

Feedback Form: Review of practical legal training

Respondent details

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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.

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Preface – QUT’s position and the structure of this Submission

Queensland University of Technology (QUT) provides legal education and training across the full pre-admission continuum. QUT delivers an accredited undergraduate law course (LLB) through the School of Law, and an accredited Practical Legal Training (PLT) program. QUT is therefore in the position of speaking from both sides of the LLB–PLT interface that this consultation seeks to reshape.

QUT’s LLB and PLT are not delivered as an integrated program. They are, however, deliberately sequenced and articulated, with practical legal skills introduced and scaffolded through the law course and consolidated through PLT prior to admission. This submission speaks to that scaffolded handoff, and to the consequences of the proposals for it.

For coherence with the broader sector, this submission adopts the following positioning:

- On questions concerning the law degree (Proposal 1 and parts of Proposals 8–12, 20 and 22 to the extent they affect law schools), QUT endorses the submission of the Council of Australian Law Deans (CALD) and offers QUT-specific evidence and context.
- On questions concerning Practical Legal Training and Post-Admission Legal Training (Proposals 2–6, 13–19 and 21), QUT has reviewed and endorses the proposed submission of the Australasian Professional Legal Education Council (APLEC), the peak body for PLT providers.
- On questions concerning workplace experience, clinical legal education, supervision of early career lawyers and implementation timing, QUT’s position is set out below and is broadly consistent with both CALD and the proposed response from APLEC.

Responses to consultation questions

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? QUT supports, in principle, accreditation standards that require Australian law courses to demonstrate the inclusion and assessment of practical legal skills. QUT does not support the proposal as drafted, because the skills schedule at Appendix F is not the appropriate vehicle for that requirement.
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	QUT endorses CALD’s observations that the proposal would have substantial implications for curriculum balance, staffing and pedagogical autonomy, and that the design of the skills schedule reflects insufficient engagement with the substantial literature on the skills required of contemporary legal practitioners. The requirement, if it is to proceed, should attach to fundamental competencies expressed at a higher level of generality than the granular task-level skills currently set out in Appendix F. A particular concern is that Appendix F has been developed without reference to the existing national articulation of skills and learning outcomes for the Australian Bachelor of Laws – the Threshold Learning Outcomes (TLOs) for the LLB, developed through extensive sector consultation under the auspices of the Australian Learning and Teaching Council (Kift, Israel & Field, Bachelor of Laws Learning and Teaching Academic Standards Statement (ALTC, 2010)). The TLOs are the agreed national statement of the discipline-level outcomes that an Australian law graduate should achieve. If the Accreditation Standards are to be amended to require demonstration of practical skills, the more considered approach would be to review and update the TLOs first, in collaboration with the sector, and to align any revised Accreditation Standards with that updated articulation. QUT supports such a review and would contribute actively to it. QUT has mapped the practical skills currently developed and assessed across its LLB consistent with the TLOs and the Australian Qualifications Framework (AQF) Level 8 criteria. Specifically, that requirement is: <i>Graduates at this level will have advanced cognitive, technical and communication skills to select and apply methods and technologies to:</i> • <i>analyse critically, evaluate and transform information to complete a range of activities</i> • <i>analyse, generate and transmit solutions to complex problems</i> • <i>transmit knowledge, skills and ideas to others</i> That mapping ensures that practical legal skills are already systematically incorporated through QUT’s curriculum at an appropriately advanced level, and that teaching and assessment practices are aligned with the existing TLOs.
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	Adopting Appendix F as currently drafted would not represent an evidence-based improvement on existing practice; it would, however, generate substantial compliance work for limited educational gain. QUT's position is that the more optimal course is for the Committees to: (a) commission an updating of the TLOs through proper sector consultation; (b) settle a higher-level statement of fundamental competencies on that basis; (c) defer amendment of the Accreditation Standards until that statement is settled; and (d) provide for university autonomy in how those competencies are developed and assessed across each law school's curriculum.
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? QUT suggests the following amendments: • Replace the granular task-level skills with fundamental competencies expressed at a level appropriate to an academic law degree and relevant AQF level (noting Law degrees in Australia range from AQF levels 7-9) – for example, oral and written legal communication; legal research and analysis; ethics and professionalism; and problem-solving. The current drafting risks template-driven, box-ticking compliance rather than the deep capacity-building that should characterise university legal education. As QUT has set out in response to Question 1.1, the natural anchor point for any such reframing is an updated set of LLB Threshold Learning Outcomes. • Several items in the schedule reference specific technologies or platforms. Skills schedules at this level should be expressed in technology-neutral terms to avoid premature obsolescence and the need for frequent amendment as legal technology continues to evolve. • Items in the order of organising and maintaining files, creating client records, and time recording are firm-specific operational practices. They are not the proper subject of an academic law

