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CONTINUING PROFESSIONAL DEVELOPMENT PROGRAMME IN THE NIGERIAN LEGAL PROFESSION: TOOL OR THORN?

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ABSTRACT

Continuing Professional Development (CPD) has become a central feature of modern legal regulation, aimed at ensuring that lawyers maintain competence and professional relevance throughout their careers. In Nigeria, CPD is mandatory for legal practitioners and is largely administered through the Nigerian Bar Association and its Institute of Continuing Legal Education. Despite its importance, the programme has generated growing dissatisfaction among lawyers, raising concerns about its usefulness, accessibility, cost, and overall impact on legal practice. This paper examines whether CPD in the Nigerian legal profession functions as a genuine tool for professional improvement or has become a regulatory burden that undermines its intended purpose. The objectives of the paper are to clarify the concept of CPD, examine the legal and institutional frameworks governing its operation in Nigeria, review existing scholarly views, and draw lessons from selected foreign jurisdictions. Using doctrinal and comparative analysis, the paper finds that CPD is conceptually sound and necessary for maintaining professional standards. However, its implementation in Nigeria is weakened by poor content design, high costs, limited accessibility, and an excessive focus on credit-hour compliance rather than skills development. The paper recommends restructuring CPD content to emphasise practical skills, expanding affordable digital learning platforms, adopting flexible and outcomes-based compliance models, and improving transparency in enforcement. Properly reformed, CPD can serve as an effective tool for strengthening the Nigerian legal profession.

Keywords: Continuing Professional Development; Nigerian Legal Profession; Legal Education; Professional Regulation; Mandatory CPD

1.0 Introduction

The legal profession is built on trust, skill, and public confidence. Lawyers are expected to know the law, apply it correctly, and act ethically at all times. However, the law does not remain the same. New statutes are enacted, courts change legal interpretations, technology reshapes legal practice, and society raises new expectations from lawyers. For this reason, modern legal systems increasingly insist that lawyers must continue learning long after they are called to the Bar. Continuing Professional Development (CPD) has therefore become a key regulatory tool used to ensure that lawyers remain competent, relevant, and accountable throughout their careers.[3]

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[3] S. Mayson, *Reforming Legal Services: Regulation Beyond the Echo Chambers* (Centre for Ethics & Law, University College London 2020) 3.

In Nigeria, CPD has moved from being a voluntary professional habit to a mandatory regulatory requirement. The Nigerian Bar Association (NBA), through its Institute of Continuing Legal Education (ICLE), now

requires lawyers to earn a prescribed number of CPD credit hours annually as a condition for practising law and renewing their practising fees.[4] This shift reflects a global trend in legal regulation, where professional bodies see continuous learning as essential for maintaining standards and protecting the public. Yet, despite its stated objectives, the Nigerian CPD regime has generated serious debate within the legal profession. Many lawyers question whether CPD, as currently structured and implemented, truly improves professional competence or merely adds another layer of financial and administrative burden.[5]

Supporters of CPD argue that it is an important tool for improving the quality of legal practice in Nigeria. They contend that CPD helps lawyers stay updated on legal developments, improves advocacy and drafting skills, and exposes practitioners to emerging areas such as technology law, data protection, and alternative dispute resolution.[6] From this perspective, CPD strengthens the profession, enhances public confidence, and aligns Nigerian legal practice with international standards. In a country where poor legal representation can have serious consequences for justice delivery, CPD is presented as a necessary safeguard rather than an optional extra.[7]

On the other hand, critics view CPD as a thorn in the side of legal practitioners, especially young lawyers and those practising outside major cities. Concerns have been raised about the high cost of CPD programmes, limited access to quality training in rural areas, and the perceived emphasis on compliance rather than genuine learning.[8] Many lawyers argue that CPD has become a "tick-the-box" exercise, where attendance matters more than knowledge gained. Others question the transparency of CPD administration and the fairness of sanctions imposed for non-compliance.[9] These criticisms suggest that CPD, if poorly designed or insensitively enforced, may undermine rather than promote professionalism.

The debate over CPD in Nigeria also raises broader regulatory questions. Should professional development be driven by compulsory rules or personal responsibility? How should professional bodies balance quality control with the economic realities of legal practice in a developing country? What lessons can Nigeria learn from other jurisdictions that have reformed their CPD systems to focus on outcomes rather than hours spent in seminars? These questions are important because CPD is no longer just an internal professional matter; it affects access to justice, client protection, and the credibility of the legal system as a whole.

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4 Nigerian Bar Association, *Mandatory Continuing Professional Development (MCPD) Rules, 2025* (NBA-ICLE, 2025) Rule 3, Part I, p 3 <https://www.nbaicle.org/_files/ugd/81a65d_03fc1c9b473a4c6c8ebb26d02debfcc2.pdf> accessed 2 January 2026.

5 U. Nnawulezi and H. Nwaechefu, "Repositioning the Nigerian Lawyer Through Mandatory Continuing Legal Education: Developing a Cross-Border Approach to Legal Education" (2022) 4(3) *Indonesian Journal of International Clinical Legal Education* 261–300.

6 *Ibid.*

7 Nnawulezi and H. Nwaechefu, (n 4) 269.

8 E. Ngige & S.C. Udemezue, "Navigating the Future of Legal Education in Contemporary Nigeria: Effective Strategies for Addressing Current Challenges and Proposals for Reforms" (2025) 2(4) *International Journal for Public Policy, Law and Development* 19-31.

