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The Secretary
Select Committee on Mental Health and Suicide Prevention
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## Inquiry into Mental Health and Suicide Prevention

The Police Federation of Australia (PFA) represents the professional and industrial interests of Australia's more than 65,000 police and is the only entity that can legitimately speak on behalf of police officers from every Australian police jurisdiction from a national perspective, hence its title as the 'National Voice of Policing'.

| PFA Membership Numbers as at 31 December 2020 |        |
|---|--------|
| AFPA  | 4,115  |
| NT  | 1,588  |
| NSW   | 16,851 |
| SA  | 4,824  |
| VIC   | 17,685 |
| TAS   | 1,375  |
| QLD   | 11,970 |
| WA  | 6,835  |
| TOTAL   | 65,243 |

Policing predominantly falls under state authority and whilst there are various entities that have a national focus on policing/law enforcement/national security, the responsibility for the mental health of police officers has traditionally rested with police agencies and their respective governments.

Policing and police officers are exposed to the issue of mental health and suicide on two fronts:

- It is widely recognised and accepted that there are numerous current serving and former police officers who are nursing debilitating psychological injuries incurred in the line of duty; and
- Policing services are one of the only services readily available on a 24/7 basis and as such, police are often the first responders to issues of members of the public suffering mental health episodes and suicides.

## Police Oath of Office

The oath of office that police swear upon attestation, makes them very different from other government workers. This oath of office, while giving police enormous powers, also places upon them great responsibility. It is this personal responsibility that differentiates the obligations of the police officer from other emergency services workers in two primary respects:

- 1. The oath of office obliges the officer to place him or herself into situations of physical or psychological danger where it is necessary to keep the peace or to protect the lives and property of members of the public. A police officer's obligation to the law places everything else in a secondary position: and
- 2. The oath obliges the officer to be on duty effectively twenty-four hours a day, seven days a week making the officer obliged to intervene in any situation where they perceive an offence is being committed, regardless of whether they are on rostered duty.

There are well documented instances of disciplinary action being taken against officers who have not fulfilled this duty. His/her office is one that is independently exercised and subject to no one's direction. Even though the powers of the constable are significant (including the power to take both liberty and life), the consequent obligations are heavy and under constant oversight.

These obligations flow also to the officer's private life. Officers may lose their employment and their career for behaviour that in all other occupations would be considered private. In many ways, the police officer "sells" more than just his or her labour when taking the oath of office.

## Stresses Within the Police Workplace

Stresses within the police workplace include:

- Consistent exposure to trauma;
- Inadequate staffing levels and a lack of resources;
- Police are the last agency of resort (eg transport of prisoners, guarding and transport
  of mental health patients and attending mental health episodes and suicides in the
  community);
- Hypervigilance;
- Fear of reporting mental health injuries to the system;
- Bureaucratic management styles;
- Perceived lack of leadership;
- Perceived lack of support from politicians and senior management;
- Perceived unfair decision-making by managers;
- Bureaucratic complaint management processes;
- Multiple layers of oversight bodies;
- Various inquiry bodies, including coronial inquiries;
- Perceived insensitivity to personal distress;
- Ever increasing workload;
- Pressure to achieve fast response times;
- Pressure on clear up rates;
- Changing nature of crime;
- Organised crime;
- Terrorism;
- Cybercrime;
- Often unreal community expectations and demands;
- Police try to be all things to all people and it's not possible;
- Intense public criticism post event;
- Media/social media;
- Police on camera all the time;
- Instant information, whether it's factual or not;
- Constant news cycle;
- Priorities constantly shifting and dictated by 'flavor of the month' issues;
- Massive changes in the way police do their work but the judicial system slow to keep pace;
- Economic factors within the workplace;
- · Budget constraints; and
- Shift work.

All the issues listed above have been found to have an impact on police officers' mental health and wellbeing.

Work done by Dr Nicholas Carleton, Associate Professor of the Department of Psychology at the University of Regina<sup>1</sup>, emphasises the unique workplace environment of public safety officers, including police "where trauma exposure is the rule rather than the exception". He says that such "exposure is different for public safety personnel than for military personnel, not better, not worse, but different. Our public safety personnel are deployed at home in an environment of ongoing uncertainty, often for decades".

