

1 June 2026

The Hon Justice Francois Kunc
Chair, Legal Services Council Admissions Committee
Chair, Law Admissions Consultative Committee
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Dear Justice Kunc

Consultation on practical legal training

The Law Council of Australia welcomes the opportunity to provide a submission to the Admissions Committee of the Legal Services Council and the Law Admissions Consultative Committee in response to the Review of Practical Legal Training and accompanying Consultation Paper.

I am pleased to **enclose** the Law Council's submission. Thank you for your patience in receiving it.

If you would like to discuss this submission, please contact John Farrell, Executive Policy Lawyer, on [REDACTED] or at [REDACTED]

Yours sincerely



Tania Wolff
President



Consultation on practical legal training

**Legal Services Council Admissions Committee and
Law Admissions Consultative Committee**

1 June 2026

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- the Queensland Law Society;
- the Law Society of South Australia;
- the Law Society of Tasmania;
- the Law Institute of Victoria;
- the Law Society of Western Australia;
- Law Society Northern Territory
- Law Firms Australia;
- the Legal Education Working Group;
- the Rural, Regional and Remote Committee; and
- the Young Lawyers' Committee,

for their contribution to the preparation of this submission.

Executive summary

1. The Law Council of Australia welcomes the opportunity to provide a submission to the Admissions Committee of the Legal Services Council and the Law Admissions Consultative Committee (together, **the Committees**) in response to the Review of Practical Legal Training (**PLT**) and accompanying Consultation Paper.
2. Australia's PLT system has a documented problem. More than half of graduates are dissatisfied with their PLT experience; more than 70 per cent find it poor value for money.¹ The Law Council supports substantive reform and welcomes this consultation as an important step toward it.
3. The Law Council acknowledges the extensive work that has been undertaken by the Committees, and before that by the NSW Legal Practitioners Admissions Board (**LPAB**), developing a set of proposals for possible reform. This work has been invaluable in energising important discussions about the design, delivery and regulation of PLT and broader legal education.
4. The Law Council acknowledges that the views of the legal profession on the need for reform are varied. However, the national survey feedback demonstrates that:²
 - (a) many graduates and supervisors have expressed dissatisfaction with PLT—although there are differing views as to whether this lies in dissatisfaction with the broad design of the current PLT model or with failures in executing the delivery of that model;
 - (b) many graduates are dissatisfied with the cost of some PLT programs and consider that these programs are not providing sufficient value for money; and
 - (c) there are significantly variable experiences of PLT depending on which program is undertaken.
5. The Law Council supports reforms to practical training that improve quality, strengthen ethical competence, and better align with contemporary legal practice, while maintaining accessibility to admission and protecting consumers of legal services.
6. The Law Council's approach to this submission is guided by five principles, which we believe also represent the interests of the profession and the public.:
 - (a) Reform should be focused on ensuring that newly admitted lawyers are competent, ethical, and prepared to commence supervised practice in a manner that protects clients and sustained public confidence in the legal profession (and in turn, the law itself). Consumer protection must remain the foundational purpose of admission and early professional training.

¹ Urbis, for the Legal Services Council on behalf of the Admissions Committee and the Law Admissions Consultative Committee, [National Practical Legal Training Research](#) (Survey Research Report, March 2026).

² Ibid.

- (b) Broad national consistency is necessary to uphold the integrity of the national legal profession, facilitate mobility of graduates and lawyers, and ensure equitable access to justice regardless of geographic location. Without a broadly consistent approach to PLT, disparities in training quality, regulatory expectations, and admission criteria may emerge, undermining the goal of a coherent and nationally recognised legal profession.
 - (c) It is a time of significant disruption in the legal profession driven by factors including the accelerating adoption of artificial intelligence (**AI**) technology, increasing business costs and new regulatory requirements, particularly under anti-money laundering and counter-terrorism (**AML-CTF**) reforms. Reform proposals should take careful account of these developments and any impact that they might have on the viability of legal practices.
 - (d) A sustainable legal profession is essential to upholding the rule of law and ensuring access to justice. If the next generations of emerging lawyers cannot obtain work, the human cost falls on access to justice, not just the profession. It is therefore imperative that we avoid reform to the legal education system which has the inadvertent impact of reducing pathways into the legal profession, including by deterring small firms from hiring and training graduates.
 - (e) Substantial reform must be underpinned by a reform process that is structured, evidence-led and guided by genuine national consultation with all stakeholders. With the best will in the world, the implementation of the reforms by 2028 will not be achievable as additional time for careful consideration of potential reforms is required. The Law Council is keen to work with the Committees to facilitate this process in a way that maintains a sense of urgency including by supporting a national conference later in 2026.
7. The Law Council's views on the proposals outlined in the Consultation Paper are summarised broadly below:
- (a) The Law Council supports, in principle, better integration of practical skills into university law courses. However, based on the feedback we have received, this must be carefully designed to preserve and improve educational integrity, reflect resourcing limitations and current dynamics within the university and legal sectors, and maintain a distinct PLT stage (although not necessarily the current timeframe) before admission.
 - (b) We agree that a redesign of the skills/competency framework should be undertaken. While the proposed skills schedule is preferable to the current framework, we suggest that a comparative national review of the alternative models be undertaken to provide further improvement. We need to understand properly what issue we are solving for.
 - (c) The Law Council supports, in principle, incorporating greater minimum requirements for face-to-face in-person teaching as part of PLT and post-admission legal training (**PALT**). Education and assessment in an in-person environment is often preferable for the development of practical knowledge and skills; interpersonal and communication skills; professional networks; and professional culture. However, we should ensure that preferred delivery models

do not inadvertently exclude capable candidates or undermine equitable access to the profession.

- (d) The proposals to shorten PLT course duration and work experience requirements require a more substantive consultation process to ensure that costs are reduced rather than shifted, courses are subject to appropriate oversight, and changes are modelled to provide the optimum timeframe required to develop the required competencies. In our view, post-admission training should extend and consolidate competence, not compensate for reduced pre-admission formation.
8. The Law Council generally supports clinical legal education as a means of strengthening the connection between legal theory, practical skills, ethics, and professional identity formation. However, effective clinical legal education is resource-intensive and cannot simply be expanded without significant institutional cost and investment. Therefore, while the proposal to include clinical legal education as a component of PLT has merit, it should be the subject of significant further analysis.
- (a) Clearer guidance and more structured standards for workplace experience and supervised practice are vital.
 - (b) Quality supervision of early career lawyers is a critical component of professional development and contributes to positive outcomes for practitioners, their employers and the public. The processes and analysis undertaken to date have indicated that supervision is an area of the legal education continuum that requires significant improvement to ensure consistency and quality of experience. The Law Council is keen to be a part of the proposed working group to develop consistent standards and structure.
9. The Law Council and its constituent bodies welcome further dialogue with the Committees on potential reforms to the legal education continuum. These reforms are necessary, complicated and involve many stakeholders. Given the importance of these reforms for the entire legal profession, we look forward to assisting the Committees in ensuring that any changes implemented meet the needs of the profession and the public into the future.

