transition. Preparing to leave the Armed Forces, whilst upholding the demands of Service within their final months, can be challenging.<sup>13</sup> This is particularly true for those who are deployed away from their home base, or are having to leave Service unexpectedly, for example owing to medical discharge.<sup>14</sup>

<sup>8</sup>National Audit Office (2021), *Improving Single Living Accommodation*, p. 56, available at [Improving Single Living Accommodation \(nao.org.uk\)](#)

<sup>9</sup> PStatCat 1 = married or in a civil partnerships; PStatCat 2 = primary parental responsibility. The definitions of Personal Status Category (PStat Cat) into which personnel are placed for the purpose of determining entitlements to benefits are available at [Personal Status Categories \(publishing.service.gov.uk\)](#)

<sup>10</sup>Fleuty et. al., (2021), ‘Armed Forces and Veteran Housing Policies: The United Kingdom 2021 Vision’, *Journal of Veteran Studies*, Vol. 7 Issue 1, available at [Armed Forces and Veteran Housing Policies: The United Kingdom 2021 Vision - Journal of Veterans Studies \(journal-veterans-studies.org\)](#)

<sup>11</sup> Rolfe, S (2020) University of Stirling, ‘Working Together’.

<sup>12</sup> The Tri-Service Family Federation include the Army Families Federation (AFF); Naval Families Federation (NFF); and the Royal Air Force Families Federation (RAFFF)

<sup>13</sup> AFF et. al., (2018), *Lifting the Lid on Transition: The families experience and the support they need*, p. 24, available at [lifting-lid-transition-families-experience-support-they-need.pdf \(pcdn.co\)](#)

<sup>14</sup> Forces in Mind Trust (2020), *Policy Statement on Housing*, available at [Policy-Statement-on-Housing-final-version-v2.pdf \(pcdn.co\)](#)

- 3.3.3 Whilst families often transition from Service life alongside their spouse or partner, research indicates that support for families is not accessible or tailored to their needs and challenges.<sup>15</sup> For example, the civilian housing brief is available online to those with a Defence Gateway login, meaning that only serving personnel are able to access this brief and communicate the necessary information to their spouses and partners.<sup>16</sup> This hinders ability to plan together and maximise chances of a successful transition as a family.
- 3.3.4 **RBL believes it is vital that all families of serving personnel can access effective and tailored support during transition, including encouraging involvement in early preparation for leaving service. It is also imperative that resources are accessible to Service personnel and their families early and often as they prepare for the transition process.**
- 3.3.5 The 2014 Veterans' Transition Review estimated that 3% to 6% of Service leavers have experienced some level of homelessness after leaving the Armed Forces.<sup>17</sup> More recent estimates and studies suggest around 6% of rough sleepers are veterans.<sup>18</sup>
- 3.3.6 The 2021 Census included a question to identify whether someone has served in the UK Armed Forces. Data released in June shows that in England and Wales, just under 2% (255) residents in hostels or temporary shelters for the homeless on Census day, were veterans. Nearly 12% of temporary shelters for the homeless had at least one veteran staying.
- 3.3.7 Staff delivering RBL services report that homeless veterans who approach us for help are often single males that have found themselves to be homeless due to financial difficulties, relationship breakdown, mental health problems and/or substance misuse issues, with issues presenting months or years post-Service.
- 3.3.8 However, it is also important to highlight that reporting from our services shows that housing support is a key area of enquiries and welfare needs from many different members of the Armed Forces community, from single males, early or young Service leavers, to families, and those struggling with relationship breakdown.
- 3.3.9 RBL welfare teams are supporting beneficiaries who are struggling to sustain tenancies or households, or are experiencing or at risk of homelessness, in several ways, including:
- a. **Grants** – when leaving Service and moving into a property or in subsequent house moves, RBL supports members of the Armed Forces community who cannot afford the costs associated with moving in the civilian housing sector, such as grants for brown and white goods, rent and bond in advance payments, and energy grants.
  - b. **Financial support** – including benefits, debt, and money advice. RBL supports members of the Armed Forces community who need financial support if they have fallen into priority debts with utility bills, rent arrears or council tax arrears. Often beneficiaries will be unaware of the benefits they may be entitled to or how to apply for these and RBL will provide them with this information and guidance.
  - c. **Outreach support** – RBL provides support to members of the Armed Forces community that have found themselves at crisis point. This includes threat of eviction or having left a tenancy and are homeless or in unsustainable housing situations. We provide support to navigate the housing pathways, including signposting to local

<sup>15</sup> AFF et. al., (2018), *Lifting the Lid on Transition: The families experience and the support they need*, p. 24, available at [lifting-lid-transition-families-experience-support-they-need.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/944598/Initial_findings_from_the_rough_sleeping_questionnaire_access.pdf) (pcdn.co)

<sup>16</sup> Ibid.

