

An Analysis of the Legal Framework for Combatting Human Trafficking in Nigeria: Prospects and Challenges for Inter-Agency Co-Operation

Akobella Tommy Joshua 

Nigerian Institute of Advanced Legal Studies, Supreme Court Complex, Abuja, Nigeria

Email: joshua_bella@yahoo.com

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Abstract

Human trafficking has been one of the scourges of Nigerian society since pre-colonial times. Prior to the advent of colonial rule, different Nigerian cultures had practiced human trafficking in diverse forms like child labour, slavery and forced labour. With the trans-Saharan and trans-Atlantic slave trades, human trafficking assumed the form of export of human beings to work as slaves in foreign lands. Although the advent of the industrial revolution in the 18th century saw to the abolition of the trans-Atlantic slave trade in 1807, various forms of human trafficking persisted in Nigeria during colonial rule facilitated mainly by cultural practices. In contemporary times, human trafficking has leveraged the opportunities afforded by the internet and digital spaces to source for victims online. The growing and ambulatory nature of human trafficking today demands the synergy and cooperation of law enforcement agencies to combat it. This paper examines the legal framework for combatting human trafficking in Nigeria and the impact of the interface of the various agencies dedicated to its eradication. The paper argues that although the principal agency dedicated to the war against human trafficking in Nigeria is the National Agency for the Prohibition of Trafficking in Persons (NAPTIP), other security and law enforcement agencies like the police and Immigration Service are also involved in varying degrees in the anti-human trafficking effort. The paper scrutinizes the degree to which inter-agency cooperation or the lack of it is impacting on the success or failure of Nigeria's anti-human trafficking campaign. Adopting the doctrinal research methodology, the paper finds that although the agencies involved in the fight against human trafficking are favourably disposed to working together in the counter-human trafficking campaign, there are many factors militating against the success of such collaboration. Some of these fac-

tors include paucity of funds, inadequate personnel training and corruption and official complicity. The paper concludes with recommendations for the remediation of the identified challenges. The recommended solutions include incorporation of the national anti-corruption programme into the counter-human trafficking campaign, improved budgetary allocations to counter-human trafficking agencies and operations and centralized training and capacity building programmes for all the counter-human trafficking agencies and personnel in the country.

Keywords

Human Trafficking, NAPTIP, Co-Operation, Legal Framework, Inter-Agency

1. Introduction

Human trafficking is a crime in Nigeria as it is in most parts of the world. Historically, it has evolved from pre-colonial cultural practices to modern forms of exploitation including modern day slavery and organ harvesting (Barker, 2026). The perpetrators of human trafficking include parents, guardians of vulnerable groups like women and children, organized criminal gangs and even religious leaders (Adeyinka, Lietaert, Darluyn, 2023).

Nigeria, like many other countries, has evolved legal and administrative mechanisms to contain human trafficking. The legal framework against human trafficking include the Constitution of the Federal Republic of Nigeria, 1999 (the Constitution) which guarantees the dignity of the human person and prohibits slavery, servitude and forced or compulsory labour,¹ Criminal Code Act which criminalizes slave dealing,² procuring a female under the age of 18 for the purpose of prostitution³ and the use or threat of force to facilitate unlawful carnal knowledge of a woman or girl.⁴ Others include Child's Rights Act (CRA)⁵ and the Trafficking in Persons (Prohibition) Enforcement and Administration Act (TPPEA).⁶

The agencies that enforce Nigeria's anti-human trafficking legal framework include the National Agency for the Prohibition of Trafficking in Persons (NAPTIP), the Nigeria Police Force, the Nigerian Immigration Service, the Federal and State Ministries of Justice and the Ministries of Women Affairs of the Federal Government and the various State governments (Alubo, 2012).

The focus of this paper is to explore how these various bodies cooperate with

¹See Section 34 (1) (b) (c), Constitution.

²Section 369 Criminal Code Act.

³Section 223 Criminal Code Act.

⁴Section 224 Criminal Code Act.

⁵See sections 28 and 30 CRA that prohibit and criminalizes exploitative child labour and child selling/buying.

