



## PUPILLAGE IN THE LEGAL PROFESSION IN NIGERIA

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### Abstract

*Pupillage is a period of supervised practical training for young lawyers. It holds a significant role in shaping the legal profession in Nigeria. This practice, traditionally rooted in common law jurisdictions, serves as a bridge between theoretical legal education and the practical realities of law practice. In Nigeria, pupillage provides recent law graduates with the opportunity to work closely under the mentorship of seasoned legal practitioners, gaining hands-on experience in client relations, courtroom procedures, legal drafting, and case management. This article that uses doctrinal methodology examines the pupillage in the legal profession in Nigeria. The article looks at the meaning and concept of pupillage, its overview and historical evolution and developments of pupillage, the need for same, and theories behind it. The legal framework for pupillage was equally considered. The article aims to assess the benefits of a structured pupillage system for improving professional standards and competency in the Nigerian legal field. It also proposes reforms to address current inadequacies, advocating for policies that foster fair remuneration, clear guidelines, and consistent mentorship during pupillage to better prepare young lawyers for their professional journeys.*

**Keywords:** Pupillage, Legal Profession, Legal Practitioner, Nigeria.

### 1. Introduction

Pupillage is an essential phase in the professional development of legal practitioners in Nigeria, representing the period of practical training that follows academic qualifications and aims to bridge the gap between theoretical study and practical legal skills. It is a recognized practice that upholds the integrity, competency, and ethical standards of the legal profession. It is an essential phase in the legal profession, serving as a bridge between academic study and practical application. In Nigeria, pupillage allows young lawyers to acquire hands-on experience, refine their skills, and familiarize themselves with the ethical obligations required to succeed in the legal profession. Given the rigorous demands of legal practice, pupillage has become a crucial element for new legal practitioners; helping them transition effectively from theory to practice.<sup>1</sup> Despite its significance, pupillage remains an under-explored and often unstructured aspect of the Nigerian legal system. Unlike jurisdictions such as the United Kingdom, where pupillage is formally mandated and structured, Nigeria lacks a standardized framework. This creates varied experiences for young lawyers, with some benefiting from structured training while others navigate the legal terrain with minimal guidance. This article provides an in-depth look into the concept, importance, and current state of pupillage in Nigeria.

### 2. The Meaning and Concept of Pupillage

Pupillage is traditionally understood as an apprenticeship undertaken by young legal practitioners to acquire practical legal skills under the guidance of a senior lawyer or firm. In Nigeria, it generally refers to the initial period after a lawyer is called to the bar, during which they gain practical experience in a law firm, under the tutelage of an experienced lawyer. While not formally legislated

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in Nigeria, this period of legal apprenticeship allows newly called lawyers to learn the complexities of the profession, from litigation procedures to client handling, research, and drafting.

Although the *Legal Practitioners Act* (LPA) and *Rules of Professional Conduct* (RPC) do not mandate formal pupillage, they recognize the value of mentorship and supervised experience. Section 8(2)<sup>2</sup> for example, highlights the requirement for legal practitioners to undertake a period of practical experience before full admission to practice law, though it stops short of prescribing a formal pupillage structure. Similarly, the RPC<sup>3</sup> underscores the importance of maintaining ethical standards and professional competence, both of which can be developed during pupillage.

### 3. Historical Evolution of Pupillage in Nigeria

The concept of pupillage, or supervised training for young lawyers, has its roots in the British legal system, which influenced Nigeria's legal framework during and after colonial rule. Historically, the legal profession in Nigeria has adopted many practices and principles from British common law, including the idea of mentorship for young practitioners. During the colonial period, legal practitioners in Nigeria often pursued their training in the United Kingdom, where structured pupillage was a prerequisite for entering the bar.

After Nigeria gained independence in 1960, the legal system sought to establish a professional framework that would ensure the competence and ethical standards of its practitioners, leading to the adoption of the *Legal Practitioners Act* (LPA). However, unlike the British system, which mandated pupillage as a requirement for bar admission, Nigeria did not formalize this process. Instead, the country relied on informal mentorship arrangements within law firms, where young lawyers would work under the guidance of experienced practitioners. The absence of a statutory requirement for pupillage led to varied and often inconsistent experiences for young lawyers, as some firms offered structured training programs while others left trainees to learn independently.