Overarching comments

The case for exploring reform to PLT

10. Australia's independent legal profession underpins the economic, political and social foundations of our country. This independent legal profession is vital to upholding the rule of law, protecting human rights, and ensuring fair and impartial justice. Australia's legal education continuum, from university through to practice, must support early career lawyers to fulfil this vital function.
11. As will be well-known to the members of the Committees, it is a time of significant disruption in the legal profession. This disruption is being driven by factors including the accelerating adoption of AI technology, increasing business costs (including significant practice costs relating to implementation of the AML/CTF regime) and new as well as ongoing regulatory requirements.
12. Over the course of a number of years, the Law Council and its constituent bodies have been engaging extensively with the legal profession to address these challenges and ensure that the profession is planning for the workforce realities of the future while upholding the core principles that underpin the profession.
13. Through these discussions, a broad consensus has emerged that a key challenge is ensuring that graduates and early career lawyers are 'practice-ready'. We have identified growing concerns about the ability of the current legal education model, across the continuum, to adequately develop the level skill, knowledge and understanding that should be expected of those entering the profession.
14. The Queensland Law Society in its report *The job readiness of law graduates and entry level solicitors (QLS Report)*, describes 'job readiness' or 'practice readiness' as:

... the minimal qualifications and expertise for entry into a specific occupation or profession. Job readiness as a concept is multi-dimensional. It can be defined as 'the ability to be employed', and as the capacity to manage an immediate work environment with resilience and adaptability. Other definitions point to job readiness as the probability of an individual being and staying employed.³
15. In the context of the legal profession, practice readiness is about ensuring that law graduates and newly admitted lawyers possess an adequate level of skill and knowledge, in a supervised context, to meet the needs of their employers, the courts and, importantly, their clients.
16. There is concern within the profession that Australian pre-admission legal education does not sufficiently connect academic or theory-based education and training with practical lawyer-focused training. Competencies often identified as lacking include foundational understanding of substantive law areas, technical and practical skills (e.g. problem-solving, written and oral communication skills, client management,

³ Francina Cantatore, Tanya Atwill, Rachael Field, Bond University for the Queensland Law Society, [The job readiness of law graduates and entry level solicitors](#) (1 December 2022).

practice development), understanding of ethics and professional regulation, and technological skills.

17. Ultimately, if new practitioners do not possess adequate training to meet the needs of their employers, clients and the courts, confidence in the profession suffers along with the service provided to the community. Career longevity and satisfaction of junior practitioners is also affected, contributing to attrition from the profession and exacerbating staff retention issues for law practices and impacting the availability of access to legal assistance.
18. When PLT works effectively, emerging lawyers are properly equipped with the practical knowledge and skills that transition them from academic university study to active, well-supported professional life in the practice of law. Legal education in Australia, and any reforms proposed to the system, must focus on meeting the primary objective of the protection of the public by ensuring practitioners are sufficiently ready for admission and in a position to fulfil their vital functions as members of the legal profession.
19. While we acknowledge that the views of the legal profession on the current design, delivery and regulation of PLT are varied, particular dissatisfaction has been raised with the Law Council about:
 - the significant cost of some PLT programs;
 - the usefulness of some of the content of these programs;
 - whether these programs are providing sufficient value;
 - a perceived lack of academic rigour;
 - a lack of relevance to practice; and
 - variable experiences of online delivery models and workplace components.
20. We recognise that this broad dissatisfaction has also been identified in the New South Wales (**NSW**) survey of practitioners commissioned by the LPAB,⁴ and in the subsequent national survey conducted by the Committees.⁵
21. We note, for example, the following findings of the national survey:
 - more than half of graduate lawyers reported dissatisfaction with their experience of PLT;
 - more than 70 per cent of graduates were dissatisfied with the value for money of PLT;
 - approximately two-thirds of supervising lawyers disagreed that PLT was useful in supporting the legal profession to appropriately train early career lawyers;
 - about half the graduates surveyed were dissatisfied with the structure and content of PLT coursework;
 - graduates who undertook PLT coursework in-person consistently had much higher net satisfaction with their PLT experience than those who did coursework in a hybrid or online-only format; and

⁴ Urbis, for the Legal Profession Admission Board of New South Wales, [Legal Profession's Experience of Practical Legal Training](#) (9 April 2025).

⁵ Urbis, for the Legal Services Council on behalf of the Admissions Committee and the Law Admissions Consultative Committee, [National Practical Legal Training Research](#) (Survey Research Report, March 2026).

- graduates reported a need for exposure to practical legal experience earlier in their studies.⁶

22. On the basis of the above, we agree that it is timely and appropriate to consider potential reforms to the design, delivery and regulation of PLT. The reforms should ensure that PLT is adapted to meet contemporary needs and community expectations.

The model proposed

23. We recognise that the Committees have largely sought to mirror the model proposed by the LPAB in an effort to ensure that the two processes move with some consistency and expediency. Both the Committees and the LPAB propose a re-designed education continuum involving:

- greater integration of practical skills within university law degrees;
- a PLT component comprising a significantly shorter (four week) and predominantly face-to-face coursework and a 15-day verified supervised work experience placement;
- a PALT component undertaken in the first two years of practice and delivered in-person with assessment; and
- a reconsideration of the supervision framework for all early career lawyers.

24. While this national process, and the one established by the LPAB in NSW, initially sought to reconsider PLT as a distinct stage of the legal education continuum, it is clear from the proposals put forward that we are, in fact, examining the design of components throughout the entire continuum, and reconsidering how 'practical training' can be embedded or improved throughout that continuum. This is acknowledged by the LPAB in its Interim Report on PLT Reform (**LPAB Interim Report**):

This model treats legal education as a continuum, which commences with practical training embedded in law degrees, is reinforced in post-degree practical legal training (PLT) and continues in post-admission legal training (PALT). Our preferred model thus integrates three stages of practical legal training by connecting legal studies with post admission training and with enhanced practical training in the early years of practice. By contrast, the present framework is concerned only with pre-admission PLT offerings which are disconnected from law degrees and post-admission training.⁷

25. The Law Council is grateful for the work of the Committees in putting this important discussion on the national agenda. We also acknowledge the significant contribution of the LPAB and recognise the process undertaken to engage with stakeholders (primarily) in NSW throughout the course of 2025.

26. While that work is extremely valuable, we consider that adopting the proposals as the template for national reform risks substituting a single jurisdictional review for the deliberative national process required for reform of this scale to the national

⁶ Ibid.

⁷ Legal Profession Admission Board of New South Wales, [Interim Report on PLT Reform](#) (13 March 2026) 6.

profession. There are jurisdictional differences and issues that require proper consideration as a part of a sustainable and effective national educational framework. Many of these issues are discussed further below.

