



ROLE OF BAR COUNCIL OF INDIA IN REGULATION AND PROMOTION OF LEGAL EDUCATION IN INDIA

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ABSTRACT:

Legal Education, as an aspect of professional education, has assumed considerable importance in the context of globalisation. Legal education is a vital link in the creation of knowledge concepts, as also in the application of the same in society. The need for trained law personnel has increased significantly over the last few years and, consequently, there is a need to articulate a clear long term vision on legal education in India. The Bar Council of India is statutorily mandated to play a significant/paramount role in regulation of legal education as well and the Bar Council of India, as a regulatory body, has requisite powers to play a constructive role in the direction of making qualitative improvement of legal education in India. This paper makes an attempt to highlight significant contribution made by the Bar Council of India in promotion of legal education in India, in exercise of the said mandate. The paper also highlights the fact some of the positive actions undertaken by the Bar Council of India are still a nascent stage and have to be brought to their logical conclusion. This paper endeavours to make a case that the Bar Council of India has to exhibit necessary vision and direction in order to put in place effective framework for reforming and developing the legal education sector in India.



KEYWORDS: Bar Council , legal education , logical conclusion.

INTRODUCTION

The responsibility of the Bar Council of India also extends to regulation of legal education as well. The significance of the role played by the Bar Council of India in this regard has been noted by the first Law Commission of India in its 14th Report, titled 'Reforms of Judicial Administration'¹, submitted in the year 1958. Anticipating the introduction of an All India Bar Council, which ultimately took the shape in the form of the Bar Council of India, the Law Commission observed:

¹ **The 14th Report of the Law Commission of India, titled 'Reforms of Judicial Administration'**, can be accessed at:

<https://cdnbbsr.s3waas.gov.in/s3ca0daec69b5adc880fb464895726dbdf/uploads/2022/08/2022080514.pdf> and

<https://cdnbbsr.s3waas.gov.in/s3ca0daec69b5adc880fb464895726dbdf/uploads/2022/08/2022080541-2.pdf>.

“One of the main subjects to which the All-India Bar Committee of 1953 gave its attention was the formation of a unified Indian Bar. The Committee had made detailed and practical recommendations which envisaged a common roll of advocates for the whole country with liberty to practice in all parts of the country. **It considered the qualifications for admission to the common roll of advocates and recognized the need for co-ordination between the professional bodies which would impart practical instruction in law, hold examinations in it and thus regulate admission to the Bar and the Universities which would deal with the academic side of legal education. For achieving this end, it is suggested that the All- India Bar Council which was to consist of representatives of the various State Bar Councils should have a Legal Education Committee of twelve persons. The Committee was to consist of two judges, five persons to be elected by the All-India Bar Council and five other persons from the Universities co-opted by these seven members.**

We understand that legislation on the lines suggested by the All-India Bar Committee is on the anvil. **It appears to us that the object of achieving a uniform standard of legal education for admission to the Bar will be equally, if not better, served by this recommendation of the All-India Bar Committee.** The unnecessary multiplication of statutory and other bodies is a feature common in our country and needs to be avoided.

We have already seen how in England professional legal education and the admission to the profession are controlled by a body consisting exclusively of professional men. There is no reason why a similar control and regulation should not be vested in the profession in India. Co-ordination between the bodies regulating professional training and the Universities with a view to ensuring minimum standards can be achieved in the manner indicated above. In our view, the Legal Education Committee of the All-India Bar Council may be empowered to keep itself in touch with the standards of legal education imparted at the various Universities by visits and inspection as in the case of the medical and dental professions or as is done by the American Bar Association in the case of the American Law Schools. If the Council or its Committee is of the view that the standards prescribed by a particular University in legal education are not adequate or that institutions established by it or affiliated to it for imparting legal education are not well equipped or properly run, it may decide to refuse admission of the graduates of that University to the professional examination till the University has taken steps to reach the minimum standards.”
[Emphasis added]

Statutory mandate *qua* Bar Council of India’s role in promotion of legal education

The Bar Council of India is statutorily mandated “to promote legal education and to lay down standards of such education” in India in view of the provisions contained in sub-section 1 (h) of Section 7 of the Advocates Act, 1961.