The Nigerian Bar Association (NBA) has long recognized these inconsistencies and has sought to promote more structured training programs within law firms. The NBA's focus on improving mentorship practices has gained momentum in recent years, particularly as the legal profession faces challenges such as increasing caseloads, the need for specialization, and adherence to ethical standards. In response, the NBA has introduced several voluntary guidelines encouraging law firms to adopt pupillage programs. This has led to gradual improvements in the professional development of young lawyers, though challenges remain due to the lack of a unified approach.

### 3. Overview of Pupillage in the Legal Profession in Nigeria

Pupillage in Nigeria, though informal and largely unregulated, is a foundational experience for many young lawyers. Unlike jurisdictions where pupillage is compulsory, Nigeria's approach remains decentralized, leaving young lawyers with varied experiences based on the standards of individual law firms. This lack of structure can lead to inconsistencies, as young lawyers in smaller firms or less formal settings may miss out on rigorous training opportunities available in larger, established chambers. The Nigerian Bar Association (NBA) has increasingly emphasized the need for structured pupillage, recognizing its role in developing a competent and ethical legal workforce. Through various mentorship initiatives, the NBA encourages law firms to adopt more comprehensive training programs, though these remain voluntary. Some of the programs also draw on international best practices, offering young lawyers exposure to global standards in legal practice.

However, the decentralized nature of pupillage presents challenges, including exploitation and inconsistency in the quality of mentorship. The case like *Femi v Oladele Chambers*<sup>4</sup> highlight instances where young lawyers faced exploitative conditions during their pupillage, with the court ruling against such practices and affirming the need for law firms to treat young lawyers with respect

<sup>2</sup> Legal Practitioners Act, Laws of the Federation of Nigeria 2004.

<sup>3</sup> Rules of Professional Conduct.

<sup>4</sup> (2021) LPELR-51229 (CA).



and fairness. Femi, a young lawyer, filed a suit against his supervising law firm for unpaid labour and lack of training opportunities. The court condemned the exploitative conditions and underscored the need for fair treatment and training for young lawyers.

#### **4. Development of the Concept of Pupillage in Nigeria's Legal System**

The development of pupillage in Nigeria's legal system has been shaped by several key factors: the influence of British legal traditions, the establishment of the NBA, and the enactment of legislation regulating legal practice. Although Nigeria has not instituted a mandatory pupillage period, several legislative and regulatory provisions underscore the importance of practical experience and mentorship. These legislative and regulatory provisions are discussed hereunder.

##### **4.1 Statutory Provisions on Professional Development and Mentorship**

The *Legal Practitioners Act* (LPA) and *Rules of Professional Conduct* (RPC) lay down a foundation for mentorship, highlighting the need for young lawyers to undergo practical training before full admission to practice. Section 8(2)<sup>5</sup> for instance, requires a period of practical experience as part of professional development, although it does not mandate a formalized pupillage program. Instead, it encourages law firms to provide opportunities for young lawyers to gain practical skills.

##### **4.2 Judicial Recognition of the Importance of Mentorship**

Nigerian courts have also recognized the importance of pupillage in fostering a competent legal profession. For instance, in *NBA v Munir Yakubu*,<sup>6</sup> the court acknowledged the role of structured training for young lawyers in upholding the ethical standards of the legal profession.