Policing has also historically been seen as a male-dominated culture that encourages brute endurance and denial of mental trauma, leading to a fear amongst police that acknowledging distress will result in damage to their careers. This has been reaffirmed within the findings of numerous reviews into police mental health and wellbeing, that also cite that officers reported an inability to recognise the symptoms of mental trauma as another factor.

This is not only an issue that affects men, with an increasing focus on diversity of recruitment. Perhaps such changes in recruitment practices will have a long-term positive impact on these cultural issues within policing.

The issue of early intervention and destignatising mental health amongst police is one of our biggest challenges.

## Committee Terms of Reference

We note that the Committee's Terms of Reference indicates that you will specifically inquire into the findings of the Productivity Commission's Mental Health Report as well as the Royal Commission into Victoria's Mental Health System Report.

The Police Federation of Australia (PFA) made a submission to the Productivity Commission's Mental Health Inquiry and the Police Association of Victoria (a Branch of the PFA) made a submission to the Victorian Royal Commission and we note several issues that specifically relate to police and policing in each of those Reports.

The PFA has made numerous other recent submissions covering the mental health and wellbeing of police officers which have included the following:

- Inquiry into the Role of Commonwealth, State and Territory Governments in Addressing the High Rates of Mental Health Conditions Experienced by First Responders
- Productivity Commission Inquiry into Mental Health
- Inquiry into COVID-19
- Inquiry into Black Summer Bushfires The Royal Commission into National Natural Disaster Arrangements

<sup>&</sup>lt;sup>1</sup> Healthy Minds, Safe Communities: Supporting our Public Safety Officers through a national strategy for operational stress injuries – Report of the Standing Committee on Public Safety and National Security, House of Commons Canada, October 2016

I also have been afforded the opportunity to read and make comment on the submission to this Inquiry by the Australian Federal Police Association (AFPA), a branch of the PFA and I fully support its contents.

In respect to the above we make the following comments and recommendations.

In the PFA's submission to the Productivity Commission, we endeavoured to identify issues that we believed would have a significant positive impact, not only on the policing sector, but also the wider community.

While the issues identified in the Productivity Commissions' Reports are complex, multi–layered and more focussed on a community wide response to mental health issues, the PFA argued that such an Inquiry should not only shine a spotlight on issues within the wider community, but also on policing and other emergency services. This is because of the significant interaction police have with the wider community, both as support services for people suffering from mental illnesses, but also because of the increased propensity of our members to be sufferers themselves.

## Workers' Compensation

The Productivity Commission Report indicates that "...only about 6% of all workers compensation claims in Australia are for work related mental health conditions, the cost of these claims is typically about 2.5 times the cost of other workers compensation claims, involve 2.5 times more time off work (the median time off work for mental health related workers compensation claims is 16 weeks, compared with 6 weeks for other claims), and are much less likely to be accepted".

The Report further states that, "...occupations with the most work-related mental health claims have been police, fire fighters and defence force members (9% of all serious claims)..."

Anecdotal evidence suggests that the rate of workers compensation claims for mental health injuries for police, is a lot higher than the 9% suggested in the Report.

The Beyond Blue Australia: Answering the Call National Survey Report identified that three in four first responders found the current workers compensation process to be detrimental to their recovery. Many police argue that the arduous and unhelpful process of making a claim, often stands in the way of many members getting quick access to effective treatment.

Members with insurance claims have reported that they have felt "isolated from their employers and former colleagues" with reports that police officers making psychological damages claims waiting an average of six years to settle.<sup>3</sup>

"Making a workers' compensation claim can be a stressful experience in and of itself, and questions have been raised as to whether the claims process is helpful or harmful to the recovery of people with mental health conditions. These include concerns as to whether the workers' compensation system, having originally been designed for helping those who incur physical injuries at work, is more suited to physical injuries than mental health problems, whether the adversarial nature of the process exacerbates stress-related conditions, and whether cost-pressures and the desire to identify possible fraud place unduly high burden on people with mental health issues to prove they have a mental health condition"<sup>4</sup>.

The PFA acknowledges however, that some providers of claims processing services, have been working diligently to overcome this issue.

Research shows that people who seek compensation for PTSD are <u>more likely to have a poorer prognosis</u>, more severe symptoms and longer recovery time than those who haven't sought compensation.

According to findings, there are plausible reasons for this pattern including:

- people seeking compensation are doing so because their psychological injury is more severe; and
- the claims process is prolonged, triggers further stress and exacerbates symptoms or otherwise hinders recovery<sup>5</sup>.

