



CONTINUING LEGAL EDUCATION AS A CONDITION OF PROFESSIONAL COMPETENCE IN THE PUBLIC FUNCTION OF ATTORNEYS – THE CASE OF THE REPUBLIC OF NORTH MACEDONIA IN A COMPARATIVE PERSPECTIVE*

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ABSTRACT

The legal profession plays a vital role in upholding the rule of law and ensuring the proper administration of justice. Its functions extend beyond representing private interests and include safeguarding fundamental rights and maintaining public trust in legal institutions. In Europe, attorneys increasingly fulfil these responsibilities in a context marked by deeper integration, cross-border legal practice and the growing complexity of legal regulation. These developments underscore the importance of professional competence, expertise and ethics as prerequisites for the effective fulfilment of the legal profession's public function.

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This paper examines the significance of continuing legal education as a key instrument for maintaining high professional standards and competence of attorneys, with particular focus on the Republic of North Macedonia. Admission to the profession marks the beginning of a lawyer's professional trajectory. Our position is that it should be assured that further down that professional road, attorneys remain capable of responding to evolving legal, institutional and societal challenges. Continuing Legal Education is therefore essential in enabling lawyers to develop, adapt and refine their professional competence throughout their careers.

The analysis primarily focuses on the legal and institutional framework of continuing legal education for attorneys in North Macedonia. The system is evaluated to see if it effectively promotes professional growth and maintains quality standards in the legal profession.

The study further situates the Macedonian framework within a comparative European perspective, drawing on examples from selected EU Member States, notably Croatia and Germany. These jurisdictions illustrate different approaches to regulating continuing legal education and to balancing professional self-governance, regulatory oversight and academic involvement. While common European values emphasise the public role of attorneys, significant differences remain in institutional design and in the methods employed to ensure sustained professional competence.

The research is based on doctrinal legal analysis and comparative law, complemented by empirical findings from a survey conducted among practising attorneys, representatives of professional organisations, and justice-sector representatives. These insights are used to assess the practical functioning of the existing framework and perceptions of the effectiveness of continuing legal education, and to inform policy recommendations.

The authors conclude that a coherent, principle-based system of continuing legal education is indispensable for preserving public trust, professional credibility and the long-term quality of the legal profession in the Republic of North Macedonia and throughout the broader European legal space.

Keywords: Attorneys' function, Competence, Continuing legal education, Legal profession, Rule of law

1. INTRODUCTION

The legal practice in Europe has transformed in ways that have fundamentally altered the conditions under which professional competence is acquired and maintained. The increased regulatory density, the expansion of supranational legal orders and the practical realities of cross-border legal services have reshaped expectations of attorneys, not only regarding their expertise but also their broader public function. In this context, it is no longer acceptable for professional qualifications to be secured once and remain static throughout a legal career. Competence becomes a dynamic, continuously evolving attribute, directly linked to legal professionals' capacity to respond to ongoing normative, institutional and societal change.

This shift has brought renewed attention to the role of Continuing Legal Education as a structural component of the legal profession. While lifelong learning has long been recognised as a general policy objective within the European educational area,

the need to further develop and implement it within the legal profession remains unmet.¹ Its operationalisation within regulated professions – particularly law – remains uneven and, in many instances, conceptually underdeveloped. Existing systems frequently prioritise formal compliance, measured by participation requirements, over substantive engagement with learning outcomes and demonstrable competence. Such approaches raise legitimate concerns about whether they can effectively support the professional development required in contemporary legal practice.

Within this broader context, the regulation and practice of continuing legal education in the Republic of North Macedonia presents a particularly instructive case. As a jurisdiction undergoing internal reforms and aligning with European standards, it highlights many tensions inherent in existing CLE models. These include balancing formal requirements with substantive skills and dividing responsibilities between regulators and educational providers. This analysis is based on these themes, situating North Macedonia's system within the wider European landscape and assessing its ability to maintain the ongoing competence of legal professionals.

The paper is organised into six further parts. The next section sets out the methodological approach, which combines doctrinal and comparative legal analysis with an empirical component based on a structured survey of practising attorneys and other legal professionals. The third section develops the conceptual foundations of the analysis, examining the public function of attorneys, the evolving notion of professional competence, and the regulatory rationale for continuity in competence development. The fourth section situates the discussion within the European Union legal context, considering the primary and secondary EU sources relevant to attorneys' position, the Court of Justice of the European Union's case law on the legitimacy of professional regulation, and the European Qualifications Framework as part of the EU's broader lifelong-learning architecture. The fifth section turns to a comparative analysis of Germany and Croatia, selected for the contrasting models they offer — a differentiated, principle-driven competence regime on the one hand, and a formal, bar-managed mandatory CLE system on the other. The sixth section examines the Macedonian framework in detail, addressing both the legal foundations of the attorneys' function and the empirical findings on attorneys' positions and experiences with CLE. The final section brings these strands together in a discussion that assesses the Macedonian system against the comparative and European benchmarks and identifies the structural reforms required to move towards a coherent, competence-based model of continuing legal education.

¹ Kasap, J.; Lachner, V.; Zih, N., *Through Legal Education towards European Education Area*, in: Petrašević T.; Duić, D.; Novokmet, A. (eds.), *EU and Comparative Law Issues and Challenges Series*, 2, 2018, pp. 266-267.

2. METHODOLOGICAL APPROACH

The key point of this paper is not to prove that EU law contains a single express rule requiring “lawyers must undergo CLE” that must be transposed into the national context. It does not. The argument is that the various EU legal sources together create a normative environment in which continuous professional competence is indispensable for the performance of attorneys’ public function. This is especially relevant for the Republic of North Macedonia, an accession country expected to align with EU rule-of-law and justice-sector standards.

Thus, the methodological approach adopted in this paper is primarily doctrinal and comparative. It is based on an analysis of the legal and institutional framework governing attorneys’ continuing legal education, interpreted in light of broader European standards and policy developments, including the conceptual foundations of lifelong learning and competence-based qualification systems. This normative assessment is complemented by a comparative perspective, drawing on selected EU Member States to contextualise the Macedonian model and identify points of convergence and divergence in the regulation and implementation of Continuing Legal Education..

In addition to the doctrinal and comparative analyses, the research incorporates an empirical component to capture the system’s practical functioning and the perceptions of its key stakeholders. To this end, a structured questionnaire was designed to examine the attitudes, experiences, and needs of legal professionals regarding continuous professional development and lifelong learning. The survey was distributed to a broad range of legal actors in the Republic of North Macedonia, including judges, prosecutors, attorneys, enforcement agents, corporate lawyers, law clerks, notaries and legal apprentices. It remained open for responses from 1 December 2025 to 28 February 2026, yielding 143 valid responses. Of the respondents, 61 (43%) are attorneys, while 29% are from the judiciary, including 15% judges and 14% court clerks. The majority of respondents are women (64%). In terms of age distribution, the predominant group is 36–45 years (46%), followed by 46–55 years (28%), those over 55 years (15%) and 25–35 years (10%).

Within the group of attorneys ($n = 61$), most respondents fall into the 36–45 age group (31, 50.8%), followed by 6 respondents (9.8%) aged 25–35, 18 (29.5%) aged 46–55, and 6 (9.8%) over 55 years of age. The majority are women, accounting for 35 respondents (57.4%), while 26 (42.6%) are men. In terms of professional experience, most respondents have 7 to 15 years of experience (22, 36.1%), followed by 21 respondents (34.4%) with 15 to 25 years, 13 (21.3%) with over 25 years, 4 (6.6%) with between 3 and 5 years, and 1 respondent (1.6%) with less than 3 years of experience in the legal profession.

Several limitations of the empirical component of this study should be noted. The sample size is modest relative to the total number of practising attorneys in the country² and respondents were not drawn through probability sampling, which limits representativeness across years of practice, specialisation, and geographic location. As the data were collected via a self-administered questionnaire, the findings are also subject to self-reporting bias, including social desirability and subjective interpretation of CLE-related concepts. For these reasons, generalisability to the wider attorney population is limited. To mitigate this, semi-structured interviews were conducted with practising attorneys to validate the findings. The results are therefore presented as indicative rather than conclusive, but they provide a relevant basis for assessing attorneys' positions towards CLE.

3. PROFESSIONAL COMPETENCE IN THE PUBLIC FUNCTION OF ATTORNEYS

The legal profession is constantly evolving from 'traditional advocacy to a more nuanced function centred on systemic governance.'³ On the one hand, lawyers manage cases, offer legal aid and resolve others' legal issues and disputes. On the other hand, they develop ideas to resolve conflicting values that are significant to individuals and communities and provide guidelines for public life through norm-setting activities.⁴ This shift requires legal professionals to move beyond the narrow "hired gun" role focused solely on maximising client interests and to actively contribute to building accountable and responsive systems of governance,⁵ thereby fulfilling their public function.

