

**REQUEST FOR APPLICATIONS (RFA)
DEVELOPMENT OF A RISK-ALIGNED AML/CFT SANCTIONS REGIME FOR THE LEGAL
SECTOR, IN SUPPORT OF THE NBA-AMLC**

SECTION 1: INTRODUCTION AND BACKGROUND

African Center is the implementing partner for the FCDO-funded project on Tackling Illicit Financial Flows (IFFs) through Asset Recovery and AML/CFT Strengthening, which supports Nigerian institutions, including the Nigerian Bar Association Anti-Money Laundering Committee (NBA-AMLC), to embed sustainable AML/CFT compliance practices within the legal profession.

This project is anchored within the African Center's long-standing mandate to strengthen Nigeria's anti-corruption, asset recovery, and AML/CFT architecture.

Nigeria's exit from the FATF Grey List in October 2025 has opened a critical consolidation window in which sustained reform is essential to avoid re-listing. FATF's public statement on Nigeria's delisting specifically flagged the need for continued, effective supervision of Designated Non-Financial Businesses and Professions (DNFBPs), including lawyers, an area where Nigeria continues to demonstrate only moderate effectiveness.

The 2024 Legal Sector Risk Assessment (LSRA) identified significant money laundering, terrorism financing, and proliferation financing (ML/TF/PF) vulnerabilities within the legal profession, driven in part by weak enforcement mechanisms for non-compliance. In response, the NBA Anti-Money Laundering Committee (NBAAMLC) developed a three-year Action Plan that identifies the establishment of a dedicated sanctions regime as a priority reform.

Currently, while the NBA Rules of Professional Conduct (RPC) 2023 contain general disciplinary provisions under Chapter 2, there is no dedicated, risk-aligned sanctions framework that specifically addresses AML/CFT non-compliance by legal practitioners. This gap limits the NBA-AMLC's ability to enforce meaningful consequences for non-compliance and weakens the credibility and deterrent effect of its supervisory mandate.

1.3 Purpose of this Request for Applications

African Center is therefore inviting qualified individual consultants or consulting firms with expertise in legal ethics, professional disciplinary law, and AML/CFT regulation to submit applications to support the development of a comprehensive, risk-aligned AML/CFT sanctions regime for legal practitioners in Nigeria. The assignment will be delivered in close collaboration with a specialised drafting team to be constituted by the NBA President in collaboration with the AMLC, comprising six (6) experienced members drawn from the Legal Practitioners Disciplinary Committee (LPDC) and the Body of Benchers. The selected consultant will provide technical and secretariat support to this drafting team throughout the assignment.

SECTION 2: OBJECTIVES OF THE ASSIGNMENT

The overall objective of this assignment is to provide technical assistance to the NBA-AMLC and its specialised drafting team in developing a robust, proportionate, and enforceable AML/CFT sanctions regime tailored to the obligations of legal practitioners, fully aligned with Chapter 2 of the Rules of Professional Conduct (RPC) 2023 and existing NBA disciplinary processes.

2.1 Specific Objectives

- Provide technical and secretariat support to the six (6)-member specialised drafting team constituted from the LPDC and Body of Benchers throughout the development of the sanctions regime.
- Conduct a comprehensive review and gap analysis of existing disciplinary provisions under Chapter 2 of the RPC 2023 as they relate to AML/CFT obligations.
- Conduct a comparative review of sanctions regimes applied by comparable self-regulatory legal and professional bodies in other jurisdictions, to inform best-practice design choices.
- Draft a comprehensive sanctions framework that defines AML/CFT-related offence categories, establishes a graduated, proportionate, and dissuasive sanctions ladder, and sets out clear procedures for investigation, referral, hearing, and enforcement.
- Ensure the sanctions regime fully leverages and aligns with the existing disciplinary expertise, authority, and procedures of the LPDC, without creating duplicative or conflicting processes.
- Facilitate structured validation engagements with the NBA-AMLC, LPDC, and Body of Benchers to test, refine, and build consensus around the proposed framework.
- Produce a final, NBA Council-ready sanctions regime package, including an accompanying enforcement procedures manual and a brief for formal adoption.

SECTION 3: SCOPE OF WORK AND KEY DELIVERABLES

3.1 Phase 1 — Inception, Review, and Drafting Team Engagement (Weeks 1–2)

- Conduct a desk review of the RPC 2023 (particularly Chapter 2), the Legal Practitioners Act, NBA AMLC's mandate and three-year Action Plan, the 2024 LSRA findings, and the Money Laundering (Prevention and Prohibition) Act 2022.
- Hold an inception meeting with the NBA-AMLC Secretariat and the specialised drafting team to agree on working methods, meeting cadence, and division of labour between the consultant and the drafting team.
- Submit an Inception Report setting out the refined methodology, detailed work plan, and a stakeholder engagement matrix.

3.2 Phase 2 — Comparative Analysis and Gap Assessment (Weeks 3–4)

- Undertake a comparative analysis of AML/CFT sanctions regimes applied to legal practitioners by self-regulatory bodies in at least three comparator jurisdictions (e.g., UK Solicitors Regulation Authority, Law Society of comparable African jurisdictions, and one additional relevant comparator).

