

Review Article

Managing Legal Education for Effective Training of Nigerian Lawyers

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Abstract: The Council of Legal Education is the statutory body with the responsibility for the legal education of persons seeking to become members of the legal profession in Nigeria, and it has the additional responsibility for continuing legal education. Also, there is the National Universities Commission that has the overall responsibility for the regulation of university education and empowered to set the minimum standards for all programmes in Nigerian universities. This paper examines the management of legal education in Nigeria, an aspect of legal education system that has not been addressed by either the Council of Legal Education, the National Universities Commission, or any of the other stakeholder in the development of the legal profession in the nation. The paper makes references to the practices in the United States of America and The United Kingdom of Great Britain, appraises the operation and performance of the Council of Legal Education, and makes recommendation for the effective management of legal education in Nigeria for effective training of the lawyers for tomorrow. The methodology adopted for the research leading to this paper is doctrinal, drawing from content analysis of primary sources such as statutes, case laws as well as secondary sources such as scholarly texts, websites, and journal articles.

Keywords: Lawyers, Legal Education, Management, Standards, Training

1. Introduction

Since 1959 when the Federal Government of Nigeria constituted the Committee on the Future of the Nigerian Legal Profession (The Unsworth Committee), chaired by Edgar Ignatius Godfrey Unsworth,¹ discussions and recommendations have been on pre-qualification for law study, law courses, content of law courses, ethics and professionalism, entrepreneurial and managerial skills, experiential learning, and discipline. No attention has been

paid to the management of the training and development structure. The previous discussions of the subject include national conferences [1], committees [2, 3], summits [4] by the Nigerian Bar Association (NBA),² and publications by scholars [5-7]. The Unsworth Committee Report, 1959 [2] on which the current structure is based, did not address the question of management of the training structure and did not sufficiently address management of the accreditation process. If the focus remains how to improve the structure created by the Unsworth Committee Report and its implementation without addressing or resolving the management structure

¹ Sir Edgar Ignatius Godfrey Unsworth, KBE, CMG, QC (18 April 1906 – 15 March 2006) was a British lawyer and judge. He was called to the Bar in 1930 and was in private practice from 1930 to 1937 before accepting the post as a Crown Counsel in Northern Nigeria. He afterwards served as Attorney-General of Northern Rhodesia (1951–56) and of the Federation of Nigeria (1956–60). He chaired the committee on the Future of the Nigerian Legal Profession in 1959 before serving two years as Justice of the Federal Supreme Court of Nigeria. He was Chief Justice of Nyasaland (1962–64) and was appointed Chief Justice of Gibraltar in 1965. See https://en.wikipedia.org/wiki/edgar_unsworth (accessed on 28/07/2022).

² Legal Education Summit 2006 held in Abuja on March 03, 2006, under the theme: “The Future of Legal Education in Nigeria”. 2008 NBA Legal Education Review Committee, headed by Mrs. Funke Adekoya, SAN. August 2015 Annual General Conference of the Nigerian Bar Association at Abuja, Nigeria, the 52nd Conference of Nigerian Association of Law Teachers held from July 1-6, 2019, at the University of Ibadan, Ibadan Nigeria with a session on Repositioning Legal Education in Nigeria, and the March 2022 Legal Education Summit with the theme Reimagining Legal Education in Nigeria, at Afe Babalola University, Ado-Ekiti, Ekiti State, Nigeria.

with specific attention paid to the independence and management of the Council of Legal Education, not much will be achieved.

The focus in this paper is the management of legal education, the appropriate role of the Council of Legal Education (CLE) and how the CLE should be organized and managed to play effective role in ensuring that it trains and grooms lawyers for today and tomorrow's needs. Effort in this direction will be easier if general law reform focuses on the challenges which the legal education reform process encounter, and the proposed mitigation strategies applicable to the legal education management system [8].

