

Australian Government

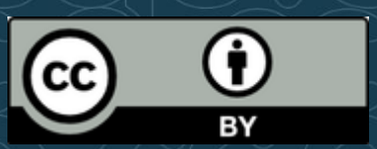
Defence and Veterans' Service Commission

Access to Information

Inquiry Report

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Inquiry Snapshot

There is too much complexity, and a lack of clarity, about accessing this important information from ADF and DVA. DVA and the Department of Defence should improve access to information for serving and ex-serving Defence members and their families. – Royal Commission into Defence and Veteran Suicide

5 recommendations reviewed

Have Recommendations been implemented?		Has implementation been effective?	
3 are partially implemented		**4** have insufficient evidence to demonstrate effectiveness	
2 are fully implemented		**1** is on track to demonstrate effectiveness	

What is the Government doing well?

Defence and DVA have:

- Created new Information Access Units
- Made administrative release the primary pathway for information access
- Rolled out trauma-informed training to some staff

What could be improved?

- Some public guidance could be made more user-friendly
- Departments should introduce more opportunities for people to consent to the release of their own information
- Departments need frameworks to evaluate the effectiveness of their actions, incorporating member and veteran feedback

Commissioner's Recommendation

That Defence and DVA each:

a. establish a framework for assessing the effectiveness of implemented recommendations, incorporating feedback from the member and veteran community and relevant data
b. undertake an immediate review of the effectiveness of the measures implemented to date in response to these Royal Commission's recommendations and address areas in which the measures are not effective.

Commissioner's Foreword



Penny McKay
Commissioner

In August 2022 the Royal Commission into Defence and Veteran Suicide (Royal Commission) made five urgent recommendations to government to improve access to information for Defence members, veterans and their families. They identified access to information as crucially important.

> *There is too much complexity, and a lack of clarity, about accessing this important information from ADF and DVA. DVA and the Department of Defence should improve access to information for serving and ex-serving Defence members and their families.*[1]

Defence members, veterans and their family members are not seeking access to information out of idle curiosity – they often have a greater goal in mind, whether it be to make a claim, seek review of a complaint, assist their transition out of the defence force or get closure through understanding the circumstances surrounding the death of a loved one. Delays, barriers, and frustrations in accessing information can negatively impact wellbeing and mental health.

The government agreed to implement all five interim recommendations and both the Department of Defence (Defence) and the Department of Veterans Affairs (DVA) reported the recommendations as implemented some time ago – Defence in August 2024 and DVA in June 2023. It is therefore reasonable for the community to expect the Australian Government to have fully and meaningfully

[1] Royal Commission into Defence and Veteran Suicide, *Interim Report recommendations*, Royal Commission into Defence and Veteran Suicide, n.d., accessed 18 September 2026.

implemented the recommendations and for the experience of those engaging with the process to be better as a result.

This is why I prioritised this inquiry.

In this inquiry I focused on answering 3 key questions in relation to each recommendation:

1. Has the recommendation been implemented in a timely way?
2. Did implementation meet the intent of the Royal Commission – that is, was it implemented meaningfully?
3. Was the implementation effective – did it achieve the improvement it was aimed at making, or more specifically, did it improve wellbeing outcomes for serving and/or ex-serving members of the ADF?

In short, I found significant progress has been taken in a timely way to improve the processes to access information from Defence and DVA, including the establishment of Information Access Units (IAUs) in each department and embed trauma informed practices through training and policy. This is a significant improvement. The IAUs are intended to be a trauma-informed, single point of contact for applicants seeking information and advice and facilitate a 'no wrong door' approach across the departments. Both departments also now prioritise administrative release as the preferred means of getting information to applicants without the need for legal process.

I was also pleased to see both Defence and DVA established a Program Board of senior officials to monitor the progress of the implementation of the Royal Commission's recommendations. This is an important step in providing a level of internal assurance over implementation actions and maintaining reform momentum.

However, I also found that in order to meet the intent of the Royal Commission – to actually improve the experience of those trying to access information by making it simpler, faster, trauma-informed and more coordinated – more could be done in relation to 3 out of 5 of the recommendations. I ultimately concluded that the implementation of Interim Recommendations 9 and 11 fully met the intent of the Royal Commission and therefore are, in my view, implemented.

Effectiveness was difficult to assess. I drew upon public submissions I received from individuals and organisations navigating the system. They provided me with valuable insights and information about how the access to information process is working or not working. I've used those submissions as examples throughout this report, however alone, they are not a sufficient basis to draw an evidence-based conclusion about effectiveness.

Impact needs to be measured. From the outset, Defence and DVA lacked a concrete plan to assess the effectiveness of each measure they implemented. Without a way to measure and track effectiveness, the hard work each department has undertaken may not be understood and ways to further improve not identified or realised. To their credit, this issue was identified by the Defence Program Board in assessing implementation, but unfortunately, the Program Board's recommendation to conduct post-implementation reviews has not yet been actioned.

To this end, I make one recommendation aimed at putting mechanisms in place to track and evaluate whether the changes made are making a positive difference for Defence members, veterans and their families.

Going forward it will also be important to ensure the IAUs and Freedom of Information (FOI) teams are sustainable, particularly in DVA. If not properly resourced, processes are likely to be delayed and cause further frustration to those trying to access information. Therefore, I consider it

important the departments ensure the IAUs are properly resourced, trained and embedded, or their potential to assist the member and veteran community will not be realised into the future.

I've made suggestions throughout this report regarding further action that can be taken to meaningfully implement the recommendations and measure effectiveness of the improvements. The DVSC will continue to monitor the progress of these recommendations and report upon implementation and effectiveness of the improvements to access to information in future reports, including as part of our second major progress report, due by late 2030.

I would like to thank all those who contributed to this inquiry. I acknowledge the responsiveness of Defence and DVA to my requests for information and commend them for working together to implement these recommendations. I also acknowledge the governance framework and planning dedicated to implementing the recommendations – it is clear that significant time and resources have been committed by both departments to this process. I am also particularly grateful to those individuals and organisations who provided submissions. Your thoughtful and considered input is greatly appreciated.

Findings

Recommendation	Government Status	Commissioner's Assessment	Did implementation improve outcomes for veterans and members?
Recommendation 9: Improve administrative release of information	Implemented	Implemented	On track
Recommendation 10: Co-design information to increase awareness of redactions	Implemented	Partially Implemented	Insufficient evidence
Recommendation 11: Embed trauma-informed practices for information access	Implemented	Implemented	Insufficient evidence
Recommendation 12: Increase opportunities to provide up-to-date consent for information access	Implemented	Partially implemented	Insufficient evidence
Recommendation 13: Co-design education on information access mechanisms	Implemented	Partially Implemented	Insufficient evidence

Definitions

Implemented: Action has been take to address all aspects of the recommendation in a meaningful way and to meet the intent of the Royal Commission's recommendation.

Partially Implemented: Some action has been taken towards implementing the recommendation, but more needs to be done to meet the intent of the Royal Commission's recommendation.

On track: Outcomes are being measured and improvements appear to be having a positive impact, but more information is needed to form an evidence-based view of effectiveness.

Insufficient evidence: There is not sufficient evidence to form an evidence-based view of effectiveness.

Commissioner's Recommendation

I make the following recommendation:

1. That Defence and DVA each:

    a. establish a framework for assessing the effectiveness of implemented recommendations, incorporating feedback from the member and veteran community and relevant data

    b. undertake an immediate review of the effectiveness of the measures implemented to date in response to these Royal Commission's recommendations and address areas in which the measures are not effective.

Background to this Inquiry

Background to this Inquiry

The Royal Commission's interim report contains 5 recommendations to improve serving, ex-serving members' and their families' access to personal information. In short:

- Recommendation 9: Improve administrative release of information
- Recommendation 10: Co-design information to increase awareness of redactions for access requests
- Recommendation 11: Embed trauma-informed practices for information access
- Recommendation 12: Increase opportunities to provide up-to-date consent for information access
- Recommendation 13: Co-design education on information access mechanisms.

The interim report was published in August 2022 and the recommendations agreed to by Government in September 2022.

On 27 January 2026 I commenced an inquiry to consider:

- The extent of the Government's implementation of the recommendations.
- Any gaps or issues evident in the implementation of the recommendations.
- Data comparisons on information accessed in, prior to, and since the implementation of the recommendations, including:
  - requests for information actioned
  - requests for information approved
  - requests for information denied
  - timeframes for actioning requests
  - complaints and feedback about the request for information process.
- Whether the user experience of the information access processes in Defence and DVA has improved as a result of these reforms and meets the needs of the users and the intent of the reforms.
- The overall effectiveness of the reforms.

How implementation was assessed

In this Inquiry, I assessed the Government's actions to implement the agreed recommendations of the Royal Commission.

To assess the implementation of these recommendations I sought information from:

- Defence
- DVA
- Commonwealth Ombudsman
- Office of the Australian Information Commissioner (OAIC)
- Individuals and organisations with lived experience.

Defence and DVA provided extensive documentation, including project plans, monthly reports, closure reports, and a thorough detailing of their governance processes. I received supporting information from the Commonwealth Ombudsman and the OAIC.

I also received 27 written submissions from individuals and organisations in response to a public submission process.

To assist me in addressing the terms of reference, I considered the following questions:

1. Has the recommendation been implemented in a timely way?
2. Did implementation meet the intent of the Royal Commission – that is, was it implemented meaningfully?
3. Was the implementation effective – did it achieve the improvement it was aimed at making, or more specifically, did it improve wellbeing outcomes for serving and/or ex-serving members of the ADF?

Timeliness is relatively easy to assess – has the recommendation been implemented within the required or planned timeframe, or otherwise within a reasonable timeframe? To assess timeliness, we considered any timeframes indicated in the recommendation itself, timeframes set by the departments as part of their implementation plans, and the overall reasonableness of the time it has taken to take the steps to implement the recommendation.

To assess intent, or meaningful implementation, we assessed whether actions taken to implement addressed all aspects of the recommendation, went beyond 'ticking the box' and were consistent with meeting the aim or intent of the recommendation.

It is acknowledged that intent of a recommendation may be met in different ways. For example, a department may have identified a better, or more achievable, pathway to achieve a recommendation's intent than the specific actions outlined in the Royal Commission's recommendation. This would meet our assessment of 'implemented'. On the other hand, a department may have implemented the

elements of a recommendation to the letter but added additional elements to their implementation that meant the intent of the recommendation was not fully achieved. This would not meet our assessment of 'implemented'. I also note that when a recommendation has been 'agreed' rather than 'agreed-in-part' there is an expectation that all aspects of the recommendation should be implemented in order to be assessed as fully implemented.

The question of improved outcomes, or effectiveness, is two-fold – did it achieve the improvement it was aimed at making, and more specifically, did it improve wellbeing outcomes for serving and/or ex-serving members of the ADF and their families? Impact needs to be measured and have evidence to form a view about effectiveness.

While the 27 submissions received from individuals and organisations provided valuable insights and information, the sample size is not large enough to draw definitive evidence-based conclusions. Submissions have, however, been used as examples throughout this report.

Relevant concepts

This report refers to some common concepts, processes and implementation steps. To avoid repetition, these are explained here.

Administrative Release, Freedom of Information and Privacy Act requests

There are three pathways for people to access information held by the government.

1. *Administrative Release*: This allows a person to access information in an informal way instead of having to comply with a process set out in legislation. This process can be quicker, easier and more efficient than formal processes. However, the department must have a lawful basis to disclose the information. When there is a question about the basis for disclosure, the person may be requested to make an application under the *Freedom of Information Act 1982* (FOI Act). *Note*: Defence has a specific administrative release process referred to as a personal information request.

2. *Freedom of Information requests:* The FOI Act provides a formal process to make a request to access government information. This process is subject to statutory timeframes and includes exemptions that allow the Government to refuse to release, or redact, some types of information.

3. *Privacy Act requests:* The *Privacy Act 1988* (Privacy Act) governs how government agencies can collect, use, and deal with a person's information. It also provides individuals with a general right to access their own personal information. A government agency must give a person access to their personal information when they request it, except where the law allows them to refuse its release. The Privacy Act does not prescribe a specific process for how information should be released, and depending on the type of personal information requested, it may be dealt with by administrative release or under the FOI Act.

Information Access Unit

In March 2023 Defence and DVA each created a new Information Access Unit (IAU). These units are intended to act as centralised points of contact for the administrative release of personal information and operate as the preferred information access pathway for applicants. They are to be supported by staff trained in trauma-informed practices to ensure sensitive, consistent and applicant-centred service delivery.

In Defence, the IAU only handles personal information requests, and the Freedom of Information (FOI) team remains the point of contact for FOI requests. However, DVA describes its IAU as 'a central resource responsible for managing requests for information held by the Department. This includes handling FOI requests, administrative releases, subpoenas, and court orders'.

Co-design workshops

In October and November 2022 Defence and DVA contracted an independent consultant to run co-design workshops with 94 serving and ex-serving members, family members, and representatives. These workshops had two rounds: one to generate ideas and one to refine the ideas into implementable designs. The workshops involved discussion across the 5 recommendations related to access to information. Defence and DVA reported the following 5 key insights emerged:

1. *Information access is the means, not the end*: Customers who are trying to access information often have a greater goal in mind; they want to make a claim, transition or get closure.
2. *It all starts with consent*: Access to information starts with consent. Consent as a process needs to be formalised and structured. It is currently disorderly across the forces.
3. *There is one Commonwealth*: Customers see Government as one entity. They do not care about the distinctions between Defence, DVA and Commonwealth Superannuation Corporation.
4. *Consistently, inconsistent*: Today's experience on the front stage is highly inconsistent, causing confusion and even distress for the people who experience it.
5. *The digital bar has been set*: Customers expect digital as normal with the bar set by Big Tech. They do not expect to receive documents on CDs and USBs.

Defence advised that 20 concepts were proposed from the workshops – 15 were subsequently developed, including those regarding administrative release (Recommendation 9) and awareness of information access mechanisms (Recommendation 13).

Progress Reports and Closure Reports

Defence and DVA each established a Program Board of senior officials to monitor the progress of the implementation of the Royal Commission's recommendations. For each recommendation, Defence and DVA prepared reports monitoring their progress in implementing the recommendations. This included reporting on key milestones, forthcoming bodies of work, and ongoing risks and mitigations.

When Defence and DVA considered a recommendation implemented, they requested their Program Board agree to close it. The Board then provided a report on the implementation and recorded either their agreement to close, or their refusal.

ServiceConnect

ServiceConnect is Defence's digital platform for accessing Defence services, including accessing service records.

Recommendation 9

Improve administrative release of information

Recommendation 9: Improve administrative release of information

The Australian Government should:

(1) by March 2023, produce and publish administrative release guidelines to better support applicants to access information held by the Department of Veterans' Affairs and Defence, and

(2) immediately prioritise use of administrative release and proactively work with applicants to facilitate access via this process, including following a request for information under the *Freedom of Information Act 1982* (Cth) and the *Privacy Act 1988* (Cth) – but without delaying or restricting processes under either of these Acts.

Australian Government response

The Government **agrees** to this recommendation.

The Government recognises how clear, published, department-wide, trauma-informed policies regarding the administrative release of information, consistent with Australian information law principles, would empower both applicants and decision makers.

The Government further recognises how such policies would enable the proactive use of administrative release for applications for information, whether made under or outside the *Freedom of Information Act 1982* (Cth) and the *Privacy Act 1988* (Cth).

The Government also recognises the importance of consultation on the means of information access, as well as education about processes, and will seek to do so consistently with its work on Recommendation 13 below.

Defence and DVA have commenced work towards this recommendation.

Intent of Recommendation 9

The intent of this recommendation is to provide clear guidance to applicants and proactively prioritise administrative release as a preferred pathway for accessing information from Defence and DVA.

Commissioner's findings

Government Status	Commissioner's Assessment	Did implementation improve outcomes for members and veterans?
Implemented	Implemented	On track

Actions taken

Before the end of March 2023, Defence and DVA had:

- published new administrative release guidelines and other supporting documents and updated Defence and DVA websites[2]
- established a 'no wrong door' policy, so all applications will be transferred internally to the right place for processing
- established administrative release as the preferred pathway established new IAUs, intended as a single point of contact for administrative release applications.

Defence also implemented a digital personal information request process through ServiceConnect.

Defence approved closure of this recommendation on 22 March 2023. DVA approved closure of this recommendation on 29 June 2023.

Implementation

I am satisfied that both Defence and DVA took the necessary steps to implement Recommendation 9 and did so in a timely way. The recommendation was accepted in September 2022 and implemented by March 2023. They published new administrative release guidelines and supporting material (Defence in February 2023, DVA in March 2023), implemented a policy of internal referral of matters to a centralised point, prioritised administrative release, and established an IAU (both departments by March 2023) intended to be a single point of contact and advice to applicants.

On their face both Defence and DVA's new administrative release guidelines appear clear and useful. They explain:

- what information can be released administratively
- who can request administrative release
- when administrative release can occur
- the benefits and limitations of administrative release, and
- where legal barriers prevent release.

They identify escalation points of contact, when escalation may be required, and outline the 3 access to information pathways with links to public websites. They set out the required protocols for identity, consent, and proof of relationships across applicant categories (serving/ex-serving members, families, advocates and families of deceased members).

Defence's website clearly directs users to administrative release as a primary information access pathway. DVA's website is less directive but highlights the potential advantages of administrative release over FOI.

[2] Department of Defence, *Personal information requests*, Defence website, n.d., accessed 18 September 2026; Department of Veterans' Affairs (DVA), *Accessing information Guidelines & Policies*, DVA website, 2024, accessed 18 September 2026;

In 2024 Defence supplemented their guidance with the publication of an Information Release Policy,[3] articulating 9 key principles guiding Defence's approach to information access. This is discussed in further detail as part of Recommendation 13. Principle 8 outlines a 'no wrong door' policy whereby current and former Defence personnel and their nominated representatives can receive assistance with their request for personal information, regardless of their first point of contact for such information. Defence advised that information access requests received in other parts of the department are acknowledged by the recipient and forwarded to the IAU for further handling.

DVA's Information Release Policy also states it has a 'no wrong door' policy, although it does not provide any further information.[4] DVA advised that staff are trained to conduct FOI triage to identify cases that would be more appropriate for administrative release and contact applicants to seek permission to divert those cases. It is not clear to what extent Defence staff consult applicants during the same process.

Both Defence and DVA have taken the recommended steps to provide clear guidance to applicants about the administrative release process, prioritise the use of administrative release over other legislative pathways and implement a 'no wrong door' approach. I therefore assess that both departments **implemented** this recommendation in a timely way.

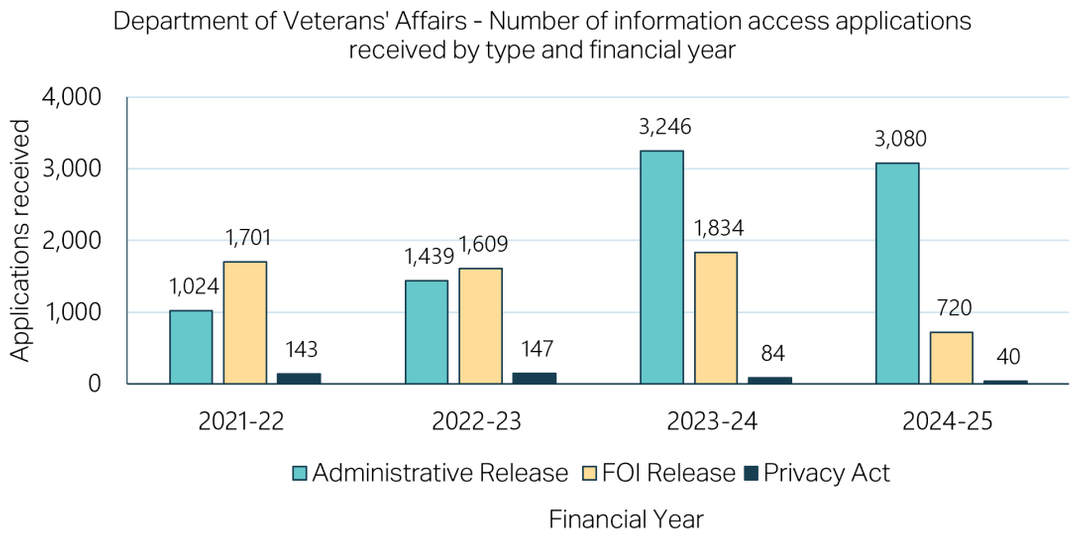
[3] Department of Defence (Defence), *Defence Information Release Policy - Accessing Information*, Defence, 2024, accessed 18 September 2026.
[4] Department of Veterans' Affairs (DVA), *DVA Information Release Policy*, DVA, 2023, accessed 18 September 2026, p 8, Principle 6.

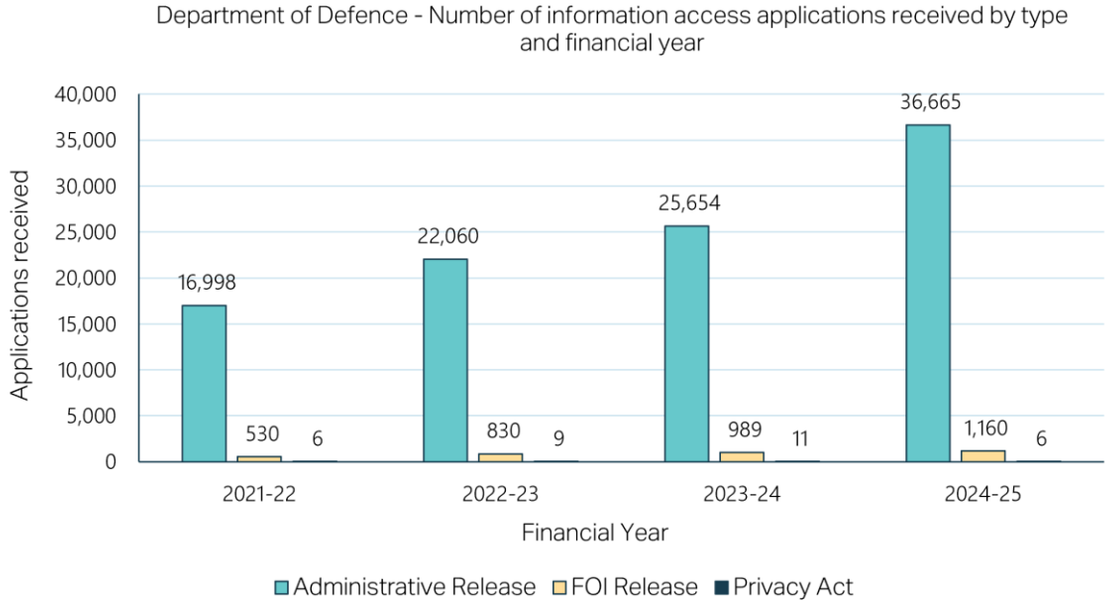
Effectiveness

In order to assess the effectiveness of this recommendation, we considered available data, complaint feedback and public submissions.

