

SUBMISSION

05 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 on Issues Relating to Advocacy Services for Veterans Accessing Compensation and Income Support.

This submission is made by the Veterans, Emergency Services & Police Industry Institute of Australia (VESPIIA), Australia's first professional body dedicated to supporting those who deliver services and programs to veterans, first responders, and their families. Our work focuses on sector-wide improvement—strengthening the capability, consistency, and accountability of service delivery across health, wellbeing, transition, justice, and advocacy.

As part of our ongoing engagement with the advocacy sector, VESPIIA has consulted with a range of practitioners who work directly with veterans navigating the Department of Veterans' Affairs (DVA) compensation and income support systems. Their insights reflect thousands of hours of case work, often delivered without government funding or formal recognition.

We welcome this inquiry's intent to explore how advocacy services are delivered, where they fall short, and how they might be improved. The Royal Commission into Defence and Veteran Suicide made clear that the current system is inconsistent, fragmented, and at times harmful. Veterans and their families deserve better. In the absence of a unified model, a range of advocacy approaches have emerged—including fee-for-service, volunteer, and hybrid models—each with its own strengths and limitations.

VESPIIA does not endorse or oppose any particular service model. Instead, we assert that all forms of advocacy are valid, provided they are delivered ethically, transparently, and in the best interests of the veteran. The issue is not how an advocate is funded, but how they operate.

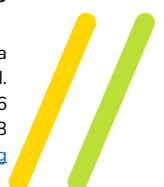
This submission outlines the conditions that gave rise to fee-for-service advocacy, highlights the existing professional standards already adopted by many providers, and identifies where additional safeguards and coordination are needed. VESPIIA recommends that any future reform be grounded in professional accountability, informed consent, and a shared commitment to quality outcomes, regardless of the delivery model.

We thank the Committee for the opportunity to contribute to this important work and stand ready to support the development of a fit-for-purpose system that prioritises veteran wellbeing, clarity, and competence across all advocacy pathways.

ABOUT VESPIIA

The Veterans, Emergency Services & Police Industry Institute of Australia (VESPIIA) stands as the pioneering professional body in Australia, uniquely crafted to champion the tireless efforts of those who support the backbone of our nation—Veterans, Emergency Services, Police, and their families. Serving as a dedicated bastion of support, VESPIIA provides initiatives designed to uplift the organisations, committed staff, and selfless volunteers who tirelessly deliver essential support and programs to the heroes in our communities.

At the heart of VESPIIA's mission is a comprehensive approach to advocacy, amplifying the sector's collective voice to influence positive change. The institute is a nexus of professional development, fostering



growth and expertise among those who dedicate themselves to service. Through a dynamic array of networking events, recognition programs, and the provision of vital resources, VESPIIA ensures that these pillars of support have the tools, knowledge, and networks required to excel in their critical roles.

More than a professional body, VESPIIA represents a continuum of service, recognising that supporting those who, in turn, support our service communities is an ongoing commitment. As the institute propels forward, it remains steadfast in its dedication to creating an ecosystem where the supporters of our nation's defenders receive the backing, they need to carry out their noble work effectively and with unwavering commitment. VESPIIA, at its core, is an instrumental force in fortifying the foundation of gratitude, support, and excellence upon which our service communities thrive.

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 reflects the lived experience and operational knowledge of fee-for-service practitioners and the oversight role of VESPIIA as a professional body.

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Advocacy services for veterans are delivered through a range of models, including volunteer, fee-for-service, and hybrid arrangements. While these models differ in structure and funding, they share a common purpose: helping veterans navigate complex compensation and support systems.

The emergence of paid advocacy is relatively recent in this space and has drawn scrutiny in some quarters. In any ecosystem where paid and unpaid service delivery coexist, questions around motivation, fairness, and accountability are expected. VESPIIA's position is that rather than focusing on how an advocate is paid, all providers should be assessed by the outcomes they deliver and the professional standards they uphold.

Current concerns about governance, oversight, and ethical conduct reflect a broader issue: the regulatory framework has not kept pace with the sector's evolution. Like many areas of emerging practice, professional norms and structures are forming faster than legislation or policy can adapt. This has created gaps in transparency, clarity, and coordination, gaps that present risk not only to veterans, but also to those trying to support them in good faith.

VESPIIA believes there is an opportunity to address these risks by formalising expectations around quality, ethics, and accountability across the advocacy sector. As a national professional body, VESPIIA recommends the establishment of a sector-wide advisory group — operating under appropriate governance, and supported by government and other key stakeholders — to explore the development of a self-regulatory framework for advocacy services.

