



University of the
Sunshine Coast
Australia

18 June 2025

The Admissions Committee of the Legal Services Council (Council)
Law Admissions Consultative Committee (LACC)
submissions@legalservicescouncil.org.au

Dear Council and LACC,

Thank you for the opportunity to comment on the proposed *Accreditation Standards for Australian Law Courses*. Like all law schools we are committed to quality legal education and welcome elaboration on standards around online delivery, intensive teaching models and invigilated assessments. We also recognise the importance of national consistency of legal education. We believe that clarification is needed over one key aspect of the proposed standards.

Clarification on the emphasis on 'statutory interpretation'

At various stages, the proposed amendments emphasise the importance of statutory interpretation and appears to elevate statutory interpretation to the level of 'prescribed area/(s) of knowledge' (otherwise known as the Priestly 11). For example, and most importantly, at 4.7(b)(iv) the proposed text requires a law school to:

provide evidence that at least 50% of assessments for each unit that covers a prescribed area of knowledge and statutory interpretation is conducted by invigilation.

It is important to clarify what is meant by this emphasis on statutory interpretation. One interpretation might be that law schools are required to include a separate subject on statutory interpretation (and have 50% invigilated assessment for this course). Most law programs currently include the skill of statutory interpretation in a range of subjects (eg. Introduction to law, constitutional law, criminal law and procedure, and administrative law) rather than have a separate, dedicated course on statutory interpretation. It is our recommendation that statutory interpretation does *not* need to be taught or assessed in a standalone subject.

Yours sincerely,

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