

RULES OF PROFESSIONAL CONDUCT (RPC) 2023 AND SHARIAH IN NIGERIA: NAVIGATING THROUGH LEGAL, ETHICAL AND OPERATIONAL CHALLENGES

By

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Abstract

The central thrust of this paper is to make an appraisal of the Rules of Professional Conduct (RPC) 2023 and Shariah in Nigeria by navigating through legal, ethical and operational challenges. The role of the lawyer is to uphold the rule of law, to protect the rights of the individual, and to ensure that justice is done. The emergence of a digital age, the phenomenon of social media, the broad expansion of professional development for lawyers; all raise ethical issues especially in a pluralistic society. Using the doctrinal research methodology, the paper discussed amongst others; Ethical Conducts in Nigeria, Regulation of Practice by the Nigerian Bar Association (NBA) through the Mandatory Continuing Professional Development (MCPD) Rules, 2025, the MCPD Rules, Ethics under Shariah, Basis of Ethics in Shariah, Ethical Principles under Shariah, Areas of Convergence and Divergence between the RPC 2023 and Shariah Etiquettes, Navigating Through Legal, Ethical, and Operational Challenges, Obstacles to Legal Practice in Nigeria, Legislative and Policy Considerations Guide. The paper observed that professional conduct amongst legal practitioners in Nigeria is dwindling and concluded amongst others that it is crucial that ethical issues be made part of everyday life discussion among lawyers in Nigeria. The paper recommended amongst others that recognizing the dynamic nature of legal practice, continuous legal education and training in legal ethics must continually be enhanced, that the RPC Rules and Shariah etiquettes should be a walking companion for all lawyers while breaches should be reported to the appropriate disciplinary body and appropriately dealt with.

Keywords: Rules, Shariah, Etiquettes, Legal & Professional

1.1 Introduction

The role of the lawyer is to uphold the rule of law, to protect the rights of the individual, and to ensure that justice is done. This is a vital role in any society, particularly in a democracy. The rule of law is the foundation of democracy, and the judiciary is its guardian. Similarly, the digital age, the phenomenon of social media, the broad expansion of professional development for lawyers; all raise ethical issues that were non-existent or that were not fully considered a decade ago.

This ethical role is often played out in complex and or pluralistic settings like Nigeria where duties and obligations must be balanced against diverse systems like the Common Law, Islamic Law and Customary Law respectively. The legal profession is not only a conservative profession

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but the practice of law is a worthy calling. This was beautifully captured in the American Bar Journal of 1955 in an article titled "The Law as a Dynamic Profession" where it was posited thus;

We belong to an ancient, to a great, to an honored profession. The practice of Law is a worthy calling. It has rewarded us with financial success and with prestige and leadership in our communities. It has given us much happiness and the good life. From it we have received the gratitude and respect of our friends and neighbours whom we have served. Our word affords intellectual pleasure with dignity and independence, in competition with our fellow Lawyers with whom we have cemented warm friendships and enjoyed happy companionships. For these blessings, we cannot but have a sense of gratitude and of obligation. The most productive, unselfish and wholly satisfying repayment of the obligation is constructive work to increase the effectiveness of our judicial system and the welfare of the profession.

The legal profession is very significant in any society. In elaborating the significance of the legal profession, the Court in the case of *N.B.A v Okponipere*² posited as follows;

The legal profession is a profession for gentlemen; that is why the lawyer is addressed as 'esquire', whether male or female. The legal profession is not meant for rabble rousers, neither is it meant to provide license for extortionists to engage in free for all looting spree. That is why only those considered to be fit and proper persons are admitted to the Bar. Where however, an unfit and improper person slips through the mesh of the screening sieve, then he should either turn a new leave or wait the long hands of the rules of professional conduct.

In recent times, despite the Rules of Professional Conduct and exhortations by the Courts, there is regrettably a clear wane and drop in the public perception of lawyers. Dr. Tahir Mamman³ posited thus:

... These days, lawyers have the negative image of being seen as cheats, liars (some use lawyers as liars interchangeably), manipulators (turning black to white or white to black etc); excessive legal jargon and give high priority to fiscal reward. This is further complicated at the University level by unwholesome practices by academics perceived lack of commitment to teaching and assessment and compromising relationships with students...

From the above, it becomes crystal clear that the traditional conceptions of ethics have failed to deliver a satisfactory result or outcome to the individual practitioner, the profession and the

² (2013) 15 NWLR (PT. 1378) 584.

³ Ibid, p. 22.

general public at large in terms of adherence to the noble provisions of the codes. Little wonder that the Legal Practitioners Act is currently undergoing some amendments and we now have the Legal Practitioners (Amendment) Bill 2025 before the National Assembly. The new Bill provides a comprehensive overhaul for ethical principles to disciplinary enforcement.⁴ It can indeed be regarded as a blueprint for accountability in an era where legal services must match with global standards.

For legal practitioners who treat ethics with kid gloves, navigating through these systems might be herculean in terms of adherence to rules of professional conduct. It is in this respect that this paper seeks to appraisal of the Rules of Professional Conduct (RPC) 2023 and Shariah in Nigeria by navigating through legal, ethical and operational challenges with the aim of proffering recommendations.

2.1 Historical Antecedents of Conventional Ethics

In every society, people resort to various kinds of rules to guide their lives. This may be moral or ethical rules. Moral rules and ethics reminds us that it is immoral or wrong to covet, tell lies or engage in any activity which we have pledged not to engage in. Society may well disapprove the transgression of these ethical precepts.

Ethics can be linked to commencing with creation in relation to what transpired in the theological Garden of Eden between Adam, Eve and Satan, the forbidden apple Tree and God's commandment and the eventual consequences that followed suit. Ethics in the theological garden took the form of common sense morality which demanded that Adam and Eve should keep their side of the bargain. They did not and that was unethical. Man failed and that was the first known breach of ethics and man was ejected from the cherished Garden to his chagrin.