9 *Ibid.*

Despite the growing importance of CPD, there is still limited critical academic analysis of its operation within the Nigerian legal profession. Much of the existing discussion is descriptive or policy-based, with little sustained evaluation of whether CPD is achieving its stated goals. There is also a gap in comparative analysis that situates Nigeria's CPD framework within broader global practices. Without such analysis, reforms risk being driven by assumptions rather than evidence.

This article addresses these gaps by critically examining the Continuing Professional Development Programme in the Nigerian legal profession and asking a central question: is CPD a useful tool for professional growth, or has it become a thorn that burdens lawyers without delivering real value? The article adopts a doctrinal and comparative approach. It first clarifies the concept of CPD and sets out the theoretical ideas that justify continuous professional learning. It then examines the legal and institutional frameworks governing CPD in Nigeria, followed by a review of relevant literature. To provide context and perspective, the article compares Nigeria's CPD regime with practices in the United Kingdom, Canada, and South Africa. Finally, the article evaluates whether CPD, as currently implemented, functions more as a tool or a thorn and offers practical recommendations for reform. Through this structured analysis, the article aims to contribute meaningfully to policy debates and professional discourse on the future of CPD in Nigeria.

2.**Conceptual Clarification**

CPD is a structured process of ongoing learning that professionals undertake throughout their careers to ensure they remain competent, effective, and up to date in their practice. CPD goes beyond the initial qualifications obtained at the point of entry into a profession; it is a continuous obligation to refresh and expand knowledge and skills over time.[10] CPD activities can include attending workshops, seminars, conferences, formal courses, informal learning, self-study, and skills training that relate directly to a professional's area of work. This ongoing learning is essential because the legal environment, client needs, and professional standards evolve constantly. CPD therefore serves to keep legal practitioners abreast of new developments, ethical standards, and practical skills required to deliver competent legal services.[11]

In many jurisdictions, including Nigeria, CPD is not merely a voluntary commitment to learning; it is a regulated requirement for legal practitioners to maintain their professional credentials and license to practice.[12] CPD is distinct from routine work responsibilities because it involves deliberate learning aimed at enhancing professional competence rather than the day-to-day tasks of serving clients or managing cases.[13] By engaging in CPD, lawyers ensure that their legal knowledge does not become obsolete and that they can competently navigate changes in law, procedure, and professional ethics.

The core purpose of CPD is to protect the public interest by ensuring that legal professionals maintain a high standard of service throughout their careers. Regulatory bodies in various jurisdictions emphasis that CPD helps maintain public confidence in the legal profession by requiring practitioners to demonstrate ongoing

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10 A.L. Friedman, *Continuing Professional Development: Lifelong Learning of Millions* (Routledge, 2013) 2.

11 *Ibid.*

12 S. Onyekwelu, *Nigerian bar moves to tie 2026 licences, seals to CPD compliance* (*BusinessDay NG*, 2 September 2025) <https://businessday.ng/news/article/nigerian-bar-moves-to-tie-2026-licences-seals-to-cpd-compliance/> accessed 2 January 2026.

13 Wolters Kluwer, 'What is Continuing Professional Development' (WoltersKluwer.com) <https://www.wolterskluwer.com/en-au/solutions/tax-and-legal/continuing-professional-development> accessed 2 January 2026.

competence.[14] The underlying assumption is that professional competence is not static but requires regular renewal and improvement to reflect contemporary legal needs and societal expectations. Thus, CPD aligns professional performance with public trust and accountability.

CPD is often linked with related concepts like Continuing Legal Education (CLE) and Mandatory Continuing Legal Education (MCLE). CLE refers specifically to formal educational programmes for lawyers after their admission to the bar, while MCLE represents statutory schemes that require lawyers to complete a set minimum of educational hours to retain practicing status.[15] In jurisdictions outside North America, the term CPD is more commonly used to describe a broader learning framework that includes but is not limited to formal legal education.[16] In practice, both CPD and CLE serve the same fundamental purpose: to ensure that legal practitioners stay informed and capable across the duration of their professional lives.

A robust conceptual understanding of CPD recognises that development is both formal and informal. Formal CPD involves structured courses with measurable outcomes, whereas informal CPD may include self-directed study, participation in professional committees, mentoring, research, publishing, and reflective practice.[17] Both forms contribute to a lawyer's ability to adapt to new legal challenges and improve service quality. By documenting and planning these learning activities, legal professionals can map their development needs over time, thus integrating lifelong learning into their careers rather than reducing CPD to a perfunctory annual task.

3.**Theoretical Framework**

This paper is anchored on three complementary theories that explain why CPD exists, how it should function, and why it sometimes creates tension within the legal profession. These are Professionalism Theory, Lifelong Learning Theory, and Regulatory Compliance Theory. Together, they provide a clear lens for assessing whether CPD in the Nigerian legal profession operates as a useful tool or has become a thorn.

Professionalism Theory was most clearly developed by Eliot Freidson in the late twentieth century, particularly in his work *Professionalism: The Third Logic* published in 2001.[18] Freidson argued that professions are granted autonomy by society because they possess specialised knowledge, ethical standards, and a commitment to public service. In return, professionals are expected to regulate themselves and maintain

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[14] Law Society of the Northwest Territories, 'Continuing Professional Development (CPD)' (LawSociety.NT.ca) <https://lawsociety.nt.ca/for-lawyers/continued-professional-development-cpd/> accessed 2 January 2026.

[15] L.A. Grigg, "Mandatory Continuing Legal Education: Is it Improving Lawyer Competence or Just Busy Work?" (1998) 33 *Georgetown Journal of Legal Ethics* 301–320.

