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Accountability and Anti-Corruption Institutions in Ghana and Nigeria: A Neo-Patrimonial Reading of Formal Design and Informal Constraint

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Abstract: The question of why anti-corruption bodies have mushroomed in Ghana and Nigeria, but not in terms of their effectiveness of enforcement is addressed. It hypothesizes that the Ghanaian Office of the Special Prosecutor (OSP) and the Nigerian Economic and Financial Crimes Commission (EFCC) are dual-purpose bodies which are structurally bound up in informal elite bargains over when to conduct rational-legal administration on politically connected targets. Here, the paper looks at three aspects: selective prosecutorial treatment of the two commissions, failure to implement the two whistleblowing protection regimes (Ghana's Whistleblower Act and Nigeria's non-statutory whistleblowing policy) and the disconnect between technical quality of the two supreme audit reports and weak follow-up by the parliamentary Public Accounts Committee in both countries. Available case evidence indicates that formal autonomy and the extent of the mandate are weak predictors of enforcement results in both countries based on available case evidence: the closer the ruled party is politically to the ruling party, the lower the chances of enforcement. This is because, in addition to Meyer and Rowan's notion of organizational isomorphism, there is a concept of donor-driven institutional isomorphism, which can account for the formal isomorphism of the anti-corruption architecture between the two countries without resulting in full isomorphism. The paper concludes that reforms to build or consolidate institutions will be unlikely to lead to an effective change without at least ensuring that key chokepoints (case selection discretion, whistle-blowing enforcement, and the authority of the Public Accounts Committee) are no longer directly controlled by politicians and recommends the use of this hybrid-function analysis to other cases in West Africa.

Keywords: Neo-patrimonialism, anti-corruption institutions, Ghana, Nigeria, institutional decoupling, accountability.

INTRODUCTION

Ghana and Nigeria have created a growing network of anti-corruption structures, such as dedicated prosecution commissions, whistleblower laws and supreme audit institutions mandated by the constitution since the early 2000s. But perceptions of corruption and governance scores of the two countries have not been significantly different in the same period: Ghana's Transparency International Corruption Perceptions Index score is the same since 2020 (43/100), while Nigeria's has not budged from 26/100 (142nd of 182 countries listed on the latest index), and confidence in institutions that would monitor the behavior of elites is fragile (Transparency International, 2026; GNA, 2025). This persistence poses an analytical problem for the conventional institutional systems of principal-agent or other accountability mechanisms, whose emphasis is on the results of auditing, protective and investigatory roles: Bodies with such protective, investigatory and auditing roles have little effect on powerful elites.

Drawing on a neo-patrimonial lens, in this study the anti-corruption institutions in Ghana and Nigeria are not simply dysfunctional or deceptive institutions, or merely organs of authoritarian regulation, but are rather multiple-institutional entities, which simultaneously engage in actual rational-legal administrative processes, and are also open to informal elite bargains that govern their ability to carry them out. Each is explored separately, including the issue of selective prosecution by anti-corruption commissions, the failure to ensure the protection of whistleblowers and the failure to follow up on a good audit report through legislation. Ghana's Office of the Special Prosecutor (OSP) and Nigeria's Economic and Financial Crimes Commission (EFCC) are the paired case studies in the study. The two were selected due to their unique institutional characteristics (the OSP is a newer, more narrowly prosecutorial unit, while the EFCC is an older, more broadly investigative unit) and because they have experienced similar trends in their enforcement in politically charged cases, allowing them to be analyzed in a structured manner in the region instead of a wide regional sweep.

Theoretical Framework: Neo-Patrimonialism and Dual-Purpose Institutions

Neo-patrimonialism is seen in the governance literature in Africa as a political system in which rational-legal bureaucratic institutions are entrenched and eventually displaced by personal networks of loyalty and patronage. Bratton and van de Walle (1994) have suggested a simple model of a blend of the formal features of a

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modern, bureaucratic state with a substandard, logistical understructure in which office becomes a vehicle for meeting client demands, not a impartial public service. This perspective has been expanded since then into a detailed comparative study on regime change in Africa (Bratton and van de Walle, 1997). Unlike pure patrimonialism, the neo-patrimonial state takes the shape of the Weberian bureaucracy, with its legal codes, independent agencies, competitive appointments, etc., which can provide some degree of internal and external legitimacy, a purely personalist state would not be able to sustain by itself.

