

**RESPONSE TO THE ADMISSIONS COMMITTEE OF THE LEGAL SERVICES
COUNCIL AND THE LAW ADMISSIONS CONSULTATIVE COMMITTEE
CONSULTATION PAPER ON PROPOSED REVISIONS TO THE ACCREDITATION
STANDARDS FOR AUSTRALIAN LAW COURSES**

Introduction

The Victorian Legal Admissions Board (the Board) appreciates the opportunity to make a submission in response to the Admission Committee of the Legal Services Council (LSC) and the Law Admissions Consultative Committee's (LACC) *Consultation Paper on proposed revisions to the Accreditation Standards for Australian Law Courses* (the Accreditation Standards).

As the LSC is aware, the Board trialled the Accreditation Standards during the reaccreditation reviews of Victoria University and Melbourne Law School in 2017-18. It was the Board's practice during the trial period, and following the adoption of the Accreditation Standards by LACC, to include a discrete term of reference seeking feedback on the Accreditation Standards. For each of the reaccreditation reviews conducted between 2017 and 2025 – nine in total – assessors have been asked to report on the effectiveness of the LACC Standards in setting out clear, tangible criteria against which to assess the performance of the law school and to make any recommendations as to how the LACC Standards could be improved. The reports prepared in response to this term of reference (the cost of which was borne by the Board, not the affected law school) have been regularly provided to the LSC.

A commonly expressed concern has been the application of Standards 4.4 and 4.5 to online learning and a lack of clarity around what constitutes 'teaching' in distance and blended learning environments. The Board is therefore pleased that these matters are sought to be addressed in the proposed amendments to the Accreditation Standards. The Board confirms it has circulated the consultation paper and amended Standards to the assessors it engages on a regular basis and understands that individual submissions are likely to be made by them. The Board has also arranged to circulate the consultation paper and proposed amendments to members of the Academic Course Appraisal Committee (ACAC), which the Board established to assist it with the accreditation, monitoring and review of law courses. ACAC's membership includes representatives from each of the eight providers of accredited law courses in Victoria and the Board understands that providers intend to make their own submissions to the consultation.

Accordingly, the Board intends to largely confine its comments to the amendments pertaining to intensive and block learning models, whereby it is proposed that a higher standard be applied to the approval of such teaching methods than to other forms of content delivery. As the consultation paper records, Victoria approved an application by one law course provider to offer its degree using block learning. The Board considers it would be of assistance to the LSC to explain the circumstances in which that approval was granted. Although the Board does not cavil with the amendment per se, members nevertheless query whether an 'appropriate in all the circumstances' threshold is necessary. The Board trusts that an explanation of the process that it engaged in will demonstrate that the utmost care is already taken in considering applications to offer law courses in non-traditional formats.

Pathway to block learning approval

In May 2017, the Board received a letter from the Dean of an accredited law course provider informing it the university was engaging in a process to recognise the way in which its first-year subjects were delivered, including as part of the first year of the LLB. The aim was to provide an improved level and intensity of student learning and support by offering first year law subjects in serial rather than simultaneously, referred to as the 'block learning model'. The Board was provided with a range of explanatory materials that described the success of block learning models in Sweden and some North American institutions, and locally in graduate education settings. The Board was told that advantages for students include having a single focus rather than juggling multiple demands, encouraging immersion in each unit, and forming strong peer connections through close contact with one group. The Board was invited to make any comments or ask any questions about the proposal apropos the teaching of first year law.

The Board referred the correspondence to ACAC for advice. The Chair of ACAC convened a meeting to discuss the application, whereupon it was resolved that further information was required. The Dean was asked to provide ACAC with a copy of any revised first year subject course descriptions and with a comparison of the current and proposed first year course, with the differences between the two clearly identified. ACAC also asked the Dean to explain the following:

- the impact the block learning model would have on modes of assessment and teaching hours;
- whether any specific issues arose for students undertaking part-time or combined degrees;

- the consequences for progression if a student failed a subject;
- the catch-up arrangement that would be put in place where student progress was unsatisfactory; and
- the way in which a block learning model would facilitate the employment of interactive teaching methods and more authentic course assessment as compared with synchronous course delivery.

The Dean provided a comprehensive response. ACAC, and the Board, was also supplied with individual unit descriptions, learning objectives, assessment details, and Courses Approval and Management System (CAMS) entries. Relevantly, upon ACAC's consideration of the further material it became apparent that what was being proposed by way of interactive teaching methods in each block subject did not meet the requirements of Standard 4.4(b)(iv) of the LACC Accreditation Standards. ACAC was concerned that the allocation of time to 'reading, research, working on exercises and preparing for assessment tasks' did not constitute direct teaching methods, with the effect that the 36-hour requirement mandated by the Standards did not appear to be reached. The Dean was asking to explain how that defect would be remedied.