[16] C. Halton, F. Powell and M. Scanlon, *Continuing Professional Development: The International Context'* in *Continuing Professional Development in Social Work* (Policy Press / Bristol University Press 2013) 13.

[17] P.O. Eromosele and P. Erikume, "Knowledge Dissemination: A Way of Continuous Professional Development (CPD) for Law Librarians in Nigeria" (2025) 35(1) African Journal of Library, Archives and Information Science 1–8.

[18] E. Freidson, *Professionalism: The Third Logic* (Polity Press, 2001) 1.

competence throughout their careers. According to him, professional status is not permanent; it must be continuously justified through skill, discipline, and ethical conduct.[19] Applied to this study, CPD represents one of the strongest tools through which the legal profession demonstrates ongoing competence and

responsibility to society. In Nigeria, where lawyers occupy critical roles in governance, justice delivery, and rights protection, CPD aligns with the professional obligation to remain current with legal developments. However, when CPD is poorly structured or perceived mainly as a revenue-generating requirement, it weakens professionalism instead of strengthening it, thereby turning the intended tool into a burden.

Lifelong Learning Theory provides the second theoretical foundation. This theory was advanced by Malcolm Knowles in the 1970s through his work on adult learning, particularly *The Adult Learner*, first published in 1973.[20] Knowles argued that adults learn best when learning is continuous, self-directed, and connected to real-life professional needs. He emphasised that learning does not stop at formal qualification but must continue throughout one's working life to remain effective.[21] In the context of legal practice, the law evolves rapidly through legislation, judicial decisions, and technological change. CPD fits squarely within lifelong learning theory because it is meant to help lawyers update their knowledge and practical skills. For Nigerian lawyers, CPD should therefore be flexible, relevant, and responsive to diverse areas of practice. Where CPD programmes are rigid, repetitive, or disconnected from practical realities, they contradict the very principles of lifelong learning and lose their educational value.

The third framework is Regulatory Compliance Theory, particularly the model of responsive regulation developed by Ian Ayres and John Braithwaite in 1992.[22] They argued that effective regulation should balance persuasion and enforcement, rather than relying only on punishment. According to them, compliance improves when regulated persons see rules as fair, reasonable, and beneficial.[23] Applied to CPD in Nigeria, this theory explains why resistance arises when CPD rules are enforced mainly through sanctions such as denial of practice rights, without adequate support, accessibility, or transparency. When lawyers perceive CPD as imposed rather than supportive, compliance becomes mechanical rather than meaningful. This study uses regulatory compliance theory to assess whether Nigeria's CPD framework encourages genuine professional growth or merely coerces attendance.

Together, these theories justify CPD as a necessary professional mechanism while also exposing the conditions under which it becomes counterproductive. They provide a solid theoretical base for evaluating CPD in Nigeria as either a genuine tool for professional development or a regulatory thorn.

4.**Legal Framework for Continuing Professional Development Programme in Nigeria**

The legal framework for CPD in the Nigerian legal profession is now statutory and enforceable. It is grounded primarily in the Rules of Professional Conduct for Legal Practitioners (RPC), 2023, and given practical force

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19 *Ibid*, 127.

20 M.S. Knowles, *The Adult Learner: A Neglected Species* (Gulf Publishing, 1973) 15.

21 *Ibid*, 63.

22 I. Ayres and J. Braithwaite, *Responsive Regulation: Transcending the Deregulation Debate* (Oxford University Press, 1992) 3.

23 *Ibid*, 101.

by the Mandatory Continuing Professional Development (MCPD) Rules, 2025 adopted by the NBA. These instruments establish CPD not as an optional guideline but as a condition for lawful legal practice in Nigeria.

Under Rule 11(1) of the RPC, 2023, a lawyer who wishes to practice law in Nigeria must participate in and satisfy the requirements of the mandatory CPD programme operated by the NBA.[24] This provision makes CPD participation a legal prerequisite for all legal practitioners seeking to maintain an active practice. In clear terms, a practising lawyer must fulfil CPD requirements every year; otherwise, they risk losing the legal competence to continue practising. The rule does not leave room for mere voluntary engagement; it explicitly ties CPD to the right to practice.

Further detail in Rule 11(2) clarifies the types of activities that count towards meeting this mandatory obligation. Lawyers are required to engage in activities that enhance professional competence, including attendance and participation in accredited courses, lectures, seminars, workshops, conferences on law approved by the NBA, writing on legal topics in approved books or journals, and other NBA-approved means of acquiring professional knowledge and experience. This broad scope shows that the Nigerian legal CPD framework recognises diverse methods of learning rather than limiting engagement to traditional classroom lectures.

To give operational effect to these CPD requirements, the NBA adopted the MCPD Rules, 2025. These rules were approved by the NBA's National Executive Committee (NEC) and implement the statutory mandate in Rule 11 of the RPC. The MCPD Rules create a clear compliance structure, including a minimum annual CPD requirement of five (5) credit hours for practising lawyers.[25] NBA-ICLE-accredited programmes are the authorised source of these CPD points, ensuring that learning activities meet rigorous standards set by the profession. The MCPD Rules further affirm that CPD is now a mandatory precondition for licence renewal and professional recognition in a given legal year. According to reports and the MCPD instrument itself, lawyers must obtain the minimum CPD hours *before* they can renew their practising certificates or obtain official NBA stamps and seals for the succeeding year.[26] Without compliance, a lawyer's licence to practise and official authentication tools may be withheld.[27] This linkage of CPD compliance to licence and seal issuance ensures that the requirement is not theoretical but a practical regulator of practice rights.