2. CLE and NUC as Regulators of Legal Education and Training in Nigeria

The CLE is the statutory regulatory body for legal education in Nigeria, including the training offered by the Nigerian Law School (NLS) while the National Universities Commission (NUC) [9] has overall responsibility for regulating and setting minimum standards for all universities and university courses. The Court of Appeal in *NUC v. Alli & Anor*³ reemphasized the "power of the Council of Legal Education and the National Universities Commission to grant approval or otherwise for accreditation of a Faculty of Law in Nigeria Universities" UWA, J. C. A⁴ observed that "...from the provisions of the laws, the accreditation of a Faculty of Law in Nigeria is the requisite approval granted by the NUC (Appellant) and the Council of Legal Education (CLE) by virtue of S. 1(2) of the Legal Education (Consolidation, etc.) Act. It is a mandatory responsibility by its wordings: "The Council SHALL have responsibility for the Legal Education of persons seeking to become members of the Legal profession." While Section 4 (b) (i) and (iii) of the National Universities Commission Act and Section 10 of the Education (National Minimum Standards and Establishment of Institutions) Act both confer on the Council of Legal Education the responsibility in Section 1 (2) of the CLE Act. The Court held that above laws empower the Appellant (NUC) to approve or disapprove new academic units/programmes and lay down the required minimum academic standards and conduct accreditation exercises following the guidelines stipulated in the various laws.

The CLE is established by Legal Education (Consolidation, etc.) Act.⁵ The Act re-enacts the Legal Education Act 1962 as amended up to 8th of March 1976, and it introduced new provisions relative to the composition of the CLE and the appointment of the Director-General of the NLS. The expectations from the CLE should not be limited to Legal

Education in the universities and the NLS, but also in the maintenance of standards and quality assurance post-Call and Enrolment. CLE has the statutory responsibilities amongst other responsibilities to lay the solid foundation upon which can be built effective continuing professional development, gateway to maintenance of standards, monitoring, evaluation, and quality assurance in the legal profession.

The CLE has responsibility for the legal education of persons seeking to become members of the legal profession.⁶ It also has responsibility for those matters in respect of which, before the commencement of this Act, the Nigerian Institute for Continuing Legal Education had responsibility.⁷ Incidentally, the only continuing legal education programme in Nigeria is the programme run by the Nigerian Bar Association Institute of Continuing Legal Education (ICLE). Nigerian Lawyers in legal practice and in private of public corporate employment are required to comply with the NBA Mandatory Continuing Legal Education (MCLE) Programme, to remain in practice in Nigeria. The ICLE serves as the CLE regulatory authority for continuing education in the legal profession.⁸

Though the CLE by law is the statutory regulatory body for legal education in Nigeria, including the training offered by NLS, what happens *de facto* is that the NLS handles and manages the accreditation process and quality control process in the faculties and colleges of law on behalf of the CLE. In this regard, the NLS functions as the secretariat and the operational arm of the CLE. The CLE as a body meets from time to time to ratify what the NLS has done on its behalf. CLE cannot do better than it is doing now, and as it has done in the past because of its structure, organisation, and management. The structure and *modus operandi* worked fairly well when the number of universities offering law and awarding the first degree in law increased from four in 1962 to seven by 1975.⁹ Then, the NLS served fairly satisfactorily as the secretariat and nerve centre of CLE, and both the Director General (DG) of the NLS and the Director of Administration of NLS, who was and is still Secretary of CLE drove the process. With only one campus of Nigerian Law School in Lagos, and a student population of about 600 in 1975, the DG and the Secretary could cope with the additional responsibilities of the CLE. However, there was no other organisation established to regulate and monitor the quality of NLS staff, curriculum and quality of lectures delivered. Now, with seven campuses of NLS having about 7,000 or more students, and over 70 universities accredited to admit students for law, CLE cannot function effectively or satisfactorily as a regulatory body if it continues to depend on the DG and Director of Administration of NLS for the performance of its

³ (2013) LPELR-21444.

⁴ Ibid at Pp. 72-76 paras. F

⁵ Section 1 (1) Legal Education (Consolidation, etc.) Act Chapter 206, Laws of the Federation of Nigeria. The Act repeals the Legal Education Act 1962; the Legal Education (Pensions) Act 1965; the Legal Education (Amendment) Act 1970; the Legal Education (Amendment) Act 1973 and the Legal Education (Amendment) Act 1974.

⁶ Section 1 (2).

⁷ Section 3.

⁸ The National Executive Committee of the Nigerian Bar Association at its meeting of 15th February 2007 at Owerri, Nigeria, approved the "Mandatory Continuing Legal Education Rules (MCLE Rules)" pursuant to Rule 11 of the Rules of Professional Conduct for Legal Practitioners 2007.