Issues brought to the PFA's attention during the compilation of this submission impacting on members seeking support during the processing of claims include:

- The process involved in many workers compensation claims have actively prevented members from returning to good health;
- Have prevented members from returning to work; and

<sup>2</sup> Patty, A. "Police on the Scrap Heap – Public Campaign for Insurance Claim." *Sydney Morning Herald,* November 01, 2015. <a href="https://www.smh.com.au/national/nsw/police-on-the-scrap-heap--public-campaign-for-insurance-claim-20151101-gknxst.html">https://www.smh.com.au/national/nsw/police-on-the-scrap-heap--public-campaign-for-insurance-claim-20151101-gknxst.html</a>

<sup>&</sup>lt;sup>3</sup> Pike, B. "Traumatised Police Officers Waiting Six Years for Claims as Insurance Companies Drag Heels." *The Sunday Telegraph*, July 09, 2017. <a href="https://www.dailytelegraph.com.au/news/nsw/traumatised-police-officers-waiting-six-years-for-claims-as-insurance-companies-drag-heels/news-story/94f7c64c108c0eba7faebe71e61a83a7">https://www.dailytelegraph.com.au/news/nsw/traumatised-police-officers-waiting-six-years-for-claims-as-insurance-companies-drag-heels/news-story/94f7c64c108c0eba7faebe71e61a83a7</a>

<sup>&</sup>lt;sup>4</sup> Kyron, J., Rikkers, W., O'Brien, P., Bartlett, J. & Lawrence, D. "Experiences of Police and Emergency Services Employees with Workers' Compensation Claims for Mental Health Issues" Journal of Occupational Rehabilitation (2021) 31:197-206, Published online: 02 July 2020

<sup>&</sup>lt;sup>5</sup> Skeffington, P. "One in Five Police Officers Are at Risk of PTSD- How Do We Respond" Australian Emergency Services Magazine, Published online: 06 January 2017 <a href="https://ausemergencyservices.com.au/emergencyservices/police/one-in-five-police-officers-are-at-risk-of-ptsd-how-do-we-respond/">https://ausemergencyservices.com.au/emergencyservices/police/one-in-five-police-officers-are-at-risk-of-ptsd-how-do-we-respond/</a>

• When members have returned to work, often times treatment is taken away thus making it difficult for members to remain at work.

It has also been suggested that in some jurisdictions, key performance indicators had been imposed on those agents tasked with processing claims as well as performance based bonuses to agents.

## Presumptive Legislation

Efforts to lobby various governments for presumptive legislation has been undertaken in some jurisdictions with varying success.

The legislative recognition of PTSD as an occupational illness for Emergency Services Workers would:

- Recognise the value and risks associated with the work performed by Emergency Services Workers';
- Acknowledge the psychological toll that repeated exposure to trauma has on our Emergency Services Workers';
- Remove barriers to obtaining treatment by providing our Emergency Services Workers suffering PTSD with fair access to worker's compensation benefits by reversing the onus of proof so that the employer must show that PTSD was not caused by work; and
- Remove the adversarial approach to PTSD claims that will reduce the stress and anxiety already felt by emergency Services Workers and enable earlier treatment, so they make a speedier recovery and return to work sooner.

The Canadian Police Association, together with their local and provincial police associations have affectively lobbied some provinces for presumptive legislation to reverse the burden of proof for those who have been diagnosed with PTSD.

## Provisional Acceptance of Claims

In tandem with Presumptive Legislation, should be support for legislation that underpins the Provisional Acceptance of claims. Such a move would go a long way to reducing the trauma on officers during the difficult process of making a workers' compensation claim for psychological injury.

Provisional acceptance of claims would allow our members to access services immediately following an incident and maintain that support throughout any subsequent proceedings.

This would take some of the immediate stress away from the injured worker and their family by ensuring that the insurer commences the immediate payment of any claim,

including medical expenses, but also protects the insurer by allowing them not to admit liability at this early stage.

Accepting provisional liability allows the insurer time to make a more informed decision on liability and at the same time allows the injured worker to provide more information/evidence that might be required, whilst being paid the provisional claim.

## Death and Disability and Income Insurance

In 2018 the PFA made a detailed submission to the Productivity's Review - Superannuation: Assessing Efficiency and Competitiveness. In that submission we raised the important issue of the potential inadequacy of default, or automatic death and disability insurance arrangements and income protection, for police in a number of jurisdictions. The dangerous nature of police work, including their greater exposure to mental health injury, means that the issues of appropriate death and disability insurance, total and permanent disability cover and income protection, which for professions such as policing can be cost prohibitive, are vitally important.