An archetypical example of this paradox is anti-corruption institutions. These are not just window dressing and proper means of autonomous power control, but they exist on a continuum, and the daily situation of which is not fixed as much by the law as by the calculation of the elites. The approach thus leads to the paper's main testable prediction that the intensity of enforcement and institutional independence will be systematically related to political distance of the target, not formal power of an institution's legal authority. While acknowledging that neo-patrimonialism is not a pan-continental phenomenon, Mkandawire (2015) also warns the reader against dismissing the phenomenon because it is viewed as some form of non-existent rule of law, he contends that the phenomenon is a reality on the ground in the continent and therefore, cannot be boiled down to either a rule of law or no rule of law.

It helps to differentiate between two neighboring frames and neo-patrimonialism. The standard principal-agent theory perspective applies to the lack of enforcement as a monitoring or incentive issue, which in principle could be resolved through improved contract design, sanctions or reporting lines. But it can't account for the fact that well-constructed institutions in Nigeria and Ghana are not doing well when they have adequate monitoring resources. This is because it does not have a natural home for a political principal who gains from the agent's selective inaction. A positive institutional economics critique of the principal-agent framework is similar: A fundamental assumption of the principal-agent framework is that there is an honest principal who can punish the agents, but when the corruption is systemic and not exceptional, this assumption is as problematic as the standard one that agents are corrupt: If everyone defied the "free-ride" principle, then no one would be punished, so no one would have an incentive to be first. The paper treats each of the three chokepoints identified here, not the mandate of each of the institutions under consideration as a whole, as its unit of analysis, so it is helpful to have a more operational statement of this same point as made by Klitgaard in 1988: corruption occurs when there is a lack of accountability, monopoly, and discretion within a given institution. This is more appropriate because in institutionalized environments, organizations might need to have formal structures if they need to be legitimate, but they could deviate in practice because if the formal structure was tightly coupled with practice, they would have conflicts in which they would not have the power to solve. Neo-patrimonialism, however, is more specific, indicating who benefits from the detaching and why: in the Ghanaian and Nigerian context, the easy 'maintenance of institutional myth' refers to the systematic and systematic withdrawal of the formal anti-corruption institutional structure from its stated role, that of enforcing the rule of law, to the benefit of a network of rulers.

These must be offset by two other sets of scholarship. In this 'politics of the belly' (Bayart 1993), there is no formal versus informal divide in Africa: there are no separate separate spheres and political actors understand they are deliberately located between the formal and informal political, between the state and the shadow economy. A further step, Chabal and Daloz (1999) argue, is to accept that there is nothing wrong with an absence of order in African political systems; indeed, they are a feature used by ruling elites to make space for manoeuvre. The present paper does not necessarily claim equality with the Bayart and Chabal and Daloz: that it examines, or generalises from, the reproduction of elite power at the level of the state. Instead, it covers a more constrained and testable aspect of the reproduction of elite power in a subset of three choke points in the formally rational-legal anti-corruption structures. If we take the instrumentalization-of-disorder thesis as presented here then we should find consistency and drift in the whole of public administration in Ghana and Nigeria; if the instrumentalization-of-disorder thesis is taken to mean that there is a patterned and testable consistency and drift in public administration that is politically proximal, then we should be able to find it at the case level rather than at the regime level.

