



Department of
Jobs, Tourism, Science
and Innovation



WA Veterans Legislation Review

Issues paper | November 2022





Message from the Minister

Supporting and recognising the contributions of Western Australian veterans and their families is important to the Western Australian Government. For those men and women who have served in the Australian Defence Force, their transition to life beyond the military can be a challenging journey. To support veterans and their families, the Western Australian Government together with Ex-Service Organisations and Veteran Service Providers offer services that assist with education, employment, health and wellbeing.

Western Australia has an existing framework of legislation designed to support the interests of veterans, which includes the *Western Australian Aged Sailors, Soldiers and Airmen's Relief Fund Act 1932* and the *Anzac Day Act 1960* (the Acts).



It is essential that this legislation for veterans remains robust and relevant to the contemporary needs of veterans. It is also critical that this legislation establishes effective governance to ensure that grants administered by government meet the needs and expectations of the Western Australian community.

The *Western Australian Veterans and Families Strategy 2019* identified the need to review current veteran's legislation to ensure this is the case. I endorsed Terms of Reference for the review of the WA Veteran's Legislation in July 2022. The review process offers a key opportunity to examine the effectiveness of the Acts.

This Issues Paper identifies issues related to the currency and relevancy of the legislation and highlights opportunities to enhance the legislation to better meet the current and future needs of Western Australia's veteran's community.

I welcome the views of all interested members of the community to help shape better outcomes for our veterans. This Issues Paper is available for public comment over a six-week consultation period, with submissions closing on Friday 03 February 2023. A stakeholder feedback form is [available online](#) to help us to collate stakeholder feedback received.

I look forward to hearing from diverse voices in our community.

The Hon Paul Papalia CSC MLA
Minister for Veterans Issues



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1. Introduction

In 2019, the Western Australian (WA) Government endorsed the *Western Australian Veterans and Families Strategy*¹ (the Strategy). An action stipulated in the Strategy states a requirement to undertake a review of the existing WA Veterans legislation to ensure they remain fit for purpose and meet the needs of the veterans' community.

The WA Veterans legislation referred to above, and the subject of this Issues Paper, include:

- The *Anzac Day Act 1960* (WA),² (Anzac Day Act); and
- The *Western Australian Aged Sailors, Soldiers and Airmen's Relief Fund Act 1932* (WA),³ (WAASSARF Act).

The Department of Jobs, Tourism, Science and Innovation ('the Department') is the agency responsible for administering the State's veteran issues portfolio and tasked with reviewing the veterans legislation. The Review of the WA Veterans Legislation (the Review) will produce a report by April 2023 for the WA Minister for Veterans Issues. The Minister endorsed Terms of Reference (ToR) for the Review in July 2022. The Review will examine to what extent the two Acts above are 'fit for purpose' and reflect the current and future economic and social wellbeing needs of the WA veteran community. The Review will identify if amendments to the Acts are required and, if so, provide options for consideration by the Minister for Veterans Issues.

To provide context, this Issues Paper will provide an overview of the purpose and function of the Anzac Day Act and the WAASSARF Act, and briefly describe similar legislation in other jurisdictions. The paper also identifies current issues with the operation of the legislation and highlights opportunities for reform.

This paper invites comment from veteran stakeholders and other interested members of the public that will assist the Department to gain a broader understanding of relevant issues of concern to stakeholders as part of the Review process.

1.1 Key Terms Used

For the purposes of this Issues Paper, **fit for purpose** refers to the measure of effectiveness of the veteran's legislation in WA to achieve an expected outcome. In this case, the desired outcome is ongoing delivery of support services to meet the economic and social needs of local veterans and their families.

¹ Department of Communities, 'Western Australian Veterans and Families Strategy', *Department of Communities* (Perth, 2019), <https://www.wa.gov.au/system/files/2020-08/wa-veterans-and-families-strategy.pdf>, accessed 19 September 2022.

² *Anzac Day Act 1960* (WA)

³ *Western Australian Aged Sailors, Soldiers and Airmen's Relief Fund Act 1932* (WA)



A **'Veteran'** refers to a person who has served, or is serving, as a member of the Permanent Forces of the Australian Defence Force (ADF) or as a member of the Reserves⁴.

'Ex-Service Organisations' (ESOs) refers to organisations that maintain a membership of veterans, usually to provide a sense of community and to advocate for the specific needs of its membership.

'Veteran Service Providers' (VSPs) includes all organisations, whether commercial, not for profit or volunteer run, whose primary purpose is to deliver a service to the veteran community. ESOs who seek to provide a service for the veteran community beyond their membership are for the purposes of this document, considered VSPs.

2. The Role of the WA Government in Veterans' Issues

According to the 2021 Australian Census, there are 65,083 veterans living in WA.⁵ Of these, approximately 5,000 to 6,000 having served since 1999. Approximately 350-450 members of the ADF transition to civilian life in WA each year.⁶ More than 103,000 Australians have been killed in the service of the nation's armed forces since Federation.⁷

The Department of Veterans' Affairs (DVA) has primary responsibility for developing and delivering programs that support ex-service members and their dependents. DVA acknowledges issues with veteran engagement. Of the possible 581,800 veterans⁸ across Australia, DVA engages with 199,536, or just over 1 in 3 veterans.⁹ Often, it is state level front line caseworkers that are the first point of contact for veterans seeking assistance.

The WA Government adopts a role in providing additional means of supporting and recognising the veteran community. ESOs and VSPs provide a vital means of delivering support to the veteran community.

The purpose of the Strategy is to provide the overarching rationale for the development and implementation of policies and initiatives that promote the wellbeing of veterans, commemorate the service and sacrifice of our military personnel, and firmly establish WA as a State that welcomes and supports our veterans and their families. The Strategy adopts a strengths-based approach to veterans issues, identifying Australia's military service men and

⁴ *Australian Veterans' Recognition (Putting Veterans and their Families First) Act 2019* (Cth), s. 4

⁵ Australian Bureau of Statistics, 'Australian Defence Force service', ABS (29 June 2022).
<https://www.abs.gov.au/articles/australian-defence-force-service>, accessed 20 September 2022.

