

A Legal Analysis of the Role of Bar Associations towards Access to Justice for the Poor: A Case Study of Cameroon

Akama Samuel Penda¹, Ngatchou Toto Carles²

¹Senior Lecturer, ²Assistant Lecturer,

^{1,2}Department of English Law, Faculty of Laws and Political Science, University of Maroua, Cameroon

ABSTRACT

On the basis of unequal access to justice in Cameroon characterized by an imbalance between the rich and poor, it is the aim of this paper to suggest that the main principles of the rule of law should be improved for the poor, in order to ensure equity in every society. Considering that legal representation constitutes the core of access to justice, the present paper attempts to critically analyse the contribution of the Cameroon Bar Association towards access to justice for the poor, focusing on Cameroon, with the objective of promoting good governance and reducing poverty. The challenges that emerged from this study are to enable lawyers to reconcile their professional interests and those of their clients, to replace the business aspect of the legal profession with the traditionally altruistic role of lawyers, and by so doing, provide equal justice to the poor. The paper concludes that in Cameroon, as in other places, the Bar helps more than it hinders access to justice. In order to strengthen the role of the Bar in promoting access to justice, the establishment of CARPA is recommended here, whose additional advantage, apart from that of promoting good handling of clients' money, is promoting good governance within the bar, may be to provide through bank interest, funds to finance legal aid.

KEYWORDS: Access, Justice, Poor, Bar, Lawyers

1. INTRODUCTION

These days the concept of 'justice for all' is one of the most fundamental and widely articulated principles of our modern societies. As political claims for Human Rights, Democracy, Equality, and Justice are made, researchers and scholars believe it is necessary to investigate these notions¹. By so doing, much has been said and written on access to justice. In so much as it returns to this well-trodden ground, some justification for this paper is therefore required. Early writers on access to justice for the poor focused on the role of institutions such as the judiciary rather than Bar associations, although it is generally agreed that the basis of access to justice is legal representation and counsel which lawyers are committed to ensure. The contribution of Bar associations is of significant importance with regard to access to justice, so we thought it wise to contribute to filling this gap, while at the same time attempting in general to contribute to knowledge on access to justice as an important factor to good governance and poverty reduction.

This paper insist on the fact that access to justice is a necessity and not a luxury for our society: 'access to justice is

¹B. R Njupouen, Access to Justice for the Poor What Role For Bar Associations? The Case of Cameroon, Master of Science In Governance And Development Management, University Of Birmingham, 2005.

How to cite this paper: Akama Samuel Penda | Ngatchou Toto Carles "A Legal Analysis of the Role of Bar Associations towards Access to Justice for the Poor: A Case Study of Cameroon" Published in International Journal of Trend in Scientific Research and Development (ijtsrd), ISSN: 2456-6470, Volume-4 | Issue-1, December 2019, pp.1109-1118, URL: www.ijtsrd.com/papers/ijtsrd29794.pdf



Copyright © 2019 by author(s) and International Journal of Trend in Scientific Research and Development Journal. This is an Open Access article distributed under the terms of the Creative Commons Attribution License (CC BY 4.0) (<http://creativecommons.org/licenses/by/4.0>)



a fundamental right of every person'². On the basis that there is unequal access to justice among people in many societies characterised by an imbalance between the poor and rich, and to ensure equality in every society, one of the most prominent principles of the rule of law and democracy, access to justice should be improved for the poor³. In concrete terms, development of access to justice for the poor is likely to help poverty reduction⁴. Particularly, the present paper suggests a contribution to the achievement of the Millennium Development Goals (MDGs) in Cameroon, and more generally in other developing countries, in improving access to justice –rule of law not necessarily being a specific goal in itself, but part of the global environment that has to

²Statement by participants from 20 different commonwealth countries in the Caribbean and South Pacific regions and from a wide range of legal and non-legal professionals in Kingston, at the conclusion of a workshop organised by the Commonwealth Secretariat.

³Available at: <https://iproject.com.ng/sociology/poverty-and-access-to-justice/index.html>. Accessed on 12 October 2019

⁴DFID, Justice and Poverty Reduction. London: DFID issues, 2000. And UNDP, Access to Justice – Democratic Governance,' Access to Justice Practice Note' -December 2004, accessed on the internet on 20 06 2018 at <http://www.undp.org/governance/justice.htm>.

be addressed in view of achieving the 8 MDGs⁵. It is also the aim of this paper to show that legal institutions have a valuable role to play in that aim. Among those institutions are Bar Associations or, in other words, lawyers.

After considering Bar Associations in developed countries, this paper draws lessons for the Cameroon Bar, such as that ethics in the legal profession is a condition to good governance at the bar. In practical terms, our goal is to highlight issues, provoke discussion and thus approach possible solutions, rather than evaluate the profession or reach 'pat' solutions⁶. This is in view of the greater concern for poverty reduction and good governance, and restoration of the classical notion of lawyer that has more to do with altruism and dignity⁷ than business. However, this article subsequently suggests that the Bar Association is an independent expert body that is likely to efficiently promote access to justice and can be trusted by the state and international agencies, as well as being given greater means to carrying out access to justice related projects. Additionally it should be considered that lawyers have professional interests and that few are found in certain developing countries⁸. It is suggested that paralegals help in providing basic legal guidance before lawyers are approached in filing cases to Courts⁹.

2. Understanding the meaning of access to justice

Access to justice means different things to different people. In its narrowest sense, it represents only the formal ability to appear in court. Broadly speaking, it engages the wider social context of our court system, and the systematic barriers faced by different members of the community. Unfortunately, research papers and discussions often do not clearly set out what view of "access to justice" they are taking. This not only makes it challenging to understand the goals being sought, but it also makes it difficult to translate these goals into practical plans and programmes¹⁰. The following paragraphs describe various approaches to access to justice from narrow to broad.

⁵ D. Zelmira and N. Bolivar, 'The Wider Institutional Context' in Reaching the Millenium Development goals in Paraguay: How is the government of Paraguay facing up the challenge?(Abente et al).Report of Study visit to Paraguay of the Memmbers of the masters Programme in Governance and Development Management.Birmingham: University of Birmingham, 2005.

⁶ G. P. Richard, Positive Approaches to 21st Century Access to Justice, 1999. Accessed on the 20 July 2018 at www.wsba.org/media/publications/barnews/archives.

⁷ A. Richard L, The Legal Profession in England and Wales. Oxford: Basil Blackwell 1998 and D. Pannick, Advocates,Oxford: Oxford University Press, 1992.

