

SUBMISSION TO THE LAW ADMISSIONS CONSULTATIVE COMMITTEE

CONSULTATION ON PRACTICAL LEGAL TRAINING REFORM

1 EXECUTIVE SUMMARY

The Regional Alliance of Justice Associations (RAJA) makes this submission to the Law Admissions Consultative Committee (LACC) as a coalition of Community Legal Centres operating across regional, rural and remote Western Australia. RAJA's contribution to this consultation rests on a structured workforce reform research and design program undertaken across 2024–2026 in partnership with Western Australian admitting and regulatory authorities, the four WA law schools, accredited PLT providers, Aboriginal Community Controlled Organisations and the senior cross-system bodies.

The findings establish the central proposition of this submission. The regional legal workforce supply problem in Western Australia is structural, and the conditions producing it have been compounding for at least two decades. Successive workforce interventions have failed because they operated at service level without integration with the system-level enablers, housing, childcare, digital, supervision and admission framework, required to scale or sustain them. The Australian legal sector already has a working comparator for graduate workforce supply in regional Australia: the Legal Aid Commission graduate program, with its funded PLT, structured rotations, intensive supervision, guaranteed two-year employment and clear development pathway. The Community Legal Centre sector lacks the structural conditions to replicate it, despite higher case complexity, higher demand and far greater isolation. PLT reform will not resolve this on its own, but its design either enables the alternative pipeline structures that would allow the CLC sector to construct an equivalent, or it forecloses them. The current reform draft forecloses them.

RAJA endorses the Consultation Paper's implicit recognition that the existing PLT framework is structurally over-specified and not fit for purpose. RAJA also accepts the pedagogical premises that appear to inform the proposed direction: that face-to-face delivery has formative value, that the building of professional fraternity during the early-career period is a legitimate design objective, and that post-experience reflective synthesis has pedagogical merit. RAJA submits that the Consultation Paper, in operationalising them, relies on an unstated assumption: that face-to-face delivery occurs in a capital city, and that the professional fraternity being built is fraternity with the metropolitan legal profession. Once that assumption is made explicit, the same pedagogical reasoning supports regional delivery and regional fraternity equally well. For graduates whose careers will be in regional Western Australia, that is the relevant fraternity. RAJA invites the Committee to surface the metropolitan-default assumption and reconsider it.

This submission establishes the regional legal workforce crisis through external evidence (Section 2), critiques the proposed reform direction against the findings of RAJA's workforce reform program (Section 4), sets out five recommendations to the Committee on the PLT framework (Section 5), and describes the architecture RAJA proposes to deliver if those recommendations are adopted (Section 6).

RAJA's lead position is Recommendation 1: the reform framework must retain flexibility for accredited providers and host services to design alternative graduate pipeline structures for regional, ACCO-led and community legal practice. The remaining four recommendations enable that flexibility.

2 THE REGIONAL LEGAL WORKFORCE CRISIS

The Australian legal assistance sector is in a sustained workforce crisis, and the regional dimension is acute. The Commonwealth Attorney-General's Department has acknowledged this directly through the National Access to Justice Partnership (NAJP), in which Workforce constitutes one of the named priority pillars and

through which Commonwealth and State governments have committed to addressing supply-side challenges in the sector. The Independent Review of the National Legal Assistance Partnership (Mundy, 2023–24) documented workforce supply as a strategic risk to the sector’s ability to discharge its statutory and funded obligations, with regional acuity called out specifically. The Productivity Commission’s Access to Justice Arrangements Report (2014) earlier established the unmet legal need profile of regional Australia and the scale of the supply gap. The Australian Universities Accord Final Report (February 2024) acknowledged structural placement-poverty issues across professional training pipelines and called for coordinated funding settlements modelled on existing rural health arrangements.