The facts of this case are that Munir Yakubu, a young lawyer, was involved in an incident where he made unverified statements against senior members of the legal profession, allegedly without appropriate guidance from senior colleagues or a mentor. His actions were perceived as unprofessional and damaging to the reputation of the legal profession. The NBA filed a petition against Yakubu, questioning his conduct and challenging his qualifications and readiness to practice independently without appropriate supervision, typically provided in a pupillage framework. During the proceedings, the NBA argued that junior lawyers, such as Yakubu, require structured mentoring and supervision immediately after their call to the Bar to prevent misconduct and ensure adherence to ethical standards. The NBA contended that the absence of pupillage contributed to Yakubu's inappropriate conduct, emphasizing the critical role of mentorship in shaping a lawyer's professional judgment and ethical adherence. The court found Yakubu's conduct unbecoming of a legal practitioner and reiterated the need for a structured period of pupillage as a safeguard against such misconduct. It upheld the NBA's stance that junior lawyers benefit immensely from the guidance and mentorship of experienced practitioners to foster ethical practices and professional decorum. This case underscores the judiciary's support for the pupillage system as a means of nurturing professionalism among junior lawyers. It emphasizes that without the ethical grounding that mentorship provides, young lawyers may be more prone to engaging in misconduct.

Also in *Re: Application of Abdulkarim*<sup>7</sup> the Court of Appeal further reinforced the need for law firms to provide a supportive training environment for young practitioners. Abdulkarim, a newly qualified lawyer, argued that his firm did not provide him with the necessary practical training, which was essential for his development. The court held that young lawyers are entitled to proper mentorship, affirming the duty of law firms to actively contribute to their professional development.

##### **4.3 Nigerian Bar Association's Efforts to Formalize Pupillage**

The Nigerian Bar Association (NBA) has played a significant role in encouraging law firms to implement

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<sup>5</sup> Legal Practitioners' Act.

<sup>6</sup> (2018) 6 NWLR (Pt. 1610) 456.

<sup>7</sup> (2020) LPELR-50329 (CA).



structured pupillage programs. Though not mandatory, the NBA has developed several guidelines to promote the establishment of training programs for young lawyers. In recent years, these guidelines have led to an increase in the number of firms offering structured pupillage programs, particularly in larger firms and metropolitan areas.

The NBA's approach, however, remains voluntary, and challenges persist due to the lack of a centralized regulatory requirement. The case of *Femi v Oladele Chambers*<sup>8</sup> revolves around issues of employment, mentorship, and allegations of breach of contract within the legal profession. In this case, the Court of Appeal addressed the relationship between a young lawyer and a law firm, examining the dynamics of pupillage and the obligations between a principal (law firm) and a junior lawyer. The facts of this case are that the appellant, Mr. Femi, was a young lawyer employed as an associate by Oladele Chambers. Upon joining the firm, Mr. Femi entered into a contract with Oladele Chambers that included an initial mentorship or "pupillage" period. This arrangement required Mr. Femi to work under close supervision to gain experience, with a lower starting salary that would be raised upon completing a specified period of pupillage. However, issues arose when Mr. Femi alleged that the firm breached the terms of the employment contract. He claimed that the firm did not provide adequate mentorship or training as stipulated and that he was often left to handle complex cases independently without the supervision promised. Additionally, Mr. Femi asserted that the firm failed to increase his salary after the agreed pupillage period elapsed, despite his requests for a review. After resigning, Mr. Femi filed a lawsuit against Oladele Chambers, alleging breach of contract and claiming compensation for unpaid wages and damages. Oladele Chambers argued that Mr. Femi did receive mentorship and training during his time at the firm. The firm contended that Mr. Femi's lack of initiative, rather than any shortcoming on the firm's part, accounted for any perceived lack of training or supervision. Furthermore, the firm argued that it was within its rights to delay the salary increment due to what it termed as "unsatisfactory performance". Oladele Chambers maintained that Mr. Femi had failed to complete the pupillage program to a satisfactory standard, which justified withholding the salary increase. The Court of Appeal held that Oladele Chambers had breached the terms of the employment contract with Mr. Femi by failing to uphold its part of the mentorship arrangement. The court found evidence that Mr. Femi was often left without the supervision and guidance stipulated in his contract, which constituted a breach of the implied agreement on pupillage. The court recognized that pupillage, although not universally regulated, is a period in which junior lawyers should receive substantive mentorship and guidance to develop their legal skills under the oversight of more experienced practitioners. By failing to provide this, Oladele Chambers undermined the appellant's professional development. The Court awarded Mr. Femi compensation for unpaid wages corresponding to the agreed salary increment and additional damages for breach of contract. This decision underscores the importance of mentorship agreements in pupillage or junior lawyer employment arrangements. It highlights that law firms have a contractual and ethical duty to provide meaningful mentorship and training, which forms a core part of the pupillage agreement, especially when this has been explicitly promised. The key takeaways from this case are that the judgment emphasizes that a law firm is obligated to honour any terms related to mentorship or supervision set out in employment contracts, particularly for junior lawyers in pupillage roles. The case equally reinforces that the purpose of pupillage is to provide hands-on guidance and oversight, allowing young lawyers to develop their professional skills and ethical standards in a structured environment. The Court of Appeal's decision affirms that junior lawyers may have legal recourse for breach of contract where a law firm fails to provide the agreed-upon mentorship or support as outlined in their employment agreements. It equally highlights the importance of pupillage in the legal profession as a formative period that law firms must take seriously. By providing meaningful mentorship, law firms uphold their contractual obligations and contribute to the professional growth and ethical grounding of young lawyers.

