

PSA member feedback: CEE function (CLE, LRT, and Comms) and SWAT restructures

WITHOUT PREJUDICE

- This document contains all feedback received by the PSA in relation to the proposed restructures of the CEE function (CLE, LRT, and Comms) and SWAT.
- The feedback is reproduced as received and is presented without prioritisation, endorsement, or assessment of merit.
- In some cases, individuals have submitted feedback themselves and then requested for the PSA to include their feedback in this combined document.
- The inclusion of any submission in this document should not be taken as indicating the PSA's support for, or opposition to, the views expressed.
- The feedback is provided in good faith to assist Legal Aid in understanding the perspectives of employees affected by the proposed restructures and any associated job losses.

PSA Feedback

After careful consideration of the feedback received, the PSA wishes to make the following general submissions:

- a. The timing of announcements to staff are causing distress. The main announcement is being made the day after a public holiday. While the PSA accepts that this is a working day, the consensus is that this announcement should be made either Wednesday or Thursday.
- b. There is a consensus Legal Aid has an insensitive approach for conveying career outcomes *"If there are changes to the proposal that impact you in a different way to what you were originally told, you will be advised of this directly in an individual meeting prior to the group briefing."*
A better approach would be for all staff whose positions are being deleted are provided direct advice. This could occur on Tuesday/Wednesday following the long weekend if the general announcement day was shifted.
- c. Job losses should be minimised.
- d. Opportunities for direct employment should be maximised (eg appointing from Talent Pools) in line with the GSEs provisions.
- e. Workplace psychosocial hazards should be minimised. It is noted that some feedback includes expressions relating to emotions the process has had on employees/members.
- f. Support appears to have been less than ideal and some feedback expresses that the employee feels isolated or uninformed. There is also feedback about failure to appropriately support impacted staff.

- g. Feedback around management of workload once the restructure occurs is concerning. The PSA seeks an understanding of what risk mitigation strategies Legal Aid have identified to ensure:
- Work overload is reduced
 - Burnout due to increased workloads
- h. Quarantining of front-line staff from hostility/negativity resulting from customers/clients who may no longer be eligible for Legal Aid support.
- i. Our members are concerned about maintaining Legal Aid's good reputation in the community given serious job losses are occurring along with a massive reduction in programs and support for the NSW community (based on monumental funding cuts)
- j. Members are concerned about managing organisational risk in the provision of accurate and current legal resources given some functions which had dedicated staff no longer present post-restructure. The PSA agrees with the general feedback received raising concerns about the reduction of service quality, accessibility/availability, and program delivery into the community.
- k. There is a general view, gained by way of meetings, emails and other feedback that Legal Aid's decisions around the restructure (to varying degrees) abandons the most legally vulnerable citizens of NSW. This is also underpinned by the funding reductions.

This could result in an increase in difficult client interactions for officers of Legal Aid across the breadth of CEE functions.

Feedback 1

Legal Aid NSW is proposing a restructure of the Statewide Advice Team (SWAT) to support the ongoing delivery of legal assistance services and to align SWAT with broader changes across the Client Services Division, including the integration of the Legal Resource Team within Content, Education and Engagement (pg 3, SWAT restructure proposal).

The term integration seems to be used loosely as only the Grade IV is being 'integrated' into the new structure and the work is apparently being absorbed by copywriters.

The way Legal Aid NSW determines, generates, and manages legal information content has not substantially changed for many years and remains primarily organized around internal structure, demands and historical models rather than user and client needs.' (Page 4, CEE restructure proposal)

LRT does develop resources based on user and client needs. Identifies these needs:

- Using data that is collected and discussed at LRT planning day
- From LawAccess NSW
- From own experience providing advice to clients

	▪ From SWAT staff suggestions ▪ From suggestions from broader Legal Aid NSW – like e-bikes request ▪ From website feedback and thumbs-up thumbs-down widget. ▪ A lot of issues on website where user and client needs were not considered were not decisions taken by LRT – e.g. naming of legal topics was not guided by user and client needs. LRT is not responsible for these issues but is working to fix these issues. ▪ LRT is highly responsive to needs to clients/customers and general public, and stays on top of legal trends/issues: ▶ E.g. AI resources already available ▶ E-bikes ▶ Character references Flow on issues as a result of LRT being dissolved: 1. Less advice avenues - more traffic goes to LawAccess - longer call times - reliance on digital resources increases. 2. Advisory committee report – 62% increase – AI helped customers find LA. a. AI is only as good as info available. b. Lots of bad information online – LRT resources can be an antidote to that building on public’s trust of LA to provide accurate and correct information. 3. LRT resources help people make the right decisions when dealing with their legal problem – reduces delays/burden on court system posed by self-represented litigants (hard to quantify how much impact these resources have, but definitely significant) 4. LRT and LawAccess have a very strong relationship - LawAccess provides direct feedback from customers about resources to LRT. This is a large volume of high-quality feedback. It is essential to maintaining high-quality resources. Relationship would be lost under proposed model. Any other opportunities for feedback on resources requires spending money – this is free. 5. LRT has developed relationships w/ people/organisations outside of LA. These organisations rely on LRT to support the work they do. e.g. NCAT request for consumer topic. Questions to be considered:
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	1) Is it correct that the two new copywriters and the content lead will share responsibility for the ongoing maintenance and legal review of LRT's website content (below)? a. 592 pages of MPIA b. 138 pages of LawPrompt content and c. 498 samples, templates, and forms (individual pdf and word documents) ▪ Has Legal Aid decided that the above pages and resources should be maintained less frequently or less accurately than at present? ▪ If not, how will two copywriters and one content lead role absorb this workload in addition to that of their other roles within the Content Design Team? 2) Qualifications for the copywriter roles currently do not list anything legal. How will copywriters have the legal technical skills needed to interpret and understand complex interrelated legislative instruments? Understood that it is not an expectation of copywriters to have a legal background, but the work is complex and at the very base level, the copywriter would need legal training to interpret legal instruments to be able to convert that into plain language resources. It's also necessary to be able to maintain whatever legal information is publicly available. Even with oversight from the proposed business partners, the person preparing the content from scratch would need to have legal training or expertise. Legal technicality of our work eg form filling requires knowledge and experience beyond that of copywriters 3) If the pages are not maintained as frequently as at present or to the same standard, what consideration has been given to how this will impact LawAccess customers if their legal information is incorrect? 4) Page 4 of the CEE Restructure Management Plan, it is noted that a <i>"strategic challenge limiting Legal Aid NSW's ability to deliver an efficient, modern, client-centred legal information and education service includ[ed]... legal and content expertise not being used in the most effective and efficient way, with lawyers spending significant time drafting content while specialist digital and communications capability is limited."</i> a. Was this comment intended to refer to LRT lawyers? b. In the new structure, who will do LRT's work evaluating and implementing legal changes to the ~600 MPIA pages, Lawprompt or numerous court forms, or is the work relating to expected that LRT's roles be wound down? c. If it is to be continued, is there an expected handover? Impact on Law Access
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	1. What is proposed for ongoing legal maintenance and legal review of approximately 138 pages of LawPrompt content and 592 pages of MPIA content? 2. What are the impacts to customers if LawAccess can't provide legal information – more advice appointments, longer waiting times? 3. Who will be responsible for the legal change? 4. What consideration has been given to the impact of less regularly or less accurate legal updates on MPIA? Particularly as it relates to stakeholders
	Impact on public and stakeholders ▪ Given that LawAccess IOLs use the content on the Legal Aid website for the information services, how will the legal risk of incorrect information be addressed? ▪ Given the reliance that stakeholders like Revenue NSW, NCAT, Local Court, Fair Trading have on our content, are. Even if the senior partners are involved in liaising with external bodies, unlikely that the workload will be able to be managed by a copywriter and senior copywriter who have no legal training. Also, would the senior partners be able to allocate work to the copywriter/senior copywriter? ▪ Have the ongoing risks been considered if the site is to remain but left unmonitored.
	Substantive points to make ▪ We think it's prudent that lawyers be the ones to draft content due to the technical nature of legal change and interpreting and understanding legislative instruments. ▪ Is there any scope for the newly proposed senior copywriter or copywriter positions to be converted to lawyer positions, similar to the proposed CLE structure? ▪ It would make more sense for the people preparing the content to report directly to the senior partners to ensure legal accuracy, oversight and quality assurance. ▪ LawAccess relies on the current legal information created and maintained by LRT every day.. BetterSearch utilizes this information to be able to assist the information officers to complete their work.
	I forgot to add, that they also state that the current LRT Grade IV is a permanent employee with a direct assignment to business partner.

	Since the current Grade IV is on a temporary contract, would exec be considering opening up a EOI or other recruitment process for consideration of the business partner position. There are multiple permanent Grade I-III lawyers in the LRT who currently sit in a current Grade IV talent pool.
	Looking at the SWAT restructure document, they also point out that any services that will be cut will be referred to LawAccess for information or referral services. Since the LRT is going to be dissolved, if no content is created to fill the gap, those customers will receive no legal assistance as most would not be able to get into other legal services for assistance either.
	Comparison of the job descriptions - Legal Officer I-III SWAT and LRT - Senior copywriter - Copywriter. The comparison highlighted 5 main risks: 1. No identified legal subject matter experts 2. Legal change may not be identified or implemented 3. Quality and accuracy of legal content 4. Impact on LawAccess NSW 5. Increased organisational legal risk. Furthermore, although it is not a part of the LRT's job description, all of the lawyers have extensive knowledge and experience in the following (which have been listed as required for the newly created roles): - Analysing search and statistical data - SEO optimisation -Content performance analysis - user experience/ content design considerations and writing to meet accessibility standards

	-editorial experience. Key observations from the last page: "The strongest theme emerging from all three role descriptions is that the proposed copywriter roles appear designed to work alongside legal experts, not replace them. Both copywriter roles expressly assume legal review, legal assurance and access to legal subject matter experts, yet the restructure appears to remove the very lawyers who currently perform those functions. This raises a key question for the restructure: if LRT lawyers are removed, who will perform the legal functions that the Senior Copywriter role expressly assumes will be performed by legal subject matter experts and lawyers?" My comments: Instead of creating new roles, it would be in Legal Aid's best interests to re-design the structure to have the Legal Officers I-III preparing and maintaining content.
Feedback 2	Questions About the Transition Process ▶ Need more information about the matching period. ▶ How does the Workforce Matching Process (WMP) actually work? ▶ What are the implications of a potential public sector shutdown? ▶ There will be one Grade IV role in CLE that staff can apply for. ▶ BP roles were initially forecast as rotating roles, but staff were later advised that, because existing roles were being relinquished, those positions needed to be allocated to people. ▶ Possibility of increasing lawyer roles during the transition period. ▶ Concern raised that lawyer positions are being removed while Communications is receiving three new roles. ▶ Staff on parental leave can apply for roles now but are not required to do so. ▶ What happens when they return if they have not participated in the process? CLE Officer Role Changes ▶ Proposed name change from Solicitor 1-3 to "CLE Officer". ▶ Role description appears to:

	○ Remove legal research functions. ○ Remove the capability to provide legal advice. ▶ CLE Officers may not report to a lawyer.
	Role Description Concerns ▪ Occupation-specific requirements appear to be missing from the CLE Officer role description. ▪ Will CLE Officers be responsible for monitoring legal changes? ▪ If so, how much time will be allocated for this work?
	Website/LawPrompt content quality control and governance concerns ▪ Not convinced that quality control and governance arrangements have been adequately explained. ▪ It seems unrealistic for BPs to act as reviewers. ▪ LawAccess should be included in consultation as one of the key stakeholders of the website and LawPrompt content to provide information services to clients. ▪ LawAccess impact: ▪ Reduced triage will increase reliance on providing information only services. ▪ Reliance on Better Search tool to provide information services – AI tool that uses a closed knowledge base of the website and LawPrompt. ▪ Potential legal risk for the organisation if content is inaccurate or not properly reviewed. ▪ Strong processes already in place for website governance by LRT. ▪ LRT function of monitoring legal change in order to update content in response to legislative change - not clear how the new structure will continue to support this function.
	Recruitment Process ▪ Who will be reviewing EOIs?

	▪ Advice provided in Q&A: Principal Manager – new role that will need to be recruited first, so timing? ▪ Will the CLE Lead be responsible for recruiting CLE Officers?
Feedback 3	Feedback on Consultation and Communication ▪ Q&A sessions have felt tense. ▪ Current Town Hall Q&A process is not fit for purpose and does not feel psychologically safe. Individual circumstances ▪ Legal officer. ▪ Has worked across LA and the CLC sector for the last 11 years. ▪ Currently working part-time while her daughter is young. ▪ Substantive role is 35 hours per week, currently working XY hours per week. ▪ <redacted> is undertaking the additional hours. ▪ Agreed for PSA IO to put forward the relevant concerns on her behalf if appropriate. ▪ Has been feeling significant stress and uncertainty throughout the process. How Staff Became Aware of the Changes ▪ <redacted> became aware through informal discussions that certain team members were having one-on-one meetings. ▪ As a result, they became increasingly anxious and expected she would also be called to a meeting. ▪ By 5.30 pm on Friday, having heard nothing, they thought they was unlikely to be affected. ▪ At 9.36 am on Monday, they received a calendar invitation for an 11.30 am meeting and was advised to bring a support person. ▪ Receiving the meeting invitation caused significant distress. ▪ <redacted> experienced a panic attack, called their partner, and was crying for approximately an hour due to anxiety. ▪ Their partner left work to act as the support person at the meeting. ▪ <redacted> appeared surprised that <redacted> had brought their partner as a support person.