Another contrast is anthropological, in which a third tradition can be considered. West African corruption is socially legitimate in the sense that it

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is sanctioned by the 'logics' of gift-giving, solidarity and, hence, redistributive obligation. It is not locally recognized as 'wrongdoing' like the formal law because of this. (Olivier de Sardan, 1999). This moral-economy account should not be confused with, but is compatible with, the argument advanced in this paper, which is most likely to be relevant to situations of high-value graft and the politically connected, where gift-exchange as a "deliberate" bargain is unlikely to be a plausible cover story and where a more plausible story, if one exists, would be a "deliberate" bargain with the political class.

METHODOLOGY

This paper takes a structured, most-similar-systems comparative case study approach that in advance sets aside a number of competing arguments (the former colonial legal tradition and reliance on colonial aid for the OSP in Ghana versus the EFCC in Nigeria) and leaves others in place for comparison: the impact of the difference in institutional pedigree, described above, between the OSP and the EFCC. Evidence is derived from three categories of sources (enabling statutes, constitutional provisions, and the Public Expenditure and Financial Accountability (PEFA) assessments), whenever possible triangulated against each other, and from news reporting from Ghanaian, Nigerian and pan-African newspapers and other media outlets for 2020-2026, to establish a sequence and the status of events that are unresolved. The three parts (commissions, whistle-blower systems, and audit follow-through) are analyzed inductively, and the analysis of the cross-cutting section allows for the determination of whether the same structural logic emerges across sites. As it is not based on original interviews or survey information, the results of this study should be viewed as an institutional-design analysis of the public record; they cannot be considered evidence of the motives of individual officials.

Anti-Corruption Commissions as Administrative and Political Instruments

Ghana's Office of the Special Prosecutor (OSP) was set up under the Office of the Special Prosecutor Act, 2017 (Act 959) (Ghana, Republic of, 2017) and started operations in January 2018 with statutory prosecutorial independence and security of tenure for its head. But there is a tension in the structure of the Act itself as it places the Special Prosecutor's exercise of authority in relation to the Attorney-General's constitutional prosecutorial power under article 88 of the Constitution, 1992 (Republic of Ghana). Ever since, this conflict has been openly expressed as a constitutional struggle. Ghana's first Special Prosecutor (SP) Martin Amidu resigned in November 2020 over allegations of "political interference" while the independence of the Special Prosecutor was challenged in court by the Supreme Court, which accepted fourteen civil society organisations to intervene on his behalf. The Court unanimously (7–0) ruled the constitutionality of the OSP's independent prosecutorial power in Act 959 while also affirming the Attorney-General's separate constitutional power to nolle prosequi (JURIST, 2026; MyJoyOnline, 2026). Similarly, in Ghana a study comprising of a series of interviews with CSO, media, informants from OSP and Public Accounts Committee showed that the OSP has been hampered by political interference in its operations despite the fact that it has a formal legal personality and it seems direction and control has not yet been established (Amagnya and Akinlabi, 2022).

The OSP's treatment by the critics is like the EFCC's in Nigeria. Although the EFCC was established by an Act of the National Assembly of Nigeria 12 December 2002, it had some deficiencies that were exposed in the founding act, so the National Assembly repealed the existing act and re-enacted the mandate of the EFCC in the EFCC (Establishment) Act, 2004 (Nigeria, Federal Republic of, 2002, 2004), effective today. The EFCC is more powerful than the OSP in its investigative powers and has a longer history as an institution as well. In its detailed history of the EFCC, which is now available, Human Rights Watch (HRW, 2011) has documented the impressive prosecutorial achievements of the first chairman, Nuhu Ribadu, who was soon to be swept from office by evidence showing that his political agenda was that of then President Olusegun Obasanjo. Recent research has revealed a pattern of investigators focusing more intently on out-of-favor opposition figures and officials and even halting investigations when the person accused turns "bad," or less onerously, when the accused becomes politically more friendly to the incumbent government (Human Rights Watch, 2011). The allegation challenged the EFCC's approach towards opposition governments in the states, as it got resurfaced as late as 2026 (Nairametrics, 2026; AllAfrica, 2026), which showed that it was not just any of these

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governments, but the structural position of the EFCC in the country.

