



## THE NIGERIAN BAR ASSOCIATION'S MANDATORY CONTINUING PROFESSIONAL DEVELOPMENT RULES AND ITS IMPACTS ON THE PRACTICE OF LAW IN NIGERIA

Taiye Joshua Omidoyin<sup>1</sup>, Michael Kehinde Osadare<sup>2</sup>, Emmanuel Utebor<sup>3</sup>

1. Senior Lecturer, College of Law, Afe Babalola University, Ado-Ekiti. Email: omidoyinjoshua@abuad.edu.ng
2. Lecturer, College of Law, Afe Babalola University, Ado-Ekiti. Email: osadarekehinde@abuad.edu.ng
3. Lecturer, College of Law, Afe Babalola University, Ado-Ekiti. Email: emmautebor@abuad.edu.ng

### Article Information:

**Article Type:**  
Research Article

**Manuscript Received:**  
13 February 2026

**Final Revision Received:**  
25 April 2026

**Published Online:**  
15 May 2026

**Keywords:**  
Professional development,  
access to justice,  
professionalism, legal  
profession

The need for lawyers to engage in continuous legal education cannot be over-emphasized, especially with the rising necessity to meet up with emerging areas of law and international best practices. In response to this need, the Nigerian Bar Association introduced the Mandatory Continuing Professional Development (MCPD) Rules which made it compulsory for lawyers in Nigeria to participate in a stipulated number of trainings and conferences in order to meet up the continuing professional development requirement. This step however sparked intense reactions among lawyers, while some saw it as a measure of enhance professional competence, others saw it as a needless measure that undermines the professional integrity of Nigerian lawyers. This study therefore examined the impacts of the implementation of the NBA's MCPD Rules on the practice of law in Nigeria. The study relied on existing legal framework and relevant literatures as sources of information to arrive at its findings. As part of its findings, the study revealed that the introduction of the mandatory continuing professional development programme is a step in the right direction as it is essential in promoting professionalism and integrity in the legal profession, although with some necessary modifications in the areas of accreditation of service providers and cost. The study concludes that the benefits of the mandatory continuing professional development programme outweigh its potential drawbacks, and it is recommended that the initiative of the mandatory continuing professional development programme be embraced, with possible modifications, for its sustainability.

**Cite this article:** Taiye J. Omidoyin, Micheal K. Osadare, and Emmanuel Utebor (2027). The Nigerian Bar Association's Mandatory Continuing Professional Development Rules and Its Impacts on the Practice of Law in Nigeria. The Journal of Sustainable Development, Law and Policy. Vol. 18:1. 385-395. DOI: 10.4314/jsdlp.v18i1.15



© The Author(s)

**Publisher:** Institute for Oil, Energy, Environment and Sustainable Development (OGES Institute), Afe Babalola University, Ado Ekiti, Nigeria.

## 1. INTRODUCTION

The Nigerian Bar Association recently announced the need for all lawyers in Nigeria to undergo continuous professional Development so as to remain current on the requisite knowledge, skills and values necessary to effectively discharge the duties and obligations of a legal practitioner.<sup>1</sup> The leadership of Nigerian Bar Association through the National Executive Committee at its meeting on 6<sup>th</sup> February, 2025 in Akure approved the Mandatory Continuing Professional Development Rules (MCPD Rules) pursuant to Rule 11 of the Rules of Professional Conduct for Legal Practitioners 2023. The MCPD Rules make it compulsory for lawyers to have a minimum of 5 points annually else, annual practice license will not be issued.

The rationale for this perceived development is to improve the standard of legal practice in Nigeria in order to meet international best practices and also to increase the level of ethical adherence among lawyers in Nigeria. This mandate is to be achieved through lawyers' participation in accredited lectures, seminars, workshops and conferences. Participatory lawyers would be awarded certificates with accompanying CPD credits. This development has however received mixed reactions as some lawyers regard it as a double-edged sword, rather from a step in the right direction. While some believe the initiative is necessary to keep lawyers abreast with emerging areas of law and enhance professional competence, others believe it is totally unnecessary to make the continuous professional development a mandatory requirement for the practice of law in Nigeria because the provisions of the Legal Practitioners Act is clear on the qualifications to practice as a barrister and solicitor of the Supreme Court of Nigeria. More so, it has been further agitated that even if lawyers in Nigeria are to undergo mandatory continuous professional development programmes, such should be without any expense whatsoever on the part of the participants.

