Feedback Form: Review of practical legal training

Respondent details

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Are you responding as (select one):

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

Jurisdiction (select one)

☐ National
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UNSW Sydney is responding as both a university law school which offers qualifying degrees in NSW and a PLT provider which offers the Graduate Diploma in Legal Professional Practice both in NSW and interstate to sponsored cohorts in the graduate programs of national law firms. Accordingly, we have selected two jurisdictions.

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

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

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

☒ Yes

☐ No

Responses to consultation questions

<table>
<tr><th colspan="2">Law courses</th></tr>
<tr><td>1.1</td><td>Do you support the proposal for the LACC to amend the Accreditation Standards for Australian Law Courses to require law courses to demonstrate how they have included practical teaching and training of the practical skills identified at Appendix F, with appropriate assessment?

No. Although UNSW is open in principle to the addition of skills to the accreditation requirements for law schools and is confident that we currently do, or may be able to, address many areas of practical skills development in our law courses, as the skills schedule in Appendix F is presently written, UNSW does not support the proposal.

The issues with the skills schedule must be resolved for law schools to proceed to implementation with confidence. This is just as true for accrediting bodies and independent assessors of law schools given the reliance which they need to be able to place on the skills schedule. We contend that as currently stated, the skills schedule is not fit for purpose and will render accreditation highly complex, time-consuming and uncertain.

The specific issues with the skills schedule are detailed in response to question 1.2. In short, these issues are that the schedule :
is overly prescriptive on the performance of tasks, rather than the attainment of general professional competencies or graduate attributes on completion of their academic qualification;
lacks clarity about the content of several skills, affecting the feasibility of them as the subject of an ‘assessed simulation’;
overlaps with existing Priestley 11 requirements – most obviously in the area of ethics and professional responsibility; and
contains inconsistent messaging about the need to demonstrate acquisition of ‘practical knowledge and skills’ by ‘assessed simulation’, while simultaneously stating that assessment of all skills need not be required.
As formal accreditation requirements, the skills schedule needs to be reconsidered with a focus on both the overarching goal and what implementation needs to look like for both law schools and accrediting bodies to fulfil their respective obligations.

In addition to the above, UNSW also acknowledges and shares the more general concern about the proposed addition to law school accreditation as expressed in the submission of the Council of Australian Law Deans. Insufficient consideration has been given to the implications for the academic component of legal education, both as to the time that may be traded-off for deeper instruction and ‘simulated assessment’ of skills and also as to the necessary changes to the staffing profile of law schools, particularly those with global reputations as teaching and research-intensive universities.</td></tr>
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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? Further development and refinement of the proposed skills schedule is necessary for it to be fit for purpose in the accreditation assessment of law schools. In its current form, the schedule adopts a level of specificity more characteristic of vocational professional training than academic legal education. While many of the identified competencies are valuable in professional practice, the proposal risks blurring the distinction between the broader intellectual purposes of a university law degree and the more practice-oriented objectives of post-graduation professional training. For example, requirements relating to file management, time recording, billing practices and client communication obligations (record keeping and matter management (i)-(iv)) concern operational aspects of legal practice ordinarily developed in supervised professional experience. Although such skills might be appropriately introduced as part of experiential learning opportunities such as internships and clinics, they are not matters that obviously warrant formal inclusion and assessment within the core academic curriculum. The skills schedule should be redrafted to focus on high-level capabilities and forms of knowledge that are appropriately developed within legal education and, where suitable, assessed in the university setting. These include broad professional competencies such as communication, teamwork and collaboration, professionalism, cultural competence, adaptability, and resilience. Such skills are well established as legitimate components of contemporary legal education and are commonly developed through clinical legal education, mooting, group projects, simulations and role plays within the core curriculum and electives. Additionally, such an approach would be strongly aligned with international comparators. The lack of acknowledgment of the skills statements of other common law jurisdictions, let alone any parity of approach or an express justification of what has been put forward by reference to relevant literature or empirical study, are unsatisfactory aspects of the reform proposals to date in Australia. So far as the current articulation in Appendix F is concerned, there is a tension between the articulation of a number of the topics of 'practical knowledge and skills' as based on a need to 'understand' rather than an 'ability' or other measurable verb and the apparent requirement from the table that all of them will require an 'assessed simulation'. This is further complicated by the comment in the preface to the skills schedule that not 'all of the listed matters necessarily have to be *assessed* by universities, although the extent to which they were assessed could be considered as part of the accreditation process'. Any addition to the accreditation requirements should be expressed with sufficient clarity so that law schools are able to design for compliance with