Investigating the funding methods, appointment procedures and protections from dismissal of the two commissions reveals the poor correlation between formal independence and actual independence in practice. Both agencies are serious little bureaucracies when the low stakes and mid-grade and/or unconnected offenders are at play; both are successful in getting convictions and assets as mandated by statute. Both, however, tend to fall back on the patronage logic when it comes to the foundation of the ruling network's loyalty, by either overloading dockets or freezing discretionary accounts, or ousting a lone commission head. Under this one, commissions do not necessarily have to be as wide-ranging as they can be but should be as close to the patronage middle as possible and therefore effective. This is more of a testable dimension than the aggregate measure of governance, since it suggests a prediction for each of the cases, namely that the intensity of enforcement should be lower the closer to the political sphere.

Table 1 below provides a summary of the comparisons above. There is an extreme difference between the formal design but the bottom row of the table shows that the two institutions are getting closer and closer to the same behavioral pattern in the paper's primary empirical finding that enforcement outcomes do not vary between the OSP and the EFCC, formal design does.

Table 1. Institutional design and enforcement pattern: OSP (Ghana) and EFCC (Nigeria)

Dimension	**Office of the Special Prosecutor (Ghana)**	**Economic and Financial Crimes Commission (Nigeria)**
Establishing instrument	Office of the Special Prosecutor Act, 2017 (Act 959)	Act of the National Assembly, December 2002; re-established under the EFCC (Establishment) Act, 2004
Operations began	January 2018	2003
Institutional scope	Relatively recent, narrowly prosecutorial creation	Older, wider investigatory agency
Relationship to executive authority	Section 4(2) situates the Special Prosecutor's exercise of authority in relation to the Attorney-General's constitutional powers under article 88 of the 1992 Constitution	Documented alignment of enforcement agenda with the sitting president's political preferences under the first chairman (Human Rights Watch, 2011)
Disruption to head's tenure	First Special Prosecutor Martin Amidu resigned in November 2020, citing political interference	First chairman Nuhu Ribadu removed from office shortly after pursuing a governor aligned with the incoming administration
Most recent controversy (as of 2026)	Supreme Court unanimously (7-0) upheld OSP's constitutional independence, 29 July 2026, after fourteen civil society organizations intervened	Allegations of selective treatment of opposition-aligned state governments
Observed enforcement pattern	Routine bureaucratic function in low-stakes or politically unconnected cases; discretionary constraint once a case reaches the ruling coalition's core	Same pattern: routine bureaucratic function in low-stakes or politically unconnected cases; discretionary constraint once a case reaches the ruling coalition's core

Whistleblower Protection Frameworks and the Limits of Statutory Cover

The Whistleblower Act, 2006 (Act 720) (Ghana, Republic of, 2006) is cited as one of the strongest whistleblower laws in Africa that includes confidentiality and a reward system as well as protections against retaliation. The disclosure can be made by various factors such as the Attorney-General, Members of Parliament and the Commission on Human Rights and Administrative Justice who are responsible for the administration of the Act (PPLAAF, n.d.). On the other hand, Nigeria has no law of the kind - its whistleblowing policy was approved by the Federal Executive Council in December 2016, but never passed by the National Assembly, and so lacks in statutory strength or enforceability; being in the policy, only the whistleblower's identity is protected, not his employment or personal security, as is the case in section 27 of the ICPC Act (TheCable, 2026a; TheCable, 2026b). Nigeria signed the African Union Convention on Preventing and Combating

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Corruption in 2006, which mandated the creation of an informer and witness protection programme, but has not done so, almost 20 years after Ghana enacted its law containing the clauses (TheCable, 2026b).