The following data provides insight into the possible impact of these measures.

Increase of administrative release applications from 2021-22 to 2024-25 (before and after the recommendation was implemented), compared to FOI and Privacy Act applications





This data shows a 115% increase in administrative access applications over 3 years in Defence and a 200% increase in DVA over the same period, whilst Privacy Act requests remained low and stable for both departments over the same period. This is significant.

Notably, FOI applications to Defence increased by 215% over the same period of time, whereas DVA FOI applications rose to a peak in 2023-24, before falling considerably in 2024-25. Apart from DVA's drop in 2024-25, these FOI numbers are generally consistent with trends across Commonwealth agencies, which climbed between 2023 and 2025.

It is possible that the decrease in DVA's FOI numbers in 2024-25 may be attributable to prioritising the use of administrative release for information requests. However, one year's data is not sufficient to conclude this and greater examination of this and further years data is needed to determine if this policy was a contributing cause to the decrease. I acknowledge the data provided below regarding transition of FOI applications to alternative pathways suggests it may be a contributing factor.

The number of applications made under FOI or Privacy Acts that were transitioned to administrative release (before and after the recommendation was implemented)

- Defence: did not provide this data.
- DVA: In 2021-22, DVA transitioned 11 FOI applications and 16 Privacy Act applications to alternative pathways. In 2024-25, Privacy Act applications transition to alternative pathways had fallen to 2, but FOI applications moved to alternative pathways had risen to 245 (7% of applications received).

The higher number of FOI applications successfully resolved by alternative mechanisms is not simply because DVA received higher numbers of FOI requests that year – alternative pathway resolutions increased, proportional to applications, even when total FOI request numbers fell. This is positive, as it demonstrates that DVA's IAU proactively worked with applicants to prioritise administrative release, reducing the burden on applicants to determine which pathway is correct. Numbers of administrative release applications later transitioned to other pathways remained relatively low, highest at 26 in 2024-25.

Defence did not provide equivalent data on the migration of applications between pathways. However, their website clearly articulates that personal information requests must be made by administrative release in the first instance, not FOI, and such requests made under FOI may be internally redirected. This is an effective measure to ensure that personal information requests are dealt with administratively rather than by FOI when appropriate, although without data regarding how many matters were transitioned from FOI to administrative release, it is difficult to assess whether this is happening in practice.

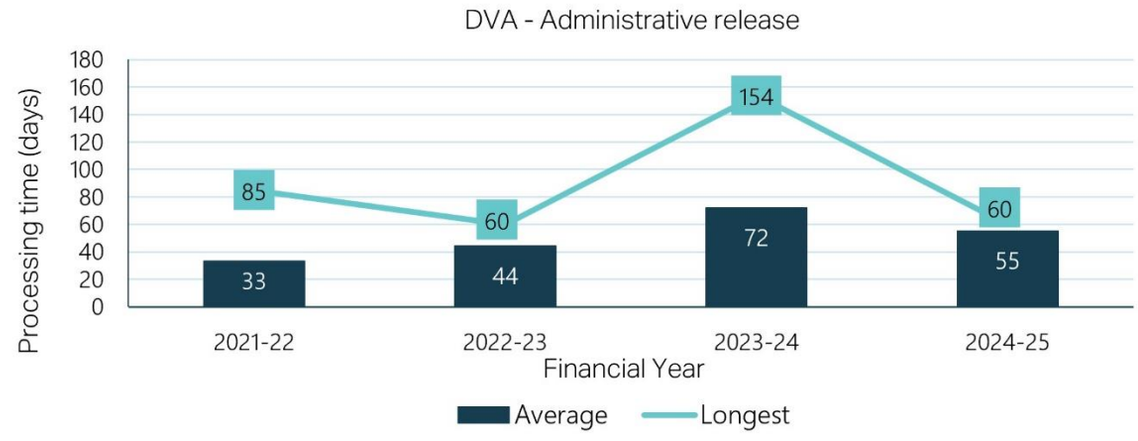
Nothing in the data provided, or in the public submissions, suggests applications are being inappropriately funnelled into an administrative release pathway when they should be being dealt with under a legislative process, in an attempt to avoid 'starting the clock' of legislative timeframes.

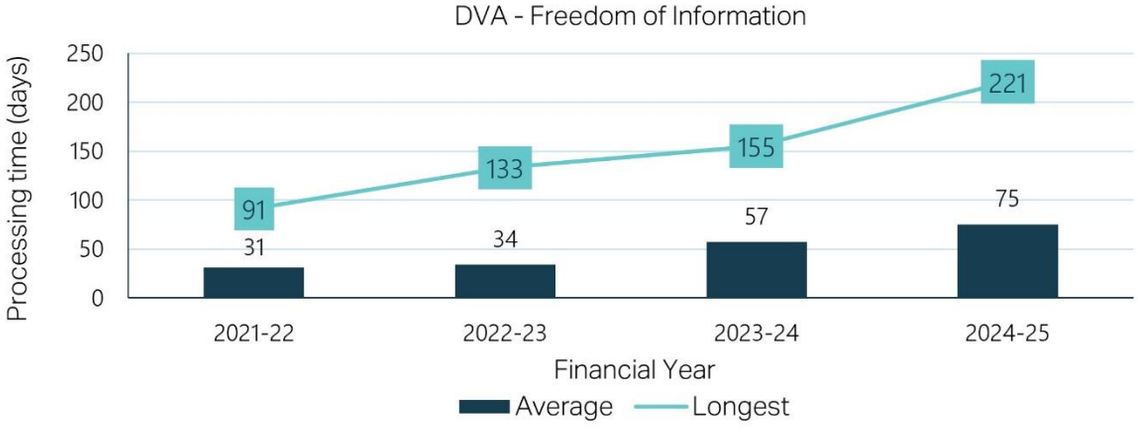
It is not clear from the data whether Defence has succeeded in making administrative release the primary pathway for information access; however, this may be because Defence receives more requests for non-personal information, making FOI the more appropriate pathway in the majority of cases. I do not have any evidence either way. However, Defence has taken clear steps to improve the system.

Timeliness of administrative release applications compared with FOI or Privacy applications

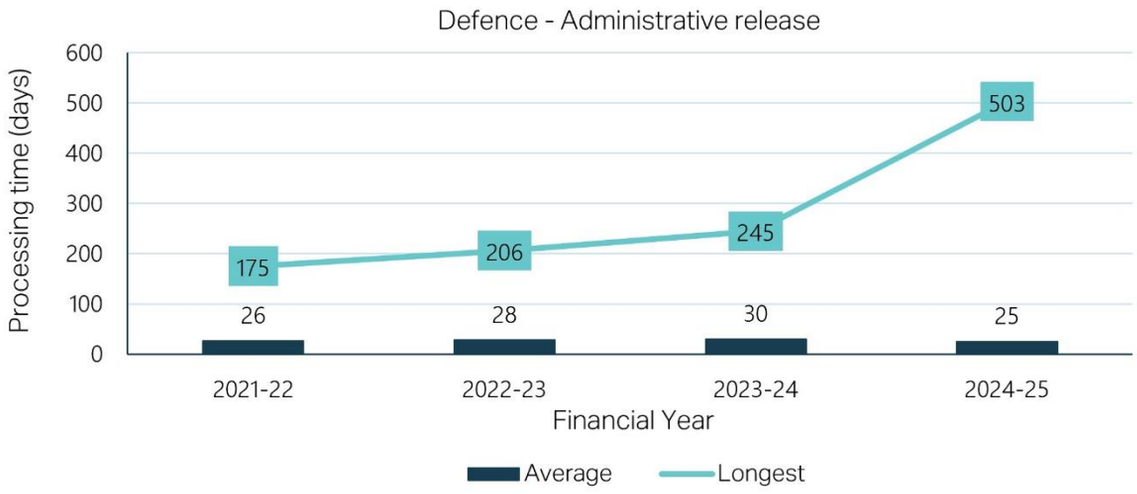
There is limited benefit in migrating more people to the administrative release pathway if it does not result in faster release of information. Public submissions demonstrated mixed views on whether processing timeframes or ease of access have improved, worsened, or stayed the same for both departments. However, almost all highlighted processing timeframes as a concern.

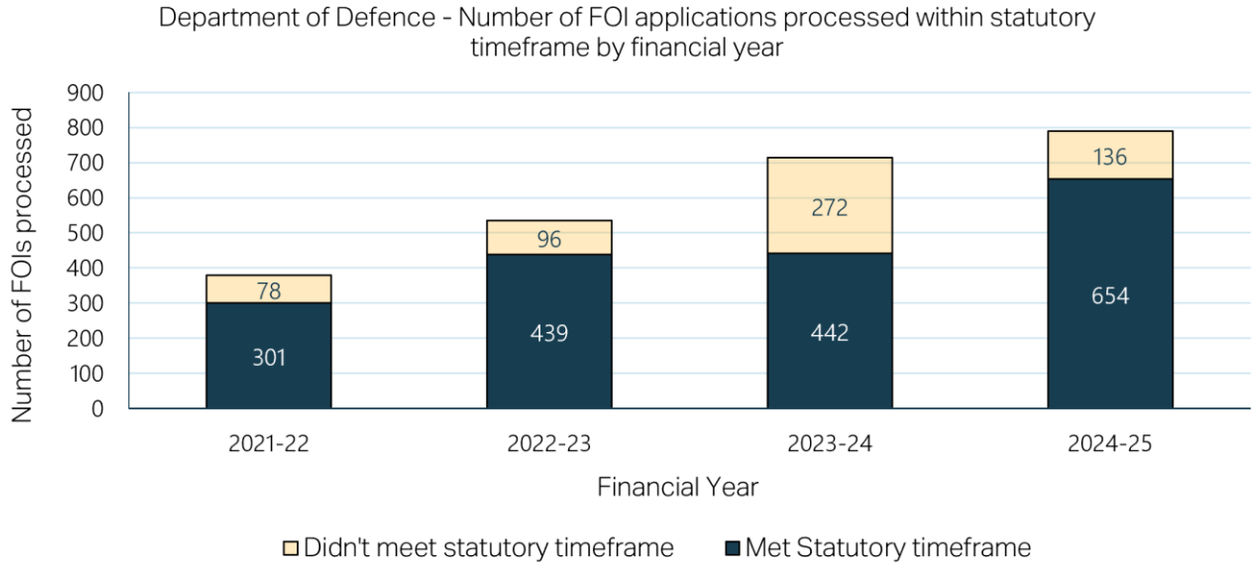
The following data are helpful to understand timeliness:





These data show that average processing times in DVA rose for both administrative release and FOI requests, by about 20 days and 40 days respectively, when compared to 2021-22. However, administrative release processing times have started to reduce again and in 2024-25 were below average processing times for FOI requests. DVA also provided data demonstrating the number of non-completed requests has risen.





Data provided by Defence shows that average processing times for administrative release remained low and generally slightly below the 30-day legislative timeframe for processing FOI applications. However, the longest time taken to process an administrative release application consistently increased. As with DVA, there appears to be a decrease in average processing times for administrative release applications in 2024-25.

Apart from a drop in 2023-24, Defence processes the majority of FOI applications within the 30-day statutory timeframe. This data also again demonstrates the significant increase in FOI applications received.

As a result, a concern going forward is whether the implementation of the IAUs is sustainable and adequately resourced, particularly in DVA, given the apparent increase in workload for the IAUs and FOI teams and the increase in processing timeframes. DVA acknowledged the need to strengthen

the IAU's resourcing and noted they are considering options to provide targeted surge capacity. This is a positive step. However, it remains to be seen whether targeted surge capacity is sufficient to adequately manage the number of requests in the long-term.

Processing timeframes are, of course, not the only measure of the effectiveness. Accessibility and ease of the process is also important. Submissions raised accessibility concerns for some users, particularly confusion between online forms and downloadable PDF forms. These users may benefit from clearer signposting of which form to use when applying online versus which form to print and mail to the department.

DVA reported only receiving 8 complaints relating to the IAU between 2022 and 2025. This was low when compared to the volume of requests and the feedback about processing timeframes and compared to the 20 complaints apparently received about the IAU in the 2025-26 financial year. By comparison, Defence recorded 16 complaints in 2024 and 31 in 2025.

As noted above, the guidance materials published appear to be clear and useful. However, I have insufficient data from Defence and DVA or from submissions to determine if serving and ex-serving members and their families find the documents clear and useful in practice.

At this stage, it is difficult to assess whether outcomes have truly improved for the people they are seeking to serve. Although it is promising, an increase in the use of the administrative release process compared to FOI does not, by itself, demonstrate that administrative release is resulting in better outcomes for those seeking information, such as faster or easier access to the relevant information. On average, Defence's administrative release timeframes are only a few days shorter than the 30-days statutory timeframe for FOI release. DVA's administrative release timeframes are now significantly shorter than their FOI processing timeframes, but this is a relatively recent (and positive) development.

> Trends in movement towards administrative release and average administrative release processing times are broadly positive. On this basis Defence and DVA are **on track to demonstrating effectiveness**, but more is needed to form an evidence-based view of whether the implementation of this recommendation has been effective. In particular, additional user feedback on the process would be useful.

With an improvement in data collection and impact measurement by both departments, I hope to be in a better position to make a full assessment when this recommendation is assessed as part of our second implementation progress report due in December 2030.

Recommendation 10

Co-design information to increase awareness of redactions for access requests

Recommendation 10: Co-design information to increase awareness of redactions for access requests

The Australian Government should co-design information to raise the awareness of redaction, and how it might apply to information provided to applicants seeking information.

Australian Government response

The Government **agrees** to this recommendation.

The Government, through Defence and DVA, will undertake co-design with serving and ex-serving Australian Defence Force members and families to raise awareness of redaction and how it applies to accessing information from Defence or DVA.

Defence and DVA have commenced work towards this recommendation.

Intent of Recommendation 10

The intent of this recommendation is to ensure the departments work with the Defence and veteran community to develop accessible guidance in relation to redactions and how and why they are applied to information.

Commissioner's findings

Government Status	Commissioner's Assessment	Did implementation improve outcomes for members and veterans?
Implemented	Partially Implemented	Insufficient evidence

Actions taken

- Defence and DVA engaged an independent consultant, who held 13 workshops with 94 serving and ex-serving members, their representatives, and family members in October and November 2022.
- DVA updated their redaction guidelines using insights from the workshops. Defence published updated redaction guidelines, intended to better align with DVA's guidelines, and be easier to read for the target audience.
- Defence introduced random quality-control sampling by the Customer Service Network of the IAU's redactions. They also indicated an intent to extend this to other areas.

Implementation

Both Defence and DVA took steps to implement this recommendation following acceptance in September 2022. DVA published updated redaction guidelines in March 2023.[5] Defence initially published updated redaction guidelines in March 2023, and updated them at the Minister for Defence Personnel's request in March 2024, to improve readability, align better with DVA's guidelines, and include additional information on the release of health records.[6] Defence also published a redaction factsheet.[7]

Two key aspects of the recommendation were for the information or guidelines to assist the community to understand the application of redactions and for the guidelines to be co-designed.

In short:

- both departments published guidelines aimed at assisting their staff to administer the FOI Act rather than assisting the community to understand redactions, and
- whilst those guidelines drew upon insights gleaned from co-design workshops, the guidelines were not ultimately finalised through a co-design process.

Co-design workshops took place in two rounds – one to map the starting position, and one to generate improvements. The majority of participants in the first round also took part in the second. The workshops resulted in insights from participants that Defence advised 'directly informed the education materials'. A third round to assess the finalised product was planned but ultimately did not proceed. Defence and DVA reported this was due to budgetary constraints and their view that sufficient improvement had been achieved.

Whilst the guidelines published appear well-aligned between Defence and DVA and are useful for Defence and DVA staff, neither document appears to be targeted at improving public understanding of redaction. Both guidelines are clearly laid out but use technical and legal language that may not be easily understood by a person unfamiliar with information release concepts. For example, the concept of 'more than minor redactions' could benefit from further clarification. Further explanation of the public interest test might also be useful, as this may be a confusing concept for applicants trying to use the guidelines to better understand why redactions have been made.

Whilst I accept submissions from both departments that publishing internal guidelines promotes transparency about their processes, I am not convinced that a guideline produced for the purpose of assisting staff to administer the provisions of the FOI Act is a substitute for user-friendly information that is easily accessible, easily understood and aimed at assisting those engaging with the process for the first time. I do not suggest replacing these documents, but rather they should be supplemented by clear, user-friendly public guidance.

The departments' websites and Defence's Redaction Factsheet have only very limited information (see page 18 of this report) and do not fill that gap. For example, the DVA website states that redactions may be made for 'security reasons' but does not explain what 'security reasons' might be.

It is not entirely clear, based on the information provided, whether the purpose of the workshops was co-design or consultation due to the lack of participant involvement in drafting the final product. Consultation is a positive step, but I do not consider it capable of meeting the full intent of the recommendation. True co-design, where the participants could have had meaningful input into the final

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[5] Department of Veterans' Affairs (DVA), *DVA Redaction Guidelines*, DVA, 2024, accessed 18 September 2026.
[6] Department of Defence, *Redaction information*, Defence website, n.d., accessed 18 September 2026.
[7] Department of Defence, *Redaction information*, Defence website, n.d., accessed 18 September 2026.

version of the product, would have significantly enhanced both my assurance and public confidence that the published material was designed with the public in mind and meaningfully incorporated the views of the Defence and veteran community.

Information on redactions is clearly signposted on both websites, however both guidelines could benefit from more prominent placement. I note, as discussed further in relation to Recommendation 13, it is much easier to find it on the Defence website.

The redaction material was updated in consultation with the Defence and veteran community. However, the published guidelines were aimed at assisting staff to administer the FOI Act rather than assist the community to understand the redaction process. User friendly, public guidance should be developed and designed with the Defence and veteran community to ensure it is accessible and useful to those engaging with it. On this basis I assess that Defence and DVA **partially implemented** this recommendation.

Effectiveness

In measuring the effectiveness of the implementation of this recommendation, it is useful to consider whether applicants are now more likely to understand the redaction process, complaint data, reviews or appeals of FOI decisions and accessibility.

Complaint data can help form part of the picture. FOI complaints to the Commonwealth Ombudsman generally stayed low and spikes in complaints matched spikes in overall FOI applications. The OAIC provided data on the percentage of FOI complaints relating to Australian Privacy Principle 12[8] (the release of personal information to the person to whom it relates). The percentage for both Defence and DVA was high in 2021-22 (20% and 25% respectively) but fell in 2022-23 for both departments. Rates hovered around 12% for DVA since. Defence rates fell to zero in 2024-25. These numbers are positive. However, as the data is not further broken down, it is not clear what portion of these relate to redactions rather than other aspects of personal information release or to what extent the implementation of the recommendations may have impacted this.

Defence and DVA surveyed the workshop participants prior to the finalisation of the guidelines. They asked participants whether their awareness of redaction would improve if the departments' planned concepts for changes to their information material were implemented (not on the finalised or nearly finished product). On average, workshop participants assessed their awareness of redaction would improve by 58.49% if planned concepts were implemented. However, this percentage varied significantly amongst participant groups, being highest with current serving members, and a significantly lower improvement in ex-serving members.

[8] Office of the Australian Information Commissioner, *Chapter 12: APP 12 Access to personal information*, 22 July 2019, accessed 18 September 2026.

This mechanism for assessing improvements to public understanding of how redactions are applied is limited. Asking workshop participants whether they thought their understanding of redactions would improve if changes were implemented is not a reliable indicator of the impact of the final products. It also does not take into account the potential additional understanding gained by workshop participants by being involved in the process, which may skew the results. Further, Defence advised that not all proposed concepts arising from these workshops were implemented.

Beyond indicating an intention to do so in the form of final benefit reviews, neither department appears to have planned for, or conducted, a review of the effectiveness of the finalised products. DVA commenced a preliminary review of the Redaction Guidelines in February 2026 to ensure ongoing alignment with Defence and current OAIC guidance, which is commendable, but does not address my concerns regarding the effectiveness of the documents at conveying information to the public. Defence introduced random quality-control sampling by the Customer Service Network of the IAU's redactions. They indicated an intent to extend this to other areas. However, it is not clear whether this occurred and, although commendable, this measure is not indicative of an improvement in the public's understanding of redactions.

Public submissions provided limited data on redaction awareness but indicated that in some cases applicants are not consistently being given information about redactions. One submission said the applicant would have benefitted from 'a better understanding of why the information had been redacted and an explanation of how to appeal the decision', and another stated that the reasons given were so broad as to be meaningless.



Firgure 1: *Defence's redaction factsheet contains limited information*

Although complaint numbers have decreased, it is not clear whether the measures implemented have provided clarity and transparency to applicants in practice. Without a way to measure an increased awareness of how redactions work, there is **insufficient evidence** to assess whether outcomes have improved.

Suggested action

In order to meaningfully implement this recommendation, Defence and DVA could consider:

- creating public facing education material aimed at improving the public's understanding of redactions with ease of understanding and accessibility in mind and test that material with the Defence and veteran community prior to publication
- additional ways to enhance understanding of redaction through the information release process, including consistently providing plain-language information to applicants.

