

14 May 2026

The Hon Justice Francois Kunc
Chair of the Law Admissions Consultative Committee
Law Admissions Consultative Committee
PO Box H326
AUSTRALIA SQUARE NSW 1215

By email: submissions@legalservicescouncil.org.au

Dear Justice Kunc

Submission in Response to the National Review of Practical Legal Training

1. Introduction

ACAP University College welcomes the opportunity to provide this submission to the Legal Services Council (LSC) and the Law Admissions Consultative Committee (LACC) in relation to the national review of Practical Legal Training (PLT). This submission accompanies ACAP's completed LSC/LACC feedback form.

ACAP is a national higher education provider and an accredited provider of the Graduate Diploma of Legal Practice (GDLP), a TEQSA-accredited AQF Level 8 qualification. Through this program, ACAP delivers structured, practice-oriented training designed to support law graduates in their transition from academic study to supervised legal practice.

This submission responds to the findings of the *National Practical Legal Training Research Report (March 2026)* ("the national report"), which identify a high level of dissatisfaction with aspects of the current PLT framework, particularly in relation to coursework and perceived value.

At the outset, ACAP submits that the issues identified in the national research are best understood as arising from structural features of the current framework, rather than from any inherent deficiency in PLT as a stage of training. While aspects of the present model clearly warrant reform, it does not follow that PLT, as a distinct and structured stage within the pathway to admission, is unnecessary or incapable of performing its intended function.

The central issue is a misalignment within the current framework between the requirement to certify consistent graduate competencies and the variability across how different components of training are delivered. In particular, workplace-based learning can differ in structure and experience, which may affect how consistently those competencies are demonstrated. Addressing this at a framework level would support greater consistency and confidence in outcomes across the PLT pathway.

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1.1 Key Issues and Priority Concerns

In ACAP's submission, the issues identified in the national research are best understood as arising from a set of interrelated structural factors within the current framework. These factors are outlined below.

A. Structural Features of the Current Framework

- **Consistency within a variable training environment**

PLT providers are required to certify that graduates have attained the competencies necessary for admission within a framework that incorporates workplace-based learning. Differences in the structure and quality of these experiences can influence how consistently competencies are demonstrated, with implications for the comparability of outcomes across graduates.

- **Interdependence of system components**

The different stages of legal education and training are interdependent. Changes to law degrees, PLT, workplace experience or post-admission requirements cannot be designed in isolation. Reform in one area will necessarily affect others, and this interrelationship must be taken into account.

B. Variability and Inconsistency in Training Outcomes

- **Variability in workplace experience**

Workplace experience is widely regarded as valuable, but operates unevenly across the profession. The quality of supervision, the nature of tasks undertaken, and the learning outcomes achieved vary significantly between placements. This variability limits the reliability of workplace experience as a consistent training mechanism in and of itself.

- **Lack of a shared understanding of the role of PLT**

There is no consistent view across the profession as to what PLT is intended to achieve. In particular, expectations that PLT should produce "practice-ready" graduates do not reflect how professional competence is developed over time in supervised legal practice, including during the initial period of supervised practice required under practising certificate conditions. A clearer articulation of PLT as preparing graduates for supervision-ready practice would better align expectations with the realities of early professional development and assist in addressing current dissatisfaction.

C. Design and Delivery Challenges

- **Concerns regarding coursework are primarily pedagogical**

Dissatisfaction with coursework appears to be driven less by its existence than by its design, delivery and perceived relationship with academic study. Concerns regarding duplication and limited practical relevance point to issues of articulation and pedagogy, rather than to any redundancy in structured learning.

- **Balance between cost, time and quality**

Reform proposals that seek to reduce cost or duration must be considered carefully. Improvements in access or efficiency should not come at the expense of training quality. A sustainable model must recognise that reductions in time or cost may have consequences for educational outcomes.

D. Equity, Access and System Inclusion

- **Equity, access and inclusion concerns**

Access to PLT and workplace experience is not evenly distributed. Geographic location, financial constraints and reliance on informal networks can affect a graduate's ability to complete training. These issues have implications for diversity within the profession and must be considered as part of reform.

- **Risk of shifting training burden to employers**

There is a risk that reform may operate to transfer responsibility for training from regulated providers to employers, without corresponding obligations, support or oversight. The capacity of employers to deliver structured training varies significantly, and this approach may lead to less consistent outcomes across the profession.

- **Implementation complexity and transition risk**

Any significant reform will involve multiple interconnected changes, including law degree design, PLT delivery and supervised practice requirements. These changes will require careful sequencing, sufficient lead time and appropriate transitional arrangements to avoid disadvantaging students.

2. The Nature of the Problem Identified in the National Research

The national report identifies a high level of dissatisfaction with PLT, particularly among graduates. In ACAP's submission, these findings do not fully reflect the experience of PLT across all providers or components of training. Dissatisfaction is not uniform across PLT. Workplace experience is consistently identified as valuable, and in many cases as the most beneficial component of training. By contrast, concerns are more often directed toward aspects of coursework, particularly in relation to perceived duplication with university study and questions of practical relevance.

