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The Role of Non-Governmental Organisations (NGOs) in Anti-Corruption and the Manifest Challenges in their Operations

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Abstract

This paper discussed the role of NGOs in combating corruption and highlighted the challenges faced by these NGOs in this efforts. Non-governmental organizations (NGOs) serve as critical watchdogs in Nigeria's fight against corruption, complementing institutions like the Economic and Financial Crimes Commission (EFCC) and Independent Corrupt Practices Commission (ICPC). The problem addressed in this paper is that despite operating under key legal frameworks such as the Freedom of Information Act 2011, EFCC Act 2004, and Companies and Allied Matters Act 2020, NGOs like BudgIT, CLEEN Foundation, Public and Private Development Centre (PPDC), and Partners West Africa Nigeria (PWAN) encounter severe challenges in the struggle against the scourge of corruption. Adopting the doctrinal method, which relies on both primary and secondary sources, the paper evaluated NGOs' roles in advancing anti-corruption efforts aligned with the United Nations Convention Against Corruption (UNCAC) pillars: prevention, criminalization, international cooperation, asset recovery, and technical assistance as well as Nigeria's 1999 Constitution and Sustainable Development Goal 16. The paper found that amid governmental shortcomings and barriers, NGOs provide indispensable contributions by driving key anti-corruption activities such as public awareness advocacy, budget monitoring, investigative support, transparency promotion, agency partnerships, and institutional accountability. It concluded that strengthening NGOs is essential for transparency, justice, and development in Nigeria, recommending sustainable funding mechanisms, legal safeguards for independence and whistleblowers, capacity-building programs, and multi-stakeholder networks to overcome hurdles and amplify their watchdog role.

Keywords: Non-governmental organisations, anti-corruption, accountability, EFCC, Nigeria

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1. Introduction

In Nigeria, where corruption erodes economic progress, public trust, and social justice costing billions annually non-governmental organizations (NGOs) serve as indispensable watchdogs, filling institutional gaps left by bodies like the Economic and Financial Crimes Commission (EFCC) and Independent Corrupt Practices Commission (ICPC) (EFCC, 2004; ICPC, 2000). Operating independently as non-profit entities under frameworks such as the Companies and Allied Matters Act (CAMA) 2020 and the Freedom of Information Act 2011, NGOs like BudgIT, CLEEN Foundation, Public and Private Development Centre (PPDC), and Partners West Africa Nigeria (PWAN) drive advocacy, budget monitoring, investigative support, and partnerships aligned with the United Nations Convention Against Corruption (UNCAC; United Nations, 2003). These efforts advance 2015 UN Sustainable Development Goal (SDG) 16 targets on reducing bribery building accountable institutions, and ensuring access to information.. Yet, as some scholars note, "manifest challenges" persist, including funding shortages, urban bias, skill gaps, regulatory hurdles under SCUML, government interference, and weak whistle-blower protections.¹ This article examines NGOs' pivotal roles in anti-corruption while interrogating these barriers, proposing reforms to amplify their impact toward transparent governance in Nigeria.

2. Conceptual Clarifications

2.1 Non-governmental organizations (NGOs)

Non-governmental organizations (NGOs) are entities that operate independently of government control, often functioning as non-profit organizations focused on addressing social, humanitarian, environmental, or development issues. NGOs can be local, national, or international and may receive funding from various sources, including private donations, government grants, or international institutions (subject to national laws), though they remain organizationally distinct from governments.

The term "NGO" was formalized in the United Nations Charter of 1945, defining these groups as voluntary citizen organizations working for the public good. NGOs vary widely in their activities they may provide direct services, operational support, or engage in advocacy to influence public policies and raise awareness on specific causes such as human rights or environmental protection. They play vital roles in anti-corruption, disaster relief, development projects, political advocacy, and in representing citizens' interests at local and global levels.

Non-governmental organizations (NGOs) play a pivotal role in Nigeria's anti-corruption efforts by filling gaps left by government institutions through advocacy, monitoring, and public education. These NGOs collaborate with bodies like the Economic and Financial Crimes Commission (EFCC) and Independent Corrupt Practices Commission (ICPC) while leveraging legal frameworks to promote transparency.² The examples of these NGOs are the BudgIT, the Centre for Law Enforcement Education (CLEEN) Foundation, the Public and Private Development Centre (PPDC), and Partners West Africa Nigeria (PWAN).

¹ M Ali. 'Empowerment of Anti-Corruption NGOs', *International Journal of Business, Economics and Law*, (2017) 14(4); 122-123. and I.B Shatambaya, 'Civil Society Organizations (CSOs) and Anti-Corruption in Nigeria: Pathways for Improvement', Being a Conference Paper Presented at the Academic Staff Union of Universities (ASUU) Conference on the Theme Nigeria in a State of General Crisis: The Search for a New Path to Development Held from the 2nd to the 6th of October, 2024 1-22.

² Partners Global, 'Civil Society for Anti-Corruption in Nigeria', <<https://www.partnersglobal.org/resources/civil-society-for-anti-corruption-in-nigeria/>>, accessed 09 February, 2026.

