



13 May 2026

The Legal Services Council's Admissions Committee
and
The Law Admissions Consultative Committee

By email only: submissions@legalservicescouncil.org.au

Dear Committees,

National Review of Practical Legal Training - Submission

Please find attached Piddington's submission in response to the proposed reforms to Practical Legal Training and the broader training pathway for early career lawyers.

As you will see, Piddington supports the broad objective of reform and accepts that there are legitimate concerns regarding quality, consistency and accessibility within parts of the current PLT framework. However, our submission raises a number of concerns about the practical operation of the proposed model, particularly the reduction of structured pre-admission training before sufficient replacement systems have been fully designed, implemented and tested.

Our submission focuses primarily on those matters most directly connected to Piddington's practical experience as a provider of profession-facing legal training in Western Australia. In particular, we have sought to address:

- the proposed reduction of PLT to a four-week minimum model;
- the increasing reliance on workplace supervision and post-admission learning;
- the operational realities of practitioner-led teaching and assessment;
- implementation and transition risks; and
- the potential unintended consequences for quality and consistency across the profession.

We have also attempted to approach the consultation constructively and pragmatically. While we support meaningful reform and ongoing review, our concern is that aspects of the current proposal may unintentionally reduce consistency in graduate capability by shifting training responsibilities into systems that are presently variable, underdeveloped or not yet fully defined.

Importantly, our submission reflects the perspective of a smaller, practitioner-led and not-for-profit provider operating within a highly collegiate professional environment. We consider it important that any national reform framework preserves flexibility for high-quality, immersive

The Piddington Society

Kaya from Boorloo, on Wadjuk Noongar Boodja.

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and profession-connected training models, rather than inadvertently flattening the market into a single minimum-standard approach.

We appreciate the significant work undertaken by the Legal Services Council and the Legal Admissions Consultative Committee in progressing this review and would be pleased to engage further on any aspect of the submission if that would be of assistance.

In collegiality,



Elisha Rose
Director of Professional Programs

Att

The Piddington Society

Kaya from Boorloo, on Wadjuk Noongar Boodja.

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The Piddington Society - Submission to the Legal Services Council on Review of Practical Legal Training Consultation Paper – May 2026

1. Executive position

The Piddington Society WA Inc ('Piddington') welcomes the opportunity to respond to the national consultation on reform of Practical Legal Training (PLT). Piddington supports the broad objective of improving the practical preparation of Australian law graduates and accepts that there are legitimate concerns about cost, quality, relevance and consistency in existing national PLT offerings.

Nevertheless, Piddington remains concerned that the as currently proposed replacement model, risks reducing the existing and structured pre-admission training regime before a sufficiently robust replacement framework has been designed.

The proposed model depends heavily on three assumptions that, respectfully, require a closer scrutiny:

- That law schools will be able to deliver meaningful and consistently assessed practical skills training across accredited law degrees (and can implement that quickly);
- That workplace supervision and early-career training environments will be sufficiently strong to absorb a larger share of responsibility for practical training; and
- That there is an available teaching workforce of legal practitioners who hold recent, relevant practice experience and the capability to teach practical skills effectively.

The proposed model also assumes that "on the job" learning will operate as a consistent and effective mechanism for developing practical competence. In practice, this outcome must be highly dependent on the quality of supervision, the nature of the work undertaken and the capacity of the workplace. It would be naïve to proceed on the basis that this assumption might apply uniformly for the entire Australian national legal profession.

Piddington's principal submission is that PLT reform should proceed carefully and cautiously. Reform should not flatten all PLT models into a short, minimum-duration capstone course. High-quality, immersive, practitioner-led PLT should remain available and valued. If the proposed reform is to succeed, the post-admission and supervision components must be designed with substantially more detail than presently appears from within the consultation materials.

Respectfully again, the proposed reform model as currently formulated risks eliminating what is currently an assembly of structured and assessed training to substitute merely an optimistic reliance upon systems that are variable, underdeveloped or not yet designed.

2. Scope of this response

Piddington has not sought to respond to every consultation question. Our submission focuses on those matters most directly relevant to Piddington's expertise as a provider of practical, profession-facing legal training in Western Australia. It reflects the organisation's scale and resourcing. As a small, not-for-profit provider, Piddington has prioritised providing detailed input on those aspects of the proposed reforms where it can offer a meaningful and informed contribution. The submission therefore addresses:

- The proposed skills framework;
- The proposed reduction of PLT to a four-week minimum course;

- Mode of delivery and assessment;
- Workplace experience and supervision;
- Post-admission legal training (PALT);
- The teaching workforce required to support the proposed model; and
- Implementation and transition risks.

3. General observations on the proposed model

Manifestly, the proposed model represents a significant structural shift. It would redistribute practical legal training across three stages: at law school, a short pre-admission PLT course and some structured post-admission training during the admittee's first two years of legal practice.

In our view practical competence develops over time, through repeated exposure to legal problems, feedback from experienced lawyers, and opportunities to observe and perform professional tasks. It is unrealistic to expect any single PLT program to complete the perfect transition from student to practitioner.

The concern is not the direction of reform. The concern is whether the architecture proposed is sufficiently strong to carry a training burden that is being moved away from pre-admission PLT.

NSW review materials identify serious dissatisfaction with the current system, including findings that only 43% of graduates considered PLT assignments practical or relevant, 40% rated teaching methods as satisfactory, and only 13% considered fees reasonably priced. That feedback demonstrates a need for change. It does not, however, establish that all existing PLT models should be compressed into a short capstone, nor that the training moved out of PLT would be delivered effectively, let alone more effectively, elsewhere.

Piddington understands that one key driver of the proposed reforms is the desire to reduce the cost burden on graduating law students. However, it is difficult to see how this outcome will be achieved in practice. While there may be inefficiencies in parts of the current market, the proposed model does not target those inefficiencies. Instead it introduces new structural costs.

First, the proposed model requires substantial redevelopment across the existing PLT sector. Providers will need to invest significant resources in redesigning course structures, in developing new materials, and creating more rigorous and authentic assessment frameworks. This is not a minor adjustment. Rather, it is a fundamental rebuild of PLT delivery.

Second, the (welcome) emphasis on in-person delivery, nevertheless must undoubtedly increase operating costs. This includes CBD venue hire, coordination of in-person sessions, and the practical requirement for facilitation and administration in addition to teaching staff. The move toward more detailed, practice-based assessment will also increase marking time and associated staffing costs.

