

Submission to the Legal Services Council's Admissions Committee and Law Admissions Consultative Committee

Review of Practical Legal Training

Introduction

The Victorian Legal Services Board and Commissioner (**VLSB+C**) welcomes the Legal Services Council's Admissions Committee and Law Admissions Consultative Committee (together, '**the Committees**') review of practical legal training (**PLT**) and supports its focus on improving the quality, consistency and accessibility of legal education and training. We appreciate the opportunity to contribute and signal our interest in actively participating further in this reform work as it progresses.

The experience of early career lawyers (**ECLs**) in practice is a key area of focus for us, and we have recently released an Early Career Lawyer Capability Framework to provide clarity on the capabilities and skills we expect lawyers to develop during supervised legal practice (**SLP**). To inform the development of the Framework, we surveyed ECLs and their supervisors about their experiences. Our research into ECLs, including their experience of SLP, indicates gaps and opportunities in the current system that are broadly consistent with the issues identified in the review. In particular, our research suggests that there is scope to strengthen the clarity, consistency and quality of training and capability development across the early stages of legal practice.

The proposed reforms outlined in the consultation paper are complex, national in scope, and directed to the full continuum of legal education and training. We think this is appropriate given the significance of the reforms, the importance of legal education (pre and post admission) in skill development and confidence building, and the expectation that lawyers continue to commit to professional development and capability building over the course of their career. While we have completed the Committees' feedback form, we do not have a conclusive view on the proposals at this stage. Our comments are preliminary and intended to inform next steps.

The proposed post-admission legal training (**PALT**) reforms are of particular interest to the VLSB+C, given their relevance to the regulatory framework we administer. This applies to ECLs, post admission, and includes existing requirements for SLP and continuing professional development (**CPD**). We suggest as a first step that we work together to agree on the capabilities we expect at each of the key stages of legal education: university, admission and unrestricted practice (post SLP). We appreciate the work that has already gone into potential solutions. However, an agreed understanding of what outcomes we want from the different legal education components is a critical step that is required before final positions can be formed.

In addition to our responses in the attached feedback form, this submission sets out five overarching considerations to inform the next stage of the review:

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1. The need for clear learning outcomes and capabilities to be developed across each stage of legal education and training
2. The importance and value of maintaining nationally consistent admission standards
3. The opportunity presented by these reforms to increase diversity within and ensure equitable access to the profession and support wellbeing
4. The need for, and value of, a more iterative and evidence-based approach to reform
5. The importance of supporting supervisory, management and leadership skill development in the profession.

Our role as the legal regulator in Victoria

The Victorian Legal Services Board (**the Board**) and the Victorian Legal Services Commissioner (**the Commissioner**) are the independent statutory authorities responsible for regulating the legal profession in Victoria in accordance with the *Legal Profession Uniform Law (Uniform Law)*.¹ Both authorities are accountable to the Victorian Parliament. The Board and the Commissioner effectively operate as one body, the VLSB+C.

The Board is responsible for several regulatory functions, including making decisions about lawyers' practising certificates, overseeing law practices' trust accounts and external interventions into law practices, and making applications for the removal of lawyers' names from the Supreme Court roll where appropriate.

The Commissioner is responsible for receiving, managing and resolving complaints about lawyers' conduct, including conduct outside of legal practice. The Commissioner has investigative and prosecutorial powers, which may lead to disciplinary action, and plays a central role in educating both the profession and the community about issues relevant to legal services delivery and regulation.

The VLSB+C also undertakes research and policy development to strengthen legal practice and ethics, improve access to justice, and protect and empower consumers.

Overarching recommendations and areas for further consideration

1. Clear learning outcomes should be defined across the legal education and training continuum

Each stage of legal education and training should build on the one before it, so law students, graduates and ECLs progressively develop the capabilities needed for independent legal practice. Reforms should also reflect contemporary approaches to adult learning and professional development.² The consultation paper provides a helpful starting point, including its description of the current continuum and proposed skills schedule (**Appendix F**). There would, however, be value

¹ As set out in Schedule 1 to the *Legal Profession Uniform Law Application Act 2014* (Vic).

² For an overview of adult learning theory in the context of CPD, see: Chris Humphreys, [Review of Continuing Professional Development for Victorian Lawyers](#) (Report, 2020) Victorian Legal Services Board + Commissioner, 21.

in further consultation to refine and reach consensus on the intended learning outcomes for each stage: legal studies, PLT, SLP and any future PALT requirements, and to use those outcomes to guide the design of law courses, PLT and PALT. We believe it is also important to discuss the value of CPD as an ongoing obligation of practice. We have had a sustained focus on encouraging lawyers to engage in reflective practice and undertake CPD that will help them address capability gaps they identify. For example, we have produced guidance on getting the most out of ethics CPD at each stage of a lawyer's career.³

Our research supports the need for clearer learning outcomes across the legal education and training continuum, particularly during SLP. In our 2023 and 2024 surveys, ECLs and their supervisors said they wanted greater clarity about the capabilities to be developed during the SLP period.⁴ Our 2025 Lawyer Census similarly suggests that, while many supervisors consider ECLs to have sufficient substantive legal knowledge, some see gaps in practical skills and in the application of knowledge in practice.⁵ This is broadly consistent with Queensland Law Society research which found that some ECLs enter practice without the critical skills required for competent practice.⁶

This research points to the value of clearer and more aligned learning outcomes at each stage of the continuum, so that students, graduates and ECLs, as well as employers and supervisors, have shared and realistic expectations about the capabilities to be developed. The VLSB+C's Early Career Lawyer Capability Framework, which sets out the capabilities expected during SLP, may provide a useful reference point for that work. We discuss our research further in the feedback form at questions 2.1, 10.2, 17.1 and 21.1.