	▪ <redacted> felt the timing and manner of communication were insensitive. They considered the process unsafe given them anxiety. ▪ While <redacted> may not have been aware of their anxiety, <redacted>'s direct supervisor was aware. Current team ▪ Person 1 ▪ FT role but has been working part-time for an extended period. ▪ Person 2 ▪ Works three days per week. ▪ Holds a permanent 0.6 FTE position. ▪ Person 3 ▪ Currently on secondment in HR – DEI Manager (role impacted by HR restructure). General ▪ Member 3 has been proactive and willing to ask questions on behalf of the team. Communication and Consultation ▪ Concerns were raised about communication throughout the process. ▪ There is a perception that information has not been shared openly and that consultation has been limited. ▪ Team meetings with Manager have been awkward because Manager is not affected by the proposed changes in the same way as other team members as will be directly assigned to a role. Changes to the Role ▪ Concerns have been raised about changes to the role’s responsibilities and reporting arrangements, including the removal of the advice-giving function from RD. ▪ The proposed change in title from Solicitor to CLE Officer is viewed as a significant shift in the nature of the role. ▪ There are concerns that these changes will result in the deskilling of the position and a reduction in its legal focus.
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	Some staff perceive the changes as part of a gradual move away from maintaining the role as a legal position, with a concern that the role may ultimately be redesigned as a non-legal role once current incumbents leave.
	Nature of the Work - Working with high-needs schools is viewed as a valuable and important aspect of the role. - There is concern that the role may become heavily focused on webinars and similar activities rather than direct engagement due to reduced capacity. - CLE outreach is considered by staff to be a core and essential part of the role and should remain so.
	Questions Raised - How were these decisions reached? - Why is there a focus on maintaining or increasing non-legal roles? - Why are legal staff being reduced where lawyers are required to deliver CLE services?
	Workforce Matching Process (WMP) - Understanding is that the Workforce Matching Process may provide access to a limited number of roles that are broadly similar to current duties. - There is uncertainty about what opportunities will actually be available.
Feedback 4	Legal Officer Grade I-III Job Title The previous role title of 'Solicitor Grade I-III (CLE)' should be retained over the proposed role title of 'Community Legal Education (CLE) Officer'. Alternatively, the role title should be changed to 'Community Legal Education (CLE) Solicitor'. The revised role description continues to require and rely upon legal qualifications (including a NSW Practising Certificate), legal knowledge and legal professional skills. While the role has evolved to include stronger elements of education design, community engagement, accessibility and digital learning, legal expertise remains a fundamental and distinguishing feature of the position. The role description continues to require the incumbent to: Hold legal qualifications, be admitted as an Australian lawyer and hold a NSW practising certificate.

	▪ Undertake legal research and analysis. ▪ Interpret legislation and legal principles. ▪ Develop legally accurate community legal education resources. ▪ Work with legal subject matter experts to ensure legal accuracy. ▪ Translate complex legal concepts into accessible information for the public. ▪ Exercise professional judgment regarding legal content and risk. These responsibilities distinguish the position from a general education, communications or community engagement role. The legal qualification is not merely desirable or incidental; it is an essential requirement and a core reason why the role sits within the Legal Officer Grade I-III classification structure. Removing 'Solicitor' from the title risks creating ambiguity regarding the professional nature of the role and understates the specialist legal expertise required to perform it effectively. Already internally there is confusion regarding whether 'CLE' refers to 'Continuing Legal Education' or community engagement rather than 'Community Legal Education'. Removing 'Solicitor' from the title would further exacerbate this confusion for internal stakeholders, external partners and prospective applicants about the level of legal knowledge and professional standing expected of the position. Removing 'Solicitor' from the title is also inconsistent with standard industry practice. Across community legal centres Australia-wide, community legal education lawyer roles are described as such. For instance, the Justice Support Centre describes their community legal education lawyer as a 'Civil Law / Community Legal Education Lawyer', NAAJA uses the term 'Community Legal Education Solicitor' and the Kingsford Legal Centre has a role titled 'Community Legal Education Lawyer/Clinical Supervisor'. Similarly, in other legal aid commissions across the Commonwealth the nomenclature of using the terms 'lawyer' or 'solicitor' remains consistent, for example Legal Aid ACT uses 'Lawyer, Community Legal Education' and Legal Aid Western Australia uses the term 'Solicitor - Community Legal Education & Training'. Finally, to both attract lawyers to apply for community legal education positions as they may arise and support the career development of existing community legal education lawyers, it is important that there is not the perception that community legal education work is considered less valuable than other legal work. By retaining the term 'Solicitor' rather than 'Officer' in the title of the role description, it maintains the impression that working in community legal education is a lateral move rather than giving the perception it is a downgrade. The current change in title coupled with removing the occupational specific complimentary capabilities of legal research and legal advice (discussed below), appears to devalue and deskill community legal education lawyers, but retaining the existing nomenclature would assist in avoiding creating that negative perception.
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	If a title change is considered necessary to better reflect the increased focus on education and engagement, a more appropriate title would 'Community Legal Education (CLE) Solicitor'. This title achieves the intended emphasis on the specialist function of the role while still recognising its professional legal status and being consistent with industry standards. Retention of Occupational Specific Complimentary Capabilities (Legal Research and Legal Advice) The occupational specific complimentary capabilities of Legal Research Level 1 (ie undertake legal research) and Legal Advice Level 1 (ie provide quality independent legal advice and explanation of legal issues) should be retained in the Legal Officer I-III community legal education role. Similarly, the key accountability 'undertake legal research when developing community legal education resources and provide legal advice during the course of community legal education work when requested, on an ad hoc basis' also be retained in the revised position description. First, considering the occupational complimentary capability of Legal Research. While the role description of the 'Community Legal Education (CLE) Officer' lists 'undertak[ing] legal research' as a key accountability and requires 'sound knowledge of legal practice, legal research and the legal issues and service pathways relevant to Legal Aid NSW clients and priority communities' as key knowledge and experience criteria, the occupational specific complimentary capability was omitted. I strongly suggest it be retained to reflect that it is still an inherent requirement of the position. Second, considering the occupational complimentary capability of Legal Advice. In 2024 the Community Legal Education Branch added legal capabilities to solicitor role descriptions. The purpose of adding legal capabilities was to acknowledge that community legal education solicitors undertake legal research when developing community legal education resources and, importantly, enable solicitors to provide legal advice during community legal education work. This means that Community Legal Education solicitors can provide advice to participants that attend community legal education events and workshops when requested, on an ad hoc basis, in accordance with the Community Legal Education Advice Process Guide. The ability to provide legal advice to clients, rather than referring clients, is crucial for several reasons. First, face to face community legal education workshops delivered in regional and remote locations are often done so because there are no legal services in that area. These can be areas where there is limited telephone reception or internet access or the clients have difficulty navigating virtual communications. Meeting clients where they are and being able to assist them on-the-spot provides immense value to the client, but also saves other teams time from having to do a client intake, allocate a solicitor to the client and attempt to contact the client (oftentimes unsuccessfully due to the aforementioned telephone and internet access issues). Second, many of these clients are Aboriginal and Torres Strait Islander people who have a historical distrust in government services or young people who are statistically less likely to later contact Legal Aid NSW or another legal service provider about their issue. Getting clients off the referral roundabout - where clients have to retell their traumatic stories repeatedly, receive fragmented advice, and can ultimately fall through the cracks of
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	the justice system - can sometimes be achieved simply by providing clients with timely advice when they are ready and eager to receive it. Finally, a comprehensive policy titled the 'CLE Advice Process Guide' was developed in January 2024 and revised in March 2024. This policy was developed in consultation with all practice areas and in-house counsel and ultimately approved by the Legal Practice Sub-Committee in February 2024. The policy regulates the way community legal education solicitors undertake, record and manage advice. The policy could be easily adopted by the Content, Education and Engagement team to ensure that solicitors can continue to provide advice to vulnerable clients who otherwise would miss out on legal assistance. Thank you in advance for your consideration. If you have any questions or require further information, please do not hesitate to contact me.
Feedback 5	For the organisation to be operating in a ~\$20million deficit, I can only assume, with my very limited knowledge of how government organisations operate, that there has been mismanagement of funds which is resulting in reduced services and job losses across the organisation. Is the organisation taking any responsibility for this mismanagement? For example, are the executive leaders receiving pay increases this year, and if so, is this appropriate considering the circumstances?
Feedback 6	<u>Submission: Retention of the Family Grade V Role</u> Executive Summary It is my primary submission that the Family Grade V Senior Solicitor role should be retained within the proposed SWAT structure. If it is determined that one Family Senior Solicitor position must be removed, my alternative submission is that the Family Grade V Senior Solicitor role should be retained and the Family Grade IV Senior Solicitor position should instead be identified for deletion from the Establishment. This submission is supported by: 1. The nature, scope and comparative accountability of the two roles. 2. The extent to which each role's functions can be redistributed. 3. Workforce benchmarking across Legal Aid NSW. 4. The continuing need for specialist family law leadership and supervision.

	5. The complexity, client risk and supervisory demands arising from the revised triage model. 6. Workforce management, WHS and risk considerations identified in the Restructure Management Plan ("RMP"). The Family Grade V role carries broader responsibility for family law service delivery, operational leadership, workforce management, performance, wellbeing and organisational outcomes. While the Family Grade IV role performs important specialist, supervisory and capability development functions, it does not carry the same breadth of operational leadership and organisational accountability. Importantly, the RMP expressly states that the proposed restructure is intended to maintain effective family law services. It does not identify any reduction in: ▪ Family law staffing numbers; ▪ Family law service delivery; or ▪ The requirement for specialist family law supervision and leadership. Rather, the revised triage model will result in SWAT Family dealing with a higher concentration of high-priority clients and matters involving significant legal consequences. In the absence of a dedicated Family Grade VI role, the Family Grade V role represents the stronger ongoing business need. Its retention is supported by the continuing requirement for senior family law leadership, the unchanged number of family law solicitors, the increased complexity of matters retained within SWAT Family and the need for a complete and effective specialist supervision model. 1. The Family Grade V Role Delivers SWAT's Core Business The position description for the Family Grade V role states that its primary purpose is to: <i>"Provide senior management and leadership in the provision of timely high-quality legal advice. This includes directly providing legal services to clients of Legal Aid NSW, including in more complex matters."</i> The role therefore combines direct legal service delivery with responsibility for family law leadership, workforce management, service levels, complex advice and operational outcomes. The Family Grade IV position description identifies its primary purpose as supervising and leading legal officers in the provision of legal advice, or developing and maintaining legal information resources, together with supporting and training staff. However, its position description does not assign the same breadth of operational leadership, workforce management and organisational accountability as the Family Grade V role.
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	The relevant question is not whether both roles perform valuable functions. They do. The relevant question is which role performs functions that cannot readily be absorbed elsewhere without creating a gap in operational accountability. <u>If the Family Grade V role ceased to exist, responsibility for operational management, workforce leadership, service delivery outcomes and practice accountability would be dispersed across multiple positions rather than resting with a dedicated family law leader, increasing the risk of duplication, inconsistency and gaps in accountability.</u> <u>If the Family Grade IV role ceased to exist, its functions would be more readily capable of redistribution among experienced family law practitioners, including the Family Grade V, subject to appropriate workload allocation and without creating the same gap in operational accountability.</u> 2. Workforce Benchmarking Supports Retention of the Family Grade V Position A comparison of available Family Law Division staffing structures indicates a consistent organisational model:
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Team Name	VI and practice area	V	IV	I-III
DVU	2 – family	5	11	20
EIU	1 – family	2	6	16
FAMAC	1 – family	2	2	6
Child Support Service	1 – family	0	1	6
Parramatta	1 – family	1	3	8
Sydney	1 – family	4	7	9
Bankstown	1 – family	0	3	4
Penrith	1 – crime	1	1	3
Gosford	1 – crime	1	2	3
Blacktown	1 – family	0	1	1
Newcastle	1 – family	0	5	3
Campbelltown	1 – crime	1	2	4
Wollongong	1 – family	0	3	4

Excluding specialist units:

- Offices or teams with a Family Grade VI do not always require a Family Grade V because the Grade VI performs the senior family law leadership function.
- Offices and teams without a dedicated Family Grade VI retain a Family Grade V position to perform senior family law leadership and supervision functions.

SWAT falls into the second category. Although the SWAT Solicitor in Charge holds a Grade VI role, SWAT does not have a dedicated Family Grade VI position providing specialist family law leadership and practice management.

