



Australian Government  
Department of Veterans' Affairs

# Senate Inquiry - Issues relating to advocacy services for veterans accessing compensation and income support

**DVA Submission to the Senate  
Foreign Affairs, Defence and Trade  
Legislation Committee Inquiry –  
May 2025**

## **Compensation and income support for veterans**

On 13 February 2025, the Senate referred an inquiry into Compensation and income support for veterans to the Foreign Affairs, Defence and Trade Reference Committee for inquiry and report by **5 August 2025**.

### **Terms of Reference**

The representation of and advice provided by ex-service organisations, commercial entities, not-for-profits and individuals to veterans and families in relation to accessing compensation and income support from the Department of Veterans' Affairs, with particular reference to:

- (a) the appropriateness of commercial entities, within and outside Australia, providing advocacy services, including the charging of fees or commissions on statutory entitlement payments;
- (b) representation of veterans at the Veterans' Review Board, including by legal practitioners;
- (c) regulation, training and professional discipline arrangements for advocates;
- (d) the consideration of previous reviews undertaken into the advocacy model, including recommendations made and subsequent implementation or lack thereof; and,
- (e) any related matters.

The Department of Veterans' Affairs (DVA) welcomes the opportunity to provide this submission to the Senate Foreign Affairs, Defence and Trade Legislation Committee (the Committee), as part of the Committee's inquiry into compensation and income support for veterans.

Veterans' advocacy plays a critical role in ensuring veterans and families who require it receive informed, accurate and timely advice in their engagement with DVA. Veterans' advocacy services generally fall into two categories:

- 1) Compensation advocates, who assist with:
  - lodging claims for compensation or other assistance with DVA, and
  - seeking review of DVA's decisions through relevant tribunals or other processes.
- 2) Welfare advocates, who assist veterans and their families to access a wide range of DVA, other government, and community services to support their welfare and wellbeing.

DVA notes that most concerns raised with it in relation to the conduct of advocates relate to compensation advocates. In 2023-24, 46% of all Initial Liability and Permanent Impairment claims under the *Military Rehabilitation and Compensation Act 2004* (MRCA) were lodged by an advocate or representative. In 2024-25, as of 30 April, this percentage has grown to 52%.

Advocacy services are provided by a range of individuals either on a free-to-the-veteran (whether or not advocates are remunerated) or fee-for-service basis. Advocates are not currently regulated, and professional oversight of work standards and conduct is limited. This lack of oversight has had a negative impact on the quality of advocacy services and has contributed to poor advocate behaviour and veteran outcomes.

Following the provision of significant additional resourcing by the Government in response to the recommendations of the Royal Commission into Defence and Veteran Suicide, DVA has made significant improvements to the timeliness of its claims decision making. Compared to 2021-22 (the last full year before the Interim Report of the Royal Commission), DVA has increased determinations from 53,508 to 100,697 (an increase of 88.1%). Over the same period claims have risen by 35.8% and the average complexity of claims (i.e. number of conditions per claim) has increased from 2.6 conditions per claim to nearly 5. Unfortunately, this increase in DVA's processing capacity has to some extent, encouraged the development of advocacy business models and behaviours of concern. Some of these behaviours include:

- lodging claims for excessive numbers of conditions
- withdrawing claims following natural justice indications of a likely refusal (but after testing and report writing has occurred and been paid for)
- development of vertically integrated corporate structures including advocates and medical professionals
- sensitive personal data (including from serving members of the Australian Defence Force) being accessed or worked on from offshore
- charging of very significant commission-based fees, and

- aggressive behaviour towards DVA staff.

While DVA does not assert that any of these activities are necessarily illegal, they do raise concerns in relation to program integrity and overall cost, an influx of unmeritorious claims clogging processing systems, and impacts on long-term veteran wellbeing.

DVA has been active, as part of its ongoing program integrity efforts, in addressing these behaviours to ensure ongoing program integrity. It has worked with Ex-Service Organisations (ESO) and other external stakeholders to develop a range of measures to enhance the quality of advocacy services and mitigate irregular practices in the advocacy sector. Key amongst these has been the creation of the Institute for Veterans' Advocacy as a professional organisation for veteran advocates (both compensation and welfare).

DVA provided evidence to the Royal Commission in relation to potential enhancements to the quality and capacity of veteran advocates, and notes Recommendation 99 of the Royal Commission's final report which directly addresses issues relevant to the Committee's inquiry. That Recommendation was accepted in principle by the Government in its Response in December 2024.

