

Written evidence submitted by Lt Col (Ret'd) Diane M Allen OBE

Overview:

Thank you to the HCDSC for its work – it is the only group currently holding MoD to account; its reports¹ on MoD are informed, offering solid recommendations for reform. The national shame is that the MoD remains able to (mostly) ignore the recommendations and has done this *for decades*². The assumption is that MoD HQ must believe that stalling reform is beneficial, but this is achieving only short-term results (benefiting an individual Head of the Armed Forces and their beliefs, but not the Armed Forces itself). The erosion of military values & standards (through military leaders unwilling or unable to uphold the values) has much longer-term effects: loss of confidence in service; a decline in recruiting numbers and diversity; poor retention (of the right people); and crucially - loss in operational confidence and success. The HCDSC reports are critical, to capture the evidence, but there is an overdue need to create an Independent Defence Authority³ (IDA), with the power to mandate implementation of the recommendations - to act as the voice of service personnel (and veterans⁴); and to hold military leadership to account where there are gross failings of duty to their people. **MoD are never going to hold themselves to account.**

In common with the 2020 findings, women enjoy service – and if they are lucky enough to avoid a ‘toxic pocket’⁵, they grind out successful careers, usually by putting up with everyday sexism e.g., inappropriate comments/behaviours, male-designed training, poorly fitting uniforms, and difficult childcare options.

The announcement this month of the outcomes of research⁶ into the lived experience of women in defence is welcomed; acknowledgement of Military Sexual Trauma as a condition, small funding streams to support those who have suffered it and links to NHS support as examples. I hope to see this develop into an inquiry, similar to Lord Etherton’s review (into the wrongs suffered by serving LGBT+ personnel), which will quantify the experiences of serving women who have suffered sexual assault (and then been wronged a second time, by seeing their experience denied by MoD). While the research recommendations will start to address the downstream fall out from some military service, it will have no impact on the upstream – **the abdication by senior service leadership of its duty of care to provide a safe working environment.** The view expressed by a former Head of the Armed Forces⁷ was that ‘laddish culture’ was acceptable to him (and therefore during his tenure, was the culture accepted by all). As part of this review, we must ask MoD to define what ‘laddish culture’ means and how it relates to the MoD’s published values and standards. It is this gap between written policy and senior leadership beliefs that is causing the ongoing inappropriate behaviours. The ‘say-do’ gap has been identified before in the many reports

¹ Women in Defence (Atherton) report, 2021, but also similar leadership failings with service accommodation where SP are not allowed to comment, and ongoing Procurement debacles [The Ajax Lessons Learned Review - GOV.UK \(www.gov.uk\)](http://www.gov.uk)

² The earliest report finding inappropriate behaviours I have found is 1986? (The Report of the Security Commission, 1986). More recently, there has been: Deepcut (2006) [The Deepcut Review - GOV.UK \(www.gov.uk\)](http://www.gov.uk); The Lyons review (2017) [Service Justice System review - GOV.UK \(www.gov.uk\)](http://www.gov.uk); The Wigston Review (2019) [Wigston Review into inappropriate behaviours - GOV.UK \(www.gov.uk\)](http://www.gov.uk); The Atherton report (2021) [Report: Protecting Those Who Protect Us: Women in the Armed Forces from Recruitment to Civilian Life - Committees - UK Parliament](http://www.parliament.uk).

³ As previously recommended in (at least), the 2018 Wigston and 2021 Atherton reports.

⁴ The role of the OVA versus the MoD needs clarification - on who holds what responsibilities for SP and Veterans

⁵ I define a toxic pocket as a military location where women are isolated/targeted, through a combination of low numbers of women on site, historically poor attitudes to women (or other military minorities) – and weak or bigoted leadership.

⁶ [Women-in-Defence-Insight-and-Data-2023-Report_Updated.pdf \(svdcdn.com\)](http://svdcdn.com)

⁷ [General Sir Nick Carter under fire for ‘laddish culture’ comments \(thetimes.co.uk\)](http://thetimes.co.uk).

mentioned above, but never resolved. It won't be unless we acknowledge the difficult truth that senior leaders still reward their junior leaders brushing issues under the carpet - this is the culture gap which is blocking reform. It is why serious sexual assaults, rape, everyday sexism of women (and many men too), can continue behind the closed military doors of UK's armed forces - because it is silently rewarded by MoD senior leaders. Too many military leaders at all levels, do not actually believe in the written policy and stated values - this is where reform needs to start. What behaviours do we need for a strong, capable British Armed Forces? Until we address that, the current MoD systems (which are designed to block victims from being heard) and the quiet promotional rewards offered to military leaders at all levels, for ignoring complaints will continue. Since the Atherton inquiry it has become more aggressive for those raising complaints - those who dare to challenge (the active bystander) or who become direct victims of this 'laddish culture' see an overt stalling of their careers and are pushed out⁸. The message is still clear - military leaders are rewarded for brushing poor behaviours under the carpet. Until that fundamental driver changes, then the MoD will not be a safe working environment, for women, but also most men.