⁶ Department of Defence (Australian Government), 'Separations Data Set' (Canberra, Feb 2021) on file at Department of Jobs, Tourism, Science and Innovation.

⁷ Australian War Memorial, Roll of Honour. Deaths as a result of service with Australian units | Australian War Memorial (awm.gov.au) accessed 23 September 2022.

⁸ Australian Bureau of Statistics, 'Australian Defence Force service', ABS (29 June 2022).

⁹ Department of Veterans' Affairs (Australian Government), 'Veteran Mental Health and Wellbeing Strategy and National Action Plan 2020-2023', (Canberra, 2020), p. 21,
https://www.dva.gov.au/sites/default/files/veteran_mh_wb_2020-2023.pdf, accessed 21 September 2022.



women as among the best in the world. These people have undergone a rigorous selection process, completed high quality specialist training, and been tested by a range of experiences both in Australia and overseas, often in austere and hazardous situations.

3. Background

3.1 Purpose of the WA veteran's legislation

The purposes of the WA veterans Acts are summarised below.

Box 1. The WAASSARF Act

The WAASSARF Act establishes a Relief Fund with the purpose of providing benefit to aged and/or invalid sailors, soldiers, airmen and nurses who are veterans, and residents in WA, and for any person who, immediately before their death, was the spouse or de facto partner of that person. Under this Act, the funds are held in trust, with the operation of the Relief Fund vested in three trustees appointed by the Western Australian Governor. The State Executive of the Returned and Service League, Western Australian Branch (RSLWA) nominates one trustee.

The WAASSARF Act provides the authority for RSLWA to be the sole recipient of funds raised through the annual Poppy Day appeal. The Act stipulates all money raised by any person or organisation is payable to the RSLWA. Where money is raised by a sub-branch of RSLWA, half the amount raised is payable to the Relief Fund administered by the Trust, with the remainder to be used for similar purposes for the benefit of the sub-branch members. RSLWA bylaws relating to welfare provide clarification on who may be eligible to receive monetary benefits from the sub-branch funds.

The Relief Fund serves the aim of alleviating immediate financial stress for veterans and their families who are suffering financial hardship. The Board of Trustees consider the merits of applications referred to them by the Welfare Officer at RSLWA. One or more of the trustees will generally interview the applicants and where the trustees agree, pay a sum of money for a particular purpose. These sums are considered interest free loans however, in practice most loans are in effect, grants. These loans are provided for the purchase of whitegoods, bonds on rental agreements or other purposes that allow the recipient to maintain a basic standard of living where they may not have been able to afford to do so.

From historical records dating back to 1937, it is apparent the Board of Trustees under the WAASSARF Act operate the Relief Fund in a similar manner today. The Relief Fund has operated in line with its original purpose and intent for 90 years. It has also benefited from sound stewardship and, consequently the Relief Fund has accrued a significant balance from monies raised through the annual Poppy Day appeal and other beneficiary arrangements. The Relief Fund is not reliant on revenue through the WA Government budget.



Box 2. The Anzac Day Act

The Anzac Day Act establishes the Anzac Day Trust and sets requirements for activities held on Anzac Day, including the restrictions in Western Australia of racing and sporting events prior to 1 pm on 25 April every year. Where these events are large scale (in excess of 5,000 patrons) and professional in nature, the Act prescribes a financial contribution to the Anzac Day Trust for funding projects that benefit the WA veteran's community. Authority to disburse funding is vested with the WA Minister for Veterans Issues, under advice from the Board of Trustees. The WA Minister for Veterans Issues appoints the trustees. This Act also decrees Anzac Day as a national day of remembrance, consistent with other similar Anzac Day legislation across Australia.

The WA Government also provides an annual grant to the Anzac Day Trust for allocation to various community projects. In 2021-22, the Government awarded to the Anzac Day Trust an appropriation from the State budget of \$1.3 million per year for three years.

The Anzac Day Trust grant program administered by JTSI receives applications for community projects that require funding. Examples include establishment of a veteran and families employment program, the development of the Veteran Central operating plan, capital costs for the construction of commemorative monuments, accommodation and housing initiatives, and community connection and therapy programs. Typically, there are 16-20 applications to the Anzac Day Trust for grants totalling in the order of \$2 million. The trustees consider the merits of each application based on the benefit to veterans, their families and the broader community. The trustees make recommendations to the Minister for Veterans Issues for final determination.

The trustees have worked in recent years to bring a level of coherence to the VSP landscape. For example, in 2021 the Anzac Day Trust received five separate grant applications to assist veterans into employment. Funding all five applications would disperse the effects achieved by funding across these separate programs and create a confusing service provider environment for veterans. The trustees selected the two applicants who proposed to link veterans and immediate family to employers and invited the applicants to develop a joint proposal. The resulting partnership successfully placed 82 veterans and 3 veteran spouses into employment between January and July 2022. This successful outcome has attracted interstate interest from veterans and one enquiry from New Zealand (NZ).

In recent history, the Anzac Day Trust has not received any monies from large racing and professional sporting events held on Anzac Day in WA. Consequently, the Anzac Day Trust is wholly reliant on an annual budget appropriation from the WA Government. This situation has constrained the funds available for veteran specific initiatives in the State and has meant major sporting events that benefit from ANZAC related branding make no contribution to veteran welfare. This aspect of the Anzac Day Act is not 'fit for purpose' and is an important consideration in this Review process.



3.2 Comparison of the WA Veterans Legislation – snapshot view

Table 1 highlights the similarities and differences of the two WA Veterans Acts that are currently in effect. Both Acts, which were enacted decades ago, are similar. They both rely on a trust account/fund arrangement with administration of monies through a Board of Trustees established under each Act. There are penalties in place for offences, which are set at different rates in each Act, but there is no guidance in place to explain the penalty rate calculation applied. Regulations were formerly in place under each Act. Income into the Anzac Day Trust and the Relief Fund comes from various sources, and annual financial reporting is only legislated under the Anzac Day Act.

