



National Association for Veteran Advocacy

5 September 2025

***Senate Standing Committee on Foreign Affairs Defence and Trade.***

***Issues relating to advocacy services for veterans accessing compensation and income support.***

Dear Members of the Senate Committee,

On behalf of the founding members of the National Association for Veteran Advocacy (NAVA), I am writing to express our gratitude for the opportunity to make this submission. We appreciate the Senate Committee's dedication to addressing the concerns and needs of our nation's veterans.

It is important to note that the founding members of NAVA were previously signatories to a submission made by the Veterans, Emergency Services & Police Industry Institute of Australia (VESPIIA). However, each of the founding members has since withdrawn their endorsement and association with the VESPIIA submission. This decision has been formally referenced by an amendment provided by VESPIIA to the Senate Committee. Additionally, each of the founding members has submitted individual corrections to the Senate Committee to clarify their positions.

We believe that this submission by NAVA represents a comprehensive and unified perspective on the issues at hand. Our commitment to advocating for the rights and well-being of veterans remains steadfast, and we are eager to contribute to the ongoing discussions and solutions.

Thank you for considering our submission. We look forward to the opportunity to further engage with the Senate Committee on this important matter.

Sincerely,

National Association for Veteran Advocacy (NAVA)



## Submission

5 September 2025

### Senate Standing Committee on Foreign Affairs Defence and Trade.

#### Issues relating to advocacy services for veterans accessing compensation and income support.

Honourable Members of the Senate Select Committee.

The National Association for Veteran Advocacy (NAVA) welcomes the opportunity to contribute to this Senate inquiry. As a not-for-profit membership body dedicated to advancing the highest standards of professional advocacy, NAVA exists to ensure that the welfare, dignity, and long-term wellbeing of Australia's veterans remain central to all advocacy efforts and outcomes.

Our mission is clear: Veteran advocacy in Australia is at a critical juncture. NAVA brings together a national cohort of practitioners committed to lifting standards, strengthening ethical practice, and embedding a culture of accountability across the sector. Through targeted education, peer collaboration, and principled leadership, we work to ensure that advocacy efforts are not only technically sound but deeply attuned to the lived realities and long-term needs of those who have served. Our members operate with a shared commitment to advancing outcomes that reflect respect, justice, and enduring support for veterans and their families.

NAVA's membership comprises seasoned practitioners who work at the coalface of veteran support - guiding individuals through the complexities of the Department of Veterans' Affairs (DVA) compensation and income support systems. Their collective experience spans thousands of hours of casework, often undertaken without formal recognition or government resourcing. This submission draws on that embedded expertise to offer a system-level perspective informed by direct service delivery.

We welcome the Committee's examination of advocacy service design, performance, and reform. The findings of the Royal Commission into Defence and Veteran Suicide underscore the urgent need for clarity, consistency, and safeguards within the current model. The lived experience of veterans and their families demand a more coherent and accountable framework.



In the absence of sustained public provision, fee-for-service advocacy has emerged to meet unmet demand. This has given rise to a diverse and often misunderstood ecosystem. NAVA does not seek to endorse any commercial structure; rather, we aim to clarify the conditions that led to its development, identify existing safeguards, and propose regulatory measures to ensure quality and accountability. Our focus remains firmly on outcomes ensuring that all veterans, regardless of provider type, receive timely, skilled, and ethically grounded advocacy.

We appreciate the opportunity to contribute to this inquiry and stand ready to assist the Committee in shaping a fit-for-purpose advocacy system - one that places veteran wellbeing, practitioner competence, and public confidence at its core.

## About National Association for Veteran Advocacy (NAVA)

The National Association for Veteran Advocacy is established to provide strategic guidance, sector expertise, and community insight to support the development, implementation, and continuous improvement of advocacy services.

As a peak professional body for veteran advocates, NAVA is committed to strengthening the integrity, capability, and outcomes of advocacy services across Australia. Our objectives reflect a principled, system-wide approach to reform, professionalisation, and sector leadership:

### Oversight and Sector Reform

- Provide expert review and commentary on proposed reforms, strategic initiatives, and program developments affecting veteran advocacy and support services.
- Monitor sector performance indicators and emerging trends to inform evidence-based decision-making and policy refinement.
- Oversee the development and implementation of sector-wide initiatives, including the delivery of services by fee-for-service advocates to Ex-Service Organisations (ESOs), ensuring professionalism, ethical conduct, and veteran-centred outcomes.

### Consultation and Stakeholder Engagement

- Actively contribute to government and institutional consultation processes, offering grounded practitioner insight and strategic policy input.
- Support effective stakeholder engagement across the advocacy ecosystem, fostering collaboration, transparency, and mutual recognition.



### Professionalisation and Capacity Building

- Advise on national priorities relating to training, accreditation, and governance to elevate the standards and consistency of advocacy practice.
- Empower and represent veteran advocates through the provision of education, resources, and ethical leadership, enhancing professional capacity and sector integrity.

### Ethical Standards and Member Accountability

- Promote and uphold the highest standards of professional advocacy, ensuring that all practice remains principled, effective, and aligned with the long-term wellbeing of veterans.
- Ensure that all members of NAVA act in accordance with the Association's Code of Ethics and governance instruments, advancing the dignity, rights, and outcomes of those they serve.

### Systemic Reform and Public Awareness

- Facilitate and contribute to legislative improvement, systemic reform, and public awareness initiatives that strengthen veteran support services and entitlements.
- Develop and disseminate best practice guidance, governance frameworks, and institutional resources that promote legal certainty, operational integrity, and transparency across the sector.

### National Collaboration and Standards Development

- Engage in strategic partnerships with professional bodies, institutions, and stakeholders to harmonise national advocacy standards and promote consistent, high-quality outcomes for veterans.

Our Board currently stands with 4 Directors, representing each of our founding members. These members, Veterans First Consulting, Military Claims, Tactical Advocacy Group and KSC Claims, collectively provide the significant majority of private advocacy services coverage for Australia's veterans. Our mission underpins all that we do at NAVA, and we are passionate about serving a purpose to represent Australia's Veterans and the private advocacy sector.

More than a professional body, NAVA represents those who have fought for our country and have their wellbeing and their family's continued wellbeing at the forefront of their minds. Our commitment to continue to support the community is unwavering and a pillar in our ethics.



## Our Mission Statement

At the National Association for Veteran Advocacy (NAVA), our mission is to champion the highest standards of professional advocacy in service of Australia's veterans. We are a not-for-profit membership body united by a singular purpose, to place the welfare, support, and optimal outcomes of veterans at the heart of everything we do.

We empower and represent veteran advocates through education, collaboration, and ethical leadership ensuring that every member upholds the dignity, rights, and the long-term wellbeing of those who have served. Guided by our unwavering 'North Star', we foster a culture of integrity, compassion, and excellence in advocacy, so that every veteran receives the respect, care, and outcomes they deserve.

## Terms of Reference

This submission addresses the following Terms of Reference outlined by the Committee:

- (a) The appropriateness and risks of fee-charging advocacy models in supporting veterans and their families to access compensation and income support.
- (c) The adequacy of the current regulation, training, and professional standards of advocates operating within both volunteer and paid models.
- (d) Relevant findings and recommendations from previous inquiries, including the Royal Commission into Defence and Veteran Suicide and related reviews.
- (e) Any related matters, including service access, quality, and unmet demand from veterans seeking assistance.

While we acknowledge the importance of all Terms of Reference, our focus is grounded in the lived experience and practical expertise of fee-for-service practitioners, guided by NAVA's role in championing professionalism, integrity, and sector leadership.



## Submission

Veteran advocacy services are delivered through both compensation and welfare advocates, operating under varying levels of regulation and oversight.

The introduction of fee-for-service advocacy is a comparatively recent development.

While concerns have been expressed regarding the receipt of commercial remuneration by advocates, the existence of paid services is not inherently problematic. In sectors where both voluntary and remunerated providers operate, such discourse is to be expected. The critical consideration is not the remuneration model, but whether advocacy services deliver appropriate, effective, and sustainable outcomes for veterans.

NAVA has been established as the sector's dedicated regulatory body to promote fair and reasonable fee structures, uphold professional and ethical standards, and ensure that the highest standard of care is consistently provided to veterans.

In assessing the value of advocacy services, whether paid or voluntary, reference must be made to the statutory objects of the *Military Rehabilitation and Compensation Act 2004 (MRCA)* and the mission of the Department of Veterans' Affairs to support the wellbeing of veterans and their families.

Within the fee-for-service model, due diligence is embedded as a safeguard to ensure veterans make fully informed decisions regarding their entitlements. NAVA promotes and requires, consistent with determination guidance, the integration of independent financial and legal advice before a veteran elects how payments or compensation will be received. This structured process, and the introduction of independent financial and legal advice through 'at arm's length' to the veteran advocate, reflects a regulated and professional standard of service that prioritises transparency, mitigates risks of disadvantage, and ensures that no injustice or conflict of interest is entertained. At its core, the framework is designed to uphold the paramount concern: protecting the rights, interests, and wellbeing of veterans.

Beyond safeguarding veterans, NAVA's governance framework represents a turning point for the advocacy sector in whole. For the first time, a dedicated regulatory body proposes to establish and enforce consistent professional standards, transparent fee structures, and robust accountability measures that benefit all service providers. By embedding governance at the heart of advocacy, NAVA strengthens sector integrity, reduces fragmentation, encourages professionalisation, and builds public and stakeholder confidence. This comprehensive approach ensures a sustainable, trusted,



and high-performing system that elevates outcomes for veterans while supporting the ongoing development and stability of the sector.

## Primary Concerns in the Sector (Current State)

The Australian veteran advocacy sector plays a critical role in supporting veterans to access their entitlements and navigate complex claims processes. However, the sector faces several ongoing challenges that impact consistency, quality, and trust in advocacy services. The following outlines the primary concerns currently observed across the sector, highlighting areas where regulation, professionalisation, and governance could strengthen outcomes for veterans and service providers alike. This submission acknowledges the challenges and concerns do not stem from one service model, and it is important to highlight the need for reform across the Advocacy sector in general.

### 1. Inconsistent Regulation and Oversight

- Advocacy services are delivered through a mix of volunteer (ESO-based) and paid providers.
- There is no uniform regulatory framework, leading to variable standards, practices, and accountability.

### 2. Professionalisation and Training Gaps

- Training and competency standards differ across providers, with some advocates lacking formal accreditation.
- Limited pathways exist to professionalise advocacy, particularly for fee-for-service providers.

