

SOUTH WEST GEO-POLITICAL ZONE • CAPACITY-BUILDING TRAINING

Public Sector Accountability, Transparency & Good Governance

Understanding the concepts, the law, and their meaning for the Public Complaints Commission's mandate

DAY 1 OF 3 — Foundations & Legal Framework



MEET THE FALICITATORS

FACILITATOR'S PROFILE

Mr. Adeniran Adebisi Dave *(IT Manager | Network & Systems Administrator | Resource Person & Facilitator)*

Mr. Adeniran Adebisi Dave is an IT Manager and Network/Systems Administrator with over 20 years of professional experience across financial institutions, healthcare facilities, and academic organizations in Nigeria. He currently serves as IT Manager at Unlimited Digitech Ltd., where he oversees IT infrastructure, cybersecurity, and disaster recovery planning for a diverse portfolio of clients, including microfinance banks, universities, and hospitals.

Beyond his technical practice, Mr. Adeniran is an experienced resource person and facilitator on public sector capacity-building programs. In November 2025, he served as Lead Resource Person for Skytech Analytic Nigeria Limited on a two-day training titled ***"Ethics, Accountability and Integrity in Public Sector Investigation,"*** delivered to 75 staff of the Public Complaints Commission (PCC), Ogun State — covering ethics and accountability, whistleblower protection, confidentiality protocols, and cybersecurity awareness. He also served as a part-time lecturer in Computer Science at Olabisi Onabanjo University Consults, teaching networking, operating systems, and data structures.

He holds a Higher National Diploma, Post-Graduate Diploma , and an MSc in Computer Science at the Federal University of Agriculture, Abeokuta (FUNAAB). He is a Cisco Certified Network Associate (CCNA), ISO/IEC 27001:2022 ISMS Foundation certified, and an active member of the Nigeria Computer Society (NCS).

Drawing on this blend of technical, institutional, and ethics-focused facilitation experience, Mr. Adeniran brings a practical, service-oriented perspective to the theme of *Accountability, Transparency and Good Governance* for PCC staff.

About This Training Programme

Public trust is the foundation on which every credible public institution stands. As the ombudsman for citizens of Ogun state and by extension all Nigeria States, the Public Complaints Commission (PCC) exists to hold public bodies accountable — which means our own staff must model the same standards we ask others to meet.

“Accountability is not an event; it is a culture that must be built, practised and defended every working day.”

1

3-Day Structure

Foundations, mechanisms in practice, then strategies, roles and case studies.

2

Who Should Attend

Zonal/State Coordinators, HODs, Finance, Procurement, Records and Field staff, and new inductees.

3

How We'll Work

Lectures, facilitated discussion, case studies, group work, role-play and a closing quiz.

Rationale & Training Objectives

RATIONALE

Set against Nigeria's ongoing public sector reforms — the Freedom of Information Act, Fiscal Responsibility Act and Public Procurement Act — and rising citizen expectations, the Commission's staff must internalise these values from procurement and finance to records-keeping and public engagement.

BY THE END OF DAY 1, YOU WILL BE ABLE TO:

- ✓ Explain accountability, transparency and good governance
- ✓ Locate the PCC's mandate within Nigeria's legal framework
- ✓ Identify the oversight bodies relevant to the Commission's work

FULL TRAINING OBJECTIVES (ALL 3 DAYS)

Explain accountability, transparency and good governance and their relevance to public service

Identify the legal and institutional framework guiding accountability in Nigeria

Describe key accountability mechanisms and how to apply them

Apply transparency tools in daily duties, including records and communication

Recognise ethical dilemmas and respond per the Code of Conduct

Identify challenges within the Commission and the South West Zone and propose solutions

Act as ambassadors of good governance in their respective states

The Public Complaints Commission: Nigeria's Ombudsman

The PCC investigates complaints of administrative injustice — unfair treatment, delay, abuse of office and maladministration — brought by citizens against government ministries, departments, agencies and parastatals. Every principle in this training exists so the Commission can hold others accountable while being visibly accountable itself.

I

Investigate

Receive and investigate citizen complaints against public bodies and officials, free of charge.

R

Recommend

Issue findings and recommend redress, correction or disciplinary action to the affected body.

S

Safeguard

Protect citizens from bureaucratic delay, arbitrariness and abuse of administrative power.