⁶See sections 21, 22, 23, 24 and 25 TPPEA which prohibit, buying and selling of human beings for any purpose, forced labour, employment of a child as domestic worker, trafficking in slaves and slave dealing, respectively.

or impede each other in the discharge of their functions and the impact of such cooperation or rivalry in Nigeria's fight against human trafficking. The paper is presented in six parts excluding the abstract. The first part is this introduction followed by a discussion of the meaning and scope of human trafficking. The third part explores the legal framework for combatting human trafficking in Nigeria. An overview of agencies involved in fighting human trafficking in Nigeria is given in the fourth part while the prospects and challenges of inter-agency cooperation is discussed in the fifth part. The sixth part is the conclusion which also contains suggestions for effective anti-human trafficking effort.

1.1. Research Methodology

This research employs the doctrinal method. It is based on library research drawing on primary and secondary legal materials.

The primary sources examined are the Constitution of the Federal Republic of Nigeria 1999; the Trafficking in Persons (Prohibition) Law Enforcement and Administration Act 2015; the Labour Act; the Child Rights Act 2003; the Violence Against Persons (Prohibition) Act; the Criminal Code; other Nigerian legislation relating to human trafficking; relevant international legal instruments; and case law.

On the other hand, secondary materials consulted include textbooks on law and related disciplines, edited book chapters, journal articles, encyclopedias, dictionaries, periodicals, newspapers, and credible internet sources. The research also draws on expert opinions and the published and unpublished works of eminent scholars relevant to the subject matter.

Finally, the article employs contextual analysis to examine the materials gathered and to present objective findings.

1.2. Meaning and Scope of Human Trafficking

There are different definitions of human trafficking depending on the contextual usage. Different authorities define it in ways that are relevant to their realities. However, in Nigeria, it is statutorily defined as "All acts and attempted acts involved in the recruitment, transportation within or across Nigerian borders, purchases, sales, transfer, receipt or harbouring of a person involving the use of force, deception, coercion, or debt bondage for the purpose of placing or holding the person whether for or not in involuntary servitude (domestic, sexual or reproductive) in forced or bonded labour, or in slavery-like condition."⁷

But, the globally accepted definition of human trafficking is provided by the Protocol to Prevent, Suppress and Punish Trafficking in Persons Especially Women and Children, supplementing the United Nations Convention against Transnational Organized Crime (Palermo Protocol, 2000) uses the term "trafficking in persons" which it defines as "the recruitment, transportation, transfer, harbouring or receipt of persons, by means of the threat or use of force or other forms

⁷Section 82 TIPPEA.

of coercion, of abduction, of fraud, of deception, of the abuse of power or of a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control over another person, for the purpose of exploitation. Exploitation shall include, at a minimum, the exploitation of the prostitution of others or other forms of sexual exploitation, forced labour or services, slavery or practices similar to slavery, servitude or the removal of organs.”⁸

The TIPPEA’s definition of human trafficking falls short of the Palermo Protocol in that it omits organ harvesting in the definition of human trafficking. But notwithstanding the slight differences in the two definitions, one common thread runs through human trafficking namely, the exploitation of the vulnerability of other people.

From the Palermo Protocol (Suchecki, 2019), human trafficking consists of three elements. These are:

1) The Act—This means physical actions involving “the recruitment, transportation, transfer, harbouring or receipt of persons”.

2) The Means—To qualify as human trafficking, the act must be perpetrated by means of any of the following methods: the threat/use of force or other forms of coercion, abduction, fraud, deception, abuse of power or the vulnerability of the victim or of the giving or receiving of payments or benefits to achieve the consent of a person having control over the victim.

3) The purpose—The purpose of human trafficking must be for exploitation. Exploitation includes the exploitation of the prostitution of others or other forms of sexual exploitation, forced labour or services, slavery or practices similar to slavery, servitude or the removal of organs (Wijers, 2005).

Human trafficking can be either internal or external. Internal trafficking is the exploitation of a person within the territory of a sovereign State while external human trafficking is the transportation of a person across international borders for purposes of exploitation (Tessitore et al., 2022). Although the Palermo Protocol only concerns itself with transnational human trafficking or external trafficking, the State Parties are obliged to take measures to criminalize and penalize acts of human trafficking that occur internally within their borders.⁹

The Palermo Protocol does not create specific human trafficking offences on its own steam. Rather, States Parties assume obligation to criminalize activities which the Protocol regard as constituting human trafficking. The TIPPEA, on the other hand, is a municipal enactment of the National Assembly that gives effect to the Nigeria’s treaty obligations in the Palermo Protocol.

