LAW FIRMS AUSTRALIA

Email 22 May 2026

The Honourable Justice François Kunc
Chair of the Legal Services Council Admissions Committee
Chair of the Law Admissions Consultative Committee
19 O'Connell Street
Sydney NSW 2000

c/o: submissions@legalservicescouncil.org.au

Dear Judge

Review of Practical Legal Training

I write on behalf of Law Firms Australia (**LFA**) in relation to the consultation paper titled "Review of Practical Legal Training" (**the consultation paper**), issued by the Legal Services Council Admissions Committee and the Law Admissions Consultative Committee (**the Committees**). LFA represents multi-jurisdictional law firms, Allens, Ashurst, Clayton Utz, Corrs Chambers Westgarth, Herbert Smith Freehills Kramer, Mallesons, MinterEllison, and Norton Rose Fulbright Australia. LFA is also a constituent body of the Law Council of Australia, the peak representative organisation of the Australian legal profession.

LFA appreciates the ongoing work undertaken by the Committees in reviewing practical legal training (**PLT**), including the recent national PLT survey and the engagement with the PLT review being undertaken by the New South Wales Legal Profession Admission Board.

Appendix A to this letter contains the feedback form issued with the consultation paper, completed with the views of LFA. The Committees will note that LFA supports, in principle, the proposals to embed additional practical skills development in law courses, to shorten PLT to an intensive program, and to implement post admission legal training (**PALT**). This support is on the bases:

1. that law graduates have reasonable access to intensive PLT programs at a reasonable cost,
2. that law firms may be accredited to provide PALT to early career lawyers at their firms,
3. that national consistency in training and admission is maintained, and
4. that the implementation timeframe is achievable for PLT and PALT providers.

Each of these views is explained in detail in our responses set out in Appendix A. LFA wishes to draw particular attention, however, to the importance of national consistency in several respects. Whilst national consistency is especially important to LFA member firms given that they operate in seven states and territories,[1] it may reasonably be assumed to also be important to other law firms that operate across jurisdictions, and to any lawyer that may wish to practise law in different locations.

1. As is noted in the consultation paper,[2] requirements for admission, including PLT, and licensing are similar across all states and territories, and it is this similarity which is central to the success

[1] All member firms have offices in New South Wales, Victoria, Western Australia, and Queensland, four member firms have offices in the Australian Capital Territory, one member firm has an office in South Australia, and one member firm has an office in the Northern Territory.

[2] Consultation paper, p 18.

of the mutual recognition arrangements under the legal profession legislation and the *Mutual Recognition Act 1992* (Cth).

Ensuring the continued operation of mutual recognition in the Australian legal profession should be a guiding principle for PLT reform. This is of the utmost importance for: individual lawyers that wish to either maintain practices in multiple jurisdictions, or change location during their careers, and; for law firms that operate across jurisdictions that need to deploy solicitors to different offices from time to time to meet clients' needs.

Whilst this would ideally be achieved by ensuring that PLT regimes are consistent across Australia, including for the reasons immediately below, it is critical that mutual recognition arrangements continue regardless.

2. The consultation paper notes[3] several issues to which inconsistent PLT arrangements across Australia would give rise; namely, unintended costs consequences for PLT providers (which would likely be borne, at least in part, by graduates), and the potential for arbitrage in admission requirements and resultant forum shopping by graduates. These are real and significant concerns.

3. It is important that recognition of admission extends to the application of PALT requirements. This is relevant to foreign qualified lawyers seeking admission in Australia regardless of whether PLT requirements remain consistent across jurisdictions, as well as to Australian lawyers seeking to change their registration from one jurisdiction to another.

   In the case of the former, foreign qualified lawyers seeking admission to the Australian profession should not be required to undertake PALT where their experience is commensurate with that expected of an Australian lawyer that has completed PALT. This aligns neatly with the current process, where foreign qualified lawyers have their formal qualifications assessed by an admitting authority as part of their admission application, or in the case of an experienced practitioner, as assessment of their experience in practice overseas. If PALT is to be implemented as a discretionary condition imposed by the relevant local regulatory authority,[4] then that discretion should not be exercised with respect to such foreign qualified lawyers being admitted in Australia. If PALT is implemented by way of a category of continuing professional development (**CPD**), then similarly, such lawyers should be exempted from undertaking that CPD.