This framework would not replace statutory regulation but could complement it by establishing clear, baseline expectations for:

- ethical practice, including transparency in service offerings and billing structures
- professional conduct, supported by a Code of Conduct and disciplinary pathways



- continuing professional development (CPD) aligned with national standards
- independent complaints mechanisms and governance structures

This work aligns with VESPIIA's existing functions as a membership-based body, including the provision of professional development and the maintenance of an enforceable Code of Conduct. These systems are already in place within the Institute and could be adapted to support a consistent, sector-wide approach to veteran advocacy.

Rather than prescribing who can provide advocacy or what they may charge, VESPIIA supports a model that prioritises informed consent, ethical service delivery, and transparency, so that all veterans, regardless of how they access support, can expect a consistent standard of care.

1. Introduction

A range of organisations, including ex-service organisations (ESOs), commercial providers, and independent practitioners, have made valuable contributions to this inquiry. Each brings a perspective shaped by their operational model, the communities they serve, and their experience navigating the Department of Veterans' Affairs system.

As a national professional body, VESPIIA takes a sector-wide view. We believe the future of advocacy should not be defined by funding models, but by the quality, safety, and accessibility of support available to veterans and their families.

Fee-for-service providers, volunteers, and ESO-based advocates each serve different veteran cohorts with different needs. A fit-for-purpose system must accommodate this diversity while setting shared expectations for transparency, accountability, and professional standards.

In our view, collaboration — not competition — must underpin the next phase of reform. With consistent training, a clear regulatory framework, and coordinated engagement between sectors, a mixed-service model can deliver better outcomes than any single approach in isolation.

2. Challenges Requiring Sector-Wide Reform

The challenges in veteran advocacy are not confined to any single delivery model. While discussion often centres on the role of commercial providers, many of the most pressing issues stem from the broader lack of coordinated standards, oversight, and system infrastructure across the entire advocacy ecosystem.

Drawing on the experience of our members, consultation across the sector, and the findings of recent inquiries including the Royal Commission into Defence and Veteran Suicide, VESPIIA has identified the following areas requiring urgent reform:

Lack of Regulation and Oversight

- No uniform professional standards
 - There is currently no mandatory accreditation or national professional framework governing advocacy practice. This has contributed to variability in service quality and gaps in accountability across all delivery models.
- Limited external accountability
 - In the absence of a clear complaints pathway or regulatory oversight body, veterans often have no independent mechanism to report misconduct or poor service, particularly outside of the ATDP framework.

Risks Within an Unregulated Commercial Environment

- Inconsistent business practices



- Without consistent standards, some providers operate without transparency around costs, referral arrangements, or service scope. This has created confusion among veterans and concern among stakeholders.
- Opaque billing structures
 - Fee arrangements, including contingency or commission-based models, are not consistently explained or documented. While VESPIIA does not believe pricing models should be regulated, we support a requirement for full and upfront disclosure of fees to ensure veterans can give informed consent.
- Limited visibility of operations
 - Some services appear to operate as Australian entities but conduct key functions offshore. This raises legitimate concerns around data privacy, governance, and informed consent — particularly where veterans are unaware their information is being handled outside Australian jurisdiction.

Concerns About Claims Quality and System Integrity

- Excessive or unsubstantiated claims
 - Some providers submit high volumes of duplicate, underdeveloped, or inappropriate claims, which slows processing and affects system integrity.
- Inconsistent approaches to impairment reporting
 - Practices such as resubmitting resolved conditions or overestimating functional impairment have been observed, placing unnecessary pressure on DVA processes and distorting veterans' expectations.

Medical Report and Referral Practices

- Vertically integrated models
 - Where advocacy services refer veterans to in-house or affiliated medical assessors, there is a risk of over-servicing and unnecessary testing. These practices can also increase veteran distress and reinforce illness-based identity.

Marketing and Communications

- Inappropriate advertising
 - Some marketing campaigns overstate outcomes, imply guaranteed results, or use language that preys on frustration, confusion, or urgency. This can mislead veterans and contribute to unrealistic expectations.

Digital Infrastructure and Access

- Outdated systems
 - The ESO Portal and MyService platform offer limited functionality for third-party advocates, restricting their ability to lodge, track, and manage claims efficiently and securely.
- Lack of secure access for recognised advocates
 - There is no formal system to verify advocates or provide secure, role-based access for authorised third parties, increasing the administrative burden on both veterans and DVA.