Fast forward, in ancient Rome, the Romans Hundreds of years ago talked about *exadiligentia* (i.e. diligence) especially when it involves the business of others. Ethics however demands *exata – diligentia* in regards to everything. It could not be less for it to be ethical. In ancient Rome, it was permissible for Julius Caesar to wear his crown everywhere in the provinces except Italy. There was therefore no breach of ethics in him wearing the crown in every provinces but he was prevented by agreement and in reciprocity for the honour due to him by having the crown in every province, save from wearing it in Italy which at the time was conterminous with Rome. It

⁴ For instance, Sections 30 - 31 of the new Bill sets out rules for admission of foreign lawyers to practice in Nigeria and imposes strict penalties for unlicensed practice. Sections 37 – 38 introduces strict rules for client accounts, including protection for funds held I trust, Section 21(1) now provides for an Ethics Adherence and Enforcement Committee to provide for oversight along with negligent liability mechanisms for client redress. Under Sections 3 – 9 of the Bill, the Body of Benchers have now become a corporate entity but must be given pre – action notice before it can be sued, section 25(1) (a) of the Bill now provides that a person called to the Nigerian Bar must undergo a mandatory two years pupillage except in circumstances which may be permitted by the Body of Benchers in consultation with the Nigerian Bar Association (NBA) and under Section 25(1) (b) of the Bill, a person who has not undergone the mandatory pupillage shall not practice as a sole practitioner or set up a law firm either alone or in partnership or other arrangement with other legal practitioners. Under Section 31(1) (f) of the Bill, where a person engages in unauthorized practice or attempts to do so or prepare document to that effect, commits an offence and is liable upon conviction to imprisonment for a term not less than 3 years or a fine of N5, 000,000:00 (Five Million Naira) only.

was therefore unethical for him to wear it in Rome.⁵ Ethics to them means the performance of excellence, doing the right thing at the right time be it in business, profession or even in ordinary life. They see ethics as demanding a round peg in a round hole and not a square peg in a round hole. It involves the good, the bad and the ugly.

As a matter of fact, ethics to Romans has no class boundaries as it affects prices and slaves alike and there are no scape goats. With ethics, there is no partiality, no scapegoats and no scared cow. When the Romans made these pronouncements on ethics century ago, they probably did not realize the tremendous effect these positions will have on the legal profession of contemporary times. The argument therefore is that ethics is not therefore a recent invention, not born in literal yesterday, nor is it a born again phenomenon, for it has been uninterruptedly continuous. It has existed from time and propelled through time

3.1 Meaning of Ethics in a Conventional Sense

The legal profession because it is a vocation, thrives on adherence to ethics for rendering services.⁶ At this threshold, defining ethics will not be superfluous. It is a concept that may mean different things to different people. For this discourse, and in our conventional legal system, the word ethics is derived from the Greek word *ethos*, which means character. Oxford Dictionary defines the word *ethos* as ‘the characteristic spirit of attitudes of a community, people or system or of a literary work’. In addition, Webster Dictionary describes it as ‘the character, sentiment, or disposition of a community or people, considered as a natural endowment; the spirit which actuates manners and customs; also, the characteristic tone or genius of an institution or social organization’. Ethics therefore represents a wide meaning of character, behaviour or code of conducts.

On the other hand, legal ethics specifically refers to principles of conduct governing an individual or a profession is defined as: “a system of moral tenet or principles; the collective doctrines relating to the ideals of human conduct and character.”⁷ In other words, ethics refer to standards or principles intended to generate trust, fairness, and kindness from the public. Meanwhile, conduct encompasses any behaviour, whether good or bad, and can include both actions and omissions. Ethics by this definition generally craves for honesty, decorum, reliability, trust and reliance to deserve the appellation – ethics. That is why ethic is seen as dealing with ideal human conduct. These definitions signify that the term legal ethics is related with the code of conduct, behaviour and character of members of the legal profession.

To the legal profession, ethics in the legal profession refers to the professional ethics and moral principles that govern a legal professional's behaviour, including integrity, honesty, fairness, confidentiality, and diligence, as set out in codes of conduct and rules of professional conduct that guide the behaviour and conduct of lawyers.⁸ Without ethics, the practice of law loses its

⁵ This restriction was due to the Romans' deep-seated fear of kingship after overthrowing the monarchy, and it was a significant point of tension leading up to his assassination.

⁶ H.W Jessup, ‘The Ethics of the Legal Profession’, (1922) 101 The Annals of American Academy of Political Science, pp16-29, <https://www.jstor.org/stable/1014582> Accessed: 20 March 2024.

⁷ Black Law Dictionary 10th Edition at p. 670.

⁸ See the Rules of Professional Conduct for Legal Practitioners, 2023.

moral compass and credibility. Dr. Sulaiman Usman,⁹ while advocating for good ethical conduct posited thus;

...Ethical conduct is not just a moral imperative but also a professional obligation for lawyers. Upholding ethical standards is essential for maintaining the integrity of the legal profession, ensuring fair and just outcomes in legal proceedings, and upholding the rights and interests of clients. Ethical lapses can lead to legal malpractice, damage to client trust, conflicts of interest, and erosion of public confidence in the legal system. Such conduct undermines the lawyer's ability to serve clients' interests and uphold the rule of law...

Ethical considerations are therefore fundamental to the practice of law, serving as guiding principles that shape the conduct of legal professionals and maintain the integrity of the legal profession.¹⁰

Ethics and professional responsibility are being conceived in Nigeria's academia and taught in terms of duties to the Court, clients and the legal profession as they exist in regulatory codes, statutes and case law. The legal education in Nigeria therefore needs to re – shift focus from teaching of external codes only to that which focuses on 'internal education of lawyers professional conduct'.¹¹ There is a strong trend towards strengthening the role of ethics in modern law curriculum so as to promote 'good lawyering'. This desire to promote ethics in legal education should be in tandem with government's concern for good image for the country captured in the slogan in Nigeria: '*good people, great nation*'. Part of the suggestion given to enhance this drive is on the roles of law clinics, literature and storytelling in sensitizing lawyers of their responsibilities which are far beyond the prescriptions in the professional Code of Conduct.¹²

Clinging to the past does not make sense. The teaching of legal ethics must be given more attention in law schools. It's not just a few lectures at the conclusion of a law course that teaches you about professional statutes, etiquette, bookkeeping, and trust account regulations. When it comes to teaching the law, it's important to think about ethical dilemmas that may arise in the course of a legal career. Ethical dilemmas and professional responsibilities confronting students when they enter the legal profession should be addressed in this manner by the Universities as they cannot avoid teaching Legal Ethics.

⁹ Dr. Sulaiman Usman, 'Ethics, Etiquette, and Navigating Ethical Precepts in Legal Practice in Nigeria' being the text of a paper presented at one day seminar of the Litigation Committee of the Nigerian Bar Association section on Legal Practice on the Theme 'Legal Practice in Nigeria – Reinforcing Ethical Behaviour', held on Friday 22nd March, 2024 at Lagos Court of Arbitration, Lekki, Lagos State.