	confidence and the work of assessors and accrediting bodies is straightforward and consistent. That is not the case with several of the entries in the skills schedule. Specifically: **Communication (vi)(a)** – the array of different modes of communication is excessively prescriptive if linked to 'assessed simulation' and also draws distinctions between forms that are not so obviously aligned with contemporary practice (eg. letters vs emails; telephone calls vs online calls). **Communication (vi)(b)** – this skill may be seen as excessively prescriptive if linked to 'assessed simulation'. Law schools have in fact long been emphasising generic skills of effective communication to diverse audiences – including in our classrooms given the changes in student profile in recent decades – and it would be surprising if any are unable to point to stated graduate attributes or program learning outcomes that do not already adequately address this issue. **Client relationship (i) & (ii)** – both are expressed as 'understand the need to…' rather than as matters of 'practical knowledge and skills' per se that would lend themselves simply to demonstration through an 'assessed simulation'. Further, both should already be covered in law school ethics courses that are compliant with the accreditation requirements as stated in the *Legal Profession Uniform Admission Rules*, Sch 1, Pt 2, cl 13. If it is felt that the current wording of the latter is inadequate as to 'taking account of' the client's circumstances, we submit that should simply be added to cl 13(c) in the Priestley 11. **Collaboration** – university law schools already offer many opportunities (including as assessable course tasks) for students to develop collaborative skills. But it is difficult to conceive of how some of the additional aspects contained in the comments section of the skills schedule can be meaningfully developed and assessed in any operational sense (or externally assessed for the purposes of accreditation). In particular, 'the team nature of legal practice from working with support staff, to working with more and less experienced colleagues and working with counsel' will be extremely challenging to design for in any Priestley 11 subject – especially at scale. **Record-keeping and matter management (i), (ii) & (iii)** – all three are expressed as 'understand the importance to…'. It will be challenging to address these as matters of 'practical knowledge' through an 'assessed simulation', rather than a matter included in course content and assessed through other means (eg, hypothetical problems in an examination setting). **Record-keeping and matter management (iv)** – while time-management and prioritisation are the only aspects of this category expressed as an 'ability', the comments alongside it reveal some ambivalence in its inclusion in the skills schedule. These skills are indeed central to successful study towards a law degree. If the decision to include as an item in the skills schedule is no more than for it to be 'touched upon' in three Priestley 11 courses, it is unclear how this is to be done by 'assessed simulation'. That is especially true if the central purpose for inclusion is to address its 'ethical dimension, in particular as an aspect of not

	over-servicing clients'. Lastly, there is overlap here with **Ethics, Professional Responsibility and life as a lawyer (iv)** – which is itself accompanied by a comment concerning fee estimates that might be practical knowledge far better attained through workplace learning. **Ethics, Professional Responsibility and life as a lawyer** – several elements of this category duplicate existing accreditation requirements for the Priestley 11 subject (especially (i) & (iv)) and essentially all of them cover topics which are common in law school courses on ethics and professional responsibility. The overlap with 'academic areas of knowledge' is pronounced and it is preferable that revisions be made to the *Legal Profession Uniform Admission Rules*, Sch 1, Pt 2, cl 13, rather than repackaging these topics as 'practical knowledge and skills' in a separate accreditation schedule. **Responsible use of technology** – while this inclusion is undeniably important, it is surprising that no acknowledgment is made of the existing higher education regulatory environment. Furthermore, the current expression of the 'practical knowledge and skill' is deficient in that it does not actually express a requirement that graduates have the *ability* to use AI technology effectively. This is already a skill that the profession expects of law graduates and yet it is, at best, left implicit in a skill expressed as 'understand appropriate use'.
1.3	Would law schools be able to implement these changes by the beginning of the 2028 academic year, as proposed? It has been confirmed to NSW law schools that no later implementation date will be accepted in that state. UNSW will not repeat its account of why this timeline is challenging for university law schools. We simply acknowledge the submission of the Council of Australian Law Deans in this regard. But additionally, our responses at 1.1 and 1.2 highlight that a critical factor in the difficulty of the proposed timeline is that the proposed skills schedule requires further development to be an effective instrument for curriculum redesign and accreditation. Until that is progressed and finalised, the significant steps law schools will need to take toward implementation (the full scope of which were acknowledged by the NSW LPAB Interim Report (March 2026, p 19) but also adding the necessary internal governance processes to effectuate these) cannot even 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? In principle, UNSW supports updating the PLT Competency Standards to align with a clarified skills schedule that meets the needs of the legal profession. However, as currently drafted, Appendix F does not meet the necessary objectives to support meaningful and appropriate change in the effectiveness of PLT. Any revised standards should: • start from a well-researched and well-consulted view of what the profession needs from a newly admitted lawyer, tempered by what can realistically be developed prior to entering practice (and to what standard). • clearly distinguish 'admission-ready' competencies from those better developed post-admission (to avoid overloading PLT and duplicating PLT/CPD expectations). • be framed at an appropriate level of generality for all entrants (that is, not be practice-area specific), while still enabling meaningful assessment. • support consistent interpretation across providers (reducing variability in what 'competent' means at admission). • be developed alongside assessment guidance, to avoid standards becoming aspirational but unenforceable. While we appreciate the criticism of the existing PLT Competency Standards, their detail provides a sound starting point for reform and consideration could be given to adapting and modernising those competencies for the intended purpose, rather than simply replacing them with a less specified skills schedule. International benchmarking should necessarily be a part of this process, to be conducted collaboratively with the profession and PLT providers.
2.2	Do you suggest any amendments to the categories or skills set out in the skills schedule at **Appendix F**? We do not suggest any amendments to the categories. As concerns the skills themselves, please see the feedback provided at 1.1, 1.2 and 2.1.
2.3	Do you think that the following areas need to be specifically included in the skills schedule, either as categories or identified knowledge and skills: i. Working with clients from culturally and linguistically diverse backgrounds? ii. Preventing and addressing sexual harassment?

