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Royal Commission into Defence and Veteran Suicide  
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Dear Commissioners,

**Australian Psychological Society response to the proposed new entity to promote the wellbeing of Defence members and veterans**

The Australian Psychological Society (APS) is pleased to provide a submission to the Royal Commission into Defence and Veteran Suicide (the Commission) about a proposed new oversight body (entity) for the wellbeing of Defence members and veterans.

**About the APS**

The Australian Psychological Society (APS) is the leading professional association for psychologists in Australia. The APS is dedicated to advancing the scientific discipline and ethical practice of psychology and works to realise the full human potential of individuals, organisations and their communities through the application of psychological science and knowledge.

Our work is informed by the United Nations international human rights conventions<sup>1</sup> and the Sustainable Development Goals<sup>2</sup> which champion health and wellbeing as a human right for all and call for global collective action toward realising this.

By advocating on behalf of our members and the community, we strive to bring about meaningful reform in Australian health, wellbeing and social policies and systems. Our overarching objective is to ensure equitable access for all to quality, evidence-based services that promote health and wellbeing through proactive measures, prevention, early intervention and treatment.

As proponents of evidence-based practice, the APS draws on data, research and our member expertise to inform our responses.

**APS support for the proposed entity**

The APS is deeply concerned about the enduring mental health issues and suicides within the Defence and veteran community, and the wide-reaching impact on families, kin, friends and society at large, as detailed most recently in our [APS response to the Royal Commission into Defence and Veteran Suicide](#).

As noted in our submission, improving this situation will require a sustained national investment in quality, person-centred, holistic lifetime support for the Defence and veteran community, and systemic changes within the Australian Defence Force (ADF), Department of Veteran's Affairs (DVA) and other support agencies structures, policies and initiatives. Change will also require strong leadership that models and supports system-based actions and reforms.

Towards this end, the APS is supportive overall of the proposed recommendation by the Commission to establish a new oversight body for the reasons outlined in the consultation paper (pp. 3-5), including the need to:

- establish an independent and powerful body to monitor and hold to account the Government's response and implementation of the Commission's recommendations related to suicide prevention among Defence members and veterans,
- signify the Government's commitment to tangible actions and demonstrating sincere intent to address the gravity of the situation and the ongoing trauma associated with Defence and veteran suicide,
- ensure ongoing relevance of the Commission's recommendations through an entity that can adopt agile mechanisms and adapt solutions to address the evolving nature of the issue and insights over time, and
- comprehensively address the intricate and interconnected factors that affect the wellbeing of Defence members, veterans and their families and kin, ensuring a holistic approach that goes beyond individual agencies and government levels.

However, while we support the establishment of the proposed new entity, we provide the following feedback for your consideration.

### ***1. Enshrine human rights as a foundational design principle***

The APS broadly supports the principles of design for the entity as listed in the consultation paper (p. 5), including that the entity must:

- be strong and independent,
- be designed before the end of the Royal Commission, but have regard for the Commission's recommendations, the institutional context and the work of other relevant bodies,
- be informed by Defence members, veterans, family members and others with lived experience and expertise,
- not absolve the ADF, DVA and other relevant authorities of their responsibility and accountability for Defence members' and veterans' wellbeing, and
- operate in a trauma-informed way.

However, we contend that these principles lack a crucial human rights emphasis that could support the work of the entity to effectively address its proposed purpose "to contribute to improving the wellbeing of Defence members and veterans and preventing suicide and suicidality—from the time of their recruitment into the ADF and for the rest of their lives" (p. 6).

A human rights emphasis would position the design and operation of the proposed new entity as one grounded in dignity, equality, and respect for the inherent health rights of every Defence member, veteran, and their family and kin. A new entity, designed around human rights as a guiding principle, would empower it to:

- Operate in a manner that fundamentally respects, protects, and fulfils the fundamental right of Defence members, veterans, their family and kin to enjoy the highest attainable standard of health, including mental health, and
- Work to hold the Government accountable via its international human rights obligations, including the right to health, to implement, monitor and evaluate actions that enhance wellbeing, prevent mental ill-health and suicide, deliver high-quality mental health support and treatment for the Defence community, and address violations of these rights.