The RPC also reinforces these compliance requirements under Rule 12. This rule mandates the NBA to annually publish a list of legal practitioners who have complied with CPD and paid practising fees, thereby becoming entitled to practice in that year. A legal practitioner who does not appear on this annual list is legally barred from conducting court proceedings, signing or filing legal documents, or performing any professional act that characterises legal practice in Nigeria. This clear statutory consequence makes non-compliance a matter of legal disability rather than professional indifference.

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24 Rules of Professional Conduct for Legal Practitioners (RPC) 2023, Rule 11.

25 NBA, 'Nigerian Bar Association Introduces Mandatory Continuing Professional Development Rules' (*Nigerian Bar Blog*, 15 March 2025) <https://blog.nigerianbar.org.ng/2025/03/15/nigerian-bar-association-introduces-mandatory-continuing-professional-development-rules/> accessed 2 January 2026.

26 *Ibid.*

27 *Ibid.*

Significantly, the statutory framework also anticipates the institutional capacity to deliver and regulate CPD. Rule 11(5) of the RPC requires the NBA to establish a Continuing Professional Development Department

within its structure to administer the CPD programme. In practice, this role has been delegated to the NBA Institute of Continuing Legal Education (NBA-ICLE), the NBA's dedicated arm for professional education and training. NBA-ICLE is charged with accrediting CPD courses, tracking compliance, and reporting on practitioners' fulfilment of the annual CPD requirements.

This institutional empowerment is vital. It ensures that CPD is not merely aspirational but backed by an organised body with systems and processes to monitor participation, award credit hours, and enforce compliance. NBA-ICLE's role includes approving service providers, accrediting local branch programmes, and offering online platforms that make CPD accessible to all lawyers across Nigeria. The existence of such a body with clearly defined responsibilities illustrates that the legal framework treats CPD as core to professional competence and ethical obligation.

Critically, the legal framework deliberately balances mandate and flexibility. While participation is non-negotiable, lawyers are free to choose from a range of accredited activities to fulfil their annual obligations.[28] Moreover, the NBA leadership has emphasised that lawyers will not be forced into specific programmes or overcharged for CPD services; the obligation is to engage in approved learning in ways that fit individual practitioners' circumstances.[29] This flexibility preserves professional autonomy while still maintaining high standards of competence.

Another important element of the legal framework is transparency and accountability. The NBA is required to publish lists of compliant and non-compliant lawyers, enhancing public trust and internal discipline within the profession. Lawyers' CPD records are no longer private; they are matters of public professional standing.

5.Institutional Framework for Continuing Professional Development Programme in Nigeria

The institutional framework for CPD in the Nigerian legal profession is structured around key bodies that regulate, deliver, and enforce CPD requirements. The central institution is the NBA, whose role is mandated by the RPC. Under Rule 11 of the RPC, the NBA must operate and oversee the mandatory CPD programme for legal practitioners wishing to practice in Nigeria. The rule explicitly requires lawyers to participate in accredited CPD activities, including courses, seminars, workshops, publications, professional study, and other approved mechanisms to develop legal skills and knowledge. The NBA must also establish a CPD department to administer the programme and set guidelines, credit requirements, and exemptions.

Within the NBA, the NBA-ICLE serves as the primary operational arm for CPD implementation. The NBA-ICLE conducts, accredits, and tracks CPD activities for legal practitioners across Nigeria. It was formally empowered under the MCPD Rules, 2025, approved by the NBA National Executive Committee, pursuant to Rule 11 of the RPC. These MCPD Rules require every practicing lawyer to obtain a minimum of five CPD credit hours annually as a condition for practice licence renewal.[30] The NBA-ICLE's accreditation function

[28] ICLE, 'No Lawyer Will Be Compelled or Overcharged for CPD Courses – NBA President clarifies' (*BarristerNG.com,* 24 June 2025) https://barristerng.com/icle-no-lawyer-will-be-compelled-or-overcharged-for-cpd-courses-nba-president-clarifies/ accessed 2 January 2026.

[29] *Ibid.*

[30] NBA, (n 23) 1.

ensures that CPD activities meet quality standards and that participants receive valid credits that count toward annual requirements.[31]

The institutional role of NBA-ICLE goes beyond mere accreditation. It also provides training content, including live and online courses, seminars, and workshops tailored to contemporary legal challenges.[32] The NBA-ICLE manages an e-MCPD platform that gives lawyers flexible access to CPD modules online. This innovation allows legal practitioners to complete CPD requirements at their own pace and schedule, accommodating busy professional lives.[33] By doing so, NBA-ICLE functions as both regulator and service provider within the professional development space.

Crucially, the NBA-ICLE works closely with NBA Branches nationwide to expand CPD access. Branch committees can organise locally accredited CPD events, widening participation beyond major urban centres.[34] These local efforts are necessary because Nigeria's legal community is geographically dispersed, and centralised training alone cannot meet all practitioners' needs.

The Council of Legal Education (CLE) plays a complementary though less direct role. While the CLE primarily oversees legal education standards in law schools and the post-call Practical Training, its framework informs the broader culture of continuous legal learning.[35] The CLE's standards influence how CPD content aligns with foundational legal competencies, though it does not directly control CPD accreditation or enforcement policies.

Enforcement of CPD compliance is institutionalised through the Annual Practising Certificate (APC) regime. Under Rule 12 of the RPC, the NBA must publish an Annual Practising List only after confirming that a legal practitioner has met the CPD requirements and paid practising fees.[36] Lawyers who do not satisfy CPD obligations are denied the APC and therefore are prohibited from signing documents, conducting litigation, or filing legal instruments in that legal year.[37] This enforcement mechanism makes CPD compliance an institutional condition for active legal practice.