   Issues concerning PALT requirements and Australian lawyers seeking to change their registration from one jurisdiction to another fall away if PLT changes are implemented in a consistent form and manner across Australia. If, however, some jurisdictions implement PLT consisting of an intensive PLT program and PALT (**PALT jurisdictions**), whilst some jurisdictions continue with arrangements similar to the status quo (**non-PALT jurisdictions**), then two PALT issues may arise. First, a lawyer admitted in a PALT jurisdiction may seek to practise in a non-PALT jurisdiction. In this case, and as noted above at 1., it is critical that mutual recognition arrangements continue such that the lawyer's right to practise is recognised in the non-PALT jurisdiction. Conversely, a lawyer admitted in a non-PALT jurisdiction, regardless of whether they are in their first two years' of practise, should not be required to undertake PALT when seeking to practise in a PALT jurisdiction.

[3] Consultation paper, p 7.

[4] See consultation paper, pp 54-55.

It should also be the case that a graduate can undertake a PALT course, or courses, in one jurisdiction, and additional PALT courses in a different jurisdiction or jurisdictions, without being required to repeat PALT courses, or have the earlier PALT courses assessed for adequacy.

4. Law firms should be able to be accredited to provide PALT to early career lawyers at their firms for two main reasons:

    a. The PALT courses will be tailored to the areas of law, and the skills required in those areas, which are expected to be relevant to the early career lawyers at accredited firms,

    b. It will likely increase the supply of PALT positions generally, which may be important, particularly during the initial phase of PLT reforms being implemented. If law firms are not accredited to provide PALT, then all early career lawyers will need to undertake PALT with third party providers. This could have two flow-on effects. First, unless PALT prices are capped, which may disincentivise some providers from entering the market, increased demand for PALT places may put upwards pressure on prices. Secondly, if PALT places are in high demand, early career lawyers may enrol in the first available PALT course, rather than in PALT courses most relevant to their career, to meet the regulatory requirements as quickly as possible.

    If law firms are permitted to be accredited to provide PALT, and to incentivise as many firms as possible to seek such accreditation, then:

    a. Training should be able to be delivered across all Australian offices, which may require synchronous online learning from time to time. For instance, a project finance expert in Perth should be able to deliver in-person training to lawyers in Perth, but also to lawyers in Sydney, Melbourne, and Brisbane simultaneously. This would ensure consistency of training for the lawyers, increase the ability of senior lawyers to provide PALT (by reducing the need for travel or substituting instructors), and reduce costs for firms.

    b. There should be consistent PALT standards across jurisdictions, together with mutual recognition of PALT accreditation.

    c. Requirements should permit some flexibility to law firms (for instance, completing the annual 15 hours across five 3-hour sessions, or a combination of sessions of different lengths). This will allow law firms to tailor the additional training to best address the needs of newly admitted lawyers in their areas of practice, whilst also leveraging existing training programs.

Thank you for the opportunity to provide these comments, together with those in response to the Committees' questions at Appendix A. We would appreciate continuing to be involved in the development of PLT reforms.

Yours faithfully

[redacted]

Mitch Hillier
Executive Director
Law Firms Australia

P [redacted]
M [redacted]
E [redacted]

Appendix A: *LFA 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? LFA supports, in principle, embedding additional practical skills development in law courses. We defer to the LACC, the LSC Admissions Committee, and law schools on the methods by which this is best achieved.
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? LFA does not provide comment.
1.3	Would law schools be able to implement these changes by the beginning of the 2028 academic year, as proposed? LFA does not provide comment.
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? LFA supports the proposal to amend the PLT Competency Standards as suggested in the consultation paper. The proposed standards represent an appropriate baseline for a newly admitted lawyer, noting that solicitors will also be required: to be supervised for their first two years of practice, complete continuing professional development in the usual way, and should other proposals also be adopted, complete PALT. It is expected that this continuum of training will advance, and supplement, the skills set out in proposed skills schedule.
2.2	Do you suggest any amendments to the categories or skills set out in the skills schedule at **Appendix F**? LFA does not provide comment.
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?