iii. Awareness of obligations under anti-money laundering/counter-terrorism financing regulations?
iv. Awareness of ADR options, or specific skills relating to ADR?
v. Negotiation skills in a wider range of settings, or other specific settings?
vi. Drafting any other types of legal documents? If so, what types of documents?

From the consultation paper, it is not especially clear how this list was generated (noting also that it differs from the items considered but not adopted at the end of the NSW LPAB's skills schedule in Appendix F). For the reasons given below, the composition of the list is confusing in parts, and this is not alleviated by the invitation to nominate the matters as either 'categories' or 'identified knowledge and skills' in the skills schedule.

Our more specific comments on the list are as follows:

i. This is obviously an important professional skill but would be more appropriately addressed as inherent in the development of sophisticated communication skills. Indeed, it is amongst a broader range of attributes identified at **Communication (vi)(b)** already in the skills schedule (noting our comment about this in response to 1.2).
ii. It would be useful for the LACC/LSC to note the significant obligations on universities since the *National Higher Education Code to Prevent and Respond to Gender-based Violence 2025* entered into force on 1 January 2026. These include the provision of detailed training to students.
iii. Anti-money laundering (AML) and counter-terrorism financing regulation are already brought to the attention of students within the current UNSW PLT course, and it is appropriate that all students have some awareness of how these obligations affect legal practice. However, it appears inconsistent to include this type of practice-area specificity within the proposed skills framework if other forms of practice-area specificity are simultaneously being removed from the curriculum. Additionally, and consistent with our earlier feedback in 1.2, care should be taken to avoid elision between the category of 'practical knowledge' and 'skills' so that matters of substantive law are added to the accreditation requirements of law schools but not via a thorough and consultative revision of Schedule 1 of the *Legal Profession Uniform Admission Rules*. This question tends to underscore the difficulty of holding the present discussion divorced from consideration of the suitability of the Priestley 11.
iv. It is surprising to see 'awareness of ADR options' suggested as a standalone 'skill'. Once more, the language employed is not that which supports demonstrable acquisition of a skill but instead duplicates the inclusion of ADR within the contents of the Civil Dispute Resolution area in the Priestley 11. If practical experience in ADR methods is the aim, this should be stated and perhaps elaborated on.
v. This suggestion starkly highlights the issues with the current articulation of the skills schedule, which is overly prescriptive rather

	than pitched at the development of core competencies to support students develop the skills that they will need in different contexts. The schedule stipulates two settings in which students should demonstrate the 'ability' to negotiate in an 'assessed simulation'. For the LACC/LSC to ask whether other settings should be added is a strong indication that the schedule suffers from a focus on 'tasks'. Too rigid an insistence on approaching skills of 'negotiation' or 'mediation' through formal settings ignores that these are embedded throughout the everyday interactions of legal practice. Most calls, discussions with clients, and interactions with practitioners on the other side involve elements of negotiation, relationship management and informal dispute resolution. Framing these skills only within formal negotiation suggests that they are discrete events occurring only in specialised contexts, rather than everyday professional skills used continuously throughout legal practice. vi. The final suggestion on drafting attracts the same comment as for negotiation at (iv) about the need to revisit the design and level of the skills schedule. But additionally, the topic of drafting must directly engage with the use of AI-generative technology in legal practice (see our comment under **Responsible use of technology** in 1.2). The schedule does not acknowledge that multiple AI legal platforms will be used in the creation of documents and that new lawyers will be using those tools from their first day on the job. So, the point is not about adding more specific types of documents to draft but to ask what lawyers will need to understand about legal drafting generally to effectively and appropriately use and enhance the basic documents that will now be routinely created by large language models. To be clear, this is not to say drafting is a redundant skill at all – but how it is taught needs to respond to the contemporary reality of how it is carried out now in practice.
2.4	Should the option for graduates to undertake Supervised Workplace Training as a way of completing PLT be retained? As Supervised Work Training is not currently a pathway utilised in NSW, we do not feel sufficiently qualified to comment in detail on the effectiveness of SWT models. This is also one of the areas where further research may be required to determine how effectively such models operate in other jurisdictions and whether they achieve consistent educational as well as professional and equity outcomes.
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? Given our earlier comments on the need for further development of the skills schedule, it is not possible to answer this question in detail. Subject to a reworking of the skills schedule to a higher-order articulation of professional competencies, UNSW is generally supportive of the proposal for

