



Ghana's Identity Ecosystem



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01

INTRODUCTION



Executive Summary

This report provides an overview and analysis of Ghana's identification ecosystem (IE). It discusses seven major identification (ID) systems: Birth Certificates, Voter ID cards, National Health Insurance cards, Driver's Licences, Passports, National Identification cards (Ghanacard), and SIM cards. The authors focus on how these ID systems — especially the Ghanacard and Sim cards — shape access to citizens' rights, access to public goods and services, and participation in the national economy.

The report draws from existing publications such as those produced by the World Bank Group's Identification for Development programme. The report's methodology closely follows a recent study of Kenya's IE undertaken by Caribou Digital. Accordingly, while the positive utilities of Ghanaian ID systems are highlighted, there is also a substantive focus on the infrastructure, laws and social norms that underpin them, and on the risks and vulnerabilities faced by their users.

The complexity of Ghana's IE is evidenced by the multiplicity of actors – from politicians and government officials, to civil society organisations (CSOs) and private companies – participating in the space. Attention is paid to how they influence Ghana's IE as the contending and complementary interests shape how citizens' lives may be improved by ID systems. This also enables the report to provide recommendations for how these actors should strengthen the positive utilities of Ghana's ID systems while curtailing their excesses.

To holistically understand the connections between the actors and institutions affecting Ghana's IE, an online map accompanies this

report. It presents the IE's major elements, such as registries, regulatory authorities, private services, and ID credentials, and it shows how they are physically and politically connected to one another. Each map element has a profile card that provides general information about its role within Ghana's IE, links to evidence used in the report, and for further reading. The map can be accessed [here](#).

The map and report's narrative draw upon research in Ghana between August 2019 and February 2020. In addition to desk-based research, the authors utilised interviews and conversations with stakeholders from state, private sector, and CSOs. Focus group discussions were also held with women and girls.

Many Ghanaian women and girls face significant barriers to participating in the formal economy, given that the ID systems are increasingly critical to their social and economic wellbeing. Accordingly, the focus group discussions explored how they access and use major ID systems. The report also captures their perspectives, frustration, and hopes as they navigate Ghana's IE.

The report's recommendations are targeted at government bodies, development organisations, and CSOs. The recommendations suggest reforms and policies aimed at strengthening the inclusiveness of Ghana's IE as well as promoting personal and data privacy rights. The report can also be of value to readers interested in the politics that accompany the design and use of ID systems in Global South countries.

Findings

Over the years, there has been multiplicity of government-issued ID cards. The National

Health Insurance Authority, the Driver and Vehicle Licensing Authority, Electoral Commission, Passport Office, the Social Security and National Security Insurance Trust, and the National Identification Authority each issues an ID card. These cards are in addition to other government-issued credentials such as the Birth Certificate and the recently announced Ghana Dual Card for government workers. The Electoral Commission is also currently pushing to compile a new biometrics-based register for the general elections in December 2020. This card glut is notwithstanding the fact that the Ghanacard has been marketed as a ‘one-card for all’ solution for the future of the IE.

Ghana’s card glut has had adverse implications for the government and citizens. The adverse implications include increasing costs for multiple citizen enrolment exercises —the Ghanacard project alone will cost an estimated \$1.2 billion over 15 years —, as well as the maintenance and update of multiple registers and their associated infrastructure. The multiple ID cards have led to registration fatigue among citizens and a general scepticism of the benefits of ID systems. More importantly, duplications also mean the dispersal of critical citizens’ data in a country with a nascent data protection regime and increasing threats to data privacy.

Political parties, especially those in opposition, have consistently raised challenges to the laws and practices related to Ghana’s various operational and planned ID systems. In doing so, ID systems are increasingly situated in a polarized political milieu, with corruption allegations a key highlighted dimension. Partisanship has also shaped Ghana’s IE through the appointment of politically exposed leaders to various ID-related institutions. This has often led to change management issues, implementation challenges, and inconsistencies and delays in the roll-out of ID systems.

CSOs have been active in Ghana’s IE. While there are few that entirely focus on ID systems, some have tackled related issues whilst advocating for good governance, elections, and access to healthcare. In doing this, they have used the media as well as judicial platforms to demand accountability and reforms. However, while our focus group discussions show that there are

peculiar challenges faced by women and girls in accessing and using various ID systems in Ghana, CSOs tend to overlook such issues.

International development organisations have been integral to Ghana’s IE by providing technical and financial support to government-led ID projects. For example, the World Bank has supported Ghana’s national identification project and provided logistical support to the passport office. UNICEF has also played an important role in supporting birth registration through the M-Birth project. So far, these organisations have largely steered clear of the politics of Ghana’s IE but will increasingly be unable to avoid it.

Private sector actors play an important role in Ghana’s IE, primarily as technology providers and ID validators. Public-private partnerships are also becoming the vehicle of choice for the Ghanaian government in the ID projects. Nonetheless, the role of private sector actors in providing access to, and safely storing, citizens’ data continues to be an issue of concern. The private sector has also been implicated in the procurement politics of Ghana’s IE and the issues around vendor lock-in.

Overall, the major challenge with Ghana’s IE concerns the weakness of the birth registration regime. In practice, many Ghanaians, especially those in non-urban areas, are not registered. This becomes a lifetime albatross around their necks as the birth certificate remains a foundational credential for accessing other important IDs that allow participation in economic and political life.

Recommendations

- At the governmental level, there should be stronger inter-institutional synergy amongst actors and institutions responsible for ID systems. This will help reduce the multiple costs of citizen enrolments, interoperability challenges, and infrastructure. Positively, the Ghanacard is designed to host fourteen different applications. Thus, there is an available technical solution if the political will can be generated.
- As private sector players become more central in Ghana’s IE, it is important

that their access, sharing, and use of personal data are explicitly regulated and effectively monitored. Fortunately, Ghana has a Data Protection Act and an associated Commission that could competently oversee the protection of data privacy if backed by sufficient material resources and political will.

- Civil Society Organisations (CSOs) should draw on technical expertise to deepen their understandings of ID systems and its socio-economic implications in Ghana. Such expertise could be gained by collaborating with experts and international civil society entities operating in the IE space.
- CSOs that prioritise issues related to ID systems are necessary to promote citizens' participation in the economic and political life of the country. In particular, specialists'

focus on issues related to vulnerable groups – such as women and girls, and rural populations – will assist people to access ID systems and hold authorities to account.

- International development organisations should increase investments designed to strengthen the accountability systems that relate to ID schemes in Ghana. The most urgent tasks centre on supporting the Data Protection Commission and CSOs working on ID issues.
- International development organisations should provide more support toward the education of citizens on their data privacy rights, threats to data privacy, and channels for asserting their rights. Governmental actors and CSOs must also support such public education.

Glossary of Terms

Authentication is a process for determining that an individual presenting a credential is the person it was issued to, usually by asking them to provide something they know (a secret pin number), something they have (a one-time code received on their phone) or something they are (their fingerprints, iris scans or voice).

Identity is an indicator of one's relation to others and to institutions. It is something people create, have or can be given. However, other people and systems can always contest identities. For this reason, identities must be proven and, in some cases, deemed legitimate to have a purpose beyond the individual.

Identification (ID) is the process through which an identity is proven or legitimated. It allows individuals to gain access to others and institutions, and to claim their rights within wider systems such as associations, markets or states.

ID vulnerabilities can be defined as the degree of exposure to risk and uncertainty, and the ability of an individual or community to respond to that, often through consumer choice or by accessing accountability mechanisms within civil society, or among service providers and governance institutions. Vulnerabilities can lead to and entrench risks.

Identification ecosystems (IE) consist of the totality of ID systems within a single state. This includes everything from foundational ID

systems such as birth and death registers to functional national ID systems such as citizenship cards, social protection and voter enrolment registers. It also includes private sector ID systems such as financial services and credit ratings agencies that provide users with digital IDs. An IE's ID systems may be interconnected, drawing upon one another's data, using the same infrastructure, and subject to the same laws and authorities.

ID risks arise when people cannot or do not access ID systems that are central to obtaining state services, operating in markets, participating in politics and realising their rights. They are often the result of a lack of awareness, poor coverage or infrastructure, mismanagement, corruption and unused potential. Accordingly, ID risks can be a barrier to development.

Systems are interconnected sets of elements that are coherently organised in a way that achieves something. An identity system may consist of a complete chain from the owner of an identity register, such as a government or company, and the credential(s) they provide, such as cards or numbers, to the laws or practices that govern its use, the authorities that manage it and its users.

Validation is the process through which a credential, such as an ID card, unique identification number or certificate, is proven to exist on a register or database. Often this involves checking that information on the credential matches that on the register.

Acronyms

ABIS	Automated Biometric Identification System	MoC	Ministry of Communications
ABRS	Automated Birth Registration System	NITA	National Information Technology Agency
AFIS	Automated Fingerprint Identification System	NHIS	National Health Insurance Scheme
AML	Anti-Money Laundering	NHIA	National Health Insurance Authority
BDR	Births and Deaths Registry	NIA	National Identification Authority
BoG	Bank of Ghana	NID	National Identity Document
CA	Cities Alliance	NCD	National Commission for Democracy
API	Application Program Interface	NCA	National Communications Authority
CR	Civil Registration	NIS	National Identification System
CEO	Chief Executive Officer	NLCD	National Liberation Council Decree
CSO	Civil Society Organisation	NPP	New Patriotic Party
CSS	Centre for Socioeconomic Studies	NDC	National Democratic Congress
CTF	Counter-Terrorism Financing	OSP	Office of the Special Prosecutor
DPC	Data Protection Commission	PIN	Personal Identification Number
DVLA	Driver and Vehicle Licence Authority	PKI	Public Key Infrastructure
EC	Electoral Commission	PPP	Public-Private Partnership
EOCO	Economic and Organized Crime Office	PNDC	Provisional National Defence Council
GDPR	General Data Protection Regulation	SAGEM	Société Générales de l'Électricité et de la Mécanique
GhIPS	Ghana Interbank Payment and Settlement Systems Limited	SSNIT	Social Security and National Insurance Trust
GSGDA	Ghana Shared Growth and Development Agenda	SIM	Subscriber Identity Module
GIZ	Deutsche Gesellschaft für Internationale Zusammenarbeit	SSP	Social Security and Pension
G2P	Government to People	STL	SuperTech Ltd
GPS	Global Positioning System	TIN	Taxpayer Identification Number
ICT	Information and Communications Technology	TSP	Telecommunication Service Providers
ID	Identity Document	UID	Unique Identification Number
IE	Identity Ecosystem	UNICEF	United Nations Children's Fund
IT	Information Technology	VELD	Vehicle Examination and Licensing Division
KYC	Know Your Customer		
MIS	Management Information System		
MNO	Mobile Network Operator		
MPIP	Mobile Payment Interoperability Platform		
MRZ	Machine-Readable Zone		
MTN	Mobile Telephone Network		
MTTD	Motor Transport and Traffic		

02

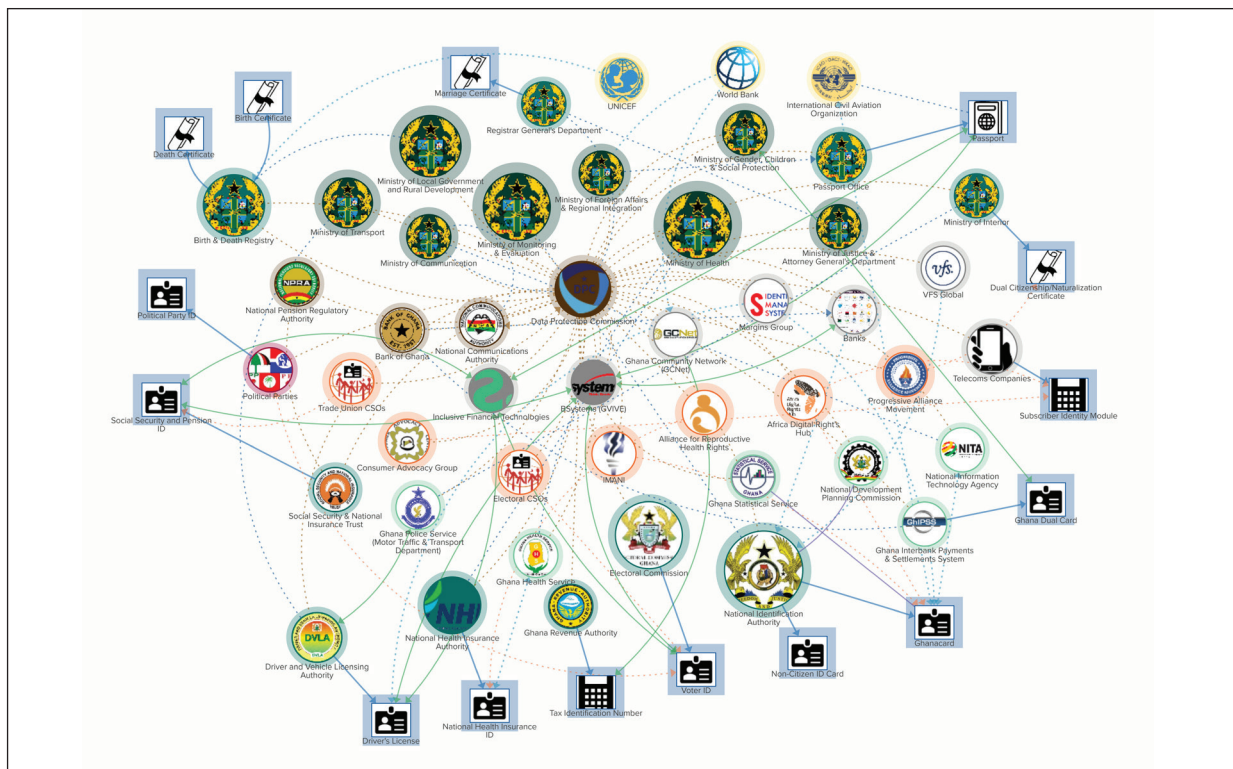
GHANA'S IDENTITY ECOSYSTEM



Ghana's Identity Ecosystem (IE) is made up of foundational and functional credentials, the Ministries, Departments and Agencies (MDAs) and private sector companies that issue them, regulatory authorities, service providers, international development agencies, and civil society organisations (CSOs).

Practically, there is a card glut as many major governmental agencies issue their ID cards even when other existing credentials can be used. There is also poor access to birth registration. As a result, many functional cards simultaneously serve as foundational credentials for Ghanaians.