2. Nationally consistent admission standards should be maintained

The VLSB+C strongly supports the principle that admission standards should remain nationally consistent and is pleased to see this reflected in the Committees' review. Reforms should therefore be progressed through nationally agreed settings – including through LACC's national admissions framework (including relevant standards) and, for Uniform Law jurisdictions, through the Uniform Law and Uniform Admission Rules. These reforms will require legislative change to implement. All reforms affecting post-admission training and supervision must be led by the LSC working in close consultation with local regulatory authorities, through coordinated reform of the Uniform Law framework and should, as far as practicable, also be pursued on a nationally consistent basis.

³ Victorian Legal Services Board + Commissioner, '[Ethics CPD self-assessment tools](#)', 2020.

⁴ Victorian Legal Services Board + Commissioner, '[Early career lawyers' experiences of supervised legal practice: 2023 survey](#)', 2023; Victorian Legal Services Board + Commissioner, '[Supervisors' experiences of supervising early career lawyers: 2024 survey](#)', 2024.

⁵ Victorian Legal Services Board + Commissioner, '[Lawyer Census data 2025](#)' [unpublished research materials], 2025.

⁶ F Cantatore, T Atwill and R Field, [The job readiness of law graduates and entry level solicitors in private practice: Final report](#), Queensland Law Society, 2022.

Different admission standards across jurisdictions will create uncertainty for graduates and newly admitted lawyers, weaken confidence in what admission signifies, and undermine the coherence of a national legal profession. National consistency supports common expectations about the threshold for entry to practice, facilitates mobility, and promotes confidence in the quality of legal services and the administration of justice.

3. Promoting equitable access, diversity and wellbeing

Reform presents an opportunity to promote equitable access to the profession, support diversity and foster wellbeing. Reform settings should be designed not only to avoid creating new barriers, but to improve accessibility, affordability and inclusion. However, several of the proposals, as currently framed, may work against these objectives:

- Cost was a central concern for the students surveyed. If PLT is no longer delivered as an AQF-recognised qualification, students may no longer be eligible for FEE-HELP or other government income support, potentially increasing affordability barriers. Additional clinical legal education requirements in PLT may reduce time available for paid employment. Any assessment of affordability should consider the total cost of legal education and training, rather than PLT in isolation. While PLT may become less expensive, those savings may be offset if additional costs arise later through PALT or other requirements.
- Mandating that PLT and PALT be undertaken entirely in person, except in exceptional circumstances, may adversely affect students who live in regional or rural areas, have a disability, or have caring responsibilities, as noted in the consultation paper. For some students, in-person attendance may require relocation and additional expense. In our view, online learning, when delivered synchronously and interactively, can support quality while also improving access to and diversity in the profession.

Finally, we suggest the Committees consider embedding the foundations of sustainable legal practice and wellbeing into the earliest stages of legal training – law courses and PLT – via these reforms. Research conducted across the Uniform Law jurisdictions demonstrates that poor lawyer wellbeing poses a significant risk to the profession across Australia, including the potential to adversely affect ethical decision-making.⁷ These reforms present an important opportunity to foster wellbeing and strengthen the conditions that support sound ethical decision making from the outset of entry into the profession.

4. A more iterative and evidence-based approach to reform is needed

We are concerned the paper presents a largely settled reform package, rather than a set of options for development and testing, despite the complexity of the proposed changes, the significant

⁷ Holmes, V., Webb, J., Tang, S., Ainsworth, S., & Foley, T, [Lawyer Wellbeing, Workplace Experiences and Ethics. A Research Report](#) (Report, 2025) Victorian Legal Services Board + Commissioner, the Law Society of New South Wales and the Legal Practice Board of Western Australia.

implications for licensing authorities and the need for jurisdiction-specific implementation planning.

In particular, the paper appears to proceed on the basis that a single model, largely based on the NSW LPAB Interim Report, could be adopted nationally. While NSW's work provides a valuable reference point, it cannot be implemented as a national solution without further consultation and consideration of jurisdictional differences. For example, the consultation paper states the VLSB+C uses its discretionary condition power to require lawyers seeking a principal practising certificate to undertake a practice management course. This is incorrect. A further period of active consultation with licensing authorities to understand the current state in the different jurisdictions is required.

The short time frame for consultation on these reforms also means the VLSB+C has not had sufficient time within the consultation period to consult broadly across Victorian stakeholders, test the proposed reforms, and consider what is feasible to implement without the need for legislative change. Our initial response is that some of these proposals cannot proceed without legislative changes to the Legal Profession Uniform Law.

The proposed implementation timeframe is ambitious, particularly given the breadth of the reforms, the need for coordinated action across jurisdictions and institutions, and the need for legislative and rules-based change in respect of PALT. We therefore encourage the Committees to adopt an iterative, evidence-based approach, with foundational questions such as learning outcomes and the purpose of each stage addressed before detailed design settings are finalised.

5. Supporting supervisory, management and leadership skills in the profession

Our 2024 survey of ECL supervisors identified that less than half of supervisors (41%) had undertaken external training in supervision.⁸ We consider supervisory training to be important to the success of these reforms. We support the Committees' proposal for a working group on supervision and would welcome the opportunity to participate in that working group.

We recommend the Committees and working group investigate how supervisory, management and leadership skills for existing supervisors and future lawyers can be improved throughout the learning continuum, with foundations commencing in university. Drawing on insights from the lawyer wellbeing Systems Theory of Change approach, we also recommend that accountability for effective supervision of ECLs be considered at the entity level, rather than only at the individual lawyer level, where there are intense pressures and competing demands.⁹

We are cognisant that reforms that increase structure, compliance obligations or training requirements across pre and post-admission stages may also have unintended effects on the capacity and willingness of employers and supervisors to support ECLs. If additional supervisory or

⁸ Victorian Legal Services Board + Commissioner, '[Supervisors' experiences of supervising early career lawyers: 2024 survey](#)', 2024.