## **2. Ensure sufficient regulatory power to compel necessary action**

The APS strongly agrees with the design principles of independence and strength to ensure a new entity that the Government will take seriously and heed. Failure by the entity to drive robust action for tangible outcomes and hold the Government to account for improving the well-being of Defence members and veterans, risks perpetuating past harms and errors outlined in the Commission's interim report and over 50 previous inquiry reports and studies (e.g. <sup>3-5</sup>).

Thus, we note with concern, an apparent disconnect between the proposed design principles that call for a strong and independent new entity that can hold Government to account, and the following highlighted statement in the consultation paper:

*The new entity's main functions are proposed to focus on inquiring, reporting, advising and recommending. It's important to recognise that this does not amount to deciding. It is not proposed that the new entity participate in the actual making of decisions, on policy or administration or to direct other agencies to do things (as some regulators can) (p. 7).*

The APS supports the monitoring, reporting and advising functions of the proposed entity as important, yet it is unclear how, through these functions alone, it will be able to hold the Government to account and ultimately achieve its purpose of reducing suicide and suicidality among Defence and veteran members. This entity must have the authority to ensure that current mental health and suicide prevention services provided to the Defence and veterans community (e.g., Open Arms) are well-funded and adequately prioritised.

At the least, the entity will require the support of strong regulatory safeguards that protect its independence and compel the Government to take it seriously. Currently, it appears that such regulatory safeguards are absent from the proposal. The entity itself must also be accountable. This means that review, evaluation and accountability according to KPIs must also be inherent in the entity's design from the outset. In addition to Defence and veteran-specific experiences, many lessons can be learned and applied from the design and conduct of other regulatory bodies and processes (e.g., the NDIS and aged care).

Without addressing these matters in the design of the entity, there is considerable risk that the new entity will fail to be effective and become yet another disconnected fragment and layer of bureaucracy that causes disappointment, frustration and potential harm to the Defence and veteran community.

## **3. Embed a commitment to evidence-based insights and practice about mental health, suicide and trauma-informed approaches**

Veteran suicide and mental health are a complex and serious matters. To be able to effectively advise and hold the Government accountable, and to operate without causing harm, the proposed entity must deeply comprehend mental health, suicide and trauma. This understanding must be informed by both the lived experience of the Defence and veteran community, as well as mental health experts with extensive knowledge and skills of evidence-based practices, policies and systems that promote well-being, prevent mental ill-health and suicide and ensure effective and safe support and treatment for the Defence and veteran community. The APS, therefore, supports the design principle that the entity includes both the "lived experience of Defence members, veterans, family members and others with lived experience and expertise" and "operate in a trauma-informed way" (p.5).

However, we call for the expertise of the mental health sector, including psychologists, to be more clearly reflected in the design principles to ensure that this expertise is explicitly sought and integrated, from the initial design of the entity through to all levels of operation, including leadership and senior advisory positions. This will help to ensure that services provided via other agencies are of the optimal quality and provided by highly trained practitioners.

We also call for the incorporation of evidenced-based and psychological principles to be explicitly incorporated into the design principles, for example, elaborating on the design principle that the entity “operate in a trauma-informed way” by adding a statement such as *using psychological principles and evidenced-based insights*.

Making clear the entity’s commitment to the critical application of mental health, suicide and trauma-informed approaches in its systems-level work will be essential to avoid well-intentioned but counter-productive, and sometimes, re-traumatising practices (<sup>see, for example, 6,7</sup>).

As the peak national body for psychologists, the APS can contribute evidence-based insights about mental health, suicide and trauma-informed approaches that will support the design and operation of the entity in partnership with the Defence and veteran community and other stakeholders. We also call for at least one psychologist and other mental health experts to be included in formal advisory roles to support the operation of the entity once established.

If any further information is required from the APS, I would be happy to be contacted through the national office on (03) 8662 3300 or by email at [z.burgess@psychology.org.au](mailto:z.burgess@psychology.org.au)

Yours sincerely

**Dr Zena Burgess, FAPS FAICD**  
Chief Executive Officer

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