⁸ M. Anderson, Access to Justice and Legal Process: Making Legal Institutions Responsive to Poor People in LDCs, comment paper on access to justice and legal process, 2003. Paper for discussion at WDR Meeting, 16-17 August 1999.Accessed on 25 July 2018 at www.penalreform.org-download/commentonthediagramsofproblems.

⁹Available at : <https://www.ibanet.org/Document/Default.aspx%3FDocumentUid%3D8F020FA1-D13A-4429-BF51-F9C08672D255> . Accessed on 12 October 2019

¹⁰ Available at: <http://www.aclrc.com/what-is-access-to-justice>. Accessed on 12 October 2019.

A. The right to appear in court

The narrowest conception of "access to justice" has its origins in liberal 18th and 19th century states, and refers to an individual's formal right to litigate or defend¹¹. It encompasses the right to "have your day in court"¹². While access to justice was considered a "natural right", governments did not feel a positive obligation to protect this right through affirmative action programmes¹³.

B. Advocacy for those who cannot afford it

Starting in the 1960s, definitions of access to justice focussed on "practising law for poor people". The goal was to provide legal representation to impoverished individuals who could not otherwise afford legal advice. It aimed to counteract the cost, delay and complexity of the legal system¹⁴. This concept of access to justice forms the foundation for today's legal aid and poverty law clinics.

In more recent times, the legal aid movement has been expanded to include access to legal advice for the middle-class. This is the current position of the Canadian Bar Association's National Access to justice committee, which frames access to justice as "the ability of low and middle class families to get the legal help or information they need"¹⁵. While the CBA acknowledges the existence of some vectors of marginalization such as disability and aboriginality, they are only considered as additional factors which can complicate matters if they happen to coincide with a low or middle-income situation¹⁶.

C. Reforming the justice system

A slightly broader definition of access to justice encompasses the need to advocate for people who cannot afford lawyers, but also focusses on the inadequacies and limitations of the legal aid system. This approach builds on the "legal aid" model by calling for reforms of the justice system by simplifying procedural and formal requirements and implementing mechanisms for group and third-party claims¹⁷. Generally, reforms in this conception of access to justice focus on the civil justice process.

D. Equality of outcomes

With the advent of the Canadian Charter of rights and freedoms in 1985, the idea of equality resulted in a shift towards a broader conception of access to justice¹⁸. This approach looks beyond equality of opportunity for

¹¹ Available at: <https://quizlet.com/403949678/rule-of-law-flash-cards/>. Accessed on 12 October 2019.

¹² M. Cappelletti and B. Garth, eds, Access to justice Volume 1: A World Survey, Book 1 (Aphenaandenriijn: Sijthoff and Noordhoff, 1978) [Cappelletti and Garth] at 6-7.

¹³ Ibid.

¹⁴ Ibid.

¹⁵ M. Dempster, "Justice for all", Canadian Bar Association National: Legal insights and practice trends 22:2, March 2013, available online at CBA National Magazine, <http://nationalmagazine.ca/>, accessed on 20/06/2018

¹⁶Available at: <http://www.aclrc.com/what-is-access-to-justice>, Accessed on 8 October 2019

¹⁷ R. A. Macdonald, "access to justice in Canada today" in Julia Bass, WA Bogart and F. H. Zemans, eds, Access to justice for a new century: the way forward, Toronto: Law Society of Upper Canada. 2005, [Macdonald] at 19.

¹⁸ Ibid.

underprivileged or underrepresented litigants. Instead, it aims to achieve equality of outcomes by addressing the barriers faced by those trying to access the judicial system¹⁹. Remedies include reforming and streamlining many areas of the legal system, as well as reforming other social institutions with the goal of creating a more holistic model of service.

This broader approaches argues that true access to justice must be considered in light of social variables which have historically has a negative impact on the ability of certain individuals or groups' ability to access justice²⁰. Such variables include Aboriginality, racialization, gender, disability, class and sexual identity²¹. There is also an increased focus on providing resources towards serving the public at the early stages of a problem²².

This approach encompasses elements from other approaches, including the use of simplified court procedures, alternative dispute resolution and other preventative measures in an effort to solve legal problems before they get to a litigation stage²³. These views have also been echoed very recently in four working group reports of the Action Committee on Access to Justice in Civil and Family matters published in 2012-2013²⁴.

E. The Future of Access to Justice

Where is the concept of "access to justice" headed next? Critics of current access to justice initiatives have called for societal change beyond the legal realm, by encouraging the justice system to develop partnerships with communities and governments to develop more holistic solutions to legal problems²⁵.

Some commentary points to the need to move away from court-centric and lawyer-centric approaches which focuses on solving the problems of community members in their daily lives²⁶. This requires access to justice research to shift its focus away from asking how lawyers can provide more services to the public, towards reaching a better understanding of what the law means and does not mean in the context of problems in everyday peoples live²⁷.

Other critics argue that individuals should be allowed to have a say in what kind of justice they wish to have (e.g. restorative justice)²⁸ and that the high cost of attending law

¹⁹ Ibid.

²⁰ Ab Currie, "The legal Problems of Everyday Life: The nature, extent and consequences of justiciable problems experienced by Canadians", Ottawa: Department of justice Canada, 2007.

²¹ Available at: <http://www.aclrc.com/what-is-access-to-justice>, Accessed on 08 October 2019.

²² Currie, Supra

²³ Dempster, Supra).

²⁴ Alberta Civil Liberties Research Centre, What is access to justice, available at www.aclrc.com, accessed on 18 June 2018.

²⁵ Macdonald, Supra

²⁶ Ibid

²⁷ B. G. Garth, Comment: a revival of access to justice research ? in Rebecca Sanderfur, ed, Sociology of crime law and deviance, volume 12, Bradford, GBR: Emerald Group Publishing Ltd, 2009. Pg 258.

²⁸ Ab Currie, Ibid.

school has the effect of forcing young lawyers to avoid opportunities to advocate for marginalized peoples because of pressures to find high-paying jobs to pay down their education debt²⁹.

2.1. Barriers blocking access to justice for the poor

We have developed four key barriers blocking access to justice,

2.1.1. Funding for Legal Aid Services

This will be examined below when we shall be discussing on the Cameroonian legal aid system.