27. Such a substantial reform must be underpinned by a reform process that is structured, evidence-led and guided by genuine national consultation with all stakeholders that contribute to shaping new lawyers across the legal education continuum.
28. A genuine national reform process should include comparative analysis, piloting, and stakeholder-led exploration of alternative models, including options that might strengthen quality within the existing structure.
29. The feedback that the Law Council has received from across the legal profession demonstrates a widely held perception that the proposal has been developed within too compressed a timeframe. Concerns have been raised with us that the consultation process has not been sufficient to properly test options nationally with the result that the model proposed is not sufficiently supported by an evidence base that demonstrates that the proposed reforms will deliver the improved outcomes sought across the country.
30. The success of the model(s) ultimately adopted will be contingent on thoughtful, measured and demonstrable reform across legal education. Without that foundation, the restructure risks compounding existing deficiencies in graduate preparedness.
31. As discussed further below, the Law Council is very keen to work with the Committees to facilitate this process in a way that maintains the necessary sense of urgency.

Mutual recognition and the national legal profession

32. The Law Council notes that it is the intention of the Committees to maintain national consistency across university law schools, PLT and post-admission requirements.⁸ The Committees identify a number of adverse consequences that may arise from the loss of national consistency including creating different educational requirements for graduates in different jurisdictions and encouraging forum shopping between jurisdictions.⁹
33. As the Law Council recognised in our October 2025 submission to the LPAB, it is critical that reforms to legal education are canvassed, determined and implemented nationally, to avoid undermining the coherence of legal profession regulation across jurisdictions.¹⁰ The Law Council emphasises the importance of a nationally consistent approach to reform. This includes, wherever possible, consistency in the rules for admission and post admission education.

⁸ Legal Services Council Admissions Committee and Law Admissions Consultative Committee, [Review of Practical Legal Training](#) (Consultation Paper, April 2026) 7 (**Consultation Paper**).

⁹ Ibid.

¹⁰ Law Council of Australia, Submission to the Legal Profession Admission Board of New South Wales, *Discussion Paper on PLT Reform* (30 October 2025) 4-5.

34. The objectives of interjurisdictional consistency and professional interoperability are recognised throughout the legal profession legislation of the states and territories. Under section 3, the objectives of the *Legal Profession Uniform Law (Uniform Law)* are to 'promote the administration of justice and an efficient and effective Australian legal profession' including by 'providing and promoting interjurisdictional consistency in the law applying to the Australian legal profession'. Similar statements of objectives are found throughout legal profession legislation in other—non uniform law—jurisdictions. For example, section 3 of the *Legal Profession Act 2007* (Qld) provides that the main purposes of that Act include 'to facilitate the regulation of legal practice on a national basis across State borders'.¹¹
35. Uniformity is necessary to uphold the integrity of the national legal profession, facilitate mobility of graduates, and ensure that practitioners have equitable access to practice regardless of geographic location. Uniformity supports the best outcomes for practitioners by promoting professional interoperability through common expectations. Without a harmonised approach to PLT, disparities in training quality, regulatory expectations, and admission criteria may emerge, undermining the goal of a coherent and nationally recognised legal profession.
36. The Law Council is very concerned by feedback that, despite the best intentions of the Committees, the proposals will have a significant impact on mutual recognition of qualifications, with a likely fragmentation of professional qualification the result. This is particularly likely if the proposed changes to PLT are actioned in some jurisdictions and not others.
37. In the absence of uniform national reform and coordinated commencement, practical difficulties may arise where there are discrepancies in the point of admission. For example, a graduate who completes the proposed PLT requirements for NSW (including PALT) may not be eligible for admission in non-PALT states. Similarly, a graduate who has been admitted but has not completed the PALT requirement, may find it difficult to be granted a practising certificate in another state. This creates uncertainty for both practitioners and employers, and raises operational questions about how PALT completion (or partial completion) would be recognised, monitored and enforced.

Impact on the profession

38. The Law Council is also concerned by feedback about the impact that the reforms may have for particular parts of the profession—in particular, for smaller firms (including legal assistance sector organisations) and firms and practitioners located in rural, regional and remote (RRR) parts of Australia.
39. Many elements of the proposed reforms, including the introduction of PALT and changes to supervision, would shift or increase the burdens of practical training of early career lawyers to the practising profession and law firms. This burden would be particularly significant for smaller firms already experiencing significant pressures on limited resourcing.

¹¹ See also, *Legal Profession Act 2006* (ACT) s 6; *Legal Profession Act 2006* (NT) s 3; *Legal Profession Act 2007* (Tas) s 3.

40. As identified in the Law Institute of Victoria's report *Benchmarking the Costs and Challenges of Running a Legal Practice in Victoria in 2025*, many of these organisations are already experiencing significant pressures including challenges in maintaining regulatory compliance (including as a result of the incoming AML-CTF requirements), addressing business risks (such as cyber and technology risks), and attracting and retaining staff.¹²
41. The combination of these burdens has the potential to discourage smaller firms from employing graduates. We must avoid a situation where firms determine that it is not beneficial to employ and train new lawyers—particularly, in the context of the threat of AI to the availability of jobs for early career lawyers. Inadvertently reducing entry pathways into the profession poses significant risk to the sustainability of the profession and therefore to access to justice and the rule of law. The impact of such a result would ultimately be felt by the Australian public, not just the profession.

Timing and implementation

42. The Law Council acknowledges and broadly supports the intention of the Committees to implement reforms in a timely manner to ensure that the potential benefits are realised as soon as reasonably practicable. We consider it useful to set a deadline to focus reform efforts. However, we have received strong and consistent feedback about the proposed timing and implementation of the reforms.
43. The feedback we have received is to the effect that introduction of a national reform for introduction in 2028 cannot be achieved in the absence of consensus on the need, character and implementation of reforms in a way that is consistent and adapted to the needs of each jurisdiction.
44. It is widely perceived that, while the proposed model has been developed with the best of intentions, the timeframe for consultation and consideration has been compressed and more work needs to be done before a national model can be adopted. There would be a clear benefit in the Committees allowing additional time for careful consideration of potential reforms that are likely to have significant and wide-ranging implications for the legal profession across Australia.
45. Further, even if the proposed model is endorsed for adoption immediately, the feedback we have received is that the proposed timeframes are unworkable. This is particularly the case given the given the scale of the reforms and their impact across the continuum of legal education.

Proposed way forward

46. To support the genuine national consultation that the legal profession considers is necessary the Law Council agrees with the proposal to hold a national conference on practical training (**National Conference**). We consider that this should occur in October/November 2026. This conference would ideally not be limited to

¹² Cube Group Management Consulting for the Law Institute of Victoria, *Benchmarking the Costs and Challenges of Running a Legal Practice in Victoria in 2025: Insights from the LIV survey of sole and small-medium law firms* (Report, August 2025). See also Law Institute of Victoria, [LIV releases report Benchmarking the Costs and Challenges of Practising Law in Victoria in 2025](#) (Media Release, 13 August 2025).

consideration of PLT and would extend to the wider implications of embedding practical training throughout the continuum. It would, however, not extend to a wide-ranging discussion of all possible elements of legal education. The Law Council is keen to support the organisation of this National Conference.

47. In the intervening period, the Law Council commits to furthering consultations with the legal profession and will work hard to identify broadly supported reform options and an agreed way forward.