Figure 1: Ghana's IE



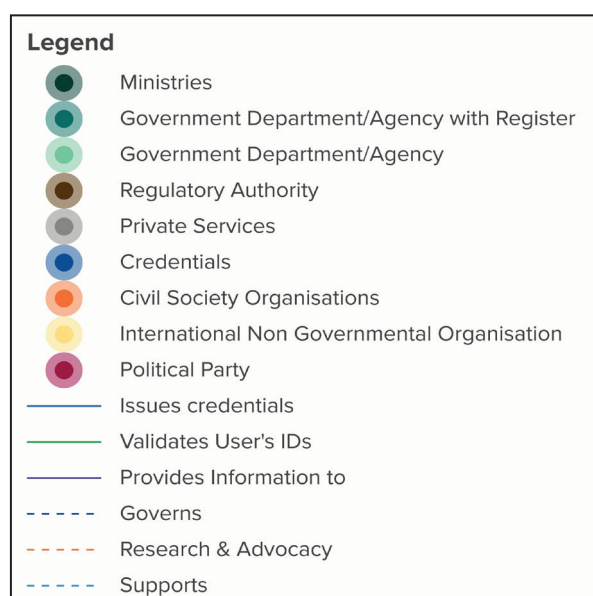
How to Read the Map

The individual elements of the map are sized in terms of their relevance and importance in the ID Ecosystem. The importance of an element is based on how it affects citizens' participation in political and economic life, the number of users, budget, as well as influence within the IE. For example, the National Identification Authority is the main statutory body responsible for issuing national IDs. Apart from its budget, they are expected to issue IDs to all citizens and foreigners in Ghana.

The map is mostly based on subjective judgements as accurate data on the number of credential holders or service users, and the budgets of Ministries, Department & Agencies (MDAs) were not readily available. Moreover, the relationships between all stakeholders could not be quantitatively measured. The report's narrative delves further into how the decisions were made.

We hope that others will suggest edits, updates and corrections to the map, making it a 'living' and evolving tool. For the full interactive version please [click here](#).

Map Legend



During the National Economic Dialogue in 2001, the need for a National Identification System (NIS) was recognised as a major socio-economic policy concern, culminating in the establishment of the [National Identification Authority](#) (NIA) in 2006. Beyond creating and managing the new NIS, a key reason for setting up the NIA was to end the duplication of government-issued credentials. The NIS is, therefore, designed to host and interact with multiple ID applications.

Although the government commenced the registration of citizens from 2008/9, to date the NIS has not been fully implemented due to wavering political will, funding challenges, and inter-agency turf wars.

It has been observed that the lack of a robust Civil Registration (CR) system has also challenged the installation of the NIS. Indeed, a study by UNICEF in 2013 indicated that Ghana's birth registration coverage rate had not gone beyond 65% since 2009.¹ It is also well established that a CR system is foundational to any IE and crucial for functional credentials.

Until recently, birth registration was heavily reliant on completing paper-based forms, causing major delays in the process. To help eliminate such bottlenecks and improve birth registration rates, Tigo² (a telecom operator) partnered with UNICEF and the Births and Deaths Registry to develop an Automated Birth Registration System (ABRS), also known as the m-Birth project. The ABRS seeks to give every child the right to a legal identity in Ghana.

While birth registration and NIS have stuttered, functional IDs have dominated Ghana's IE in terms of investments, access, use, and political

¹ UNICEF and The Government of Ghana. Birth Registration in Ghana - Bottleneck Analysis for Improved Coverage so that No Child is Left Behind. [UNICEF](#). February, 2016.

² Now known as AirtelTigo.

contestations. Among them, the Voter ID has probably been the most popular government-issued ID. The coverage, availability and accessibility of the biometrics-based credential has made the card a de facto foundational ID used by many to validate their identity when accessing public and private services (see Table 1).

Table 1: Ghana's Major ID Systems

Credential / Service	Issuing and Governing Authorities	Coverage	Uses	Connections
Birth Certificate	Births and Deaths Registry	Every natural person born in Ghana.	Evidence of date and place of birth. It is a dependency or breeder document to some ID systems in Ghana.	It is yet to be linked to the NIS for the determination of date of birth and citizenship.
Voter ID	The Electoral Commission	Currently, about 70% of births are registered. 17 million eligible and registered Ghanaians (18+ years and of sound mind) at the end of the limited voter registration in July 2019.	Card is used for voting in national, regional, and district level elections. It is also used to verify identity for financial and other services.	It is connected to all district EC offices. For verification of ID for financial and other services, it is also connected to B-systems Gvive- a private company based verification system
National Health Insurance Card	National Health Insurance Authority	Total active membership represents about 38% of the population of Ghana	To access healthcare, subscribers present the NHIS card to the health facility. Officials at the health care facility verify the card and the biometric information before providing healthcare.	Biometric verification devices have been deployed at the major healthcare centres.
Driver's Licence	Driver and Vehicle Licensing Authority	Motoring public national.	The only valid requirement for driving cars and vehicles in Ghana. It is also used for verification of ID	The DVLA system has been connected to the GCNet system, making it easy to use the chassis numbers of

			for financial and other services.	vehicles to track the custom and import documentations.
Passport	Ministry of Foreign Affairs and Regional Integration.	All Ghanaians are eligible.	Used to access visas, for processing international travel at the airport, and as proof of identity in accessing various private and public services.	It is linked to the Immigration Service systems at all ports of departure or entry for verification.
National ID Card	National Identification Authority	Currently 5.7% of the 29,500,939 population are covered under the 2017 re-launched NIS programme	The national identity card issued to an individual shall be used for the following transactions where identification is required; including application for and issuance of a passport, driver's licence, opening of individual or personal bank accounts, registration of voters, registration of SIM cards; applications for public or government services, facilities, approvals, permissions or benefits etc.	The NIA is required to provide public and private entities with dedicated secure connections to the central NIS server and make queries in real time on an ongoing basis; thus, verification will be done via web-based portals or APIs.
SIM Card	Issued by Telcos and governed by the Ministry of Communication through the National Communications Authority (NCA)	Telcos have connected 19 million unique mobile subscribers, equivalent to a population penetration of 67% in	It is used in mobile phones for telephony, internet, mobile banking, and digital credit services.	The database is owned by the various telcos and is connected to the NCA system for regulatory purposes.

		Ghana. we have 34.5 million registered mobile phone users, in a population of under 30 million		
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Like the Voter ID card, passports, NHIS cards, [SSNIT cards](#), and Driver Licences serve as de facto foundational credentials. These cards are biometric-based. Therefore, there is not only a card glut, but an increasing resort to biometrics by governmental agencies. The recently introduced national ID card, also known as the ‘Ghanacard’, continues this tradition.

Figure: 2 Infographic Summary of Focus Group Discussion



Beyond the spiralling cost of Ghana’s card glut for the government’s budget, challenges also relate to access. For example, there have been longstanding complaints about non-staff persons acting as middlemen - ‘Goro Boys’ - and making the acquisition of drivers’ licences and passports expensive, long winded and chaotic.³ ‘Goro Boys’ extract sums of money from persons trying to obtain these credentials. Birth registration systems are also not easily accessible in non-urban areas as registration centres are typically in major hospitals and BDR offices.

³ Ebenezer Afanyi Dadzie. Corruption at DVLA, GRA, passport office ‘very real’ – GII survey. [Citifmonline](#). 8 March, 2017

Box 1: Women and Girls in Ghana's IE

Ghana's National Gender Policy (guided by Article 17(1) and (2) of the 1992 Constitution), guarantees gender equality and the freedom of women and men, girls and boys from discrimination on the basis of social or economic status. However, the policy makes no mention of women and girls' access to ID systems.

Our focus group discussions and interviews with women and girls of low socio-economic status suggest that even though they recognise government issued credentials (especially the National Health Insurance Card, Birth Certificate, Voter ID, and Ghanacard) as important, they face many challenges in acquiring them. These include the cost, long waiting periods, distances to enrolment centres, and harassment. In some cases, the women and girls we met have relied on prominent figures in their community or 'connections' to obtain needed credentials.

For example, most of the participating women and girls woke up at dawn (around 5am) and queued till about 5 pm to obtain credentials, especially health insurance cards. They spent an average of about 12 hours on the site of registration. This excludes transportation to the sites and the discomfort of waiting under the scorching sun.

"It took me more than a month to get my national health insurance card, even then it was because I knew someone. If I had no connections, I am sure it will take more months to acquire."

Irene 18

"Mine had to go through many processes because I changed my surname. So, I first went to Dome but they said because I changed my surname, I had to go to the headquarters at Nsawam. So, I went to Nsawam. Many people were there, and they also told me the same thing, so I had to go to Amasaman. That place too, they told me the same thing but luckily my uncle had a friend there, so he did it for me." **Selassie, 16**

"When we went, the place was crowded. everyone had wanted to rush to do it so wherever you pass, you will see people registering so you wouldn't get time to register, so we stayed there for long but they told us to go and come later and then do it. so, when I went and I came the next day, my dad had to talk to them before they would have to do it for me." **Agyeiwaa, 17**

"The reason I had mine was with the help of someone, it kept long, we couldn't get it early, so we went to see an elder and he helped us." **Akosua, 33**

"It was a risk for women especially to give their data out because during the Ghanacard registration process, I gave my details out and one of the registration officers who is a guy called me to assure me that he would help me to go through the process faster if I agree to be his lover. My father had to intervene for him to stop calling me. He later called me to say my father is too protective of me." **Jennifer 17**

"It's difficult for ladies to get a passport. My sister wanted a passport a she got an agent. She paid the money and sent all the required documents, but she didn't get it. She kept calling but the agent rather got furious and insulted her." Priscilla, 18
Nonetheless, the discussions revealed that majority of the women and girls

Challenges also exist to proving one's citizenship, a problem which has been compounded by Ghana's poor Civil Registration (CR) processes. In the focused group discussions undertaken for this report, women of low-income status highlighted the gendered nature of the

implications of the access and use of ID cards in Ghana's IE. The interviewees complained about issues such as high cost, long waiting periods and harassment at registration centres (see Box 1).

Figure: 3 Focus Group Discussion with Senior High School Girls



Social exclusion issues are at the centre of political contestations about Ghana's IE. For example, in 2016, the Supreme Court of Ghana disallowed the use of the National Health Insurance Card as proof of citizenship when registering for the Voter ID, arguing that the card is legally accessible by non-Ghanaians.⁴ The suit was brought before the court by persons with known political party affiliations worried that

non-Ghanaians living in border regions would vote. More recently, in January 2020 (less than a year away from the general elections), the EC announced the need to acquire a new biometric registration system and compile a new voters' register as a way of cleaning the electoral roll.⁵ Opposition political parties and CSOs challenged the EC's position arguing that the current register and registration system are good enough.⁶

⁴ Abu Ramadan & Anor vs. The Electoral Commission & The Attorney-General. Supreme Court of Ghana. 5 May, 2016

⁵ Ghana News. EC provides detailed justification for new biometric system, voters' register. [MyjoyOnline](#). 1 January, 2020

⁶ New biometric register for 2020 is unreasonable and not needed. [GhanaWeb](#). 18 December, 2019.

Electoral Register just needs upgrade, not total replacement – CSOs. [BusinessGhana](#). 20 January, 2020.

18 CSOs kick against new voter register. [Class FM Online](#). 16 January, 2020.

New Register: The Will Of The People Will Prevail – NDC To EC. [Modern Ghana](#). 21 January, 2020.

Funding challenges have underpinned the stalling of many of Ghana's ID projects, including the NIS and reform of the birth registration processes. For example, while the NIA started registering citizens in 2009, a reliable register has still not been fully compiled. Furthermore, due to the NHIA's increasing indebtedness to healthcare providers, some healthcare providers currently refuse to accept the NHIS card making it redundant in some areas.

Closely tied to the challenges with funding are corruption allegations. The SSNIT card digitalisation project, for example, was tainted by a scandal in 2017 involving the procurement of ICT infrastructure at a cost of \$72 million. The Economic and Organized Crime Office (EOCO) commenced an investigation into the issues leading to the prosecution of five persons including a former CEO, IT Manager and the CEO of one of their service providers.⁷

While Ghana can hardly boast of CSOs with specific interests in the IE, through a focus on corruption, governance, and democratic processes, many (in conjunction with the media) have worked on issues connected to the excesses of ID systems. For example, there are CSOs that have engaged on issues of data privacy, while others that are concerned with poverty that have examined issues of access, use and discrimination.

Private sector firms also play a major role in Ghana's IE: issuing ID cards (See Table 1), validating government-issued IDs, providing technical, and financial support for projects.

Telecom companies also provide registration services for SIM cards which are increasingly central to Ghana's growing digital economy. However, the private sector has not operated in a vacuum. For example, in June 2019 the Auditor-General alleged that the [Electoral Commission](#) (EC) had sold voters' data to Bsystems Limited without an official agreement.⁸ The scandal publicly highlighted connections between identification politics, regulation, and private companies.

International actors are also present in Ghana's IE. As noted above, UNICEF is a strong supporter of the country's mobile-based birth registration system. The World Bank has also provided various forms of support to the Ghanaian government through mediums such as the E-Transform and Public Sector Reform for Results projects.⁹

Overall, Ghana has a vibrant IE with several national and international actors, ongoing ID systems projects, and opportunities. Yet, due to challenges associated with the political nuances of Ghana's IE, its poor birth registration regime and the stalled NIS, functional IDs essentially serve as foundational credentials for many citizens. This has also limited rural communities' access to birth registration, led to inefficient and corrupt registration processes for vital credentials, and fostered a proliferation of functional IDs by government agencies. Invariably, this increases the costs for citizens seeking to access government-issued IDs as well as for government spending on ID systems, thereby, limiting the available resources for realising the IE's full developmental potential.

⁷ Ex-SSNIT boss, four others slapped with 29 charges over \$72m contract. [GH Headlines](#). 24 July, 2018

⁸ EC sold voters data to private firm without an agreement – Auditor-General. [Graphic Online](#). 27 June, 2019.

⁹ World Bank Supports Ghana To Improve Public Services Delivery. [World Bank](#). 23 October, 2018.