People should be the most important asset for MoD – they are not. The main benefactors of retaining the current MoD systems are a very small cohort of privileged white males at the top of defence – and the predators. Brushing serious issues under the carpet is damaging the moral component of our fighting power (one of the core critical areas for military operational success). What is needed is an honest conversation with senior military leadership - if they do believe that a 'laddish culture' which includes ongoing rapes and sexual assaults of serving women is acceptable, then say so - but do not then advertise MoD as a safe working space. Or if these behaviours are against military values, then it is time to see the perpetrators and leaders who support their vile behaviours punished, not promoted.

Comment on this review format– the advertising of this inquiry has been low key and short. And while MoD did give permission for serving persons to send written input from service persons (SP), we have not found evidence of any advertising of this on service channels. SPS are consistently describing real fear in sharing evidence and have been heavily warned of consequences if they do participate. Due to the lack of progress seen since the Wigston and then Atherton reports, there is also a degree of scepticism that the risks of speaking up do not match the likelihood of getting any change. It is hard to explain to a civilian audience the level of vicious response that any SP can experience. If they are caught speaking up (even with permission), the threats of career loss are real. For veterans, the requirement to upload word documents and a rigid format of questions has also meant input is more likely from larger organisations than individuals.

About me

My name is Lieutenant-Colonel Diane Allen OBE. I left the armed forces, because it was impossible to speak up when serving - and I was witness to significant failures in military values & standards (I wrote about my experiences as a woman serving in my book, *Forewarned*⁹, published in 2020). The treatment of women is really the 'canary in the coalmine' – the problems facing the MoD are not just about women – but women are a good 'indicator' group for wider malaise. And each year defence leadership is allowed to ignore reform will cost more – through the loss of highly trained women and men, disillusioned with service life. Get it right for women, it will improve for all SP.

My reason for submitting is due to the lack of progress since the last inquiry – the ability for MoD to ignore most of the recommendations is a source of growing anger by many serving

⁸ Case Studies will be shared privately, but the risk has become too high (I can provide details of the risks being raised) to publish openly.

⁹ [Forewarned: A Woman at War ... with the Military System: Amazon.co.uk: Allen, Diane: 9781912964376: Books](https://www.amazon.co.uk/Allen-Diane-9781912964376-Books)

women and veterans – that MoD has been able to ignore the recommendation for a Defence Authority and continue to ‘monitor itself’.

Update on Women in Defence Progress

I can summarise my input by saying ‘read the Gunner Jaysley Beck inquiry.’¹⁰ This sad case of suicide due to relentless sexual harassment by her chain of command should be the wake-up call for change. Her experience – of reporting sexual bullying and approaches by her seniors, to a disinterested Command team (who gave the lead perpetrator a small slap on the wrist and allowed him to continue), effectively brushed her complaint under the carpet – she then had nowhere else to turn. This is the same failure of duty of care as I have heard from hundreds of other service victims: an incident occurs – if it’s minor, the victim tries to ignore it (to fit in); if serious, they report it and find an immediate closing of the system against them – they are treated as the wrong-doer, even though they are requesting the chain of command uphold written values & standards for service. The victim finds themselves isolated, without the basic rights they would expect as a UK citizen (because being in the military reduces basic rights). The victim is then gradually destroyed, shocked by the level of denial, lack of support and coercion by her command team (and an obstructive, unsafe complaints process). There is no professional HR, and very few willing to actively support a victim – for fear of loss of career/housing/the service life.

Gunner Beck was too young and inexperienced to defend herself (alive or dead) against the toxic pocket she was posted into – and she should not need to have done. A teenage soldier should be able to guarantee the support of her chain of command – she did not get that. The problems she faced are the same of the young women (and some men) who encountered other toxic pockets – most recently the vile behaviours of some of the Red Arrows pilots¹¹, and those submariners who thought it was appropriate to write a Crush Depth Rape List with the names on it of women serving onboard. The MoD response to Gunner Beck’s death was that it was ‘regrettable’. The lead perpetrator is believed to still be serving, his career unaffected. Gunner Beck’s commanding officer appears to have ignored her cries for help and may have been promoted and moved on (although all names were redacted in the report so this information needs confirming).