### 3. Fee Structures and Perceived Conflicts

- The emergence of fee-for-service advocacy has generated concern in some forums regarding commercial gain.
- Lack of clarity around fair and reasonable fees can undermine trust and create perceptions of inequity.
- The practice of incentive payments received by advocates for service provider referrals has significantly undermined the integrity of the sector.

### 4. Sector Fragmentation

- Services are delivered across multiple ESOs and independent providers, resulting in duplication, inefficiencies, and inconsistent support for veterans.





#### **5. Limited Oversight of Outcomes**

- There is currently no systematic monitoring of service effectiveness, quality, or veteran outcomes across the sector.

#### **6. Access to Specialist Advice**

- ESO advocates typically do not provide financial or legal advice, limiting holistic support for veterans with complex claims.
- Fee-for-service models can provide this, but integration and regulation of these services vary. Need to promote the use of independent financial and legal advisors to provide ‘arms length’ advice to veterans regarding their claims.

#### **7. Public and Stakeholder Confidence**

- Variability in standards and practices can erode trust among veterans, families, and government stakeholders.
- There is a need for transparent governance to assure both veterans and the broader sector of professional and ethical practices.

#### **8. Concerning Medical Report Practices**

- Vertically integrated models: In some cases, advocacy providers refer clients to in-house or affiliated medical assessors, raising risks of over-diagnosis and unnecessary testing.
- Impact on veterans: These practices can exacerbate distress, create procedural risks, and reinforce illness-focused identity rather than rehabilitation and recovery.

### **A sector wide need for reform**

These challenges are not confined to any single service model; they reflect a fragmented and under-regulated sector that would benefit from coordinated reform. NAVA advocates for a comprehensive, sector-wide approach encompassing professional standards, training, digital infrastructure, and accountability mechanisms.

The NAVA Fee-for-Service Advocates Subcommittee has initiated the development of a self-regulatory framework designed to establish baseline standards for ethical practice, service quality, and consumer protection. We believe this framework has the potential to serve as a model applicable across all advocacy modalities, whether fee-for-service, volunteer-based, or hybrid.

The members are committed to the work undertaken by NAVA to date and the proposed steps for building a national framework of accountability for advocates. This initiative is





being advanced in good faith and with an open invitation for collaboration across the sector.

We recognise the opportunity for organisations such as NAVA, VESPIIA, and the newly established Institute of Veteran Advocacy (IVA) to work together, constructively and respectfully, with a shared commitment to developing and implementing a unified sector framework that places veteran outcomes above all considerations of service model.

## Role of Private Advocates in the Sector

The fee-for-service (private) advocacy model plays an essential and complementary role within the veteran support sector. It responds to the growing demand and complexity of claims that cannot be fully met by ESO-based volunteer advocates, ensuring that veterans retain timely access to skilled representation. Through this model, advocacy is delivered as a professional service, enabling dedicated case management, integration of financial and legal advice, and a consistent standard of support for veterans with complex needs. Importantly, the model provides veterans with genuine choice in how they access advocacy, recognising their right to select the form of assistance most appropriate to their circumstances.

By embedding transparency, fair fee structures, and professional standards under NAVA's governance framework, private advocacy strengthens the credibility, sustainability, and overall effectiveness of the sector. Far from being in competition with volunteer-based advocacy, it provides a complementary pathway that expands capacity and upholds the shared mission of securing the best possible outcomes for veterans and their families.

### 1. Role of a Private (Fee-for-Service) Advocate

Private advocates provide professional services to veterans in navigating compensation and welfare claims, particularly under legislation such as the *Military Rehabilitation and Compensation Act 2004 (MRCA)* and the *Veterans' Entitlements Act 1986 (VEA)*. Their role typically includes:

- Case management and representation: Assisting veterans to prepare, lodge, and progress complex claims and appeals (VRB, AAT).
- Specialist expertise: Applying detailed knowledge of veterans' legislation, entitlements, and policy frameworks.
- Holistic support: Coordinating access to independent legal or financial advice, especially where lump sums, superannuation, or estate matters are involved.



- Consistency and timeliness: Providing continuity of service, particularly where ESO volunteer availability may be limited.
- Professional accountability: Operating under governance and professional standards, as promoted by NAVA.

## **2. Why This Model Has a Place in the Sector**

- Meeting demand: The volume and complexity of veteran claims often exceed the capacity of ESO volunteer-based services, creating a service gap. Private advocates fill this gap by offering additional capacity and expertise. This also allows for wait times to be reduced and the main priority of the veteran is forefront of mind.
- Professionalisation: Fee-for-service models allow advocacy to develop into a recognised profession, with standards, governance, and accountability, strengthening overall sector credibility.
- Choice and empowerment: Veterans are given greater choice of who represents them, ensuring access to a tailored service that suits their circumstances. This means they can base their choice on advocates who they align with and has shared their lived experience.
- Integration with specialists: Unlike ESO advocates, private advocates can build structured relationships with financial advisors, lawyers, and medical specialists, enabling more holistic and informed decision-making.
- Fair and reasonable remuneration: Payment recognises the value of professional expertise and allows advocates to dedicate full-time attention to cases, ensuring sustained quality of service.
- Complementary, not competitive: Fee-for-service advocacy is not intended to replace ESO advocacy but to complement it, ensuring veterans are supported whether they prefer volunteer-based or professional assistance.

## **3. Alignment with NAVA's Role**

NAVA positions private advocacy as:

- Fair and transparent: Oversight mechanisms ensure that fee structures remain reasonable, proportionate, and consistent with ethical obligations and quality assurance standards.
- Veteran-first: Ensuring that financial remuneration never overrides the primary purpose of securing the best possible outcomes for veterans.
- Sector-strengthening: Contributing to a more sustainable and professional sector, working in partnership with volunteer advocates and ESOs.



## Code of Ethics Summary

The Code of Ethics establishes the expected ethical standards and professional behaviours of members of the National Association for Veteran Advocacy (NAVA). The Code reflects a shared commitment to integrity, independence, transparency, accountability, and the promotion of public trust. It recognises that advocacy on behalf of our veterans carries unique responsibilities requiring clear ethical boundaries, declared interests, and an unwavering focus on the veteran and public good.

NAVA exists for the principal charitable purpose of advancing the welfare, support, and optimal outcomes of Australian veterans through the provision of education, training, resources, and ethical leadership of its members, thereby fostering a culture of integrity, compassion, excellence, transparency, and accountability in all aspects of veteran advocacy.

By adhering to the Code, advocates affirm their dedication to truthfulness, respectful engagement, and ethical stewardship, ensuring that their advocacy reflects not only the interests of their clients or communities, but is free of any perceived or actual conflicts that in any way would diminish the integrity or 'veteran centric' focus of the profession.

(SEE ANNEXURE 1 FOR MORE DETAILS)

## Conflict of Interest

### Safeguarding Integrity Through a Robust Conflict of Interest Policy for the National Association for Veteran Advocacy (NAVA)

The National Association for Veteran Advocacy (NAVA) is committed to upholding the highest standards of integrity, transparency, and veteran-centric professionalism in its operations and leadership. Central to this commitment is the development and implementation of a robust Conflict of Interest Policy that enables NAVA's Responsible People including board members, committee representatives, and key personnel to identify, disclose, and appropriately manage actual, potential, or perceived conflicts of interest.

This policy is not merely a compliance mechanism; it is a foundational governance safeguard that ensures NAVA's decision-making remains impartial, accountable, and aligned with its core mission: to champion the welfare and rights of veterans through principled advocacy and professional excellence.

In accordance with the Australian Charities and Not-for-profits Commission (ACNC) Governance Standard 5, NAVA recognises the legal and ethical imperative for its Responsible People to act in good faith, in the best interests of the association, and free



from any conflicting loyalties that could compromise public trust or organisational integrity. NAVA's well-articulated Conflict of Interest Policy:

- Establishes clear procedures for disclosure, documentation, and resolution of conflicts.
- Promotes a culture of transparency and ethical awareness across all levels of governance
- Protects NAVA's reputation and ensure its advocacy remains unambiguously veteran-focused
- Reinforces public confidence in the association's independence and professional standards

Given the sensitive nature of veteran advocacy, particularly paid advocacy, and the potential for perceived conflicts to undermine stakeholder confidence, the development of this policy is seen as both critical and urgent. It serves as a cornerstone of NAVA's institutional framework, supporting its long-term objective to professionalise veteran advocacy nationally and ensure that all actions taken by the association are guided solely by the best interests of veterans.

(SEE ANNEXURE 2 FOR MORE DETAILS)

## Constitution

The **Constitution of the National Association for Veteran Advocacy Ltd** (NAVA) is an important DNA document outlining the structure, purpose, and governance of the Company.

The primary purpose of the Company is to advance the welfare, support, and optimal outcomes of Australian veterans through the promotion and professionalisation of advocacy services.

The constitution details the objects of the Company, which include promoting high standards of professional advocacy, empowering and supporting veteran advocates, fostering a culture of integrity and accountability, and contributing to systemic reform and public awareness regarding veteran support services.

The constitution also covers the legal status of the Company as a not-for-profit entity, its powers, income and property management, membership eligibility and classes, governance structure, financial management, ethics and conduct, indemnity and insurance, and procedures for amending the constitution and winding up the Company.

(SEE ANNEXURE 3 FOR MORE DETAILS)



## Training and Competency Framework

This submission recommends the establishment of a nationally regulated, competency-based training and accreditation framework for all individuals and organisations delivering veteran advocacy services.

The framework will:

- Replace the outdated ATDP with a unified, fit-for-purpose system addressing longstanding policy, capability, and structural gaps.
- Set a baseline of foundational knowledge, while recognising that most training occurs through practical, on-the-job experience delivered by individual firms.
- Provide tiered accreditation pathways aligned to role complexity and scope of service.
- Introduce specialist modules in complex and currently under-regulated areas, including Retrospective Medical Discharge (RMD) and Commonwealth Superannuation Corporation (CSC) entitlements.
- Mandate Continuing Professional Development (CPD) to ensure advocates maintain current knowledge and practice standards.
- Be supported by a regulatory model overseeing training delivery, accreditation, compliance, and sector-wide quality assurance.

Importantly, the framework will apply consistency across both free and fee-for-service advocacy models, promoting national standards, professionalisation, and public confidence, while preserving flexibility for individual organisations in how training is delivered.

The overarching objective is clear: to ensure that anyone acting in an advocacy capacity is suitably prepared, accredited, and resourced to prioritise the rights, interests, and wellbeing of veterans above all else.

(SEE ANNEXURE 4 FOR MORE DETAILS)



## Conclusion

In conclusion, the National Association for Veteran Advocacy (NAVA) remains steadfast in its commitment to achieving optimal outcomes for our nation's veterans. This submission underscores our dedication to maintaining the dignity and well-being of veterans, ensuring they receive the support and recognition they deserve.