⁹ University of Nigeria, University of Ife, Ahmadu Bello University, University of Lagos, University of Benin, University of Maiduguri, and University of Calabar

statutory regulatory role. Each of the campuses of NLS is bigger than many private universities. Even the smallest campus of NLS is bigger than some private universities. The campuses have more students than many private universities and some public universities.

There is quite a lot on the plate of the NLS in terms of managing the campuses and dealing with the training and coaching of prospective legal practitioner. This includes giving them what they need in terms of skills and solid foundation for ethics and professional conduct prior to Call to Bar and enrolment as legal practitioners. The management of NLS has more than enough to cope with, and probably not enough resources to operate effectively and at its optimum. The DG and Director of Administration of NLS should no longer be saddled with the responsibilities of the CLE. They should be allowed to concentrate on managing the NLS and ensuring that world-class standards are set, and quality of learning and development of young lawyers is sustained at the optimum. The CLE should play its role as the regulator and quality assurance monitor of NLS.

An allied matter is the centralization of the management and regulation of legal education and the legal profession in Nigeria, including centralization of the discipline of legal practitioners. The CLE, a federal government creation, and the Body of Benchers¹⁰ another national body are responsible for both the training and admission of persons to practice law in the territory of Nigeria, a federal republic with thirty-six states and a federal capital territory. There is also national centralized Legal Practitioners Disciplinary Committee,¹¹ a committee of the Body of Benchers with jurisdiction over the territory of Nigeria, and over all legal practitioners of the Supreme Court of Nigeria. This centralization in a federal republic is a matter of concern, especially with the level of delays in adjudicating over the many discipline cases by the single national Legal Practitioners Disciplinary Committee, and challenges associated with the management of legal education and the centralization of the training and admission of persons to practice law in all states of the nation.

Before the Unsworth Committee and its report, establishment of the NLS and CLE, the lawyers in Nigeria, a common law country whose legal system has been describes as “an uneasy and uncertain amalgamation of rules derived from the laws of England, and rules elaborated on the spot by legislation or judicial pronouncement” [10], were trained in England. Each lawyer attended any one of the four different Inns of Court¹² for training and Call to Bar for the barristers, and the Law Society for Solicitor training and license. There was no centralized training for lawyers. Each person was at

liberty to attend any of the Inns of Court, before return to Nigeria and enrolment in the Supreme Court as a legal practitioner in a fused practice as barrister and solicitor. The Unsworth Committee advocated a single national training and management of the legal profession. Some of the recommendations of the committee were summarized as follows: -

- (1) That the profession should continue to be a fused profession in which practitioners may practise as both barristers and solicitors.¹³
- (2) That Nigeria should establish its own system of legal education.¹⁴
- (3) That on the establishment of such a system the existing qualifications should no longer by themselves be qualifications for admission to practise in Nigeria though they should be taken into account for the purpose of exemption from some of the subjects for Nigerian examinations.¹⁵

The system of legal education established based on the October 1959 recommendations of the Unsworth Committee has remained the same for over sixty-two years even when it is obvious that there is need for radical changes for the system to be properly placed to produce lawyers that can function and render satisfactory service in a digital world.

3. Some Other Jurisdictions

In the United States of America (USA), the respective fifty states supreme courts regulate the admission of lawyers to practice law. There is no single national authority for regulation of law practice, including attorney liens and attorney office requirements, among other matters [11]. There are states regulatory agencies, states discipline commissions or discipline committees with each having limited jurisdiction to the state and over all lawyers whether practicing in federal or state courts.

In the United Kingdom, there is also no single regulatory body for legal education or the legal profession. In England and Wales, and Northern Ireland where the system is based on Common Law,¹⁶ there is the Bar Council as regulatory and governing body for barristers, and the Law Society as regulatory and governing body for Solicitors. In Scotland where they have a hybrid of Common Law and Civil Law, the governing and regulatory body is the Scottish Law Society. These professional regulatory bodies in the United Kingdom issue guidelines for vocational training necessary for

¹⁰ Established by Section 3 (1) of the Legal Practitioners Act, 1962, Cap. L11 Laws of the Federation of Nigeria, 2004, a federal law. Section 10 (1) of the Legal Practitioners Act provides that the Body of Benchers shall be responsible for the formal call to the Bar of persons seeking to become legal practitioners of the Supreme Court of Nigeria.

¹¹ Established by Section 11 (1) of the Legal Practitioners Act, Cap. L11 Laws of the Federation of Nigeria, 2004, a federal law. It is a committee of the Body of Benchers.