From a teaching perspective, the model assumes a greater reliance on practitioner-led delivery across multiple offerings. At Piddington, for example, this would involve moving from a model where a legal practitioner as instructor may contribute to a subject once per year, to one where they become required to deliver the same content in person multiple times per year. This increases both cost and demand on what is a limited pool of suitable instructors.

Taken together, these factors suggest that the reforms will not remove cost from the system, but instead redistribute and, in some cases, increase it. It is therefore not clear how the market could realistically deliver the proposed model at a lower cost than under current arrangements.

The proposed model seeks to reduce the duration of PLT while simultaneously increasing expectations around in-person delivery, practitioner-led teaching and assessment rigor. These laudable objectives are inherently in tension and, in practice, are likely to increase the cost and complexity of delivery, rather than reduce it.

In Piddington's experience, the proposed reforms are unlikely to reduce the real cost of delivering high-quality PLT. Our current course fee is \$8,990, which reflects what is required to sustain quality delivery, experienced practitioner-teachers, detailed assessment and meaningful student engagement. Under our existing model, students already receive approximately 18 days of in-person teaching, delivered through a single annual intake. In practical terms, we do not consider it feasible to increase in-person delivery requirements, expand assessment obligations and operate multiple face-to-face cohorts per year while simultaneously reducing course costs without compromising quality. On top of that, we have to charge for delivering PALT. The overall cost of PLT would undoubtedly increase.

4. Structural Risks in the Proposed Model

The proposed model is premised on a significant shift in where and how practical legal training occurs. It reduces structured pre-admission training and places greater reliance on workplace-based learning and post-admission training. This shift gives rise to several interrelated structural risks.

First, the model assumes that supervision and training across the national legal profession workplaces are sufficiently consistent and effective to support the transition. In reality, this is far from the case. While workplace learning is an important component of professional development, it is not a substitute for structured, assessed training. In the absence of consistent standards, reliance on workplace learning introduces variability, rather than assurance. The quality of supervision across the profession is highly variable. Reducing pre-admission training while relying on the workplace to fill the training gap is likely to increase variability in competence among early career lawyers, rather than reduce it.

Secondly, the reform is framed as reducing cost, but in substance it only redistributes cost rather than reducing it. While the upfront cost of PLT may decrease, the introduction of mandatory post-admission training, together with the time required for supervision and training to within legal practices, shifts the financial and operational burden to employers and early career lawyers. This is likely to carry downstream consequences for hiring decisions, particularly in smaller practices.

Thirdly, the model implicitly adopts a "learning on the job" approach. While this approach may be effective in well-resourced and structured environments, it is far less reliable within settings where supervision is limited or inconsistent. Under the current system, PLT provides a structured exposure to practice that is, at least in part, independent of the quality of a particular workplace. Reducing that structured component increases reliance on the variability of individual employment environments.

This shift also effectively positions employers as co-trainers, co-assessors and capacity providers within the training system. While this may be workable for larger firms with established training infrastructure, it is considerably more challenging for small firms, sole practitioners, regional practices and community legal centres, which comprise a significant proportion of the profession.

Fourthly, the proposed model assumes that law schools will be able to deliver meaningful, assessed practical skills training at scale. This represents a significant shift in the traditionally academic teaching role, the capability and resourcing of law schools. There is currently no clear evidence that all law schools are equipped to deliver this result consistently, nor how variation in delivery will be managed.

Finally, the model depends heavily on practitioner-led teaching, ongoing PALT delivery and in-person training. This assumes the existence of a sufficiently large and sustainable pool of experienced practitioners who are willing and able to teach to an admittee cohort. In practice, this pool is limited. Without a clear strategy to develop and support this teaching workforce, there is a risk of inconsistent delivery, over-reliance on a small group of contributors, or a gradual reversion to lower-quality delivery models.

Taken together, these issues suggest that the proposed reforms may redistribute responsibility for training across the system without resolving the underlying challenges of supervision, capacity, cost and consistency.

Ultimately, variability in the training outcomes for the next generations of Australian legal practitioners is not only a professional or educational concern, but a consumer protection issue. Inconsistent preparation of early career lawyers will carry direct implications for the quality and reliability of legal services delivered to the public.

5. Risks of Uniform Reform in a Diverse PLT Market

The proposed reforms are, in part, responding to deficiencies in segments of the existing PLT market. But by a response that seeks to adopt a uniform and more simplified model there is a risk that the response will not adequately distinguish between higher and lower quality PLT providers. Concerns about cost, delivery methods and educational value in some programs are well documented. But a prescriptive ‘one size fits all’ reform risks inadvertently diminishing those providers that already deliver immersive, practice-based and profession-connected training.

Meaningful reform should be calibrated to lift minimum standards and address underperformance, rather than flattening the market to a lowest common denominator. Care should be taken to ensure that high-quality, practitioner-led models are not constrained or displaced by reforms designed to correct issues that are not universal across all providers. In our experience, there is an understandable tendency for both graduates and employers to prefer and find pathways that minimise time and cost.

In practice, minimum standards tend to become the default standard. A four-week PLT model is therefore unlikely to operate as a baseline, but rather as the prevailing benchmark model across the national PLT market.

Piddington holds a significant concern that the proposed reforms may deliver unintended consequences for the structure of the PLT market. Smaller, practitioner-led providers that deliver high-quality, profession-connected training may be disproportionately affected by the increased costs associated with implementation and ongoing delivery. These include the costs of course redevelopment, expanded assessment requirements, in-person delivery and the need to sustain a suitably qualified teaching workforce.

For smaller PLT providers, particularly not-for-profit organisations, these greater costs will not be sustainable. There is a real risk that such providers exit the market, not because of deficiencies in quality, but because the regulatory and cost settings render their existing model unviable.

The likely consequence is a further consolidation of the PLT market among a small number of large providers. This outcome would be concerning given that many of the issues identified in the consultation—particularly in relation to cost, perceived relevance and student experience—have arisen within a market already dominated

by large-scale delivery models. Reducing diversity in provision and therefore such limited competition as presently exists in the national PLT market risks entrenching, rather than addressing, those concerns.

