



Friday 3rd October, 2025

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

By email: fadt.sen@aph.gov.au

Dear Chair and Committee

Senate Inquiry into Issues Relating to Advocacy Services for Veterans Accessing Compensation and Income Support – Hearing, 26 September 2025

1. We refer to the Committee Hearing of 26 September 2025 (**Hearing**) and to KSC Claims submissions of 25 March 2025 (**KSC Submissions**).
2. Following advice that the Committee does not propose to hold further hearings, we write to correct the record in response to certain adverse reflections on KSC Veterans Support Pty Ltd (**KSC**) made during the Hearing.
3. We do so pursuant to the right of reply afforded by the Chair, and in the interests of ensuring that the Inquiry remains focused on its central purpose - how best to serve veterans - rather than being diverted by inaccurate or misleading claims.
4. Acknowledging the right of reply afforded by the Chair of the Committee during the course of the Hearing, these submissions and responses are provided in the interests of the efficient conduct of the Inquiry and in the absence of any formal invitation being extended to KSC to provide such response being received.

Introduction

5. At the outset KSC expresses disappointment at not being afforded the opportunity to appear and give evidence as other stakeholders in the veteran's advocacy ecosystem were.
6. KSC was founded in March 2020 by two veterans, Luke Armstrong and Matt Dumars, who have since assisted thousands of veterans with Department of Veteran's Affairs (**DVA**) claims, of which over 300 have been pro bono. From inception, KSC has been veteran-owned, veteran-run, and wholly focused on the holistic support of those who have sacrificed for this country.
7. Much of the discourse of the Hearing highlighted the lack of transparency of the veteran's advocacy ecosystem and the need for regulation. KSC wholeheartedly supports such recommendations, as referenced in the KSC Submissions.

 **SMS** +61 482 076 328
 **Email** info@ksccclaims.com.au
 **Call** +61 7 3185 5691

ksccclaims.com.au



8. KSC believes that the record must be corrected, due to evidence given to the Committee during the Hearing, and wishes to volunteer answers to questions raised by the Committee.
9. KSC volunteers the response and answers, in the interests of refocussing the Committee on the primary issue in which the Inquiry wishes to resolve, being the interests of veterans and how best to support and facilitate their needs through advocacy.

Evidence Given to the Inquiry

KSC Business Structure

10. Inferences drawn at the Hearing regarding the residency of KSC's founders were misplaced. Both directors relocated overseas after leaving the RAAF, in part to distance themselves and their families from the trauma of abuse they had reported. To suggest nefarious intent is not only disrespectful to their lived experience, but undermines the wellbeing of veterans more broadly. Such inferences are not only dangerous to the wellbeing of veterans but in conflict with the overarching purpose of the Inquiry.
11. KSC's has retained a presence in Australia, through the diligent and capable staff who are based in Queensland. Given the overwhelming numbers of clientele situated in Queensland it was important for KSC to have a local touchpoint for veterans in order to provide comprehensive and diligent advocacy.
12. The incorporation in Australia, as KSC, was made following advice from the Institute of Veteran's Advocates (IVA) to ensure compliance with future regulatory settings. That decision, like all decisions at KSC, was veteran-centric.

KSC Fee Structure

13. Evidence that KSC charged up to 15% was incorrect.
14. Since 2022, KSC's fee has been fixed at 9% plus GST on successful claims. For completeness, we advise the Committee that for a claim to be "successful" a veteran must receive an award of permanent impairment compensation or an offer of permanent impairment compensation.
15. Where a claim is withdrawn or an agreement terminated, the fee is a fixed \$2,500 plus GST.
16. These terms have been transparently published on our website and provided to all clients. Veterans may dispute any invoice in whole or in part.
17. In furtherance of our commitment to our clients, KSC is in the final iteration stage of updating its engagement terms, to strengthen protections for veterans, including:
 - (a) increased transparency regarding costs, including a maximum amount of fees payable by a veteran to enable veteran's to provide informed consent in proceeding with DVA claims;



- (b) a cooling off period, to enable veteran's to terminate an agreement with KSC without any costs implications;
- (c) an itemised invoice, allowing veterans to clearly see the services performed and a detailed breakdown of each item claimed by KSC; and
- (d) a clear dispute resolution protocol, involving negotiation and mediation, through the WorkAccord veteran mediation model, as mandatory steps to be deployed in resolving any dispute.

KSC Defamation Matters

- 18. Mr Weston's claim that KSC had "over a dozen" defamation proceedings against veterans is untrue. KSC currently has one such matter on foot.
- 19. Litigation has always been a last resort, pursued only to protect against demonstrably false and damaging statements. KSC's association with WorkAccord, with its emphasis on early, interest-based resolution, underscores this commitment.