Our fears are that members might be swayed solely by promoted higher investment returns in some funds, but those funds lacking adequate cover as outlined above.

Whilst the PFA recognises that many of these issues are matters to be discussed at jurisdictional level, with the appropriate superannuation fund, the majority of superannuation is controlled by the Australian Government and could have a significant bearing on the outcome of such discussions.

For example, the PFA strongly believes, that for professions such as ours, compulsory insurance premiums, including death and disability and income protection insurance should be excluded from superannuation's concessional cap calculation as most of those arrangements are provided through our superannuation schemes. Such an arrangement could deter police from ensuring appropriate insurance cover.

The PFA seeks the support of the Parliament for ongoing meaningful discussions to ensure that police don't suffer unintended consequences of any additional legislation around superannuation.

## Improving Mental Health Outcomes for People in the Justice System

We note the comment in the Productivity Commission Report and the Victorian Royal Commission in regard to supporting police and people with mental illness in their interactions. All police jurisdictions have developed detailed MOU's with respective health departments and ambulance services which include police duties in hospitals as well as protocols for dealing with members of the public suffering mental health episodes.

While many jurisdictions are now also engaging teams of mental health specialists to assist police acting as first responders to such incidents there are still jurisdictions which are struggling to alleviate the over reliance of police in this space.

## Other Initiatives within Policing

The PFA and its Branches have undertaken a range of other initiatives and studies in an endeavour to minimise mental health impacts of their work on its members.

## Beyond Blue Australia Answering the Call National Survey

The Beyond Blue Australia, *Answering the Call National Survey*, National Mental Health and Wellbeing Study of Police and Emergency Services Final Report (2018) supported all of the observations raised above.

The Report found that employees in the police and emergency services sector had substantially higher rates of psychological distress and probable PTSD, compared to the Australian population and workers in other industries, including the Australian Defence Force, with police highest amongst all the emergency services.

A synopsis of the survey report shows that –

- One in three employees in the emergency services sector experience high or very high psychological distress; much higher than the national average;
- More than one in 2.5 employees in the emergency services sector report having been diagnosed with a mental health condition in their life compared to one in five of all adults in Australia;
- They report having suicidal thoughts over two times higher than adults in the general population and are three times more likely to have a suicide plan;
- More than half of all employees indicated that they had experienced a traumatic event that had deeply affected them during the course of their work;
- Poor workplace practices and culture were found to be as damaging to mental health as occupational trauma;
- Those who had worked more than 10 years were almost twice as likely to experience psychological distress and were six times more likely to experience symptoms of PTSD;
- Three in four found that their current workers compensation process to be detrimental to their recovery; and

 One in four surveyed former employees experienced probable PTSD (compared to one in 10 current employees) and one in five experienced very high psychological distress.

The above paints a very distressing picture of the state of mental health and wellbeing of Australia's police and other emergency services personnel.

### Blue Hub

The creation of a dedicated national independent service provider network – the Blue Hub

In the 2019 Federal Budget the Government announced the establishment of the Blue Hub Project, a framework for Police and Emergency Services Mental Health, to be piloted in both Victoria Police and the Australian Federal Police.

A Grant of \$2.75 million (inclusive of GST) was provided as part of the Community Health and Hospitals Program (CHHP) and specifically related to Mental Health projects that aim to improve access to mental health services including suicide prevention programs under the CHHP. The funding runs from July 2019 until 31 October 2022.

The aim of the project was to support the health and wellbeing of police officers by providing them with early intervention, accurate diagnosis and treatment and access to appropriate specialist mental health services through the BlueHub project. The project consists of the development and implementation of a clinical assessment framework and related research, training and development resources for mental health practitioners to provide appropriate specialist mental health support to police officers.

The project is currently being rolled out and includes –

- The contracting of an organisation (Phoenix Australia), to assist with the oversight and implementation of the project, including;
- Establishing an external network of specialist mental health service providers in a number of city and satellite sites;
- The development of a BlueHub clinical assessment framework for best practice and intervention;
- Developing and implementing and appropriate referral pathways for police to ensure access to the BlueHub services;
- The commencement of specialist mental health services available to police officers;
- Overseeing an external network of specialist mental health service providers to deliver services consistent with the BlueHub model;

- Undertake ongoing performance monitoring and evaluation; and
- Complete a comprehensive evidence-based project evaluation.