Access to Representation

- VRB representation limitations
 - Current Veterans' Review Board (VRB) procedures restrict legal representation, which some veterans feel limits their ability to engage effectively in complex or contested cases.

Decline in Volunteer Advocacy Availability

- Reduced ESO capacity
 - Many experienced volunteer advocates are retiring without formal succession planning or replacement. This has led to rising wait times and reduced access, particularly in regional areas.



- Mentor shortage
 - A growing gap between experienced mentors and new trainees has made it difficult to support skill development within the volunteer model.

Risk of Exploitative Practices

- Aggressive client targeting
 - Unregulated data collection, unsolicited contact, and unclear contract terms leave some veterans exposed to high-pressure or poorly understood service arrangements.
- Limited redress options
 - Once engaged, veterans may have few practical options to withdraw or challenge outcomes without financial penalty or system re-entry delays.

Impact on Veteran Wellbeing

- Over-pathologising
 - Models that prioritise compensation over recovery can unintentionally reinforce illness identity and delay reintegration and long-term wellbeing.
- Poor-quality advocacy leads to compounding harm
 - When advocacy is poorly delivered, it can trigger downstream consequences in housing, employment, mental health, and relationships — making it harder for veterans to access support and stability.

Under-Resourced Public Advocacy Support

- Stagnant funding
 - The Building Excellence in Support and Training (BEST) program has not received significant increases in funding since 2005, despite increased demand and case complexity.
- System strain
 - As workloads grow and funding remains flat, workforce attrition and gaps in service coverage are becoming more pronounced.

A Sector-Wide Need for Reform

These challenges are not isolated to any one service model, they reflect a fragmented, under-regulated system that lacks a shared standard of practice. VESPIIA recommends the establishment of a sector-wide working group, with participation from government, service providers, ex-service organisations, and independent practitioners, to explore the development of a national self-regulatory framework.

VESPIIA is well positioned to support this work. As a national industry body, our core functions include maintaining a professional Code of Conduct, delivering continuing professional development, and providing governance infrastructure that can be adapted to support the advocacy sector.

This work should not aim to eliminate diversity of delivery, but to ensure that all veterans — regardless of how they access support — receive ethical, competent, and transparent service. A coordinated framework, supported by all major stakeholders, will give veterans greater confidence, streamline DVA engagement, and create a stronger, more accountable advocacy sector.

3. Proposed Sector Reform Priorities

The current advocacy landscape lacks consistent structures for ethical oversight, training, and professional development. These gaps exist across all delivery models; volunteer, fee-for-service, and hybrid, and have contributed to confusion, system pressure, and inconsistent outcomes for veterans.

While some providers have introduced internal quality controls, the absence of sector-wide expectations has made it difficult to ensure consistent standards or safeguard vulnerable clients. At the same time, most



existing oversight mechanisms focus only on individual misconduct or funding administration, rather than forward-looking quality assurance.

As a national professional body with an established Code of Conduct and training mandate for its members, VESPIIA is well positioned to support the development of a sector-wide framework that promotes professional, ethical, and veteran-centred advocacy across all models.

To support this work, VESPIIA recommends the future establishment of a cross-sector working group, supported by government, advocates, ex-service organisations, legal experts, and veterans, to co-design shared tools, standards, and safeguards for the advocacy system.

Proposed Role of a National Working Group

A multi-stakeholder group tasked with recommending national standards for veteran advocacy. This group would advise on ethics, training, complaints handling, and systemic oversight. Its role would be consultative and coordinating, supporting both government-led and sector-driven reforms.

Code of Conduct for Veteran Advocates

A national code of conduct applicable to all advocates, regardless of funding model or affiliation. This would cover ethical conduct, conflicts of interest, client communication, informed consent, and data security. VESPIIA's member code could serve as a baseline for development in collaboration with other stakeholders.

Training and Continuing Professional Development

A national framework for training and CPD would ensure all advocates, paid or volunteer, have access to standardised pathways, competency-based progression, and ongoing professional learning. VESPIIA already provides training as part of its core operations and is well placed to support this work.

Guidelines for Service Delivery

Sector-wide guidelines could support best practice in client engagement, transparency, and boundary-setting, including clear communication, informed consent on fees and services, and prevention of over-servicing or misrepresentation.

Claim Preparation Protocols

To promote quality and reduce pressure on the system, advocates should be supported to prepare individualised, substantiated claims, rather than speculative or excessive lodgements. This would also reduce unnecessary medical referrals and support better outcomes for veterans.

