

Leo Cussen Centre for Law

Submission to the Legal Admissions Consultative Committee Review of Practical Legal Training

In response to the Consultation Paper of April 2026
May 2026

Leo Cussen Centre for Law welcomes the opportunity to respond to the Legal Admissions Consultative Committee's (LACC's) review of Practical Legal Training (PLT). We strongly support reform that enhances graduate capability, ensures public confidence in the competence of new lawyers, and achieves national consistency across jurisdictions.

As a long-standing national provider of PLT and CPD, undertaking this work since 1972, Leo Cussen offers this submission to support improvement that is practical, equitable and in the public interest. Our response addresses the feasibility, quality and policy implications of the proposed model, drawing on extensive experience working with all university law schools across Australia and thousands of graduates each year.

Respondent details

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Are you responding as (select one):

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

Jurisdiction (select one)

- ☒ National
- ☐ Australian Capital Territory
- ☐ New South Wales
- ☐ Northern Territory
- ☐ Queensland
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Your submission will be shared with the Admissions Committee and the Law Admissions Consultative Committee and may also be shared with the Legal Services Council.

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

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

- ☒ Yes
- ☐ No

Responses to consultation questions

Law courses	
1.1	Do you support the proposal for the LACC to amend the Accreditation Standards for Australian Law Courses to require law courses to demonstrate how they have included practical teaching and training of the practical skills identified at Appendix F, with appropriate assessment? No. It is not clear that LACC has the authority to amend these accreditation standards. The implementation of changes set out in Appendix F requires legislative amendment not simply an amendment to the Accreditation Standards. Further, this question assumes that Appendix F adequately articulates the ‘practical skills’ required for entry level lawyers. This assumption needs to be further interrogated as it is not clear that the Appendix F skills are sufficient clearly described for academic purposes, nor that they adequately reflect the level reasonably required at law school (as opposed to immediately prior to admission). In the event that these impediments can be overcome and legislative amendment allows an amendment to the Accreditation Standards, then a requirement for law courses to demonstrate how practical skills are taught and assessed in accordance with the amendments would logically follow, and be of assistance for developing PLT curriculum. This may improve alignment between academic legal education, PLT and later stages of professional formation. Critically, the law degree should not be expected to replicate PLT or supervised legal practice. Its role is to provide structured, AQF Level 7 developmental and assessable preparation at the academic stage of training. In that sense, the reform is best understood as strengthening the foundations of professional capability, not collapsing the distinction between university legal education and post-degree practical training.
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? Yes. We suggest some amendments to Appendix F to make it clearer and more workable. 1. the schedule should distinguish more clearly between broad skill domains, the legal tasks in which those skills are exercised, and the level of performance expected at law school stage. Those categories are often

	collapsed together, which can make curriculum design and accreditation mapping less clear and much more difficult than they should be. 2. the schedule should state expressly that the required level is a threshold academic standard, not the standard expected after PLT or supervised legal practice. That clarification is important to ensure the schedule is rigorous but realistic. 3. Appendix F would benefit from a stronger emphasis on integrated capability. Skills such as interviewing, advocacy, drafting, negotiation and advice writing should not be treated as isolated items only. They are better understood as contexts in which broader abilities are combined, including legal analysis, communication, ethical judgment, research and professional decision-making. A strong argument can be made that these skills should be left to further develop in PLT. 4. express reference to ethical judgment in context, not simply ethics as abstract doctrinal knowledge. 5. express reference to digital capability (including AI) as an essential part of contemporary legal practice. 6. the schedule should support curriculum-wide integration rather than a rigid subject-by-subject checklist approach.
1.3	Would law schools be able to implement these changes by the beginning of the 2028 academic year, as proposed? Leo Cussen will defer to Australian law schools to advise as to the timing for the implementation of any agreed national changes. We find it concerning that the changes as developed by the NSW LPAB's proposed model are assumed to be the changes that will need to be implemented when the consultation process has not yet been conducted, and no national agreement has been reached. We do note that , whenever law schools may be able to implement whatever regulatory changes are determined, there would necessarily be a lag time between students undertaking the amended university law courses, and those same students getting to PLT. Therefore any PLT changes would commence later than the law school changes. In addition, there would need to be transitional arrangements made for up to 11 years (the maximum permissible period for a student completing a double degree at any Australian university) to accommodate and include all students who might be enrolled at the time the changes commence.
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? There does not appear to be sufficient evidence to support Appendix F as the appropriate articulation of practical skills and knowledge required at the time of admission.