⁹ Victorian Legal Services Board + Commissioner, '[Lawyer Wellbeing Systems Theory of Change](#)' (Report, 2025).

Victorian Legal Services **BOARD + COMMISSIONER**

training requirements increase time, cost or administrative burden, some employers - particularly small, medium-sized and regional firms - may be less willing or able to offer PLT placements, graduate roles or supervision. These risks should be carefully considered in designing reforms intended to strengthen training and supervision.

Conclusion

We thank the Committees for the opportunity to provide feedback and hope these comments are helpful. Phoebe Lindner, Senior Policy Adviser, would be pleased to discuss this submission further or provide additional information if required. Phoebe can be contacted at

[REDACTED]

Yours faithfully

[REDACTED]

Fiona McLeay
Victorian Legal Services Board CEO and Commissioner

13 May 2026

Attachment: Feedback Form

Feedback Form: Review of practical legal training

Respondent details

Name: Fiona McLeay, Victorian Legal Services Board CEO and Commissioner

Organisation (if applicable): Victorian Legal Services Board and Commissioner (VLSB+C)

Contact details: If you have any questions please contact Phoebe Lindner, Senior Policy Adviser, [REDACTED] or Jasma Johnson-Singh, A/Manager, [REDACTED]
[REDACTED]

Are you responding as (select one):

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

Jurisdiction (select one)

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

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

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

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

- ☒ Yes
- ☐ No

Responses to consultation questions

Law courses	
1.1	Do you support the proposal for the LACC to amend the Accreditation Standards for Australian Law Courses to require law courses to demonstrate how they have included practical teaching and training of the practical skills identified at Appendix F, with appropriate assessment? We understand that many universities already incorporate practical elements and clinical legal education into their legal studies coursework.¹ While we recognise that incorporating more practical components into law courses could be beneficial, more work needs to be done to identify the precise practical skills that would be appropriate at the university stage. This should be done as a wholesale consideration of the legal education and training framework and through identifying clear learning outcomes and capabilities for each stage. This work should be informed by adult learning principles and stakeholder consultation. Appendix F lists the practical knowledge and skills expected for admission, but it is not clear which skills should be taught in law courses, and which should be taught through practical legal training (PLT), or how learning is expected to build across each stage. More clarity on the purpose of each stage may help before changes are made to the Accreditation Standards. This need for greater clarity is reinforced by the overlap between Appendix F and the VLSB+C's Early Career Lawyer Capability Framework (ECL Capability Framework), both of which cover ethics, communication, client work, record-keeping and matter management, court processes, advocacy, negotiation, drafting and research. As the ECL Capability Framework is intended to describe skills developed by the end of supervised legal practice (SLP), there should be a clearer distinction between what is expected at the end of a law degree, after PLT, and after SLP. We are keen to assist the Committees by sharing our research and supporting a systems approach to reforms.
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? We suggest the Committee consider incorporating the following: Wellbeing The proposed skills schedule includes some wellbeing-related content, but its current focus is too narrow. The VLSB+C's research suggests poor lawyer

¹ For example, Monash University offers a range of [clinical placements](#), as does [University of Melbourne](#), [Deakin University](#) and [RMIT](#).

	wellbeing can begin early, including during law school, and can affect the quality of legal services and access to justice.² In our view, the skills schedule could address wellbeing more comprehensively using a systems approach. This is outlined in our Systems Theory of Change for Lawyer Wellbeing, which draws on experiences of lawyers and research to highlight that poor wellbeing is driven by a complex interaction of factors across the individual, interpersonal, organisational and system levels.³ The importance of developing skills to support lawyer wellbeing - including reflective practice⁴ - is highlighted in the Theory of Change, and contributes to a positive workplace culture. This is reflected in the VLSB+C's resources, including our ECL Capability Framework and Reflective Practice Template, which are designed to support early career capability development in these areas and our Wellbeing Guidelines for Legal Workplaces. First Nations cultural capability The proposed skills schedule does not include a specific capability relating to First Nations cultural capability. While the communication capability refers broadly to different backgrounds and experiences, it does not clearly address the cultural capability needed to work effectively with First Nations clients and communities. In Victoria, this capability is increasingly a professional expectation, in light of the Statewide Treaty process and the development of the Framework for First Nations Cultural Capability in the Legal Profession. We encourage the Committee to include a specific capability, or refer to an appropriate First Nations cultural capability framework, in an amended skills schedule. Sexual harassment and other challenging behaviours We consider there should be a specific capability relating to respectful behaviours in workplaces and within the profession, including recognising and responding to sexual harassment, bullying and other unlawful or uncivil/inappropriate conduct. The VLSB+C's 2025 Victorian Lawyer Census found that 34% of lawyers had experienced sexual harassment during their
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² See Michelle Brady, [VLSB+C Lawyer Wellbeing Project](#) (Report, 2019) Victorian Legal Services Board + Commissioner; Holmes, V., Webb, J., Tang, S., Ainsworth, S., & Foley, T, [Lawyer Wellbeing. Workplace Experiences and Ethics. A Research Report](#) (Report, 2025) Victorian Legal Services Board + Commissioner, the Law Society of New South Wales and the Legal Practice Board of Western Australia; Alice Catherine King, Georgina Rychner, Nigel J Balmer and Deborah Lawson, [Sexual Harassment in the Legal Profession: Findings from the 2025 Victorian Lawyer Census](#) (Report, 2025) Victorian Legal Services Board + Commissioner; Georgina Rychner, Alice Catherine King and Nigel J Balmer, [Uncivil Behaviours in the Legal Profession: Findings from the 2025 Victorian Lawyer Census](#) (Report, 2026) Victorian Legal Services Board + Commissioner.