	The RMP confirms that Legal Aid intends to maintain effective family law services within SWAT. At the same time, the revised triage model will direct lower-priority matters away from legal advice services while retaining high-priority clients and matters involving significant legal consequences within SWAT. The consequence is not a reduction in the need for family law expertise, but a concentration of more complex and higher-risk work. In those circumstances, the need for dedicated family law leadership and supervision is increased rather than reduced. Removing the Family Grade V role would leave SWAT as an outlier compared with other Family Law Division structures that retain senior family law leadership where no Family Grade VI position exists. 3. Effective Supervision of Family Solicitors Requires Specialist Family Law Leadership Under the proposed structure, some family solicitors will report to the Crime Senior Solicitor while continuing to undertake specialist family law work. This highlights the continuing need for accessible specialist family law leadership and supervision. Family law involves complex legal issues, significant professional obligations and regular exposure to trauma-related matters. Effective supervision requires specialist legal expertise, quality assurance, workforce development, risk management and operational leadership. The revised triage model will concentrate SWAT Family's legal advice services on high-priority clients and matters involving significant legal consequences, including matters involving the risk of loss of children and other outcomes with serious and lasting impacts on clients and families. The RMP further identifies the importance of maintaining effective oversight, support and workload management across the revised structure. Those objectives are more readily achieved through retention of the Family Grade V role than through a reduction in dedicated family law leadership capacity. 4. The Family Grade V Role Manages Critical WHS Risks One responsibility specifically assigned to the Family Grade V role is: <i>"Maintaining the wellbeing and mental health of solicitors in the team by closely managing work volume, vicarious trauma and psychological risks."</i> This responsibility reflects significant work health and safety obligations concerning workload, vicarious trauma, psychological hazards and staff wellbeing. No equivalent express responsibility for managing work volume, vicarious trauma and psychological risks is identified within the Family Grade IV position description.
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	The significance of this responsibility is reinforced by the RMP itself. The RMP identifies workload pressure, psychological stress, wellbeing impacts, uncertainty and change fatigue as key psychosocial risks associated with the restructure. Removing the Family Grade V role would remove the only position expressly assigned responsibility for managing these risks within the family law practice, without identifying an equivalent point of accountability within the proposed structure. The proposed structure does not clearly identify how those responsibilities would be redistributed or where operational accountability would rest. 5. The Proposed Supervision Model Does Not Support Deletion of the Grade V Role The RMP states that the Grade V position is proposed to be deleted because management and supervision responsibilities can be redistributed across the remaining Grade IV positions. However, the RMP also acknowledges that family solicitors will remain divided across different reporting structures and will continue to require specialist family law supervision. Some family solicitors will be line managed by the Crime Senior Solicitor while continuing to provide family law advice. Specialist family law leadership, capability development, mentoring, quality assurance, escalation support and technical supervision would therefore be concentrated in a single Family Grade IV position, despite those functions currently being shared across two dedicated family law leadership roles. The RMP acknowledges that: <i>"Further supervision, support and escalation arrangements will be refined through the design process to ensure staff continue to have appropriate access to expertise."</i> This demonstrates that the need for specialist supervision remains, but that the proposed replacement model has not yet been finalised. The business case for deleting the Grade V role therefore relies upon supervision arrangements that are still under development. The RMP does not explain how the additional responsibilities will be accommodated, how workload implications will be managed, or how potential gaps between line management and professional supervision will be addressed. The RMP also identifies role clarity and accountability gaps as restructuring risks. Retaining the Family Grade V role would preserve established leadership and escalation arrangements, maintain dedicated supervisory capacity and avoid reliance on an incomplete supervision model during a period of significant organisational change. 6. The Reduction in Teams Does Not Correspond with a Reduction in Family Law Staffing or Work The proposal relies in part upon a reduction in the number of SWAT teams as justification for removing the Grade V role.
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	However, the RMP expressly states that family law services will be maintained. It does not identify any reduction in family law staffing, family law workload or family law service delivery. Under the current structure, eleven Grade I-III family law solicitors are supported by a Grade V and a Grade IV Senior Solicitor. Under the proposed structure, eleven Grade I-III family law solicitors remain, but only one dedicated Family Senior Solicitor position is retained. The proposal therefore reduces dedicated family law senior supervisory capacity by 50 per cent without any corresponding reduction in the number of practitioners requiring supervision, the complexity of work performed, or the need for specialist family law leadership. This is particularly significant given: ▪ the greater concentration of complex and high-priority work under the revised triage model; ▪ the introduction of multiple reporting arrangements; ▪ the continuing requirement for specialist family law supervision; and ▪ the need to develop and implement new supervision and escalation processes. The RMP identifies the reduction in organisational units as the basis for deleting the Grade V role. However, it does not demonstrate a corresponding reduction in the underlying functions performed by that role. Conclusion The evidence demonstrates that the functions performed by the Family Grade V role continue to be required within the proposed SWAT structure. The RMP identifies the reduction in formal organisational units as a key reason for deleting the Grade V role. However, the proposal does not demonstrate a corresponding reduction in family law work, supervisory requirements, workforce management responsibilities or operational leadership needs. To the contrary, the RMP confirms that family law services will continue to be maintained, while the revised triage model will concentrate SWAT's legal advice services on high-priority clients and matters involving significant legal consequences. Removing the role would halve the number of dedicated Family Senior Solicitor positions, fragment responsibility for family law practice leadership, reduce specialist supervisory capacity and create reliance on supervision and escalation arrangements that have not yet been finalised.
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	The proposal does not demonstrate that the work performed by the Family Grade V role has reduced, ceased, or can be effectively absorbed without creating gaps in leadership, supervision, workforce management and accountability. To the contrary, the evidence demonstrates that the ongoing need for those functions is unchanged and, in several respects, increased under the proposed model. Accordingly, the Family Grade V role remains required within the proposed structure and should be retained. If one Family Senior Solicitor position must be removed, the Grade V role should be retained because it carries broader organisational accountability, provides the primary family law leadership function within SWAT and represents the stronger ongoing business need. In that event, the Family Grade IV Senior Solicitor position should instead be identified for deletion.
Feedback 7	Hello Anthony, I have just found out that the CLE 1-111 role description which was on our intranet and supposed to be the current one—is in fact incorrect and there is a more up to date one! Sorry still trying to find a copy of that. Later: Thanks —have tracked them down—the 2024 one reports to our grade 4 – and the 2023 one reports to our grade 6 so my comments still stand ... so maybe not strictly inaccurate but really hard to comment on things that are so hard to find.
Feedback 8	Comments about Restructure CEE C10022019 Community Legal Education Branch Process. I have found that the process has been distressing and hard to follow. The proposals and outcomes were somewhat lost in the explanatory content instead of clear information on what was proposed. The initial process also seems to have been effected by a need to hurry as the director involved was needing to go on leave. I was on leave when this occurred. I was rung by the director who left messages to call back as my job was effected by the restructure. I decided I needed to continue my holiday as unstressed as possible and deal with things when I got back the following week, so I elected not to call back and send a text saying that. When I returned, I was overwhelmed by the nature of the cuts but also the amount of unclear information I had to wade through. The information was sent to my personal email which I tried to access the day before I returned to work but the file was not fully accessible and needed passwords I was not given. I was only able to access it after I re-sent everything back to my legal aid email address and PC. I have not been able to find a recording of the first meeting where the CEO attended.

	I found that the information was very opaque- and there was no clear description of what was actually going to happen. I found that I was piecing the information together by reading through documents plus the meeting videos I had missed. Because of this I still feel I am not really on top of it. I work part time and have not been able to attend any of the consultation meetings. I found the meetings difficult as they were big, with different needs from the different groups effected and I felt asking questions was too intimidating. I have not had time to catch up on all the meetings. I have not worked out if there is a process for any individual meetings. In the second week of meetings some specific questions about roles could not be answered, and the meeting was told by the acting director that that was a question for the director (who is on leave). Given my caring responsibilities I am thinking about the option of redundancy but I feel I cannot ask about this in a public setting until I make up my mind. I am finding understanding the redundancy process and how it might apply to my situation difficult. General points. ▪ The cuts to legal aid front line services and to service delivery, means that the need to provide community legal education is crucial. As other legal aid services are reduced, the role for education to help people understand issues themselves and self-help is even more important. ▪ Community legal education is one of the statutory roles of the organisation , written into our legislation, and a core component of legal assistance services. It seems this function is being downgraded in this restructure. The restructure seems very communications heavy at the expense of community legal education. ▪ It is unclear how the Communications and CLE teams will integrate and manage different ways of working, as Comms. is quite internally focused with a more corporate culture whereas CLE is focused on clients and vulnerable groups and has a level of flexibility in order to best meet the needs of our client groups. ▪ The lines of responsibility, quality control and governance are hard to follow. ▪ A problem is who approves legal content? The principle Manager and CLE lead do not have to be a lawyer and the new grade 4 roles have so much content in them it is unclear if it feasible for them to manage so much including approvals in a timely manner. ▪ Other positions - In relation to the grade 6 lawyer position (removed) and the grade 9/10: ▪ In 2017 there was a restructure where one of the reasons was that it was felt that it was not suitable for a grade 9-10 to be “supervising lawyers and approving legal content – just wondering what has changed now to bring back the pre-2017 situation?
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	▪ It was said in the 2017 restructure that a grade 6 lawyer was needed to have an impact with higher levels of the Legal Aid NSW to get approvals, cooperation and ensure CLE 's importance in the organisation. I am concerned that this function would not be able to be properly fulfilled by grade 4 lawyers given their huge list of other responsibilities, and the fact they are dealing with many senior staff above that grade. Is a higher level legal position is needed? (may not need to be grade 6.) ▪ Administration officer clerk grade 3-4 – It seems CLE is losing much of its admin. support as this role will have to support the larger communications structure. ▪ Video and content creator—this has been a vital part of CLE delivery. The amount of internal work this role will now have to take on is unclear and may mean limited time for CLE. Role description issues -Legal officer 1-111 ▪ The role title has changed from the current 'Solicitor Legal Officer Grade 1-111 Community Legal Education' to 'Community Legal Education(CLE) Officer'. The importance of being a lawyer in this role is not clear from the start. Hopefully this is not being downgraded? A current NSW practicing certificate remains an essential requirement but this is not clear until several pages into the role description. The term 'lawyer' or 'solicitor' should remain in the role title. ▪ A number of lawyers in the team need to give legal advice when they speak to certain vulnerable groups. A submission was made to include this function in the job descriptions maybe 1-2 years ago but now this has now been removed. Given the cuts to other services, and the fact that often we talk to very vulnerable groups in remote areas it might be the only chance they have to get crucial legal advice. Given the vulnerability of many groups they find it difficult to follow up on a referral. ▪ 'Key relationships' heading: the lines of approval for legal content and are difficult to follow. ▪ The new role description is much more 'wordy' , so its quite hard to compare to the current role. Things that seem to be removed from the role description – ▪ As mentioned - providing legal advice. ▪ providing guidance and support to staff across the organisation about delivering CLE. Given its only a small team and Legal Aid is a statewide organisation- building the capacity of others in the organisation to deliver CLE is important. ▪ Other issues—Working with children's check has been added as an essential requirement. Not all of us currently have this. Is it necessary to get it before we apply? Suggest that it does not need to be an essential requirement and can be something to be obtained later if needed?
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	The levels of capabilities have been expanded. Four capability levels have been raised - they have gone from intermediate to adept, and technology and project management has gone from foundational to intermediate. I am not quite sure about the implications of this- does it mean a higher level of skill is now required so that the roles are not in effect the same?
Feedback 9 From Q&A session	With respect to only civil law, external legal services/community legal centres such as the Tenants Advice and Advocacy Service, FRLC, etc, are all under resourced. Many clients come to us having been told by those services that there is no capacity for them to be helped. So when the proposed restructure management plan identifies these types of legal matters as “medium impact matters for non-priority clients” that will be triaged to outside of Legal Aid going forward, have these community legal centres been made aware: ▪ that the roles of the civil lawyers of SWAT are being removed? ▪ and may mean more clients coming their way so they can prepare the best they can for that influx? Separate to that, re. high impact matters for the highest priority clients in civil and family law that will be triaged to in-house legal teams: How are those in-house teams now resourced to do that? Have there been new roles added within those teams?
Feedback 10	Feedback on the Principal Manager role This feedback supports regrading the Principal Manager role to a Director role because it describes accountabilities that extend beyond conventional Grade 11/12 grading. The role has enterprise-wide strategic, governance, prioritisation, resource-allocation and transformation responsibilities, with a broad span of specialist functions and direct engagement with senior executives. Regrading would better align the role’s classification, authority and with its actual scope, complexity, organisational influence and level of accountability. Similarities to Director roles The following outlines the specific similarities to other Director roles in the organisation. 1. Strategic leadership Director roles focus on setting statewide strategy, influencing organisational priorities and leading major service systems. The Principal Manager CEE role similarly: • Develops the CEE strategy

	• Sets the forward work program • Determines investment priorities • Establishes enterprise standards • Leads transformation of a new organisational function This is significantly more strategic than many existing Grade 11/12 manager roles. 2. Enterprise-wide influence Directors influence the whole organisation through Executive participation and cross-divisional leadership. The Principal Manager CEE role similarly: • Influences all divisions • Manages organisation-wide content and engagement standards • Supports executive prioritisation decisions • Resolves cross-divisional issues This is broader than most manager-level roles, which usually operate within a single function. 3. Governance and prioritisation responsibilities Directors determine priorities across large portfolios and competing organisational demands. [The Principal Manager CEE role similarly: • Owns the intake process • Manages portfolio prioritisation • Applies enterprise prioritisation criteria • Manage a significant budget and makes financial decisions This resembles director-level portfolio management.
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	4. Leading organisational change Director roles contain strong accountability for transformation and reform. The Principal Manager CEE role similarly: • Will be required to establishing a new function • Integrating previously separate teams • Driving new governance • Embedding a new operating model This is an unusually significant change mandate for a manager role. 5. Large span of control Directors lead other senior managers. The Principal Manager CEE role similarly: • Content & Education Leads • Channels & Engagement Lead • Senior Partners • Events Manager • Administrative Officer This is effectively leadership of multiple specialist sub-functions rather than supervision of a single team. Role focus capabilities Further the role focus capabilities should be reviewed to align with the expectations of the role under key accountabilities. There are some capabilities that are under graded. An obvious concern is the foundational grading of the 'act with integrity' capability. No manager 11/12 should have any foundational capabilities let alone an essential requirement for any people leader.
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The following capabilities should be reviewed and considered reassessed as follows.