<sup>17</sup> M. Ashcroft (2014), *The Veterans' Transition Review*, p. 90, available at [vtrreport.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/944598/vtrreport.pdf) (veteranstransition.co.uk)

<sup>18</sup> Ministry of Housing Communities and Local Government Understanding the Multiple Vulnerabilities, Support Needs and Experiences of People who Sleep Rough in England [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/944598/Initial\\_findings\\_from\\_the\\_rough\\_sleeping\\_questionnaire\\_access.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/944598/Initial_findings_from_the_rough_sleeping_questionnaire_access.pdf) p.59 (accessed 25 April 2023)

authorities and specialist organisations, such as Shelter.

**3.3.10 Between August 22 – July 23 RBL received in excess of 1500 enquiries relating to housing need with at least 1000 of these relating to applicants under 65 years of age (over 150 were age 30 or younger, and over 650 aged 45 or under). In the same period RBL provided over 600 grants relating to rent or mortgage payments, housing charges or deposits, and rent arrears or damages, with a total value of almost £570k. Nearly 94% of these grants were given to under 65-year-olds.**

**3.3.11** RBL advocates for a person-centred and holistic approach to the needs of the Armed Forces community, particularly where needs are complex and support outside of RBL’s remit is in the best interest of the beneficiary. For those with additional vulnerabilities RBL’s Outreach team will support them to engage with relevant health services across the devolved nations, such as Op Courage in England, Veterans NHS Wales and housing support through Op Fortitude.

### **3.4 Could the Service Accommodation offer be more supportive to those experiencing breakdown or domestic abuse?**

- 3.4.1 The shortage of affordable housing in the civilian market makes finding appropriate accommodation challenging. For those experiencing relationship breakdown this can be particularly difficult, particularly where there are children or situations of domestic violence.
- 3.4.2 For example, a common challenge for families following relationship breakdown, is seeking alternative accommodation within the 93 days ‘Notice to Vacate’ period when living in SFA. RBL has supported several families when they have received their notice to vacate and have been unable to find appropriate alternative accommodation, leading to them overstaying in their Service accommodation. This has resulted in some families being charged “mesne profits”<sup>19</sup> rather than rent following the 93-day period as they remain in the property after their tenancy has ended.
- 3.4.3 Due to being charged mesne profits, Service families who remain in SFA following a relationship breakdown are unable to access Housing Benefit or the housing element of Universal Credit, often resulting in them accruing arrears. This can have a profound impact on financial wellbeing and create additional challenges when accessing new accommodation, for example, leaving them unable to save for a rental deposit, or apply for social housing.
- 3.4.4 In addition to the support provided through the BDMA services, (see 1.2.b) and cases involving mesne profits, RBL’s Outreach Team continue to support spouses/partners and families to relocate when leaving abusive relationships. This provision is often multi-disciplinary due to the complexity, involving local authority housing teams, mental health professionals as well as other charities and support agencies.
- 3.4.5 Whilst some local authorities demonstrate best practice in fulfilling their duty with the Armed Forces Covenant in their housing allocation policies, primarily through disregarding the local connection for separated spouses or partners, many do not. The RBL *Best Practice Housing Guides* details some examples of this<sup>20</sup>. Where local authorities are unable to provide appropriate temporary accommodation, RBL can provide grants for hotels and B&Bs, as well as rent and bond for longer term solutions, particularly where cases involve children and age

<sup>19</sup> ‘Mesne Profits’ are payments claimed by landlords from former tenants who remain in a property following the termination of a tenancy. The amount of mesne profits payable is usually equivalent to the rent that the former tenant was payment. These payments do not count as ‘rent’ and as such a landlord is not creating a new tenancy by accepting such payments. (Shelter, *Payments after a tenancy ends*, available at [Shelter Legal England - Payments after tenancy ends - Shelter England](#))

<sup>20</sup> [Housing Advice | Housing Support | Royal British Legion](#)

restrictions apply to other accommodation solutions, such as refuges.

- 3.4.6 These insights into cases of relationship breakdown show that there is a need for the MOD to provide further support to families who experience domestic violence, particularly when finding alternative accommodation. **Current policies can result in some families, through no fault of their own, being unable to leave SFA and by virtue of them remaining, find themselves in debt and/or at continued risk of exposure to unsafe situations.**
- 3.4.7 **It is essential that the MOD review their current provision of appropriate safe accommodation with a view to ensuring there is adequate support to all members of the Armed Forces community. RBL encourages the MOD to consider this provision as part of their work on the No Defence for Abuse Strategy.**

***1 September 2023***