

11 August 2026

Mr Stephen Bray  
Chief Executive Officer and Commissioner for Legal Services Regulation  
Legal Services Council  
Level 3, Public Trustee Building, 19 O'Connell Street  
SYDNEY NSW 2000

By email: [submissions@legalservicescouncil.org.au](mailto:submissions@legalservicescouncil.org.au)

Dear Stephen

**Consultation paper: Enabling corporate (in-house) legal practitioners to support related entities of their employer**

Thank you for seeking our view on your proposal to amend the Legal Profession Uniform General Rules (**General Rules**) to enable corporate legal practitioners within non-company entities (such as universities) to provide legal services to related entities of their employer.

The Law Society of NSW is broadly supportive of amending the General Rules to contain a definition of 'related entity' for non-companies, and that this definition refer to, or incorporate, the control test similar or identical to subsection 50AA of the *Corporations Act 2001* (Cth), so to adequately allow corporate legal practitioners to provide legal services to controlled entities within the same non-company organisational group.

We consider however, that it would be inappropriate for this definition to extend to arrangements where a university (or other non-company) runs or controls another entity that provides legal advice or legal services to third parties, such as students or members of the public. Such arrangements would not fall within the scope of work carried out by a corporate practitioner. Legal services to third parties must be independently provided by a separate qualified entity, and supervised by an authorised principal who holds professional indemnity insurance. Examples of such arrangements may include community legal centres, or Student Representative Councils which offer legal advice to students.

In addition, if the General Rules are to be amended, it may be beneficial to remind solicitors that, whether providing services as a corporate legal practitioner or employee practitioner, they must be able to avoid or manage any conflicts of interests that may arise, as required by the Solicitors' Conduct Rules.

**Broader reforms to the Uniform Law to make regulation of all in-house lawyers fit for purpose**

As you are aware, we remain concerned that one of the first priority amendments to the Uniform Law - to broaden the definition of 'corporate legal practitioner' - is yet to occur.

While we understand amendments to the Uniform Law are outside the scope of this consultation, we remain hopeful that amendments will also soon be made to better reflect and facilitate modern corporate practice by allowing practitioners of corporate entities to provide services to their employer, and other entities within its

organisational group, beyond simply their subsidiaries or holding companies. We remain keen to discuss and continue our joint pursuit of this important and much needed amendment.

If you have any questions, please do not hesitate to contact [REDACTED]  
[REDACTED]

Yours sincerely,

[REDACTED]

**Ronan MacSweeney**  
President