³ Victorian Legal Services Board + Commissioner, [Lawyer Wellbeing Systems Theory of Change](#) (Report, 2025).

⁴ See, for example: Michelle Leering, 'Conceptualizing Reflective Practice for Legal Professionals' (2014) 23 *Journal of Law and Social Policy* 83-106; Judith McNamara, Rachael Field, & Catherine Brown, 'Learning to reflect in the first year of legal education: the key to surviving legal education and legal practice' (2009). In Thomas, J (Ed.) *First Year in Higher Education Conference*. QUT Publications, Australia, 1-10.

	careers and 44% had witnessed it, indicating this remains a significant issue in the profession.⁵ In our view, the skills schedule could more clearly support early understanding of respectful workplace standards and reporting pathways, including through a capability focused on contributing to a positive workplace culture. The VLSB+C's ECL Capability Framework includes a capability 'Contributes to a positive workplace culture' with performance indicators: • treats others with respect • understands what unlawful discrimination, bullying, sexual harassment and victimisation are, and options for reporting or making a complaint about this conduct.
1.3	Would law schools be able to implement these changes by the beginning of the 2028 academic year, as proposed? N/A

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, we support amending the PLT Competency Standards. However, as noted in our submission, we consider Appendix F would benefit from further workshopping with relevant stakeholders, including accrediting bodies such as the Victorian Legal Admissions Board. Relevantly, our research (and research from other jurisdictions) broadly supports the need to strengthen practice-readiness at the point of admission. Findings from the VLSB+C's 2023 survey of early career lawyers, 2024 survey of supervisors, and responses to the 2025 Lawyer Census suggest that some early career lawyers enter practice without sufficiently developed practical capability. Key findings include that supervising lawyers: • are concerned about the skill level of the ECLs they supervise, with 40% agreeing that ECLs' insufficient skills and knowledge are a barrier to providing effective supervision during SLP • consider that, while ECLs they had recently supervised had sufficient substantive legal knowledge, some were unable to apply their
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⁵ Alice Catherine King, Georgina Rychner, Nigel J Balmer and Deborah Lawson, [Sexual Harassment in the Legal Profession: Findings from the 2025 Victorian Lawyer Census](#) (Report, 2025) Victorian Legal Services Board + Commissioner.

	knowledge in practice, due to the poor quality of their legal education and lack of opportunity to undertake experiential learning, and - are concerned about the impact of online education on ECLs' communication skills and their ability to form professional networks with peers and mentors.⁶ These findings align with similar evidence from other jurisdictions that: - there is a discrepancy between what ECLs learn through academic and practical legal education and the skills expected of them when they commence practising⁷ - online delivery and a lack of experiential learning opportunities during legal education may contribute to this perceived lack of practice-readiness.⁸ Taken together, the research suggests there is merit in reviewing and strengthening the practical skills expected at admission. However, they also reinforce the need for further consultation and careful design to ensure Appendix F clearly reflects the skills that should reasonably be expected at that stage of professional development.
2.2	Do you suggest any amendments to the categories or skills set out in the skills schedule at Appendix F? At this stage, we are not in a position to comment definitively on amendments that may be required to Appendix F. We note that there is currently overlap between Appendix F and the VLSB+C's ECL Capability Framework and notable differences, as outlined in our response to question 1.2. This reinforces our submission that clearer learning outcomes are needed for each stage of legal education and training – including to reduce unnecessary duplication/overlap – in order to settle the detailed content of Appendix F, and further consultation is required to ensure there is consensus around the capabilities required from ECLs at each stage of their development.
2.3	Do you think that the following areas need to be specifically included in the skills schedule, either as categories or identified knowledge and skills: - Working with clients from culturally and linguistically diverse backgrounds? - Preventing and addressing sexual harassment?

⁶ Victorian Legal Services Board +Commissioner, [Early career lawyers' experiences of supervised legal practice: 2023 survey](#), 2023; Victorian Legal Services Board +Commissioner, [Supervisors' experiences of supervising early career lawyers: 2024 survey](#), 2024; Victorian Legal Services Board +Commissioner, [Lawyer Census data 2025](#) [unpublished research materials], 2025.

⁷ For example, see F Cantatore, T Atwill and R Field, [The job readiness of law graduates and entry level solicitors in private practice: Final report](#) (Report, 2022) Queensland Law Society.

⁸ For example, see M McNamara, 'University legal education and the supply of law graduates: a fresh look at a longstanding issue', *Flinders Law Journal*, 2018, 20(2): 223-255; S Kift and K Nakano, [Reimagining the professional regulation of Australian legal education](#) (Report, 2021) Council of Australian Law Deans.

- 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?

It is important that ECLs have knowledge and skills in these areas. This is reflected in our ECL Capability Framework, where we set out several relevant capabilities that ECLs should develop by the end of their SLP period, alongside performance indicators against which to evaluate capability development:

Committees' proposed area of knowledge/skills	Capability identified in VLSB+C's Framework	Performance indicator in VLSB+C's Framework
Working with clients from culturally and linguistically diverse backgrounds	Communicates clearly and effectively	Tailors their engagement and communication style to meet the needs of different audiences, understanding how individuals' characteristics, experience and background may influence how they give, receive, or comprehend information
	Develops First Nations cultural capability	Uses the <u>Framework for First Nations Cultural Capability</u> in the Legal Profession to identify areas where they need to grow their First Nations cultural capability, and seeks opportunities to build capability
Preventing and addressing sexual harassment	Behaves professionally and exercises good judgement	Demonstrates, professional courtesy, candour, honesty and integrity in dealings with clients, colleagues, the courts, the VLSB+C and others
	Contributes to a positive workplace culture	Treats others with respect; Understands what unlawful discrimination, bullying, sexual harassment and victimisation are, and options for reporting or making a complaint about this conduct
Awareness of obligations under anti-money laundering/counter-terrorism financing regulations	Understands and complies with trust money obligations	Understands and complies with the Legal Profession Uniform Law obligations that apply in relation to the receipt and disbursement of trust money; Understands and complies with their obligation to report irregularities and suspected irregularities in trust accounts via the VLSB+C trust account irregularity reporting form.