1.3. Definition of Inter-Agency Co-Operation

Inter-agency co-operation in the context of human trafficking refers to the coordinated collaboration among government agencies, law-enforcement bodies, ju-

⁸Article 3 Palermo Protocol.

⁹Article 4 Palermo Protocol.

dicial institutions, health and social-service providers, civil society organisation and other relevant stakeholders to prevent trafficking, identify victims, investigate and prosecute traffickers, and provide protection and assistance to victims. It involves the sharing of information, expertise, resources and responsibilities to ensure an effective and coordinated response to trafficking.¹⁰

From a victim-centred perspective, inter-agency co-operation places the rights, dignity, safety, welfare and individual needs of victims at the centre of institutional responses. It requires agencies such as NAPTIP, the police, immigration authorities, health institutions, prosecutors and social-welfare agencies to work together to provide victims with protection, medical and psychological care, legal assistance, rehabilitation and reintegration, while preventing further exploitation and secondary victimisation (Gallagher & Surtees, 2012).

2. Legal Framework for Combatting Human Trafficking in Nigeria

The legal framework for combatting human trafficking in Nigeria comprises Nigeria's municipal laws and international obligations. The principal internal instrument governing human trafficking in Nigeria is the TIPPEA. Its principal international counterpart is the Palermo Protocol.

The Palermo Protocol concerns itself with cross national or external trafficking.¹¹ The TIPPEA covers both internal and external trafficking. The primary statute for fighting human trafficking in Nigeria is the TIPPEA and NAPTIP is the main institution for its implementation. Apart from NAPTIP other agencies involved in fighting human trafficking include the Nigerian Police, the Nigerian Immigration Service and other governmental agencies like the ministries of Women Affairs and Social Welfare of the Federal and State Governments.

The local statutes and policies enacted to fight human trafficking include the Constitution of the Federal Republic of Nigeria (the Constitution), TIPPEA, the Child's Rights Act (CRA), the Violence against Persons (Prohibition) Act (VAPP) and the Criminal Code.

The Constitution is the Supreme law of the land from which all other laws derive their validity.¹² The key constitutional provisions relevant to human trafficking are found in the fundamental human rights provisions contained in Chapter IV of the Constitution. These constitutional provisions include Section 34 of which states that: "(1) Every individual is entitled to respect for the dignity of his person, and accordingly-

- a) no person shall be subject to torture or to inhuman or degrading treatment;
- b) no person shall be held in slavery or servitude; and
- c) no person shall be required to perform forced or compulsory labour."

¹⁰United Nations Office on Drugs and Crime (UNODC), Toolkit to Combat Trafficking in Persons.

¹¹(n11).

¹²Section 1 (1) and (2) of the Constitution.

Other fundamental rights provisions applicable to human trafficking are Sections 35 dealing with right to personal liberty and Section 40 dealing with right to freedom of movement. The thinking is that victims of human trafficking are subject to inhuman treatment and sometimes deprived of the freedom of movement (Lawal & Yekini, 2024).

The principal domestic counter-human trafficking statute is the TIPPEA. Its key feature is the creation of the NAPTIP.¹³ Its functions include the administration and enforcement of the TIPPEA; coordination and enforcement of all other counter-trafficking laws; developing effective counter-trafficking measures, among other and related functions.¹⁴ It also creates human trafficking offences including importation and exportation of human beings,¹⁵ procurement of persons for sexual exploitation,¹⁶ abuse, procurement or recruitment of persons under 18 years for prostitution and sexual exploitation,¹⁷ illegal organ harvesting,¹⁸ etc.

The Child Rights Act (CRA) is another counter-trafficking statute that seeks to fight trafficking in persons in Nigeria. It is fashioned after the International Convention on the Rights of the Child (CRC) which primary aim is the protection of the best interest of the child in all matters affecting the child (Olawal, 2025; Nwachuku, 2017). Section 26 of the CRA prohibits use of a child for criminal activities. Section 27 prohibits abduction or removal of a child from lawful custody while section 28 of the CRA prohibits use of a child in exploitative labour. Section 31 also prohibits the recruitment of child soldiers. The CRA also provides for preventive measures against child trafficking by creating duties for the parents and guardians of the child as well as the state and society as a whole.¹⁹ These duties are imposed to safeguard the child from exploitation and where exploitation occurs, to ensure safe remediation and retribution (Bashir, 2026).