Focus capabilities				
Capability group / sets	Capability name	Proposed level	Appropriate level	Rationale for change
Personal Attributes	Display resilience and courage	Adept	NA	NA
Relationships	Communications effectively	Advanced	Highly advanced	The role requires communication at an organisation-wide and executive level, not only within a team or business unit. It must translate complex legal, policy and technical information for diverse audiences; set enterprise standards; influence Executive Directors and senior leaders; resolve divergent cross-divisional views; and provide credible advice on high-risk, sensitive and contested matters. These accountabilities, together with external engagement across government, justice and community sectors, are more consistent with Highly Advanced communication capability and support the proposed Director-level scope.
	Commit to customer service	Advanced	NA	NA

		Influence and negotiate	Advanced	Highly advanced	The role must influence Executive Directors, senior leaders and professional staff to agree priorities, manage competing demands and resolve cross-divisional issues. It negotiates legal input, assurance and stakeholder engagement across divisions; and builds partnerships with government, justice and community organisations. The scale, sensitivity and organisational impact of these negotiations often involving legal, reputational, budget and service-delivery risks and are more consistent with Highly Advanced capability and the proposed Director-level scope.
	Results	Deliver results	Advanced	NA	NA
		Plan and prioritise	Advanced	NA	NA
	Business enablers	Project management	Adept	NA	NA
	People management	Manage and develop people	Adept	Highly Advanced	The role leads a large, multidisciplinary function comprising several specialist streams and senior roles, rather than a single operational team. It must establish clear role boundaries and performance standards, build capability, align work across strategy, content, education, channels, engagement and business partnering, and manage performance through a significant transition to a new enterprise operating model. The scale and complexity of developing senior staff, integrating previously fragmented teams, sustaining cultural safety

					and service continuity, and embedding new ways of working are more consistent with Highly Advanced people leadership and the proposed Director-level scope.
		Manager reform and change	Advanced	NA	NA
	Personal attributes	Act with integrity	Foundational	Adept	Foundational is not appropriate for a senior people leader with enterprise-wide governance and stewardship responsibilities. The role establishes and governs standards for public legal information, legal review, accessibility, quality assurance and content lifecycle management; manages budgets, suppliers and operational risks within delegation; and provides advice and escalates matters involving significant legal, and reputational risk. It must model ethical conduct, apply public sector values consistently and foster accountability across multiple specialist teams and external partnerships. These responsibilities require at least Adept capability.
		Manage self	Adept	NA	NA
		Value diversity and inclusion	Adept	Advanced	The role has organisational-wide responsibility for ensuring public legal information, education, communications and digital channels are accessible, inclusive and responsive to diverse communities across NSW. It must embed accessibility and plain English standards, use audience research and lived-experience feedback to shape services, and build partnerships with

					community organisations and trusted intermediaries supporting priority audiences. As a senior people leader, it must also foster cultural safety, address bias and ensure diverse perspectives influence strategy, governance and service design. These accountabilities require Advanced capability rather than Adept.
	Relationships	Work collaboratively	Adept	Advanced	The role depends on sustained collaboration across the whole organisation and with external partners, rather than cooperation within a single team. It must align Executive Directors, legal divisions, senior partners, frontline services, regional offices and enabling functions around shared priorities, standards and delivery pathways; coordinate legal input, assurance and stakeholder engagement; and build partnerships across government, justice, community and supplier networks. The complexity of integrating previously fragmented functions, resolving cross-divisional dependencies and delivering coordinated enterprise outcomes requires Advanced collaboration capability rather than Adept.
	Results	Think and solve problems	Adept	Advanced	The role must solve complex, organisation-wide problems that involve competing legal, operational, audience and reputational considerations. It is responsible for designing a new service model, integrating previously fragmented functions, using research and performance data to prioritise investment, rationalising duplicated content and resolving cross-divisional dependencies. The breadth, ambiguity and

					strategic consequences of these decisions require Advanced capability rather than Adept.
	Results	Demonstrate accountability	Adept	Advanced	The role operates with a high level of autonomy and is accountable for organisational standards, service performance, operational risk and expenditure within delegation. It makes recommendations on resource trade-offs and investment priorities, ensures legal review and quality assurance requirements are applied, and must escalate matters involving significant legal, reputational, financial or cross-divisional risk. Its decisions affect organisation-wide channels, public legal information and the allocation of resources across multiple specialist services. This breadth and consequence of accountability require Advanced capability rather than Adept.
	Business enablers	Finance	Intermediate	Advanced	The role is accountable for managing the CEE operational budget and supplier expenditure across content production, campaigns, publications, accessibility, research, digital channels, events and community legal education. It also recommends resource and investment trade-offs, directs finite resources to the highest-value activities and influences broader organisational expenditure by reducing duplication and improving prioritisation. The scale, diversity and strategic impact of these financial decisions require Advanced capability rather than Intermediate.
		Technology	Adept	NA	NA

		Procurement and contract mgmt.	Intermediate	NA	NA
	People management	Inspire direction and purpose	Adept	Advanced	The role is responsible for establishing a new enterprise function and setting the CEE strategy, forward work program, priorities, standards and operating model. It must create a clear shared purpose across multiple specialist streams, translate organisational priorities into coordinated delivery, and align staff, senior partners, Executive Directors and other leaders around new ways of working. Leading staff through significant structural and cultural change while maintaining service continuity and building commitment to an evidence-based, audience-centred model requires Advanced capability rather than Adept.
		Optimise business outcomes	Adept	Advanced	The role is responsible for optimising people, budget, supplier and channel resources across a multidisciplinary function. It must allocate capacity against user need, legal risk, audience impact, urgency and organisational value; manage multiple specialist service streams; and rationalise duplication. The scale and organisation-wide impact of these workforce and resource decisions require Advanced capability rather than Adept.
When reviewing the capability comparison table available on the intranet (Capability-comparison-table and included below) and notwithstanding the mercer evaluation affect, the proposed change of capabilities uplifts the role grade from 11/12 to Band 1.					

Capability comparison table

Applies to roles covered by the *Crown Employees (Administrative and Clerical Officers - Salaries) Award 2007* and the Public Sector Senior Executive Bands. May also be used as a starting point in deciding capability levels and focus capabilities that apply to roles covered by other Awards or job classifications.

GRADE / BAND	FOUNDATIONAL	INTERMEDIATE	ADEPT	ADVANCED	HIGHLY ADVANCED	FOCUS CAPABILITIES
Band 4	0	0	0	4-6	14-16	8-10
Band 3	0	0	0-3	9-14	6-10	8-10
Band 2	0	0	1-5	10-15	3-6	8-10
Band 1	0	0-2	5-12	4-11	0-3	8-10
Clerk Grade 11/12	0	2-6	8-14	1-6	0-1	6-9
Clerk Grade 9/10	0	5-11	5-10	0-2	0	5-9
Clerk Grade 7/8	2-6	8-14	1-7	0	0	5-8
Clerk Grade 5/6	5-11	6-14	0-2	0	0	4-7
Clerk Grade 3/4	7-11	5-11	0	0	0	4-6
Clerk Grade 1/2	12-16	0-4	0	0	0	3-4
General Scale	12-16	0-4	0	0	0	3-4

Notes

1. General Scale and Clerk Grade 1/2 - a minimum of 3 focus capabilities only applies to roles that do not have a focus capability from the Business Enablers group
2. Clerk Grade 3/4 and 5/6 – a minimum of 4 focus capabilities only applies to roles that do not manage people. Where the role manages people, a minimum of 5 focus capabilities apply
3. As per the Role Description Development Guidelines, the spread of capability levels selected for a role should not generally exceed 3 consecutive levels
4. Band 1 roles are diverse. Some may have capabilities in the Intermediate to Advanced level range, while the spread for others may be Adept to Highly Advanced
5. Contact CapabilityFramework.psc.nsw.gov.au for advice on how to develop a new Guide for another Award if required.

Feedback 11

Hi <redacted> and <redacted>,

The Communications team has submitted collectively feedback on the proposed structure, which I support. The feedback below is additional. Thanks for your consideration in advance.

1. Channel and Engagement Lead position

- I have been operating and performing above requirements and expectations in this role for 16months. Please consider moving this role to Stage 2-Suitability Assessment (EOI) given my performance and capabilities.

	▪ The RD for this role does not reflect the actual responsibilities and skill expectations required to fulfil this role. ▪ Attached I have provided marked-up amendment to the Role Description. This includes a table outlining the proposed Focus and Complementary Capabilities, the current capability levels, the levels I believe more accurately reflect the role, and the rationale for each proposed increase. These changes support a higher grading assessment reflecting the role’s scope and complexity. ▪ The strategic requirements of this role have not been included. This role is primarily responsible for “development, implementation and evaluation of channel strategies across digital and engagement platforms, ensuring communications are informed by audience research, client insights and channel performance data, and aligned with organisational priorities and business objectives.” 2. CEE leadership I am deeply concerned that <redacted> has not been appointed to lead the CEE team. At a time of significant change, her leadership, organisational knowledge and ability to navigate complex priorities make her uniquely placed to lead a merger of this scale. Losing this experience increases the risk of disruption, reduced efficiency and additional pressure on staff already managing competing demands. Beyond her technical expertise, she is a respected and supportive leader who has fostered a positive team culture, strong morale and high levels of engagement. The team's performance and motivation are a reflection of her leadership. Removing her from the organisation risks undermining staff confidence, reducing productivity and increasing retention risks at a time when stability and trusted leadership are most needed. I strongly believe the organisation would benefit from retaining her leadership, expertise and deep institutional knowledge, especially during this period of transition. 3. Intranet With the removal of the Intranet Coordinator position, the responsibilities of the CEE team will need to be reviewed to manage reduced capacity – below is my suggestion. ▪ CEE will be responsible for managing the content on the intranet homepage, including structure and menus ensuring that it is optimised for accessibility, user experience and currency. ▪ Practice areas and divisions are responsible for the maintenance of content on their pages (as is the current process)
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	▪ Organisational intranet support will become very limited. Support will need to be managed through ICT and self-service SharePoint training. To manage this limited capacity, I strongly support the proposal submitted by <redacted> to extend her employment for a few months to complete the Intranet Review Project which will provide an accurate, current, clear baseline for the future. This project's importance is heightened with the removal of this position. It will allow for additional intranet training and the opportunity to get content owners comfortable and being more self-sufficient with editing which is important when there is no longer a dedicated specialist for staff to turn to for assistance. 4. Creative design roles (Graphic Designer + Social & Multimedia Specialist) These two creative designs roles are very similar, just using different methods to design. They should be in the same team and at the same grade. The most appropriate team for them to be in is the Channel and Engagement team given that they will be designing materials specific to channel (social, pubs, YouTube etc). Locating them within this team would provide direct access to channel and audience insights, enabling more effective, data-informed creative outputs and stronger engagement outcomes. Please ensure this feedback is included as part of the consultation period. I could not use the feedback form because it did not allow for attachments. Many Thanks <redacted> In the document below, I have marked up key amendments to the Channels and Engagement Lead Role Description to accurately reflect the current scope, responsibilities and strategic contribution of the position as it is presently operating. I have also included a table outlining the proposed Focus and Complementary Capabilities, the current capability levels, the levels I believe more accurately reflect the role, and the rationale for each proposed increase. These changes support a higher grading assessment reflecting the role's scope and complexity. My intention is to demonstrate the significant evolution of the role and the level at which it is currently being performed. Given the breadth of responsibilities, strategic capability and complexity of work, I hope the organisation will consider formally recognising this through the regrading of the Channel and Engagement Lead position to a Grade 11/12.
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<redacted>

NOTE: Unfortunately, the track changes to the Role Description were unable to be replicated in this submission.

Role Description - Channels and Engagement Lead

Primary purpose of the role

The Channels and Engagement Lead leads Legal Aid NSW's channels, publishing and audience engagement and channel strategies and implementation to improve how people find, access and engage with legal information and support. The role leads multi-channel campaign activity, publishing, audience engagement and channel performance, using audience insight, analytics and contemporary digital practice to raise awareness and educate the community on legal issues, improve performance across our channels, accessibility and user experience. The role leads the specialist team responsible for website, social, multimedia, intranet and publishing activity.

Key accountabilities

- Lead the development, implementation and evaluation of channel strategies across digital and engagement platforms, ensuring communications are informed by audience research, client insights and channel performance data, and aligned with organisational priorities and business objectives.
- Operationalise channel strategies through the management of website, social media and other digital channels, ensuring content, publishing and engagement activities are coordinated, audience-focused and aligned with Content, Education & Engagement priorities.
- Lead the effective operation and performance of Legal Aid NSW-owned channels and multi-channel publishing activities, ensuring information is published accurately, accessibly, consistently and at the right time for intended audiences.
- Lead audience engagement and channel-based communications activity, including campaigns, social and multimedia engagement, to extend reach and connect people with relevant legal information, education and pathways to support.
- Drive continuous improvement of channel performance using analytics, SEO, audience feedback, user behaviour and performance measures to improve discoverability, user experience, engagement and the effectiveness of digital pathways.

	• Lead publishing and distribution planning, working with the Content Lead, CLE Lead, Events Manager and Senior Partners CEE to sequence activity, confirm content readiness and legal assurance, and adapt approved material for effective delivery across channels. • Establish and maintain channel standards and publishing practices covering accessibility, moderation, quality, records, privacy, cyber security and brand requirements, and ensure sensitive or high-risk matters are identified and escalated appropriately. • Lead, develop and manage the Channels and Engagement team, setting clear priorities and performance expectations, allocating work according to capability and demand, and building contemporary digital, publishing and engagement capability. • Manage specialist suppliers and digital service relationships within delegated authority and contribute advice on channel investment, publishing resources and campaign expenditure to support effective use of Content, Education & Engagement resources. Key challenges • Balancing high-volume and time-critical campaign, publishing and engagement needs with planned channel improvements and limited capacity, while maintaining accessibility, quality, legal assurance and consistency across channels. • Moving from reactive and fragmented publishing to coordinated, evidence-based channel management where content, legal expertise, technology platforms and organisational priorities are owned across different functions. • Maintaining audience reach and trust as channel behaviours, digital technologies and audience expectations change, while meeting the needs of diverse communities and managing accessibility, privacy and reputational risks. Focus Capabilities and Complementary Capabilities regrade proposal
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	Focus capabilities				
	Capability group / sets	Capability name	Proposed level	Appropriate level	Rationale for change
	Personal Attributes	Display resilience and courage	Adept	NA	NA
	Relationships	Communicate effectively	Advanced	Highly advanced	Senior roles within the Communications require the highest level of this capability. Specialised responsibilities include: • Leads complex strategic programs that support organisational objectives, proactively identifying and responding to audience needs and emerging issues and changes. • Develops and delivers complex communications that translate complicated legal concepts into clear, accessible content, tailored to various audiences and channels while adhering to accessibility standards and plain language principles • Communicates with clarity, confidence, and the ability to influence outcomes • Enhances the organisation's digital presence by delivering trusted and engaging content that reinforces brand credibility and reputation.