¹⁰ Ibid.

¹¹ N. Preston, *Understanding Ethics*, (Federation Press, 1st Edition, 1996) 198 – 199.

¹² Dr. Tahir Mamman, 'The Globalization of Legal Practice: The Challenges for Legal Education in Nigeria' A paper presented at the 2nd Annual Business Luncheon of S. P. A. Ajibade & Co – Legal Practitioners on Thursday 19th November, 2009, p. 23.

Through the use of instances and hypotheticals, students learn about legal concepts. To paraphrase Professor Ross Cranston, it is the obligation of all law professors to educate the ethical foundations of legal practice, not only the technical regulations. Ethical concerns that practitioners encounter must be resolved and students exposed to larger issues.

4.1 Ethical Conducts in Nigeria

In Nigeria, the RPC, 2023 is the most recent iteration of the codified rules of ethics that members of the legal profession in Nigeria are required to comply with. The importance of these rules can be seen from the stand point that it forms the bulk of the course, "Professional Ethics" studied at the Nigerian Law School.

The General Council of the Bar in exercise of the powers conferred on it by Section 12(4) of the Legal Practitioners Act (LPA)¹³ and all other powers enabling it in that regard made the New Rules on the 6th of June, 2023. The General Council of the Bar introduced the New Rules for the purpose of maintaining a high standard of conduct, etiquette, and discipline amongst legal practitioners in Nigeria. The RPC, 2023 which was made under the powers of the Bar Council under Section 12(4) of the LPA is binding on all legal practitioners.

Rule 1 of the RPC, 2023 encapsulates the cardinal principle of legal ethics in legal practice in Nigeria. It provides; **‘A Lawyer shall uphold and observe the rule of law, promote and foster the cause of justice, maintain a high standard of professional conduct, and shall not engage in any conduct which is unbecoming of a legal practitioner’.**

The above rule of professional conduct encapsulates the core ethical obligations and responsibilities that lawyers are expected to uphold in their practice.¹⁴ Other ethical conducts expected at the domestic level in Nigeria can be summarised as follows;

- a. **Uphold and Observe the Rule of Law;**
- b. **Promote and Foster the Cause of Justice;**
- c. **Maintain a High Standard of Professional Conduct; and**
- d. **Not to Engage in any Conduct that is unbecoming of a Legal Practitioner**

These provisions bring to mind the saying of Calpurnia Caesar’s wife that *"Caesar's wife must be above suspicion"*. This phrase has been extended to include lawyers and other public officials which underscores the importance of maintaining the highest standards of integrity and avoiding even the appearance of impropriety. Lawyers have a professional duty to act in accordance with the RPC, 2023.

The Legal Practitioners (Remuneration for Business, Legal Services and Representation) Order 2023 (Remuneration Order, 2023) was made by the Legal Practitioners Remuneration Committee and signed into law¹⁵ in exercise of the powers conferred by Section 15(3) of the LPA Act and all other powers enabling it in that regard.¹⁶ It is therefore a subsidiary legislation deriving its force from the principal law which is the LPA. Interestingly, the provision of Rule

¹³ Cap. L11 Laws of the Federation of Nigeria 2004 as amended.

¹⁴ Dr. Sulaiman Usman (n 9).

¹⁵ It was signed into law on the 16th of May 2023.

¹⁶ It revoked the Legal Practitioner (Remuneration for Legal Documentation and other Land Matter) Order, 1991.

48(2) of the RPC, 2023 provides that any fee for service rendered by a legal practitioner shall not be in violation of the Remuneration Order, 2023. This is a departure from the Old Rules which merely state that a lawyer shall not enter into an agreement for, charge, or collect an illegal or clearly excessive fee. The Remuneration Order, 2023 provides detailed guidelines for the remuneration of legal practitioners in Nigeria.

It has now made it a professional misconduct to charge less than the fees prescribed in the Order without justification. The RPC, 2023¹⁷ stipulates that a lawyer shall not enter into agreement for, charge or collect any fees in violation of the Remuneration Order, 2023. It equally imputes a duty on every lawyer who knows that any lawyer has breached any of the Rules of Professional Conduct to report such lawyer to the appropriate authority for disciplinary action.¹⁸

A new chapter on the Guidelines and Rules on Anti-Money Laundering and Combating the Financing of Terrorism for Legal Practitioners is now decoded in the RPC, 2023. These guidelines are for internal self - regulation of members of the legal profession and therefore seek to promote adherence to the rule of law, promote the duty of confidentiality towards clients and encourage the adoption of the risk-based approach for legal practitioners to be able to identify money laundering, terrorism financing, and proliferation financing situations before they occur.¹⁹

5.1 Regulation of Practice by the Nigerian Bar Association (NBA) through the Mandatory Continuing Professional Development (MCPD) Rules, 2025 for all lawyers in Nigeria

Traditionally, the legal profession was largely focused on litigation and courtroom work, but the increasing complexity of global markets and the rise of new technologies have broadened the scope of the legal profession. The profession has now undergone significant changes, influenced by a range of factors that include advances in technology and changing client needs. Today, law firms, corporations, and government agencies are looking for professionals with diverse skill sets, enabling lawyers to engage in a wider range of activities that extend beyond traditional legal practice.

The Nigerian legal market is evolving, therefore continuous skill development and lifelong learning are essential for all lawyers who aspire to stay relevant, competitive, and successful in their careers. The legal profession demands a constant sharpening of both technical and soft skills as the legal landscape continually adapts to new laws, technologies, and global trends. By investing in personal and professional growth, young lawyers can differentiate themselves, seize new opportunities, and remain at the forefront of their chosen practice areas.

In every serious legal jurisdiction, whether it is the Law Society of Ontario, the Solicitors Regulation Authority in England, or state Bar associations in the United States, lawyers must: Participate in mandatory CPD, maintain good standing through compliance with ethical and educational obligations as well as possess proof of compliance in the form of annual certification. It is therefore a professional conduct to be competent.

¹⁷ Rules of Professional Conduct for Legal Practitioners 2023, Rule 48(2).

¹⁸ Ibid, Rule 74(3).

¹⁹ Ibid, Rule 55.