M

Model

Demonstrate the same accountability, transparency and integrity it demands of others.

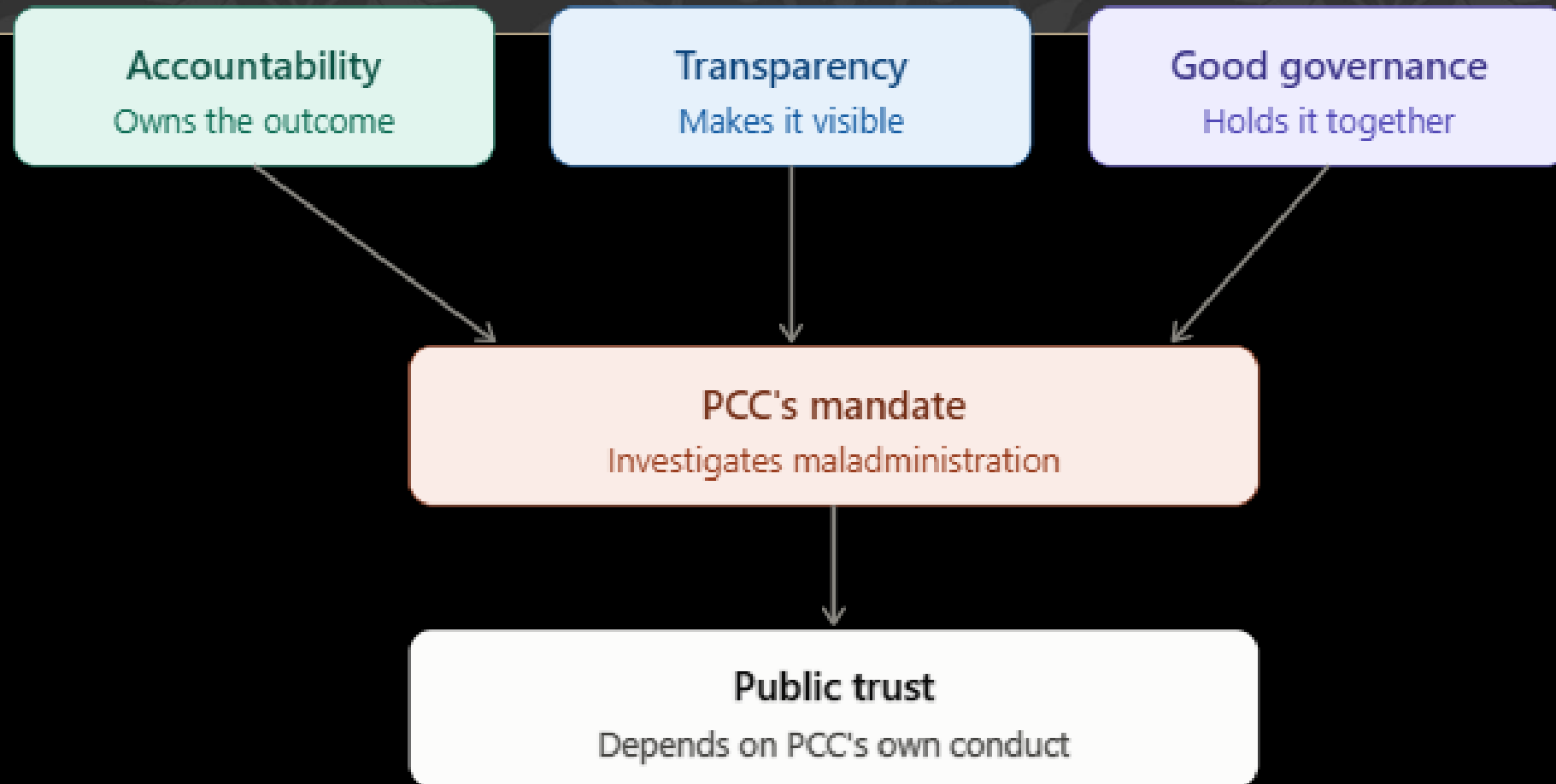
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Understanding Accountability, Transparency and Good Governance

Module 1 — Defining the concepts that underpin the PCC's work

Defining the Key Concepts

Accountability	Transparency	Good Governance
The obligation of public officers and institutions to answer for decisions, actions and use of public resources — and accept responsibility for outcomes. Three elements: answerability, enforcement, responsiveness.	Openness with which institutions conduct affairs, making decisions, processes and use of resources accessible in a timely, accurate and understandable way. It is the raw material that makes accountability possible.	Exercise of authority in managing an institution's affairs in a way that is participatory, accountable, transparent, responsive, effective, efficient, equitable, inclusive — and follows the rule of law.