The said statutory provision further provides that in discharge of the function, the Bar Council of India shall hold “consultation with the Universities in India imparting such education and the State Bar Councils”.

Additionally, sub-section 1 (i) of Section 7 of the Advocates Act, 1961 empowers the Bar Council of India “to recognise Universities whose degree in law shall be a qualification for enrolments as an advocate and for that purpose to visit and inspect Universities or cause the State Bar Councils to visit and inspect Universities in accordance with such directions as it may give in this behalf”.

To this end, sub-section 2 (b) of Section 10 of the Advocates Act, 1961 mandates that the Bar Council of India shall constitute a standing committee on legal education consisting of ten members, of whom five shall be persons elected by the Council from amongst its members and five shall be persons co-opted by the Council who are not members thereof.

Section 49 of the Advocates Act, 1961, in sub-sections (1)(af),(ag), (d) and (e) provides for the rule making power of the Bar Council of India with respect to the following matters relating to legal education:

- i) the minimum qualifications required for admission to a course of degree in law in any recognised University;
- ii) the class or category of persons entitled to be enrolled as advocates;
- iii) the standards of legal education to be observed by Universities in India and the inspection of Universities for that purpose; and
- iv) the foreign qualifications in law obtained by persons other than citizens of India which shall be recognised for the purpose of admission as an advocate under the Act.

The Supreme Court of India in **Bar Council of India v. Board of Management, Dayanand College of Law**², after extensive analysis of the statutory powers of the Bar Council of India under the Act and the Rules framed thereunder, concluded that since the Bar Council of India is concerned with the standards of the legal profession and the equipment of those who seek entry into that profession, therefore, it is also concerned with the legal education in India. It was held thus:

“9. [t]he Bar Council of India retains adequate power to control the course of studies in law, the power of inspection, the power of recognition of degrees and the power to deny enrolment to law degree holders, unless the University from which they pass out is recognized by the Bar Council of India.

12. ...It may not be correct to say that the Bar Council of India is totally unconcerned with the legal education, though primarily legal education may also be within the province of Universities. But, as the apex professional body, the Bar Council of India is concerned with the standards of the legal profession and the equipment of those who seek entry into that profession. The Bar Council of India is also thus concerned with the legal education in the country.”

Steps taken by Bar Council of India for promotion of legal education in India.

The Bar Council of India, in discharge of its above-mentioned statutory responsibilities, has taken several important steps for promotion and development of legal education in India, which are discussed herein after.

a) Bar Council of India Trust

The Bar Council of India Trust was established by the Bar Council of India, on 27 April, 1974, as a public charitable trust, with the objective of maintaining professional standards in the legal profession and effecting improvements in legal education. Towards this end, the Trust is mandated to establish law schools of excellence and to promote legal research.

Some of the important activities being carried on by the Trust, in the context of promotion of legal education in India, are:

- i) publication of textbooks for students and law reports. The Trust has been publishing the Indian Bar Review since the year 1972 and constitutes an important source of latest trends, developments and scholarship in the field of law and legal education;
- ii) establishment of world-class instruction in law. The Trust established the first national law university in the year 1987, details whereof are discussed in subsequent part of this chapter;
- iii) organisation of National Moot Court Competitions, in association with Indian universities, with the objective of promoting advocacy skills amongst law students; and

² **Bar Council of India v. Board of Management, Dayanand College of Law reported in (2007) 2 SCC 202.**

- iv) continuing legal education, with updating the knowledge, skills and resources, including organisation of workshops on varied topics of law. The Trust has also assembled high-quality reading materials on different subjects of law.

b) Establishment of National Law Universities

The subject of regulation of legal education in India, especially when the same is imparted through the traditional university system, falls within the conjoint domain of the Bar Council of India and the University Grants Commission. Consequently, it was not effectively possible for the Bar Council of India to bring about radical reforms in legal education, despite calls for reforms from all quarters of the country in view of the falling standards of the legal profession.