03

THE GOVERNMENT

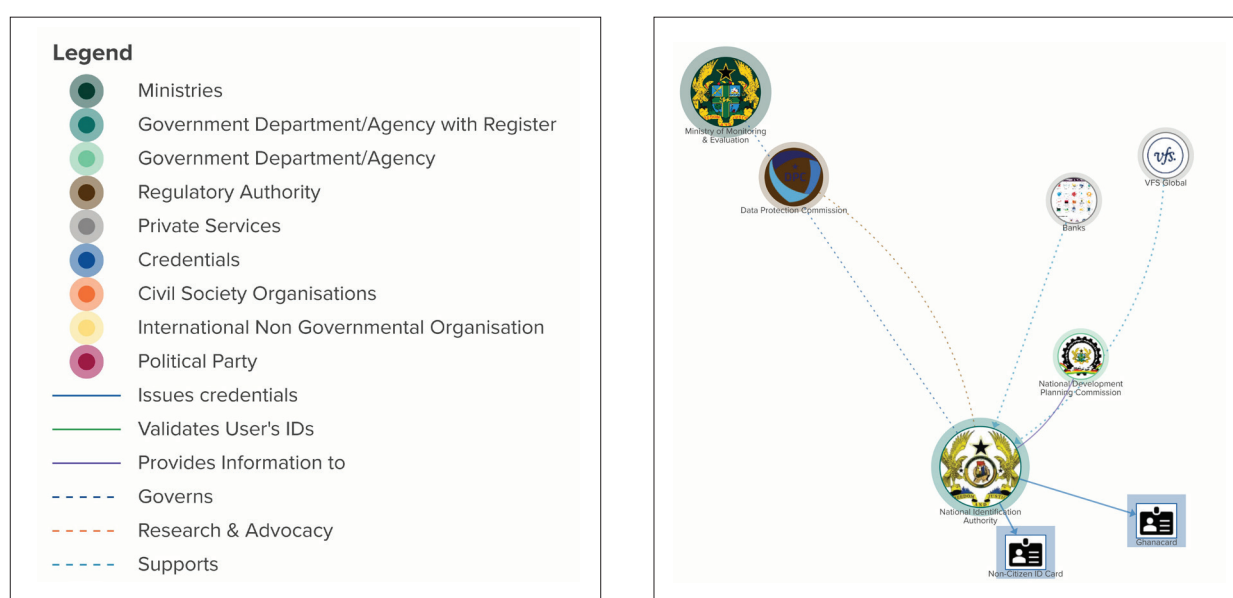


The Government plays a pivotal role in Ghana's IE through MDAs. The executive arm's role in the development and issuance of national ID credentials includes facilitating the development of laws, issuing directives and appointing the various heads of ID issuing agencies. While the government remains central to the IE, partisanship often leads to an undermining of the autonomy of governmental agencies and their ID systems.

Following a policy recommendation from a national economic forum held in 2001, the New Patriotic Party (NPP) initiated the NIS in 2003. This involved setting up the physical infrastructure, appointing key officers, procuring biometric equipment, and deploying field officials for a mass registration drive in 2008.

Following a national election in December 2008, the NPP government lost power to the opposition

Figure 4: The National Identification Authority



National Democratic Congress (NDC) party. At the time, mass registration had been completed for about four out of the ten regions (there are currently 16 regions) of the country. After the change in government, the exercise was halted for about two years, ostensibly due to a lack of funds.

The new government also appointed new leadership, including the Executive Secretary

(CEO), board members, project leaders, and officers, at various levels in the NIA. The new leadership made changes to the project's plans and design. These changes led to a loss of institutional memory, political witch-hunting, the appointment of politically exposed individuals, and a break in the project's execution.¹⁰ The NPP government took back the reins of political power from the NDC in 2017. Once again there were changes to the NIS's leadership, management,

¹⁰ Owusu-Oware, E. K., Effah, J., and Boateng, R. Institutional enablers and constraints of national biometric identification implementation in developing countries: The case of Ghana. [Academia](#). 2017

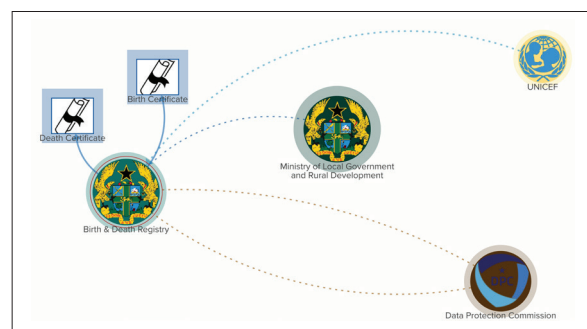
staff, and ongoing project strategies.¹¹ These too were widely seen as politically partisan. For example, in a recent report, the Executive Secretary was accused of appointing only NPP affiliated field officials for mass registrations.¹²

When the NPP government was in power from 2001 to 2008, it issued a directive to all ID issuing-agencies to halt building siloed biometric systems. The intention was that the NIS would centralise all of Ghana's government issued credentials. However, between 2009 to 2016 agencies such as the NHIA, DVLA, Passport Office, and SSNIT developed their own siloed biometric systems. This multiplied the costs of Ghana's IE, adding to the already estimated \$1.2 billion that will be spent on the NIS over 15 years.¹³

While these government agencies received resources to build their systems, the BDR which oversees CR system, continues to be inadequately

resourced. Indeed, budget allocations to BDR have been unpredictable and inadequate for the provision of birth registration services. For instance, in 2019, the Government of Ghana allocated a budget of GH¢6,328,582.00 (about US\$1.1million) to the BDR, less than 1% of the total budget allocated to its parent ministry.¹⁴

Figure 5: Birth & Death Registry



As discussed in chapter 2 and 3 of the report, this has created structural and systemic

Box 2 – Ghana's Politics

Ghana has a [multi-party](#) democracy. In the 4th Republic (1992 to date), executive power has alternated between the two main political parties, the NDC and the NPP. The first election that paved the way for democratic rule was in 1992 and since that time, elections have successfully taken place every four years.

It has been argued that political parties with strong ethnic bases are the ones that are more popular and successful (Alabi & Alabi, 2007). Furthermore, Arthur (2009) contends that voting tends to be dependent on ethnic lines although it is not the only variable that determines who wins.

The involvement of political parties in Ghana's IE has typically centred around the issue of social exclusions. Voting patterns have been such that groups living in border areas often favour the NDC. The history and fluidity of these areas have been a major reason cited for the unreliability of various civic and functional registers, especially the Voter ID card.

The NPP has long viewed the voters register as bloated with 'foreigners', especially those from the border countries who are perceived as NDC sympathisers. The NDC, on the other hand, has sought to have the voter register maintained. In 2018, the NDC minority accused the NPP government of discriminatory attempts in the Volta region with regard to obtaining birth certificates and the Ghanacard as a whole. It was reported that the NPP halted birth registrations in the region, thereby, making it difficult for people to obtain the Ghanacard.¹⁷ According to the NDC, this would result in a disenfranchisement of the right to vote for qualified voters.

¹¹ Ibid.

¹² NIA Registration: NPP Recruits Footsoldiers in Bono East. [Ghanaian Democrat](#). 24 November, 2019

¹³ Daily Guide Africa. Ghana cards to cost \$293 million, not \$1.2 billion – NIA. [GhanaWeb](#). 2 June, 2018

These opposing positions have been reignited with the announcement that the EC intends to compile a new voter register for the December 2020 election. While the NDC is vehemently kicking against this move, the NPP has given its blessing.

weaknesses in birth and death registration in Ghana. In 2017, a technical subcommittee set up by the government recommended the integration of the BDR and the NIA's systems. This recommendation had already been made on several occasions prior to the commencement of the NIS in 2008. More than a decade on, this is yet to be realised in spite of its significance to Ghana's IE.

The role of Government within the IE has been largely shaped by partisan politics between the two major parties. One major controversy that illustrates this occurred when the NPP government announced plans for using the NIS to compile the voter register for the 2004 elections. The NDC stood in support of the EC to strongly oppose the plan, warning that they would not accept any register prepared through the NIS. Although the NPP government rescinded its decision, the NIS became politicised and Ghana has since lacked a political consensus on the direction of its national ID project.

More recently, the NPP and the NDC fell into disagreement over which national ID documents should be used to establish citizenship in acquiring the Ghanacard.¹⁵ The NPP government supported the NIA's recommendation of only accepting the birth certificates and passports as proof of citizenship. However, the NDC insisted that the Voter ID should be added. The NPP countered that many foreigners are on the electoral roll and accused the NDC of facilitating

their registration. Eventually, however the NDC decided to support the Ghanacard project citing its developmental value.

Sector specific ID systems have also had their share of partisan politics and interferences. For instance, the NHIS has been a target during election campaigns with each party accusing the other of its poor management and ineffectiveness in facilitating access to health services. Thus, following a change in power, the new government moves to change NHIS's leadership and reviews the status quo in line with its electoral promises. Allegations of corruption against the previous leadership and government often ensue. For example, soon after the change of government in 2017, the SSNIT digitalisation project was tainted with corruption charges against the former NDC appointed leadership.¹⁶

In short, the influence of politics cannot be understated in Ghana's IE. It is increasingly important to mitigate political interference that cultivates corruption, duplicates costs, and reduces technical expertise. Accordingly, there is the need for an independent NIS insulated from the partisan manipulations. Actors and organisations such as the Auditor-General and the Commission on Human Rights and Administrative Justice (CHRAJ) with support from CSOs, interested politicians, and the backing of international development organisations could help safeguard the integrity of the NIS.

¹⁴ Medium Term Expenditure Framework(MTEF) for 2019-2022: Program Based Budget Estimates. [Republic of Ghana Ministry of Finance](#). 2018.

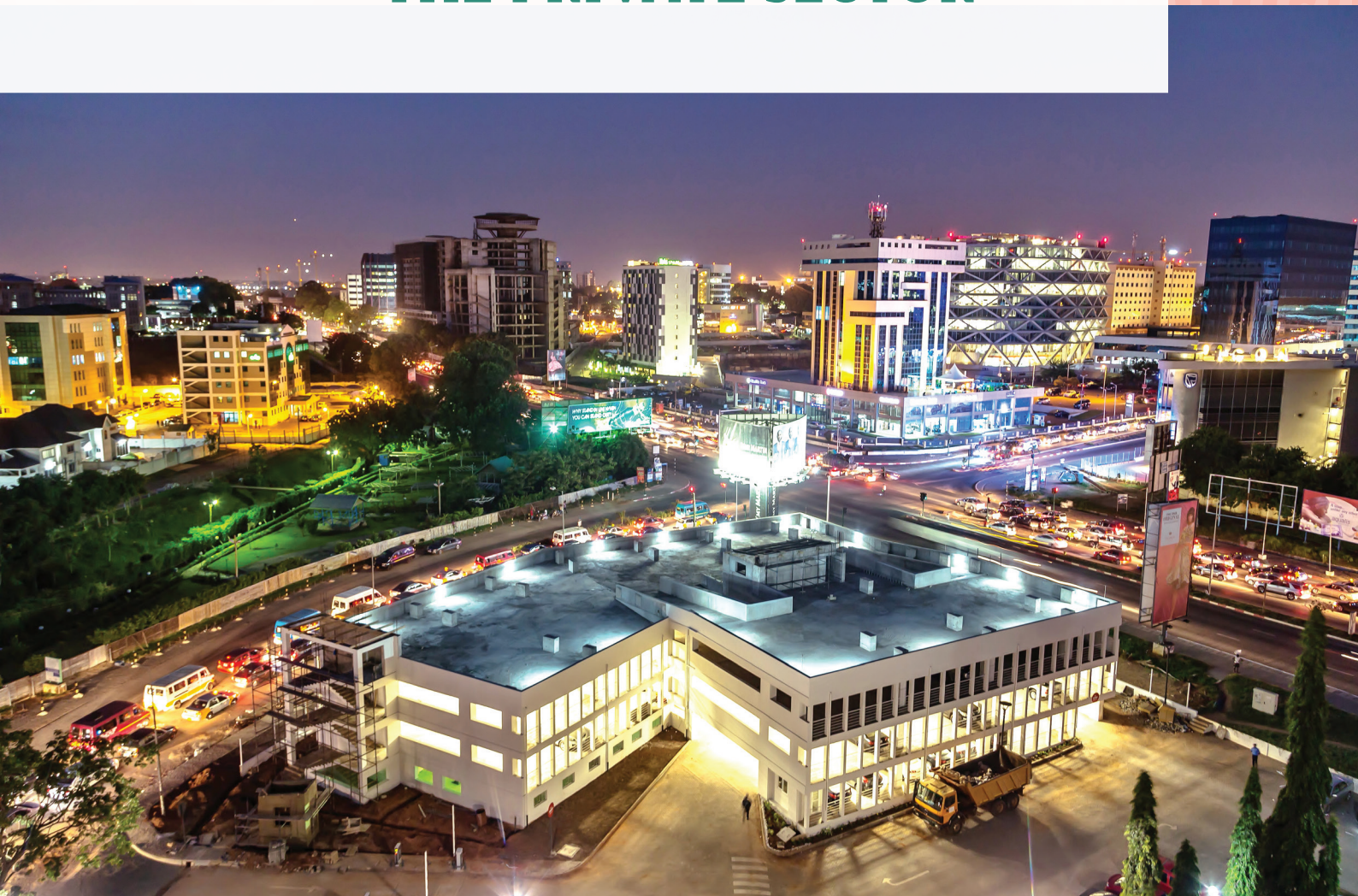
¹⁵ 'Ghana card for development not voting'- Asiedu Nketia. [GhanaWeb](#). 11 August, 2019.

¹⁶ Delali Adogla-Bessa. SSNIT scandal: EOCO arrests Ernest Thompson, four others. [Citi Newsroom](#). 18 April, 2018.

¹⁷ Musah Yahaya Jafaru. Minority accuses govt of discriminatory tactics in Ghana Card Registration. [Graphic Online](#). 12 July, 2018

04

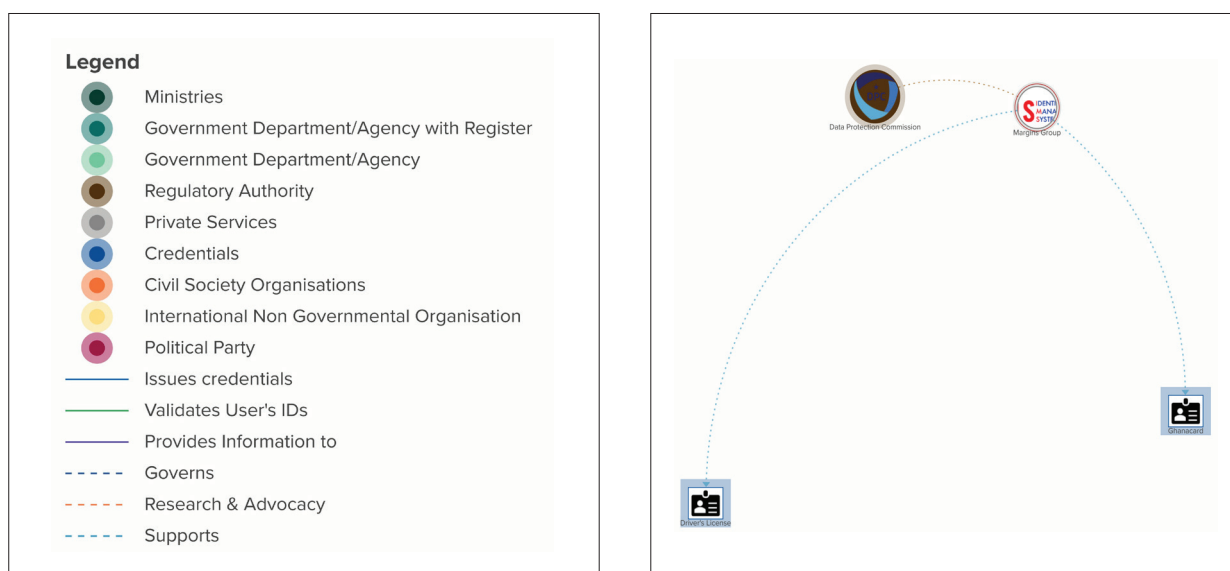
THE PRIVATE SECTOR



The private sector plays a significant role in Ghana's IE. These roles range from building infrastructure, ID management systems, and providing technical advice, to delivering value added services within the IE. Even though government has relied heavily on the private sector for the implementation of its ID systems, this relationship has been burdened by procurement politics.