It is hard to see how there will be any significant improvement in creating a safe and operationally enabling environment, without leadership at all levels being held to account – ideally through the actions of the MoD – but as this duty of care appears to be lacking – through the creation of an independent watchdog.

¹⁰ The unnecessary suicide of Gunner Jaysley Beck, after relentless sexual harassment by her own chain of command. The death of Cpl Anne-Marie Ellement [Cpl Anne-Marie Ellement inquest: Bullying 'factor in suicide' - BBC News](#) was a disturbingly similar case - there will be many more that have not achieved the media attention.

¹¹ See Case Studies

Specific Questions

Q1. How much change has there been in past two years, when it comes to improving the experiences of female service personnel and or female veterans?

I sent an update on progress in 2022, which is on record at HCDSC – so will summarise changes since then - as the ongoing experience for serving women and veterans. While there have been policy improvements¹², these policies are not being enacted ‘on the ground’.

In the darker corners where women serve – it is worse than in 2020. Toxic men have been embittered by the focus on women and have started to make it more difficult for women to serve and in some cases, have sought revenge. The Zero tolerance policy is creating coercion by command teams, ‘encouraging’ women not to report toxic behaviours as ‘they will ruin a man’s career’. Serving persons who then ask to leave the forces early, are being told they will not be allowed to leave unless they end a complaint, effectively compelling them to change their reasons for leaving, or be forced to stay in¹³. Additionally, since the Atherton report, serving women are reporting a rise in levels of hostility from some men - this is being reflected across other organisations who have reported significant #MeToo moments. MoD leaders need to be aware of this backlash and recommendations made to manage this additional hostility¹⁴.

Q2. What specific changes are you aware of against the initial recommendations?

I have attached an annex¹⁵ of the changes I am aware of against the Atherton recommendations – the MoD has stated that 46 of the 53 recommendations have been accepted, 4 partially and 3 rejected but my anecdotal research suggests there has been little ‘on the ground’ progress, even with those it accepted. The MoD should be asked to show quantifiable evidence e.g., case studies of progress made. The key blocker is the culture of support for laddish behaviour. The Armed Forces does need resilient, strong characters who can handle adversity, but this should not mean a need to defend oneself daily from sexual predation or being unable to gain support from the chain of command for removal of a persistent predator. I have talked to many serving women and men who say that leaders still gain more by brushing complaints under the carpet – and that predators are still retained in the Forces and do not suffer the same losses of career as a victim does. There is still nowhere for MoD victims to turn when things go wrong.

In my annex, I have written where I am aware of beneficial policy changes, with some benefit for Regulars, less so for reserves and a patchy introduction of flexi working opportunities, on some sites, for some people. The MoD has not prioritised cultural changes, especially to the complaints and careers system – both of which would start to shift the current issues that revolve around the blocking of complaints by the chain of command. There has been no change in the 2020 finding of ‘When things go wrong, they go dramatically wrong’. The key enablers for change – a leadership that can be held to account for not upholding values and standards; a complaints system that is capable of hearing complaints fairly and swiftly – and

¹² The Zero Tolerance Policy, the announcement of a defence serious crimes unit and removal of the chain of command from sexual assault investigations; a women’s health policy; a new policy on uniforms and body armour for women as examples.

¹³ See Case Studies

¹⁴ https://www.theguardian.com/world/2023/oct/23/harassment-victims-in-film-and-tv-face-backlash-after-metoo-study-finds?CMP=share_btn_link

¹⁵ Note from the Committee: the annex has not been provided to the Committee.

an Independent Defence Authority monitoring MoD – these recommendations have been ignored.

Q3. Are there areas where you hope to see more change?