In addition to process improvements and expanded processing capacity, DVA continues to improve its service delivery model to ensure veterans and their families can access the supports to which they are entitled as efficiently and easily as possible. The simplification of the current 'tri-Act' legislative framework for entitlements contained in the *Veterans' Entitlements, Treatment and Support (Simplification and Harmonisation) Act 2025* (the VETS Act) is central to this effort.

DVA is committed to making the claims process as fast as possible for the entire veteran community. Veterans are able to lodge claims without the need of advocates and can do so in the manner that best suits them, including through our online claiming system MyService, by email or in person in one of our Veterans' Access Network (VAN) offices. To assist us in this and ensure the fastest processing time for veterans, DVA has asked advocates to ensure that all claims and lodged through MyOrg and MyService.

DVA recognises that some veterans and families will engage with it without needing the support and advice of an advocate and remains respectful of individual decisions to engage an advocate. It also recognises veterans and families may seek the assistance of free-to-the-veteran advocacy services provided by ESOs, or to choose to engage fee-for-service advocates including legal advisers and other professions as appropriate.

Without seeking to limit those choices, DVA notes a range of opportunities exist to ensure properly trained advocates are available without charge to veterans including to ensure vulnerable veterans are not exploited or subjected to very significant commission-based fees on their statutory entitlements, or subjected to processes by service providers that raise unacceptable national security and/or privacy risks.

At the outset, DVA notes that claims are prioritised and assessed based solely on vulnerability, eligibility and legislated processes. The use or not of an advocate, and the



nature of any advocate used, has no bearing whatsoever on decision making pathways or timelines.

**(a) the appropriateness of commercial entities, within and outside Australia, providing advocacy services, including the charging of fees or commissions on statutory entitlement payments;**

Veterans' advocacy services have traditionally been delivered by a mix of paid and volunteer ESO advocates who deliver free-to-the-veteran services under their sponsoring ESO. For successive governments the cost of providing these services has in part been subsidised by grant funding, including through the provision of training, and via the Building Excellence in Support and Training (BEST) grants program, which contributes to the salary and other costs incurred by ESOs who employ advocates.

DVA notes the development of a growing commercial advocacy sector which charges a fee to assist veterans with their DVA compensation claims. This sector has a range of fee schedules, corporate structures and service offerings. However, DVA is becoming increasingly concerned by aggressive and irregular behaviour within this sector.

Some of the poor behaviour identified within this sector includes:

- organised corporate structures and associated entities operating to maximise corporate revenue from testing and reporting writing by exploiting DVA processes
- instances of 'how to' guides on social media designed to manipulate diagnoses and test results, or claims patterns, to maximise financial outcomes
- connection between corporate entities and individuals involved in irregular behaviours spanning claims lodgement to service provision
- changing business names and/or modifying business structures to make it difficult for DVA to identify and link entities where irregular behaviour is detected and responded to by DVA, and
- aggressive data harvesting and mining, and marketing campaigns targeting veterans by fee-for-service advocacy entities.

*Lack of regulation or professional oversight*

There is currently no sector wide regulation, oversight, or accreditation within the veteran advocacy sector. This is at odds with many other professional sectors (e.g. migration or tax agents).

Based on recent consultation DVA conducted with the ex-service community regarding the establishment of a professional body for veterans' advocacy, there appears to be an emerging acceptance that the commercial advocacy sector has a role to play, provided they have appropriate professional and ethical oversight. DVA notes members of the legal and financial services professions practising in the advocacy sector are already governed by relevant regulatory and professional standards schemes.

DVA also notes that inappropriate behaviour is not limited to commercial providers, particularly in relation to engagement with DVA staff.

DVA notes there are some ESOs who remain opposed to allowing fee for service providers to operate, including some proposing that legislation should be established to prohibit or limit such practices. Based on DVA's consultation this opposition arises predominantly from the lack of regulation which permits anyone, regardless of their qualifications, integrity or ethical standards to operate as a veteran advocate. It was also raised that there is a lack of oversight or accountability, and it has been reported that some businesses charge up to 29% of any lump sum payment.

DVA's focus is on improving training, availability, performance monitoring, and standards of behaviour of advocates regardless of their status, and supporting the availability of advocates providing free-to-the-veteran services.

