



Request for Applications (RFA)

Senior Experts – Strategic Risk Assessment of Corruption and AML/CFT/CPF Vulnerabilities in the Nigerian Judiciary

1. Background

Illicit financial flows (IFF), including money laundering (ML), terrorist financing (TF), and proliferation financing (PF), pose significant threats to global and national financial systems. In Africa, these challenges, which are often driven by corruption, cybercrime, organized crime, and human trafficking drain an estimated \$150 billion annually. Such losses undermine sustainable development, weaken public institutions, and entrench poverty. Corruption in the justice system in particular (whether actual or perceived) poses a real threat to confidence in the rule of law, as it enables criminals to evade accountability and perpetuates illicit flows. These losses undermine sustainable development, weaken institutions, and entrench poverty.

Nigeria is particularly vulnerable, with its judiciary exposed to risks of internal corruption and ML. Judiciaries worldwide are frequently identified among the sectors most prone to corruption, yet past reform efforts focused mainly on judicial independence and ethics while paying relatively little attention to corruption within the judiciary. International standards underscore that an effective judiciary is crucial to combating corruption and must itself remain free of corruption, with judges acting with integrity. In practice, however, Nigeria continues to face shortcomings in judicial accountability and enforcement. In the World Justice Project (WJP) Rule of Law Index 2019, Nigeria ranked 106th of 126 countries on composite indicators covering, inter alia, regulatory enforcement, civil and criminal justice and access to justice (WJP, 2019; GIABA, 2021). More recently, the WJP 2024 edition places Nigeria 120th of 142, underscoring persistent weaknesses. Despite growing concerns, dedicated anti-corruption initiatives in the judicial sector have been limited, resulting in gaps in sector-specific risk assessments and integrity strategies. This seeks to address that gap by assessing corruption and ML risks in Nigeria's judiciary. The outcome will be evidence-based policy recommendations aligned with FATF standards to strengthen judicial integrity and effectiveness.

A 2020 survey by Nigeria's Independent Corrupt Practices Commission (ICPC) found that the justice sector had the highest level of corruption among all sectors, with a corruption score of 63 (on a 0-100 index), higher than the executive, legislative, or private sectors. The ICPC noted this was driven by "stupendously high" bribes offered to judges by lawyers to influence case outcomes. In total, the pilot survey estimated over ₦9.4 billion (about \$23 million) in cash bribes were paid in the justice sector within the survey period. Likewise, the National Bureau of Statistics (NBS), UNODC Corruption in Nigeria survey (third edition, published 2024) revealed that while bribery is slightly declining in frequency, it remains pervasive: an estimated 87 million bribes were paid in Nigeria in 2023 alone. Notably, the judiciary accounted for some of the largest bribes. Judges and magistrates



received the highest average kickbacks of any public officials, despite citizens having relatively infrequent direct interactions with them. This indicates that when people do engage with the courts (often for high-stakes cases), corruption tends to be extremely costly. Such findings reinforce concerns that the judicial process in Nigeria is vulnerable to undue influence, undermining citizens' access to fair and impartial justice.

Despite this progress, critical gaps remain that are directly relevant to the judiciary's risk profile. GIABA's 2024 review found Nigeria still only "Partially Compliant" with several FATF Recommendations tied to corruption and the legal sector, notably: Recommendation 22 on DNFBPs' customer due diligence, Recommendation 23 on DNFBPs' suspicious transaction reporting, and Recommendation 12 on Politically Exposed Persons (PEPs). In practice, this means certain preventive measures are not yet fully in force or effective for those who might abuse the judicial process. For example, there remain loopholes in coverage of legal professionals under AML obligations, Nigerian law does not yet comprehensively require lawyers to conduct due diligence or report suspicious transactions when merely "preparing or carrying out" transactions on a client's behalf. Some practitioners may still invoke attorney-client privilege or simply lack awareness, resulting in under-reporting of suspicious activities involving court cases or client funds. Additionally, Nigeria's definition of PEPs has until recently lacked inclusion of close associates and family members. This gap can allow corrupt elites to use relatives or cronies (including possibly those in the judicial sphere or connected to judicial officers) to hide assets. In essence, while Nigeria's legal reforms have been robust on paper, effective implementation and coverage remain a concern, especially in sectors entwined with the judiciary. GIABA has kept Nigeria in an "Enhanced Follow-Up" process partly due to these effectiveness issues, indicating that more work is needed to translate laws into results.