Of significant interest to some commentators is the provision of Section 30 of the CRA which provides that: “No person shall buy, sell, hire, let on hire, dispose of or obtain possession of or otherwise deal in a child.” This provision is said to have outlawed paid surrogacy in Nigeria as a form of human trafficking (Ogwezzy, 2023). The argument is that receiving payment to carry the child of another and later handing over the child to the payer violates this provision.

Section 214 (1) of the Constitution establishes the Nigerian Police Force as the sole policing authority in the country. Its functions include crime prevention, investigation and (subject to other constitutional provisions), prosecution. The general powers of the police which are donated by the Constitution are not prejudiced

¹³Section 2 TIPPEA.

¹⁴Section 5 TIPPEA.

¹⁵Section 14 TIPPEA.

¹⁶Section 15 TIPPEA.

¹⁷Section 16 TIPPEA.

¹⁸Section 20 TIPPEA.

¹⁹Sections 19 and 52 of the CRA.

by the TIPPEA in favour of the NAPTIP. Indeed, the language of the TIPPEA in giving the NAPTIP the powers to coordinate other law enforcement agencies engaged in counter human trafficking activities manifestly implies that such other agencies including the police can retain their counter trafficking powers subject to the coordination of the NAPTIP. The police is vested with universal powers to fight crime including human trafficking and have indeed been engaged in that effort.²⁰ It is also required to cooperate with other government agencies and private initiatives in the attainment of its core functions.²¹ The implication of these provisions is that the police is legally empowered to initiate efforts to prevent, detect and investigate human trafficking in addition to cooperating with NAPTIP and other law enforcement and counter trafficking agencies.

How the Palermo Protocol Operates within Nigeria's Constitutional Framework and the Link to TIPPEA

The Palermo Protocol operates within Nigeria's constitutional framework through the principle of domestication of treaties under section 12(1) of the Constitution of the Federal Republic of Nigeria 1999.²² Although Nigeria has ratified the Protocol, its provisions do not automatically acquire the force of domestic law merely by ratification. They must be enacted into Nigerian law by the National Assembly (Gallagher, 2010). This constitutional requirement ensures that international obligations relating to human trafficking are given legal effect through domestic legislation and remain subject to Nigeria's constitutional and legislative framework.²³

The principal domestic legislation giving effect to Nigeria's obligations under the Palermo Protocol is the Trafficking in Persons (Prohibition), Enforcement and Administration Act (TIPPEA), now principally administered through the National Agency for the Prohibition of Trafficking in Persons (NAPTIP).²⁴ TIPPEA incorporates the Protocol's central objectives by criminalising trafficking in persons, establishing institutional mechanisms for enforcement, and providing measures for the protection and assistance of victims.²⁵ Thus, the Protocol provides the international legal framework, section 12 provides the constitutional mechanism for domestication, while TIPPEA provides the principal domestic legislative framework through which Nigeria implements its anti-trafficking obligations.

3. Agencies Involved in Combatting Human Trafficking in Nigeria

There are several agencies which are involved, one way or another, in counter

²⁰Section 4 Police Act, 2020.

²¹Section 5 Police 2020.

²²Constitution of the Federal Republic of Nigeria 1999 (as amended), s 12(1).

²³*Abacha v Fawehinmi* (2000) 6 NWLR (Pt 660) 228 (SC), where the Supreme Court affirmed that an international treaty does not automatically become enforceable as domestic law in Nigeria without domestication pursuant to section 12 of the Constitution.

²⁴Trafficking in Persons (Prohibition), Enforcement and Administration Act 2015 (TIPPEA), ss 1-2.

²⁵I Chukwuma, *Victim Participation and Access to Justice in Nigeria* (CLEEN Foundation 2017).

human trafficking efforts. The frontline agencies are the NAPTIP, the Police and the Nigerian Immigration Service (NIS). Others are the National Drug Law Enforcement Agency (NDLEA). The Federal and State Ministries of Women Affairs and Social Welfare and the Federal and State Ministries of Justice and the Courts. This paper will limit its detailed attention to three of these agencies which are NAPTIP, the Nigeria Police Force and the Nigerian Immigration Service (NIS).

