

Request for Application (RFA) from consultants

Call Title: Assessment of the Implementation of Proceeds of Crime (Recovery and Management) Act, 2022, in Nigeria

Organization: Africa Network for Environment and Economic Justice (ANEEJ)

Project Title: Tackling Illicit Financial Flows (IFFs) through Asset Recovery and Management and Countering Money Laundering/Counter Terrorism Financing/Proliferation Financing (ML/CFT/PF) in Nigeria

Funding Partner: FCDO

Issue Date: 12 January 2026

Closing Date: 26 January 2026

Contact Email: procurement@aneej.org

Background

Nigeria enacted the Proceeds of Crime (Recovery and Management) Act (POCA), 2022 to establish a comprehensive legal framework for the identification, tracing, seizure, confiscation, management, and disposal of proceeds of crime. The Act provides for enhanced coordination among designated Anti-Corruption Agencies (ACAs) and other relevant institutions in the recovery and management of recovered assets.

To operationalise the Act, the Federal Government issued the Proceeds of Crime (Recovery and Management) Regulations, 2024, which provide detailed procedures for asset recovery, reporting, inter-agency collaboration, asset management, and data entry into the central database.

Despite these legal and institutional advances, effective implementation remains uneven, with varying levels of compliance, coordination, and capacity among ACAs and other relevant institutions. Assessing the implementation at this time is therefore critical to identifying gaps, strengthening compliance, improving inter-agency coordination, and ensuring that recovered assets are transparently managed and utilised in line with the law.

Against this background, ANEEJ seeks to engage a qualified consultant to assess the implementation of POCA 2022 in Nigeria from date of enactment to date.

Objectives of the Consultancy

Overall Objective

To assess and document the level of implementation of the Proceeds of Crime (Recovery and Management) Act, 2022 in Nigeria by designated relevant institutions with a view to strengthening compliance, transparency, and accountability.

Specific Objectives

1. Assess institutional compliance with the provisions of POCA 2022 by designated ACAs.

2. Examine the extent of implementation of the POCA Regulations 2024, including operational guidelines and reporting requirements.
3. Examine the functionality, accessibility, and utilisation of the Central Database of Recovered Assets by ACAs and other relevant institutions listed under POCA.
4. Identify legal, institutional, technical, and capacity gaps affecting implementation.
5. Generate evidence-based recommendations to improve coordination, reporting, and asset management practices.

3. Scope of Work/ToR

The consultant shall undertake the following tasks:

A. Legal and Institutional Review

- Review the provisions of POCA 2022 and the POCA Regulations 2024.
- Map the statutory roles and responsibilities of ACAs designated under POCA.
- Assess alignment between legal provisions and current institutional practices.

B. Assessment of POCA Implementation

- Assess compliance by ACAs with POCA provisions on asset tracing, seizure, forfeiture, management, and disposal.
- Examine inter-agency cooperation and information-sharing mechanisms.
- Review reporting obligations and accountability measures.
- Assess awareness and application of POCA Regulations 2024 by relevant institutions.
- Review standard operating procedures, guidelines, and internal processes developed pursuant to the Regulations.
- Identify implementation bottlenecks and best practices.
- Evaluate the level of usage of the central database by relevant institution listed under POCA.
- Assess data quality, timeliness, completeness, and consistency of entries.
- Identify technical, legal, and operational challenges affecting effective use of the database.
- Review access controls, data security, and reporting functionalities.

E. Stakeholder Engagement

- Conduct key informant interviews with relevant ACAs, the Asset Recovery and Management Unit (ARMU), and other stakeholders.
- Engage civil society and oversight institutions where relevant.

F. Reporting and Recommendations

- Develop practical recommendations to strengthen implementation, coordination, and transparency.
- Propose measures for improving compliance and effective use of the central database.

4. Key Deliverables

The consultant is expected to deliver:

1. Inception Report – outlining methodology, workplan and timeline
2. Assessment Tool (to be shared with ANEEJ for feedback)
3. Draft Assessment Report covering overview of the implementation of POCA 2022 including the implementation of POCA Regulations 2024 and the use of the Central Database of Recovered Assets
4. Present the report at a stakeholders' meeting for validation and discussion and use the feedback from stakeholders to review the report – the date of the meeting will be scheduled by ANEEJ and made known to the consultant
5. Final Assessment Report, incorporating stakeholder feedback and actionable recommendations containing executive Summary for policymakers and stakeholders.

5. Duration of Assignment

The consultancy will last for 20 days from the date of contract signing.

6. Reporting and Supervision

The consultant will report to ANEEJ and work closely with designated focal persons. All deliverables shall be submitted to ANEEJ for review and approval.

7. Required Qualifications and Experience

- At least first degree in law, criminology, public policy, governance, or related fields.
- Demonstrated expertise in asset recovery, anti-corruption, financial crimes, or criminal justice reform.
- Proven experience in monitoring and evaluation, legal or institutional assessments.
- Strong understanding of Nigeria's anti-corruption architecture and POCA framework.
- Excellent analytical, writing, and communication skills.

8. Application Process

Interested individuals or firms/organisations are required to submit the following:

- Brief technical proposal (including methodology, work plan, and team composition if more than one person will be involved)
- Financial Proposal (breakdown of professional fees and costs)

- Curriculum Vitae (CV) of the researcher (for individual) or 2 persons who will be involved in the research (for firm/organisation)
- Evidence of previous similar work done

10.Ethics and Conflict of Interest

Applicants must declare any potential or actual conflict of interest in relation to this assignment. ANEEJ reserves the right to disqualify any applicant found to be in conflict or engaged in unethical practices.

11.Data Protection and Ownership

All data collected during the assignment shall be the property of ANEEJ. The consultant must ensure confidentiality and compliance with data protection regulations, including the Nigeria Data Protection Regulation (NDPR 2019) and, where applicable, the FCDO Data Protection Regulation. All personal and sensitive data collected shall be securely stored and used only for the purpose of this assignment, in line with informed consent protocols and the consortium's data protection standards.

1. Submission Deadline

All proposals must be submitted by 5:00pm January 26, 2026 to:

Africa Network for Environment and Economic Justice (ANEEJ)

Email: procurement@aneej.org All document must be submitted in pdf format

Subject for email submission should be: "Research on the enablers of IFFs in the extractive sector"