#### *Commission based fee schedules*

Of particular concern is the prevalence of fee schedules based on a percentage of the veterans' compensation (commission-based fees), misleading advertising targeting potentially vulnerable veterans, and business models designed to manipulate and exploit the claims process to maximise corporate profits. DVA is aware of percentage commission rates as high as 29% of the veteran's statutory compensation payment.

A consistent sentiment expressed to DVA by the veteran community is that commission-based fee structures are problematic, and that Government should protect veterans and their compensation from potentially predatory practices.

There is a long tradition reflected to varying degrees in veterans' legislation, recognising the inalienability right of veteran compensation payments. For example, the MRCA, which will be the future single ongoing act for veterans' entitlements, evinces an intention to protect the unchallengeable status of some compensation payments by preventing them from being made into an account held by a third party such as a solicitor or advocate, even if the person entitled to the compensation has directed that the compensation be paid to a third party.

The practice of setting a fee in reference to the quantum of compensation achieved is contrary to this intention and could encourage concerning behaviours amongst advocates.

In addition, advocates that seek to take a proportion of a veteran's lump sum compensation as payment of fees (commission-based fees) may be motivated to submit a higher number of claims, including what DVA consider to be low-quality claims which lack the basic information required to commence an investigation. For example, DVA is seeing a growing practice of reviewing Service Medical Records and claiming historic, resolved injuries, which no longer require treatment and may not be compensable.

DVA is legally obligated to investigate and determine all validly lodged claims, even where they are poor quality and/or lack key documentation or detail. As such, low-quality claims clog up the claims processing system, divert resources from other legitimate claim investigations, increase overall claim processing times, and adversely affect veterans with legitimate claims. DVA has identified less than 20 providers accounting for around 3% of claims received in 2023-24 who had not been engaged in the claims process at a material level in the preceding year.

### *Abnormal medical report practices*

DVA is concerned by the potential for vertically integrated business models, or other corporate models to increase the likelihood of 'gaming' or collusion to occur in order to obtain profit maximisation through report writing and other referrals, including for unmeritorious claims.

Possible techniques could include:

- providing claims and medical reports related to any condition the veteran may have experienced, regardless of whether there is a possible connection to service or whether the condition has resolved and may not be compensable
- providing unrequested medical reports or conducting unnecessary medical investigations and charging these to DVA
- contending a service-connection, no matter how unlikely, and/or
- over-estimating or maximising impairment levels.

Entities may also charge high rates for their services or seek to maximise payment through volume of reports provided.

These have the potential to create ambit claims and unnecessarily increase claim volumes and DVA staff workloads.

This practice also carries additional risk to veteran wellbeing. Unnecessary medical assessment and investigations increases anxiety, exposes veterans to radiation and other procedural risks associated with testing, and often results in the need for additional investigation to address false positives and incidental findings. In addition, the over-diagnosis of minor and incidental findings in combination with the perverse incentives to overstate impairment, can lead veterans to believe they are more unwell than they are. These medical practices focus on illness and compensation rather than health and wellbeing.

### *Offshore advocacy providers*

DVA is aware of commercial advocacy providers who operate from overseas premises. This corporate structure poses potential challenges for the Australian Government to act where illegal conduct is identified, such as breaches of relevant Australian laws, including in relation to privacy and data security.

In addition, DVA clients provide sensitive personal information to their advocates and in some instances to obtain assistance from DVA, they may disclose sensitive information about Australian military engagements to their advocates, particularly those DVA claimants that are still in service or have only recently transitioned out of the ADF.

Supporting personal information being retained in Australia, on Australian servers, is consistent with the Data and Digital Government Strategy which seeks to ensure that there are robust privacy and security settings in the delivery of Government services:  
<https://www.dataanddigital.gov.au/strategy/missions/trusted-and-secure>.

### *Advertising and communication standards*

Concerns have also been raised about advertising conduct within the commercial advocacy sector, with some providers using misleading marketing tactics, such as:

- implied guaranteed financial outcomes
- setting expectations for six figure payouts
- promoting their past performance of financial outcomes as an indicator of what a veteran will achieve
- advocating that DVA is adversarial, and
- promoting the DVA claim system as complex and unable to be navigated successfully by individuals, instilling uncertainty that a veteran won't get their full compensation entitlements without using a fee for service advocate.

Some veterans have reported negative experiences with these businesses such as unrealised expectations, excessive fees and poor ethical behaviour.