	LACC to update the Standards on PLT Workplace Experience to ensure alignment of the workplace experience with reference to those skills (Proposal 8). But it should be noted that an update of those Standards will need to address the implications of Proposal 11 to allow workplace experience to be completed earlier than under current PLT arrangements, including at some unspecified stage of law school study. That greater flexibility will necessarily influence the extent to which certain tasks might be required of the Supervised Workplace Training. The Standards will now apply to students undertaking work experience in a broader window of time along the legal education continuum. In turn, this may further reinforce the need to recast the skills schedule to a more generic suite of competencies in order for Proposal 11 to be operable in practice.
2.6	Should there be any other amendments to Supervised Workplace Training? Additional comment on this is provided in response to the later set of questions on 'Workplace Experience'.

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? It is necessary to first acknowledge that what the NSW LPAB has proposed and what is suggested by this question is in fact a course of five weeks in length. The stipulation of a full week of assessable preparation must be recognised as a week of asynchronous course work. In its entirety, this is a blended delivery, five week course and should be recognised as such. Given the current statement of the skills schedule and our view in section 1 that this requires further development, it is difficult to definitively answer this question. The course duration should be determined by its educational purpose and scope. Although it is tempting to assume that a condensed course would presumably be popular with students, significantly the LACC/LSC's own commissioned study makes this far from clear. Figure 16 of the *National Practical Legal Training Research – Survey Research Report* (p 35) shows that opinion is roughly divided on this question, with 45% of graduates saying they would prefer less time spent on coursework and 39% favouring the status quo. But the commentary in the Urbis report does not refer to the further 11% who voiced a preference for 'slightly/considerably more' coursework. In combination, 50% of the respondents to LACC/LSC's survey did not favour a reduction in coursework time (raising questions as to the Urbis report's conclusion that there is a 'generally negative perception of the usefulness of PLT coursework'). As such, the LACC/LSC's proposed adoption of the NSW LPAB model would benefit from a stronger justification. Compressing practical legal training into a four-week intensive (with a week of preparation) is a very significant step that risks prioritising 'exposure' to skills over genuine capability development. In our view, not only is this move not strongly supported by the Urbis data on student sentiment, but there has been very little attempt to substantiate the pedagogical benefits of a shorter course. Lastly, the course design front-ends the preparation material for a whole week and is then followed by fully in-person delivery. It is not clear why there cannot be a more blended integration of these instruction modes, which would afford students the opportunity to take stock or break down the synchronous in-person delivery with targeted asynchronous development periods over the same five week course duration.
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?

	To repeat, what is actually being proposed is a five week course comprising one week asynchronous delivery and four weeks of in-person delivery. The NSW LPAB and LACC both acknowledge the availability of asynchronous online delivery as a legitimate dimension of law degrees and the same should apply to ensure accuracy as to the time commitment of the proposed PLT course. This question overlaps with 3.1 and the response given there is also applicable here. Without taking a firm position on optimal duration until the skills schedule is further developed and finalised, it would be nevertheless beneficial for serious engagement with the actual pedagogical issues of course duration to occur. From our perspective, the proposal needs to provide: • time for repeated skills practice cycles involving: attempt, feedback, reflection, adaptation to a new or more complex problem, and re-attempt, all of which are essential for supporting the development of competence rather than mere exposure to skills; • assessment and approaches that meaningfully test applied capability, judgement and professional decision-making without becoming rushed or reduced to 'box-ticking' exercises; • sufficient time for students to practise skills across varied contexts, clients and legal problems; and • clarity on post-admission supervision requirements that would support reducing PLT to a shorter course given that such learning is inherently workplace-variable and dependent upon the quality, consistency and availability of supervision, which differs significantly across practice settings, employers and jurisdictions. This variability was precisely why PLT was introduced. To now reduce PLT on the assumption that competency gaps will later be addressed in practice risks shifting responsibility for foundational professional capability from the education system to employers in an uneven and inequitable way for graduates. Lastly, should the work experience actually *precede* PLT (in an adoption of Proposal 11) then the justification of a truncated PLT needs to also expressly respond to this new feature.
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? For university providers, this is a material structural change: • AQF alignment underpins program design, framing of learning outcomes, assessment policy settings, and the conferral of an award/qualification. • If PLT is not at an AQF level, universities may need alternative mechanisms to credential learning, with flow-on governance implications. • If TEQSA oversight is removed, robust profession-led quality assurance becomes even more important. It is questionable that such a robust