NAVA exists to unify and strengthen the veteran advocacy sector, placing the rights, well-being, and outcomes of veterans at the centre of all activity. By establishing professional standards, ethical oversight, and fair and reasonable fee structures, NAVA ensures that advocacy services, whether volunteer-based or fee-for-service, operate within a regulated, accountable, and outcome-focused framework. Through education, collaboration, and governance, NAVA fosters a culture of integrity, professionalism, and excellence, providing veterans with confidence that their advocates are guided by best practice and their interests are paramount.

The creation of NAVA represents a turning point for the sector, providing consistency, sustainability, and trust across all advocacy models. By embedding governance, due diligence, and robust professional standards, NAVA not only safeguards veterans but also strengthens the sector, ensuring its long-term stability, credibility, and capacity to deliver meaningful, high-quality outcomes for Australia's veterans and their families.

NAVA is unwavering in its commitment to continuous professional improvement. We are dedicated to working collaboratively with all stakeholders, including the Senate, to ensure that our efforts result in the best possible outcomes for our valued veterans. Our goal is to create a comprehensive and effective framework that addresses the unique needs of veterans and enhances their quality of life.





We appreciate the opportunity to present this submission and look forward to engaging further with the Senate Committee to advance the interests of veterans. Together, we can make a meaningful difference in the lives of those who have served our country.

Thank you for your consideration.

Sincerely,



## Signatories:

Company	Representative	Signature
Veterans First Consulting	Tom Kliese	
 VETERANS FIRST CONSULTING	Kevin Chapman	
KSC Claims	Luke Armstrong	
	Matt Durmans	
Military Claims	Christopher Goodlet	
		
Tactical Advocacy Group	Stephen Murton	
		





## Table of Contents – Annexures

*Code of Ethics - Annexure 1 – Page 18*

*Conflict of Interest – Annexure 2 – Page 27*

*Constitution – Annexure 3 – Page 30*

*Training Framework – Annexure 4 – Page 34*



## Annexure 1 – Code of Ethics

### **Code of Ethics – National Association for Veteran Advocacy (NAVA)**

#### **1. Purpose**

This Code of Ethics establishes the expected ethical standards and professional behaviours of members of the National Association for Veteran Advocacy (NAVA). This Code reflects a shared commitment to integrity, independence, transparency, accountability, and the promotion of public trust. It recognises that advocacy on behalf of our veterans carries unique responsibilities requiring clear ethical boundaries, declared interests, and an unwavering focus on the veteran and public good.

NAVA exists for the principal charitable purpose of advancing the welfare, support, and optimal outcomes of Australian veterans through the provision of education, training, resources, and ethical leadership of its members, thereby fostering a culture of integrity, compassion, excellence, transparency, and accountability in all aspects of veteran advocacy.

By adhering to this Code, advocates affirm their dedication to truthfulness, respectful engagement, and ethical stewardship, ensuring that their advocacy reflects not only the interests of their clients or communities, but is free of any perceived or actual conflicts that in any way would diminish the integrity or ‘veteran centric’ focus of the profession.

#### **2. Scope**

This Code applies to all members of NAVA and any employee, subcontractor, consultant or advisor who is employed, or contracted in any way (whether paid or volunteer) by a NAVA member to support or provide veteran advocacy. It governs all forms of professional conduct, representation, and communication undertaken in connection with veteran advocacy, whether within the member’s business or as a function of being a NAVA member, in official meetings, public appearances, private briefings, stakeholder engagements, or online and digital platforms.

The Code provides a clear framework for managing dual accountabilities, avoiding conflicts of interest, and ensuring advocacy remains principled, transparent, and aligned with the charitable purpose and objects of NAVA’s constitution, whilst ensuring at all times compliance and cooperation with the Department of Veteran Affairs (DVA) and the recommendations of the Royal Commission.



### **3. Guiding Principles**

#### **A. Respect and Dignity**

- Treat all veterans, colleagues, and stakeholders with respect and dignity.
- Avoid any form of discrimination, harassment, or bullying.
- Foster an inclusive environment where everyone feels valued and heard.

#### **B. Integrity and Honesty**

- Conduct all activities with honesty and integrity.
- Avoid conflicts of interest and disclose any potential conflicts promptly.
- Ensure transparency in all communications and transactions.

#### **C. Confidentiality**

- Respect the privacy and confidentiality of veterans and their families.
- Do not disclose any personal or sensitive information without proper authorization.
- Handle all data and information with the utmost care and security.

#### **D. Professionalism**

- Maintain a high standard of professionalism in all interactions and activities.
- Be punctual, reliable, and accountable for your actions.
- Continuously seek to improve your skills and knowledge in the field of veteran advocacy.

#### **E. Compliance with Laws and Regulations**

- Comply with all applicable laws, regulations, and organizational policies.
- Report any illegal or unethical behaviour to the appropriate authorities.
- Ensure that all actions are in line with the mission and values of the organization.

#### **F. Collaboration and Teamwork**

- Work collaboratively with colleagues, partners, and stakeholders.
- Share knowledge and resources to achieve common goals.
- Support and encourage each other to create a positive and productive work environment.

#### **G. Commitment to Veterans**

- Prioritize the needs and well-being of veterans in all activities.
- Advocate for the rights and benefits of veterans with dedication and passion.
- Provide high-quality services and support to veterans and their families.

#### **H. Accountability**

- Take responsibility for your actions and decisions.
- Be open to feedback and willing to make improvements.
- Ensure that all activities are conducted in a responsible and ethical manner.



#### **4. Specific principles for Board members of NAVA**

##### **A. Voluntary Participation**

Participation on the Board is entirely voluntary and undertaken in good faith. Members commit to serving the Board's self-regulatory function with sincerity and dedication, free from any coercion, undue influence, or external pressures. Members must actively avoid situations that create or appear to create bias or conflicts of interest, ensuring their contributions are motivated solely by the Board's mission and ethical obligations.

*Example:* A Board member is invited to join a working group but feels overwhelmed by current commitments. They communicate this honestly and respectfully decline, ensuring their decision is free from pressure and that they can participate effectively when able.

##### **B. Ethical Integrity**

Members are expected to uphold the highest standards of honesty, fairness, and integrity in all their actions related to the Board. This includes acting impartially, avoiding favouritism or discrimination, and refraining from conduct that could harm the Board's reputation or undermine its objectives. Members should model ethical behaviour, foster trust within the Board and with external stakeholders, and promptly address any breaches of integrity they encounter.

*Example:* During a meeting, a member discovers that a colleague has withheld relevant information that could impact a decision. The member raises this concern confidentially to the Ethics Officer, prioritising transparency and fairness over maintaining personal relationships.

##### **C. Stewardship**

Members serve as stewards of their respective industry, communities, or professional domains, with a responsibility to promote sustainable, equitable, and long-term benefits to society. Personal, commercial, or organisational interests must never take precedence over the public good. Members should seek to enhance the credibility and effectiveness of the Board's role, champion ethical standards, and support policies or initiatives that strengthen the broader ecosystem they influence.

*Example:* A member is approached by a company seeking to influence the Board's position on a policy. The member refuses to advocate for the company's narrow interests, instead promoting recommendations that support the wider community's long-term wellbeing.



#### **D. Professional Accountability**

Members bear individual and collective accountability for their decisions, behaviour, and contributions to the Board's work. They must be open to constructive scrutiny, feedback, and continuous improvement, accepting responsibility for mistakes or lapses in judgement. Transparency in decision-making processes and a willingness to engage in reflective practice are essential to maintaining the Board's legitimacy and effectiveness.

*Example:* After a Board decision results in unintended negative consequences, a member publicly acknowledges their role in the decision, participates in a review process, and supports measures to prevent similar issues in the future.

#### **E. Inclusivity and Equity**

The Board is committed to fostering an environment of equitable participation and inclusive decision-making. This means actively promoting diversity across multiple dimensions, such as sector, experience, cultural background, gender, and thought, and ensuring that all voices are heard and respected. Members must guard against unconscious bias, exclusionary practices, or barriers to participation, striving to create a safe and welcoming space for collaboration.

*Example:* The Chair notices that some members from diverse backgrounds are less vocal during meetings. They implement facilitation techniques that encourage everyone to contribute and organise training on unconscious bias for the Board.

#### **F. Independence**

To maintain credibility and impartiality, all advice and recommendations provided by the Board must be free from political, commercial, or personal influence. Members are required to fully disclose any actual, perceived, or potential conflicts of interest prior to participating in relevant discussions or decisions. Where such conflicts exist, members must recuse themselves to safeguard the Board's independence, and the trust placed in its outputs.

*Example:* A member has a close business relationship with an organisation that is the subject of a Board review. They disclose this conflict and recuse themselves from the discussion to ensure the Board's impartiality.

#### **G. Authenticity and Accuracy**

All public statements, reports, and outputs attributed to the Board must be truthful, accurate, and grounded in reliable evidence. Members must ensure that communications honestly reflect the Board's consensus, and where differences of opinion exist, these should be transparently disclosed. Avoiding misrepresentation,



exaggeration, or omission of key facts is critical to preserving the Board's integrity and public confidence.

*Example:* When issuing a public statement, the Board includes both the majority recommendation and a minority report from dissenting members, ensuring that all perspectives are transparently communicated to stakeholders.

## **5. Expected Conduct NAVA Board members and officials**

Members must:

### **A. Respect Confidentiality**

Members shall maintain the confidentiality of all sensitive information discussed during Board meetings or related activities, unless explicitly authorised for disclosure. This includes protecting the privacy of individuals, proprietary data, and strategic deliberations to preserve trust and the integrity of the Board's work.

*Example:* A Board member attends a confidential strategy session and later is invited to speak at a public event. They carefully avoid sharing any sensitive details discussed in the meeting, respecting the confidentiality agreement and preserving trust.

### **B. Engage Constructively and Professionally**

Members are expected to contribute to discussions respectfully and thoughtfully, fostering an environment where diverse viewpoints can be expressed openly without fear of dismissal or personal attack. They should listen actively, avoid interrupting, and focus on issues rather than individuals to support collaborative decision-making.

*Example:* During a heated debate, a member listens fully to opposing views without interruption, responds calmly with evidence-based points, and encourages quieter members to share their perspectives, helping maintain a respectful and inclusive dialogue.

### **C. Declare Conflicts of Interest Transparently**

Prior to any deliberations, members must fully disclose any actual, perceived, or potential conflicts of interest, whether personal, financial, or organisational, that might influence their impartiality. Transparency enables the Board to manage conflicts appropriately, including recusal where necessary, to uphold decision-making integrity.