- Identify and document gaps in the current RPC 2023 Chapter 2 disciplinary framework as it relates to AML/CFT-specific misconduct.
- Submit a Comparative Analysis Brief summarising findings and key design recommendations for the drafting team's consideration.

3.3 Phase 3 — Drafting of the Sanctions Framework (Weeks 5–7)

Working directly with the specialised drafting team, the consultant shall support the development of a draft sanctions framework that, at minimum, addresses:

- Definitions and scope: clear delineation of AML/CFT-related professional misconduct (e.g., failure to conduct CDD, failure to file STRs, failure to maintain records, facilitation of beneficial ownership concealment).
- Categorisation of offences by severity and risk level (e.g., minor, serious, and grave breaches).
- A graduated, proportionate, and dissuasive sanctions ladder, ranging from warnings and remedial directives to fines, suspension, and recommendation for disbarment in the most serious cases.
- Aggravating and mitigating factors to be considered in determining appropriate sanctions.
- Clear procedures for investigation, referral to the LPDC, conduct of disciplinary hearings, rights of the accused practitioner, and appeal mechanisms.
- Provisions on transparency and publication of sanctions outcomes, consistent with due process and confidentiality considerations.
- Alignment mapping showing explicitly how each provision of the new sanctions regime correlates with and operationalises Chapter 2 of the RPC 2023.
- Submit Draft Sanctions Framework (Version 1) for stakeholder validation.

3.4 Phase 4 — Stakeholder Validation (Weeks 8–9)

- Organise and facilitate structured validation sessions with the NBA-AMLC, the specialised drafting team, and other key stakeholders to review and stress-test the draft framework.
- Where appropriate, conduct a limited consultation with a small sample of NBA branch leaders and legal practitioners to assess practical clarity and perceived fairness of the proposed sanctions ladder.
- Submit a Stakeholder Validation Report summarising feedback received and proposed revisions.

3.5 Phase 5 — Revision, Enforcement Procedures, and Finalisation (Weeks 10–12)

- Revise the sanctions framework to incorporate validation feedback, producing Version 2 of the framework.
- Develop an accompanying Enforcement Procedures Manual detailing step-by-step processes for case intake, investigation, evidentiary standards, hearing conduct, decision-making, sanctions imposition, and record-keeping.
- Prepare a concise Adoption Brief for the NBA Council, summarising the rationale, structure, and expected impact of the sanctions regime, to support formal adoption.
- Submit the Final Sanctions Regime Package, comprising the finalised sanctions framework, enforcement procedures manual, and adoption brief, in both editable and print-ready formats.

3.6 Summary of Deliverables and Timeline

No.	Deliverable	Description	Timeline
1	Inception Report	Methodology, work plan, review of RPC 2023 Chapter 2 and comparator regimes	Week 2
2	Comparative Analysis Brief	Review of sanctions regimes used by comparable self-regulatory legal bodies	Week 4
3	Drafting Team Engagement Report	Record of structured engagement with LPDC and Body of Benchers nominees	Week 5
4	Draft Sanctions Framework (v1)	First draft of the AML/CFT sanctions regime, including offence categories and sanctions ladder	Week 7
5	Stakeholder Validation Report	Findings from validation sessions with NBA-AMLC, LPDC, and Body of Benchers	Week 9
6	Revised Sanctions Framework (v2)	Framework revised to incorporate validation feedback	Week 10
7	Enforcement & Procedures Manual	Procedures for investigation, referral, hearing, and enforcement of sanctions	Week 11
8	Final Sanctions Regime Package	Final, NBA-Council-ready sanctions regime, manual, and adoption brief	Week 12

SECTION 4: ELIGIBILITY CRITERIA

Applications are open to qualified individual consultants, consulting firms, and legal/regulatory advisory practices with demonstrable expertise in professional disciplinary law, legal ethics, and AML/CFT regulation. Applicants must meet all of the following minimum eligibility requirements:

4.1 Mandatory Eligibility Requirements

- Legal registration in Nigeria or an internationally recognised jurisdiction as a consultancy firm, law firm, or professional services entity (for institutional applicants); or valid professional credentials, including a current legal practice qualification, for individual consultants.
- Minimum of seven (7) years of demonstrated experience in at least two of the following areas: professional disciplinary law, legal ethics and regulation, AML/CFT compliance, or regulatory enforcement framework design.
- Demonstrated experience drafting disciplinary codes, sanctions frameworks, or enforcement procedures for a professional, regulatory, or self-regulatory body.
- At least one (1) documented completed assignment involving technical work with or for a bar association, law society, professional disciplinary body, financial intelligence unit, or comparable institution, with preference for experience in Nigeria or other African jurisdictions.

- Team leader or lead consultant must be a qualified legal practitioner holding a minimum of a postgraduate degree in Law or a related field, with demonstrable familiarity with the Nigerian Rules of Professional Conduct and disciplinary architecture.
- No current conflict of interest with the NBA, NBA-AMLC, LPDC, Body of Benchers, African Center, or FCDO.