In view of mounting pressures on the Bar Council of India to change the way legal education is imparted in India, first concrete decision to reform legal education was taken in the year 1984, when various proposals for modernisation of legal education were considered and approved by the Legal Education Committee of the Bar Council of India.

One such proposal was the decision to establish specialised institutions to impart legal education in an integrated and diversified manner, with the aim to revitalise the legal profession, by making law an attractive and competitive profession in order to attract talent. Consequently, the late 1980's saw a crucial milestone in the development of professional legal education in India with the establishment of the National Law School of India University, Bangalore in the year 1987³. This marked the success of the Bar Council of India's efforts to introduce the concept of five year integrated double degree course for the study of law to complement the traditional three year degree course.

This model has since been adopted by many States and as of date there are a total of 24 National Law Universities, which have been established through State legislations, are in existence in India.⁴

c) Bar Council of India Legal Education Rules

In exercise of its rule making powers under Section 49 of the Advocates Act, 1961, the Bar Council of India has enacted the '**Rules on Standards of Legal Education and Recognition of Degrees in Law for the purpose of enrolment as advocates and inspection of Universities for recognizing its degrees in law**' ("**the 2008 Rules**"), which were approved and adopted by the Bar Council of India at its meeting held on 14 September, 2008, vide resolution no. 110 of 2008, in consultation with the State Bar Councils⁵.

The 2008 Rules deal with the standards of legal education and recognition of degrees in law for the purpose of enrolment as advocate and inspection of Universities for recognizing its degree in law under Section 7(1)(h) and (i), Section 24(1)(c)(iii) and (iia) and Section 49(1)(af),(ag) and (d) of the Act.

Sub-rule (iv) of Rule 2 of the 2008 Rules recognise institutions imparting legal instruction in the form of "Centres of Legal Education", thereby including all approved Department of Law of the

³ The National Law School of India University, Bangalore was established under the National Law School of India Act, 1986 passed by the Legislative Assembly of the State of Karnataka. The said legislation was notified in the official Gazette on 29 August, 1987.

⁴ Majority of the said National Law Universities conduct admission through an all-India common entrance examination, viz., the Common Law Admission Test (CLAT). Admission to other National Law Universities is through all-India entrance examination conducted by the concerned university. In this regard, it is pertinent to mention that the all-India common entrance examination system for admission into National Law Universities was introduced pursuant to directions of the Supreme Court of India passed in the matter of Writ Petition (Civil) No. 68 of 2006 titled Varun Bhagat v. Union of India and Others.

⁵ The Bar Council of India Rules of Legal Education, 2008 were preceded by the Bar Council of India Rules of Legal Education, 1998. The 2008 Rules were introduced to comprehensively deal with a number of matters relating to legal education, which were not addressed in the 1998 Rules.

Universities, Colleges of Law, Constituent Colleges under the recognised Universities and affiliated Colleges and/or Schools of law of recognised Universities duly approved, as also National Law Universities constituted and established by Central/State statutes and mandated to start and run law courses.⁶

Sub-rule (xvi) of Rule 2 of the 2008 Rules provides for the composition of the Legal Education Committee of the Bar Council of India, as constituted under sub-section (2) (b) of Section 10 of the Advocates Act, 1961. The Committee shall consist of five (5) members of the Bar Council of India, to be nominated by the Bar Council of India, and five (5) co-opted members comprising a former Judge of the Supreme Court of India as the Chairman, a sitting Judge of a High Court, a distinguished Professor of Law, the Chairman of the University Grants Commission and the Secretary, Ministry of Law and Justice.