In 2006, the government engaged SAGEM Sécurité (SAGEM), a French company, as the technical partner for the NIS on a turnkey basis. SAGEM supplied the biometric and related devices for mass registration, backend servers and databases for data processing and the production of cards. However, soon after the mass registration and setup of the backend ICT systems, the engagement with SAGEM came to

Figure 6: Margins Group



a halt in 2013 due to financial and logistical constraints. As a result, further technical and data updates on the system could not be done.

The issues associated with the financial and logistical constraints, as well as the proprietary nature of the systems, led to a vendor lock-in that prevented the government from utilizing the existing infrastructure and systems. Moreover, the intended network infrastructure to link the registration centres to the head office for continued registration could not be implemented.

Amidst these challenges with the NIS, [Identity Management System](#) (IMS), a local company was

contracted by the NIA to implement a Foreigners' Identification Management System (FIMS) to produce identity cards for foreign nationals. The FIMS quickly became a contentious issue as the NIA's general staff expressed misgivings about setting up a separate database for foreign nationals, contrary to the original plan of implementing one identity database. Under the new NIS, however, the earlier FIMS data has been ported and merged with the citizens database.

In 2017, with a change of government, the NIS was re-launched and IMS was again engaged through a Public-Private Partnership (PPP) arrangement with the government. In turn, IMS engaged sub-contractors for the production of a

smart card chip and the supply of card printers. To ensure network connectivity, the NIA also engaged MTN and Vodafone to deploy their data network to enable registration and instant printing of smart identity cards at the registration points. These interventions have largely resolved the prior vacuum created by SAGEM.

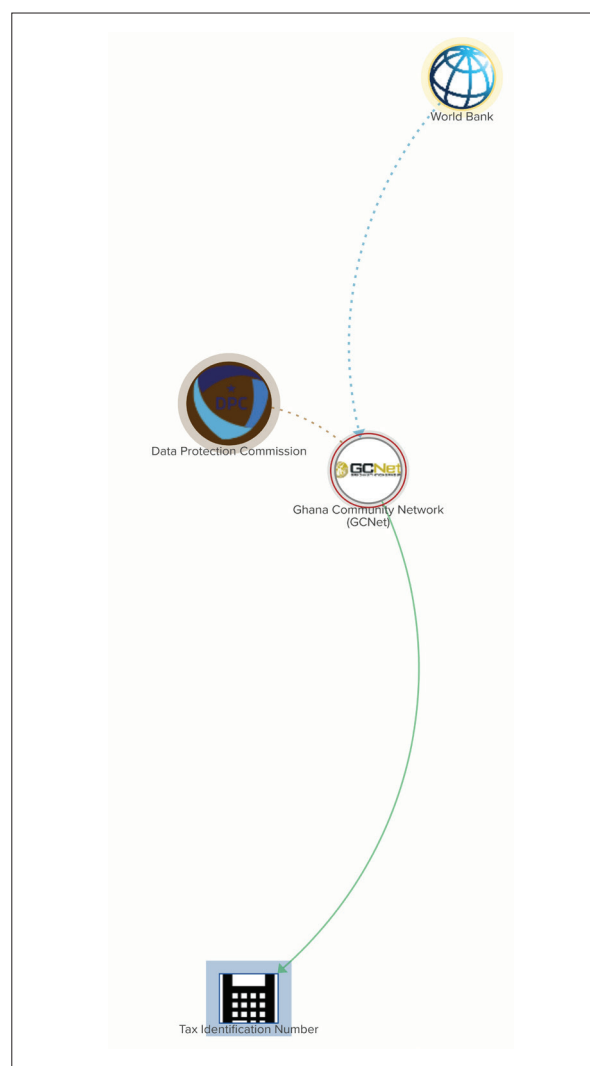
Nonetheless, the re-launched NIS project has become associated with several allegations of bribery and corruption in the award of the contract. For instance, a Member of Parliament has accused the NIA Executive Secretary of accepting a parcel of land as a bribe from the CEO of Margins Group — IMS's parent company — to award the contract to them. The Executive Secretary has however, strongly refuted such claims.¹⁸

Various private sector entities have also been engaged to work on other government managed ID systems through international competitive tender. Ghana's national identification card project for example has international technology firms subcontracted by IMS II — the local private partner for the project. These international vendors include Crypto-vision (Germany), Dermalog (Germany), Entrust Datacard (USA), and NXP (Netherlands)- (NIA, May 2018). Additionally, Genkey, headquartered in the Netherlands, and its partner Supertech Limited (STL), an Israeli firm, were the technical partners for the Voter ID. STL was engaged by the EC in 2012 to take charge of the country's elections data centre and biometric devices.

Yet, in 2019, with the inception of a new EC leadership, the contract with STL was terminated. In view of the new EC leadership, STL's annual maintenance charge of US\$5.2 million was too

high. In addition, being a foreign firm, they considered their unfettered access to the data centre and their control of the ICT systems for elections a risk to Ghana's sovereignty.¹⁹ This is a pressing subject given claims that specialist foreign data firms have played ambiguous, and possibly malign, roles in several African elections.²⁰

Figure 7: GCNet



¹⁸ Ghana Card project costs \$293m not \$1.2bn – Prof. Attafuah fires “confused” Kennedy Agyapong. [GH Headlines](#). 4 June, 2018.

¹⁹ Ernest Senanu Dovlo. Electoral Commission terminates \$5.2million maintenance contract of STL ABC News Ghana. [ABC News Ghana](#). 15 September, 2019.

²⁰ Brian Ekdale Melissa Tully. Cambridge Analytica in Africa – what do we know? [Democracy in Africa](#). 10 January, 2020.

The EC has since decided to use its internal IT staff to manage all IT related systems for elections in order to avoid a situation whereby unrestricted access is given to a foreign entity. Meanwhile, it is again engaging private sector entities to provide a data centre and the biometric registration and verification devices.²¹ It is, however, likely that new private sector partners will have more levels of access and control of the ICT systems for elections than what STL enjoyed.

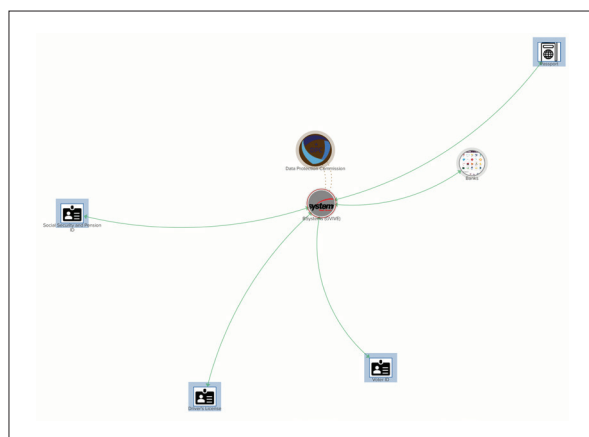
Despite this episode, STL remains the technical partner for the NHIS's ID system and in charge of the NHIA's biometric system. For the SSNIT ID system, which forms part of the Trust's wider digitalisation initiative known as the Operations Business Suite (OBS), STL is a technical partner within a consortium of ICT companies.

Worryingly, the OBS has also been stained with an alleged corruption scandal involving the procurement of ICT infrastructure at a cost of U\$72 million. An investigation which was started in August 2017 by the Economic and Organized Crime Office (EOCO) and that is now overseen by the Attorney-General is yet to be concluded. Nonetheless, five persons including a former CEO, IT Manager and the Head of OBS's Management Information Systems Division have already been charged by the courts.²²

Private companies also play a key role in providing identity verification and, to a lesser extent, authentication services for both government and private sector issued IDs. Among them, [Bsystems](#) is a wholly owned Ghanaian ICT company. Their GVIVE, a web-based ID verification utility, integrates existing ID database systems for real-time verification of customers credentials. Smile

Identity, a partnership of American and African entities also provides a web-based system for the verification of ID cards.²³ [Inclusive Financial Technologies](#) has also developed a single identity verification API that enables financial services providers to be Anti-Money Laundering (AML), Know Your Customer (KYC), and Counter-Terrorism Financing (CTF) compliant.

Figure 8: Bsystems



Of the three verification systems, Bsystems' GVIVE is well known as it offers real-time online ID verification in seconds for credentials such the Driver Licence, Voter ID, Passport, and SSNIT ID. Speaking at an awards ceremony in Accra, held in September 2017, Bsystems' CEO revealed that about one hundred public and private institutions in finance, insurance, and logistics are connected to the their platform.²⁴ The CEO further confided that GVIVE's portal is accessible to 254 rural banks together with other saving and loans companies. However, the current online verification service is based on validating the individual's ID number and cannot process biometrics.

²¹ Electoral Commission of Ghana. The Case for a New Biometric Voter Management System and New Voters Register. Electoral Commission Ghana. [Graphic Online](#). 31 December, 2019.

²² High Court gives A-G two weeks to hand over documents to Ernest Thompson, others. [GH Headlines](#). 23 January, 2019.

²³ [Smile Identity Website](#). Accessed 1 June, 2020.

²⁴ Bsystems wins Best IT Company Award with GVIVE online ID Verification solution. [Biztech Africa](#). 25 September, 2017

The Bank of Ghana has stated that with the advent of GVIVE, banks have recorded a higher KYC compliance.²⁵ The provision of verification services by the private sector has, however, come under public scrutiny. In June 2019, a special audit report by the Auditor-General alleged the sale of voter information to Bsystems by the Electoral Commission. This issue was refuted by Bsystems and is currently under-going investigation by the Data Protection Commission.

With respect to SIM cards for mobile phone services, Ghana's major Mobile Network Operators (MNOs) are MTN, Vodafone, AirtelTigo, and Glo (NCA, 2018). The MNOs provide voice, data, and mobile money services. However, they are required by law to register and issue SIM cards to their subscribers. According to NCA's 2018 industry report, the total number of mobile voice subscriptions by the end of December 2018 was 40,934,875 (NCA, 2018), which approximates to twice Ghana's population.

The mobile money services currently offered in Ghana are MTN Mobile Money, Vodafone's Cash, AirtelTigo Money, and Glo XChange. Mobile payments involve the use of the phones to purchase airtime, transfer funds, pay for goods and services, make remittances, receive government benefits as well as enable mobile savings. The mobile money services have been designed to work on both analog and smartphones thus, it fosters inclusion.

The mobile money industry has grown significantly in the last decade, enabling financial inclusion.²⁶ In a country of about 30 million people, there were about 12,725,649 active

mobile money accounts as at March 2019. A Mobile Payment Interoperability Platform (MPIP) introduced by the Ghana Interbank Payment and Settlement Systems Limited (GhIPSS) in 2018 has enabled the different networks of the MNOs and the banks to interoperate without the need for intermediary agents. For example, an MTN customer can pay money to or receive money from Vodafone customers. With the MPIP, customers need not acquire multiple SIM cards and mobile devices for transfers.

The MNOs rely heavily on agents to register SIM cards and to provide mobile money services in Ghana. The use of the agents has been known to lead to several challenges. They include the pre-registration of cards which creates identity issues, incidents of fraud, and inability to capture accurate information on SIM and mobile money account holders.²⁸ To better mitigate these challenges, the Minister of Communication has recently directed a SIM card re-registration exercise by MNOs during the first half of 2020.²⁹ This directive did not however specify any new mechanisms to eliminate the pre-registration challenges.

Overall, private sector actors are pivotal to the provision of credentials, related infrastructure, and verification systems amidst the IE's card glut. However, their place is heavily shaped by procurement politics. Going forward, the access to and use of citizens' data by private sector actors will require better governance. In particular, clarity is required about what personal data private companies working on government ID projects can access, what they collect, and how they can use or share such data.

²⁵ Financial Stability Department/Market Conduct Office Workshop on Inward Money Remittance Services. September, 2019.

²⁶ MoMo transactions dominate financial inclusion agenda. [GhanaWeb](#). 10 February, 2020.

²⁷ Payment System Statistics. [Bank of Ghana](#), 2019

²⁸ Unregistered SIM Cards to be deactivated in 2020. [MyjoyOnline](#). 14 October, 2019

²⁹ Nana Appiah. Ghana to embark on re-registration of SIM cards in 2020. [Biztech Africa](#). 15 October, 2019.

05

THE LEGAL ENVIRONMENT



The 1992 Constitution is the supreme law of Ghana that defines government structures, systems, and processes as well as the legal framework for Ghana's IE. These range from legislation that underpins government agencies in charge of the various ID systems, through to regulatory requirements for both government and private sector entities in the IE. However, the regulatory environment is weak compared to other countries. Sanctions and fines for non-compliance are often small, with processes that entail tedious, expensive, and long court actions. Overall, this weakens the legal and regulatory environment as many entities can be non-compliant with little or no action.

The Constitution of Ghana can be said to have served the country well with no concerns over the provisions relating to Ghana's IE. The Constitution of Ghana defines who a citizen is; persons entitled to be registered as citizens; and those eligible for dual citizenship.³⁰ Although, the definition of who a citizen is unambiguous, often in practice (like most African countries), citizens living in the border towns and communities are stateless. This has been attributed to the fluid and hybrid nature of people who live in border towns with the same language and sometimes family. In Ghana, this issue continues to create political tension on who is a citizen and for that matter, entitled to vote in these communities.

The Constitution also guarantees fundamental rights and freedom of citizens and persons living in Ghana; establishes and/or provides the legal basis for the existence of public sector institutions in the ecosystem; as well as guarantees the

independence of such institutions including the Electoral Commission.³¹ Often, however, the issue of constitutionality in Ghana's IE forms the basis of various court actions³² on appropriate validation documents for IDs; independence of ID issuing authorities; the exercise of discretion; and the protection of fundamental rights.