A diverse PLT provider landscape is important to maintaining quality, innovation and responsiveness to the profession. Reform should therefore be calibrated carefully to avoid unintentionally displacing high-performing models while attempting to address problematic issues that are not uniform across the sector.

There is a risk that reform designed to improve quality may instead consolidate delivery within models that have already been subject to sustained criticism.

6. Targeted responses to consultation questions

Questions 1.1–1.3 – Law courses and practical skills

Piddington supports, in principle, the proposal to require law courses to demonstrate how they incorporate practical teaching, training and assessment of identified practical skills. A law degree should not be entirely detached from the practical realities of legal work.

However, Piddington cautions against assuming that universities can readily absorb this role by the beginning of the 2028 academic year. There are at least three implementation risks.

- First, practical legal skills cannot be taught well merely by adding exercises to existing units. They require careful design, realistic materials, feedback loops and suitably experienced instructors.
- Second, universities vary significantly in their connection to the practising legal profession. Some may be well placed to teach applied skills; others may need substantial time and support to build that capability.
- Third, if practical skills teaching is delivered primarily by existing academic staff holding insufficient recent practice experience, the proposed reforms may only exacerbate existing concerns about a lack of practice relevance in the teaching of practical skills.

The proposal should therefore be supported only if accompanied by clear quality standards, meaningful assessment requirements and some better evidence that law schools have access to appropriately qualified teaching staff.

Recommendation: Law degree reforms should proceed only with clear accreditation standards for practical skills teaching, including requirements for authentic assessment, practitioner input and evidence of teaching capability.

Questions 2.1–2.3 – Practical knowledge and skills required at admission

2.1 - Piddington would support simplifying and refocusing the PLT Competency Standards subject to the qualifying comments below. The current framework is detailed and prescriptive. It can encourage bare curriculum coverage, rather than the delivery of competence.

The revised skills framework should clearly distinguish between:

- Foundational skills that must be competently demonstrated before admission to legal practice;
- Skills that are introduced before admission, but are developed further during supervised practice; and
- Practice-area specific skills that should be developed through PALT and workplace supervision (such as drafting a contract, conducting a detailed negotiation).

The distinction is critical. If the skills schedule asks too much of pre-admission training, the reform will fail to reduce complexity and cost. If it asks too little, admission to practice may occur before the graduate has acquired the minimum practical capability needed to enter supervised practice safely.

2.2 – There are several skills categories that Piddington would include in a revised skills list, they include:

- How to work with a supervisor/team (this is *the* survival skill as a first year lawyer) and should cover, how to present work, how to communicate with a supervisor, how to take and apply feedback, how to escalate risk, how to add value to a team and work within a team structure; and
- Workplace rights and law; an appropriate commissioner/barrister from the state jurisdiction should be invited to speak and to upskill a student with knowledge on their workplace rights, responsibilities and expectations in the workplace, relevant laws for a safe workplace etc; and
- How to write like a lawyer, this extends beyond technical drafting to encompass the broader skill of clear, structured and effective legal communication. It includes a working knowledge of grammar and style, but more importantly the ability to adapt tone and content to different audiences, including clients, colleagues and the court. Early career lawyers must be able to write concise emails, file notes, correspondence and short advices that accurately convey legal reasoning while remaining accessible and practical. This is a foundational skill that underpins nearly all aspects of legal practice and should be explicitly recognised as such.
- We would split Ethics and Professional Responsibility, so that ethics can be properly developed to include ethical duties as an employee, fiduciary duties to your employer and client etc as well as the existing proposed skills.

In addition, we would propose two entirely new skill sets:

- “Equality and Wellbeing”. This should cover personal branding, reputation, mental health and psychological safety, resilience skills, inclusion in practice, professional boundaries etc. This should be recognised as a distinct and standalone skill set, rather than being subsumed within Ethics and Professional Responsibility, to ensure it receives the focused attention and practical development it requires. These are not peripheral issues, they directly impact professional judgment, ethical decision-making, client outcomes and retention within the profession. Accordingly, they should be treated as core professional competencies rather than ancillary topics.
- “Legal Reasoning and Analysis”. This should be recognised as a distinct and foundational skill, rather than being merely assumed as acquired as a part of the gaining of other competencies. It involves the ability to analyse incomplete or uncertain facts, identify the relevant legal issues (which may cover multiple practice areas), apply legal principles in a structured and logical way, and arrive at a reasoned and defensible conclusion. Importantly, it also includes exercising judgment within situations where the law is not clear-cut, weighing competing considerations and understanding when further information or advice is required. This is a core professional capability that underpins advising, drafting (both documents used in litigation, such as outlines of submissions, and commercial and other documents), oral advocacy and decision-making in practice.

The current framework tends to assume that legal reasoning is inherent in other skills, such as advising or drafting. In practice, early career lawyers often struggle not with identifying the law, but with applying it to real-world, imperfect scenarios. Legal reasoning in practice requires more than knowledge—it requires judgment, structure, and the ability to work through ambiguity. For this reason, it should be explicitly recognised and developed as a standalone skill.

An alternative, would be for Legal Reasoning and Analysis to be a PALT course which would allow the skills to be taught with detail and particularity. Or better still, this could be taught both pre and post admission to allow for development to occur as the graduate matures.

2.3 - Piddington supports the inclusion of contemporary professional capabilities in the skills schedule, including working with clients from culturally and linguistically diverse backgrounds, preventing and addressing sexual harassment, awareness of AML/CTF obligations, AI use ethics and practicalities, ADR awareness, negotiation and practical drafting.

However, these topics must not be treated as isolated awareness sessions. A better and more effective approach is to integrate them into realistic practice scenarios. For example, ethical duties, power imbalance, cultural context, trauma, communication barriers and professional boundaries are best taught through applied exercises rather than stand-alone lectures. At Piddington, we teach these topics as a part of our client interview skills session, which moves beyond the basics of how to obtain facts from a client, to appreciating how all of the above issues may need to be addressed within or arising from a client interview (as well as for the safety of the lawyer).

In relation to drafting, the skills schedule should include more than letters of advice. Entry-level lawyers should have structured exposure to commonly encountered professional documents such as:

- File notes and attendance notes;
- Basic letters to clients and other practitioners;
- Short advices and memoranda;
- Simple affidavits;
- Basic court documents and procedural correspondence (ie discovery/disclosure lists, consent orders and emails to a judges' associate);
- Chronologies and related documents which is an area where early careers lawyers can add significant value to matters; and
- Internal reporting and matter management documents.