3.1. NAPTIP

As already stated in this paper, NAPTIP is a creation of the TIPPEA. Apart from the bald statutory provisions already cited in this paper, NAPTIP has developed practical measures to give teeth to the legal provisions of TIPPEA. For example, the provisions of Section 50 of the TIPPEA demand humane treatment of victims of trafficking. These include non-discrimination on grounds of “race, colour, gender, sex, age, language, religion, political or other opinion, cultural beliefs or practices, national ethnic or social origin, property, birth or other status, including his status as a victim of trafficking or having worked in the sex industry.” Access to health, legal and consular services, provision of transit shelters and immunity from prosecution are some of the other minimum standards of treatment.

NAPTIP’s strategic approach to human trafficking management include adoption of preventive measures (e.g. public sensitization, intelligence gathering and sharing, etc.), victim rescue and rehabilitation and enforcement measures (including investigations, prosecution and securing conviction and asset forfeiture) (Bello & Okonjo, 2025).

In furtherance of the provisions of Section 50 of TIPPEA, NAPTIP has developed specific programmes and policies aimed at achieving its mandate. In 2021, the agency adopted a 4-point priority strategy in the discharge of its functions. These are prevention, protection, prosecution and partnership (Daily Trust Newspaper, 2021).

Prevention: NAPTIP has made effort to prevent the commission of trafficking offences. Some of the preventive measures include public enlightenment, intelligence gathering and preemptive actions against perpetrators such as identification and blocking of transit routes.

Protection: The protection component of the priority strategy comprises the rescue and rehabilitation of the victims. Under this rubric, victims are expected to be shielded from discrimination, stigmatization and re-victimization.²⁶ Provision of transit shelters and victim compensation falls under this function too. Victim compensation is made either directly by the perpetrator or from the Victim of Trafficking Trust Fund created pursuant to Section 67 of the TIPPEA.

Prosecution: The agency is empowered to administer and enforce the provisions of the TIPPEA. In addition to this general provision, the agency is also imbued with prosecutorial powers over the offences created by the Act.²⁷ This power

²⁶See sections 61, TPPEA

²⁷Sections 5 and 6 TIPPEA.

of enforcement includes power of arrest and detention.²⁸ The outcome of prosecution could result to incarceration, asset forfeiture or deportation.²⁹

Partnership: NAPTIP is statutorily required to seek cooperation and partnership with other law enforcement agencies and bilateral/multilateral international organizations and arrangements.³⁰ As a coordinating counter trafficking body, NAPTIP shares and receives intelligence from sister agencies.

Apart from local law enforcement, NAPTIP has sought and is in active partnership with several international organizations such as the United Nations Office for Drugs and Crime, International Organization for Migration and the INTERPOL (Ukhami, 2024).

The implementation plan of the four priority strategies is embodied in the National Action Plan on Human Trafficking (NAP) (2022-2026) (NAPTIP, 2022). The NAP is a 5-year implementation plan funded by the Swiss Government aimed at coordinating the counter trafficking efforts of all stakeholders involved in the counter trafficking campaign (UNODC, 2025). The NAP is a strategic national initiative to address trafficking in Nigeria, by clarifying objectives and modalities to guide stakeholders in achieving their respective objectives. The action plan includes recommended standards for data collection/analysis, reporting mechanisms, victim support, stakeholder collaboration, monitoring procedures and other related matters (UNODC, 2025).

3.2. The Police

The general constitutional duty of the police with regard to crime prevention, detection and public safety and security includes the task of preventing and investigating human trafficking. Pursuant to this general duty, the Nigerian Police Force has set up and maintained anti-human trafficking units in all its State Commands for the past 18 years (Reliefweb, 2008).

Like NAPTIP, the police possess prosecutorial powers over crimes like human trafficking.³¹ However, with the enactment of Section 66 (1) of the Administration of Criminal Justice Act (ACJA), 2015, this power is no longer absolute. Rather it is restricted to police officers who are also qualified legal practitioners.³² Thus, lay police prosecutors no longer have right of audience in Nigerian courts. Apart from the restrictions imposed by the ACJA and the Police Act on the prosecutorial competence of the police, Section 174 (1) of the Constitution also makes the prosecutorial powers of the police and indeed of any other person or authority in Nigeria subject to the Attorney-General's powers to institute, undertake, take over, continue or discontinue any criminal proceedings before any court in Nigeria (except a court martial) (Jonathan & George, 2025).