ACAP's internal student feedback reflects a different and more positive position. Satisfaction is consistently high in relation to teaching quality, student support and skills development, indicating strong confidence in the core educational elements of the program and its focus on practical capability. These outcomes reflect ACAP's approach to course design, which has been developed in consultation with the profession to ensure alignment with both student needs and employer expectations.

The research also indicates that dissatisfaction is closely linked to perceptions regarding the relationship between PLT and academic education, and to a view that practical skills are more effectively acquired in the workplace. While those perceptions are important, it does not follow that structured coursework is unnecessary. Rather, they suggest that the articulation between academic education, PLT and workplace learning is not functioning as intended. The research further highlights variability in outcomes. The quality of workplace experience differs significantly depending on the setting, the nature of supervision and the type of work undertaken. Similarly, experiences of coursework appear to vary depending on delivery model and level of engagement.

In ACAP's submission, this variability is a central feature of the current framework. It reflects not only differences in delivery, but also the absence of consistent standards across key components of training, particularly workplace experience. Any reform that increases reliance on workplace-based learning without addressing these inconsistencies is likely to reproduce, rather than resolve, the

issues identified in the research. In this context, the dissatisfaction identified in the research is best understood not as a rejection of PLT as a stage of training, but as a consequence of misalignment and inconsistency within the current framework.

3. Position on Key Reform Directions

3.1 Duration of PLT

The national report raises the possibility of reducing the duration of PLT. In ACAP's submission, any proposal to reduce the duration of PLT should be approached with caution. The national research does not demonstrate that duration, of itself, is the source of dissatisfaction. Rather, concerns are directed to the design, delivery and perceived relevance of coursework.

A reduction in duration, absent corresponding reform to the design and integration of training, risks diminishing the capacity of PLT to provide structured and assessable exposure to core competencies. It would also have the practical effect of increasing reliance on workplace experience, which, as the research makes clear, is inherently variable. In addition, the development of professional skills requires opportunities for practice, feedback and reflection over time. Models that seek to significantly compress PLT risk reducing the depth of engagement with these processes, and may limit the development of professional judgment and capability.

For these reasons, ACAP does not support a reduction in the duration of PLT unless and until it can be demonstrated that equivalent learning outcomes can be achieved through a restructured and more effectively integrated training model. This also raises a broader question as to whether the current volume and structure of the GDLP remain appropriately calibrated. In ACAP's submission, the issue is not simply one of duration, but of how learning is distributed across coursework and workplace experience, and how effectively those components are integrated. A model that is more tightly aligned to clearly defined competencies, and which avoids unnecessary duplication or fragmentation, may allow for greater efficiency without compromising quality. Any reconsideration of duration should therefore be undertaken as part of a broader review of structure, rather than as an isolated measure.

3.2 Embedding Practical Skills in Academic Programs

ACAP supports, in principle, the development of practical skills within academic legal education as part of a broader continuum of professional training. However, it is necessary to recognise that PLT performs a distinct function. It provides a structured, supervised and assessable environment in which practical competencies can be developed in a consistent manner for all graduates.

In ACAP's submission, the issue is not whether practical skills should be introduced earlier, but how those skills are articulated across stages. Any expansion within academic programs should be designed to complement PLT, rather than to replace it. Academic and practical training also serve distinct, though complementary, purposes. Academic programs necessarily address a range of objectives, including doctrinal knowledge and critical thinking, while PLT focuses on the structured development and assessment of applied competencies.

There are, however, practical limits to the extent to which applied competencies can be embedded within academic programs in a consistent and assessable way across all providers. Law degrees

vary significantly in structure, delivery and available resources, and are required to meet a range of academic objectives beyond professional preparation. In this context, an increased reliance on academic programs to deliver practice-based competencies may introduce further variability in outcomes, rather than reduce it.

In ACAP's submission, this reinforces the importance of maintaining a distinct stage of structured, practice-oriented training within the pathway to admission. Embedding practical skills within academic programs should therefore be understood as part of a broader continuum, rather than as a substitute for PLT. A clear articulation of competencies across stages, including the role of PLT in developing supervision-readiness, will be critical to ensuring consistency and clarity in training outcomes.

3.3 Mode of Delivery

The national research suggests that higher levels of satisfaction are associated with more interactive forms of delivery. In ACAP's submission, the critical distinction is not between online and face-to-face delivery, but between passive and active learning design. Skills-based education depends on engagement, iteration and feedback, and these outcomes can be achieved across a range of delivery modes.

In this context, reported preferences for in-person delivery should be understood with some care. Higher satisfaction may reflect the level of interaction and engagement in the learning experience, rather than the mode of delivery itself. Well-designed online and blended models are capable of delivering equivalent outcomes where they incorporate structured interaction, feedback and opportunities for applied learning.

A significant proportion of ACAP's GDLP cohort, approximately 41%, is drawn from regional, rural and remote areas. For these students, participation in programs that require regular in-person attendance may not be feasible due to geographic distance, travel requirements and associated costs. In that context, high-quality online and blended delivery is not simply a matter of preference, but a necessary condition of access.

More intensive or compressed face-to-face delivery models may also have unintended equity impacts. While such models may be suitable for some students, they may be less accessible to those balancing employment, caring responsibilities or financial constraints. The ability to engage with PLT in a flexible and sustained way is an important feature of an inclusive training framework.