Recommendation: The skills schedule should be framed around demonstrated applied competence, not topic exposure. It should require authentic tasks and assessment of professional judgment, communication and practical drafting. It should be expanded to cover Equality and Wellbeing, Legal Reasoning and Ethics should be split from Professional Responsibility as it is at the very core of being a good lawyer.

Questions 2.4–2.6 – Supervised Workplace Training

The suggestion does not align with an expressed aim to nationalise the training of early career lawyers. Therefore it should be removed, or implemented across the country.

Piddington would support a national roll out of Supervised Workplace Training as an alternative pathway, provided it is subject to clear standards and does not become an unstructured substitute for PLT. It presents as similar to the old style Articles program, which lingered in WA until 2010 (though before this many had turned towards the current PLT model rather than the Articles program). Some would be encouraged by this change. Others would see it as a step back in time.

If rolled out nationally, core areas such as ethics, professional responsibility, file management, client communication, trust and office accounting principles and practical drafting should be delivered or verified

through approved programmed training. Workplace exposure alone should not be assumed to produce competence.

Any supervised workplace pathway should include mandatory supervisor training, documented learning plans, structured feedback and independent oversight by the admitting authority or approved provider.

Questions 3.1–3.2 – Proposal to reduce PLT to a four-week minimum

Piddington cannot support a universal reduction of PLT to a four-week minimum in its current form. Piddington accepts that a shorter PLT model may be appropriate in specific circumstances where there is evidence of strong prior training and well supervised workplace exposure – the proposed new model does not sufficiently demonstrate that.

The difficulty is not with the idea of a focused capstone. A shorter, intensive course may be appropriate for some students where there is strong evidence that they have already received rigorous practical skills training during their degree and hold some meaningful workplace exposure. The difficulty is that adopting four weeks as the minimum national architecture, before the other parts of the model are proven (and there has been a ‘test’ run in one jurisdiction that has had independent assessment and review).

The proposed four-week model appears to rest on two as yet wholly unproven assumptions. First, that law schools will have embedded practical training effectively. Secondly, that workplace supervision/PALT will develop the remaining skills after admission.

A compressed PLT program may be particularly problematic for students who:

- Completed law degrees before the new skills requirements are implemented;
- Completed degrees at institutions with limited practical skills infrastructure;
- Have little or no meaningful workplace experience;
- Come from jurisdictions or backgrounds with fewer professional networks; or
- Intend to practise in smaller, regional, community or less structured workplaces.

The acquisition of practical competence requires repetition, feedback and time to absorb the importance of professional expectations. Interviewing, advising, drafting, negotiation, ethical decision-making and file management cannot be properly developed through a single short exposure. This is consistent with known drivers of professional risk. Insurer data identifies poor communication, inadequate legal knowledge, document errors and systems failures as leading causes of claims. These are precisely the areas that require structured, repeated and supervised training. Reducing pre-admission training while increasing reliance on workplace learning risks exacerbating, rather than addressing, these risks.

There is a risk that a four-week model will merely test whether students can perform limited simulated tasks under controlled conditions, rather than provide a sufficient opportunity to interrogate whether the graduate has developed reliable early professional judgment.

Piddington therefore submits that PLT Standards should not impose a single short-form minimum that becomes the default model for all providers. The framework should permit different accredited models, including longer, immersive and practitioner-led programs that can demonstrate strong outcomes.

Historically, Piddington’s PLT teaching staff have come to observe without fail, marked transformations in graduates across the duration of Piddington’s , in effect, 10 month learning program. Many arrive uncertain,

nervous and lacking foundational practical skills—they are ‘green’ in the truest sense. But over time, they are observed to develop capability, confidence, professional networks and a quiet assurance that they can enter practice and function effectively. The progression is not incidental; it is the product of sustained exposure, repetition and feedback. It is difficult to see how this necessary phase of nurtured development might be replicated within a compressed four-week model.

We invite you to re-consider how professional and intellectual development of this nature could be demonstrated in such a shortened time frame.

We note a view expressed in consultation that, in the context of cost-of-living pressures, if students cannot afford to undertake longer periods of workplace experience, it follows that they cannot reasonably be expected to undertake longer PLT coursework. Piddington does not agree with this expressed equivalence.

Workplace experience and PLT coursework place fundamentally different demands on students. Workplace experience is typically undertaken during standard business hours and for the majority of students in Australia may be unpaid or poorly remunerated, requiring students to forgo income or reduce paid work. By contrast, PLT coursework can be structured flexibly around employment and other commitments. In Piddington’s model, for example, coursework is delivered through a combination of evening sessions, periodic intensives, and monthly in-person days, allowing graduates to maintain employment whilst completing the program.

Accordingly, the financial and practical barriers associated with extended workplace experience are not directly comparable to those associated with PLT coursework. Treating them as equivalent overstates the burden of structured training and understates the impact of requiring students to undertake longer periods of work experience.

A more appropriate response is to ensure that PLT delivery models remain flexible and accessible, while separately addressing the genuine equity and financial challenges associated with workplace experience.

More broadly, the proposal to compress PLT to a 4 week period assumes that any reduction in structured pre-admission training can be offset by learning in practice. However, given the variability in supervision and training environments, this is likely, as we earlier observed, to produce uneven outcomes. The dramatically shorter proposed PLT model risks removing one of the few consistent and structured exposures to practical training that operates independently of the quality of a particular workplace.

In addition, Piddington holds concerns about the cost implications of a four-week intensive course for regional and remote students. Based on modest estimates for accommodation, travel, meals and incidental expenses, the out-of-pocket cost is likely to be in the order of \$5,000. This represents a significant financial burden and does not reduce the overall cost of PLT for this cohort; in practice, it would likely increase it.

Recommendation: Do not reduce PLT to a universal period of four-weeks. But if that is to be the case, do not act to that effect unless and until the Law School and PALT components are operational, assessed and independently evaluated. Retain flexibility for longer, immersive PLT models to continue. Consider funding support for remote and regional students.