	degree, which cannot, and should not, attempt to standardise firm-level administrative practice. As firm-specific operational tasks will invariably involve firm-specific technology, the proper place for development of these skills is in the workplace. • Certain items are not appropriately calibrated to AQF Level 7, 8 or 9 qualifications. For example, legal research, as framed, suggests competence in locating materials rather than the analytical engagement expected of a law graduate level. At the very least, these skills should be reframed to reflect identification, interpretation and application of legal authorities to “analyse and evaluate information to complete a range of activities” and “generate and transmit solutions to unpredictable and sometimes complex problems”. • The current drafting frames negotiation narrowly around simple commercial or contractual matters. Negotiation should be framed across the breadth of legal practice including civil, regulatory and criminal contexts, and across both transactional and dispute settings. • QUT endorses CALD’s submission that Indigenous cultural competency should be expressly recognised as an essential capability for Australian lawyers, distinct from generic cultural and linguistic diversity. The schedule does not currently engage with the body of scholarship on Indigenous cultural competency in legal education or recognise the unique status of Aboriginal and Torres Strait Islander peoples as the First Peoples of Australia. • Specific clinical competencies (for example, identification of substance abuse or mental ill-health, and intervention in such cases) require professional clinical training. They are not within academic legal faculty expertise. Wellbeing literacy, help-seeking and respectful workplace conduct can be supported through existing institutional channels and the National Higher Education Code to Prevent and Respond to Gender-based Violence, rather than through items in the skills schedule. • The schedule does not meaningfully engage with the implications of legal technology and artificial intelligence for the skills required of contemporary lawyers. If the schedule is retained, technology-assisted legal research, drafting, and matter management should be addressed as a question of professional competence and
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	judgement, including the limits and risks of AI tools, rather than as an awareness item.
1.3	Would law schools be able to implement these changes by the beginning of the 2028 academic year, as proposed? QUT does not consider the proposed 2028 implementation date feasible for a quality-assured implementation in a large law school. QUT has mapped its current LLB curriculum against Appendix F. That work confirms what CALD have submitted: substantive program redesign cannot begin until the revised regulatory framework is settled. On the Committees' own timeline, that is unlikely to occur before the second half of 2026, with adoption by admitting authorities potentially extending into 2027. Following the finalisation of standards, QUT's internal university approval processes for substantive curriculum redesign typically take 12 to 24 months. New or significantly redesigned assessment regimes require academic board endorsement and TEQSA-aligned quality assurance. Where redesigned subjects require staffing uplift, that can take time. The 2028 timeline also fails to take account of work already underway across Australian law schools to redesign assessment in response to generative AI – work that is competing for the same staff capacity needed for any practical-skills uplift. Authentic, secure and AI-resilient assessment across the Priestley 11 is an immediate priority and substantial resourcing constraint that the consultation paper does not acknowledge. Implementation also creates new operational complexity that is not addressed in the consultation paper. Australian law students frequently transfer between institutions, including across jurisdictions. Adding skills-mapping requirements on top of the existing Priestley alignment will make credit assessments materially more complex and risks requiring transferring students to repeat subjects (with associated up-front or deferred fee implications) where skills mappings between institutions do not align. The consultation should consider how this transfer complexity will be managed at sector level. A further constraint sits with the admitting authorities themselves. Re-accreditation of every Australian law course against revised Accreditation Standards in a single year will require substantial resourcing of those bodies, which on current capacity is unlikely to be available. The mechanics of phased re-accreditation should be settled before any commencement date is fixed.

	Taken together, these constraints make 2028 unrealistic. The 2029 academic year would be the earliest plausible commencement, and full accreditation and implementation across all relevant subjects would extend into 2030. A compressed timeline risks superficial compliance rather than the genuine educational improvement that motivates the reform. QUT supports CALD's position that any reforms should be staged, with law course changes settled and embedded before related PLT and PALT reforms 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? QUT has reviewed and endorses the proposed submission of APLEC on this question. There is not yet sufficient evidence to support Appendix F as the appropriate articulation of the practical skills and knowledge required at the time of admission. The skills schedule originated in the NSW Legal Profession Admission Board's discussion paper. It has not been the subject of the national consultation and stakeholder mapping necessary to underpin a national admission standard. National policy on entry-level lawyer competencies should rest on a transparent evidence base that tests assumptions and compares alternatives, rather than defaulting to a contested jurisdiction-specific approach. QUT supports the Committees commissioning further work to define the required competencies and associated practical skills on an evidence-based foundation before adoption.
2.2	Do you suggest any amendments to the categories or skills set out in the skills schedule at Appendix F? QUT agrees that further stakeholder consultation and research are required to confidently determine the categories and skills required for entry-level lawyers. QUT's specific amendments to the schedule, in respect of items relevant to the law course, are set out in response to Question 1.2. In respect of items relevant to PLT, and with reference to Queensland-specific observations: • The schedule should reflect the breadth of solicitor practice, including transactional, regulatory and government settings, rather than the litigation-facing emphasis evident in the current drafting.