A Collaborative Path Forward

This proposal does not call for the elimination of any one delivery model. Instead, it seeks to create consistent expectations for ethical conduct, quality control, and accountability across all forms of advocacy. VESPIIA recommends that this work be undertaken in partnership with DVA, the Institute of Veteran Advocacy (IVA), peak bodies, and relevant service providers.

This submission does not claim that these structures currently exist, nor that any single organisation should lead the process. It recommends a coordinated approach, one that reflects the diversity of advocacy services, and the high standards veterans should expect from all providers.

4. Proposed National Working Group on Veteran Advocacy Standards

VESPIIA recommends establishing a national working group to develop professional standards, improve oversight, and coordinate training across the veteran advocacy sector. While advocacy is currently delivered through a mix of volunteer, fee-for-service, ESO-based, and hybrid models, there is no shared framework for ethics, quality assurance, or coordinated sector development.

A formally recognised working group, formed under an independent structure, with representation from all key stakeholders, could help fill this gap. This group would not replace existing advocacy models or



constrain provider choice. Instead, it would act as a collaborative forum to strengthen consistency, improve service quality, and build shared infrastructure that benefits veterans and their families.

Proposed Scope and Purpose

The working group would aim to:

- Promote high-quality, ethical advocacy services that deliver better outcomes for veterans
- Contribute to more efficient claims processing and navigation of the DVA system
- Develop and support professional standards for advocates across all delivery models
- Advise on longer-term pathways to accreditation, disciplinary systems, and quality oversight
- Facilitate cross-sector collaboration between government, ESOs, community providers, and professional bodies

Proposed Governance Features

- Clear Terms of Reference
 - A focused remit on standards, ethics, training, and sector-wide collaboration
 - No operational delivery, case handling, or duplication of existing service roles
- Pathway to Recognition
 - Such a group may eventually inform future regulatory structures, subject to government direction — in partnership with DVA and other agencies — into a formal reference or governance body under future regulatory frameworks
- Inclusive Representation
 - Membership should reflect the diversity of the advocacy ecosystem, including:
 - Ex-service organisations (ESOs)
 - Fee-for-service or independent practitioners
 - Government representatives (e.g. DVA)
 - Veterans, family members, or carer advocates
 - Legal, privacy, or clinical experts as needed
- Structured Engagement with Government
 - Regular liaison with DVA and the Minister to ensure transparency and relevance
 - Practitioner-informed insights to support reform, policy development, and system design

VESPIIA's Role

As a professional body representing organisations and individuals who support veterans and first responders, VESPIIA is positioned to contribute to this effort. With existing governance systems, a national Code of Conduct, and established professional development infrastructure, VESPIIA can provide coordination or hosting support if requested.

Any future working group would need to be co-designed, consensus-based, and focused on outcomes, not institutional preferences. Its success would depend on cross-sector commitment to ethical service, professional standards, and veteran wellbeing.

Next Steps

Should the Committee or the Department of Veterans' Affairs consider this recommendation, VESPIIA would welcome the opportunity to support the design or establishment process. This model offers a practical and collaborative path to improved sector cohesion, increased transparency, and more consistent support for the veteran community.

5. Codes of Conduct

VESPIIA maintains a sector-wide Code of Conduct for its members, outlining standards for ethical behaviour, professionalism, and integrity across all roles and service types. This applies to individuals and organisations delivering support to veterans, first responders, and their families, including those working in advocacy, advisory, training, or service delivery roles.



To inform the development of a national framework for veteran advocacy, VESPIIA has prepared two supplementary draft documents that may be useful in guiding future conversations on ethical standards across the sector:

- A proposed Code of Conduct for members of any future governance or advisory group, establishing expectations for those engaged in sector reform and standards-setting
- A draft Veteran Advocacy Code of Conduct, designed as a potential baseline for all advocacy providers — including volunteer, fee-for-service, and hybrid models

These draft codes are aligned with VESPIIA's existing member conduct framework and are intended to:

- Support ethical, consistent service delivery across the sector
- Define clear professional boundaries and standards of behaviour
- Provide greater transparency and assurance to veterans engaging with advocacy services
- Offer a foundation for future accreditation, registration, or complaints-handling mechanisms

Both documents are available on request and may be refined through consultation with government agencies, service providers, and veteran communities. They are presented as working drafts to support a national conversation on quality, ethics, and trust in veteran advocacy.