Recommendation 11

Embed trauma-informed practices for information access

Recommendation 11: Embed trauma-informed practices for information access

Trauma-informed practices should be embedded in Defence and the Department of Veterans' Affairs (DVA) interactions with individuals seeking information from either department. These trauma-informed practices should form part of ongoing training for relevant personnel in each department.

Where possible, there should be a single point of contact within each of Defence and DVA to provide continuity and consistency to applicants seeking information from within each agency.

Australian Government response

The Government **agrees** to this recommendation.

The Government acknowledges that serving and ex-serving ADF members and their families may seek information at times of vulnerability or stress. The Government recognises that adopting a trauma-informed approach when interacting with a person seeking information, regardless of why that person is seeking information, provides an opportunity to better support current and former ADF members and their families.

The Government will leverage the work already undertaken by DVA through the Veteran Centric Reform program and the recent Defence improvements to information exchange practices, recognising that more needs to be done to ensure that a trauma-informed process is consistently applied across Defence and DVA.

The Government recognises the importance of the provision of a single point of contact for applicants and support to prepare and digest the information supplied as part of a trauma-informed process.

Defence and DVA have commenced work towards this recommendation

Intent of Recommendation 11

The intent of this recommendation is to embed trauma-informed practices, including a single point of contact, into all interactions with people seeking information from the departments.

Commissioner's findings

Government Status	Commissioner's Assessment	Did implementation improve outcomes for members and veterans?
Implemented	Implemented	Insufficient evidence

Actions taken

- Defence and DVA implemented the IAUs and a 'no wrong door approach'. This is intended to remove the burden from applicants to locate the correct point of contact and deal with multiple teams within departments.
- Implementation of a 'warm referral' mechanism:
  - between 1800 DEFENCE and 1800 VETERAN (that is, callers to one helpline can be transferred to the other, without having to make multiple calls), and
  - of requests for information received by one department requiring action by the other.
- Defence and DVA provided trauma-informed training and made it mandatory (including refreshers) for IAU staff.
  - DVA initially rolled out the Compassionate Foundations course from the Australian Public Service Commission (APSC), which has been independently accredited against Suicide Prevention Australia's Standards for Quality Improvement. They subsequently developed the DVA Trauma Informed Care Principles and Practice Training module, using internal subject matter experts and an external developer. I reviewed a slideshow of the course content, and it is aligned with DVA's trauma-informed principles. DVA also advised their Chief Psychiatrist works to support the alignment of training content with contemporary clinical practice and veteran experience.Defence's training was created through a custom provider and was based on the Compassionate Foundations course.
- Defence also incorporated some trauma-informed messaging in IAU email templates to assist when providing sensitive information to applicants.

Implementation

I am satisfied that Defence and DVA have taken steps to implement this recommendation which was accepted in September 2022. DVA established the IAU prior to 31 March 2023, and by the time DVA closed the recommendation in June 2023, all IAU staff had participated in the Compassionate Foundations course. Defence established the IAU in March 2023 and trauma-informed training went live in April 2024.

However, to meet the intent of this recommendation, trauma-informed practices should be 'embedded' into all interactions with people seeking information from the departments. This often requires more than structural changes and staff training.

IAUs as single point of contact

I acknowledge the IAUs, as a single point of contact for administrative release, play an important role in supporting a trauma-informed approach to interactions between individuals and the departments. However, each unit operates differently to achieve the aim of a 'single point of contact' for applicants.

Whilst DVA's IAU is a central resource responsible for managing all requests for information including FOI requests, administrative releases, subpoenas, and court orders, DVA's Information Release Policy states that:

> *Whilst staff should refer all FOI applications to the IAU, all staff can facilitate administrative access to information, by understanding and implementing the Administrative Release Guidelines. The Guidelines provide advice about when to escalate a request for information to the IAU.*

DVA further explained they

> [maintain] *a range of established self-service and business-as-usual release mechanisms, including MyService and other online channels, which allow veterans to access certain personal information directly or receive routine documents from relevant business areas without unnecessary escalation. This…supports timely…release of information.*

Whilst this approach may risk a lack of continuity in client service where requests need to be escalated, and delays if matters are not escalated promptly, I acknowledge that it may allow for faster information release in straightforward matters, which is a desirable outcome. I encourage DVA to monitor this and actively mitigate any emerging risks.

It appears that Defence's IAU only deals with personal information requests. Their FOI team still operates as the point of contact for FOI requests. This reduces consistency in case-management if requests are transferred between pathways, so it is difficult to say this arrangement meets the 'single point of contact' goal of the recommendation. Defence advised this is mitigated by strong internal controls allowing for seamless transfers of requests between the two pathways. They also contend it is appropriate based on the different legislative and policy frameworks surrounding the two different forms of information release. I accept that a seamless transfer process is a mitigation against disruption for applicants, but I do not have evidence as to how this is achieved. To be effective, such a process should involve:

- prompt identification of matters requiring transfer
- proactive communication with the applicant, and
- thorough handover processes to ensure work is not unnecessarily duplicated or delayed.

Positive steps have been taken. Although the IAUs are not operating as true single points of contact within either department, both Defence and DVA have implemented approaches that seek to balance the lack of continuity with other advantages such as faster self-service.

Trauma-informed training

I am pleased that both departments implemented trauma-informed training and made it available widely. However, they both need a clear plan going forward to embed ongoing trauma-informed training and practices. Across both departments there is a lack of clarity around which staff must undertake training, how often, and whether it is mandatory.

The number of staff who reportedly undertook the training in Defence is impressive – as of 3 February 2026, Defence reported their trauma-informed training had been completed 10,169 times. Defence requires IAU, FOI, and 1800 DEFENCE teams to complete trauma-informed training and 3-yearly refreshers, with the training 'highly recommended' across other units. This is important, as 1800 DEFENCE staff are often the first point of contact for many people seeking help with Defence processes. Defence also directed all Military Personnel Organisation staff and other workforces routinely engaged in managing sensitive information to complete the training by September 2024. I acknowledge this is no small undertaking and commend Defence for this effort.

DVA require annual training refreshers for IAU staff. Whilst the training is available to all staff and recommended for staff providing frontline services, it is not compulsory for any other areas, including 1800 VETERAN. Annual refreshers may be more effective than the 3-yearly ones required by Defence, particularly with staff turnover and movement between teams.

The public may also be served by an assurance there is a requirement for ongoing training, across all relevant staff including Senior Executive Staff (SES) positions. SES set the cultural tone of an organisation and are an important part of embedding policy in practice. In my view, any SES in charge of a client-facing area should be required to take this training. Pleasingly, Defence provided a preliminary indication of their support to expand training to these SES.

Embedding trauma-informed practices

I am pleased that both Defence and DVA have taken some steps to embed trauma-informed practices.

Both Defence and DVA developed high-level trauma-informed principles. Principles, along with regular staff training and strong policies and procedures, are important to embed practices. This multi-pronged approach assists to maintain standards when staff and leaders change within an organisation. The Defence principles include practical, actionable dot-points on ways the principles can be implemented. The DVA principles do not. These principles are not clearly embedded in the IAUs' policies or Standard Operating Procedures (SOPs) in either department. The principles staff learn in training must be embedded into agency practice in order to be effective. I am satisfied with the trauma-informed principles produced by both agencies, but disappointed that they are only lightly reflected in departmental policies and procedures. Without this, I am not confident that these processes have been embedded across practice.

Some Defence SOPs reference a degree of trauma-informed practice or demonstrate some sensitivity towards difficult subjects. For example, the IAU Request Registration SOP provides some information on engaging with potentially traumatised individuals. However, trauma-informed practice across the SOPs, where present, is limited and generalised. It would benefit in all cases from further specificity, including in relation to available supports for both staff and applicants.

Defence has taken a further step by creating some trauma-informed email templates to assist when providing sensitive or potentially traumatic information to applicants. However, these are slightly ambiguous (for example they refer to information as 'difficult to read', which does not necessarily imply that it may be traumatic). They may benefit from a broader range of templates or content, such as for circumstances where the information may contain mentions or pictures of deceased First Nations persons. They should also include contact details for recipients to seek support.

Defence has also incorporated trauma-informed guidance into their Complaints and Alternative Resolution Manual.

DVA's Administrative Release Guidelines reflect trauma-informed practice. Prioritising this simpler method of access is, itself, a trauma-informed approach, as it reduces some systemic barriers to information access. Providing multiple channels for contacting the IAU (email, phone, and post) is also a trauma-informed approach.

DVA provided a de-identified example of an email, which notes that information an applicant sought may be prejudicial to their health and states that it will be released to their nominated treating psychologist. This email makes it clear this process has been discussed with the applicant in advance. This is a good example of trauma-informed practice.

DVA advised the departments have implemented handover processes between their helplines. Applicants calling either 1800 DEFENCE or 1800 VETERAN can be transferred to the other helpline by staff, without needing to hang up and redial the correct helpline. Additionally, information access requests made to one department, but requiring some action by the other, can be transferred internally without needing to be returned to the applicant. This is a welcomed improvement.

DVA provided an internal guidance document evidencing this process, which includes a requirement that IAU staff seek the applicant's consent to transfer the request to Defence, or their agreement to

withdraw the request and remake it to Defence. This is an appropriate approach, allowing the applicant to maintain control of the request, but without unnecessarily burdening them.

Defence and DVA have taken steps to implement this recommendation including establishing IAUs and a single point of contact approach; training staff in trauma-informed practices; reflecting trauma-informed practices in some policies, procedures and templates; and creating warm transfer processes between the two departments. While I think more can be done to further embed trauma-informed practices into both departments, including a clear schedule for training and refreshers and a review of policies and procedures to further incorporate trauma-informed practices, I assess that Defence and DVA **implemented** this recommendation.

Effectiveness

In measuring the effectiveness of the implementation of this recommendation, we need to consider any reviews or benefit analysis undertaken by the departments and whether applicants' experience of engaging with the departments to access information has improved.

Public submissions we received reflected mixed feelings about interactions with Defence and DVA staff and whether the information access process is trauma-informed. Consistent with the need for ongoing internal evaluation, one submission rightly identified that:

> *alignment with best-practice principles requires monitoring and ongoing investment in implementation at individual, group and systems levels.*

Other feedback ranged from describing staff as professional, helpful, courteous, and engaged, to toxic and obstructive. Some submissions described difficulties with getting help via their preferred mode of contact, and others highlighted that the sometimes lengthy and complicated processes can exacerbate existing trauma. A number of submissions identified that veterans seeking information from DVA often feel judged or stigmatised for seeking their own information. One submission noted that FOI staff in both departments were 'professional and helpful' but felt that the business areas the FOI team had to liaise with inside the organisations were much more difficult.

In order to assess effectiveness, further evidence of the public experience of administrative release requests in DVA escalated from a business area to the IAU, and information requests in Defence transferred between the IAU and the FOI team or vice versa would be needed to determine whether the decision to take these split approaches over a single point of contact has been appropriate.

Defence conducted a benefits review in April 2024, indicating ongoing quality-assurance activities assessing whether information access interactions are conducted in a trauma-informed manner. I do not have any evidence as to how this was assessed or whether applicant feedback was considered. However, Defence did not provide evidence of having undertaken their planned benefits review in Quarter 3 of 2025, and the April 2024 review indicated some areas for improving review of effectiveness of Defence's measures.

I do not have any evidence of DVA conducting benefits reviews for this recommendation.

Neither DVA nor Defence conducted any post-implementation reviews or analysis that included user feedback to assist our assessment of effectiveness.

I note the Defence Program Board refused to consider this recommendation closed at the first closure request, as they assessed several parts of the recommendation as 'not implemented'. This demonstrates a commitment to ensuring the recommendation was properly implemented, with appropriate oversight.

It is clear the departments have taken this recommendation seriously and taken steps to implement and embed trauma-informed practices in their information access processes. However, there is **insufficient evidence** to assess whether the changes made have been effective in improving the experience for applicants.

Suggested actions

Defence and DVA could consider:

- incorporating trauma-informed practices and principles more explicitly into their IAU and FOI Standard Operating Procedures
- maintaining a single point of contact approach and case management across information release pathways, that is sufficiently resourced, trauma-informed, has a clear operating model, and is regularly evaluated for effectiveness
- developing and rolling-out a plan for ongoing trauma-informed training and refreshers across the departments, including actively considering other areas that may benefit from undertaking this training, such as business areas which are regularly called upon to provide information and SES officers.

Recommendation 12

Increase opportunities to provide up-to-date consent for information access

Recommendation 12: Increase opportunities to provide up-to-date consent for information access

By March 2023, the Australian Government should increase the number of opportunities for serving or ex-serving ADF members to provide or amend their consent to disclose information to family members or nominated representatives.

Australian Government response

The Government **agrees** to this recommendation.

The Government, through Defence and DVA, will optimise and increase the opportunities available to serving and ex-serving ADF members to provide or change consent to Defence or DVA to provide their personal information to other persons.

Defence and DVA have commenced work towards this recommendation.

Intent of Recommendation 12

Serving and ex-serving members should be provided with additional, easy, and regular ways by which they can provide or change their consent to share information with others.

Commissioner's findings

Government Status	Commissioner's Assessment	Did implementation improve outcomes for veterans and members?
Implemented	Partially Implemented	Insufficient evidence

Actions taken

- DVA undertook a review of current mechanisms for providing and amending consent and identified 'immediate opportunities to improve ways to provide or amend consent'.
- Defence and DVA undertook educational campaigns on consent for information access.
- Defence advised they created an additional opportunity for consent to be updated during transition by 'encouraging' Transition Coaches to address consent in transition discussions.

Implementation

Each department took some steps to implement this recommendation. Both departments conducted an education campaign, Defence commenced reviewing existing consent mechanisms in transition and health contexts and DVA conducted a review of existing consent mechanisms.

Defence advised they initially planned to:

- undertake a review of current mechanisms for providing and amending consent
- identify opportunities, and
- conduct a communication and education campaign to raise maximum awareness and understanding of these opportunities.

Reviewing current consent mechanisms

A progress report to the Defence Program Board in January 2023 indicated the review was completed. However, the Recommendation 12 Benefits Review provided by Defence contradicted this, finding no such review had been completed. Defence has subsequently advised the review was undertaken through a series of actions, rather than a single, stand-alone deliverable.

Defence's request to close Recommendation 12 also documented a post-closure action to 'implement an annual reminder to provide, update or withdraw consent for information access'. I have not been provided with evidence of whether this occurred.

At the time of closure, Defence elected not to take further action on three of the recommendations made in the Benefits Review to improve their implementation of Recommendation 12, namely:

- prioritising the review of current mechanisms and identifying further opportunities for consent provision or update
- investigating the feasibility of an online system to streamline providing, amending or withdrawing consent (Defence concluded this was 'out of scope'), and
- finalising co-design analysis with target audience to measure the effectiveness of products produced.

Defence subsequently reported the following review activities have been undertaken or are underway:

- A review of webform processes in 2022 which identified options for inclusion of 'consent' checkboxes.
- The Joint Transition Authority mapped how consent is reflected in the transition journey, identifying there is a lack of clarity and communications around withdrawal of consent and consent to share with family, and a lack of a central point to identify what consent has been given across multiple forms.
- The Defence Privacy Office commenced mapping health and wellbeing-related consent forms in late 2025.

A broader review of Defence consent forms is scheduled for 2027.

It appears work is ongoing to map current mechanisms for providing and amending consent and identify opportunities for improvement. This work is being done as part of Defence's implementation of Recommendation 68 of the Royal Commission's Final Report, which deals with the balance between upholding members' confidentiality and appropriately disclosing when they are in distress. I

acknowledge the overlap between these recommendations and accept that some measures may be more appropriately incorporated into the implementation of Recommendation 68.

However, the Defence review of consent mechanisms has been significantly delayed, particularly given an acknowledged finding of the co-design workshops conducted in 2022 was that 'Consent as a process needs to be formalised and structured. It is currently disorderly across the forces.' It is also not clear that work undertaken for Recommendation 68 will result in any new formalised consent opportunities.

DVA completed a review of existing consent mechanisms in October 2022. In March 2023 their Closure Report noted that immediate opportunities to improve ways to provide or amend consent had been identified. However, it is not clear whether these have or will be implemented. DVA also identified that consent forms and other consent information was collected by multiple business areas and stored in different, unconnected systems across the department. Harmonisation would require a significant investment in IT systems. DVA outlined a plan for scoping and costing these IT enhancements, and has advised they have undertaken significant baselining work through their Handling of Personal Information Project. However, I did not receive evidence of this work being conducted, and it is not clear when the scoping will take place.

Education campaigns

Both departments conducted an education campaign about consent. This included:

- updating existing materials, such as:
  - Information Release Policies for both departments – these are documents for IAU and related staff use, and do not present as easy to read by those not familiar with information release concepts.
  - Several Defence Intranet Fact Sheets and one combined Defence/DVA factsheet which are clear and straightforward, but lack useful detail for complex scenarios (such as probate).
  - Guidance for health practitioners around when information can be released.
- Defence advised they worked together with DVA to align consent forms for information access, creating content with a consistent language, look and feel across both agencies, so that Defence forms have a consistent format both inside and outside the Defence network.
- Defence also released an internal notice in April 2024, providing a link to Defence personnel to guidance and fact sheets on consent, accessing personal information, and third-party requests for personal information.
- Both departments posted on social media platforms – Defence announcing improvements implemented in response to the interim recommendations and DVA promoting its new website content.

I consider education campaigns valuable in that they remind members and veterans of the importance of updating consent. However, a point-in-time campaign is necessarily limited and will not continue to benefit members and veterans in the future. For it to be truly effective, ongoing education is required.

Other actions taken

DVA also reported that from March 2023 their IAU strengthened its operational emphasis on re-validating consent for subsequent information access requests (in cases where consent had already been given to release information to a third party in relation to a previous request). They also noted the IAU 'contacts applicants directly where current consent information is not available'. This appears to have been part of IAU implementation. I also note, however, that DVA does not appear to have addressed the Royal Commission's concern regarding more long-term consent for loved ones and next-of-kin who are not named executors of a will, allowing them to access relevant information about a deceased member.

Defence indicated they created an additional opportunity for consent to be updated during transition by 'encouraging' Transition Coaches to address consent in transition discussions. This appears to be a reminder for a member to update consent at this point, rather than a new opportunity for the member to actively do so within that discussion. However, I acknowledge that a member or veteran being informed or reminded of the possibility to update consent by either department may function as a prompt for them to do so, which goes some way towards the intent of the recommendation.

Defence also noted that 'members are able to provide, amend or withdraw consent at any time and that numerous existing consent mechanisms already operate throughout a member's career at any time … rather than being restricted to a small number of formal events.'

But crucially, neither department appears to have implemented any additional opportunities for members or veterans to update consent. DVA has explained this is, in part, due to the significant cost uplift that would be required to implement the necessary IT. It does not appear that DVA has taken any steps to scope, cost, or otherwise advance such a project. Defence is yet to take action on the recommendations contained in its closure report to identify opportunities for consent provision or update, scope the feasibility of an online system to assist, and co-design effectiveness measures.

Serving and ex-serving members have not been provided with additional, easy, and regular ways by which they can provide or change their consent to share information with others.

On the basis that some steps have been taken to provide members and veterans a greater understanding of consent mechanisms and encourage them to update their consent, as well as review current consent mechanisms and identify further opportunities for consent provision or update, I assess that Defence and DVA **partially implemented** this recommendation with timeliness concerns.

I will continue to review Defence's implementation of this recommendation as their work on Recommendation 68 progresses.

Effectiveness

In measuring the effectiveness of the implementation of this recommendation, we would need to consider the number and accessibility of avenues to provide or update consent, the awareness of serving and ex-serving members of these avenues and data reflecting usage of these avenues to provide or update consent. None of this information was available.

I have little information to assess whether the education campaigns undertaken were effective, such as numbers of members or veterans with up-to-date consent arrangements and numbers of members or veterans proactively updating them. DVA provided data on website hits on its new consent material for the first month after publication, but without comparison these numbers do not demonstrate effectiveness, and neither department appears to have conducted any subsequent review that would assist with measuring effectiveness.

One ex-service organisation stated in a submission that their members feel 'providing or changing consent to disclose information has become a faster and easier process', which is positive. However, it is not clear what measures may have led to this change.

Other submissions to this Inquiry showed ongoing frustrations with information being released without consent, and conversely, being withheld even where consent is given. One veteran organisation told the Commission:

> *Veterans routinely tell us that deeply personal medical, psychological and service records have been exchanged across agencies with little transparency, yet when a trusted partner or advocate seeks information to help, they are blocked by rigid interpretations of privacy rules. This inconsistency causes real harm.*

Whilst this feedback goes beyond the intent of this recommendation, it highlights the frustration that can occur if consent is not clear.

There is **insufficient evidence** to assess whether the changes made have been effective in increasing serving and ex-serving members' up-to-date consent to share information with others.

Suggested actions

In order to meaningfully implement this recommendation, the following actions should be considered:

- Defence should implement the recommendations arising from their Closure Report.
- DVA should actively consider implementation of the mechanisms referenced in their Closure Report to improve ways to provide or amend consent.

Recommendation 13

Co-design education on information access mechanisms

Recommendation 13: Co-design education on information access mechanisms

The Australian Government should engage with serving and ex-serving ADF members and their families in order to complete, by March 2023, co-designed education material on information access mechanisms used by Defence and the Department of Veterans' Affairs (DVA). Educational material should be targeted to serving and ex-serving ADF members and their families.

Australian Government response

The Government **agrees** to this recommendation.

The Government, through Defence and DVA, will co-design education material, targeted to serving and ex-serving ADF members and their families, to enhance their understanding of the information access mechanisms and the trauma-informed supports available to those accessing information.

Defence and DVA have commenced work towards this recommendation.

Intent of Recommendation 13

The intent of this recommendation is to ensure the departments work with the Defence and veteran community to develop accessible guidance about ways to access information from Defence and DVA.

Commissioner's findings

Government Status	Commissioner's Assessment	Did implementation improve outcomes for members and veterans?
Implemented	Partially Implemented	Insufficient evidence

Actions taken

- Defence and DVA engaged an independent consultant, who held 13 workshops with 94 serving and ex-serving members, their representatives, and family members in October and November 2022 (about recommendations 10 and 13).
- As noted in Recommendation 10, both departments released a suite of materials on information access including Administrative Release, FOI and the Privacy Act.