4.2 Desirable Attributes

- Prior experience with comparator AML/CFT sanctions or disciplinary regimes for legal professionals in other FATF member or FATF-style regional body jurisdictions.
- Familiarity with the NBA's Rules of Professional Conduct 2023, the Legal Practitioners Act, and the operations of the LPDC and Body of Benchers.
- Experience facilitating consensus-building engagements with senior legal, disciplinary or regulatory bodies.
- Prior work with or for FCDO, EU, GIZ, UNODC, GIABA, or equivalent international development partners on legal sector governance or AML/CFT assignments.

SECTION 5: APPLICATION REQUIREMENTS

All applications must be submitted in English and must include the following documents in a single consolidated PDF or ZIP package:

5.1 Technical Proposal

- Cover letter (maximum two pages) confirming understanding of the assignment and the applicant's suitability;
- Organisational profile or consultant CV (maximum 3 pages);
- Technical approach and methodology, including proposed structure of the guidelines, manuals, and tools, and approach to stakeholder engagement;

Supporting Documents

- Copy of certificate of incorporation or professional registration (for firms and organisations), or current practising certificate (for individual consultants).
- At least one (1) sample of a similar deliverable previously produced (e.g., a disciplinary code, sanctions framework, or enforcement procedures manual), duly redacted if confidential.

5.2 Financial Proposal

Applicants must submit a Financial Proposal as a separate, clearly labelled document within the consolidated application package, to allow it to be reviewed independently of the Technical Proposal. The Financial Proposal must include:

- Proposed daily professional fee rate(s), quoted in Nigerian Naira (NGN);

- Total proposed professional fees, calculated against the level of effort of twenty-five (25) billable days set out in Section 7.2, with the proposed allocation of days mapped to the five assignment phases;
- Any anticipated reimbursable costs (e.g., travel or logistics associated with stakeholder validation sessions), itemised and clearly separated from professional fees, and consistent with African Center’s standard reimbursement policy;
- A statement confirming whether the proposed fees are inclusive or exclusive of applicable taxes and statutory deductions.

The Financial Proposal is not scored under the evaluation criteria set out in Section 6.1. Applications will be evaluated on technical merit only; African Center will review the Financial Proposal of the highest-ranked, technically qualified applicant(s) prior to contract negotiation and award.

6.1 Evaluation Criteria

Evaluation Criterion	Weight (%)	Description
Technical Competence & Relevant Legal Expertise	40	Demonstrated expertise in professional disciplinary law, legal ethics, AML/CFT regulation, and sanctions/enforcement framework design.
Methodological Approach	25	Quality and feasibility of the proposed approach to drafting, comparative analysis, and stakeholder engagement with LPDC and Body of Benchers.
Understanding of Context	25	Demonstrated understanding of the Rules of Professional Conduct 2023, NBA disciplinary architecture, and Nigeria's AML/CFT obligations for legal practitioners.
Qualifications of Key Personnel	10	Academic and professional credentials and disciplinary/regulatory law experience of proposed team members.
TOTAL	100	

SECTION 7: DURATION AND LEVEL OF EFFORT

7.1 Duration

The assignment shall be implemented over a period of up to three (3) months, i.e. twelve (12) weeks, from the date of contract signing, in accordance with the phased timeline set out in Section 3.6 above.

7.2 Level of Effort

The total level of effort (LOE) for this assignment shall not exceed twenty-five (25) billable days. This is not a continuous, full-time engagement: the assignment duration of up to three (3) months

reflects the calendar period required for phased drafting, comparator research, drafting team engagement, and stakeholder validation, while the 25 billable days reflect the actual paid input expected of the consultant. Billable days are to be deployed intermittently across the assignment period, scheduled by mutual agreement between the consultant and African Center based on the workplan confirmed in the Inception Report.

The indicative distribution of the 40 billable days across the five phases of the assignment is as follows:

Phase	Description	Indicative LOE (days)
Phase 1	Inception, Review, and Drafting Team Engagement (Weeks 1–2)	3
Phase 2	Comparative Analysis and Gap Assessment (Weeks 3–4)	5
Phase 3	Drafting of the Sanctions Framework (Weeks 5–7)	5
Phase 4	Stakeholder Validation (Weeks 8–9)	4
Phase 5	Revision, Enforcement Procedures, and Finalisation (Weeks 10–12)	8
TOTAL		25

This distribution is indicative. African Center may approve adjustments to the allocation of days across phases, provided the total LOE of twenty-five (25) billable days is not exceeded without prior written agreement. Applicants should reflect this level of effort, and their proposed daily fee rate, in their financial proposal.

Any request to extend the assignment duration or to increase the total level of effort shall require prior written approval from African Center.

SECTION 9: SUBMISSION INSTRUCTION

Complete application packages (technical proposal and supporting documents) must be submitted electronically to:

info@africancenterdev.org — Subject line: “RFA/OBJ2/ACT5/2026”

Application Deadline: 14th July 2026.

Applications submitted after the stated deadline will not be considered. Only shortlisted applicants will be contacted.