There is no commonly agreed-upon definition of NGOs, and the lack of a definition as hindering the understanding of the functioning of NGOs.³ The U.N., however, provides a workable definition that sets out some of their key characteristics as follows: A not-for-profit, voluntary citizens' group, which is organized on a local, national or international level to address issues in support of the public good. Task-oriented and made up of people with a common interest, NGOs perform a variety of services and humanitarian functions, bring citizens' concerns to Governments, monitor policies and programme implementation, and encourage political participation of civil society stakeholders at the community level. They provide analysis and expertise, serve as early warning mechanisms and help monitor and implement international agreements.⁴

Rani Parker's classification of NGOs reflects these key characteristics.⁵ There is no generally accepted definition of NGOs. Vakil feels that the absence of a definition is a barrier to the understanding of the functioning of NGOs. Based on this categorization, NGOs can be classified into three categories: the operational NGO (ONGO), the advocacy NGO (ANGO), and the hybrid NGO (HNGO). Operational NGOs are perhaps the oldest type of NGOs, which deliver necessary services during critical periods, like humanitarian disasters and conflict, and the prime example of this is the Red Cross. Parker compares Operational NGOs to multinational enterprises (MNEs) as both possess expert knowledge on how to enter a country, possess knowledge of cultures and conditions on the ground, and have huge financial budgets to monitor. Operational NGOs are also apolitical. Advocacy NGOs, on the other hand, are politics and ideology-driven (like democratic engagement, freedom of speech, and poverty alleviation) and employ confrontational strategies (like writing scathing reports on the state's record on human rights, the performance of multinational corporations, and the exploitation of the labor force) that help in mobilizing support at the grassroots level to facilitate policy changes.⁶

They, in general, take the moral high ground and try to effect change through tighter regulation, enforcement, and changes in institutional practices through naming and shaming. The Hybrid NGOs are hybrids, which display traits of both Operational NGOs and Advocacy NGOs but also have "a high degree of sophistication among them with respect to MNEs... They recognise the vast range of possibilities and the diversity among MNEs, and tend to hold fairly sophisticated perspectives on the complexities of NGO-MNE relationships."⁷

Although the anti-corruption conventions have in mind the role of NGOs in raising public awareness and preventing and fighting corruption, they do not specify how these activities can be accomplished in order to have the maximum effect. This is quite understandable, since NGOs lack uniformity in characteristics such as size, geographical location, awareness of conditions on the ground, level of expertise, and, more importantly, the level of freedom and the nature of activities that are allowed in the country of operation. Thus, the methods and means that are

³ Anna C. Vakil, 'Confronting the Classification Problem: Toward a Taxonomy of NGOs', (1997) 25 *World Dev.* 2057, 2057 in: Indira Carr1 & Opi Outhwaite, 'The Role of NGOs in Combating Corruption', (2011) XLIV(3), *Suffolk University Law Review*, 620.

⁴ John Boli, *International Nongovernmental Organizations in The Nonprofit Sector: A Research Handbook* (Walter W. Powell & Richard Steinberg eds., 2d ed. 2006), 333, 335.

⁵ A. Rani Parker, 'Prospects for NGO Collaboration with Multinational Enterprises', in Jonathan P. Doh & Hildy Teegen (eds.) *Globalization and NGOs: Transforming Business, Government, and Society*, (2003) 81.

⁶ Indira Carr1 & Opi Outhwaite, (n 3) 621.

⁷ *Ibid.*, 620-621.

applicable in one country may not be applicable in another, where the activities of the NGO are severely limited by the local laws and other factors.⁸

2.2 Meaning of Corruption

The term corruption is a dynamic concept that is susceptible to several definitions. Wang Huning and Huang Bai Lian defines corruption as non-public use of public power (abuse and unfair exchange). Most scholars believe that corruption is the only government official acts of abuse of power.⁹ They assume from this concept that corruption includes the subject of corruption, motivation (purpose), means, the way and the consequences and puts the negative corruption into the scope of corruption. He particularly points out that a lot of corruption is hiding under the cloak of acts of abuse of power with violation of the established codes of ethics.¹⁰

According to the Black's Law Dictionary, corruption means depravity, perversion, or taint; an impairment of integrity, virtue, or moral principles, especially the impairment of public officials' duties by bribery. The act of doing something with an intent to give some advantage inconsistent with official duty and the rights of others; a fiduciary's or official's use of a station or office to procure some benefits either personally or for someone else, contrary to the rights of others.¹¹

Corruption is often described as "the abuse of public office for personal gain". In my view, although this description was pertinent to the early stage of the fight against corruption, it is now not commensurate with the evolution of corruption and what has been learnt in the last two decades about corruption. corruption do not only encompass the abuse of public office, but they also embrace the abuse of power and influence, be it the power and influence vested in a person by virtue of holding a political position, holding a position of great influence in a company, holding personal wealth and resources, or holding a position of high social status.¹²

Corruption, however, not only results in personal gains but also benefits a group of people, such as a political party or a corporation. Similarly, the word "Gain" should not only be associated with financial gains but also explicitly include non-financial benefits, especially those related to increased power and influence for an individual or organisation. It is important to note that corruption does not solely involve monetary aspects like bribery; it also encompasses a wide range of behaviours, such as conflicts of interest, patronage, nepotism, embezzlement, influence peddling, or even manipulating legislative processes for ulterior corrupt purposes. Moreover, this list is not exhaustive and can be expanded. Corruption is not just about actions and their immediate or direct consequences; rather, it increasingly relates to a long-term strategy, especially when it involves gaining access to, maintaining power and influence, or expanding geopolitical reach.¹³

According to Transparency International, corruption is "the abuse of entrusted power for private gain". Corruption undermines trust, undermines democracy, impedes development, and even

⁸ *Ibid.*

⁹ Li, Y.L., Wu, S.J. and Hu, Y.M. 'A Review of Anti-Corruption Studies in Recent China', (2011) 11 *Chinese Public Administration*, 115-119.

¹⁰ Z.K He, 'Research in the Issues of Corruption and Combating Corruption during Chinese Transition', (2003) 1 *Comparative Economic & Social Systems*, 19-29.

¹¹ B.A. Garner (ed), *Black's Law Dictionary*, (7th edn West Group St. Paul, MINN, 2000) 281.

