

Legal Practitioners Admissions Board

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27 May 2026

Mr Stephen Bray
A/ Chief Executive Officer, Legal Services Council
A/ Commissioner for Uniform Legal Services Regulation
PO Box H326
Australia Square NSW 1215

By Email: Stephen.Bray@legalservicescouncil.org.au

Dear Mr Bray

Re: Consultation Paper – Review of practical legal training

I refer to your email of 2 April 2026 inviting a submission by the Legal Practitioners Admissions Board in response to the Committee's proposed reforms to practical legal training.

The Board thanks the Committee for the opportunity to provide feedback to the proposal, and is pleased to do so. The Board's completed Feedback Form is **attached**.

As you know, under Queensland legislation the Board makes recommendations to the Supreme Court as to the fitness and eligibility of applicants for admission to the legal profession and (with the Chief Justice) approves academic qualifications and practical legal training programs for admission to the legal profession under the *Legal Profession Act 2007* (Qld). In consequence although, with one exception, the Board is comprised of practicing solicitors and barristers, the responses in the Feedback Form are those of the Board as a statutory body, reflecting the limitations on its statutory functions and powers. No doubt more comprehensive responses will be forthcoming from regulatory bodies such as the Queensland Law Society and its counterparts.

In addition to the Board's specific responses in the Feedback Form, it is considered appropriate to make the following observations, by way of overview:

1. Board members, especially those practicing as solicitors, are aware, both from personal experience and anecdotally, of shortcomings with current PLT programs. The Board considers that a review of PLT programs, as is being undertaken through the Consultation Paper is both warranted, and necessary.
2. The Board supports the adoption of uniform standards and the achievement of uniform outcomes and is willing to work cooperatively to that end.

3. The Board is conscious that law schools and PLT providers in Queensland are located in only a few centres, mainly along the east coast. The Board is concerned to ensure that PLT programs are delivered effectively to regional, disabled and other disadvantaged students and that any changes that may be adopted (in particular, for example, with respect to the delivery of PLT coursework the subject of Proposal 5.1) ensures equitable access by such students.
4. The proposed reforms to PLT, including embedding PLT skills within law courses, should also address the provision of PLT to law graduates and/or legal practitioners who have completed law degrees in common law jurisdictions overseas and are seeking to be assessed under the Uniform Principles.
5. Finally, the regrettable fact is that the number of applicants for admission disclosing incidents of academic misconduct continues to increase year on year. Moreover, academic misconduct may, and does, take many forms. As noted in the Board's response to Proposal 6.2, the Board supports the adoption of uniform standards by law schools and PLT providers with respect to the recording and reporting of such incidents in student conduct reports; the categorization of the seriousness of academic misconduct in its various manifestations; and the penalties to be imposed in respect of each such category, the object being to better ensure consistency among law schools and PLT providers with respect to these matters.

The Board looks forward to the opportunity of further contributing to the consultation process following the Committees' receipt and consideration of responses from regulators, other admitting authorities and professional organisations.

Yours faithfully



GRAHAM GIBSON KC
Chair
Legal Practitioners Admissions Board

Feedback Form: Review of practical legal training

Respondent details

Name: Graham Gibson KC

Organisation (if applicable): Legal Practitioners Admissions Board (Qld)

Contact details: Ms Melissa Timmins (Secretary to the Board) Email: [REDACTED]

Tel: [REDACTED]

Are you responding as (select one):

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

Jurisdiction (select one)

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

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

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

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

- ☒ Yes
- ☐ No

Responses to consultation questions

Law courses	
1.1	Do you support the proposal for the LACC to amend the Accreditation Standards for Australian Law Courses to require law courses to demonstrate how they have included practical teaching and training of the practical skills identified at Appendix F, with appropriate assessment? In principle, the Board does not oppose the teaching of practical knowledge and skills as part of Australian Law Courses. Support for the proposal would be conditional on law schools demonstrating their ability to include the teaching and training of the skills identified at Appendix F of the Consultation Paper, and further consideration of the likely practical consequences of the adoption of the proposal (including, but not limited to, whether adoption of this proposal would result in increases in the current duration and cost of law courses).
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? The Board does not suggest any amendments to the proposed skills schedule (Appendix F) to the Consultation Paper.
1.3	Would law schools be able to implement these changes by the beginning of the 2028 academic year, as proposed? The Board notes the responses of NSW law schools to the NSW LPAB (S. 6.9 of the Consultation Paper at p. 65) but is not itself in a position to comment on the ability of law schools to implement the proposed changes by the beginning of the 2028 academic year. Regardless of the commencement date, the Board notes that transitional provisions will need to be included –most likely corresponding with the current duration of law courses—to preserve students’ ability to complete law courses which do not include the proposed changes, and then to complete PLT as it currently stands.
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? In principle, the proposal to amend the PLT Competency Standards to reflect Appendix F is supported on the basis that the proposed PLT Competency Standards are included within law courses as well as being taught within the proposed shorter PLT coursework.
2.2	Do you suggest any amendments to the categories or skills set out in the skills schedule at Appendix F?