6. Training and Competency Framework

The delivery of high-quality advocacy services relies on practitioners having access to consistent, structured, and contemporary training. Currently, there is no nationally recognised framework for training and accrediting veteran advocates across Australia. The result is significant variation in competence, service delivery, and consumer protection, regardless of whether services are provided through volunteer, fee-for-service, or hybrid models.

As a national professional body focused on sector development, VESPIIA recommends the design of a nationally regulated, competency-based training and accreditation framework. This framework should apply to all individuals and organisations delivering advocacy support to veterans and their families.

Principles for a National Framework

VESPIIA proposes that the following principles underpin any future training system:

- Competency-based learning: Training should reflect the complexity of legislative frameworks, systems navigation, and client engagement required for effective advocacy.
- Baseline national standards: All advocates should be assessed against shared competencies and ethical practice standards, regardless of delivery model or funding source.
- Flexible practical training: Acknowledging that most skills are developed in the field, the framework should allow for practical training to be delivered by individual organisations, while maintaining consistency through agreed national benchmarks.
- Continuing professional development (CPD): Ongoing training, reflective practice, and skills maintenance should be built into the framework to support sustained quality across the sector.

VESPIIA's Role in Sector Capability

VESPIIA's core operations already include the design and delivery of professional development programs, training workshops, and ethical conduct standards for members. This positions the organisation to play a constructive role in helping shape a future national framework, should the opportunity arise.

We also note that workforce development must be coordinated across both paid and volunteer providers. This includes addressing current shortages in trained advocates and supporting clearer career pathways between different models of service.

A Pathway to Sector-Wide Reform



A consistent training and accreditation model will strengthen service quality, reduce harm, and improve outcomes for veterans. It will also support broader system objectives, including faster claims resolution, reduced administrative burden, and improved trust in advocacy services.

VESPIIA welcomes the opportunity to collaborate with government, the Institute of Veteran Advocacy (IVA), ESOs, training providers, and advocates to co-design a model that is robust, inclusive, and nationally scalable.

7. Conclusion

This submission has outlined the systemic challenges affecting the delivery of advocacy services to veterans, and proposed clear steps to improve quality, oversight, and consistency across the sector. These recommendations do not advocate for any particular service model but instead prioritise outcomes; timely, ethical, and competent support for all veterans, regardless of how or by whom services are delivered.

VESPIIA has identified key areas where a national approach to professional standards, training, and ethical conduct would help build trust, reduce risk, and improve system efficiency. We have also outlined the potential role of a sector-led working group to support this work in coordination with government and industry.

As Australia's national professional body for organisations and practitioners working with veterans, first responders, and their families, VESPIIA remains committed to working constructively with the Department of Veterans' Affairs, other advocacy bodies, and the wider sector. Our focus is on practical, long-term reforms that support both system integrity and veteran wellbeing.

We thank the Senate Select Committee for the opportunity to contribute to this inquiry and would welcome further engagement on the recommendations outlined here.

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Recommendations

VESPIIA makes the following recommendations to the Senate Select Committee:

1. Establish a national regulatory framework for veteran advocacy services that applies across all delivery models — including volunteer, fee-for-service, legal, and hybrid providers.
2. Introduce minimum competency and training standards through a nationally recognised, competency-based framework, incorporating both baseline qualifications and continuing professional development (CPD).
3. Mandate a uniform Code of Conduct for all veteran advocates, grounded in ethical practice, client protection, and clear accountability mechanisms.
4. Support the formation of a cross-sector working group or advisory body, with the capacity to provide interim governance, inform standards development, and assist with complaint handling and disciplinary processes.
5. Ensure inclusive representation of all advocacy models, including ESOs, independent practitioners, legal providers, and commercial entities, within any future regulatory or advisory structure.
6. Prohibit practices that create financial conflicts of interest, including undisclosed commission-based or incentive-driven billing arrangements.
7. Strengthen privacy and data security requirements, including a prohibition on the undisclosed offshore handling of veterans' personal or medical information. Mandatory Australian data residency should apply to all advocacy providers.
8. Modernise DVA systems infrastructure, including improved advocate access to MyService and the replacement or overhaul of the ESO Portal to improve transparency, functionality, and claim efficiency.
9. Increase investment in the Building Excellence in Support and Training (BEST) program to support the sustainability of volunteer advocacy services and enable mixed-model service delivery in high-demand areas.
10. Facilitate structured collaboration between professional bodies (such as VESPIIA and the Institute of Veteran Advocacy), government agencies, and service providers to support the implementation of reform and track sector-wide outcomes.