DVA has also observed – including through complaints lodged by veterans – instances of lotteries or competitions aimed specifically at veterans. It is then reported that the veteran's information that is supplied through the competition entry process is being used for purposes outside of the lottery. Veterans raise concerns that they are subsequently receiving unsolicited contact by providers offering services which can be funded by DVA.

### **(b) representation of veterans at the Veterans' Review Board, including by legal practitioners;**

The Veterans' Review Board (VRB) is part of a three-tiered external review system comprising of merits review before the VRB and the Administrative Review Tribunal, followed by judicial review by the federal court system. The legislative framework governing the operation of the VRB was introduced in 1984 by the *Repatriation Legislation Amendment Act 1984*. The prohibition on legal representation found in section 147 of the *Veterans' Entitlements Act 1986* is a longstanding feature of these arrangements which has been historically supported by ex-service groups. The provisions reflect the fact that the VRB is intended to be a low cost, non-adversarial merits review process, with neither the applicant nor the Commissions represented at hearings by a legal practitioner. The VRB also has a strong emphasis on alternative dispute resolution. A veteran may be represented by a person other than a legal practitioner before the Board, such as an accredited compensation advocate.

DVA is aware that some concerns have been raised about the provisions preventing representation by a legal practitioner. The removal of the prohibition on legal representation at hearing of the VRB is viewed by DVA as contrary to the veteran-friendly, non-adversarial nature of the VRB. It is worth noting, legally qualified people are not prevented from assisting veterans in the preparation of submissions or are they prohibited from attending a hearing. They are only prohibited from representing the veteran at hearings before the Board. The prevention of legal representation at the VRB also applies to

the Commission (and, by corollary, to DVA). DVA will only attend a board hearing if invited by the Board to provide advice, usually of a technical nature.

Veterans are able to progress cases to the Administrative Reviews Tribunal, with legal representation, after the VRB.

DVA notes its spending on legal fees in ART and related court proceedings was \$2.85 million in 2023-24, and \$2.82 million in 2024-25 (as of 30 April).

**(c) regulation, training and professional discipline arrangements for advocates;**

Veterans' advocacy is not regulated by a legislative scheme or governed by any overarching entity or standards. These factors have an impact on the quality of advocacy services provided to veterans and families and have the potential to lead to poor outcomes, including veterans' relying on poor advice or becoming victims to predatory and unscrupulous behaviour.

The Advocacy Training and Development Program (ATDP) offers nationally accredited training in military advocacy and support, through partnering with Registered Training Organisation Major Training Services P/L (RTO90748). It ensures that advocates meet national standards before they give advice to the veteran community. ATDP is available to support ESOs who provide free advocacy services to the veteran community. It is a partnership between ATDP and ESOs.

*The Institute of Veterans Advocacy*

In 2024, DVA convened a working group with representatives of DVA's Ex-Service Organisations Roundtable (ESORT) to consider how to strengthen advocacy ethical and professional standards and put in place a layer of professional oversight. This working group developed a proposal to establish a new independent professional association for veteran advocates – the Institute of Veterans Advocacy (the Institute). DVA conducted public consultation on this proposal from August 2024 to October 2024. The proposal received broad support through this consultation process.

The Institute has since been established by the ex-service community to be the national professional association for veterans' advocates. Membership will be open to all advocates (free-to-the-veteran or fee-for-service) provided they complete the necessary training, agree to and abide by the code of conduct.

The Institute is governed by an independent board of directors that were endorsed by ESORT. Institute Directors do not receive sitting fees or other remuneration and DVA understands that it is intended the current board will sit for two years to establish the Institute, after which a new Board election process will be undertaken to ensure the Board is representative of the ex-service and advocacy community. The Institute has been established as a not-for-profit company limited by guarantee and is completely independent of DVA. However, DVA will work closely with it and its members on matters relating to the future accreditation and training of Institute members.

The Institute will set standards, provide leadership and support to veterans' advocates.



Functions of the Institute include:

- establishing competency standards, a code of ethics and minimum training requirements for veteran advocates
- accrediting veteran advocacy service providers, and monitor compliance with continuing professional development
- providing members with access to a range of benefits and tools, including improved and nationally consistent training and professional development through DVA administered courses, and
- establishing a nationally consistent complaints handling process

Through these activities it is expected the Institute will:

- lift the overall standard of advocacy services nationally
- improve confidence in the veteran community and provide assurance to veterans and their families that services provided from an accredited veterans' advocate are professional, high quality and are provisioned with a contemporary understanding of veteran entitlements, and
- professionalise veteran advocacy services and enhance the standing and recognition of veteran advocates and advocacy services in the community.