	Relationships	Commit to customer service	Adept	NA	NA
	Relationships	Influence and negotiate	Adept	NA	NA
	Results	Deliver results	Adept	Advanced	Specialised responsibilities include: • Leverage legal, audience and channel research and accessibility expertise to deliver communications that increased awareness of legal services among our priority audiences • Sets clear expectations / success measure, priorities and performance standards and reporting. Imbed a culture of continuous improvement. • Uses digital analytics and audience insights to track performance against objectives and improve digital performance. • Identifies new approaches that improve efficiency, effectiveness or audience engagement.
	Results	Plan and prioritise	Adept	Advanced	Specialised responsibilities include: • Prioritises digital campaigns and content initiatives that support Legal Aid's strategic priorities, while managing emerging issues and competing stakeholder requests

					• Lead the development of the annual plan establishing effective governance, channel priorities, audience goals, content themes and performance measures. • Reprioritises digital content and campaign activity to support emerging trends, changes and updates to ensure the community receives timely and accurate information. • Aligns website improvements, internal communications and social media activity to support organisational initiatives and digital enhancements. • Monitor performance adjusting as needed, using audience insights and channel analytics to refine content priorities and optimise investment across social, web and email channels.
	Business Enablers	Technology	Adept	NA	NA
	People management	Manage and Develop People	Adept	Advanced	This role has 4 direct reports and the below requirements: • As a new team, refinements of roles and responsibilities will be required over time to achieve effective business outcomes • Manage and develop the requirements of the team while building capabilities, encouraging professional development and succession planning.

					- Implement performance and development frameworks that build digital communication, content, engagement and analytics capabilities, ensuring the team can meet current priorities and adapt to emerging digital trends and technologies. - Set an example to others and encourage teams to build an organisational culture of care, belonging and trust
	People management	Inspire Direction and Purpose	Adept	NA	NA
	Complementary capabilities				
	Personal attributes	Act with integrity	Intermediate	Adept	When managing a larger team, the importance of ethical, professional and values driven behaviour is heightened. Specialised responsibilities include: - Model professional, ethical behaviour and encourage the same from the team - Identify and resolve ethical issues within the workplace but also on our public facing channels. - Prevent and report inappropriate behaviour including maintaining our social media community guidelines
	Personal attributes	Manage self	Intermediate	NA	NA

	Personal attributes	Value Diversity and Inclusion	Intermediate	NA	NA
	Relationships	Work Collaboratively	Adept	NA	NA
	Results	Think and Solve problems	Adept	Advanced	Specialised responsibilities include: • Uses audience insights, channel analytics results and stakeholder feedback to identify issues and opportunities • Makes evidence-based recommendations that balance business, customer and channel needs • Works with subject matter experts, designers and stakeholders to resolve complex communication challenges • Balances competing priorities to determine the most effective solution. • Identifies opportunities to improve content production, workflows and channel management • Develops frameworks, standards and governance processes for digital content and engagement • Uses research, analytics and best practice to inform decision-making
	Results	Demonstrate Accountability	Intermediate	Adept	Key responsibilities include:

					- Evaluates digital campaign performance against agreed objectives and uses insights to refine future content, channel and engagement strategies. - Maintain team focus on outcomes rather than activity ensuring all activities contribute to measurable business outcomes. - Manages competing priorities and resourcing demands to maintain team wellbeing while ensuring critical digital communication outcomes are delivered - Identify and manages risks associated with digital campaigns, social media activity and emerging issues to protect organisational reputation and ensure successful delivery. - Ensures audience data, website analytics and digital engagement activities are managed responsibly, with appropriate consideration of privacy, accessibility, ethics and security obligations.
	Business Enables	Finance	Intermediate	NA	NA
	Business Enables	Procurement and Contract management	Intermediate	NA	NA
	Business Enables	Project management	Intermediate	Advanced	Specialised responsibilities include: Develops communication project scopes, business cases and delivery plans for digital initiatives,

					campaigns and platform enhancements ensuring projects are aligned with organisational priorities and audience needs. • Works closely with divisions and specialists to develop digital communication projects and channel strategies that are accurate, accessible and effective for target audiences. • Leads stakeholder engagement for a major communication digital channel initiative, providing clear reporting, consultation and change throughout planning, implementation and evaluation. • Evaluates digital campaigns and channel projects against agreed performance measures, using findings to improve future planning, audience engagement and resource allocation. • Participates in working groups to provide strategic advice on digital channels, stakeholder engagement, content delivery and organisational communications projects.
	People management	Optimise business outcomes	Intermediate	Advanced	Specialised responsibilities include: • Build and maintain the capability of the digital communications function by identifying current and future skill requirements, ensuring the team can deliver organisational priorities and adapt to emerging technologies, audience expectations and digital trends

					• Foster an inclusive and diverse digital communications team that brings varied perspectives, experiences and insights to improve audience engagement and communication outcomes. • Promote innovation and continuous improvement by encouraging the exploration of new technologies that enhance audience outcomes and organisational effectiveness. • Establish and continuously improve output by streamlining workflows and approval pathways, implementing consistent performance reporting, and strengthening accessibility and content governance practices to improve performance • Fosters a culture of learning and continuous improvement by conducting campaign reviews and post-implementation evaluations, encouraging experimentation and constructive feedback, and sharing insights, successes and lessons learned to continuously enhance digital communication and engagement outcomes.
	People management	Manage reform and change	Intermediate	NA	NA

Feedback 12

Collective Feedback

Feedback on proposed Content, Education & Engagement structure

Executive summary

The proposed Content, Education & Engagement structure significantly reduces staffing while retaining a broad and complex service remit, without sufficient demand or capacity modelling to show that workloads will be sustainable.

Key concerns include:

- inadequate resourcing across administration, copywriting, legal review, design and channel management;
- over-reliance on a small number of specialists;
- unclear role scope and under grading of roles; and
- the lack of dedicated strategic communications, intranet and content strategy capability.

Governance, approval pathways, decision rights and ownership across Business Partners, Content, Events and Legal Review are not clearly defined. Together, these gaps create a high risk of bottlenecks, delays, inconsistent quality, staff burnout, loss of specialist knowledge and reduced service delivery.

The structure should be reviewed before implementation, supported by capacity modelling, clearer governance and role accountabilities, appropriate resourcing and classification, defined service standards, and a plan to retain specialist expertise and strategic communications leadership.

1. Workload and resourcing

Concern	Risk	Recommendation
The proposed structure reduces staffing by 11 FTE while maintaining responsibility for content creation, community legal education, digital channels, social media, intranet management, engagement, events and stakeholder support.	There is a risk that the volume of work will remain unchanged while being distributed across a significantly smaller workforce, leading to workload pressures, delays in delivery, reduced responsiveness and staff burnout.	Review team structure and consider adding additional staff in each stream to assist with workload. Undertake demand, workload and capacity modelling to demonstrate that the proposed structure can sustainably meet organisational needs.

Workforce demand or capacity modelling has not been provided to demonstrate that the new structure can deliver existing services	Critical functions will become under-resourced, resulting in delays, reduced quality, increased workload pressured, delays in delivery, unmet stakeholder expectations and reduced responsiveness and staff burnout.	
The volume of work for the 3/4 Administration Officer, reporting directly to the Principal Manager is too much for one person. • Finance and invoice management • procurement • events assistance • publication distribution including inbox monitoring • stock management • administration across the entire CEE team	The role description already contains a wide range of responsibilities. If additional duties emerge after implementation, a single Grade 3/4 would become overwhelmed.	Provide a detailed assessment of which activities will cease, reduce, be automated or be prioritised differently to ensure workloads remain sustainable. This work should be divided across 2 FTE.
Two copywriters are introduced to produce content for the entire organisation and replace five LRT resources. One of these copywriters is a 5/6, despite previous advice that a minimum of two 7/8 roles would be required for this volume of work. The distinction between the 7/8 and the 5/6 role is currently minimal. Both positions are responsible for the same content	The copywriters will need to do the work of the LRT team as well as write content for socials, other website, LAN, PLN etc. There is an enormous amount of work for two resources.	Three 7/8 copywriters are ideally required for this volume of work. This would still be a substantial reduction and budgetary saving from the current structure, which employs: • 5 legal professionals in LRT, and • A 5/6 or 7/8 copywriter in the Communications Team.

development activities, including drafting, editing, stakeholder engagement, plain English translation, content optimisation and content improvement. This could easily create a difficult working environment if two similarly experienced professionals are performing similar work. To handle this volume of work, it would not be appropriate to hire a very junior copywriter to perform the work of the 5/6.		At a minimum, the 5/6 copywriter role should be upgraded to a 7/8 or the total allocation of roles should be increased to include two 5/6s and a 7/8. We need more copywriter roles, and assurance that budget will be available for additional freelance capacity where required.
Workload increases are skill expectations are not reflected in remuneration/grading. In some cases, such as the graphic designer role, roles have been under-graded for years. This review has done nothing to address this and, in some cases, has adjusted role descriptions to remove capabilities that are essential to performing these roles to keep them at a lower grade.	Not updating the RDs appropriately, and failing to ensure that the focus capabilities of roles reflect the standard/level of professional required to fill them devalues and demotivates the team. This is especially true where role grading across the team is not even. For example, the graphic designer role should be a 7/8 as this is the standard set for a specialist role operating independently across the team. Lawyer roles are also consistently paid more than comparable roles filled by non-lawyers. For example, the Legal Officer IVs will outearn all the 9/10 roles. The 9/10 Content and Channel positions manage multiple people and should be responsible for important communications strategy functions.	Review the RDs in detail with people that know the roles well. Grade the roles appropriately, including reviewing the grades across government agencies to ensure consistency. Pay people what they are worth.

2. Reduction in strategic communications capacity

Concern	Risk	Recommendation
Despite supporting a restructure that is proposed to change the way we produce and share content, the proposed structure appears heavily focused on reactive and administrative tasks, such as publishing, scheduling, maintaining channels and coordinating approved content. The Channels & Engagement function has four operational roles supporting: • website • social media • intranet • Swift/internal communications • digital publishing • engagement • campaign delivery, and • analytics and optimisation. • The content team has four operational roles supporting: • website content	There appears to be limited capacity for strategic communications planning, communications advice, issues management and stakeholder engagement. This may reduce the organisation's ability to proactively manage communications opportunities and risks. Without clear ownership of content strategy, the Channels and Content teams may become primarily focused on content production and maintenance rather than proactively identifying content gaps, audience needs and opportunities for improvement. This could result in a more reactive approach to content development, with limited focus on long-term planning, prioritisation and strategic content outcomes. We could fall back into the same reactive model that we have worked hard as a team to move away from as a result of feedback from our users. Strategy planning for crisis communications, media management and executive advice has also not been considered and may become fragmented or deprioritised.	Clarify where responsibility for strategic communications advice and planning will sit within the proposed model and reflected it the role descriptions and governance arrangements. The CEE strategy can be developed by the 11/12 Manager, however the Channel strategy and Content strategy should sit with the respective 9/10 leads. Strategy is currently not included in these roles. They need to be recognised as strategic and influential leaders in these spaces in the same way as the 9/10 in charge of the CLE branch of the team. A single 11/12 role will not be able to set these strategies while managing such a large team and performing their other functions. Strategy is strongest when it's shared, with different levels of responsibility. The scope of all 7/8 roles should be broadened to include responsibilities for strategy appropriate to their expertise. This would help ensure strategic thinking is embedded across the team. For example, copywriter roles should be expected to contribute to content strategy through identifying audience needs, content gaps, emerging issues, opportunities for improvement, and implementing recommendations informed by stakeholder engagement and content performance insights.

• social media content strategy and content • newsletter content strategy and content • publications strategy and content • content for our educational resources • overarching content strategy • campaign content, and • ad-hoc advice and training. • Role descriptions do not include specific references to strategy. It is unclear who will produce and edit content for the intranet and our annual report. Content strategy does not explicitly sit with any of the proposed roles. While the Content Lead is responsible for content planning, lifecycle management and team leadership, and the copywriting roles are focused on content creation and quality assurance, there is no explicit reference to developing content strategy, identifying content opportunities, understanding audience needs, or shaping future content priorities. • Similarly, there is no Communications Strategy function that is designed to		
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consider how important messages are rolled out across our channels, and work alongside project teams to share crucial updates in and outside of the organisation. The Channels Team is not resourced to do this work or the similarly important strategic work of technical and other optimisation of our channels.		
The proposed structure removes the dedicated Intranet specialist role and does not identify who will take on these responsibilities beyond uploading content.	Without clear governance and identified roles and responsibilities around intranet management, this will lead to increased risk of duplication, inconsistent approaches including accessibility requirements and fragmented and conflicting information. This will affect staff confidence in the intranet as a reliable source of information.	Establish clear responsibilities and ensure they are reflected in role descriptions. Reconsider importance of dedicated Intranet specialist.
There is no clear ownership of organisational communications channels such as the intranet, publications and audience engagement functions following the removal of dedicated specialist roles. For the intranet specifically there is responsibility in the BP roles and also the Channels Comms Officer role (designated pages of the intranet). There isn't clarity around who owns what pages.	Channel management may become fragmented, leading to reduced quality, delays and inconsistent user experience.	Clearly allocate channel ownership responsibilities and ensure these responsibilities are reflected in role descriptions and governance arrangements.
The governance, approval and decision-making framework between Business	Unclear authority may result in duplicated approvals, conflicting feedback, multiple review rounds, delays, rework, stakeholder dissatisfaction and confusion about who is	Develop a comprehensive governance and approval framework that clearly defines decision rights, approval authority, accountability, prioritisation, legal review requirements, publication authority, escalation pathways

Partners, Content Teams, Events and Legal Review is not clearly defined.	ultimately responsible for decisions and outcomes. This may undermine the intended efficiencies of the restructure.	and channel governance across Business Partner, Content and Legal Review functions.
The Principal Manager, Content, Education & Engagement role reads more as a manager of content services than a strategic leader of content and communications practice. While there is a strong focus on governance, prioritisation and service delivery, there is less emphasis on setting the strategic direction for content, communications and audience engagement across Legal Aid NSW. Given the breadth of teams reporting to this role, stronger accountability for leading content and communications practice is needed.	The function and team as a whole could become primarily operational and demand-driven, with a focus on managing workflows and priorities rather than driving a long-term strategic vision for content, communications and audience outcomes. We want to avoid a situation where there is no content strategy ownership in the whole team and a leader who is delivery focused instead of focusing on what's best for the audience. We've tried hard to move towards a more strategic model of communications in response to user research and don't want to see this good work undone.	Strengthen the role's accountability for content and communications leadership by explicitly including responsibility for setting strategic direction, audience priorities and a unified vision across all Content, Education & Engagement streams. This needs to be a strong, strategic, content-focused leadership role. With the right content strategy and direction established from the top down, decisions around priorities, workflow, investment and delivery should naturally flow across the Content, Education & Engagement function.
The name of the team should be reconsidered. Even though Content, Education and Engagement is what the team will be doing it makes it complicated and unrelatable to stakeholders. It is also not aligned to other agencies and therefore cause confusion.	Causes confusion of internal and external stakeholders.	The team name should be simpler and all inclusive. An alternative name could be Communications and Engagement team, as communications incorporates content and education.