Table 1. Comparison of Western Australian Veterans Legislation

COMPARISON CRITERIA	ANZAC DAY ACT	WAASSARF ACT
Purpose of Act	To 'amend and consolidate the law relating to the observance of Anzac Day as a public holiday; to establish an Anzac Day Trust Account; and for other and incidental purposes'.	To 'establish the Western Australian Aged Sailors, Soldiers and Airmen's Relief Fund'.
Year Act established	1960	1932
Name of Trust account/fund	Referred to as the 'Anzac Day Trust Account'.	Referred to as the 'W.A. Aged Sailors, Soldiers and Airmen's Relief Fund'.
Description and sources of income for Trust/Fund	<p>The Anzac Day Trust includes monies paid to it through large racing events (horse racing, trotting and greyhound racing) and professional sporting events on Anzac Day.</p> <p>Specifically, where admission tickets are sold and each event is attended by at least 5000 persons monies are paid to the Trust pursuant to the provisions of sections 5 and 7 of the Act, and include:</p> <ul style="list-style-type: none"> ○ an amount equal to five percent of the price of a prescribed admission ticket for the event multiplied by the number of persons who attended the event; or ○ if the Minister has approved an alternative amount under 	<p>The Relief Fund includes:</p> <ul style="list-style-type: none"> ○ one-half of the net proceeds of the annual Poppy Day appeal (section 3(2B) applies); ○ other monies that may be set aside by the annual State Congress of the Returned Services League (RSLWA) for the purposes of the Act; and ○ any donations or bequests.



	<p>section 10A (2) — the alternative amount.</p> <p>The Anzac Day Trust may receive other monies from:</p> <ul style="list-style-type: none"> ○ donations, devices or bequests made to the Trust; and ○ any other monies lawfully received by, made available to, or payable to the Trust (Note: in recent years, this has included an annual appropriation by the WA Government). 	
Board of Trustees – Appointments	Four trustees are appointed by the responsible Minister and endorsed by Cabinet. Chair nominated by the Minister.	Three trustees are appointed by the WA Governor – one appointee to include the State Executive of the RSL WA. No process to identify a Chair.
Appointment tenure	3 years	Not specified in Act
Financial reporting to Government/Parliament	<i>Financial Management Act 2006</i> and the <i>Auditor General Act 2006</i> apply (section 15 of Anzac Day Act)	No provisions in Act for compliance with <i>Financial Management Act 2006</i> or the <i>Auditor General Act 2006</i>
Investment of monies in Trust Account or Fund permissible	Not specified	Yes, section 5 of the Act applies
Regulations (current or repealed)	<i>Anzac Day Act Regulations 1961</i> (repealed in 2016)	<i>WAASSARF Act Regulations 1932</i> - gazetted in 1943 (repealed in 2009)
Enforcement - penalties for offences	\$5,000	\$200

3.3 Legislative approaches in other jurisdictions

A component of this Review is a survey of similar legislation across Australian and overseas jurisdictions, which in turn informs the understanding of the approaches taken by other jurisdictions. This survey informs the Review’s understanding of the approaches taken by other jurisdictions. Issues for consideration include governance and administration, regulatory frameworks, and enforcement provisions in operation. Identifying opportunities from legislation reforms previously undertaken will also assist in formulating ideas for contemporising the WA legislation. A summary of these elements is included in Appendix 1.



4. Issues

This section presents information on several important issues currently under examination by the Department as part of this Review process.

- Preserving Anzac Day as a day of national commemoration.
- The effectiveness of income streams under the Anzac Day Act.
- Governance and administrative support to the Trusts.
- Establishing strategic principles to guide outcomes delivered under both Acts.

4.1 Preserving Anzac Day as a day of national commemoration

Section 6 of the Anzac Day Act stipulates no sporting events shall be held on Anzac Day and that no sporting event, professional or otherwise, can take place prior to 1pm on Anzac Day. Legislation in other jurisdictions impose similar constraints on the conduct of organised recreational activities. Although not articulated in the Anzac Day Act, the purpose of these constraints are to preserve the primacy of Anzac Day commemorative events by disallowing alternative activities.

Anzac Day is a gazetted public holiday across Australian jurisdictions, alongside New Year's Day, Australia Day, Good Friday, Easter Monday, Christmas and Boxing Day.¹⁰ However, Commonwealth (Cth) legislation, specifically the *Anzac Day Act 1995*, declares Anzac Day, on 25 April each year to be a day of national commemoration.

Observations:

Restrictions on organised and recreational sports in place under the Anzac Day Act remain important to show the importance of why Anzac Day is celebrated annually across WA and other Australian States and territories and NZ. A new explanatory clause in the Anzac Day Act may assist in clearly articulating and reinforcing the notion of Anzac Day as a day of national commemoration. This clause may provide context as to why organised social and sporting events are restricted before 1pm on Anzac Day.

4.2 Effectiveness of income streams under the Anzac Day Act

¹⁰ Commonwealth of Australia, 'Public Holidays List', *Public Holidays (2021)*, <https://www.australia.gov.au/public-holidays>, accessed 21 September 2022.



4.2.1 What are the legal requirements

Box 3. Income derived from racing and sporting events on Anzac Day in WA

The Anzac Day Act mandates a levy on large racing events and professional sport events held on Anzac Day to generate sources of revenue to the Anzac Day Trust. A racing club, association or body that holds an event that attracts more than 5,000 people, or a professional sporting club, association or body that conducts an event on Anzac Day with more than 5,000 people attending must within 90 days after the event:

- give to the Anzac Day Trust a written document that specifies the number of persons who attended the event and the price of a prescribed admission ticket for the event; and
- include in the document a statutory declaration
 - that is made by the person or by the secretary or treasurer of the racing club; and
 - that verifies the information in the document; and
- pay to the Anzac Day Trust
 - an amount equal to 5% of the price of a prescribed admission ticket for the event multiplied by the number of persons who attended the event; or
 - if the Minister has approved an alternative amount under section 10A(2), that alternate amount.¹¹

This last sub clause referring to section 10A(2) states:

a person may, not less than 30 days before an event is held on Anzac Day, may apply in writing to the Minister for approval of an alternative amount to be paid to the Anzac Day Trust. The alternative amount may be a fixed amount or an amount determined in accordance with a formula specified by the Minister in the notice.¹²

This provision significantly reduces the administrative workload required by these organisations, potentially resulting in increased compliance.