	The Board recognises that the categories and skills listed in Appendix F are comprehensive. Nevertheless, the Board proposes that consideration be given to including the following additional skills: (1) Ethics, Professional Responsibility—legal professional privilege; client confidentiality—its content and limitations; use of social media and contacts; (2) Generally—across many categories—use and misuse of AI
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? In principle, the Board supports the inclusion of the listed areas in the skills schedule. The Board is conscious, however, that the inclusion of all the listed areas will impose additional demands on teachers and students and may, to that extent, be impractical.
2.4	Should the option for graduates to undertake Supervised Workplace Training as a way of completing PLT be retained? In principle, the Board supports the retention of the option for graduates to undertake Supervised Workplace Training as a way of completing PLT. Also, it may be appropriate for supervised trainees to be offered an abbreviated version of the shorter PLT coursework as part of a traineeship (for example, only requiring completion of, for example, negotiating, drafting, and ethics) but not requiring completion of the 15 day PLT workplace experience.
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? In principle, subject to informed views of the profession, there appears to be no reason why all aspects of the skills schedule should not be able to be delivered by workplace trainers. As noted in the response to Proposal 2.4, it may not be necessary to require supervised trainees to undertake all of the tasks set out in the skills schedule. Completion of an abbreviated version may be sufficient.
2.6	Should there be any other amendments to Supervised Workplace Training?

	The Board does not propose any other amendments to Supervised Workplace Training. See response at 2.4 and 2.5 above
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? The Board notes that the proposal is to also incorporate the proposed skills within law programs which will enhance training received by students. However, the Board is unable to support the proposal to reduce PLT courses to a minimum of 4 weeks in length pending consideration of submissions from other stakeholders. The Board notes the proposals submitted by UNSW and UTS to the NSW LPAB (Annexure B to the Interim Report on PLT Reform of the NSW LPAB at p. 51 (UNSW) and p. 57 (UTS)), each of which casts doubt on the efficacy of a 4 week period. It is considered that the duration of the PLT course must be a <i>consequence</i> of the content to be delivered and the outcomes to be achieved, not a pre-determined period with which courses must be made to comply.
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? The Board repeats its response to Proposal 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? Ensuring the highest quality of PLT training is the paramount consideration. In consequence, the Board is presently unable to support this proposal, pending assurance that the removal of TEQSA oversight or the requirement for tertiary education providers to self-accredit will not result in a lowering of standards. The Board is not in a position to formulate alternative, or additional, quality assurance measures other than to reiterate the necessity for such measures if this proposal is adopted. The Board also notes that removing the requirement for a PLT course to be delivered at a post-graduate tertiary level will significantly impact students' ability to receive financial government assistance through FEE-HELP.
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? The Board notes that TEQSA has quality assurance oversight of tertiary courses and providers. Alternatively, some tertiary education providers are able to self-accredit in line with TEQSA requirements. This oversight provides wide-ranging regulation of standards across many areas. As noted in the response to Item 4.1, it is considered that in the absence of TEQSA oversight, further quality assurance measures will be required.
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? In principle, the Board supports the proposal that PLT Standards be amended to require that PLT coursework be delivered in person. The Board does not consider that synchronous online delivery should be confined to “exceptional cases” only, however. The circumstances that may prevent, or impair, regional students, students with disability, or others, from accessing coursework delivered in person are unlikely to be fairly characterised as “exceptional”. In principle, the Board’s support for this proposal is subject to appropriate safeguards to recognise and accommodate the difficulties likely to be experienced by students such as those referred to above.
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? The Board supports Proposal 6.1. The Board is not in a position to propose new, or alternative, Standards but is willing to consider and respond to proposals from the profession and others in that regard.
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? Incidents of academic misconduct are coming to the Board’s attention with increasing frequency. The Board considers that the adoption of uniform standards for the recording of such incidents by law schools and PLT providers; the penalties to be imposed by law schools and the reporting of such incidents to admitting authorities in student conduct reports, to be a matter of high priority, recognising the importance of consistency in the responses to such incidents by law schools, PLT providers and admitting authorities.
Workplace experience	