	The schedule should expressly contemplate technologically mediated and hybrid legal practice, which is the operating reality for the majority of legal employers in Queensland.
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: - Working with clients from culturally and linguistically diverse backgrounds? - Preventing and addressing sexual harassment? - Awareness of obligations under anti-money laundering/counter-terrorism financing regulations? - Awareness of ADR options, or specific skills relating to ADR? - Negotiation skills in a wider range of settings, or other specific settings? - Drafting any other types of legal documents? If so, what types of documents? Working with clients from culturally and linguistically diverse backgrounds: This should be addressed within the core competencies of communication, client engagement and ethics and professionalism, rather than as a discrete skill. Cultural competence in working with First Nations clients should be specifically and separately recognised, consistent with CALD’s submission. Australian legal education and admission frameworks remain behind comparable jurisdictions, including Aotearoa New Zealand and Canada, in the integration of Indigenous laws and cultural competencies into the admission pathway. The reform of the skills schedule presents an opportunity to address that gap. Preventing and addressing sexual harassment: Higher education providers are already comprehensively regulated in this area by the National Higher Education Code to Prevent and Respond to Gender-based Violence, which requires ongoing, evidence-informed and trauma-aware education for all students. Specific inclusion of sexual harassment as a discrete skill in the Schedule would duplicate that regime without adding to it. To the extent there are profession-specific aspects (in particular, the obligations of supervisors, the operation of professional conduct rules in legal workplaces, and the position of junior lawyers in supervisor-supervisee relationships), these are properly addressed within the core competencies of ethics and professionalism rather than as a stand-alone schedule item. Concerns about bullying, harassment and poor supervision practices in legal workplaces are real and important; the appropriate response is through supervisor training (see response to Question 10.2) and through the regulatory frameworks governing

	professional conduct, not through additions to a pre-admission skills schedule. Awareness of obligations under anti-money laundering / counter-terrorism financing regulations: Yes, at an awareness level. Given the extension of the regime to legal services from 1 July 2026, awareness of client intake, source of funds and compliance obligations is now a baseline expectation of practice, and the schedule should reflect that. Awareness of ADR options, or specific skills relating to ADR: ADR awareness and basic practical skills should be included given the continuing displacement of court-based processes by ADR. This is particularly important in Queensland, where dispute resolution practice in family, commercial, regulatory and administrative contexts increasingly centres around mediation, conciliation and other ADR mechanisms. Negotiation skills in a wider range of settings, or other specific settings: Negotiation should be framed broadly across civil, commercial, regulatory and criminal contexts, and across both transactional and litigation-focused practice. The current framing around simple commercial disputes or contracts is too narrow for the practice realities most entry-level lawyers face. Drafting any other types of legal documents: The range should encompass file notes, client advice letters, simple pleadings, affidavits and witness statements, agreements, additional conditions in standard contracts, contemporary electronic court and tribunal forms, and correspondence to opponents and regulators. The emphasis should be on transferable, broadly applicable drafting capacities rather than an exhaustive list. In addition, these skills should explicitly recognise, and incorporate, the use and awareness of the benefits and risks associated with legal technology and artificial intelligence in conjunction with these skills as this reflects the practice of contemporary lawyers.
2.4	Should the option for graduates to undertake Supervised Workplace Training as a way of completing PLT be retained? QUT agrees that Supervised Workplace Training (SWT) should be retained as an equivalent pathway, provided each SWT plan is approved by the relevant regulator and demonstrates equivalence in skills training to a PLT course leading to admission. The SWT pathway is particularly important for graduates who enter regional Queensland practice with small firms, community legal centres,

	government agencies or sole practitioners, where structured PLT coursework attendance is not practicable. Removing SWT would foreclose a pathway that supports workforce supply in precisely the areas where the legal assistance sector is under-resourced.
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? The following higher-risk skills and values require independent calibration and moderation, and should be supported through approved provider delivery and provider-validated assessment: • Ethics and professional responsibility, including confidentiality, conflicts of interest and trust accounting. • Client interviewing and the giving of legal advice. • Advocacy and dispute resolution skills, including in online and hybrid formats. • Assessment of competence against transparent criteria.
2.6	Should there be any other amendments to Supervised Workplace Training? No further amendments beyond those identified in response to Question 2.5. QUT notes the importance of retaining clear regulator oversight of SWT plans to maintain consistency with the PLT course pathway and to protect the integrity of admission.
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 proposal provides no evidentiary basis or articulated rationale to justify the adoption of a four-week minimum duration, nor does it specify models that may have been considered and rejected, with associated rationale for same. A four-week period for coursework is, in practical terms, insufficient to support any model of pre-admission training that aspires to move beyond formulaic or compliance-based instruction. As currently framed, the proposal risks reducing PLT to a series of task-oriented drills, thereby diminishing its role in fostering substantive