Limitations of the Anzac Day Act

In recent years, the Anzac Day Act has been wholly ineffective in deriving revenue from prescribed admission ticket sales from large racing events and professional sporting events. The WA Government sets aside an annual budget appropriation for the Anzac Day Trust. If

¹¹ *Anzac Day Act 1960 (WA)*, ss. 5 and 7

¹² *Anzac Day Act 1960 (WA)*, s. 10A



not for the monies received from the government, the Anzac Day Trust would not continue to fulfil its function described under the Act.

Non-adherence with the Anzac Day Act provisions regarding events held on Anzac Day began some time ago. Organisers of large racing events would not charge the price of admission for persons attending on Anzac Day, thereby avoiding the five percent levy on any gate takings required under the Act. The set obligations under the Anzac Day Act impose an administrative burden on event organisations, and the specificity of the source of revenue made it easy for these proprietors to side step the requirements of the Act.

Regardless of what may have occurred in the past, in more recent times, very few race meetings attract more than 5,000 people, rendering the sole legislated means of revenue under the Act to be ineffective. In the case of professional sporting events, the situation is somewhat different in that Anzac Day rarely falls on weekends.

Observations:

The Anzac Day Act in its current form is nominally restrictive by time and source of revenue as briefly outlined above. It is worth noting the registration of monies collected from the prescribed admission ticket sales of racing events and sporting events held on Anzac Day was a requirement under the former *Anzac Day Act 1961 Regulations*. The Regulations required lodgement of a Return to the Anzac Day Trust under regulation 6 and 7 to show the different revenue collected. The lack of visibility about the importance of the collected monies from large racing and professional sporting events held on Anzac Day reflects how the Act is not effective in achieving revenue for the Anzac Day Trust in support of community projects to bring benefits to the WA veterans' community. This signifies the Act in part, is 'not fit for purpose'.

4.2.2 Evoking the spirit of Anzac under the Anzac Day Act

In principle, any profit-making venture that evokes the spirit of Australia's Anzac tradition should contribute to the Anzac Day Trust. As an example, the Australian Football League (AFL) actively promotes the Essendon and Collingwood match each year as a commemorative match to remember past players killed in the First and Second World Wars. This game often draws the largest crowds outside of the AFL finals, sometimes drawing bigger crowds than all but the Grand Final and has on occasion, sold out in advance.¹³ Since 2000, the player of the match considered to best exemplify the Anzac spirit wins the AFL Anzac Medal. The match is played in the State of Victoria (VIC) and so, as stipulated under the *Anzac Day Act 1958* (VIC), a portion of the ticket sales are held in trust to be used for the benefit of Victorian veterans.

Since 1996, Fremantle Football Club has held the *Len Hall Tribute Game*, named in honour of WA's last Gallipoli veteran. This sporting event however, does not often fall on Anzac Day.

¹³ A. Colangelo & M. Gleeson, 'Anzac Day Clash almost sold out as AFL awaits call on crowd cap', *The Age* (21 April 2021), <https://www.theage.com.au/sport/afl/afl-awaits-public-health-team-s-call-on-anzac-day-crowd-capacity-20210421-p57176.html>, accessed 21 September 2022.



When this is the case, the Fremantle Football Club is not obligated to make a financial contribution under the Anzac Day Act.

Aside from removing the restrictive time component, broadening the revenue base might also be useful in generating income to the Anzac Day Trust. Rather than rely on gate takings at these events, imposing a levy on wagering and gaming may generate significant income to the Anzac Day Trust. Currently the Anzac Day Act does not specify wagering and gaming as a revenue source for the Anzac Day Trust. Where the nature of gaming and wagering evokes the Anzac spirit regardless of whether it occurs on Anzac Day, then a monetary amount should apply for the privilege to undertake an event of this nature, on or near Anzac Day. A hypothetical example might be a game of 'Two Up' run by a casino. It is not clear how difficult it may be to include gaming and wagering. Discussions with the Office of Racing, Gaming and Liquor within the WA Department of Local Government, Sports and Cultural Industries to scope this proposal is part of the consultation process for this Review.

Observations:

It is worth noting, expanding the scope of fundraising too far may result in competition for limited philanthropic or corporate generosity. An additional clause under the Anzac Day Act to allow a professional sporting body or racing association, with prior approval from the Minister, to provide some or all of an agreed amount to an appropriate VSP to be used for a specified purpose, may add value to the intentions of the Act in ensuring the 'Anzac spirit' is sustained.

4.3 Governance of the WA Veterans Acts

The Anzac Day Act and the WAASSARF Act have similar purposes. Both establish trusts with fund management accounts and a mechanism to fund those accounts. Despite these similarities, the Acts diverge on matters of support to the Board of Trustees, and transparency and governance arrangements. An example of inconsistency is seen through the appointments to the trusts under the Acts are different. Specifically, appointments to the Anzac Day Trust under the Anzac Day Act are by the Minister for Veterans Issues after approval by the WA Cabinet, whereas trustee appointments made under the WAASSARF Act are by the WA Governor on the recommendation of Cabinet.

As reflected in Table 1, the tenure and number of appointments in place under each Act is different. Similarly, the Minister for Veterans Issues nominates the Chair of the Anzac Day Trust under the Anzac Day Act whereas under the WAASSARF Act, there is no clear guidance on determining the Chair of the Relief Fund.

