



**Australian Veteran  
Health Services**

Navigating Healthcare For Our Veterans

## **Submission to the Senate Foreign Affairs, Defence and Trade References Committee**

Inquiry into Advocacy Services for Veterans Accessing Compensation and Income Support

Submitted by: Australian Veteran Health Services (AVHS)

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### **Introduction**

Australians recognise and deeply value the service of our veterans. We expect that those who have served our nation are supported with dignity, fairness, and continuity of care once they leave active service. Veterans and their families deserve clear, ethical pathways to access the entitlements and healthcare they need.

But too often, veterans face a system that is complex, fragmented, and overwhelming. Navigating claims for compensation and income support through the Department of Veterans' Affairs (DVA) can leave individuals feeling frustrated, abandoned, and at risk of worsening mental health outcomes. This challenging environment has allowed unethical actors – including commercial, fee-for-service providers – to exploit veterans through practices such as claims-farming, inducements, referral kickbacks, and even the offshoring of sensitive health data.

These entities often operate outside established professional standards, prioritising profit over veterans' health and wellbeing. Their exploitative practices undermine trust in DVA processes and complicate the government's dual responsibility to protect public funds while ensuring veterans receive the support they deserve.

Accredited medical practices following best practice standards provide a robust alternative. Australian Veteran Health Services (AVHS) offers a veteran-centred, clinician-led model grounded in these principles:

- Comprehensive, face-to-face assessments of veterans' health needs.
- Ethical and transparent processes, with no commissions, inducements, or kickbacks.
- Continuity of care through integration with veterans' local GPs.
- Safeguards that protect privacy and national security.

Because of this model, AVHS is uniquely placed to comment on the Terms of Reference—particularly items (1) the appropriateness of commercial entities providing advocacy services, (3) regulation, training and professional discipline for advocates, and (4) the consideration of previous reviews into the advocacy model.

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## Response to Terms of Reference

### Term of Reference 1: Appropriateness of Commercial Entities

Commercial advocacy businesses often charge upfront fees (these can be in excess of \$2,000) or commissions (typically 5-12%) on compensation payments. This creates conflicts of interest and incentives to pursue high-volume claims regardless of clinical justification. Practices such as “claims farming”, reliance on doctors based overseas to sign diagnosis and impairment forms, and aggressive marketing tactics compromise both veterans’ wellbeing and the integrity of the compensation system.

By contrast, accredited, clinician-led providers such as AVHS prioritise health outcomes, transparency, and veterans’ dignity. Veterans should never be asked to sacrifice part of their entitlements in exchange for accessing support.

**Recommendation 1: Ban commissions and contingency-style fee arrangements for statutory entitlements.**

**Recommendation 2: Ban inducements, misleading advertising, and guarantee-based marketing of compensation outcomes.**

### Term of Reference 3: Regulation, Training, and Discipline

The Advocacy Training and Development Program (ATDP) has created a framework of competency and accountability for volunteer advocates. However, commercial providers currently operate with little oversight, leaving veterans vulnerable.

**Recommendation 3: Require all advocacy providers to be linked with accredited medical practices meeting defined clinical and ethical standards.**

**Recommendation 4: Extend ATDP-style competency, regulation, and professional discipline to all providers, commercial or otherwise, to ensure consistency, accountability, and quality across the sector.**

### Term of Reference 4: Consideration of Previous Reviews

The 2019 Productivity Commission report and subsequent reviews identified the need for reform, including greater transparency and stronger safeguards. While these recommendations were noted, inconsistent implementation has enabled exploitative commercial practices to continue.

**Recommendation 5: Implement outstanding review recommendations with urgency, ensuring reforms are embedded through independent oversight, clear enforcement powers and data security safeguards, including the prohibition of offshoring of veteran medical data.**



## Conclusion

Australians agree that veterans deserve fair, respectful, and effective support. Yet today's system exposes them to confusion, exploitation, and risk. We commend the Senate Foreign Affairs, Defence and Trade References Committee for its commitment to tackling these problems to improve the physical and mental health outcomes for veterans.

AVHS demonstrates that a best-practice, accredited, clinician-led model can deliver ethical advocacy and continuity of care, while protecting taxpayer funds and national security.

We recommend Parliament act decisively to:

1. Prohibit commissions and contingency fees on statutory entitlements.
2. Ban inducements, misleading advertising, and guarantee-based marketing of compensation outcomes.
3. Require all advocacy providers to be linked with accredited medical practices meeting defined clinical and ethical standards.
4. Extend ATDP-style competency, regulation, and professional discipline to all providers, commercial or otherwise.
5. Fully implement recommendations from previous reviews.

AVHS stands ready to work with the Committee, the Department of Veterans' Affairs, and other stakeholders to ensure veterans receive the care and support they deserve.

## References

- Productivity Commission. A Better Way to Support Veterans. Report No. 93, 2019.
- Australian National Audit Office (ANAO). Efficiency of Veterans' Service Delivery by DVA. 2021.
- Senate Foreign Affairs, Defence and Trade References Committee. Inquiry into Advocacy Services for Veterans (47th Parliament evidence). 2022.
- Australian Privacy Commissioner. Guidelines on Handling Personal Information Overseas. 2023.
- Returned & Services League of Australia (RSL). Submission to the Productivity Commission Review. 2018.