¹² Basel Institute of Governance, "What is Corruption", <http://baselgovernance.org/what-is-corruption#:~:text=Corruption%20is%20commonly%20defined%20as%20the%20abuse,A%20corporation%20*%20A%20group%20of%20people> accessed 11 November 2025

¹³ *Ibid.*

fuels inequality, poverty, social division, and the ecological crisis. Corruption assumes many forms, and it encompasses situations such as public officials who ask for money or favours in exchange for services, public officials who misuse public funds or give public jobs or contracts to their patrons, friends, and family, and situations in which corporations bribe public officials to secure rich contracts.¹⁴ Corruption can occur anywhere, in business, in the government, in the judiciary, in the media, and in civil society, and in all sectors, ranging from health and education to infrastructure and sports. Corruption can occur anywhere, and it can occur with anyone, whether it is in the government, in the judiciary, in the media, in business, and in civil society. Corruption occurs in the shadows, with the help of professional enablers, ranging from bankers and lawyers to accountants and real estate agents, and with the help of opaque financial systems and anonymous shell companies, which allow corruption schemes to thrive and the corrupt to hide their ill-gotten gains, and it evolves and changes in response to changing circumstances, rules, and legislation, and even technology.¹⁵

Corruption is a formidable impediment to social and economic process. It undermines privileges of fairness and justice, erodes public trust, and perpetuates poverty. “Nigeria, like other nations, has grappled with the effects of corruption, and this culminated in efforts by successful administrations to face up to the challenge of redeeming the country’s image.”¹⁶

2.3 Anti-Corruption

The term anti-corruption describes a evolving field of policy and practice that seeks to reduce the incidence and harm of corruption in all its manifestations.¹⁷ Anti-corruption (or anticorruption) comprises activities that oppose or inhibit corruption. Just as corruption takes many forms, anti-corruption efforts vary in scope and in strategy.¹⁸ Anti-corruption refers to measures, policies, and practices implemented to prevent, detect, and address corruption, which involves unethical or illegal actions such as bribery, fraud, embezzlement, or abuse of power for personal gain. In business and governance, anti-corruption efforts are designed to ensure transparency, accountability, and compliance with ethical and legal standards.¹⁹

Anti-corruption is important because it promotes ethical behaviours, protects businesses from legal and reputational risks, and ensures fair competition. Corruption undermines trust, distorts markets, and can lead to financial losses, penalties, and damage to an organization's reputation.²⁰

¹⁴ Transparency International ‘What is Corruption’, CPI Corruption Perception Index, <https://www.transparency.org/en/what-is-corruption#:~:text=Transparency%20International%20defines%20corruption%20as%20the%20abuse,Health%20and%20education%20*%20Infrastructure%20*%20Sports> accessed 14 November 2025

¹⁵ *Ibid.*

¹⁶ Busola Aro, ‘BudgIT Seeks Strengthening of Anti-corruption Systems with New Project’, *The Cable*, 1st November, 2024.

¹⁷ CMI U4, ‘Anti-Corruption Resource Centre’, <<https://www.u4.no/topics/anti-corruption-basics/basics>> accessed 25 November, 2025.

¹⁸ J. Lehtinen,; G. Locatelli,; T. Sainati,; K. Arto,; B. Evans, ‘The grand challenge: Effective anti-corruption measures in projects’ (2022) 40(4) *International Journal of Project Management* 347–361.

¹⁹ Legal Glossary, “Anti-corruption: Overview, Definition and Example”, available at: <<https://www.cobrief.app/resources/legal-glossary/anti-corruption-overview-definition-and-example/>> 22 November, 2025.

²⁰ Cobrief, ‘Anti-corruption: Overview, definition and example’, 2024 <<https://www.cobrief.app/resources/legal-glossary/anti-corruption-overview-definition-and-example/>> accessed 23 November, 2025.

Generally, NGOs emerged as vital watchdogs amid weak enforcement, with the Freedom of Information Act 2011 enabling access to public records for accountability.²¹ Despite progress, challenges like agency independence persist, as noted in United Nations Convention Against Corruption (UNCAC) reviews.

It is important to state that the United Nations Convention against Corruption (UNCAC) is the only legally binding universal anti-corruption instrument, adopted in 2003 and entered into force since 2005. It provides a comprehensive framework to fight corruption across five key pillars: prevention, criminalization, international cooperation, asset recovery, and technical assistance. With 192 parties, it addresses various forms of corruption including bribery, embezzlement, and money laundering.²² Regional anti-corruption conventions also exist to complement the 2005 UNCAC. The AU Convention on Preventing and Combating Corruption (AUCPCC), adopted in 2003, aims to eradicate corruption across Africa's public and private sectors through comprehensive regional mechanisms. Its primary objectives, as outlined in Article 2, include promoting national mechanisms to prevent, detect, punish, and eradicate corruption; facilitating cooperation among State Parties for effective anti-corruption actions; harmonizing policies and legislation continent-wide; advancing socio-economic development by upholding rights; and fostering transparency and accountability in public affairs management. Article 12 of the AU Convention on Preventing and Combating Corruption (AUCPCC) addresses the engagement of civil society and the media in anti-corruption efforts. State Parties commit to fully involving civil society and media in combating corruption and promoting the Convention. They must foster an enabling environment for civil society and media to ensure government transparency and accountability in public affairs. Additionally, State Parties agree to include civil society in monitoring and implementation processes.²³

3. Theoretical Framework

Several key theories from corruption studies explain the role of NGOs in anti-corruption efforts and the challenges they encounter, such as monitoring deficits, systemic norms, and institutional barriers. These frameworks analytically highlight both NGOs' potential as watchdogs and their vulnerabilities like funding shortages and co-optation risks.²⁴

(a) Principal Agent Theory: NGOs act as monitors or supplementary principals to align corrupt agents (public officials) with public interests amid information asymmetries. They expose agency problems by advocating oversight, transparency, and incentives like audits, reducing officials' discretion for personal gain. However, challenges arise when NGOs lack enforcement power or face elite capture, limiting their ability to curb entrenched bureaucratic corruption effectively.²⁵

(b) Collective Action Theory: This theory posits corruption as a coordination failure where individuals rationalize bribes due to perceived norms, requiring multi-stakeholder alliances for

²¹ Freedom of Information Act, 2011.