Questions 4.1–4.2 – Graduate diploma status and quality assurance

Piddington does not object in principle to PLT being permitted, but not required, to operate at graduate diploma level or equivalent. The formal status of PLT as a graduate diploma is not, in itself, a reliable indicator of quality. It has never been a uniform requirement across all providers, and its prior existence has not consistently

ensured strong outcomes for students. The value of PLT should instead be assessed by reference to the quality of teaching, relevance of content, rigor of assessment and demonstrated graduate capability, rather than AQF status alone.

If PLT is no longer necessarily regulated within tertiary education frameworks, some level of quality assurance will remain important. However, any such framework should be proportionate, flexible and capable of accommodating a diverse range of providers, including smaller, not-for-profit organisations. Overly prescriptive or administratively burdensome requirements risk reducing innovation and limiting the ability of practitioner-led providers to deliver high-quality, profession-connected training.

Consideration could be given to quality assurance measures such as:

- Proportionate provider accreditation and periodic review;
- Expectations around instructor capability and current practice experience;
- Appropriate assessment standards; and
- Mechanisms for student feedback and continuous improvement.

Any framework should focus on outcomes and capability, rather than imposing uniform structures that may not be appropriate across all delivery models.

Question 5.1 – In-person and synchronous delivery

Piddington implements and therefore supports a strong presumption in favour of in-person PLT delivery. However we hold reservations about the practical implementation of a solid 4 weeks of in person PLT attendance.

The practical skills central to PLT, including professional communication, client interviewing, advocacy, negotiation, ethical reasoning and collaborative problem-solving, are strongly supported by in-person learning. Students benefit not only from formal instruction but from observation, informal professional exchange and immediate feedback.

Piddington accepts that synchronous online delivery may be appropriate in exceptional cases, including for regional accessibility, disability, illness, caring responsibilities or other genuine barriers. The exception should not, however, become the ordinary mode of delivery.

While there is a strong case for prioritising in-person delivery, it is important to recognise that in-person attendance does not, of itself, guarantee quality. The effectiveness of practical legal training depends far more on the relevance, depth and diversity of instruction than on physical presence alone. At Piddington, for example, our intensive program draws on over 30 different speakers during a single foundation week, each contributing current, practice-based expertise in their respective areas. This includes not only practising lawyers, barristers and judges/registrars, but also specialists in areas such as artificial intelligence in legal practice, personal branding and professional identity, mental health and resilience, workplace rights and client interviewing skills. This is a deliberate model: no single lecturer/presenter can credibly replicate the breadth of lived professional experience required to prepare entry-level lawyers.

A model that relies on merely one or two instructors delivering content across an entire week/s risks becoming generalised, outdated or disconnected from contemporary practice. In addition, it risks becoming disengaging and less effective.

The focus should therefore be on the quality and authenticity of instruction—ensuring that teaching is delivered by individuals with relevant and current expertise—rather than simply requiring attendance in a physical room.

Piddington’s model is effective because it is grounded in strong professional networks and a genuinely collegiate approach to legal training. It is built on the recognition that no single individual can credibly teach the full breadth of skills required for modern legal practice. Instead, the program deliberately draws on a diverse range of practitioners and experts, each contributing current, relevant and experience-based insight. This diversity of speakers is a necessity as it ensures that participants are exposed to multiple perspectives, practice areas and professional realities, reflecting the complexity of the profession they are entering (and the diversity of the profession itself).

Recommendation: The Standards should require primarily in-person or genuinely synchronous interactive delivery for core PLT skills, with flexibility for accessibility and regional participation assuming the reasonably competent and experienced teachers/mentors and experts can be sourced. But authorities should be cautious about assuming that in person delivery would, in and of itself, improve the quality of PLT.

Questions 6.1–6.2 – Assessment and academic misconduct

Piddington strongly supports a review of PLT assessment standards. Assessment should determine whether students can apply skills in context, not simply whether they can describe legal concepts or complete written tasks in isolation. Rigorous assessment should include:

- Authentic simulations based on realistic matters;
- Oral and written components;
- Assessment of professional judgment and ethical reasoning;
- Drafting tasks based on imperfect client facts;
- Opportunities for feedback and re-performance;
- Clear rubrics aligned with the skills schedule; and
- Moderation to ensure consistency between assessors and providers.

Piddington also supports clearer guidance on reporting academic misconduct where misconduct may bear on suitability for admission. This is particularly important as the use of generative AI increases. Students should be taught appropriate professional use of technology, but dishonest or undisclosed use in assessment must be treated seriously.

Recommendation: Assessment in PLT should be anchored in authentic, practice-based tasks that test whether a graduate can perform as an entry-level lawyer in realistic scenarios. The framework should move away from theoretical or process-driven assessment and so, require consistent moderation, feedback and re-performance. It should also establish clear expectations around academic integrity, including the use of generative AI, with mechanisms to ensure that misconduct relevant to admission is identified and addressed.

Questions 7.1–8.1 – Workplace experience

7.1 - Piddington holds a significant concern about accepting 15 days as the national minimum workplace experience requirement, if the broader model shifts more practical training away from PLT and into post admission practice.

This issue is compounded by the broader structure of the proposed reforms. As more responsibility for training is shifted into the workplace, the adequacy of that workplace experience becomes increasingly important. A

minimal pre-admission exposure, combined with reliance on post-admission learning, assumes that all workplaces are capable of providing meaningful training. In reality, this is highly variable, and a low minimum threshold risks placing pressure on employers to undertake foundational training themselves.

A 15-day minimum may reduce barriers to admission, but it is a very limited exposure to professional practice. It is also significantly lower than the practical placement requirements in many other regulated professions. While direct comparisons between professions must be approached carefully, the contrast is stark: teaching, nursing, social work, occupational therapy, psychology, pharmacy, medicine, dietetics, engineering, architecture and accounting- all require substantially greater periods of supervised practical experience, ranging from 60 days to 130 days. Relegating the minimum standard for entry lawyers to the lowest period is out of alignment with the complexities of modern legal practice which match, if not exceed, those of the other professions mentioned.

Comparison to other regulated professions:

In assessing the proposed reduction of pre-admission workplace experience to 15 days, it is important to distinguish between pre-registration training and post-registration supervised practice, as most comparable professions adopt a two-stage model.

Across professions such as teaching, nursing, social work and allied health, pre-registration training typically includes substantial, structured and assessed placement, commonly in the range of 60 to 130+ days. This is followed, in many cases, by a further period of formal supervised practice prior to full registration (for example, medical internship or pharmacy internship programs), which operates within a defined framework and with clear competency expectations.