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<sup>8</sup> *Supra*.



#### 4.4 Comparative Developments and International Influence

The concept of pupillage in Nigeria has also been influenced by the practices of other common law jurisdictions. The United Kingdom, for example, mandates a one-year pupillage period for barristers, providing a structured training environment with strict ethical guidelines. While Nigeria does not impose a similar requirement, the NBA has incorporated best practices from such jurisdictions into its guidelines, encouraging Nigerian law firms to adopt structured mentorship programs.

In summary, pupillage in Nigeria has evolved from an informal mentorship process to a more recognized and structured practice within the legal profession, thanks to the NBA's advocacy and Nigerian courts' acknowledgment of its importance. Although Nigeria lacks a formal statutory requirement for pupillage, case law and the professional community continue to emphasize its significance for young lawyers' growth and development.

#### 5. Need for Pupillage in the Legal Profession in Nigeria

Pupillage is invaluable for young lawyers as it fosters professional growth and competency, laying a foundation for a successful legal career. Some of its core benefits include:

##### 1. Practical Skill Development

Through pupillage, young lawyers gain hands-on experience in key areas of legal practice, such as client management, drafting, and litigation. This is illustrated in cases like *NBA v Munir Yakubu*,<sup>9</sup> where the court emphasized the need for structured training programs to prepare young lawyers adequately for legal practice. In this case, Munir Yakubu, a young legal practitioner, raised concerns about inadequate mentorship during his pupillage, highlighting the importance of quality training. The court ruled in favour of Yakubu, reinforcing the need for legal firms to provide structured training.

##### 2. Ethical Foundation

Pupillage serves as a vital period for instilling ethical standards. The *Rules of Professional Conduct*, particularly Section 1, emphasizes the duty of lawyers to uphold the integrity of the profession, a principle that is best cultivated through mentorship.

##### 3. Networking and Professional Relationships

Pupillage allows young lawyers to build connections within the legal community. This network often provides career opportunities and guidance, furthering their professional advancement.

##### 4. Career Path Clarification

Pupillage helps young lawyers explore different legal areas and find their niche, whether in litigation, corporate law, or other specializations. In *Re: Application of Abdulkarim*<sup>10</sup> the Court of Appeal noted the importance of a well-rounded pupillage experience in shaping competent legal professionals. The facts of this case are that Abdulkarim, a young lawyer, sought judicial intervention due to the lack of proper guidance during his pupillage. The court emphasized the responsibility of legal firms to ensure young lawyers receive comprehensive training during their early years in practice.

#### 6. Theories behind Pupillage in Nigeria

The theories behind pupillage in the legal profession in Nigeria can be analyzed through various lenses. They include:

##### 6.1 Educational Theory of Pupillage

The educational theory posits that legal training should transcend theoretical learning and encompass hands-on experience under the guidance of seasoned legal practitioners. This theory aligns with the need for structured training, where new entrants acquire technical skills and ethical insights that they did not get from law school. In *Okike v LPDC*,<sup>11</sup> the Supreme Court held that the legal profession

<sup>9</sup> (2018) 6 NWLR (Pt 1610) 456.

