



**Police Federation
of Australia**
The National Voice of Policing

SUBMISSION to the

Director
Superannuation Insurance and Governance Unit
Member Outcomes and Governance Branch
Retirement, Advice and Investment Division
The Treasury

via - superannuationobjective@treasury.gov.au

Legislating the objective of superannuation

The Police Federation of Australia (PFA) is the national body representing the professional and industrial interests of Australia's in excess of 65,000 police officers, across all state, territory, and the federal police jurisdictions.

Membership as at: 31 December 2022	
Police Association of South Australia	4,703
Western Australia Police Union of Workers	6,880
Queensland Police Union of Employees	12,177
The Police Association of Victoria	17,424
Police Association of NSW	17,020
Police Association of Tasmania	1,415
Northern Territory Police Association	1,628
Australian Federal Police Association	4,040
Police Federation of Australia	65,287

I write this submission in support of the submission of The Police Association of Victoria.

The PFA has written numerous submissions and appeared before inquires over the past two decades in relation to superannuation issues and in particular preservation age as it applies to police. We have constantly raised concerns about allowing police officers to retire with dignity after many years of dedicated service to the Australian community. Forcing officers to continue working past 55 to reach their preservation age often takes away that dignity.

Every community expects and needs to be provided with a dedicated police service. Such dedicated police services, allow for trusting relationships to be formed, for a consistent policing approach to law and order issues to be taken, and provides community stability in which business and other government agencies and services can be safely provided.

The police are one of the fundamental pillars of a free and safe democracy. However, policing is a physically and morally dangerous occupation in which practitioners deal constantly with complex, and often ambiguous, problems. Policing requires high levels of judgment, discretion, dispute resolution, problem solving, and physical and moral courage.

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.
2. The oath also 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.

One of the major impacts of years of policing service is on ones' mental health and wellbeing.

Over the past several years the PFA has also made submissions to number of inquiries into mental health/suicide. They include the 2018 Senate Education and Employment's inquiry into the role of Commonwealth, State and Territory Governments in addressing the high rates of mental health conditions experienced by first responders, emergency service workers and volunteers, as well as providing oral evidence to that Committee, two submissions to the Productivity Commission's Inquiry into Mental Health as well as to the 2021 Select Committee on Mental Health and Suicide Prevention.

In those submissions and evidence, we spoke about what the 'oath' imposes on an officer as well as highlighting the various research that had been undertaken both in Australia and overseas that identified the significant physical and psychological toll police work has on officers. We also raised in all those submissions the issue of the impact of the workers compensation process on police.

The key, well recognised and accepted stressors within the police workplace that have a significant impact on their health and wellbeing, particularly after a lengthy police career include:

- consistent exposure to trauma,
- inadequate staffing levels and a lack of resources,

- police are the last agency of resort (e.g., transport of prisoners and guarding and transport of mental health patients),
- hypervigilance,
- fear of reporting mental health injuries to the system,
- bureaucratic management styles,
- perceived lack of leadership,
- perceived lack of support from politicians & senior management,
- perceived unfair decision-making by managers,
- the accountability applied to police officers including a 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
 - damned if you do, damned if you don't,
- instant information, whether it's factual or not,
 - constant news cycle,
- priorities constantly shifting and dictated by 'flavour 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
 - on one hand police are costing too much but on the other hand expected to do more with less,
- shift work.

The 2020 Productivity Commission's Inquiry into Mental Health, indicated 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 stated that, *"...occupations with the most work-related mental health claims have been police, fire fighters and defence force members (9% of all serious claims)..."*

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. A perusal of The Police Association of Victoria's submission to this inquiry strongly supports that claim.

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 and research 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. Forcing officers to continue on in their later years only exacerbates their mental health issues.

The PFA together with its' Branches across the country have embarked on a number of projects in an endeavour to assist with the mental health and well-being of its members and to support a healthy work life balance.

These include –

- A national awareness campaign on police officer mental wellbeing, which has developed a 'one stop shop' web portal for police and their families aimed at educating and building the resilience of police officers in the areas of social, emotional and psychological health associated with policing;

- The conduct of a flexible working arrangements survey focused on the work life balance of officers targeting working arrangements to assist with officers' stress, burnout and increasing fatigue at work;
- Working with a provider for the implementation of appropriate Return to Work processes, or where an officer cannot return to their policing career, including Career Transition provisions to assist them out of policing and into a future career that is rewarding and recognises the skills they have gained throughout their policing career; and
- A national independent service provider network, the 'BlueHub', where a centre of excellence is being developed to support satellite 'BlueHub' locations aimed at providing best practice assessment and treatment for injured officers.

All of the above, points to our concerns about forcing police officers to work in such a demanding profession when they feel that they can no longer meet the requirements of policing.

When the Superannuation Industry Supervisions Act was passed in 1993 it contained specific provisions in "Part 29 – Exemptions and Modifications", which gave powers of exemption to the Modifiable Provisions. This was because the Parliament at the time understood that a 'one size fits all' arrangement for superannuation might not suit all sectors in the long term.

It is for these reasons we implore the government to support the recommendations of the Police Association of Victoria's submission and allow police to access their superannuation entitlements from age 55 as opposed to the current 60.

I would be happy to appear before the Committee to expand on any aspects of this submission.

Sincerely yours,



Scott Weber APM
Chief Executive Officer

31 March 2023