2.1.2. High Cost for legal action

Though the court system is often the only way to resolve personal conflicts and obtain justice in civil circumstances, the court fees and costs of representation that come with legal action add up. For too many citizens, that cost is prohibitive and justice sits on the backburner. Legal aid is available for the poorest citizens, but is often lacking for those who exceed the poverty line yet don't have the budget to accommodate these costs³⁰.

We feel like the court fees are structured such that working class people are discouraged from solving disputes via the legal system. We help people with no money, and people with a tiny amount of money, but we don't have help for people who make more but live pay check to pay check.

Despite this sad reality, the poorest people are often defendants and not plaintiffs, so generally no fees are involved. But lower income people should be able to assert their rights by bringing cases proactively, as well; they shouldn't be limited.

2.1.3. Lack of automatic right to counsel in Common legal circumstances

Anyone familiar with the name "Dick Wolf, Producer" should know their Miranda rights by heart, and those include a right to counsel. But the civil system doesn't work the same way. A surprising number of common matters, including housing, custody, and debts proceedings, guarantee no legal counsel at all³¹.

It's a problem because the average citizen likely can't advocate for their case as effectively as possible without the expertise of a legal professional to back them up. There is a shocking data for this subject: from a study I carried out here in Maroua, Only 1% of cases have a lawyer on both sides. Many of these cases are debt collection, eviction – so one theory is that there isn't any defence anyway.

There is additional data in evction cases in which the plaintiff is represented versus those where the defendant is not: in 62 % of those cases, eviction happens. But if there is a lawyer on the other side, its 36%. That's a big difference. Our court system is adversarial, it's designed to have advocates on both sides to ensure a fair fight.

²⁹ O. Ha-Redeye, "access to justice starts with legal tuition", Slaw.ca, 5 may 2013.

³⁰ S. Bock, Barriers blocking access to justice (and how to break them), November 2018. Available at www.relativity.com, accessed on 10 June 2018.

³¹ Ibid.

2.1.4. Lack of Awareness of legal rights, services and procedures

As the old saying goes, “you don’t know what you don’t know” and that’s painfully true for citizens trying to engage with the legal system alone. Many of us simply don’t know what rights we have, what services are available to us, or how to navigate an often cumbersome court system with complex procedures and rules³².

Sadly, even when people do qualify for aid, they may not know it. We do have relief for poor citizens in Cameroon, and it’s an awareness problem – we need to make sure people know about that. We need to increase funding to make people aware of the issue as well as address it directly. It’s difficult because the court can’t fundraise, but we can use creative partnerships to work with other funders and make progress.

2.2. Mechanisms of access to justice

The mechanisms suggested for strengthening the rule of law and the protection of human rights internationally are also relevant for access to justice in Cameroon. Law diffusion, access to counsel and legal aid are such mechanisms developed in this regards³³. According to Bolivar Njupouen, Law diffusion seems a little general as it suggests a diffuse process. However, international tools place more focus on access to counsel and legal aid³⁴. These mechanisms are more accurate for the real ‘need’ of poor people, and focus on real cases. Access to counsel and legal aid appears as a public good, as they have been made an obligation in various international instruments³⁵.

Bolivar Njupouen went further to state that, Legal aid is organized differently depending on whether it is a civil or a criminal issue. As far as criminal justice is concerned, the law requires states to provide lawyers for poor litigants. In this case the judges organize legal aid that is basically representation in courts. They appoint lawyers depending on their qualifications and availability. The law states that Bar Associations can provide lawyers for pro-bono where the state does not provide lawyers that the state pays to that effect.

Civil matters require the direct legal aid of the bar, that is, lawyers appointed by the bar council to work on a pro-bono basis. Bars also organize legal advice in both cases, by lawyers in free consultations. In certain countries there are lawyers working on their own in their chambers on a voluntary basis, provided that it complies with the regulations of the bar association.

Additionally, there are in some countries paralegals, working on a voluntary basis or lowly paid for legal advice³⁶. This is a step, before getting lawyers involved when need be. In the UK, the Citizens Advice Bureaux fulfils this role. The public

³² Ibid.

³³ B. R Njupouen, Access to Justice for the Poor What Role For Bar Associations? The Case of Cameroon, Master of Science In Governance And Development Management, School Of Public Policy International Development Department University Of Birmingham, 2005.

³⁴ B. R Njupouen, Ibid.

³⁵ Ibid.

³⁶ Ibid.

aim of CABx is ‘to ensure that individuals do not suffer through lack of knowledge of their rights and responsibilities or of the service available to them or through an inability to express their needs effectively and equally, to exercise a responsible influence on the development of social policies and services, both locally and nationally’³⁷.

The action of Civil Society through various Non-Governmental Organizations (NGOs) towards promoting law diffusion and legal literacy and advice, all in the aim of improving the outcomes of justice decisions for the poor, should not be forgotten³⁸. Countries have different organisations, which are all, however, based on the principle of free aid and the provisions of the international legal framework. It is the aim of the next section to assess the role of bar associations through such mechanisms.

2.3. Ensuring Access to the Law

International standards provide that bar associations have an obligation to ensure access to the law for all persons in a jurisdiction³⁹. The UN Basic Principles include four articles on access to legal services without discrimination (based on a non-exhaustive list of social status) and with specific provisions for the poor⁴⁰. Additionally, bar associations are to work with governments to ensure that all persons have equal and effective access to legal services and are assisted by lawyers without improper interference (Arts 24-25)⁴¹. Access to legal services not only requires the availability of lawyers and proximity to services, but also necessitates the affordability of legal services or the provision of low-cost or free legal services to groups and individuals who are unable to afford them. The UN Basic Principles call on governments to ensure that there are sufficient resources to ensure legal services to the poor⁴². They also underline, however, the important role that bar associations play in the organization and provision of such services, and in particular in enabling the poor to access them⁴³.

The International Bar Association (IBA) has also argued that one of the key responsibilities of bar associations is to promote free and equal access of the public to the justice system, including the provision of legal aid and advice⁴⁴. To ensure that no person is denied justice, the IBA also states that bar associations should make available the services of lawyers to those unable to pay for such services⁴⁵. In its Pro Bono Declaration, the IBA states that such pro bono services are an integral part of the legal profession and therefore an

³⁷ Citizens Advice Bureaux. Accessed on the 3 august 2018 at ‘http://www.citizensadvice.org.uk/print/index/campaigns/social_policy/briefings/br_legalaffairs/cr-delivering_access_to_justice’.

³⁸ B. R Njupouen, Ibid.