The Registration of Births and Deaths Act, 1965 (Act 301) provides the legal basics for the registration of all births, deaths, and fetal deaths. The Act also criminalises actions such as improper disclosure of information, interference and alterations in the register. The Registration of Births and Deaths law has seen minimal review and amendment since its passage in 1965. It has been called outmoded thereby leading to calls for its review. Notable among its shortcomings are failure to provide for integration with key IDs such as the Ghanacard; the use of electronic technology; the registration of surrogate births; and the notification of births and deaths by health professionals or institutions.

The National Identity Authority Act, 2006 (Act 707) and the National Identity Register Act, 2008 (Act 750) established the NIA and the legal basis for the provision of the Ghanacard. Act 750 provides among other things the requirements for registration for the Ghana card. The National Identity Register Act, 2008 (Act 750) was amended in 2017 by the National Identity Register (Amendment) Act, 2017 (Act 950) to expand on the application for ID cards and requirements for registration. This amendment was criticised on the requirement for the digital address code. Key among this issue was

³⁰ Articles 6, 7, and 8 of the 1992 Constitution (As amended by The Constitution of the Republic of Ghana (Amendment) Act, 1996 (Act 527)). [World Intellectual Property Organization](#). Accessed 1 June, 2020

³¹ Ibid; Chapter 5 (Articles 12 – 33)

³² Abu Ramadan v Electoral Commission case; Benjamin Komla Kpodo, MP & Anor vrs The Attorney-General; Cubagee Vrs Asare and Others; Nii Tetteh Opremreh VRS The Electoral Commission & Anor; etc.

the security, integrity and accessibility of the digital address code as implemented then.³³ An application challenging the refusal of officials of the National Identification Authority (NIA) to allow registration for a Ghana Card without a digital address was also filed in the courts.³⁴ The applicant, contended that the digital address code was unknown to the laws of Ghana; therefore asking him to produce the code was illegal, unreasonable and discriminatory. The Court dismissed the application as having no factual or legal basis. Subsequently, in line with the ruling of the Court all the personal information required to be recorded in the register are mandatory, the Centre for Socioeconomic Studies (CSS) demanded NIA's compliance on the said ruling.³⁶

While both the birth certificate and the Ghanacard can be said to be foundational IDs, they are implemented through varied laws with different powers and structures by different state agencies as stated above. This legal and structural differences challenge the smooth implementation of both laws. It has however been suggested that the representation of the Birth and Death Registry on the NIA's Board in accordance with the National Identity Authority Act, 2006 (Act 707) is meant to bring some consensus on the need for collaboration by the institutions implementing these laws. While this may have been attained by virtue of the laws, it is however not the case in practice as the differences in the resource capabilities of the institutions limit their ability to effectively collaborate.

Over the course of Ghana's history, the way and manner in which the various government's have treated the Birth & Deaths Registry (in spite of its critical role in the IE) is akin to an orphaned child. This is clearly demonstrated when one compares the attitude of the various governments towards the NIA vis-à-vis that of the Birth & Deaths Registry. The NIA is one of the few government agencies within Ghana's IE that has been moved

between different ministries in order to give it the necessary policy attention and priority. In 2006, it started life under the Office of the President, it was then moved to the Ministry of Communication, and is now under the Ministry of Monitoring and Evaluation. While one may argue that the NIA's operations need not differ wherever it is located, in Ghana the leadership and wider agenda of Ministries drive and influence whether or not ID systems will be a priority. This current government's interest in the Ghanacard has led to the proactive approach or attitude in the passing and approval of legislations, budget, and implementation of the ID related projects. In 2017, Parliament swiftly amended Act 750 to provide for further conditions and requirements for registration under the Ghanacard. The Registration of Births and Deaths Act, 1965 (Act 301) in spite of the clear challenges, is yet to receive any such attention.

There are also other overarching laws that broadly govern and or regulate ID related issues such as banking and finance, communications, information technology, cybersecurity, pensions and privacy/data protection. The Banks and Specialized Deposit Taking Institutions Act, 2016 (Act 930) and the Payment Systems and Services Act, 2019 (Act 987) for instance, govern KYC, AML/CTF, and other banking requirements. They establish the form of IDs required for opening bank accounts and engaging in transactions. They also determine the information required for the opening of a mobile money account.

Ghana has intensified its efforts towards the fight against money laundering and terrorist financing following the enactment of the Anti-Money Laundering Act, 2008 (Act 749), the Anti-Terrorism Act, 2008 (Act 762) and the subsequent passage of the Anti-Money Laundering Regulations, 2011 (L.I.1987). Ghana's IE has indeed played a significant role in the implementation of the laws and guidelines on KYC, AML/CTF since the duty to obtain and

³³ Godwin Akweitech Allotey. Digital address system: Ghana to pay Google \$400,000 yearly. [Citifmonline](#). 27 October, 2017

³⁴ David Yaw Danquah Esq. Lawyer drags NIA to court for refusing to register him for Ghana Card. [Legalstone Solicitors LLP](#). 23 October, 2018

³⁵ Court endorses NIA's demand for digital address code. [Ghana Business News](#). 24 April, 2019. ; Francis Kwarteng Arthur vs. The National Identification Authority (Suit No. HR/DJ22/18)

³⁶ Kojo Hadjor. CSS demand compliance report on NIA ruling. [Sharpnewsgh](#). 29 April, 2019

verify identification documents is one of the key requirements for accountable institutions. Although, the legal and regulatory environment has been proactive, there is the need for an improved monitoring and surveillance systems with a view to preventing, detecting, and responding effectively and timeously to the threats of fraud, money laundering, and terrorist financing. The challenges faced are not strictly related to the extent of the laws but to their implementation.

The Electronic Transactions Act, 2008 (Act 772) implemented by the National Information Technology Agency (NITA) governs the development of ICT infrastructure, e-government

services, and regulates ICT in Ghana by providing standards to ensure interoperability and cyber security compliance. The impact and influence of the ETA have not been strongly felt in Ghana's IE. This can be attributed to [NITA](#) not being adequately funded. It has also suffered from leadership changes leading to loss of institutional memory thereby limiting its ability to be efficient and effective in implementing its mandate under the ETA. In the last three years for instance, NITA's Director-General (CEO) has been changed three (3) times.³⁷ The current head is in an acting position until a substantive CEO is appointed. Many of its technical staff have also left as a result of alleged political interference. The Data Protection Act was passed by

Box 3 – Privacy and Personal Information

With regards to sharing personal information during registration for the national IDs, interviewees said they were okay sharing any information the application form required. A few (all women), however, were not comfortable answering the question of marital status. During the focus group discussions, both girls and women also said that they never asked and were never told of the risk involved in giving their data out to government.

“The registration people ask me if I am married and I say no. Then they ask if I have married and divorced. I became annoyed and told them that I have told them already that I am not married. That question I didn't like at all; is it by force to marry?” **Mamuna, 33**

“The information that the government collects is for our own benefit” **Mumme, 22**

One woman who had her money stolen (because she normally gives her phone to Mobile Money agents to withdraw the money for her) vowed not to have a mobile money account. It was however interesting to observe that all the interviewees of the focus group discussions do not ask about the privacy of their data. They all perceived that it is a legal requirement to give their data / information to the government.

³⁷ Appointment of AG. Director General of NITA. [Republic of Ghana Ministry of Communications](#). 21 February, 2018.

NITA gets a new boss. [Biztech Ghana](#). 30 June, 2015

Times of Africa Correspondent. Interview with Mr. Jeffrey Konadu Addo Ag. Director General of National Information Technology Agency (NITA), Ghana. [Times of Africa](#). 20 May, 2017.

³⁸ EC sells voters' data to private company-Auditor-General reveals. [GhanaWeb](#). 23 October, 2019.

Parliament in 2012 to set up the [Data Protection Commission](#) and regulate the processing of personal information. The Data Protection Act is potentially a law that will affect every facet of Ghana's IE. Its role is, however, limited to the regulation of the processing of personal information. In Ghana's IE Map, one therefore sees the Data Protection Commission (implementers of the Data Protection Act) connected to almost all entities within the IE as a result of their role as data controllers/processors. Yet, the Commission's role has so far been limited to general awareness and registration of data controllers/processors. Until recently, very little effort has been made either through guidelines or enforcement to engage the IE.

The Commission's role came under public scrutiny in 2019 when the Auditor-General alleged that voter information had been sold to Bsystems (an ID verification and validation service provider).³⁸ The public felt that the

Commission had not been effective in playing its role of ensuring that data controllers and processors collect and process personal data within the tenets of the Data Protection Act. Shortly after this incident, the Executive Director of the Data Protection Commission indicated they were going to investigate the issue. However, there has not been any official correspondence from the Commission on this investigation.

Like most public institutions, the Data Protection Commission from its inception has also not been well resourced to enable it to effectively implement its mandate. The Commission lacks the necessary skillsets and financial wherewithal to put in place the mechanisms required to make its laws work. Also, with a change in government in 2017, there was an abrupt change in leadership which stalled the implementation of its mandate. While some awareness has been created about privacy and data protection in Ghana, generally compliance remains unaddressed.³⁹

³⁹ Albert Antwi-Boasiako. Implementation of Data Protection Legislation in Ghana-Challenges & the Way Forward. [UNCTAD](#), 2016.

Table 2: The Implementation of Identification Legislations

Legislation Title	Key Provisions	Implementation
REGISTRATION OF BIRTHS AND DEATHS ACT, 1965 (ACT 301)	This Act creates the office of the Births and Death Registry, and the Register for births, foetal deaths, and deaths.	The Registry has made steady progress since its establishment. In spite of this progress only 60% of new births in Ghana are registered every year, leaving about 40% unregistered.
NATIONAL IDENTIFICATION AUTHORITY ACT, 2006 (ACT 707)	This Act establishes the National Identification Authority and mandates it to create, maintain, provide the use of national identity cards.	In June 2017, the programme was re-launched and as at January 2020, 7, 353,702 enrolments have been done and 4,325,168 cards issued.
NATIONAL IDENTITY REGISTER, 2008 (ACT 750) NATIONAL IDENTITY REGISTER (AMENDMENT) ACT, 2017	The Acts provide for the capture of personal information of individuals by the National Identity Authority for the issue of national identity cards The amendment in 2017 increased the data points from 11 to 31.	There are currently two different registers under the NIA. The 2008 register was created under Act 750 and the 2017 amendment created the new register which is still been compiled through the mass registration exercise.
NATIONAL IDENTITY REGISTER REGULATIONS 2012 (L.I. 2111)	This regulation provides for the individuals eligible for the registration under the parent Act. The regulation also sets out the mandatory use of the Ghanacard.	The regulation has been in existence since 2012 but there has not been adequate enforcement since the Register itself has not been successfully compiled since its commencement in 2008.
PASSPORTS AND TRAVEL CERTIFICATES DECREE, 1967 (NLCD 155) As amended by PASSPORTS AND TRAVEL CERTIFICATES (AMENDMENT) LAW, 1993 (PNDCL 310)	The law provides the authority that is charge of the issuance of passport and authorises its validity and use. It provides the grounds of issuing and refusing an application for a passport.	While the birth certificate has been central in proving citizenship, the weakness of the birth registration regime has meant that many Ghanaians especially those born in non-urban areas do not have a birth certificate. This adversely affects the access to passports.

NATIONAL HEALTH INSURANCE ACT, 2012 (ACT 852)	This Act established a National Health Insurance Authority to implement the National Health Insurance Scheme. It further empowers the Authority to grant credentials to healthcare providers and facilities that provide healthcare services to members of the Scheme.	A 2017 estimate of active membership of the Scheme is about 10.6 million (about 40% of the population). However, the financial viability of the scheme is continually being threatened by the constricted funding sources, increasing enrolments, and increasing debt owed to healthcare providers.
DRIVER AND VEHICLE LICENCING AUTHORITY ACT, 1999 (ACT 569)	This Act establishes the Driver and Vehicle Licensing Authority to promote good driving standards in the country. It provides for the issuance of driving licences by the Authority.	The authority is reported to have issued 1.2 million driver's licences by the end of 2018 through its 28 operational centres that facilitate enrolment across all the regions in Ghana. Its major challenge had been the intermediaries known in the local parlance as "Goro Boys" who parade as middlemen of the Authority creating an illegitimate bureaucracy.
NATIONAL PENSIONS ACT, 2008 (ACT 766) NATIONAL PENSIONS (AMENDMENT) ACT, 2014 ACT 883	This law provides for the establishment of the Social Security and National Insurance Trust to operate basic national social security pension scheme.	Since the introduction of its digitalisation project in 2014, access to pension and related services through its 50 branches in the ten regions of Ghana has been improved.
ELECTRONIC COMMUNICATIONS ACT, 2008 (ACT 775)	The Act provides for regulation of the electronic communications and related matters.	This Act and its regulations has made it possible for the NCA to takes steps to continuously monitor and enforce its powers under the laws. The Act is instrumental for measuring operators' performance in the delivery of service to their respective consumers and sanctioning where necessary.
SUBSCRIBER IDENTITY MODULE REGISTRATION REGULATIONS, 2011(L.I 2006)	It provides that no network operator shall activate a Subscriber Identity Module card unless it is registered.	While the SIM registration regime has attained some success, there still remains the problem of the sale of pre-registered sim cards.