Mode of delivery also has implications for consistency in training outcomes. Structured and provider-led delivery models allow for more reliable exposure to core competencies, particularly in circumstances where workplace experience is inherently variable. In this respect, delivery design is closely linked to the broader issue of alignment between responsibility and control within the current framework.

In ACAP's submission, reform in this area should focus on the quality of learning design and the effectiveness of engagement, rather than prescribing particular modes of delivery. Flexibility in delivery should be preserved to ensure that PLT remains accessible, consistent and capable of meeting the needs of a diverse cohort.

3.4 Workplace Experience

Workplace experience is widely regarded as the most valuable component of PLT. At the same time, it is the least consistent. In ACAP's submission, the central issue is not the duration of workplace experience, but the absence of consistent standards governing its delivery and assessment.

The variability in workplace experience is well established. The quality of supervision, the nature of tasks undertaken, and the extent to which students receive meaningful feedback differ significantly across placements. As a result, workplace experience does not operate as a consistent or reliable mechanism for the development of core competencies.

Consideration should be given to how workplace experience is structured, supervised and assessed in practice. At present, expectations are often expressed at a high level, with limited consistency in how they are implemented across different settings. More clearly defined frameworks for supervision, including guidance on the role of the supervisor, the nature of tasks to be undertaken, and the provision of structured feedback, would support greater consistency in outcomes. This would also assist in addressing the current misalignment between responsibility for competency certification and the capacity to influence the quality of workplace learning.

There are also important equity considerations. Access to high-quality placements is not evenly distributed. Students in regional, rural and remote areas, as well as those without access to established professional networks, may face greater difficulty in securing placements that provide meaningful learning opportunities. In this context, increased reliance on workplace experience has the potential to reinforce existing inequalities in access to the profession.

Reform should therefore be directed to improving the consistency and reliability of workplace experience, rather than simply increasing its duration or prominence within the training pathway.

In ACAP's submission, this should include:

- clearly defined expectations regarding the type and range of work to which students are exposed;
- minimum requirements for supervision, including the provision of guidance and structured feedback;
- mechanisms for oversight and quality assurance; and
- appropriate recognition of alternative models of workplace learning, including provider-facilitated and simulated environments, where these can deliver equivalent learning outcomes.

There is also a broader structural risk. Reform proposals that increase reliance on workplace-based learning, without addressing the underlying variability in quality and access, are likely to reproduce the very issues identified in the national research. In ACAP's submission, workplace experience should remain an important component of PLT, but it should operate within a framework that ensures consistency, accountability and equitable access.

3.5 Post-Admission Legal Training (PALT)

ACAP supports, in principle, the development of a structured post-admission legal training framework. However, in ACAP's submission, the role and design of any such model require careful consideration.

PALT should be understood as part of a broader continuum of professional development, building on the foundational competencies established through academic education and PLT. It should not be seen as a substitute for structured pre-admission training, nor as a mechanism for deferring core competency development to the post-admission stage. In this context, there is a direct relationship between the issues identified in the national research and the design of any PALT model. In particular, the variability currently observed in workplace experience highlights the risks associated with relying on employment-based training without consistent standards or oversight.

A PALT framework that relies primarily on workplace-based learning, without clearly defined expectations, minimum standards and mechanisms for accountability, is likely to reproduce the same variability in outcomes that is currently observed in PLT workplace experience. This would have implications not only for training quality, but also for equity and access.

Existing professional development frameworks within the profession also provide a relevant point of reference. Through ACAP's partnership with the Law Institute of Victoria, there is direct visibility of how continuing professional development and early career programs are currently delivered in practice. These initiatives demonstrate that a foundation for post-admission learning already exists. However, they are not presently structured as a cohesive, competency-based extension of PLT. There is an opportunity to strengthen alignment by more clearly linking early career professional development with defined competency progression, supervision expectations and structured learning outcomes consistent with the objectives of PALT.

It is also necessary to consider the capacity of employers to deliver structured training. The ability to provide supervision, feedback and exposure to appropriate work varies significantly across practice settings. Without appropriate support and guidance, there is a risk that responsibility for training will be transferred to employers without the means to deliver it effectively.

In ACAP's submission, any PALT model should include:

- clearly defined competencies to be developed during the post-admission period;
- minimum expectations in relation to supervision, feedback and exposure to legal work;
- mechanisms for oversight and quality assurance; and
- recognition of alternative pathways for achieving required competencies, including structured and provider-supported programs where appropriate.
- alignment with existing professional development requirements and programs, including those delivered in partnership with professional bodies, to support a coherent and continuous training pathway.

Consideration should also be given to how PALT interacts with pre-admission training. In particular, it will be important to ensure that the introduction of a post-admission framework does not result in a reduction in the effectiveness or integrity of PLT or create uncertainty as to the competencies expected at the point of admission.

In ACAP's submission, a well-designed PALT framework has the potential to complement PLT and strengthen the overall training pathway. However, this will depend on ensuring that it is integrated with, rather than substituted for, existing components of the framework, and that it operates within a consistent and quality-assured structure.