---

<sup>1</sup> 'Setting the Record Straight on Mandatory CPD Requirement and the Right to Practice Law' available at <https://blog.nigerianbar.org> accessed 27 July, 2025.

In harmonizing this issue, this study attempts to examine the impacts of the implementation of the NBA's MCPD Rules on the practice of law in Nigeria. The legality on the enforcement of the MCPD Rules in Nigeria is examined, alongside its overriding advantages. The drawbacks that may inhibit the sustenance of the MCPD initiative in the practice of law in Nigeria is also considered.

## **2.0 LEGALITY OF THE NBA MANDATORY CONTINUING PROFESSIONAL DEVELOPMENT RULES**

A convenient legal basis for the Mandatory Continuing Professional Development (MCPD) programme is the consideration of the Rules of Professional Conduct 2007 made pursuant to the Legal Practitioners' Act 2007, which compulsorily requires the legal practitioners to satisfy the requirements of the MCPD programme under the supervision of the Nigerian Bar Association. The MCPD programme is considered legal as it is authorized by the NBA's Rules of professional conduct for legal practitioners. The MCPD programme legality stems from the NBA's power to regulate its members and ensures continuous adequate learning for effective professional practice. The NBA has the authority to regulate the legal profession in Nigeria and set standards for its members including the MCPD programme. The MCPD programme aims to ensure that legal practitioners continuously update their knowledge and skills, thereby maintaining a high standard of professional practice.

It must be pointed out that the MCPD requirement is not a new creation of the NBA administration, nor is it arbitrary. It is backed by the Rules of Professional Conduct (RPC).<sup>2</sup> Rule 11 of the RPC expressly states that a lawyer who wishes to carry on practice as a legal practitioner shall participate in and satisfy the requirements of the mandatory Continuing Professional Development (CPD) Programme operated by the Nigerian Bar Association. Rule 11(2), RPC stipulates that the activities in which a lawyer is required to participate for the purpose of the CPD Programme. The NBA is further empowered by Rule 12 of the RPC to publish every year list of legal practitioners to be entitled to practice as legal practitioners

---

2 Rules 11 and 12 of the Rules of Professional Conduct

in that year, after complying with the requirements of the Continuing Professional Development Programme and payment of their practicing fees, and issue a Practicing Certificate to a legal practitioner whose name is on the Annual Practicing List, certifying that he/she has paid his Practicing Fee for the specified year and complied with the requirement of the Continuing Professional Development Programme for the year under the rules made for that purpose by the Association.

Without these two requirements, a lawyer's name will not appear on the Annual Practicing List, and no Practicing Certificate will be issued. NBA simply set out to comply with the mandatory requirements of the law to ensure that Nigerian lawyers comply with the statutory requirements for mandatory continuing professional development. The NBA, through its Institute of Continuing Legal Education (NBA-ICLE), is the designated body responsible for giving effect to these rules, particularly those relating to continuing professional development.<sup>3</sup> This is akin to the enforcement of the Stamp and Seal policy, which also derives its mandate from the RPC and is implemented through NBA regulations by the Bar Services department of the NBA National Secretariat.<sup>4</sup>

It must be further noted that the NBA's enforcement of CPD and practicing certificate requirements is not only legally grounded; it is a duty owed to the profession, the courts, and the public. It is important to note that the concept of mandatory Continuing Legal Education (CLE) is not a recent innovation introduced by the 2025 NBA MCPD Rules. It has been a cornerstone of professional development within the Nigerian legal profession for well over a decade. The 2007 Rules of Professional Conduct and the subsequent 2007 MCLE Rules already provided for Mandatory Continuing Professional Development. The NBA NEC approved the Mandatory Continuing Legal Education Rules (MCLE Rules) on 15th February 2007, and NBA-NEC subsequently amended the Rules on 21st February 2008 and 29th June 2008. Pursuant to the provisions of the MCLE Rules, the MCLE Board issued guidelines for the implementation of the programme on 13th November 2007.