The 2008 Rules are divided into four (4) parts and make elaborate provisions with respect to the following matters:

- i) Chapter II of the 2008 Rules deals with Standards of Professional Legal Education;
- ii) Chapter III of the 2008 Rules contains provisions regarding Inspection, Recognition and Accreditation of law universities and law colleges;
- iii) Chapter IV of the 2008 Rules deals with the establishment of a Directorate of Legal Education; and
- iv) Chapter V of the 2008 Rules provides for Recognition of a Degree in Law of a Foreign University.

In the year 2019, the Bar Council of India proposed substitution of the said Rules with “**the Legal Education Rules, 2019**”, for promoting and coordinating legal education, in view of:

- a) rapid global integration of legal regulations for trade, commerce and Industries and technological innovations in global economy;
- b) the need for national laws to be more sensitive to the international human rights legal principles;
- c) necessity of emphasis on clinical skill training, both in court room litigation management and in alternate dispute resolution mechanism, for the Professional legal education in the interest of speedy delivering justice; and
- d) need for emphasis on super-specialisations in various branches of law; to upgrade the curricula, owing to latest developments and achieve optimum efficiency thereby.⁷

d) Bar Council of India’s Curriculum Development Committee

One of the important steps taken by the Bar Council of India for Standardisation of legal education in India was the constitution of a Curriculum Development Committee to design a standard curriculum of various courses to be run by the law institutes across India.

The first Curriculum Development Committee of the Bar Council of India⁸, constituted for the purpose of facilitating Universities and Institutions to formulate the course design in various courses in Law, Social Sciences, English Language, Science, Management and Commerce courses for both Unitary

⁶ It is important to point out that under the proviso to the sub-rule (iv) of Rule 2 of the 2008 Rules, a Department or College or Institution conducting correspondence courses through distance education has been excluded from the definition, thereby limiting legal instruction to first-person teaching.

⁷ **Bar Council of India, Draft Rules of Legal Education, 2019**, Preamble.

⁸ The first Curriculum Development Committee of the Bar Council of India consisted of Professor N.L.Mitra, member of the Legal Education Committee of the Bar Council of India as its Convener and the following members: Mr. J.R.Beniwal, Vice Chairman of the Bar Council of India, Professor Ranbir Singh, Vice Chancellor, National Law University, Delhi, Professor Balraj Chauhan, Vice Chancellor, Ram Manohar Lohia National Law University, Lucknow, Professor Gurjeet Singh, Vice Chancellor, Rajiv Gandhi National Law University, Patiala, Professor M.K.Balachandran, Director, Amity Law School, Delhi, Professor Vijayakumar, United Nations High Commission for Refugees and Chair Professor, NLS, Bangalore and Professor Amar Singh, Former Dean of Himachal Pradesh University, Shimla.

(three year) and Double Degree Integrated (not less than five years) courses, came out with a draft report on 15 February, 2010⁹.

The draft Report of the Committee seeks to provide emphasis on faculty sovereignty in designing and successfully running the relevant courses in the universities, in our regard of the Bar Council of India's policy of non-interference with independence of the faculty.

However, the draft Report expresses the Committee's desire to encourage planning and designing of courses in accordance with the Bar Council of India Education Rules, 2008. To this end, the Committee will provides guidelines and would also assist the university faculties with relevant suggestions and the faculty of the concerned university shall ensure that:

- i) the course design is up-dated each time and keep the study-materials dynamic;
- ii) develop appropriate methodology of teaching-learning based on the object and objectives (variables) of the study; and
- iii) evaluate the standard achieved by the learners without unduly pressurising only the memory level but emphasising the skill of application of law and in detailing the fact analysis with lawyers' analytical precision.

As per the draft Report, the purpose of the above exercise is to ensure customisation of the courses and development of strategy of teaching-learning based on the local resources available to attain maximum result in the context of localised environment.

The draft Report contains preliminary course design, especially in courses to be allocated in the first year of studies in both the Unitary and Double degree integrated courses and exhorts the universities to develop study materials and case-books based on the course design.