In practical terms, there is some synergy between NAPTIP and the Nigerian

²⁸Ibid.

²⁹Sections 25 and 26, TIPPEA.

³⁰Sections 5, 6 and Part XI, TIPPEA.

³¹*FRN v. Osahon* (2006) 5 NWLR (Pt. 973) 261.

³²See also Section 66 of the Police Act 2020.

Police Force in the counter trafficking effort (Habib, 2023). This synergy and co-operation have led to intelligence sharing and even joint operations sometimes between NAPTIP and other security organizations including the police (Anyanwu, 2025).

3.3. Immigration Service (NIS)

The NIS is a critical institution of national security in Nigeria making significant contributions to the fight against human trafficking (NIS, 2025). It is established by Section 1 off the Immigration Act, 2015 and its core functions include the control of persons entering or leaving Nigeria, issuance of Nigerian passports, issuance of residence permits to foreigners and border surveillance and patrol.³³

The NIS' duties of control of ingress and egress and border patrol stretch to counter human trafficking duties. The service has performed this duty creditably by rescuing victims of transnational human trafficking from international organized crime syndicates.³⁴ The role of the NIS in the counter trafficking campaign takes the forms of border patrol, control of travel documents, border surveillance, data collection and analysis, evidence gathering and investigation, inter-agency partnership, rescue of victims and arrest and prosecution of traffickers.

In practice, the NIS has partnered with NAPTIP and other security agencies in preventing cross border trafficking, victim rescue and arrest of traffickers.³⁵ The NIS also facilitates the repatriation of victims of trafficking from outside Nigeria back to the country as well the deportation of convicted foreign traffickers' resident in Nigeria.

3.4. The Federal-State Reach of the Child Rights Act and the VAPP Act and How State Adoption Affects Enforcement and Coordination

The federal-state reach of the Child Rights Act (CRA)³⁶ and the Violence Against Persons (Prohibition) Act (VAPP Act)³⁷ significantly affects the practical operation of Nigeria's protection framework. The CRA, enacted by the National Assembly³⁸, provides a comprehensive framework for the protection of children, but its implementation across Nigeria depends substantially on state adoption and domestication, particularly because matters relating to child welfare, family affairs and social services involve state institutions. Similarly, although the VAPP Act

³³Section 2 (1) Immigration Act, 2015.

³⁴The Nation, Immigration rescues 36 human trafficking victims, denies 332 foreigners entry into Nigeria, The Nation; (11 November, 2025), <https://thenationonline.ng/immigration-rescues-36-human-trafficking-victims-denies-332-foreigners-entry-into-nigeria/>, accessed February 28, 2026; NAPTIP, NIS Step Up Partnership to Tackle TIP and SOM in Nigeria, NAPTIP, (November 22, 2024) accessed February 28, 2026.

³⁵NAPTIP, NAPTIP, NIS Step Up Partnership to Tackle TIP and SOM in Nigeria, <https://naptip.gov.ng/naptip-nis-step-up-partnership-to-tackle-tip-and-som-in-nigeria/>, accessed march 1, 2026.

³⁶Child Rights Act 2003, ss 1-274.

³⁷Violence Against Persons (Prohibition) Act 2015, ss 1-55.

³⁸Constitution of the Federal Republic of Nigeria 1999 (as amended), ss 4 and 12.

establishes federal standards for preventing and responding to violence, its effective application within states is strengthened where state-level legislation adopts the Act or establishes substantially similar provisions (Ngozi et al., 2018).

Consequently, differences in state adoption create variations in the availability of offences, remedies, institutions and victim-support mechanisms across the country. This fragmentation also affects inter-agency coordination, because federal agencies such as NAPTIP, the police and immigration authorities may have to operate alongside different state laws, institutions and procedures. State adoption therefore promotes uniformity, facilitates referral and cooperation among agencies, and improves consistent enforcement and victim protection, while non-adoption may create legal and institutional gaps that weaken the practical effectiveness of the overall framework (Gallagher, 2010).