Yes, and these align with the ‘big 4 areas’ recommended in the 2020 Atherton report (that have not been enacted):

- a. Create an **Independent Defence Authority**¹⁶, empowered to hold MoD to account is long overdue. MoD needs an impartial defence watchdog, to include:
 - i. A cumulative ‘**holding to account**’ of **progress made against all the many reforms/recommendations/inquiries** that have been ignored by MoD over decades of poor performance. All the issues raised could be fundamentally improved with the acceptance of this one key recommendation – for an independent defence watchdog. The current ability of MoD to state ‘progress has been made’, but without providing evidence would cease. For example, a Defence Authority could monitor reasons for leaving service early, thus identifying toxic pockets early¹⁷; and ask veterans (perhaps 3 years after leaving) how the transition was achieved and identify areas of good and bad practice.
 - ii. Publish **Leadership Case Studies**, to demonstrate to SP how careers are enhanced by ‘doing the right thing’.
 - iii. **Ensure service personnel centres keep a record of those involved in toxic incidents** – we believe the command element responsible for the Larkhill site who ignored Gunner Beck and failed to hold the Warrant office to account – have been promoted, rather than admonished. Currently, once a SP is posted, all the records related to their actions on that tour are deleted – this allows weak or toxic individuals to strike again. A professional HR team, aware of the long-term behaviours of individuals, could watch for patterns and inform senior leaders of unsuitable characters who should not gain promotion.
 - iv. Strategic **assessment of coherence between written policy e.g., implementation of the Zero Tolerance policy** versus action on the ground. Research to be initiated into how new policies are working and any adjustments needed.
 - v. Act as **provider of annual statistics**¹⁸ on sexual assaults, B&H, resolution of complaints etc. Introduce a ‘satisfaction survey’ on completion of complaints and on leaving service – recording reasons for leaving and satisfaction with the ability to raise issues safely.
 - vi. Act as the ‘voice’ for SP - where SP can safely raise issues, if they feel they are not being addressed at unit level.

- b. **The Complaints System – move this out of defence and into an independent service**, capable of meeting agreed resolution timelines and which treats the needs of the service and the individual as equal. The system would be overseen by the IDA.

¹⁶ The IDA should represent both serving and veteran needs, but retain independence from MoD and party political entities, linking directly to cross-party government organisations such as HCDSC.

¹⁷ For example training establishments: [Nine rapes at Harrogate military college reported to civilian police in 13 months | Military | The Guardian](#)

¹⁸ For example, collate the trends from SCOAF Service Ombudsman’s Surveys [Annual reports | Service Complaints Ombudsman for the Armed Forces \(scoaf.org.uk\)](#)

and Annual Continuous Attitude Surveys [Armed Forces continuous attitude survey: 2022 - GOV.UK \(www.gov.uk\)](#)

For Serving persons:

- i. Reduce the number of MoD lawyers involved in the complaints system - This approach is expensive and damaging to service morale. MoD does not need lawyers to handle complaints; it needs to professionalise HR services. These aggressive lawyers, employed to protect MoD reputation, use a bottomless purse to counter any issue raised – and do so with no accountability. I recommend that either MoD declares that ‘complaints are a legal process’ (and then provide legal support to complainants), or it can accept this is an HR process and save money by making this horde of lawyers redundant. I have seen evidence of legal threats, legal language deployed to baffle SPs. The current imbalance of power, with legal support to MoD only, is shameful and a severe cause of mental anguish. The aim currently of the legal approach is to destroy the complainant and force them to desist. Most complaints could be better handled by professional HR.
- ii. The ongoing farce, where annually the ombudsman writes that the system for complaints is ineffective inefficient and unfair, but it doesn’t change - must stop. I have written before at length on the damage being caused by this biased and mentally damaging approach to HR issues – it must be stopped if MoD is to improve its reputation and learn from mistakes as well as successes. In October 2023, SCOAF testified that ‘things are improving’ - we need to see evidence from complainants that this is so, not just MoD.

For veterans – the complaints system for how pensions are handled at Veterans UK is equally dismal and needs a review as to why so many are dissatisfied with the management and awarding of pensions. VeteransUK is overdue an inquiry¹⁹ into its practices. Many of the most vulnerable veterans, including women who have suffered MST are reporting dreadful support from Vets UK.

- c. **Introduce an independent ‘speak out service’** – this should be the ‘indicators & warnings’ for MoD leadership before things go wrong. The current BHD hotline does not have any impact – it does not resolve problems. The MoD has done some work since the Atherton inquiry - to research utilising an independent service but the HR team blocked further development. This is a shame.
- d. **The Service Justice System** – Emma Norton at the Centre for Military Justice writes far better than I can on the reasons the Lyons report recommendations should be enacted. I have been impressed by the efforts by the current Judge Advocate General, to improve the Courts Martial experience, but the recommendations in the Atherton 2021 report are still relevant - and the evidence was well captured in the HM Inspectorate report (2022) into the poor quality of military police in investigations into rapes and serious sexual assaults²⁰. Due to the current lack of independence, it is highly unlikely that MoD HQ or the failing D&I directorate will bring this critical report to your attention.
- e. For Veterans, there is an additional need: My input has focused on issues for those serving but there is a long overdue need to initiate **an inquiry to quantify the stain on UK defence for those women (and men) who have been traumatised and ignored (worse, labelled mentally unstable) for reporting sexual assaults**. Similar to the Lord Etherton LGBT+ inquiry that has done so much good, to capture the damage done, a similar one is needed for those who have suffered military sexual trauma. As Atherton