²² UNODC, United Nations Convention Against Corruption (UNCAC), United Nations, New York, 2004 https://www.unodc.org/roseap/uploads/documents/Publications/2023/uncac/UNCAC_Factsheet_for_ASEAN_-_Overview.pdf accessed 02 February, 2026.

²³ African Union, 'African Union Convention on Preventing and Combating Corruption Adopted by the 2nd Ordinary Session of the Assembly of the Union Maputo, Mozambique 11th July 2003', Articles 2 and 12.

²⁴ "Empowerment of Anti-Corruption NGOs", <<https://ijbel.com/wp-content/uploads/2018/01/LAW-114-1.pdf>>, accessed 07 February, 2026.

²⁵ UNODC, United Nations Office on drugs and Crime, 'Theories that Explain Corruption', accessed 09 February, 2026 <<https://www.unodc.org/e4j/zh/anti-corruption/module-4/key-issues/theories-that-explain-corruption.html>>, accessed 11 February, 2026

reform. NGOs spearhead collective action by forming coalitions, mobilizing civil society, and fostering trust through awareness campaigns and pacts against collusion in procurement. Analytically, their role falters in high-corruption equilibrium without "principled principals," as donor-driven agendas or fragmented efforts undermine sustained collaboration, perpetuating impunity.²⁶

(c) Institutional Theory: Institutions shape corruption via rules, norms, and routines; NGOs challenge entrenched corrupt structures by pushing for accountability mechanisms and cultural shifts. They strengthen anti-corruption bodies through advocacy for independent agencies and transparency laws, addressing how weak rule of law embeds deviance. Challenges manifest when NGOs confront "bad barrels" like opaque political financing, where their external pressure is diluted by institutional inertia or backlash, especially in hybrid regimes.²⁷

(d) Game Theory: Public officials and firms navigate prisoner's dilemmas in corruption games, fearing disadvantage if others bribe; NGOs alter payoffs by raising detection risks and promoting ethical equilibrium. Through advocacy and public shaming, they shift rational calculations toward compliance in bidding or licensing. Yet, NGOs struggle against repeated games with low trust, where retaliation or resource asymmetry leaves them out-manoeuvred, highlighting the need for repeated interactions to build cooperation.²⁸

(e) Civil Society Theory: Civil society, via NGOs, fills governance gaps by monitoring, empowering citizens, and pressuring states per UNCAC Article 13, embodying pluralism against state capture. Analytically, they enable grassroots accountability and policy reform, countering elite dominance. Manifest challenges include funding dependence eroding independence, top-down donor priorities side-lining local needs, and risks like harassment in authoritarian contexts.²⁹

4. Corruption Landscape in Nigeria and the Role of NGOs in the Fight Against Corruption

Corruption undermines Nigeria's development, manifesting in bribery, embezzlement, and abuse of office, costing the economy billions of naira annually. Main legislation include the EFCC (Establishment) Act 2004, which empowers the EFCC to prevent, investigate, and prosecute economic crimes.³⁰ Similarly, the Corrupt Practices and Other Related Offences Act 2000 establishes the ICPC to handle complaints, review public systems, and educate against corruption.³¹

NGOs and Civil Society Organisations (CSOs) emerged as vital watchdogs amid weak enforcement, with the Freedom of Information Act 2011 enabling access to public records for

²⁶ Heather Marquette & Caryn Peiffer, 'Collective Action and Systemic Corruption', Paper presented at the ECPR Joint Sessions of Workshops, University of Warsaw 29 March to 2 April 2015, <<https://baselgovernance.org/sites/default/files/2019-02/collectiveactionandsystemiccorruption.pdf>> accessed 12 February, 2026.

²⁷ UNODC (n 25).

²⁸ Kendra Dupuy, 'Functionalist and Rational choice Theories of Corruption', CMI U4 Anti-Corruption Resource Centre, <<https://www.u4.no/functionalist-and-rational-choice-theories-of-corruption>> 13 February, 2026.

²⁹ UNODC, United Nations Office on drugs and Crime, 'The Role, Risks and Challenges of CSOs Fighting Corruption', UNODC Anti-Corruption Module 10 <<https://www.unodc.org/e4j/en/anti-corruption/module-10/key-issues/the-role--risks-and-challenges-of-csos-fighting-corruption.html>>, accessed 12 February, 2026.

³⁰ Economic and Financial Crimes Commission (EFCC) Act 2004, Section 6.