As a general principle, LFA believes that the skills schedule should be targeted to those matters: that are necessary for all, or at least most, types of legal practice, and; that are otherwise not reasonably expected to be covered by mandatory training in other settings. This will be particularly important should an intensive PLT course be introduced; if certain matters are not, or will not, be covered as part of a law course, then care must be taken to ensure that the inclusion of such matters does not unduly stretch the intensive PLT course.

In respect of the individual topic areas listed above:

i. LFA would tend against the inclusion of this topic in the skills list. It will undoubtedly be important for certain areas of legal practice but can be better addressed through either PALT or CPD courses.

ii. LFA member firms are committed to ensuring that their workplaces are free from harassment (including sexual harassment), discrimination, and bullying. It is recognised that it is incumbent on all employers to actively foster safe and inclusive working environments and ensure that workplace culture is based on mutual respect.

   It may reasonably be expected that lawyers, and aspirant lawyers, will undertake sexual harassment training through at least two channels moving forward.

   First, all providers of tertiary education under the *Higher Education Support Act 2003* (Cth) have been required to implement a range of sexual harassment measures, including delivery of ongoing, comprehensive prevention education and training to students, leadership, and staff, since the start of 2026.[5] Law students may be expected, therefore, to undertake sexual harassment training throughout their studies.

   Secondly, all employers have a positive duty to take reasonable and proportionate measures to eliminate, as far as possible, sexual harassment in their workplaces.[6] The Australian Human Rights Commission (**AHRC**), being the regulator responsible for oversight and enforcement of the positive duty, has made clear that the implementation of appropriate workplace training and education is important to satisfy the duty. Standard 3 in guidelines issued by the Commission[7] states:

   > *Organisations and businesses support workers (including leaders and*

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[5] See National Higher Education Code to Prevent and Respond to Gender-based Violence 2025, made under the *Universities Accord (National Higher Education Code to Prevent and Respond to Gender-based Violence) Act 2025* (Cth). All tertiary education providers registered under the *Tertiary Education Quality and Standards Agency Act 2011* (Cth) have until 1 January 2027 to implement the prescribed measures (see cl 2 of the Code).

[6] *Sex Discrimination Act 1984* (Cth), s 47C.

[7] AHRC, 'Guidelines for Complying with the Positive Duty under the Sex Discrimination Act 1984 (Cth)', issued August 2023, available at <https://humanrights.gov.au/__data/assets/file/0030/46974/Guidelines-for-Complying-with-the-Positive-Duty-2023.pdf>

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managers) to engage in safe, respectful and inclusive behaviour through education on:

expected standards of behaviour, including actions and attitudes that foster equality and respect
identifying behaviours that constitute relevant unlawful conduct, and the consequences for engaging in such conduct
their rights and responsibilities in relation to safe, respectful and inclusive workplaces and working relationships. This includes their role in preventing and responding to relevant unlawful conduct.