Consideration of the proposed reforms

Incorporating practical skills in law courses (Proposal 1)

48. The Accreditation Standards for Australian Law Courses (**Accreditation Standards**) do not currently include requirements for practical skills teaching and training as part of a law course. The Law Council understands that, as a result, the extent to which law schools incorporate practical skills in their courses varies widely.
49. Proposal 1 of the Committees is to amend the Accreditation Standards to require law schools to demonstrate how a set of prescribed practical skills have been included in their law courses with rigorous assessment. The proposed practical skills are set out in Appendix F to the Consultation Paper and are based on the skills schedule developed by the LPAB.¹³
50. Subject to the comments below regarding implementation, the Law Council supports the inclusion of increased and improved practical components in the law degree. Practical skills should be progressively developed from undergraduate study through to admission. This position accords with our recent submissions in relation to the Accreditation Standards.¹⁴
51. This position is linked to our view that we should be designing a continuum of legal education focused on developing new lawyers to be practice-ready and possess an adequate level of skill and knowledge to meet the needs of their employers, clients and the courts with an appropriate level of supervision. We strongly agree with the statement by the Committees that “it remains the case that legal education must be capable of preparing all students to seek admission and enter practice”.¹⁵
52. The Law Council recognises the difficulty for students in transitioning from academic theory to commencing legal practice. Early career lawyers consistently report a disconnect between academic legal education and the realities of practice, particularly in relation to autonomy, client interaction, and professional judgment.¹⁶

¹³ Legal Profession Admission Board of New South Wales, [Interim Report on PLT Reform](#) (13 March 2026), Annexure A.

¹⁴ Law Council of Australia, Submission to the Legal Services Council and Law Admissions Consultative Committee, [Proposed revisions to the Accreditation Standards for Australian Law Courses](#) (26 June 2025); Law Council of Australia, Submission to the Legal Services Council and Law Admissions Consultative Committee, *Proposed Revisions to the Accreditation Standards for Australian Law Courses - Targeted Consultation* (26 March 2026) 9.

¹⁵ Consultation Paper, 37.

¹⁶ Tony Foley, Margie Rowe, Vivien Holmes and Stephen Tang, ‘Teaching Professionalism in Legal Clinic – What New Practitioners Say Is Important’ (2014) 17 *International Journal of Clinical Legal Education* 5.

53. Greater integration of practical elements of ‘lawyering’ is desirable in law courses as it provides students with gradual and contextualised development of skills and knowledge and a greater understanding of their future reality. The earlier students have the opportunity to engage in the practical elements of practice, and begin building proficiency, the better.
54. However, careful design is needed in implementing this proposal in order to:
- maintain or improve educational integrity (including the rigour of assessment and the quality of teaching);
 - reflect resourcing limitations and current dynamics within the Australian tertiary education sector (e.g. academic targets in areas like research, publication and grant funding);
 - reflect the pressures on the members of the practising profession (who may be called on to undertake greater roles in education); and
 - ensure that a distinct meaningful professional training stage is retained.
55. This reform must be accompanied by appropriate resourcing and staffing, nationally consistent assessment standards, appropriate implementation timeframes and clear articulation of how skills taught in law degrees connect to PLT and post-admission learning.
56. The Law Council notes the significant amount of work required to review requirements for these topics and redesign curricula to ensure that there is a manageable balance between the theoretical and practical components. We have received mixed views for how this reform is best embedded in law courses.
57. The skills schedule included at Appendix F to the Consultation Paper envisions that practical training and assessment would be embedded throughout a law course, primarily in the in prescribed areas of knowledge (Priestley 11 subjects) including Criminal Law and Procedure, Civil Dispute Resolution, and Ethics and Professional Responsibility. As outlined in our previous submission regarding the Accreditation Standards, these courses may be well suited to embedding training and assessment—such as mootings, client interviews, witness examination, mock negotiations and mediations—which provide useful experience and address core needs of graduates as they move into legal practice or into other careers.¹⁷
58. In relation to the proposed approach which embeds practical training and assessment across the degree, we raise three issues for consideration:
- First, careful design would be required as to the timing and sequencing of training and assessment. Assessing skill and knowledge in a first- or second-year student is different to a more senior student or graduate who has the advantage of greater depth and breadth of learning.
 - Second, not all universities are currently equipped to deliver practical training effectively. For example, some academics may have spent significant time out of legal practice and may not be up to date with how to deliver client-based

¹⁷ Law Council of Australia, Submission to the Legal Services Council and Law Admissions Consultative Committee, *Proposed Revisions to the Accreditation Standards for Australian Law Courses* (26 March 2026) 9.

legal services. Law schools will need to find educators who can teach, assess and provide feedback to students on practical aspects of a degree. As discussed at paragraphs [38]–[41] above, many within the practising profession are already overstretched and under significant pressure. The ability of universities to draw on these practitioners is likely to be constrained.

- Third, the timeframes proposed are likely insufficient should reform result in changing staffing or resourcing requirements.

59. Alternatively, one suggestion received is that it would be more practicable to amend the Accreditation Standards to require the delivery of (two to four) specific practical units. These units could be provided by university educators with the necessary experience and expertise to teach practical elements effectively, without requiring such educators to be embedded throughout the course. The practical units could also be designed to reinforce subjects taught at a similar stage of the course. We note that one impact of this model would be to reduce the number of elective subjects that a student can study.
60. The Law Council suggests that further engagement with the legal profession and university sector is required on the implementation of this proposal.
61. We also suggest that further analysis of the methodologies adopted by those law schools that have embedded a degree of practical training within law degrees, together with an analysis of what has worked and what has not, is required. This will further inform discussion at the National Conference.

Redefining practical knowledge and skills (Proposal 2)

62. The current model of PLT is set out in the *Practical Legal Training Competency Standards for Entry-Level Lawyers (PLT Competency Standards)*.¹⁸ The PLT Competency Standards are designed to “describe the observable performance in key areas of legal practice required of entry level lawyers at the point of admission to the legal profession”.¹⁹ As noted in the Consultation Paper the PLT Competency Standards contain “146 separate performance criteria for the competencies that all law graduates must study, not including the optional practice areas”.²⁰
63. The Law Council agrees that the existing PLT Competency Standards are overly lengthy and complex and strongly supports replacing the current framework with a model that better reflects contemporary legal practice.
64. While adoption of the skills schedule at Appendix F is preferable to maintaining the PLT Competency Standards in their current form, there are ambient concerns that the proposed reforms redefine practical competence too narrowly, too rapidly, and without a sufficient opportunity for national consultation.
65. Any redesign of the skills/competency framework should be undertaken with the following elements in mind to ensure that changes strengthen professional formation and public protection:

¹⁸ Law Admissions Consultative Committee, [Practical Legal Training Competency Standards For Entry-Level Lawyers](#) (October 2017).

¹⁹ Ibid 1.

²⁰ Consultation Paper, 38.