3. Reliance on a small number of specialists

Concern	Risk	Recommendation
The proposed Channels and Engagement function consists of a Lead and a small (insufficient) number of specialist operational roles. The proposed model has: • Potentially an external 11/12 manager • only 2 Senior Partners CEE (Legal Officer IV) • 2 CLE Officers	The structure appears highly dependent on a small number of individuals with specialist legal knowledge. Leave, turnover, vacancies and the high volume of work could significantly impact service delivery. This is especially crucial during a period where roles aren't being backfilled or immediately replaced.	Consider how business continuity, coverage arrangements and succession planning will operate within the proposed model. The business partner roles should have primary responsibility for reviewing legal information, and there should be one role for each practice area. Business partner roles need to have capacity to review content and proactively identify when legal information (on the website and publications) needs to be updated.
There isn't clear ownership for ensuring content is legally factually correct. Currently, we rely on LRT to provide factual reviews of content with a 4-week turnaround. The proposed structure appears to depend on just two Senior Partners CEE for this review.	The increased volume of content requiring legal review, combined with a reduction in dedicated legal review resources, will create significant workflow bottlenecks. Delays in obtaining legal input and approvals could affect the team's ability to publish new content, update existing resources and respond to changes in legislation, policy and service delivery in a timely manner.	• Review the proposed legal review and approval model to ensure it is appropriately resourced for the anticipated volume of content. • Ensure we have a content approval workflow model that ensures timely delivery of content.

4. Role scope and classification concerns

Concern	Risk	Recommendation
There are a number of roles that have increased responsibilities but are graded the same as the current structure.	There may be a mismatch between the complexity and breadth of responsibilities and the classification level. This could impact recruitment, retention and employee satisfaction.	Review whether the responsibilities and expectations of the role align with the proposed grade and classification. Could some roles be re graded?
Graphic designer role scope includes all graphic design work without accounting for the design triage model which was put in place due to resourcing constraints. For instance, the design triage model indicates that all digital designs are outsourced, whereas the proposed graphic designer RD indicates the in-house role will perform this work.	Too much graphic design work expected from one resource pushing out timelines and possible impact on wellbeing. Deviating from the design triage model means that the strategic and important work may not prioritised and kept in-house.	Review the RD and reduce the scope of work. Continue using the design triage model. Outline that the role will need to engage with external designers to help with workload. Ensure there is budget to match.
The Senior Partner model is central to the future structure but key responsibilities, authority levels and decision-making powers remain unclear.	Different parts of the organisation may interpret the role differently, resulting in inconsistent advice, unclear accountability and stakeholder frustration.	Develop a detailed Senior Partner operating framework outlining authority, responsibilities, service expectations and success measures.
Governance arrangements for content, publications, website, intranet and stakeholder communications are not clearly documented.	Inconsistent standards, duplication of effort and confusion about ownership and decision-making authority.	Develop a documented governance framework covering approvals, ownership, quality assurance and content lifecycle management.
The role descriptions focus heavily on technical responsibilities and contain limited emphasis on future-state behaviours and enterprise-wide collaboration.	Staff may continue operating in functional silos rather than delivering the integrated services envisioned by the restructure.	Strengthen role descriptions to include collaboration, stakeholder partnership, strategic planning and cross-functional delivery expectations.

Role descriptions do not clearly articulate responsibility for accessibility, inclusion, user-centred design and audience insights	These critical organisational requirements may become inconsistent or overlooked.	Incorporate explicit accountability for accessibility, inclusion and user-centred service design into all relevant roles.
Several role descriptions do not adequately define measurable outcomes, success indicators or performance expectations.	Staff may be unclear about priorities and leaders may struggle to assess effectiveness of the new model.	Include clear performance expectations, deliverables and success measures in each role description.
The 'Communication Officer-Channels' position included a key accountability as "maintaining designated corporate and shared intranet content.... by coordinating updates with content owners, identifying outdated information and ensuring published material remains accurate and current" This responsibility is <u>not</u> currently part of the existing Intranet Coordinator position, which has been removed (content owners are responsibility for maintaining and updating their own content).	This responsibility is too much to be absorbed into a role. If this level of intranet support is required, the Intranet Coordinator role should not be removed,	Option 1 – Remove responsibility from the Communication Officer position and let the organisation update content as needed Option 2 – Reinstate Intranet coordinator position.
The principal manager CEE scope of work is wide and varied and should be reconsidered to be a higher graded role like at a Director level.	If the role is not graded accurately then the right level of skill, experience and talent will not be attracted which could jeopardise the perceived benefits of merging all the teams as staff may continue doing what they know best and not successfully transition to the new way of doing things.	Regrade the Head of the CEE team to a Director level to attract the right person.

5. Impact on service delivery

Concern	Risk	Recommendation
The consultation materials do not clearly identify how service levels, turnaround times or outputs may change under the proposed structure.	There may be an expectation that the same level of output and service delivery can be maintained despite reduced staffing levels.	Provide clear performance assumptions and expected service standards under the new operating model.
Specialist expertise in communications, legal review, education, intranet and engagement is substantially reduced or removed, with limited explanation of how those functions will be maintained	Loss of institutional knowledge, specialist skills and long-standing stakeholder relationships may reduce service quality and increase operational risk.	Develop a knowledge retention and transition plan and clearly articulate how specialist expertise will be maintained in the future model.
The current Communications Manager has not been directly appointed into the Principal Manager Content Education and Engagement even though she has been operating at 11/12 grade for 8.5 years and Communication focused roles equate to more than 80% of the proposed CEE team.	The current Communications Manager has successfully lead Communication team over the past 8.5 years. She has significant industry specific knowledge and strong, collaborative relationships across the organisation. The loss of this leader will significantly impact the efficiency of the team. Someone with her leadership skills and specialist communication and Legal Aid NSW knowledge, would be best place to lead a merge of this scale. A new manager, with less knowledge will struggle managing the competing priorities across the team which will increase the risk of staff burn-out and result in significantly lower outputs. Under her leadership the output and motivation of the Communication team is	Directly appoint the Communication Manager to the Principal Manager Content Education and Engagement position.

	high. She is a well-respected leader. Removing her from the team risks lowering morale and therefore productivity. Retention risks also increase.	
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Feedback on Proposed CEE restructure

Executive summary

- The Legal Resource Team (LRT) has concerns about the proposal to remove the Lawyer I-III positions and the proposed replacement with two senior copywriter and copywriter positions, rather than an integration of lawyers within the proposed CEE restructure.
- The proposal grossly underestimates the LRT's current work, as well the legal expertise required to maintain and create resources for Legal Aid NSW. This often requires reading and interpreting legislation and other instruments, and recognising if there is a gap in information, or whether current information needs updating. The LRT lawyers use their discretion and expertise to draw the line with what is considered legal information as opposed to legal advice, as well as giving any relevant warnings within content. This helps the organisation mitigate legal risk.
- All LRT lawyers are practising solicitors who regularly advise clients. Their ongoing legal practice and direct client engagement strengthen the LRT's understanding of client needs, ensuring that legal content is developed and maintained in a way that is practical, accurate, and client focused.
- A comparison of the job descriptions between the lawyers and senior copywriter and copywriter highlights that the lawyers, even though it is not a part of the current job description, already do all of the functions of the new proposed roles.
- The proposal does not consider how legal functions of the LRT's work will continue under the proposed structure. These functions are essential for the ongoing maintenance of the legal content.
- The proposal does not address any flow on implications of the removal of the LRT lawyers- including the pressure it may place on other departments within Legal Aid to review content. As it currently stands, the LRT is a standalone functioning team with very limited reliance on other practice divisions within the organisation.
- As seen by the current cuts to the SWAT civil, there will be an increase in demand for legal information, as many of these matters will be referred to LawAccess NSW for information or referral. There will be a need for legal content to be created, published and maintained. We also have a relationship with LawAccess whereby they request information for any areas of law where there are gaps in clients obtaining legal advice and where there is no other legal information available.

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Concerns About the Rationale for the Proposal

The proposal states:

"The way Legal Aid NSW determines, generates and manages legal information content has not substantially changed for many years and remains primarily organised around internal structure, demands and historical models rather than user and client needs."

This statement does not accurately reflect the work currently undertaken by the Legal Resource Team (LRT).

LRT develops and maintains legal information resources in direct response to client and user needs. These needs are identified through multiple sources, including:

- Data collected and analysed through LRT planning processes.
- Feedback and enquiries received through LawAccess NSW.
- Insights gained from LRT solicitors providing direct legal advice.
- Suggestions from SWAT staff.
- Requests from other areas of Legal Aid NSW.
- Website user feedback, including the thumbs up/thumbs down functionality.
- Emerging legal trends and issues affecting the community.

LRT has demonstrated a strong capacity to respond quickly to changing community needs. Recent examples include resources on:

- **Artificial Intelligence (AI):** New content has been created and published in response to the increased use of AI. For examples, see [AI and employment law](#) and [Using generative AI in the legal system](#). Separately, a comprehensive review and update of all relevant court forms was undertaken in response to the release of practice notes by various courts and tribunals restricting the use of artificial intelligence in the preparation of court documents. For an example, see [Forms - Wills and estates](#).
- **E-bikes:** Information has been updated to reflect new laws, for more information, see [E-bikes, e-scooters and e-skateboards](#).
- **Character references:** Legislation has been reviewed, and resources will be removed once the bill has been proclaimed.

It is also important to acknowledge that some existing website issues identified in the proposal were not decisions made by LRT. For example, the structure and naming of some website topics were determined outside LRT. LRT has nonetheless been actively working to improve these issues and enhance user experience.

Accordingly, the suggestion that legal information development has not been client-focused does not accurately reflect the work performed by LRT.

Operational and Service Delivery Impacts

Increased Reliance on Legal Information Resources

The proposed removal of legal advice pathways is likely to result in:

- More clients being directed to LawAccess NSW for help.
- Increased call volumes.
- Longer call times.
- Greater reliance on digital legal information resources.

As self-help and digital pathways become increasingly important, the quality, accuracy and currency of legal information become even more critical.

The Advisory Committee Report noted a significant increase in clients locating Legal Aid services through AI tools. This highlights the growing importance of publicly available online legal information.

However:

- AI tools are only as reliable as the information they access.
- There is significant misinformation, and poor-quality legal information, available online.
- Legal Aid NSW resources provide a trusted source of accurate, current legal information for both the public and emerging technologies.

LRT resources help clients understand their legal problems and make informed decisions. They also support early resolution of issues and reduce the burden on courts and tribunals by assisting self-represented litigants to navigate legal processes more effectively.

While the impact of these resources may be difficult to quantify, it is likely to be substantial.

Cuts to Legal Aid NSW services

As seen in the SWAT restructure, civil law services have been cut and it is proposed that the shortfall will be covered mostly by referral to LawAccess NSW who rely heavily on the resources prepared and maintained by the LRT.

Impact on LawAccess NSW

LRT and LawAccess NSW have developed a highly effective working relationship over many years.

LawAccess provides LRT with:

- Direct customer feedback.
- Information about recurring client issues.
- Information about gaps in existing resources.
- Feedback on whether resources are meeting customer needs.

This feedback is:

- High quality.
- Continuous.
- Obtained at no additional cost.

It plays a critical role in maintaining and improving legal information resources in response to user needs.

The proposal does not clearly explain how this valuable feedback loop will be preserved under the proposed model. Losing this relationship risks reducing the quality, responsiveness and relevance of Legal Aid's legal information.

There are also broader questions about how LawAccess service delivery will be affected if legal information resources are updated less frequently or become less accurate.

Potential consequences include:

- Increased demand for legal advice appointments.
- Longer wait times for customers.
- More referrals for matters that could otherwise be resolved through effective self-help resources.
- Increased legal risk arising from reliance on outdated information.

Ongoing Maintenance of Legal Content

A key concern is how Legal Aid's existing legal content will be maintained under the proposed structure.

This includes:

- Approximately 592 pages of MPIA content.
- Approximately 138 pages of LawPrompt content.
- Approximately 498 forms, precedents, templates and sample documents.