The regional Western Australian dimension is the sharpest case in the country. RAJA member services serve population catchments across more than 2.5 million square kilometres, in which Aboriginal legal need profiles, family violence prevalence, child protection demand, criminal justice contact rates and unmet civil law need are concentrated at levels significantly above national averages. Member service vacancy rates, time-to-fill metrics and senior practitioner attrition are at levels that, if reproduced in the rural medical workforce, would attract national emergency intervention. They have not, to date, attracted the equivalent in the legal sector. Practical Legal Training reform is one of several structural levers required to address this. RAJA welcomes the consultation as the opportunity to ensure that whatever framework emerges does not foreclose the regional response.

3 ABOUT THE REGIONAL ALLIANCE OF JUSTICE ASSOCIATIONS

3.1 Mandate and Operational Footprint

The Regional Alliance of Justice Associations is a coalition of Community Legal Centres operating across regional, rural and remote Western Australia. Member services collectively cover an operational footprint exceeding 2.5 million square kilometres, approximately one-third of the Australian continent and an area larger than Western Europe, serving population catchments that include some of the most acute legal need profiles in the country. RAJA was formed because the workforce challenges facing community legal practice in those member regions cannot be addressed by individual centres acting alone. The Alliance exists to design and operate the regional workforce architecture that the historic admission, training and funding settlements have not produced.

3.2 Stakeholder Validation and Trust Networks

RAJA’s research and design positions have been progressively validated through structured engagement with the Western Australian institutions whose participation will determine whether national reform translates into regional outcomes. These include the Legal Practice Board of Western Australia (the State’s admitting and regulatory authority), the Law Society of Western Australia, the Department of Justice (Western Australia), Legal Aid Western Australia, the Department of Housing and Works, the Western Australian regional development commissions, and Aboriginal Community Controlled Organisations across the Kimberley, Pilbara, Mid-West, Goldfields and Wheatbelt. The University of Western Australia, Curtin University, the University of Notre Dame Australia and Murdoch University have been engaged on the supply-pipeline dimension. RAJA’s positioning is consistent with sector positions advanced through Community Legal Centres Australia, Community Legal WA, the National 4Rs Community Legal Network, and the Law Council of Australia’s engagement on rural, regional and remote legal services. The recommendations in this submission rest on that validated base.

3.3 The RAJA Workforce Reform Program

Across 2024–2026 RAJA delivered an integrated workforce reform research and design program for the Western Australian community legal sector. The program comprised primary survey research, Aboriginal-led research grounded in the Kimberley, cross-sector benchmarking, system leadership engagement, governance

interrogation and the design of three integrated workforce architecture components. The program produced a series of findings that bear directly on PLT reform.

The methodology underpinning the findings that follow was deliberately interdisciplinary. The legal sector has not, to RAJA's knowledge, conducted workforce research equivalent to what the Australian Medical Association and the rural health colleges have produced over the past two decades. RAJA's program is the first integrated, system-level evidence base for regional legal workforce supply in Australia, and provides the analytical foundation for the recommendations and ambitions set out in this submission.

The regional legal workforce is in structural crisis, and successive interventions have failed because they operated at service level without system-level enablers. The regional legal workforce supply problem in Western Australia is structural, and the conditions producing it have been compounding for at least two decades. Each successive workforce intervention, from the Country Lawyers Placement Program through subsequent graduate schemes, has delivered service-level value at the time of operation but failed to produce lasting change. The consistent failure pattern is service-level effort without integration with the housing, childcare, digital, supervision and admission infrastructure required to scale or sustain it. These cross-sector enablers sit outside the legal sector entirely: housing inequity (38 per cent of practitioner survey respondents named housing the single biggest incentive needed), regional childcare deserts, digital connectivity constraints that limit blended delivery models, and primary and secondary education access for practitioners' families relocating into regional centres. They determined the success or failure of every prior workforce intervention and they will be determinative of the outcome of both this reform and RAJA's work across this system in the future.

The demand for regional practice exists but the admission and training framework does not convert it into placement. Sixty-five per cent of Western Australian law students surveyed expressed some level of interest in regional, rural or remote practice, with only 33 per cent having any prior regional background, the interest signal is materially broader than home connections. Yet 97 per cent of respondents were unaware of any regional practice incentive, 90 per cent reported their law school had not provided information about regional opportunities, and 83 per cent reported their university does not offer regional legal placement opportunities. Among practitioners currently in regional practice, 79 per cent secured employment before relocating, through deliberate planned pathways constructed by individual practitioners against the structural grain. The admission and training framework provides no structural mechanism to convert documented student interest into regional placement.