The roll out of the model thus far has been well patronised and endorsed by police who have participated in the project.

## **Equipt App**

The 'equipt' app https://appadvice.com/app/equipt/1150185029 was officially launched in September2016. As at February 2021 there have been 25,009 Unique App downloads of the app.

Developed by the Police Association Victoria (TPAV) in conjunction with Victoria Police, with specialist input from Phoenix Australia - Centre for Post Traumatic Mental Health, the app is designed for current and former sworn officers, police employees and their families and provides tools that can help users strengthen their physical and mental wellbeing and manage their mood and mindset to help control stress levels.

The *equipt* app has been successfully adapted to every police jurisdiction in Australia and New Zealand, with each jurisdiction having their own personalised look and feel with support services listed as relevant to their user-base.

Each new version of the app has brought new and enhanced features to further personalise the user experience including rostering and sleep hygiene functions and upgraded GPS rostering.

The app has also drawn interest from the international police community with the equipt project team making a presentation to the International Council of Police Representative Associations<sup>6</sup> (ICPRA) biennial conference in September 2018 in Canberra.

As a result, Canada is now introducing the app and Scotland is likewise evaluating its introduction into that country.

## National Awareness Campaign on Police Officer Mental Wellbeing

In 2017, the PFA secured a \$1 million-dollar grant from the Proceeds of Crime Account (POCA) (Section 298) to fund a National Awareness Campaign on Police Officer Mental Wellbeing.

Two key elements of the campaign, a song Graduation Day, by acclaimed Australian recording artist John Schumann and a telemovie Dark Blue, were released in early April and May 2019, respectively.

<sup>&</sup>lt;sup>6</sup> ICPRA is the international network of police unions has in excess of 1.5 million members affiliated through national police associations and federations with unions from four continents speaking over 30 languages.

The major thrust of the campaign was planned to break down the stigma attached to emotional illness and for officers to feel comfortable to say that they are doing it tough.

The PFA has been using the campaign as the beginning of educational and support activities funded by the federal government. The second phase of the campaign is currently being undertaken by the registered police charity, the Police Foundation, with the support of the PFA.

In this campaign we are building a web portal, which is being designed:

- As a single point repository of information (a one stop shop), that will enhance members, their colleagues and family's literacy around mental health issues;
- To break down the stigma, particularly self-stigma, associated with mental health injuries; and
- To encourage early intervention and help seeking for members who are suffering from mental health illness.

The portal will address a wide range of mental health and well-being issues, including:

- Links to other appropriate websites and activities, both nationally and internationally;
- Information for family and colleagues;
- Information on the eradication of stigma; and
- Mental health stats and facts to build mental health literacy amongst users.

The portal will also be a repository for a series of training/educative videos, which were in the development stage at the advent of the COVID-19 crisis.

These videos are planned to build upon the important concepts raised in POCA Phase I, in the telemovie *Dark Blue* and the song *Graduation Day*. They will also link with the issues identified in the handbooks, *Head Notes* and *A Cop in the Family*, produced as part of the initial awareness campaign. The building on existing concepts and the mental health journeys reduces the cost of the overall project and promotes better mental health outcomes and resilience.

The POCA II project has identified 11 key issues to be dealt with in the short videos:

- Mental-health risks for police;
- Depression;
- Anxiety;
- Destructive thinking disorder;
- Acute stress disorder; post-traumatic stress disorder;

- Mental health and relationships;
- Mental health and finances;
- Mental health and drugs;
- Supervisor's management style;
- Mental health and alcohol; and
- Suicide.

These are the issues identified in the telemovie, the song and the two handbooks provided by Phase I funding. The videos, which will be ideal for police training purposes, will also explore various:

- Self-help strategies;
- Pathways to help;
- Self-help/interactive capabilities; and
- Family engagement.

The web portal will also be the home for the workplace posters, the booklets and any other collateral (printed or audio visual) developed during phases I and II of the campaign.

The Police Foundation is also working closely with the PFA and the Police Association Victoria (TPAV), to make this web portal the focal point for information on the BlueHub support network, announced by the Federal Government in the lead up to the 2019 federal election.