7.1	Do you support the LACC retaining the requirement for a minimum of 15 days of workplace experience prior to admission? The Board doubts that the proposed requirement for a minimum of 15 days of workplace experience will be sufficient. The Board is presently unable to support retaining the requirement for a minimum of 15 days workplace experience, pending the outcomes of this consultation process and a consideration of submissions received from, in particular, the profession, as to the appropriateness of that period. The Board is not in a position to propose a specific duration for workplace experience.
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? The Board supports Proposal 8.1.
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 Board supports Proposal 9.1.
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? The Board supports Proposal 10.1.
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? The Board is not in a position to comment as to the merit of this proposal. Professional organisations are likely to be better placed to inform a response.
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? The Board is open to supporting the amendment of 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.

	Critical to the Board's support of this proposal is the ability to impose requirements on the content of such work experience, the experience and skills of the person providing supervision, and certification of the approval of such work experience. PLT providers and/or professional organisations would appear to be best placed to certify that appropriate work experience has been undertaken.
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? The Board supports Proposal 12.1.
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? In principle, the Board supports Proposal 13.1 on the basis that any additional training will be beneficial to students. However, the Board does not have the information to enable it to be opine as to whether the proposed 15 hours annually for PALT is likely to be too long or too short. Professional organisations are likely to be better placed to comment on that issue.
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. Although the Board would support such a proposal in principle, professional organisations are likely to be better placed to comment on this issue.
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? In principle, the Board supports Proposal 14.1, but considers that the issue is likely to be better addressed by professional organisations.
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? Professional organisations are likely to be better placed to comment on this issue
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 Board supports Proposal 15.2 in principle, providing, as it does, flexibility to respond to the different circumstances of persons completing PALT. However,

	professional organisations are likely to be better placed to comment on this issue.
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? The Board does not have the information to enable it to be opine as to whether further restrictions should apply to a lawyer's ability to practice. It expects that professional organisations would be likely to be better placed to respond to this issue.
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? The Board does not consider it appropriate to respond to Questions 17.1, 18.1 or 19.1 as they concern aspects of the delivery of post admission legal training, which is not a matter in respect of which the Board has jurisdiction.
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?
19.1	Do you support the proposal that PALT should incorporate rigorous assessment? Do you have any views on the parameters for this requirement?
Clinical legal education	
20.1	Do you support the Committees considering options for the inclusion of clinical legal education as a component of PLT? In principle, the Board supports Proposal 20.1. However, the Board considers that clinical legal education may be more appropriately included within a law degree, as an element of the practical knowledge and skills (outlined in Appendix F) students are required to complete.
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 The Board has a preference for clinical legal education to be a mandatory component of the proposed PLT embedded within a law degree . In principle, the Board is of the view that if clinical legal education is a mandatory component of PLT embedded within a law degree, students should be entitled to credit for such education as part of a law degree.

20.3	If clinical legal education is optional, should completion of clinical legal education satisfy the requirements for PALT? The Board is not in a position to express a view on this issue. In principle, the Board recognises that, subject to further investigation, it may be appropriate to treat clinical legal education as satisfying the requirements for PALT, noting that it is presumed that any clinical legal education would be a pre-admission requirement.
20.4	Who should be responsible for delivering and supervising clinical legal education? If clinical legal education is to be a component of the proposed PLT embedded in a law degree whether on a mandatory or optional basis, the Board considers it should be delivered by law schools. Input from law schools and professional organisations will better inform a response to Question 20.4.
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? The Board supports Proposal 20.5.
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? The Board is not in a position to respond to this question. It will be informed by further information and advice from the profession as to the adequacy of guidance currently provided to supervisors of early career lawyers.
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 Board supports legal profession regulators reviewing the appropriateness of current levels of guidance to supervisors of early career lawyers and, if appropriate, the establishment of a working group as proposed.
Implementation timing	
22.1	Do you support the proposed transitional arrangements and implementation timeframe set out at Proposal 22? The Board supports transitional arrangements and implementation being effected as soon as is reasonably practicable in the circumstances, including the importance of achieving uniformity in any changes that are adopted. The Board is not in a position to comment as to the appropriateness of the timeframes set out in Proposal 22, however notes the comments set out in response to proposal 1.3.