06

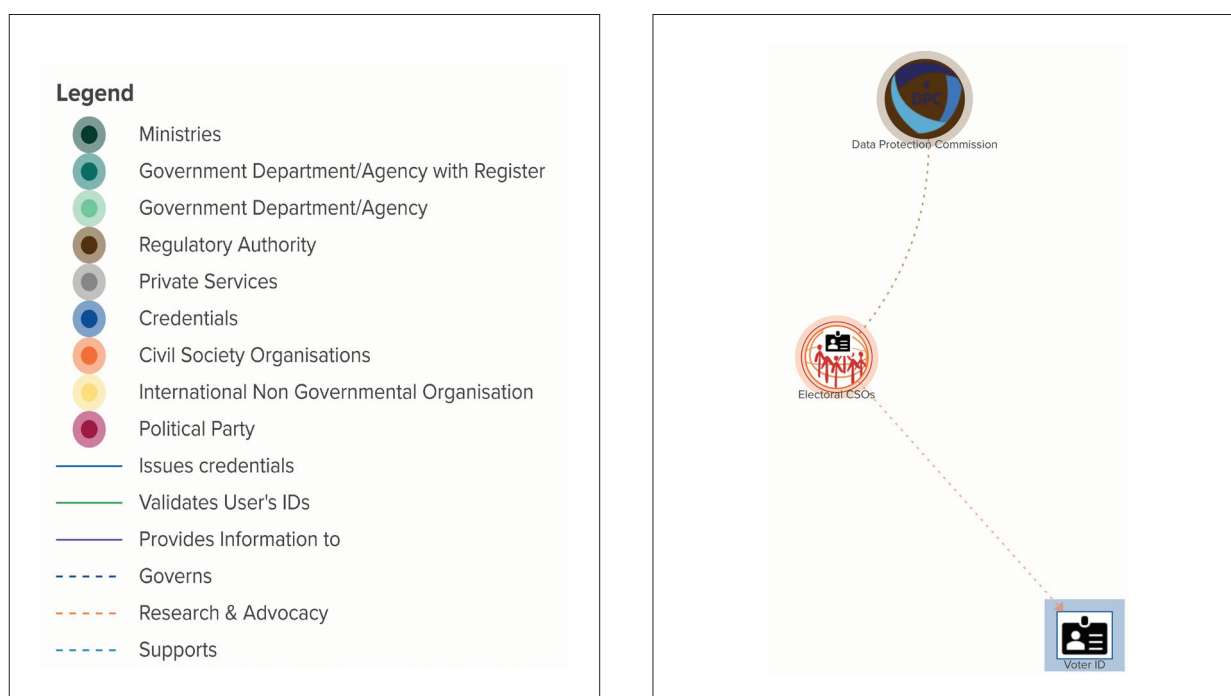
CIVIL SOCIETY



In the 1980s, the highhanded and authoritarian tendencies of the military government (the PNDC) made critiquing state policies and actors a very risky endeavour. This was the era of the so-called ‘culture of silence’ (Ankomah, 1987). Things improved considerably for civil society and the media when Ghana returned to democratic rule in 1992 backed by a Constitution

that was pro-civil rights and liberties. Since then, Ghanaian CSOs have had reasonable space to challenge the excesses of government and have taken advantage of it. While Ghanaian CSOs may not be specifically dedicated to identification issues, they have advocated for constitutional rights as they relate to ID systems.

Figure 9: Electoral CSOs



In 2001, the Criminal Libel and Seditious Law was repealed by Parliament. This led to a significant change and growth in civil society activism in Ghana (Laryea & Kwansah-Aidoo, 2007). Ghana’s growing democracy has also benefitted from the watchdog role of several CSOs including Centre for Democratic Development (CDD-Ghana) [Imani Ghana](#), Centre for Democratic Governance (CDG), Occupy Ghana, and Institute for Economic Affairs (IEA). As Botchway (2018) notes, “CSOs in Ghana have promoted the integrity of Ghana’s election... advocated [for] policy changes in some key governmental social and economic policies” and “have inculcated

democratic values of civic participation, political engagement and tolerance in the population thereby promoting democratic citizenship.”

CSOs in Ghana have also been key in translating state policies to the citizenry, mobilizing social discontent and, importantly, holding the government accountable. Key legislations such as the Freedom of Information Act and the Persons with Disability Act owe a lot to the consistent efforts of CSOs in Ghana. For instance, from 2015 to 2016, the government attempted to pass the Interception of Postal Packets and Telecommunication Messages bill however,

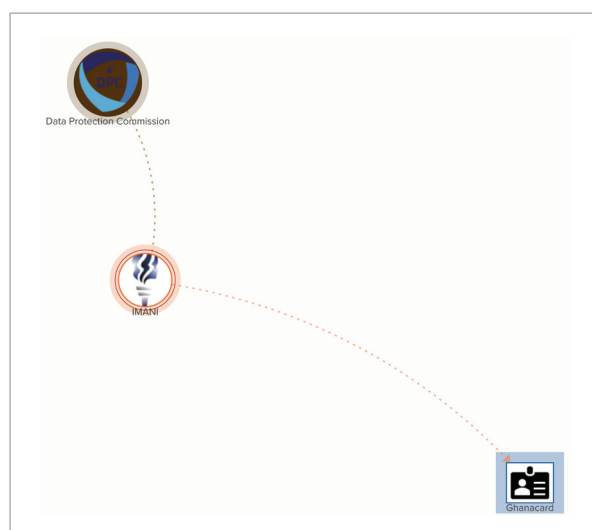
CSOs in Ghana played a key role in pushing the government to withdraw the bill. They were also vocal against the government's move to monitor telecommunication traffic in real time arguing that it would be illegal to monitor the content of calls and messages, and would threaten privacy rights.⁴⁰

Ghana IE does not have CSOs dedicated to identification issues. Instead, there are various CSOs with interests that bring them into focus with particular ID issues. For instance, in the case of the Alliance for Reproductive Rights, one finds child protection and maternal mortality CSOs interested in the NHIS card's impact on the children it seeks to protect.⁴¹ Similarly, CSOs within The Progressive Alliance Movement have promoted the rights of Ghanaians living abroad, engaged with issues of voter registration, and access to the Voter ID card. Organisations like Institute of Economic Affairs (IEA), Center for Democratic Development (CDD), Coalition of Domestic Elections Observers (CODEO) and the Institute for Democratic Governance (IDEG), in their work on promoting democracy, have also consistently engaged with issues relating to voter registration. Such bodies have been central in recent agitations against the decision by the Electoral Commission to compile a new biometric voters' register, for example due to concerns about necessity, cost and timeliness.⁴²

CSOs have also often canvassed and sustained public interest in state policies relating to Ghana's IE. They have used various media channels to express their views and demand accountability. For example, Imani Ghana – a think tank focussed on governance issues - has consistently used social media, blog posts, and media appearances to critique the state's approach to various identification projects. Imani has argued against making digital addresses a requirement in accessing the Ghanacard, highlighting that there are homeless people in Ghana who cannot have digital addresses and as such, may be excluded.⁴³



Figure 10: Imani Ghana



CSOs in Ghana have also used the courts and other judicial channels to ensure that citizen rights are not infringed upon in the context of the IE. The Centre for Socioeconomic Studies (CSS), for example, has lodged a petition with the Commission for Human Rights and Administrative Justice — an independent ombudsman — to compel the NIA to fully comply with the laws relating to the documents required for accessing the Ghanacard. At the heart of this petition is the legal requirement of a digital address before citizens can access the Ghanacard. CSS has argued that there are poor people without access to a smartphone and there are also several places without access to the internet. The specific matter is the subject of

⁴⁰ Withdraw 'spying bill' now-Occupy Ghana. [Modern Ghana](#). 24 February, 2016

⁴¹ Equip health facilities to enhance primary healthcare-ARHR. [GhanaWeb](#). 1 February, 2019

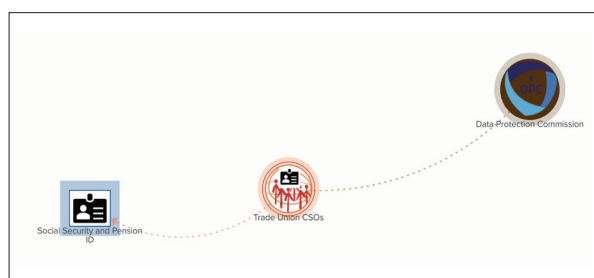
⁴² Marian Ansah. Reasons for new voters' register unconvincing – CDD-Ghana. [Citi Newsroom](#). 10 January, 2020

⁴³ Jonas Nyabor. Bright Simons questions NIA's Digital Address requirement for Ghana Card. [Citi Newsroom](#). 10 November, 2018

an ongoing legal suit against the NIA presented by a private citizen, Lawyer Francis Arthur.

In May 2019, the Consumer Advocacy Centre (CAC) sued the NCA and mobile network operators over the influx of unregistered SIM cards in the country.⁴⁴ They alleged it had led to consumers losing millions of cedis to fraudsters who use unregistered SIM cards to dupe people. In 2018, the Strategic Thinkers Network also sued the NIA for refusing to accept the Voter ID card as proof of citizenship when registering for the Ghanacard.⁴⁵ These cases illustrate the increasing resort to legislative activism by CSOs as they push various interests in the IE.

Figure 11: Trade Union CSOs



Ghanaian CSOs have also increasingly shown interest in wasted resources, corruption, state surveillance and democratic rights within the IE. Among them, the privacy and data protection focus of the [African Digital Rights Hub](#) (ADRH) is notable. It uses research and advocacy to help shape Ghana's IE and other African countries in favour of privacy and data protection rights. Here, the ADRH's publication, Data Protection Code of Practice for Digital Identity Schemes in Africa that was launched at

its 2019 Data Protection Africa Summit in Dakar is noteworthy.⁴⁶ The Code of Practice is meant to facilitate the adoption and implementation of good practices that ensure adequate protection and guarantee the right to privacy of subjects of digital identity schemes in Africa.

There is, however, a need for government actors to engage CSOs more in their policymaking. Often, CSOs react to government's IE-related decisions and government should respond with some form of consultation. CSOs must also be encouraged to invest more in expertise on identification issues, especially as the subject becomes increasingly central to citizenship and development in Ghana. As identification systems bring up a lot of technical issues as well as legal concerns relating to data protection laws and other legislation, accessing such competence could help the work of CSOs in this space. This will also be useful for a fuller appreciation of the implications ID systems have for citizenship rights.

Nonetheless, there remains widespread perception that CSOs are aligned to either the NDC or the NPP party. They are fuelled by various pressure groups that are sponsored by the political parties as CSOs. For instance, Let My Vote Count (LMVC) and OccupyGhana have been perceived as NPP sponsored CSOs. In a recent agitation by many CSOs against the EC's decision to compile a new voter register for the December 2020 elections, the LMVC came out to support the position of the EC and the NPP government.⁴⁷ Such close affinity between certain CSOs and political parties undermines the pursuit of legitimate concerns by CSOs.

⁴⁴ NCA, Telcos dragged to court over non-compliance of L.I. 2006 by Consumer Centre. [GhanaWeb](#). 16 May, 2019

⁴⁵ Class FM. Ghana Card: Group sues National Identification Authority. [GhanaWeb](#). 15 June, 2018

⁴⁶ Data Protection Code of Practice for Digital Identity Schemes in Africa. [Africa Digital Rights' Hub](#). November, 2019.

⁴⁷ Kwadwo Baffoe Donkor. Rally Behind EC-Let My Vote Count Alliance. [Graphic Online](#). 23 January, 2020

Box 4 – Development Organisations

The [World Bank Group](#) is the most significant international actor in Ghana's IE. Through projects like eGhana and eTransform it has collaborated closely with the government to promote the adoption of technology systems for governance and for accessing public services.

The eTransform project seeks 'to improve efficiency and coverage of government services through ICT and enhance ICT-enabled entrepreneurship' (World Bank, 2013). Initially, a major subcomponent of the project was the development of the national electronic identification system — backed by a credit facility of \$21.45m (World Bank, 2013). An additional \$7.7m was to be used to support the "digitization and integration of digital identity and verification systems into user agency operations".

Recently, the World Bank Group (2018) approved through the International Development Association a \$35m credit facility to promote public sector reforms in Ghana. A major part of this project was to improve the efficiency of public agencies working on ID systems such as the Passport Office, Immigration Service, Births and Deaths Registry, and Driver and Vehicle Licensing Authority.

Other international organisations have also invested in various aspects of Ghana's identification ecosystem. UNICEF, for example, has supported the improvement of birth registration systems in Ghana. Via the "m-birth" project, UNICEF (2018) supports the "computerized registration of infants below 12 months using mobile technology that includes tablets, phones, laptops or other computerized and auto linked mobile gadgets". There have also been international industrial associations like the GSMA that plays a role as a thought leader for mobile identification systems. All the telcos in Ghana are members of the GSMA.

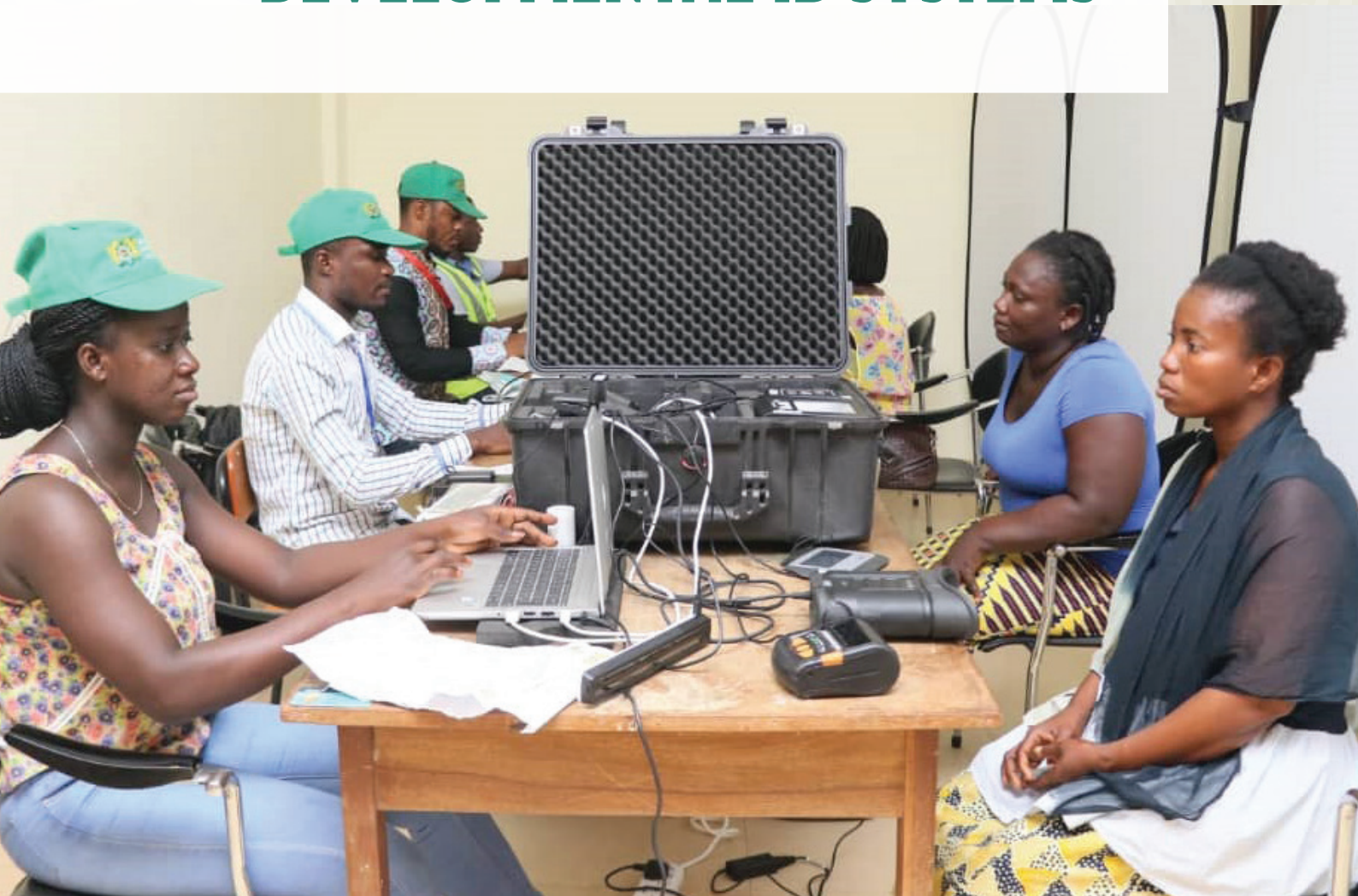
Generally, CSOs in Ghana have been receptive to interventions by international development actors in Ghana. There have not been any significant clashes between CSOs as mostly, CSOs' concerns are directed at governmental bodies.