The NBA and NBA-ICLE also provide transparency mechanisms by publicly listing compliant and non-compliant lawyers.[38] This institutional strategy enhances accountability within the profession. Lawyers who

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31 *Ibid.*

32 ICLE, (n 26) 1.

33 *Ibid.*

34 NBA, 'NBA-ICLE CPD/CLE Points Allocation Guide' (*NBA Blog*, 22 June 2025) <https://blog.nigerianbar.org.ng/2025/06/22/nba-icle-cpd-cle-points-allocation-guide/> accessed 2 January 2026.

35 S.C. Udemezue, 'Resolving Conundrums Regarding Legal Profession Regulation in Nigeria' (*Nigerian Journals Online*, nd) <https://www.nigerianjournalsonline.com/index.php/IRLJ/article/viewFile/2990/2905> accessed 2 January 2026.

36 RPC, Rule 12.

37 *Ibid.*

38 NBA, 'Mandatory Compliance with New NBA-ICLE MCPD Rules for Practice Licence Renewal' (*NBA Blog*, 29 May 2025) <https://blog.nigerianbar.org.ng/2025/05/29/mandatory-compliance-with-new-nba-icle-mcpd-rules-for-practice-licence-renewal/> accessed 3 January 2026.

fall short are easily identified, which reinforces the importance of ongoing development and professional responsibility.

Institutionally, the Nigerian framework for CPD reflects global standards of professional regulation, where CPD is a recognised pillar of legal practice excellence. The NBA's unwavering commitment to enforcing CPD, even against resistance, underscores its belief that lifelong learning strengthens professional competence, ethical standards, and public confidence in legal services. Through NBA-ICLE, NBA Branches, and structured enforcement via practising certificates, the institutional framework ensures that CPD is not just aspirational but compulsory and actionable.

6.**Literature Review**

Gold and colleagues,[39] argue that continuing professional development should be rooted in actual professional practice rather than classroom-style learning alone. Their study shows that CPD is most effective when lawyers learn through reflection, experience, and problem-solving in real work situations. This position is persuasive because legal practice is dynamic and cannot be fully addressed through theory-based seminars. However, the authors focus largely on developed jurisdictions and assume the existence of strong institutional support. This limits direct application to Nigeria, where infrastructure and access remain uneven. Nonetheless, the work strongly supports this study's argument that CPD should be practical, relevant, and skill-driven rather than formalistic.

Nnawulezi and Nwaechefu[40] provide a detailed argument in support of mandatory continuing legal education in Nigeria, especially in light of cross-border legal practice. They correctly identify gaps in the competence of Nigerian lawyers operating in international and commercial spaces. Their proposal for a harmonised and internationally informed CLE framework advances this study by showing that CPD is no longer optional in a globalised legal market. However, the authors give limited attention to enforcement problems and cost burdens faced by young and rural lawyers. This omission weakens their otherwise strong position. Still, the article is valuable in framing CPD as a tool for competitiveness and professional relevance.

Daniel-Ebune and Joda[41] examine CPD compliance among pharmacists in Nigeria and reveal low participation despite formal requirements. Their findings are important because they show that mandatory CPD alone does not guarantee competence or engagement. Factors such as cost, time constraints, and weak monitoring reduced effectiveness. Although the study focuses on pharmacists, its conclusions apply directly to the legal profession. It strengthens this paper's argument that CPD can become a burden if poorly implemented. The work is particularly useful in demonstrating that professional regulation without practical incentives and support structures often fails. It provides a strong comparative basis for assessing CPD challenges in Nigerian legal practice.

Schein[42] critically questions whether mandatory continuing legal education genuinely improves lawyer competence or merely serves public relations purposes. He argues that many CLE programmes prioritise

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39 J. Gold *et al.*, "Continuing Professional Development in the Legal Profession: A Practice-Based Learning Perspective" (2007) 38 *Management Learnin*g 235–250.

40 Nnawulezi and H. Nwaechefu, (n 4).

41 E.O. Daniel-Ebune and A.E. Joda, "Assessment of Continuing Professional Development Activities among Pharmacists in Nigeria" (2017) 28 *West African Journal of P*harmacy 119–128.

42 D.D. Schein, 'Mandatory Continuing Legal Education: Productive or Just PR?' (*Georgetown Journal of Legal Ethics*, 2020) <Mandatory Continuing Legal Education: Productive or just PR?> 3 January 2026

attendance over learning outcomes. This critique directly supports the "thorn" side of this study's inquiry. The strength of the article lies in its honesty and evidence-based skepticism. However, Schein's analysis is

largely US-focused and does not fully consider developing jurisdictions where baseline professional training gaps are wider. Despite this, the article is highly relevant because it warns regulators against treating CPD as a box-ticking exercise. It reinforces the need for outcome-based and skill-focused CPD reform in Nigeria.

Karas and colleagues[43] analyse CPD requirements for health professionals in the UK and highlight a shift from hours-based compliance to reflective and outcome-focused learning. [5] Their findings are useful for this study because they show how strong regulation, digital tracking, and professional accountability improve CPD effectiveness. The article demonstrates that CPD works best when professionals take ownership of their learning rather than merely meeting quotas. Although the context is healthcare, the regulatory lessons are transferable to legal practice. This study supports the argument that Nigeria must move beyond attendance-based CPD toward measurable competence and reflective practice if CPD is to function as a true professional tool.