³⁹ Lawyers, Conflict transition, Effectiveness of bar associations in conflict and crisis, December 2016.

⁴⁰ UN Basic Principles on the Roles of Lawyers, (7 September 1990), paras 1-4.

⁴¹ Ibid. paras 24,25.

⁴² Basic Principles, paras 1-4.

⁴³ Ibid.

⁴⁴ International Bar Association, IBA Standards for the Independence of the Legal Profession, Adopted 1990. n. 11, para 18(e).

⁴⁵ Ibid. para 15.

integral part of the role and responsibilities of bar associations⁴⁶.

As both the UN Basic Principles and the IBA suggest, the provision of pro bono legal services should be consistent and permanent as an integral part of the organization of the legal profession. However, the provision of pro bono services are of particular importance during periods of crisis or conflict⁴⁷. As will be discussed further below, where jurisdictions experience upheaval, bar associations have a fundamental role in ensuring that all persons and communities, and particularly the poor and underprivileged, have the opportunity to access legal services.

3. Bar associations and its contribution to access to justice

This section makes an assessment on the role lawyers and Bar associations could play towards access to justice for the poor. We shall first start by examining if the Bar has a special interest on the poor making references to international instruments. We shall go further to reconsider the professional interest of bars and the examples we shall be given will be used to illustrate how the Bar in developed countries deliver legal aid, while at the same time fulfilling their professional interest.

3.1. Does Bar associations have a special interest for the poor

The Basic Principles of the Role of Lawyers, adopted by the 8th United Nations Congress on the Prevention of Crime and the Treatment of Offenders, Havana, 1990, state:

- 1) All persons are entitled to call upon the assistance of a lawyer of their choice to protect and establish their rights and to defend them in all stages of criminal proceedings.
- 2) Governments shall ensure that efficient procedures and responsive mechanisms for effective and equal access to lawyers are provided for all persons within their territory and subjects to their jurisdiction, without distinction of any kind, such as discrimination based on [...], economic or others status.
- 3) Governments shall ensure the provision of sufficient funding and other resources for legal services to the poor [...]. Professional associations of lawyers shall cooperate in the organization and provision of services [...].
- 4) Governments and professional associations of lawyers shall promote programs to inform the public about their rights and duties under the law and the important role of lawyers in protecting their fundamental freedoms. Special attention should be given to assisting the poor [...] persons so as to enable them to assert their rights and where necessary call upon the assistance of lawyers.'

Reference can also be made to the Principles and Guidelines on the Right to a Fair Trial and Legal Assistance in Africa (AU-ACHPR, 1994 cited in Baderin, 2005), which states:

⁴⁶ IBA, IBA Pro Bono Declaration, 16 Oct 2008, paras 1-2. Available at <http://www.ibanet.org/Document/Default.aspx?DocumentUId=C4B06FD6-A807-44D4-A98A-C73B464589C6>

⁴⁷ Ibid

'(f) Professional associations of lawyers shall co-operate in the organization and provision of services, facilities and other resources, and shall ensure that:

- 1) When legal assistance is provided by the judicial body, lawyers with the experience and competence commensurate with the nature of the case make themselves available to represent an accused person or party to a civil case;
- 2) Where legal assistance is not provided by the judicial body in important or serious human rights cases, they provide legal representation to the accused or party in a civil case, without any payment by him or her.'

The aforementioned are clear on the duties of lawyers. Having said that, it is important to explore their original interests.

3.2. The role of bar associations

3.2.1. To provide aid

A Bar Association is a professional association of lawyers. Some Bar associations are responsible for the regulation of the legal profession in their jurisdiction; others are professional organizations dedicated to serving their members; in many cases, they are both. In many commonwealth jurisdictions, the bar association comprises lawyers who are qualified as barristers or advocates in particular, versus solicitors. Membership in bar associations may be mandatory or optional for practicing attorneys, depending on jurisdiction⁴⁸. Bar Associations, as the above suggests, could be seen as aiding access to justice. The profession helps people regardless of their wealth to have access to justice. Talcott⁴⁹ supports this theory as he writes: 'his [the lawyer's] function in relation to clients is by no means only to 'give them what they want but often to resist their pressure and get them to realize some of the hard facts of their situations, not only with reference to what they can, even with clever legal help, expect to get away with but with reference to what the law will permit them to do.' Lawyers defend their clients' interests and consider their problems as theirs.

Furthermore, given the gap between various groups and the imbalance of justice, mechanisms are put in place and lawyers and bars play an important role: 'lawyers [...] display their altruism in providing gratuitous or low-cost services; but the magnitude of such charity seem to vary inversely with how extensively it is publicized – conspicuous production being the necessary complement of compactors consumption'⁵⁰. However although they assist the poor through pro-bono activities, lawyers also have professional interests to fulfil⁵¹.

3.2.2. Hindrances

Lawyers generally practice to make a living and gain money. They interact with their clients, who have their own

⁴⁸ Available at: https://en.wikipedia.org/wiki/Bar_association, Accessed on 08 October 2019.

⁴⁹Talcott Parson, 1964, p.384, quoted by Abel Richard L., The Legal Profession in England and Wales. Oxford: Basil Blackwell, 1988. pg. 26.

⁵⁰ Abel Richard L., The Legal Profession in England and Wales. Oxford: Basil Blackwell, 1988. pg. 30.

⁵¹ B. R Njupouen, Ibid.

interests, that of being advocated, and who trust them and give them the authority to represent and defend their interests. The challenge in such relations is to have a win-win draw that satisfies each party⁵². But what sometimes happens is that the agents overlook their own interests and Bowles⁵³ writes on this relationship when he says 'the moral hazard arising from the lawyer-client relationship is a standard principal-agent problem in which there is a conflict of interest between two parties and an asymmetry of information between them.' For instance, the client agrees to pay the lawyer an hourly rate, 'w' and delegates to the lawyer the choice of how many hours of work 'h' to devote to the matter. An honest lawyer will only act in what s/he judges to be the best interests of her client and will choose the hours 'h' which would be recommended by an impartial observer. The unscrupulous lawyer, however, can maximize profits by suggesting to the client that the prospects of the case are better than they really are, in an effort to persuade the client that the best solution is to spend 'h**' hours on the case⁵⁴. In this situation, the client who lacks sufficient knowledge may have to spend more and wait longer for results. As aforementioned, 'justice delayed is justice denied.' This is an example of hindering access to justice.