The admission framework actively reduces the regional pipeline. The framework, in its current design, filters regional practitioners out of the pipeline at two sequential stages of admission. At the law degree stage, university pathways are metro-centric with little structured visibility into regional community legal practice; career expectations form around what students see and do, and what they see and do is metropolitan. At the PLT stage, the current framework is expensive, logistically inaccessible and disconnected from community legal practice, three structural failures that compound the metropolitan trajectory consolidated at the previous stage. The cumulative effect is a pipeline filter, not a pipeline. The bottom-line finding is direct: a sustainable regional legal workforce cannot be built without in-region training access. This is not a preference; it is a structural condition.

A working comparator exists in the Australian legal sector.. Legal Aid graduate programs are a model for graduate workforce supply that successfully attracts and retains early-career practitioners in regional and rural Australia. Its configuration is neither exotic nor untested - funded PLT, structured rotations across practice areas, intensive supervision, guaranteed two-year employment, and a clear professional development pathway. The Community Legal Centre sector has none of this, despite facing higher case complexity, higher demand and far greater geographic isolation than either Legal Aid commissions or private firms. The structural inequity is not accidental; it follows from a funding settlement, an admission framework and an absence of orchestrating mechanism that together prevent the CLC sector from offering an equivalent.

Mandatory metropolitan delivery is structurally exclusionary for Aboriginal candidates with Country and kinship obligations. Aboriginal-led research undertaken with Marninwarntikura Women’s Resource Centre (MWRC) in the Kimberley produced a finding stated precisely in the source: mandatory metropolitan delivery of admission requirements (including PLT) is, for Aboriginal candidates with Country and kinship obligations, an “impossible proposition.” Relocation away from Country, separation from children and extended family, and the absence of culturally anchored supervision combine to make the existing pathway structurally inaccessible regardless of candidate aptitude or interest. The bottom-line finding from the Aboriginal-led research is direct: a sustainable Aboriginal legal workforce cannot be built without in-region training access. RAJA notes, consistent with MWRC’s framing, that these findings are specific to the Kimberley and should not be generalised; statewide Aboriginal-led research remains a critical next step.

4 THE REFORM DIRECTION: RAJA’S CRITIQUE

RAJA endorses the Consultation Paper’s implicit recognition that the 2002 LACC PLT Competency Standards (with their 146 individual learning outcomes) are structurally over-specified and not fit for purpose. The reform direction also addresses a real and legitimate problem for one significant employer cohort: large government and corporate graduate-program employers, for whom a compressed front-end PLT followed by a back-end capstone post-admission training block is a fit-for-purpose configuration. RAJA does not contest that this configuration serves that cohort.

RAJA accepts, equally, the pedagogical premise that appear to inform the proposed direction: that face-to-face delivery has formative value in graduate development, that the building of professional fraternity during the early-career period is a legitimate design objective, and that post-experience reflective synthesis has pedagogical merit. The NSW Legal Profession Admission Board PLT Discussion Paper articulates a thoughtful pedagogical case for these design considerations. RAJA endorses that case.

What RAJA submits is that those pedagogical premises, properly applied to regional, rural and remote community legal practice, do not produce the framework currently proposed. They produce a different framework. For graduates entering or remaining in community legal practice in regional Western Australia, professional fraternity is not meaningfully built with commercial practitioners in Perth or Sydney. It is built with practising lawyers in Broome, Geraldton, Bunbury, Kalgoorlie, Karratha and Albany. It is built with Aboriginal Legal Service practitioners in the Kimberley, with Legal Aid solicitors in the Pilbara, with sole practitioners in regional towns. The pedagogical case for face-to-face delivery is, in this practice context, an argument for regional cohort delivery rather than against it. The Consultation Paper’s pedagogical premises support the regional cohort-pipeline structures RAJA’s research has designed, on the precondition that “face-to-face” is not silently equated with “metropolitan.” RAJA invites the Committee to surface that conflation and reconsider it.