It follows that lawyers, upon entering the profession, will continue with sexual harassment education.
It may be duplicative to include sexual harassment education in the skills schedule to be addressed as part of a law course, or in the intensive PLT course.
iii. Awareness of obligations under AML/CTF regulations should not be included in the skills schedule for two reasons.
First, most obligations under the AML/CTF regulations are imposed on the entity, for instance a law firm, providing a designated service, rather than individual solicitors (with a notable exception being the requirement to lodge a suspicious matter report in prescribed circumstances).
Secondly, entities offering AML/CTF designated services are required to provide training on AML/CTF obligations to all relevant employees; it follows that all solicitors involved in the provision of designated services will receive this training at the outset, and throughout, their employment, with such training being directed to the nature, size and complexity of the services rendered by the firm.
To the extent that a view is formed that barristers should have an awareness of AML/CTF regulations, this could be incorporated into Bar practice and readers' courses.
iv. Skills relating to alternative dispute resolution will be particularly relevant to some, but not all, areas of practice. Such skills should be developed in PALT and CPD courses, or supervised practice generally.
v. The development of negotiation skills in a wider range of, or specific, settings, is unnecessary. A purpose of PALT and CPD modules is to address those matters that are relevant to 'specific settings' or practice areas. It is through these channels that those skills should be developed.
vi. LFA does not suggest adding the drafting of other forms of legal document to the skills schedule; again, the inclusion of such matters risks making the skills schedule unduly granular.
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Should the option for graduates to undertake Supervised Workplace Training as a way of completing PLT be retained?
LFA does not provide comment.
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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? See response to 2.4.
2.6	Should there be any other amendments to Supervised Workplace Training? See response to 2.4.
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? Yes. A four-week intensive course, supplemented by preparatory reading, is an appropriate delivery model for the proposed skills schedule, particularly if additional skill development is incorporated into law courses and continued post-admission through PALT. The reduction in length of PLT should materially reduce its cost, although the overall financial impact on graduate lawyers will also depend upon the cost and incidence of PALT. As flagged in the consultation paper, the length of the course should be reviewed after two years of operation, with a view to reducing it further as appropriate. LFA notes it will be important: • for graduates across all jurisdictions, and in metropolitan, suburban, and regional areas, to have reasonable access to PLT courses, • for PLT courses to be able to meet demand from graduates each year, and • for the costs of PLT courses to be reasonable, noting the proposal at 4.1 that PLT courses will not be required to meet the Australian Qualifications Framework (**AQF**) requirements.
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? See response to 3.1.
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? Yes. It will be important, however, that the cost of PLT courses be reasonable, particularly for those that do no attract FEE-HELP under the proposed model, for graduates that are meeting the costs of PLT themselves. LFA also supports the flexibility of the proposed model that would permit existing PLT courses, such as those provided by the Piddington Society in Western Australia and the Centre for Legal Studies in Tasmania, to continue to be offered and undertaken, on

	the basis that mutual recognition of admission requirements continues.
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? LFA does not provide comment.
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? LFA recognises the pedagogical and relationship benefits of face-to-face practical training. As noted above at 3.1 however, it will be important that all graduates across all jurisdictions, and in metropolitan, suburban, and regional areas, have reasonable access to PLT courses. Reasonable access in this context should include geographic proximity, the timeliness of undertaking the coursework, cost (including course fees, travel requirements, and accommodation), and any relevant learning requirements of the graduate. Rather than only allowing synchronous online delivery for exceptional cases per se, synchronous online delivery should be permissible where a graduate cannot reasonably access PLT coursework in person.
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? Such a review should be undertaken; however, in determining whether to prescribe any additional, or more rigorous, assessment processes in the PLT standards, the need to ensure that costs are reasonable for graduates should be kept in mind.
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? LFA does not provide comment.
Workplace experience	
7.1	Do you support the LACC retaining the requirement for a minimum of 15 days of workplace experience prior to admission? Yes.
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? Yes, although to allow for appropriate flexibility, it would seem reasonable for the hours to be allocated to tasks be indicative, rather than prescriptive, or to be included as a

	range, or both.
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? The development of additional guidance may be of assistance to supervisors, and LFA is happy to contribute to its preparation.
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? Any supervisor training should be optional, rather than mandatory. Mandatory training may be unnecessary for many lawyers, and in any event, would likely be a disincentive for some firms from taking on graduate lawyers.
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? For the reasons stated at 10.1, any training should be optional. Such training may be delivered by way of a CPD course.
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? Yes, it is appropriate that a PLT provider be permitted to approve workplace experience that a student has undertaken during their law course as satisfying the PLT workplace experience requirements. This is provided that the student can, as is suggested in the consultation paper, demonstrate that the workplace experience met the requisite PLT standards.
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? Yes, in consultation with PLT providers.