The proposal appears to suggest that responsibility for maintaining this content will rest primarily with:

- Two Copywriters; and
- One Content Lead.

If this understanding is correct, there is insufficient detail about how these positions will:

- Monitor legislative change.
- Identify legal developments.
- Interpret complex legislation.
- Undertake legal review.
- Maintain existing content while also fulfilling their broader content-design responsibilities.

Example: There are often changes to legislation which may cause non-apparent changes to content. Recently, the first proposed changes to the character reference amendments. This required a review of a suite of documents which needed to be updated, and not in a uniform way, for relevant criminal charges.

The proposal also indicates that additional support will be provided by the practice divisions. It has already been acknowledged that the practice divisions do not have the capacity to perform this work. This is not a new issue arising from the current budget constraints. Both LRT and Communications have sought input from the practice divisions on major projects, with limited success due to competing operational priorities and lack of capacity.

It should also be noted that developing and reviewing legal information resources is not a core requirement of solicitors in the practice divisions. And it remains unclear how the proposed model would be adequately resourced, in the current funding environment, without creating delays, increasing workloads, or diverting resources from core legal service delivery.

The proposal should clearly explain:

- Who will be responsible for legal review.
- Who will be responsible for identifying and implementing legal updates.
- What quality assurance processes will apply.
- Whether content will continue to be maintained at the current level of accuracy and frequency.

If content is not intended to be maintained to the same standard, the proposal should identify:

- The risks associated with that approach.
- The impact on LawAccess NSW.
- The impact on courts, tribunals and stakeholders who rely on Legal Aid resources.
- The impact on members of the public seeking accurate legal information.

Importance of Legal Expertise

The work undertaken by LRT is highly specialised.

Maintaining legal information resources requires more than content-writing skills. It requires the ability to:

- Interpret legislation.
- Understand complex legal frameworks.
- Evaluate legal changes.
- Assess interactions between legislation, regulations, policies and case law.
- Translate complex legal concepts into accurate and accessible language.

This work is particularly important in areas such as:

- Court and tribunal processes.

- Form-filling guidance.
- Sample documents and precedents.
- Step-by-step legal pathways.

These tasks require legal knowledge and experience beyond that ordinarily expected of copywriters.

As part of LRT's processes, the majority of the work is created, maintained and published without the input of the practice divisions, meaning that the work is turned around quickly. There is minimal reliance on external stakeholders to review content produced by the LRT. Any input that is received, is in addition to the work already done by the LRT, not in place of it.

Under the current model, LRT lawyers can identify legal change, analyse its implications, draft content, review content and publish updates within one team. The proposed model appears to require legal input from practice divisions, content drafting by copywriters and subsequent legal review, introducing additional handover points and dependencies. The proposal does not explain how this process will improve efficiency, reduce turnaround times or maintain the current level of responsiveness to legal change.

In the proposed restructure and job description, it is apparent that there would be more collaboration between business partners and other practice divisions to do with legal content. It would be expected that there would be delays and some resistance from practice divisions (as in the past) to be able to review any content due to their current workload.

For this reason, we consider it prudent that legal content continue to be:

- Drafted by legally qualified staff; and
- Subject to legal review and oversight by a senior lawyer.

A model where legal content is primarily developed and maintained by non-lawyers may increase the risk of inaccuracies. It will also complicate and lengthen the process, by increasing the number of steps and people involved, thereby reducing Legal Aid's capacity to respond quickly to legal change.

Impact on Stakeholders

Legal Aid's legal information resources are relied upon by a wide range of stakeholders, including:

- LawAccess NSW
- Revenue NSW

- NCAT
- NSW Fair Trading
- NSW and Federal Courts
- Community Legal Centres and other community organisations
- other government agencies.

LRT has developed strong relationships with many of these stakeholders, who regularly engage with LRT to relay legal information needs and develop resources.

Examples include requests from NCAT and other external organisations for targeted legal information resources.

The proposal does not adequately address:

- How these stakeholder relationships will be maintained.
- Whether stakeholders have been consulted regarding the proposed changes.
- The impacts if key legal information resources are no longer actively monitored and updated.
- How legal risk will be managed if stakeholders and members of the public are forced to rely on outdated content.

Comparative tables of jobs descriptions:

The proposal does not clearly explain how the legal functions currently performed by LRT lawyers will continue under the proposed structure. To better understand the practical impact of the changes, it is useful to compare the responsibilities of the current Lawyer (LO I-III) role with those of the proposed Senior Copywriter and Copywriter positions.

This comparison demonstrates that LRT lawyers currently perform many of the functions contemplated by the proposed content roles, in addition to a range of specialised legal functions. The comparison also highlights several legal responsibilities that do not appear to be allocated to any identified role within the proposed structure.

Comprehensive Comparison: Lawyer (LO I-III) vs Senior Copywriter vs Copywriter

Function	Lawyer (LO I-III)	Senior Copywriter	Copywriter
Provide legal advice to clients	✓ Core responsibility	✗	✗
Provide minor legal assistance	✓ Core responsibility	✗	✗
Facilitate grants of aid	✓ Core responsibility	✗	✗
Develop legal information resources	✓ Draft and maintain	⚠ Translate and edit approved legal information	⚠ Translate and adapt approved legal information
Maintain legal information resources	✓	✗ Not specified	✗ Not specified
Ensure legal accuracy	✓ Direct responsibility	✗ Relies on legal review	✗ Relies on legal review

Interpret legislation	✓	✗	✗
Monitor legal developments	✓	✗	✗
Conduct legal research	✓	✗	✗
Legal drafting	✓	✗	✗
Assess legal risk	✓	✗	✗
Support LawAccess staff	✓	✗	✗
Train LawAccess staff	✓	✗	✗
Plain English writing	✓	✓	✓
Accessibility expertise	✓	✓	✓
Editorial review	Limited	✓ Primary responsibility	✓ Quality checking own work
Editorial quality assurance	✗	✓	✗
SEO optimisation	✗	✓ Advanced	✓ Basic
Analyse search data	✗	✓	✗
Manage contracted writers	✗	✓	✗

Content performance analysis	✗	✓	✗
User experience/content design	Limited	✓	✓

Qualifications and Technical Expertise

The differences between the roles extend beyond day-to-day responsibilities and are reflected in the qualifications, professional obligations and technical expertise required for each position. The comparison below illustrates that the proposed copywriter roles emphasise communications and content design capabilities, whereas the Lawyer role requires specialised legal knowledge, professional accreditation and the ability to independently interpret and apply the law.

This distinction is particularly important given that much of LRT's work involves identifying legal change, interpreting legislation and ensuring the legal accuracy of publicly available information relied upon by clients, LawAccess NSW and external stakeholders.

Area	Lawyer	Senior Copywriter	Copywriter
Practising certificate	Required	Not required	Not required
Admission as solicitor	Required	Not required	Not required
Legal advice experience	Required	Not required	Not required
Legal research skills	Required	Not required	Not required
Legal drafting skills	Required	Not required	Not required

Communications qualification	Not required	Required/preferred	Not required
Journalism/content design background	Not required	Required/preferred	Preferred experience
SEO knowledge	No	Advanced	Basic
Editorial expertise	Secondary	Advanced	Intermediate

The comparison demonstrates that the proposed copywriter positions are not direct replacements for the Lawyer (LO I-III) role. Rather, they appear to be complementary roles that would ordinarily operate alongside legal subject matter experts. The role descriptions repeatedly contemplate legal review, legal assurance and access to legal expertise, but the proposal does not clearly identify who will perform these functions if the LRT lawyer positions are removed.

While not all of these functions are expressly reflected in the Lawyer role description, they form a substantial part of the work currently undertaken by LRT lawyers in practice. This includes publishing content through Adobe Experience Manager, conducting accessibility reviews, monitoring legal developments, analysing usage data, improving SEO outcomes and responding to feedback from LawAccess NSW and external stakeholders.

Note: The Lawyers in the LRT currently have extensive knowledge in:

- **Editorial quality assurance-** LRT publish their own work using Adobe Experience Manager (Adobe) and maintain quality assurance. New content is in line with current accessibility guidelines as provided to us by digital communications, any existing content is also reviewed against this criteria. LRT also utilises Monsido technology to assist with quality assurance, and to set policies which reflect accessibility standards. Once the policy is run, LRT work towards updating content so that it is in line with accessibility standards, most recently through the Global Review work which involves a review of all topics, prioritised by popularity of topic, to ensure that content is up to date and meets current accessibility standards.
- **SEO optimisation-** As part of LRT's current publishing of own content through Adobe, the LRT actively enhances the SEO optimisation of the content, within the limits of the platform that is used. The LRT works with digital communications, and uses Monsido, to identify areas for SEO optimisation, though it should be noted that MPIA pages are currently 91% compliant with SEO checks.
- **Analysing search data-** LRT uses search data to help inform prioritisation of work tasks in accordance with available data, whether it be through Adobe analytics, user testing or Google analytics.

- **Content performance analysis**- LRT uses performance analysis through Google analytics software to be able to prioritise content that is frequently used, as well as using the data to inform other decisions such as trying to make content visible and accessible.
 - **User experience/content design**- LRT lawyers liaise frequently with the digital communications team to enhance and improve user experience. The LRT also responds feedback obtained from LawAccess to improve user experience.
-

Functions Lost if LRT Lawyers Are Removed

Based on the Lawyer role description, the following functions would not clearly sit within either the Senior Copywriter or Copywriter roles:

Legal Functions

- Providing legal advice.
- Providing minor assistance.
- Facilitating grants of aid.
- Legal research.
- Legal drafting.
- Legal risk assessment.
- Interpretation of legislation.
- Analysis of legal reforms.
- Monitoring legal developments.
- Applying legal expertise to legal content.

Content Maintenance Functions

- Legal review of MPIA content.
- Legal review of LawPrompt content.
- Legal review of forms, precedents and guidance documents.
- Identification and implementation of legislative changes.

- Legal quality assurance of website content.

LawAccess Functions

- Supporting LawAccess information officers.
- Training LawAccess staff.
- Responding to legal information queries.
- Providing legal guidance regarding resource content.

Stakeholder Functions

- Engagement with courts and tribunals.
- Engagement with external agencies regarding legal content.
- Subject matter expertise relied upon by stakeholders and government agencies.

Key Consultation Risks

The role comparisons above demonstrate the extent of the legal capability currently residing within LRT. The comparison also highlights a number of legal functions that do not appear to be expressly allocated to any position within the proposed structure. Accordingly, the risks identified in the Restructure Management Plan relating to capability and knowledge loss, service continuity and stale or inaccurate legal content warrant particular scrutiny.

The following risks arise from the apparent removal of legal expertise from the content creation, maintenance and review process.

Risk 1: No Identified Legal Subject Matter Experts

Both copywriter roles repeatedly refer to:

- legal subject matter experts;
- legal review;
- legal assurance; and

- matters requiring legal judgement.

However, neither role is responsible for undertaking those functions. Will these roles solely rely on the business partners and other lawyers from various divisions to do this work? If so, this will only lengthen the turnaround time for work to be completed.

Risk 2: Legal Change May Not Be Identified or Implemented

The Lawyer role includes maintaining knowledge of legal developments and implementing updates to resources. Neither copywriter role contains equivalent responsibilities.

This raises questions about:

- legislative updates;
- case law changes;
- regulatory changes; and
- policy changes affecting website content.

Risk 3: Quality and Accuracy of Legal Content

Copywriters are responsible for ensuring plain English, accessibility and usability.

Lawyers are responsible for ensuring legal accuracy.

The proposal does not explain how legal accuracy will be maintained once lawyer positions are removed.

Risk 4: Impact on LawAccess NSW

LawAccess relies heavily on LRT resources and expertise.

The Lawyer role specifically contains responsibility for:

- supporting LawAccess;
- training staff; and
- providing legal guidance.

These responsibilities do not appear in the proposed copywriter roles.

Risk 5: Increased Organisational Legal Risk

There appears to be a shift from a model where lawyers:

- create;
- review; and
- maintain

legal information, to a model where non-lawyers:

- write;
- edit; and
- publish

content based on legal input from unidentified sources.

This creates potential risks relating to:

- incorrect legal information;
- delayed updates;
- reduced capacity to respond to user needs;
- inconsistent interpretation of legal changes; and
- stakeholder reliance on outdated content.

Summary on role of lawyers within LRT:

The proposed copywriter roles repeatedly refer to obtaining legal review, legal assurance and input from legal subject matter experts. This indicates that the proposed model recognises the continued need for legal expertise. The proposal, however, does not identify where that expertise will sit, how it will be resourced, or how it will be provided in a timely and sustainable manner following the removal of dedicated LRT lawyer positions.

From all three role descriptions is that the proposed copywriter roles appear designed to **work alongside legal experts, not replace them**. Both copywriter roles expressly assume legal review, legal assurance and access to legal subject matter experts, yet the restructure appears to remove the very lawyers who currently perform those functions. Even though it is proposed that the senior business partners will ensure legal accuracy, the people writing the content still require legal skills to, firstly, understand the legal change, and then make that accessible in the form of plain language information.

LRT lawyers, on top of what is required of them, already do much of the roles as sought in the senior copywriter and copywriter role description.

Questions Requiring Clarification

1. Is it correct that responsibility for the ongoing maintenance and legal review of approximately 592 MPIA pages, 138 LawPrompt pages and 498 forms and precedents will sit primarily with two Copywriters and one Content Lead, in conjunction with the senior partners? What arrangements are proposed for the ongoing maintenance and legal review of LawPrompt and MPIA content?
2. Has Legal Aid NSW determined that these resources will be updated less frequently or maintained to a different standard than at present? If it is expected at the same level, how will these positions absorb this workload in addition to their other responsibilities?
3. What legal expertise will be available to support interpretation of legislative change and legal review of content? Furthermore, who will be responsible for identifying, assessing and implementing legal changes across the website? Will it be the responsibility of the senior partners to monitor all these changes and then communicate this to copywriters?
4. Was the statement regarding lawyers spending significant time drafting content intended to refer to LRT lawyers?
5. What assessment has been made of the impact on LawAccess NSW if legal information resources become less accurate or are updated less frequently?