3.1. Attorneys as Actors in the Administration of Justice

Attorneys perform a dual role as they are hired to represent and advance their clients' interests, while also serving as officers of the legal system and public citizens who bear a special responsibility to uphold and enhance the quality of justice.⁶

² The total number of registered practicing attorneys, according to the Bar Chamber database, is estimated to be over 3000, Available at: [<https://www.mba.org.mk/index.php/mk/imenik-advokati/imenik-aktivni-advokati>], Accessed 13 March 2026.

³ Dube, I.; Assumi, S Elika., *Cultivating Versatility in Legal Education: Comprehensive Institutional Development Initiatives*, NLUJ Law Review, Vol. 11(1), No. 178, 2024, p. 183.

⁴ Karsai, K., *The Future of Legal Education - Legal Education for the Future: Lectio Magistralis - An Edited Version*, Revista Facultatii de Drept Oradea, Vol. 2022, No. 2, 2022, pp. 7-15.

⁵ Romeo, A., *The Attorney-Client Privilege: Grounding Confidentiality in Legal Theory*, Rechtstheorie, Vol. 48, No. 2, 2017, p. 253.

⁶ See: Romeo, A., *op. cit.* note 6, p. 236; Wald, Eli., *Law, Lawyers and the Battle Against Antisemitism*, 2025, Available at:

This approach requires lawyers to balance their clients' goals with ethical duties and the fundamental values of a democratic society. Accordingly, professional competence is a crucial prerequisite for the effective administration of justice and the protection of human rights.⁷

Legal practitioners are seen as key contributors to systems that operate transparently, responsibly and fairly, moving beyond a narrow focus on individual client interests toward working with others to solve problems and uphold the public good.⁸ Their public function is emphasised especially in transitional societies where the legal system helps promote democratisation and social progress.⁹

Continuing legal education is crucial in that regard, as it maintains the competencies lawyers need to defend human rights effectively and support the legal system's role in promoting democratisation and social progress. This is especially important, as legal practice nowadays increasingly requires skills in policy design, stakeholder negotiation and the ability to adapt to evolving circumstances.¹⁰

Within the public function of a lawyer, competence serves as a condition of access to justice, primarily because a client's mere presence would be insufficient if the lawyer lacked the required skills. Furthermore, to provide effective access to justice, lawyers must continuously improve professionally to integrate international standards and the practice of European bodies. Therefore, continuous professional development is viewed not just as a tool for career enhancement but as a responsibility to ensure the fair administration of justice.¹¹

3.2. The Concept of Professional Competence

In today's legal environment, professional competence is gradually seen as a degree of an individual's capacity to carry out demanding duties, rather than as a binary condition of being "qualified" or "unqualified".¹² This evolution reframes compe-

[<https://legalpro.jotwell.com/law-lawyers-and-the-battle-against-antisemitism/>], Accessed 6 April 2026.

⁷ Dryshliuk, V., *et al.*, *Application of the practice of the ECHR in legal education: impact on the formation of judicial culture and the protection of human rights*, Revista Eduweb, 2025, Vol. 19, No. 2, pp. 107-121, p. 108.

⁸ Dube, I.; Assumi, S Elika., *op. cit.* note 4, p. 183.

⁹ Dryshliuk, V., *et al.*, *op. cit.* note 8, p. 110.

¹⁰ Dube, I.; Assumi, S Elika., *op. cit.* note 4, p. 183.

¹¹ Counsel Pulse, *Staying Ahead of the Curve: The Role of Continuous Learning in Legal Professional Development*, Available at:

[<https://counsellpulse.com/staying-ahead-of-the-curve-the-role-of-continuous-learning-in-legal-professional-development/>], Accessed 7 April 2025.

¹² Harris, Jonathan F., *Credentialism at Work*, Georgetown Law Journal, Vol. 113, No. 6, June 2025, p. 1435.

tence and the concept of an education pursued throughout life as ‘a continuous process of forming whole human beings - their knowledge and aptitudes, as well as the critical faculty and the ability to act.’¹³

To remain relevant, lawyers are expected to adapt to a model of dynamic competence by cultivating ‘learning agility’, understood as the capacity to continuously acquire new skills, unlearn outdated ones and adapt effectively to evolving circumstances as a lifecycle professional responsibility.¹⁴

The distinction between static qualification (e.g. passing a bar exam) and dynamic competence is crucial. Although initial qualifications indicate skill at a certain time, the ‘half-life of knowledge’ guarantees that both fundamental and specialised information is always being surpassed or rendered inaccurate.¹⁵

3.3. Continuity in Competence Development as a Regulatory Necessity and Instrument

The evolving nature of law means that a one-off certification at the start of a career may not be sufficient to guarantee effectiveness throughout a lifetime. By comparison, the regulatory framework of the legal profession is shifting from a focus on initial admission to lifestyle regulation. This transition is also essential to lawyers’ public function, as it requires continuous development rather than a one-off demonstration of competence. Given that lawyers perform a public function in the administration of justice, professional competence must be treated as a condition of that function. In other words, legal education must extend beyond graduation. Practitioners who depend exclusively on their prior education risk becoming susceptible to errors and ineffective in an evolving landscape of changing laws and new technology.¹⁶ Therefore, regulatory frameworks must include a lifecycle strategy that mandates continuous learning to guarantee that attorneys remain socially responsible and competent at addressing challenging legal situations.¹⁷

¹³ Delors, J. *et al.*, *Learning: the treasure within: report to UNESCO of the International Commission on Education for the twenty-first century*, UNESCO Publishing, 1996, p. 21.

¹⁴ Singapore Academy of Law, *Lifelong Learning and Learning Agility: Essential Skills for Modern Lawyers*, 2025, Available at: [<https://sal.org.sg/articles/lifelong-learning-and-learning-agility-essential-skills-for-modern-lawyers/>], Accessed 7 April 2025.

¹⁵ Brink, S., *The Longevity Dividend*, Springer Charm, 2023, p. 65.

¹⁶ Hewitt, A., *Give Me a Fish or Teach Me to Fish?: Developing Law Students’ Capacity for Lifelong Learning*, in: *Alternative Law Journal*, Vol. 37, Issue 4, 2012, p. 259.

¹⁷ See: Dube, I.; Assumi, S Erika., *op. cit.* note 4, p. 193.

As a vital regulatory instrument, continuing legal education may serve as both a preventive (*ex ante*) and a disciplinary (*ex post*) mechanism. On the one hand, CLE serves a preventive function because it enables attorneys to remain up to date with the latest developments and thereby maintain their professionalism and effectively serve the justice system, while on the other hand, it has a disciplinary function, as failure to comply with mandatory requirements may lead to sanctions. However, to be effective, continuing legal education must move beyond formal participation requirements toward models that develop substantive competence to prepare lawyers for issues that may arise in practice.

Therefore, professional development is the responsibility of lawyers to the public, not merely a means of advancing their careers. It is about both serving clients effectively and upholding the integrity of the legal profession by committing to the highest standards of legal representation and the fair administration of justice.¹⁸

4. THE POSITION OF THE ATTORNEYS WITHIN THE EU LAW CONTEXT

4.1. Primary EU law: the anchor for competence

The importance of effective judicial protection and the rule of law is grounded in Article 2 and Article 19 of the Treaty on European Union (TEU)¹⁹, with Article 2 establishing the Union's foundational values²⁰ and Article 19 ensuring their practical enforcement through effective judicial remedies.²¹ In this context, Article 47 of the Charter of Fundamental Rights of the European Union guarantees the right to an effective remedy and to a fair trial.²² These provisions do not directly regulate the competencies of attorneys and their continuing legal education, but provide the essential framework linking the rule of law, effective judicial protection, and

¹⁸ Counsel Pulse, *op. cit.* note 12.

¹⁹ Consolidated version of the Treaty on European Union, *OJ C 202* 7 July 2016, p. 13.

²⁰ Article 2 TEU: 'The Union is founded on the values of respect for human dignity, freedom, democracy, equality, the rule of law and respect for human rights, including the rights of persons belonging to minorities. These values are common to the Member States in a society in which pluralism, non-discrimination, tolerance, justice, solidarity and equality between women and men prevail.'

²¹ Article 19(1) TEU: '[...]Member States shall provide remedies sufficient to ensure effective legal protection in the fields covered by Union law.'

²² Charter of Fundamental Rights of the European Union, *OJ C 202*, 7 July 2016, pp. 396–396; Article 47, Right to an effective remedy and to a fair trial: Everyone whose rights and freedoms guaranteed by the law of the Union are violated has the right to an effective remedy before a tribunal in compliance with the conditions laid down in this Article. Everyone is entitled to a fair and public hearing within a reasonable time by an independent and impartial tribunal previously established by law. Everyone shall have the possibility of being advised, defended and represented. Legal aid shall be made available to those who lack sufficient resources in so far as such aid is necessary to ensure effective access to justice.

the proper functioning of justice. In this framework, attorneys should be viewed not just as private service providers, but as key actors in ensuring effective judicial protection, making their professional competence a fundamental requirement rather than simply a market quality.