The legal profession already reflects a version of this two-stage model, comprising:

- Pre-admission practical legal training (including workplace experience), and
- A period of restricted practice post-admission, during which supervision is required.

However, these two stages are not interchangeable. The pre-admission component is the only point at which training is structured, curriculum-linked and consistently assessed across all entrants. By contrast, the post-admission supervised practice period is not standardised, varies significantly depending on the employer, and does not guarantee exposure to core areas of practice or consistent supervision quality.

Reducing pre-admission workplace experience to only 15 days would therefore place legal training well below comparable professions at the point of entry, while increasing reliance on unstructured, variable workplace learning to develop core competencies. This represents a significant shift in where and how competence is expected to be developed, effectively transferring responsibility from an education and training framework to individual employers, without corresponding safeguards.

In comparative terms, a 15-day requirement aligns more closely with entry-level vocational placements than with the expectations of regulated professions involving client risk, professional judgment and ethical responsibility.

8.1 - If the policy premise is that practical competence develops in practice, then the workplace experience requirement must be more than a token exposure. At a minimum, the Standards should require structured tasks, clear supervision expectations and meaningful reflection.

Piddington supports updating the Standards on PLT Workplace Experience to provide clearer guidance on:

- The kinds of tasks students should undertake;
- The minimum exposure to client communication, drafting, file management, ethics and professional conduct;
- The role of supervisors;
- Feedback and reflection requirements;
- Limits on purely administrative work being counted as qualifying experience;
- Student protections against exploitation; and
- Complaint pathways where workplace experience is not appropriate.

Recommendation: The proposed minimum of only 15 days of workplace experience, is untenable. It materially understates the level of exposure required to develop foundational practical skills and is inconsistent with a proposed reform model that otherwise shifts training into the workplace. It is also materially lower than the practical training requirements in comparable regulated professions, and should be reconsidered accordingly.

Question 11.1 – Workplace experience while studying a law course

11.1 - Piddington supports allowing relevant work undertaken during a law degree to count toward workplace experience *but only* if the minimum workplace experience is materially higher than 15 days. However, in our experience, this must be approached with caution and supported by a structured and discretionary framework.

Under the current model, PLT providers can permit a limited proportion of the workplace experience requirement to be completed prior to PLT. This discretion is exercised on a case-by-case basis, informed by a review of the student’s work experience record and JDF, plus an assessment of whether the work undertaken meets the required Standards in both substance and supervision.

This approach reflects a practical reality: while some students undertake meaningful legal work during their degree, much of what is described as “work experience” is variable in quality and often limited in scope. Without careful oversight, there is a real risk that administrative, observational or poorly supervised work is treated as equivalent to structured training.

Accordingly, Piddington considers that any model which allows pre-admission work to count toward workplace experience should include:

- Independent verification and documentation of the work undertaken;
- Clear alignment with the required Standards, including evidence of substantive legal tasks;
- Appropriate supervision and opportunity for feedback; and
- A limitation on the proportion of pre-PLT experience that can be credited, unless a higher threshold can be justified through demonstrated quality and depth of experience.

Importantly, pre-admission work should not be treated as a wholesale substitute for structured PLT or supervised workplace training. It is most effective when used as a supplement to, rather than a replacement for, formal training.

Without these safeguards, there is a real risk that the workplace experience requirement becomes nominal, further reducing structured exposure to practice at a time when the broader model is already shifting training away from pre-admission programs.

Recommendation: Pre-admission workplace experience should be permitted only on a discretionary and limited basis, subject to verification and demonstrated quality. It should supplement, not replace, structured training and should not be relied upon to materially reduce the overall workplace experience requirement.

Question 12.1 – PLT providers to assist finding workplace experience opportunities

Piddington supports this proposal. It already undertakes this role as part of its program. It should be noted that our ability to do that is assisted by operating within a smaller market and with relatively small cohorts (with only one intake PLT cohort each year), which allows for more direct engagement with both students and the profession.

We acknowledge that this model may not be readily scalable for larger providers or cohorts. That said, there are practical and proportionate ways in which providers can support students to access opportunities. For example, curated job and placement updates, distributed through regular communications, can be an effective and low-burden mechanism. Piddington currently does this on a smaller scale through its Piddington Dispatch, which is circulated twice monthly.

A flexible approach that recognises differences in scale and resourcing between providers is therefore preferable to a prescriptive requirement. At the same time, there is a clear expectation that providers should take reasonable steps to support students to access workplace experience, particularly where those providers have the scale and resources to do so. This support should be proportionate and genuinely facilitative, such as providing curated opportunities and connections, rather than creating additional financial barriers. Charging students additional fees (typically \$500) to assist with securing placements risks undermining equity and access, particularly where students have already paid significant course fees.

However, while we support this initiative, we feel that if the minimum workplace experience is reduced to 15 days that it will prove harder for providers to be able to source these opportunities. Law firms and CLCs will be less willing to take on students if they know that they may only be interested to check their 3 week placement box. This would be compounded by us having to offer multiple streams per year; while we can successfully place students now, that is on the basis that we run one cohort per year, not several.

Questions 9.1–10.2 and 21.1–21.2 – Supervision and supervisor capability

Piddington strongly supports the development of supervisor guidance and a broader regulatory review of supervision during workplace experience and supervised legal practice, especially if the 15 day workplace experience is accepted to be the ongoing minimum.

This is one of the most important issues in the proposed reform. The model relies heavily on the workplace as a training environment. However, supervision across the profession is highly variable. Some early career lawyers receive excellent mentoring and feedback; others receive little structured teaching at all.

Good supervision is not simply checking work before it goes out. It requires the supervisor to:

- Select appropriate tasks;
- Explain context and risk;
- Provide feedback that develops judgment;
- Model ethical and professional conduct;
- Teach file management, communication and client care;
- Monitor workload and wellbeing; and

- Create opportunities for gradual progression in responsibility.

The proposed model cannot succeed if supervision remains an assumed competence rather than a trained capability. Practitioners may be excellent lawyers but inadequate teachers. That distinction matters.

Training for supervisors should include:

- How adults learn in professional settings;
- Giving effective feedback;
- Supervising drafting and advice work;
- Ethical supervision and responsibility for client matters;
- Supervision in hybrid or remote environments;
- Cultural safety and psychological safety;
- Responding to mistakes and underperformance; and
- Supervising early career lawyers without simply using them as production labour.