	Awareness of ADR options, or specific skills relating to ADR	Manages legal matters effectively	Identifies where early resolution is achievable and undertakes dispute resolution, where appropriate
	Negotiation skills in a wider range of settings, or other specific settings	Advocates effectively for clients	Presents case and negotiates options to compromise when necessary or advantageous for their clients
	Drafting any other types of legal documents	Drafts high quality legal documents	Drafts documents independently, including by adapting precedent documents, template letters and standard file notes that are appropriate to specific client circumstances; Writes clearly and concisely, accurately addressing all relevant legal and factual issues; Drafts legally effective documents that conform with applicable legal and procedural requirements; Carefully reviews and proofreads drafted documents
	We note, however, that these are skills expected to have been developed by the end of the SLP period, not the beginning of legal practice. A lower level of understanding, knowledge and skills across all these areas would be appropriate to expect from undergraduates and graduates undertaking PLT.		
2.4	Should the option for graduates to undertake Supervised Workplace Training as a way of completing PLT be retained? We support retaining Supervised Workplace Training (known as Supervised Legal Training (SLT) in Victoria) as a way of completing PLT. It provides structured learning in a real legal workplace, with supervision, practical experience and paid employment, and appears well aligned with the Committees' focus on practice-readiness. In Victoria, however, access to SLT positions is limited and competitive, and the costs of supervision and training can be a barrier for some employers, particularly smaller firms. The Committees may wish to consider whether there are ways to better support or incentivise employers to offer supervised training positions.		
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? We defer to VLAB on this matter.		
2.6	Should there be any other amendments to Supervised Workplace Training? N/A		

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? We do not have enough information to form a concluded view on the proposed minimum duration of PLT. In our view, any minimum duration, whether four weeks or otherwise, should be evidence-based and set by reference to the practical skills required at admission, and the time reasonably needed to teach and assess them. As noted earlier in our submission, this also depends on first settling the skills and learning outcomes expected at each stage of legal education and training. Without that clarity, it is difficult to assess whether the proposed four-week minimum is appropriate. Additionally, supervisors' ability to take on the additional requirements of PALT and the challenges already being experienced in supervision (as noted in our response to question 21) warrant further exploration prior to the minimum length of PLT being settled.
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? See our answer to question 3.1.
4.1	Do you support the proposal for the LACC to amend the PLT Standards to provide that a PLT course may be, but does not have to be, delivered at a graduate diploma level or equivalent? This proposal requires further consideration. While we do not know the full breadth of the oversight and assurance functions TEQSA currently provides in this context, if that oversight were to be removed, the likely impacts would need to be carefully considered, including whether another body would need to assume some or all of the role currently performed by TEQSA. If PLT is no longer delivered at graduate diploma level or equivalent, students may lose access to FEE-HELP, which could reduce the accessibility of PLT and have flow-on effects for equity and diversity in the profession, if the costs of the courses are high. However, if the proposal is for PLT to be delivered as a 'hands on' skills interactive course, at a low or substantially reduced price point, then this may be appropriate. We do not have sufficient information to form a view at this stage but would welcome the opportunity to discuss this further with the Committees. The proposed changes to PLT are significant and warrant a full cost analysis of all new proposals, with a comparison of those costs to the present model, to ensure the cost and quality are improved by a new model.

4.2	If you support this proposal, would any additional safeguards be required for PLT providers (given they would not necessarily be regulated by TEQSA)? For example, should new quality assurance measures be required in the LACC framework documents? What should those additional measures be? See answer to 4.1.
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? We cannot form a view on this proposal until we have a better understanding of the proposed learning outcomes to be achieved from PLT (see answer to 4.1). Face to face training will help to develop practical skills through active participation and can foster networks between students, building collegiality. We see benefits in this approach. However, requiring PLT to be delivered completely in person (other than in exceptional cases) will reduce the accessibility of PLT for a range of people, including those who live regionally, hold caring responsibilities, or have work or other commitments. As we submitted to the Committees in response to your review of the Accreditation Standards for Australian Law Courses (19 June 2025), online learning, when offered in a synchronous and interactive capacity, can provide quality education, while also balancing access needs and supporting diversity in the profession (see also recommendation 3 in our submission).
6.1	Do you support a review of the PLT Standards to ensure that assessments are rigorous in measuring whether students have developed the required knowledge and skills? If so, do you have any suggestions on how the Standards should be set to ensure rigorous and effective assessment? Yes, we support a review of PLT assessments to ensure they are rigorous and measure whether students develop necessary capabilities for legal practice.
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? N/A