The web portal will be able to be updated and have "live" activity, with the capacity for podcasts and the like, and will continue to be built and refined with contemporary material during the life of the Phase II Grant and beyond.

This project will also link with the other initiatives announced by the Government in the lead up to the 2019 federal election, as well as the numerous other activities and initiatives in the mental health area taking place, not only across every police jurisdiction and wider emergency service agency across the country, but internationally as well.

The broad outcomes of the multifaceted and integrated program are anticipated to include:

- Increased awareness of social and emotional well-being/mental health issues including, but not limited to, psychological injuries incurred by members;
- An established and accepted connection between social and emotional well-being/mental health issues and personal and professional safety;
- Development and implementation of strategies to help preserve members' social and emotional well-being/mental health;

- Development of culturally relevant and accessible collateral, materials, avenues and pathways to information and help with regard to social and emotional wellbeing/mental health;
- Encourage early help seeking; and
- Point to pathways for help.

There are also numerous activities currently being undertaken by state governments, state and territory police departments, police associations/unions and the Police Federation of Australia – all seeking to advance the mental health and social/emotional well-being of police officers.

Outside the police arena, there is also a range of external agencies and other bodies, nationally and internationally, addressing the mental health and well-being of police and other first responders. These activities include but are not limited to mental health and well-being programs, the production of educational/promotional collateral, data collection and analysis and academic research.

Notwithstanding all the good work being done, there is a clear lack of coordination regarding these efforts. Over and above this lack of coordination, much of the work lacks cultural context and a robust sense of reality. This is understandable given the nature and the sensitivities of bureaucratic/management structures.

Ultimately, however, the PFA and the Police Foundation are seeking to prosecute a major cultural shift and it is the Foundation and the PFA and its branches which, unhampered by politics and departmental sensitivities, can engage in truthful, fact-based dialogue with the members and their families.

By using the PFA and the Foundation, it also gives officers some comfort that their interactions "online" will not be available to their respective police departments. This has often been raised as a reason some members do not seek assistance – it is the fear of what it might mean to their careers. Research has shown accurate disclosure of mental health symptoms through employer lead screening cannot be assumed. Studies have shown that employees under-reported symptoms of mental health disorders and that officers suffering high levels of mental distress also were less likely to report<sup>7</sup>.

Both the Foundation and the PFA are seen as independent enablers.

Phase II of the campaign will continue to educate and build resilience in police officers in the areas of social, emotional and psychological health associated with policing as well as outlining how to recognise early warning signs and identify the services available to support them. The continued aim of the project is to promote early intervention so that officers can

<sup>&</sup>lt;sup>7</sup> Marshall, R. Et al. "Mental Health Screening Amongst Police Officers: Factors Associated with Under-Reporting of Symptoms" BMC Psychiatry (2021) 21:135 <a href="https://doi.org/10.1186/s12888-021-03125-1">https://doi.org/10.1186/s12888-021-03125-1</a>

return to work as soon as practicable to support their role of preventing crime and implementing law enforcement measures.

By achieving that aim we will also destignatise the issue of mental health amongst police and encourage early help seeking.

## Flexible Working Arrangements for Work Life Balance

In 2017, the PFA conducted a Flexible Work Arrangements (FWA) survey across Australia and New Zealand, which was undertaken by 11,418 police officers, 16.5% of the two countries total police workforces.

Outcomes of that survey indicate that the benefits of FWAs are significant and access to them is appreciated by officers and their families. At that time there was a reported 5,530 police officers working FWAs, equating to 9% of the two countries surveyed, police workforce.

Evidence from the survey suggests that FWAs can mitigate many of the work stress factors affecting police officers. Almost all measures of job satisfaction collected show better outcomes for those working FWAs than for regular full-timers. Qualitative data strongly suggests that FWAs allow retention of staff who would otherwise leave the police force, and that for many respondents their commitment to a policing career is increased as a result.

## Stress and Work Life Balance

Data for those on FWAs was compared to aggregated data for all police.

There were few differences in the proportions of police on FWAs taking time off for illness and all police taking time off for illness. However, a significantly smaller percentage of police on FWAs took time off for both injury and stress, compared with the percentage of the total police population taking time off.

Rates of absenteeism in general were very high - more than a third of police had at least a day off due to illness in the preceding month, and over a fifth had at least a day off due to stress. These patterns support comments made by many police about high levels of sick leave and stress leave and the negative impact this has on rostering generally. The results are consistent with a minimum of around 10 days off a year per officer on stress leave — about three times the national average.