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? PALT reflects the idea that practice-area-specific training is most effectively delivered after admission, when early career lawyers are working in a real practice environment and can immediately apply the skills they develop. This approach better recognises that practical legal skills are acquired progressively and in context. The proposed 15 hours per year over the first two years appears reasonable and should not impose an undue burden on early career lawyers or their employers, particularly given that PALT would replace the substantially greater number of hours currently allocated to practice area training within PLT. It will be important to ensure that the total regulatory training burden on early career lawyers (including PLT, PALT, and CPD) is considered holistically and does not become disproportionate. Many large law firms already invest significant resources in structured, practice-area-specific graduate training programs. Careful consideration should be given to how existing employer-delivered graduate training and CPD programs can be recognised for the purposes of meeting PALT requirements, to avoid unnecessary duplication and cost (see response to question 15.1 below.)
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. Implementing PALT as a condition on practising certificates is a workable mechanism and is likely the most effective means of ensuring compliance. The existing supervised legal practice condition already operates in this manner, and practitioners and regulators are familiar with the framework. It also provides a clear incentive for completion, as failure to satisfy the condition would prevent a lawyer from obtaining an unrestricted practising certificate. In designing the implementation framework, regulators should ensure that the administrative requirements for demonstrating compliance are not unduly burdensome for either early career lawyers or their employers. A streamlined reporting and verification process should be developed. In particular, where an employer has delivered PALT or PALT-equivalent training under an approved or exempted program (see response to question 18.1 below), it should be sufficient for the employer to certify completion directly to the regulator.
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? LFA does not provide comment.
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? The flexibility for PALT to cover a broad range of practice areas (rather than being confined to the limited elective options currently available in PLT) is a significant

	advantage of the proposed model. The consultation envisages that PALT may be offered by law firms or groups of law firms, among other providers, subject to certification by the relevant law society. Many large law firms already deliver extensive, structured, and high-quality practice-area-specific training to their graduates as part of proprietary training and development programs. These programs are designed by experienced practitioners, are directly relevant to the firm's areas of practice, and often improve upon what external PALT providers would be able to offer in terms of practical specificity and depth. The proposed approval framework should not, however, require large employers to meet the same accreditation standards as educational institutions to have their existing training recognised. This would be disproportionate and could discourage employers from seeking formal recognition of their programs, leading to duplication where graduates must complete both their firm's internal training and separate externally provided PALT. LFA strongly recommends that the framework include a separate, streamlined pathway for legal employers to have their training programs, subject to any necessary modifications, approved for the purpose of satisfying PALT requirements. This could take the form of an employer accreditation or exemption mechanism, under which the relevant regulator approves the employer's program as meeting PALT learning outcomes, without requiring the employer to satisfy the full suite of accreditation standards applicable to external education providers. The criteria for employer program recognition could focus on the substance and quality of the training content, the qualifications and experience of those delivering the training, and the inclusion of appropriate assessment (see response to question 19.1 below). In relation to the question of who identifies and develops the PALT areas, large employers delivering PALT should have a meaningful degree of flexibility in identifying and designing the areas and content of their training. Firms structure their graduate training to reflect the way they organise and deliver legal services, which may not correspond to a standardised list of practice areas. For example, some firms may organise training by reference to client sectors, transaction types, or regulatory domains. This approach produces training that is directly relevant to the work that graduates are actually performing. A rigid, pre-determined list of PALT practice areas would be unlikely to reflect the diversity of ways in which legal practice is organised, and training is delivered across the profession. Such inflexibility could result in a poor fit between the mandated areas and the genuine training needs of early career lawyers. Rather than mandating a fixed taxonomy of practice areas, we suggest that the framework set out the learning outcomes and competency standards that PALT must achieve, while allowing providers (including employers) the flexibility to design courses that meet those outcomes within their own practice structures.
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? The flexibility to choose whether to complete PALT in one practice area or across up to four different practice areas is a key strength of the model. It allows lawyers who are already working in a specific discipline to deepen their expertise in that area, while also accommodating those who wish to explore multiple practice areas in their early career. This approach also aligns well with the reality of graduate programs at large firms, where graduates may rotate through several practice groups during their first