Workplace experience

7.1	Do you support the LACC retaining the requirement for a minimum of 15 days of workplace experience prior to admission? The VLSB+C is not best placed to comment in detail on the appropriate length of workplace experience required prior to admission. However, our research and the Committees' review suggest that practical experience is an important and, at times, missing element of legal training. At the very least, these considerations support retaining the current minimum.
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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? We support this in principle, but we defer to those with more relevant expertise (especially VLAB) regarding the specific skills that should be taught.
9.1	Do you support the LACC working with stakeholders to prepare guidance for supervisors on the supervision of workplace experience that addresses the purpose and requirements of workplace experience, the type of tasks to be undertaken and time allocated to them and the ethical standards and expectation of supervisors? Yes, we support this proposal. Our research (summarised in our submission and above at question 2.1) has found that supervisors of ECLs would like more guidance on the purpose and requirements of SLP. Supervisors of graduates undertaking work experience would likely also benefit from clear guidance. We note that Leo Cussen provides ‘Professional Placement Guidance’ which might be a helpful model.⁹
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? We understand the important role supervisors play in developing and supporting ECLs. We have developed guidance and resources to support supervisors to perform their role of supervising ECLs under an SLP condition,¹⁰ and would welcome further involvement in discussions on this topic. The VLSB+C does not have powers under the Uniform Law to require supervisors to undertake training, nor to accredit training courses (see more detailed discussion at question 13.2). Any measures to address this proposal, including legislative change, would need to be proportionate and mindful of the potential impact on the willingness and capacity of lawyers to act as supervisors.
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? There is value in additional training/support/resources being provided for lawyers who supervise ECLs. Our research suggests supervision can be demanding and that many supervisors face practical barriers to providing effective supervision, with the most common barrier being their own workload, followed by their supervisee’s lack of skill or knowledge. Three quarters of supervisors also told us that their supervisory responsibilities negatively affected them in some way, including by: requiring them to work longer hours to complete their own work (60%), increasing their workload

⁹ Leo Cussen Centre for Law, ‘[Professional Placement Guidelines](#)’ (Webpage, 2021).

¹⁰ Victorian Legal Services Board + Commissioner, ‘[Supervised legal practice - information for supervisors](#)’ (Webpage, 2025).

	(49%), and increasing their stress levels (31%).¹¹ We also note that supervisory and management skills are essential ingredients for an ethically engaged workplace and are positive drivers of lawyer wellbeing.¹² Training could focus on the practical aspects of good supervision, including setting expectations, giving feedback, supporting capability development, identifying and responding to wellbeing issues, and helping supervisees develop ethical judgement, interpersonal skills, prioritisation and reflective practice. To be effective, any training should be practical, proportionate and easy to access. It could be delivered through short modular training, CPD, mentoring by more experienced supervisors, and supporting resources. In developing its own resources, the VLSB+C has found value in practical tools such as supervisor guidance and a supervision plan template. The May 2026 report of the UNSW Centre for the Future of the Legal Profession suggests that supervision training should be practical, adapted to day-to-day practice and different workplace settings, introduced earlier in legal careers, and reinforced over time.¹³ The observations in this report may assist in designing training that is both useful to supervisors and workable in practice.
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? We support this proposal in principle. In terms of safeguards, there would need to be clear standards, supervision requirements and documentation to ensure the nature and level of the work undertaken is equivalent to the type of workplace experience otherwise expected under PLT. The Committees' may also want to consider a requirement around the currency of the work experience, for example, that it was completed within the second / third year of a student's legal course.
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? In principle, we support requiring PLT providers to assist students in sourcing workplace experience opportunities. We see value in PLT providers playing this role as it supports their connection to the legal profession and encourages ongoing collaboration between educators and the profession.

¹¹ Victorian Legal Services Board + Commissioner, '[Supervisors' experiences of supervising early career lawyers](#)', 2025.

¹² Holmes, V., Webb, J., Tang, S., Ainsworth, S., & Foley, T, [Lawyer Wellbeing. Workplace Experiences and Ethics. A Research Report](#) (Report, 2025) Victorian Legal Services Board + Commissioner, the Law Society of New South Wales and the Legal Practice Board of Western Australia; First Person Consulting, [Systems Theory of Change for Lawyer Wellbeing Project: Results from the System Effects Survey](#) (Report, 2024) Victorian Legal Services Board + Commissioner, Melbourne, Victoria, 20.

¹³ Centre for the Future of the Legal Profession, [Making Supervision Work for Everyone: Report of Think Tank discussions held on 23 March 2026](#) (Report, 2026) UNSW Sydney.

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? We do not yet have a settled position on the PALT proposal, but we remain open to considering it. This is a significant reform that will have impacts for ECLs, their supervisors, employers and licensing authorities. We would like to discuss this proposal further with the Committees, including the interaction between PALT, SLP and CPD. We request that all the proposals that directly impact on the regulation of lawyers, post admission be further discussed and developed in collaboration with licensing authorities. In theory, PALT could provide structure and rigour to the supervised practice period, addressing a gap our research suggests exists in SLP. To be valuable, PALT should be practically oriented and complement (rather than duplicate) workplace learning and supervision. We recommend the Committees clarify the learning outcomes PALT is intended to achieve, for example: • help graduates develop skills in specific practice area skills (to fill the gap left by cutting PLT electives); or • develop core legal skills (e.g. building towards the capabilities set out in our ECL capability framework). PALT should also avoid imposing significant burden on legal employers and supervisors, noting the risk that additional requirements could reduce employers' willingness or capacity to hire and train newly admitted lawyers (see recommendation 3 in our submission). PALT also raises significant legal and practical implications for regulators, including accreditation of PALT courses, as well as licensing and compliance considerations. We do not have legislative powers to implement many of the proposals that are being directed to us as the licensing authority. These issues are considered in detail at questions 13.2 and 15.1 below.
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. We do not have the power to implement a new PALT requirement as a condition on practising certificates. The consultation paper appears to draw on the approach in NSW, where certain requirements are managed through discretionary practising certificate conditions (for example, conditions linked to completion of a practice management course). We do not take this approach in Victoria, as it is our view (informed by legal advice) that