The generally lower rates of time off for stress for those on FWAs is an important finding. Factors that may possibly contribute are –

- the overall younger age of those working FWAs,
- the fact that their rosters allow them more down time to recover from work stress, and
- the duty types which are undertaken by those on FWAs.

Further research however is needed to clarify this result, and to investigate linkages between roster and duty types and stress.<sup>8</sup>

The most frequently identified factor in workplace stress, by nearly 50 percent of police, is lack of support from management, which has been strongly supported in the Beyond Blue *Answering the Call National Survey* outcome. Workload and resourcing issues are rated as significant factors by about 40 percent of police. Across the board, those on FWAs rate these factors as less important than other police, which suggests that being on a FWA can mitigate many elements of work-related stress.

Only two factors were identified as being more significant by those on FWAs than by all police. High self-expectations are the most frequently identified factor by those working FWAs. Based on themes from the qualitative data, we suggest that this pattern may relate to the fact that those on FWAs feel they need to try harder, perform better, and achieve more in their role than other officers.

Other officers also experience high self-expectations as stressful, to a significant degree, but it is not the main factor they identify. Attitudes of fellow officers makes the least contribution to stress for all police officers, at 15 percent, but for those on FWAs it is slightly more important.<sup>9</sup>

Another important finding in the study was that more than half of all police officers agree that police officers will be more satisfied if greater flexibility is introduced in their workplaces, leading to better policing outcomes.<sup>10</sup>

## Burnout, Fatique, and Transitioning to Retirement

Respondents also talked about stress, burnout and increasing fatigue at work, often saying how many years they have done shift work and commenting on the toll taken on their health and family life. Specifically, some are still doing frontline roles as they come into their fifties and feel the long-term consequences of this.

Transition to retirement is an uncommon reason for FWAs at present, with less than two percent of the total number of current FWAs for this reason, and most of these are for males over 50. However, around 13 percent of future requests for FWAs are likely to relate to transition to retirement.

Over 750 requests for transition to retirement FWAs from male police officers aged over 50 are projected, based on survey responses, with very few requests coming from women. Although very small in number, the data suggests that requests from women aged

<sup>&</sup>lt;sup>8</sup> Cole, M and Sanderson, C. Flexible Working Arrangements for Police in Australia and New Zealand Summary Report Nov 2017 pg 22

<sup>&</sup>lt;sup>9</sup> Cole, M and Sanderson, C. Flexible Working Arrangements for Police in Australia and New Zealand Summary Report Nov 2017 pg 26

Cole, M and Sanderson, C. Flexible Working Arrangements for Police in Australia and New Zealand Summary Report Nov 2017 pg 71

over 50 for FWAs due to transition to retirement could also increase as a proportion of all requests from women officers in the over 50 age bracket over the next five years<sup>11</sup>.

Long commutes are also mentioned by some respondents as impacting upon work life balance. The 2016 census data reveals that in NSW 17% of all police service staff travel 50klm and over to work. In Victoria that is 10% and Queensland 7%. This is particularly an issue for those members working in major metropolitan centres.

### Blue Card

The PFA supports the provision of a Blue Card, similar to the DVA Veteran's White/ Gold/Orange cards provided to defence force personnel through the DVA, to current serving police officers and former officers, to facilitate their treatment for mental health conditions.

The provisions of such a card to police and former police, fits neatly with the BlueHub concept of a network of mental health providers for, currently being developed through federal government funding.

To assist in the proper function of the BlueHub network, the issuing of the Police Blue Card, with similar benefits to the DVA White Card, that allow the holder access to care and treatment for accepted injuries or conditions that are service related.

Such a card, with all the suggested benefits attached, would complement and expand on any support that is currently available to former police officers. It would also ensure that there were no gaps in services provided for their mental health needs.

## Complaints Handling

Another factor that causes significant stress to police is the time it takes to resolve complaints against them.

To assist in alleviating the stress on police caused by complaints against them is to ensure the timely completion of such investigation and the issue of the suspension of police without pay whilst investigations are taking place, should be the last resort and only used after the conviction of an officer for what would be a dismissal type offence.

Any complaints handling system need to ensure procedural fairness and natural justice for those accused of misconduct.