The LPA is a foundational statute for legal practice in Nigeria. It outlines the essential statutory requirements for an individual to be entitled to practice law in Nigeria.²⁰ However, it does not fully regulate the standards of legal practice. It explicitly designates the Nigerian Bar Association (NBA), as the *de facto* regulator of the legal profession in Nigeria (acting through the Bar Council and its internal structures), has an implied mandate to ensure its members are fit for purpose in an ever-evolving legal landscape and adapt to global best practices in legal education and professional development.

The NBA is dedicated to fostering a legal profession that is dynamic, knowledgeable, and consistently upholds the highest standards of excellence.²¹ Post qualification continuing professional development is critical to providing and enhancing the standards of legal practice in Nigeria.²² To achieve this, the NBA, through its Institute of Continuing Legal Education (NBA-ICLE), has introduced and now enforces the Mandatory Continuing Professional Development (MCPD) Rules, 2025. These Rules play a vital role in helping legal professionals in Nigeria stay up- to-date with the latest legal knowledge, skills, and ethical practices. Since the legal landscape is always changing, NBA felt the need for continuous learning so that members can better serve our clients and uphold the public's trust in the justice system.²³

5.1.1 Purposes of the MCPD Rules

The MCPD Rules are designed to:

- i. Enhance Professional Competence: Equip lawyers with updated legal knowledge and skills to navigate complex legal issues.
- ii. Improve Service Delivery: Ensure the quality of legal services rendered to the public meets international best practices.
- iii. Uphold Professional Standards: Maintain the dignity, integrity, and reputation of the legal profession in Nigeria.
- iv. Foster Continuous Learning: Cultivate a culture of lifelong learning within the Bar, essential for adapting to new legal developments and societal needs.

All legal practitioners can now fulfil the 5 CPD minimum requirements through any of the following activities:

- i. Attending the NBA Annual General Conference
- ii. Participating in approved and accredited NBA Branch CPD Programmes
- iii. Attending NBA-ICLE training organized by Approved Service Providers
- iv. Attending CPD Programmes where approved training is delivered
- v. Joining accredited training sessions organized by NBA Sections and For a
- vi. Participating in NBA-ICLE online training sessions

²⁰ Legal Practitioners Act (LPA), Cap L11 LFN 2004, s. 2(1).

²¹ Section 12(4) of the LPA authorizes the Bar Council (comprised of the Attorney-General of the Federation and State Attorneys-General) to make Rules of Professional Conduct (RPC) for lawyers. The RPC 2023, made pursuant to this power, forms the operational framework for legal practice in Nigeria today.

²² Dr Tahir Mamman (n 9) p.25. Similarly, the Council of Legal Education has a mandate under the Council of Legal Education Act to provide continuing professional development and therefore, it is complementing NBA's efforts.

²³ Rules 11 and 12 of the RPC 2023 explicitly require every legal practitioner to comply with CPD obligations as a prerequisite to being in good standing; Obtain an Annual Practising Certificate issued under the authority of the NBA and have NBA-issued stamps and seals affixed to legal documents, without which the documents are defective.

- vii. Publishing articles in NBA Branch, Institutional, or Faculty Journals (subject to Board approval and CPD credit allocation)

The ability to practice law, represents clients, and be recognized as a legal practitioner in good standing is now inextricably linked to your adherence to the MCPD Rules. No CPD means no practice license, and no practice license means no any NBA stamps. Without these, lawyer's ability to conduct legal business will be severely hampered.²⁴

In line with global best standards, the NBA-ICLE provides a wide array of accredited courses, seminars, workshops, and webinars to help you meet your credit hour requirements with ease and flexibility. Thence compliance with the MCPD Rules is no longer optional. It is a mandatory requirement for all legal practitioners in Nigeria.²⁵

Commendably, the NBA is ensuring that those who do practice law meet evolving professional standards, of which continuous learning is a non-negotiable part globally. Therefore, the NBA works to strengthen ethical standards within the Nigerian Legal system through training and disciplinary measures.

6.1 Ethics under Shariah

In Islam, the word ethic is synonym with the term *adab* and *khuluq*. These two terms denote good behaviour or a standard of conduct to be observed in social interactions.²⁶ In the Holy Quran the term *khuluq* can be found in *Surah al-Qalam* verse 4 when Allah (SWT) says: "And surely you (Prophet Muhammad) have the best form of morals," and in *Surah al-Shu'ara* verse 137 where Allah SWT said: "There is no other than *khuluq* of the ancient". Apart from these, the Prophetic hadith had made reference to ethics and morality where Aisha reported that that "the *Khuluq* (Morals) of the Prophet was based upon the Qur'an". The Quranic dictums and the Prophet's tradition obviously demand that all Muslims have high moral standards of behaviour and a good character regardless of what profession that they hold.²⁷ Suffices to state that lawyers have specialized knowledge in law and are therefore accounted and obligated to observe certain code of ethics in order to gain confidence and to build trust of the general public on the dignity of the profession.²⁸

²⁴ Rules of Professional Conduct for Legal Practitioners 2023, Rules 12(3) (a)-(b). These rules provides that a lawyer, unless he holds an Annual Practicing Certificate issued by the Nigerian Bar Association under this rule, shall not, as a legal practitioner - (a) conduct or take part in any proceedings in the court, judicial tribunal, or panel of enquiry; (b) sign any documents, pleadings, affidavits, depositions, application, instruments, agreements, deeds, letters, memoranda, reports, legal opinions or similar documents and processes; or (c) file any such documents as a legal practitioner legal officer or adviser of any Government Department or Ministry or any company or corporation.

²⁵ See NBA MCPD Rules 2025, Rule 23. This rule and others within the MCPD framework, explicitly outline the requirements for continuous professional development and the consequences of non-compliance, including but not limited to the non-issuance of the annual practice license and, by extension, access to NBA stamps.

²⁶ Mahmud Saedon and Nik Ahmad Kamal. 'Adab al-Qadhi in Daily Activities of a Qadhi'. (1992) 2 (1) *IJU Law Journal* 51. pp. 51-62.

²⁷ For further reading on the concept of ethics in Islam see Abdul Haq Ansari, 'Islamic Ethics: Concept and Prospect', (1989) *American Journal of Social Sciences*, volume 6. No 1.

²⁸ Jabatan Kehakiman, *Shariah Malaysia*. "Arahan Amalan Mahkamah Shariah" No.4 2000.