The PCC enforces these values on others — and must model them itself

ACCOUNTABILITY

Accountability is the obligation of public officers and institutions to answer for their decisions, actions and use of public resources — and to accept responsibility for the outcomes. It breaks down into three working parts:

- **Answerability** — the duty to provide information and justification when asked. An official can't simply act and stay silent about why.
- **Enforcement** — the possibility of real consequences: sanctions, discipline, or correction when things go wrong.
- **Responsiveness** — the duty to actually act on findings, not just acknowledge them.

How it shows up in the PCC's daily work:

The Commission's entire mandate runs on this cycle. When a citizen complains that an MDA delayed a service or treated them unfairly, the PCC is essentially forcing *answerability* — demanding the agency explain itself. Its recommendations are attempts at *enforcement* — pushing for correction or discipline. And when it follows up to confirm an agency actually implemented a finding, that's *responsiveness* in action.

The training material frames it as a repeating cycle: **Plan** → **Act** → **Record** → **Record** → **Report** → **Review** → **Respond**. A PCC complaint moves through the same stages — logged, investigated, reported to both the complainant and the agency, then tracked to see if the outcome actually changed anything.

The catch: the PCC can only hold others to this standard if it's accountable in the same way internally — investigators explaining their findings, supervisors signing off within proper limits, the Commission itself answering for how long a case took or why a recommendation wasn't followed up. An ombudsman that can't account for its own case backlog has a much weaker position when demanding accountability from someone else.

**** how this plays out in one of the case studies from Day 3?

TRANSPARENCY

Transparency is the openness with which institutions conduct their affairs — making decisions, processes and the use of resources accessible to the public in a timely, accurate and understandable way. The training material calls it "the raw material that makes accountability possible": without access to information, citizens and oversight bodies have nothing to hold an institution accountable *for*. You can't demand answers about a decision you don't even know was made.

Two directions this cuts for the PCC:

1. Transparency it needs from others. The PCC can't investigate a complaint effectively if the agency under scrutiny won't produce records, procurement files, or a clear decision trail. Poor record-keeping elsewhere is one of the biggest practical barriers the Commission runs into — a case can stall for months simply because a department can't locate the paperwork behind a decision.

2. Transparency the PCC owes back. As an ombudsman, the PCC is itself a public institution bound by the Freedom of Information Act. It has to respond to information requests within statutory timelines, communicate findings clearly to complainants, and avoid over-classifying its own case information as "confidential" when there's no real justification for it.

Where it plays out day to day, per the training guide:

- **Records management** — accurate, complete, promptly filed, with clear retention schedules
- **FOI compliance** — timely responses, proactive disclosure of routinely requested information
- **Open data / e-governance** — publishing non-sensitive data (case statistics, performance reports) and digitising processes, which reduces discretion and creates a verifiable audit trail
- **Public communication** — clear and timely, without withholding information absent lawful justification

Common failure modes the guide flags: excessive classification of ordinary information as confidential, fear of scrutiny leading to selective disclosure, and weak feedback channels between the institution and the public it serves — all of which erode trust even when no actual wrongdoing occurred.

GOOD GOVERNANCE

Good governance is the broader frame that accountability and transparency sit inside. The training guide defines it as the exercise of authority — political, economic, administrative — in a way that is participatory, accountable, transparent, responsive, effective, efficient, equitable and inclusive, and that follows the rule of law. It's not a single value but a description of how *all* the values work together.