The financial management arrangements for each trust are also different. An example is the requirement under the Anzac Day Act for the Anzac Day Trust to be audited by the Office of the Auditor General, with the resulting report tabled in Parliament, while the Relief Fund arrangements under the WAASSARF Act does not include any similar provision. Although the Chair of the Relief Fund commissions an annual independent audit, there is no mechanism or



requirement to provide that report to a third party such as the WA Government or to the Australian Charities and Not for Profits Commission (ACNC).

Of equal concern, the Anzac Day Trust receives a high level of administrative support from the WA Government through JTSI, as well as an annual government budget appropriation whereas the Relief Fund and Board of Trustees receive neither government administrative support nor funding. There is no specific provision in the Anzac Day Act for investing funds held in the Anzac Day Trust. However, section 5 of the WAASSARF Act, refers to investment of monies held in the Relief Fund. Specifically, monies held in the fund are invested and accumulate with interest. There is however no reference in the Act to the manner of investment to be undertaken.

WAASSARF Act

Under the WAASSARF Act, the RSLWA is the designated authority to collect monies raised through the annual Poppy Day appeal. Where money is raised from the public by RSLWA sub branches, those sub branches are required to submit half of the money raised to the Relief Fund and are permitted to retain half, to be used for similar purposes. Where a third party raise money through the Poppy Day appeal, all money raised is owed to RSLWA.

Unlike the Anzac Day Act, the income stream to the WAASSARF delivers sufficient funds to conduct business. Under previous regulations, namely the WAASSARF Act Regulations 1943, a register of applications received from eligible persons was maintained. These regulations were repealed in 2009 and the financial reporting of monies held, dispersed and invested under the Relief Fund is not a requirement of the WAASSARF Act.

Anzac Day Act

Under the Anzac Day Act in any given year, the dollar value of community project initiatives that seek funding from the Anzac Day Trust far exceeds the funds available. This necessitates a prioritisation of grant applications received, where those applications that deliver tangible benefits to the largest number of veterans and/or their families are deemed more suitable and are generally supported by the Anzac Day Trust Board over other applications received. This assessment approach has also represented an opportunity to rationalise the number of service providers offering similar services. The net result of these prioritisation decisions has been to build a less competitive and more collaborative service environment. This stands in contrast to other jurisdictions that host environments where VSPs compete for the attention of veterans, creating a confusing service delivery environment.



Observation:

Both the Anzac Day Act and the WAASSARF Act are dated, and the governance arrangements of funds held in the trust accounts under each Act is not transparent to government nor readily accessible to the general public.

The two Acts previously had regulations, later repealed and never replaced. Regulation may outline criteria for penalties applied under the Act for any offences or non-compliance matters, and may include operational guidance that supports application processes under the Act. The adoption of any new regulations designed to support the operation of the two principal Acts, if implemented, should:

- ensure compliance and enforcement with the provisions of the legislation
- set out clear procedures for processes required to implement the Acts responsibly and effectively, to deliver specific, measurable and achievable outcomes aligned to the purpose of the legislation.

Observation:

For Relief Fund management, principles covering how money may be invested, under what criteria, and whether an application process should be in place for the dispersal of monies held in the Relief Fund under the Act would provide an overarching strategic framework that may be useful in setting long-term objectives for the management of the Relief Fund.

Observation:

A lesson to be drawn is the level of services available to the veteran community is considerably enhanced by adopting a strategic approach to the decision-making by the trustees of the respective trusts, informing the decision on who receives funding and for what purpose. The principles for prioritising one VSP's application over another are not codified anywhere, potentially leaving the grant application process open to challenge.

4.4 Developing a strategic approach

In some other jurisdictions, a strategic function is enabled by a separate body such as the Veteran Advisory Council or other similar body. An important aspect in this Review is to consider including a strategy, management oversight and advocacy functions within legislation.

The Western Australian Veterans Advisory Council (WA VAC) was established in 2014. The WA VAC provided advice and assistance to the Minister for Veterans Issues. Its original membership was extended from 10 to 15 in 2019.¹⁴ All past and the current WA Minister for Veterans Issues are veterans themselves, and therefore have lived experiences relating to the management of the Veterans Issues portfolio. This situation resulted in these Ministers

¹⁴ Minister for Veterans Issues (WA), *Minister expands membership of Veteran's Advisory Council* [media release] (19 February 2019), <https://www.mediastatements.wa.gov.au/Pages/McGowan/2019/02/Minister-expands-membership-of-Veterans-Advisory-Council.aspx>, accessed 19 September 2022.



choosing to only rarely seek the advice of the WA VAC. The original Terms of Reference established for the WA VAC did not allow direct engagement with the veteran community to effect change thereby leaving the WA VAC moribund.

An informal working group convened under guidance from the Minister's Office was formed in 2021 to consider the future of the WA VAC and as a result, the Working Group proposed that the WA VAC be disbanded. Based on the Minister for Veteran Issue's recommendation, the WA VAC and its functions were dissolved by Cabinet in November 2021.

What was apparent to the working group was the need for some form of body to fulfil several functions, these being:

- to propose strategic directions aligned to state and federal government policy initiatives relating to veterans issues
- recommend priorities for funding, including areas for potential research
- hear views and opinions from the veteran community to understand needs and concerns, and where appropriate, advocate on behalf of the veteran community to state and federal governments.

The box below outlines potential opportunities to implement strategic principles to guide both WA veterans Acts.

Box. 4 Approaches to Establish a Strategic Function

- Expand the membership of both trusts to include non-veterans. This would provide a diversification in the skills and experience in the Trustee membership.
- Establish a body separate to the Anzac Day Trust and the Relief Fund. This body would be smaller than the former WA VAC and be comprised of veterans and members with business, legal, academic or financial auditing backgrounds. Furthermore, this body could provide a level of oversight to both the Anzac Day Trust and the Relief Fund, thus building confidence with potential financial contributors to the established trusts under both Acts.
- Establish a body of identified ESO representatives and independent members appointed by the Minister for Veterans Issues. This body provides a forum for the Minister to articulate priorities or issues. This body has the advantage of direct access to the veteran community through their respective membership bases and has the potential to increase cooperation and transparency between community representatives and delivering coordinated responses to government.