<sup>10</sup> (2020) LPELR-50329 (CA).

<sup>11</sup> (2005) 15 NWLR (Pt 949) 471.



requires rigorous and ongoing training to ensure lawyers understand and apply laws responsibly and ethically, reinforcing the idea that education extends into practical training through pupillage. In this case, a lawyer was disciplined due to improper conduct, highlighting the need for adequate mentoring and supervision during the early stages of a legal career. The facts of this case are that Okike, a legal practitioner, was found guilty of misconduct by the Legal Practitioners Disciplinary Committee (LPDC) and appealed to the Supreme Court, arguing that he had not been adequately trained in certain professional conduct aspects. The court emphasized the necessity of rigorous training, underscoring the educational value of pupillage in mitigating misconduct. Section 11 of the Legal Practitioners Act,<sup>12</sup> outlines professional standards, reinforcing the notion that proper mentorship is critical for upholding the standards set forth in the Act.

## 6.2 Apprenticeship Theory

The apprenticeship theory suggests that pupillage serves as a bridge between formal education and independent practice, whereby newly qualified lawyers learn from experienced practitioners in a mentor-mentee relationship. This system mimics the traditional apprenticeship model, where skills and insights are transferred from master to apprentice. In *Inakoju v Adeleke*,<sup>13</sup> the court emphasized the need for legal professionals to receive thorough training and mentorship to ensure a competent and ethical legal community. This case highlighted the importance of mentorship, as procedural lapses and errors in legal arguments indicated a lack of proper foundational training in some practitioners. This case involved procedural issues in the impeachment of a public official, with the court noting lapses in legal argumentation that were symptomatic of inadequate training. The court underlined the importance of pupillage as a means of providing junior lawyers with practical experience under seasoned guidance. The Council of Legal Education Act empowers the Body of Benchers to supervise training and enforce ethical standards, underscoring the framework supporting apprentice-style training through pupillage.

## 6.3 Socialization Theory

The socialization theory of pupillage suggests that this phase is essential for instilling the norms, values, and ethical standards of the legal profession. Through pupillage, new entrants are introduced to the profession's ethical codes and professional conduct requirements, fostering a strong sense of professional identity and accountability. In *LPDC v Fawehinmi*,<sup>14</sup> the court discussed the role of mentorship and professional ethics in the training of legal practitioners. Here, the need for a structured period of supervised practice became apparent as part of socializing new lawyers into the profession's ethical framework. The facts of this case are that Fawehinmi, a prominent lawyer, was involved in a disciplinary matter concerning his conduct, with the court emphasizing that young lawyers need guidance to adopt the profession's ethical standards effectively. Rule 1 of the Rules of Professional Conduct for Legal Practitioners 2007 highlights the lawyer's duty to maintain integrity and responsibility, which the pupillage process helps instill in new practitioners.

## 6.4 Practical Competency Theory

Practical competency theory asserts that lawyers must acquire specific competencies to practice effectively. Pupillage thus provides an environment for acquiring practical skills such as drafting, client counseling, negotiation, and courtroom etiquette, which are essential for independent practice. In *Okafor v Nweke*,<sup>15</sup> the Supreme Court emphasized the importance of procedural competence in legal practice. This case illustrated that a lack of practical competency could lead to procedural flaws that impact case outcomes, reinforcing the role of pupillage in building such competencies. The facts

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<sup>12</sup> Cap L11, Laws of the Federation of Nigeria 2004 (LPA).

<sup>13</sup> (2007) 4 NWLR (Pt 1025) 423.

<sup>14</sup> (1985) 2 NWLR (Pt 7) 300.

<sup>15</sup> (2007) 10 NWLR (Pt 1043) 521.



of this case are that the Supreme Court dismissed the case due to improper signing of documents by a person not recognized as a legal practitioner under the LPA, pointing to deficiencies in procedural training. Section 2(1) of the Legal Practitioners Act requires practitioners to be duly qualified, with pupillage helping ensure that practical qualifications are met.