4.2. The (secondary) legal framework for the position of the attorneys

The most important, specific EU-law source in the context of the legal profession is Directive 2005/36/EC on the recognition of professional qualifications,²³ particularly Article 22, which requires Member States to encourage continuing professional development for professions covered by the system.²⁴ While the legal profession is, in many respects, regulated by its own sectoral rules rather than solely by this directive, Article 22 retains significant value, as it demonstrates that EU law no longer regards professional qualification as a one-off event but instead embraces a life-cycle understanding of professional competence. Therefore, in European regulatory thinking, professional competence is not exhausted upon initial admission but must be continuously maintained.

Directive 98/5/EC²⁵ allows lawyers to practice permanently in a Member State other than the one where they were originally qualified.²⁶ This directive is significant because it reflects the reality that lawyers increasingly work across borders, making it hard to defend a model in which the knowledge gained at admission is deemed permanently sufficient. It assumes a professional environment in which lawyers must stay capable of operating under different legal systems and evolving conditions. Case law from the Court of Justice of the European Union has reinforced this by interpreting the directive as granting European lawyers the right to engage in the same professional activities as host-state lawyers, within the directive's limits, thereby supporting the idea that competence cannot remain static.²⁷

²³ Council Directive 2005/36/EC on the recognition of professional qualifications [2005] OJ 255 (hereinafter: Directive 2005/36/EC).

²⁴ Directive 2005/36/EC, Article 22: 'With regard to the training referred to in Articles 24, 25, 28, 31, 34, 35, 38, 40, 44 and 46: (a) Member States may authorise part-time training under conditions laid down by the competent authorities; those authorities shall ensure that the overall duration, level and quality of such training is not lower than that of continuous full-time training; (b) in accordance with the procedures specific to each Member State, continuing education and training shall ensure that persons who have completed their studies are able to keep abreast of professional developments to the extent necessary to maintain safe and effective practice'.

²⁵ Directive 98/5/EC of the European Parliament and of the Council to facilitate practice of the profession of lawyer on a permanent basis in a Member State other than that in which the qualification was obtained [1998] OJ L 77 (hereinafter: Directive 98/5/EC).

²⁶ Directive 98/5/EC, Article 1.

²⁷ See: Case C-168/98 *Grand Duchy of Luxembourg v European Parliament and Council of the European Union* [2000] ECLI:EU:C:2000:598, paras. 20, 23-25; Case C-431/17 *Monachos Eirinaios kata kos-*

Alongside the establishment, Directive 77/249/EEC²⁸ should also be taken into account. This directive is the earlier instrument for the freedom to provide services for lawyers and has a slightly different significance than Directive 98/5/EC. While Directive 98/5/EC supports the argument for permanent cross-border professional integration, Directive 77/249/EEC underlines that lawyers' work is already situated within a European framework of temporary and cross-border service provision. The directive demonstrates that the profession is not confined to national boundaries. Viewed in this light, continuing legal education can be defended as a necessary condition for maintaining professional readiness in a mobile, European legal environment.

4.3. The public role of lawyers and the legitimacy of professional regulation through the lens of the CJEU case law

*Wouters v Algemene Raad van de Nederlandse Orde van Advocaten*²⁹ remains one of the most important judgments for conceptualising the legal profession as playing a special role in the administration of justice. The Court recognised that lawyers are not ordinary market actors and that certain restrictions connected to professional ethics and the proper practice of the profession may be justified.³⁰ This reasoning provides a strong basis for the argument that continuing legal education can legitimately be understood as a professional-regulatory instrument serving the public function of attorneys.

Further, the case *Reinhard Gebhard v Consiglio dell'Ordine degli Avvocati e Procuratori di Milano*³¹ provides the foundational framework for freedom of establishment in the context of the legal profession, providing that "... Member States must take account of the equivalence of diplomas and, if necessary, proceed to a comparison of the knowledge and qualifications required by their national rules and those of the person concerned."³² While the case does not specifically concern continuing legal education, it is indispensable for the argument that national measures af-

mon Antonios Giakoumakis tou Emmanouil v Dikigorikos Syllogos Athinon [2019], par. 36; Joined Cases C-58/13 and C-59/13 *Angelo Alberto Torresi* (C-58/13), *Pierfrancesco Torresi* (C-59/13) *v Consiglio dell'Ordine degli Avvocati di Macerata*, [2014], par. 52.

²⁸ Council Directive 77/249/EEC of 22 March 1977 to facilitate the effective exercise by lawyers of freedom to provide services [1977] OJ L 78 (hereinafter Directive 77/249/EEC).

²⁹ Case C-309/99 *Wouters v Algemene Raad van de Nederlandse Orde van Advocaten* [2002] ECLI:EU:C:2002:98.

³⁰ Case C-309/99, paras. 97-100.

³¹ Case C-55/94 *Reinhard Gebhard v Consiglio dell'Ordine degli Avvocati e Procuratori di Milano* [1995] ECLI:EU:C:1995:411.

³² Case C-55/94, para. 39.

fecting professional practice can be justified if they pursue legitimate objectives and are proportionate. Within this framework, CLE obligations - if appropriately designed - can be defended as measures that promote professional competence, protect clients, enhance the quality of justice and support the rule of law.

Also relevant are the cases *Graham J. Wilson v Conseil de l'ordre des avocats du barreau de Luxembourg*³³ and *Commission of the European Communities v Grand Duchy of Luxembourg*,³⁴ which, while more technical, deepens the discussion of lawyers' mobility. The former addresses access to the profession under Directive 98/5/EC and reinforces the importance of fair and objective professional-regulatory mechanisms.³⁵ The latter confirms that Member States may not introduce national barriers incompatible with the directive's harmonised framework.³⁶ Together, these cases support the argument that professional regulation is legitimate only when it is structured, lawful and justified.

4.4. The European Qualification Framework and EU lifelong-learning architecture: Competence as a Measure of Successful Completion of Education

Since the early 2000s, the EU has promoted qualifications frameworks — most notably the European Qualifications Framework (EQF) — as a means to help Member States adapt their education and training systems to the pressures of globalisation. Building on the Council Resolution of 27 June 2002 on lifelong learning³⁷ and developed within the Copenhagen process, the EQF was established by the Recommendation of the European Parliament and of the Council of 23 April 2008³⁸ and subsequently consolidated by the Council Recommendation of 22 May 2017.³⁹ It provides a common reference framework of eight learning-outcomes-based levels⁴⁰, designed to function as a translation device between na-

³³ Case C-506/04 *Graham J. Wilson v Conseil de l'ordre des avocats du barreau de Luxembourg* [2006] (hereinafter: Case C-506/04).

³⁴ Case C-193/05 *Commission of the European Communities v Grand Duchy of Luxembourg* [2006] (hereinafter: Case C-193/05).

³⁵ Case C-506/04, para. 88.

³⁶ Case C-193/05, paras. 58-61.

³⁷ Council Resolution of 27 June 2002 on lifelong learning [2002] OJ C 163, p. 1.

³⁸ Recommendation of the European Parliament and of the Council of 23 April 2008 on the establishment of the European Qualifications Framework for lifelong learning [2008] OJ C 111, p. 1.

³⁹ Council Recommendation of 22 May 2017 on the European Qualifications Framework for lifelong learning and repealing the Recommendation of the European Parliament and of the Council of 23 April 2008 [2017] OJ C 189, p. 15 (hereinafter: Council Recommendation [2017] OJ C 189).

⁴⁰ The lower levels (1–4) typically cover general education and lower-level vocational training. With regard to higher education, EQF Level 5 corresponds to the higher-education short cycle; Level 6 to the

tional qualifications systems and to improve the transparency, comparability and portability of citizens' qualifications across the Member States, in support of life-long learning and the modernisation of education and training systems.

The EQF is non-binding, and its purpose is neither to replace existing national legislation nor to create an obligation to adopt new national legislation.⁴¹ Still, at its core, is the stipulation of the 'learning outcomes' as statements regarding what a learner knows, understands and is able to do on completion of a learning process, which are defined in terms of knowledge, skills and responsibility and autonomy.⁴² The EQF's eight reference levels are described entirely through learning-outcome descriptors, not through inputs (such as years of study, type of institution, or curriculum content). This is what allows the EQF to function as a translation device: qualifications from very different national systems can be compared because they are all expressed in the same output-based terms. A key consequence of the learning-outcomes approach is that, in principle, the same outcomes can be achieved through formal, non-formal or informal learning, which is why the EQF is explicitly linked to the validation of non-formal and informal learning.⁴³ Thus, the 'outcome' becomes 'measure' for successful completion – the acquisition of competencies. Thus, the outcome provides a means of regulating through quality indicators.⁴⁴

The Council Resolution of 27 June 2002 on lifelong learning, the EQF Recommendation of 2017, and the 2022 Recommendation on micro-credentials⁴⁵ together construct a policy environment in which all regulated professions are expected to participate in continuous learning across the working life. The 2022 micro-credentials Recommendation is particularly relevant for legal practice: it explicitly envisages micro-credentials as a means of "upskilling and reskilling" workers, including for "mandatory requirements for upskilling and reskilling in certain

first cycle (typically a bachelor's); Level 7 to the second cycle (typically a master's); and Level 8 to the third cycle (typically a doctorate).