Whether a strategic advisory body is established under legislation as it is for Queensland, or established outside of a legislative framework, the establishment of such a function is of interest to the final review. Regardless of the structure or its inclusion in legislation, establishing such an administrative body has the potential to:

- provide strategic guidance and priorities to the WA Government on key veterans issues.



- listen to concerns of the veteran community and where appropriate advocate to State and Federal governments
- influence ESOs and VSPs to deliver a connected, holistic and synchronised service delivery environment.
- increase funds available for the benefit of veterans and their families.
- provide a mechanism for a more robust governance structure.

5. Options for Change

Discussed briefly below and illustrated in Table 2, are several proposed approaches to enhance the WA veterans' legislation. These options address the issues identified above to varying degrees.

Option 1: No change to the WA veterans' legislation

The WAASSARF Act has benefitted from sound stewardship since its inception and continues to deliver responsive support to veterans and families under financial stress. In terms of the governance arrangements, RSLWA does maintain internal controls including bylaws and published guidance on the operation of its sub-branch activities.

While the Anzac Day Act does not deliver income to the Anzac Day Trust as intended, financial support via the WA Government allows for sufficient funding to meet the most worthwhile initiatives generated from within the local veterans' community. This is unlikely to change in the near future.

Option 2: Minor changes to both veterans Acts in WA

These minor changes include the following amendments:

- Anzac Day Act:
 - Include an explanatory clause to reinforce Anzac Day as a day of national commemoration.
 - Extend the requirement for racing and professional sporting events to pay a levy on events run on Anzac Day to include any event that promotes the spirit of Anzac on any other date.
- WAASSARF Act:
 - Change the name of the Act to modernise the language and make it gender neutral.
 - Add a provision in the Act that directs the Board of Trustees submit an annual report to the WA Government, including an audited financial statement subject to the *Financial Management Act 2006 (WA)* and the *Auditor General Act 2006 (WA)* consistent with the requirements under the Anzac Day Act.



Option 3: Major changes to both Acts

In addition to the minor amendments described above, this option proposes bolder changes to both Acts designed to maximise revenue streams to both funds, modernise and align governance requirements.

For the Anzac Day Trust, these changes might include:

- Expanding the number of trustees and include a strategic advice and ESO community advocacy function.
- Expanding sources of income to include any revenue-raising event that evokes the spirit of Anzac including wagering.
- Mandate regulation, with the regulations to include formal priorities of funding to guide the trustees.

For the Relief Fund, these changes might include:

- Increased administrative support from the WA Government including payment for services for the trustees.
- To expand the trustees to enable the inclusion of a broader array of backgrounds.
- A requirement to include an independent non-veteran trustee with a background in finance.

Option 4: Amalgamate the Acts

This option sees both the Anzac Day Act and WAASSARF Act dissolved, and replaced by a new Act that amalgamates the key functions of the current Acts. There are a number of variations possible within this option. Three of these variations are outlined below:

Option **4a** maintains two trusts managing their respective trust account / fund as they currently do. The new Act would still authorise RSLWA as the sole recipient of all funds raised through the annual Poppy Day appeal. It would align all reporting and support arrangements in one piece of legislation.

Option **4b** is as for option 4a above but formalises a new strategic advisory board in law. The options for organisation and possible functions for this board are discussed at section 4.3.1 above.

Option **4c** notes that for all intent and purposes, the WAASSARF acts as a charity. Consequently, it should operate under the Australian Government's regulatory requirements administered through the ACNC. The right for RSLWA to be the sole recipient of funds raised through the Poppy Day appeal would continue to be recognised under WA legislation but would be contingent on the Relief Fund registering, reporting, and remaining in good standing with the ACNC.

Option 5: Selected elements from the options above



Noting the options presented above are not exhaustive and that each option as presented here has strengths and weaknesses, the recommendations in this Review are likely to be a combination of elements from the options above. For instance, only minor changes to the WAASSARF Act may be appropriate but with larger changes recommended for the Anzac Day Act. Alternatively, minor changes across both Acts may be the preferred option but expanded to include the raising of a strategic guidance board. This option allows the flexibility to select from the elements above to produce a hybrid approach.



TABLE 2: SUMMARY OF OPTIONS FOR CONTEMPORISING WESTERN AUSTRALIAN VETERANS LEGISLATION

Option	Title of option	Justification for proposed option	Consequence of proposed option
1	No change to existing WA veteran's legislation	No change required as the operation of both Acts. Both Acts have been in operation for decades and have been sufficient in achieving their respective purposes.	No impact to existing trust activities. The issues detailed above will remain.
2	Minor change to both veteran's Acts in WA	<p>Minor amendments designed to address the most obvious deficiencies in both Acts.</p> <p>A modification to the Anzac Day Act to increase the likelihood of attracting funds from professional sporting and gaming bodies where those bodies appeal to the patriotism of the Australian public by invoking the 'Anzac spirit'.</p> <p style="text-align: center;">and</p> <p>A modification to the WAASSARF Act to align the collection of funds with appropriate standards of governance, and to modernise the language of this Act, including the Act's title.</p>	<p>Minimal impact with both trusts continuing to operate as usual.</p> <p>Resourcing of state government departments to:</p> <ul style="list-style-type: none"> • Ensure professional sporting bodies and racing industry are aware and comply with the Anzac Day Act, • Administer governance checks and balances required of the WAASSARF.
3	Major changes to both Acts	Major amendments designed to directly address current inadequacies in both Acts.	<p>Moderate impact on state government resourcing to maintain and administer two sets of Regulations.</p> <p>Possible increased revenue to Anzac Day Trust</p> <p>Increased reporting requirements from Relief Fund to State Government</p>