Eromosele and Erikume[44] examine CPD through the lens of knowledge sharing among Nigerian law librarians. They argue that informal learning, peer collaboration, and access to updated legal information are effective forms of professional development. This work advances the present study by showing that CPD does not always require expensive formal programmes. It is particularly relevant to Nigeria, where financial and geographical barriers exist. However, the article focuses on a niche professional group and does not fully engage with regulatory enforcement. Still, it provides a practical and locally grounded perspective that supports a more inclusive and flexible CPD framework for Nigerian lawyers.

Filipe and colleagues[45] identify global best practices in continuing professional development, including relevance, accessibility, evaluation, and learner motivation. Their work clearly shows that CPD fails when it is rigid, expensive, and disconnected from professional needs. Although written in the context of medical professions, the principles apply directly to law. This article strengthens the argument that CPD should be designed around competence and service quality, not punishment. Its limitation lies in its age, but the core principles remain valid. The study supports this paper's position that CPD becomes a thorn when best practices are ignored.

7.**Comparative Perspectives on CPD Engagement in Selected Jurisdictions**

7.1United Kingdom (UK)

In the United Kingdom, continuing professional development for legal practitioners is structured, mandatory, and centred on competence. The Solicitors Regulation Authority (SRA) and professional bodies require solicitors to engage in CPD that goes beyond ticking boxes. These schemes emphasise reflective learning where a solicitor must assess what they learned and how it improves their practice. This reflective approach helps lawyers identify real gaps in competence rather than simply meeting a set number of hours.[46]

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43 M. Karas, *et al.* "Continuing Professional Development Requirements for UK Health Professionals: A Scoping Review" (2020) 10(3) *BMJ Open* e0327815.

44 Eromosele and Erikum (n 15) 1.

45 H.P. Filipe *et al.*, "Continuing Professional Development: Best Practices." (2014) 21(2) *Middle East Afr J Ophthalmol* 134-141.

46 Law Society of England and Wales, 'Continuing Competence' <https://www.lawsociety.org.uk/en/career-advice/career-development/continuing-competence/> accessed 3 January 2026.

The Law Society of England and Wales provides tools like a CPD diary to enable solicitors to record, reflect on, and plan professional development activities. The diary is an official platform which demonstrates compliance and helps lawyers communicate their learning to employers and clients.[47] Such tools encourage lawyers to think about development as part of everyday practice rather than as an annual requirement.

Different legal professionals in the UK face varying CPD requirements. For example, solicitors must meet specific hour targets and hold records of courses attended.[48] The system is designed to hold professionals accountable; non-compliance can delay the renewal of practising certificates or lead to disciplinary scrutiny.[49] This strong regulatory backing means CPD is linked firmly to professional credibility. What makes the UK model effective is its focus on outcomes and competence. Lawyers are expected not only to complete activities but also to explain how these activities improve their capability to serve clients or manage their practices.[50] This approach has global relevance because it aligns ethical duties to clients with continual learning. For jurisdictions like Nigeria, the UK's model shows that CPD should measure the effect on practice quality, not just attendance figures.

The UK's structure also recognises that development happens through different methods, including online courses, reflective practice, formal classroom sessions, and seminars.[51] This variety increases access and flexibility for professionals at all career stages. The UK model also emphasises professional responsibility and ethical awareness through structured CPD content, which strengthens lawyers' ability to uphold standards in changing legal landscapes.[52]

7.2 Canada

Canada's CPD regime for lawyers varies by province, but overall, it exhibits a clear annual requirement and a mix of substantive and professionalism-based learning. In Ontario, for example, practising lawyers must complete at least 12 hours of CPD per calendar year. This includes a minimum of three professionalism hours, covering ethics, professionalism, and practice management, and a further component focused on Equality, Diversity, and Inclusion (EDI).[53]

The Ontario model is significant because it explicitly incorporates ethical and professional conduct into the annual CPD requirement. Lawyers and paralegals must not only enhance their substantive legal knowledge but also engage with professional and ethical issues, including EDI topics.[54] This reflects an understanding that legal competence includes behaviour and professional responsibilities, not only legal knowledge.

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47 Law Society of England and Wales, 'Continuing competence – CPD Diary' <https://www.lawsociety.org.uk/learning/> accessed 3 January 2026.

48 The CPD Certification Service, 'Legal CPD Requirements in the UK' <https://www.cpduk.co.uk/industries/legal> accessed 3 January 2026.

49 *Ibid.*

50 Law Society of England and Wales, (n 44).

51 *Ibid.*

52 The CPD Certification Service, *Ibid.*

53 Law Society of Ontario, 'Continuing Professional Development Requirement' <https://lso.ca/lawyers/enhancing-competence/continuing-professional-development-requirement> accessed 3 January 2026.

54 Law Society of Ontario, (n 51).

The requirement for accredited professionalism hours is also crucial because it ensures certain activities are evaluated and assessed for quality.[55] Accreditation adds a level of assurance that lawyers are engaging in meaningful learning rather than undertaking informal or unverified activities.

Across Canada, other provinces like British Columbia and Nova Scotia operate similar systems where lawyers must report their professional development annually and meet set CPD minimums.[56] Although CPD rules are not identical across provinces, the common principle is that legal professionals must demonstrate ongoing learning that covers legal, ethical, and practice-management topics.[57]

Canada's framework has strengths in its balance between technical legal learning and broader professional skills. Lawyers must plan their CPD activities in a way that integrates ethical growth with legal expertise, and this approach recognises the complex nature of modern legal practice. This combined focus ensures lawyers are not only legally competent but also mindful of professionalism and respect for clients, colleagues, and the public.