	discretionary conditions cannot be used to impose mandatory, cohort-wide training requirements on a class of individuals. Therefore, this proposal would require legislative change to introduce a specific statutory condition, similar to that which exists in the Uniform Law for supervised legal practice. An alternative approach could be to embed the PALT requirement as a mandatory component of supervised legal practice (SLP), supported by the necessary framework to enable consistent implementation. This would likely require amendments to the Uniform Law and/or Uniform Rules to establish the obligation and its scope, and identify who has responsibility for approving or accrediting PALT providers/content. There may be merits in building PALT into the existing supervision framework rather than creating a separate new system. For example, section 49 of the Uniform Law could be amended to require PALT as part of meeting supervision requirements. As PALT is proposed to be completed as part of SLP, this would not require the imposition of a further condition on a newly admitted lawyers' practising certificate. If this reform were enacted, it would have ramifications for regulators' approach to licensing and compliance which would require careful consideration. At this stage it is too early to provide definitive advice to the Committees on implementation approaches.
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? Barristers in Victoria do not have to undertake SLP, so PALT would not apply to ECLs who go straight to the Bar after admission in Victoria. To become a barrister in Victoria you must: • hold a Bachelor of Laws (LLB) or Juris Doctor (JD) • complete PLT to enable admission to practice • be admitted as an Australian lawyer (solicitor) and meet the eligibility requirements • pass the Entrance Examination set by the Victorian Bar to qualify for a place in the Readers' Course • satisfactorily complete the Readers' Course • work under an approved mentor at the Victorian Bar for up to 12 months, inclusive of the Readers' Course period.¹⁴ We recommend the Committees consider what impact the shorter PLT might be for barristers, as this will not be offset by doing PALT post admission.

¹⁴ Victorian Bar, '[Becoming a Barrister](#)' (Webpage, 2026).

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 do not have a settled view on this proposal at this stage. However, we raise the following matters for the Committees' consideration: • Purpose and scope: what outcomes PALT is intended to achieve (and how it differs from CPD and workplace learning during SLP). • Risk of early specialisation: whether practice-area PALT narrows development and reduces transferability where a lawyer changes roles during SLP. • Access and equity: availability for regional/rural lawyers, smaller practices and in-house roles, and what happens where an appropriate course is not available. • Licensing and completion: how completion is recognised and evidenced, including where a practitioner changes employer or practice area during SLP. The Committees should also consider whether PALT should focus on cross-cutting capabilities for early career practice (for example, the core skills reflected in our ECL Capability Framework) rather than practice-area-specific technical content that will often be developed through supervised work experience. We would welcome further discussion with the Committees and other regulators about these design and implementation issues.
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? See answer to 15.1, a practice-area model raises risks of early specialisation and the Committees may wish to consider other options, e.g. a greater focus on core legal capabilities.
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 are currently some supervision-related limitations on ECLs practising under an SLP condition. In particular, rule 7 of the Legal Profession Uniform General Rules sets out what is meant by supervised legal practice and the supervisor's role in directing, overseeing and reviewing the work of the supervised lawyer. Further, the VLSB+C guidance states that the supervisor must have 'authority in respect of work performed' and be able to 'direct, amend, override or intervene'.¹⁵ We do not have a settled view on whether further restrictions should apply for the purposes of PALT. We would need to understand the capabilities to be developed through PALT (as opposed to the previous stages of legal education) and

¹⁵ Victorian Legal Services Board + Commissioner, ['Supervised legal practice - information for supervisors'](#) (Webpage, 2025).

	potentially undertake further research and consultation. Any additional restrictions would need to be clearly defined, proportionate and workable, and consider potential impacts on employability of newly admitted lawyers and the willingness and capacity of employers and supervisors to hire and support them. They would also likely require legislative reform.
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? This will depend on what learning outcomes and capabilities we are expecting to be developed from PALT. We heard through our 2024 survey of supervisors of ECLs undertaking SLP that there are concerns about the impact of online education on ECLs' communication skills and their ability to form professional networks with peers and mentors. However, synchronous and interactive online delivery can also be suitable to support learning and can improve access for people who live regionally, have caring responsibilities, or have work or other commitments. We recommend the Committees consider the benefits and risks of different delivery modes, and consult further with legal employers about the practical implications and cost burden of in-person requirements for newly admitted lawyers (including alongside existing CPD obligations). We would also encourage the exploration of other mechanisms that encourage a connected and learning-focused profession, such as networks and mentoring. While developing our Lawyer Wellbeing Systems Theory of Change we consulted with Victorian lawyers and heard their vision for the future of the profession, where 'personal and professional growth through meaningful mentorship, development, and balance is encouraged and supported'.¹⁶ We encourage the Committees to consider how the legal education framework can support this vision.
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? We do not have a concluded view on this proposal. We are the licensing authority for solicitors in Victoria and we do not have powers under the Uniform Law to perform these functions. Implementing this proposal would require legislative reform, a new accreditation/approval framework, and additional regulatory resourcing.

¹⁶ Victorian Legal Services Board + Commissioner, '[Lawyer Wellbeing Systems Theory of Change: Key outcomes needed across all levels of the legal sector to drive systemic change in lawyer wellbeing](#)', 2025.

	The independent 2020 review of CPD in Victoria commissioned by the VLSB+C did not recommend regulator accreditation of CPD providers, citing concerns about box-ticking and increased costs for lawyers.¹⁷ In our view, similar considerations may arise here. If regulator approval of PALT content and providers is to be introduced, it should be supported by a clear rationale, evidence that it would improve quality, and a workable resourcing model.
19.1	Do you support the proposal that PALT should incorporate rigorous assessment? Do you have any views on the parameters for this requirement? In principle, some form of assessment seems appropriate to support learning. However, this will need to be informed by adult learning principles and contemporary pedagogical approaches, and balanced with other considerations including the significant time pressures on this cohort, and the need to support their wellbeing. It also depends on who will conduct the assessments. We know that supervisors are already overburdened and experiencing stress due to their supervisory obligations,¹⁸ so assessment responsibilities are probably not best placed on supervisors. There may also be licensing implications if PALT includes an assessment component. For example, regulators would need clarity about whether completing the required hours without passing the assessments would be sufficient for removal of the SLP condition. Further consultation with legal education experts would be helpful to consider what types of assessments would be most effective to solidify learning from PALT. There is merit in requiring PALT participants to engage in reflective practice, as a method of embedding and assessing skills and knowledge learned through PALT. As noted above, there is evidence that reflective practice can be an effective method to support professional development.¹⁹ However, the use of reflective learning techniques in professional practice is not a common feature of legal practice, unlike many other professions.²⁰ Reflective practice would not only help embed and assess skill development, but also has the benefit of not being hugely onerous on supervisors.