	It is our submission that further consultation is required to be undertaken with all relevant stakeholders to determine the practical knowledge and skills required at the time of admission. Leo Cussen supports reform that makes the practical knowledge and skills required at admission clearer, more explicit and more assessable. However, the change should not simply replace one checklist with another. The standards should be framed around integrated professional capability, with skills demonstrated through recurring legal tasks and assessed against threshold entry-level performance. Such reform would better support defensible judgments about readiness for supervised practice.
2.2	Do you suggest any amendments to the categories or skills set out in the skills schedule at Appendix F? Yes. The schedule should distinguish more clearly between: • broad professional skill types; • the legal tasks in which those skills are exercised; and • the level of performance of the skills expected at admission. A more workable structure would organise PLT around cross-cutting domains such as analytical reasoning, written communication, oral/interpersonal performance, ethical judgment, matter management, and evidence-based decision-making. This would reduce topic-list drift and better reflect how legal capability is actually formed in practice.
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? Yes. This should be included within client communication, interviewing, advice and professional judgment. An additional and specific requirement for working with Indigenous Australians ought to also be included. ii. Preventing and addressing sexual harassment? Yes. This should be expressly included as part of professional responsibility and workplace conduct. iii. Awareness of obligations under anti-money laundering/counter-terrorism financing regulations? Yes, at least at an awareness level, particularly in relation to client intake, compliance and office systems.

	iv. Awareness of ADR options, or specific skills relating to ADR? Yes. Both awareness of ADR pathways and some practical ADR-related skill development should be included. v. Negotiation skills in a wider range of settings, or other specific settings? Yes. Negotiation should be framed broadly across civil, commercial, regulatory and criminal contexts, not confined to one setting. vi. Drafting any other types of legal documents? If so, what types of documents? Yes, but selectively. Priority should be given to transferable drafting tasks such as file notes, client advice letters, settlement communications, simple contracts, simple pleadings, affidavits or witness statements, and opponent or regulator correspondence.
2.4	Should the option for graduates to undertake Supervised Workplace Training as a way of completing PLT be retained? Yes, but with stronger safeguards, as there is potential for inconsistency such that it may be too variable to operate as a reliable substitute for structured professional formation. If retained, the standard must attain the same level as the more formal PLT training.
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? Core areas should still be delivered and assessed through approved provider teaching or programmed training, especially: - ethics and professional responsibility, - trust and practice systems, - structured interviewing, - advocacy foundations, - legal writing, and - assessed threshold performance tasks.
2.6	Should there be any other amendments to Supervised Workplace Training? There should be clearer expectations around supervision quality, structured training plans, evidence requirements, provider oversight, and moderation. SWT should operate as a structured and assessed part of professional formation.
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? No. A four-week minimum is too compressed if PLT is to function as a serious pre-admission site of professional formation. It risks reinforcing a narrow compliance model rather than allowing sufficient time for preparation, guided practice, integration, feedback, reflection and performance across core skills. A better model is a staged structure in which online preparation, worked examples, drafting and checkpoint tasks are followed by live intensive application and supervised performance. It is critical that any proposed structure be informed by current evidence-based teaching and learning practices. Professional capability can only be developed progressively through repeated cycles of preparation, integration and applied performance. A four week timeframe does not allow for this across the essential professional skills areas.
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? It is too short. Even if law courses and post-admission supervision take on a more significant skills development role, a 4-week PLT course will not provide enough time for scaffolded practice, feedback, integration and defensible rigorous assessment.
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? No. Removing award qualification benchmarks would be a significant mistake. PLT is not merely a short transitional course or an administrative prerequisite to admission. It is a high-stakes pre-admission stage in which doctrinal legal knowledge is meant to be converted into assessable professional capability. If that function is taken seriously, there is a strong case for retaining PLT at AQF Level 8 or an equivalent standard. AQF 8 matters because it signals that PLT is not basic vocational familiarisation, but advanced post-degree professional formation requiring the application of knowledge and skills with autonomy, judgement and responsibility. That level logic is well suited to the threshold expected of an entry-level lawyer entering a regulated profession. The proposal is also problematic because it risks weakening external quality assurance at precisely the point where public confidence should be strongest. Where PLT is delivered as a graduate diploma within the higher education framework, TEQSA and the Higher Education Standards Framework provide an important layer of external oversight in relation to course design, learning