Despite comparatively strong statutory frameworks, like Ghana's, research on implementation shows that the informal sanctions (reassignment, delayed promotion, professional isolation, social stigma) faced by whistleblowers in the public sector are not formally prohibited, but still occur (GNA, 2025; D+C, 2016). Conceptual analyses of the Act define some structural weaknesses that make this gap worse: whistleblowing is restricted to six clearly defined categories of wrongdoing, the Act does not provide any employees who refuse to obey illegal orders with any protection, and it does not provide any protection for those who are merely suspected of being whistleblowers or their associates, and it does not provide for the full anonymity of the disclosure (Ndebugri and Senzu, 2018). Neither Ghana nor Nigeria has an independent enforcement authority outside of the political hierarchy that the whistleblower is reporting on, to deal with whistleblower accusations. This leaves the protection to whoever is committing the violation.

This gap has been better understood in the light of neo-patrimonialism, rather than as a failure of oversight on the part of the legislature. This would risk undermining the networks of patronage within the establishment apparatus which the official fight against corruption claims to be controlling but is damaging. If the whistleblower statute actually worked as it is supposed to, there would be too much and too much of the right type of disclosure coming from within the commissions and the audit bodies downstream would have to work too much and too hard, if they could, and if it was politically expedient in the right cases. In the context of the dual-purpose system, the chilling effect is important because it ensures that the volume of disclosures is kept to a minimum so that the commissions' discretionary case selection remains manageably administrative, and the statute satisfies the donor and international-legitimacy requirements that gave rise to its creation in the first place.

Audit Institutions: Independence in Findings, Dependence in Follow-Through

The Ghana Audit Service (established by article 187 of the Constitution of Ghana, 1992 and the Audit Service Act, Act 584 of 2000, Ghana) regularly produces high quality technical annually reports on specific financial irregularity in Ministries, Departments and Agencies (MDAs), while the Office of the Auditor-General for the Federation, Nigeria, (established by section 85 of the Constitution of the Federal Republic of Nigeria, 1999) also produces high quality annual reports on financial irregularity. The World Bank (2024) rated Ghana's SAI as C (8.0–8.5 out of 10) for independence in 2021, a grade that dropped to D (6.5 out of 10) in 2023–2024, reflecting moderate and decreasing independence on the World Bank's technical assessment. Poor internal controls and capacity constraints as well as delayed response to audit queries in federal ministries have been consistently highlighted by the Auditor-General for the Federation in Nigeria, although the downstream effects of the findings have not yet been far-reaching (Guardian Nigeria, 2026b).

For both systems, there is a system of follow-up provided for under the constitution, namely the Public Accounts Committee (PAC) in the legislature. Is it is constantly inadequate in comparison with the amount and focus of what the audit function produces. The Ghana Audit Service (GAS) findings were also submitted to the Public Accounts Committee (PAC) which was again found to be in the process of reviewing the recommendations in 2017, meaning that a follow-up to the recommendations is taking four to five years, Ghana's PEFA assessment showed in 2018 (World Bank, 2024). The situation is even worse in Nigeria: historically the National Assembly receives audit reports three to four years after the end of the financial year under audit, with the report submitted in 2022 being received in the National Assembly only in early 2026 and a bill that seeks to create binding timelines for the receipt of audit reports is pending presidential assent as of early 2026 (Guardian Nigeria, 2026a). The Public Accounts Committee of Nigeria (PAC) has also griped that many agencies are not interested in coming to the committee or in presenting their audited accounts. In February 2026, for example, it recommended that 23 federal agencies have no budget, since they have consistently been failing to account for public funds. A strong sanction but one that reinforces that non-compliance with audit follow through is a common occurrence (Punch, 2026c).

It establishes a "documentation without consequence" that the results of the audit are

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technically correct, that they are available in the public record, and that they generally do not lead to any disciplinary, legal and/or political action against the officials revealed by the results of the audit. A part of the blame for this lag is put on under funding and capacity limitations, as the House of Representatives Public Accounts Committee (PAC) in Nigeria had earlier complained that the proposed allocation of the Auditor-General's office to about 0.027 per cent of the federal budget was insufficient for the size of the oversight job (Gazette NGR, 2026; Premium Times, 2026). Neo-patrimonialism offers an explanation for this imbalance, by distinguishing between the audit function, which is largely technocratic and therefore could be conducted with independence (in that there were no direct sanctions involved), and the follow-through function, which is legislative and works as part of the same patronage network that the audit is about. Where, as in the case of the legislature, the same political network is being audited, or the legislature is being audited, there's no need for the legislature to have repercussions if the same political network has filled it, because it's a natural corollary of the way things work that the legislature will have repercussions if it's used by the same political network.