4	Amalgamate key functions of both Acts into a new single Act	<p>Key functions of both Acts are incorporated into a singular Act to clarify and harmonise administrative support and possible funding support to both trusts. A number of variations are possible under this option including:</p> <ul style="list-style-type: none">a. Maintaining separate Anzac Day Trust Account and Relief Fund and existing Trustee arrangements as currently described in Anzac Day Act and WAASSARF Act.b. The addition of a strategic advisory board.c. Responsibility for governance of WAASSARF deferred to the Australian Government.	<p>Moderate impact on state government resourcing to maintain and administer one set of Regulations.</p> <p>Under option 4b, increased administrative support for strategic guidance body.</p> <p>Under option 4c, Increased reporting requirements from the Relief Fund to Australian Government.</p>
5	Possible adoption of any key elements of options 1 to 4	<p>Any combination of important and key elements of options 1 to 4 may enhance the legislation to deliver improved veteran support services in with an intention to implement any key elements of 'fit for purpose' to the WA veterans' legislation.</p>	Unknown

6. Next Steps

Following the release of this Issues Paper, public comments received will be collated and analysed with the results used to inform the next stage of the Review process. This includes preparation of a detailed report for the Minister for Veterans Issues for his consideration. This report will include a list of recommendations highlighting opportunities for enhancement to the existing Anzac Day Act and the WAASSARF Act aligned to the ToR for the Review project.

It is likely that once a broad approach is identified, further community consultation will be required to discuss and confirm the details of any amendments.

The timing of any legislative changes is not determined at this stage. The final proposal will be presented by the Minister for Veterans Issues to Cabinet for approval to draft the proposed legislation (a draft Bill). Once the draft is completed, Cabinet approves the decision to introduce the Bill to Parliament for consultation, briefings and debate. Further details are available in the Department of Justice's guidelines and procedures¹⁵, which sets out the requirements for having legislation drafted and enacted in WA.

7. Stakeholder feedback is welcomed!

[Stakeholder feedback on this Issues Paper](#) will help inform the Department on the relevancy of the issues identified in this Paper. Your feedback also offers an opportunity to highlight to us any other issues you consider important for the WA Government to consider for ensuring the legislation is fit for purpose and meets the economic and social needs of the veterans' community in WA.

To assist you in this regard, a stakeholder feedback form is [available online](#). Submissions will be received until Friday 03 February 2023. For assistance in completing the stakeholder feedback form, please contact Defence West at veteransoffice@jtsi.wa.gov.au.

All public comments received will be analysed and a summary of the Department's response to comments received will be posted on the agency's website.

Your views are important to us, and your details if provided can remain confidential. You have the option to submit your comments anonymously; however, any submissions received are subject to the *Freedom of Information Act 1992*. This Act promotes government accountability and transparency by providing a legal framework for individuals to request access to government documents.

Thank you again for your feedback on the review of the WA veteran's legislation process. Your views are appreciated.

¹⁵ Department of Justice, 'Getting Government Legislation Drafted and Enacted – Guidelines and Procedures', *Parliamentary Counsel's Office* (Perth, 21 February 2022), <https://www.legislation.wa.gov.au/legislation/prod/filestore.nsf/FileURL/gettinggovernmentlegislationdraftedand enacted.pdf>, accessed 12 September 2022.

Appendix 1

Legislative approaches in other jurisdictions

A comparative examination of similar legislation across Australia has identified similarities and differences in Anzac Day legislation. In some cases, legislation was amended or repealed, or complementary legislation was drafted and adopted. Some jurisdictions have updated provisions of their veterans legislation to be modernised and contemporised where deemed appropriate in each of the jurisdictions. A summary of these comparable pieces of legislation follows.

1. Legislative reviews across Australian jurisdictions

- QLD

QLD undertook a review of their veterans legislation in 2020 and introduced the *Queensland Veteran's Council Act 2021* (QLD) enacted which establishes the Queensland Veterans' Council. The Queensland Veterans' Council now administers the Anzac Day Trust Fund. This replaces the administration of the Fund previously overseen by the Board of Trustees established under the current *Anzac Day Act 1995* (QLD).

- New South Wales (NSW) and VIC

NSW and VIC have also updated their respective veterans-related legislation in the last 20 years. Specifically, in 2018 NSW enacted an Act to reconstitute a Returned Soldiers League and 10 years earlier, the *Anzac Memorial (Building) Amendment Act 2010* (NSW).

In VIC, the *Veterans Act 2005* (VIC) is supported by updated Regulations – the *Veterans (Patriotic Funds) Regulations 2017*. These regulations outline the management of the patriotic funds including prescribing the classes of funds and timeframes for payments. In addition, the *Anzac Day Act 1958* (VIC) was amended in 2003 by as the *Anzac Day (Amendment) Act 2003* (VIC) to reflect new requirements under the legislation.

2. Anzac Day commemoration and restrictions applicable

There are similar statutes to the Anzac Day Act across the Australian jurisdictions including Tasmania (TAS), South Australia (SA), VIC, QLD, and Cth. Commemoration and observance requirements in NZ are under national legislation, namely the *Anzac Day Act 1966*. While NSW, the Australian Capital Territory and Northern Territory do not have specific Anzac Day legislation, there is commemoration and observance on 25 April each year as these jurisdictions operate in accordance with the *Anzac Day Act 1995* (Cth).

Anzac Day restrictions generally align under the different Anzac Day Act legislation across Australia and NZ, with restrictions on the conduct of certain activities including where applicable under each jurisdiction these restricted activities may include trading, professional sport events and racing meetings, and entertainment up to 12pm (SA), 12.30pm (TAS), 1pm (WA, VIC and NZ) or 1.30pm (QLD).

While NSW does not have a specific Anzac Day Act or other veterans legislation, restrictions on trading up until 1pm is prohibited under the *Fair Trading Act 2008* (NSW).

3. Trust arrangements, revenue and governance

There are similar trusts to the two WA Trusts established under veterans legislation in SA, QLD and VIC for providing funding to support veterans and their families. Similarly in NZ, an Anzac Day Trust Fund is established through the national *Anzac Day Act 1966*. In NSW, under the *Anzac Memorial (Building) Amendment Act 2010* (NSW), a Trust is established for protecting, restoring and maintaining Anzac memorial buildings and grounds. In TAS, the *Anzac Day Trust Winding Up Act 2020* (TAS) closes out the Fund and Trust arrangements. Former appointments of trustees and their staff were terminated. Any assets and liabilities formerly held by the former Trust were transferred to the state.