Moreover, citizens who can't pay legal representation are unable to represent themselves because of the restrictions placed by the Bar Association. 'In most legal systems, private citizens are not even allowed to appear in court to present their own cases, a monopoly of competence is bestowed on the legal profession. Legal rules therefore require litigants to use Lawyers, who in turn are rare and expensive⁵⁵. An extreme example is in Chad, where there are roughly 100 judges and seven practising lawyers for six million people⁵⁶. In such circumstances, instead for a lawyer to defend the poor against abuses, they will rather concentrate on making money⁵⁷. It has been noted that professions generally tend to neglect the public good, despite claims to be 'refining their technical skills in the service of society⁵⁸' due to their self-interest. This would also appear to be true for the legal profession.

Much more could be written on how Bars hinder justice. However, certain Bar Associations where human rights and good governance have been proven demonstrates how difficult it is to reconcile both the interests of lawyers and those of their clients. This is illustrated below with the French and English Bars.

⁵² B. R Njupouen, Ibid.

⁵³ R. Bowles, Reform of Legal Aid and the Solicitors' Profession in Hume papers on Public Policy, vol.4 No 4: access to justice. Edited by Frank Stephen. Edinburgh: University Press, 1996.

⁵⁴ Bowles 1996, Ibid.

⁵⁵ B. R Njupouen, Ibid.

⁵⁶ Webb, Ibid. Pg. 50

⁵⁷ M. Anderson, Access to Justice and Legal Process: Making Legal Institutions Responsive to Poor People in LDCs, comment paper on access to justice and legal process, paper for discussion at WDR Meeting, 2003. Pg. 16-17. Accessed on 25 July 2018 at www.penalreform.org/download/commentonthediagramsofproblems.

⁵⁸ Abel 1988, Ibid. Pg. 30

3.3. The experience of renowned international Bars
The mechanisms of legal aid are similar in all countries. To avoid being repetitive, the following examples focus on innovative features.

3.3.1. The English Bar and the British examples The Bar Council of England

The Bar of England is an example of a strong commitment in delivering access to justice for the poor. The Bar Council critically responded to a Government White Paper by stating that: "the aims of the Bar of England are to ensure:

- Justice: that everyone can obtain justice in the Courts within a reasonable time and at a reasonable expense;
- Access: that everyone has the best possible access to the services of lawyers of the calibre they need, both solicitors and independent and specialist barristers;
- Choice and competition [...];
- Cab-Rank Rule: that barristers are available to represent everyone requiring legal representation whether in criminal or civil proceedings whoever they may be and whatever their cause;
- Quality and Standards [...]; Fair and Reasonable Price [...]; Advocacy [...]; Legal Advice: that objective advice of high quality is available from solicitors and other professionals from an independent Bar;
- Quality of Judges [...]"⁵⁹.

This commitment is also seen in the organisation of the English Bar, there are several specialisation branches such as the English Society of Labour Lawyers and many services for legal aid, such as the Legal Service Commission, the Legal Aid practitioner group, the Bar pro-bono group, the Free Representation Unit, and the legal aid policy service at the Law society⁶⁰.

Nevertheless, Critics were clear that "the legal profession as presently organized has failed to provide high quality legal services to persons in such capacities as consumers, welfare beneficiaries, or enjoyers of clean air [...] a movement has now begun to provide diffuse interest with the advocacy services of quality corporate law firms, and Pr. Handler's Essay on 'Public interest Law Firms in the United States' examines the most important manifestation of this new type of lawyer. Private foundation-sponsored public interest law firms, operating since about 1970, began the process of finding means to redress the imbalance of advocacy⁶¹, which hinders the enforcement (and further development) of important new rights on enforcement.

In fact, with the growing demand of free legal consultation supposedly due to the government, according to the Bar: "The government has for ten years reduced the availability of legal aid and thus greatly increased the numbers of those with small means who cannot afford necessary legal advice and representation"⁶², the state has increased mechanisms to make legal aid, and thus the Bar, more efficient. Many other institutions have been helping with legal advice before lawyers are required in the courts or elsewhere to represent

⁵⁹ Bar Council 1989, Pg. 1-2

⁶⁰ B. R Njupouen, Ibid.

⁶¹ Cappelletti, M. (Ed), Access to Justice and the Welfares state, Martinus Sijthof Publishers, Neetherlands, 1981.

⁶² General Council of the Bar, 1989, Pg.8,

poor litigants⁶³. These include Ombudsman, Law Centres, Legal Advice Centres and more significantly, Citizen Advice Bureaux.

British Citizens Advice Bureaux

Citizens Advice Bureaux, or CABx, is a network of independent charities throughout the United Kingdom that give free, confidential information and advice to assist people with money, legal consumer and other problems⁶⁴. The twin aims of the Citizens Advice service are “to provide the advice people need for the problems they face” and secondly “to improve the policies and principles that affect people’s lives”⁶⁵. This research and campaigns agenda also known as social policy is more preventative in nature and designed to stop problems arising in the first place⁶⁶.

‘The Citizens Advice Service is a key agency involved in helping people gain access to justice in today’s society and its role is to ensure that ‘individuals do not suffer from lack of knowledge of their rights and responsibilities, or of services available to them, or their inability to express their needs effectively and equally to exercise a responsible influence on the development of social policies and services, both locally and nationally.’⁶⁷ However, the Bar makes it clear that ‘the Citizens Advice Bureaux, Law Centres and Legal Advice Centres cannot be used as a substitute for a proper system of legal aid’⁶⁸.

Despite this, it is noticeable that between 2016 and 2017, it helped 2.7 million people with 6.3 million problems and over 48 million people visited their digital service⁶⁹. This amply illustrates the impact such institutions have on access to justice and legal aid. This is likely to solve the problem of effectiveness and will make the Bar and Lawyers more effective as they contribute at a higher level.

3.3.2. The French Bars and CARPAs

In France, there is something called CARPA (*Caisses des Reglements Pecuniaires des Avocats*). It means that lawyers are not allowed to hold clients’ money, but must pay it into the bar’s account, under the control of the president of the bar. There are over 100 CARPAs in France, and each is under the political and ethical control of the local bar, rather than of a central body or a financial institution⁷⁰. CARPA is not itself a bank, but works with banks.

The French are very proud of their system, for a number of reasons. First, it guarantees the safety of client funds. They don’t need a Compensation Fund like that in the USA and

⁶³ Hansen, Ole, *Legal aid in Practice-3rd Edition*. London: Legal Aid Action Group, 1993.