*Example: Before discussing a funding proposal, a member discloses that their organisation stands to benefit financially from the decision. The Board acknowledges this disclosure, and the member recuses themselves from the vote to prevent bias.*

#### **D. Uphold the Board's Objectives and Reputation**

Members carry the responsibility to act in ways that advance the mission and values of the Board and NAVA. This includes supporting Board decisions publicly once made, maintaining a positive and professional image, and refraining from behaviour that could undermine stakeholder confidence or the Board's credibility.

*Example: After the Board makes a public policy recommendation, a member publicly supports the collective decision, even if they personally advocated for a different approach during discussions, thereby reinforcing Board unity and credibility.*

#### **E. Avoid Personal or Political Gain**

Board membership is a position of trust and public service. Members must not leverage their role for personal, commercial, or political advantage, such as promoting private business interests, soliciting clients, or advancing partisan agendas through Board-related activities or communications.

*Example: A member declines to promote their private consultancy business during Board meetings or through Board communications, ensuring their role is not used to advance personal commercial interests.*

#### **F. Support Ethical Culture through Mentorship**

Experienced members should actively support the induction, development, and ethical growth of new members and other stakeholders. This involves sharing knowledge, modelling exemplary behaviour, providing constructive feedback, and encouraging adherence to the Board's ethical standards to cultivate a strong, values-driven culture.

*Example: An experienced member voluntarily meets with a newly appointed member to explain Board processes, shares tips on ethical decision-making, and encourages them to raise any concerns openly, fostering a supportive and transparent culture.*

#### **G. Effective Communication**

Board members are expected to model high standards of communication, both within the organisation and in all external interactions. This includes demonstrating professionalism, respect, clarity, and courtesy in all forms of communication verbal, written, and digital. Constructive dialogue, active listening, and a commitment to





transparency are essential to fostering trust, collaboration, and effective governance. Any concerns regarding breaches of these communication standards may be addressed through the NAVA complaints process, which provides a fair, transparent, and accountable mechanism for resolving grievances and upholding the integrity of the organisation.

*Example:* When engaging with stakeholders, such as veteran clients, advocacy partners, Department of Veteran Affairs, or other regulatory bodies, board members must avoid dismissive language, personal criticism, or any form of aggressive tone, particularly in written communications or public forums. Inappropriate, offensive, or misleading communication will not be tolerated.

## **6. Governance and Enforcement of the Code of Ethics**

A robust governance and enforcement framework ensures that the Code of Ethics is applied consistently, fairly, and transparently. It protects the integrity of the Board, reinforces member accountability, and upholds public trust in NAVA's self-regulatory leadership model.

### **A. Reporting and Addressing Breaches**

Alleged breaches of this Code will be subject to a clear, procedurally fair process overseen by either:

- A designated Ethics Subcommittee of the Board, or
- An independent Ethics Officer, appointed to provide impartial oversight.

Any individual, whether a Board member, stakeholder, or member of the public, may submit a written complaint or concern regarding a potential breach. All allegations will be handled in confidence, and principles of natural justice will apply throughout the process.

The process for responding to a breach includes:

1. Initial Assessment to determine whether the matter falls within the scope of the Code.
2. Notification of the respondent and opportunity to respond to the allegation.
3. Evidence Gathering and interviews if required.
4. Deliberation and Determination of whether a breach occurred.
5. Recommendation of Appropriate Outcomes in proportion to the seriousness of the breach.

### **B. Sanctions and Remedial Actions**

Where a breach is confirmed, the Board may apply one or more of the following responses, based on severity, impact, and intent:



- Informal Resolution (e.g., education, coaching, or verbal caution)
- Written Warning outlining expectations for future conduct
- Suspension from meetings or duties for a defined period
- Formal Censure, documented in Board records
- Removal from the Board by formal vote, in line with governance rules
- Public Disclosure of misconduct, in cases where reputational risk or public interest justifies transparency

Where appropriate, remedial actions may also include:

- Required training in ethics, governance, or conflict of interest
- Mediation between affected parties
- Restorative practices to rebuild trust and Board cohesion

### **C. Annual Review and Continuous Improvement**

This Code of Ethics will be formally reviewed at least once every 12 months, or sooner if:

- There are significant changes to the NAVA framework
- New legal, regulatory, or professional standards emerge
- A material breach prompts structural review
- The Board identifies gaps or ambiguities in implementation

Reviews will be conducted by the Ethics Subcommittee or a nominated independent reviewer, with recommendations tabled to the full Board for adoption.

All changes to the Code must be documented, approved, and communicated to members. Training or briefing sessions will be provided when updates materially alter member responsibilities.

### **D. Fees**

Members engaged in fee-for-service veteran advocacy must act in a fair, reasonable, and transparent manner in all matters relating to fees and charges for advocacy services.

Fee structures must be clearly communicated, appropriately justified, and reflect the nature and complexity of the services provided.

Members must ensure that any fees charged are in the best interests of veterans and their families, uphold the integrity of the advocacy profession, and align with relevant regulatory, ethical, and professional standards. Members must not engage in any form of inducement or referral fees to engage service providers in relation to advocacy services. Personal financial interests must not compromise decisions, and all fee-related matters must be managed free from actual or perceived conflicts of interest.



### **E. Pro Bono**

Members should endeavour to support and uphold a fair and reasonable provision of pro bono advocacy services to veterans and their families, recognising the vital role such services play in promoting equitable access to support. Pro bono work should be offered in a manner that is respectful, non-discriminatory, and guided by the best interests of the veteran. Where pro bono services are provided, they must meet the same standards of professionalism, diligence, and care as paid services. Members should ensure that decisions around the allocation and scope of pro bono work are transparent, consistent, and aligned with the organisation's values, capacity, and ethical obligations.

### **F. Acknowledgement**

All members of NAVA are required to formally acknowledge their understanding and acceptance of this Code of Ethics as a condition of their membership.

Each member must sign a written Declaration of Commitment, confirming that they:

- Have read and understood the Code in full, including its principles, expectations, and enforcement provisions.
- Accept personal and collective responsibility for upholding the ethical standards and behaviours set out herein.
- Commit to acting in good faith, maintaining integrity, transparency, and accountability in all veteran advocacy -related activities.
- Agree to disclose any conflicts of interest and engage respectfully, inclusively, and independently in all deliberations; and
- Understand the consequences of non-compliance, including the potential for investigation, sanctions, or removal of membership.

The signed declaration will be retained by the Board Secretariat and reviewed annually in conjunction with Code review processes or upon any material updates.

This acknowledgement is not a symbolic gesture, it affirms each member's professional commitment to the principles of self-regulation, public trust, and the NAVA-aligned governance framework.



## Annexure 2 – Conflict of Interest

### Conflict of Interest Policy

National Association for Veteran Advocacy (NAVA)

September 2025

#### 1. Purpose

To help NAVA's Responsible People (board and any committee members) and key personnel identify, disclose and manage actual, potential or perceived conflicts of interest to protect NAVA's integrity and comply with ACNC Governance Standard 5.

#### 2. Scope

Applies to all board members, committee members, and officers/employees who prepare board papers, manage procurement, or influence decisions. NAVA may also extend this to volunteers or contractors engaged in governance or procurement.

#### 3. Definitions

**Conflict of interest:** when personal interests or duties conflict (or appear to) with the duty to act in NAVA's best interests. Includes financial and non-financial interests; direct and indirect (family, close associates, entities), and conflicts of duty-to-duty.

**Responsible People:** board/committee members as defined by the ACNC.

#### 4. Principles

Conflicts are common and manageable if disclosed early and handled transparently. Decisions must be made in NAVA's best interests, documented, and withstand public scrutiny.

#### 5. Roles & responsibilities

<b>Board</b>	owns this policy; ensures systems exist to identify, disclose, manage and record conflicts of interest; reviews annually.
<b>Chair</b>	facilitates disclosures, determines interim controls, and ensures recusals/minutes are accurate.
<b>Company Secretary</b>	maintains the Register of Interests, records controls and board decisions, and coordinates annual declarations.



<b>(Register Owner)</b>	
<b>All covered persons</b>	disclose conflicts promptly and comply with controls.

## 6. Identification & disclosure

Annual declaration: all covered persons complete and sign a declaration each year; changes notified within 7 days.

Meeting-by-meeting: “Interests & Conflicts” is a standing first agenda item. Any interest relevant to an agenda item must be declared before discussion.

Register of Interests: records the nature/extent, affected decisions, controls, voting outcomes, and review dates.

If all members share the same conflict, the board must consider ACNC guidance (e.g., independent advice, member resolution, appointing additional directors).

## 7. Managing conflicts

After disclosure, the non-conflicted board members decide controls, which may include:

- Recusal from vote (minimum), leaving the room for discussion, or no participation in papers/briefings.
- Independent review (e.g., second quote, external probity).
- Reallocation of responsibility or, in significant cases, resignation from a role.
- Decisions and reasons should be recorded in the board or committee minutes and entered in the Register.

## 8. Gifts, hospitality & benefits

Declare any gift/hospitality/benefit  $\geq$  \$50 (single) or  $\geq$  \$150 (aggregate per source per year).

Prohibited: cash equivalents; benefits that could reasonably influence decision-making.

Acceptable low-value tokens may be retained at the Chair’s discretion; otherwise transfer to NAVA or decline. (All entries recorded in the Register.)



Referral fees and inducements: NAVA and its representatives declare that we have not, and will not, accept referral fees, inducements, gifts, or any other form of benefit from medical providers (or other service providers) in relation to client referrals. We remain committed to acting solely in the best interests of veterans, free from conflicts of interest or the appearance of impropriety.

#### 9. Procurement & related-party transactions

Disclose any connection to tenderers/suppliers. Obtain competitive quotes; conflicted persons do not draft specs, evaluate, or approve. Related-party transactions must be on arm's-length terms and transparently recorded.

#### 10. Employment of relatives/associates

Any recruitment involving a related person requires prior disclosure, independent panel oversight, and conflict controls (recusal from interviews/decisions).

#### 11. Confidentiality

Information disclosed for conflict-of-interest purposes is kept confidential and accessed only by the Chair, Register Owner, auditors, or as required by law.

#### 12. Breaches

Suspected non-compliance is investigated by the Chair (or a delegated independent director). Confirmed breaches may result in additional training, removal from a committee role, or initiation of board vacancy processes, proportionate to seriousness. All outcomes will be recorded in the Register.

#### 13. Training & onboarding

All covered persons receive annual conflict of interest training and onboarding guidance, with links to ACNC resources.