³¹ Independent Corrupt Practices Commission (ICPC) Act 2000, Section 6.

accountability.³² It is important to state that CSOs encompass a diverse array of Non-Governmental Organizations (NGOs), community groups, advocacy networks, and grassroots movements that operate outside the sphere of government and the market.³³

4.1 Legal Frameworks Empowering NGOs in Fight Against Corruption

Nigeria's laws indirectly bolster NGOs by mandating public reporting and protecting informants. ICPC Act Section 23 requires reporting bribery transactions, allowing NGOs to channel citizen complaints.³⁴ EFCC Act Section 39 safeguards informants, crucial for NGOs whistleblowing on financial crimes.³⁵

NGOs are organised as non-political, non-profit, and autonomous entities registered with the government of the country where they operate as incorporated trustees.³⁶ Registration gives them legal recognition and credibility and legitimacy in the eyes of donors, partners, and the communities they serve. The Companies and Allied Matters Act (CAMA) 2020 regulates NGO registration via the Corporate Affairs Commission, while the Special Control Unit Against Money Laundering (SCUML) mandates EFCC certification to curb money laundering in non-profits. Money Laundering (Prevention and Prohibition) Act 2022 further obliges NGOs to report suspicious transactions, aligning them with anti-corruption goals.³⁷ These provisions position NGOs as partners, not just observers, in enforcing the Criminal Code Act and Penal Code, which criminalize bribery.³⁸

4.2 Roles of NGOs in the Anti-Corruption Fight

Anti-corruption efforts rely on preventive measures, enforcement mechanisms, and institution building. NGOs can aid in all three of these activities in the fight against corruption. As part of civil society, NGOs can exercise pressure regarding policy change in the field of anticorruption. NGOs with interest in anti-corruption policies, can supply international development cooperation like donor agencies with country-specific knowledge with the desire to make issues of corruption a political one in the country where they operate.³⁹

NGOs have the potential to monitor of legal instruments, budgets, as well as government performance. By empowering the organizations to assume their roles as watchdogs, the sense of ownership of anti-corruption activities increases. Possible involvement of the NGOs in the realm of whistle-blowing: Providing citizens with opportunities to anonymously expose acts of corruption, for instance, through a telephone hotline. Finally, NGOs can assume the role of an advocate. Awareness of corruption and its effects can be created by such organizations through media campaigns, information centers, and websites.⁴⁰ NGOs engaged in anti-corruption are active in many areas, which include advocacy at various levels, education of constituencies,

³² Freedom of Information Act, 2011.

³³ P Raghav, 'The Role of Civil Society in Combating Political Corruption', (2024) *J Pol Sci Pub Aff*. 1-2.

³⁴ ICPC Act, 2000, Section 23.

³⁵ EFCC Act, 2004, Section 39.

³⁶ CAMA Act 2020, Section 823 (1) and (2).

³⁷ Taiwo Bankole, 'EFCC Warns NGOs against Terrorism Financing, Money Laundering', 29 August, 2025, <<https://punchng.com/efcc-warns-ngos-against-terrorism-financing-money-laundering/>>, accessed 10 February, 2026

³⁸ Example, Sections 98-115 of Criminal Code Act, 2004.

³⁹ UNCAC Theme, GTZ, 'NGOs – Partner in the Fight against Corruption?', Abteilung Staat und Demokratie Unterstützung von Partnerländern bei der Umsetzung der VN Konvention gegen Korruption (SV UNCAC) Deutsche Gesellschaft für Technische Zusammenarbeit (GTZ), December 2008, 1-4.

⁴⁰ *Ibid*.

research, aiding in and lobbying for the implementation of anti-corruption regulations or naming corruption cases.

4.2.1 Advocacy and Awareness

Through advocacy campaigns, protests, and media engagement, NGOs emphasises public awareness of corruption issues and mobilises public pressure regarding policy reforms.⁴¹ NGOs drive anti-corruption awareness through campaigns and education, thereby helping in fulfilling the mandates of anti-corruption laws like the Constitution of the Federal Republic of Nigeria 1999 section 15(5) and the fifth Schedule embedding the Code of Conduct Bureau, ICPC and EFCC Act mandates.⁴² Several NGOs act in this respect, for example the ‘Integrity-Nigeria’ implement EU-funded projects tracking corruption in universities and promoting United Nations Convention Against Corruption (UNCAC) 2003⁴³ through its Articles 12-22 on private sector integrity. Public enlightenment fosters reporting under ICPC Section 27, empowering citizens to investigate reports. NGOs also advocate for whistle-blower protections absent in current laws, pushing for comprehensive legislation.⁴⁴ Public enlightenment fosters reporting under ICPC Section 27, empowering citizens to investigate reports. NGOs also advocate for whistle-blower protections absent in current laws, pushing for comprehensive legislation.

4.2.2 Monitoring and Investigative Support

One of the key responsibilities of NGOs in the fight against political corruption is keeping watch over what’s happening within the government and what’s being done make officials accountable for their conduct. NGOs perform research, investigations, and audits to uncover cases of corruption, shining the spotlight on illicit activities and demanding transparency from elected officials.⁴⁵ NGOs monitor public procurement and projects, aiding EFCC and ICPC duties. ICPC’s Constituency and Executive Project Tracking Initiative (CEPTI) partners with NGOs for oversight (ICPC, 2025). EFCC Act Section 6 enables collaboration in preventing crimes. BudgIT uses civic tech to track budgets, strengthening systems with anti-corruption agencies. Public and Private Development Centre (PPDC) and Centre for Law Enforcement Education (CLEEN) Foundation expose illicit flows via Access Nigeria project, aligning with UN SDG 16 on commitments to fight corruption and illicit financial flows, increase transparency, and improve access to information.⁴⁶

4.2.3 NGOs Ensure Transparency and Availability of Information

Generally, NGO helps in ensuring that there is the promotion and enactment of policies and laws that enhance transparency and the availability of information, which would be helpful in fighting corruption. Through freedom of information legislation and open data services, civil society

⁴¹ Raghav, (n 33) 1.

⁴² ICPC Act, 2000, Section 6(e)-(f).

⁴³ The United Nations Convention against Corruption (UNCAC) was adopted by the UN General Assembly on October 31, 2003. It was later opened for signature in Merida, Mexico, from December 9–11, 2003, and entered into force on December 14, 2005.