⁶⁴ J. Insley, *Citizens Advice Cuts threaten the most vulnerable money*, the Guardian, retrieved 21/05/2019

⁶⁵ Campaigns, available at www.enfieldcab.org.uk, accessed on 18 July 2018

⁶⁶ Available at: <https://livewell.oxfordshire.gov.uk/Services/3393>, Accessed on 15 September 2019

⁶⁷ B. R Njupouen, *Ibid*.

⁶⁸ General Council of the Bar, 1989. Pg. 9

⁶⁹ Wins charity of the Year, Citizens Advice. Retrieved on 23 February 2018.

⁷⁰ J. Goldsmith, *Compensation Fund – Can we learn from France?*, the Law Society Gazette, 16th July 2009.

England, because clients’ money is not susceptible to theft by individual lawyers, all going to the bar. Secondly, transactions relating to the funds are immediately traceable, and so they believe that money laundering and other lawyer-related financial crime become impossible, or nearly so. Lastly, although there are rules for paying interest to clients in exceptional cases relating to length of time or size of deposit, the usual rule is that the interest remains with CARPA. The interest payments accrued to CARPA in this way are sizeable, and, once CARPAs own expenses have been paid, they go towards public interest activities undertaken by the bars (such as the Paris Bar’s Solidarity Bus, which travels around Paris giving free legal advice to citizens)⁷¹.

This will be perfect in Cameroon where corruption is very high. The French government is so convinced of the respectability of the system that they gave responsibility for payment of all legal aid funds to the CARPAs as well in 1991. There are two things in play here, which do not need to go hand in hand. First, the bar controls all client money, taking it out of the control of individual lawyers. It is a disciplinary offence for a lawyer not to hand over clients’ money to the CARPA system. Secondly, the interest payments by and large go to the bar⁷². It seems to me that you could have the first without having the second. Would it work here? I am throwing it into the ring as something to think about, but I know that it has been considered before, but is not yet operational to date. Here are some possible reasons why it’s not operational till date.

First, France has a fragmented system of local bars – over 180 of them, more than there are cheeses. Well over half of them have fewer than 100 lawyers. Apart from the Paris Bar and maybe a handful of larger cities, the rest are very small, and indeed the total size of the French profession is under half that of ours. That contrasts with the centralised system in England and Wales, where the regulator would have to manage singlehandedly the accounts of over 100,000 solicitors⁷³ and over 5000 solicitors in Cameroon.

Second, the work of French lawyers – *avocats* – is different to that of solicitors, in that the *avocats* work is a notarial system where notaries undertake real estate, family and other work which traditionally involves the transfer of large sums of money. Therefore, I assume that the sums passing through solicitors’ accounts are much, much larger, and probably more complex, than those passing through the accounts of *avocats*. On top of that, although Paris is also a financial centre, the combination of the nature our country and the work of solicitors would make handing the law firms’ accounts particularly challenging.

But I’m still trying to be positive, and offer it as something to be considered when pockets are smarting from the way that we handle clients’ money. Look across the channel – there might be another way.

4. The Cameroonian bar association

It is argued that before showing particular interest on the poor, the Bar should be free and apt in defending everyone,

⁷¹ *Ibid*.

⁷² J. Goldsmith, *Ibid*.

⁷³ *Ibid*.

thus contributing to the enforcement of the rule of law⁷⁴. The suggestion that the Bar be independent appears to be relevant in the case of the Cameroon Bar. Moreover, there are serious concerns in Cameroon over the significant role the Bar Association could play in legal aid for the poor. However conflicts of interest and poverty in general continue to threaten this. Paralegals and CARPA are suggested solutions for an efficient legal aid system in Cameroon⁷⁵.

Section 4.1 examines the Bar's role towards access to justice for the poor. The next section makes an assessment of the Cameroonian legal aid system by examining its nature 4.2 and making an appraisal 4.3.

4.1. The bar towards justice for all

In his analysis on the state of the rule of law in Cameroon, Justice A.N.T. MBU (2000)⁷⁶ suggested: 'the rule of law is freedom under the law. Freedom under the law is equality before the law: Equality before the law is equality of protection by the law. Protection under the law means due process of law: due process of law means trial by your own peers, anybody whose rights have been violated, has a right to remedy given to him by the law'. The due process suggests not only an independent Magistracy, but also an independent Bar. Muna⁷⁷ exploring the role of the Cameroonian Bar in the processes of social justice asked "is the independence of the Bar as vital as the independence of the Judiciary?" and cited the Canadian Bar Association Committee⁷⁸ to reply:

"In the first place, access to an independent legal expert is just as critical for a viable legal system as access to an independent judge. [...] Without such a legal expert, there can't be any true access to the legal process at all, with equivalent injustice and alienation. In the second place of the two, the legal expert's independence is the more difficult to ensure. A legal expert must be free to oppose and frustrate both government interests and public sentiment."

The Bar can perhaps be seen as a watchdog which plays a role in ensuring the rule of law and, through this, access to justice for all. The Cameroonian Bar association comprises 1500 lawyers, almost one lawyer for 10000 citizens, autonomously managed by the Bar Council whose members are elected by their peers⁷⁹. As lawyers work on their own and the Bar is managed as described above, the profession is independent. Section 1 of the law regulating practice at the Bar stipulates that the legal profession is independent, and honorariums are discussed between clients and lawyers⁸⁰. The problem with the Bar's role in access to Justice is its

⁷⁴ B. R Njupouen, Ibid.

⁷⁵ Ngatchou Toto Carles. An Assessment of Cameroon's Legal Aid System as an Instrument to Promote Access to Justice for the Poor. Journal of Constitutional Law and Jurisprudence. 2019; 2(2): 54-65p.

⁷⁶ Mbu, ATN. 2000. The Common law in Cameroon: Lecture on 'The rule of law'.

⁷⁷ Ibid. Pg 97

⁷⁸ Canadian Bar Association Committee. 2000. The independence of the Judiciary in Canada. Ottawa Ontario: The Canadian Bar Foundation.

⁷⁹ B. R Njupouen, Ibid.

⁸⁰ Recueil de lois.1990.Droits et Libertés. Yaounde:SOPECAM

conformity with the required conditions and its capacity to defend everyone. To some extent, it can be said that the Bar, since its creation in 1972, has succeeded in keeping its independence⁸¹ despite temptations and its members provide defence to all (poor and rich). But beyond that, the challenge is to determine what role the Bar plays specifically for the poor.