4. Coursework and Structured Learning

In ACAP's submission, coursework continues to perform an essential function within the PLT framework. It provides a structured and consistent environment in which core competencies can be developed, practised and assessed across all graduates.

This function is particularly important in the context of variability in workplace experience. While workplace learning can provide valuable exposure to practice, it does not operate as a uniform or reliable mechanism for ensuring that all graduates develop the required competencies. Structured coursework therefore serves as a critical point of consistency within the training pathway. The concerns identified in the national research in relation to coursework should be understood in this context. Dissatisfaction appears to be directed primarily to the design and delivery of coursework, particularly where it is perceived as duplicative of academic study or insufficiently connected to practice.

There is also a broader question as to whether the current PLT competency framework fully reflects the contemporary demands of legal practice. While the existing framework has provided a stable foundation, aspects of its structure reflect an earlier conception of practice. Reform provides an opportunity to simplify and clarify the articulation of core skills and knowledge, including through more coherent categorisation of competencies, to support consistency in delivery and assessment across providers.

At the same time, there is scope to ensure that the framework more explicitly reflects emerging areas of professional capability. In particular, competencies relating to cultural competency, technological capability and digital legal practice are not always consistently embedded within structured learning. Strengthening the visibility of these areas within the competency framework would assist in ensuring that graduates are better prepared for the realities of contemporary legal practice.

In ACAP's submission, these concerns do not point to any redundancy in structured learning. Rather, they highlight the need to strengthen how coursework is designed and delivered to ensure it remains current, relevant and aligned with contemporary legal practice. In this context, it is important to distinguish between duplication and application. Coursework in PLT is not intended to replicate academic content, but to provide opportunities to apply legal knowledge in a practical context, develop professional skills, and receive structured feedback.

Well-designed coursework plays a central role in preparing graduates for supervised practice. It allows for the development of foundational skills in a controlled environment, where students can engage in simulated or structured tasks, receive feedback, and refine their approach before entering or progressing within a workplace setting.

In ACAP's submission, reform in this area should focus on enhancing the practical orientation, integration and engagement of coursework, rather than reducing its role within the PLT framework.

This includes:

- strengthening the alignment between academic knowledge and practical application;
- increasing opportunities for interactive, skills-based learning and feedback; and
- ensuring that coursework is clearly connected to the competencies required for supervised legal practice.

Reducing or removing coursework, or significantly diminishing its role, would increase reliance on workplace-based learning and exacerbate existing variability in training outcomes. In ACAP's submission, structured learning remains a necessary and integral component of a consistent and effective pathway to admission.

In this context, concerns regarding the "volume of learning" associated with the GDLP should be understood as issues of structure and alignment rather than excess in principle. Where coursework is not clearly integrated with practice, or where competencies are framed in a way that does not reflect contemporary professional requirements, the program may be perceived as unnecessarily extended or "padded". A more streamlined and integrated model, focused on clearly defined and current competencies, would better support both educational outcomes and perceptions of value.

5. The Proper Role of PLT: Supervision-Readiness

A recurring issue identified in the national research is the perception that PLT does not produce "practice-ready" lawyers. In ACAP's submission, that perception reflects a lack of clarity as to the role of PLT within the pathway to admission. The expectation that pre-admission training should produce fully "practice-ready" graduates does not reflect the way professional competence is developed in practice.

As Kift and Nakano (2021) observe in their analysis of the Australian legal education framework, the concept of "practice-readiness" is not clearly or consistently defined across the profession. They note that a number of the capabilities associated with effective legal practice, particularly those involving professional judgment, ethical decision-making and client interaction, are more appropriately developed within supervised practice rather than prior to admission.¹

These observations are consistent with the findings of the national research and support a more calibrated understanding of the role of PLT. In ACAP's submission, PLT should not be assessed against a standard of full professional competence at the point of admission. Rather, the appropriate standard is one of supervision-readiness, that is, whether a graduate is equipped to engage effectively in supervised legal practice.

A graduate who meets this standard is able to:

- undertake legal tasks at a foundational level;
- exercise entry-level professional and ethical judgment;
- respond appropriately to guidance, feedback and supervision in a practice environment; and
- engage in ongoing learning within a structured professional context.

¹ Kift S and Nakano M, Rethinking the First Year of Legal Practice (2021)

On this view, PLT performs a distinct and necessary function within a broader continuum of professional development. It establishes foundational competence in a structured and assessable environment, while supervised practice provides the context in which those competencies are consolidated, extended and applied.

This has implications for the competency framework. The current framework has provided a stable foundation for PLT. However, its level of detail and structure can make it difficult to apply flexibly across different delivery models and practice contexts, and may not clearly distinguish between competencies expected at the point of admission and those developed through practice.

In ACAP's submission, there is scope to simplify and modernise the framework so that it more clearly distinguishes between competencies to be achieved prior to admission and those to be developed through supervised practice. A more principles-based, stage-oriented approach would better align with a continuum model of professional development while maintaining appropriate standards.

6. Equity, Access and Inclusion

Issues of equity and access also arise in relation to the financial structure of PLT and the way training pathways are supported. These factors have a direct impact not only on who is able to undertake and complete PLT, but also on broader participation in, and access to, the legal profession.