¹² The Inns of Court are composed of Gray's Inn, Lincoln's Inn, Middle Temple, and Inner Temple.

¹³ Paragraph 12.

¹⁴ Paragraph 18.

¹⁵ Paragraph 18.

¹⁶ Common Law is a system developed over hundreds of years based on precedents (judicial decision) and customary law. On the other hand, Civil Law in the United States of America, refers to court cases that arise over a dispute between two non-governmental parties. In other jurisdictions, civil law is a legal system built upon Corpus Juris Civilis, the Justinian Code which originated in Rome in the sixth century. Most countries in Western Europe have the civil law system. Louisiana is the only state in the USA that follows the civil law tradition because to its French heritage. (Elizabeth Spitzer, “What is Civil Law? Definition and Examples”. Thought Co, Datdash Meredith Publishing, January 12, 2020)

qualification as practicing lawyers. They are also responsible for formulating the curriculum for law programmes in the universities and law schools [12].

In both the United Kingdom and the United States of America, the national government is not involved in the direct regulation of legal training and the legal profession, and the governments are not involved in the management or control of the regulatory bodies. Similarly, quality of legal education and practice is maintained not by the national government or government-controlled agencies in the UK or the USA but by independent professional bodies.

The system and process of quality assurance for legal education in the universities and law schools in the UK, is the same as for other disciplines [12]. It is to some extent like the role the National Universities Commission plays in Nigeria, but unlike Nigeria, there are several institutions for this in the UK. There is the Quality Assurance Agency for Higher Education (QAA) an independent body. QAA “checks on standards and quality in UK higher education. It conducts quality assessment reviews, develops reference points and guidance for providers, and conducts or commissions research on relevant issues” [12]. Also, QAA monitors how universities, colleges, and alternative providers of higher education in the UK maintain their academic standards and quality [12]. It sets standards and benchmarks for awarding all degrees at all levels, including law.

There are also the Institute of Teaching and Learning (ITL) in several universities in the UK.¹⁷ These are academic centres that support “teaching quality embed innovative teaching methods and lead on university-wide strategic projects”¹⁸ available to all academic staff of all disciplines and professions, including law and they are independent of government. It is a continuous development programme for university teachers run across the UK by the universities. This is not a mandatory practice, but it has been accepted as a necessary requirement for effective teaching and learning practice in the universities.

The important thing to note in designing the appropriate management model for legal education in Nigeria is the necessity to focus on the design of curriculum that prepare the law students for law practice tomorrow, and a process that ensures that the teachers are well equipped both in knowledge, practice and delivery styles and techniques. There is a lot to learn from the practice in both the USA and the UK in redesigning the management of legal education for effective teaching, even if the CLE is to continue to be the single national regulatory body for legal education, and the National Universities Commission (NUC) [9] the overall national

establishment for the regulation of university education. Though the NUC is empowered to “lay down the minimum standards for all programmes taught in Nigerian universities”,¹⁹ the respective university law colleges and faculties, and the Nigerian Bar Association should play well structured roles in management of training and retraining of lawyers.

4. Management of Council of Legal Education

The CLE like any other statutory regulatory body ought to have its own independent functional office with appropriate staff, like the NUC. Such staff to include a chief executive officer, and functional directorates with the compliment of full-time senior and junior staff. It should operate outside the NLS and should be in a position to effectively regulate both the NLS and the law faculties and colleges. The chief executive officer of the CLE proposed here with the directors of the new CLE should play the law faculty accreditation role that the NLS Director-General and NLS Director of Administration have played on behalf of CLE over the decades. The new CLE should be capable of monitoring the NLS, set and assess the standard of the curriculum of NLS and the quality of its staff and professional training. It is time something is done to properly establish the CLE as a separate institution like the NUC. The CLE should be set up to be capable of setting the minimum global standard of the curriculum and training methods of both the NLS and university law faculties. Its functions can include collaborating with Nigerian Bar Association Institute of Continuing Legal Education (NBA-ICLE) in setting the standards and delivering modules in the programme for continuing legal education and monitoring the same.