	outcomes, assessment, governance and quality assurance. That does not eliminate all quality concerns, but it does provide a recognised regulatory structure within which standards can be monitored and defended. Removing the graduate diploma level or equivalent risks detaching PLT from that external architecture and leaving too much to provider-level assurance alone. In a field as important as admission to legal practice, that would be a backward step. This matters because LACC's standards operate in the public interest. They are part of the admissions framework through which the profession represents that newly admitted lawyers have reached a threshold of competence sufficient to begin practice safely under supervision. In that context, lowering or removing the AQF 8 benchmark risks sending the wrong message about the seriousness, level and regulatory significance of PLT. It would tend to diminish PLT at the very moment when reform should be strengthening its coherence, defensibility and standing within the overall pathway to admission. If anything, the direction of reform should be the opposite. PLT should be more clearly recognised as a rigorous AQF 8 professional formation program, supported by strong assessment, visible standards of performance and credible external quality assurance. Abandoning the graduate diploma level or equivalent would dilute that position and is not supported.
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? Leo Cussen does not support this proposal. Should LACC determine that the PLT Standards be amended to do away with the AQF 8 or equivalent requirement, the LACC framework should include much, much stronger quality assurance measures, including: - clearer outcome standards, - stronger assessment requirements, - moderation and calibration, - external review, - better recordkeeping, - clearer governance around assessment quality and continuous improvement, and - a proper compliance mechanism clearly articulating standards enforcement and review.
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? Leo Cussen does not support this proposal.

	The question as framed fails to appreciate contemporary teaching and learning systems, student demand or techniques for self-paced learning such as flipped classroom delivery. Assuming that pre-class preparation can be delivered and completed online, we support interactive delivery for core skills components- particularly those that demand higher order assessment artefacts or performative outputs. The key issue is not physical presence alone, but whether the delivery mode supports active participation, feedback, observed performance and professional interaction. Core performance-based learning should therefore occur in person or through synchronous delivery, with asynchronous content used for preparation.
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? Yes. Assessment is central to the legitimacy of PLT as a pre-admission stage. The Standards should require authentic and integrated tasks, clear threshold criteria, multiple forms of evidence, moderation and calibration, and stronger alignment between assessment and the capabilities the framework is intended to assure.
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? Yes. Greater clarity would improve consistency, fairness and transparency. Because PLT sits within the admission framework, academic misconduct in PLT has particular significance and should be recorded and reported in a more consistent and intelligible way.
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. Leo Cussen has always been accredited to provide the minimum of 15 days workplace experience (20 days in Western Australia) given the practical nature of the course. It serves as an essential and integrated component of the PLT course, allowing students an opportunity to apply what they have learned through the PLT course to real-life practice.
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. We strongly support providing more guidance in the Standards, however, as stated previously, Leo Cussen is concerned at the assumption that the skills as articulated in Appendix F are sufficient, appropriate, evidence-based or clearly set out. This needs to be addressed before additional guidance can be provided.
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? Yes. To support this effectively, it will be important to undertake national stakeholder mapping to ensure that the guidance developed is informed by, and relevant to, the full range of legal practices offering professional placements.
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? Yes. The ability to effectively supervise professional development is not innate, it is developed through training and experience. To support consistency and quality of supervision, it is therefore important that supervisors are appropriately trained. This will be particularly critical if there is to be increased reliance on post-admission training.
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? Yes (see 10.1 above). The training should include: - How to give effective feedback to achieve the educational purposes of supervised practice; - Ethical supervision practices incorporating managing power differences and establishing appropriate professional boundaries; - An understanding of the skills and knowledge acquired through PLT prior to admission, in order to assist new lawyers to apply and build their professional skills in practice; - Wellbeing systems for supervisors and new lawyers; and - Effective delegation and work allocation.