Unpaid or underpaid workplace experience, and reliance on informal networks to secure placements, can create barriers that do not operate evenly across the student cohort. These factors may disproportionately affect those without established professional connections or the financial capacity to absorb periods of limited or no income, with flow-on implications for diversity within the profession.

As noted at paragraph 3.3, a significant proportion of our students are located in regional, rural and remote areas. Requirements that assume proximity to metropolitan centres, including the need to relocate or travel to access placements or training opportunities, can therefore operate as a practical barrier to entry. In this respect, geographic location functions as a proxy for access, not only to training pathways, but ultimately to participation in the profession itself. This has broader access to justice implications, as barriers to entry may contribute to ongoing workforce shortages in regional and rural communities.

Consideration should therefore be given to the role of income-contingent loan schemes, including FEE-HELP, in supporting access to PLT. For many students, access to such funding is critical to participation and progression.

In this context, it is important that PLT continues to be delivered within a coherent higher education framework. The GDLP, as an AQF Level 8 qualification, provides a structured, quality-assured and nationally recognised mechanism for training and assessment. This supports consistency across providers and helps ensure continued eligibility for student loan schemes that are central to equitable access.

Any reform should preserve these features to avoid creating unintended barriers to entry, limiting participation, or undermining the accessibility of the training pathway.

7. Value for Money and Sustainability

The level of dissatisfaction expressed in the national research in relation to value for money is significant and warrants careful consideration. In ACAP's submission, that dissatisfaction appears to be driven primarily by perceptions regarding the design and practical relevance of coursework, rather than by the existence of structured training as such.

Where coursework is perceived as duplicative of academic study or insufficiently connected to practice, concerns regarding value are likely to arise. Addressing those concerns requires improvements in design and delivery, rather than a reduction in the role or duration of PLT.

It is also necessary to recognise that PLT is delivered within a regulated framework that imposes minimum requirements in relation to curriculum, assessment and supervision. The cost of delivery reflects those requirements, including the need for appropriately qualified staff, structured assessment, and quality assurance processes.

Reform proposals that increase expectations in relation to workplace oversight, assessment or curriculum design will necessarily increase the cost of delivery. If those costs are not addressed, there is a real risk that provider capacity will be reduced, competition will be limited, and access to PLT will be constrained.

In ACAP's submission, concerns regarding value should be addressed through improvements in the design and delivery of training, rather than through reductions in scope or duration alone.

8. Implementation

ACAP considers that the implementation of any significant reform will require careful planning and sequencing. The components of the current framework are interdependent, and changes to one element will have consequences for others. This includes law degree design, PLT delivery, workplace experience and any post-admission requirements.

Reform should also be approached as a staged process. Changes to curriculum design, delivery models, workplace requirements and post-admission training should not be introduced simultaneously without sufficient testing and evaluation. In particular, reforms that increase reliance on workplace-based learning should not proceed without first establishing consistent standards, appropriate supervision requirements and mechanisms for oversight. There is a risk that partial or uncoordinated reform may exacerbate existing issues. For example, reducing the duration or scope of PLT without addressing variability in workplace experience may lead to less consistent training outcomes. Similarly, introducing post-admission training without clear expectations and support structures may reproduce existing inconsistencies in supervision and learning.

Appropriate transitional arrangements will also be necessary to ensure that students are not disadvantaged during the implementation period. This includes providing clarity for current and prospective students, maintaining stability in existing programs, and allowing sufficient time for providers, employers and regulators to adapt to new requirements.

In ACAP's submission, a coordinated, staged and evidence-based approach to implementation will be critical to ensuring that reform improves the effectiveness, consistency and accessibility of the training pathway, without undermining existing strengths within the system.

9. Recommendations

For the reasons set out above, ACAP recommends that reform be directed to the following priorities.

A. Clarifying the Role of PLT within a Training Continuum

1. Clarify the role of PLT as a distinct and necessary stage within a continuum of professional development spanning academic education, PLT and supervised practice.
2. Adopt *supervision-readiness*, rather than full "practice-readiness", as the appropriate standard for admission.

B. Strengthening Consistency and Alignment in Training Outcomes

3. Align responsibility for competency outcomes with the capacity to influence and assure those outcomes.
4. Introduce national minimum standards for workplace experience, including expectations in relation to supervision, exposure to legal work and the provision of structured feedback.
5. Ensure that any increased reliance on workplace-based learning is accompanied by appropriate oversight, quality assurance and support mechanisms.

C. Maintaining and Enhancing Structured Learning

6. Retain structured coursework as a core component of PLT, recognising its role in providing consistent and assessable development of competencies across all graduates.
7. Strengthen the design and delivery of coursework to improve integration with academic learning and enhance practical application and engagement.

D. Preserving Access, Flexibility and Equity

8. Preserve flexibility in delivery, including online and blended models, to ensure that PLT remains accessible to students from diverse geographic and socioeconomic backgrounds.
9. Ensure that pathways to workplace experience do not depend solely on access to metropolitan-based opportunities, and recognise alternative models of training, including provider-supported and simulated environments.
10. Maintain access to income-contingent loan schemes, including FEE-HELP, as a critical mechanism for supporting participation in PLT.