The Dean subsequently confirmed that each unit taught in a four-week block would comprise 36 hours of face-to-face teaching, with an additional 30 hours of private study per week. The Dean was then asked by ACAC to clarify assessment arrangements, including whether time devoted to assessment was included in the calculation of teaching hours, and to provide updated CAMS entries which reflected the amount of direct learning. Further, the Dean was asked to clarify whether each delivery session contained progressive, new material that addressed each module in the unit.

Upon receipt of the updated CAMS entries, ACAC again wrote to the Dean in respect of apparent inconsistencies in the materials for certain Priestley 11 subjects, which did not reveal the law school's stated commitment to delivering three teaching sessions per week to students, of three hours' duration, each containing new material. Correspondence continued to be exchanged for the remainder of the year, including a request by ACAC that the law school resolve inconsistencies between the CAMS entries and the information available on the university website.

The Board approved the introduction of block learning for the first year of the LLB in January 2018, on the recommendation of ACAC. The Board recorded in its letter to

the Dean that ACAC had carefully scrutinised the law school's applications, subsequent correspondence and supporting information, including updated CAMS entries. The Board further noted that sequencing the whole first year curriculum as intensives was novel. Accordingly, the Board imposed a condition on approval; namely that the law school undertake an early and systematic review of the impact of the model itself, including the impact on students, and provide the Board with a report containing the results of that review following the first year of implementation.

The law school submitted an interim report in July 2018, accompanied by a request to extend the block learning model to all years of the LLB degree. The report compared results from the end of the first semester of 2018 with the first semester in 2017. The report contained what were described as early indicators showing significant improvements in students' pass rates, attendance and retention across the first year. According to the report, feedback from students and teaching staff indicated several reasons for increased performance. The report stated:

In Law, studying one unit at a time ensures that a student knows how all they are studying relates to an area of law and this has lessened the confusion regarding which piece of information relates to which unit, or how a case may involve a number of areas of the law. The other benefit students have reported from only having one assessment piece due in at any one time, is that they are better able to engage with the exact requirements of the assessment and to better understand the nuances of the questions asked, and the knowledge and skills required.

The report also stated that student wellness, as measured by the number of special consideration applications, had improved significantly. The report concluded with the following statement: "The Block mode of learning is more intensive and does place different demands on students. However, the students have increased their engagement in the classes, attendance is improved and academic outcomes are stronger than in previous years." The Board subsequently approved the application of the block learning model across the LLB degree.

The Board conducted a reaccreditation review of the LLB in 2024, which had been taught in a block learning format for approximately six years. The Board appointed two external assessors to evaluate the degree against the LACC Accreditation Standards. The assessors' report was submitted in January 2025. The assessors found that the LLB, including combined degrees, met all Accreditation Standards in full.

In particular, the assessors found:

- all law courses (LLB Honours, LLB graduate entry and combined degrees) met or exceeded three years' equivalent full-time study of law;
- their investigation showed that the teaching hours in all relevant units (those containing Prescribed Areas of Knowledge content) in the law degrees is 36 hours or more, delivered face to face for in-person classes and via Zoom for online classes;
- online synchronous learning simulates the face-to-face learning approaches that occur in on campus classes, where academics and students engage in real time across the full compendium of teaching hours of 36 hours per unit; and
- students consulted during the site visit "confidently" confirmed that the teaching and learning methods adopted by the law school enabled them to acquire appropriate understanding and competence in the 'Priestley 11' material.

ACAC considered the report and adopted the assessors' recommendation that the LLB be reaccredited for five years without condition. The Board accepted ACAC's recommendation. The law school was advised of its reaccreditation in February 2025.

Ability to seek further information

The Board notes the proposed amendments to Standards 4.1 and 4.3, which seek to articulate the matters about which an admitting authority can request further information. The Board observes that the *Legal Profession Uniform Admission Rules 2015* already state at rule 8(4) that a provider of a law course **must** (emphasis added) provide such information to the Board or its reviewer as the Board or reviewer may require for the purpose of any monitoring or review carried out under this rule. The Board recognises that the Rules only apply to members of the Uniform Law and that the Model Rules, somewhat curiously, do not contain a similar provision. The Board suggests that consideration be given to including a general statement in the Accreditation Standards about providers' obligation to supply information, to avoid the potential for that obligation being interpreted as only applying to matters arising under Standards 4.1 and 4.3. Alternatively, the Model Rules could be amended to further conformity with rule 8(4).