	two years. The ability to complete PALT modules in different practice areas would complement such rotational structures. Careful thought needs to be given to how modules are designed in practice and the relationship between depth and breadth. As a practical example, if a lawyer completes all four PALT modules in a single practice area, such as family law, it is presumably intended that those four modules cover different aspects or sub-disciplines of family law in progressively greater depth. Conversely, if a lawyer completes only one module in family law and the remaining three in other areas, is that single family law module a condensed introductory overview or is it one of the four deeper modules that a specialist would take? These are different courses designed for different purposes. The Committees should consider whether the design of modules should differ depending on whether a lawyer is undertaking a single module in an area (requiring a broader foundational overview) or multiple modules (allowing for progressive depth and specialisation). LFA also suggests that the framework allow for PALT modules to be developed in areas relevant to the type of practice, not only subject-matter specialisations. As the consultation paper acknowledges, PALT modules targeted at lawyers working, for example, in large commercial firms, in-house legal teams, government legal roles, or community legal centres, would be of considerable practical value.
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? LFA does not support imposing additional practice restrictions on lawyers who are undertaking PALT, beyond the existing requirement that lawyers be supervised for at least their first two years of practice (and the restrictions that flow from that requirement) in a uniform manner. Imposing additional restrictions: may be impractical in the context of large law firm practice, where graduates work under close supervision, within established team structures and existing risk management frameworks, and; may unnecessarily restrict the exposure of early career lawyers to substantive legal work, thereby impeding their development.
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? As noted above at 5.1, LFA recognises the pedagogical and relational benefits of face-to-face practical skills training, including the opportunity for early career lawyers to build networks with peers in their practice area. The exception for synchronous online delivery, however, should not be confined to exceptional circumstances per se, but should be available in a broader range of situations. This should include where participants cannot reasonably access PALT courses for their desired subject matter in person, where scheduling constraints make attendance impracticable, or where the employer is delivering PALT as part of an approved internal program across multiple office locations. For example, a more restrictive approach to the delivery of PALT courses may create logistical difficulties for firms with offices across multiple jurisdictions. It would be impractical for the delivery of a specialty PALT course by a practice group leader based in Perth for either: the practice group leader to travel to each office of the firm to deliver the course in program, or; for the firm to fly all early career lawyers undertaking

	that course to Perth. Where PALT is delivered by an employer under an approved program, the approval should provide the employer with the flexibility to determine the appropriate mode of delivery, provided that the training is interactive and facilitates genuine skills development. This would also ensure consistency of training for early career lawyers, increase the ability of senior lawyers to provide PALT (by reducing the need for travel or substituting instructors, where appropriate), and reduce costs for firms. LFA also reiterates the importance of national consistency of PALT standards, and mutual recognition of PALT accreditation.
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? LFA supports the principle that PALT content and providers should be subject to appropriate quality assurance and oversight by the relevant regulator. It is important that PALT is not a mere box-ticking exercise, and that the profession and clients can have confidence in its outcomes. The approval and accreditation framework must be carefully designed to accommodate the different types of entities that may deliver PALT. The consultation paper acknowledges that PALT may be offered by law firms or groups of law firms, in addition to law societies, PLT providers, universities, and public sector agencies. The NSW Legal Profession Admission Board Interim Report similarly envisages that PALT courses could be offered by law firms or groups of law firms, subject to accreditation. A uniform accreditation framework designed primarily for external education providers would be inappropriate and disproportionately burdensome for legal employers who wish to deliver PALT. Instead, the framework should incorporate a distinct, streamlined accreditation or recognition pathway for employer-delivered PALT programs. Under this pathway, the regulator would review whether: • the employer's proposed training programs meet the substantive learning outcomes required of PALT, • the training is proposed to be delivered by appropriately qualified and experienced practitioners, • the program includes some form of appropriate assessment (acknowledging that the form of assessment may differ from that used by external providers – see response to question 19.1), and • the employer has adequate arrangements to ensure the quality and consistency of the training. This employer recognition pathway would avoid the situation where large firms (which already have sophisticated training infrastructure) are required to meet the same accreditation standards as educational institutions or, alternatively, are forced to purchase external PALT courses that duplicate their own internal programs. An additional concern arises if PALT courses are required to be approved in each state and territory. Most large firms are national employers that deliver the same graduate training programs across all jurisdictions in which they operate. Requiring those firms to seek independent accreditation of their PALT programs in each state and territory would be an unnecessary and disproportionate administrative burden; both for the firms and for the regulators in each jurisdiction, given the potentially significant number of courses that may need to be assessed. LFA strongly recommends that the