⁴⁴ UNCAC Civil Society Coalition, “New Civil Society Report on Nigeria: Need for Greater Independence of Anti-Corruption Agencies and Sub-National-Level UNCAC Implementation”, 18 December, 2026.

⁴⁵ Raghav (n 33).

⁴⁶ Independent Corrupt Practices and Other Related Offences Commission (ICPC), “ICPC-CSO Partnership: Commendations Pour in, as Chairman Tasks stakeholders to Reaffirm Commitments to Ending Corruption”, https://icpc.gov.ng/icpc-csos-partnership-commendations-pour-in-as-commission-tasks-stakeholders-to-reaffirm-commitment-to-ending-corruption/?doing_wp_cron=1770646144.7920889854431152343750, access 11 February, 2026

ensures that citizens are able to demand information from their governments. Moreover, NGOs help in promoting transparency, which is helpful in ensuring that politicians earn public trust and that corruption is kept at bay.⁴⁷

4.2.4 Partnership with Anti-Corruption Agencies

Partnership by NGOs with different anti-corruption organisations include government agencies, business leaders, media organisations, and international donors, in combating political corruption together. Multi-stakeholder initiatives, anti-corruption forums, integrity pacts, and public-private ones. partnerships, leveraging collective know-how and resources to address This will make sure the corruption challenge is fully addressed. Through building alliances, NGOs amplify and build a culture of solidarity action against corruption.⁴⁸ To buttress this fact, ICPC's National Anti-Corruption Coalition (NACC) unites NGOs for integrity culture. EFCC trains NGOs on Anti-Money Laundering and Combating the Financing of Terrorism (AML/CFT) compliance, requiring donor screening and quarterly reports.

These partnerships leverage ICPC Section 6(c) for advice to agencies and EFCC's special powers.⁴⁹ Examples include PartnersGlobal with BudgIT and CLEEN on transparency.

It is important to state that BugdIT deals with budget tracking, civic tech for accountability, CLEEN Foundation area of activities is Anti-corruption research, Access Nigeria project, Integrity Nigeria follows up with service delivery monitoring, CBI for private sector, "Integrity Nigeria" are into service delivery monitoring, CBI for private sector and PPDC focuses on Public-private accountability tools.

4.2.5 Institutional Accountability Actions of NGOs and CSOs

NGOs and other Civil Society Organisations (CSOs) strives to improve institutional accountability mechanisms such as independent anti-corruption agencies, ombudsman offices, and parliamentary oversight bodies. CSOs collaborate with government agencies, judicial authorities, and international partners to enhance the capacity of oversight institutions and ensure effective anti-corruption law enforcement laws. By strengthening institutional accountability, civil society contributes to the deterrence and detection of political corruption.⁵⁰

4.3 Challenges Faced by NGOs in the Fight Against Corruption

In Nigeria, NGOs face harassment, funding constraints, and regulatory hurdles under CAMA and SCUML. EFCC warnings on terrorism financing stigmatize legitimate work. Limited sub-national UNCAC implementation hampers local efforts.⁵¹ Legal gaps, like inadequate whistleblower laws, expose activists to retaliation under section 64 of the ICPC Act.

Ali in his paper identified four major challenges of NGOs in the anti-corruption struggles viz: inadequacy of funding, lack of independence by the anti-corruption NGOs, the problem of transparency and accountability and lack of qualified human resources to manage these anti-

⁴⁷ Raghav (n 33).

⁴⁸ Raghav (n 33).

⁴⁹ EFCC Act, 2004 Section 7.

⁵⁰ Raghav (n 33).

⁵¹ SCUML, 'EFCC Charges International NGOs on Transparency, Accountability', 18 September 2021, <<https://scuml.efcc.gov.ng/efcc-charges-international-ngos-on-transparency-accountability/>>

corruption NGO.⁵² According to him, lack of capital to fund and manage NGOs is a major problem for these organizations. He explained that anti-corruption NGOs, as non-profits, don't have enough money to operate effectively. To succeed, they need independent funding that supports their strict ideology, sustainability efforts, core values, and vigilance. This funding independence is key to their progress and development, as well as their ability to negotiate with the state (government and law enforcement) and mass media. Such funding can come from donations or contributions by individuals, professional groups, and companies, with clear and specific condition.⁵³

The second problem is the anti-corruption organization is independence. NGOs must stay independent to survive and keep their declarations pure and honest. This allows anti-corruption NGOs to speak out in line with their vision and mission.⁵⁴

The third challenge identified by Mahfudz Ali as facing anti-corruption NGOs is the need for transparency and public accountability. These organizations must uphold transparency and accountability because they are typically controlled by a small group of people, which can lead to centralized decision-making. By applying these principles, all NGO activities can be monitored and held accountable to the public. He further explained the importance of transparency and accountability in anti-corruption NGOs' budgets operates on two complementary levels: (i) internal commitment, where the NGO builds accountability and transparency within itself and its own operations; and (ii) public access, which allows people to monitor how the NGO uses grants, including the right to know what is reported to donors.⁵⁵

Shatambaya, in his paper titled 'Civil Society Organizations (CSOs) and Anti-Corruption in Nigeria: Pathways for Improvement', identified poor funding, lack of national coverage, inadequate manpower, and excessive foreign influence as problems hindering the effective performance of NGOs in Nigeria. He maintained that the major challenge affects not only NGOs or CSOs but also government agencies established to tackle corruption. The fight against corruption is generally an expensive venture, and so both state and non-state actors require adequate funding to operate at maximum capacity. This is even more difficult for NGOs since they cannot draw funding from the public treasury. Generally, NGOs have to be cautious with their sources of funds in order not to jeopardise their independence and politicise their operations. According to him, anti-corruption NGOs get overwhelmed with reports from Nigerians on corruption, but they cannot do more than they are doing, even though they want to, due to the inadequacy of enabling resources. In essence, most of these NGOs could only operate as far as their budget could accommodate in supporting the fight against corruption. Generally, because of the challenge of funding many other NGOs are confronted with the problem of inability to sustain projects on anti-corruption. This means some projects are abandoned along the way because the funds to proceed are not readily available.⁵⁶