	professional formation, which is a central objective of the existing PLT framework. While there is value in pre-reading and preparatory materials, the main utility of the PLT program comes through active engagement in the learning process, delivered by educators who are uniquely focused on the acquisition of practical skills and the demands of practice itself. This skills acquisition is contingent upon a structured and iterative pedagogical process that integrates observation, contextually situated practice, formative feedback, critical reflection, and the subsequent transfer and adaptation of skills across diverse professional settings, again from educators who take students beyond the formative undergraduate stage and assist students to translate this “real-world” scenarios. The imposition of a one-week pre-reading requirement, particularly where the volume and complexity of preparatory material would necessarily be quite substantial, warrants further consideration. The “front-loading” of a dense and conceptually demanding body of material carries a significant risk that, in the absence of guided instruction and scaffolded learning, students will vary considerably in their capacity to comprehend and assimilate the content effectively.
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? QUT considers that a longer course (potentially of the order of a university semester) is required to provide sufficient time and opportunity for the iterative skill-building – observation, practice, feedback, reflection, repetition, adaptation – that effective skills development requires. The compression of PLT cannot be justified by the proposal to embed practical skills in law courses. As QUT has set out in response to Question 1.3, the law-course reforms will not be embedded across cohorts before 2030 at the earliest. There will be no cohort of graduates entering PLT with practical-skills preparation under the new Accreditation Standards until at least 2031 or 2032. Compressing PLT in 2028 to anticipate that uplift would leave several cohorts of graduates underprepared. The proposal also assumes that academic and PLT pedagogy are interchangeable, which they are not. The Urbis Report does not support the four-week proposal. The Report’s findings on dissatisfaction with PLT concern the design, content and delivery of coursework, not its duration. The Report’s implications include refocusing PLT towards more applied learning, prioritising interactive

	teaching, and increasing emphasis on structured workplace experience. None of those implications supports a four-week intensive model. To the contrary, the Tasmanian model identified as a positive outlier in the Report is delivered over a longer, integrated period.
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? PLT should continue to be delivered at AQF Level 8 (graduate diploma level) or equivalent. Retention of AQF Level 8 is a critical signal that PLT is complex post-degree professional formation requiring autonomous application of knowledge and skills, judgement and responsibility, not simple vocational familiarisation. That signal matters to the profession, to admitting authorities and to the public. AQF alignment brings with it TEQSA oversight and the Higher Education Standards Framework, which provides external assurance of course design, learning outcomes, assessment, governance, quality assurance, and student participation and wellbeing. Removing that external oversight risks public confidence in the consistency of pre-admission standards. Removing AQF alignment would also remove FEE-HELP eligibility. That is a significant equity issue, with disproportionate impact on QUT's PLT cohort. Removal of FEE-HELP would operate as a direct cost transfer to a cohort that relies on the existing funding pathway to access PLT. Combined with the additional costs of compulsory in-person attendance (e.g. travel, accommodation and lost wages) the proposal would operate as an effective barrier to admission for a substantial proportion of QUT's PLT cohort. This would entrench, rather than address, the diversity and access issues the consultation purports to take seriously.
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? QUT does not support the proposal. In the event the proposal proceeds, the LACC framework would need to include quality assurance measures equivalent to those currently provided by TEQSA, including: • Clearly articulated outcome standards. • Transparent assessment requirements and assessment validation.