	framework provide for a firm-level accreditation that is recognised nationally, so that an employer whose program is accredited by one regulator does not need to repeat the accreditation process in every other jurisdiction. A related and important practical question concerns the mutual recognition and interstate portability of PALT. Given the mobility of the modern legal workforce, it is essential that PALT completed in one jurisdiction be recognised in all others. For example, if an early career lawyer commences their first year of practice at a firm's Sydney office and then transfers to the firm's Brisbane office in their second year, PALT modules completed in New South Wales must be fully recognised in Queensland (and vice versa) without requiring the lawyer to repeat or supplement their training, or indeed to have their completed PALT studies assessed. The PALT framework should avoid any suggestion that PALT courses must be completed entirely within a single jurisdiction.
19.1	Do you support the proposal that PALT should incorporate rigorous assessment? Do you have any views on the parameters for this requirement? LFA supports that PALT should incorporate meaningful assessment to ensure that it delivers genuine learning outcomes. This is important for maintaining rigour and public confidence. The assessment framework must be carefully considered, however, for employer-delivered PALT programs. Whilst it may be appropriate for externally-provided PALT courses to include formal, graded assessment, the delivery of such assessments by employers to graduates raises significant issues. LFA suggests that the framework adopt a flexible approach to assessment that recognises different modes of demonstrating competence. For employer-delivered PALT, appropriate forms of assessment could include practical demonstrations of competence observed and assessed by supervisors, completion of work-based tasks or projects assessed against defined learning outcomes, or structured reflective exercises. The key principle should be that the assessment can demonstrate that the early career lawyer has developed the necessary practical skills and knowledge, rather than prescribing a single assessment methodology that may not be suited to all contexts. LFA also notes that the consequences of failing a PALT assessment requires careful consideration. The framework should provide a clear pathway for remediation and re-assessment for practitioners that fail an assessment, and the implications for the practitioner's practising certificate conditions should be proportionate and clearly communicated in advance.
Clinical legal education	
20.1	Do you support the Committees considering options for the inclusion of clinical legal education as a component of PLT? LFA does not provide comment.
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 optional, rather than mandatory. This is particularly so in circumstances where there the supply of clinical legal education positions may not meet demand in a timely manner.
20.3	If clinical legal education is optional, should completion of clinical legal education satisfy the requirements for PALT? LFA does not provide comment.
20.4	Who should be responsible for delivering and supervising clinical legal education? LFA does not provide comment.
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? LFA does not provide comment.
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? Any additional guidance concerning best practice is welcomed. LFA would be happy to contribute to the development of such guidance.
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? The establishment of a working group is appropriate, but its membership might benefit from including employers and senior practitioners. LFA would be happy to participate. Particular care needs to be taken in respect of regulatory reform. It is important that the nature of any new requirements, such as mandatory supervision reports, structured training plans, and performance assessments, are not so onerous as to act as a disincentive to firms taking on graduate lawyers. This may be an issue for certain practices in regional and rural areas.

<table>
<tr><th colspan="2">Implementation timing</th></tr>
<tr><td>22.1</td><td>Do you support the proposed transitional arrangements and implementation timeframe set out at Proposal 22?

It is sensible to implement a new PLT framework at the start of a calendar year, or for changes to law courses, at the start of the academic year. 2028 would be the earliest possible year to do so, and it is commendable that PLT stakeholders are working to address identified issues with the extant PLT framework as quickly as possible.

Commencement in 2028 should not be immutable, however, where a reasonable delay would better ensure some, or all, of the following outcomes:

1. that graduates have reasonable access to both the new PLT course and PALT courses at a reasonable cost from the commencement of any changes,

2. that PALT providers, including employers, have sufficient time to develop, resource, and have PALT courses approved by the relevant body in advance of a PALT framework commencing,

3. regulators have sufficient time to implement accreditation frameworks, and

4. that national consistency in training and admission is maintained.</td></tr>
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