Implementation

Both departments accepted this recommendation in September 2022. Defence published a suite of updated guidance material on 28 February 2023 and closed this recommendation on 22 March 2023. DVA closed the Recommendation on19 June 2023. The published material included documents already canvassed in this report, including:

- updates to website content
- updated Administrative Release Guidelines and Information Release Policies
- redaction guidelines, and
- internal and external factsheets.

These documents were produced following consultation through the workshops previously discussed.

Both departments' websites are clear and informative. They can be easy to navigate if a person lands on the Accessing Information pages through a search engine result but can be harder to find if a person starts from the department's homepage. Defence's Accessing Information page can be easily found from the homepage under the 'About' drop-down and immediately provides a brief description of Personal Information Requests and FOI Requests.

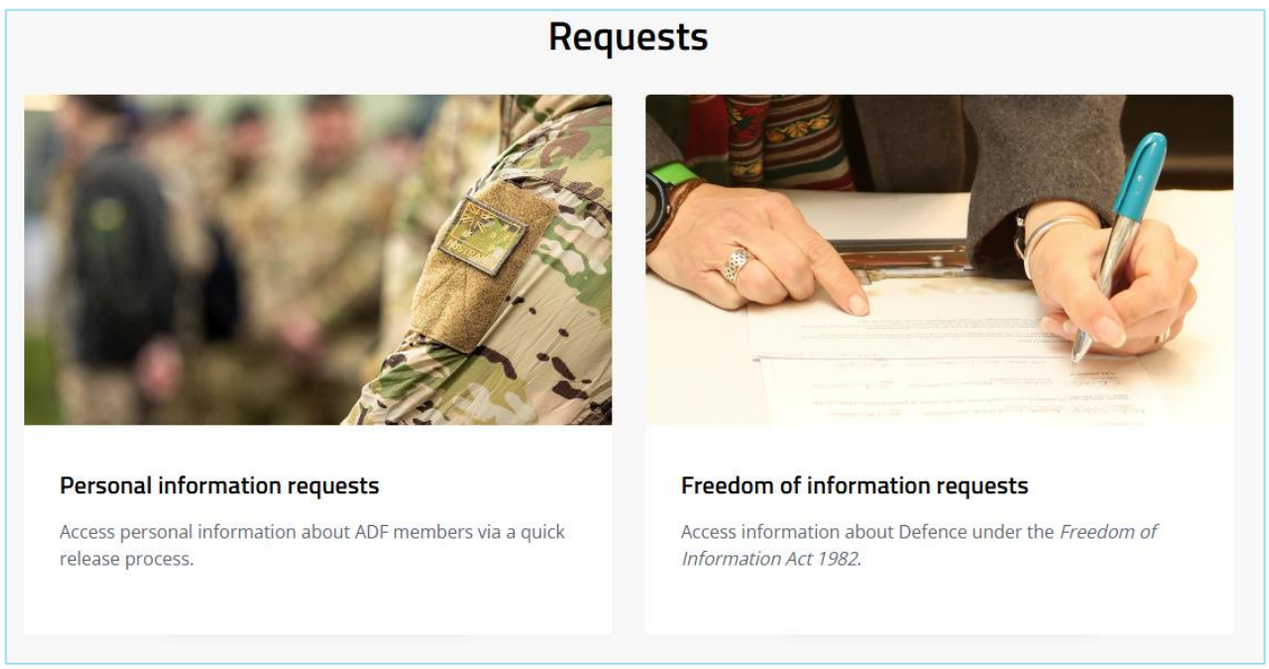


Figure 2: *Defence's Accessing Information page, providing brief information on each pathway*

DVA's website requires a user to locate the 'What We Help With' menu, and then 'Accessing Information'. This leads to a sub-menu with no information about which pathway is more appropriate and is not overly intuitive.



Figure 3: *DVA's Accessing Information website pathway*

Both websites could benefit from making the hard-copy downloadable forms more distinct from the online application process for users who prefer traditional methods of communication.

As discussed, the guidelines intended for the public produced by both departments are generally clear and helpful. However, the Policy documents designed for staff use (for example, the Information Release Policies and Redaction Policies) are not tailored for use by the public.

Defence's Information Release Policy adds an element of public accountability to Defence's approach to information release, which I welcome. Defence advised they will undertake a review within five years of publication. Defence could consider including this in the document or on the hosting webpage to reassure the public they are reviewing actions against the expected outcomes listed in the Policy.

Currently, DVA issues automated responses upon receipt of an FOI request, confirming:

- date of receipt
- the commencement of the 30-day processing period, and
- a reference number.

One public submission suggested that the response could be enhanced to include:

- the exact statutory due date for the decision under the *Freedom of Information Act 1982*
- information explaining the deemed refusal provisions of the Act if a decision is not made within the statutory timeframe
- guidance on the review rights available to the applicant, including Information Commissioner review.

These are logical additions. The departments could also consider what other practical information might be included in automated responses to enhance public understanding of the FOI process.

I am also satisfied the intent of this recommendation was at least partially met, based on the genuine efforts undertaken by both departments to produce materials of use for the public. However, for the reasons explained in relation to Recommendation 10, although consultation is a positive step, without true co-design of the final product/s I do not consider the full intent of the recommendation has been met. I am also concerned about the suitability of some of the material for public understanding of the process, for example the Redaction Guidelines.

Unless that material is aimed at the community it is trying to assist, the intent of this recommendation will not be met.

Although the consultation was a positive step, and multiple information products across both departments have been updated, neither department engaged in a true co-design process to finalise the products, and there is scope for improvement in the public-facing material. For these reasons I assess that Defence and DVA **partially implemented** this recommendation.

Effectiveness

To measure the effectiveness of these actions, I would need to consider accessibility of this information, consumer feedback, complaint data, and user testing. This data is very limited so I have drawn largely from the public submissions I received.

Defence's ServiceConnect received a relatively small number of complaints compared to usage, but those complaints reflected access issues and processing delays. Public submissions also indicated user difficulty with Defence systems for people who have changed their names (e.g. women who have married or divorced). I have no complaint data regarding these materials or systems from DVA. Submissions indicate various issues with the websites. One submission noted the AI search function on DVA's website produces inconsistent results and 'the sheer volume of material presented can be daunting and difficult to navigate effectively.' I also note feedback from RSL Queensland above about older users having difficulties navigating the website and correctly identifying the appropriate forms.

Submissions also indicated access to information about a deceased member has been consistently identified as problematic – executors named in wills, or people authorised by those executors, have difficulty obtaining information from Defence and DVA without a grant of probate or letters of administration. They experienced this even where probate is not otherwise legally necessary. The guidance material would benefit from additional information on this issue, particularly in circumstances where there is no evidence of probate or letters of administration. Including a point of contact in Defence and DVA in relation to this issue could also assist.

This may also be an opportunity for the departments to explore when considering additional consent opportunities in relation to Recommendation 12.

Despite recommendations by the Defence Program Board, it does not appear that further benefits reviews were conducted beyond the delayed first review reported upon in April 2024. I outlined the limitations in the method of asking the workshop participants whether their understanding *would* increase *if* measures were implemented in relation to Recommendation 10. In response to my preliminary findings, DVA advised that the successful increase of administrative release as the preferred information pathway indicates a better public understanding of the most appropriate access pathways. I accept this. However, this is only one component of the information access ecosystem.

There is **insufficient evidence** to assess whether the changes made to the information available to the public about the ways to access information in Defence and DVA have been effective.

Suggested action

In order to meaningfully implement this recommendation, Defence and DVA should consider:

- Reviewing existing guidance material and, where necessary, update it or produce new material that it is fit-for-purpose to enhance public understanding of information release, and test that material with the Defence and veteran community prior to publication.

Conclusions and Recommendation

Effectiveness of the reforms implemented in response to these recommendations was difficult to assess because both Defence and DVA lacked a concrete plan to assess the effectiveness.

Well-designed review and evaluation would also demonstrate to the Defence and veteran community that Defence and DVA are committed to genuine improvement.

Both departments should take steps to evaluate the work they have done to implement the Royal Commission's interim recommendations and adjust course if it isn't achieving improved outcomes. To this end, I make one recommendation aimed at putting mechanisms in place to track and evaluate if the changes made are making a positive difference for Defence members, veterans and their families.

I recommend that:

1. Defence and DVA each:
    a. establish a framework for assessing the effectiveness of implemented recommendations, incorporating feedback from the member and veteran community and relevant data
    b. undertake an immediate review of the effectiveness of the measures implemented to date in response to these Royal Commission's recommendations and address areas in which the measures are not effective.

Defence and Veterans' Service Commission
Access to Information Inquiry Report
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Appendix A

Department of Defence responses

The Department of Defence was given the opportunity to review and respond to critical findings made by the Commissioner through the Access to Information Inquiry.

Recommendation 9: Improve administrative release of information

The intent of this recommendation is to provide clear guidance to applicants and proactively prioritise administrative release as a preferred pathway for accessing information from Defence and DVA.

Government Status	Commissioner's Assessment	Did implementation improve outcomes for Defence members and veterans?
Implemented	Implemented	On track – This means there are indications the improvements are having a position impact but more information is needed to form an evidence-based view of effectiveness.

Defence and Veterans' Service Commissioner's recommendation 9 findings

1. Defence's website clearly directs users to administrative release over Freedom of Information (FOI) requests and clearly states that FOI applications relating to personal information will be treated by administrative release. I do not, however, have evidence as to whether, or to what extent, an applicant is consulted in this process.
2. Defence did not provide evidence on the number FOI requests that were finalised through administrative release.
3. Defence's website directs users to administrative release as a primary information access pathway. This appears to be an effective measure, but without data I cannot properly assess its effectiveness.
4. Defence has not demonstrated success in making administrative release the primary pathway for information access. However, this may be because Defence receives more requests for non-personal information, making FOI the more appropriate pathway in the majority of cases. I do not have evidence either way.
5. The majority of public submissions highlighted processing timeframes as a concern. My greatest concern going forward is whether the implementation of the Information Access Unit (IAU) is sustainable and the unit adequately resourced.
6. Submissions also raised concerns around the accessibility of documents, particularly regarding confusion between online forms and downloadable PDF forms.
7. I have insufficient evidence from Defence to determine if serving and ex-serving members and their families find the documents clear and useful in practice.
8. Defence has no built-in methods to measure the impact of their actions in relation to prioritising and improving the administrative release process. Nor have they conducted subsequent reviews of their actions. This means Defence is not measuring whether they have truly improved outcomes for applicants.
9. Defence is on track to demonstrating effectiveness, but more is needed to form an evidence-based view of whether the implementation of this recommendation has been effective.

Defence response

Defence welcomes the DVSC's assessment that Recommendation 9 has been implemented and shares the view expressed by the Commissioner that outcomes are on track, while recognising that further evidence will strengthen assessment of long-term effectiveness. Defence remains committed to ensuring administrative release is the preferred and most accessible pathway for individuals seeking information from Defence.

Since implementation of the recommendation, simplifying access arrangements, reducing reliance on formal FOI processes where appropriate, improving timeliness, and enhancing the overall customer experience has been the focus.

Administrative release is now clearly established as Defence's primary pathway for access to personal information and records. Defence's public-facing information directs applicants towards administrative release in preference to FOI wherever appropriate, and requests received through FOI that are more appropriately managed through administrative release are handled in accordance with section 15A of the Freedom of Information Act 1982. Where a request is transferred, applicants are notified of the transfer and supported through the process, ensuring their request progresses though the most efficient and suitable access mechanism available. This approach reflects Defence's commitment to reducing unnecessary administrative burden on applicants while facilitating faster access to information.

The effectiveness of this approach is demonstrated by the volume of requests managed through administrative release pathways. Between 2021–22 and 2024–25, the Information Access Unit (IAU) processed more than 100,000 administrative release requests, compared with 596 FOI completions relating to personnel records. These figures demonstrate that administrative release has become the predominant mechanism through which Defence provides access to personal information. While Defence FOI does not maintain reporting on all requests ultimately finalised through administrative release after referral to business areas, the available data clearly indicates that administrative release is operating as the primary access pathway envisioned by the recommendation.

Financial Year	Personal records requests completed by IAU	Personal records requests completed (granted in full or in part) by FOI
2021-22	22,716	100
2022-23	20,982	160
2023-24	21,442	135
2024-25	35,292	201
Total	100,432	596

Defence acknowledges the DVSC's interest in evidence demonstrating the effectiveness of these reforms and notes that the establishment of the Information Access Unit has delivered measurable service improvements. Since the IAU's establishment, the timeliness of processing information requests has improved significantly, with requests completed within legislative requirements increasing from 57 per cent in 2021 to 79 per cent in 2026. The IAU actively monitors demand and workload trends to ensure resources remain aligned with service requirements and continues to be a priority capability for Defence following its establishment in response to the Royal Commission into Defence and Veteran Suicide Interim Report. Complete digitisation of all ADF member records is on

track to be completed by August 2026, which is expected to further improve efficiency, accessibility and records retrieval.

The IAU continues to support multiple pathways for applicants to request information, including ServiceConnect, online forms, email, telephone, mail and PDF-based submissions. While ServiceConnect remains the preferred access channel, Defence maintains a range of options to support accessibility and individual preferences. Defence regularly reviews service delivery arrangements, communication products and guidance materials, including the Information Access Unit brochure, and engages with ex-service organisations to identify opportunities for continual improvement. To date, systemic concerns relating to the clarity of available forms or guidance materials have not been identified. Defence shares the view expressed by the DVSC that additional evidence would assist in determining whether customers find information products clear and useful in practice. Customer experience is currently measured through several feedback mechanisms, including ServiceConnect feedback functions and links contained in IAU correspondence. Feedback received to date has primarily related to technical or system issues rather than concerns regarding the clarity or usefulness of information products. While Defence has not identified any widespread concerns through existing channels, it recognises the value of continuing to collect customer insights and welcomes any further feedback identified through the DVSC's consultation processes to inform ongoing improvements.

More broadly, Defence agrees that the ongoing effectiveness of administrative release arrangements must continue to be demonstrated through evidence and evaluation. Existing performance measures, including service level achievement, customer feedback mechanisms and workload monitoring, provide Defence with important indicators of performance and customer experience. Defence will continue to mature these arrangements and identify opportunities to strengthen its evidence base regarding applicant outcomes, service effectiveness and customer satisfaction.

Overall, Recommendation 9 has successfully achieved its intended outcome. Administrative release is now clearly established as the preferred and primary mechanism for accessing personal information held by Defence; information pathways have been simplified; processing performance has improved; and significant investment has been made in the Information Access Unit to support sustainable delivery. While there are opportunities to further strengthen evaluation and outcome measurement, the available evidence demonstrates that the reforms introduced under Recommendation 9 are operating as intended and are contributing to improved access to information for serving and former Defence personnel and their families.

Defence and Veterans' Service Commission annotations

The DVSC made the following amendments to the critical findings on the basis of this additional information:

We added this text: 'Defence advised that information access requests received in other parts of the Department are acknowledged by the recipient and forwarded to the IAU for further handling.'

We added this text in relation to website navigation: 'These users may benefit from clearer signposting of which form to use when applying online versus which form to print and mail to the Department.'

We added this text in relation to assessing effectiveness: 'In particular, additional user feedback on the process would be useful.'

The DVSC did not change its conclusion as to the status of this recommendation.

Recommendation 10: Co-design information to increase awareness of redactions for access requests

The intent of this recommendation is to ensure the departments work together with the Defence and veteran community to develop accessible guidance in relation to redactions and how and why they are applied.

Government Status	Commissioner's Assessment	Did implementation improve outcomes for Defence members and veterans?
Implemented	Partially Implemented	Insufficient evidence

Defence and Veterans' Service Commissioner's recommendation 10 findings

1. In relation the Redaction Guidelines:
    a. Whilst the guidelines published appear well-aligned between Defence and the Department of Veterans' Affairs (DVA) and are clear and user-friendly, the Defence guidelines would benefit from further clarification (e.g. the concept of 'more than minor redactions').
    b. Since the guidelines are publicly available, further explanation of the public interest test might also be useful, as this may be a confusing concept for applicants trying to use the guidelines to better understand how redactions are applied.
    c. The guidelines use technical and legislative language that may not be easily understood by a person unfamiliar with information release concepts. They do not appear clearly targeted at improving public understanding of redactions.
2. It is unclear why Defence determined that updating guidelines intended for their staff and publishing these was preferred over producing something specifically designed for the public, who do not have the same understanding of FOI or privacy principles. I am not convinced that a guideline produced for the purpose of assisting staff to administer the provisions of the FOI Act is a valid substitute for user-friendly information that is easily accessible, easily understood and aimed at assisting those engaging with the process for the first time.
3. Defence's website and redaction factsheet both have only very limited information about redaction, and do not fill the gap left by the deficiencies in the Redaction Guidelines.
4. The workshops undertaken by Defence with a range of stakeholders appear to have constituted consultation rather than co-design, due to a lack of participant involvement in drafting the final product.
    a. True co-design, where the participants could have had meaningful input into the final version of the product, would have significantly enhanced both my assurance and public confidence that the published material was designed with the ordinary user in mind and meaningfully incorporated the views of the ADF community.
    b. The Guidelines were ultimately not finalised through a co-design process.
5. The mechanism used in the 'co-design' workshops for assessing improvements to public understanding of how redactions are applied is limited and flawed.
    a. Asking workshop participants whether they thought their understanding of redactions would improve if changes were implemented is not a reliable indicator of the impact of the final products.
    b. It also does not take into account the potential additional understanding gained by workshop participants by being involved in the process, which may skew the results.

c. Further, Defence has noted that not all proposed concepts arising from these workshops were actually implemented - it is not clear whether participant assessments were contingent on them all being implemented.
d. I do not consider this capable of meeting the full intent of the recommendation.

6. Defence does not appear to have planned for, or conducted, any review of the effectiveness of the finalised products.
7. Information about redactions is clearly signposted on the Defence website, but the Guidelines would benefit from more prominent placement.
8. The Guidelines are not designed with the public in mind, and the information on Defence's website and the Redaction factsheet are not effective substitutes.
9. Public submissions indicate that applicants are not consistently being given information about redactions.
10. Defence introduced random quality-control sampling by the Customer Service Network of the IAU's redactions, and indicated an intent to extend this to other areas. However, it is not clear whether this occurred, and this measure is not indicative of an improvement in the public's understanding of redactions.
11. Defence has partially implemented this recommendation.
12. There is insufficient evidence to assess whether outcomes have improved.

Defence response

Defence acknowledges the DVSC's assessment that Recommendation 10 has been partially implemented and appreciates the detailed observations provided regarding the Redaction Guidelines, supporting communication products, and the effectiveness of stakeholder engagement activities. Defence remains committed to ensuring that applicants understand how and why information is redacted and recognises that improving transparency and public understanding requires ongoing refinement of information products, engagement approaches and evaluation mechanisms.

In implementing this recommendation, Defence worked closely with the Department of Veterans' Affairs (DVA) to develop a consistent and aligned framework for redaction decision-making and information release across both agencies. The Redaction Guidelines were developed through extensive inter-agency collaboration and Ministerial engagement to ensure an appropriate balance between legislative compliance, consistency of decision-making and applicant understanding. The publication of the Redaction Guidelines was intended to improve transparency by providing visibility of the framework, principles and considerations applied by Defence and DVA when making redaction decisions.

Defence shares the view expressed by the DVSC's that some concepts within the Guidelines may benefit from further clarification, including references to "more than minor redactions" and the application of the public interest test. While aspects of the Guidelines necessarily contain technical and legislative terminology drawn from the Freedom of Information Act 1982 and the Privacy Act 1988, this may be less accessible to individuals unfamiliar with information access processes. These elements were included to accurately reflect the legislative framework governing information release decisions, Defence accepts there may be opportunities to improve clarity and accessibility for members of the public without diminishing legal accuracy or consistency with DVA. Defence will continue to monitor the operation of the Guidelines and consider stakeholder feedback to identify opportunities for enhancement.

Defence also shares the view expressed by the DVSC that information designed specifically for the public may provide additional value beyond the publication of staff-facing guidance. While the Redaction Guidelines were primarily developed to support consistent decision-making by Defence personnel, their publication was an important transparency measure that enabled applicants to better understand the considerations underpinning redaction decisions. Defence further recognises there

may be opportunities to strengthen supporting customer-facing materials and improve public understanding through complementary guidance products, website content and explanatory resources. Review of these materials in partnership with DVA to ensure they remain fit for purpose and responsive to applicant needs will be a continuing process.

With respect to stakeholder engagement, Defence recognises the distinction drawn by the DVSC between consultation and co-design. While a final validation stage involving participants did not occur prior to publication of the final products, there was extensive engagement throughout development, including workshops, working groups, concept testing and usability activities involving serving and former members, family representatives, advocates and other stakeholders. Feedback obtained through these activities informed the development of information access education materials, consent arrangements, trauma-informed practices guidance and the Redaction Guidelines. The resulting products were designed to address themes raised by participants, including the need for greater transparency, consistency between Defence and DVA, and improved understanding of information access processes. Defence accepts there are lessons to be applied in future co- design activities and will continue to engage stakeholders in the ongoing review and refinement of information access products.

Defence shares the view expressed by the DVSC that workshop outcomes should not be viewed as a standalone measure of effectiveness. The workshops were designed to test concepts, identify areas of confusion and inform product development rather than evaluate final outcomes. While participant feedback suggested that proposed changes would significantly improve understanding of redactions, this does not constitute definitive evidence of improved public understanding once products have been implemented. The need for stronger evaluation mechanisms and more direct evidence of applicant outcomes is accepted.

Defence also acknowledges that a discrete post-implementation review of the finalised products has not been undertaken. Instead, Defence has adopted a continuous improvement approach, relying on stakeholder feedback, operational experience and ongoing collaboration with DVA to identify opportunities for refinement. In light of the DVSC's observations, Defence recognises the value of strengthening its evidence base regarding the effectiveness of the Redaction Guidelines and associated educational materials. Defence will continue reviewing its redaction policies, processes and customer-facing products and will undertake a review of the Guidelines by NLT the end of February 2027 to further assess opportunities to improve accessibility, clarity and usability for applicants.