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design would be able to be readily created within the profession and it is not immediately apparent why there should be duplication when there is an existing quality process in place (see 4.2).
As is acknowledged in the Consultation Paper, PLT that is not AQF-compliant will result in students being ineligible for FEE-HELP. This is an extremely important aspect of the whole reform proposal. Equity impacts should be explicitly considered, particularly for students experiencing financial hardship and regional/remoteness impacts and students without an employer to support them. The way these impacts have been addressed to date has not provided sufficient reassurance that the interests of these students is being prioritised. The size and diversity of the current law student body is unprecedented and impediments to sections of its membership being able to obtain entry to the profession should be minimised. Concern about the current PLT model on this same score may be legitimate, but it should not be replaced with a new approach which simply reframes or entrenches those same impediments – and certainly does not exacerbate them.

It should be recognised that the market will determine the dominant PLT model and this will align with the minimal requirement. Optimism that smaller, more bespoke and jurisdictionally-specific offerings will not be impacted by student enthusiasm for shorter courses is misplaced. National consistency is a key objective, but even if that is achieved, the idea that some PLT providers will be able to sustain models that offer more than the minimum required of the PLT Competency Standards denies the commercial realities.
The suggestion that has been floated of a Graduate Certificate qualification that can comprise PLT and PALT while ensuring access to FEE-HELP is not realistic – at least for university providers. The long timeframe over which the PLT and PALT components would be completed (approximately 2 years) and the proposed model for PALT would not be approved by internal governance mechanisms that ensure AQF compliance.
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<tr><td>4.2</td><td>
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?
If PLT is not within TEQSA/AQF settings, additional safeguards should include:

clear minimum standards for curriculum design, assessment integrity, and staff qualifications/practice experience;
requirements for assessment moderation/calibration across assessors and cohorts;
regular external review/audit of assessment artefacts and outcomes against stated competencies;
transparent reporting on completion rates, assessment outcomes, and student experience indicators (as appropriate); and
clear complaints/appeals processes and mechanisms for regulator oversight where quality concerns arise.

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	More broadly, caution should be exercised before dismantling an existing national PLT framework without clear evidence that the proposed replacement would improve quality and not negatively impact access. The current framework is nationally recognised and embedded within existing regulatory and educational systems. Given that, the question arises as to why such a framework should be substantially replaced rather than strengthened and more consistently enforced. A more proportionate approach would be to improve standards, supervision, assessment integrity and consistency within existing systems, while retaining the benefits of an established national framework that is already understood by students, universities, employers and admitting authorities nationally. It remains unclear why this was not attempted before the proposal of more radical reforms.
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? UNSW supports a move towards greater synchronous delivery of content. However, a model requiring four weeks of in-person learning following one week of online learning does not adequately accommodate spaced learning principles and is unlikely to support diverse learning needs effectively. Consideration should instead be given to a more extended blended model that allows students time for preparation, reflection, skills practice and the completion of written assessable work across the course of the program. Any revision to PLT delivery should focus less on whether teaching occurs 'in person' or 'online', and more on the quantity and quality of *meaningful* contact hours, whether delivered synchronously in-person or online, and on identifying the most effective methods for achieving the intended learning outcomes. Student reports of satisfaction with in-person learning over online delivery does not itself provide evidence-based support for the proposition that face-to-face delivery alone produces superior learning outcomes. We would all be able to recount experiences of content delivered in person that failed to support effective learning. What matters is whether the learning experience is engaging, interactive, psychologically safe, collaborative and structured in a way that allows for repeated skills practice with meaningful feedback and reflection. In-person learning can suffer from many of the same problems often attributed to online learning when poorly designed, including presenteeism, disengagement, reluctance to participate, inadequate preparation, and isolating learning experiences. Any exemptions framework for in-person learning will require clear criteria regarding eligibility and evidentiary requirements in order to promote consistency across providers and jurisdictions. Additionally, appropriate quality assurance mechanisms will also be necessary to ensure that exempt students receive an equivalent skills-learning experience, rather than a reduced or diluted version of the program. This may create substantial logistical, resourcing and financial pressures for providers.