E. Ensuring Careful and Coordinated Reform Implementation

11. Approach any reduction in the duration of PLT with caution, and only where it can be demonstrated that equivalent learning outcomes will be achieved.
12. Develop any post-admission legal training framework (PALT) with clearly defined competencies, minimum supervision standards and appropriate mechanisms for oversight and accountability.

13. Implement reform in a staged and coordinated manner, recognising the interdependence of law degrees, PLT, workplace experience and post-admission training.

10. Conclusion

The national review presents an important opportunity to strengthen the effectiveness, coherence and accessibility of the pathway to admission. In ACAP's submission, the findings of the national research do not support the conclusion that PLT, as a distinct stage of training, is unnecessary. Rather, they point to issues of alignment, articulation and consistency within the existing framework.

PLT continues to perform a necessary function within a broader continuum of legal education and professional development. It provides a structured and assessable environment in which foundational competencies can be developed in a consistent way for all graduates. That function is particularly important in a system where other components of training, including workplace experience, are inherently variable. Reform should therefore be directed to improving the integration of academic education, PLT and supervised practice, rather than removing or diminishing any one component. This includes clarifying the role of PLT, strengthening the design and delivery of coursework, introducing greater consistency in workplace experience, and ensuring that responsibility for outcomes is aligned with the capacity to influence them.

It is also important that reform maintains a focus on equity, access and sustainability. Flexible delivery, supported pathways to workplace experience, and the preservation of nationally consistent standards will be critical to ensuring that the profession remains accessible to a diverse cohort of graduates.

Finally, ACAP emphasises the importance of careful implementation. The components of the current framework are interdependent, and changes to one element will have consequences for others. Reform should therefore be undertaken in a staged and coordinated manner, with appropriate transitional arrangements and opportunities for evaluation.

In ACAP's submission, a measured, integrated and staged approach to reform will provide the most effective means of addressing the concerns identified in the national research, while maintaining the integrity and accessibility of the pathway to admission.

Yours sincerely,



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Feedback Form: Review of practical legal training

Respondent details

Name: Desi Vlahos

Organisation (if applicable): ACAP University College

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Are you responding as (select one):

- ☐ Individual
- ☒ Organisation
- ☐ Peak body / Representative group
- ☐ Other (please specify): _____

Jurisdiction (select one)

- ☐ National
- ☐ Australian Capital Territory
- ☒ New South Wales
- ☐ Northern Territory
- ☐ Queensland
- ☐ South Australia
- ☐ Tasmania
- ☒ Victoria
- ☐ Western Australia
- ☐ Multiple
- ☐ Other. Please specify:

Your submission will be shared with the Admissions Committee and the Law Admissions Consultative Committee and may also be shared with the Legal Services Council.

Unless stakeholders advise us otherwise, submissions may be published on the Council's website.

May we publish your response on the Legal Services Council's website (select one)?

- ☒ Yes
- ☐ No

Responses to consultation questions

Law courses	
1.1	Do you support the proposal for the LACC to amend the Accreditation Standards for Australian Law Courses to require law courses to demonstrate how they have included practical teaching and training of the practical skills identified at Appendix F, with appropriate assessment? ACAP supports the proposal in principle. Greater integration of practical skills within law degrees is appropriate and may assist in addressing perceived duplication between academic study and PLT. However, care must be taken to ensure that the introduction of such requirements does not result in an erosion of doctrinal depth or create unrealistic expectations as to the role of academic legal education. Practical skills development within law courses should complement, rather than replace, the distinct function of PLT.
1.2	Do you suggest any amendments to the proposed skills schedule (Appendix F) in respect of the knowledge areas and skills to be included in the delivery of law courses, as identified in column three of the table? ACAP supports the development of a skills schedule but emphasises the need for clarity as to the level at which each skill is expected to be attained at the academic stage. In particular, the schedule should distinguish between: • foundational exposure at university; • applied competency at the PLT stage; and • advanced capability developed during supervised practice. Absent this differentiation, there is a risk of duplication and misalignment across the training continuum.
1.3	Would law schools be able to implement these changes by the beginning of the 2028 academic year, as proposed? As a PLT provider, we are not in a position to comment definitively on this matter. However, implementation by the start of the 2028 academic year would only be feasible if: • sufficient lead time is provided for curriculum redesign; • alignment with accreditation cycles can be achieved; • the final requirements are clearly defined in a timely manner; and • adequate resourcing and institutional support are in place. Consideration should also be given to transitional arrangements to ensure quality is maintained throughout implementation.
Reform of PLT – Practical knowledge and skills	