He further posits that among the numerous challenges facing the success of anti-corruption NGOs in the fight against corruption in Nigeria is that they operate mainly in one place, like Lagos or Abuja and have little or no connection with other centres of administration at the state and local government levels. This implies that "fundamentally, they are urban-based, urban-bound and

⁵² Mahfudz Ali. 'Empowerment of Anti-Corruption NGOs', International (2017) 14(4) *Journal of Business, Economics and Law*, 122-123.

⁵³ *Ibid.*

⁵⁴ *Ibid.*

⁵⁵ Ali (n 1) 122-123.

⁵⁶ Shatambaya, (n 1) 1-22.

urban-biased. While those based in places like Lagos and Abuja conduct their activities from where they are located, with no other functional administrative structure anywhere in the country. The implication of this is that most of their focus is on the activities of the federal government. They mostly emphasise their quest for accountability and transparency from the federal government, ignoring the chunk of corrupt activities that have taken over at the other levels of government”.⁵⁷

Among the list of challenges affecting anti-corruption NGOs as found by Shatambaya in his work, is in the area of staffing. The shortage of the required staff to effectively engage all aspects of corruption poses a major threat to their operations. Anti-corruption is about sound investigative work. This is on account of the fact that corruption is more often than not masked in such a way that it cannot easily be detected. It therefore takes a lot of skills in research and investigation to uncover such acts. The situation is made worse by inadequate finance which makes it difficult for them to hire full-time field researchers. There is also a gap in skills, which is one of the areas in which anti-corruption NGOs are battling with.

Experts in finance, prosecution, advocacy, and forensic investigative activities are not readily available to these organisations. This challenge is systemic in that some NGOs have more of these experts in their ranks than within some of the anti-graft agencies. The few that the organizations pride themselves of having are overwhelmed with so much that their impact is not maximally brought to bear on activities of anti-corruption in Nigeria.⁵⁸ Shatambaya also stated that the fight against corruption in the 21st century is one that has to be done systematically in order to achieve the desired result and it is clear from research findings that experts in various fields related to anti-corruption issues are not enough to ensure the effectiveness of these anti-corruption NGOs in their fight against corruption. This, therefore, determines the extent to which these NGOs can go in their crusade against corruption in order to promote the evolution of a sound anti-corruption system in Nigeria. On issues of excessive foreign influence, the fight against corruption in the world is one of the key themes of global governance that Western capitalist countries and their agencies promote. Democracy, which is also associated with Western capitalism, has several institutions, the main ones being the civil society organisations.⁵⁹ Some of the anti-corruption agencies that have been formed have the aim of protecting and promoting human rights, basic freedoms, justice, the rule of law, and any other essence considered sacred according to democratic values and principles. Operating globally and at the local level, most NGOs in third-world countries derive their funds mainly from foreign sources, most of which are from the capitalist Western Hemisphere. In Nigeria, most of the NGOs that are at the forefront of the fight against corruption have massive support in technical and material forms from foreign sources. The postulation is that most of these NGOs have the objective of carrying out programmes that are inclined to satisfy foreign interests, not the need for the fight against corruption, even though the programme is related to the locals.⁶⁰

Government interference is a common challenge that is experienced by anti-corruption NGOs across most third-world countries, like Nigeria. This is associated with a tendency that develops due to the nature and activeness of NGOs against corruption. There is a tendency for animosity and lack of trust on the part of the government towards NGOs due to the watchdog, whistleblowing, and enlightening role that NGOs to ensure that the government is made to take

⁵⁷ Shatambaya, (n 1).

⁵⁸ *Ibid.*

⁵⁹ *Ibid.*

⁶⁰ Shatambaya, (n 1).

responsibility and be transparent in the execution of its functions. The government sometimes tends to lose patience and interfere with the operations of NGOs in one way or another, depending on prevailing circumstances. This is a demonstration of high-handedness by the government as they deal with NGOs, which is a barrier to their engagement in matters like the fight against corruption.⁶¹

As summarily presented by Ali in his paper,⁶² the challenges of anti-corruption NGOs on why they have not been able to contribute greatly to the fight against corruption is because of two main factors, which are: internal and external factors. The internal factors led to the incapability of anti-corruption NGOs, including: the funding organisation, the independence of the organisation, transparency and public accountability, and human resources and work program. While the external factors, which led to the incapability of anti-corruption NGOs, including: the officials of the government, government institutions, law enforcement institutions, have not really taken the spirit of fighting corruption, even collaborate to destroy the spirit of combating corruption, the institutions are transparent, accountable to the public and therefore require extra energy to get public documents in the skeleton to contribute to the prevention of corruption and to oversee the implementation of the public agenda to avoid deviation, law enforcement institutions at this stage of investigation, investigation, prosecution, and the trial process in court have not wholeheartedly carry out the mandate constitution even have the old culture that exploit the matter, they violate the law, there are no party agencies that perform the roles of carrying, guarding, and fighting corruption, yet as they are busy with their own work of protecting their party members involved in corruption, they have not yet awakened the networking togetherness, solid inter-government organisations with journalists, universities, religious leaders, artists, business people, etc., that can awaken the public awareness to rise up together in fighting corruption.⁶³