⁴¹ Sokol, T.; Staničić, F., *Europski pravni okvir u području obrazovanja: treba li nam uopće zakon o hrvatskom kvalifikacijskom okviru?*, Zbornik Pravnog fakulteta Sveučilišta u Rijeci, Vol. 42, No. 1, 2021, pp. 1-20.

⁴² Council Recommendation [2017] OJ C 189, p. 15, Annex I(e). The earlier formulation in the 2008 Recommendation defined learning outcomes in terms of "knowledge, skills and competence", Annex I(f) [2008] OJ C 111, p. 1.

⁴³ *Ibid.*, recital 4 and Annex I(j).

⁴⁴ Cort, P., *Stating the Obvious: The European Qualifications Framework is Not a neutral evidence-based policy tool*, European Educational Research Journal, Vol. 9, No. 3, 2010, pp. 304-316.

⁴⁵ Council Recommendation of 16 June 2022 on a European approach to micro-credentials for lifelong learning and employability [2022] OJ C 243, p. 10.

jobs and types of work (e.g. for licences, required training and permits)”⁴⁶. This captures the typical structure of CLE obligations and positions CLE programmes as well-suited for delivery as micro-credentials — quality-assured, referenced to the EQF, capable of accumulation, and portable across jurisdictions.

5. COMPARATIVE PERSPECTIVE: GERMANY AND CROATIA

Germany and Croatia illustrate contrasting approaches to continuing legal education. Germany does not impose a single, universal, highly formalised CLE system for all lawyers. Instead, it combines a strong conception of the lawyer’s public role and professional independence with a differentiated, partly decentralised approach to professional development. Croatia, in contrast, has adopted a more explicit statutory and rule-based model of mandatory continuing professional training, organised by the Bar and implemented through the Bar’s Academy and a dedicated rulebook. This contrast is analytically valuable because it allows a comparison between a principle-driven, competence-focused system (Germany) and a formalised, mandatory CLE model (Croatia).

5.1. Germany

The starting point in Germany is the Federal Lawyers’ Act (Bundesrechtsanwaltsordnung – BRAO),⁴⁷ which establishes the attorneys’ core professional identity. Section 1 BRAO declares that the attorney is an “independent organ of the administration of justice,” while Section 43 sets out the general professional duty: attorneys must practice their profession conscientiously and maintain the respect and trust required by their status, both within and outside professional life. These provisions are foundational because they frame competence as an essential part of the attorneys’ institutional role in the justice system and of conscientious professional conduct.

The law shows that continuing education is integrated into the attorneys’ role and ethical duties rather than imposed as a separate technical requirement. Professional associations (bar chambers), specialist committees, and courts guide and supervise the maintenance of competence through advisory rules, voluntary advanced qualifications, and recognised specialist titles.⁴⁸ Institutionalised seminars, peer

⁴⁶ *Ibid.*, paragraph 12(g).

⁴⁷ Bundesrechtsanwaltsordnung (BRAO), published in the Federal Law Gazette Part III, Classification Number 303-8, as last amended by Article 4 of the Act of 22 December 2025 (Federal Law Gazette 2025 I No. 349), Available at: [<https://www.gesetze-im-internet.de/brao/BJNR005650959.html>] Accessed 26 March 2026.

⁴⁸ BRAO, § 43c.

consultation, and jurisprudence updates serve as practical mechanisms to ensure that lawyers remain capable of performing their duties conscientiously.

This reveals an important feature of the German system: continuing competence is present, but not centralised. It appears across rules, §§43a–43f BRAO in particular, governing the core professional duties of attorneys, including independence, confidentiality, conflicts of interest, advertising, specialist qualifications, organisational aspects of practice and the obligation of continuous professional development, as well as in professional rules such as Professional Code for Lawyers (Berufsordnung für Rechtsanwälte – BORA),⁴⁹ which require demonstration of knowledge in designated practice areas and provide for a reasonable time for further training. This makes Germany an example of a system in which continuing education is embedded in the profession's normative frame and linked to the lawyer's role in the administration of justice.

The next key source in the German system is the Specialist Lawyers' Regulation (Fachanwaltsordnung – FAO),⁵⁰ which translates the general competence expectations of BRAO and BORA into a concrete, measurable continuing-education framework. Under §15 FAO, attorneys who hold a specialist title must complete a minimum hours of continuing education per specialist field.⁵¹ This model is significant because it quantifies the continuing-education duty, allows some flexibility in learning formats, enforces quality through controlled self-study and links the obligation directly to the lawyer's claim to specialist status.

This highlights that Germany's approach to CLE is not static. In 2024, the Statutory Assembly of the German Bar (Satzungsversammlung) explicitly called for the legislature to provide a clearer legal basis for a more concrete and enforceable continuing-education duty applicable to all lawyers.⁵² The notice from the Federal Bar of Germany (Bundesrechtsanwaltskammer – BRAK) emphasises that the

⁴⁹ Professional Code of Conduct for Lawyers Adopted by the General Assembly of the German Federal Bar Association. Last amended by resolution of the General Assembly of 26 May 2025, published on brak.de on 8 September 2025, effective 1 December 2025., Available at: [\[https://dejure.org/gesetze/BORA\]](https://dejure.org/gesetze/BORA), Accessed 26 March 2026.

⁵⁰ *Fachanwaltsordnung*, 1.10.2023, Available at: [\[https://www.anwaltakademie.de/fachanwaltslehrgaenge/fachanwaltsordnung\]](https://www.anwaltakademie.de/fachanwaltslehrgaenge/fachanwaltsordnung), Accessed 26 March 2026.

⁵¹ Attorneys who hold a specialist title must complete a minimum of fifteen hours of continuing education per specialist field, where up to five hours may be completed through self-study, provided there is a system of learning control and proof of compliance must be submitted to the relevant bar chamber proactively. If the required hours are not met, the chamber grants a period for completion.

⁵² *Resolution beschlossen – Satzungsversammlung dringt auf Konkretisierung*, 2024, Available at: [\[https://www.brak.de/newsroom/news/resolution-beschlossen-satzungsversammlung-dringt-erneut-auf-konkretisierung/?utm_source=chatgpt.com\]](https://www.brak.de/newsroom/news/resolution-beschlossen-satzungsversammlung-dringt-erneut-auf-konkretisierung/?utm_source=chatgpt.com), Accessed 15 April 2026.

profession itself seeks authority to define and operationalise the continuing legal education obligation (Fortbildungsverpflichtung) within the BRAO.

The German CLE framework can be understood as a multi-layered system. At its foundation, the BRAO establishes the attorney's professional identity and imposes a broad duty of conscientious practice. Building on this, the BORA distributes competence-related obligations across specific professional contexts, such as the lawful use of expertise titles, mediation and employment conditions. The FAO then introduces the most concrete and measurable continuing-education requirements, but these apply only to lawyers holding specialist titles. Finally, ongoing professional debates, including the 2024 discussions in the Satzungsversammlung, suggest that Germany may move toward a clearer, enforceable general CLE duty for all lawyers in the future.

This layered structure shows that Germany is not a country without CLE; instead, it regulates professional competence in a selective and contextual manner. Analytically, Germany ensures lawyer competence mainly through a mix of professional status, practice duties, specialist-title regulation and a robust self-regulatory professional culture.

5.2. Croatia

Croatia presents a model that has advanced in the legal operationalisation of continuing legal education. The Croatian Law on the Bar (*Zakon o odvjetništvu*)⁵³ provides the statutory foundation - Article 1 defines advocacy as an independent and autonomous service, ensuring legal assistance to natural and legal persons in the exercise and protection of their rights and legal interests. Article 2 reinforces this independence by organising the profession through the Croatian Bar Association as an autonomous and self-governing body. Article 7 imposes a duty on lawyers to provide legal assistance conscientiously and in accordance with the Constitution, laws, the Bar's statute, other general acts and the Code of Ethics. Critically for continuing education, Article 15a explicitly requires lawyers to pursue ongoing professional development and empowers the Bar to prescribe, by rules, both the programme and the method for implementing this professional development. Unlike systems that imply CLE through ethical or cultural norms, Croatian law directly enshrines the duty of continuous professional improvement, offering a clear operational and statutory framework for competence maintenance.