In essence, the draft Report contains standard in various subjects for guidance, which shall be considered as suggestive benchmark at the minimum level, and the universities are at liberty to improve upon and prescribe higher standards, which would be taken into consideration for evaluating the national/state accreditation grading of the university/institution concerned by the Bar Council of India's Accreditation Committee.

e) National Legal Knowledge Council

As discussed herein above, the three (3) member Committee constituted by the Supreme Court of India recommended formation of a National Legal Knowledge Council, comprising legal luminaries as well as experts from various socially relevant fields, for the purpose of formulating the policy *vis-à-vis* legal education in India at a national level.

Following up on the above-mentioned recommendation, the National Legal Knowledge Council was constituted, to "oversee continuing reforms of Indian legal education, including inspection and recognition of colleges as well recruitment of members of the faculty", which held its first meeting on 6 February, 2010¹⁰.

⁹ **Draft Report of the first Curriculum Development Committee of the Bar Council of India** can be accessed at:

<http://www.barcouncilofindia.org/wp-content/uploads/2010/06/CurriculumDevComdraftReport.pdf>.

¹⁰ The meeting was attended by, *inter alia*, Hon'ble Mr. Justice AK Ganguly, Judge, Supreme Court of India, Hon'ble Mr. Justice AP Misra, Former Judge, Supreme Court of India, Mr. Gopal Subramaniam, Solicitor General of India, Dr. Vijay Kelkar, Chairman, Thirteenth Finance Commission, Mr. SNP Sinha, Chairman, Bar Council of India, Professor NL Mitra, Former Director, National Law School of India University, Bangalore, Professor Ranbir Singh, Vice Chancellor, National Law University, Delhi, Professor C Rajkumar, Vice Chancellor, Jindal Global Law School, Professor Rammohan Rao, Former Director, IIM Bangalore, Dr. D. Nagraj, Director, NIMHANS, Bangalore, Mr. Saikrishna Rajgopal,

f) Bar Council of India's Note on proposed directions for reform of legal education in India¹¹

On 2 June, 2010, the Bar Council of India issued the "Vision Statement 2010-2012", proposing "ensuring equality before the law and the supremacy of the rule of law in the Indian democracy." The Vision Statement identified the following two (2) areas which demanded immediate attention:

- i) inadequate quality of legal education and infrastructure, and
- ii) lack of relevant skills training to meet with the ever-changing demands of the modern world.

The "Vision Statement 2010-2012" sought to address the above concerns by "creating clear quality standards for legal education and a common entry level standard for entering law schools across the country".

Consequently, the Bar Council of India, in the year 2010, issued a Note on "proposed directions for reform of legal education in India", in furtherance of the objective of improving the standards of legal education and the modernisation of the legal profession in India, as stated in the "Vision Statement 2010-2012".

The Note sets out the Bar Council of India's intention to implement a series of measures, which law institutes across India were required to put in place by the Academic Year 2011-2012. The measures suggested have been stated to have taken into account "the particular needs and circumstances of law schools" and "are based on a study of the history of legal education in the country, and suggestions for the reform of legal education made in the past by various committees, as well as discussions with several professionals and academicians".¹²

The Notes, consequently, proposes the following measures for reform:

- i) institutional reforms;
- ii) reforms in content and structure; and
- iii) measures to improve pedagogy and methods of teaching.

g) All India Bar Examination

It is now a common belief that written Bar examination is a "relatively inexpensive and straightforward method that persuades law colleges to develop curriculum in accordance with contemporary practices, helps keep law schools honest in their evaluations of students, and creates a fair uniform standard which improves the quality of lawyers, judges, and the profession as a whole"¹³.

Consequently, a bar examination is a pre-condition to admission to the Bar in several countries.

In India, the requirement of training with a senior member of the Bar was present even before the enactment of the Advocates Act, 1961, whereby a prospective lawyer was required to 'train' in the chambers of a lawyer for a period of one (1) year, and then appear in an examination comprising the subjects of civil and criminal procedure¹⁴.