The guide uses the UNDP's eight characteristics as the standard framework:

1.Participation — people have a voice, directly or through legitimate institutions

2.Rule of law — fair legal frameworks, impartially enforced

3.Transparency — decisions and information are accessible

4.Responsiveness — institutions serve people within a reasonable timeframe

5.Consensus orientation — mediating differing interests toward the public good

6.Equity and inclusiveness — everyone has a fair shot at improving their well-being

7.Effectiveness and efficiency — results, achieved with resources well used

8.Accountability — decision-makers answer to the public and to institutional stakeholders

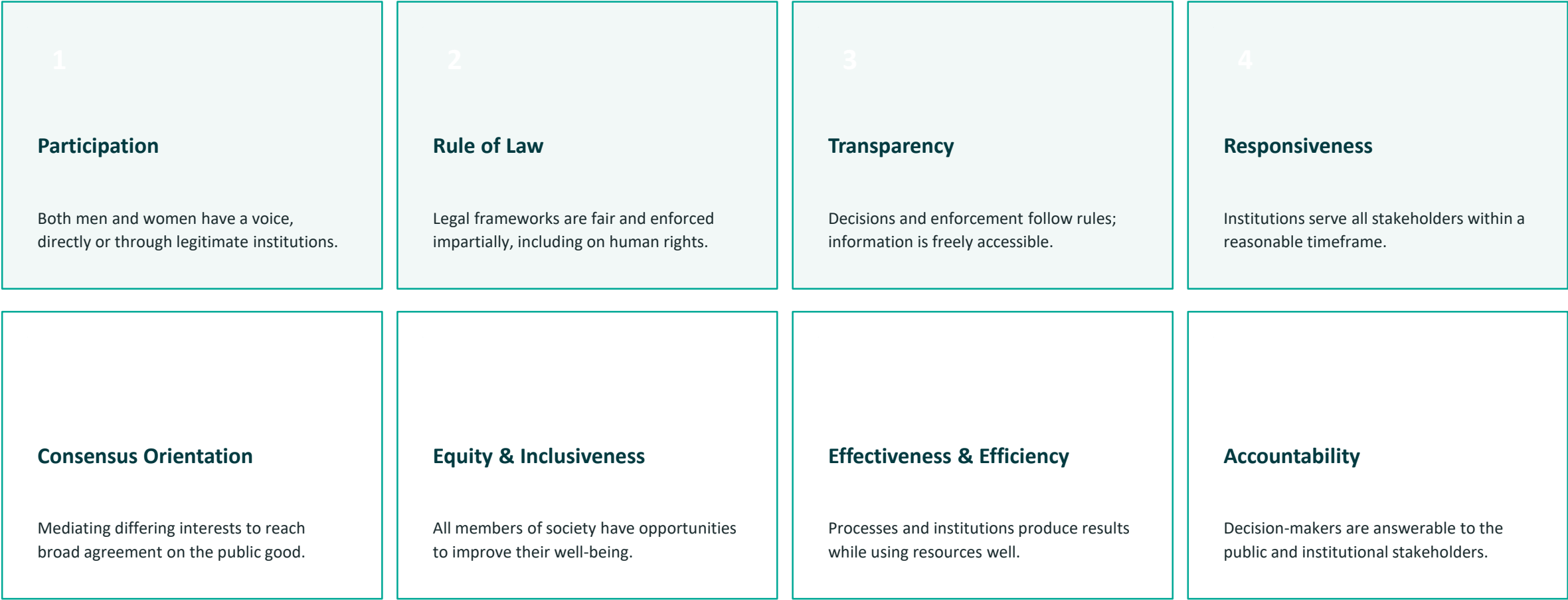
Notice accountability and transparency are *inside* this list — they're two of the eight ingredients, not separate from good governance. That's the real relationship: accountability and transparency are the specific mechanisms; good governance is what you get when all eight are functioning together.

How this maps onto the PCC's mandate specifically:

The PCC exists because good governance breaks down somewhere in the machinery of government — a citizen isn't heard (participation fails), a process is unfair or arbitrary (rule of law or equity fails), an agency won't respond (responsiveness fails). Every complaint the Commission investigates is, at bottom, a report that one of these eight characteristics didn't hold up in a specific case. The PCC's job is to diagnose which one failed and push for correction.

That's also why the training guide stresses zone-specific variation — Lagos and rural Ekiti don't have equal internet connectivity, staff capacity, or access to oversight bodies, so "effectiveness and efficiency" can look different in practice across the six states even when the standard is meant to be uniform.