⁵³ *Zakon o odvjetništvu*, pročišćeni tekst zakona Official Gazette 09/94, 117/08, 50/09, 75/09, 18/11, 126/21, 98/25 na snazi od 12 July 2025, Available at: [<https://www.zakon.hr/z/176/zakon-o-odvjetnistvu>], Accessed 26 March 2026.

Croatia is particularly instructive because it illustrates a more developed statutory model of continuing legal education within a civil-law bar system. The Croatian Law on the Bar explicitly links the lawyer's public role, the duty to provide conscientious professional service and bar self-regulation to a clear obligation of continuous professional development. Unlike Germany, where formal CLE is concentrated on specialist lawyers, Croatia embeds continuing education directly in the statute for all members of the profession. This makes it a highly relevant benchmark for North Macedonia, showing how a legal system can mandate bar-managed continuing education while maintaining professional autonomy and self-governance.

The next key layer is the Statute of the Croatian Bar Association (*Statut Hrvatske odvjetnicke komore*),⁵⁴ which sets out the Bar's role in overseeing continuing professional development.⁵⁵ The statute assigns the Bar responsibility for supporting the ongoing training of lawyers and trainee lawyers, including through professional and scientific cooperation with courts, notaries, administrative bodies, law faculties and legal associations.⁵⁶ It specifies that the Bar's governing board and the Lawyers' Academy (*Odvjetnička akademija*) are tasked with delivering seminars, courses, lectures, round tables, publications, online materials and formal training programmes.⁵⁷ These activities may be organised in collaboration with courts, public bodies, faculties, the Judicial Academy, or foreign bar associations.⁵⁸ Importantly, the statute also establishes the Lawyers' Academy as a dedicated body within the Bar,⁵⁹ governed by its own rulebook, providing a concrete institutional mechanism to implement CLE rather than leaving it as a mere abstract duty.

The third and most operationally significant source is the Rulebook on the Continuing Professional Training of Lawyers of 2022 (*Pravilnik o trajnom stručnog usavršavanja odvjetnika*).⁶⁰ This rulebook gives Croatia's CLE system its concrete structure. Article 1 establishes that lawyers are obliged to participate in continuing professional training and clarifies that the rulebook governs how this obligation is fulfilled, its implementation, the associated rights and duties and the monitoring and record-keeping system, all aimed at systematically enhancing the quality of

⁵⁴ Statute of the Croatian Bar Association, Official Gazette 151/22; NN 82/2024, Available at: [<https://www.hok-cba.hr/propisi-i-akti/statut/>], Accessed 26 March 2026.

⁵⁵ Statute of the Croatian Bar Association, Article 4.

⁵⁶ Statute of the Croatian Bar Association, Article 21.

⁵⁷ Statute of the Croatian Bar Association, Articles 18, 21.

⁵⁸ Statute of the Croatian Bar Association, Article 21(2).

⁵⁹ See: Statute of the Croatian Bar Association, Section XI.

⁶⁰ *Pravilnik o trajnom stručnog usavršavanja odvjetnika*, 17 March 2022, Available at: [https://narodne-novine.nn.hr/clanci/sluzbeni/2022_04_51_650.html] Accessed 26 March 2026.

the profession in the interests of clients and the administration of justice. Article 2 defines continuing professional training as the upgrading and acquisition of knowledge through various forms of learning, both live and online, in accordance with the Bar Academy's programme. Article 3 links the purpose of such training to improving lawyers' knowledge, keeping up with legislative developments and developing both foundational and advanced knowledge acquired during prior formal education. These provisions demonstrate a robust conceptual framework: CLE in Croatia is not treated as a mere attendance requirement, but as a structured mechanism directly connected to professional competence, the quality of legal services and the effective functioning of justice.

The Croatian rulebook is also noteworthy for the principles it establishes. Article 4 requires that continuing professional training be guided by accessibility, educational quality and the lawyer's free choice of content within the Bar Academy's programme. Article 5 recognises a broad range of learning formats – lectures, seminars, courses, study visits, conferences, round tables and other activities – and allows both in-person and online participation. Article 6 integrates the learning management system, giving lawyers access to all e-courses on the Bar's platform. These design features are significant: Croatia enforces a mandatory CLE system that balances obligation and flexibility, enabling lawyers to shape their continuing education while maintaining professional standards.

The core quantitative requirements are set out in Articles 7, 8, 10 and 13 of the Rulebook. Lawyers are obliged to maintain the knowledge necessary for practising advocacy and must complete at least 12 school hours of training each year, either through the Bar Academy's LMS system or live educational activities. The monitoring period runs annually from 1 January to 31 December. Lawyers receive an annual certificate upon completing the required hours, which cannot be carried over to the next year. These provisions demonstrate that Croatia has adopted a clearly structured compliance model: a mandatory annual minimum, a defined programme and provider, formal certification and no carry-over. This system is considerably more formalised than Germany's general framework and, in some respects, more precise than what is publicly apparent in North Macedonia's legal architecture.

What makes the Croatian system particularly noteworthy is that it combines a formal minimum-hour requirement with built-in quality control and oversight mechanisms. Article 10 allows some e-courses to include a knowledge check or written test, while Article 11 obliges the Bar to maintain records of lawyers' continuing education and gives the Lawyers' Academy the role of supervising compliance. If a lawyer fails to meet the annual requirement, the Academy must notify

the disciplinary prosecution service of the Croatian Bar. Article 17 further enables the Academy to cooperate with the Ministry of Justice and Public Administration, courts, universities, institutes and other legal entities. This framework goes well beyond a simple points register: it incorporates annual monitoring, verification of completion, potential disciplinary consequences and structured cooperation with external institutions, making it a highly operationalised and enforceable CLE model.

That said, Croatia's model still leans toward a formal, participation-based system rather than a fully outcome-oriented competence model. The rulebook primarily tracks hours spent in approved educational activities, and the optional knowledge checks are not consistently centralised. Certificates confirm completion of the required annual hours, but they do not verify the achievement of specific competence levels or learning outcomes. In this respect, Croatia represents an intermediate approach: it is more structured, enforceable and operationalised than a minimal seminar-counting system, yet it stops short of a comprehensive, EQF-style framework that systematically links continuing education to demonstrable professional competence.

The Code of Ethics of the Croatian Bar (Kodeks odvjetničke etike)⁶¹ reinforces the idea that continuing professional development is part of the lawyer's ethical duty. The Code opens by stating that lawyers must observe principles and rules of conduct that preserve the dignity and reputation of the profession and fulfil their obligations conscientiously. It also provides that lawyers should "renew, expand and improve their legal and general education,"⁶² embedding professional competence directly in the ethical framework of practice.

A further layer of the Croatian system concerns the legal framework for specialisation. The Croatian Law on the Bar devotes an entire chapter to this issue, and Article 69 provides that a lawyer may request recognition of a speciality in a specific field of law, with the fields themselves determined by the Bar's statute and specialisation formally granted by a designated body. In addition, the Bar has issued a Rulebook on the Conditions and Procedure for the Recognition of Specialisations for Lawyers Registered in the Register of the Croatian Bar Association (Pravilnik o uvjetima i postupku za priznanje specijalnosti odvjetnicima upisanim u Imenik

⁶¹ Kodeks odvjetničke etike, "Narodne novine" br. 64/2007., 72/2008., 64/2018., 52/2021., 83/2021., 81/2022, Available at: [<https://www.hok-cba.hr/wp-content/uploads/2023/03/Kodeks-odvjetnicke-etike-1.pdf>], Accessed 26 March 2026 (hereinafter: Kodeks odvjetničke etike).

⁶² Kodeks odvjetničke etike, point 16.

odvjetnika Hrvatske odvjetničke komore).⁶³ Even on the basis of the statutory provisions alone, the significance is clear: Croatia, similarly to Germany, links part of its competence architecture to officially recognised specialist expertise.

Croatia can therefore be characterised as a system in which continuing legal education is clearly embedded in law and professional structures. The Croatian Bar has established a statutory, institutionally organised and annually monitored CLE framework, administered by the Bar and implemented through the Lawyers' Academy. The system requires a mandatory minimum of annual training hours, maintains formal records and certification, and links non-compliance to potential disciplinary consequences. This approach is formalised but still largely relies on participation and compliance with prescribed hours rather than on a fully outcomes-based competence framework.

6. THE CLE OF ATTORNEYS IN THE REPUBLIC OF NORTH MACEDONIA

The status of the Republic of North Macedonia as an EU candidate country frames continuing legal education within a broader accession and rule-of-law context. The Stabilisation and Association Agreement⁶⁴ provides the legal basis for cooperation with the EU and for the approximation of legislation. Consequently, it establishes the expectation that national legal and institutional structures will evolve in line with European standards.

