

## **Request for Application**

### **Terms of Reference (ToR)**

#### **Technical Consultant – Asset Recovery and Management**

**Project:** Tackling Illicit Financial Flows (IFFs) through Asset Recovery and Management and Countering Money Laundering, Terrorism Financing and Proliferation Financing in Nigeria.

**Duration:** July 2026 – April 2027 (10 months).

**Location:** Nigeria.

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

#### **Background**

Nigeria enacted the Proceeds of Crime (Recovery and Management) Act (POCA), 2022 backed by 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. Four years later, challenges persist with the effective implementation of the POCA. Some of the Relevant Organizations have never drawn from the POCA in their Asset recovery and management mandate and some even continue to work in isolation. Amongst other factors, the lack of compliance and coordination has been blamed on the lack of capacity and proper understanding of the POCA; being a relatively new legal framework.

It is against this backdrop that ANEEJ, under the *Tackling Illicit Financial Flows (IFFs) through Asset Recovery and Management and Countering Money Laundering, Terrorism Financing and Proliferation Financing in Nigeria* project, is seeking to engage a Technical Consultant to work with the Asset Recovery and Management Unit (ARMU) to provide technical expertise, data analysis, and monitoring of Nigeria's asset recovery framework in line with international standards, particularly the new FATF Guidance, GFAR Principles, UNCAC obligations, and the UK Anti-Corruption Strategy 2026. This task mandate directly aligns with the project objective which is to strengthen Nigeria's response to Illicit Financial Flows (IFFs) through enhanced implementation of the Asset Recovery and Management Framework and improved legal sector AML/CFT compliance.

The project is funded by the Foreign, Commonwealth & Development Office (FCDO) of the United Kingdom.

#### **Objectives of the Assignment**

The overall objective is to strengthen ARMU's capacity to analyze, monitor, and report on asset recovery and management in Nigeria. Specifically, the consultant will:

- I. Support ARMU in conducting quarterly analysis of asset recovery data and corruption/crime trends.

- II. Monitor the implementation of Nigeria's Asset Recovery Framework and assess compliance with FATF Guidance.
- III. Provide comparative analysis of FATF Guidance versus Nigeria's framework, identifying gaps and recommending solutions.
- IV. Generate quarterly and final reports to inform policy responses and strengthen Nigeria's asset recovery system.

## Scope of Work

The consultant will undertake the following tasks:

- I. **Data Analysis:** Conduct quarterly analysis of the Asset Recovery and Management Central Database, focusing on corruption issues, crime patterns, asset recovery trends, and typologies.
- II. **Monitoring:** Track the implementation of Nigeria's Asset Recovery Framework and assess how Reporting Organizations (ROs) provide information and analysis to the Central Database.
- III. **Comparative Review:** Analyze the new FATF Guidance on asset recovery and compare it with Nigeria's existing framework to identify gaps.
- IV. **Reporting:** Produce quarterly reports and a final comprehensive report with recommendations for bridging identified gaps.
- V. **Capacity Support:** Provide technical input to strengthen ARMU's manpower and analytical capacity.

## Deliverables

- I. **Quarterly Reports (4):** Analytical reports on asset recovery data, corruption trends, and crime typologies.
- II. **Monitoring Report:** Assessment of Nigeria's Asset Recovery Framework implementation and FATF compliance.
- III. **Comparative Analysis Report:** Detailed gap analysis between FATF Guidance and Nigeria's framework with recommendations.
- IV. **Final Comprehensive Report:** Consolidated findings and recommendations for strengthening Nigeria's asset recovery and management system.

## Duration and Timeline

- **Period:** 10 months (July 2026 – April 2027).
- **Reporting Frequency:** Quarterly reports plus final comprehensive report at the end of the assignment.

## Consultant Qualifications

- Advanced degree in Law, Economics, Criminology, Public Policy, or related field.

- Minimum 7 years of experience in asset recovery, anti-corruption, AML/CFT compliance, or financial crime analysis.
- Strong knowledge of FATF standards and guidance.
- Experience working with government institutions, international organizations, or civil society on asset recovery and financial crime.
- Excellent analytical, writing, and communication skills.

### **Reporting and Supervision**

The consultant will report directly to ANEEJ's Project Director and work closely with the Asset Recovery and Management Unit (ARMU).

### **Application Process**

Interested consultants should submit:

1. **Technical Proposal** (understanding of assignment, methodology, work plan).
2. **Financial Proposal** (consultancy fees and any other costs).
3. **CV** highlighting relevant experience.
4. At least **two samples of previous analytical reports** or publications.

### **Selection Criteria**

- I. Relevant expertise and qualifications (30%)
- II. Quality of technical proposal (30%)
- III. Financial competitiveness (20%)
- IV. Demonstrated experience with similar assignments (20%)

### **Submission Details**

- Deadline: **24th July 2026**
- Email applications to: **procurement@aneej.org**
- Subject line: ***"Proposal – Technical Consultant on Asset Recovery and Management"***