The on-campus training of Barristers and Solicitors should be sustained in the meantime, until when the nation is restructured as a nation with federating states that have appropriate autonomy including autonomy over the management and full control of the legal profession. Until then, the multi-campus system of the NLS should be continued with the seven campuses in Abuja, Lagos, Kano, Enugu, Yenagoa, Yola and Port Harcourt. The facilities in all the campuses should be continuously improved and appropriate level of staffing maintained and sustained. Nigeria does not need more than the present number of law schools. Funds should be provided for improving the seven campuses instead of establishing and building more campuses. The NLS should partner with the NBA-ICLE for effective continuous professional training and development of Barristers and Solicitors.

¹⁷ The Institute of Teaching and Learning is established in universities in the UK for continuous development of university teaches in all fields. E.g., in the University of Chester the Institute of Teaching and Learning is designed as 4-day program to help university teachers achieve better student outcomes by refining their teaching skills and enhancing the quality of their interactions with students (<https://www1.chester.ac.uk/departments/learning-and-teaching-institute> [Accessed on 15/07/2022]).

¹⁸ Institute of Teaching and Learning, University of Manchester, Manchester, UK. <https://www.staffnet.manchester.ac.uk/umitl/about/> (Accessed on 15/07/2022).

¹⁹ Benchmark Minimum Academic Standards for Undergraduate Programmes in Nigerian Universities Law, January 2018 p. iii; Section 10 (1) Education (National Minimum Standard and Establishment of Institutions) Act, Cap E3, Laws of the Federation of Nigeria 2004 [5].

5. Composition of the CLE

The Legal Education (Consolidation, etc.) Act (the Act) re-enacts the Legal Education Act 1962 as amended up to date and introduces new provisions relative to the composition of the Council of Legal Education amongst other provisions.²⁰ It has no provision for the National Association of Law Teachers (NALT) to nominate some of its members to serve on the CLE. It is strange and abnormal that the NALT is not included in the composition of membership of the CLE. NALT ought to have its nominated representatives on the CLE. Section 2 of the Act provides as follows:

2. (1) The Council shall consist of-
- (a) a chairman to be appointed by the National Council of Ministers on the recommendation of the Attorney-General of the Federation;
 - (b) Attorneys-General of the States or, where there are no Attorneys-General, the Solicitors-General of the States;
 - (c) a representative of the Federal Ministry of Justice to be appointed by the Attorney-General of the Federation;
 - (d) the head of the faculty of law of any recognised university in Nigeria whose course of legal studies is approved by the Council as sufficient qualification for admission to the Nigerian Law School;
 - (e) the president of the Nigerian Bar Association;
 - (f) fifteen persons entitled to practise as legal practitioners in Nigeria of not less than ten years standing and selected or elected by the Nigerian Bar Association;
 - (g) the Director-General of the Nigerian Law School, and;
 - (h) two persons who must be authors of published learned works in the field of law, to be appointed by the Attorney-General of the Federation.

Section 2 (1) (d) provides for “the head of the faculty of law of any recognised university in Nigeria whose course of legal studies is approved by the Council as sufficient qualification for admission to the Nigerian Law School” to be member of the council. The law is silent on how the head of a law faculty is to be appointed, unlike Section 2 (1) (f) that provides for “fifteen persons entitled to practice as legal practitioners in Nigeria of not less than ten years standing and selected or elected by the Nigerian Bar Association”; and Section 2 (1) (h) which specifically provides for “two persons who must be authors of published learned works in the field of law, to be appointed by the Attorney-General of the Federation.” It is clear from the wording of Section 2 (1) (d) that the silence on how the head of a law faculty is to be appointed is because the expectation is that the head of each qualified law faculty is automatically a member of the CLE without any further need to appoint him or her as a member. That has been the position before now. The sub-section provides that “The *head of the faculty of law of any recognised university* in Nigeria whose course of legal studies is approved by the Council as sufficient qualification for admission to the Nigerian Law School” (emphasis mine) will be a member of CLE. “The head the faculty of law of any recognised university” has only one

possible interpretation, which is that all the heads will be members of the CLE. They do not need any further, or another appointment by anybody or authority. The language is simple and unambiguous. In *Aderounmu v. Aderounmu*²¹ the Nigerian Court of Appeal noted that.

“...(4) *Where a document is clear, the operative words in it should be given their simple and ordinary grammatical meaning.* (5) *The general rule is that where the words of any instruments are free from ambiguity in themselves and where the circumstances of the case have not created any doubt or difficulty as to the proper application of the words to claimants under the instrument or the subject-matter to which the instrument relates, such an instrument is always to be construed, according to the strict, plain, and common meaning of the words themselves.*” (Emphasis is mine).