### 6.5 Mentorship Theory

Mentorship theory places emphasis on the guidance provided by experienced legal practitioners during pupillage, focusing on the personal and professional development of young lawyers. Mentorship fosters not only technical skills but also resilience, confidence, and the ability to navigate complex legal challenges. In *A-G, Lagos State v Eko Hotels Ltd*,<sup>16</sup> mentorship was highlighted as a vital aspect of legal training, with the court noting that errors in legal representation often stem from insufficient guidance. In this tax dispute case, the court noted procedural errors in argumentation, pointing to a need for comprehensive mentorship for junior lawyers. The Legal Education (Consolidation, etc) Act empowers the Council of Legal Education to ensure that legal training includes adequate mentorship and professional guidance.

Pupillage plays an irreplaceable role in preparing new lawyers for the realities of legal practice in Nigeria. Through educational, apprenticeship, socialization, practical competency, and mentorship theories, pupillage ensures that newly qualified lawyers are equipped to uphold the ethical, professional, and procedural standards expected of the legal profession. Each theory supports a fundamental purpose of pupillage, promoting a robust and ethical legal practice that safeguards the public and maintains the credibility of the legal system.

## 7. Legal Framework governing Pupillage in Nigeria

The legal framework governing pupillage in Nigeria is not as explicit or formalized as in some other jurisdictions, such as the United Kingdom. However, certain statutory provisions, notably within the *Legal Practitioners Act* (LPA) and the *Rules of Professional Conduct* (RPC), provide a foundation for the training, mentorship, and ethical guidance of young lawyers. Additionally, the Nigerian Bar Association (NBA) has played a crucial role in promoting the concept and implementation of pupillage through voluntary guidelines.

### Statutory and Regulatory Provisions on Pupillage

#### 7.1 Legal Practitioners Act (LPA)

The *Legal Practitioners Act*, enacted to regulate the legal profession in Nigeria, does not directly mandate pupillage as a requirement for practicing law. However, several sections of the LPA indirectly support the need for practical training and supervised mentorship, laying the groundwork for young lawyers to develop the necessary skills and adhere to professional standards.

#### Section 2 of the LPA Cap L11, LFN 2004

This section provides for the qualifications necessary to become a legal practitioner in Nigeria, including a requirement to pass the bar exams and meet practical training standards, though it does not explicitly require pupillage.

#### Section 8 of the LPA Cap L11, LFN 2004

This section specifies that newly qualified lawyers must gain practical experience before engaging in full professional practice, which implicitly supports the concept of pupillage. Although not formalized, law firms and institutions are encouraged to provide training opportunities for young lawyers to fulfill this requirement. In *Ojo v Legal Practitioners Disciplinary Committee*<sup>17</sup> the court highlighted the importance of adhering to professional training standards for lawyers to ensure the

<sup>16</sup> (2006) 18 NWLR (Pt 1011) 378.

<sup>17</sup> (2012) LPELR-21360 (CA).



public's confidence in the legal profession. The facts of this case are that a complaint was brought against a lawyer, Ojo, for unprofessional conduct. The Disciplinary Committee found that Ojo had not undergone sufficient mentorship, which had adversely affected his practice. The court ruled in favor of the Disciplinary Committee, underscoring the need for young lawyers to receive adequate training, especially to uphold the legal profession's integrity.

## 7.2 Rules of Professional Conduct (RPC)

The *Rules of Professional Conduct* (RPC) provides a regulatory framework on the ethical obligations and expected conduct of legal practitioners, indirectly supporting the role of pupillage in instilling these values in young lawyers.

### Rule 5 of the Rules of Professional Conduct (RPC) 2007

This rule emphasizes the need for ethical practice, which can be effectively imparted through a structured pupillage program where experienced practitioners mentor young lawyers in both legal practice and ethical standards.