- mapping across the continuum to demonstrate alignment between proposed competencies, undergraduate legal education, PLT, and post-admission development;
- development of valid and reliable mechanisms to assess competence against the new standards;
- completion of foundational design work (including mapping and assessment design) prior to adopting the framework; and
- retention of minimum competence assurance to ensure that reduced prescriptiveness will not undermine consistent, verifiable competence at admission.

66. We suggest that a comparative national review of the existing proposal and alternative models be undertaken to inform the reform process. We have received views that a comparison with the frameworks listed below, is required to ensure that the schedule is appropriately calibrated:

- the Victorian Legal Services Board + Commissioner's *Early Career Lawyer Capability Framework*;²¹ and
- the missing skills and suggested reforms identified in the QLS Report.²²

67. In response to Consultation Questions 2.2 and 2.3 regarding suggestions for potential inclusions or improvements to the skills schedule at Appendix F, the Law Council has received a number of suggestions. Some of these suggestions are summarised below for consideration by the Committees. While the Law Council supports adoption of some of these skills (for example around responsible use of AI), but not necessarily others to the same extent, we consider that they should all be subject to further discussion as part of any next steps:

- (a) responsible use and limits of emerging technologies including AI;
 - (i) Given the increasing use of AI in legal practice, a foundational understanding of its ethical and professional limits should arguably form part of pre-admission education. This includes risks relating to accuracy, confidentiality, costing, attribution, supervision and over-reliance. These are risks that disproportionately affect junior practitioners and their clients.
 - (ii) Certain powerful AI products, specifically adapted for the legal profession (such as Harvey and Legora), are apparently being offered free of charge to some universities now. These products are highly likely to fundamentally change the way in which a great deal of legal work is done. This means that within 2–3 years (or less) a generation of graduates will enter the profession as AI natives who may be much more experienced with use of these products than their supervisors. This will create special challenges that need to be thought through;
- (b) foundational practice literacy within ethics and professional responsibility;

²¹ Victorian Legal Services Board + Commissioner, [Early Career Lawyer Capability Framework](#) (December 2025).

²² Francina Cantatore, Tanya Atwill, Rachael Field, Bond University for the Queensland Law Society, [The job readiness of law graduates and entry level solicitors](#) (1 December 2022).

- (c) respectful behaviours including preventing and addressing bullying and harassment;
 - (d) causes and impact of domestic and family violence;
 - (e) cultural competence and the capability to engage with First Nations legal issues in an informed and respectful manner;
 - (f) negotiation and understanding of alternative dispute resolution options;
 - (g) professional identity formation; and
 - (h) interpersonal and reflective skills, including communication, feedback engagement, and self-assessment.
68. The Law Council does not wish to comment at this stage about whether Supervised Workplace Training should be retained as a pathway for completing PLT (as is currently the case in Queensland and Victoria). We note that only a very small percentage of law graduates seek to use this pathway.

Delivery of PLT (Proposals 3–6)

Duration of coursework

69. Currently, PLT coursework taught as part of a graduate diploma must be delivered at the Australian Qualifications Framework (**AQF**) Level 8 standard (this typically requires six-months to one year of study), or in the case of training other than a graduate diploma, 450 hours of coursework.²³
70. Proposal 3 of the Committees is to amend the PLT Standards to reduce PLT courses to a minimum four weeks in length, plus up to one week of pre-reading and viewing of preparatory materials.
71. The Law Council recognises the valid objectives behind this proposal, including to reduce the significant cost and time burdens of PLT, improve accessibility to the profession and ensure that PLT is focused, relevant, and better aligned with the realities of early practice.
72. However, feedback provided to the Law Council suggests that a four-week PLT ‘coursework’ program (combined with a 15-day workplace experience component, discussed further below) is unlikely to provide the level of assured competence required at the point of admission. While a 4-week readers course may be adequate for the comparatively smaller number of lawyers going to the bar, this is not enough time for graduates to absorb the broader range of skills involved in practice as a solicitor involving management of clients at the coalface as well as a myriad of other skills.
73. We have also received feedback that while the evidence of the surveys demonstrates widely held dissatisfaction with current delivery, it does not necessarily establish that such a significant reduction in the formation period would produce better results.

²³ Consultation Paper, 43.

74. While some evidence suggests that some areas currently included in PLT are not useful, some early career lawyers have identified that PLT already feels pressured and fragmented in its current form, with limited opportunity to consolidate learning or reflect on ethical and professional judgement.
75. Practical legal skill development requires sustained engagement, reflection, supervision, and structured assessment, these elements are not necessarily compatible with a significantly condensed delivery model. Compression may not allow for digestion, reflection, practice and improvement of skills prior to assessment and risks prioritising administrative efficiency and rapid completion over substantive competency development in new lawyers.
76. The proposal also depends on several interrelated reforms, including effective skills integration in law degrees, robust post-admission training, and consistently high-quality workplace supervision, all operating as intended. If any element underperforms, a four-week PLT risks leaving newly admitted lawyers inadequately prepared, transferring risk from the system to clients and supervisors.
77. The Law Council considers that further consideration and evidence is required to demonstrate that such a significantly shorter PLT program can deliver better protective outcomes for clients, courts and employers.
78. This is a topic that would benefit from further analysis and consideration at the National Conference.

Removing the graduate diploma requirement and TEQSA oversight

79. Proposal 4 of the Committees is to amend the PLT Standards to provide that a PLT program does not have to be delivered at a graduate diploma (or equivalent) level. The Law Council recognises the objectives of increasing flexibility in PLT delivery and reducing unnecessary regulatory burdens (including time and cost).
80. Feedback received by the Law Council has revealed two primary concerns about this proposal:
 - there is a risk that established oversight mechanisms will be removed without being replaced with a suitable alternative; and
 - there is a risk of cost-shifting rather than cost-reduction.
81. As recognised in the Consultation Paper, removing the requirement that PLT be delivered as a graduate diploma at AQF standard means that the PLT course will also not be subject to the oversight of the sector regulator, the Tertiary Education Quality and Standards Agency (**TEQSA**).²⁴
82. The oversight role will need to be performed by the relevant PLT accrediting body in each jurisdiction. This change in oversight risks weakening established, independent quality assurance at a critical point in professional formation, which admitting authorities are not resourced to replace. This alternative oversight framework is untested and is likely to be under-resourced and so it is not clear that, particularly in

²⁴ Ibid 44.

smaller jurisdictions, the relevant PLT accrediting body in each jurisdiction will have to capacity for appropriate oversight.