The trust arrangements in VIC are administered by different veterans legislation. Two types of trusts are in place under the *Veterans Act 2005* (VIC): namely the Victorian Veterans Fund and a large number of patriotic funds. The Victorian Veterans Fund provides access to funds that support educational and commemorative activities related to Australia's war and service history. The Victorian Veterans Fund is managed by the Victorian Veterans Council which is established under the Act appointed by the Governor in Council. The Victorian Veterans Council also administers the ANZAC Day Proceeds Fund under the *ANZAC Day Act 1958* (amended in 2003). The ANZAC Day Proceeds Fund is similar to the WA Anzac Day Trust in receiving monies from professional sporting and racing events held on Anzac Day.

In VIC, the patriotic funds were transferred to the *Veterans Act 2005* with the *Patriotic Funds Act 1958* repealed in 2006, and collectively, the patriotic fund is now managed by the Department of Consumer Affairs, Victoria. The patriotic funds' purpose is similar to the Relief Fund under the WAASSARF Act where monies raised support veterans and their families. RSL VIC offer access to and use of welfare services and clubrooms. At present, there are in excess of 600 patriotic funds in VIC administered by the RSL, branches of Legacy and the Vietnam Veterans Association of Australia (Victorian branch). The legislation allows multiple patriotic funds to be established and provides for transfer of funds between patriotic funds. This process requires approval of the Director of Consumer Affairs VIC.

Like VIC, both the states of QLD and SA have Veterans Councils established under their respective legislation to administer Trusts established for similar purposes. Both the Anzac Day Trust and the Relief Fund under WA veterans legislation comprise a Board of Trustees and not a Veterans Council.

Revenue streams into and out from the Trusts vary across Australian jurisdictions. Revenue may come from private sector/business or Government grants, from investments of monies in the funds, financial donations, gifts and proceeds from sale of property bequeathed to the specific Trust. In WA, the Anzac Day Act provisions for sourcing revenue into the Anzac Day Trust are not utilised effectively and the Western Australia Government has for many years provided an annual source of revenue to the Trust. Revenue for the Relief Fund under the WAASSARF Act principally is raised through fundraising from the annual Poppy Day appeal, held on or around Remembrance Day, the 11 November each year. Any individual or organisation that raises money is required by the Act to deliver that money to RSLWA. Where

the RSLWA sub-branches collect funds, half of the funds raised go to the Relief Fund and the RSLWA sub branch retains half for similar purposes.

The various Australian jurisdictions with trust governance in place have variable degrees of transparency. For example, the *Veterans Act 2005* (VIC) highlights records of Victorian Veterans Council meetings including validity of Council's decisions made, outlines roles and responsibilities of the Veterans Council membership, sets requirements for annual reporting (financials) of use of the two funds and payments made. The Act outlines what type of payments are required in the Veterans Fund and describes the purposes for which the Fund may be used. There is also a requirement to prepare and publish guidelines approved by the Minister regarding payments from both the Veterans Fund and Anzac Day Proceeds Fund.

Under the *ANZAC Day Commemoration Act 2005* (SA), the Act outlines applicable criteria and an application process for payments made from the Fund, and the *ANZAC Day Act 1995* (QLD) has similar arrangements in place.

4. Regulations in force

Regulations are in force in VIC and SA in support of specific veteran's legislation. In WA, the former *Anzac Day Act Regulations 1961* supported the Anzac Day Act. The regulations detailed the prescribed forms required under regulations 6 and 7 to be lodged as a 'Return' to the Anzac Day Trust, for the racing and sporting events held on Anzac Day for monies collected from prescribed admission ticket sales. These regulations were repealed in 2016. The former WAASSARF Act Regulations 1932 gazetted in 1943, supported the WAASSARF Act and included a register of applications received from eligible persons seeking payments from the fund. These regulations were repealed in 2009.

5. Enforcement provisions

There are enforcement provisions listed under several Australian jurisdictions for trading, sporting, racing and entertainment activities occurring where exemptions are not sought under the relevant Act. These include TAS, SA, QLD and VIC. For example, the *Veterans Act 2005* (VIC) sets provisions for penalties and prosecutions. In WA, penalties of \$5000 apply under the Anzac Day Act and \$200 under the WAASSARF Act for various offences in relation to conducting events not previously authorised by the Minister for Veterans Issues. In NSW, there are provisions for offences under any bylaws set by the Trust under the *Anzac Memorial (Building) Amendment Act 2010*. At the national level, there are no enforcement provisions in the *Anzac Day Act 1995* (Cth) which is similar to the *Anzac Day Act 1966* (NZ).

Abbreviations and Acronyms List

ACNC	Australian Charities and Not-for-Profit Commission – An Australian Government Agency
ADF	Australian Defence Force
Anzac Day Act	<i>Anzac Day Act 1960 (WA)</i>
Anzac Day Trust	the Trust established under section 11 of the <i>Anzac Day Act 1960 (WA)</i>
Relief Fund	the Fund established under section 3 of the <i>Western Australian Aged Sailors, Soldiers and Airmen’s Relief Fund Act 1932 (WA)</i>
Cth	Commonwealth of Australia (also known as the Australian Government)
DVA	Australian Department of Veterans’ Affairs
ESO	Ex-Service Organisation
NZ	New Zealand
NSW	State of New South Wales
QLD	State of Queensland
RSLWA	Returned Services League - Western Australian Branch
SA	State of South Australia
TAS	State of Tasmania
ToR	Terms of Reference
VIC	State of Victoria
Strategy	Western Australian Veterans and Families Strategy 2019
VSP	Veteran Service Provider
WA	State of Western Australia
WA VAC	Western Australian Veterans Advisory Council
WAASSARF Act	<i>Western Australian Aged Soldiers, Sailors and Airmen’s Relief Fund Act 1932 (WA)</i>

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