3.5. Decided Cases Where NAPTIP, the Police, and the NIS Acted Jointly or Encountered Overlap in Powers

Samson Ivenseri v Attorney-General of the Federation (2018) provides a useful judicial illustration of institutional overlap. In that case, the Nigeria Immigration Service (NIS), Seme Command, intercepted and transferred 14 persons to NAPTIP after they had been intercepted by the Beninese Police in connection with suspected trafficking. NAPTIP subsequently commenced proceedings against the appellant for trafficking-related offences. The case demonstrates how the NIS's border-control and interception functions can trigger NAPTIP's investigation and prosecution mandate, thereby requiring institutional referral and cooperation.³⁹

A more recent official prosecution example is the prosecution of Christiana Uadiale Jacob.⁴⁰ After she absconded to Dubai while on bail in a NAPTIP trafficking prosecution, NAPTIP sought the assistance of the Attorney-General of the Federation, INTERPOL Nigeria, the NIS, the National Intelligence Agency and UAE authorities. NIS subsequently acted on NAPTIP's watch-list request and arrested her upon her arrival in Nigeria on 31 December 2024. NAPTIP reported that she had earlier been convicted *in absentia* by the Federal High Court, Asaba, on 21 March 2024. This illustrates how NAPTIP's prosecution mandate intersects with NIS's border-control and immigration functions.

These examples demonstrate that inter-agency cooperation is not merely an institutional ideal. In practice, trafficking cases frequently move across the mandates of NAPTIP, the NPF and NIS: the police may detect or investigate an offence, NIS may intercept persons at borders or during migration operations, while NAPTIP assumes its statutory role in specialized trafficking investigation, victim protection and prosecution. NAPTIP itself acknowledges its long-standing collaboration with the Police and NIS, including joint operations and the transfer of trafficking-

³⁹*Samson Ivenseri v Attorney-General of the Federation* (2018) LCN/11641(CA), CA/B/302C/2008 (Court of Appeal, Benin Division).

⁴⁰National Agency for the Prohibition of Trafficking in Persons (NAPTIP), "NAPTIP Arrests Notorious Dubai-based Human Trafficker" (official account reported in *The Guardian*, 2025).

related cases between agencies.

4. Prospects and Challenges of Inter-Agency Cooperation

From the analysis of the contributions of the various agencies involved in the anti-trafficking campaign in Nigeria, it is apparent that all the agencies concerned are favourably disposed to cooperating with each other in the campaign. However, there are challenges that militate against the success of such partnership. This section of the paper discusses the potentials for success and the factors that work against the attainment of full inter-agency synergy (Akinseye-George, 2005).

The first prospect for the success of inter-agency cooperation in the fight against human trafficking is that there is about a two-decade experience of such cooperation especially between the Nigerian Police Force and NAPTIP. Since the creation of NAPTIP in 2000, it has enjoyed a healthy symbiotic relationship with the police. This creates some level of institutional memory or culture of partnership between the two agencies. Similar arguments could also be made in reference to the NIS and NAPTIP. These historical antecedents raise a reasonable expectation of future professional cooperation and partnership among these different agencies.

Closely aligned to the historical antecedents of inter-agency partnership in the counter trafficking campaign is the benefit of decades of experience of counter-trafficking training and specialization. Several agencies have created anti-human trafficking units in their organizations. The existence of such specialized units over a prolonged period of time raises a reasonable expectation that highly skilled personnel would have been groomed and expertise in counter trafficking developed among the operatives of these agencies. This implies that any of the agencies engaged in counter trafficking activities can competently mount counter trafficking operations including arrests, investigations and even prosecution without being bogged down by bureaucratic bottle necks (Jefferson, 2006).

Thirdly, the presence of multiple agencies fighting human trafficking and the cordiality that exists among them narrows the operational sphere and escape routes for human traffickers especially transnational traffickers. For instance, it is well-nigh impossible for transnational traffickers to successfully evade the NDLEA, the Nigerian Customs Service, the NIS, the police, military personnel and NAPTIP at a border post. This might account for the growing use of informal migration routes by traffickers (Ashworth, 2000).