¹⁹ Veterans and Transition Surveys (2023) [James Sunderland: Parliament must ensure that Veterans UK is fit for purpose | Conservative Home](#)

²⁰ [Royal Military Police – Rape, serious sexual assault and domestic abuse investigations - His Majesty’s Inspectorate of Constabulary and Fire & Rescue Services \(justiceinspectrates.gov.uk\)](#)

2021 said, “ *the legacy of serving affects female veterans for years to come, sometimes negatively. We want all our veterans to feel proud of their Service*”. It is time for the UK to recognise what has happened behind military closed doors.

Q4. Do you see ‘easy wins’ for the Services/MoD?

These recommended ‘quick wins’ assume that MoD actually defines success in the same light as the HCDSC. Success for MoD seems to be to keep poor behaviours behind military closed doors – but this approach allows predators to thrive. *The first quick win would be for the HCDSC to confirm with MoD what success looks like and ask for a definition of what ‘acceptable laddish behaviour’ means.* The Atherton recommendations made it clear that senior leadership must be bold – this has not been the case.

‘Senior leadership in the Armed Forces and the MOD should be bold and unequivocal in solving these challenges, both for the operational effectiveness of our Armed Forces, and because our shared British values of fairness, equality and justice demand it.’

History teaches us there will always be predators who will take any opportunity to carry out vile acts – the lack of willingness by service leadership at all levels, to weed these characters out – is the fundamental issue. A commitment to do so and ensure there are consequences for failing to live up to MoD values and standards would be the main quick win.

Other Quick Wins

- a. **Stop the deeply damaging tidal wave of negative experiences reported in the media** and to investigative journalists (rape, B&H, abuse of women/men/ethnic minorities/LGBT+/refusal of MoD to allow SP to take part in an inquiry into service accommodation failings, **by setting up a credible speak up service**. If SP and veterans know they can be heard and have action taken if there are genuine failings, then there will be no need to turn to the media. MoD has lost control, by ensuring that the only way to speak up currently is via media outlets.
- b. **Update MoD media training** – stop the line ‘we take this seriously’ or ‘it is regrettable’ or ‘its just a historic issue’. Ask researchers to investigate if the public believes this! A more proactive response such as ‘we are aware of some ongoing incidents, despite our efforts to address issues – and will support and investigate this individual as we work to improve’ (and then actually support the victim, rather than attempt to discredit them).
- c. **Get serious about enacting recommendations**. Publish a plan, with annual stats on how MoD is progressing – make senior leaders responsible for delivering on this plan. Where women are less than 20% on a base, ensure extra measures are in place, to support cultural challenges they are likely to face. Be aware of the most toxic pockets, where women are making disproportionate complaints about toxic behaviour (I have separately sent examples of some of the ones I am aware of).
- d. **Get Bold**. Consider declaring some toxic pockets as unsafe for minority individuals²¹ – those on a first tour, minority groups e.g. women, ethnic, LGBT+. Accept that MoD has lost control of these sites. As examples, the RAF Red Arrows, the RN submariners, the Army’s Larkhill site, and Harrogate training establishment²². We must stop sending vulnerable individuals to be groomed and targeted, where leadership is too weak to control the ‘laddish culture’. Dr Andrew Murrison states that ‘we must make MoD a safe place for women to work²³’ - thus admitting it isn’t now.

²¹ [JANET STREET-PORTER: The Army must stop seducing women with promises - I Know All News](#)

²² In Case Studies and References

²³ [Women in Defence UK | New report | Women in Defence UK x Women in...](#)

- e. **Get rid of D&I directorate now (and then SCOAF)** – both are ineffective, but the D&I Directorate has added no value and could be disbanded now. Replace with an IDA.
- f. **Fully remove the chain of command from HR complaints** – there are too many SP being coerced to withdraw complaints.
- g. **Service Justice** – stop the details of sexual assault allegations ‘leaking out’ across the whole site – have a clear record of who has access to sensitive information and ensure if there are leaks, it is possible to track and hold to account any who have leaked details - it is a cause of deep anguish to a victim to find out that everyone on her/his unit has been able to find out all the details of their alleged abuse.