6. What assessment has been made of the risks to stakeholders and members of the public who rely on Legal Aid's legal information?
7. Is a formal handover process proposed for any ongoing legal information functions?
8. Has Legal Aid considered converting one or more of the proposed content positions into lawyer positions, similar to arrangements proposed elsewhere within the organisation, to ensure ongoing legal expertise and oversight?
9. Has Legal Aid assessed the legal and reputational risks arising from the removal of dedicated legal expertise from the content creation and maintenance process?
10. If legal expertise is still required, why are lawyer positions being deleted rather than integrated into the proposed Content Design structure?

Summary

The proposal does not adequately explain how Legal Aid NSW will maintain the quality, accuracy and currency of its legal information resources once LRT's specialist legal expertise is removed. Given the critical role these resources play for LawAccess NSW, the public, courts, tribunals and external stakeholders. At a minimum, there should be ongoing lawyer involvement in drafting, reviewing and overseeing legal content to ensure Legal Aid continues to provide trusted and legally accurate information to the community.

SWAT restructure

Feedback 15

Sadly, I don't know what could said in relation to the loss of civil if they keep framing it as trying to prioritise family and crime as they are of higher priority.

Feedback 16

Page 3: Some clients who previously received advice through SWAT will instead receive information and referral assistance through LawAccess NSW.

Response: With the cutting of SWAT civil, we appreciate these matters will be referred to LawAccess for information and referral. Legal Aid is also proposing to dissolve the functions of the LRT, therefore unclear as to whether any new information will be created or maintained. Although there is a width of legal information, there will still be a large shortfall of clients who cannot access legal information, who won't be eligible for a referral and do not have the means to pay for private lawyers.

Page 4: The scope of the restructure includes:

- Removal of the Civil Team.
- Restructure of the Legal Resource Team (there is a separate restructure management plan for the LRT).
- Removal of Senior Solicitor Grade 5 role in the Family Team.
- Changes to administrative support roles, including conversion of the temporary Office Manager role to ongoing status.
- Reduction in Legal Client Service Officer positions.
- Creation of a revised SWAT structure aligned with organisational priorities, budget and service delivery requirements.

Temporary roles are not part of the restructure management plan and will be managed separately. The restructure does not affect organisational units outside SWAT and the units mentioned related to content, education and engagement.

Response:

- Not accurate to say that the LRT is be restructured when the whole team is being dissolved, apart from the Grade IV.
- It says that there is a conversion of the office manager role to ongoing, then contradicts itself below by saying that temporary roles are not in the proposed plan. Why should a temp be considered above permanent employees who already have the capability of a higher level and have acted in these roles. In relation to the admin support roles, is it feasible for them to be reduced to this level?

Page 6: The proposed restructure involves the removal of the Civil Team, transfer of the LRT function to the Content, Education and Engagement team in Central Sydney, deletion of the Family Grade 5 Solicitor position, redistribution of Family Solicitor reporting lines across the Crime and Family teams, cessation of the temporary LSCO and 1.6 ongoing LSCO positions,

	and the conversion of the Office Manager role to an ongoing position, leaving one ongoing LSCO role within the administration team. Page 9: Key Structural Changes ▪ Removal of the Civil Team, including the Grade 4 Senior Solicitor position and the four Grade 1-3 Solicitor roles. ▪ Restructure of the Legal Resource Team as per the proposed CEE Restructure Management Plan1. ▪ Deletion of the Family Team Senior Solicitor Grade 5 position. ▪ Deletion of two ongoing Legal Client Service Officer positions. ▪ Deletion of one temporary Legal Client Service Officer position. ▪ Conversion of the temporary Office Manager Grade 7/8 position to an ongoing role. Further down on page 9: ▪ Transfer the LRT function to the proposed Content, Education and Engagement team, supporting greater alignment with organisational priorities and service delivery objectives. Page 16: Crime Lawyer Grade I-III position to be filled during Stage 2 suitability assessment. Response: Why were non-crime lawyers in the LRT and civil teams being told that this may be a possibility to apply for if they have no crime experience? Realistically, these lawyers will be placed in WMP.
	Page 18: ▪ the cessation of LRT support to the Statewide Advice Team (advice shifts) in its current form, requiring transition arrangements to support ongoing service delivery Response: Why does the language of the proposal keep alluding to the LRT being 'transferred' or 'integrated' when the whole team is being dissolved? It should be made clear that the functions of the LRT will be given to non-lawyers and that the LRT will be dissolved or removed as part of the restructure.
Feedback 17	Individual circumstances ▪ Has been working with SWAT since November last year. ▪ Was advised that there was potential for the position to become ongoing. ▪ Was also told that, if a full-time ongoing position was not available, there would be a 0.6 FTE opportunity (current vacant ongoing role). ▪ Is in the process of relocating, to Mudgee. ▪ In January, advised management of plans to move back to the area on compassionate grounds due to ageing parents. ▪ Management was supportive of the move.

	▪ Approval was given to work two days per week from the Dubbo office (no requirement to attend office days in Parramatta). ▪ Move consideration was made on the basis of the advice received regarding ongoing employment prospects.
Feedback 18	Recruitment and ongoing role ▪ There are currently three LCSOs in the team. ▪ The other two LCSOs hold ongoing positions and will be able to compete for the one continuing role. ▪ Although currently in a temporary position, was merit selected for the role. ▪ Wants the opportunity to submit an EOI for the role that will be in the new structure. ▪ Question raised as to whether a temporary employee (with over 12 months service at LA) can compete for the role, given it is the only available position.
Feedback 19	Individual circumstances ▪ <redacted> was overseas at the time of the announcement and was subsequently advised that she would need to attend a meeting with a support person. ▪ She spoke with <redacted> in the week following the announcement. ▪ <redacted> has worked in SWAT as LCSO for approximately four years. ▪ Prior to there being an OM in SWAT, <redacted> was completing all these duties. ▪ She has been with LA for approximately nine years. ▪ <redacted> can provide a list of the tasks divided between OM and LCSOs in SWAT. ▪ <redacted> has acted as office manager in the civil law division grade 5/6, and is in the current OM grade 5/6 talent pool.
Feedback 20	Office Manager role ▪ OM role is classified at Grade 7/8. ▪ In January, funding for the OM position was announced. ▪ Approximately one week later, <redacted> was appointed from Blacktown. ▪ The current proposal would reduce the structure to: ▪ One Legal Client Service Officer (LCSO); and ▪ Retain the Grade 7/8 OM position. Concerns About the Proposed Structure

	▪ The team is reducing in size, yet the OM role remains at Grade 7/8. ▪ Under the proposed structure, the OM would supervise only one LCSO. ▪ There are relatively few OM positions at the Grade 7/8 level across the organisation, in large admin teams. ▪ The current OM occupant is temporary. ▪ The proposal indicates that the temporary occupant will be directly appointed to the ongoing position, with no opportunity for other employees to apply. Impact on LCSOs ▪ There are currently two ongoing LCSOs who will be competing for a single remaining LCSO position. ▪ One of those ongoing LCSOs is on the Office Manager Grade 5/6 talent pool. ▪ <redacted> is in the Grade 7/8 talent pool. ▪ <redacted> substantive position OM gr 5/6 at Blacktown is ongoing.
Feedback 21	Concerns About the Business Case The proposal states that the Office Manager role is responsible for: ▪ Acting as Intake Manager for SWAT. ▪ Supervising Legal Client Service Officers. ▪ Managing administrative processes, including coordination of prisoner appointments across CCMS and JusticeLink. ▪ Supporting client processes, including Family Law ERA bookings by phone and through the Client Portal. ▪ Providing operational support, including roster updates, CCMS clinic configuration and travel bookings. ▪ Managing the physical office, including liaison with Facilities and WHS, and coordinating fire warden and first aid training. The proposal states that making the Office Manager position ongoing will provide continuity and stability as responsibilities are consolidated within the revised structure. <redacted>'s view is that the duties listed are not all required to be undertaken by an OM and do not accurately reflect the role. Alternative Proposal ▪ Retain the two ongoing LCSO positions. ▪ The current Office Manager is temporary and has a substantive role to return to. ▪ <redacted> is currently on the Grade 5/6 talent pool.

	▪ If the SWAT Office Manager role were classified at Grade 5/6, <redacted> could potentially be appointed from the talent pool or would at least have the opportunity to put in an EOI for the role. ▪ This would allow the remaining LCSO position to be retained, avoiding the loss of an ongoing role. Question: What is the business case for retaining the higher graded 7/8 office manager when there is a reduced admin team?
Feedback 22	Management have indicated SWAT solicitors are not to be taken off clinic to attend the optional drop ins and instead should watch the recording or read the transcript (possibly during their own time given they are on back to back clinics). I think this is extremely unfair - comms, CLE and LRT staff are not on clinic and therefore are not restricted as to attending these meetings. Just my thoughts!
Feedback 23	Retention of Legal Client Service Officer Positions I submit that the proposed reduction of Legal Client Service Officer (LCSO) positions from three to one ongoing position should be reconsidered. The proposal has not established an evidence-based case that the work currently performed by three LCSOs can be effectively absorbed within the proposed structure while maintaining service delivery and client outcomes. LCSOs perform essential operational functions, including client intake, appointment coordination, client communication, and practitioner support. While positions may be removed, these functions and the associated workload will remain. The proposed reduction in administrative capacity coincides with a revised triage model that expands the scope of Family Law work within SWAT. Family Law solicitors will advise High-Priority Clients, provide prisoner advice services, undertake increased care and protection work, and provide expanded AVO advice. These changes are likely to increase, rather than reduce, demand for administrative support. The proposal therefore presents a fundamental inconsistency. It expands the scope and complexity of service delivery while simultaneously reducing the administrative capacity required to support it. The proposal does not explain how work currently undertaken by three LCSOs will be managed by one ongoing position. Importantly, no operational evidence has been provided demonstrating that administrative workload or support requirements will decrease under the proposed model. Nor have the revised triage arrangements been implemented or evaluated, meaning their practical impact remains unknown. In these circumstances, the proposed reduction in LCSO positions is premature. There is a real risk that administrative responsibilities will be transferred to solicitors.

	Accordingly, the proposed reduction in LCSO positions should be reconsidered. At a minimum, any decision to permanently reduce administrative staffing should be deferred until the revised triage arrangements have been implemented and evaluated, allowing staffing decisions to be informed by operational evidence rather than assumptions.
Feedback 24	Retention of the Grade 5 Senior Family Law Solicitor Position – Family Law, Statewide Advice Team (SWAT) I submit that the full-time ongoing Grade 5 Senior Family Law Solicitor position within SWAT should be retained. The proposed removal of this position is difficult to reconcile with the proposed future triage model. Under the proposed changes, Family Law solicitors in SWAT will undertake a broader and more complex range of work, including advising High-Priority Clients, providing prisoner advice services, undertaking increased Care and Protection work, and responding to expanded AVO enquiries, including non-PINOP and HPC PINOP matters. As the gateway to Legal Aid NSW services, SWAT performs a critical service delivery and risk management function. The quality and consistency of decisions made at first contact depend on access to experienced specialist practitioners who can provide supervision, guidance, and quality assurance in complex or high-risk matters. The proposal therefore presents a fundamental inconsistency. While the revised triage model expands the scope and complexity of Family Law work within SWAT, it simultaneously reduces senior specialist capacity through the removal of the Grade 5 Senior Family Law Solicitor position. The proposal does not explain why a service undertaking broader and higher-risk work requires less senior specialist oversight. Importantly, no operational evidence has been provided demonstrating that supervision requirements, workload complexity, service demand or organisational risk will decrease under the proposed model. Nor have the revised triage arrangements been implemented or evaluated, meaning their practical impact remains unknown. In these circumstances, the proposed abolition of the Grade 5 Senior Family Law Solicitor position is premature. It seeks to reduce senior specialist capacity before the demands and risks of the new model are understood. The Grade 5 position provides critical organisational capability through specialist leadership, supervision, quality assurance, staff development and support in complex matters. These functions will be particularly important during implementation of the revised triage model. Accordingly, the position should be retained. The proposed SWAT restructure increases the scope and complexity of family law work while simultaneously reducing senior specialist capacity. In the absence of evidence that the expanded service can operate effectively with reduced senior specialist oversight, the proposed abolition of the Grade

	5 Senior Family Law Solicitor position in SWAT is premature and is not supported by operational evidence.
Feedback 25	Historical Context Not everyone in SWAT may be aware that it was the new name given to the former Legal Advice Group (LAG) and Legal Resources Team (LRT) of LawAccess, which operated under the Department of Justice before Legal Aid's acquisition of LawAccess in around 2022. The proposed restructure management plan refers to changing service delivery requirements, increasing demand for legal assistance services, and ongoing budgetary and resource constraints. When Legal Aid took over LawAccess, it was a thriving frontline legal service that had operated since 2001 under the DoJ. Its three teams included the Legal Information Group (LIG), which I understand is not impacted by the current restructure, and the LAG and LRT, comprising lawyers who had left private practice to pursue greater social justice. We were assured that our roles would be protected following integration and that joining an organisation of Legal Aid's size and mission would provide greater career progression opportunities. SWAT Questions 1. Given that Legal Aid has experienced periods of expansion and contraction before, as you mentioned, Monique, was the possibility of budgetary constraints within five years of the integration anticipated? 2. Was any strategic planning undertaken to minimise the impact on the newly established SWAT? 3. If this restructure was not anticipated, would you agree that Legal Aid's failure to adequately plan for foreseeable financial and resourcing pressures has contributed to SWAT lawyers now facing the removal of their roles?