Despite the successes or potential successes of multiple agency partnership in the fight against human trafficking, there are clear challenges to the achievement of victory over human trafficking in Nigeria. One major challenge is the funding gap in the counter trafficking programme. NAPTIP is almost always cash-strapped and seeking financial assistance from donor agencies (Omogbolagun, 2022). Other security agencies face the same situation with limited budgetary allocation and inadequate operational funds and are therefore unable to operate at full capacity. Thus, paucity of funds constitutes a heavy ball and chain that hamstring the max-

imization of the benefits of inter-agency cooperation in the fight against human trafficking in Nigeria (Tukura & Tukura, 2024).

Corruption and official complicity also contribute to the frustration of the success of multi-agency partnership in the counter trafficking campaign. There have been reports of officials at border posts being compromised by perpetrators of transnational crimes (including human trafficking) in order to permit the commission of a crime. For example, the U.S. State Department reported that in 2024, two officials of NAPTIP were convicted in Nigeria for being complicit in trafficking offences.⁴¹ The same source also reported cases of sexual exploitation of IDPs by camp officials and the recruitment of child soldiers in IDP camps by camp officials and members of the Civilian Joint Task Force (CJTF) in the crisis-ridden North East. These ugly incidents tend to erode confidence in and undermine inter-agency collaboration in combatting human trafficking.

Lack of adequate training is another militating factor in fostering inter-agency partnership. This could be a function of insufficiency of funds to carry out the necessary professional development of personnel. There is lack of uniformity in the standard of training among the different agencies involved in anti-trafficking activities thus creating a disparity in skill sets available to each agency.

Traffickers have leveraged the opportunities afforded them by the internet while law enforcement is largely analogue. This keeps the traffickers one step ahead of law enforcement. Sub-optimal utilization of technology is a challenge to inter-agency partnership in the fight against human trafficking. The heavy reliance on human interference in inter-agency collaboration can contribute to the corruption and compromise of the system (Innocent, 2017).

5. Recommendation

This paper proffers the following solutions to address the identified challenges. On the question of inadequacy of funds, it is suggested that the State should increase its budgetary allocation to the anti-trafficking effort. NAPTIP should continue its fund-raising drive from donor agencies and public-spirited individuals and organizations. While the TIPPEA has created the Victim of Trafficking Trust Fund, it is not an operational fund. It is therefore suggested that new sources of funding for operations be sought and explored. Sister agencies like the police should also have dedicated budgets for their anti-trafficking units.

On the challenge of corruption, it is recommended that every agency or unit engaged in anti-trafficking duties must be made to maintain an anti-corruption desk and where possible, automation of as many inter-agency processes as possible should be considered. Automating inter-agency protocols will not only improve efficiency but will also address the question of corruption.

This paper further suggests that resources should be allocated for the training and re-training of anti-trafficking personnel of all the agencies concerned in the

⁴¹Department of State, 2024 Trafficking in Persons Report: Nigeria, <https://www.state.gov/reports/2024-trafficking-in-persons-report/nigeria/>, accessed December 1, 2025.

anti-human trafficking campaign. Where possible, personnel of all agencies and units fighting human trafficking should receive their anti-trafficking training in a central institution in order to engender uniformity in the standard of skills and competence each of them possesses. NAPTIP as the coordinating agency should assume the lead in the training of the staff of sister agencies engaged in the counter-trafficking effort.

The legal framework for combating human trafficking in Nigeria is adequate for its purpose. It has created synergy and partnership among the various agencies engaged in counter-trafficking. The prospects of inter-agency cooperation are bright. The implementation of the suggestions made in this paper would complement the practical aspect of that legal framework.

6. Conclusion

The objective of this paper was to examine the legal framework for combating human trafficking and see the influence of inter-agency partnership in the achievement of the aims of that fight. The paper found that the legal framework for fighting human trafficking in Nigeria comprises Nigeria's international obligations principally represented by the Palermo Protocol and local statutes especially the TIPPEA. The adequacy of the legal framework is hinged on proper legislative coverage through amendment of the related laws which will also address the implementation weakness. While the various agencies involved in the fight against human trafficking have exhibited an inclination towards cooperation and partnership with one another, there are systemic and structural challenges that tend to limit the full realization of the aims of the campaign. These include paucity of funds, inadequate training, corruption, etc. The paper has made useful suggestions for the achievement of the aims of the war effort against human trafficking in Nigeria through inter-agency cooperation.

Conflicts of Interest

The author declares no conflicts of interest regarding the publication of this paper.

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