83. Further, as acknowledged in the Consultation Paper, a “disadvantage of this change is that students will not be eligible for FEE-HELP if the PLT program does not fulfill the AQF qualifications”.²⁵
84. The principal practical benefit of PLT being delivered as a graduate diploma is access to FEE-HELP, which plays a critical role in maintaining affordability. This funding mechanism significantly reduces upfront financial barriers and enables candidates to undertake PLT without immediate personal means or access to financial support. The Law Council is concerned that this proposal may just provide different financial barriers to admission rather than substantially reducing such barriers.
85. Many PLT students study and work concurrently and rely on fee assistance to make PLT achievable. Moving to a model that requires upfront course payment (and potentially travel and accommodation expenses associated with accessing in-person courses) may risk turning PLT into a pathway that is only available to those with means at the time of undertaking PLT or access to personal financial support (from family or an employer). This outcome could undermine accessibility and equity and is likely to particularly impact PLT students with caring responsibilities, those already under cost-of-living pressures, and those seeking to enter public interest roles, small firms and RRR practice (which cannot cover the cost of staff undertaking PLT).
86. The proposal to shorten PLT course duration and work experience requirements may lower PLT student costs. However, there is also a risk that this is merely a cost-shifting exercise where the burden is subsequently placed on universities (through greater requirements to incorporate practical skills into law courses) and law practices. Ultimately, students may still incur this cost-shift burden as universities and law practices may recover costs via higher university course fees, and/or lower graduate wages.
87. The Law Council considers that wide implementation of this proposal should be preceded by piloting and the development of a nationally agreed alternative oversight framework.
88. Again, the Law Council considers that these are topics that would benefit from further analysis and consideration at the National Conference.

In-person delivery

89. Proposal 5 of the Committees is to amend the PLT Standards to require that PLT coursework be delivered in-person with limited exceptions for synchronous online learning.
90. The Law Council broadly supports incorporating greater minimum requirements for face-to-face in-person teaching as part of PLT. The Law Council notes that the

²⁵ Ibid.

national survey evidence and the Tasmanian experience demonstrate materially stronger outcomes where PLT is delivered face-to-face and by practitioners.²⁶

91. The Law Council notes that early-career lawyers, including from the Law Council's Young Lawyers Committee, have demonstrated a very strong preference for PLT coursework to be delivered in person. Feedback from recent graduates indicates that over-reliance on online delivery has negatively impacted the perceived quality of PLT.
92. There are significant concerns within the legal profession about the effectiveness of wholly online education models in facilitating engagement, interaction and interpersonal skills in that environment.
93. We recognise that the law is fundamentally a human-centred practice, involving at its core the need for strong interpersonal communication skills. We consider that those interpersonal skills are best learned through in-person interaction over time, and extensive intentional practice. In-person interaction also facilitates the development of professional networks, and is essential in consolidating professional knowledge, customs, connection and resilience.
94. We consider that in-person training, wherever possible, supports the creation of a professional culture which is based on shared principles and values. In the legal profession, much depends on a culture of adherence to overriding ethical and regulatory requirements over a person's professional lifetime. Opportunities to entrench a positive sense of the duties and obligations of a legal practitioner at the outset of that person's career should not be overlooked.
95. Despite the above, the Law Council accepts that consideration is required to ensure that preferred delivery models do not inadvertently exclude capable candidates or undermine equitable access to the profession. In the Northern Territory, for example, there is no PLT provider—their graduates have no choice but to undertake PLT online. The Law Council recognises the importance of retaining sufficient flexibility in delivery modes and implementation to address accessibility considerations, including for graduates in RRR Australia, people with disability, those with caring responsibilities, and those facing significant financial barriers.
96. The Law Council is concerned that 'exceptional circumstances' should be carefully defined and navigated. Further consideration needs to be given to who will adjudicate whether 'exceptional circumstances' exist, and how to achieve consistency on its application—including categories of automatic exemption.
97. While most graduates will be in urban areas, we are also mindful that a four week in-person program may have direct and indirect costs linked to attendance which disproportionately affect RRR legal practitioners (and their employers). Indirect costs include travel and accommodation costs for RRR legal practitioners required to leave their locality for extended periods to undertake PLT, as well as costs to law practices that may be without a law graduate while they attend face-to-face sessions.

²⁶ Ibid 33 citing Urbis, for the Legal Services Council on behalf of the Admissions Committee and the Law Admissions Consultative Committee, [National Practical Legal Training Research](#) (Survey Research Report, March 2026).

98. If in-person participation is to be the default, which in general terms we support, the reform package should include a credible regional access plan (for example, scheduled delivery in regional centres and/or high-quality synchronous options) so that geographical location does not become a proxy barrier to admission.
99. The Law Council is keen to work with the Committees on developing such a plan.

Ensuring rigorous assessment in PLT

100. Under Proposal 6, the Committees will review the PLT Standards to ensure that assessments are rigorous in measuring whether students have developed the required knowledge and skills.
101. The Law Council strongly supports strengthening assessment standards to ensure PLT completion genuinely signals minimum competence. This includes performance-based assessment, clear and validated criteria, limits on resubmission, and national moderation across providers.

Workplace experience (Proposals 7–12)

Duration of workplace experience

102. Clauses 4.1 and 4.2 of the PLT Competency Standards currently require a minimum requirement of 15 days of workplace experience. Proposal 7 of the Committees is to maintain this minimum requirement.
103. In practice, many PLT students are currently required to undertake significantly greater workplace experience (often 75 days). As noted by the LPAB, while such extensive PLT workplace experience is not legislatively prescribed, it is a practical way by which some PLT providers satisfy TEQSA's volume of learning requirements for a Graduate Diploma at AQF Level 8.²⁷
104. The Law Council acknowledges that requiring graduates to undertake substantial work before they can be admitted, potentially unpaid, constitutes a very significant barrier to entry, especially for those from lower socio-economic backgrounds and/or those who need an income to support themselves and their families. There is support within the profession to reduce these barriers.
105. However, 15 days may not represent an adequate or evidence-based minimum for the learning outcomes workplace experience is designed to achieve. It is important to consider factors including that:
 - (a) onboarding requirements will necessarily reduce the amount of time a graduate spends on meaningful work. If work experience is only 15 days (as opposed to say 45 or 75) the proportion of time spent on onboarding is greater and the return for the employer is lower;

²⁷ Legal Profession Admission Board of New South Wales, [Interim Report on PLT Reform](#) (13 March 2026) 7.

- (b) not all law graduates are employed in the legal sector during their studies and additional workplace experience may be particularly valuable for this cohort; and
 - (c) if the resources required to train and supervise staff in small to medium sized firms and legal assistance sector organisations are too burdensome for a 15-day period (particularly given the time that may be required for onboarding), this will disincentivise legal practices from offering workplace experience opportunities.
106. Retaining a minimum of 15 days' work experience while simultaneously reducing PLT coursework to four weeks produces the lowest total pre-admission formation quantum in the history of the current system. No comparable regulated profession operates on this basis.
107. The Law Council considers that a more substantive process is required to determine the appropriate timeframe required to develop the competencies that workplace experience is meant to produce.
108. The Law Council is keen to work with the Committees on developing such a process.

Workplace experience standards and guidance for supervisors

109. The Law Council broadly supports Proposals 8–10 to provide clearer and more structured standards for workplace experience and provide practical guidance and training for supervisors. These measures respond directly to survey findings by clarifying expectations and reducing uncertainty when certifying competence.
110. Any increase in the expectations of work experience should not be so prescriptive as to impact the willingness of employers and the profession to provide supervision, nor limit the availability of supervision to PLT students.
111. This is extremely important. It would be unfortunate indeed if a consequence of reform is to discourage small employers (who are, after all, the overwhelming majority of the legal profession) from employing young people.