The Commission's rule-of-law framework, together with the inclusion of enlargement countries such as the Republic of North Macedonia in the 2024 and 2025 Rule of Law Reports, highlights ongoing monitoring of the country's justice system and explicitly links enlargement efforts to sustainable rule-of-law progress. These reports situate lawyers' professional development within the wider agenda of judicial reform, institutional trustworthiness and the quality of justice. This reinforces the logic that the quality of justice institutions and the legal profession is treated as part of the rule-of-law preparedness for accession.⁶⁵ Accordingly, they provide the justification for treating attorneys' sustained professional competence as a require-

⁶³ Pravilnik o uvjetima i postupku za priznanje specijalnosti odvjetnicima upisanim u Imenik odvjetnika Hrvatske odvjetničke komore, Available at: [<https://www.hok-cba.hr/propisi-i-akti/pravilnici/>], Accessed 26 March 2026.

⁶⁴ Stabilisation and Association Agreement with North Macedonia, Available at: [<https://eur-lex.europa.eu/EN/legal-content/summary/stabilisation-and-association-agreement-with-north-macedonia.html>], Accessed 25 March 2026.

⁶⁵ Commission Staff Working Document, 2024 Rule of Law Report, Country Chapter on the rule of law situation in North Macedonia, Brussels, 24.7.2024 SWD(2024) 830 final (hereinafter: 2024 Rule of Law Report), pp. 1-3; Commission Staff Working Document, 2025 Rule of Law Report, Country

ment of public-law significance. Finally, the IPA III programming framework⁶⁶ underlines that justice professionals from beneficiary countries are encouraged to participate in cross-border training alongside EU peers, thereby demonstrating a direct policy connection between accession and professional competence.⁶⁷

Together, these instruments make clear that, while they do not prescribe the form of continuing legal education, they establish that the professional capacity of lawyers is a critical element of North Macedonia's integration into European justice structures and of its alignment with rule-of-law standards.

6.1. The function of the attorneys in the Macedonian context: CLEs legal foundations and institutional positions

The Constitution of the Republic of North Macedonia is clear – “The advocacy is an independent and autonomous public service that provides legal assistance and exercises public powers in accordance with the law.”⁶⁸

The single most important domestic source is the Law on the Bar (Закон за адвокатурата),⁶⁹ which defines the legal function of the profession, the structure of the Bar, entry requirements, disciplinary rules and the core duties of attorneys. The law explicitly frames advocacy as the provision of legal assistance to protect rights before courts, state authorities, local government bodies and other legal actors.⁷⁰ Of particular significance is the language regarding professional responsibility: when taking the oath, an attorney pledges to act conscientiously and to preserve “the reputation of advocacy as a public service”⁷¹ while the law requires that legal assistance be provided “conscientiously and professionally.”⁷² Crucially for continuing legal education, the law establishes that attorneys have a duty to maintain and improve their professional competence throughout their careers through

Chapter on the rule of law situation in North Macedonia, Strasbourg, 8.7.2025 SWD(2025) 930 final, (hereinafter: 2025 Rule of Law Report), pp. 3-6.

⁶⁶ Commission Implementing Decision of 10.12.2021 adopting the Instrument for Pre-Accession Assistance (IPA III) Programming Framework for the period 2021-2027, Brussels, 10.12.2021 C(2021) 8914 final (hereinafter: IPA III programming framework).

⁶⁷ IPA III programming framework, pp. 56-65.

⁶⁸ Article 53 of the Constitution of the Republic of North Macedonia, Official Gazette No. 52/1991; 1/1992; 1/1992; 31/1998; 31/1998; 91/2001; 91/2001; 84/2003; 84/2003; 107/2005; 107/2005; 3/2009; 3/2009; 13/2009; 49/2011; 49/2011; 6/2019; 6/2019.

⁶⁹ Law on the Bar, Official Gazette No. 199/2023 from 25.09.2023 (hereinafter: Macedonian Law on the Bar).

⁷⁰ Macedonian Law on the Bar, Article 1.

⁷¹ Macedonian Law on the Bar, Article 11.

⁷² Macedonian Law on the Bar, Article 30.

mandatory training, seminars, workshops and similar activities organised by the Bar Association's Education Centre.⁷³ In this respect, the legislation goes beyond a purely ethical or policy-based approach: CLE is not merely encouraged; it is a legal obligation that directly supports lawyers' professional and public functions.

The Macedonian case is interesting because the issue is not whether CLE exists in law, but whether the legal framework effectively ensures professional competence. The Law on the Bar states that maintaining competence, i.e., CLE, is a legal duty. However, it offers limited guidance on how to implement this, leaving much to the Bar's self-regulation. It is precisely at this point that a critical evaluation of the system can be made.

The Statute of the Bar Association of the Republic of North Macedonia (Закон на АКPCM)⁷⁴ demonstrates how the foundation provided by the Law on Bar is institutionalised through professional self-governance. It affirms that the Bar performs its functions independently within the framework of the Constitution, the Law on the Bar, ratified international treaties, the Statute itself, the Code of Ethics and other regulations.⁷⁵ Importantly, the Statute recognises advocacy as an independent public service,⁷⁶ reinforcing the "public function of attorneys" also within domestic law. The Statute also establishes the Bar's Education Centre and explicitly assigns it responsibility for both the initial training of candidate attorneys and the continuous education of practising lawyers.⁷⁷ Moreover, it empowers the relevant bar bodies to determine fees for initial and continuous training.⁷⁸ This institutional embedding makes clear that CLE is not incidental: it is a structural feature of the Bar's architecture, reflecting the profession's commitment to sustaining competence as part of its public mission. The Statute is also significant because it reveals the profession's underlying regulatory model, which is based not on professional self-regulation exercised through the Bar's own bodies and acts.

Further, the Code of Professional Ethics of the Bar⁷⁹ provides the ethical framework governing the conduct of the attorneys. The Code is formulated as a set of principles that attorneys are required to follow in their professional work, and it

⁷³ Macedonian Law on the Bar, Article 15.

⁷⁴ Statute of the Bar Association of the Republic of North Macedonia, Official Gazette 169/2011; 75/2011; 169/2011; 169/2011; 68/2012; 76/2013; 113/2016; 95/2019; 128/2019; 189/2020; 54/2023; 142/2023 (hereinafter: Statute of the Bar Association of the Republic of North Macedonia).

⁷⁵ Statute of the Bar Association of the Republic of North Macedonia, Article 2.

⁷⁶ Statute of the Bar Association of the Republic of North Macedonia, Article 2.

⁷⁷ Statute of the Bar Association of the Republic of North Macedonia, Article 8.

⁷⁸ Statute of the Bar Association of the Republic of North Macedonia, Article 23.

⁷⁹ *Code of Professional Ethics of Attorneys, Professional Associates and Trainee Lawyers of the Bar Association of the Republic of Macedonia*, Available at:

expressly provides that non-compliance by attorneys, professional associates and trainees constitutes a disciplinary breach subject to sanctions under the Bar's regulatory framework.⁸⁰ This gives the Code a dual significance. On the one hand, it establishes the ethical dimension of professional competence, presenting it as integral to the lawyer's professional identity rather than merely a matter of administrative compliance. On the other hand, by linking these principles to disciplinary responsibility, it ties ethical standards to enforceability. Taken together with the Law on the Bar and the Statute, the Code demonstrates that the Macedonian framework already recognises competence as a legal, institutional and ethical obligation. The central issue, therefore, is the extent to which those standards are translated into a coherent, outcome-oriented system of continuing legal education. Closely connected to this framework is the Rulebook on Disciplinary Responsibility (Правилник за дисциплинска одговорност)⁸¹, which gives practical effect to the enforcement of professional standards.

Another aspect that merits particular attention is the regulation of admission and entry into the profession under the Law on the Bar and the Statute. Both sources make clear that candidates seeking enrolment must provide proof of completed initial training at the Education Centre of the Bar Association, with the Statute expressly requiring such training as a condition for entry.⁸² This demonstrates that the Macedonian system already adopts a training-based approach to professional access, going beyond a model based solely on academic qualification, the judicial exam and formal registration.⁸³ In effect, it reflects an understanding that these elements alone are insufficient to ensure professional readiness. Once this premise is accepted at the point of admission, it supports the further conclusion that the same logic should apply throughout the professional career, requiring the continuous maintenance and development of competence through continuing legal education.

There is also practical evidence that the Bar's CLE system is active, not merely formal. The Bar's training archive shows repeated announcements for "continuing le-

[<https://www.mba.org.mk/index.php/mk/akti/kodeks-etika>] Accessed 26 March 2026 (hereinafter: Code of Professional Ethics of Attorneys, Professional Associates and Trainee Lawyers of the Bar Association of the Republic of Macedonia).

⁸⁰ Code of Professional Ethics of Attorneys, Professional Associates and Trainee Lawyers of the Bar Association of the Republic of Macedonia, Preamble.

⁸¹ *Rulebook on Disciplinary Responsibility*, Available at: [<https://www.mba.org.mk/index.php/mk/akti/2018-09-18-13-27-36>], Accessed 26 March 2026.