For jurisdictions considering reforms, the Canadian approach highlights the importance of mixing technical legal updates with professionalism and ethics content, thereby producing well-rounded practitioners capable of handling legal and societal expectations.

7.3South Africa

South Africa's legal profession has taken steps toward CPD, though full statutory implementation of CPD for attorneys and advocates is evolving. The Legal Practice Council (LPC), established under the Legal Practice Act, is the statutory body responsible for regulating legal practice, including the promotion of CPD.[58] Currently, the LPC's regulatory framework mandates standards for legal practice and competence, with CPD positioned as part of professional development and the maintenance of standards.[59]

Historically, the Law Society of South Africa (LSSA) managed CPD through its Mandatory Continuing Professional Development (MCPD) policy. Attorneys were required to maintain records of CPD points over multi-year cycles as part of re-certification and professional standing.[60] This system emphasised participation in activities such as attending conferences, delivering legal papers, mentoring, and engaging with educational meetings — all designed to enhance legal knowledge and skills.[61]

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55 *Ibid.*

56 Blake, Cassels & Graydon LLP, 'CPD/CLE Requirements' <https://www.blakes.com/insights/seminars/cpd-cle-requirements/> accessed 3 January 2026.

57 *Ibid.*

58 Legal Practice Council (South Africa), 'Legal Practice Council' <https://lpc.org.za/> accessed 3 January 2026.

59 Studocu, *'Describe the purpose of the South African Legal Practice Council'* <https://www.studocu.com/en-za/messages/question/3125607/describe-the-purpose-of-the-south-african-legal-practice-council> accessed 3 January 2026.

60 Republic of South Africa, 'Mandatory Continuing Professional Development (MCPD) Policy' (*Government Gazette No 38689, vol 598,* 13 April 2015) <https://archive.opengazettes.org.za/archive/ZA/2015/government-gazette-ZA-vol-598-no-38689-dated-2015-04-13.pdf> accessed 3 January 2026.

61 *Ibid.*

The South African CPD environment reflects a transitional phase where statutory regulation and voluntary practices overlap. The LPC's broader mandate under the Legal Practice Act includes promoting continuous professional development as part of maintaining competence.[62] Although specific numerical requirements like fixed CPD hours per year are not uniformly applied nationwide through LPC rules yet, the emphasis remains on upholding standards, ethical practice, and professional improvement.[63]

What is clear from South Africa's experience is that CPD's acceptance is increasing, and stakeholders recognise its role in addressing the dynamic legal environment. Lawyers must adjust to changes in law, client expectations, technological shifts, and ethical challenges. South Africa's framework suggests a hybrid approach, combining statutory oversight with professional body initiatives that encourage lawyers to engage voluntarily in meaningful development.

South Africa's CPD scene also shows that professional development must recognise local realities such as resource differences, practice contexts, and access issues, especially for lawyers in underserved areas. A balanced system should build competence without imposing undue financial or time burdens that could marginalise parts of the profession.

Across the UK, Canada, and South Africa, CPD systems share the belief that lawyers must continuously update their skills and knowledge. The UK model is outcomes-focused and holds lawyers accountable through reflective records and regulatory oversight. Canada's framework balances technical law skills with professionalism and ethical learning, ensuring lawyers grow in character as well as competence. South Africa is increasingly integrating CPD into statutory regulation, recognising the need for continuous improvement while balancing professional realities.

These jurisdictions demonstrate that CPD can be framed not as a burden but as an essential tool that reinforces ethical practice, public trust, and professional quality. Their experiences offer valuable lessons for jurisdictions like Nigeria, where CPD frameworks continue to develop and where the legal profession must guard both competence and access to justice.

8.**Is CPD a Tool or a Thorn in the Legal Profession?**

CPD has become a central regulation in many legal systems, including Nigeria's recent Mandatory CPD Rules introduced by the NBA. The fundamental purpose of CPD is to ensure that lawyers keep pace with changes in the law, practice technologies, professional ethics, and service-delivery expectations.2In that sense, CPD is clearly a *tool* that helps lawyers maintain competence, adapt to evolving work environments, and ultimately improve the quality of legal services provided to clients. These are strong and direct benefits: lawyers who regularly engage in professional development are better prepared for complex legal issues and can offer more informed and effective representation. The dynamic nature of legal practice, where statutes, judicial interpretations, and procedural rules shift constantly, means that lawyers who neglect ongoing learning risk becoming outdated.[64]

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62 Studocu, *Ibid.*

63 Legal Practice Council (South Africa), *Ibid.*

64 A. Kellerhals, M. Mayer and J. Elsener (eds), *Continuing Legal Education: Ambition and Reality* (EIZ Publishing, 2023) 21.