Limited recognition of prior workplace experience during the law degree

112. Proposal 11 would amend the PLT Standards and the *Standards for PLT Workplace Experience* to allow students to undertake workplace experience while studying their law course. PLT providers would still play a role in certifying, after the fact, that the workplace experience was appropriate.
113. The Law Council supports the recognition of relevant work experience undertaken prior to degree completion, provided that it is aligned with structured educational outcomes and undertaken at an appropriate time within undergraduate study.
114. It would be appropriate to permit only work experience that has occurred in the two years prior to commencing PLT course work. This would prevent graduates from counting work experience that occurred early on in their degree, prior to them having received the practical understanding of the law from their university study necessary to practice certain skills.

Post-admission legal training (PALT) (Proposals 13–16)

115. Proposal 13 would impose a new requirement as a condition on practising certificates for early career lawyers to undertake 15 hours of PALT in each of their first two years of practice. This would involve completing two specialist 7.5-hour courses in each of the two years, each of which would be preceded by pre-reading and required substantive rigorous assessment (Proposal 19).
116. Proposal 15 provides that PALT is to be delivered in areas identified and developed by PALT providers, subject to approval mechanisms. This may include area specialities such as criminal law, immigration law, family law, property law and so on. PALT options may also vary depending on types and places of practice, such as targeted studies for government lawyers, legal assistance sector lawyers and in-house counsel, or be targeted to suburban, RRR or even large firms.²⁸
117. The Law Council recognises that professional competence continues to develop after admission and that structured post-admission training should form part of a lifelong learning continuum. There is merit in considering introducing greater structure to the post-admission period, noting that the quality of supervision may be variable, and even the highest quality of supervision could benefit from being complemented by additional structured learning during this period.
118. The Law Council has received significant and largely consistent concern from its constituent bodies regarding the proposed introduction of PALT. As discussed below, PALT requires further consideration to ensure that accreditation is suitably located, that training delivers the outcomes sought and that the costs are not a further barrier to admission. The Law Council also holds some concern about PALT becoming a substitute for comprehensive preadmission competency formation.

Point of admission and restriction on practice

119. Feedback to the Law Council has consistently identified a risk that the introduction of PALT as proposed with shift essential formative learning into the post admission stage, potentially weakening readiness for practice at the point of admission.
120. The Law Council is of the view that admission should continue to signify that a graduate:
- has already attained threshold level of practical competence, ethical understanding, and professional capability; and
 - is able to begin performative legal work with appropriate supervision.
121. Newly admitted lawyers must possess an adequate level of skill and knowledge, in a supervised context, to meet the needs of their employers, the courts and, importantly, their clients. Admission is an important consumer protection mechanism and is an important signal to clients and the public that members of the profession meet a threshold level of competence.
122. Reliance on limited training hours and post-admission assessment risks blurring the role of admission by permitting practice before core competence is fully established—

²⁸ Consultation Paper, 55-56.

particularly in the context of a reduced PLT component. In our view, post-admission training should extend and consolidate competence, not compensate for reduced pre-admission formation.

123. On the other hand, many graduates will have no idea what areas of practice they may end up in and much may depend upon the tightness of the job market at the time. For example, many graduates may secure employment at a firm specialising in family law and an obvious PALT course would be one in family law (and in any event may be better undertaken in PALT alongside practice rather than at university or PLT).
124. Proposal 16 suggests that lawyers who are undertaking PALT would have further restrictions placed on their practising certificate, for example, restricting them from areas such as taking clients on their own and signing legal advice. The Law Council recognises that practice restrictions are proposed as a safeguard to manage risk during post-admission training and acknowledges the intent to protect clients.
125. However, admitting a lawyer to practice while imposing significant contingent restrictions based on outstanding competence assessment raises conceptual and practical concerns. Admission is a threshold act that signals qualification; qualifications that remain conditional undermine clarity for clients and employers and complicate regulatory enforcement.
126. In busy practice environments, particularly in small firms, restricted lawyers may nevertheless be required to undertake tasks beyond their preparedness, creating precisely the risk the restrictions are intended to mitigate. The proposal may also disproportionately impact regional areas where firms are likely to be smaller and less able to accommodate and supervise a restricted practitioner.
127. The Law Council considers that any restrictions regime requires detailed co-design with the legal profession and regulators before adoption and that competence-based assessment with career-limiting consequences is more appropriately located pre-admission rather than post-admission.

Delivery of PALT (Proposals 17–19)

Duration

128. As noted above, under Proposal 13, early career lawyers would be required to undertake 15 hours of PALT in each of their first two years of practice. The Law Council generally considers 15 hours (equivalent to two days) per year for each of the two years of supervision to be an appropriate amount of additional structured learning.
129. However, we acknowledge the costs concerns of PALT being undertaken on top of continuing professional development (**CPD**) requirements. The Consultation Paper indicates that “existing CPD arrangements would remain unchanged, including for newly admitted lawyers”.²⁹ This would require all lawyers undertaking PALT to

²⁹ Consultation Paper, 55.

undertake 25 hours of training (PALT and CPD) in each of their first two years of practices.

130. Similar to the concerns raised at paragraphs [83]–[87] above about the cost and accessibility of the proposed PLT reforms, the Law Council notes that:
- (a) many early career lawyers may not have the financial means to pay for PALT upfront (despite it being potentially being tax-deductible);
 - (b) the cost burden is likely to fall to employers;
 - (c) while many employers (particularly larger firms) will be able to reasonably meet these costs, this will not be the case in all circumstances. Smaller practices, RRR practices and legal assistance sector organisations and, where graduates are already likely to be on lower salaries, may not be in such a position (see also the comments at paragraphs [38]–[41] above); and
 - (d) the cost burden (when combined with the impacts of other proposals) may deter some firms from taking on newly admitted lawyers.
131. In the Law Council's view, in considering the implementation of a PALT requirement progress, consideration should also be given to removing or significantly reducing the CPD requirement on top of the PALT requirements. This would go some way to reducing the cost and accessibility burden on early career lawyers and their employers, while maintaining a requirement for structured learning.

In-person delivery

132. Proposal 17 provides that PALT should be delivered face to face and in-person or, in exceptional circumstances (as determined by the PALT provider), by synchronous online learning.
133. As outlined above at paragraphs [90]–[94], the Law Council broadly supports incorporating greater minimum requirements for face-to-face in-person teaching as part of legal education across the continuum. This applies equally to PALT.
134. In our view, education and assessment in an in-person environment is preferable for the development of:
- practical knowledge and skill;
 - interpersonal and communication skills;
 - professional networks; and
 - professional culture.
135. However, we reiterate that a flexible approach is required to ensure that preferred delivery models do not undermine equitable access to the profession including for graduates in RRR Australia, people with disability, those with caring responsibilities, and those facing significant financial barriers.
136. As recommended in relation to Proposal 5, the Law Council suggests that the 'exceptional circumstances' for permitting synchronous online learning should be carefully defined and potentially expanded to provide categories of automatic

exemption (for example based on geographical constraints). The suggested regional access plan is also critical in ensuring that geographical location does not become a proxy barrier to admission.