	The training could be delivered through an accredited supervisor course which could carry CPD points.
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? Work experience undertaken while studying, while incredibly valuable, does not replace the need for structured workplace experience during PLT. This is particularly so where that experience is obtained in the early years of a law course, creating a lag between the work experience and PLT. PLT work experience provides the opportunity to reflect on and apply the professional and practical skills learned during the PLT course. This opportunity is missed if the work experience component is undertaken while studying a law course. If work experience undertaken during a law course is taken ‘for credit’ towards the law degree, it should not also be used for PLT purposes. If such an amendment occurs, there should be significant safeguards and requirements imposed on workplace experience undertaken while studying, including: - eligible workplace experience should be limited to the final year of the law course to ensure sufficient legal knowledge to apply, reflect and benefit from the experience; - workplace supervisors are trained in the educational purpose of the work placement, and can certify that appropriate legal work was undertaken; and - the workplace experience is of an equivalent standard to PLT-level work experience rather than general administrative work in a legal workplace. PLT providers could approve such workplace experience. Ideally this should occur prior to the student commencing the workplace experience, rather than retrospectively, to ensure that the criteria are met.
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? No. Not every PLT provider has the resources to assist students to source PLT workplace experience opportunities.
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? No. Leo Cussen does not support this requirement if 15 hours/year of ‘PALT’ across the first two years of legal practice is intended to be a substitute for the current approximately 150 hours of training currently provided through the electives in PLT and other PLT course reductions. This would be far too short, particularly if it is delivered outside a regulated and structured learning program. 30 hours is manifestly insufficient when compared to the opportunity for and volume of skills training offered through PLT courses and the increasing range of skills new lawyers require. The proposal does not allow sufficient time for appropriate assessment of the skill development, which does not appear to have been considered in the suggested 15 hours per year (see our submission at 19.1 below). Reforms to PLT should be moving towards more rigorous assessment as submitted above at 3.1, 4.1, 4.2, and 6.1. Although these points refer to pre-admission training, insofar as PALT is intended to replace existing components of PLT, the importance of rigorous and effective assessment is equally applicable. The proposal poses a particular risk for junior lawyers in RRRR areas, or those in small firms and legal centres, who frequently assume significant responsibility very quickly, and where significant supervision and training is not available. The risk flows through to the practice, the public and potentially legal insurers. It is quite common that lawyers in small firms need to pay for their own CPD. The additional 15 hours/year will place an unfair burden on the lowest paid practitioners. It is not enough to say that such training is tax-deductible, as it doesn’t account for the stress for additional out-of-pocket expenses. Consideration needs to be given to part-time employment, and whether the requirement would be on a pro rata basis, or if the proposed 30 hours need to be completed within the first two years of practice. If the latter, this would disproportionately affect part-time employees on lower incomes. Further, we note that the proposal assumes that newly admitted lawyers are able to find legal employment that would provide supervision and the opportunity to complete ‘PALT’. There appears to be no consideration of newly admitted lawyers who are not employed, or employed in policy or other related areas where legal supervision may not be available. This would have a detrimental impact on their career progression.
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.