Defence welcomes the DVSC sharing relevant feedback from public submissions as part of their draft Report. This will assist Defence in identifying opportunities to review our policy and processes and improve access to information. While information is available through Defence's website, Redaction Factsheet, correspondence templates and the published Redaction Guidelines, Defence recognises that the applicant experience may vary across different request types and access pathways. Defence will continue to consider opportunities to improve consistency of communication and strengthen awareness of available explanatory materials.

The DVSC's comments regarding quality assurance activities are noted. While the centralisation of administrative release redaction activities within the Information Access Unit has reduced the need for broader quality assurance arrangements across multiple business areas, Defence agrees that quality assurance measures are primarily designed to improve consistency, accuracy and transparency of redaction decisions rather than directly measure public understanding. Nevertheless, these activities contribute to greater consistency in applicant experience and help build confidence in Defence's information access processes.

Overall, substantial progress has been made toward the intent of Recommendation 10 through the development and publication of the Redaction Guidelines, the creation of supporting educational

materials, collaboration with DVA to achieve a consistent cross-government approach, and stakeholder engagement that informed product development. Defence also acknowledges the opportunities identified by the DVSC to strengthen public-facing information, improve accessibility of guidance materials, enhance evaluation of outcomes, and further involve stakeholders in future reviews. Defence remains committed to continuous improvement in these areas and to ensuring that individuals seeking information from Defence are better able to understand how and why redactions are applied.

Based on the additional information and evidence in this response, Defence seeks your consideration of a further review of your findings.

Defence and Veterans' Service Commission annotations

The DVSC made the following amendments to the critical findings on the basis of this additional information:

We added the text: 'Whilst I accept submissions from both departments that publishing internal guidelines promotes transparency about their processes, I am not convinced that a guideline produced for the purpose of assisting staff to administer the provisions of the FOI Act is a substitute for user-friendly information that is easily accessible, easily understood and aimed at assisting those engaging with the process for the first time. I do not suggest replacing these documents, but rather they should be supplemented by clear, user-friendly public guidance.'

DVSC did not change its conclusion as to the status of this recommendation.

Recommendation 11: Embed trauma-informed practices for information access

The intention of this recommendation is to embed trauma-informed practices, including a single point of contact, into all interactions with people seeking information from the departments.

Government Status	Commissioner's Assessment	Did implementation improve outcomes for Defence members and veterans?
Implemented	Partially Implemented – subsequently updated to Implemented	Insufficient evidence

Defence and Veterans' Service Commissioner's recommendation 11 findings

1. Defence's IAU only handles personal information requests, and the FOI team still operates as the point of contact for FOI requests.
    a. This reduces consistency in case- management if requests are transferred between pathways, so it is difficult say this arrangement meets the 'single point of contact' goal of the recommendation.
2. Defence IAU and FOI staff are required to undertake the trauma-informed training and 3- yearly refreshers. However, it is not clear whether it is also mandatory for 1800 Defence staff. This is important, as 1800 Defence staff are the first point of contact for many people seeking help with Defence processes.
    a. It also not clear whether SES in charge of the IAU and FOI teams are required to undertake this training. In my view, they should be.
3. An annual refresher appears more appropriate than three-yearly refreshers.

4. I am satisfied with the trauma-informed principles Defence produced; however, these are only lightly reflected in departmental policies and procedures. I am not confident that they have been embedded across practice.
5. Some Defence SOPs reference some degree of trauma-informed practice or demonstrate some sensitivity towards difficult subjects. However, it is limited and generalised, and would benefit in all cases from further specificity, including in relation to available supports for both staff and applicants.
6. Defence has created some trauma-informed email templates to assist when providing sensitive or potentially traumatic information to applicants. However, they do not appear to cover all circumstances and are ambiguous. Defence would benefit from a broader range of templates; for example, for circumstances where the information may contain mentions or pictures of deceased First Nations persons. They should also include contact details for recipients to seek support.
7. Defence has implemented two warm handover processes:
    a. Clients calling either 1800 Defence or 1800 Veteran can be transferred to the other helpline by staff, without needing to hang up and redial the correct helpline.
    b. Information access requests made to one department, but requiring some action by the other, can be transferred internally without needing to be returned to the applicant. However, I have not seen evidence demonstrating this is happening in practice.
8. Public submissions reflected mixed views on whether interactions with the departments are trauma-informed.
9. One submission indicated they experienced obstructions from business areas, suggesting a need for trauma-informed training to be expanded beyond the IAU and FOI teams.
10. Although Defence reports ongoing quality- assurance activities, I do not have evidence as to how these are being assessed, or whether applicant feedback is considered.
11. As the IAU is not operating as a true single point of contact, and trauma-informed practices are not embedded in the department, I consider that Defence has partially implemented this recommendation.
12. I lack sufficient evidence to assess whether the changes made have been effective in improving the experience for applicants.

Defence response

Defence acknowledges the DVSC's assessment and welcomes the opportunity to provide additional context regarding implementation of Recommendation 11. Defence remains committed to embedding trauma-informed practices across information access functions and agrees that continuous improvement in this area is both necessary and appropriate.

Since establishment of the Information Access Unit (IAU) in 2023, the way current and former ADF members, families and representatives access personal information held by Defence has fundamentally changed. The IAU provides a dedicated entry point for personal information requests and is designed to support applicants through a streamlined, consistent and trauma- informed process. While Defence's Freedom of Information (FOI) functions remain separate from the IAU, this reflects the distinct legislative frameworks, decision-making requirements and operating models that govern the two pathways. Rather than pursuing a fully integrated structure, Defence has focused on delivering a consolidated customer experience. This approach includes promoting administrative release as the preferred access mechanism where appropriate, establishing processes for seamless transfer of requests between administrative and FOI pathways, and reducing the need for applicants to navigate Defence's internal arrangements or submit multiple requests. These measures align with the intent of the recommendation by simplifying access to information and minimising administrative burden on applicants.

Significant emphasis has also been placed on building trauma-informed capability across personnel involved in information access and support functions. Trauma-Informed Practices training is mandatory for IAU, FOI and 1800 Defence staff and is included in induction requirements for relevant personnel.

Additional direction has extended training requirements into all areas of the Military Personnel Organisation and other workforces routinely engaged in managing sensitive information. Since the release of the training package in April 2024, more than 12,700 Defence personnel have completed the training (see Table 2), demonstrating substantial uptake across the organisation. Defence shares the view expressed by the DVSC and supports the expansion of trauma-informed learning for SES officers responsible for these functions, and recognises the value of more frequent refresher training to reinforce capability and promote consistent application of trauma-informed principles.

Financial Year	Training Completions
2023-24	3,535
2024-25	4,012
2025-26	5,194
Total	**12,741**

Beyond training, Defence considers that trauma-informed principles are increasingly being embedded into policy, guidance and organisational practice. The principles of safety, trust, choice, collaboration, empowerment and cultural sensitivity have been incorporated into complaint management processes, leadership education, mental health and wellbeing initiatives, transition supports and broader reform activities. The Complaints and Alternative Resolution Manual has been updated to incorporate trauma-informed principles, while Defence strategies addressing mental health, wellbeing, family violence and sexual violence also reflect these approaches. Defence shares the view expressed by the DVSC that opportunities remain to strengthen the explicit incorporation of trauma-informed practices within operational procedures, templates and guidance materials, particularly within information access functions. Defence is therefore continuing to review SOPs, communication templates and supporting materials to improve consistency, provide clearer guidance for staff, and better connect applicants with available support services when sensitive information is being released.

Defence shares the view of the DVSC that trauma-informed practice is not a static capability and requires ongoing refinement informed by emerging experience, stakeholder feedback and organisational learning. While processes such as warm handovers between Defence and DVA services, and transfers between information-access pathways, have been established, there is currently limited data demonstrating the volume or effectiveness of these activities. Similarly, the importance of developing stronger evidence regarding applicant experience and outcomes is recognised. Feedback from the DVSC, public submissions and future evaluation activities will assist Defence in identifying areas for further improvement and in strengthening assurance mechanisms around the effectiveness of trauma-informed practices.

Overall, substantial progress has been made towards implementing Recommendation 11 through the establishment of the IAU, the expansion of trauma-informed training, the incorporation of trauma-informed principles across policy and practice, and the implementation of processes intended to simplify and support applicant engagement. At the same time, Defence acknowledges the opportunities identified by the DVSC to further embed these practices through enhanced SOPs,

broader guidance materials, improved performance measurement, strengthened evidence of outcomes, and continued expansion of trauma-informed capability across the organisation. Defence remains committed to these improvements and to ensuring that people seeking information from Defence are supported through a consistent, respectful and trauma-informed experience.

Based on the additional information and evidence in this response, Defence seeks your consideration of a further review of your findings.

Defence and Veterans' Service Commission annotations

The DVSC now considers this recommendation 'implemented'.

We added this text in relation to the operation of the IAU: 'Defence advised this is mitigated by strong internal controls allowing for seamless transfers of requests between the two pathways. They also contend it is appropriate based on the different legislative and policy frameworks surrounding the two different forms of information release. I accept that a seamless transfer process is a mitigation against disruption for applicants, but I do not have evidence as to how this is achieved. To be effective, such a process should involve:

- prompt identification of matters requiring transfer
- proactive communication with the applicant, and
- thorough handover processes to ensure work is not unnecessarily duplicated or delayed.

Positive steps have been taken. Although the IAUs are not operating as true single points of contact within either department, both DVA and Defence have implemented approaches that seek to balance the lack of continuity with other advantages such as faster self-service.

We clarified in the report that Defence requires IAU, FOI, and 1800 Defence teams to complete trauma-informed training.

We added the text: 'Defence also confirmed that all Military Personnel Organisation staff had completed the training as of September 2024. I acknowledge this is no small undertaking and commend Defence for this effort.'

We added the text: 'Defence also directed all Military Personnel Organisation staff and other workforces routinely engaged in managing sensitive information to complete the training by September 2024. I acknowledge this is no small undertaking and commend Defence for this effort..'

We added the text: 'Pleasingly, Defence provided a preliminary indication of their support to expand training to these SES.'

We amended the Conclusion to include: 'Defence and DVA have taken steps to implement this recommendation including establishing IAUs and a single point of contact approach; training staff in trauma-informed practices; reflecting trauma-informed practices in some policies, procedures and templates; and creating warm transfer processes between the two departments. While I think more can be done to further embed trauma-informed practices into both departments, including a clear schedule for training and refreshers and a review of policies and procedures to further incorporate trauma-informed practices, I assess that Defence and DVA implemented this recommendation.'

We added the text: 'In order to assess effectiveness, further evidence of the public experience of administrative release requests in DVA escalated from a business area to the IAU, and information requests in Defence transferred between the IAU and the FOI team or vice versa would be needed to determine whether the decision to take these split approaches over a single point of contact has been appropriate.'

Recommendation 12: Increase opportunities to provide up-to-date consent for information access

The intent of this recommendation is that serving and ex-serving members should be provided with additional, easy, and regular ways by which they can provide or change their consent to share information with others.

Government Status	Commissioner's Assessment	Did implementation improve outcomes for Defence members and veterans?
Implemented	Not Implemented – subsequently updated to Partially Implemented	No – subsequently updated to Insufficient evidence

Defence and Veterans' Service Commissioner's recommendation 12 findings

1. Defence had initially planned to undertake a review of current mechanisms for providing and amending consent. However, this did not occur.
    a. Defence has indicated this is now underway.
2. Defence indicated they created an additional opportunity for consent to be updated during transition by 'encouraging' Transition Coaches to address consent in transition discussions. However, this does not appear to be an additional opportunity for members to amend consent, but an opportunity to remind members about existing consent mechanisms.
3. Defence did not implement any additional opportunities for members to update consent. This is particularly concerning in light of the additional concerns raised by the Final Report of the Royal Commission into Defence and Veteran Suicide in Chapters 16 and 18 around consent mechanisms and the *Privacy Act*.
4. Defence documented a post-closure action to implement an annual reminder to provide, update or withdraw consent for information access. I have not been provided with evidence of whether this has occurred.
5. Defence did not take further action on three of the four recommendations in the Closure Report, namely:
    a. Prioritising the review of current mechanisms, and identifying further opportunities for consent provision or update
    b. Investigating the feasibility of an online system to streamline providing, amending or withdrawing consent, which Defence concluded was 'out of scope', and
    c. Finalising co-design analysis with target audience to measure the effectiveness of products produced.
6. Defence has not provided data on the effectiveness of their actions.
7. Submissions reflect mixed views on privacy and information disclosure.
8. Defence has not implemented this recommendation, and sufficient action has not been taken in a timely way.
9. At this point in time I assess the implementation of this recommendation as not effective.

Defence repsonse

Defence acknowledges the DVSC's assessment that Recommendation 12 has not yet been implemented and recognises the concerns raised regarding the pace of progress, the absence of demonstrable outcomes and the need for additional opportunities for serving and ex-serving members to provide, review and amend consent arrangements. While implementation has not progressed in the manner originally envisaged under the Interim Report, significant work has been undertaken to better

understand consent arrangements across the Defence ecosystem and that this work has evolved into, and is now being delivered through, the broader reforms associated with Recommendation 68 of the Royal Commission into Defence and Veteran Suicide (RCDVS) Final Report.

Since the release of the Interim Report, Defence and DVA have undertaken a range of activities to examine consent processes and identify opportunities for improvement. This included a series of joint working groups focused on consent arrangements, benchmarking existing practices and exploring future options. In 2022, Defence reviewed its webform processes and identified opportunities to improve consent awareness. Further work undertaken through the Joint Transition Authority mapped the transition journey and identified several systemic challenges, including the complexity of consent arrangements across agencies, limited visibility of consent status, insufficient guidance regarding withdrawal of consent, inconsistent inclusion of family-related consent provisions and the absence of a centralised mechanism to identify the consent provided by an individual at any given point in time. These findings informed subsequent reform activities and highlighted the need for a more coordinated and comprehensive approach.

Building on this work, the Defence Privacy Office commenced mapping health and wellbeing-related consent forms in late 2025 and is undertaking broader reviews of consent mechanisms and processes as part of Defence's implementation of Recommendation 68 of the RCDVS Final Report. This work is examining how consent arrangements operate across Defence, identifying opportunities to simplify processes, improve member understanding and strengthen the balance between privacy protections and appropriate information sharing. Reforms are being supported through policy updates, revisions to forms and guidance materials, member education activities and targeted communication products designed to increase awareness of how consent can be provided, amended or withdrawn. A broader review of Defence consent forms is scheduled for 2027.

Defence notes the DVSC's observation that some initiatives implemented to date may constitute opportunities to remind members about consent mechanisms rather than entirely new consent mechanisms. Defence nevertheless considers that increasing awareness of existing pathways is an important element of achieving the recommendation's intent. Additional opportunities for members to consider and review their consent arrangements during key stages of their service journey have been introduced, particularly during transition from military service. Transition discussions now include information regarding consent processes, including how consent may be provided, updated or withdrawn both within Defence and across external organisations involved in the transition process. In addition, Defence-wide communications issued in 2024 encouraged personnel to review their existing consent arrangements and consider whether updates were required based on their personal circumstances. Annual Privacy Awareness Week activities and ongoing privacy education initiatives similarly reinforce awareness of consent and privacy obligations.

Defence also notes that members are able to provide, amend or withdraw consent at any time and that numerous existing consent mechanisms already operate throughout a member's career at any time. Opportunities for consent arise across personnel administration, welfare management, performance and career management, security processes, health services, transition support, welfare reviews, employment category determinations and research activities. Members are also able to seek advice regarding consent-related matters through the Defence Privacy Office. While these arrangements were not originally presented as part of Defence's response to the recommendation, they demonstrate that consent can be reviewed and amended at multiple points throughout the Defence lifecycle rather than being restricted to a small number of formal events.

Defence shares the view expressed by the DVSC's that some post-closure actions were not fully completed, including the proposed annual consent reminder, the broader review of consent mechanisms, exploration of a technology-enabled consent management solution and evaluation of co-design outcomes. Defence acknowledges these gaps and notes that competing implementation

priorities following release of the RCDVS Final Report, particularly the substantial body of work associated with Recommendation 68, resulted in resources being redirected towards activities with broader organisational impact. Notwithstanding this, Defence intends to address these matters through ongoing implementation activities and future reviews of consent processes. Defence has also previously acknowledged that development of a dedicated ICT solution to manage consent arrangements has not progressed due to funding and workforce constraints.

Defence further acknowledges that it has not yet provided sufficient data to demonstrate the effectiveness of actions undertaken to date. While considerable effort has been directed towards understanding existing consent arrangements, educating members and reviewing policies and processes, stronger evaluation mechanisms and outcome measures are required. The Defence Privacy Office is reviewing reporting arrangements, analysing trends and complaints data, and using this information to inform governance improvements, guidance material development and future communications. Data- driven approaches to strengthen assurance, performance monitoring and evidence of effectiveness will continue to be explored.

Defence welcomes the opportunity to consider feedback received through the DVSC's public submission process, noting that community views regarding privacy, consent and information disclosure are diverse and sometimes competing. Such feedback will assist Defence in refining future reforms and ensuring consent arrangements appropriately balance individual privacy, transparency, family engagement and member wellbeing.

Overall, Defence recognises that Recommendation 12 has not yet achieved its intended outcome and acknowledges the DVSC's concerns regarding implementation and effectiveness. However, Defence considers that substantial foundational work has been undertaken to better understand consent arrangements and to support broader reform through Recommendation 68 of the RCDVS Final Report. While implementation has occurred through a different pathway than originally anticipated, Defence remains committed to improving opportunities for members to provide, review and amend consent, strengthening education and awareness, modernising supporting processes, and developing a stronger evidence base to demonstrate effectiveness. The work currently underway through Recommendation 68 provides the most effective mechanism to achieve the underlying intent of this recommendation and deliver enduring improvements in consent management across the Defence enterprise.

Based on the additional information and evidence in this response, Defence seeks your consideration of a further review of your findings.

Defence and Veterans' Service Commission annotations

The DVSC made the following amendments to the critical findings on the basis of this additional information:

The DVSC now considers this recommendation 'partially implemented'.

The DVSC corrected references to Defence's Closure Report, which should have referred to Defence's Benefits Review.

We added the text: 'Defence subsequently reported the following review activities have been undertaken or are underway:

- A review of webform processes in 2022 which identified options for inclusion of 'consent' checkboxes.
- The Joint Transition Authority mapped how consent is reflected in the transition journey, identifying there is a lack of clarity and communications around withdrawal of consent and

consent to share with family, and a lack of a central point to identify what consent has been given acro multiple forms.

- The Defence Privacy Office commenced mapping health and wellbeing-related consent for in late 2025.

A broader review of Defence consent forms is scheduled for 2027.

It appears work is ongoing to map current mechanisms for providing and amending consent and identify opportunities for improvement. This work being done as part of Defence's implementation of Recommendation 68 of the Royal Commission's Final Report, which deals with the balance between upholding members' confidentiality and appropriately disclosing when they are in distress. I acknowledge the overlap between these recommendations and accept that some measures may be more appropriately incorporated into the implementation of Recommendation 68.

However, the Defence review of consent mechanisms has been significantly delayed, particularly given an acknowledged finding of the co-design workshops conducted in 2022 was that 'Consent as a process needs to be formalised and structured. It is currently disorderly across the forces.' It is also not clear that work undertaken for Recommendation 68 will result in any new formalised consent opportunities.'

We added the text: 'I consider education campaigns valuable in that they remind members and veterans of the importance of updating consent. However, a point-in-time campaign is necessarily limited and will not continue to benefit members and veterans in the future. For it to be truly effective, ongoing education is required.'

We added the text: 'However, I acknowledge that a member or veteran being informed or reminded of the possibility to update consent by either department may function as a prompt for them to do so, which goes some way towards the intent of the recommendation.

Defence also noted that 'members are able to provide, amend or withdraw consent at any time and that numerous existing consent mechanisms already operate throughout a member's career at any time … rather than being restricted to a small number of formal events.' '

We added the text: 'On the basis that some steps have been taken to provide members and veterans a greater understanding of consent mechanisms and encourage them to update their consent, as well as review current consent mechanisms and identify further opportunities for consent provision or update, I assess that Defence and DVA partially implemented this recommendation with timeliness concerns.

I will continue to review Defence's implementation of this recommendation as their work on recommendation 68 progresses.'

We added the text regarding effectiveness measures: 'such as numbers of members or veterans with up-to- date consent arrangements and numbers of members or veterans proactively updating them.'

Recommendation 13: Co-design education on information access mechanisms

The intent of this recommendation is to ensure the departments work with the Defence and veteran community to develop accessible guidance about ways to access information from Defence and DVA.

Government Status	Commissioner's Assessment	Did implementation improve outcomes for Defence members and veterans?
Implemented	Partially Implemented	Insufficient evidence

Defence and Veterans' Service Commissioner's recommendation 13 findings

1. Defence's Information Release Policy adds an element of public accountability to their approach to information release. However, the policy has not been updated since its release, despite including 'expected outcomes'. This potentially undermines this accountability and public confidence in any ongoing review of these principles.
2. Defence's website is clear and informative. It is easy to navigate from the home page to the pages about information release.
    a. The website could benefit from making the hard-copy downloadable forms distinct from the online application process.
3. Defence's guidelines are generally clear and useful. However, the Policy documents designed for staff use are generally ill-suited for use by the public.
4. Defence's ServiceConnect received a relatively small number of complaints compared to usage. These complaints primarily reflected access issues and process delays.
5. Public submissions reflected:
    a. Issues for people who have changed their name
    b. Difficulties accessing information about deceased members without probate, even where probate is not legally necessary.
6. Defence has not conducted post-closure reviews on the effectiveness of the material, beyond the delayed first review reported upon in April 2024.
7. For the reasons explained in relation to recommendation 10, although consultation is a positive step, without true co-design of the final products I do not consider the full intent of the recommendation met.
8. I assess Defence has partially implemented this recommendation.