Police Superannuation - Preservation Age and Super Guarantee Levy

<sup>&</sup>lt;sup>11</sup>Cole, M and Sanderson, C. Flexible Working Arrangements for Police in Australia and New Zealand Summary Report Nov 2017 pg 94

<sup>&</sup>lt;sup>12</sup> Cole, M and Sanderson, C. Flexible Working Arrangements for Police in Australia and New Zealand Summary Report Nov 2017 pg 97

One of the most pressing issues for police, in respect to superannuation, is the need to recognise their special needs by ensuring a preservation age that allows for officers, who have dedicated their working life to community service, to be able to retire with dignity.

Continuing to raise the preservation age for access to superannuation (up from age 55 to 60, and potentially beyond) will come with major consequences for both the publics and police safety. The danger in <u>forcing</u> officers to remain on the front line past 60, is obvious.

The PFA is firmly of the view that a federal government must:

- Recognise the special needs of police officers; and
- Legislate a preservation age which allows police after dedicating their working lives to community service to retire with dignity.

We have earlier raised the complex range of mental health risks that police officers face after a career of community service. The physical and psychological rigours of operational policing are widely known and accepted, and non-operational positions, which police officers might once have moved into in their senior years, are now considerably few — in light of the civilianization and outsourcing of noncore functions.

The PFA argues that a federal government must also support schemes which guarantees police a solid level of accrued superannuation benefits by the time they retire and timely access to those benefits.

Clearly, superannuation laws apply a community-wide standard preservation age, which arose in 1993. The *Superannuation Industry (Supervision) Act 1993*, however, includes the power to exempt specified categories of people in order to provide a more flexible retirement regime.

The legislation therefore acknowledged at the time, that a one-size-fits-all approach was not necessarily suitable for the entire workforce.

The modern workplace provides flexibility for employees to retire at an age beyond 60 or 65 and to exit and re-enter the workforce according to their own circumstances.

The PFA supports this flexibility for later retirement but insists that earlier retirement option for police should also be part of any flexible arrangement.

## Conclusion

We trust that the foregoing has given the Committee a clearer understanding of the complexities confronting police of the issue of mental health and wellbeing in the Australian community, including the police community.

Not only do police officers have to deal with sufferers across the community, they do so in the knowledge that their profession is one of the most affected by the virtue of their work. So, on the one hand police officers are respectfully dealing with sufferers, while potentially being a sufferer themselves.

Whilst we understand that the Committee may seek to deal with broader community issues, we suggest that attention needs to be given to those who deal with patients with mental illness, and who may suffer from the same afflictions. It is clear from all the evidence, that this cohort includes a large number of police.

In summary the PFA lists the following eight recommendations for the Committee's consideration:

### **RECOMMENDATION 1**

That the Committee recommend that the issue of Presumptive Legislation, recognising psychological injuries to police and other first responders, be progressed with a view to the development of harmonised legislation across every jurisdiction.

### **RECOMMENDATION 2**

That the Committee recommend that the issue of the Provisional Acceptance of claims for psychological injuries to police and other first responders, be progressed with a view to the development of an intergovernmental agreement on the issue.

### **RECOMMENDATION 3**

That the Committee recommend that compulsory insurance premiums for police and other emergency services workers, including death and disability and income protection insurance, be excluded from superannuation's concessional cap calculation.

### **RECOMMENDATION 4**

That the Committee recommend that all workers compensation systems for police deliver timely assessment for claims in a way that protects those who are distressed and psychologically unwell.

## **RECOMMENDATION 5**

That the Committee recommend that the Federal Government work with state and territory government to provide eligible police and former police, with a Blue Card, with similar benefits to the White Card provided under the DVA for defence force personnel.

### **RECOMMENDATION 6**

That the Committee recommend that police officers continue to be allowed to retire and access their superannuation entitlements from age 60 with no penalty, be in taxation or other, for accessing their entitlements at such an age.

### **RECOMMENDATION 7**

That the Committee recommend that the Government continue to support the Blue Hub Project being trialled by the Police Association Victoria and the Australian Federal Police Association, being extended to include a further police jurisdiction, Queensland.

### **RECOMMENDATION 8**

That the Committee recommends to Government that the Superannuation Guarantee levy continue to increase to 12% as proposed in current legislation to allow police to retire with dignity.

We thank the Committee for the opportunity to make this submission on behalf of Australia's Police. The PFA offers any further support to the Committee that you deem appropriate including appearing to give evidence if requested.

Sincerely yours



Chief Executive Officer 24 March 2021