Thereafter, sub-section (1) (d) of Section 24 of the Advocates Act, 1961 continued the requirement of apprenticeship for graduate law students. The provision was, however, omitted in the

Advocate, Mr. Dayan Krishnan, Advocate. See, <http://www.barcouncilofindia.org/about/legal-education/national-legal-knowledge-council/>.

¹¹ The Note can be accessed at: <http://www.barcouncilofindia.org/wp-content/uploads/2010/07/LegalEducationReformRecommendations.pdf>.

¹² The Note further stipulates that the Bar Council of India, through its Directorate of Legal Education, also proposes to initiate consultations with academicians and other stakeholders in legal education, so as to ensure that the process of reform of legal education in the country benefits from a continuous consultative process.

¹³ Dale A. Whitman, **Notes from the Joint Working Group Conference: Redefining the Bar Examination, 2005.**

¹⁴ See, **Final Report of the 3 Member Committee on "Reform of Legal Education"**, p. 40.

year 1973, thereby discontinuing the practice. In terms of the said amendment, sub-section (2) (b) of Section 28 of the Advocates Act, 1961, which enabled the State Bar Councils to frame rules regarding training and bar examination, was also omitted.¹⁵

In the year 1994, in order to check the declining standards of the legal profession, Hon'ble Mr. Justice M. N. Venkatachaliah, the then Chief Justice of India, constituted a High-Powered Committee on Legal Education, comprising Hon'ble Mr. Justice A.H. Ahmadi, Hon'ble Mr. Justice B.N. Kirpal and Hon'ble Mr. Justice M. Jaganaddha Rao, which strenuously recommended the re-introduction of the requirement for apprenticeship and a Bar examination. The Bar Council of India (Training) Rules, 1995 were, therefore, framed by the Bar Council of India in furtherance to the mandate of the High Powered Committee.¹⁶

The Bar Council of India (Training) Rules, 1995 were, however, struck down by the Supreme Court of India in **V. Sudheer v. Bar Council of India**¹⁷, wherein it was *inter alia* held that once the express provisions *vis-à-vis* apprenticeship and Bar examination, contained in sub-section (1) (d) of Section 24 and sub-section (2) (b) of Section 28 of the Advocates Act, 1961, has been omitted by way of an express statutory amendment, the requirement could not be re-introduced by way of subordinate legislation, particularly when the rule-making power had also been expressly omitted.

However, a bare perusal of the observations made in paragraph 31 of the judgment of the Supreme Court of India in **V. Sudheer's case** would make it evident that the court was of the considered view that the requirements of apprenticeship and Bar examination were *sine qua non* for the qualitative improvement of the legal profession in India, however, such requirements had to be introduced by way of statutory amendments and not through subordinate legislation.

It has been observed that the requirements of apprenticeship and Bar examination are imperative in ensuring high standards of the legal profession and the introduction of such a requirement would:

- i) prevent law schools from escaping the high standards imposed by the governing legal education;
- ii) promote curriculum reform thus increasing the quality of lawyers;
- iii) incline students to interrelate and connect the subjects studied in school with contextual problems and challenges;
- iv) provide for a more objective scenario of testing knowledge; and
- v) lastly, create a uniform and fair method in granting enrolment to the Bar, and eliminate possibility of subjectivity.¹⁸

Acting upon the above views, the Bar Council of India, in the year 2010, introduced the All India Bar Examination with the objective of "improving the standard of legal profession".

The All India Bar Examination was considered, and approved, by the Bar Council of India at its meeting held on 30 April, 2010. It was decided that it shall be mandatory for all law graduates to take the All India Bar Examination from the academic year 2009-2010 onwards and candidates desirous of appearing in the examination may apply once they have enrolled as "advocates" under Section 24 of the Advocates Act, 1961.¹⁹

¹⁵ Ibid, p. 41.

¹⁶ Ibid.

¹⁷ **V. Sudheer v. Bar Council of India reported in (1999) 3 SCC 176.**

¹⁸ Supra Note 14, pp. 44-45.

