

18 August 2025

TEQSA and others in the matter of their regulation of legal education

This submission is intended to place before the Senate Education and Employment Legislation Committee's inquiry into governance at Australian higher education providers, information in the public domain which when taken together suggests an incongruence between the stated objectives of TEQSA and the NSW Legal Profession Admission Board in ensuring the quality of governance at Australian higher education providers, and in particular, the providers of legal education. It is submitted that this incongruence will, if it has not already, erode confidence here and overseas in the competence of Australian trained lawyers. This submission comprises two parts, under the rubrics "College Of Law Australia" and "Top Education Group (trading since 2019 as the Australian National Institute of Management and Commerce)".

College Of Law

[On 6 February 2025 the Chief Justice of the Supreme Court New South Wales Mr Andrew Bell SC AC, said at \[45\] in a speech to mark the opening of the 2025 legal term :](#)

The [the NSW Legal Profession Admission Board (LPAB)] with my support, has engaged Urbis, a well-respected independent research agency, to undertake a survey of the profession's views about PLT (the mandatory Professional Legal Training required to be admitted to practise). This survey has been developed with input from the Law Society, the Bar, the Legal Services Council, the LPAB, the Law Admissions Consultative Committee which includes a representative of the national body representing PLT providers.

In the prior paragraph [44] Bell identified and named the College Of Law Australia Pty Ltd (the College) as his primary source of concern for the College is the largest provider of PLT in NSW and the country.

[Then, on 14 April 2025 Mr Bell released the results of the survey and in doing so noted:](#)

- PLT is seen as a box ticking exercise, lacking deep relevance to legal practice;
- the move to most of the course being delivered online has led to a lack of in-depth learning;
- a lack of academic rigour was reported with the course being seen as hard to fail;

The public , especially consumers of legal services, have yet to be informed how Bell and his predecessors, including [Tom Bathurst](#), being chairmen of the NSW LPAB which is responsible for the oversight of the legal profession including training, accredited and re-accredited [The College of Law Australia](#) as a PLT provider for over two decades despite all the deficiencies that Bell himself has enumerated ,which go the core of the PLT. .

Reporting in the [Australian Financial Review](#) , and [Lawyers' Weekly, suggests that these problems are not new, and go back to at least 2005.](#) Despite the public airing in media and now by Bell himself, the College remains an accredited PLT provider. The College continues to enrol new students, who can then qualify to be presented before Bell's NSW Supreme Court for admission to practise in NSW, and from there, the rest of Australia.

While the College is not a university, graduates in Law from the universities cannot be admitted to practise law without the PLT. The College should therefore be considered an extension of the tertiary system and hence within the terms of reference of this Inquiry. Additionally the College's PLT and other courses are supervised by the [Tertiary Education Quality and Standards Agency \(TEQSA\)](#).

TEQSA has made no comment about the findings against the College, and like the NSW LPAB maintains the College's PLT and the College's right to self-accredit.

Top Education Group Pty Ltd (trading since 2019 as the Australian National Institute of Management and Commerce)

[In his 2018 book "Silent Invasion" Professor Clive Hamilton](#) reports that in 2008 Top Education Group's founder, first Chief Executive and Principal, Zhu Minshen (deceased) organised students , including students from his Top Education Institute to protest against

Tibetans in Canberra , which counted towards the Top students' assessment. In Hamilton's words , Zhu's Top Institution (as it was previously known) is "perhaps the only accredited degree program in Australia that counts agitating for a foreign power towards its qualifications." [Zhu came to public attention in 2016 for his, and Top Group's part in former Senator Sam Dastiyari's political donation scandal.](#)

Hamilton provides details of Zhu's Communist Party China antecedents and his organisation of the 30,000 strong demonstration by Chinese students at the Canberra leg of the 2008 Beijing Olympic torch relay, many of them brandishing Chinese flags. This conduct was clearly an open challenge and in public defiance of, the AFP's directive to Chinese government security that they were not to be involved in the torch relay. As Hamilton puts it "ASIO shat themselves".

Despite this open defiance of the law that they are meant to defend and uphold the LPAB and its officers . working with TEQSA, determined that an exception should be made, [despite industry concerns about an oversupply of law graduates](#), to permit Zhu's Top Group to operate the [first and only law](#) school in Australia that is not part of a university. Scandal continues to follow Top Group, and much of it is in the public domain. What Hamilton has described as the ["fishy smell around Zhu Minshen's Top Education Institute"](#) persists. This includes the [NSW LPAB and TEQSA permitting Top to operate its law school for three months after its accreditation had expired](#), and [an IPO share scandal involving PwC](#) , which further compounded what appears to be [a ramp and dump of Top shares when it listed on the Hong Kong Stock Exchange in 2018, enabled by approvals from the NSW LPAB and TEQSA.](#)

Adding to the scandal [was Top Group's decision in 2019 to freeze enrolments, just after it received re-accreditation from the NSW LPAB](#), and TEQSA. Enrolments were frozen until early 2024 , just before its 2019 re-accreditation expired on 30 June 2024. As mentioned above, the accreditation was only renewed in October 2024. The NSW LPAB did not provide any explanation for its conduct in 2023/2024 Annual Report.

Conclusion

In light of the above it follows that TEQSA and the NSW LAPB's standing as regulators and overseers of legal training in Australia require immediate review. A separate inquiry into legal training and regulation is warranted, and an alternative to TEQSA and the NSW LPAB considered as a matter of urgency.

Failure to do so will result in a further loss of public confidence in the legal system, and of course, a lack of confidence in the skills of Australian lawyers here and overseas. Australia's reputation for high quality legal training is already taking a battering in Malaysia, where the College's misconduct was reported in 2019, [but never addressed by the College, the NSW LPAB , and TEQSA.](#)

Given Top Group's Hong Kong Stock Exchange listing which imposes on it continuous disclosure obligations it would be naïve to assume that the NSW LPAB and TEQSA's regulatory failures have gone unnoticed in Hong Kong and the rest of Asia. [The Top Group IPO enabled by the NSW LAPB and TEQSA's exceptional approvals, was what Asian investors would see as a classic case of license trading.](#)

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