⁸² Macedonian Law on the Bar, Articles 12 and 34; Statute of the Bar Association of the Republic of North Macedonia, Articles 33 and 66.

⁸³ However, at present, the training consists of a one-week internship during which trainees carry out routine tasks at the Bar Association.

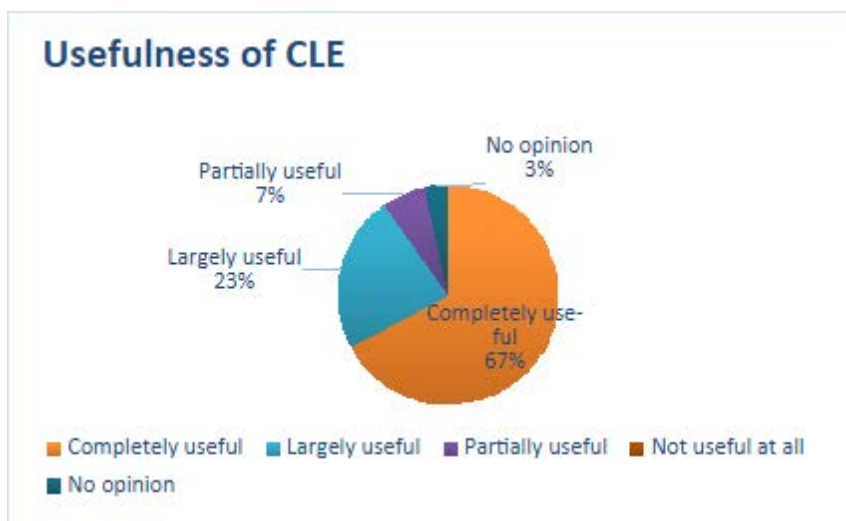
gal education” activities.⁸⁴, often run in cooperation with external partners. While these materials are not primary legal sources, they serve as a strong institutional indicator that the Bar is actively implementing its statutory mandate through organised training programmes.

6.2. CLE of Attorneys: positions and experiences

Overall, the survey revealed that attorneys find continuing legal education useful for their legal and professional development; however, existing opportunities are not used as frequently as one might expect.

There is no doubt that attorneys find that continuous professional development and lifelong learning in the legal profession (CLE) very useful for their profession, with 67% finding it completely useful and 23% largely useful (see Graph 1).

Graph 1. Results on question: In your opinion, how useful is continuous professional development and lifelong learning in the legal profession (CPD) for your profession?



Source: Authors

⁸⁴ *Bar Association training archive*, Available at: [\[https://www.mba.org.mk/index.php/mk/obukii\]](https://www.mba.org.mk/index.php/mk/obukii) Accessed 26 March 2026; *Training in cooperation with the U.S. National Center for State Courts: 'Ethical Dilemmas for Defense Lawyers in North Macedonia'*, Available at: [\[https://www.mba.org.mk/index.php/mk/obukii/item/1011-obuka-vo-sorabotka-so-nacionalniot-centar-za-drzhavni-sudovi-na-sad-etichki-dilemi-za-advokatite-braniteli-vo-severna-makedonija\]](https://www.mba.org.mk/index.php/mk/obukii/item/1011-obuka-vo-sorabotka-so-nacionalniot-centar-za-drzhavni-sudovi-na-sad-etichki-dilemi-za-advokatite-braniteli-vo-severna-makedonija) Accessed 26 March 2026; *Archive notices*, [\[https://www.mba.org.mk/index.php/mk/obukii/arhiva\]](https://www.mba.org.mk/index.php/mk/obukii/arhiva), Accessed 26 March 2026.

However, it should be noted that respondents do not appear to have a clear understanding of whether participation in the CLE is mandatory or voluntary for their professions. Specifically, just over half of respondents (57%) identify the CLE as a voluntary activity, while 28% believe it is mandatory and 15% are unsure. This makes it difficult to assess the quantity of training activities they participate in, as they report on the frequency of participation in both mandatory and voluntary training activities. In our view, these responses show that although attorneys find CLE activities very useful, participation in them is low: on average, approximately one quarter of respondents did not participate in any training activity in the past 3 years, and equally, only one quarter have attended CLE activities (see Table 1 and Table 2).

Table 1. Participation in CLE if it is voluntary

If it is not mandatory, how often have you participated in CLE activities in the last three years?		
	No.	%
Not once	11	18%
Once a year, but not every year	12	20%
Once a year	2	3%
Twice a year	15	25%
More than twice a year	16	26%
No response	5	8%

Source: Authors

Table 2. Participation in CLE if it is mandatory

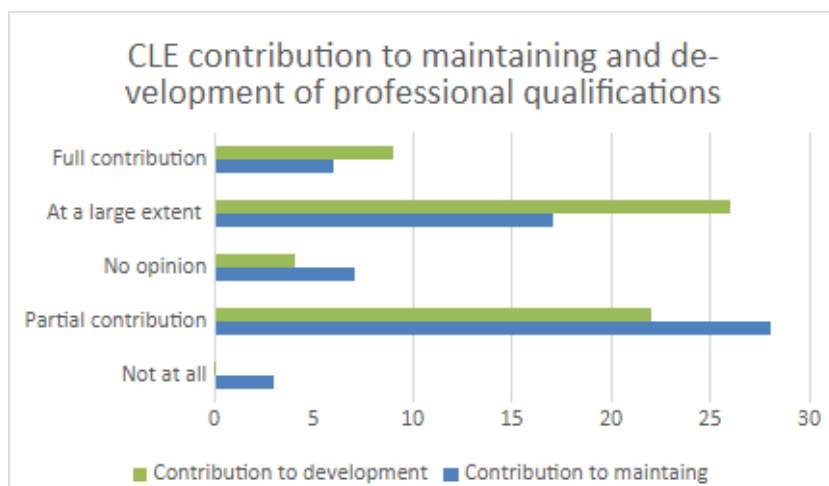
If it is mandatory, to what extent have you participated in CLE activities in the last year?		
	No.	%
Not once	19	31%
Less than the minimum required	4	7%
Exactly the minimum required	14	23%
More than the minimum required	15	25%
No response	0	0%

Source: Authors

The main reason for participating in CLE, cited by 77% of respondents, is the development of knowledge, followed by the need for professional development (66%) and skills development (64%), with most respondents selecting all of these reasons. Interestingly, 7 respondents (11%) stated that they participate in CLE due to legal obligations, presumably indicating their understanding of the legal framework that necessitates their continuous professional development, as described above. On the other hand, non-participation is justified by lack of time (48% of respondents) and financial reasons (31%), with lack of motivation cited by 15% (personal motivation 5% and professional motivation 10%). The majority of respondents find the topics covered by the offered CLE activities relevant to their work: 21% find them always relevant and 41% find them sometimes relevant. One quarter of respondents have no opinion on the relevance of the topics, while 13% find them rarely relevant.

The CLE is recognised as a contributing factor to the development of attorneys' professional qualifications, including knowledge, skills and competence. Almost half of the respondents (46%) believe that the CLE only partly contributed to maintaining their qualifications, while a total of 38% feel it contributed more significantly—28% to a large extent and 10% fully. This perception increases notably when considering the potential of the CLE. Nearly 60% of respondents see the CLE as having high potential to influence the future development of their qualifications—43% to a large extent and 15% believing it can fully contribute.

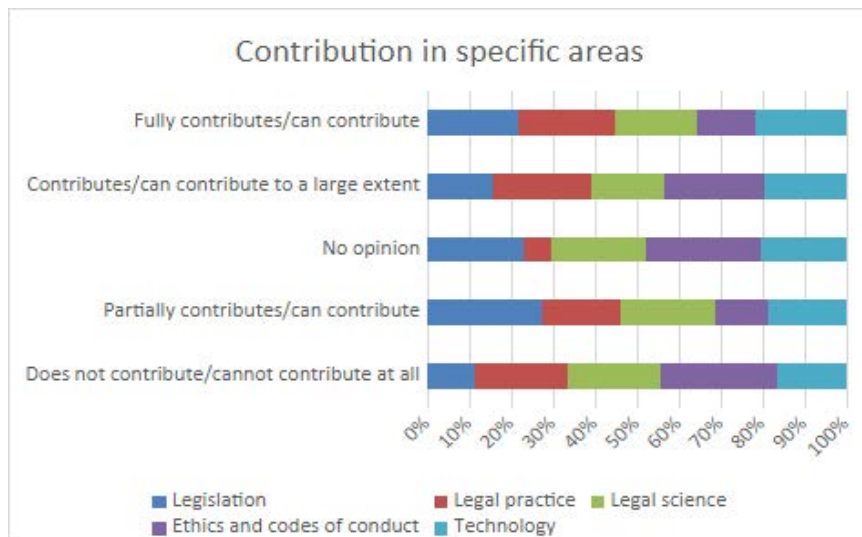
Graph 2. Responses to Question 1: To what extent does participation in CLE contribute to maintaining your professional qualifications (knowledge, skills, competencies)? and Question 2: To what extent can participation in CLE contribute to the development of your professional qualifications (knowledge, skills, competencies)?