	Operationally, the nature of practical legal skills teaching may require providers to run separate fully online and fully face-to-face streams. A partially hybrid classroom, where some students attend physically and others participate remotely, is very likely to be pedagogically suboptimal for many forms of practical skills training. Such arrangements are likely to increase staff workload, complicate timetabling and assessment processes and reduce opportunities for effective observation and assessment of student participation and performance.
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? We support a review to ensure PLT assessments are rigorous and genuinely measure competence against a well-researched framework of skills, knowledge and attributes that make for readiness to enter the legal profession. We note that there have been concerns raised about resubmission of assessment tasks. However, it seems these are largely borne of unfamiliarity and a misunderstanding of the purpose and advantage of resubmissions as part of a well-designed authentic learning experience within a competency-based assessment regime, as well how such a process is enacted with integrity to mirror the way learning occurs in legal practice. UNSW has implemented robust competency-based assessment and grading in numerous courses across the university, including in the Faculty of Law & Justice, and not only in our PLT Program. Competency-based assessment requires well-designed, purpose-oriented, and scaffolded hurdles (ie, competency has to be attained on all course tasks). Therefore, assessment task quality itself matters as much as the processes around assessment (including resubmission). Without a strong assessment framework, with opportunities for students to demonstrate skills in context, and without accompanying scaffolded formative learning tasks, students will not be able to demonstrate competency. PLT assessment should remain varied and reflect the realities of legal practice. Lawyers do not work only through oral interactions. Over-reliance on those forms of assessment risks reducing opportunities for students to practise drafting, receive detailed written feedback, revise their work and develop professional judgement over time. Those processes are a very important part of how lawyers actually learn in practice. However, it is not very clear how a suitably broad assessment scheme aligns with and is supported by the proposed model of a four week in-person course. It is perhaps not surprising that this wholly different assessment objective and practice is one that graduates may be dismissive of following the highly competitive atmosphere of law school. But the real world of practice is very different from law school and the assessment methods in PLT can support that transition. Failing students in PLT subjects and requiring them to redo the subject does not achieve anything more educationally than the current approach of rejecting inadequate work, possibly several times, and requiring them to continue

	to develop their skill until they can attain the requisite standard. As an additional consideration, given the costs to students that are involved in the LACC/LSC proposed model (not only course fees but time away from employment and, for some, travel and accommodation), a change away from competency-based assessment to require failure after a single attempt and possibly course re-enrolment just imposes more barriers to those lacking sufficient resources.
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? UNSW supports greater clarity on the reporting of academic misconduct in the PLT Standards to address the inconsistencies in current reporting of which it is aware.

Workplace experience	
7.1	Do you support the LACC retaining the requirement for a minimum of 15 days of workplace experience prior to admission? UNSW supports the retention of the existing minimum requirement of 15 days of workplace experience prior to admission. We note that this has related benefits to the operability of Proposal 11. However, while we agree with the LACC/LSC proposition that 15 days does not impose an oppressive burden on students or the profession, it would be good to understand the extent, if any, to which the Urbis data has been given weight in Proposal 7. It appears to offer a reasonable basis for thinking through this question more critically. Figure 27 of the *National Practical Legal Training Research – Survey Research Report* (p 44) shows that strong support for 'the same amount' (46% - and presumably for many respondents they completed more than the minimum 15 days) and 'slightly/considerably more' (30%). Urbis reports that those who completed the minimum workplace experience 'were significantly more like [sic] to state that more time should be allocated (49%)'. We note that the LACC/LSC agrees with the NSW LPAB that the option to complete more than 15 days of workplace experience should remain. But it is disappointing that the Consultation Paper does not engage with the LACC/LSC's own commissioned research in its discussion of this question. Retaining the option of longer work experience in principle will not address the commercial realities that will face programs in which longer work experience accounts for a proportion of volume of learning to make up a Graduate Diploma. Pursuant to our response at 4.1, we anticipate that this model will essentially become unviable.
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? Subject to our earlier feedback on the current skills schedule, UNSW supports the proposal for greater guidance. We note the concern that supervisors are unclear about the intended learning outcomes. To assist with this sort of uncertainty, our own PLT program provides supervisors with a guide to support them in their supervision. This includes: • Definitions (what is a day, who can supervise, etc) • Nature of work to be undertaken, including examples of legal work and examples of skills that students may acquire. • Feedback tips. • Copies of forms required from students and supervisors at the end of the placement.

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? UNSW supports this liaison with stakeholders to better guide and support supervisors.
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? Given the proposed compacting of PLT courses and a greater reliance on stages of the legal education continuum on either side, UNSW submits that the absolute absence of any structured training of the legal profession in supervision that the LACC/LSC acknowledges (pp 49-50) requires the creation of a framework with appropriate training attached. This will be relevant not only to workplace experience but the critical improvement of the post-admission learning experience. Such requirements may be received as an imposition but have precedents in other professions.
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, but given the significant nature of the current proposals, and the LACC/LSC's own commissioned research emphasising the importance of workplace learning, this question should not be preordained as one of training only for 'lawyers who wish to improve'. As is often the case, those who self-select are likely to already be thoughtful and effective supervisors. The challenge is how to raise the standard of supervision overall across the profession. We note that some materials (such as those provided by the Victorian Legal Services Board + Commissioner) already exist to support early-career lawyers which are relevant to law students who also need supervision pre-admission.. In addition, the UNSW Centre for the Future of the Legal Profession has recently reported on a Think Tank discussion amongst the profession on improvements in supervision and what is needed to support this (*Making Supervision Work for Everyone*, March 2026).
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?