Defence repsonse

Defence acknowledges the DVSC's assessment that Recommendation 13 has been partially implemented and welcomes the observations provided regarding the accessibility, effectiveness and development of information access education materials. Defence remains committed to ensuring serving and former members, their families and representatives can readily understand and access information held by Defence through clear, accessible and transparent guidance materials.

Since the recommendation was agreed, Defence has introduced a range of information access resources, including the Information Release Policy, website content, ServiceConnect functionality, information brochures and supporting guidance materials intended to improve understanding of information access pathways and the processes used by Defence when responding to requests for information. Collectively, these initiatives have sought to increase transparency, improve awareness of available access mechanisms and support a more consistent customer experience.

The DVSC's observation regarding the Information Release Policy and its expected outcomes is noted. The Policy was released in May 2024 and is maintained in accordance with Defence's Administrative Policy Arrangements, which provide for review within five years of issue, or earlier if required. While the Policy has not yet undergone review, Defence considers this reflects the relative recency of its release rather than an absence of commitment to accountability or continuous improvement. Defence remains open to reviewing the Policy earlier should operational experience or stakeholder feedback indicate that changes are warranted.

The DVSC's recognition that Defence's website is clear, informative and easy to navigate is welcomed. Defence shares the view of the DVSC that there may be opportunities to further distinguish between online submission processes and downloadable forms to enhance user understanding. The Information Access Unit (IAU) continues to monitor feedback and identify opportunities to improve accessibility, service delivery and awareness of available access pathways. This work is supported through ongoing engagement with ex-service organisations and periodic updates to customer-facing communication products, including the Information Access Unit brochure and related guidance materials.

Defence also shares the view expressed by the DVSC that some policy documents published online may be better suited to internal audiences than members of the public. The Information Release Policy was developed primarily as an internal policy document to guide Defence personnel and promote consistency in the management of information access requests. Its publication was intended to enhance transparency and provide visibility of the principles governing Defence's approach to information release rather than serve as a standalone public education product. Defence recognises, however, that additional explanatory material or a plain-language summary could further assist members of the public in understanding the intent of the policy and how it applies to their information access requests. Defence will consider opportunities to improve accessibility and public understanding while maintaining transparency regarding Defence's information release framework.

The DVSC's findings regarding ServiceConnect and welcomes the acknowledgement that complaint volumes remain relatively low compared with overall usage is noted. Defence works closely with the ServiceConnect team to support ongoing enhancements informed by both internal and external feedback. Feedback relating to accessibility issues, user experience and process delays is considered as part of continuous improvement activities to ensure the platform remains responsive to customer needs.

Defence further acknowledges the issues identified through public submissions, including challenges experienced by individuals who have changed their name and difficulties encountered by some family members seeking access to information relating to deceased members. Defence welcomes the DVSC sharing relevant feedback from public submissions as part of their draft report. This information will assist Defence in identifying opportunities to review existing policy settings, guidance materials and administrative processes to ensure information access arrangements remain appropriately balanced between accessibility, privacy obligations and legislative requirements.

Defence accepts the DVSC's observation that a formal post-implementation review of the educational products has not been undertaken beyond the initial review activities previously reported. While a continuous improvement approach through ongoing operational feedback, stakeholder engagement and monitoring of service delivery issues, has been adopted, Defence acknowledges that a more structured review process would provide greater assurance regarding the effectiveness of educational materials in improving public understanding of information access mechanisms. Defence will consider opportunities to strengthen evaluation and assurance activities as part of future reviews.

The DVSC's views regarding co-design are acknowledged. Consistent with Defence's response to Recommendation 10, Defence recognises the distinction between consultation and full co-design involving stakeholder participation in the development and finalisation of products. While extensive

consultation was undertaken during the development of information access education materials, Defence acknowledges that the process did not include a final co-design validation stage. Defence accepts that future reviews and updates would benefit from deeper involvement of serving and former members, families, advocates and representative groups to ensure materials remain user-focused and reflect the needs of those accessing information from Defence.

Overall, substantial progress has been made towards achieving the intent of Recommendation 13 through the publication of information access guidance, enhanced website resources, and improved transparency regarding information release processes and the establishment of customer-focused access channels such as the Information Access Unit and ServiceConnect. Defence acknowledges, however, that opportunities remain to strengthen public-facing information, improve accessibility of policy materials, enhance evaluation of outcomes and incorporate broader co-design principles into future product reviews where possible. Defence remains committed to continuous improvement in these areas and welcomes further engagement with stakeholders and the DVSC to ensure educational materials continue to support a clear, accessible and user-centred information access experience.

Based on the additional information and evidence in this response, Defence seeks your consideration of a further review of your findings.

Defence and Veterans' Service Commission annotations

The DVSC did not make any amendments to Recommendation 13 in relation to Defence.

Appendix B

Department of Veterans' Affairs responses

The Department of Veterans' Affairs was given the opportunity to review and respond to critical findings made by the Commissioner through the Access to Information Inquiry.

Recommendation 9: Improve administrative release of information

The intent of this recommendation is to provide clear guidance to applicants and proactively prioritise administrative release as a preferred pathway for accessing information from Defence and DVA.

Government Status	Commissioner's Assessment	Did implementation improve outcomes for Defence members and veterans?
Implemented	Implemented	On track – This means there are indications the improvements are having a positive impact but more information is needed to form an evidence-based view of effectiveness.

Recommendation 9 – Finding 1

The number of matters transitioned from FOI requests to admin release indicates that DVA's Information Access Unit has proactively worked with applicants to prioritise admin release

a) Average processing times and the number of non-completed requests in DVA have risen across admin release, FOI, and Privacy Act requests. In the case of FOI and admin release, the increase is about 20 days.

Department of Veterans' Affairs response to Finding 1

The Department notes that the full success of the administrative access scheme is not fully illustrated by only counting matters transferred from FOI. Since recording of admin release commenced, this work type has gradually overtaken the FOI in terms of numbers of requests received. This is illustrative of the fact that veterans have engaged directly with that option or have benefitted from previous engagement and choosing not to engage in the FOI process. It further demonstrates the information provided on our website and engagement provided through our Information Access Unit (IAU) is resonating with veterans and families of veterans.

The Department notes that Commonwealth FOI Commissioner has publicly acknowledged this success. Using the Department's admin access success to advertise the benefits for agency and the public, while also minimising an agency's FOI workload.

With regards to the average processing times, the Department notes, that over the last 5 reporting years the numbers of admin releases have substantially increased. In 2021/22, 818 matters were released at an average handling time of 32 calendar days. In 2025/26, this number increased to 2,635 at an average of 47 days.

Over that timeframe, the increase in work has led to processing delays, peaking at an average of 70 days in 2023/24. The DVSC observation relates to 2024/25 data, which was an improvement on the previous year. The current year illustrates further improved performance.

The Information Access Unit (IAU) is currently staffed to 35 FTE and is managing increasing current caseloads and overdue matters across FOI, Privacy and Administrative Access pathways. The IAU processed 3,419 FOI, Privacy and AA requests over the 2025/26 financial year. This represents an overall decrease of 22% of information access requests compared with the 2024/25 financial year. DVA has received an increase of 26% in FOI requests in the 2025/26 financial year compared to the 2024/25 period.

DVA is actively mitigating these risks through case triage, prioritisation of aged and complex matters, targeted workload allocation, escalation of high-risk or sensitive requests, and ongoing monitoring of throughput, backlog movement and statutory compliance impacts. there is also active and positive engagement with the Information Commissioner to increase transparency and address any systemic issues constructively. These controls support continuity of service to applicants while informing workforce planning and resourcing considerations for sustainable delivery.

DVA would benefit from being provided the statistic information referenced, as we are not able to comment on unseen or verified statistics the basis on which those figures have been calculated; however, DVA has provided overdue figures under supporting evidence to assist the Commissioner's assessment. The Department continues to work closely with the Office of the Australian Information Commissioner (OAIC) to support information release outcomes for applicants.

Defence and Veterans' Service Commission's annotation for Finding 1

The DVSC has not amended the report based on the additional statistics provided, as these additional metrics had already been considered. DVA had not seen the full report at the time they provided this response, as they were provided only with critical findings under s 23 of the *Defence and Veterans' Service Commissioner Act 2026*.

The DVSC has not included the additional statistics for 2025-26 financial year in the report, as there are no equivalent statistics for other measures considered, or for Defence.

We added the text: 'DVA advised that staff are trained to conduct FOI triage to identify cases that would be more appropriate for administrative release and contact applicants to seek permission to divert those cases. It is not clear to what extent Defence staff consult applicants during the same process.'

All statistics in the report were obtained from Defence and DVA directly, unless otherwise specified.

Recommendation 9 – Finding 2

The majority of public submissions highlighted processing timeframes as a concern. DVSC greatest concern going forward is whether the implementation of IAU is sustainable and the unit adequately resourced.

Department of Veterans' Affairs response to Finding 2

To assist DVA in its response to these preliminary findings it would be beneficial to ensure a comprehensive and meaningful response is provided if the deidentified feedback received during the public submission phase was shared with regards to this point. This additional evidence the DVSC is relying on would enhance our understanding of the issues and recommendations laid out by the DVSC.

The Information Access Unit (IAU) is the Department's front line service provider responsible for assisting DVA clients and the public with access to any personal or corporate information held by DVA.

The Department has received over 4,371 information access requests through the IAU during the 2025-26 Financial Year. This includes other statutory responses, as well as maintaining a significant volume of Freedom of Information and other access actions (including for personal information through administrative access/MRCA and DRCA, and the Privacy Act) during this period.

The Department continues to strive to respond to the majority of FOI requests within statutory timeframes and address processing delays as a matter of priority. The IAU has implemented several improvements to support this, including:

- Improvement to IT equipment and systems including a LEX platform upgrade
- Streamlined webpages to provide clarity to clients
- Development of web-based forms as an additional request mechanism to speed up registration process
- Established Standard Operating Procedures (SOPs) to ensure consistency in process across teams
- Updated disclosure log practices and created repository on DVA website to allow direct download of documents
- Stood up a dedicated Business Operations space to deliver ongoing learning and development, reporting and coordination functions.

The IAU is continuing to implement a range of improvements as recommended by OAIC Complaint Outcomes, Royal Commission Recommendations, engagement with FOI processing areas across the Commonwealth and the 2023 independent review, to uplift capability and support timely processing of information access requests.

These include:

- Review IAU structure to embed hierarchy and build surge capability, including standing up a tiger team in February 2026 to support ongoing processing of deemed FOI requests and reduce the backlog.
- Review the department's guidelines and training resources, including delivery mechanisms to ensure these reflect best practice and can support processing staff and business areas appropriately.
- Prioritise staff learning and development, to enhance process understanding and maturity.
- Identify and work with client facing Business areas to increase the release of information at the point of primary contact. Minimising the necessity for formal access actions as much as possible.

DVA has identified a clear operational need to strengthen the IAU's resourcing profile to manage overdue requests across all information access pathways while maintaining timely action on new matters. The Department is currently considering labour hire options to provide targeted surge capacity to increase the IAU's processing workforce.

This uplift would support backlog reduction, improve continuity of service for applicants, and provide additional capacity to manage statutory; reputational and applicant experience risks associated with sustained demand across FOI, Privacy and Administrative Access pathways.

Defence and Veterans' Service Commission's annotation for Finding 2

We added the text: 'DVA acknowledged the need to strengthen the IAU's resourcing and noted they are considering options to provide targeted surge capacity. This is a positive step. However, it remains to be seen whether targeted surge capacity is sufficient to adequately manage the number of requests in the long-term.'

Recommendation 9 – Finding 3

Submissions raised concerns around the accessibility of documents, particularly regarding confusion between online forms and downloadable PDF forms.

Department of Veterans' Affairs response to Finding 3

To assist DVA in its response to these preliminary findings it would be beneficial if the deidentified feedback received during the public submission phase was shared with regards to this point. This additional evidence the DVSC is relying on would enhance our understanding of the issues and recommendations laid out by the DVSC.

The IAU information access webforms are designed to improve the applicant experience and support more efficient registration by guiding applicants to provide the information required to assess and progress their request at the point of lodgement. This includes prompting applicants to identify the relevant document type, preferred access pathway and any third-party information considerations. Capturing this information upfront not only assists the Department to triage, register and allocate requests more efficiently, supports timely processing, and reduces the need for follow-up contact with applicants it assists applicants are providing requests compliant with the Freedom of Information Act 1982 (FOI Act). A downloadable paper information access form remains available for applicants who are unable to, or prefer not to, use the online pathway.

As provided in our previous submission (refer previous evidence provided by DVA in response to Question 5, DVSC-RFI-01), DVA continues to deliver educational communications to promote MyService (DVA's online platform for clients) and its functions, encouraging self-service, and potentially reducing the need for clients to contact DVA to access information.

DVA is committed to a program of continuous improvement while ensuring statutory requirements are clearly explained and managed in accordance with the FOI Act and guidance material provided by the OAIC.

Defence and Veterans' Service Commission's annotation for Finding 3

We added the text: 'These users may benefit from clearer signposting of which form to use when applying online versus which form to print and mail to the Department.'

Recommendation 9 – Finding 4

DVA complaint data - 3 complaints between June 2022 and June 2025 is implausibly low, given the volume of requests and feedback about processing timeframes.

Department of Veterans' Affairs response to Finding 4

The data identifying three complaints was responsive to the Commission's original request for feedback about FOI and Administrative Access processes and reflects the obtainable records where feedback was provided in relation to those processes; it was not intended to represent a comprehensive record of all complaints received across all FOI and Administrative Access processing pathways within DVA.

Noting the evidence provided at the time, together with the supplementary evidence provided in response to the DVSC's preliminary findings, DVA asks the DVSC to reconsider this finding having regard to the additional information and clarification provided.

The complaints identified and provided in the Department's February submission were provided by the Client Feedback Management System (CFMS) team and were in response to the Commission's request to provide complaints made about the process for obtaining information in the financial years ending June 2022, June 2023, June 2024 and June 2025 (refer previous evidence provided by DVA in response to Question 11, DVSC-RFI-01).

DVA provided deidentified copies of all feedback received between the requested period regarding the process for obtaining information. This feedback was identified following searches conducted on DVA's CFMS and the complaints were identified within scope of the timeframe and request. DVA disagrees that this figure is implausible due to our records indicating that even when conducting a broader search than the Commission's request, a total of 8 complaints were identified as having been made which were relevant to the IAU during the requested period.

Furthermore, DVA submits that applicant complaints about information provisions may be subjective and should be considered through the lens of the method of access provided. This is because, under information release legislative frameworks, there are specific considerations to be taken into account by decision makers when providing access to information.

Complaints are received and managed through the CFMS Team, which coordinates departmental responses in accordance with established feedback and complaints handling processes. DVA works closely with OAIC and complies with complaint notices to support continuous improvement in information access processes and timeliness.

Defence and Veterans' Service Commission's annotation for Finding 4

We amended the text to say: 'DVA reported only receiving 8 complaints relating to the IAU between 2022 and 2025. This was low when compared to the volume of requests and the feedback about processing timeframes and compared to the 20 complaints apparently received about the IAU in the 2025-26 financial year. By comparison, Defence recorded 16 complaints in 2024 and 31 in 2025.'

Recommendation 9 – Finding 5

Insufficient evidence from DVA to determine if serving and ex-serving members and their families find the documents clear and useful in practice.

Department of Veterans' Affairs response to Finding 5

The Department does not currently maintain a mechanism to specifically identify or measure engagement by serving and ex-serving Australian Defence Force (ADF) members within the information access process.

Reporting to such detail is not required under the relevant legislative frameworks or the Administrative Access pathway. DVA will continue to consider whether any future enhancements to reporting or feedback mechanisms.

However, the Commission did not request this information in its initial February request for information for DVA to respond to. Noting the evidence provided at the time, together with the supplementary evidence provided in response to the DVSC's preliminary findings, DVA asks the DVSC to reconsider this finding having regard to the additional information and clarification provided with regards to our current reporting statutory requirements.

Defence and Veterans' Service Commission's annotation for Finding 5

No amendments.

Recommendation 9 – Finding 6

DVA has no other built-in methods to measure the impact of their actions in relation to prioritising and improving the administrative release process, nor have they conducted subsequent reviews of their actions. This means DVA is not measuring whether they have truly improved outcomes for applicants.

Department of Veterans' Affairs response to Finding 6

The processing data for FOI and AA is illustrative of improved outcomes, despite the inference of this statement. The total numbers of each work type and the respective handling time demonstrate that the veteran community is largely engaging in the AA process and receiving their information quicker.

As iterated above at 9.5, complaints are received and managed through the CFMS Team, which coordinates departmental responses in accordance with established feedback and complaints handling processes. Where complaints relate to information access processes, they are directed to the IAU for response and further action to address the applicant's concerns.

Noting the evidence provided at the time, together with the supplementary evidence provided in response to the DVSC's preliminary findings, DVA asks the DVSC to reconsider this finding having regard to the additional information and clarification provided.

Defence and Veterans' Service Commission's annotation for Finding 6

Finding retracted.

Recommendation 9 – Finding 7

DVA is on track to demonstrating effectiveness, but more is needed to form an evidence-based view of whether the implementation of this recommendation has been effective.

Department of Veterans' Affairs response to Finding 7

Disagree.

As set out in the evidence previously provided (refer DVA responses to Questions 5 to 11, DVSC-RFI-01) and in the responses to 9.1, 9.2 and 9.5 above, DVA suggests that the evidence provided indicates that DVA has effectively implemented the recommendation, both in terms of publishing guidelines which better support applicants to access information and in prioritising the use of administrative release. As set out in our previous evidence (refer DVA response to Question 6, DVSC-RFI-01), between 2021/2 and 2024/25, requests for information dealt with through administrative release more than tripled, while requests dealt with through FOI more than halved over the same period.

As set out at 9.5, the complaint information previously provided was drawn from matters identified by the Client Feedback Management System team in response to the Commission's request for complaints about the process for obtaining information across the financial years ending June 2022 to June 2025. DVA has since identified 20 complaints relating to information provision by the IAU in the 2025-26 financial year.

DVA submits that applicant complaints about information provisions may be subjective and should be considered through the lens of the method of access provided. This is because, under information release legislative frameworks, there are specific considerations to be taken into account by decision makers when providing access to information.

While this demonstrates that complaints are being recorded and managed through established departmental processes, DVA notes that complaint volumes alone are not a complete proxy for applicant experience, implementation effectiveness or impact. To respond fully, DVA would welcome further definition from the DVSC on the specific evidence it is seeking, including whether the assessment is intended to focus on implementation actions taken, service performance measures, applicant experience, or broader outcome and impact indicators. Clarifying this distinction would assist DVA to provide targeted supporting evidence and avoid conflating implementation activity with assessment of effectiveness. DVA asks the DVSC to reconsider this finding having regard to the additional information and clarification requested and provided.

Defence and Veterans' Service Commission's annotation for Finding 7

We amended the text to say: 'In particular, additional user feedback on the process would be useful.'

Recommendation 10: Co-design information to increase awareness of redactions for access requests

The intent of this recommendation is to ensure the departments work together with the Defence and veteran community to develop accessible guidance in relation to redactions and how and why they are applied.

Government Status	Commissioner's Assessment	Did implementation improve outcomes for veterans and members?
Implemented	Partially Implemented	Insufficient evidence

Recommendation 10 – Finding 1

Redaction Guidelines - whilst the guidelines appear well-aligned between the Department of Defence and DVA and are clear and user-friendly for DVA staff, some concepts could benefit from further clarification (e.g. concept of 'more than minor redactions'.

Department of Veterans' Affairs response to Finding 1

DVA asks the DVSC to reconsider this finding (parts a, b and c) having regard to the additional information and clarification provided, noting the extensive consultation process that was undertaken on the guidelines and the evidence of ensuring consistency and usability at the heart of the review.

DVA remains committed to continuous improvement and to maintaining alignment with the Department of Defence to ensure the Redaction Guidelines remain consistent across both departments. At present, DVA considers the Guidelines provide an appropriate high-level framework for staff and applicants. DVA notes that any review of the Guidelines would need to be undertaken in step with Defence to preserve consistency of approach and terminology across information access pathways.

DVA considers that the phrase 'more than minor redactions' is necessarily contextual and is assessed on a case- by-case basis, having regard to the nature, volume and sensitivity of the information proposed for release, the likely impact on the applicant's understanding of the material, and the applicable legislative or administrative release pathway. Where a matter involves more substantive or complex redactions, decision makers mitigate potential confusion by providing tailored explanations in decision letters, statements of reasons or applicant communications, including the basis for the

redaction and any relevant review or support options. This approach is supported by the OAIC and outlined in their published guidelines.

Defence and Veterans' Service Commission's annotation for Finding 1

We added the text: 'Whilst I accept submissions from both departments that publishing internal guidelines promotes transparency about their processes, I am not convinced that a guideline produced for the purpose of assisting staff to administer the provisions of the FOI Act is a substitute for user-friendly information that is easily accessible, easily understood and aimed at assisting those engaging with the process for the first time. I do not suggest replacing these documents, but rather they should be supplemented by clear, user-friendly public guidance.'

Recommendation 10 – Finding 2

Redaction Guidelines - Since the guidelines are publicly available, further explanation of the public interest test might also be useful, as this may be a confusing concept for applicants trying to use the guidelines to better understand redactions.

Department of Veterans' Affairs response to Finding 2

The public interest test is a central safeguard in FOI decision-making, especially where conditionally exempt material is identified. DVA reinforces the OAIC guidance by ensuring decision makers consider whether access to conditionally exempt material would, on balance, be contrary to the public interest before any material is withheld. This approach supports lawful, consistent and transparent decision-making, and recognises that the public interest test does not apply to material that is exempt in full under the FOI Act.

DVA's public-facing material and applicant communications are intended to complement, rather than duplicate or depart from, the OAIC's statutory guidance. DVA will continue to reinforce the distinction between exempt material and conditionally exempt material, including through plain-English prompts and cross-references where these would assist applicants to understand when the public interest test is relevant and how it informs information access decisions.

Defence and Veterans' Service Commission's annotation for Finding 2

No amendments.