Source: Authors

Since it was particularly important to identify where this contribution is and may be most relevant—considering changes in the legal environment and society at large—the respondents were asked to evaluate the relevance of CLE in five areas: legislative developments, legal practice, legal science, ethics and codes of conduct and technology. Based on the results shown in graph 3, we believe that legal practice—assuming the practical aspects of implementing and enforcing laws—is of the highest significance for respondents, with 77% indicating that CLE significantly contributes or could significantly contribute to their knowledge and understanding in this area. This is followed by technology (64%) and ethics and codes of conduct (62%), while 59% of respondents consider ongoing education on new legislative developments and legal science important.

Graph 3. Response to Question: To what extent does participation in continuing legal education (CLE) contribute/can contribute to the development of your professional qualifications in line with developments in the following areas?



Source: Authors

The survey indicates that, in principle, the training activities for attorneys have specified learning outcomes: 14 respondents (23%) reported that the outcomes were fully defined, while 30 respondents (49%) reported that they were partially defined. For a total of 7 respondents (12%), the learning outcomes were not defined, and 10 respondents (16%) did not have a position.

These results should also be considered in light of the fact that 62% of respondents believe the CLE only partially meets the current needs of the legal, social, and business systems; 26% feel it fully meets these needs; and 12% believe it does not meet these needs at all. This underscores the necessity of developing customised CLE activities that address current issues within the legal and socio-economic infrastructure.

Last but not least, 59% of respondents believe that the CLE should be mandatory. Among them, 26% support frequent training activities, while 33% prefer occasional activities. Conversely, 41% of respondents think participation should be voluntary.

7. DISCUSSION

Germany and Croatia illustrate two distinct approaches to regulating professional competence. In Germany, the starting point is the lawyer's status as an independent

organ of the administration of justice and the general duty to practise conscientiously. This is supplemented by distributed competence obligations and a strong formal CLE regime, but only for specialist titles. In contrast, Croatia begins with the lawyer's status as an independent and autonomous provider of legal services and explicitly legislates a duty of continuing professional development, supported by a dedicated institutional and procedural framework through the Bar and the Lawyers' Academy. Germany thus exemplifies a differentiated, principle-driven competence model, while Croatia exemplifies a formal, mandatory CLE system with clear institutional implementation. This distinction is particularly valuable for analysing North Macedonia. Germany demonstrates that professional competence can be secured without a universal attendance-based requirement, provided the system contains credible mechanisms for ensuring expertise. Croatia shows how a bar-managed system can codify annual training obligations, operate a central academy, issue certificates, maintain records, and link non-compliance to disciplinary consequences.

The Republic of North Macedonia can therefore be assessed against both models: Germany for the conceptual embedding of competence in the attorney's public role and Croatia for the operational design of a mandatory CLE framework.

Taken together, the legal framework regulating the profession of attorney in the Republic of North Macedonia — the Law on the Bar, the Statute, the Code of Professional Ethics and the disciplinary framework — constitutes a coherent structure in which statutory obligations, ethical principles and disciplinary mechanisms operate in conjunction. Within this structure, continuing legal education does not appear as an isolated training requirement, but as part of a broader system of professional accountability. The Macedonian model is, in a sense, both front-loaded and continuous, though not equally developed in both respects. Entry into the profession is relatively clearly organised, combining formal conditions, the bar examination and mandatory initial training. The law also explicitly requires ongoing professional education after admission. What is less clearly defined, however, are the standards governing that continuous education — its quality, scope, depth and the manner of its assessment. This makes it possible to move beyond the simple claim that North Macedonia lacks CLE. The issue is not the absence of such a system, but the risk of a gap between the existence of a formal obligation and the presence of a framework that genuinely ensures the maintenance of professional competence over time.

Although not part of the legal set-up of the legal profession in a strict sense, the Law on Higher Education⁸⁵ is highly relevant as an external structural source, since

⁸⁵ Law on Higher Education, Official Gazette 82/2018; 154/2019; 178/2021; 58/2024; 124/2025 (hereinafter: Macedonian Law on Higher Education).

it provides the legal basis for universities and law faculties to participate in lifelong and continuing education.⁸⁶ The law defines lifelong learning as a continuous process aimed at improving, supplementing, deepening and updating knowledge and treats it as both a guiding principle and an objective of higher education.⁸⁷ It also explicitly allows universities to establish centres for research and continuing education and to organise programmes of professional development and non-formal learning, including courses, seasonal schools and workshops, with the possibility of issuing certificates.⁸⁸ This source is further significant because it anchors the idea of law faculties contributing to CLE in an existing legal framework rather than presenting it as a mere policy proposal. The Law on Higher Education already enables universities to organise programmes of continuing and non-formal learning, issue certificates and run centres for professional development. This means that stronger cooperation between the Bar and the law faculties is not merely aspirational — it builds on the faculties' established legal capacity to provide lifelong learning. The gap, therefore, lies not in any legal impossibility, but in the absence of integration between the Bar's CLE mandate and the existing structures of the higher-education system — an integration that would ensure professional competence is systematically maintained throughout an attorney's career.

Another key source that supports moving the discussion toward a competence-based approach is the Law on the National Qualifications Framework.⁸⁹ This law explicitly links the national framework to the European Qualifications Framework, defines knowledge, skills and understanding and treats lifelong learning as a combination of formal, non-formal and experiential learning aimed at improving competences throughout life.⁹⁰ It also introduces a clear quality-assurance dimension: the framework must operate according to measurable goals, standards and guidelines, and qualifications are subject to periodic evaluation, review every five years, revision and adjustment.⁹¹ The law additionally refers to certificates and micro-credentials.⁹²

Taken together, these provisions provide a strong domestic basis for critiquing a CLE system focused solely on attendance, demonstrating that Macedonian law

⁸⁶ Macedonian Law on Higher Education, Articles 3, 4, 85, 141.

⁸⁷ Macedonian Law on Higher Education, Articles 2-4.

⁸⁸ Macedonian Law on Higher Education, Articles 85, 141.

⁸⁹ Law on the National Qualifications Framework, Official Gazette No. 3/2025 from 03.01.2025 (hereinafter: Law on the National Qualifications Framework).

⁹⁰ Law on the National Qualifications Framework, Articles 1, 2.

⁹¹ Law on the National Qualifications Framework, Article 22.

⁹² Law on the National Qualifications Framework, Articles 2, 9, 12, 13, 16, 21.

outside the Bar already embraces a qualification-, outcome- and quality-oriented model of professional development.

This creates an interesting contrast within the domestic system. On the one hand, the Law on the Bar requires mandatory continuing education through the Bar's Education Centre. On the other hand, the national qualifications framework brings a much richer vocabulary: standards, quality assurance, periodic review, lifelong learning, micro-credentials, measurable objectives and alignment with the EQF. Together, these developments support a compelling domestic argument: the law governing the attorneys' profession in North Macedonia does not operate in a normative vacuum; it coexists with a national qualifications regime that makes it increasingly difficult to justify CLE solely as attendance at seminars, without a stronger competence-based rationale.

Overall, the findings indicate a system that is normatively recognised as important but remains functionally underutilised. While continuing legal education is perceived as essential for maintaining and developing professional competence, participation levels remain inconsistent and relatively low. This gap between perceived value and actual engagement points to structural limitations, including issues of accessibility, cost, time constraints and a lack of clarity regarding the regulatory framework.

At the same time, the survey results reveal significant potential. Respondents clearly recognise the capacity of CLE to contribute more meaningfully to their professional development, particularly in practice-oriented areas. The perception that CLE only partially meets the needs of the broader legal and socio-economic environment further highlights a misalignment between existing training provision and real-world demands. These findings support the case for a shift towards a more structured, competence-based approach, combining clearer regulatory expectations with flexible and targeted learning opportunities, in order to enhance both participation and the substantive impact of continuing legal education.

To conclude, the comparative analysis, the domestic legal framework and the empirical findings together point to a system in the Republic of North Macedonia that is formally established but substantively incomplete: continuing legal education exists as an implicit legal obligation, yet lacks the systemic design needed to function as an effective mechanism for ensuring professional competence over time. Addressing this gap requires a move towards a structured, competence-based framework. Such a framework should include clearly defined learning outcomes aligned with professional roles, differentiated and specialised training pathways, and measurable standards and quality-assurance mechanisms, including periodic

programme evaluation. It should also ensure greater accessibility through flexible formats, address structural barriers, and strengthen institutional coordination between the Bar, the law faculties and other relevant actors. Taken together, these measures could transform continuing legal education into a coherent instrument of competence assurance, thereby strengthening the position of attorneys as holders of a public function and reinforcing their role in safeguarding the rule of law.

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