Is it impossible to understand the words expressed by the legislature in Section 2 (1) (d) of the Legal Education (Consolidation, etc.) Act? The answer must be in the negative. In *Savannah Bank of Nigeria Ltd & Anor v. Ajilo & Anor*²² the Supreme Court of Nigeria per Obaseki, J. S. C. stated that “The discovery of the intention of the law maker as conveyed by the words of the statute is what the search is all about when the court embarks on statutory interpretation.” In *Onyedebelu v. Nwaneri & Ors.* (2008)²³ the Court of Appeal per Abdullahi, J. C. A held that “The guiding principle in the interpretation of statutes is that the words must be given their ordinary and grammatical meaning. The primary concern of the Court is the intention of the law makers.”²⁴ However, the Attorney-General of the Federation and Minister of Justice purporting to act under Section 2 (1) (d) of the Act selected the head of one faculty of law to represent all law faculties on the Council. Section 2 (1) (d) of the Act does not give the Attorney-General the power to appoint the head of a law faculty.

Hitherto, all heads of all CLE approved law faculties were members of the CLE. The Legal Education (Consolidation, etc.) Act has maintained and retained that position. It could be argued that with over seventy approved faculties of law, and the likelihood that the number will increase, the CLE will be unwieldy with all heads of law faculties in Nigeria, especially as there are other stakeholders represented on the CLE, including thirty-six Attorneys-General of States and the President of Nigerian Bar Association with fifteen other members of the Nigerian Bar Association. That is the law until it is amended. The act of the Attorney-General of the Federation and Minister of Justice in selecting one head of a law faculty to represent seventy or more law faculties in a Council that regulates legal education and the operation of law faculties in all Nigerian universities is a violation of the law and *ultra vires* his authority. It is to say the least retrogressive.

If it becomes necessary to depart from the practice and the law of having all heads of law faculties on the CLE, it is

²⁰ E.g., the appointment of the Director-General of the Nigerian Law School.

²¹ (2003) 2 NWLR (Pt. 803) 7 at 22, Suit No: CA/I/173/2000. Court of Appeal, Ibadan.

²² (1989) LPELR-3019 (SC) (Pp. 27 paras. B).

²³ (2008) LPELR-4793 (CA) (Pp. 26 paras. B).

²⁴ See also *Ojokolo v. Alamu* (1987) 3 NWLR (61) 377 at 402 - F - H; *Ahmed v. Kassim* (1958) SCNLR 28 at 30 C.

suggested that provision be made for the President of NALT, and not less than nine other members of the NALT (preferably heads of law faculties) elected or selected by the NALT to be members of the CLE. In the suggested arrangement, the Nigerian Bar Association should have not more than ten members on the CLE and there should be not more than eighteen Attorneys-General of States to be appointed by the Attorney-General of Nigeria from among the Attorneys-General of the States in rotation.

6. Conclusion and Recommendation

Recommendations by previous conferences and summits [1-4] on quality of training for law students in the universities and barrister and solicitor training in the NLS have not been implemented over the decades because each time, the cart was paced before the horse. Recommendations have been made in the past without making provision for the establishment of an organisation that should implement them. There should be new mitigation strategies for the national legal education management system to avoid same fatal mistake this time. First things must be done first. The recommendations in that regard are set out below.

- 1) The NBA should as a matter of urgency prevail on the Attorney-General of the Federation and Minister of Justice to create and establish a proper office and secretariat for the CLE, with the Office of Executive Secretary, Directorates, and other categories of staff as are necessary for the CLE to function efficiently and effectively like any other statutory regulatory body.
- 2) The NBA should put pressure on the Attorney-General of the Federation to reflect on the need for balanced participation of critical stakeholders in legal education in the work of the CLE by ensuring that all heads of law faculties and colleges of law whose courses of legal studies are approved by the CLE as sufficient qualification for admission to the Nigerian Law School are invited to serve as members of the CLE. In the alternative, the Attorney-General should commence the process to amendment of the Legal Education (Consolidation, etc.) Acts as suggested herein to redress the wrong actions taken with regards to the composition of the present CLE.
- 3) The NBA should push to ensure that NLS is adequately funded always, and its campuses improved, expanded, and provided with appropriate facilities and staff.
- 4) NBA and other stakeholders should resist any attempt to establish new campuses of NLS.

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