A consistent concern raised in stakeholder discussions is the capacity of small and medium-sized practices, which comprise the majority of the profession, to support structured training and supervision of early career lawyers. These practices often operate with limited resources and significant commercial pressures, and already face challenges in delivering consistent, high-quality supervision. The proposed model places greater reliance on post-admission, workplace-based training at the same time as reducing structured pre-admission preparation. This change would shift a larger share of the training burden across to environments that are, by the Committee's acknowledgement, least equipped to deliver it. Without clear parameters, minimum standards or support mechanisms to improve supervision and training within these settings, the reforms likely just entrench variability in outcomes, rather than address the problem.

Recommendation: Supervision reform should be treated as a central pillar of PLT reform, not an ancillary issue. A working group should develop minimum supervision standards, training resources and possible regulatory mechanisms.

Questions 13.1–19.1 – Post-Admission Legal Training (PALT)

Piddington supports structured post-admission training in principle. There is real merit in delivering some practical training during the first two years of practice, when early career lawyers have live matters, supervisors and a practice context.

However, the proposed PALT model is not yet sufficiently developed.

If PLT is substantially reduced, PALT would become the central replacement mechanism. It cannot therefore be designed as any mere light-touch add-on to existing CPD offerings.

The reform model appears to assume that practical competence will naturally develop through exposure to work. While this may occur in well-supported environments, it cannot be assumed on a wholesale basis across the national legal profession. When unaccompanied by structured training and consistent quality supervision, “learning on the job” is an unreliable mechanism for developing professional competence.

It is our view that several issues relating to PALT require further elaboration and development:

a) PALT must not become CPD by another name

The consultation materials emphasize that PALT is intended to be different from CPD. That distinction must be made real through design and marketing to stakeholders. PALT should include structured learning outcomes, assessment, feedback and progression. Physical or online attendance alone, should not satisfy the requirement.

b) Fifteen hours per year may be insufficient

Fifteen hours per year may provide a useful foundation, but it is unlikely to be sufficient if PALT is expected to replace substantial components of pre-admission PLT. The sufficiency of 15 hours depends on what is delivered by the reforms to be implemented within law degrees and a re-modelled PLT course, the quality of workplace supervision and the level of assessment required. These are difficult assessments to make without a more detailed explication of PALT content.

c) Practice-area selection needs safeguards

Piddington supports practice-area aligned training. But early career lawyers should not be forced into an overly narrow area of legal practice specialisation too early. A balance is needed between relevance to current work and a more generalized level of exposure to transferable professional skills.

d) Assessment must be authentic

PALT assessment should be practical and context-specific. It should assess the ability to apply professional judgment to real or realistic scenarios, not simply a completion of quiz questions or reflective statements.

e) Regulator approval is necessary

Piddington supports the approval of PALT content and providers by the regulator responsible for issuing practising certificates. If PALT is linked to practising certificate conditions or progression to unrestricted practice, there must be consistent regulatory oversight.

f) Funding and workplace burden must be addressed

In this respect, the reform does not remove the cost of training but shifts it. The reduction in pre-admission PLT is offset by increased post-admission obligations, including course fees, supervision time and reduced productivity. This redistribution of cost may have unintended consequences, including making early career lawyers less attractive to employ, particularly in smaller practices. In addition to their normal leave allowances, firms may be less keen to give early career lawyers additional leave.

The proposed reform is often framed as reducing cost. In reality, it may shift cost from pre-admission PLT to early employment. PALT will require course fees, time away from work, employer support and supervisor involvement. This may disproportionately affect small firms, sole practitioners, regional practices, government employers and community legal centers.

g) Teaching workforce is a critical unresolved issue

A major practical issue is the availability of suitably qualified teaching staff. The proposed model requires practical skills teaching in universities, intensive PLT delivery and PALT across multiple practice areas. This will require a significant pool of lawyers with current or recent practice experience who also have the skill, time and willingness to teach.

There is no obvious existing pool of such instructors. Good practitioners are invariably, busy. Teaching takes preparation, skill and judgment. Goodwill may support occasional contributions, but this is not a stable workforce strategy for a national reform model.

If existing university academic staff are used to deliver the practical components, there is a serious question as to how the new model will differ from current arrangements. If practising lawyers are expected to deliver it, the model must confront availability, remuneration, training, consistency and burnout.

The scale of this workforce requirement has not been quantified. Without a clear understanding of how many suitably qualified practitioners will be required to deliver practical skills teaching across law schools, PLT and PALT nationally, it is difficult to assess whether the proposed model is operationally deliverable. This is not a marginal issue, it goes to the feasibility of the reform proposal as a whole.

Recommendation: PALT should not be implemented until there is a detailed framework for provider approval, assessment, supervision integration, funding, compliance and teaching workforce capacity.

Question 22.1 – Implementation timing and transition

Piddington has significant concerns about the proposed implementation timeline.

The proposed model appears to commence with a new short-form PLT in 2028, which is the same time as law schools begin embedding practical skills. That creates an obvious transitional misalignment. For several years, many graduates entering PLT will not have completed a law degree under the new practical skills framework.

This raises the prospect that PLT providers will need to operate parallel models:

- One model for students who have not received embedded practical skills training in their law degree; and
- Another shorter model for students who have completed a reformed degree.

That will create complexity, administrative burden and potential unfairness between cohorts, not to mention increased costs in addressing the hiatus cohort. It may also place pressure on employers and PALT providers to remediate gaps that should have been addressed before admission.

The proposed reforms involve simultaneous changes across law school education, PLT and post-admission training. The interdependence of these elements creates significant sequencing risk, where the effectiveness of one stage is contingent on the successful implementation of others. This increases the risk of gaps in training during the transition period.

Instead, a staged implementation model looks a more preferable approach. Short-form PLT should not become the standard until the first cohorts who have completed their as reformed law degrees are actually reaching the PLT stage and the effectiveness of those reforms has been evaluated.

In addition, time needs to be allowed for regulators to approve the re-accredited courses, especially as they will have multiple courses to review at one time. The Piddington Society's last PLT re-accreditation took 9.5 months (30 October 2023 to 14 August 2024) for the Legal Practice Board of WA to review and approve, during which time we functioned on an interim approval basis.