Despite these growing concerns, anti-corruption reforms targeting the Nigerian judiciary have lagged behind those in other sectors. Past government initiatives have focused on executive-branch corruption (for instance, creating anti-graft agencies like the EFCC and ICPC) and on preventive measures in banks and other financial institutions, with comparatively limited attention to the judiciary's internal vulnerabilities. There is a clear gap in risk assessment and integrity strategies tailored to the justice sector. To date, no comprehensive assessment had been done of corruption and money laundering risks specific to Nigerian courts, even though analogous assessments exist for other sectors, such as Nigeria's National Risk Assessment covered banks, real estate, etc., but not in detail the judiciary. This concept note seeks to fill that gap by evaluating how corruption and ML risks manifest in judicial processes (such as case fixing, bribery for judgments, abuse of judicial discretion, and illicit financial dealings by court officials). By doing so, it will provide an evidence base for reforms. The outcomes will align with international standards, notably FATF Recommendations and UNCAC Article 11, and will support Nigeria's broader governance objectives such as strengthening the rule of law and improving its rankings in indices like Mo Ibrahim's African Governance Index and the World Justice Project Rule of Law Index (where Nigeria ranked 121st of 139 countries in 2021, reflecting weak performance in judicial accountability).

2. Objectives of the Assignment



The Senior Experts will:

- Provide technical expertise in law, governance, AML/CFT/CPF, and judicial integrity.
- Guide the assessment process to ensure methodological rigor.
- Produce actionable recommendations for strengthening the integrity and resilience of the Nigerian judiciary.

3. Scope of Work

The Senior Experts will work closely with the African Centre, CDD, and the National Judicial Institute (NJI) to:

- **Phase 1: Preparation & Pre-Assessment Workshop**
 - Contribute to project inception meeting and stakeholder mapping.
 - Review existing documentation (laws, judicial policies, codes of conduct).
 - Support design of workshop agenda, methodology, and stakeholder templates.
 - Facilitate sessions at the pre-assessment workshop and refine approach based on feedback.
- **Phase 2: Risk Assessment Implementation**
 - Provide expert input into legal and regulatory framework analysis.
 - Conduct/document policy and procedure reviews (judicial appointments, procurement, financial management, asset declaration, disciplinary procedures).
 - Guide stakeholder interviews (judicial officers, regulators, lawyers, litigants).
 - Support vulnerability assessment of high-risk case types (e.g., electoral tribunals, financial crimes).
- **Phase 3: Analysis & Report Development**
 - Lead consolidation of data and analysis of findings.
 - Develop risk assessment matrix, prioritization, and mitigation strategies.
 - Draft sections of the assessment report and formulate practical, implementable recommendations.
- **Phase 4: Validation & Finalization**
 - Present findings during the validation workshop.
 - Incorporate stakeholder feedback into the final report and policy brief.
 - Provide peer review and quality assurance of deliverables.

4. Deliverables

- Reviewed and validated risk assessment methodology and tools.
- Technical notes from fieldwork and interviews.



- Inputs into draft and final risk assessment report.
- Contributions to policy brief and public communication strategy.
- Workshop/validation facilitation reports.

5. Duration and Level of Effort

- **Timeline:** September – December 2025
- **Level of Effort:** 5 working days per Senior Expert (spread across the project timeline).

6. Qualifications of Senior Experts

Applicants must meet the following requirements:

- Advanced degree (Master's or higher) in Law, Public Policy, Governance, Criminology, Political Science, or related fields.
- 10-15 years of professional experience in governance, anti-corruption, asset recovery, AML/CFT/CPF, or judicial reform.
- Proven experience conducting institutional risk assessments, integrity assessments, or sector reviews.
- Familiarity with Nigeria's judicial system and related anti-corruption/AML bodies (EFCC, NFIU, ICPC, NJC, etc.).
- Strong analytical, report-writing, and presentation skills.
- Demonstrated facilitation and stakeholder engagement experience.

7. Reporting and Supervision

The Senior Experts will report to the **Project Director** at the African Center and work closely with CDD and NJI.

8. Application Process

Interested applicants are invited to submit the following:

1. **Cover letter** highlighting relevant experience and availability.
2. **Curriculum Vitae (CV)** detailing qualifications and previous assignments.



3. **Technical proposal** (max. 3 pages) outlining how you would approach the assignment.
4. **Financial proposal** indicating daily consultancy rate.

9. Submission Details

- Applications should be sent by email to: **info@africancenterdev.org**
- Subject line: *Application – Senior Expert, Judicial Risk Assessment*
- Deadline: 11 September 2025

10. Contact Information

All inquiries should be directed to:

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