Membership eligibility for the Institute will be dependent on completion of relevant Advocate Training and Development Program (ATDP) courses which provides nationally consistent training in military advocacy, or recognition by the Institute of equivalent professional qualifications. Recognition of Prior Learning would be available for current advocates.

Compensation and wellbeing advocates will be expected to complete relevant ATDP courses which canvass DVA processes and systems and the unique nature of military service regardless of their professional qualifications.

Working with DVA design a new Advocacy Training and Development Program will form part of the Institute's priorities.

DVA supports the Institute as the appropriate oversight body for the advocacy sector and believes the Institute will strengthen and enhance service standards for veterans' advocacy. This will provide veterans and families using services from an Institute accredited member with the assurance of the advocate's credentials and professional standing, increasing confidence in the services provided.

Australia's ex-service community has a long and proud history of assisting current and former members of the Australian Defence Force, including to access their entitlements through the various repatriation schemes. It is this legacy of trust that led to the prominence of ESO advocates. DVA is of the view professional oversight and accreditation is most appropriately delivered by an organisation independent of DVA, ideally one which has the confidence of the ex-service community. In saying this, noting the Institute is not for profit, and much of its membership base will be volunteer advocates working for not-for-profit organisations, meaning the financial viability of the Institute is something that

may need to be considered by future Governments. DVA is not currently able to contribute to the funding of the Institute.

The Institute's ability to uphold relevant standards will rely on incentive and reputation factors e.g. advocates will need consider Institute membership and accreditation valuable/desirable for the Institute to be able to govern their standards. Under this model advocates and providers may choose not to seek membership and still provide veterans advocacy services (without accreditation). In these instances, other than warning the veteran community on the potential risk of using a non-accredited advocate, the Institute would have no power to sanction or limit those providers.

**(d) the consideration of previous reviews undertaken into the advocacy model, including recommendations made and subsequent implementation or lack thereof; and,**

DVA is committed to ensuring high quality support is available for Australian veterans and families when they need it. Veterans' advocacy can play an important role in ensuring veterans and families receive informed, accurate and timely advice.

Improving compensation advocacy was identified by the *Royal Commission into Defence and Veteran Suicide Final Report* recommendation 99:

**Recommendation 99: Improve compensation advocacy by funding professional, paid advocates**

The Australian Government should replace the Building Excellence in Support and Training (BEST) grant program with an ongoing, demand-driven funding program for professional, paid veteran compensation advocates. At a minimum, the amount of funding should be increased to provide compensation advocacy for:

- (a) all veterans who need support to submit a liability and/or compensation claim with the Department of Veterans' Affairs
- (b) all veterans seeking an internal or external review of a claims decision.

Funding allocations should be for a minimum of three years to provide employment stability. They should be designed to ensure equitable geographic service coverage and meet the diverse demographic needs of the veteran population, including female veterans and LGBTIQ+ veterans.

The Government response agreed-in-principle to improving compensation and wellbeing advocacy, including funding compensation advocacy services that are provided at no cost to veterans.

As part of its response, the Government established a Commonwealth-led implementation taskforce within the Department of the Prime Minister and Cabinet. The Taskforce draws on expertise from across government to the Government response achieves meaningful outcomes for members of the Defence and veteran community and their families. DVA is working closely with the PM&C Taskforce and Defence on the implementation of the Government response, particularly those recommendations agreed-in-principle or noted by

Government. This will inform considered advice co-ordinated by the PM&C Taskforce for Government on options for implementation and sequencing.

### *Building Excellence in Support and Training Grants (BEST) Program*

The BEST Grants Program aims to support the work of ESOs in providing advocacy services to the veteran and Defence communities.

The objectives of the BEST program are to assist ESOs to:

- improve the quality of claims received by DVA at the primary determining level
- reduce the rate of appeals to the Veterans' Review Board (VRB) and the Administrative Review Tribunal (ART) (formerly the Administrative Appeals Tribunal (AAT)), and
- promote the provision of wellbeing services to the veteran and defence community.

The intended outcomes of the program are to ensure:

- the veteran and defence communities are able to benefit from having better informed ESO advocates who can ensure claims lodged with DVA are of a high standard and contain all required information to enable timely and quality decisions
- ESO advocates will assist in improving claims assessment efficiency, and
- the veteran and defence communities will have access to appropriate compensation and wellbeing advocacy services.