Our view is that the framework, as drafted, retains the metropolitan default at every stage of admission and, on the available evidence, will reproduce the failure pattern of every prior workforce intervention. A reform that addresses pedagogical and assessment design without engaging the housing, childcare, digital, supervision and admission infrastructure on which sustained regional supply depends does not solve the regional supply problem; it concedes it. The reform framework does not need to fund or deliver those enablers; it needs to permit the architecture that coordinates across them. As drafted, it does not, and in foreclosing the alternative pipeline structures that would allow the Community Legal Centre sector to construct a Legal-Aid-equivalent graduate pipeline, it creates or strengthens structural barriers to resolving the regional workforce challenge.

The RAJA Workforce Reform Project findings establish the evidence base for RAJA’s critique of the framework as drafted. On the framework as drafted, three specific structural concerns warrant the Committee’s attention. First, a four-week PLT delivered through metropolitan providers operates, in practice, as a relocation requirement. For Aboriginal candidates with Country and kinship obligations, and for many other candidates with caregiving responsibilities or financial constraints, this is structurally exclusionary, and the consequence is the loss of precisely the cohorts our regional services depend upon. Second, mandatory in-

person Post-Admission Legal Training (PALT) layered on top of CPD requirements transfers structural costs onto early-career lawyers practising in regional Western Australia, with no proposed funding line. Third, compression of PLT below the FEE-HELP volume-of-learning threshold removes income-contingent loan support entirely, transferring further cost onto Aboriginal, mature-age, lower-income and regionally-based candidates; the same cohorts our sector depends upon for sustainable workforce supply.

RAJA's critique of the proposed direction can be stated precisely: there is too much required structure without available evidence. The Consultation Paper's prescriptions are designed to protect against abuses experienced under the existing PLT framework, and those protections are appropriate and warranted. The framework as drafted, however, goes beyond protection into prescription, and is prescriptive enough to prevent solving the regional legal workforce supply problems documented in the findings. The protections and the flexibility this submission asks for are not in tension with one another. Both can be designed into the reform framework.

We note that broadly, RAJA's position is consistent with concerns articulated by the NSW Law Deans (March 2026), Leo Cussen Centre for Law and the Australasian Professional Legal Education Council (APLEC) in response to the parallel NSW Legal Profession Admission Board process. The NSW Law Deans have characterised the proposed metropolitan face-to-face block as "an admission tax that falls exclusively on students from outside major metropolitan centres," and have observed that "mandate without funding is not reform; it is a cost transfer." RAJA endorses those characterisations. RAJA additionally invites the Committee to commission a comparative analysis of the saturation of lawyers in regional Australia under the previous articles system as compared with the current PLT system. The centralisation effect of the existing admission framework on regional legal workforce supply is a question the reform process should engage with before further centralising prescriptions are introduced.

The recommendations that follow set out the framework conditions required to enable a regional response, while preserving the protections the Committee has rightly built into the reform direction.

5 RECOMMENDATIONS TO THE LAW ADMISSIONS CONSULTATIVE COMMITTEE

The recommendations below are scoped to what the Committee can deliver through changes to the PLT framework itself, and are organised by the kind of action each requires. Recommendations One and Two ask the Committee to ensure the reform framework does not foreclose pipeline structures the existing PLT framework permits or the regional sector requires. The remainder ask the Committee to consider structural options the framework can recognise to support regional, ACCO-led and community legal practice.

Each recommendation cross-references the findings it responds to. Implementation commitments conditional on these reforms being adopted are set out in the following section.

5.1 Recommendation 1: Retain inherent flexibility for alternative graduate pipeline structures, including integrated PLT and post-admission delivery

Recommendation: The framework expressly permits accredited providers and host services, individually or collectively, to design and deliver alternative graduate pipeline structures that achieve the same fundamental legal and professional ethical competencies through different delivery configurations. Permitted configurations to include integrated PLT and post-admission training delivered as a coherent two-to-three year graduate pipeline, with assessment milestones distributed across the pipeline and the capstone end-block requirement modified or omitted where the pipeline structure provides equivalent oversight. Approval criteria for alternative structures to be specified within the framework rather than left to discretion or exception.