	• Moderation and calibration mechanisms across providers. • Independent external review. • Comprehensive recordkeeping requirements. • Governance arrangements for assessment quality and continuous improvement. • Robust safeguards for student learning, support, and wellbeing. • A compliance and enforcement mechanism with systematic monitoring and an obligation of continuous improvement. Without these measures, the proposal would create a high-stakes professional training pathway with materially weaker quality assurance than the regime it replaces.
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 in PLT Standards would improve consistency, fairness and transparency for students and admitting authorities. Any guidance must be capable of adapting to the rapidly developing landscape of generative AI tools, including their integration into commonly used productivity software. Guidance must accommodate, rather than freeze, the profession's evolving expectations of legitimate and appropriate use of those tools. As it stands, QUT adopts a principled, educative, and formally structured framework in relation to academic misconduct. This framework emphasises integrity, transparency, and the responsible use of emerging technologies, including generative AI, with a clear focus on equipping students to employ such tools ethically and appropriately in both academic and professional contexts. It is underpinned by formalised processes for the identification, investigation, and resolution of misconduct, ensuring procedural fairness and consistency. However, a transparent and standardised approach to reporting is seen as appropriate to support comparability across providers, maintain confidence in outcomes, and ensure that regulatory oversight can be exercised in a fair and informed manner.
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? The proposal misidentifies the relevant variable. The Urbis Report data on satisfaction with delivery mode reflects, in significant measure, the variable quality of online and hybrid PLT design as currently delivered – in particular, reliance on static, recycled materials and asynchronous content treated as a primary, rather than supplementary, mode. That is a design and quality assurance problem. It is not an argument for foreclosing synchronous online delivery as a standard option. The decisive question is whether the delivery model supports active participation, feedback, observed performance and professional interaction. Those outcomes can be achieved through well-designed synchronous online and blended delivery as well as through in-person delivery. QUT's student cohort makes the equity implications of the proposal especially acute. QUT PLT students include a proportion of regional and remote Queensland students, students with caring responsibilities, mature-age students, students with disability, and students whose financial circumstances make extended attendance at metropolitan-based intensives impractical. A mandatory in-person model, with synchronous online delivery treated as exceptional, would foreclose pathways to admission for a cohort the consultation otherwise identifies as central to legal profession diversity. The question requires consideration of the factors underscoring the importance of designing PLT models that are inclusive, adaptable, and aligned with both learner diversity and the evolving nature of professional practice. Furthermore, advances in educational technologies and the growing utilisation of self-paced learning methodologies necessitate models capable of accommodating diverse learning styles and preferences, as well as the various pressures facing today's law students . QUT supports a model in which synchronous online and well-designed blended delivery are accepted standard delivery modes, supported by a quality framework that addresses design, interactivity, feedback, observed performance and assessment, with asynchronous content limited to preparatory and supplementary materials. A related issue, not addressed in the consultation paper, is whether the proposal contemplates in-person attendance requirements for the practical skills training to be embedded in law courses under Proposal 1. If so, the impact on wholly online and dual-mode LLB and JD programs must be addressed expressly. QUT urges that any in-person expectation, if retained, be confined to PLT and not extended to law courses.
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? It is agreed that assessment is central to the role of PLT as a rigorous pre-admission stage. A review of the PLT Standards is supported to the extent that it reinforces clarity and consistency in how assessment is expected to operate; however, it should proceed on the basis that rigorous assessment processes are already embedded within existing AQF-aligned accreditation frameworks. In this respect, the focus should not be on introducing additional layers of prescriptive regulation, but on ensuring that the Standards articulate principled design expectations that align with established higher education quality assurance settings, with an emphasis on autonomy, application, and the demonstration of capability in context, rather than through prescriptive teaching and assessment methods. Consistent with adult learning and professional education principles, the Standards should require assessment that: • Prioritises competency development through contextually integrated tasks. • Specifies clear competency criteria. • Incorporates multiple and cumulative forms of evidence. • Provides structured opportunities for feedback and improvement. • Incorporates robust moderation and calibration processes across providers. • Supports learning progression and professional readiness, rather than operating as a narrow gatekeeping mechanism. Flexibility should be maintained to enable PLT providers to adopt innovative assessment approaches, including those responsive to technological developments and evolving professional practices, while remaining accountable to clearly articulated outcomes. In this way, the Standards can reinforce rigour by clarifying expectations within a robust assessment framework, rather than being unnecessarily prescriptive. QUT notes that effective skills assessment requires sufficient time for students to practise skills, receive feedback and adapt those skills to new legal contexts. A four-week compressed PLT course and a one-week pre-reading window cannot accommodate the assessment regime described above; this is a further reason to revisit Proposal 3.
Workplace experience	
7.1	Do you support the LACC retaining the requirement for a minimum of 15 days of workplace experience prior to admission?

	QUT supports retention of the 15-day minimum as the floor for workplace experience prior to admission. Workplace experience is consistently the most positively regarded component of PLT in the available evidence base, with the Urbis Report recording 60 per cent net graduate satisfaction with that component, materially higher than the satisfaction levels reported for any other PLT element. The Report's identified implications point to increasing the emphasis on high-quality, structured workplace experience, not reducing it. QUT endorses APLEC's submission on this point. Workplace experience is the component of pre-admission training that most directly develops the readiness to enter supervised practice that PLT exists to support. Compressing or weakening the requirement would remove what the evidence base identifies as the most effective element of the current model.
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? QUT supports updating the Standards to provide better guidance on tasks and the development of specific skills during workplace experience. However, that guidance cannot precede a settled, evidence-based articulation of the relevant skills framework. QUT concurs with the concerns raised in the proposed response from APLEC that Appendix F as currently drafted is not a sufficient foundation for that guidance. If guidance is developed, QUT suggests it should be sufficiently broad to accommodate the diversity of legal workplaces in which Queensland graduates undertake placements, including community legal centres, government agencies, in-house counsel teams, regional small firms, and sole practitioners. Excessively prescriptive guidance risks marginalising the placements that support workforce supply in under-resourced sectors.
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? Effective workplace experience is affected greatly by the quality of supervision. QUT supports the development of guidance, prepared through stakeholder mapping that ensures the guidance is workable for the full range of legal practices that host placements, including in regional