Recommendation 10 – Finding 3

Redaction Guidelines - the guidelines use technical and legislative language that may not be easily understood by a person unfamiliar with information release concepts. They do not appear clearly targeted at improving public understanding of redactions.

Department of Veterans' Affairs response to Finding 3

DVA developed the redaction guidelines with the Department of Defence through an external co-design process overseen by the Customer Experience Company (CEC). As previously provided (refer DVA responses to Questions 12-16, DVSC-RFI-01) the Redaction Guidelines were originally published on the DVA website in March 2023. In January 2024 an updated version of the Guidelines was published which included two new attachments: Attachment A: Most common examples of redactions applied to documents under the FOI Act; and Attachment B: Request scenarios: Retain, redact or

withhold. These documents were included to provide additional context to applicants and staff of when it is appropriate to redact information prior to release.

The guidelines have sought to apply plain-English principles where appropriate, while retaining technical and legislative terminology where it is necessary to accurately describe obligations, decision-making requirements and statutory concepts under the FOI Act, the Privacy Act 1988 and associated information access pathways. In these circumstances, simplifying terminology further may alter the intended legal meaning or reduce the precision required for consistent application by decision makers and applicants. This is demonstrated in pages 6- 8 of the DVA Redaction Guidelines.

For Administrative Access matters, redaction considerations are informed by the Australian Privacy Principles, including APP 12, and relevant OAIC guidance on access to personal information. DVA will continue to consider whether further plain-English examples, explanatory prompts or cross-references would assist applicants to understand how redactions are applied, without compromising the accuracy of the legislative or policy framework.

Defence and Veterans' Service Commission's annotation for Finding 3

No amendments.

Recommendation 10 – Finding 4

It is unclear why DVA determined that updating guidelines intended for their staff and publishing these was preferred over producing something specifically designed for the public, who do not have the same understanding of FOI and privacy principles. The Commissioner is not convinced that a guideline produced for the purpose of assisting staff to administer the provisions of the FOI Act is a valid substitute for user- friendly information that is easily accessible, easily understood and aimed at assisting those engaging with the process for the first time.

Department of Veterans' Affairs response to Finding 4

DVA identified two related issues: the absence of consolidated whole-of-department guidance for staff on the application of redactions across information release pathways, and the need to improve publicly available information for veterans, families and representatives about why redactions may be applied.

The Redaction Guidelines were developed to address both requirements by establishing a consistent departmental framework for decision makers and by supporting greater transparency for applicants through publication of the guidance online. Furthermore, applicants are able to access additional information on access methods via the OAIC website and the Department of Defence's published information access guidance.

DVA asks the DVSC to reconsider this finding having regard to the additional information and clarification provided, noting the Departments response is consistent with the Royal Commission's recommendation increasing the transparency of decision making and processes.

Defence and Veterans' Service Commission's annotation for Finding 4

We added the text: 'Whilst I accept submissions from both departments that publishing internal guidelines promotes transparency about their processes, I am not convinced that a guideline produced for the purpose of assisting staff to administer the provisions of the FOI Act is a substitute for user-friendly information that is easily accessible, easily understood and aimed at assisting those

engaging with the process for the first time. I do not suggest replacing these documents, but rather they should be supplemented by clear, user-friendly public guidance.'

Recommendation 10 – Finding 5

DVA's website has only very limited information about redaction and does not fill the gap left by deficiencies in the Redaction Guidelines.

Department of Veterans' Affairs response to Finding 5

The DVA 'Accessing Information' webpage was reviewed and updated in 2025 to improve the accessibility and clarity of public-facing information about information access pathways, including Freedom of Information and Administrative Access methods. The page includes a Frequently Asked Questions (FAQs) section which contains information explaining why redactions may be applied to released documents, and a direct reference to the DVA Redaction Guidelines to support applicants who require further detail about the redaction process.

This information can be found online through the following link:

FOI & PIR Frequently Asked Questions (FAQs) | Department of Veterans' Affairs

DVA asks the DVSC to reconsider this finding having regard to the additional information and clarification provided, such as the FAQ information available to applicants.

Defence and Veterans' Service Commission's annotation for Finding 5

We added the text: 'For example, the DVA website states that redactions may be made for 'security reasons' but does not explain what 'security reasons' might be.'

Recommendation 10 – Finding 6

The workshops undertaken by DVA with a range of stakeholders appear to have consisted consultation rather than co-design, due to a lack of participant involvement in drafting the final product:

- True co-design, where the participants could have had meaningful input into the final version of the product would have significantly enhanced both the DVSC assurance and public confidence that the published material was designed with the ordinary user in mind and meaningfully incorporated the views of the ADF community
- the guidelines were ultimately not finalised through a co-design process

Department of Veterans' Affairs response to Finding 6

DVA notes that the development of the redaction material was progressed through a Defence-led process, with DVA contributing to ensure consistency of approach, terminology and applicant guidance across the two departments. Stakeholder consultation informed the drafting of the documents, including consideration of whether the material was clear, accessible and appropriately targeted to applicants seeking to understand redactions in an information access context.

DVA understands that feedback received through that process was limited and did not identify substantive trends, systemic issues or material drafting changes that required a further formal co-design process to be undertaken by DVA before the documents were finalised. DVA was also advised that co-design activity had been undertaken by an external organisation engaged through the

Defence-led process, which consulted with current serving ADF members, veterans, family members and advocates.

On that basis, DVA considers the development process provided a reasonable evidence base to inform the published material, while recognising that any future substantive revision to the Guidelines would need to be progressed in consultation with Defence to maintain a consistent whole-of-government approach.

Defence and Veterans' Service Commission's annotation for Finding 6

No amendments.

Recommendation 10 – Finding 7

The mechanism used in the 'co-design' workshops for assessing improvements to public understanding of how redactions are applied is limited and flawed:

- asking workshop participants whether they thought their understanding of redactions would improve if changes were implemented is not a reliable indicator of the impact of the final products
- it also does not take into account the potential additional understanding gained by workshop participants by being involved in the process, which may skew results
- DVSC does not consider this capable of meeting the full intent of the recommendation

Department of Veterans' Affairs response to Finding 7

Consistent with DVA's response at 10.6, the development of the redaction material was progressed through a Defence-led process, with DVA contributing to ensure alignment of approach, terminology and applicant guidance across both departments. An external organisation was engaged through that process to undertake co- design activity with current serving ADF members, veterans, family members and advocates, and that evidence of this work has previously been provided. (refer DVA responses to Questions 12-16, DVSC-RFI-01).

DVA acknowledges that workshop participant feedback is one form of evidence and is not, of itself, a complete measure of long-term public understanding or implementation effectiveness. However, DVA considers it was an appropriate and proportionate mechanism to inform the development of the published material at the time, particularly when considered alongside the broader consultation process, Defence-led governance, and subsequent publication of aligned redaction guidance and supporting applicant education material. On that basis, DVA considers the process provided a reasonable evidence base to support implementation of the recommendation, while recognising that any future substantive revision to the Guidelines or related education material would need to be progressed in consultation with Defence to maintain a consistent whole-of- government approach.

Defence and Veterans' Service Commission's annotation for Finding 7

No amendments.

Recommendation 10 – Finding 8

DVA does not appear to have planned for, or conducted, any review of the effectiveness of the finalised products

Department of Veterans' Affairs response to Finding 8

In February 2026, the IAU commenced a preliminary review of the Redaction Guidelines to confirm that the content and associated processes remain aligned with Department of Defence practice and current OIAC guidance, including relevant FOI and Privacy Act principles. This review supports ongoing consistency across information access pathways and provides assurance that the Guidelines remain fit for purpose pending any further updates identified through future review or stakeholder feedback.

Website statistics provided previously (refer DVA responses to Question 17, DVSC-RFI-01) show that there was significant engagement with the published redaction guidelines from March 2023 to March 2024, followed by less engagement in the 2024-25 and 2025-26 periods. This suggested that the redaction guidelines were effective in providing support and direction to DVA staff and applicants alike and ongoing review of the documents, in consultation will Defence will occur as required.

Defence and Veterans' Service Commission's annotation for Finding 8

We added the text: 'DVA commenced a preliminary review of the Redaction Guidelines in February 2026 to ensure ongoing alignment with Defence and current OAIC guidance, which is commendable, but does not address my concerns regarding the effectiveness of the documents at conveying information to the public.'

Recommendation 10 – Finding 9

Information on redactions is clearly signposted on the DVA website but is difficult to navigate to from the DVA homepage. The Guidelines would benefit from more prominent placement.

Department of Veterans' Affairs response to Finding 9

Consistent with DVA's responses above, the Department's 'Accessing Information' webpage was reviewed and updated in 2025 to improve the accessibility and clarity of public-facing information about information access pathways, including Freedom of Information and Administrative Access. The page includes a Frequently Asked Questions (FAQs)[9] section that explains why redactions may be applied to released documents and provides a direct reference to the DVA Redaction Guidelines for applicants seeking further detail about the redaction process.

DVA notes the Commissioner's observation about navigation from the homepage and will consider whether the prominence and discoverability of this material can be further improved through future website updates.

Defence and Veterans' Service Commission's annotation for Finding 9

No amendments.

[9] FOI & PIR Frequently Asked Questions (FAQs) | Department of Veterans' Affairs

Recommendation 10 – Finding 10

The Guidelines are not designed with the public in mind and the information on the website is not an effective substitute.

Department of Veterans' Affairs response to Finding 10

The 2023 Redaction Guidelines were developed with transparency and public accessibility as key considerations, while also preserving the technical accuracy required to support consistent decision-making under the relevant information access frameworks. Stakeholder engagement was undertaken and informed the development of the Redaction Guidelines, alongside consultation between DVA and Defence to promote consistency for applicants engaging with either department. The Guidelines were published externally to support transparency, inform veterans and families seeking further detail about redactions, and complement the public-facing information available through DVA's Accessing Information webpage, related FAQs and the information on redactions available on the OAIC website (refer previous evidence provided by DVA in response to Questions 12-16, DVSC- RFI-01).

Furthermore, DVA prepared and published the Redaction Guidelines to provide a consistent departmental framework for staff applying redactions during the release of information, and to give applicants greater visibility of how and why redactions may be applied. The Guidelines also provide the foundation for public-facing website content and education material for veterans, families and representatives, including information explaining redactions and directing applicants to further guidance where required.

Defence and Veterans' Service Commission's annotation for Finding 10

No amendments.

Recommendation 10 – Finding 11

Public submissions indicated that applicants are not consistently given information about redactions.

Department of Veterans' Affairs response to Finding 11

To assist DVA in its response to these preliminary findings it would be beneficial to ensure a comprehensive and meaningful response is provided if the deidentified feedback received during the public submission phase was shared with regards to this point. This additional evidence the DVSC is relying on would enhance our understanding of the issues and recommendations laid out by the DVSC.

Where an information access decision is issued and exempt or otherwise protected material is identified, the decision maker provides an explanation of the redactions in the relevant statement of reasons, decision letter or applicant communication. This includes identifying the applicable legislative or policy basis for the redaction, and, where appropriate, directing the applicant to relevant review rights, guidance material or further support pathways. This approach is intended to ensure applicants receive case-specific information about why material has been withheld, in accordance with relevant legislation, while preserving the legal accuracy and consistency required across information access pathways.

Additional information on the information release process is also available to applicants on the DVA website.[10]

Defence and Veterans' Service Commission's annotation for Finding 11

No amendments.

Recommendation 10 – Finding 12

DVA has partially implemented this recommendation.

Department of Veterans' Affairs response to Finding 12

Disagree.

DVA has not had visibility of the evidence relied upon by the Commission to form this statement and is therefore not in a position to test or verify the basis for that assessment. As outlined in DVA's responses to 10.5 and 10.10, the Department has taken practical steps to improve public understanding of redactions by reviewing and updating the 'Accessing Information' webpage in 2025, publishing public-facing FAQs that explain why redactions may be applied, and providing direct references to the DVA Redaction Guidelines for applicants seeking further detail. These actions complement the publication of the Redaction Guidelines and support applicants to better understand how redactions may apply across information access pathways.

DVA also considers that improved outcomes are supported through case-specific applicant communication. Where material is redacted under the FOI Act, decision makers provide reasons in the relevant statement of reasons or decision letter, including the applicable legislative basis for the redaction and available review rights. Applicants are also directed, where appropriate, to OAIC guidance and other relevant support or redress pathways. This approach ensures applicants receive both general public-facing guidance and tailored explanations relevant to their individual matter, while maintaining the legal accuracy required under information access frameworks.

DVA asks the DVSC to reconsider this finding having regard to the additional information and clarification provided on this recommendation as outlined in the above responses.

Defence and Veterans' Service Commission's annotation for Finding 12

No amendments.

Recommendation 10 – Suggested Action 1

Create public facing education material aimed at improving the public's understanding of redactions with ease of understanding and accessibility in mind, and test that material with the public prior to publication.

[10] FOI & PIR Frequently Asked Questions (FAQs) | Department of Veterans' Affairs

Department of Veterans' Affairs response to Suggested Action 1

DVA notes the suggested action provided by the DVSC and will ensure these are incorporate into our continuous improvement program, noting measuring and understanding public understanding coupled with statutory responsibilities is challenging.

Defence and Veterans' Service Commission's annotation for Suggested Action 1

No amendments.

Recommendation 10 – Suggested Action 2

Additional ways to enhance understanding of redaction through the information release process, including consistently providing information to applicants, and plain language explanations of why text is being redacted.

Department of Veterans' Affairs response to Suggested Action 2

DVA is committed to ensure there is constancy and transparency with our decision making coupled with providing legislatively correct and accurate information.

Defence and Veterans' Service Commission's annotation for Suggested Action 2

No amendments.

Recommendation 11: Embed trauma-informed practices for information access

The intent of this recommendation is to embed trauma-informed practices, including a single point of contact, into all interactions with people seeking information from the departments.

Government Status	Commissioner's Assessment	Did implementation improve outcomes for veterans and members?
Implemented	Partially Implemented - subsequently amended to Implemented	Insufficient evidence

Recommendation 11 – Finding 1

By the end of June 2023, all DVA IAU staff had undertaken the Australian Public Service Commission's Foundations course. DVA later replaced this with the Trauma Informed Care Principles and Practice Training Module. The DVSC has not been provided with information on course content.

Department of Veterans' Affairs response to Finding 1

DVA staff engage with trauma informed training developed by FutureTrain Pty Ltd (refer previous evidence provided by DVA in response to Question 20, DVSC- RFI-01) which is available to all DVA staff through the Department's eLearning platform, DVATrain. The Trauma Informed Care Principles and Practice Training Module is recommended for staff providing services to veterans and their families; staff supporting or collaborating with colleagues across DVA; managers and leaders; staff in policy, processing, corporate, enabling and specialist roles; and anyone who would benefit from a deeper understanding of trauma- informed practice and how it support their function.

In relation to the training module, this module was developed externally and is hosted in DVATrain as a SCORM package. SCORM is a format designed specifically for delivering and tracking online learning through a learning management system. As a result, the content does not readily convert into a standalone document or presentation that can be extracted and shared.

In addition to the above training, the Department's Chief Psychiatrist, who is also a veteran, provides clinical and lived-experience oversight of DVA's trauma- informed training approach and its implementation across the Department. This role supports the alignment of training content with contemporary clinical practice, veteran experience and the practical needs of staff engaging with veterans, families and representatives. The Chief Psychiatrist's oversight also assists DVA to continue embedding trauma-informed principles in operational practice, including by informing training priorities, implementation considerations and ongoing improvement of staff capability.

DVA would welcome the opportunity to provide further information on course content, including any additional evidence, clarification or contextual information that may assist the Commissioner to form an evidence-based view of implementation, effectiveness and outcomes for applicants.

Defence and Veterans' Service Commission's annotation for Finding 1

We amended the text: 'I reviewed a slideshow of the course content, and it is aligned with DVA's trauma-informed principles. DVA also advised their Chief Psychiatrist works to support the alignment of training content with contemporary clinical practice and veteran experience.'

Recommendation 11 – Finding 2

DVA's IAU handles both admin release and FOI matters. However, most admin release matters appear to be handled by business areas, with only some escalated to the IAU. This is not consistent with the concept of a single point of contact.

Department of Veterans' Affairs response to Finding 2

The Information Access Unit operates as the Department's primary coordination point for administrative access requests and provides a centralised pathway for applicants seeking information under DVA's information access arrangements. This is established via information on the Accessing information website[11] and via Information.Access@dva.gov.au (refer previous evidence provided by DVA in response to Question 21, DVSC-RFI-01).

[11] Accessing Information | Department of Veterans' Affairs

DVA also maintains a range of established self-service and business-as-usual release mechanisms, including MyService and other online channels, which allow veterans to access certain personal information directly or receive routine documents from relevant business areas without unnecessary escalation. This operating model supports timely and proportionate release of information, while enabling matters requiring specialist information access assessment, coordination with Defence, or consideration under FOI or Privacy pathways to be managed through the IAU.

DVA asks the DVSC to reconsider this finding having regard to the additional information and clarification provided on this recommendation.

Defence and Veterans' Service Commission's annotation for Finding 2

We amended the text: 'DVA further explained they [maintain] a range of established self-service and business-as-usual release mechanisms, including MyService and other online channels, which allow veterans to access certain personal information directly or receive routine documents from relevant business areas without unnecessary escalation. This…supports timely…release of information.

Whilst this approach may risk a lack of continuity in client service where requests need to be escalated, and delays if matters are not escalated promptly, I acknowledge that it may allow for faster information release in straightforward matters, which is a desirable outcome. I encourage DVA to monitor this and actively mitigate any emerging risks…Positive steps have been taken. Although the IAUs are not operating as true single points of contact within either department, both DVA and Defence have implemented approaches that seek to balance the lack of continuity with other advantages such as faster self-service.'

Recommendation 11 – Finding 3

DVA IAU staff are required to undertake the trauma-informed training and annual refreshers. However, it is not clear whether it is also mandatory for other areas, including 1800 Veteran staff. This is important, as 1800 Veteran staff are the first point of contact for many people seeking help with DVA processes. It also is not clear whether SES in charge of the IAU team are required to undertake this training. The Commissioner's view is they should be.

Department of Veterans' Affairs response to Finding 3

As outlined in previous evidence provided by DVA in response to Question 20 (DVSC-RFI-01) and in response to 11.1, it is recommended for staff providing frontline services to complete the Trauma Informed Care Principles and Practice Training Module on DVA's eLearning platform. This includes staff supporting or collaborating with colleagues across DVA; managers and leaders; staff in policy, processing, corporate, enabling and specialist roles; and anyone who would benefit from a deeper understanding of trauma-informed practice and how it supports their function.

Defence and Veterans' Service Commission's annotation for Finding 3

We amended the text to say: 'Whilst the training is available to all staff and recommended for staff providing frontline services, it is not compulsory for any other areas, including 1800 VETERAN.'

Recommendation 11 – Finding 4

The Commissioner is satisfied with the trauma-informed principles DVA produced, however these are only lightly reflected in departmental policies and procedures. The Commissioner is not confident that they have been embedded across practice.

b) Defence's trauma-informed principles include practical, actionable dot-points on the ways the principles can be implemented. DVA's do not.

Department of Veterans' Affairs response to Finding 4

DVA considers that trauma-informed practices are embedded through a combination of staff training, operational guidance, applicant communication practices, escalation pathways and case-by-case consideration of vulnerability, sensitivity and support needs.

The Department also notes that relevant business areas, including frontline and client-facing functions, have access to trauma-informed training and supporting guidance to assist staff to apply these principles in practice.

DVA asks the DVSC to reconsider this finding having regard to the additional information and clarification provided on this recommendation, additional DVA seeks further advice from the DVSC on what materials it would consider to meet the threshold of an embedded practice across the Department.

As outlined in response 11.1, since the Royal Commission, the Department has created and made permanent the position of Chief Psychiatrist. The Chief Psychiatrist is also a veteran and provides clinical and lived-experience oversight of DVA's trauma-informed training approach and its implementation across the Department.

Defence and Veterans' Service Commission's annotation for Finding 4

No amendments.

Recommendation 11 – Finding 5

DVA's Administrative Release Guidelines reflect trauma-informed practices and prioritising this simpler method of release is, itself, a trauma-informed approach. However, the Guidelines themselves and the supporting Information Release Policy are designed for internal use, and therefore are not truly user-friendly and accessible for the public.

Department of Veterans' Affairs response to Finding 5

DVA asks the DVSC to reconsider this finding having regard to the additional information and clarification provided on this recommendation as outlined above.

Defence and Veterans' Service Commission's annotation for Finding 5

No amendments.

Recommendation 11 – Finding 6

DVA has not provided any evidence of trauma-informed email template or similar.

Department of Veterans' Affairs response to Finding 6

The Department has provided de-identified examples of IAU applicant correspondence for your consideration (Attachment 6). DVA asks the DVSC to reconsider this finding having regard to the additional information and clarification provided on this recommendation.

Defence and Veterans' Service Commission's annotation for Finding 6

We amended the text to say: 'DVA provided a de-identified example of an email, which notes that information an applicant sought may be prejudicial to their health and states that it will be released to their nominated treating psychologist. This email makes it clear this process has been discussed with the applicant in advance. This is a good example of trauma-informed practice.'

Recommendation 11 – Finding 7

DVA has implemented two warm handover processes:

- clients calling either 1800 Defence or 1800 Veteran can be transferred to the other helpline staff, without needed to hang up and redial to the correct helpline.
- Information access requests made to one department, but requiring some action by another can be transferred internally without needing to be returned to the applicant.

The Commissioner has not seen evidence demonstrating this is happening in practice.

Department of Veterans' Affairs response to Finding 7

The Information Access Unit Registration team review incoming requests for information access and determine if a request is better suited for action by Defence IAU or FOI teams. They contact the relevant areas of Defence to seek their agreement to transfer the request (under section 16 for FOI requests, as required by legislation) and notify the applicant that their request has been transferred to the correct authority for their action. These handovers are actioned and finalised within a target 48-hour window and are undertaken as required. A copy of the Registration supporting documents are attached for your reference (Attachments 7 and 8).