Rationale: This is the lead position of the submission. The reform as drafted envisages a single pipeline structure: compressed front-end PLT, two years of on-the-job experience, and a capstone post-admission block. That structure serves large government and corporate graduate-program employers but forecloses the cohort-based pipeline structures required for regional legal workforce supply. The existing PLT framework, for all its over-specification, permitted elective design for different practice contexts; the new framework

removes that flexibility entirely. The capstone end-block, applied to two years of professional supervision that has had no structured oversight under the existing framework, functions as a compensatory mechanism for the absence of structured PLT supervision; where graduates progress through a structured cohort pipeline, that compensatory function is unnecessary and the competencies the capstone would consolidate are more coherently distributed across the pipeline. Cross-sector evidence from medicine (the RACGP fellowship pathway) and psychology (the registrar pathway) supports this design. The protections the Committee proposes against past abuses are not in tension with this flexibility; both can be designed into the reform.

Responds to Findings 1, 3 and 4.

5.2 Recommendation 2: Withdraw mandatory in-person Post-Admission Legal Training in current form

Recommendation: The proposed mandatory in-person Post-Admission Legal Training be withdrawn in its current form. Post-admission competencies be delivered through the integrated graduate pipeline structures permitted under Recommendation 1.

Rationale: Mandatory in-person PALT, layered on top of CPD, imposes annual travel, accommodation, course fee and lost-service-delivery costs on early-career lawyers in RAJA member regions. Worked-example return costings from Broome, Karratha or Kalgoorlie to Perth demonstrate that the proposal in its current form operates as a regressive impost on practising in our regions, and RAJA member services will provide such costings on request. The substantive content of post-admission training is not at issue; the structural mandate of in-person delivery, layered on top of unfunded travel, is.

Responds to Finding 3.

5.3 Recommendation 3: Recognise place-based, in-region PLT delivery as a standard option, including PLT-as-capstone within accredited law degrees

Recommendation: The framework expressly recognise accredited PLT delivery in regional centres, including Albany, Broome, Geraldton, Bunbury, Kalgoorlie and Karratha, as a standard structural option rather than an exception requiring special approval, with admitting authorities to apply equivalent fee, funding and supervision arrangements to regional and metropolitan delivery. The framework also expressly permit PLT to be delivered as a capstone unit within an accredited, FEE-HELP-eligible law degree, on a permissive (not mandatory) basis. Where regional in-person delivery is supplemented by virtual delivery components, virtual delivery to be permitted on the condition that it is augmented by structured practical experience, supervised placement, and the broader cohort-based pipeline structure set out in Recommendation 1.

Rationale: Mandatory metropolitan delivery operates as a structural exclusion mechanism for Aboriginal candidates with Country and kinship obligations and as a relocation requirement for the broader cohorts the sector depends upon. The proposed compression of PLT to four weeks, particularly if structured as two non-consecutive blocks, makes regional delivery materially more feasible than under the existing six-month model. Embedding PLT as a capstone unit within an accredited law degree preserves FEE-HELP eligibility without requiring Commonwealth legislative change; this pathway is in active design with Curtin Law School and is the most operationally tractable mechanism to preserve income-contingent loan eligibility within the reform framework. Virtual delivery in isolation has serious limitations; virtual delivery as a component of a coherent, structured, supervised cohort pipeline is materially different from virtual delivery as a stand-alone substitute, and the framework should distinguish between the two.

Responds to Findings 2, 3 and 5.

5.4 Recommendation 4: Recognise Community Legal Centres and Aboriginal Community Controlled Organisations as accredited PLT delivery sites

Recommendation: The framework formally recognise Community Legal Centres and Aboriginal Community Controlled Organisations as accredited PLT delivery sites, supported by hub-style coordination infrastructure and shared supervision arrangements that meet regulatory requirements. Where Aboriginal-led services are involved, this be conditional on explicit cultural governance and Aboriginal-led design conditions, consistent with Closing the Gap Priority Reform Two and the Western Australian Aboriginal Empowerment Strategy.