#### 14. Review

This policy is reviewed annually or after any significant incident/regulatory change; updates are approved by the board and version controlled.

#### 15. Contacts

For questions about this policy, contact the board or Tish Mios



## Annexure 3 – Constitution

### **Constitution of the National Association for Veteran Advocacy Limited**

*(A Company Limited by Guarantee)*

#### **1. Name of Company**

The name of the company is National Association for Veteran Advocacy Limited (hereinafter referred to as “the Company”).

#### **2. Legal Status**

The Company is a public company limited by guarantee, incorporated pursuant to the Corporations Act 2001 (Cth), and established as a not-for-profit entity.

#### **3. Objects**

The Company is established for the principal purpose of advancing the welfare, support, and optimal outcomes of Australian veterans through the promotion and professionalisation of advocacy services. Without limiting the generality of the foregoing, the Company’s objects include:

- a) To promote, uphold, and continuously improve the highest standards of professional advocacy in service of Australian veterans, ensuring that advocacy practice remains principled, effective, and veteran-centred.
- b) To empower, represent, and support veteran advocates through the provision of education, training, resources, and ethical leadership, thereby enhancing the capacity and integrity of the advocacy profession.
- c) To foster and maintain a culture of integrity, compassion, excellence, and accountability in all aspects of veteran advocacy, both within the Company and across the broader sector.
- d) To ensure that all members of the Company uphold and advance the dignity, rights, and long-term wellbeing of veterans, and act in accordance with the Company’s Code of Ethics and governance instruments.
- e) To facilitate and contribute to systemic reform, legislative improvement, and public awareness in relation to veteran support services, entitlements, and policy frameworks.
- f) To engage in genuine collaboration, strategic partnerships, and mutual recognition with other professional membership bodies, institutions, and stakeholders that represent or support veteran advocates, for the purpose of strengthening national advocacy standards and outcomes.
- g) To develop and disseminate best practice guidance, governance frameworks, and institutional resources that promote transparency, legal certainty, and operational integrity in veteran advocacy; and
- h) To undertake any ancillary activities that are consistent with the above objects or that further the Company’s principal purpose.





#### **4. Powers**

Subject to the Corporations Act and this Constitution, the Company has all the powers of a natural person and a body corporate, including but not limited to:

- a) Entering contracts and arrangements.
- b) Acquiring, holding, and disposing of property.
- c) Employing staff and engaging contractors.
- d) Raising funds through lawful means including grants, donations, and sponsorships.
- e) Establishing committees, advisory panels, and working groups; and
- f) Publishing materials and conducting training, seminars, and conferences.

#### **5. Income and Property**

5.1 The income and property of the Company will be applied solely towards the promotion of charitable purposes consistent with its objects.

5.2 There is a strict prohibition to any income or property distributions to the Company members or the payment of fees to its directors; and

5.3 Any payment made directly or indirectly to members as bona fide compensation for services rendered or reimbursement of expenses properly incurred on behalf of the Company, must be approved by the directors, the details to be appropriately recorded into the Company's records.

#### **6. Membership**

##### **6.1 Eligibility**

Membership will be open to individuals and organisations who support the objects of the Company and agree to be bound by this Constitution and any by-laws made under it.

##### **6.2 Classes of Membership**

The Board may establish and define classes of membership, including but not limited to:

- a) Ordinary Members
- b) Organisational Members
- c) Honorary Members
- d) Associate Members.

##### **6.3 Rights and Obligations**

- a) Members will have such rights and obligations as determined by the Board, including voting rights where applicable.
- b) Members will uphold the Company's Code of Ethics and act in accordance with its values and mission.



#### 6.4 Termination

Membership may be terminated:

- a) By written resignation
- b) For non-payment of fees
- c) By resolution of the Board for conduct inconsistent with the Company's objects or Code of Ethics.

#### **7. Liability of Members**

Each member undertakes to contribute an amount not exceeding ten dollars (\$10) to the assets of the Company in the event of its winding up while they are a member or within one year of ceasing to be a member.

#### **8. Governance**

##### 8.1 Board of Directors

- a) The Company will be governed by a Board comprising not fewer than three (3) and not more than ten (10) directors.
- b) Directors must be natural persons and members of the Company.

##### 8.2 Appointment and Tenure

- a) Directors will be elected by the members at the Annual General Meeting (AGM).
- b) Directors may hold office for a term of three (3) years and will be eligible for re-election.

##### 8.3 Powers and Duties

- a) The Board will manage and control the affairs of the Company and may exercise all powers of the Company not required to be exercised by members in general meeting.
- b) Directors will act in good faith, in the best interests of the Company, and with due care and diligence.

##### 8.4 Office Bearers

The Board will appoint from among its members the following office bearers:

- a) Chair
- b) Deputy Chair
- c) Secretary
- d) Treasurer.



## **9. Meetings**

### **9.1 General Meetings**

- a) An AGM must be held within five (5) months of the end of each financial year.
- b) Special General Meetings may be convened by the Board or upon written request of not less than ten percent (10%) of voting members.

### **9.2 Board Meetings**

- a) The Board must meet at least quarterly.
- b) Decisions will be made by majority vote; the Chair will have a casting vote in the event of a tie.

### **9.3 Quorum**

- a) The quorum for general meetings will be at least 50% of the voting members.
- b) The quorum for Board meetings will be a majority of directors.

## **10. Financial Management**

- a) The financial year of the Company will end on 30 June.
- b) The Company must maintain proper financial records and prepare annual financial statements.
- c) The accounts must be audited in accordance with applicable law.
- d) The Treasurer must oversee financial reporting and compliance.

## **11. Ethics and Conduct**

- a) All members and directors must adhere to the Company's Code of Ethics.
- b) The Board may establish an Ethics Committee to investigate alleged breaches and recommend disciplinary action.

## **12. Indemnity and Insurance**

- a) To the extent permitted by law, the Company must indemnify its directors and officers against liabilities incurred in good faith in the performance of their duties.
- b) The Company may procure directors' and officers' liability insurance.

## **13. Amendment of Constitution**

This Constitution may be amended by special resolution passed by at least seventy-five percent (75%) of members present and voting at a general meeting.

## **14. Winding Up**

Upon winding up or dissolution of the Company, any surplus assets shall be transferred to another not-for-profit entity with similar objects, and which is not carried on for the profit or gain of its members.



## Annexure 4 – Training Framework

### Executive Summary

This submission recommends the implementation of a nationally regulated, competency-based training and accreditation framework for all individuals and organisations delivering veterans' advocacy services. At the outset, it is acknowledged that while a minimum baseline of foundational knowledge is essential, the majority of training will occur on the job. The mechanism for delivering this practical training will be determined by individual firms. However, efforts will be directed towards harmonising training standards through a nationally accredited framework. This approach ensures that there is no undue burden on resources, while preserving firm-level autonomy in training delivery.

The proposed framework aims to replace the outdated Advocacy Training and Development Program (ATDP) with a unified, fit-for-purpose system that directly addresses longstanding policy, capability, and structural gaps within the sector. It ensures consistency, continuity, and quality of advocacy support, regardless of service provider or delivery model.

By embedding a regulatory foundation and professional standards, the framework introduces:

- **Tiered accreditation pathways** aligned to the complexity of roles and scope of service,
- **Specialist training modules** targeting complex and currently unregulated claim areas, including Retrospective Medical Discharge (RMD) and Commonwealth Superannuation Corporation (CSC) entitlements,
- **Mandatory Continuing Professional Development (CPD)** to ensure advocates maintain current knowledge and practice, enabling the sector to uphold quality standards and regulatory obligations,
- And a **regulatory model** overseeing training delivery, accreditation of practitioners, compliance, and sector-wide quality assurance.

Importantly, the framework supports both free and fee-for-service advocacy models, promoting national consistency and professionalisation without constraining how individual organisations operationalise training.

In conclusion, while a baseline knowledge requirement is necessary, the framework recognises that most learning occurs through practical experience, with delivery mechanisms determined by each firm. This structure provides flexibility for providers



while ensuring that all individuals engaged in veterans' advocacy are trained to an appropriate standard. Through harmonisation with the accredited framework, the system will uphold the overarching objective: that anyone acting in an advocacy capacity is suitably prepared and resourced to prioritise the veteran and their interests above all else.

## Purpose

### Expanded Purpose Statement

The purpose of this framework is to establish a legislatively supported, nationally consistent training and accreditation system that ensures all individuals providing advocacy services to veterans meet a clearly defined and enforceable standard of competence, conduct, and care. This is essential to address increasing system complexity, evolving legal obligations, and the diverse needs of contemporary veterans and their families.

Specifically, the framework is designed to achieve the following:

#### 1. High-Standard, Case-by-Case Advocacy

The framework ensures that every veteran receives individualised, evidence-based, and context-specific support, regardless of the advocate or organisation they engage with. By implementing a structured, tiered training model, the framework:

- Promotes consistent interpretation and application of legislation, including MRCA, DRCA, VEA and related instruments,
- Standardises assessment of eligibility, evidence, and entitlements across different service providers,
- Reduces variability and misinformation that can lead to claim delays, rejections, or appeals.

This will drive better outcomes for veterans and build confidence in the advocacy process.

#### 2. Fulfilment of Legal, Ethical, and Trauma-Informed Obligations

Veterans' advocates often support clients dealing with complex trauma, mental health conditions, and historical injustices. Many are also navigating sensitive or life-altering decisions about their compensation, identity, or post-service future.

The framework embeds training on:

- Trauma-informed service delivery, including cultural safety for Aboriginal and Torres Strait Islander veterans,



- Ethical obligations such as confidentiality, conflict of interest, and fair fee-for-service practices,
- Legal literacy, ensuring advocates understand their roles, limits, and responsibilities in interpreting policy, lodging claims, and managing appeals.

In doing so, the framework safeguards veteran wellbeing, procedural integrity, and system trust.

### **3. Support for Complex, Specialist Claim Types (e.g., CSC and RMD)**

Current training pathways do not sufficiently address complex claim types that carry significant financial and legal implications, such as:

- Retrospective Medical Discharge (RMD) claims, often linked to untreated service-related injuries or administrative oversights,
- Commonwealth Superannuation Corporation (CSC) entitlements, which require deep understanding of superannuation law, employment impact, and rehabilitation obligations.

By formally incorporating these domains into a specialist stream, the framework ensures that veterans with complex and high-stakes claims are no longer left unsupported or subject to unqualified representation.

### **4. Equitable Access to Qualified Advocates Across Service Models**

Veterans currently engage with a diverse advocacy landscape, including:

- Volunteer-based ex-service organisations (ESOs),
- Emerging fee-for-service (FFS) advocacy businesses,
- Private legal providers and hybrid support models.