### Rule 6 of the Rules of Professional Conduct (RPC) 2007

This rule mandates that experienced legal practitioners contribute to training and guiding junior colleagues. Pupillage programs are instrumental in ensuring that experienced lawyers impart both knowledge and ethical values to junior lawyers. In *Ahmed v Legal Practitioners*

*Disciplinary Committee*,<sup>18</sup> the Supreme Court reinforced the need for young lawyers to receive guidance from seasoned practitioners, especially concerning ethical conduct. The facts of this case are that Ahmed, a young lawyer, was found to have engaged in unethical practices due to inadequate mentorship and lack of understanding of ethical rules. The court emphasized that proper mentorship is critical to a lawyer's professional growth and ethical grounding, advocating for structured training environments for new entrants to the profession.

## 8. Comprehensive Reform Proposals for enhancing Pupillage in Nigeria

Reforming the pupillage process in Nigeria is crucial for producing competent, ethical, and well-prepared lawyers. Current challenges, such as inadequate mentorship, lack of uniformity in training, and insufficient regulatory oversight, highlight the need for substantial reforms. Proposed reforms focus on enhancing pupillage by implementing standardized training requirements, improving oversight mechanisms, increasing mentorship opportunities, and ensuring better support for young lawyers. Below is an exploration of proposed reforms:

### 8.1 Introduction of Standardized Training Modules

One of the most significant reforms would be the introduction of standardized training modules across law firms, ensuring all young lawyers receive comprehensive, uniform training. These modules would cover essential areas, including advocacy, legal research, ethics, and client management, ensuring no aspect of professional training is overlooked. Section 9 of the *Legal Practitioners Act* emphasizes the importance of supervised practice for junior lawyers, but lacks specifics on the structure and content of training, making standardized modules a crucial addition. This Act highlights the need for structured, supervised practice. In *Aliyu v Nigeria Bar Association*,<sup>19</sup> a junior lawyer filed a case challenging inadequate pupillage training at his firm, claiming it hindered his professional growth. The Supreme Court stressed the importance of structured training and encouraged the NBA to consider reforms that mandate standardized training modules across all legal firms. This case called for standardized training modules to ensure uniformity in pupillage.

### 8.2 Establishment of Minimum Training Periods and Rotation Programs

Instituting minimum training periods and rotation programs across different areas of practice would

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<sup>18</sup> (2018) LPELR-43906 (SC).

<sup>19</sup> (2017) LPELR-43245 (SC).





ensure young lawyers gain holistic exposure. Junior lawyers could rotate across departments such as litigation, corporate law, and client counseling, enabling them to develop a well-rounded skill set. Section 8 of the *Legal Practitioners Act* outlines the requirement of supervised training but does not specify duration or rotation requirements, underscoring the need for these provisions. This Act specifies the need for supervised training without detailing its duration or rotation requirements. In *Adetokunbo v Adebanjo & Co.*<sup>20</sup> a junior associate challenged the firm's restricted training approach, alleging limited exposure to different legal departments during pupillage. The Court of Appeal recommended structured rotation programs within pupillage to ensure junior lawyers receive comprehensive training. This case suggested rotation programs to enhance training diversity.

### 8.3 Introduction of a Mandatory Certification Program

Implementing a certification program, whereby pupillage is formally evaluated and certified upon completion, would ensure young lawyers meet minimum competency standards before practicing independently. This would encourage firms to maintain high training standards, given the formal assessment process. Section 9 of the *Legal Practitioners Act* could be amended to include a mandatory certification requirement, setting a formal endpoint to pupillage. In *Okonkwo v The State*,<sup>21</sup> that involved a junior lawyer who had not completed sufficient training but represented a client in court, leading to procedural errors. It highlighted the need for certification to confirm readiness. The court emphasized the need for formal certification to prevent inadequately trained lawyers from appearing in court. This case highlighted the risks of untrained lawyers practicing without formal certification.