	and rural Queensland and within community legal and government legal services. In preparing such guidance, it should be recognised that supervision practices will vary significantly across different practice settings, firm sizes, and areas of law. Some supervisors will value and emphasise close, directive oversight with structured task allocation and frequent feedback, whilst others will prioritise autonomy, experiential learning, and reflective practice. These differences are not necessarily deficiencies, but reflect the diversity of approaches to supervision in a professional workplace, and the methods through which professional competence is developed.
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 capacity to supervise the professional development of an early career lawyer is a learned skill, not an innate one. A review of available training would be timely, particularly in light of the increased reliance on supervision contemplated in the post-admission reforms.
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. Additional training is required. Content should include: • Understanding of the skills and knowledge acquired through PLT prior to admission, so that supervisors can build effectively on that foundation. • Ethical supervision practices, including identification and management of conflicts and confidentiality issues that arise in supervisory relationships. • Wellbeing supports for supervisors and supervisees, including recognition and referral pathways. • Effective feedback techniques. • Recognising and responding to inappropriate workplace behaviour, including bullying, harassment and discrimination. Delivery is well-suited to accredited CPD modules, supported by professional bodies and capable of being undertaken in flexible formats. QUT is well placed to contribute to the development and delivery of such

	training, given the School of Law's clinical capacity and existing relationships with the Queensland profession.
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? QUT supports flexibility that recognises substantive legal work undertaken during the law course, provided appropriate safeguards apply. QUT endorse APLEC's submission that work experience during studies, while valuable, does not replace structured workplace experience during PLT, particularly where the prior experience is undertaken early in the law course. If the amendment is adopted, the following safeguards should apply: • Eligible workplace experience should be limited to the final year or later years of the law course, to ensure sufficient legal knowledge to apply, reflect on, and benefit from the experience. • Workplace supervisors should be trained in the educational purpose of the placement and required to certify that appropriate substantive legal work was undertaken. • Equivalence to PLT-level workplace experience should be required; routine administrative work in a legal workplace should not satisfy the requirement. • PLT provider approval should be obtained prospectively, before the experience is undertaken, rather than retrospectively. • A minimum of 15 days of workplace experience undertaken as a component of PLT should be retained. PLT providers, as the bodies with primary responsibility for assuring pre-admission competence, are well placed to certify the suitability of pre-PLT workplace experience against the eligibility criteria.
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? PLT providers have a legitimate role in assisting students to identify suitable workplace experience opportunities, particularly for students

	without existing professional networks. The Urbis Report identifies that students without prior legal roles or professional social capital face the greatest difficulty accessing meaningful workplace experience – a profile that, in Queensland, includes a substantial proportion of QUT’s first-in-family students and regionally based students. Any proposed obligations placed upon a PLT provider, which will in turn will establish particular expectations with students, should reflect realistic market constraints as the availability of workplace experiences are fundamentally driven by market conditions and the capacity of the profession to offer placements. PLT providers cannot guarantee placement supply, and obligations should be framed in terms of structured support, information, and brokerage rather than guaranteed outcomes.
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? QUT endorses APLEC’s proposed submission. The proposed 30 hours of PALT across the first two years of practice is manifestly insufficient if it is intended to replace the practice-area training currently delivered through PLT electives, which represents approximately 150 hours of structured training. The proposal poses particular risk for junior lawyers in regional, rural and remote Queensland, in community legal centres, and in small firms, where supervisory capacity is constrained and where junior lawyers assume substantive responsibility quickly. The flow-on risks extend to the practices, the public, and legal professional indemnity insurers. The proposal also imposes an additional cost on the lowest-paid practitioners, who frequently pay for their own CPD. Framing this cost as tax-deductible understates the cash-flow pressure on early career lawyers in lower-paid practice settings. Finally, the proposal does not adequately address the position of newly admitted lawyers who are not in legal employment or who work in policy, government or other adjacent settings where supervised legal practice is not available. The proposed model assumes uniform employment circumstances that do not reflect the diversity of post-admission pathways.