	UNSW supports recognition of workplace experience, including experience obtained prior to completion of the law degree (clinical courses, paid work, internships, volunteering). We recommend that experience be credited up to two years before graduation from qualifying law degrees, to ensure skills and learning gained from the experience are relatively current. We note the interrelationship of this question with those at 7.1 and 8.1.
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? UNSW welcomes further guidance from the LACC about providers' obligations to assist students in sourcing workplace experience opportunities. However, we would request that the potential resourcing implications of whatever is proposed be considered. Additionally, while connections can be made between student and firm/organisation, not all students are a suitable match, so student expectations in this regard need to be managed. We would welcome a corresponding focus on incentives for the profession to provide workplace experience opportunities. Obligations on providers to secure opportunities will not alone be effective if there is a reluctance on the profession. In particular, we are concerned by informal feedback that 15 day placements will be less attractive to the profession than those which have been offered for longer.

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? UNSW supports increased post-admission legal training for new lawyers. We do so with the view that such training should achieve some consistency in post-admission support should supervisees find that they need more training beyond what their organisation and supervisor can provide, rather than simply as a way to reduce the length of the PLT course. If the 15 hour requirement is intended to be only formal learning then we note that it will likely mean three days of PALT, rather than two, because break times will be needed.
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. This proposal can only work if it is implemented as a condition on practising certificates.
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? It seems uncontroversial to recognise the bar practice course as an acceptable alternative for PALT. But there are more complex scenarios that were raised in the LACC/LSC stakeholder roundtable with PLT providers. These included graduates who had completed PLT but then gone to work in fields other than law and also those who went on to further study, especially at overseas universities. How should these be handled, given the efficacy of PALT is that it was conceived as adjacent to the early career lawyers' professional development in their workplace?
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? We support practice-area PALT electives in principle, but only if the model specifies the earliest permitted point to undertake PALT and the assumed learner level and the kinds of work/tasks the learner has (or has not) been undertaking in practice. Timing/sequencing will necessarily affect curriculum design. For example: • If taken after 3+ months in a practice area, many proposed activities may be too introductory and fail to extend learning.

	• If taken very early post-admission, the same activities may be too advanced or insufficiently scaffolded (and may require more supervision and protected practice opportunities than can be assumed). • Learning needs differ markedly between 1–3 months, 3–12 months, and second-year lawyers; a single "one size fits all" elective risks missing all cohorts. Without differentiation (eg, streams, optional extension tasks, or tiered assessment), the course is likely to be pitched at an "average" level that fails to provide effective and meaningful development for participants. These issues have been insufficiently recognised in the reform proposals to date but are critical not only to PALT itself but the achievement of the overall objective of improved practical knowledge and skills development.
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? Lawyers should have the autonomy to choose the PALT that meets their training needs. As such, it might be useful to provide early career solicitors with a framework for determining (in conjunction with their supervisor) their training needs so that they can seek out the most suitable options.
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? There is insufficient information about the possible restrictions and adjustments that would be made to the other parts of the learning continuum to answer this question. From a diversity of profession and access to justice perspective UNSW would urge caution on putting in additional conditions on practising certificates that will make sense in the context of one form of practice but not another. As a simple example, a condition about meeting with clients unsupervised may make sense in large firms but not in rural, regional, remote or community-based practices.

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? We refer to our answer above at 5.1. The same considerations apply to PALT delivery.
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? UNSW supports the proposition that the content and providers of PALT offerings should be approved by a quality assurance body that not only looks at inputs, but also the educational quality and constructive alignment between the learning outcomes sought, the learning materials and the assessment. If not a national body, then high coordination for consistency across state and territory-based bodies will be a priority. It is important that there is sufficient quality assurance to ensure that PALT does not simply become an extension of the CPD industry.
19.1	Do you support the proposal that PALT should incorporate rigorous assessment? Do you have any views on the parameters for this requirement? UNSW supports rigorous assessment to demonstrate knowledge/skills attainment in PALT. We do so consistently with the position stated in response to 6.1. Satisfaction of PALT should not be by mere attendance only. Authentic assessment design (mirroring real-world tasks) will enable assessment of capability and professional judgement. The parameters will need to be suitable for the learner’s stage of experience which is variable, and as explained at 15.1, this will be a challenge. Assessments must relate strongly to the sessions themselves because learners may move on, change practice areas or even be inexperienced in the area of the particular PALT subject.