2.1	Do you support the proposal to amend the PLT Competency Standards to reflect the categories and skills set out in the skills schedule at Appendix F as the practical knowledge and skills required at the time of admission? ACAP supports alignment between PLT Competency Standards and the proposed skills schedule. However, it is critical that the standards reflect the appropriate level of competence at the point of admission. In ACAP's submission, PLT should prepare graduates to be ready to engage effectively in supervised practice, rather than to operate as fully independent practitioners.
2.2	Do you suggest any amendments to the categories or skills set out in the skills schedule at Appendix F? ACAP reiterates the importance of clearly distinguishing the level of proficiency expected at each stage of training. The skills schedule should avoid assuming that complex or context-dependent competencies can be fully developed prior to admission.
2.3	Do you think that the following areas need to be specifically included in the skills schedule, either as categories or identified knowledge and skills: i. Working with clients from culturally and linguistically diverse backgrounds? ii. Preventing and addressing sexual harassment? iii. Awareness of obligations under anti-money laundering/counter-terrorism financing regulations? iv. Awareness of ADR options, or specific skills relating to ADR? v. Negotiation skills in a wider range of settings, or other specific settings? vi. Drafting any other types of legal documents? If so, what types of documents? ACAP supports inclusion of the identified areas. In particular: • cultural competency and working with diverse clients are essential to modern legal practice; • awareness of sexual harassment and professional conduct obligations is critical; • understanding of AML/CTF obligations reflects evolving regulatory requirements; and • ADR and negotiation skills should be included as core competencies. Care should be taken to ensure that the inclusion of additional areas does not result in an overloading of PLT beyond its proper scope.
2.4	Should the option for graduates to undertake Supervised Workplace Training as a way of completing PLT be retained? ACAP supports retaining the option of Supervised Workplace Training.

	Workplace experience is a valuable component of training, provided it is appropriately structured and supervised.
2.5	If the option of Supervised Workplace Training is to be retained, what aspects of the skills schedule should be delivered by an approved provider or as approved programmed training? ACAP considers that core competencies, particularly those requiring consistent assessment (such as drafting, ethical decision-making and professional responsibility), should be delivered through structured provider-led training. Workplace training should complement, rather than replace, these components.
2.6	Should there be any other amendments to Supervised Workplace Training? ACAP supports amendments to improve the quality and consistency of Supervised Workplace Training. In particular: • minimum standards for supervision and task exposure should be established; and • mechanisms for provider oversight should be strengthened.
Reform of PLT – Delivery of PLT	
3.1	Do you support the proposal for the LACC to amend the PLT Standards to reduce PLT courses to be a minimum of four weeks in length, together with up to one week of pre-reading and viewing of preparatory materials? ACAP does not support reducing PLT courses to a minimum of four weeks. The issues identified in the national research relate primarily to quality and design, rather than duration. A reduction in duration risks limiting opportunities for structured skills development and assessment.
3.2	Do you think that a four-week period is too short or too long for a PLT course, taking into account the other proposals in relation to law courses and post admission training? A four-week period is insufficient to achieve the intended outcomes of PLT, particularly in light of the variability of workplace experience. Duration should be determined by reference to the competencies to be achieved, rather than reduced as a standalone reform measure.
4.1	Do you support the proposal for the LACC to amend the PLT Standards to provide that a PLT course may be, but does not have to be, delivered at a graduate diploma level or equivalent? ACAP supports flexibility in delivery models, including the removal of a strict requirement for graduate diploma level delivery. However, this should be accompanied by robust and consistent quality assurance mechanisms.

4.2	If you support this proposal, would any additional safeguards be required for PLT providers (given they would not necessarily be regulated by TEQSA)? For example, should new quality assurance measures be required in the LACC framework documents? What should those additional measures be? If non-TEQSA providers are permitted, additional safeguards should include: • clear accreditation standards; • external quality assurance processes; and • oversight of assessment integrity. Consistency of outcomes should be prioritised across all providers.
5.1	Do you support the proposal that the LACC amends the PLT Standards to require that PLT coursework is to be delivered in person or, in exceptional cases (as determined by the PLT provider), by synchronous online delivery? ACAP does not support mandating in-person delivery as the primary mode. The quality of learning is determined by pedagogical design and engagement, rather than modality. High-quality, interactive online delivery is essential to ensuring accessibility and equity particularly for regional, rural and remote students and can achieve equivalent outcomes.
6.1	Do you support a review of the PLT Standards to ensure that assessments are rigorous in measuring whether students have developed the required knowledge and skills? If so, do you have any suggestions on how the Standards should be set to ensure rigorous and effective assessment? ACAP supports a review of PLT Standards to ensure rigorous assessment. Standards should require: • assessment aligned to real legal tasks; • demonstration of applied competence; and • meaningful feedback processes.
6.2	Do you think that there is a need for the LACC to amend the PLT Standards to provide guidance on how incidents of academic misconduct should be recorded and reported to the admitting authorities in student conduct reports? ACAP supports the provision of clearer guidance on the recording and reporting of academic misconduct. Consistency and transparency in reporting are important to maintaining professional standards.
Workplace experience	
7.1	Do you support the LACC retaining the requirement for a minimum of 15 days of workplace experience prior to admission? ACAP supports retaining a workplace experience requirement but considers that quality is more significant than duration.
8.1	Do you support the LACC updating the Standards on PLT Workplace Experience to provide more information on the types of tasks and hours allocated to the development of specific skills for students completing their workplace