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. QUT does not support the proposed 30 hours of PALT as an appropriate or sufficient standard for unrestricted practice and therefore does not support imposing the requirement as a practising certificate condition in the form proposed. If a post-admission training requirement is to be retained in some form, it should be designed coherently with reformed PLT, calibrated to the realities of post-admission practice, and supported by an adequate regulatory framework. The mechanism of imposition can be considered once the substance is settled.
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? Given the desirability of a nationally consistent profession and the realities of cross-jurisdictional and cross-mode mobility within careers, QUT does not support a categorical exemption for barristers.
15.1	Do you support the proposal that PALT should be delivered in areas identified and developed by PALT providers, subject to the approval mechanisms set out separately below? QUT endorses APLEC's proposed submission. If skills and practice-area training are to be removed from PLT, the replacement post-admission training must be designed and developed coherently to build on the pre-admission skills foundation. Inconsistent and uncoordinated PALT delivery, disengaged from the trajectory of teaching and learning initiated in the pre-admission phase, will adversely affect the competence and reliability of early career lawyers and undermine the public protection function of the admission regime.
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? QUT does not support PALT being undertaken in a single practice area. Early career lawyers move firms, sectors and roles frequently; early specialisation risks leaving them under-prepared for the breadth of skills required across legal practice.

	The risk is acute for small, regional and community-based Queensland practices that may recruit junior practitioners only to discover they lack the breadth of skills and knowledge required of an entry-level lawyer in a generalist setting. While not specifically focused towards the question posed, it might also be recognised that in many cases it will be the firms and organisations that ultimately control the PALT that the lawyer will undertake, and thus the PALT will be in many cases be contingent on organisational needs rather than individual preference.
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? QUT does not support additional practice restrictions during PALT as proposed. If PLT is compressed to four weeks as proposed, additional restrictions on early career lawyers will be needed to compensate for inadequate pre-admission preparation. Additional practice restrictions will affect graduate employment, particularly in smaller legal practices, community legal centres and government agencies in Queensland, which rely heavily on the contribution of early career lawyers. Restrictions will compound existing workforce supply pressures in the legal assistance sector, especially in regional, rural and remote regions. Restrictions risk reducing access to legal services in precisely the areas where access is already inadequate.
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? QUT does not support the proposed PALT model as a sufficient or appropriate post-admission training framework, and the question of delivery mode arises only if the substance is settled. In the event that PALT proceeds in some form, synchronous online delivery should be available as a standard option, not as an exception. The equity and accessibility considerations set out in response to Question 5.1 apply with equal force to early career lawyers in regional, rural and remote Queensland, in small firms, and in community and government legal settings where in-person attendance at PALT in metropolitan locations would impose disproportionate cost and time burdens.

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? QUT does not support the proposed PALT model as drafted. If PALT proceeds, regulator approval of content and providers is essential to maintain consistency and quality. In Queensland, that approval would fall to the Queensland Law Society. QUT notes that the proposal would add materially to the regulator's workload and recommends that any approval framework be supported by adequate resourcing and by clear criteria, including provider quality assurance, assessment validity, and content relevance to early career practice.
19.1	Do you support the proposal that PALT should incorporate rigorous assessment? Do you have any views on the parameters for this requirement? QUT does not support the proposed PALT model as drafted. If PALT proceeds, rigorous assessment is essential if the training is to perform a meaningful regulatory and educational function. At minimum, assessment parameters should: • Reflect clearly articulated learning outcomes for each PALT module. • Require demonstration of skills and knowledge at the level and of the type that the regulatory regime contemplates. • Use realistic practice contexts and practice-based assessment tasks. • Incorporate moderation and calibration across providers. Given that it is proposed that the unrestricted practising certificate will be dependent upon successful completion of PALT, mechanisms for review of assessment and supplementary assessment would necessarily need to be addressed to ensure procedural fairness, and consideration given to maximum time for completion of the PALT.
Clinical legal education	
20.1	Do you support the Committees considering options for the inclusion of clinical legal education as a component of PLT?

	QUT does not support the inclusion of clinical legal education (CLE) as a component of PLT. CLE belongs within the law course, and QUT currently delivers CLE within its LLB program. CLE is an undergraduate-level experiential learning opportunity with a different pedagogical purpose, supervisory model and resourcing base from PLT. Conflating CLE with pre-admission practical training risks degrading the quality and distinctiveness of each. CLE is also resource-intensive: it depends on insecure funding, specialist supervisory capacity, and finite placement availability. Mandating CLE as a PLT component would compound those pressures and would create significant access inequities between PLT providers, only a subset of which currently have CLE-equivalent capacity. Access to CLE-style placements is not evenly distributed across the PLT provider market or geographically across Australia. QUT endorses CALD's submission that, where CLE is to be supported in the legal education continuum, the law course is the more appropriate location for it. QUT is willing to contribute to sector work on improving the quality, accessibility and recognition of CLE within the law course.
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 CLE should not be a mandatory component of PLT. Making CLE mandatory would create acute access barriers: only a subset of current PLT providers have CLE-equivalent capacity, and the supervisory, placement and funding requirements of CLE cannot reliably be scaled across the PLT provider market on the proposed implementation timeline. The result would be a mandatory requirement that some PLT providers could meet and others could not, with students bearing the consequences in cost, delay and geographic constraint. If CLE were nonetheless made mandatory in PLT, QUT would not support students who undertake CLE in their law degree being entitled to credit toward PLT requirements. Crediting CLE undertaken as part of an undergraduate law course against pre-admission PLT does not respect the different pedagogical stages and purposes of each, and would disadvantage students at universities without an LLB-embedded CLE offering.
20.3	If clinical legal education is optional, should completion of clinical legal education satisfy the requirements for PALT? CLE is a valuable experiential learning opportunity but is not designed to cover the full range of professional and ethical practice skills that PALT is