This diversity, while beneficial, has contributed to uneven standards, lack of accountability, and limited transparency.

This framework introduces nationally recognised credentials and continuing professional development requirements that apply to all service providers ensuring that:

- Every advocate is subject to the same competency, conduct, and quality expectations,
- Veterans can identify and verify the qualifications of their advocate,
- The system supports consumer protection, regardless of whether advocacy is provided voluntarily or for a fee.



This positions the advocacy sector as a professional, accountable, and integrated extension of the veterans' support system, aligned with community expectations and the strategic goals of the Department of Veterans' Affairs.

## Policy Problem (Evidence-Based)

### 1. Outdated Training and Insufficient Scope

- The ATDP (formerly TIP) was redeveloped in 2015–16, yet its single-pathway design has not evolved to reflect recent legislative, technological, and trauma-informed practice developments (RSL Victoria, [web.atdp.org.au](http://web.atdp.org.au)).
- Stakeholder reports and even the Department's own operational handbooks highlight the need for program renewal to meet contemporary standards (Department of Veterans' Affairs).

### 2. Lack of National Regulation and Quality Oversight

- While ASQA accreditation exists for the 11019NAT Course, the ATDP currently applies only to volunteer advocates affiliated with ESOs, without oversight for paid or private providers (Department of Veterans' Affairs).
- There is no independent, national regulatory body to ensure uniform standards or to audit advocate performance and service quality. This has driven the creation of the National Association for Veteran Advocacy. ([web.atdp.org.au](http://web.atdp.org.au)).

### 3. Exclusion of Paid (Fee for Service) Providers

- The ATDP restricts access to advocates nominated by ESOs offering free services; commercial providers are explicitly excluded ([web.atdp.org.au](http://web.atdp.org.au)).
- RSL NSW warns veterans are increasingly turning to unregulated, fee-for-service advocates posing risks of exploitation and inconsistent quality (APDR).

### 4. Inadequate Training on Specialist Claims (CSC, RMD)

- No module in the current ATDP addresses the Commonwealth Superannuation Corporation (CSC) entitlements or the complex Retrospective Medical Discharge (RMD) submissions, leaving critical gaps in advocate capability (Department of Veterans' Affairs).

### 5. Absence of Accountability, Ongoing Development, and Consumer Protection

- Although annual CPD is mentioned, there is limited structure governing mandatory maintenance, re-accreditation, or consequences for misconduct ([web.atdp.org.au](http://web.atdp.org.au)).





- Legacy Australia emphasises the absence of formal complaints, discipline, or malpractice processes under the current ATDP or proposed IVA model (Department of Veterans' Affairs).

## Resulting Harms

- Mishandled or misrepresented cases: RSL NSW reports that volunteer shortages and unregulated fee-driven advocates have contributed to misinformation and poorer outcomes for veterans (APDR).
- Ethical breaches and exploitation: RSL NSW flags fee-for-service providers charging commissions as “fundamentally at odds with equitable access,” with limited recourse under current arrangements (APDR).
- Cybersecurity and record-keeping risks: Internal documentation indicates ATDP lacks centralised oversight or standards for digital security raising confidentiality and national-security concerns.
- Community mistrust and poor veteran outcomes: External submissions underscore stakeholder concerns about the long-term viability and safety of the current advocacy system (RSL Victoria).

The evidentiary record confirms that the existing ATDP framework is outdated, incomplete, and lacking critical oversight. The rise of commercial advocacy, exclusion of paid providers, and gaps in specialist claim support demand a regulated, accountable, and nationally consistent framework that safeguards veterans and enhances service quality.

## Proposed Solution

To address the systemic shortcomings identified in the current advocacy environment, this submission recommends the establishment of a nationally consistent, legislatively supported training and accreditation framework, administered by National Association for Veteran Advocacy (NAVA), or its affiliated parties.

This solution is designed to create a unified, accountable, and professionalised advocacy sector that upholds the legal, ethical, and trauma-informed standards expected in veterans' support services.

## Key Features of the Proposed Framework

- **Tiered Competency Model**  
A structured accreditation pathway from foundational training through to complex representation (e.g., Veterans Review Board and Administrative Appeals



Tribunal), ensuring that all advocates operate within the scope of their demonstrated competencies.

- **Specialist Training Streams**

Targeted modules for high-impact, complex claim types, including Retrospective Medical Discharge (RMD) and Commonwealth Superannuation Corporation (CSC) entitlements, to address critical capability gaps in the current system.

- **National Curriculum and Assessment Standards**

A formally endorsed curriculum featuring evidence-based learning, real-world case simulations, and legislation-aligned content, assessed through written and scenario-based methods with a required 100% competency threshold.

- **Accreditation and Reaccreditation Requirements**

Advocates will be required to undergo initial and annual assessments to maintain their accreditation, ensuring ongoing proficiency and alignment with legislative updates and policy changes.

- **Mandatory Continuing Professional Development (CPD)**

Ongoing education requirements tailored to each accreditation level, with a strong emphasis on:

- Trauma-informed care
- Mental health literacy
- Ethical obligations and consumer safeguards
- Cybersecurity and digital record-keeping

- **Inclusive of All Advocacy Models**

The framework will apply to both free and fee-for-service providers, ensuring universal standards across the sector and closing existing regulatory gaps that have allowed inconsistencies in service quality.

- **Independent Oversight (NAVA) and Central Registry**

A dedicated regulatory function to oversee:

- Accreditation and provider compliance
- Investigation of misconduct or consumer complaints
- Maintenance of a publicly accessible registry of qualified advocates

In addition to this proposed framework, the fee-for-service sector will play a critical role in supporting the broader advocacy ecosystem. Initiatives under consideration include:

- Offering pro bono advocacy training to Ex-Service Organisations (ESOs)
- Providing resources to ESOs at no or reduced cost through subscription or donation models
- Supporting pathways for advocates to transition between voluntary and paid roles as their circumstances change



- Expanding on-the-job training opportunities to strengthen the skills of professional and volunteer advocates alike

TABLE 1: SUMMARY TABLE: OPTIONS COMPARISON

Criteria	Option 1: Current State	Option 2: Reform ATDP under DVA	Option 3: National Framework with National Association for Veteran Advocates
Regulatory Coverage	X None	● Partial (within DVA)	✓ Comprehensive, independent
Inclusion of FFS Providers	X Excluded	● Possible but unclear	✓ Included
Specialist Claims (RMD, CSC)	X Not addressed	● May be added	✓ Fully embedded in curriculum
Oversight & Accountability	X Absent	● Department-led	✓ Independent regulator
Sector Confidence & Trust	X Low	● Moderate	✓ High
CPD & Reaccreditation	X Not enforced	● Inconsistent	✓ Mandatory, standardised
Trauma-Informed Practice	X Not embedded	● Limited	✓ Required training across all levels
Feasibility	✓ High	● Moderate	● Moderate with strong return
Long-Term Sustainability	X Poor	● Average	✓ Strong foundation for future growth

The analysis supports Option 3: Establishing a legislated, nationally consistent framework with independent regulation as the most effective, equitable, and sustainable solution. It responds to the growing complexity of veterans' needs, addresses critical gaps in current service models, and ensures the protection and empowerment of all who have served.

Pros of establishing a legislated nationally accredited framework:

- Delivers system-wide standardisation, equity, and quality assurance.
- Ensures all veterans, regardless of provider, receive competent, ethical, trauma-informed support.
- Enables training in complex claim areas (e.g., CSC, RMD).
- Strengthens consumer protection through clear complaints and audit pathways.
- Improves public confidence, data integrity, and interoperability with DVA.



## Competency Framework

To ensure safe, effective, and consistent delivery of veterans' advocacy services, the following tiered competency structure is proposed. Each level defines the scope of authorised practice and is linked to nationally prescribed training, competency-based assessment, and practical casework experience.

TABLE 2: COMPETENCY FRAMEWORK

Level	Role Title	Scope of Practice
Level 1	Foundation / Admin Support	General understanding of advocacy systems, client intake, referral protocols, and administrative support functions.
Level 2	Trainee Advocate	Assists with case preparation and client engagement under supervision; not authorised to lodge claims independently.
Level 3	Authorised Advocate	Prepares, lodges, and manages standard DVA claims (liability, compensation, treatment, incapacity) independently.
Level 4	Senior Advocate	Manages complex cases including Veterans' Review Board (VRB) appeals and secondary reviews. Provides mentorship to junior advocates.
Level 5	AAT Advocate	Prepares and represents clients before the Administrative Appeals Tribunal (AAT). Demonstrated legal literacy and advanced advocacy skills required.
RMD Specialist	CSC/RMD Specialist Stream	Optional stream for advanced advocates. Prepares and manages Commonwealth Superannuation Corporation (CSC) claims and Retrospective Medical Discharge (RMD) submissions. Anyone of any level may be able to be an RMD Specialist.

Each level requires:

- Completion of prescribed training modules via a nationally accredited provider,
- Demonstrated workplace experience (minimum case thresholds),
- A formal assessment process (written, oral, and/or scenario-based),
- Annual reaccreditation and continuing professional development.



TABLE 3: VETERANS' ADVOCACY COMPETENCY MATRIX

Level	Role	Scope of Practice	Required Training Units	Assessment Method	Practical Experience (Minimum)	Annual CPD
1	Foundation / Admin Support	General understanding of DVA systems, client referral, and admin support	ADV001 – What is Advocacy ADV002 – Advocacy Principles PROF102 – Recordkeeping DVA101 – Overview of DVA	Knowledge quiz	N/A	10 pts (ethics + systems)
2	Trainee Advocate	Prepares cases under supervision; not authorised to lodge	All Level 1 units + MRCIL01 – MRCA Liability (Basic) COMP301 – Economic vs Non-Economic Loss INCS101 – Incapacity (Basic)	Written + Verbal scenario	Observe 5 cases Assist in 3 case preps	20 pts (trauma + ethics)
3	Authorised Advocate	Manages and submits claims independently	All Level 2 units + MRCIL02 – MRCA Liability (Advanced) DXEV001 – Medical Evidence COMP302 – PI (Basic) INCS201 – Incapacity (Advanced) NF101, NF102, VET301	Written exam Scenario assessment Supervisor review	Submit 10 liability claims Submit 5 comp claims Min. 5 client interviews	30 pts (trauma-informed + legal)



4	Senior Advocate	Handles complex cases and VRB appeals	All Level 3 units + VRB101 – VRB (Basic) VRB102 – VRB (Advanced) COMP303 – PI (Advanced) VET302 – Vicarious Trauma	Case simulation Verbal legislative interpretation Portfolio review	Represent 3 VRB matters Lead 5 claims Mentor 1 trainee	40 pts (appeals, supervision, ethics)
5	AAT Advocate	Represents clients at AAT	All Level 4 units + AAT101 – AAT Representation (TBC) PROF103 – Advanced Legal Communication	Written tribunal brief Mock AAT hearing Peer review	Represent 2 AAT matters Review 5 determinations	50 pts (law, ethics, supervision)
RMD Specialist	CSC/RMD Specialist	Prepares CSC/RMD submissions	RMD401 – RMD Advocacy RMD402 – CSC Entitlements	Written case study Evidence collation exercise	Submit 2 RMD claims Review 2 CSC cases	20 pts (superannuation, disability)

**Notes:**

- CPD Points: May include ethics, trauma care, cybersecurity, treatment literacy, and relevant workshops.
- Assessment: Should be overseen by a certified assessor within or appointed by the regulating body.
- Practical Experience: Verifiable through client records, supervisor attestation, or formal OJT logs.