Cross-Cutting Analysis: The Political Settlement as the Real Determinant of Accountability

The same basic structural element of accountability emerges in all three areas studied here: commissions, whistleblower frameworks and audit follow-through, the latter two being areas where there is a direct political interest in restricting accountability. In the commissions, case selection is that juncture, in whistleblower systems, it is the identity and political geographical location of the body that would have to implement the anti-retaliation component, and in audit institutions it is the legislative committee alone that can turn the result of the audit into a consequence. The convergence implies that the effectiveness of anti-corruption institutions is shaped more by the prevailing settlement than by institutional design in both countries; and the nature of the prevailing settlement, and the bargains that it encodes at any point in time, in both countries.

The formal similarity of the institutional design of the two countries is better accounted for by donor-induced institutional isomorphism. The international anti-corruption conventions, such as the African Union Convention on Preventing and Combating Corruption (African Union, 2003) and the United Nations Convention against Corruption (United Nations, 2003) had an impact on the OSP and the EFCC, and on the whistleblower architecture in both countries, in so far as they provided a framework for the adoption of a recognizable institutional form, whether or not that form actually works. This is in line with the overall argument of Meyer and Rowan (1977) that institutions that operate in institutionalized settings obtain legitimacy, resources and stability using structures that fit into external expectations, although these structures may be "decoupled" from the day-to-day actions of the organization. The Ghana-Nigeria comparison works because it allows for the identification of the specific political mechanism that allows for the decoupling, a mechanism that is not a diffuse organizational myth, but the concrete interest of a governing coalition in not letting the formal architecture constrain them from having discretionary control over when the formal architecture is to be respected.

The contribution of this paper is to correct the reform literature, which tends to be design-focused, and which sees weak enforcement as a sign of greater mandate, increased resources, or increased statutory independence. The Ghana-Nigeria data suggests that such reforms may have some attractions if they are not examined as to their effect on symptoms but rather the political realities that give rise to the question of whether or not any particular architecture will be allowed to function as intended in any particular situation.

Limitations

The above can be made subject to three restrictions. First, the design only compares two countries, and they have been selected for their contrast with respect to institutional pedigree, not for random or representative sampling reasons, and the fact that design returns a pattern of divergence in the former, but convergence in the latter, is a plausible, testable pattern, but not a generalizable law of West African anti-corruption institutions. In Section "Implications and Conclusion" the additional cases (Senegal and Côte d'Ivoire) are suggested to determine the extent of the pattern.

Second, the evidentiary base is mostly documentary, based on statements in statutes, constitutional provisions, audit and PEFA reports, and secondary reporting of civil society groups, human rights institutions and the media. This is

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appropriate for setting out the sequence and outcome of formal institutional procedures (the object of analysis in this paper) but it cannot access the private calculations of political and bureaucratic actors involved. If the argument assumes that the elites have an intent, such as that chilling effects on whistle-blowers have a stabilizing role in the dual-purpose system, then this should be treated as an inference from institutional behaviour and not as a documented motive.

Third, a large proportion of the Nigerian and Ghanaian sources quoted here are contemporary news from 2025 and 2026, covering issues, such as the Supreme Court case on OSP autonomy, that remain unresolved at the time of this writing. These are the most up-to-date sources available and are triangulated with primary legal sources and institutional reporting when available, but have not been subjected to the same scholarly scrutiny as the paper's peer-reviewed sources, and may be updated with the specific case details as the institutions' history is lengthened, but not with the overall structural pattern the paper identifies over a longer period of institutional history.