6.2 Basis of Ethics in Shariah

Islam is a practical system of life and it provides guidance for all walks of life. As a comprehensive religion (*syumul*) Islam covers all aspects of life and this includes Shariah, ethics (*akhlak*), and belief *aqidah*. *Tawhid* is the foundation of Islamic faith²⁹ and forms the basis for the ethical principle of lawyers. Allah says in the Quran³⁰; “Those who remember Allah standing, sitting, and lying down on their sides, and think deeply about the creation of the heavens and the earth, (saying): "Our Lord! You have not created this without purpose, glory to You! Give us salvation from the torment of the Fire”.

The above verse provides the fundamental principle of vicegerency (*khilafah*) in Islam where everything created by Allah has a purpose and human being is created to be the world's vicegerent. The concept of *Tawhid* is a philosophic foundation and seen as an added value to every Muslim in preserving what Allah commands and what He forbids.³¹ Accountability is well enshrined in Shariah. The Quran States; ‘Verily, Allah is Subtle, Well- Aware.”³² Similarly the Quran³³ provides as follows; ‘So, whosoever does good equal to the weight of a speck of dust shall see it. And whosoever does evil equal to the weight of a speck of dust shall see it”. The verse reminds the human being that Allah knows everything even to things that were to be hidden inside a solid rock, not even the weight of a speck of dust in the heavens or on the earth.

These verses of the glorious Quran clearly present an Islamic concept of accountability which indicates that everyone is accountable to the God for his own deeds. As Allah knows everything and all mankind is answerable to Him, the principle of *khilafah*, *amanah*, *taklif* and *al-adl wal Ihsan* that derived forms the supreme concept of *Tawhid* and the foundation of the ethical principles of lawyers in Islam.

6.3 Ethical Principles under Shariah

In the context of lawyers in Nigeria where Shariah Courts are in operation especially in Northern part of Nigeria, legal ethics means rules or codes of conduct which are binding on them by virtue of both the RPC, 2023 as well as what is expected of them in Islam. Under Shariah, Muslim lawyers have the role of upholding justice, truth, and professional ethics according to both Islamic principles and the law of the land. Muslim lawyers work involves defending the rights of clients within the legal system, ensuring legal proceedings are fair, and serving their community and without prejudice to adhering to their faith's guidance, such as the commands in the Quran and Sunnah.

²⁹ Ismail Raji Al-Faruqi, *Al-Tawhid: Its Implications for Thought and Life*, Herndon, Virginia: (1982) The International Institute of Islamic Thought.

³⁰ Q3:191.

³¹ The principle of Tawhid derives important concept of Khilafah, trustee (*Amanah*), accountability (*Taklif*) and justice (*Al- Adl wa al-Ihsan*). As *khilafah*, lawyers are obligated to motivate every member in society towards piety (*taqwa*) to remind them against falsehood, upright the truth and support the oppressed people to against the cruelty. By putting a trust to mankind as a vicegerent, Allah plays active roles to monitor and involve in every affairs of human being and He is aware and knowing everything all the times. Allah says in al-Quran “O my son! If it be (anything) equal to the weight of a grain of mustard seed, and though it be in a rock, or in the heavens or on the earth, Allah will bring it forth.

³² Q31:16.

³³ Q 99: 7-8.

Islam mentions clearly one of the basic ethical principles of the lawyers in the famous hadith narrated by Ummu Salma where the Prophet (PBUH) was reported to have said:

I am only a human being, and you people have disputes. May be someone amongst you can present his case in a more eloquent and convincing manner than the other, and I give my judgment in his favour according to what I hear. Beware! If ever I give (by error) somebody something of his brother's right then he should not take it as I have only, given him a piece of Fire.

This hadith in essence, lays down the principles of advocacy in court whereby a judge heavily relies on the arguments and submissions made by the disputing parties or their representatives. In this case, lawyers must be truthful and honest in conducting cases in court both by argument and as well as the manner of bringing out the evidence.

In Islam, ethics are classified into general ethics and ethics in court whereby the former refers to duty of lawyers to behave accordingly in their daily life and the latter refers to the behaviour in the process of carrying out justice and fair play in court. General ethics require each lawyer not to be influenced by others, not to involve in bribery, not to worry or disturb of litigants and to encourage reconciliation (*sulh*). In court, it is the duty of lawyers to remain calm, not to be influenced by those around them, to give equal treatment, to avoid lengthy proceedings or submissions, to be punctual at all times and due respect to witnesses and the court amongst others. These duties corresponds with the duties under the RPC 2023 relating to courtesy and fairness, to acquire knowledge, duty of diligence and competence, to uphold interest of the client, justice and dignity of the profession, not to appear for party represented by another lawyer, duty of disclosure, to observe confidentiality and to charge reasonable and proper fees.

It is professional conduct to always speak the truth in Islam and under Shariah.³⁴ In *Sura Al-Anbiya*,³⁵ It was stated; '*And God knows what we reveal in our speech and what we conceal*'. Similarly in *Sura al-Fath*,³⁶ Allah (SWT) said; "[t]hey say with their tongues what is not in their hearts."

Prophet is reported to have said that lying carries bad odour that repulses angels.³⁷ Just as unclean foods contaminate the body. Lies also befoul the air and the atmosphere. These internal ethics assist lawyers of faith in purifying written and oral advocacy. The lawyers of faith do not conceal evidence,³⁸ nor do they lie to their clients, opponents, or courts. A court is a place of truth that must not be polluted with lies in civil or criminal cases. Parties, witnesses, and lawyers, particularly when they all are persons of faith, must tell the truth, the whole truth, so that disputes are resolved honestly and efficiently consistent with the Quran's instruction that persons of faith

³⁴ *Sura Al-Imran* 3:95; *Sura Al-Ahzab* 33:4.

³⁵ Q21:110.

³⁶ Q48:11.

³⁷ Encyclopaedia Of Hadith 24 (Maulana Muhammad Razi Khan Afridi ed., Anmol Publications Pvt.Ltd.2007)(citing Imam Tirmidhi).

³⁸ Al-Ghazali discusses few exceptional cases when not telling the whole truth might be allowed. For example, concealing truth will be allowed to save the life of an innocent person. 3 AL-GHAZALI, 48, at 216.

"speak words straight to the point."³⁹ Furthermore, it is not enough to speak the truth. Even the truth must be spoken with good manners. Speaking truth is no license to raise voice or use odious language. The Quran strongly disapproves speaking in a harsh voice and compares harsh voices with the braying of asses⁴⁰

A lawyer without personal integrity may shine for a while, but such a lawyer can have no permanent success as "his light will soon go out in blackness of darkness."⁴¹ New wigs are in particular very eager and under tremendous pressure to make a living and this even when they lack other means to support themselves.⁴² In hardship and struggle for professional survival, a lawyer may consider goodness as a barrier to success.

