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**To:**  
**Foreign Affairs, Defence and Trade Committee**  
**Department of the Senate**  
**PO Box 6100**  
**Parliament House**  
**Canberra ACT 2600**

**Dear Committee Members,**

As principal of TAG (Tactical Advocacy Group), I write on behalf of our team and the veterans we serve to urge the urgent establishment of a robust regulatory framework for Department of Veterans' Affairs (DVA) private advocates. This is critical in light of the Royal Commission into Defence and Veteran Suicide and recent sector reviews, which have revealed the profound positive impact of private advocacy support on veteran outcomes.

The Royal Commission's final report has made it clear that experienced, effective advocacy is fundamental to suicide prevention among Australian veterans. More than 32% of the Royal Commission submissions cited "DVA: claims and compensation" as a direct contributor to distress and suicidality. Many veterans reported that advocates were essential in navigating these complex processes and in helping to reduce adversarial tension with DVA. Poor or absent advocacy was frequently identified as a risk factor, whereas positive experiences with private advocates were associated with greater access to entitlements, improved wellbeing, and a reduction in crisis situations for vulnerable veterans.

The Commission also highlighted a serious and growing demographic issue: the ESO advocacy workforce is aging rapidly, with many highly experienced advocates nearing retirement. There are insufficient new entrants to replace them, a fact that places at risk both service quality and the long-term sustainability of veteran support. Private advocates are filling this gap to support veterans. Without an urgent change to attract, train, and retain a new generation of advocates, access for future veterans will diminish markedly, without private advocacy.

### **Core Recommendations for a Modern Regulatory Framework**

- Mandatory Registration and Accreditation
- All DVA private advocates should register with a designated regulatory authority (e.g., an Institute of Veterans' Advocates).
- Maintain a public register for transparency and accessibility.

### **Competency Standards and Qualifications**

- "Grandfather" experienced advocates, subject to passing a relevant competency test on DVA legislation and procedure.
- Require new entrants to pass the same standardised competency test, with accessible, government-approved courses provided.
- Mandatory ongoing professional development and continuing education.
- The ATDP Course should be available to all private advocates, not just those nominated by an ESO.

### **Comprehensive Code of Conduct and Ethics**

- Adopt a professional code modelled on migration and tax agent regulation, covering professionalism, fee transparency, conflict-of-interest management, confidentiality, and client-focused service delivery.

### **Preservation of the Success-Based Fee Model**

- Maintain a transparent, success-based fee structure to ensure business viability and veteran access.
- Require strict fee disclosure for all services so veterans retain choice and protection.

### **Independent Oversight and Complaints Management**

- Establish an empowered regulatory body to monitor compliance, investigate complaints, and impose disciplinary action.
- The complaints process must be transparent, independent, and publish outcomes for public accountability.

### **Mandatory Professional Indemnity Insurance**

- All advocates must hold professional indemnity insurance.

## **Implementation Pathway**

We propose:

- Clear regulatory and legislative guidelines should be agreed and enacted within 6 months.
- Registration window for existing advocates, with grandfathering, should be implemented within the next 6-12 months.
- National rollout of competency testing and preparatory training over the next 6-18 months.
- Full implementation of all regulatory requirements within 18-24 months.
- Ongoing professional development and sector monitoring should be established.

## **Benefits**

- For veterans: Reliable, ethical advocacy, higher service standards, and greater confidence navigating complex DVA processes during periods of high vulnerability.
- For advocates: Professional recognition, career sustainability, and clear entry pathways for new advocates, addressing critical demographic weaknesses.
- For government: Stronger consumer protection, improved public trust, and cost-effective oversight modeled on regulatory best practices.

**We urge the Senate to adopt these reforms in full alignment with the Royal Commission's recommendations, to recognise the lifesaving impact of the advocacy sector, ensure its future viability, and deliver a professional, fair, and veteran-centric system for all who serve.**

TAG stands ready to assist with consultation and implementation, advancing the interests of the veteran community and supporting the government's public service quality goals.

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