**Accreditation Process**

To ensure veterans receive safe, consistent, and high-quality advocacy support, all individuals seeking formal recognition under the Veterans’ Advocacy Training and Accreditation Framework must undergo a multi-stage accreditation process aligned to their competency level. This ensures that accreditation is earned through merit,



demonstrated skill, and practical experience, and is maintained through continuous professional development.

### **Assessment Components**

Each accreditation level requires successful completion of the following components, appropriate to the level of complexity and responsibility:

<b>Component</b>	<b>Purpose</b>
1. Written Examination	Tests knowledge of relevant legislation (e.g., MRCA, DRCA, AAT Act), advocacy ethics, and trauma-informed service delivery.
2. Scenario-Based Oral Exam	Simulates real-world casework to assess the candidate's ability to interpret policy, communicate with clients, and apply legal reasoning under pressure.
3. Evidence Portfolio	Submission of written materials including case notes, correspondence, claims prepared, and example recommendations to demonstrate procedural knowledge and documentation skills.
4. Supervised Casework Log	Verified record of active participation in case handling under mentor supervision, tailored to level requirements (see Competency Matrix).
5. Independent Panel Review	Final review conducted by a panel of accredited assessors or regulatory board members to determine readiness for certification or progression.

### **Accreditation Validity and Renewal**

- Accreditation is valid for 12 months from the date of issue.
- Ongoing certification is contingent upon:
  - Compliance with annual CPD requirements,
  - Evidence of continued active practice,
  - Adherence to the Code of Ethics and Conduct,
  - No substantiated complaints or breach investigations pending.
- Advocates who fail to maintain CPD or who do not meet reaccreditation requirements may have their status suspended or downgraded until requalification is achieved.

### **Reaccreditation Process**

- Annual review requires submission of:
  - Updated CPD log and certificates,





- A reflective practice statement (detailing service learning and case trends),
- Optional resubmission of case materials where regulation or law has changed materially.
- High-risk or specialist areas (e.g., AAT representation, RMD claims) may require a biennial reassessment including refresher modules or updated scenario testing.

## Continuing Professional Development (CPD) Requirements

To maintain accreditation and ensure continued professional competency, all accredited veterans' advocates must meet annual CPD obligations aligned to their certification level. The CPD program ensures advocates stay up to date with legislative changes, ethical standards, trauma-informed practice, and sector-specific developments.

### Annual CPD Point Requirements by Accreditation Level

Level	Minimum CPD Points	Required Inclusions
<b>Level 1 – Foundation/Admin Support</b>	10 points	- Ethics and integrity- Department of Veterans' Affairs systems overview
<b>Level 2 – Trainee Advocate</b>	20 points	- Trauma-informed care principles- Mental health awareness- Client engagement techniques
<b>Level 3 – Authorised Advocate</b>	30 points	- Legislative and procedural updates (e.g., MRCA/DRCA)- Case law reviews- Cybersecurity and privacy protocols
<b>Level 4 – Senior Advocate</b>	40 points	- Appeals processes (VRB, AAT)- Supervision and mentoring practices- Governance and sector accountability- Advanced mental health literacy
<b>RMD Specialist – Additional Requirement</b>	+10 points (in addition to primary level)	- Superannuation law refreshers- CSC claims case updates- RMD advocacy workshops

Note: Points are cumulative and must be documented annually as a condition of reaccreditation.

Note: This is an example of points structure

### Approved CPD Topics and Activities

The following topics are pre-approved for CPD purposes. Custom courses may be recognised upon submission to the regulatory body for review.



Category	Examples
<b>Ethical &amp; Professional Conduct</b>	- Code of conduct training- Conflict of interest workshops
<b>Trauma-Informed &amp; Mental Health Literacy</b>	- Mental Health First Aid- Working with Vulnerable Clients- Vicarious Trauma Awareness
<b>Veterans' Systems &amp; Services</b>	- DVA Portal updates- Veterans' Transition Services overview- ESO and community referral pathways
<b>Legal &amp; Procedural Updates</b>	- Case Law Review (MRCA, DRCA, SRCA)- Administrative Appeals Tribunal processes- RMD and CSC legislation changes
<b>Cybersecurity &amp; Data Integrity</b>	- Information security compliance- Client recordkeeping standards- Privacy and FOI obligations
<b>Supervision &amp; Mentoring (Levels 3–5)</b>	- Supervisor development training- Performance review processes- Mentoring and onboarding junior advocates

### CPD Submission and Recordkeeping

- CPD activities must be logged in the advocate's annual accreditation file using a standard CPD log template.
- Supporting documentation (e.g. attendance certificates, completion emails, reflection logs) must be retained for audit purposes.
- CPD logs may be requested by the regulatory body at any time and are reviewed during the annual reaccreditation process.

### Compliance and Sanctions

- Failure to meet the minimum CPD requirement within the calendar year may result in:
  - Temporary suspension of accreditation,
  - Downgrade of competency level,
  - Requirement to complete remediation training.
- Extensions may be granted under exceptional circumstances upon application.

### Regulatory Structure

To ensure the integrity, quality, and accountability of veterans' advocacy services, it is essential to establish a dedicated regulatory authority or designate an existing body with an expanded remit to oversee the national training and accreditation framework. This regulatory structure will serve as the cornerstone for professional standards, consumer protection, and continuous sector improvement.



## **Core Responsibilities of the Regulatory Authority**

### **1. Accreditation of Training Providers and Assessors**

- Evaluate and formally accredit educational institutions and training organisations delivering veterans' advocacy courses.
- Set and monitor standards for trainers and assessors to ensure consistency and competency in instruction and evaluation.
- Review and approve curriculum updates to align with legislative changes, emerging best practices, and sector needs.

### **2. Maintenance of a National Advocate Register**

- Operate and maintain a secure, publicly accessible register of accredited advocates, detailing current certification status and scope of practice.
- Provide real-time updates on accreditation status, suspensions, or disciplinary actions to ensure transparency for veterans and service providers.
- Facilitate data interoperability with the Department of Veterans' Affairs (DVA) and other relevant agencies to support referral pathways and compliance monitoring.

### **3. Investigation of Misconduct and Unsafe Practice**

- Receive and assess complaints regarding advocate conduct, competence, and ethical breaches.
- Conduct formal investigations and hearings following due process principles, ensuring fairness and confidentiality.
- Liaise with external agencies (e.g., legal bodies, Ombudsman) when appropriate for complex or criminal matters.

### **4. Enforcement of Ethical Standards and Retraining Obligations**

- Define and enforce a robust Code of Ethics and Conduct for all accredited advocates.
- Implement disciplinary measures including warnings, suspension, or deregistration in cases of misconduct.
- Mandate retraining or remediation programs for advocates who fail to meet ongoing competency or ethical standards.
- Oversee annual reaccreditation processes, ensuring compliance with continuing professional development (CPD) requirements.

### **5. Publication of Public Guidance and Best Practice Updates**

- Develop and disseminate authoritative resources, guidance notes, and sector bulletins to keep advocates informed of legislative changes, case law developments, and emerging trauma-informed practices.



- Organise regular workshops, webinars, and conferences to foster community, knowledge sharing, and innovation within the advocacy sector.
- Engage with veteran groups, legal professionals, and policy makers to ensure training and regulatory frameworks remain responsive and effective.

### **Governance and Accountability**

- The regulatory authority should be established with a clear legislative mandate defining its powers, responsibilities, and reporting obligations.
- It should operate independently from government departments to maintain impartiality, while maintaining strategic collaboration with entities such as DVA, the Institute of Veterans' Advocates (IVA) and NAVA.
- A governing board, including representation from veterans' organisations, legal experts, mental health professionals, and advocate representatives, should oversee the authority's activities.
- Transparent annual reporting to Parliament or an appropriate oversight committee will ensure public accountability and sector confidence.

### **Benefits of a Dedicated Regulatory Structure**

- Ensures a consistent and high standard of advocacy across all providers and service delivery models.
- Protects veterans by guaranteeing advocates are properly trained, ethical, and accountable.
- Builds trust and confidence within the veteran community and wider public.
- Supports data-driven policy making through centralized registration and complaint data.
- Promotes a culture of continuous improvement, professionalism, and innovation within the advocacy sector.



## Implementation Strategy

A phased, consultative, and adaptive approach is essential to ensure the successful adoption of the new Veterans' Advocacy Training and Accreditation Framework. This multi-stage strategy is designed to balance timely implementation with meaningful stakeholder engagement, system and organisational readiness, and ongoing quality improvement. Crucially, the transition to the new framework will be introduced with sufficient lead time and flexibility to ensure advocacy firms are not negatively impacted in their ability to continue providing services to veterans or in terms of available resources. This approach ensures continuity of support for veterans while allowing advocate organisations to adapt progressively and sustainably.

### **Phase 1 – Development & Consultation (0–6 Months)**

#### **Objectives:**

- Secure sectors buy-in through comprehensive stakeholder engagement.

#### **Key Activities:**

- Develop detailed training content, learning outcomes, and assessment tools for all competency levels and specialist streams.
- Consult with key partners including Ex-Service Organisations (ESOs), advocacy groups, legal experts, veteran representatives, and mental health professionals to validate framework design and address practical considerations.
- Build and test an online Learning Management System (LMS) to host training materials, assessments, and accreditation workflows. There is also the potential to add an advocacy portal whereby DVA and Advocates can utilise the same system which in turn creates unity amongst the pair.
- Produce supporting materials such as trainer manuals, candidate guides, and accreditation process documentation.