4.2. The Nature of the Cameroonian Legal Aid System

Legal aid can be defined as a system or a mechanism that allows the underprivileged to benefit from total or partial procedural fees like registration fees, bailiff, notary or expert fees. It is also considered as an aid to any natural persons whose resources are insufficient to defend their interests. Within this perspective, legal aid enables the beneficiary to obtain either court judgment or the enforcement of it with no prior payment of all or part of the costs which he ought to have paid. In this circumstance, legal aid concerns all expenses by the courts, procedures or acts for which it is granted. Article 2 of the 2009 law referred to above states that, legal aid is said to be total when it is not limited to certain acts nor specific stages of the procedure and partial if the decision granting it indicates that it is limited only to certain specific acts or specific procedure⁸².

But then, there is a resurging question as to what are the conditions for obtaining legal aid? The realistic response is that; not everyone can claim legal aid, although its scope has been expanded with the new law. Therefore, only a specific category of people can benefit from it. In order to enlighten the public, the law enumerates in its Article 5 persons eligible to apply for legal aid. They are the indigenes, that is to say the extremely poor and needy, persons subject to the discharge tax etc. It is also granted to natural persons whose resources are inadequate to have their rights enforced by a court or to follow up the enforcement of any writ or process of execution obtained without legal aid or an unemployed wife with minor children in proceedings of divorce with her husband⁸³.

Legal aid may exceptionally be granted to moral persons with inadequate resources to enforce their rights in court. Article 6 of Chapter 2 extends its beneficiaries to workers who are victims of an accident at work, claiming for compensation against their employers and an unemployed wife who has no resources and has been deserted by her husband so that she can obtain from the court an order of maintenance for herself or for the children under her custody. Other beneficiaries from legal aid are persons under death sentence making an appeal, whose defence was not handled by an advocate before the lower court.

4.3. An Appraisal of the Cameroonian Legal Aid System

In this section, an appraisal of the Cameroonian legal aid system is made with emphasis on its practice and what has been done so far to better access its effectiveness on the poor.

⁸¹ Muna, 1993

⁸² Ngatchou Toto Carles. An Assessment of Cameroon's Legal Aid System as an Instrument to Promote Access to Justice for the Poor. Journal of Constitutional Law and Jurisprudence. 2019; 2(2): 54-65p.

⁸³ Ibid

4.3.1. Legal Aid Centres

With the objective to attain “access to justice for all”, the Bar created legal aid centres at various courts for those who cannot afford lawyers⁸⁴. The Bar realized that the poor lost cases in court either because they were not aware that they were entitled to free legal aid, did not understand the complex legal procedures or were legal illiterates or simply illiterates. Although ignorance of the law is not an excuse, the Bar thought it wise that the underprivileged should not suffer from ignorance of their rights. The Bar provide assistance to indigenes who could provide a certificate of indigence, minors, women and victims of massive exploitation of land. Moreover, legal aid provides legal information for every litigant, guides them through their legal procedures and assist them in every step of their judicial procedure⁸⁵.

4.3.2. International donors

International donors also fund legal aid in Cameroon. For instance, at the initiative of the Canadian Cooperative, the first of three centres was created at the court of Appeal in Yaoundé. Following this, the British Council also opened a legal aid centre in Bamenda which covers the North West Region and that which was created in Kumba was transferred to Buea and covers the whole of the South West Region⁸⁶. Funds are not used to pay lawyers. Lawyers are paid *pro bono*. Generally, it concerns all lawyers, but in practice it is left to unexperienced lawyers and beginners. A roster is normally drawn with lawyers working on shift. They receive clients and provide legal assistance or advice depending on the nature of the problem.

These legal aid centres provide aid to many Cameroonians. Although the statistics from the Bar association may seem insignificant⁸⁷, it nevertheless shows that lawyers are participating in improving access to justice for the poor. These lawyers provide their services *pro bono* and the Bar does not remunerate them.

Another project which provides legal aid in Cameroon is PACDET, as it helps prisoners gain access to justice.

4.3.3. PACDET Project88

This is a program for the amelioration of the conditions of detention for prisoners and the respect of Human Rights. This project was launched in 2002 by the European Union as a result of studies and research which showed that several citizens were awaiting judgments in very bad conditions of detention⁸⁹. The British Council manages it and the Cameroon Bar Association provides expertise.

It effectively began on 30 June 2007 in certain prisons in Cameroon like that of Bertoua in the Eastern Region of the country. The general objective of this programme is to

⁸⁴ B. R. Njoupouen, Access to justice for the poor: What role for Bar Associations? The case of Cameroon, Master's Thesis, University of Birmingham, 2005.

⁸⁵ Ibid.

⁸⁶ Ibid.

⁸⁷ Cameroun Bar Association. 2000. Evaluation des conditions de détention dans les prisons au Cameroun. Yaoundé.

⁸⁸ Programme pour l'amélioration des conditions de détention et respect de droit de l'homme.

⁸⁹ Ibid.

improve the respect of Human Rights in Cameroon by ameliorating the judicial and prison system in general and more particularly to reduce the dysfunctions and abuses linked to detention, precisely pre-trial detention.

Lawyers assist prisoners in enrolling their cases for judgment⁹⁰, with some simply need medical treatment, legal advice or release for medical or other reasons. Generally these prisoners lack information, not only because of their literacy level but also because of their situations as detainees and the way they are treated in prisons.

The Bar signed an agreement with the project to provide lawyers who are experts. These lawyers provide legal assistance to these prisoners. Lawyers assigned by the bar council don't receive money from their clients. They receive a sum of 25000 XAF (Central African CFA Franc) equivalent to \$45 per session⁹¹, which is very low compared to the amount they normally agree with their clients⁹². One may be tempted to say that lawyers through this project contribute significantly in helping the poor gain access to justice, which is not the case as shall be illustrated subsequently.

The above efforts notwithstanding, access to justice through legal aid and assistance is still a major problem in Cameroon.

