

Accountability in Practice: Mechanisms, Tools & Ethics

How the PCC's accountability cycle, transparency practices and Code of Conduct operate day to day

DAY 2 OF 3 — Mechanisms, Transparency Tools & Ethics

Recap: Day 1 Foundations



Concepts

Accountability, transparency and good governance — distinct, interdependent.



The PCC's Mandate

Ombudsman role: investigate complaints of maladministration against public bodies.



Legal Framework

FOI Act, Procurement Act, Fiscal Responsibility Act, ICPC & EFCC Acts.



Oversight Bodies

ICPC, EFCC, Auditor-General, BPP, CCB, Public Accounts Committees.

Today: how these principles are operationalised through everyday mechanisms, tools and ethical practice.

03

Accountability Mechanisms in Practice

Module 3 — The internal and external systems that keep the PCC honest

Internal & External Accountability Mechanisms

INTERNAL

- Internal controls: segregation of duties, authorisation limits, approval workflows
- Internal audit and risk management functions
- Performance management: appraisals, work plans
- Standard Operating Procedures and departmental manuals
- Supervisory reporting lines and management reviews
- Grievance and disciplinary mechanisms

EXTERNAL

- External audit by the Office of the Auditor-General
- Legislative oversight through Public Accounts Committees
- Judicial review and litigation
- Media scrutiny and investigative reporting
- Citizen feedback, petitions and complaints mechanisms — town halls, public hearings
- Freedom of Information requests from the public and civil society

The Accountability Cycle

A useful way to understand accountability in daily operations. Every staff member has a role at each stage.



From ensuring plans and budgets are realistic and documented, to keeping accurate records, submitting timely reports, participating honestly in reviews, and responding constructively to findings — including implementing audit recommendations.

PCC LINK

The Commission's own complaint-handling follows this same cycle: a complaint is logged (Record), investigated (Act), findings are reported to the complainant and the affected body (Report), and outcomes are tracked (Review, Respond).

04

Transparency Tools and Practices

Module 4 — Everyday habits that keep the Commission open to citizens

Practical Transparency Practices for Staff

Area	What Good Practice Looks Like
Records Management	Accurate, complete, promptly filed records; clear retention and disposal schedules.
Procurement	Open advertisement, standard bidding documents, documented evaluation, transparent awards.
Budgeting & Expenditure	Prepared on schedule, reconciled regularly, available to oversight bodies.
FOI Compliance	Timely, accurate responses within statutory timelines; proactive disclosure.
Public Communication	Clear, accurate, timely communication; no withholding without lawful justification.
Technology / E-Governance	Digital platforms for service delivery and reporting reduce discretion, increase traceability.

Open Data, E-Governance & Common Barriers

OPEN DATA & E-GOVERNANCE

Where feasible, the Commission should publish non-sensitive operational data — procurement plans, budget performance, service delivery statistics — in accessible formats. Digitising applications, complaints handling and record-keeping reduces opportunities for discretion and manipulation, and creates a verifiable audit trail supporting both transparency and accountability.

COMMON BARRIERS TO TRANSPARENCY

- Excessive or unjustified classification of ordinary information as “confidential”
- Poor record-keeping, resulting in inability to produce requested information
- Fear of scrutiny leading to withheld or selective disclosure
- Weak feedback channels between the Commission and the public
- Inadequate staff capacity in information management systems

05

Ethics, Integrity & the Code of Conduct for Public Officers

Module 5 — Personal integrity as the foundation of the PCC's credibility

Core Ethical Principles for Public Officers

Integrity

Consistently acting honestly and in line with public service values, whether or not one is being observed.

Objectivity

Making decisions based on merit, evidence and relevant considerations, free of bias or improper influence.

Selflessness

Acting solely in the public interest, not for personal, family or financial gain.

Confidentiality with Accountability

Protecting sensitive information while remaining accountable for decisions and actions.

Diligence & Professionalism

Carrying out duties competently, promptly and with due care.

Conflict of Interest, Gifts & Gratification

CONFLICT OF INTEREST

Arises where a staff member's private interest — financial, familial, or otherwise — could improperly influence, or appear to influence, official duties. Common examples: procurement decisions involving a relative's company, accepting gifts from vendors, or moonlighting in conflicting roles.

Declare it to your supervisor and recuse yourself from the affected decision.

GIFTS, GRATIFICATION & BRIBERY

The ICPC Act criminalises the offer, solicitation or acceptance of gratification connected to official duties. Staff should decline gifts, favours or hospitality that could be perceived as an attempt to influence official decisions.

Report any solicitation or offer of bribery to appropriate internal channels or law enforcement immediately.

Whistleblowing & Asset Declaration

Whistleblowing

Staff who become aware of corruption, financial malpractice, abuse of office or other wrongdoing have a right — and often a professional obligation — to report through appropriate channels. The Federal Whistleblower Policy protects against victimisation and, in qualifying cases, rewards reports that lead to recovery of public funds.

Asset Declaration

Public officers, including designated Commission staff, must declare assets and liabilities under the Code of Conduct Bureau and Tribunal Act — upon assumption of office, periodically thereafter, and upon leaving office. This supports transparency around personal enrichment and underpins investigation of unexplained wealth.

DAY 2 — KEY TAKEAWAYS

Principles Into Practice

- 1** Internal and external mechanisms work together — controls, audit, oversight, citizen feedback.
- 2** The Accountability Cycle (Plan → Act → Record → Report → Review → Respond) mirrors the PCC's own complaint-handling process.
- 3** Transparency is built through everyday habits: records, procurement, FOI compliance, e-governance.
- 4** Ethics and the Code of Conduct — integrity, conflict of interest, gifts, whistleblowing, asset declaration — protect both staff and the Commission's credibility.
- 5** Tomorrow: challenges, strategies, roles by cadre, and real-world case studies for discussion.