However, the framing of CPD as a useful tool must be carefully balanced against the real *thorn* that compulsory CPD can become if not properly structured and implemented. Research and professional experience across jurisdictions show that CPD can degenerate into a box-ticking exercise, designed more to satisfy regulatory requirements than to foster genuine learning. When lawyers are required to complete fixed numbers of hours or credits without regard to relevance or quality, the focus can shift from meaningful professional learning to compliance for compliance's sake. This problem is especially acute when CPD programmes are poorly tailored to practitioners' needs, rigid in content, or dominated by administrative checklists rather than substantive engagement with actual legal practice challenges.[65]

Moreover, there are significant practical barriers that transform CPD from a tool into a thorn for many legal practitioners. One of the most commonly cited issues is the financial burden associated with CPD participation. Lawyers often face high registration fees, travel costs, and time away from billable or productive work when attending CPD events. In contexts where lawyers operate in small firms or solo practice, these costs may disproportionately affect younger and less established practitioners, making CPD feel more like a resource-draining obligation than a useful professional enrichment opportunity. Time constraints are also a persistent problem; busy legal professionals may struggle to balance demanding workloads with CPD requirements, which can erode the perceived value of such programmes if they are seen as interruptive rather than integrative to practice.[66]

In some jurisdictions, these challenges have led to widespread skepticism toward mandatory CPD, with commentators describing it as an administrative burden or even a waste of resources. Critiques from legal communities highlight that when CPD is treated primarily as a compliance requirement, lawyers may attend sessions merely to secure credits rather than to acquire knowledge or enhance practice. Without mechanisms to ensure quality, relevance, and practitioner engagement, CPD risks prioritising quantity over the actual professional learning that it is meant to promote.[67]

Nevertheless, these thorn-like aspects do not negate the core value of CPD as a professional tool where it is thoughtfully designed and implemented. Effective CPD should be flexible, relevant, and accessible, addressing substantive developments in law and practice while accommodating diverse professional contexts.[68] When CPD programmes allow lawyers to select learning activities that directly relate to their specialised fields, incorporate interactive and practical components, and respect practitioners' time and financial realities, they are far more likely to be embraced as meaningful tools for competence and development.

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65 Legal Services Consumer Panel, 'Legal Education and Training Review: Submission' (*LETR Submission,* 2012) <https://www.legalservicesconsumerpanel.org.uk/publications/consultation_responses/documents/2012-05-21LETRsubmission.pdf> accessed 3 January 2026.

66 D. McGuire *et al.*, "Continuing Professional Development in the Irish Legal Profession: An Exploratory Study" (2001) 4(2) *Continuing Professional Development* 1-27.

67 L. Peter, "Mandatory Continuing Legal Education: Productive or Just PR?" (2020) 30(5) *Georgetown Journal of Legal Ethics* 500–525.

68 Gold *et al.*, (n 37) 240.

9.**Summary of Findings**

This study finds that CPD plays an important role in improving the quality of legal practice in Nigeria. CPD helps lawyers keep up with changes in the law, new court procedures, and emerging areas of practice. In a profession where laws and judicial decisions change regularly, ongoing learning supports competence, professionalism, and public confidence in lawyers. From this perspective, CPD clearly serves as a useful tool for strengthening the Nigerian legal profession.

The findings also show that the mandatory nature of CPD has helped to increase participation among lawyers who might otherwise ignore professional training after being called to the Bar. By linking CPD compliance to the renewal of practising licences and seals, the NBA has created a system that encourages accountability and continuous learning. This aligns Nigeria with global best practices, where CPD is widely recognised as a core element of professional regulation.

However, the research equally reveals that CPD presents serious challenges for many legal practitioners. High registration fees, travel costs, and limited access to quality training programmes make compliance difficult, especially for young lawyers and those practising outside major cities. For these lawyers, CPD is often viewed as a financial burden rather than a meaningful learning opportunity. There are also concerns that some CPD programmes focus more on meeting formal requirements than on practical skills that improve everyday legal work.

Comparative insights from other jurisdictions show that CPD is most effective when it is flexible, affordable, and closely connected to real legal practice. Where CPD is treated only as a box-ticking exercise, its impact on professional competence is limited.

Overall, the findings suggest that CPD in Nigeria is both a tool and a thorn. It is a tool because it promotes competence and professionalism. It becomes a thorn when poor implementation, high costs, and limited relevance reduce its value. The effectiveness of CPD therefore, depends largely on how it is designed and delivered.

10.**Conclusion and Recommendations**

CPD is meant to ensure that lawyers remain competent, informed, and relevant in a fast-changing legal environment. Law is no longer static. New legislation, judicial decisions, technology, and global best practices constantly reshape legal practice. In this sense, CPD is clearly a tool, not a thorn. Where lawyers engage meaningfully with CPD, it improves advocacy skills, ethical awareness, and professional confidence. It also protects the public by ensuring that legal services meet acceptable standards.

However, the Nigerian CPD system has significant weaknesses that make many practitioners view it as a burden rather than a benefit. The programme is often reduced to a box-ticking exercise focused on earning credit hours instead of building real skills. Many CPD activities are repetitive, theoretical, and disconnected from the daily realities of legal practice. Cost is another major concern. High registration fees, travel expenses, and concentration of programmes in major cities unfairly disadvantage young lawyers, rural practitioners, and those in small firms. Weak enforcement and inconsistent sanctions also undermine the credibility of the system.

Based on these findings, several recommendations are necessary. First, CPD content must be restructured to focus on practical skills such as advocacy, drafting, negotiation, technology use, ethics, and emerging areas of law. Second, the Nigerian Bar Association should expand online and low-cost CPD options to ensure equal

access for all lawyers, regardless of location or income level. Third, CPD requirements should be more flexible, allowing lawyers to tailor learning to their specific areas of practice. Fourth, enforcement mechanisms should be transparent and consistent, so that compliance is taken seriously without being punitive. Finally, regular feedback from lawyers should be institutionalised to ensure that CPD programmes respond to real professional needs.

In conclusion, CPD in Nigeria should not be abolished or ignored. When properly designed and fairly implemented, it remains a powerful tool for strengthening the legal profession. The task before regulators is not to defend CPD blindly, but to reform it honestly so that it truly serves lawyers, the justice system, and the public.