CSOs are no doubt critical actors in Ghana's IE. As the government continues to promote ID systems as key to development and makes possession of IDs central to socio-economic inclusion, IE issues are likely to increasingly intersect with the primary focus areas of CSOs. This will deepen the participation of CSOs in

the IE space. CSO's ability to drive policy and engagements in Ghana's IE should therefore not be underestimated. They form part of the strategic force in ensuring the attainment of IDs for all. It is therefore critical that their role in Ghana's fast moving IE is recognised and their abilities keep pace with its changes.

07

DEVELOPMENTAL ID SYSTEMS



The remainder of the report highlights the developmental orientations of Ghana's IE. It begins by exploring the challenges and politics relating to the birth certificate and four functional credentials that serve as 'de-facto' foundational IDs'. The functional credentials were intended for voting, health insurance, travelling abroad, and driving but have often been used as proof of identity and citizenship. For example, the Voter ID card and the passport are often used for opening bank accounts and engaging in financial transactions. In this sense, these functional IDs permit access to critical goods and services beyond their intended remits.

After briefly discussing the four functional credentials, the analysis then focuses on the Ghanacard and SIM cards. It is argued that while the Ghanacard is being issued as the ultimate proof of citizenship and permitting access to public and private services, there are certain legal provisions and practical challenges that may make the card exclusionary. On the other hand, SIM cards are increasingly becoming important for financial inclusion. Accordingly, we discuss the opportunities and challenges facing the SIM registration regime.

Throughout this section, we discuss ideas underpinning each ID system, their uses, and the politics enabling or constraining their developmental potentials. The narrative draws upon the risks and vulnerabilities analyses found in Annex 1. There readers can dig further into evidence we found to support our arguments over each ID system.

Birth Certificate

The Government of Ghana funds the Births and Deaths Registry with support from development partners such as [UNICEF](#), Cities Alliance (CA), and Deutsche Gesellschaft für Internationale Zusammenarbeit (GIZ). Birth registration has recently increased to around 70% with more people in urban areas registering the birth of their children than in rural areas.⁴⁸ According to most recent statistics, there has been an increase of about 15.5% in birth registration comparing 2014 and 2017.⁴⁹ However, a study carried out in 2014 suggests that birth registration and certification has been much lower among children born to mothers with no formal education, mothers in rural areas, young mothers (15-19 years), and mothers of low economic status.⁵⁰

In the Ghana Shared Growth and Development Agenda 2014-2017, the under-development and under-utilization of the civil registration information systems; lack of awareness and non-compliance with civil registration regulations; and gaps in the events registers at all levels, are presented as major impediments to national development (GSGDA II). Key roadblocks to achieving universal birth registration in Ghana stem from the little importance attached to birth registration by some citizens and an insufficient allocation of resources at the local level for families to access birth registration services easily.

⁴⁸ Birth Registration: UNICEF works with partners in Ghana to ensure that every child has an identity. [UNICEF](#). Accessed on 27 May, 2020

⁴⁹ Assessment of the m-Birth Project A progress report on computerized birth registration in Ghana. [UNICEF](#). May, 2018.

⁵⁰ Fidelia Dake and Kamil Fuseini. Registered or unregistered? Levels and differentials in registration and certification of births in Ghana. [BMC International Health and Human Rights](#). 13 June, 2018

Nonetheless, a collaboration between the Government, UNICEF, and Airtel-Tigo has led to the use of a new automated mobile birth registration system in over 151 districts since April 2016. The new system utilizes mobile phone technology and reduces the need for manual forms and papers to reduce fraud. However, it is restricted to babies up to 12 months old, despite there being many Ghanaians above that age that do not have birth certificates. It is also restricted to one telecom company at this point.

Due to the centrality of the birth registration to proving citizenship, it has attracted

partisan contestations. For example, in 2018, the opposition party, the NDC, accused the government of manipulating personnel postings at the BDR in the Volta Region as a way of controlling access to the birth certificate.⁵¹ There will be general elections in December 2020 and the Volta Region is a known stronghold of the NDC. As the birth certificate is central to accessing the Ghanacard and Voter ID card, the NDC is concerned that the NPP will use its incumbency to shape ID politics in its favour.

Box 5 – Birth Registration

Our focus group discussions and interviews with women and girls showed the importance placed on birth registration. It was noted that the birth certificate helps citizens to access particular services such as health insurance, the Ghanacard, and Voter ID card. Participants also indicated the use of their birth certificate to enrol in primary, junior high, and senior high schools.

“The birth certificate is important because it is evidence. Because you can lie that you’re this and maybe you are not that so you will be asked to present any evidence that shows that you are Adjoa and maybe 18 years so the birth certificate is evidence.” **Akosua, 18**

“Well it is important to me because when I was going to do my GhanaCard, I sent my NHIS card. There was a woman who said she couldn’t accept it because it was not enough to fill the forms so I had to go and do the birth certificate and bring it, so it has a lot of benefits for me.” **Blessing, 17**

“The birth certificate I think runs through all the IDs because the passport like this you have to get a birth certificate before it can be done.” **Priscilla, 18**

Voter ID

The Voter ID card is the main tool for citizens to exercise their voting rights and participate in choosing who should steer the country’s development path. There are currently an estimated 17 million registered voters.⁵² This implies over 50% of the population of Ghana (31 million) are on the voter register. Though Ghana’s national elections are generally touted as peaceful, there are reported cases of duplicate registration, minor, and foreigner registrations on the electoral roll.

Concerns about the accuracy of the Voter ID card have often led to heated political debates that particularly center around issues of citizenship and exclusion. As discussed in Box 2, political parties in Ghana often take the lead in framing and pursuing these debates. However, civil society organisations and the media have also engaged in contestations relating to the voter ID.

For example, in the first quarter of 2020, the Electoral Commission proposed to compile a new voters’ register. On this matter, civil society organisations and other interest groups have

⁵¹ Minority NDC raise concerns over dismissals at Ho births and deaths registry. [GBC Online](#). 10 July, 2018

⁵² Kojo Pumpuni Asante. The COVID-19 Pandemic and its Implications for the Conduct of the 2020 Elections in Ghana. [MyjoyOnline](#). 14 April, 2020

raised a number of concerns relating to cost, timing, necessity, and data accuracy.⁵³ Together, the concerns of political parties, CSOs, and the media about the voter ID show how central the latter has become in the determination and experience of citizenship.

National Health Insurance ID

The National Health Insurance Card is issued by the [NHIA](#) to enable access to free healthcare services under the NHIS. Currently, an estimated 12 million Ghanaians, about 40% of the population, have active membership under the scheme.⁵⁴

In 2013, the NHIA deployed biometric technology to control access to health services and to fight identity and claims fraud associated with the scheme. Where there is no biometric verification device, photo verification is used. The NHIA has also introduced a phone-based non-biometric verification service. These efforts support the inclusiveness of the NHIS.

While the card has generally served as a de-facto foundational card, in 2014, a Supreme Court ruling disallowed the use of the card as proof of identity during voter registration. The ruling was on the basis that the scheme by law was accessible to foreign residents in Ghana and as such was not a solid enough proof of citizenship.

Due to exemption clauses, less than 75% of the health insurance scheme members pay premiums. The financial viability of the scheme is continually being threatened by the constricted funding sources, increasing enrolments, and increasing debt owed to healthcare providers. The increasing indebtedness of the scheme to healthcare providers is also affecting the acceptability of the card by providers.⁵⁵ There is a risk that, where heavy out-of-pocket payments

remain the case even for the insured, the most vulnerable persons may see little value in accessing the NHIS card.

Driver Licence

In 2016 and 2017, a total of 100,169 licences were issued and it is estimated that 415,727 licences will be issued between 2018 and 2021.⁵⁶ The process of acquiring a Driver Licence has until recently been fraught with delays and corruption.⁵⁷ Often, persons who wish to acquire the driver licence, out of ignorance or fear of possible failure, resort to the use of middlemen also known as ‘Goro Boys’. This practice makes the acquisition of the Driver Licence more expensive and has led to the production of fake cards. Fake licences, fake roadworthy stickers, fake number plates, and fake documents undermine the government’s revenue margins and personal and national security.

In November 2017, the [DVLA](#) began issuing smart driver licences. The new digital card fast tracks the acquisition of new driver licences as applicants are now able to obtain it within two to four weeks of application. The digital driver licence is part of the government’s efforts to improve enrolment efficiency and to remove the human interface from the process of issuing new licences which the ‘Goro Boys’ had taken advantage of. The government has also marketed the new digital licensing regime as one of its primary achievements in fighting public sector corruption.⁵⁸

Passport

The Ghanaian passport has seen little contestation in terms of its use as proof of citizenship in accessing public and private goods and services. However, there are practical challenges in accessing the passport even for qualified persons.

⁵³ Emmanuel Bonney. No need for new voters register - 18 CSOs to EC. [Graphic Online](#). 16 Jan, 2020.

⁵⁴ Mobile Renewal Service drives NHIS membership-Authority. [Ghana Business News](#). 22 December, 2019

⁵⁵ Francis Appiah. ‘Cash And Carry’ Back As Private Hospitals Threaten To Cut Services Over NHIA Debt. [Modern Ghana](#). 18 June, 2019.

⁵⁶ Medium Term Expenditure Framework(MTEF) for 2018-2020-Programme Based Budget Estimates for 2018 Ministry of Transport((See page 26). [Republic of Ghana Ministry of Finance](#). 2017

⁵⁷ Pulse Ghana Admin. DVLA most corrupt institution-GII report. [Pulse Ghana](#). 15 June, 2017.

⁵⁸ Corruption at DVLA no more-Bawumia. [GhanaWeb](#). 15 June, 2019.

For example, in a country where many citizens do not have birth certificates, proving citizenship has been a consistent barrier.

Again, accessing a passport comes at an additional cost for rural Ghanaians as passport centres are only sited in a few urban areas. These are the same rural populations that have relatively less access to birth registration systems.

Staff members at the passport offices and non-staff persons have exploited longstanding delays with passport applications (Ghana Anti-Corruption Coalition, 2017). This is similar to what happens at the DVLA. Staff promise to help applicants to get their passports ‘more quickly’ and in this sense, access to passports can become more expensive if an applicant seeks to navigate the institutional inefficiencies.

Currently, as a way of solving the problem, part of the passport application process can be started online and continued at premium passport application centres in urban locations.

The National ID

By the end of 2019, 5.9 million Ghanaians had been registered for the National ID.⁵⁹ It is however unclear whether the cards have been issued to all registered persons as there have been claims of delays in issuance⁶⁰ The NIS is the main identification repository/database of all citizens and legally resident foreigners in Ghana. It is the creation of an Act of Parliament and it is intended to be the foundational credential that facilitates access to most Government to People (G2P) and private sector services.

The system is designed to help integrate and harmonize data collected within Ghana’s fragmented IE. Applicants with credentials such as Driver Licence, National Health Insurance card, [TIN](#), passport, and Voter ID card are required to submit them for capture during

enrolment. For this reason, the system has been marketed as a cost saving initiative by limiting the glut of cards issued by various government agencies.

The NID, also known as the Ghanacard, is widely seen as the ‘ultimate’ identity credential, both in symbolic terms– verifying one’s status as a ‘true Ghanaian’ – and functional terms – as an official, powerful, and universally-accepted form of ID. However, it is often excessively difficult to access, with many encountering real challenges (See Box 1 and the Civil Society section of the report) during the enrolment, personalisation, and issuance processes.

In 2007, a year after the establishment of the NIA, an international competitive tendering process was opened for the selection of technical solution provider. SAGEM (later Safran Morpho and recently Idemia) was selected. SAGEM subcontracted two Ghanaian companies to assist with the implementation —Margins Group and Sambus. However, the registration exercise came to a halt in 2009 due to constraints including: technological revisions, funding, and a change in government leading to changes in leadership at the NIA. The present project has Identity Management Systems (IMS) II, a subsidiary of Margins Group as the private sector partner.

Alongside harmonising Ghana’s IE, the government has promoted the Ghanacard as needed for the formalization of the economy.⁶¹ It will supposedly help to widen the tax net and enable financial inclusion for the unbanked.⁶² The Bank of Ghana has also stated that the system will enhance financial security by making digital payments secure and mitigate identity fraud.⁶³

The intended major significance of the national ID card matches the nature of political contentions surrounding the project. These include various allegations of corruption levelled

⁵⁹ 5.9 million Ghanaians registered for Ghana Card so far – NIA. [GhanaWeb](#). 6 January, 2020

⁶⁰ Pamela Annang. Why some applicants are yet to get their Ghana Cards - NIA boss explains. [Graphic Online](#). 9 January, 2020

⁶¹ Don’t Compromise National ID Data-Akufo-Addo To Stakeholders. [Modern Ghana](#). 11 January, 2020

⁶² NIA Believes National ID Will Enhance Ghana’s Domestic Revenue. [News Ghana](#). 30 March, 2018

⁶³ GhanaCard apt for security in financial sector – BoG. [GhanaWeb](#). 2 September, 2019

against whoever oversees the project at any time by partisan actors and sometimes the media and civil society bodies. For example, as discussed earlier, there have been allegations that the vendor procurement process was corrupt.⁶⁴ Such suspicions contribute to the changes in leadership at the NIA whenever a new government assumes office.

Access to the Ghanacard has been challenged by two pieces of legislation. The first is a recent requirement for citizens to present a digital address when registering. By design, the digital address is to be self-generated. In a country where internet access and digital literacy are not unevenly distributed, such a requirement could undermine access to the Ghanacard. However, the government's decision to support a nationwide generation of digital addresses for all homes at no fee to citizens is helpful.

Second, a law barring the use of the Voter ID as proof of citizenship could also undermine access

to the Ghanacard. This is especially the case because the Voter ID is likely the most widely held credential in Ghana. In recent times, the NDC has warned the government and the EC against considering the national ID card for national elections.⁶⁵ But the government and the Electoral Commission have signalled that the Ghanacard and passport are likely to be the acceptable proof of citizenship during voter registration.⁶⁶ Thus, the NDC fears that mass registration for the card will be politically disadvantageous if it excludes persons, especially those from its strongholds.