Piddington accepts that the PLT framework should not remain static and that periodic review is necessary. However, a further review within five years risks pre-empting a meaningful evaluation of the proposed reforms. On the current timeline, a student commencing a law degree today may not complete the full training pathway, including PALT, before the framework is reconsidered again. This creates uncertainty and may limit the profession's ability to properly assess whether the reforms have achieved their intended outcomes.

In our view, a non-staged implementation will create great uncertainty for students. It may result in a drop in international and regional students who will be dissuaded from taking large financial and life risks to undertake a law pathway. A staged approach will allow for clear messaging about the changes, whereas a non-staged approach will leave the profession and early students more confused. Currently, many first-year law students don't appreciate that they need to undertake PLT before being eligible to be admitted as a legal practitioner and hold a practice certificate, let alone embark on another training process post admission.

In addition, little information is discernible as to the implications for students who have obtained a law degree in an overseas jurisdiction. It is unclear how (if at all) these reforms might affect them being admitted to practice in Australia.

Recommendation: Implementation should be staged. Existing or transitional cohorts should not be required to undertake a shortened PLT model that is designed on the assumption that they have already received some new level of practical skills training at university. Perhaps address this by considering a trial in one Australian jurisdiction only as a test model.

h) Summary of key recommendations

- a) Do not adopt a universal four-week PLT model. If it is adopted, do not so unless and until law school practical skills reforms and PALT are fully implemented, assessed and independently evaluated.
- b) Retain flexibility for longer, immersive, practitioner-led PLT programs, recognising that different delivery models can achieve high-quality outcomes and should not be displaced by a uniform minimum standard.
- c) Reconsider the proposed minimum of 15 days workplace experience, which is not fit for purpose and materially understates the level of exposure required to develop foundational competence.
- d) Strengthen the skills framework by:
 - i. distinguishing between pre-admission, transitional and post-admission competencies;
 - ii. introducing standalone categories for Equality and Wellbeing and Legal Reasoning and Analysis; and
 - iii. ensuring skills are assessed through applied, realistic tasks rather than topic coverage.
- e) Anchor assessment in authentic, practice-based tasks, with moderation, feedback and re-performance requirements, and clear standards for academic integrity, including the use of generative AI.
- f) Treat meaningful supervision as a central pillar of reform (rather than a box ticking exercise), including the development of minimum standards, training and guidance for supervisors across the profession.
- g) Develop a detailed and workable PALT framework well before commencing any other reform implementations, including:
 - iv. provider approval and regulatory oversight;
 - v. assessment requirements;
 - vi. integration with workplace supervision;
 - vii. funding and cost implications; and
 - viii. teaching workforce capacity.

- h) Address the teaching workforce constraint explicitly, including availability, remuneration, training and sustainability of practitioner-led delivery.
- i) Avoid over-prescriptive quality assurance frameworks that risk excluding smaller, high-quality, practitioner-led providers, and instead adopt proportionate, outcome-focused standards.
- j) Stage implementation carefully, ensuring transitional cohorts are not required to undertake shortened PLT without having received reformed law school training.
- k) Recognise and mitigate the risk of increased variability in graduate competence, particularly where training responsibility is shifted into inconsistent workplace environments.

i) Alternatives to reform/current model

Rather than starting with a framework and attempting to make content fit within it, Piddington considers that reform should begin with a more fundamental question: what is actually required to educate and develop a competent lawyer?

In our view, the starting point should be: how do you progressively build professional judgment, reliability and safe practice capability? Those qualities are not developed through isolated or compressed exposure to practice. They develop through careful sequencing, repeated exposure to professional tasks, meaningful supervision, feedback, reflection and gradually increasing responsibility over time.

Piddington considers that several core design principles should underpin any future PLT model.

First, effective legal training is not achieved through PLT alone or workplace learning alone. Competent lawyers are developed through carefully sequenced shared responsibility across law schools, PLT providers, workplaces and post-admission training.

Secondly, professional judgment develops over time. Entry-level lawyers require repeated opportunities to practise skills, refine judgment and build confidence across different contexts. Repetition and feedback are therefore critical components of effective training.

Thirdly, workplace supervision is highly influential but inherently variable. Strong supervision environments can significantly enhance professional development. However, poor supervision environments do not automatically improve simply because greater responsibility for training is shifted into the workplace. This variability must be recognised within any reform model.

Fourthly, assessment standards are central to maintaining professional quality. Assessment should be authentic, rigorous and consistently moderated, with a focus on the application of skills and professional judgment in realistic contexts.

Finally, legal training must recognise that lawyers are not merely technicians. Effective preparation for practice must also develop communication skills, ethical judgment, resilience, professional identity and the ability to work effectively with clients, colleagues and the courts. In practice, lawyers most commonly encounter difficulty not because they have forgotten legal doctrine, but because of failures in communication, judgment, supervision, organisation, systems management and workload management. Equipping lawyers to deal with the realities of practice is therefore critical and should not be overlooked.

Ultimately, in Piddington's view, competent lawyers are not produced by law schools, PLT providers or workplaces operating in isolation. They develop through a carefully designed and properly sequenced system of shared professional formation.

In practice, this would support a staged and integrated training pathway involving practical skills development during the final stages of law school, a longer-form and flexible practitioner-led PLT program delivered over several months with integrated workplace experience and authentic assessment, followed by structured and supervised post-admission training focused on developing practice-specific competence and professional judgment.

j) Concluding Observation

Piddington supports meaningful reform of PLT and agrees that the acquisition of practical competence should develop across the continuum from law school to early practice. However, the current reform proposal, with respect, risks reducing structured pre-admission training before the replacement model has identified, developed and established the necessary delivery capacity in universities, workplaces, supervisors and PALT providers.

The key issue is not whether training should be more practical. It should. The key issue is whether the proposed system is sufficiently designed, resourced and regulated to deliver that practical training consistently across the profession.

The central risk in the proposed model is not that it changes PLT, but that it redistributes responsibility for training across systems that are currently uneven in quality, underdeveloped or undefined. Without addressing these structural issues, the reforms risk reducing consistency in graduate capability and, ultimately, the quality of legal services provided to the public.

Unless those structural questions are first resolved, there is a real risk that the reforms will redistribute responsibility for training without any assurance of redressing the underlying problems of quality, consistency, cost and access.