---

3 Rule 11 (5), *ibid*.

4 Information available at [www.nbaicle.org](http://www.nbaicle.org) accessed on 29 July 2025.

The 2025 NBA MCPD Rules were reviewed and approved at the NBA-NEC meeting of the 6th of February 2025 and are therefore not introducing a new concept, but rather are a refinement and a more robust enforcement mechanism for a requirement that has long existed in our professional regulations. The key difference now is the renewed commitment to the strict implementation of what was already provided for in the earlier rules.<sup>5</sup>

Again, the MCPD programme is not intended to be punitive; its primary objective is to enhance the competence, ethical compliance, and overall professionalism of legal practitioners in Nigeria. The legal landscape is constantly evolving, with new laws, judicial pronouncements, and technological advancements emerging regularly. Without continuous learning, lawyers risk becoming obsolete and delivering suboptimal services to their clients and the justice system. The 5-CPD credit annual requirement is a minimum standard designed to ensure that every lawyer stays abreast of these developments, maintains high ethical standards, and continues to provide competent legal services. The law is therefore very clear that no lawyer may carry out any of the acts stated above in Nigeria unless he/she has been issued an Annual Practising Certificate by the NBA.<sup>6</sup>

In the United States of America<sup>7</sup>, after passing the bar exam, lawyers must participate in Continuing Legal Education (CLE), also known as Mandatory or Minimum Continuing Legal Education (MCLE), which ensures lawyers stay current on legal developments and maintain their licenses to practice. This programme is generally not mandated at the federal level but is often required by individual states and professional organizations. Many professions, such as law, medicine, and accounting, have specific continuing education requirements for maintaining licensure or certification. The specific requirements for CPD, like the number of credits, type of activities, etc., vary widely by profession and even by specialization within a profession.

---

5 Information available at <https://www.nbaicle.org/trainings> accessed on 29 July, 2025.

6 Rule 12(3), RPC.

7 Information available at <https://thecpd.group> accessed on 29 July, 2025.

In Europe<sup>8</sup>, CPD requirements vary from country to country and are dependent on the extent of regulation within each sector. The CPD within Australia and New Zealand follows a similar model to the United Kingdom. Many professions are led by professional institutes, bodies, and regulators, all with similar CPD schemes and requirements to their UK counterparts. The practice of CPD is highly valued, and as a result, there are various training, event and online providers registered with the CPD Standards Office who deliver training in this region. The CPD Research Project has identified that there are a larger number of professional bodies and institutes within Western Europe, with many countries in Eastern Europe slowly beginning to establish professional bodies and associated CPD requirements within the region. Many CPD Standards providers operate within various European countries and are active in delivering training provision to European professionals.

Across the African continent<sup>9</sup>, CPD is an emerging practice with many individuals and professionals keen to undertake CPD for ongoing educational purposes. The CPD Standards Office has some providers who deliver in this region, with a number based in South Africa.

### **3.0 NECESSITY AND IMPACTS OF THE NBA'S MCPD RULES**

The NBA's Mandatory Continuing Professional Development (MCPD) rules are crucial for maintaining the competence and ethical standards of legal practitioners in Nigeria. These rules, overseen by the NBA-ICLE, require lawyers to participate in accredited Continuing Professional Development (CPD) programs, ensuring they stay current with legal knowledge, skills, and ethical practices. The MCPD impacts Nigerian lawyers by enhancing their professional development, improving service delivery, and upholding the integrity of the legal profession. Necessity and impacts of the MCPD are as follows:<sup>10</sup>

---

8 Information available at <https://www.cpdeurope.org> accessed on 29 July, 2025

9 Information available at <https://cpd.africa.org> accessed on 29 July, 2025.

10 <https://blog.nigerianbar.org.ng/2025/06/20setting-the-record-straight-on-mandatory-cpd-requirement-and-the-right-to-practice-law.> accessed on 29 July, 2025.