Clinical legal education	
20.1	Do you support the Committees considering options for the inclusion of clinical legal education as a component of PLT? Clinical Legal Education provides a rich learning experience and UNSW has provided law students with the opportunity to experience this through the Kingsford Legal Centre for 45 years. CLE is one way we anticipate students being able to satisfy the 15 days of workplace experience as per Proposal 11 and this is a welcome inclusion of CLE as a component of PLT. CLE obviously involves learning with real clients. This has benefits for students but also risks for clients if students are not well supervised, therefore growing this option at scale is costly for PLT providers and an attempt to cater to heightened demand may put strain on existing clinics. It is also unclear that CLE will offer opportunities for the further development of all aspects of the skills schedule – although this is certainly not the case with its specific contents at present. There are very serious questions of operability, looking at the size and shape of effective CLE programs, to examine here. The process for any further exploration of this idea, and the participants who should be involved in this process, require a highly considered and genuinely co-designed approach. It should not be the declaration of an end goal tied to an unrealistic implementation timeframe. While the LACC/LSC has suggested a four week CLE course following from the four week PLT course (actually five weeks – see response to 3.1), given the complexity entailed, it is worth asking why four weeks of simulated practice experience has not been considered as an option? Throughout the reform process, the preference has been to reach for major structural change and reorganisation of responsibility over a more direct approach to addressing concerns about quality. But the suggestion that CLE should be dramatically overhauled and expanded to fix problems in the PLT sector, that may stem largely from specific providers, is by far the most dramatic illustration of this.
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 Based on our nearly 50 years of CLE provision, which includes a combination of mandatory and elective participation at different points of our law degree, UNSW answers this question by favouring an optional engagement in CLE for the purpose of PLT. If CLE was introduced as a mandatory component of PLT and students are able to claim credit for it in their law degree, the LACC/LSC will need to clarify whether it intends the one CLE experience to count towards two distinct stages of the legal

	education continuum. If it is optional, why should there not be an equivalent option available for students to take up (including paid employment or internship in a law firm)? That may or may not be for course credit and so a distinction enters the equation, but would those other experiences satisfy the 20 days workplace experience provided by CLE – or only the 15 days requirement? As these questions indicate, greater uncertainty and additional regulatory arrangements will almost certainly follow any attempt to pull CLE further into the thicket of PLT reform.
20.3	If clinical legal education is optional, should completion of clinical legal education satisfy the requirements for PALT? No, based on our understanding of the objectives of PALT. CLE tends to focus on particular types of legal work. Therefore, the PALT objective to upskill early practitioners in their *chosen* practice area in the first two years cannot be met by CLE alone.
20.4	Who should be responsible for delivering and supervising clinical legal education? Consistent with the preceding responses, UNSW does not welcome the prospect of disruption of CLE as a specialised university-based legal education offering that involves collaboration with partner organisations, most typically in, but not limited to, the community law centre sector.
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? UNSW does not support mandatory CLE as a solution to concerns the LACC/LSC has about the quality of PLT. But as a provider of all stages of the legal education continuum – qualifying academic degrees, including CLE experiences, PLT and professional development education through UNSW EDGE – we would welcome an invitation to participate in a working group on how CLE might be utilised more broadly for skills development.

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? Yes. We refer to our responses at 10.1 and 10.2 which we regard as applicable to all stages of professional supervision – whether of law students or early career lawyers.
21.2	Do you support legal profession regulators establishing a working group to develop additional guidance and resources for supervisors of lawyers as part of their supervised legal practice and consider potential regulatory reforms? UNSW considers this welcome and highly appropriate given the nature of the proposed reforms.

Implementation timing	
22.1	Do you support the proposed transitional arrangements and implementation timeframe set out at Proposal 22? In addition to our response at 1.3, UNSW confirms that we do not support the implementation timeframe in Proposal 22 of a synchronised start in 2028 for all aspects of legal education that are in scope for change. The list of areas in Proposal 22 makes it self-evident that what is being proposed is nothing less than the substantial reorientation of academic and early career professional legal education in Australia – to be achieved in 18 months' time despite the reform process itself having produced no settled outcomes at this time. In responding to this questionnaire, the complexity of course redesign, the interrelated nature of different moving parts, the operational constraints, the high resourcing needs, and the impact on equity groups have all assumed a sharp focus. All those issues require clarification and resolution. UNSW accepts the need for reform and is committed to further engagement with all stakeholders to optimise and future proof legal education in Australia. But it is not possible to meet the proposed timeframe with any responsible commitment to quality.