4.3.4. Conflict of Interest

Cameroonian lawyers have sometimes become an obstacle to access to justice for their clients instead of serving as catalyzers. They have difficulties in fulfilling their client's interest with theirs. When a lawyer for example, who also acts as an agent, defends his client in a case of a serious accident which resulted to death, physical or mental incapacity or the loss of an organ, and subsequently damages are paid, it is his duty under Cameroonian law to collect the money and give to his clients. Even though lawyers and their clients generally agree in advance on a fixed sum to be paid to the lawyer, some lawyers are tempted after recovering the money to keep more than what they should⁹³. Many of these cases have been reported to the Bar council⁹⁴. The consequences of such actions are that; lawyers illegally enrich themselves, increase in poverty for the clients and access to justice is generally undermined, particularly for the poor. In fact there is a conflict of interest between both parties. Furthermore, the reputation of the Bar is undermined as the society generally have a negative opinion of lawyers. Mechanisms have been put in place to deal with such cases and this assures good governance within the profession⁹⁵. Many of such complaints have been brought before the Bar council and these types of actions have an impact on access to justice in Cameroon.

Another problem is that of lawyers who retain their client's documents and do not assist to court sessions even after receiving payment. They maximize profits and take other

⁹⁰ PACDET. 2002. Convention –cadre de soutien entre le Pacdet et le .barreau du Cameroun.

⁹¹ Ibid.

⁹² Ordre des avocats de Paris. 2002. Les dossiers du barreau de Paris: Maîtrise et transparence des honoraires, Nov.2002, No 1, Paris :Publications de l'Ordre.

⁹³ N. M. Ebénézer, De l'Excellence à la Médiocrité, Yaoundé: Editions Clé, 1970.

⁹⁴ Ibid.

⁹⁵ Republic of Cameroun 1990.

jobs. Additionally, in the poverty context, lawyers take money from their clients and make fake arrangements with the lawyers of the adversaries who make good offers. This is sad because magistrates are sometimes involved in this kind of poor justice, especially when the interest of the rich and most powerful are involved. This situation where the powerful and rich dominate over the poor is an obstacle to access to justice for all. As Windsor Harriet, an ambassador rightly said:

'The promise to assure all citizens equal rights before the law is good, but the reality is absolutely essential and, I am sorry to say, it is not always apparent. Too often, and we all know this to be true, the letter of the law is not respected in Cameroon. [...]. At times certain individuals with political influence, with financial clout, enjoy an advantage over their opponents in the courts, and justice does not prevail. [...]. Sometimes certain influential individuals have succeeded in pressurising the courts to issue judgments that respond less to the law than to individual will...'⁹⁶

From another perspective, some pupils are sent by some lawyers to deal with the poorer clients. Given that, these pupils are not paid by their masters according to the internal regulation of the Bar council, nor given transport money, they are likely to collect money from their clients and this can have serious consequences on the poor.

The Bar is aware of these problems and tries as best as possible to deal with them, with the objective of assuring access to justice for the poor. Nevertheless, legal aid in Cameroon is still a nightmare attached with strings. Certain recommendations are suggested below for the Cameroonian state and the Bar.

4.3.5. The Creation of CARPA and paralegals in Cameroon

CARPA (not yet in force) was put in place by the Bar in order to ensure good representation. Cross sections of the constitution state that CARPA are non-lucrative entities which are under the patronage of the Bar Council; the interests generated at the bank shall be used by the bar council to fund training and to supplement legal aid⁹⁷.

It is also important to consider the distribution of lawyers across the country. There are approximately 1500 lawyers for 16 Million people: more than 1/10000, which is not quite sufficient⁹⁸. As the Bar has the positive attitude of copying from renowned foreign bars, it is suggested that paralegal bodies, such as citizen's advice bureaux, be established to help with legal information, as in England. They would also cover the national territory more fully as lawyers are concentrated in main cities and do not often move to provide legal advice. If local paralegals covered that, it would only be left to lawyers to make the trip in order to cover representation before the courts for a proper legal aid. The benefit of this would be to limit lawyers to representation, in such a way that they would have sufficient time for their

other richer clients. This is likely to decrease conflicts of interests.

5. CONCLUSION AND RECOMMENDATION

5.1. Conclusion

Justice can only be accessed if it is shared equitably among citizens. The reality is that the wealthy and privileged are likely to have justice on their side, either because of their influence over those rendering justice, lack of rule of law, corruption or political influence, or simply because others cannot afford fees for good lawyers. In practical terms, lawyers are contributing towards access to justice by assisting their clients, regardless of their status, with advice and/or defence. However, some lawyers are hindering access to justice because they have not been able to reconcile their professional interests with that of their clients. Such cases were reported and it was found that poverty, a flexible rule of law and a high rate of corruption might hamper access to justice for lower classes.

Nevertheless, in Cameroon the Bar has taken significant steps in ensuring access to justice for the poor. An admittedly insufficient number of lawyers has intervened in advising and representing certain categories of poor people through legal aid. The Bar has also established legal aid centres, where lawyers provide legal advice and representation in courts free of charge for certain relevant cases among indigents, women, minors, and victims of violation of human rights. Funds provided by the European Union enabled the Bar in assisting prisoners for little or no payments. Although the Bar council punishes behaviours which are contrary to the exigencies of loyalty and probity, the indelicacy of certain members of the Bar council continue to render justice inaccessible for the poor. Moreover, to prevent the mismanagement of clients' funds by lawyers, the Bar Council introduced CARPA. Analyses suggest that the Cameroonian Bar, like other Bars, helps more than it hinders access to justice. To conclude, the Cameroonian Bar contributes significantly to improving access to justice for the poor. However, there is still much to be done. Certain recommendations are suggested below for the Cameroonian Bar and State.

5.2. Recommendation

The Bar should inculcate the altruistic spirit of lawyers through training and disciplinary sanctions. This will create a suitable environment for the rule of law which is an indispensable condition for access to justice for the poor.

Necessary steps should be taken in order for CARPA to go operational in Cameroon. This will be beneficial not only to the bar association, but also to lawyers, their clients and the state. It is a secure and efficient way of dealing with clients' money and thereby improving access to justice. Banking interest gotten from this money will enable the Bar to finance legal aid and training.

Moreover, to cope with the scarcity of lawyers, it is suggested that paralegals could contribute in providing legal advice while lawyers concentrate on representation in court. In this regard, The State and Civil society should provide structures like CABx in the UK, with the aim of reaching the MDGs and donors should add subsidies for legal aid and legal education.

⁹⁶ MBU, ATN, The Common law in Cameroon: Lecture on 'The rule of law', 2000

⁹⁷ (Ordre des Avocats du Cameroun, 2004 and UNCA, 1999).

⁹⁸ B. R. Njupouen, Access to justice for the poor: What role for Bar Associations? The case of Cameroon, Master's Thesis, University of Birmingham, 2005.