- 1. Enhances Professional Competence:** The MCPD ensures lawyers remain up-to-date with the latest legal developments, which is vital for providing effective and efficient legal services.
- 2. Improves Service Delivery:** By participating in CPD activities, lawyers can enhance their skills and knowledge, ultimately leading to better service delivery and client satisfaction.
- 3. Upholds Professional Standards:** The MCPD promotes ethical conduct and professional responsibility, contributing to the overall integrity and reputation of the legal profession.
- 4. Facilitates Continuous Learning:** The MCPD fosters a culture of lifelong learning, encouraging lawyers to adapt to the ever-changing legal landscape.
- 5. Maintains Practicing Certificates:** Compliance with the MCPD is now a mandatory requirement for renewing practicing licenses and maintaining the use of the stamp and seal.
- 6. Public Trust and Confidence:** By demonstrating a commitment to ongoing professional development, the MCPD helps to maintain public trust and confidence in the legal profession.
- 7. Global Competitiveness:** The MCPD aligns with international best practices, ensuring Nigerian lawyers are well-equipped to compete in the global legal market.
- 8. Potential for Reduced Extortion:** While there are concerns about the cost of some CPD programs, the NBA-ICLE offers free training, and lawyers can also earn credits through other activities like pro bono work. In essence, the MCPD is not just a regulatory requirement, but a vital mechanism for ensuring that Nigerian lawyers remain competent, ethical, and relevant in a rapidly evolving legal environment.

#### **4.0 DRAWBACKS AND PITFALLS OF THE MCPD RULES IN NIGERIA**

Mandatory professional Development for lawyers in Nigeria seems to be a policy that have come to stay going by the aggressive manner of it's implementation by the present leadership of the Nigeria Bar Association, while the proponents of the MCPD may be convinced by the advantages

of the MCPD, the drawbacks and pitfalls of the MPCD in Nigeria should not be ignored.

Generally, legal practice in Nigeria is highly competitive due to the high number of lawyers admitted annually to practice law, it is also tasking and stressful considering the working environment of most lawyers and the penchant to meeting excruciating deadlines and uphold professional integrity and competence, thus the present enforcement MCPD in Nigeria will further exacerbate the situation. The qualification to practice law in Nigeria is expressly provided in the Legal Practitioners Act<sup>11</sup>, earning a CPD points was never made a criteria for the qualification to practice law in Nigeria, while the Rules of Professional Conduct makes provisions for MCPD<sup>12</sup> and which is being relied for its enforcement, the Rules of Professional Conduct is a subsidiary legislation and cannot override the Legal Practitioners Act, which is a principal legislation for the legal profession in Nigeria, the threat to deny lawyers the right to practice law in Nigeria if they do not earn CPD points raises questions about the legality of the MCPD.

The ways and manner stipulated for the earning of CPD points as contained in the RPC which amongst others includes attendance and participation in accredited courses, lectures and seminars approved by the Nigerian Bar Association, writing on the law and practice in books and journals approved by the Nigerian Bar Association and the likes, is suggestive that the MCPD is overreaching and an attempt by the Nigerian Bar Association to expand its regulatory oversight beyond legal practitioners in Nigeria. There are institutions in Nigeria that organizes law seminars and conferences, which by their very nature will not be approved by the Nigerian Bar Association because these institutions are autonomous of the Nigerian Bar Association as they are regulated by other extant laws of the Federal Republic of Nigeria or their own rules of professional conduct, for example, there are Universities in Nigeria duly established by law, approved and accredited by the relevant regulatory

---

<sup>11</sup> Legal Practitioners Act

<sup>12</sup> Rule of Professional Conduct, Rule 11

bodies in Nigeria to establish and run law<sup>13</sup> programs and faculty, and as part of their curriculum or commitment to research and legal education, such institution organizes conferences and seminars on law, and a legal practitioner participates in such conferences will such and if a legal practitioner participates in such conferences' will such a legal practitioner be regarded as having not participated in MCPD or be denied the right to practice law because that conference/seminar was not approved by the Nigerian Bar Association? When the organizers of the conference on law are statutorily empowered to do so, and when such institution is not in any way subject to the control, supervision and regulatory oversight of the Nigerian Bar Association.