	Leo Cussen does not support the requirement for 'PALT' as set out in the proposal.
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? No. We do not support this proposal. If 'PALT' is intended as a necessary substitute for a truncated PLT course, being the foundational skills needed for practice as an Australian lawyer, it is illogical to suggest that Barristers do not also require these foundational skills. Further, given the jurisdictional differences across Australia, the capacity for practitioners to move jurisdictions during their career, and the desirability of a national profession, it is critical that a common foundation exists nationally.
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? No. If the skills and practice-area training is removed from PLT, the 'PALT' replacement must be designed and developed to coherently build on the skills acquired pre-admission. Inconsistent and uncoordinated training will adversely affect the competence and reliability of early career lawyers.
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? Leo Cussen does not support the proposal of PALT in only one practice area, as such an early and limited specialisation risks early career lawyers, who frequently move firms and jobs, being significantly under-prepared for the range of skills and knowledge required for practice. This risks particularly disadvantaging small, regional and community-based practices who may find that they have recruited junior practitioners who do not have the breadth of skills and knowledge that ought to be expected.
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? Leo Cussen does not support the proposal that 'PALT' is a sufficient or appropriate alternative for a significant component of PLT. In the event that 'PALT' is implemented, the limited PLT program proposed would necessitate significant and carefully

	considered restrictions on early career lawyers to make up for a lack of preparedness for practice. Further work with educational providers and the spectrum of the profession would be required to determine what kind of restrictions would be required, and could be practically implemented. Any such additional restrictions would have an impact on early career employment opportunities, mobility, and would likely have a detrimental effect on workforce supply in the already under-supplied legal assistance sector, especially in RRRR regions.
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? Leo Cussen does not support the proposal that 'PALT' is a sufficient or appropriate alternative for a significant component of PLT. If 'PALT' were to be adopted, Leo Cussen does not support the proposal that it be delivered in person or that synchronous online delivery only be available in exceptional circumstances. Synchronous online delivery is an effective, standard mode of delivering training and education. It ought not require any demonstration of 'exceptional circumstances'. The requirement for in-person delivery, as with PLT, significantly disadvantages anybody outside or even on the fringes of capital cities, or anybody who may not have the capacity to travel to attend training.
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? Leo Cussen does not support the proposal that 'PALT' is a sufficient or appropriate alternative for a significant component of PLT. If the proposed model were to be adopted it would be essential for the content and providers of 'PALT' be accredited by the relevant regulator in each jurisdiction as is the requirement for the current PLT courses. We note that this would place an additional regulatory burden on regulators, and likely bring additional regulating authorities into the process, as current admitting authorities may not have jurisdiction over post-admission professional regulation.
19.1	Do you support the proposal that PALT should incorporate rigorous assessment? Do you have any views on the parameters for this requirement?

	Leo Cussen does not support the proposal that 'PALT' is a sufficient or appropriate alternative for a significant component of PLT. If the proposed model were to be adopted, it would of course require rigorous assessment if it were to be a meaningful, useful educational endeavour, and have any regulatory weight. Mere attendance to indicate completion of 'PALT' would render the requirement useless. At a minimum the assessment parameters have to reflect: - clearly articulated outcomes of the 'PALT' training; - appropriate demonstration of the level and type of skills, knowledge and professional judgement required; and - realistic practice contexts and practice-based assessments.
Clinical legal education	
20.1	Do you support the Committees considering options for the inclusion of clinical legal education as a component of PLT? Clinical legal education is an incredibly valuable educational opportunity for practical skills acquisition. However, clinical legal education cannot be seen as a substitute for structured PLT undertaken after graduation. Participation in clinical legal education: - is undertaken at undergraduate level, with the appropriate mix of skills and responsibilities; - covers an enormous range of potential work; - varies greatly not only between institutions, but between clinics; and - given the cost of running quality clinics is often reliant on insecure funding and has limited places and finite supervisor resources. For these reasons, although clinical legal education may be of assistance in incorporating legal skills training at an undergraduate level, it cannot replace the structured PLT programs offering the opportunity to learn, practice, receive feedback , repeat and be assessed on essential professional practice skills.
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 Leo Cussen does not support making clinical legal education a mandatory component of PLT. Clinical legal education is not available to all students across all universities. Clearly making it mandatory would lock out those students who have no access to clinical legal education from completing their PLT.