The Eight Characteristics of Good Governance



Why These Values Matter for the Commission

Across the six states of the South West, these values are not abstract ideals. Weakness in any one area — for example poor records-keeping or a delayed FOI response — can undermine the credibility of the entire Commission, no matter how well other functions are performed.

REFLECTION QUESTIONS

- How would you distinguish accountability from transparency, in your own words?
- Which of the eight characteristics is weakest in your department, and why?

Public Confidence

The credibility of the Commission's findings depends on being seen to hold itself to the same standard.

Institutional Credibility

Consistent application of these values across all six states protects the PCC's reputation as ombudsman.

Ability to Investigate

A Commission with weak internal governance has less moral authority to investigate others.

02

Legal and Institutional Framework in Nigeria

Module 2 — The laws and bodies that shape the PCC's mandate

Key Legal Instruments

Instrument	Relevance to Commission Staff
1999 Constitution (as amended)	Establishes state policy on transparency and rights to fair hearing and access to justice.
Freedom of Information Act, 2011	Guarantees public access to records; imposes a duty to proactively disclose certain information.
Public Procurement Act, 2007	Due process, competitive bidding and transparency in procurement of goods, works and services.
Fiscal Responsibility Act, 2007	Prudent resource management and accountability in budget preparation and execution.
ICPC Act, 2000	Criminalises bribery and abuse of office; empowers ICPC to investigate and prosecute.
EFCC (Establishment) Act, 2004	Empowers EFCC to investigate financial crimes, including diversion of public funds.
Code of Conduct Bureau & Tribunal Act	Prescribes the Code of Conduct, including asset declaration and conflict-of-interest rules.

Institutional Oversight Bodies

1 Independent Corrupt Practices and Other Related Offences Commission (ICPC)

2 Economic and Financial Crimes Commission (EFCC)

3 Office of the Auditor-General of the Federation / State Auditors-General

4 Public Accounts Committees, National Assembly & State Houses of Assembly

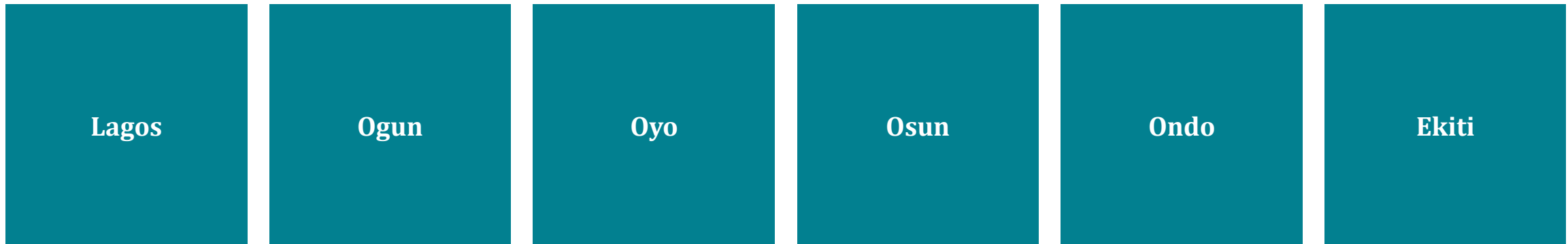
5 Bureau of Public Procurement (BPP) and State Due Process Offices

6 Code of Conduct Bureau (CCB)

7 Civil society organisations and the media, as informal accountability actors

Relevance to the South West Zone

Each state — Lagos, Ogun, Oyo, Osun, Ondo and Ekiti — maintains its own anti-corruption and due process agencies, State Auditor-General offices, and Public Procurement Laws. Staff posted to state offices must know both the federal instruments already covered and the relevant state-level frameworks, because the Commission's zonal and state operations must comply with both.



Zonal coordination should ensure every state office maintains a consistent minimum standard of accountability and transparency practice — regardless of local capacity constraints.

DAY 1 — KEY TAKEAWAYS

Foundations Are Set

- 1** Accountability, transparency and good governance are distinct but interdependent concepts.
- 2** The PCC's mandate as ombudsman rests on the same values it enforces in other public bodies.
- 3** Nigeria's legal framework — FOI, Procurement, Fiscal Responsibility, ICPC and EFCC Acts — defines both obligations and protections for staff.
- 4** Tomorrow: how these principles operate day-to-day, through accountability mechanisms, transparency tools and the Code of Conduct.