Promotion of specific content for veterans and families in the DVA website, a social media campaign and a VetAffairs article have supported the concept of warm handover in practice, and for staff in policy and guidance documents including the DVA Administrative Release Guidelines and intranet material (refer previous evidence provided by DVA in response to Question 21, DVSC-RFI- 01).

Defence and Veterans' Service Commission's annotation for Finding 7

We amended the text: 'DVA advised the departments have implemented handover processes between their helplines. Applicants calling either 1800 DEFENCE or 1800 VETERAN can be transferred to the other helpline by staff, without needing to hang up and redial the correct helpline. Additionally, information access requests made to one department, but requiring some action by the other, can be transferred internally without needing to be returned to the applicant. This is a welcomed improvement.

DVA provided an internal guidance document evidencing this process, which includes a requirement that IAU staff seek the applicant's consent to transfer the request to Defence, or their agreement to withdraw the request and remake it to Defence. This is an appropriate approach, allowing the applicant to maintain control of the request, but without unnecessarily burdening them.'

Recommendation 11 – Finding 8

Public submissions reflected mixed views on whether interactions with the departments are trauma informed.

Department of Veterans' Affairs response to Finding 8

See responses to 11.3 and 11.4 [refer to Recommendation 11, Findings 3 and 4] . DVA notes that trauma-informed practice is supported through staff training, operational guidance and case-by-case consideration of applicant needs; however, the Department is not able to fully assess or respond to the proposition without further information being provided by the DVSC.

To assist DVA in its response to these preliminary findings it would be beneficial to ensure a comprehensive and meaningful response is provided if the deidentified feedback received during the public submission phase was shared with regards to this point. This additional evidence the DVSC is relying on would enhance our understanding of the issues and recommendations laid out by the DVSC.

DVA would welcome the opportunity to better understand the specific issues raised, test those concerns against available departmental data and operational processes, and provide any further clarification, evidence or contextual information that may assist the DVSC.

Defence and Veterans' Service Commission's annotation for Finding 8

No amendment.

Recommendation 11 – Finding 9

One submission indicated they experienced obstructions from business areas, suggesting a need for trauma-informed training to be expanded beyond the IAU team.

Department of Veterans' Affairs response to Finding 9

To assist DVA in its response to these preliminary findings it would be beneficial to ensure a comprehensive and meaningful response is provided if the deidentified feedback received during the public submission phase was shared with regards to this point. This additional evidence the DVSC is relying on would enhance our understanding of the issues and recommendations laid out by the DVSC.

Defence and Veterans' Service Commission's annotation for Finding 9

No amendment.

Recommendation 11 – Finding 10

As the IAU is not operating as a true single contact point, and trauma informed practices are not embedded in the department, the Commissioner considers that DVA has partially implemented this recommendation.

Department of Veterans' Affairs response to Finding 10

DVA asks the DVSC to reconsider this finding having regard to the additional information and clarification provided on this recommendation captured in the above responses.

Defence and Veterans' Service Commission's annotation for Finding 10

We amended the text to say: 'Defence and DVA have taken steps to implement this recommendation including establishing IAUs and a single point of contact approach; training staff in trauma-informed practices; reflecting trauma-informed practices in some policies, procedures and templates; and creating warm transfer processes between the two departments. While I think more can be done to further embed trauma-informed practices into both departments, including a clear schedule for training and refreshers and a review of policies and procedures to further incorporate trauma-informed practices, I assess that Defence and DVA **implemented** this recommendation

Recommendation 11 – Finding 11

The Commissioner lacks sufficient evidence to assess whether the changes made have been effective in improving the experience for applicants.

Department of Veterans' Affairs response to Finding 11

DVA asks the DVSC to reconsider this finding having regard to the additional information and clarification provided on this recommendation captured in the above responses, including further advice regarding methodologies or evidence that would be considered as providing effective improvements to the experience for applicants, noting statutory and legislative requirements.

Defence and Veterans' Service Commission's annotation for Finding 11

We added the text: 'In order to assess effectiveness, further evidence of the public experience of administrative release requests in DVA escalated from a business area to the IAU, and information requests in Defence transferred between the IAU and the FOI team or vice versa would be needed to determine whether the decision to take these split approaches over a single point of contact has been appropriate.'

Recommendation 11 – Suggested Action 1

DVA should consider:

a) Incorporating trauma-informed practices and principles more explicitly into their IAU and FOI Standard Operating Procedures
b) Maintaining a team that operates as a single point of contact and case management across information release pathways, that is well-resourced, trauma informed, has a clear operating model and is regularly evaluated for effectiveness
c) Developing and rolling-out a plan for ongoing trauma- informed training across the departments, including actively considering other areas that may benefit from undertaking this training, such as business areas which are regularly called upon to provide information.

Department of Veterans' Affairs response to Suggested Action 1

Applicants seeking information from the IAU under FOI, Privacy and AA mechanisms are engaged with and reviewed on a case by case basis under the relevant legislation and guidelines. Where applicants are identified as requiring a trauma informed approach, the Information Access Officer (IAO) can review how they communicate with, provide information to and seek consultation with the applicant. Where an applicant has existing client coordination supports in place, the IAO also proactively engages with this process.

DVA notes the suggested actions provided by the DVSC and is committed to a continuous improvement process with regarding to ensure transparency and access to information.

Defence and Veterans' Service Commission's annotation for Suggested Action 1

No amendment.

Recommendation 12: Increase opportunities to provide up-to-date consent for information access

The intent of this recommendation is that serving and ex-serving members should be provided with additional, easy, and regular ways by which they can provide or change their consent to share information with others.

Government Status	Commissioner's Assessment	Did implementation improve outcomes for veterans and members?
Implemented	Not Implemented - subsequently amended to Partially Implemented	No – subsequently amended to Insufficient Evidence

Recommendation 12 – Finding 1

DVA outlined a plan for scoping and costing IT enhancements necessary to resolve disparate consent storage systems. However, the Commissioner has not received any evidence of this work is being undertaken.

Department of Veterans' Affairs response to Finding 1

DVA has undertaken substantive work through the Handling of Personal Information Project (HOPI) to identify and assess consent-related privacy risks across the Department. The HOPI Stocktake established a baseline DVA privacy inventory, including collection channels, consent practices, storage, sharing/disclosure and related processes, and subsequent privacy inventory updates have enabled DVA to identify highest privacy risks and disparate systems.

This work provides the evidence base required to inform future scoping and costing of IT enhancements to address fragmented consent storage arrangements. The transition of HOPI into an ongoing Privacy Assurance function, supported by Executive Board approval and an annual privacy inventory update cycle, provides a sustained governance mechanism to validate current practices, prioritise risk areas and inform any future system remediation or investment decisions.

Defence and Veterans' Service Commission's annotation for Finding 1

We amended the text to say: 'DVA completed a review of existing consent mechanisms in October 2022. In March 2023 their Closure Report noted that immediate opportunities to improve ways to provide or amend consent had been identified, and has advised they have undertaken significant baselining work through their Handling of Personal Information Project. However, it is not clear whether these have or will be implemented.

DVA also identified that consent forms and other consent information was collected by multiple business areas and stored in different, unconnected systems across the department. Harmonisation would require a significant investment in IT systems. DVA outlined a plan for scoping and costing these IT enhancements. However, I did not receive evidence of this work being conducted, and it is not clear when the scoping will take place.'

Recommendation 12 – Finding 2

The Commissioner has not received any evidence that additional mechanisms for giving or updating consent were identified or implemented.

Department of Veterans' Affairs response to Finding 2

The Department previously advised the Commission of information published on the DVA website in March 2023 outlining how and why to update consent (refer previous evidence provided by DVA in response to Questions 23-28, DVSC-RFI-01). Further consultation was undertaken including a social media campaign to veterans and families promoting the new web content on consent.

The DVA IAU has increased its emphasis on re-validating consent for subsequent information access requests. As part of its business practices, the IAU contacts applicants directly where up to date consent information is not available to provide an opportunity for confirmation of information or updates. This is in line with the Privacy Act and existing processes across multiple business areas prior to releasing information or discussing personal details with DVA clients.

Further information on providing consent in available on the DVA website[12] and DVA's personal information request form.[13]

DVA asks the DVSC to reconsider this finding having regard to the additional information and clarification provided on this recommendation captured in the above responses.

Defence and Veterans' Service Commission's annotation for Finding 2

We amended the text to say: 'I consider education campaigns valuable in that they remind members and veterans of the importance of updating consent. However, a point-in-time campaign is necessarily limited and will not continue to benefit members and veterans in the future. For it to be truly effective, ongoing education is required.

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[12] FOI & PIR Frequently Asked Questions (FAQs) | Department of Veterans' Affairs

[13] Personal information request form | Department of Veterans' Affairs

DVA also reported that, from March 2023, their IAU strengthened its operational emphasis on re-validating consent for subsequent information access requests (in cases where consent had already been given to release information to a third party in relation to a previous request). They also noted the IAU 'contacts applicants directly where current consent information is not available'. This appears to have been part of IAU implementation. I also note, however, that DVA does not appear to have addressed the Royal Commission's concern regarding more long-term consent for loved ones and next-of-kin who are not named executors of a will, allowing them to access relevant information about a deceased member.'

Recommendation 12 – Finding 3

DVA provided evidence of website hits on its new consent material for the first month after publication. This does not demonstrate effectiveness

Department of Veterans' Affairs response to Finding 3

DVA notes the recommendation from the DVSC and would welcome further advice on methodology and other practices which would support the demonstration of effectiveness. DVA is committed to continuous improvement and would look to have this advice incorporated into a forward program of work.

Defence and Veterans' Service Commission's annotation for Finding 3

We added the text: 'such as numbers of members or veterans with up-to-date consent arrangements and numbers of members or veterans proactively updating them.'

Recommendation 12 – Finding 4

DVA did not conduct any subsequent reviews.

Department of Veterans' Affairs response to Finding 4

DVA has undertaken substantive work through the Handling of Personal Information Project (HOPI) to identify and assess consent-related privacy risks across the Department. The HOPI Stocktake established a baseline DVA privacy inventory, including collection channels, consent practices, storage, sharing/disclosure and related processes, and subsequent privacy inventory updates have enabled DVA to identify highest privacy risks and disparate systems.

Defence and Veterans' Service Commission's annotation for Finding 4

No amendment.

Recommendation 12 – Finding 5

Submissions reflect mixed views on privacy and information disclosure.

Department of Veterans' Affairs response to Finding 5

Neutral with comment.

DVA remains committed to supporting a transparent and evidence-based assessment process. To assist DVA in its response to these preliminary findings it would be beneficial if the deidentified feedback received during the public submission phase was shared with regards to this point. This additional evidence the DVSC is relying on would enhance our understanding of the issues and recommendations laid out by the DVSC. Further information would enable DVA to understand the specific privacy and information disclosure concerns raised, assess those matters against relevant legislative obligations, departmental processes and available operational data, and provide any further clarification, evidence or contextual information required to support the DVSC.

Defence and Veterans' Service Commission's annotation for Finding 5

No amendment.

Recommendation 12 – Finding 6

DVA has not implemented this recommendation, and sufficient action has not been taken in a timely way.

Department of Veterans' Affairs response to Finding 6

DVA asks the DVSC to reconsider this finding having regard to the additional information and clarification provided on this recommendation captured in the above responses.

The Department previously advised the Commission that information was published on the DVA website in March 2023 explaining how and why consent can be provided or updated. This implementation activity was supported by further consultation and public communication, including a social media campaign directed to veterans and families to promote the new web content on consent. DVA considers these actions demonstrate that additional opportunities and public-facing guidance were made available to support serving and ex-serving ADF members, veterans, families and representatives to understand and update consent arrangements.

The DVA Information Access Unit has also strengthened its operational emphasis on re- validating consent for subsequent information access requests. As part of its business practices, the IAU contacts applicants directly where current consent information is not available, providing applicants with an opportunity to confirm existing consent information or provide updated consent before information is released or personal details are discussed.

This approach is consistent with the Privacy Act and reflects existing practices across multiple DVA business areas to confirm authority before releasing information or engaging with representatives. Further information about providing consent is available on the DVA website and through DVA's personal information request form.

Defence and Veterans' Service Commission's annotation for Finding 6

We amended the text to say: 'On the basis that some steps have been taken to provide members and veterans a greater understanding of consent mechanisms and encourage them to update their consent, as well as review current consent mechanisms and identify further opportunities for consent provision or update, I assess that Defence and DVA partially implemented this recommendation with timeliness concerns.'

Recommendation 12 – Finding 7

At this point in time the Commissioner's assessment is that the implementation of this recommendation is not effective.

Department of Veterans' Affairs response to Finding 7

DVA asks the DVSC to reconsider this finding having regard to the additional information and clarification provided on this recommendation captured in the above responses.

Defence and Veterans' Service Commission's annotation for Finding 7

We amended the text to say: 'There is insufficient evidence to assess whether the changes made have been effective in increasing members and ex-serving members' up-to-date consent to share information with others.'

Recommendation 12 – Finding 8

Implementation of the outcomes of the March 2023 review.

Department of Veterans' Affairs response to Finding 8

DVA is unable to provide a substantive response to this suggested action on the information currently available. The source, scope and content of the referenced March 2023 review have not been identified in the material provided, and DVA is therefore unable to confirm which review, report or implementation record is being referenced.

DVA has since established the Information Access Unit (IAU) as a dedicated function to support coordinated management of information release for ADF members, veterans, families and representatives. The IAU provides a centralised pathway for matters requiring specialist information access assessment, supports consistent triage and referral across access mechanisms, and enables more direct engagement with applicants where consent, proof of identity or pathway clarification is required.

Implementation actions have included applying a shared set of trauma-informed principles developed with Defence, ensuring staff complete trauma-informed training, updating public-facing information on access pathways and consent, and reinforcing business practices that prompt staff to confirm or revalidate consent before information is released. These actions have improved consistency in language, process and applicant guidance across the Department and provide a practical foundation for ongoing monitoring, refinement and further evidence-based assessment of effectiveness.

Defence and Veterans' Service Commission's annotation for Finding 8

We clarified the suggested action: 'DVA should actively consider implementation of the mechanisms referenced in their Closure Report to improve ways to provide or amend consent.'

Recommendation 13: Co-design education on information access mechanisms

The intent of this recommendation is to ensure the departments work with the Defence and veteran community to develop accessible guidance about ways to access information from Defence and DVA.

Government Status	Commissioner's Assessment	Did implementation improve outcomes for veterans and members?
Implemented	Partially Implemented	Insufficient Evidence

Recommendation 13 – Finding 1

DVA establish a framework for assessing the effectiveness of recommendations, incorporating feedback from the member and veteran community and relevant data.

Department of Veterans' Affairs response to Finding 1

DVA supports the intent of establishing an effectiveness framework and remains committed to using available evidence to assess implementation progress and applicant outcomes. The Department notes that complaints and feedback are received and managed through the CFMS Team, which coordinates departmental responses in accordance with established feedback and complaints handling processes. Where complaints relate to information access processes, they are referred to the Information Access Unit for response and further action to address the applicant's concerns.

DVA notes that any assessment framework would need to identify the relevant feedback data available to the Department, clarify the benchmarks against which effectiveness is to be measured, and distinguish between implementation activity, service performance and applicant outcome measures. DVA would welcome further clarification from the Commissioner on the specific feedback data and performance benchmarks intended to inform this assessment and can provide further information about existing complaint handling, referral and response processes, including any additional supporting evidence, if required.

Defence and Veterans' Service Commission's annotation for Finding 1

No amendment.

Recommendation 13 – Finding 2

DVA's guidelines are generally clear and useful. However, the documents designed for staff are generally ill-suited for use by the public.

Department of Veterans' Affairs response to Finding 2

DVA asks the DVSC to reconsider this finding having regard to the additional information and clarification provided. in response to 11.6 and previous evidence provided by DVA in response to Questions 29-34, DVSC-RFI-01.

Defence and Veterans' Service Commission's annotation for Finding 2

No amendment.

Recommendation 13 – Finding 3

For the reasons explained in relation to recommendation 10, although consultation is a positive step, without true co-design of the final product the Commissioner does not consider the full intent of the recommendation met.

Department of Veterans' Affairs response to Finding 3

DVA asks the DVSC to reconsider this finding having regard to the additional information and clarification provided. DVA notes that development of the relevant information access and redaction education material was progressed through a Defence-led process, with DVA contributing to ensure consistency of approach, terminology and applicant guidance across the two departments.

Stakeholder consultation informed the drafting of the documents, including consideration of whether the material was clear, accessible and appropriately targeted to applicants seeking to understand information access pathways and redactions. DVA understands that feedback received through that process was limited and did not identify substantive trends, systemic issues or material drafting changes that required a further formal co-design process to be undertaken by DVA before the documents were finalised.

Co-design activity was undertaken by an external organisation with relevant expertise who was engaged through a Defence-led process. Participants included current serving ADF members, veterans, family members and advocates. This is consistent with the implementation evidence for Recommendation 13, which records that thirteen co-design workshops, comprising both face-to-face and virtual sessions, were undertaken nationally and engaged 96 individual veterans, serving members, family members and representatives.

DVA understands that the insights derived from those workshops informed the development of tailored redaction guidelines and supporting educational materials that clearly outline how redactions may be applied to information access requests in Defence and DVA. Defence and DVA subsequently produced aligned Redaction Guidelines and a range of supporting applicant education materials, which were published in March 2023.

On that basis, DVA considers the development process provided a reasonable evidence base to inform the published material and demonstrates that stakeholder input was incorporated into the design and drafting process. DVA recognises that any future substantive revision to the Guidelines or related education material would need to be progressed in consultation with Defence to maintain a consistent whole-of-government approach.

Defence and Veterans' Service Commission's annotation for Finding 3

No amendment.

Recommendation 13 – Finding 4

The Commissioner does not have the data on complaints or feedback relating to the website or information access guidance material from DVA.

Department of Veterans' Affairs response to Finding 4

DVA provided complaints data in response to the Commission's original request (refer previous evidence provided by DVA in response to Question 34, DVSC-RFI-01), which requested data on complaints or feedback about the co-design process or the education material produced as a result of the co-design process, not 'the website'.

DVA does not maintain a separate ongoing log of website feedback once individual website jobs are actioned and cleared.

If the Commission is seeking broader website-specific feedback data beyond the complaints information previously requested and provided, DVA would welcome clarification of the scope of that request and can consider whether further information may be available through the CFMS feedback team.

Defence and Veterans' Service Commission's annotation for Finding 4

No amendment.

Recommendation 13 – Finding 5

Public submissions reflected:

- difficulties with DVA's AI function producing unreliable results
- the volume of material on the website as daunting and difficult to navigate effectively
- difficulties accessing information about deceased members without probate, even where probate is not legally necessary.

Department of Veterans' Affairs response to Finding 5

To assist DVA in its response to these preliminary findings it would be beneficial if the deidentified feedback received during the public submission phase was shared with regards to this point. This additional evidence the DVSC is relying on would enhance our understanding of the issues and recommendations laid out by the DVSC.

Further information would enable the Department to better understand the specific issues raised by submitters, test those concerns against available departmental data and operational processes, and provide any further clarification, evidence or contextual information that may assist the DVSC.

Defence and Veterans' Service Commission's annotation for Finding 5

No amendment.

Recommendation 13 – Finding 6

DVA has not conducted post-closure reviews on the effectiveness of the material.

Department of Veterans' Affairs response to Finding 6

DVA notes the recommendation from the DVSC and is committed to continuous improvement, as part to the closure process for Recommendation 13, DVA reviewed the implementation of this recommendation (refer closure report attached).

As noted above, DVA's admin access scheme has tracked an increase in the trend towards admin access, away from FOI, over several years. A reduction in matters recorded as transferred from FOI to Administrative Access may indicate that applicants are better informed about the most appropriate access pathway at the point of lodgement. Equally, applicant uptake of Administrative Access may also reflect the effectiveness of public education material where applicants elect that pathway directly. These indicators are not mutually exclusive and should be considered alongside the scope, sensitivity and complexity of requests, noting that some matters will appropriately remain within FOI or Privacy Act pathways and will not be suitable for Administrative Access release.

Defence and Veterans' Service Commission's annotation for Finding 6

We added the text: 'In response to my preliminary findings, DVA advised that the successful increase of administrative release as the preferred information pathway indicates a better public understanding of the most appropriate access pathways. I accept this. However, this is only one component of the information access ecosystem.'

Recommendation 13 – Finding 7

The Commissioner's assessment is that DVA has partially implemented this recommendation.

Department of Veterans' Affairs response to Finding 7

DVA asks the DVSC to reconsider this finding having regard to the additional information and clarification provided. The Department has taken substantive implementation action to improve public education and access to information mechanisms, including reviewing and updating website content in 2025 to provide more accurate, targeted and applicant- focused information about available access pathways.

This work supports applicants to better understand the distinction between Administrative Access, Freedom of Information and Privacy Act pathways, and to identify the most appropriate mechanism for their circumstances. DVA has also maintained online and downloadable request options, improved webform functionality to support more complete lodgement information, and introduced digital assistance, including the DVA AI chatbot, to help users locate relevant webpages and information more quickly.

While DVA remains open to further refinement of these tools and to any practical suggestions from the DVSC, the Department considers these actions demonstrate active implementation of Recommendation 13 and a clear commitment to improving the accessibility, accuracy and usability of information access education material.

Defence and Veterans' Service Commission's annotation for Finding 7

No amendment.

Recommendation 13 – Finding 8

The Commissioner's assessment is that there is insufficient evidence to determine whether outcomes have improved.

Department of Veterans' Affairs response to Finding 8

DVA asks the DVSC to reconsider this finding having regard to the additional information and clarification provided.

Defence and Veterans' Service Commission's annotation for Finding 8

No amendment.

Recommendation 13 – Suggested Action 1

Reviewing existing guidance material and where necessary update it or produce new material to ensure that it is fit-for-purpose to enhance public understanding of information release, and test that material with the public prior to publication.

Department of Veterans' Affairs response to Suggested Action 1

DVA will continue to review staff guidance, training materials and externally published processing guidelines to ensure that they are fit for purpose.

Defence and Veterans' Service Commission's annotation for Suggested Action 1

No amendment.

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