6.4 The Inseparable Nature of Muslim Lawyer's Personal Life from his Role as an Advocate

The personal life of an advocate is inseparable from his role as an advocate. Privacy is no hideout for lawyers. The lawyer's personal life constitutes the invisible part of his advocacy and the lawyer's character reputation is inseparable from his law practice. For example, a lawyer who commits a criminal act is most likely to lose his trustworthiness. Similarly, a lawyer engaged in conduct involving dishonesty, fraud, deceit or misrepresentation is rarely an effective advocate. Codes of professional responsibility sanction lawyers engaged in criminal or fraudulent activity. In these trying times for the new wigs, "the strictest principles of integrity and honour" offer the best safety.⁴³

7.1 Catalyst for Boosting Lawyers Bid to Engage in Advocacy for Creating the Needed Reforms in the Nigerian

Lawyers bid to engage in advocacy which create the much needed reforms in the Nigerian State would only be meaningful if judges are independent, fair, competent, and of high moral character. It means that judges must have no personal stake in litigation outcomes, as do lawmakers who may lose their seats in the legislature if they act contrary to wishes of the people or campaign contributors. Most secular systems vouch for an independent judiciary and assure judges that no harm would visit them for exercising prudent judicial options. In Nigeria and some other European Countries, these assurances have become and remain mere theoretical constructs of judicial independence. In practical terms, most judges may be unable to overcome their personal prejudices, political preferences, social bonds, and other mental facts that affect decisions.⁴⁴ The Quran commands judges to decide cases between parties "with justice."⁴⁵ In Islam, as in Judaism, however, justice is softened with forgiveness.⁴⁶ Advocacy as a calling to

³⁹ Q34:70.

⁴⁰ Q31:19.

⁴¹ Hon. George S Harswood, *An Essay Professional Ethics* (5th ed., Fred B. Rothman & Co.1993) (1884) at 168.

⁴² Ibid.

⁴³ Ibid.

⁴⁴ Ali Khan, *Suppressive Rulings*, N AT' L L.J., July 24, 2006, at P31 (analyzing why Turkish judges have been attacked for their secular stance against the Islamic scarf). Even the European Court of Human Rights has been criticized for its prejudice against the Islamic scarf. See Carolyn Evans, *The 'Islamic Scarf' in the European Court of Human Rights*, 7 M ELBOURNE J.I NT'L L. 52, 71 (2006).

⁴⁵ Sura Al-Nisa 4:58.

⁴⁶ Lee Taft, 'Apology Subverted: The Co-modification of Apology', 109 *YALE L.J.* 1135,1158 n.105(2000) (citing Ann Kathleen Bradley, 'Seeking Forgiveness in the World's Spiritual Traditions', *Spirituality & H Ealth*, Winter 1999, at 29).

dismantle injustices lies at the core of Islamic faith. "I will not become a witness for injustice"⁴⁷ is its defining attribute. Justice should be rendered to the rightful party.

In the political sphere, as lawyers in our professional areas of calling, we should endeavour to ensure that political parties comply with all the relevant laws within the sphere of our political environment. Some politicians would readily argue that Politics is a dirty game and as such engage themselves in everything thing to drive home this point. This is however incorrect. Politics is never a dirty game. It is the players who are dirty and they inflict their faith on their members and by implication, on the society and unfortunately some lawyers have caved into this believe and work towards it. N.S. Ngwuta, JSC (as he then was and of blessed memory) brilliantly summarized the position in the case of *CPC v. OMBUGADU*⁴⁸ as follows;

"There is a popular saying that politics is a dirty game. I do not share this view. It is the players who are dirty and they inflict their faith on their members and by implication, on the society. Politicians must learn to play the game of politics in strict compliance with its rules and the rules of organized society"⁴⁹

Nothing can override the need for Muslim lawyers to insist in ensuring that political parties comply with the provisions of the law and guidelines for the conduct of elections. Political parties are creation of section 221 of the Constitution of the Federal Republic of Nigeria, 1999 (as altered).

The same 1999 Constitution in section 222 imposes duty on political parties. Nothing in a party's constitution can override or be superior to the constitution of Nigeria and the laws validly enacted by the authority of the Nigeria constitution.

8.1 Areas of Convergence and Divergence between the RPC 2023 and Shariah Etiquettes

The following are the areas of convergence and divergence between the RPC 2023 and Shariah Etiquettes:

- i. The RPC, 2023 governs all Nigerian lawyers while Shariah courts handle personal-law matters in the 12 Northern States. The implication is that when a lawyer appears in a Shariah court, the RPC, 2023 still applies, but the court's Islamic Procedural Rules (e.g., oath-taking, evidence standards) may differ.
- ii. Rule 1 of the RPC, 2023 demands the "upholding of the rule of law" and "maintaining a high standard of professional conduct". In the case of a Shariah-practicing lawyer, he must also respect Islamic ethical norms like, confidentiality, fairness which largely overlap with the RPC, 2023, yet any RPC requirement that contradicts a Qur'anic injunction i.e. relating to certain interest-based transactions, create a compliance tug-of-war. Thus, there is likely to be conflict between Ethics and religious duties.

⁴⁷"Narrated An-Nu'man bin Bashir: My mother asked my father to present me a gift from his property; and he gave it to me after some hesitation. My mother said that she would not be satisfied unless the Prophet was made a witness to it. I being a young boy, my father held me by the hand and took me to the Prophet. 26(2013) 55 NSCQR 575.

⁴⁸ (2013) 55 NSCQR 575.

⁴⁹ Ibid, p. 582.