Regulation and oversight of PALT courses

137. Proposal 18 provides that the content and providers of PALT courses should require approval by the regulator that issues practising certificates to solicitors. The providers could be local law societies, existing PLT providers or others.
138. The Law Council has received significant feedback from several of its constituent bodies responsible for issuing practising certificates about their capacity (budget, membership or infrastructure) and capability (staffing and expertise) to implement this proposal. There is particular concern that this proposal would have a disproportionate impact in jurisdictions with smaller legal professions.
139. Establishing and maintaining an approval scheme requires clear standards and guidance, assessment of provider applications and course materials, periodic re-approval and audit processes, mechanisms to manage conflicts and complaints, and ongoing monitoring of delivery and assessment integrity. Where the scheme contemplates exemptions (for example, from in-person attendance) or recognises multiple providers, it also requires consistent decision-making, record-keeping and review pathways to avoid inequity and jurisdictional inconsistency.
140. If the implementation of a PALT requirement is to be progressed, additional consultation with the legal profession and regulators is required to develop a model or models of regulation and oversight that can be applied nationally. These models may require alternatives where smaller organisations are not well-placed to take on these functions.

Clinical legal education (Proposal 20)

141. The proposal to include clinical legal education as a component of PLT, whether on a mandatory or optional basis, has some merit and should be the subject of further analysis.
142. The Law Council generally supports clinical legal education, particularly as a means of strengthening the connection between legal theory, practical skills, ethics, and professional identity formation. Clinical legal education is often the first opportunity a law student has in engaging with members of the public and is widely recognised as best practice in the education of law students.³⁰
143. However, effective clinical legal education is resource-intensive and cannot simply be expanded without significant institutional cost and investment. High quality clinical

³⁰ Adrian Evans et al, *Australian Clinical Legal Education: Designing and Operating a Best Practice Clinical Program in an Australian Law School* (ANU Press, 2017); Susan Toohey, *Designing Courses for Higher Education* (Open University Press, 1999); Marlene Le Brun & Richard Johnstone, *The Quiet Revolution: Improving Student Learning in Law* (Law Book Co., 1994), 310-311; Sally Swift & Kana Nakano, *Reimagining the Professional Regulation of Australian Legal Education* (Council of Australian Law Deans, 1 December 2021), 108-111.

programmes require experienced supervisors, manageable student to supervisor ratios, administrative infrastructure, and sufficient placement opportunities.

144. Opportunities for meaningful experiential learning may be unevenly distributed, particularly for regional students, students without professional networks, and candidates balancing employment and caring responsibilities.
145. The Law Council also understands that many providers of clinical legal education (such as community legal centres) are likely to prefer a model which takes place over a longer period of time, where the cost of training and onboarding participants can be spread out and this investment results some return to the organisation. More limited options that might form part of a 15-day PLT workplace experience component risk providing limited return on investment to the organisation providing clinical legal education.

Supervision of early career lawyers (Proposal 21)

146. Proposal 21 states that:

Legal profession regulators should establish a working group to develop additional guidance and resources for supervisors of lawyers as part of their supervised legal practice. This may include guidance materials, templates and training sessions for supervisors.

This group should also consider if there is any need for regulatory reform to support improved supervision and develop recommendations for any such reforms.³¹

147. The Law Council supports this proposal.
148. Supervision of early career lawyers is a critical component of professional development. Quality supervision contributes to positive outcomes for practitioners, their employers and the public.
149. The Law Council recognises that proper supervision by senior practitioners is also a requirement under the *Australian Solicitors' Conduct Rules*.³² Under rule 37, a “solicitor with designated responsibility for a matter must exercise reasonable supervision over solicitors and all other employees engaged in the provision of the legal services for that matter”.
150. However, there is strong consensus in the feedback received that supervision is an area of the legal education continuum that requires improvement. Across jurisdictions, there is broad acknowledgement that supervision quality is currently inconsistent, insufficiently structured, and heavily dependent on individual workplace environments and networks.
151. We have therefore received support for developing consistent supervision standards and developing structured supervisor education/training and, as set out above, would welcome the opportunity to be a part of the proposed working group.

³¹ Consultation Paper, 64.

³² See, eg, *Legal Profession Uniform Law Australian Solicitors' Conduct Rules 2015* (NSW); Law Council of Australia, [Australian Solicitors' Conduct Rules 2022](#) (Commentary, March 2024) 125.

152. Notwithstanding the above comments, we reiterate our broader concerns about the impact of the proposed measures falling on practitioners and law practices to deliver and the impact that this might have on equity, access to justice, and sustainability within the profession (see paragraphs [39]–[42] above).
153. Without proper support and regulation, greater dependence on workplace supervision may lead to inconsistent training outcomes and unequal professional development opportunities for graduates across the country. We also caution that increasing supervisory burdens may discourage smaller firms from employing graduates, potentially reducing entry pathways into the profession and adversely affecting regional legal service delivery.

About the Law Council of Australia

The Law Council of Australia represents the legal profession at the national level; speaks on behalf of its constituent bodies on federal, national, and international issues; promotes and defends the rule of law; and promotes the administration of justice, access to justice, and general improvement of the law.

The Law Council advises governments, courts, and federal agencies on ways in which the law and the justice system can be improved for the benefit of the community. The Law Council also represents the Australian legal profession overseas, and maintains close relationships with legal professional bodies throughout the world. The Law Council was established in 1933, and represents its constituent bodies:

- the Australian Capital Territory Bar Association;
- the Law Society of the Australian Capital Territory;
- the New South Wales Bar Association;
- the Law Society of New South Wales;
- the Northern Territory Bar Association;
- the Law Society Northern Territory;
- the Bar Association of Queensland;
- the Queensland Law Society
- the South Australian Bar Association;
- the Law Society of South Australia;
- the Tasmanian Bar;
- the Law Society of Tasmania;
- the Victorian Bar Incorporated;
- the Law Institute of Victoria;
- the Western Australian Bar Association;
- the Law Society of Western Australia; and
- Law Firms Australia.

Through these bodies, the Law Council represents more than 110,000 Australian lawyers.

The Law Council is governed by a board of 23 Directors: one from each of the constituent bodies, and six Executive members elected by Directors. The Directors meet quarterly to set objectives, policy, and priorities for the Law Council. Between Directors' meetings, responsibility for the policies and governance of the Law Council is exercised by the Executive members, led by the President. In 2026, the Law Council Executive comprises:

- Ms Tania Wolff, President
- Ms Elizabeth Shearer, President-elect
- Mr Lachlan Molesworth, Treasurer
- Ms Jennifer Ball, Executive Member
- Mr Justin Stewart-Rattray, Executive Member
- Mr Ante Golem, Executive Member

The Chief Executive Officer of the Law Council is Dr James Popple.

The Law Council's Secretariat is based in Canberra. Its website is www.lawcouncil.au.