Q5. What has helped or hindered change?

The key hindrance is the lack of belief by senior leadership that providing a safe working environment, for women and men - is important. There appears to be confusion between expecting resilient, strong characters for defence roles - and being expected to put up with peers attacking fellow SPs. The decision by the previous Secretary of State for Defence, to block a free vote on the establishment of a Defence Authority during the reading of the Armed Forces Bill was a hindrance and emboldened MoD senior leaders that little would be done on his watch. Externally, the view of many who contributed to the original Atherton inquiry was that he put his previous service, as a military Guards officer, ahead of his responsibilities to parliament and the people.

What has Helped?

- a. **MoD engaging on line** - there has been a policy shift to allow selected MoD SP to counter the media stories - this is useful and allows genuine debate.
- b. **Policy clarification** such as Zero Tolerance is useful - but see the comments on poor enactment.
- c. **Recognition of a ‘behaviour problem’** but then seeing it as a ‘soldier problem’²⁴. As Babcock has reported in describing its success on recruiting women, ‘*where women are made to feel wanted, they will come*’. Recruiting and retention of skilled women who can add value to defence will only improve if they are made to feel welcome (the inclusion component) - and that culture change needs to be led by officers as well as soldiers.
- d. The HCDSC and Women in Defence **focus groups and inquiries** are helping women to realise they do have a voice and can share their experiences and ask for conditions that optimise their performance and service. For veterans, there is starting to be a sense that the traumas they experienced will be heard.
- e. **Having Sarah Atherton MP as a voice for serving and veteran women** – this has been lacking for decades – but it is currently only one voice – resilience is needed.
- f. The **OVA using the term MST** in its literature - and the recent research confirming the shortfalls in veterans services for women
- g. The **concept** of the setting up of a tri-service Defence Serious Crimes Unit and a Victims Support Unit is good - but using the same poor quality military police and forensic capability is not - there are better ways to do this, utilising specialist reserves/police partnerships.
- h. Receiving many messages from ‘**good’ SPs, who want to enforce values & standards, but feel they can’t** as ‘it is career suicide’. (Only changes in career structures and messages from senior leaders can change this dynamic).

What has Hindered?

²⁴ [‘Sandhurst for soldiers’ to be created to boost NCOs’ leadership skills, head of the Army says \(telegraph.co.uk\)](https://www.telegraph.co.uk/news/2015/03/24/Sandhurst-for-soldiers-to-be-created-to-boost-NCOs-leadership-skills-head-of-the-Army-says/)

- a. **Lack of understanding** on what achieves behavioural change (hint- it's not just writing policy)
- b. **Lack of consequences for failed leadership** (of each leadership rank)
- c. **Lack of consequences for poor behaviour** – still women (and men) who get posted or removed if they report a predator – and we are still seeing the perpetrators promoted and continuing successful careers as investigations drag on for years..
- d. **Inconsistency of outcomes**²⁵ – some get fined, some lose rank, many get to keep careers, there are not always additional aggravation factors considered if the assault involves recruits (enlisted or commissioned). The consequences currently still show that those who report an allegation of inappropriate behaviour often suffer far greater punishment than the accused.
- e. **Ongoing Involvement of the chain of command**, in HR complaints
- f. The **use of Non-Statutory inquiries** (NSIs) to subvert the normal investigation process eg the RAF Red Arrows complaint and RN Submariner Crush Depth Rape list, which are both running over 12 months now.
- g. The **lack of progress in reforming the Complaint system** - doctoring of evidence, GDPR breaches, losing of key evidence by HQ teams, poor assisting officers, heavy handed legal threats, medical and welfare officers sharing sensitive information and 'siding with chain of command' - and slow, inefficient systems, which fail to resolve conflict and wrongs. This lack of employment rights is a national shame.
- h. **Lack of Legal equity** in representation - including that MoD states a SP must finish the full SC system first which always times out the SP or veteran from moving to Employment Tribunal.
- i. The ongoing reports of **military medics and welfare personnel feeding sensitive information into the command teams** and labelling women 'unstable' when they report sexual assaults.

25th October 2023

²⁵ As an example: [Female British Army staff sergeant 'was demoted after pulling down her colleague's trousers, yanking her underwear and licking her face while she was on Skype' | Daily Mail Online](#)