Again, NGOs and individuals involved in the fight against corruption face the risks of being harassed, harmed and compromised by powerful elites.⁶⁴ For instance, according to Essoungou, the staff of NGOs in Nigeria are usually "poached" by corrupt officials who offer them lucrative positions in government, while in Congo and Uganda, the NGOs are usually harassed by the police or the judiciary.⁶⁵ Other challenges, include sustainability and funding. In some instances, the NGOs themselves become corrupt. There have been corruption scandals involving NGOs in many countries, including Finland, Honduras, Nigeria, USA, among others.⁶⁶

Another difficulty in the effective involvement of NGOs in the fight against corruption is the utilization of NGOs as political tools. This may happen, for instance, when a high-ranking public official or a member of the government, or even a family member, heads an anti-corruption NGO. In such a situation, there is a serious conflict of interest. It is even doubtful whether such an NGO operates in the public interest. Moreover, if a large number of NGOs in a particular country are headed or owned in a similar way, then instead of taking the necessary steps to hold officials accountable, or to press the State to introduce reforms and ensure transparency, the NGOs might do the reverse and even contribute to corruption.⁶⁷

⁶¹ *Ibid.*

⁶² Ali (n 1).

⁶³ *Ibid.*

⁶⁴ UNODC, (n 29).

⁶⁵ See A. Essoungou, 'The Rise of Civil Society Groups in Africa', *Corruption Watch*, 8 January, 2014 in: UNODC (n 29).

⁶⁶ D.J smith, 'Corruption, NGOs, and Development in Nigeria', (2010) *Third World Quarterly*, in UNODC (n 22).

⁶⁷ UNODC (n 29).

5. Alignment with UN Sustainable Development Goals (SDGs) 2015

The paper directly aligns with the UN Sustainable Development Goal 16 addressing issues of peace, justice and strong institutions, particularly its targets on reducing corruption, developing effective accountable institutions, and promoting access to information.⁶⁸ By detailing NGOs' roles like advocacy, budget monitoring by BudgIT, and partnerships with EFCC/ICPC the paper shows how these groups fill gaps in Nigeria's anti-corruption ecosystem, advancing transparent governance amid institutional weaknesses.

This paper target Goal 16.5 that deals with reducing corruption and bribery and it explains how NGOs drive prevention via UNCAC-aligned activities (e.g., awareness campaigns, whistleblower support), exposing illicit flows through projects like PPDC's Access Nigeria and CLEEN Foundation's research. This complements EFCC/ICPC enforcement, fostering a culture of integrity. Goal 16.6 addresses effective accountable institutions through monitoring public procurement and institutional accountability (e.g., ICPC's CEPTI with NGOs), the paper highlights NGOs as watchdogs enforcing laws like the Freedom of Information Act 2011 and CAMA 2020, building public trust. Finally Goal 16.10 pushes for access to information and justice which requires NGOs to promote open data and citizen reporting (ICPC Section 27), aligning with SDG commitments to combat illicit financial flows. These efforts link to Nigeria's 1999 Constitution (Section 15(5)) and UNCAC pillars, positioning NGOs as vital for SDG 16's "inclusive societies" in Africa's corruption-prone contexts.⁶⁹

6. Conclusion

This paper concludes that non-governmental organizations (NGOs) remain indispensable watchdogs in Nigeria's protracted battle against corruption, bridging institutional gaps left by agencies like the EFCC and ICPC through advocacy, monitoring, and partnerships under frameworks such as the Freedom of Information Act 2011, EFCC Act 2004, and UNCAC. Exemplified by BudgIT's civic tech for budget tracking, CLEEN Foundation's research via Access Nigeria, PPDC's accountability tools, and PWAN's multi-stakeholder initiatives, these entities advance SDG 16 targets on reducing bribery (16.5), building accountable institutions (16.6), and ensuring information access (16.10). Despite progress like the National Anti-Corruption Strategy (NACS) and tools such as BVN/NIN/IPPIS, persistent challenges—funding deficits, urban bias, skilled personnel shortages, regulatory hurdles under CAMA/SCUML, government harassment, and absent comprehensive whistle-blower laws curtail their efficacy, as echoed in recent UNCAC.

7. Recommendations and Way Forward

To harness NGOs' potential for sustainable anti-corruption impact, stakeholders must prioritize reforms: secure independent, diversified funding free from foreign overreach; enact robust whistle-blower protections and expedite sub-national UNCAC rollout; invest in capacity building for investigative expertise and nationwide expansion beyond urban centers; and foster multi-stakeholder coalitions via platforms like ICPC's NACC, integrating NGOs with government, media, and donors. Depoliticizing anti-corruption bodies, enhancing judicial independence, and monitoring NACS implementation through transparent metrics will further empower civil

⁶⁸ UN Resolution adopted by the General Assembly on 25 September 2015, 70/1. The Sustainable Development Goals (SDGs) provide a framework for global development efforts and also provide direction for governments (UN, 2015). <<https://docs.un.org/en/A/RES/70/1>> accessed 13 February, 2026.

⁶⁹ *Ibid.*

society. Ultimately, empowering NGOs with legal safeguards and resources will not only amplify transparency and justice but also propel Nigeria toward SDG 16 fulfilment, curbing economic losses and fostering inclusive development for all citizens.

The paper's call for reforms sustainable funding, legal safeguards, capacity building, multi-stakeholder networks offers a roadmap to amplify NGOs' SDG 16 role. Strengthening these could enhance Nigeria's UNCAC compliance and global anti-corruption benchmarks, promoting justice in line with African Union agendas. Overall, it proves NGOs indispensable for SDG 16 amid governmental shortfalls, urging policy action for scalable impact.