Further Submissions – The Place of Fee-for-Service Advocates

- 20. The Hearing failed to ask the most pertinent question regarding veteran's advocacy: **what is in the best interest of the veteran?**
- 21. The critical question before this Inquiry is not whether fee-for-service models should exist, but how veterans can be best supported to access their entitlements in a timely, professional and respectful manner.
- 22. Veterans are not a homogenous group. Some prefer to engage with Defence-aligned ex-service organisations (**ESOs**) such as the RSL - others do not. Many veterans, particularly those who have experienced abuse or trauma during service, do not feel comfortable approaching Defence-linked bodies. To insist that there is only one acceptable pathway is to deny veterans their autonomy and to infantilise them as incapable of exercising informed choice. That is both wrong in principle and offensive to those who have already demonstrated their ability to serve their country with distinction.
- 23. Fee-for-service advocacy fills a critical gap in the ecosystem. ESOs themselves have acknowledged being overwhelmed, with backlogs stretching into the hundreds and veterans waiting months for any response. To remove or restrict private providers would further choke an already failing system, leaving veterans languishing for months, or years, without resolution of their claims.
- 24. Far from competing, fee-for-service advocates and ESOs perform complementary roles. Private advocates reduce pressure on ESO caseloads, increase overall system capacity, and offer veterans meaningful alternatives when the free system is not meeting their needs. Removing one pillar would not protect veterans - it would harm them.



25. Importantly, veterans are not being misled into engaging private advocates. KSC has grown almost entirely through referrals from veterans who have experienced the service and then recommended it to others. This is testament to the value provided, not to marketing spin.
26. Veterans are capable adults, not “broken diggers”. They are entitled to choose their advocates, just as they choose their lawyers, doctors, or financial advisers. Denying them that choice would be a profound step backwards, one that prioritises institutional self-interest over the welfare of the very people this Inquiry is meant to serve
27. The Committee should not be misled by ideological hostility to fee-for-service models. The question is not “free versus fee,” but whether veterans have timely access to competent, culturally competent, and accountable advocates. On that test, fee-for-service providers are an indispensable part of the solution.

Regulation and Transparency

28. KSC's has never wavered from its position that veterans' advocacy is in desperate need of regulation and transparency.
29. We encourage the Committee to recommend:
 - (a) a standardised regulatory framework for veterans' advocates;
 - (b) improved training, accreditation and professional accountability; and
 - (c) restraints on marketing and advertising activities of advocates, with regulatory oversight.
30. KSC would welcome a similar regulatory regime, to those applied to the legal services and medical services industries, as alluded to by Dr Cronin. KSC is aware of the proposed IVA and acknowledges that such an association is essential to the transparency of the advocacy ecosystem, and more importantly, ensuring that veterans receive the most effective advocacy and support.

Closing Remarks

31. Much of the evidence before this Inquiry has been framed around protecting institutions, rather than empowering veterans. That is a mistake. The question is not whether services are provided by ESOs or fee-for-service advocates, but whether veterans are able to access competent, timely and culturally competent support when they need it most.
32. The RSL and other ESOs perform an important role. But their capacity is stretched, their processes are slow, and many veterans simply do not feel comfortable engaging with Defence-aligned bodies. To deny those veterans an alternative is to deny them their agency, their dignity, and their right to choose the advocate that works best for them.
33. Fee-for-service advocacy, properly regulated, is not a threat to veterans. It is an indispensable part of the solution. It increases system capacity, relieves pressure on overstretched ESOs, and provides real choice to veterans who want and deserve it. To characterise such models



as “cowboys” is a distraction from the far more important reality: veterans are suffering delays, systemic failures, and poor outcomes under the current model.

34. KSC embodies the qualities this Inquiry has repeatedly identified as essential: trained, culturally competent, holistic, and grounded in lived experience. We do not need to convince veterans of this fact - our growth has come from referrals by veterans who have already benefited from our work.
35. We therefore urge the Committee to break with the outdated “broken digger” narrative. Veterans are not incapable of making decisions for themselves. They are adults who have already demonstrated courage, discipline and service. They deserve the right to choose their advocate, and they deserve a system that respects and facilitates that choice.
36. KSC will remain veteran-owned, veteran-run and veteran-centric. We welcome regulation, transparency and accountability. But above all, we urge the Committee to ensure its recommendations protect and empower veterans, not entrench the self-interest of institutions.

Kind regards

Luke Armstrong

KSC Claims – Founder