

SOUTH WEST GEO-POLITICAL ZONE • CAPACITY-BUILDING TRAINING

Living the Mandate: Challenges, Strategies & Roles

Confronting real barriers, committing to action, and applying the PCC's mandate to real scenarios

DAY 3 OF 3 — Challenges, Strategies, Roles & Case Studies

Recap of Day 2 • Modules 6, 7, 8 & 9, plus Evaluation and Conclusion

Recap: Day 2 Mechanisms & Ethics



Mechanisms

Internal controls and audits, plus external oversight and citizen feedback.



The Accountability Cycle

Plan → Act → Record → Report → Review → Respond.



Transparency Tools

Records, procurement, FOI compliance, e-governance.



Ethics & Code of Conduct

Integrity, conflict of interest, gifts, whistleblowing, asset declaration.

Today: the barriers that get in the way, the strategies that overcome them, and how it all applies to your specific role.

06

Challenges to Accountability and Transparency

Module 6 — What gets in the way, and where the South West Zone differs

Common Challenges

Weak enforcement of existing laws and sanctions, creating a culture of impunity

Poor records management and inadequate management information systems

Inadequate staff training on governance standards and their practical application

Bureaucratic bottlenecks that create incentives for informal or corrupt shortcuts

Political interference in administrative and procurement decisions

Low public awareness of rights under the FOI Act

Resource constraints limiting internal audit, monitoring and evaluation capacity

Fear of victimisation discouraging whistleblowing and open reporting

Zone-Specific Considerations

Operating across six states with differing administrative cultures, staff strengths and infrastructure — from highly urbanised Lagos to more rural contexts in parts of Ekiti, Ondo and Osun — zonal offices should anticipate variability in three areas:

Record-Keeping Capacity

Varies with staff strength and administrative infrastructure across states.

Internet Connectivity

Affects the rollout of e-governance tools in more rural operational contexts.

Access to Oversight Institutions

State-level anti-corruption and audit bodies are not equally accessible zone-wide.

Zonal coordination should ensure every state office maintains a consistent minimum standard of practice, regardless of local capacity constraints.

07

Strategies for Strengthening Accountability & Governance

Module 7 — What the institution and each staff member commit to doing

Institutional Strategies

Strengthen internal control systems with regular, independent internal audits and tracked recommendations

Establish and publicise a functional whistleblowing and complaints-handling mechanism with guaranteed protection

Conduct regular training and refresher courses on ethics, FOI and financial regulations

Develop service charters with clear, publicly known standards and timelines

Institutionalise transparent procurement — published plans and contract award notices

Invest in digitising records, financial management and service delivery

Publish periodic performance and financial reports in citizen-friendly formats

Strengthen collaboration with oversight bodies and civil society for independent verification

Individual Staff Commitments & Self-Check

EVERY STAFF MEMBER COMMITS TO:

- ✓ Keep accurate, complete, up-to-date records of official transactions
- ✓ Respond promptly and honestly to information requests
- ✓ Declare conflicts of interest as soon as they arise
- ✓ Decline gifts, favours or gratification tied to official duties
- ✓ Report suspected malpractice through appropriate channels
- ✓ Participate constructively in audits and performance reviews
- ✓ Treat members of the public with courtesy, fairness and responsiveness

A SIMPLE SELF-CHECK

Before taking any official action, ask yourself:

- 1** Is it lawful?
- 2** Would I be comfortable if it were made public?
- 3** Does it serve the public interest rather than a private one?
- 4** Am I keeping a proper record of it?

If uncertain on any point — pause, and seek guidance from a supervisor or the compliance channel.

08

Roles and Responsibilities of Commission Staff

Module 8 — Every cadre carries a specific accountability duty

Roles by Cadre

Cadre / Role	Specific Accountability & Transparency Responsibilities
Zonal / State Coordinators	Model ethical leadership; ensure compliance with procurement, financial and FOI obligations; escalate irregularities promptly.
Heads of Department	Enforce internal controls; sign off on transactions within approved limits; ensure timely departmental reporting.
Finance & Accounts Staff	Ensure TSA and financial-regulation compliance; support audit exercises.
Procurement Officers	Ensure due process, competitive bidding and documentation per the Public Procurement Act.
Records / Information Officers	Maintain organised, retrievable records; support timely response to FOI requests.
Field / Operations Staff	Provide accurate field reports; engage the public transparently; report irregularities observed.
All Staff	Comply with the Code of Conduct; declare conflicts of interest; safeguard public resources.

09

Case Studies and Scenarios for Group Discussion

Module 9 — Apply what you've learned to realistic situations

Case Studies 1 & 2

The Delayed FOI Request

A journalist requests the list of contractors awarded a recent project. The Records Officer is unsure whether to release it and sets the request aside for two months.

DISCUSSION

What does the FOI Act require on timelines? What risks does the delay create? What should the officer have done?

The Vendor's Gift

Ahead of a bid evaluation, a vendor sends a staff member on the evaluation committee an expensive gift “as a token of appreciation for past cooperation.”

DISCUSSION

Is this gift acceptable? What ethical principle is at stake? What should the staff member do?

Case Studies 3 & 4

The Missing Records

During an internal audit, the audit team requests supporting documents for payments made six months earlier. The department cannot produce complete records, citing poor filing practices.

DISCUSSION

What accountability mechanism failed here? What internal control weaknesses does this reveal? What corrective actions would you recommend?

The Whistleblower's Dilemma

A junior staff member discovers a colleague inflating the cost of minor procurements and pocketing the difference, but fears retaliation if they report it.

DISCUSSION

What protections exist for whistleblowers in Nigeria? What channels are available? How should the Commission ensure staff feel safe to report?

Evaluation Quiz — Key Questions

Q**What defines accountability?**

The obligation to answer for decisions and accept responsibility for outcomes.

Q**Which law guarantees public access to information?**

The Freedom of Information (FOI) Act, 2011.

Q**Which agency investigates corrupt practices by public officers?**

The Independent Corrupt Practices and Other Related Offences Commission (ICPC).

Q**Must assets be declared only once, on assumption of office?**

False — declarations are required on assumption, periodically, and on leaving office.

CONCLUSION & WAY FORWARD

Good Governance Begins With Each One of Us

- 1** Apply these principles and tools to your specific role and department
- 2** Champion transparent and ethical practice among colleagues
- 3** Report suspected malpractice through appropriate channels, without fear of retaliation
- 4** Support the Commission's reforms towards digitisation, open data and improved service delivery
- 5** Participate in periodic refresher training to stay current on governance standards

“Good governance begins with each one of us, in every file we keep, every decision we make and every citizen we serve.”