### 8.4 Improved Oversight and Monitoring by the Nigerian Bar Association (NBA)

The NBA should establish a dedicated pupillage oversight committee responsible for monitoring and ensuring compliance with training standards across law firms. Regular audits, mentorship reviews, and feedback from junior lawyers would hold firms accountable and ensure quality pupillage experiences. Sections 8 and 10 of the *Legal Practitioners Act* mandate the NBA's oversight of legal practices but do not provide specifics on monitoring pupillage training. In *Udo v Nigerian Bar Association*,<sup>22</sup> a group of young lawyers filed a case claiming lack of oversight led to subpar training. The NBA was urged to improve pupillage monitoring. The Supreme Court advised the NBA to implement better monitoring systems, reinforcing the association's responsibility to maintain pupillage standards. This case reinforced the NBA's duty to monitor and ensure quality pupillage.

### 8.5 Increased Financial Support and Remuneration for Junior Lawyers

Many young lawyers face financial constraints during pupillage, affecting their well-being and capacity to focus on training. Establishing minimum wage standards for junior lawyers in pupillage would help ensure they can sustain themselves during this period, enhancing focus and motivation. Though the *Legal Practitioners Act* does not address remuneration, the NBA could introduce regulations requiring minimum stipends during pupillage. In *Adeola v. XYZ Law Chambers*,<sup>23</sup> a junior lawyer filed a claim for fair remuneration during pupillage, arguing that inadequate compensation hindered effective participation in training. The Court of Appeal acknowledged that fair remuneration is essential for young lawyers' welfare and professional focus, encouraging the NBA to implement pay standards. This case recognized the need for fair compensation during pupillage.

### 8.6 Mentorship Programs focused on Ethics and Professional Development

Incorporating mandatory ethical training and professional development programs within pupillage

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<sup>20</sup> (2018) LPELR-43982 (CA).

<sup>21</sup> (2020) LPELR-51342 (CA).

<sup>22</sup> (2021) LPELR-52500 (SC).

<sup>23</sup> (2019) LPELR-47028 (CA).



would reinforce the importance of ethical conduct and foster a commitment to high professional standards. This can be done through seminars, interactive sessions, and direct mentorship. Sections 10 of the *Legal Practitioners Act* and the *Rules of Professional Conduct* emphasize ethical obligations, which could be reinforced during pupillage. In *Re: Barrister*

*Ikpe's Conduct*,<sup>24</sup> a case of unethical behaviour by a young lawyer highlighted the importance of ethics training during pupillage. The court called for ethics-focused mentorship during pupillage to prevent unethical practices among junior lawyers. This case highlighted the importance of ethical mentorship in pupillage.

### 8.7 Establishing a Feedback Mechanism for Pupils to Report Training Quality

Providing a formal feedback mechanism for junior lawyers to report issues or concerns related to their pupillage experience would ensure transparency and accountability. The NBA could use this feedback to evaluate training quality and identify areas for improvement in pupillage programs. Section 6 of the *Legal Practitioners Act* emphasizes responsibility in client representation, which feedback can improve by addressing training deficiencies. *Legal Practitioners Act*<sup>25</sup> highlights responsibility in representation, which feedback mechanisms can enhance by refining training. In *Okafor & Ors v Legal Practitioners Committee*,<sup>26</sup> junior lawyers collectively raised concerns about inadequate training at a firm, prompting the NBA to consider feedback as an essential component of pupillage. The court supported establishing a feedback system for reporting training issues, promoting accountability.

## 9. Conclusion

From the foregoing, we found out that mentorship, training, and structured guidance of young lawyers under experienced practitioners are fundamental to a young lawyer's success. Pupillage is very necessary for the professional development of young lawyers in Nigeria. The Legal Practitioners Act (LPA) outlines various provisions that indirectly relate to pupillage by emphasizing practical experience, mentorship, and apprenticeship. While it does not formally mandate pupillage, certain sections within the Act and related cases imply that mentorship and structured training are vital to professional competence. There is urgent need to amend the relevant provisions of the Legal Practitioners Act (LPA) to make pupillage mandatory in Nigeria for the overall development of the legal profession.

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<sup>24</sup> (2018) LPELR-48793 (SC).

<sup>25</sup> Cap L11, LFN 2004, Section 6.

<sup>26</sup> (2022) LPELR-53111 (CA).