The BEST Program is offered as an annual, demand driven grant program with one funding round each financial year. Funding is allocated based on a funding formula that has been developed by DVA in conjunction with the Ex-Service Organisation Round Table (ESORT).

Restructuring the BEST program to include multi-year agreements has been proposed previously, and more recently proposed by the Royal Commission into Defence and Veteran Suicide. The annual nature of the grant funding creates an artificially short horizon for ESOs. A number of ESOs rely on BEST funding as a regular part of their revenue stream. Moving to multi-year funding would enable ESOs to recruit and retain appropriately skilled advocates on a longer-term basis.

Total funding offered through the BEST Program in 2025-26 is \$4.818 million. While the quantum of BEST Program funding has not increased (other than for indexation) since 2005, the amount of funding sought by ESOs is continuing to increase.

With consideration to previous recommendations and the Royal Commission's Recommendation 99, any changes in BEST Program funding should be aligned with consideration of broader program reform.

### Previous review recommendations

Advocacy services have been subject to several reviews and recommendations, including *The Veterans' Advocacy and Support Services Scoping Study (Cornall Review, 2018)*, The

Productivity Commission's report - *A Better Way to Support Veterans (Productivity Commission (PC) Report, 2019)*, and the UNSW Social Policy Research Centre report (*UNSW report*). These reviews identified several issues including the declining numbers of ESO advocates available to provide free services, as well as a lack of diversity in the advocate cohort and changing veteran needs.

#### *The Cornall Review - 2018*

The Cornall Review envisaged a complete re-making of the advocacy and training framework and made a raft of recommendations including—

- DVA setting up a help desk for veterans' advocates, claims advisors and support workers to have direct access to departmental delegates who can answer technical questions.
- Sweeping changes to the advocacy training system, including establishing an independent body to accredit professional advocates
- That the Australian Government establish, fund and promote a free Veterans' National Legal Service and a Veterans' National Legal Helpline, and
- An independent body to plan, implement and deliver a consolidated, coordinated approach to the national delivery of veterans' advocacy and support services resulting in a modern professional sustainable advocacy service.

The review also supported the retention of the statutory prohibition on legal practitioners and persons holding a legal qualification representing veterans at hearings before the Veterans' Review Board.

#### *The Productivity Commission Report - 2019*

The Productivity Commission highlighted the problems associated with the current funding model for claims advocacy, recommending that DVA should fund professional claims advocacy services in areas where it identifies unmet need. The PC also recommended that services should be delivered through ex-service and other organisations in a contestable manner like the National Disability Insurance Scheme Appeals Program and the National Disability Advocacy Program, and that DVA should take a more active role in the stewardship of these services.

Like the Cornall report, the PC report also recommended that DVA help with primary claims and that claims advocacy assistance from veterans' organisations should remain available to any veteran who seeks it, but the needs and expectations of younger veterans require a stronger focus on wellbeing supports from veterans' organisations.

#### *UNSW report - 2021*

In 2021 DVA commissioned the UNSW Social Policy Research Centre to look at the capacity of the veterans' advocacy workforce, both now and into the future. The project's aim was to find out what may happen to the advocate workforce over the next few years, with the

information used to inform possible changes to the veterans' advocacy system, including the support offered to ESOs and advocates by DVA.

The results of the study were based on 593 advocates and 58 ESOs who responded to a voluntary survey. The findings of the study contained insights into advocates and ESOs, including information on the age and working lives of advocates and the longevity of the service expected to be provided by advocates and ESOs into the future.

While heavily caveated, the report found advocates will be needed for the foreseeable future, that the system at that time was under considerable pressure, and that there will need to be significant changes for the system to remain sustainable over the medium and longer term.

### Addressing previous findings

Previous findings have been used to inform the work of DVA, including working with the ex-service community to establish the Institute as the professional body for advocates, the Claims Lodgement Support Program and providing new ways to share information and develop training approaches between ESOs and DVA claims processing staff.

Similarly, the ATDP has also considered the structure and duration of their course content as recommended in the Cornall Review and have implemented a number of program updates to assist advocate learning. These include access to learning materials used by DVA delegates and changes to entry level training and other course requirements, such as mentoring and external assessment.

There have been significant changes to DVA's claims processing, ICT and policy/legislative environments since the release of these reports that in part address some of the concerns raised.