- iii. In relation to client confidentiality, Rule 19 of the RPC, 2023 enshrines attorney-client privilege; Shariah also protects secret communications, but Shariah courts may order disclosure if the matter involves a *hudud* crime. Lawyers must navigate both regimes without breaching either.
- iv. Rule 17 of the RPC, 2023 deals with Conflict of interest and demands full disclosure of any competing interest. In Shariah-related cases, a lawyer's family or tribal ties can be a Shariah consideration relating to conflict of interest. Failure to disclose both RPC and Shariah conflicts can lead to disciplinary action in both systems.
- v. On the thorny issue of fees & remuneration, Rule 48 of the RPC, 2023 ties fees to the Remuneration Order 2025 and forbids "illegal or clearly excessive" fees. Shariah permits "*ujra*" (service fees) but prohibits *riba* (interest). Fee structures in legal practice under Shariah must be Shariah-compliant i.e. flat fee(s), profit-sharing while still satisfying the RPC's "reasonable" standard.
- vi. The new chapter two of the RPC, 2023 dealing with Anti-Money-Laundering (AML) & Terrorism Financing captured under Rules 55-72 imposes risk-based due diligence, record-keeping, and reporting duties. Shariah-compliant clients often involve Islamic finance transactions. Even at that, lawyers must still conduct CDD (Client Due Diligence) on beneficial owners and flag suspicious transactions even when the underlying contract uses *murabahah* or *mudarabah* structures.
- vii. With respect to courtroom conduct, Rules 31-38 of the RPC, 2023 gave details about decorum, candour, and respect for the court. Shariah courts have specific etiquettes i.e. gender segregation, prayer times etc. A lawyer must adjust his demeanour without compromising RPC duties e.g., standing when the judge enters, yet observing modesty requirements.
- viii. In dispute resolution, Shariah encourages *sulh* (mediation) and *tahkim* (arbitration). The RPC, 2023 does not bar ADR. In fact, Rule 15 encourages representation within the bounds of the law, which includes honouring a client's wish for Shariah-based settlement while ensuring any agreement complies with Nigerian statutes.
- ix. There are operational hurdles. Practitioners often need dual training: a Nigerian legal qualification plus Shariah jurisprudential knowledge. Firms must also maintain separate record-keeping systems: one for RPC-mandated client registers and another for Shariah-compliant transaction logs.

From the above, it can be discerned that the RPC, 2023 sets the baseline for professional conduct across Nigeria; Shariah adds additional religious and procedural layers. Successful lawyers blend the two by:

- 1. Identifying any RPC-Shariah conflict early,
- 2. Seeking client consent for dual-system compliance,
- 3. Documenting both RPC-required disclosures and Shariah-required disclosures, and
- 4. Leveraging the NBA's AML guidelines while respecting Shariah finance principles.

9.1 Navigating Through Legal, Ethical, and Operational Challenges

Navigating through legal, ethical, and operational challenges in relation to Rules of the RPC, 2023 and Shariah in Nigeria requires a nuanced approach. This can be surmounted by:

1. Understanding the overlap between the RPC, 2023 and Shariah Principles. In this case, lawyers need to familiarize themselves with both RPC, 2023 and Shariah principles to identify potential conflicts.
2. Seek guidance from those who are more knowledgeable. It is advocated that lawyers consult with experienced lawyers, Shariah scholars, or regulatory bodies (e.g., NBA) for clarity.
3. Document decisions by keeping records of decisions and rationale to demonstrate compliance with both systems.
4. Invest in training on Shariah and RPC, 2023 to ensure competence in both areas.
5. Obtain informed consent from clients regarding dual-system compliance and potential conflicts.
6. Uphold professional integrity and avoid actions that could be perceived as compromising either RPC or Shariah principles.
7. Leverage in technology by utilizing software and tools that accommodate both RPC and Shariah requirements.
8. Collaborate with experts i.e. with Shariah scholars, accountants, and other experts to ensure compliance.
9. Have respect for both systems i.e. both RPC, 2023 and Shariah principles.
10. Maintain transparency in dealings and decisions.
11. Prioritize client interests while ensuring compliance with both systems.

By adopting these strategies, lawyers and professionals can effectively navigate the complexities of RPC, 2023 and Shariah in Nigeria.

10.1 Obstacles to Legal Practice in Nigeria

A lawyer is only a lawyer proper so called only within a defined geographical territory and the courts sitting within that territory. In Nigeria, the right to licence to engage in legal practice is defined by the Legal Practitioners Act. A lawyer's licence to practice law is only cognizable within the country or state that grants it with the effect that no lawyer can engage in legal practice outside the country or state in which he is licenced except by express authorization. There is therefore nothing like a global lawyer with the right to practice in national jurisdictions across the globe except as permitted under statute.

A community reading of Sections 2(1) and 24 of the LPA⁵⁰ would lead inescapably to the conclusion that it is only a person whose name is in the roll of legal practitioners in Nigeria that can engage in legal practice in the country. This much was explained by his Lordship, Onnoghen, J.S.C. in *Okafor v Nweke*⁵¹ that: "The combined effect of the above provisions is that for a person to be qualified to practice as a legal practitioner, he must have his name in the roll otherwise he cannot engage in any form of legal practice in Nigeria."⁵²

⁵⁰ Laws of the Federation of Nigeria 2004.

⁵¹ (2007) 3 SCNJ 185 or (2007) All FWLR (Pt.368) 1016.

⁵² Ibid, per Tom Shaibu Yakubu, JCA at Pp 102 - 103 paras D – C.

The Supreme Court of Nigeria had laid the matter to rest in the case of *Dankwambo v Abubakar & ORS*⁵³ posited thus;

In the Legal Profession, apart from a University Law Degree, a person seeking to practice law as a legal practitioner in Nigeria must proceed to the Law School, pass the qualifying examinations and be called to the Bar. Both the Bar Examinations, and Call to Bar are issued Certificates. Apart from that, by Section 2(1) of the Legal Practitioners Act alluded to above such a person must be enrolled in the Register of Legal Practitioners at the Supreme Court. All these steps are taken to avoid identity theft, ward off quacks and make sure that the profession is not hijacked by "fake" lawyers. There is therefore, the need for legal Practitioners to be careful when signing official documents to adhere to the names they are officially known. Legal Practitioners, like every other professionals are true to use names which they consider proper in social circles but when it comes to officialdom, in order to eliminate all doubts, they should try to use names they willingly submitted for enrolment.⁵⁴

This pronouncement extends to the interpretation of section 36(6) (c) of the Federation of Nigeria, 1999 (as amended) to the extent that the section does not contemplate legal representation by a person that is not qualified to practice in Nigerian law courts and who suffers legal disability. Hence, the choice of a foreign lawyer by a defendant facing criminal trial in Nigerian court is outside the contemplation section 36(6) (c) of the Federation of Nigeria, 1999 (as amended). This restriction was clearly stated by Udo Udoma J (as he then was) in *Chief Awolowo v Federal Minister of Internal Affairs*,⁵⁵ posited thus;

... The Constitution is a Nigerian Constitution, meant for Nigerians in Nigeria. It only runs in Nigeria. The natural consequences of this are that the legal representative contemplated in s. 21(5) (c) ought to be someone in Nigeria and not outside it... This provision is subject to certain limitations. It is clear that any legal representative chosen must not be under a disability of any kind. He must be someone who. If outside Nigeria, can enter the country as of right; and he must be someone enrolled to practice in Nigeria. For if the legal representative chosen cannot enter into Nigeria as of right, and he has no right of audience in Nigerian courts, then he is under liability. In both cases the legal representative chosen would run the risk of being refused entry into Nigeria by the Immigration Authority, and of being refused enrolment by the Chief Justice of the Federation...