	experience, with regard to the skills schedule at Appendix F? Do you have any suggestions on what this guidance should include? ACAP supports updating the Standards to provide greater guidance on workplace experience. Guidance should address: • the nature of tasks to be undertaken; • allocation of time to skill development; and • expectations of supervision.
9.1	Do you support the LACC working with stakeholders to prepare guidance for supervisors on the supervision of workplace experience that addresses the purpose and requirements of workplace experience, the type of tasks to be undertaken and time allocated to them and the ethical standards and expectation of supervisors? ACAP supports the development of guidance for supervisors. Clear expectations regarding supervision, feedback and ethical responsibilities would improve the quality of workplace experience.
10.1	Do you think that legal profession regulators should review the training that is offered to lawyers who wish to improve their supervisory skills? ACAP supports a review of training available to supervisors.
10.2	Do you think that there is a need for additional training for lawyers who wish to improve their supervisory skills? What do you think that training should include? How could it be delivered? There is a need for additional training. This should include: • effective supervision practices; • provision of feedback; • ethical and professional responsibilities; and • supporting early career development.
11.1	Do you support the LACC amending the Standards and the Standards for PLT Workplace Experience to allow a PLT provider to approve workplace experience being undertaken while the student is studying a law course? If so, should any additional safeguards or requirements be imposed on such work experience? Should PLT providers play the role of certifying that appropriate work experience has been undertaken? ACAP supports allowing workplace experience to be undertaken during a law course, subject to safeguards. PLT providers should retain a role in approving and certifying the quality of such experience.
12.1	Do you support the LACC amending the PLT Standards to set out the obligations of PLT providers to assist students in sourcing workplace experience opportunities?

	ACAP supports requiring providers to assist students in sourcing workplace experience, but notes that responsibility must be shared across the profession.
Post Admission Legal Training (PALT)	
13.1	Do you support a new requirement being imposed for early career lawyers to undertake 15 hours of PALT in each of the first two years of practice? Is the amount of time proposed for PALT too long or too short? ACAP supports the introduction of PALT in principle. A continuum-based approach to professional development is appropriate, and many competencies are more effectively developed during supervised practice.
13.2	Do you think it is appropriate for this requirement be implemented as a condition on practising certificates? If not, please outline what you consider to be the preferable mechanism to impose the new requirement. Implementation as a condition on practising certificates may be appropriate, subject to proportionality and administrative feasibility.
14.1	Do you support the proposal for lawyers who practise exclusively as barristers to be exempt from the requirement to undertake PALT? Would this pose any issues in your jurisdiction? ACAP supports the proposed exemption for barristers.
15.1	Do you support the proposal that PALT should be delivered in areas identified and developed by PALT providers, subject to the approval mechanisms set out separately below? ACAP supports PALT being delivered by approved providers, subject to appropriate regulatory oversight.
15.2	Do you support the idea that lawyers can choose to undertake PALT in one practice area, or up to four different practice areas? ACAP supports flexibility in practice areas.
16.1	Do you support the proposal that lawyers who are undertaking PALT should have further restrictions on their ability to practise? If so, what additional restrictions should apply? ACAP does not consider additional restrictions on practice to be necessary, provided appropriate supervision requirements are in place.
Delivery of PALT	
17.1	Do you support the proposal that PALT should be delivered in person or, in exceptional circumstances (as determined by the PALT provider), by synchronous online delivery?

	ACAP does not support restricting delivery to in-person formats. Flexibility in delivery is essential to access and participation.
18.1	Do you support the proposal that the content and providers of PALT should be approved by the regulator that issues practising certificates to solicitors? ACAP supports regulatory oversight of PALT providers and content.
19.1	Do you support the proposal that PALT should incorporate rigorous assessment? Do you have any views on the parameters for this requirement? ACAP supports the inclusion of appropriate assessment, provided it is proportionate and aligned to the objectives of PALT.
Clinical legal education	
20.1	Do you support the Committees considering options for the inclusion of clinical legal education as a component of PLT? ACAP supports consideration of clinical legal education within PLT.
20.2	If introduced, should clinical legal education be a mandatory component of PLT or an optional extra for students to undertake? If clinical legal education is a mandatory component of PLT, should students be entitled to credit for clinical legal education undertaken as part of a law degree Clinical legal education should be an optional component, with appropriate recognition where undertaken during a law degree.
20.3	If clinical legal education is optional, should completion of clinical legal education satisfy the requirements for PALT? Where appropriate, clinical legal education may contribute to PALT requirements.
20.4	Who should be responsible for delivering and supervising clinical legal education? Responsibility should be shared between universities, PLT providers and approved organisations, subject to appropriate standards.
20.5	Do you support the Committees inviting a working group comprising suitably qualified educators/experts to explore how clinical models of legal education could be employed as part of PLT? ACAP supports the establishment of a working group.
Supervision of early career lawyers	
21.1	Do you think there is a need for additional guidance to supervisors of early career lawyers, to improve supervision? ACAP supports the development of additional guidance for supervisors.

21.2	Do you support legal profession regulators establishing a working group to develop additional guidance and resources for supervisors of lawyers as part of their supervised legal practice and consider potential regulatory reforms? ACAP supports the establishment of a working group to consider supervisory standards and resources.
Implementation timing	
22.1	Do you support the proposed transitional arrangements and implementation timeframe set out at Proposal 22? ACAP supports transitional arrangements and staged implementation. Sufficient time must be allowed to ensure that reforms are implemented effectively and without compromising quality.