DVA's face to face services have also evolved over time Veterans' and Families' Hubs delivering integrated support and advocacy services, the Veteran Access Network that provides a first point of contact for veterans and families to provide advice and access to services and support. DVA also have Veteran Support Officers located on Defence bases to provide personalised support and education to serving members and their families about their eligibility for DVA benefits and entitlements.

### **DVA initiatives**

There have been significant changes to DVA's processing, ICT, and policy/legislative environments which go some way to addressing some of the findings and recommendations of these reports. These include:

- implementing the *Veterans' Entitlements, Treatment and Support (Simplification and Harmonisation) Act 2025* to harmonise the veteran entitlements system under one Act
- establishment of the Institute (see information under part C of this submission).



- improvements to MyService to make claiming simpler for veterans, combined with a significant increase in the number of veterans using MyService to lodge their own claims
- introduction of simplified/streamlined investigation processes for particular claim types, and
- changes within the claims processing environment, including triaging processes, the introduction of claims support and claims lodgement assistants and improved outreach services.

#### *Claims Lodgement Assistance Program*

This program involves DVA staff who are experienced in claims processing, directly assisting veterans and ESO advocates to lodge claims with DVA.

This pilot was first trialled in Western Australia in 2024 and is now available on request across Australia.

The Program is available to ESOs across Australia and currently operates in five locations. DVA is working with the ESO community to continue to expand the Program nationally. Data indicates claims lodged through this process compared to claims lodged through conventional means are being processed in a shorter time.

In addition, the DVA Veteran Support Officer network, established on 53 Defence Force bases covering each state and territory is equipped to deliver claims lodgement assistance to all serving members, including transitioning members.

#### *Advocate and Delegate information sharing sessions*

DVA has partnered with Returned Service League (RSL) Queensland to facilitate advocate and delegate information sharing sessions in Brisbane, Townsville, Sydney, Hobart and Currumbin.

These sessions have enabled DVA claims staff to engage with advocates from a variety of ESOs to discuss a range of topics such as:

- an overview of the compensation claims process
- the role of claims support officers (CSOs)
- Incapacity Payments and Special Rate Disability Pensions, and
- understanding MRCA Permanent Impairment calculations.

The feedback from these sessions was positive, with consideration underway for future options to build on working collaboratively with experienced accredited advocates.

#### *Advocacy Training and Development Program (ATDP)*

The Course in Military Advocacy (CiMA) administered by DVA through the ATDP, delivers training in Australian Skills Quality Authority (ASQA) advocacy qualifications. It is acknowledged that the current structure of the CiMA requires significant direct mentoring by a trainee's ESO, placing pressure on the experienced mentoring advocates as the number of trainees outweighs the availability of mentors.

To address this a combined wellbeing and compensation entry-level course was rolled out in 2024 removing the requirement to complete a Workplace Experience Log (WEL) under the guidance of a workplace mentor.

The new Level 1 pathway reduces the pressure on workplace mentors who have advocate caseloads of their own. It also eliminates the need to wait for various claim types to be lodged to sign them off in the WEL. Practical experience is instead comprised of simulated scenarios, enabling trainees to complete Level 1 in a shorter time, with less ESO resources.

Level 1 qualified advocates continue to work under supervision, as they did in the original course offering.

DVA is engaging with the Institute of Veterans Advocacy to identify opportunities for further reform and ensure future ATDP courses meet the needs of veteran advocates.

**(e) any related matters.**

*Inadequate IT systems*

DVA's current IT functionality does not adequately support the end-to-end advocate claims and reviews process. There are several limitations within our existing IT systems, including the outdated existing advocate online claim lodgement channel – the ESO portal and a lack of functionality in DVA's preferred online claim channel - MyService.

MyService was designed to improve access for a veteran or family member to submit claims but does not take in account advocate access for those that choose to use advocacy services.

DVA's preference is that advocates can lodge claims electronically via MyService. This would streamline claims lodgement and processing, improve the quality of claims lodged with DVA (by virtue of the frontloading of information facilitated through MyService), and enable advocates and their organisations greater governance and control over the claims they are lodging. Limitations in MyService mean that this option is not viable for most organisations and advocates.

Future investment in MyService and other relevant IT systems to ensure they meet the needs of advocates, and their relevant organisations will improve advocacy services and lead to more efficient claims processing and better veteran outcomes.