¹⁷ Chris Humphreys, [Review of Continuing Professional Development for Victorian Lawyers](#) (Report, 2020) Victorian Legal Services Board + Commissioner, 50.

¹⁸ Victorian Legal Services Board + Commissioner, [Supervisors' experiences of supervising early career lawyers: 2024 survey](#), 2024.

¹⁹ See, for example: Michelle Leering, 'Conceptualizing Reflective Practice for Legal Professionals' (2014) 23 *Journal of Law and Social Policy* 83-106; Judith McNamara, Rachael Field, & Catherine Brown, 'Learning to reflect in the first year of legal education: the key to surviving legal education and legal practice' (2009). In Thomas, J (Ed.) *First Year in Higher Education Conference*. QUT Publications, Australia, 1-10.

²⁰ Chris Humphreys, [Review of Continuing Professional Development for Victorian Lawyers](#) (Report, 2020) Victorian Legal Services Board + Commissioner, 37.

Clinical legal education	
20.1	Do you support the Committees considering options for the inclusion of clinical legal education as a component of PLT? We welcome the Committees' consideration of approaches that could have positive consequences for access to justice, as well as positive impacts on lawyers' engagement and professional identity, and help develop client skills. We support consideration of clinical legal education as a component of PLT, provided its purpose is clearly defined, overlap with existing practical training is avoided, and any impacts on accessibility and diversity are considered.
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 We do not have a concluded view on whether clinical legal education should be mandatory or optional within PLT. If mandatory, it seems appropriate that credit should be available where equivalent learning has already occurred, to avoid duplication, cost and burden for students.
20.3	If clinical legal education is optional, should completion of clinical legal education satisfy the requirements for PALT? The VLSB+C cannot form a view at this stage, particularly as the content of PALT is not yet settled.
20.4	Who should be responsible for delivering and supervising clinical legal education? The VLSB+C does not have a view on this question and does not presently have powers under the Uniform Law to take on this role.
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? Yes.

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 support the development of guidance, and our research suggests this is needed. This is why we developed the Early Career Lawyer Capability Framework, Supervision Plan Template and Reflective Practice Template: to support ECLs undertaking SLP and their supervisors. The VLSB+C's surveys of supervisees in 2023 and supervisors in 2024 found significant inconsistencies in the quality of SLP experiences. One third of supervisees reported inadequate supervision (i.e. no regular supervision, not learning the necessary skills). The research also identified critical issues affecting the effectiveness of SLP, including: • Lack of clarity about the purpose and objectives of SLP²¹ • Limited guidance on the core skills ECLs should develop during the SLP period • Inconsistent supervision quality (about one third of supervisees reported limited access to supervisors, infrequent feedback, or little support for skills development or wellbeing) • Supervisor constraints: ○ Supervisors face significant time pressures; more than half reported increased workload impacts, while one third reported high stress ○ Fewer than half of supervisors have received training in how to supervise ○ Many workplaces lack practical resources to support supervision.²² Additional guidance would help address capability gaps in supervision and support the wellbeing of both supervisors and supervisees. This is particularly important given evidence of high stress and burnout among senior lawyers, suggesting that practical guidance may also help reduce the burden of supervision. We note that if supervision is reformed to include more structured requirements, this will raise questions about how regulators enforce these requirements and the extent to which failing to uphold these additional supervisory obligations could become a disciplinary matter.

²¹ 42% of supervised lawyers wanted a better understanding of what they should be doing or learning during SLP: Victorian Legal Services Board + Commissioner, [Early career lawyers' experiences of supervised legal practice: 2023 survey](#), 2023.

²² Victorian Legal Services Board + Commissioner, [Supervisors' experiences of supervising early career lawyers: 2024 survey](#), 2024.

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? We support this proposal. We are interested to learn from other jurisdictions and share insights from our regulatory approach. We are happy to share our ECL resources with other regulators and support these resources being used or adapted in other Australian jurisdictions. As we submitted in our response to the NSW Legal Profession Admission Board Discussion Paper on PLT Reform, we do not support adding formal supervision requirement such as mandatory supervision reports, structured training plans or performance assessments.²³ These measures could impose significant additional burden on supervisors where supervisor capacity is already constrained, and may discourage lawyers from taking on the role. They could also create new regulatory and resourcing demands for legal regulators, potentially requiring legislative reform.
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Implementation timing	
22.1	Do you support the proposed transitional arrangements and implementation timeframe set out at Proposal 22? As outlined in our submission, we welcome the review and the opportunity to contribute to ongoing discussions. However, the reforms are complex, likely to require legislative and regulatory change, and will involve significant implementation work across multiple stakeholders. In that context, the proposed timeframe appears ambitious and a more staged, iterative approach is preferable. We strongly advocate for active involvement in the development of all reforms that affect post admission legal education and training, in particular PALT and any reforms to SLP and CPD. In addition, the VLSB+C's capacity to implement reforms are likely to be affected by plans to merge VLAB and associated organisational and legislative work (a recommendation arising from the Victorian Government Independent Review of the Public Service). We also note that there will be Victorian State elections in 2026, with government moving into caretaker mode, which may also impact timelines for legislative reforms.

²³ Legal Profession Admission Board of New South Wales, [Discussion Paper on PLT Reform](#) (Discussion paper, 2025) 104.