IMPLICATIONS AND CONCLUSION

The ability to isolate certain chokepoints (case selection discretion of the commissions, the body where whistleblower retaliation claims are prosecuted, and the autonomy of the Public Accounts Committee) from direct political control is unlikely to work without other changes, such as the establishment of additional bodies. The calls for consolidation of the OSP and the Directorate of Public Prosecutions (DPP) into a single entity under the leadership of a career civil servant and not a political appointee in Ghana and Nigeria, respectively, targeted such chokepoints as opposed to demanding breadth as such (JURIST, 2026; Guardian Nigeria, 2026a).

The chokepoint approach developed here suggests that this 'indirect big bang' thesis (Rothstein 2011), that anti-corruption reform is successful only when it changes "enough" actors to make "individually rational" defection from a corrupt equilibrium, may also hold true: relatively little use of a more independent commission if whistleblower retaliation goes unpunished, audit results remain ignored and if there is no law to protect at all. To be robust, a credible reform programme would have to remove case selection, the power of Public Accounts Committee and the enforcement of whistle-blowers together and in a way that was transparent to the political elites, so that they could simultaneously change their expectations of enforcement not at a few different points in time (as a step-by-step reform would enable) but at a few different points at once, since the two not to be touched would provide safety valves for the same underlying bargain.

Such findings have broader policy implications for broader debates on public administration reform in unstable and 'hybrid' democratic systems, where accountability institutions often have both administrative and political functions, as opposed to one or the other. The paper proposes that a larger number of cases in West Africa, and other colonial administrative experiences (Senegal and Côte d'Ivoire) be tested to determine whether this hybrid-function pattern is more widespread, or whether it is simply a more specific form of the parliamentary institutions that are common to the two West African countries and are of Westminster and common-law origin. Lastly, the analysis shows that the Ghana-Nigeria example supports a similar basic argument to that of work already done on press freedom and the public sphere in West Africa, and confirms the same principal thesis, although in a smaller institutional form: formal democratic institutions stray from their formal purpose in the face of ongoing political pressure from elites, whether the institution is a free press or a prosecutorial commission.

An initial examination of these two comparison cases indicates that the pattern does appear to be traveling. Sénégal's anti-corruption office, OFNAC, which was established in 2012 and is attached to the Presidency, has been reshaped twice in less than two years, following a 2024 law that allowed it to expand its investigation authority (such as a controversial amendment to its mandate to order police custody) before a 2025 law returned to a narrower scope, stripping it of audits and detention powers after criticism that it had encroached on ground reserved for judges and other supervisory bodies (AllAfrica, 2025a, 2025b). This oscillation is itself indicative of the chokepoint logic developed here: the ruling network seems to adjust the discretionary powers of the office from time to time according to the level of corruption charges faced by it, mirroring the repeated proposals for institutional reforms of the OSP and the EFCC. Côte d'Ivoire's Haute Autorité pour la Bonne Gouvernance (HABG), created by Loi n°2013-880 of 20 December 2013 with members appointed by the President

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(République de Côte d'Ivoire, 2013), shows a parallel structural constraint: it investigates complaints and asset declarations but must hand its conclusions to the public prosecutor, who alone decides whether to proceed, reproducing the same separation between investigatory finding and prosecutorial discretion that structures the OSP's relationship with Ghana's Attorney-General. The number of complaints received by the HABG increased from an average of 132 per year from 2014 to 2022 to 472 in 2024 (APA News, 2025), which may indicate increasing confidence among the public in the HABG or could simply be the result of a growing backlog of complaints awaiting prosecution; the three-chokepoint framework developed in this report is a tool for determining the answers to these questions. The triangulated documentary approach for Ghana and Nigeria has not been completely extended to these two countries, but this is left for future studies.

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Availability of data: Data from this study is openly available from all the sources analyzed and can be located in the reference list. No data were created but instead collected.

Ethics: This study used only documents that are publicly available (statutes, reports, constitution, institutional documentation and auditing reports, published secondary literature), which meant that there were no human participants and thus no need for ethics approval.

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