¹⁹ *Vide* Bar Council of India's Resolution dated 12 April, 2013, the concept of provisional enrolment and the undertaking was brought into existence whereby the law graduates are initially said to be provisionally enrolled on an undertaking that they will pass the exam within two (2) years of said enrolment. Subsequently, *vide* Bar Council of India's Resolution dated 31 January, 2017, it was clarified that, while the right to practice would only be for two (2) years under a provisional enrolment, the

The All India Bar Examination is certification exam, conducted twice a year by the Bar Council of India, for law graduates willing to start practice of profession as an “advocate”. The examination is conducted in fifty (50) cities, having 140 centres, as an open book exam, with the objective to assess basic level knowledge of the law graduate and lay down minimum benchmark for entering into practice of law, in addition to assessing candidate's analytical skills.

Upon successfully clearing the All India Bar Examination, the law graduate is awarded “certificate of practice” by Bar Council of India, which entitles the person concerned to practice law before the judicial and *quasi* judicial bodies in India.

At this stage, it is pertinent to make a reference to the recent decision, dated 10 February, 2023, of the Supreme Court of India in **Bar Council of India v. Bonnie FOI Law College and Others**²⁰, wherein it has been held that the interdict placed by the judgment in **V. Sudeer’s case** on the powers of the Bar Council of India cannot be sustained and consequently, the said judgment has been held to be not laying down the correct position of law. The Supreme Court has left it to the Bar Council of India to decide whether the All India Bar Examination should be held pre or post enrolment of law graduates as advocates.

CONCLUSION

As would be evident from the above discussion, the Bar Council of India, over the years, has made significant contribution in promotion of legal education in India. In the recent years, the Bar Council of India has taken following concrete steps towards upgradation of standards of legal education in India:

- i) overhauling of the Bar Council of India Education Rules in the year 2008, in order to strengthen the standard of legal education in India, after reviewing the standard of professional legal education in various countries;
- ii) establishment of Legal Education Committee of the Bar Council of India;
- iii) establish the Directorate of Education at the Bar Council of India for conducting Faculty Improvement Program for academics and continuing legal education program for the legal professionals; and
- iv) constitution of a Curriculum Development Committee to design a standard curriculum of various courses to be run by the Law Schools across the nation.

However, some of the positive actions undertaken by the Bar Council of India are still a nascent stage and have to be brought to their logical conclusion. For example:

- i) the proposed “Legal Education Rules, 2019”, and changes sought to be brought about by the same, are yet to be implemented;
- ii) there is no much headway made by the Curriculum Development Committee of the Bar Council of India since submission of its first report in the year 2010;
- iii) similarly, there is ambiguity about the National Legal Knowledge Council constituted by the Bar Council of India and the role played by it in overseeing continuing reforms of legal education in India; and
- iv) a number of changes proposed by the “Vision Statement 2010-2012”, and the Note on “proposed directions for reform of legal education in India”, issued by the Bar Council of India, are yet to be implemented.

concerned individual can continue to take the All India Bar Examination any number of times. In essence, therefore, any person who is provisionally enrolled is allowed to practice for two (2) years, however, he is allowed to take the examination not just for two (2) years, but for any number of times till he passes the examination. The date of reckoning of seniority of the law graduate would be from the date of the provisional enrolment.

²⁰ **Bar Council of India v. Bonnie FOI Law College and Others**, Civil Appeal No. 969 of 2023.

Additionally, further substantial efforts on the part of the Bar Council of India are required for further qualitative improvement of legal education in India, especially in view of the changing times, in order for the Indian legal education sector to match up to its counterparts across the globe.

In conclusion, it is submitted that the Bar Council of India, as a regulatory body, has requisite powers to play a constructive role in the direction of making qualitative improvement of legal education in India. In fact, various rules, guidelines, circulars, directives, etc. framed/issued by the Bar Council of India, in exercise of its statutory powers under the Advocates Act, 1961, provide for substantive framework in this context and the Bar Council of India has to exhibit necessary vision and direction in this regard in order to put in place effective framework for reforming and developing the legal education sector in India.