Rationale: The Legal Practice Board of Western Australia has confirmed that pooled supervision arrangements, in which the supervising practitioner is engaged by an orchestrating entity (such as RAJA) and assigned as an associate to the host CLC for the purpose of legal practice, are achievable within the existing regulatory framework. The technical pathway is established. This recommendation is the structural enabler for the alternative pipeline configurations sought in Recommendation 1.

Responds to Findings 4 and 5.

5.5 Recommendation 5: Embed substantive First Nations legal education across all admission stages

Recommendation: The framework expressly require substantive First Nations legal education across the law degree, PLT and post-admission training, regardless of intended practice area. Substantive First Nations legal education means recognition of the many legal systems operating in this country: Aboriginal legal systems that long predated the inherited Anglo-Australian legal system, continue to operate across the continent in parallel to it, and that Aboriginal people navigate alongside it. In addition, it means recognising and educating all lawyers on the '[systemic discrimination that permeates the Australian legal system with respect to First Nations peoples](#)'. This was acknowledged by the Council of Australian Law Deans in 2020. This recognition needs to be translated into education and training in both the law school and PLT and post-admission training contexts. Every lawyer admitted in Australia should hold this recognition and, at some level, understand both the systemic discrimination in the Anglo-Australian legal system and how the parallel legal systems intersect within their practice, as well as the broader legal context.

Rationale: RAJA is not Aboriginal-led, and the substantive design of First Nations legal education must be led by Indigenous legal academics and Aboriginal-led services; RAJA's role on this recommendation is amplifier, not primary voice. Through workforce reform research grounded in the Kimberley, RAJA has been intrinsically aware of the critical need to ensure an Aboriginal lens through all aspects of the legal system and legal education, not only those that explicitly serve Aboriginal clients. A practitioner working in property law, mergers and acquisitions or commercial litigation operates within a legal landscape constructed by the displacement of a prior legal order; treating that recognition as relevant only when working with Aboriginal clients is a category error in legal education. RAJA endorses, in advance, the contributions to this consultation by the national Indigenous Cultural Competencies in Law project, and notes the substantive scholarship in Legal Education Through an Indigenous Lens: Decolonising the Law School (Watson and Douglas eds., 2025), particularly the chapter by Porter and Cubillo on the four characteristic failures of Australian clinical legal education.

Responds to Finding 5.

5.6 Beyond the Committee's direct levers: matters on which RAJA invites the Committee's voice

The matters below lie beyond what the Committee can deliver through the PLT framework. RAJA does not ask the Committee to deliver them; RAJA invites the Committee to acknowledge them in its advice to admitting

authorities and the Council of Chief Justices, so that the framework reform is correctly positioned as a necessary but not sufficient component of the regional workforce response.

The system-level enablers position. PLT reform alone will not produce sustainable regional legal workforce supply. The system-level drivers identified in the findings, housing inequity, regional childcare deserts, digital connectivity constraints, and education access for practitioners' families, are outside the legal sector entirely, and outside the Committee's remit. RAJA invites the Committee to surface, in its advice, that the reform framework is a precondition for a regional workforce response but cannot produce one without coordinated cross-portfolio engagement on these enablers.

The placement-poverty parallel. The Australian Universities Accord (February 2024) recognised structural placement poverty across professional training pipelines and called for coordinated funding settlements modelled on existing rural health arrangements. Legal training has no equivalent of the Commonwealth funding for nursing, midwifery and allied health placements through the Australian Rural Health Education Network. RAJA invites the Committee to endorse, in its advice, the case for a regional, rural and remote legal training placement funding settlement on the rural health model.