	intended to develop. Substitution of CLE for PALT would conflate two distinct educational purposes.
20.4	Who should be responsible for delivering and supervising clinical legal education? Consistent with QUT's position that CLE belongs in the law course, responsibility for delivery and supervision should rest with accredited universities working with appropriate community partners such as accredited community legal centres. Universities have the existing infrastructure, pedagogical expertise, governance arrangements and supervision capacity to deliver CLE effectively. QUT delivers CLE within its LLB on this model.
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? QUT does not support making CLE a component of PLT, mandatory or optional. If the proposal is nonetheless to be developed, QUT agrees that a working group of suitably qualified educators and experts in legal clinical education would be essential to ensure the model is pedagogically defensible. QUT is willing to participate in such a working group.
Supervision of early career lawyers	
21.1	Do you think there is a need for additional guidance to supervisors of early career lawyers, to improve supervision? QUT endorses APLEC's proposed submission. The quality of supervision of early career lawyers is currently inconsistent, in part because there is no mandatory training or support for supervisors. Early career lawyers in many practice settings rely on the goodwill, capacity and skill of individual supervisors. Additional guidance (and resourcing of that guidance) is needed regardless of whether the PALT proposal proceeds in its current form.
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? QUT supports the establishment of such a working group and would welcome the opportunity to contribute, given the School of Law's existing relationships with the Queensland profession and its clinical legal education infrastructure.

Implementation timing

22.1

Do you support the proposed transitional arrangements and implementation timeframe set out at Proposal 22?

QUT does not support the proposed transitional arrangements or implementation timeframe. The proposal does not adequately account for the range, complexity and interdependency of the changes contemplated across jurisdictions and across the legal education continuum.

The interdependent moving parts include:

- Law course redesign and accreditation under revised LACC Accreditation Standards.
- PLT redesign, including length, content and delivery mode.
- PLT re-accreditation across each jurisdiction.
- Design and regulation of PALT, including provider approval, content approval, and assessment frameworks.
- Training and support of supervisors to carry the increased post-admission obligations the reforms imply.
- Adoption of revised Accreditation Standards and PLT Standards by each admitting authority.

These elements cannot be designed in isolation, much less implemented in parallel, on the timeframe proposed. The proposal also fails to make adequate provision for transitional cohorts. Students who complete an LLB or JD under existing requirements but are required to undertake PLT under the revised regime will face significant uncertainty. So will students who study part-time, who take leave from study, who change institutions, or who have a gap between completing PLT and seeking admission. Transitional arrangements need to accommodate students enrolled in double-degree programs up to the maximum permissible period of completion. Transitional complexity is also a substantive equity burden: lower-SES cohorts and students undertaking double degrees frequently do not complete within four years, and many institutions will need teach-out arrangements that span the full length of the law course. The consultation paper does not currently address this.

A further constraint sits with admitting authorities. Re-accreditation of every Australian law course in the same year as the revised Accreditation Standards commence is not operationally realistic, and yet the consultation paper offers no schedule for phased re-accreditation. The

	sequencing of re-accreditation across jurisdictions needs to be settled before any commencement date is fixed. The implementation timeline also fails to provide for piloting and evaluation of the reformed model. No proposal is made to test the reformed PLT, the PALT regime, or the supervision uplift before national implementation. For reforms of this scale, evidence of efficacy should precede mandatory adoption. QUT supports CALD's submission that any reforms should be staged. Law course changes should be settled, embedded and evaluated before related PLT and PALT reforms commence. The earliest plausible commencement of any law course requirements is the 2029 academic year, with full embedding by 2030. PLT and PALT reforms should follow once those law course changes have been embedded across cohorts, supported by piloting and evaluation. A coherent, staged and evidence-based implementation pathway is preferable to a synchronised 2028 commencement that risks producing superficial compliance rather than genuine educational improvement.
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