The Nigerian Bar Association is an umbrella body of lawyers duly called to practice law in Nigeria, and they do not have control over the law programs or curriculum of Nigerian Universities established in accordance with the due process of law to run law programs, subjecting law conferences and seminars organized by Universities to the approval will amount to eroding the age long principle of University autonomy and as well as encroachment into the statutory responsibilities of the National Universities Commission and the Council for Legal Education, which are bodies duly established by law to accredit and approve law programs in Nigeria Universities.

For a lawyer to be entitled to issuance of practice license, he/she must have earned a minimum CPD points by attending approved NBA law conferences/seminars or published articles in approved NBA Journals, it is also very imperative to note that most law journals or academic journals are usually part of the research output or commitment of most Universities' faculty of law, and as such, these journals are managed by editorial boards not subject to the supervisory control of the Nigerian Bar Association, irrespective of whether a member or any member of the editorial board are members of the Nigerian Bar Association. These journals are self-funded, and since they are not being funded or supported by the Nigerian Bar Association, thus failure for such a journal to get the Nigerian Bar Association approval before publishing any article cannot in

---

13 Section 4, National Universities Commission Act

anyway affect or undermine the credibility of any law article published by such a journal, especially when such journals adheres to established publication ethics and those articles having been peer reviewed by experts in the relevant fields.

Another pitfall of the MPCD is the funding of the training sessions by the service providers, while the NBA-ICLE, has given lawyers the options to earn CPD points by attending free training sessions by duly accredited service providers, the service providers are charged fees by the NBA-ICLE for such training sessions to be approved, monitored and eligible for CPD points, thus if the NBA-ICLE charges services providers to get their training sessions accredited and eligible for CPD points, then such service providers may not be able to sustain or fund such free training sessions/programs in the long run as they will likely pass the cost of such trainings to lawyers, and considering the harsh economic realities, this will put more financial strain on lawyers.

## 5.0 RECOMMENDATIONS

There is no doubt that the MCPD has been met with lots of mixed feelings and no matter how we these feelings are perceived, they cannot be wished away, rather the NBA-ICLE should examine these feelings holistically and make a decision, however this paper recommends that the NBA-ICLE should not charge fees for service providers who provide free training/sessions for lawyers including NBA Branches that seeks to be accredited, rather the NBA Branches should be encourage to incorporate Knowledge Sharing Sessions as part of their monthly meeting activities, and branches should be made to compile names of lawyers that participated, which list shall be transmitted to the NBA-ICLE for the purposes of earning CPD points. Secondly, branch activities such as law week, symposium should be approved by the NBA-ICLE as means of earning CPD points by lawyers, doing this will improve lawyers participation in branch activities. Third, law Conferences/seminars organized by duly accredited Law Faculties of Nigerian Universities should ordinarily earn participants who are lawyers CPD points, such programs need not be approved by the Nigerian Bar Association as those Universities are not subject to the supervision of the NBA by law.

Finally, the NBA-ICLE should be well funded from the annual bar practicing fees of lawyers, leveraging of the goodwill of the NBA to raise funds to organize free trainings for lawyers to earn CPD points. Over the last years, the NBA-ICLE has successfully trained a good number of lawyers in Nigeria, and CPD points were earned from those trainings as well as certificates were also issued. Such efforts should be further enhanced and supported.

## **6.0 CONCLUSION**

The global trend of professionalism, expertise and integrity required of a legal practitioner as the world evolves cannot be jettisoned, and Nigerian lawyers cannot afford to be left behind. Meanwhile, one of the means of attaining this standard is through continuous professional development and trainings for lawyers. Considering the inadaptability of some lawyers to continuous legal education, the Nigerian Bar Association made it mandatory for every lawyer to undergo continuous professional and a requirement for the issuance of annual practice license. This initiative, though with some potential challenges and drawbacks, is a positive step in attaining the required standard of professionalism, expertise, competence and integrity expected of lawyers in Nigeria to meet up with international best practices. The sustenance of the mandatory continuous professional development programme however requires the collaborative efforts of all lawyers and commitment of successive leaderships of the Nigerian Bar Association towards ensuring lawyers in Nigeria stay above the minimum global professional benchmark.