⁵³ (2015) LPELR-25716(SC).

⁵⁴ Ibid, per John Inyang Okoro, JSC at Pp 75 - 76 paras E – C.

⁵⁵ (1962) L. L. R. 177.

It may however appear that with the LPA currently undergoing amendments at the National Assembly, and by virtue of the proposed Legal Practitioners (Amendment) Bill 2025, it now makes provision for outsourcing of legal services by offshore law firms to local law firms which require some form of alliance or networking between the host law firm and the offshore law firm including a formal partnership. The advantage of this model of legal practice is that the host lawyers are better equipped to apply their knowledge of local law and regulations in dealing with the issues entrusted to them. By the provisions of the Legal Practitioners (Amendment) Bill 2025⁵⁶, foreigners may now practice in Nigeria subject to them having the requisite license to be issued by the Body of Benchers and passing the prescribed examinations as well as first enter into partnership or collaboration agreement with a legal practitioner duly acknowledged to practice law in Nigeria. The advantage of this model of globalized legal practice is that the host lawyers are better equipped to apply their knowledge of local law and regulations in dealing with the issues entrusted to them.

The introduction of the Stamp and Seal for lawyers in Nigeria is another inhibiting factor on legal practice in Nigeria. Rule 10 (1) of the RPC, 2023 provides thus; ‘A lawyer acting in his capacity as a legal officer or adviser of any Government department or ministry or any corporation, shall not sign or file a legal document unless there is affixed on any such document a seal and stamp approved by the Nigerian Bar Association’. Rule 10 (2) of the RPC, 2023 defines the term ‘legal documents’ to include; pleadings, affidavits, depositions, applications, instruments, agreements, deeds, letters, memoranda, reports, legal opinions or any similar documents’. The effect of non – compliance is that any legal document signed or filed by a lawyer in contravention of Rule 10 (1) shall be deemed not to have been properly signed or filed.

From the above, it is evident that persons not called to the Nigerian Bar and enrolled at the Supreme Court of Nigeria or foreigners granted the requisite licenses and passing the prescribed exams and entering into partnership in Nigeria, cannot sign, frank and or file legal documents as defined under Rule 10(2) of the RPC, 2023. Invariably speaking therefore, persons who are qualified to practice law in other jurisdictions but not qualified in Nigeria cannot undertake any form of legal practice or documentations in Nigeria.⁵⁷ Because of the fused system of the legal profession in Nigeria, a foreign lawyer who has no right of audience before a Nigerian court is also precluded and or barred from undertaking any form of solicitor’s work. It is equally doubtful whether an offshore law firm can incorporate a representative office in Nigeria in its own name under the Companies and Allied Matters Act since part of the requirements for the registration of law firms is the production of the certificates of call to bar of at least the principal members of the firm.

Poor investment by the state in the development of information communication technology which gives rise to limited access to internet service and unpredictably poor quality of existing internet services in Nigeria have impacted negatively in the capacities of home lawyers to participate in the global legal market. Poor internet access could jeopardize networking between Nigeria lawyers and foreign lawyers and thus hamper the outsourcing of legal services by offshore law firms apart from constraining the access of Nigerian lawyers to the global market.

⁵⁶ Legal Practitioners (Amendment) Bill 2025, ss. 30(2) & 30 (3).

⁵⁷ *Okafor v Nweke* (n 51).

11.1 Legislative and Policy Considerations Guide

The following legislative and policy considerations guide are imperative to wit:

- a. Arising from the evolving landscape of legal ethics, there is a pressing need for the proposed Legal Practitioners (Amendment) Bill 2025 subject to the public hearing that it will be subjected to, to be passed into law as an Act of the National Assembly as it provides a transparent, robust the needed enhanced accountability and disciplinary mechanisms to ensure the integrity of legal professionals aimed at maintaining public trust and upholding the ethical standards of the legal profession.
- b. Recognizing the dynamic nature of legal practice, continuous legal education and training in legal ethics must continually be enhanced. There should be the potential integration of ethics education into legal curricula and professional development programs, emphasizing the role of on-going learning in fostering a culture of ethical conduct among legal practitioners. This will encourage the cultivation of a heightened ethical consciousness.
- c. As technological advancements reshape the legal landscape, there is a need for proactive legislative responses to address emerging ethical challenges. Lawmakers should consider drafting legislation that balances innovation with ethical considerations and the responsible use of emerging technologies.
- d. One can hardly see good indications of Nigeria's legal practice embracing the institutionalized legal culture through active participation of its members in International Bar Associations activities and CPD Programmes across the world. Partnerships need to be developed with other firms with global reach as South African law firms are currently doing.
- e. There is the need for continuous efforts in research, education and policy development to address identified challenges. Legal scholars, practitioners, and policymakers should undertake rigorous research that contributes to a deeper understanding of emerging ethical issues.
- f. Nigeria's legal education and training needs to be strengthened so that future lawyers can have a good grasp of the knowledge, skills and ethics underpinning the system and practice of laws which involves the rich and complex interplay of private, international and domestic law.

12. Conclusion

Ethics is not a new phenomenon. It has existed over time and propelled over time. Without ethics, the practice of law loses its moral compass and credibility. The society gauges the legal profession by the attitude of lawyers in and out of the court room. It is crucial that ethical issues are being part of everyday life discussion among lawyers. If in doubt of how to act, one should always ask oneself these crucial questions:

- i. Did I fulfil my duties and obligations as a lawyer?
- ii. Did I feel inside myself like a moral person?
- iii. How would this look in the eyes of the public?

The NBA-ICLE aims to elevate the standards of professionalism within the legal profession. Compliance with the Minimum Continuing Professional Development (MCPD) should be not be viewed by lawyers as a burden, but as a hallmark of professional integrity. The RPC Rules should be a walking companion for all lawyers while breaches should be reported to the

appropriate disciplinary body and the suggestions proffered on how to navigate through legal, ethical and operational challenges will boost legal practice in Nigeria.