#### **Deliverables:**

- Approved curriculum and assessment package.
- Stakeholder feedback report.
- Functional LMS prototype.

### **Phase 2 – National Rollout (6–18 Months)**

#### **Objectives:**

- Seamlessly transition from the existing Advocacy Training Development Pathway (ATDP) to the new framework.
- Establish the accreditation process and national advocate registry.
- Launch initial specialist training streams.



**Key Activities:**

- Identify and transition existing ATDP candidates and advocates to appropriate competency levels within the new framework.
- Open formal accreditation application intake and process initial candidates.
- Develop and launch a secure, searchable national advocate register accessible by veterans, providers, and regulators.
- Pilot the Retrospective Medical Discharge (RMD) specialist training to validate content and delivery modalities.
- Deliver train-the-trainer programs to equip educators with new curriculum expertise.

**Deliverables:**

- Active advocate registry.
- Accredited cohort of advocates under the new system.
- Pilot evaluation report and framework refinements.
- LMS fully operational at scale.

**Phase 3 – Regulatory Integration and Continuous Improvement (Ongoing)**

**Objectives:**

- Embed CPD management and accreditation renewal processes.
- Maintain a responsive, evolving training and accreditation system that reflects sector and legislative changes.

**Key Activities:**

- Implement an annual CPD monitoring and enforcement system aligned to accreditation renewal cycles.
- Conduct regular reviews of curriculum, assessments, and competency standards to reflect changes in law, policy, and veteran needs.
- Establish a performance evaluation loop, gathering user feedback from advocates, trainers, and veterans to inform system improvements.
- Maintain active engagement with stakeholders via workshops, updates, and sector forums.
- Publish periodic best practice guides and regulatory updates.

**Deliverables:**

- Annual CPD compliance reports.
- Updated curriculum reflecting current best practices.
- Ongoing stakeholder engagement summaries.
- Enhanced advocate performance and veteran satisfaction metrics.



## Governance and Oversight

A dedicated implementation committee comprising representatives from government, veterans' advocacy groups, education providers, and regulatory bodies should oversee each phase, ensuring milestones are met and risks managed effectively.

## Cost, Benefit Analysis

The introduction of a nationally regulated, competency-based veterans' advocacy framework represents a strategic investment in improving service delivery, strengthening professional standards, and protecting both the veteran community and the Commonwealth. While upfront costs are required, the long-term social, economic, and institutional benefits significantly outweigh the initial and ongoing expenditures.

### COSTS

Category	Description	Estimated Considerations
<b>Curriculum Development</b>	Commissioning legal, advocacy, trauma, and veterans' affairs experts to design fit-for-purpose training and assessment materials.	One-time development fee + future review cycles
<b>LMS Build &amp; Integration</b>	Establishment of a secure, accessible Learning Management System with SCORM-compliant content, assessment tools, and tracking features.	Platform development, hosting, cybersecurity, accessibility compliance
<b>Regulatory Framework</b>	Creation or expansion of a regulatory authority to accredit, monitor, and enforce national standards. Includes staffing, registry, case management, legal compliance, and audit functions.	Initial setup + ongoing operational costs
<b>Trainer and Assessor Upskilling</b>	Delivery of train-the-trainer programs to prepare educators and mentors in new materials.	Per trainer certification and refreshers
<b>Stakeholder Engagement &amp; Change Management</b>	Sector-wide consultation, transition support, communication strategies, and advisory working groups.	Communications, facilitation, reporting
<b>CPD Administration</b>	System for tracking, validating, and auditing CPD compliance annually across all accredited advocates.	Integration with LMS + staffing support
<b>Monitoring &amp; Evaluation</b>	Ongoing framework evaluation, audit reviews, and continuous improvement mechanisms.	Annual review budget and third-party evaluations





## BENEFITS

Category	Impact	Supporting Evidence
<b>Improved Veteran Outcomes</b>	More accurate, consistent, and timely advice leads to better health, rehabilitation, compensation, and wellbeing outcomes for veterans and their families.	Case data from DVA and VRB show poor advocacy increases claim rejection and appeal rates.
<b>Reduced Legal and Financial Risk to the Commonwealth</b>	Ensures claims are submitted competently and ethically, reducing appeals, litigation, and liability related to maladministration or unethical practice.	Legal challenges and AAT backlogs impose significant costs on DVA and related agencies.
<b>Professionalisation of the Sector</b>	Establishes clear entry standards, career progression, and accountability mechanisms, lifting the reputation and function of the advocacy profession.	Aligns with expectations across legal, health, and education sectors.
<b>Ethical and Trauma-Informed Practice</b>	Ensures vulnerable veterans are supported by advocates who are trained to manage trauma, mental health, and confidentiality appropriately.	Reduces risk of re-traumatisation and secondary harm.
<b>Sector-Wide Consistency and Regulation</b>	All veterans—regardless of location or service provider—receive support from individuals who meet consistent national standards.	Addresses geographic and organisational inequality in advocacy outcomes.
<b>Supports Free and Fee-for-Service Models</b>	Expands safe access to both traditional ESO pathways and regulated private service providers, broadening support networks.	Responds to market shifts and unmet need in underserved regions.
<b>Alignment with Public Service and Defence Values</b>	Embeds principles of integrity, fairness, accountability, and service into a civilian model that supports former ADF members.	Upholds the public service ethos in veteran care.

While the initial costs associated with development, regulatory establishment, and rollout are measurable, the intangible and ongoing benefits, including reduced system strain, better legal outcomes, veteran safety, and reputational assurance are significant.

This initiative delivers value across:

- **Social impact** (supporting vulnerable veterans),
- **Operational efficiency** (fewer errors and escalations),
- **Financial protection** (from claims mismanagement), and
- **Institutional trust** (through transparent regulation).

*Recommendation: Proceed with phased implementation, supported by public funding and Commonwealth endorsement, with regular economic evaluation checkpoints built into the governance framework.*



## Conclusion

As outlined in the Executive Summary, this proposal presents a transformative Veterans' Advocacy Training and Accreditation Framework designed to replace the outdated Advocacy Training Development Pathway (ATDP) with a nationally consistent, trauma-informed, and competency-based system. This framework directly addresses the critical policy, capability, and systemic gaps identified, ensuring that all veterans receive advocacy services that are accurate, ethical, and delivered to the highest professional standards.

By introducing tiered competency levels, specialist streams for complex claims such as Retrospective Medical Discharge (RMD) and Commonwealth Superannuation Corporation (CSC) entitlements, and mandatory continuing professional development, the framework establishes a clear pathway for professionalisation across the advocacy sector. The proposed regulatory structure provides essential oversight, accountability, and quality assurance mechanisms that safeguard both veterans and the integrity of the profession.

The phased implementation strategy, informed by extensive consultation and supported by modern learning management infrastructure, will enable a smooth transition from the existing system and broaden access to competent advocates nationwide. This approach balances operational pragmatism with strategic governance, fostering a trauma-informed, ethical, and highly skilled advocacy workforce.

Ultimately, this framework promises to deliver stronger outcomes for veterans and their families, reduce legal and reputational risks for the Commonwealth, and elevate the advocacy sector to align with public service values and expectations. It is a vital step towards ensuring that every veteran, regardless of where or how they seek assistance, is supported by qualified advocates equipped to navigate the complexities of their claims and wellbeing needs.



## **ATTACHMENTS**

- Appendix A: Glossary of Terms
- Appendix B: Competency Levels and Roles Template
- Appendix C: Accreditation Process
- Appendix D: CPD Register Template
- Appendix E: Stakeholder Consultation Summary Template



## Appendix A – Glossary of Terms

- **Advocacy Training Development Pathway (ATDP):** The previous framework for training veteran advocates, now outdated.
- **Commonwealth Superannuation Corporation (CSC):** Entity managing superannuation entitlements for Defence Force members.
- **Retrospective Medical Discharge (RMD):** Claims process for medical discharges applied retrospectively.
- **Learning Management System (LMS):** Online platform for delivering and managing training and assessments.
- **Veterans Review Board (VRB):** Tribunal reviewing veterans' claims decisions.



## Appendix B – Competency Levels and Roles Template

Level	Role	Scope of Practice	CPD Points Required (Annual)
1	Foundation / Admin Support	General knowledge of veteran advocacy systems	10
2	Trainee Advocate	Supports casework under supervision	20
3	Authorised Advocate	Manages standard claims independently	30
4	Senior Advocate	Handles complex reviews and Veterans Review Board cases	40
5	AAT Advocate	Represents veterans at Administrative Appeals Tribunal	40+
RMD Specialist	Specialist Stream	Manages Commonwealth Superannuation Corporation (CSC) & Retrospective Medical Discharge (RMD) claims	+10



### Appendix C – Accreditation Process Flowchart Template

Step	Description	Responsible Party	Notes
1	Candidate submits application with evidence of completed training	Candidate	Include prior qualifications
2	Written exam covering legislation, ethics, trauma-informed care	Assessment Panel / LMS System	Multiple choice / short answers
3	Scenario-based oral examination	Accreditation Panel	Roleplay and case handling
4	Submission of evidence portfolio (case files, correspondence, reports)	Candidate	Verify authenticity and completeness
5	Review of supervised casework log	Supervisor / Mentor	Confirm hours and scope of work
6	Formal panel assessment and decision	Independent Accreditation Panel	Approval, remediation, or rejection
7	Successful candidates registered and issued accreditation certificate	Regulatory Authority	Accreditation valid for 12 months
8	Annual CPD compliance verification	Regulatory Authority	Required for reaccreditation



### Appendix D – Continuing Professional Development (CPD) Log Template

Date	Activity Description	CPD Category	Points Earned	Supporting Evidence Attached? (Y/N)

*Examples of CPD Categories:*

- Trauma-Informed Care
- Legislative Updates
- Ethics & Professional Conduct
- Mental Health Awareness
- Cybersecurity Training
- Case Law and Appeals Process





## Appendix E – Stakeholder Consultation Summary Template

<b>Stakeholder Group</b>	<b>Date of Engagement</b>	<b>Method</b>	<b>Key Feedback / Issues Raised</b>	<b>Actions Taken</b>
Ex-Service Organisations (ESOs)		Workshop / Survey	Need for trauma-informed training, clearer accreditation pathways	Incorporated trauma modules, tiered levels
Veteran Advocacy Groups		Focus Group	Concerns about access in regional areas, paid provider inclusion	Developed online LMS, included all provider models
Legal Experts		One-on-one interviews	Complexity of RMD and CSC claims requires specialist training	Added specialist streams
Mental Health Professionals		Roundtable	Importance of vicarious trauma awareness and self-care	Added CPD modules on mental health