	Law students in small universities and in regional, rural or remote areas would be significantly disadvantaged due to far fewer clinical legal education opportunities. In the event that clinical legal education is made a mandatory component of PLT, students that are fortunate enough undertake clinical legal education for credit as part of their law degree should not be entitled to get credit for PLT purposes. This kind of 'double-dipping' on credit does not take into account the very different stage and type of training that is possible at an undergraduate level compared to immediately pre-admission. It also unfairly disadvantages those students not able to undertake clinical legal education during their law degree.
20.3	If clinical legal education is optional, should completion of clinical legal education satisfy the requirements for PALT? No. Clinical legal education is undertaken at an undergraduate level during a law course. Subsequent to this, law graduates study a PLT course. Subsequent to this, if they successfully complete PLT, a law graduate may apply for admission. If they are admitted to practice, and obtain employment as a legal practitioner, only then would they be able to undertake 'PALT' (should that model be adopted). It would serve no useful, sensible or logical educational purpose to approve an undergraduate clinical legal education program as meeting the needs and outcomes of a professional training course for new lawyers.
20.4	Who should be responsible for delivering and supervising clinical legal education? As is currently the case, the accredited institution offering clinical legal education is the only institution that could be responsible for delivering and supervising that clinical legal education. If this question assumes that clinical legal education should form part of PLT, we note that Leo Cussen does not support making clinical legal education a mandatory component of PLT, nor a replacement for post-graduate PLT.
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? Leo does not support making clinical legal education a mandatory component of PLT. If it was determined that clinical legal education were to be part of PLT, Leo Cussen agrees that it would be essential to have a group of suitably qualified experts explore how this might be undertaken.
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? Leo Cussen does not support the proposal that 30 hours of 'PALT' is a sufficient or appropriate alternative for a significant component of PLT. However, Leo Cussen does strongly support the need for additional training and guidance for supervisors of early career lawyers to improve supervision. There is currently no mandatory training or support for supervisors, leading to inconsistent quality, outcomes and experience. Currently, early career supervision is as variable as the old articulated clerk system. To improve upon that, additional training is required.
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? Leo Cussen does not support the proposal that 30 hours of 'PALT' is a sufficient or appropriate alternative for a significant component of PLT. However, whether such a proposal is adopted or not, Leo Cussen supports the establishment of such a working group.
Implementation timing	
22.1	Do you support the proposed transitional arrangements and implementation timeframe set out at Proposal 22? No. The proposed transition period appears not to take into account the range, complexity and interdependency of the many moving parts across different jurisdictions that such extensive changes would require. The multi-faceted changes include: - law degree redesign and accreditation; - PLT redesign including length and content; - PLT reaccreditation across each jurisdiction; - design of the content and regulation of 'PALT'; and - extensive training and support of supervisors to carry the additional obligation of the profession. These are all interdependent. Changes to one cannot be designed, much less implemented, unless all are agreed. Changes to one would undo the design and implementation of the others. As these elements are not currently a single coherent system, there is no framework to prepare for this level of complex implementation. Much greater consultation is required to assess feasibility, much less the potential timing for implementation.

	The proposed transitional arrangements fail to adequately and fairly make provision for students and graduates who get caught in the middle of any changes. There are many potential stages at which this could happen, as students take breaks; study part-time; change institutions; have a gap between completing PLT and commencing practice. None of these circumstances are adequately provided for. The implementation timetable also fails to make provision for evaluation of the model. There is no proposal to pilot the model, or other models, and evaluate their efficacy in reaching any articulated outcome, both generally and in relation to jurisdictional and regional variations. In summary, the proposed timing is both risky and unrealistic.
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