6 SECTOR ARCHITECTURE CONDITIONAL ON FRAMEWORK REFORM

The recommendations above are tightly scoped to the reforms within the gift of the Law Admissions Consultative Committee. The architecture below describes what RAJA and its member services are positioned to deliver, and what RAJA calls on Commonwealth and State authorities to fund, conditional on those framework recommendations being adopted. It is designed from the outset to coordinate across the system-level enablers (housing, childcare, digital infrastructure, and education access for practitioners' families) that determined the success or failure of every prior workforce intervention. The logic is conditional. If the Committee delivers the framework changes, RAJA is positioned to operationalise the regional architecture. If it does not, the architecture cannot operate, and the regional workforce supply problem the Consultation Paper does not engage with will continue to compound.

A regional cohort graduate pipeline through the RAJA Regional Workforce Hub. Hosted across member services in Broome, Geraldton, Bunbury, Kalgoorlie, Karratha and Albany, the Hub is designed to provide coordinated PLT and post-admission training to a cohort of graduates entering regional community legal practice, with shared supervision arrangements validated by the Legal Practice Board of Western Australia. RAJA is positioned to operationalise this architecture conditional on Recommendations 1, 3 and 4 being adopted.

Regional PLT delivery and pre-admission pipeline partnerships with WA law schools. Active design work is in progress with the Dean of Curtin Law School to develop FEE-HELP-eligible regional PLT delivery models. The work proceeds conditional on the framework permitting PLT-as-capstone-unit configurations under Recommendation 3. RAJA's Education Partnerships framework extends this engagement to the pre-admission period, addressing the structural pipeline invisibility documented in the second finding, including regional placement options during the law degree, structured promotion of regional legal practice through career education at all four WA law schools, and integration with the Country Practitioners Committee of the Law Society of WA on coordinated student outreach.

Aboriginal-led design and delivery in ACCO contexts. Where Aboriginal Community Controlled Organisations elect to host PLT delivery, design and governance will be Aboriginal-led, in accordance with Closing the Gap Priority Reform Two and the WA Aboriginal Empowerment Strategy. RAJA's role is logistical and operational; substantive design rests with the ACCOs.

A funded regional graduate pathway. RAJA calls on Commonwealth and State authorities to fund a regional, rural and remote graduate access pathway covering travel, accommodation and living costs for students relocating into regional services for placement, PLT or graduate roles, comparable in design intent to existing Commonwealth funding for nursing, midwifery and allied health placements through the Australian Rural

Health Education Network. The Australian Universities Accord (February 2024) recognised placement poverty in rural health training; legal training has no equivalent. RAJA submits its operational architecture as a delivery vehicle once funding is in place.

Resourcing of the orchestrating infrastructure. RAJA's Regional Workforce Hub model is designed to operate as a coordinated, funded entity sitting alongside member services. Without resourcing of the orchestrating infrastructure, the architecture cannot scale to the magnitude of the regional workforce supply problem the National Access to Justice Partnership Workforce Pillar acknowledges.

Cross-system coordination of workforce enablers. The Hub's design includes formal coordination mechanisms with State housing authorities, regional childcare providers, regional development commissions, digital connectivity programs and education access pathways for practitioners' families relocating into regional centres. These are the cross-system enablers identified in the first finding and that no individual CLC has the mandate, scale or relationships to coordinate alone. RAJA calls on the Commonwealth and Western Australian Governments to formalise cross-portfolio coordination of these workforce enablers as a precondition for sustainable regional legal workforce supply.

7 CONCLUSION

The opportunity in this consultation is larger than the Consultation Paper recognises. PLT reform alone will not solve the regional legal workforce crisis. The system-level drivers documented in the findings are not within the remit of the Law Admissions Consultative Committee to address. PLT reform, designed with the inherent flexibility this submission asks the Committee to retain, is nevertheless the precondition for the architecture that can. The Australian rural health workforce sector built its equivalent pipeline over twenty years through sustained Commonwealth investment, coordinated cross-portfolio engagement on housing, childcare, digital and education enablers, and evidence-based design through bodies including the Australian Medical Association, the Royal Australian College of General Practitioners, and the Australian Rural Health Education Network. The legal workforce sector has not built the equivalent. This reform moment is the opportunity to begin, and RAJA welcomes further engagement with the Law Admissions Consultative Committee and the Legal Services Council Admissions Committee on any element of this submission.

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