Overall, the national identification card has the utility of ending the issuance of multiple ID cards issued by various government agencies. This cost-saving system could also help improve the accountability of how government bodies collect, store, use, and share citizens' personal information. However, it is important to ensure that legislation and implementation practices relating to the uses of, and access to, the card and its data are not exclusionary.

Box 6 – Proximity to International Borders and Registration for National ID Documents

Our focus group discussions found that people living in communities closer to international borders in Ghana, especially those that share common tribal names with those living across them, face peculiar challenges when registering for national ID credentials.

“When I was doing my Voter ID they asked me for my birth certificate and I said my parents did not do some for me. Then they asked me many many questions about my parents and whether they are not from Burkina. One elderly man came to confirm I was born in the community and parents are from there too before they did for me”. **Mamuna, 33.**

“I am an Ewe from the Volta region but my nursing profession brought me here. During my registration for both the voter and national ID, the registration officers I met at the two different instances all doubted my presence here [Widana, Pusiga District near Ghana-Togo border]. They said what shows that I am not Ewe from Togo staying in Ghana. I had to explain everything about me and finally showed them my nursing staff ID card before they continued my registration”. **Gbolonyo, 26.**

About half of the participants from border communities have birth certificates. They indicated that their parents registered them to distinguish them from those across the border. Discussions also indicate that some individuals acquired their birth certificate after the age of one.

⁶⁴ I never received bribe to award ‘Ghana Card’ contract-Prof Attafuah. [GhanaWeb](#). 3 June, 2018

⁶⁵ 2020 elections: We'll resist any attempts to use Ghana card for voting-NDC. [GhanaWeb](#). 7 August, 2019

⁶⁶ EC moves to make Ghana Card, passport acceptable for registration into electoral roll. [MyjoyOnline](#). 17 March, 2020

“My name either the Sani or Alhassan is also found in the communities just across the river [boundary] you see there. Because of that when I was registering for voter and national ID card it took me a long time and many questions from the registration man if I was not from Burkina Faso. I gave them my birth certificate at the centre but they still asked me several questions if I am truly a Ghanaian”. **Alhassan, 24.**

However, having close relatives that work registration officials can fast-track the application process by avoiding the formal application procedures or long queues:

“My uncle is a headmaster and was working as an electoral commission registration official, so the day I went to the centre I did not join the long queue, he told the other officials that, that is the niece and they just took me through the process and had the card and went home”. **Zuweratu, 28.**

SIM Card

In February 2012, Ghana’s Parliament passed the Subscriber Identity Module Registration Regulations (LI 2006). Specifically, the LI 2006 provides in its Article (1)(1) that a telecommunications company ‘shall not activate a Subscriber Identity Module for a subscriber unless the subscriber completes registration’.

Per the regulations, to register, subscribers must provide the MNO their name, residential or occupational address, date of birth, and a credential. The acceptable credential could be a driver’s licence, national health insurance card, passport, Voter ID card, Ghanacard or ‘*any other valid form of identification document the Authority [NCA] may determine...*’.

According to the NCA (2016), making SIM card registration mandatory serves key development objectives including: enhancing the ability of law enforcement actors to identify mobile phone users in order to track criminals and to curb ‘other negative incidents such as; loss of phone through theft, nuisance/hate text, messages, fraud, threats and inciting violence’. In this sense, there is a strong security rationale backing the introduction of SIM card registrations in Ghana. SIM registration has also been justified in socio-economic terms. SIM cards have become

critical for communication through voice and video calls and text messages. Even for ‘over the top’ messaging platforms like WhatsApp and Telegram, users still need a SIM card to operate an account.

The ability to participate in the national and global economy is also increasingly tied to SIM registration. In Ghana, for example, SIM cards serve as the foundation for the mobile money industry. Many phone users in Ghana have signed to a fintech product such as mobile banking or loan platforms. As of June 2018, the [Bank of Ghana](#) reported that there were about 30 million mobile money accounts with 11 million of them being active users (B&FT, August 2018).

As the government makes phone-based accounts and traditional banking accounts interoperable, SIM registration is often presented by governmental actors as promoting financial inclusion for the unbanked. Mobile interoperability is being led by the Ghana Inter-bank Settlement Payment Systems in collaboration with the banks and the MNOs.⁶⁷ The MNOs have been encouraged by government to invest in interoperable systems. This is important as about 7.3 million Ghanaians remain unbanked and employed in various sections in the informal sector.⁶⁸ Various MNOs in the country have taken advantage of the mobile interoperability

⁶⁷ Mobile Money Interoperability FAQs. [Ghana Interbank Payment & Settlement Systems Limited \(GhIPSS\)](#). Accessed 27 May, 2020

⁶⁸ 7.3m Ghanaians without financial account-World Bank. [Goldstreet Business](#). 29 May, 2018

platform to the extent that at the end of the first quarter of 2020, mobile money transfers across networks had shot up by 358% in comparison to the first quarter of 2019. The mobile economy gives them opportunities to deposit, transfer and withdraw money, and pay for services more easily. Loan products like MTN's Qwik Loan are also now accessible through mobile platforms. Governmental actors thus, also justify SIM registration as a means of ensuring security and trust for mobile products, as it assures that all users of mobile phone products can be tracked. In other words, criminals who abuse mobile phone platforms can be traced and punished where an effective SIM registration regime is in place.

Section 73(b) of the Electronic Communications (Amendment) Act, 2016 makes the issuance and use of pre-registered SIM cards a punishable offence. Nonetheless, SIM registration has been undermined in Ghana by the sale of pre-registered SIM cards. The Consumer Advocacy Centre has sued the NCA and the MNOs for this phenomenon.

This challenge has recently informed the decision by the government to embark on a re-registration exercise.⁷⁰ Citizens are to re-register their SIM cards or lose their phone numbers by June 2020. Yet, some political party operatives, on the basis of necessity and causing registration fatigue amongst citizens, have challenged the re-registration exercise.⁷¹

The GSMA through its Digital Identity Programme has been advocating and raising awareness on the opportunities of mobile-enabled digital identity and life-enhancing services.⁷² They have worked with mobile phone operators, governments, and the development community to demonstrate

these opportunities while addressing the barriers and highlighting the value of mobile phones as an enabler of digital identification. For example, MTN Ghana committed to having at least 45% of its registered Mobile Money customers as women, as part of the GSMA's Connected Women Commitment Initiative.⁷³ This initiative by the GSMA promotes a gender inclusion dimension in conversations about ownership and use of mobile phone products.

There is no doubt that proof of identity is a prerequisite to socio-economic development and essential to accessing basic services. In light of the coverage and use of mobile telephones in Ghana, mobile technologies are uniquely positioned to enable access to services and inclusive digital identity. It is, therefore, important that the government continue to explore its potential.

Conclusion

There are several functional credentials within Ghana currently being used as foundational IDs. This issue stems from the weakness of the IE's CR regime, especially access to birth certificates. The Ghanacard, which has been designed as a one-stop solution to curtail the duplication of government-issued cards is yet to achieve its objective due to stalled registration exercises. Whilst SIMs have the potential to promote financial inclusion, it will be important to ensure that the continued sale of pre-registered SIM cards does not undermine the potential of the regime. Viewed together, these ID systems will play a critical role in the development agenda of Ghana regardless of their current limitations and the political tensions that sometimes surround them.

⁷⁰ K. Effah. Re-register your SIM or lose mobile number-Ursula. [YEN](#). October 2019

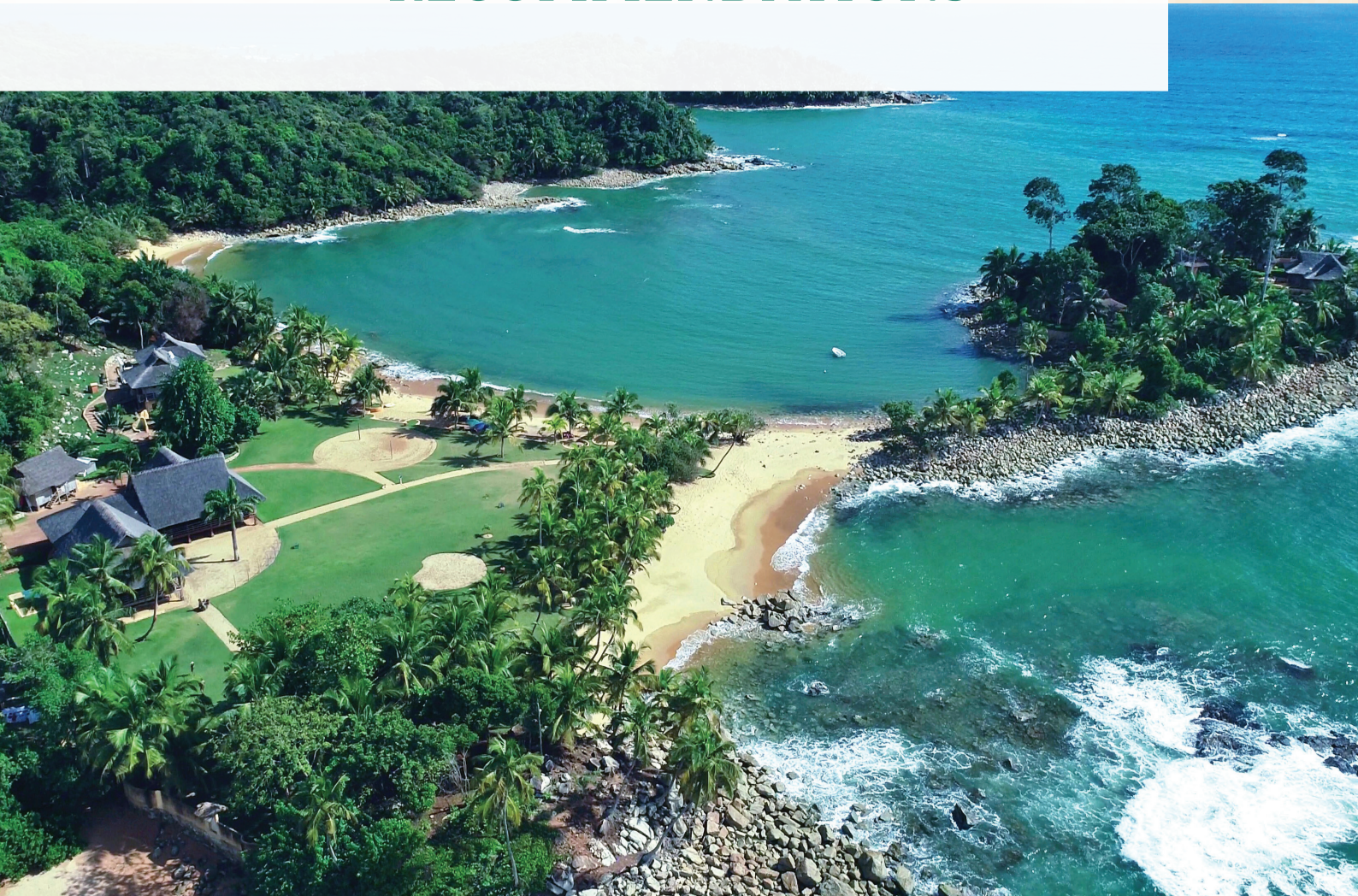
⁷¹ Aba Fuseini. Gov't directive for sim re-registration unnecessary. [MyjoyOnline](#). 16 October, 2019.

⁷² Digital Identity Program- Enabling digital identity through the power of mobile. [GSMA](#). Accessed 27 May, 2020

⁷³ GSMA. Mobile for Development - MTN Ghana. [GSMA](#). Accessed 1 June, 2020.

08

RECOMMENDATIONS



This report has mapped out Ghana's IE and discussed the major ID systems within it. Clearly, the IE has a very complex structure comprising of several different actors, ID systems, and supporting legislation. At its heart are several projects that have been promoted by governmental actors and their partners as necessary for national security, economic growth, and citizens' access to public goods and services. Among them are efforts to rationalise government-issued credentials through the Ghanacard and the SIM cards which are currently driving the country's emerging digital economy.

While these and other ID systems may bear positive fruits in the years to come, they could also individually and collectively threaten the enjoyment of citizenship and privacy rights. Accordingly, it remains necessary that as governmental and non-governmental actors conceive, argue over, and implement ID systems, they find the balance between reaping the benefits of a registered and visible population, and ensuring that such advancements do not contribute to social exclusions and arbitrary surveillance practices.

The Ghanaian government's decision to provide free access to major ID projects such as the National ID card, Voter ID, and NHIS presents a model that other countries in the Global South could draw on. Despite these efforts, there are still various aspects of Ghana's IE that can be improved. In what follows, we provide recommendations on how government actors, CSOs, and development organisations can help secure the benefits of Ghana's ID systems, whilst curtailing the risks and vulnerabilities they can engender.

Governmental Actors

Institutional Synergies

A great challenge within Ghana's IE relates to the multiplication of ID systems by functional governmental bodies. The EC, NHIA, DVLA, the SSNIT all have their own ID registers and credentials. This has resulted in 'turf wars' and the absence of institutional synergies that could increase access, save money, and support development.

Such ID proliferation has adverse consequences especially in terms of cost, citizen registration fatigue, and the risky dispersal of citizens' sensitive information. Positively, the Ghanacard can hold fourteen different applications. Thus, it is an opportunity to finally halt the glut of government issued credentials. However, in doing this, the government and the NIA must ensure a model in which its agencies can only access as much information on the Ghanacard as is relevant to their specific legal mandates. This will help to ensure that the personal information of citizens is protected.

Similarly, the Birth and Death Registry and the NIA should aim to synchronize the births and deaths register and the national identity register. This would save taxpayers the huge cost of operating and maintaining multiple public-sector ID systems. To organisations and individuals, the inconvenience and cost of enrolling, renewing and using multiple IDs will also be reduced. Political consensus is key to realizing this objective.

Social Exclusion

ID systems can easily lead to the exclusion of various categories of persons from accessing public and private services, and human rights more generally. In Ghana's case, the exclusionary potentials of ID systems exist in two main ways: through legislation and access channels.

First, in the government's bid to establish and promote the use of certain ID systems, there is the need to avoid legal provisions that (in)advertently permit social exclusions. For example, insisting on a digital address for Ghanacard registration, and barring the use of the Voter ID card as proof of citizenship has caused much trouble for citizens during the Ghanacard's registration drives. While the government has embarked on a nationwide house numbering and tagging exercise that may address such issues, the saga presents a key lesson in writing ID policies that prioritize citizenship rights over speedy completion.

The second relates to the difficulty with accessing registration channels. This is especially the case with birth registration in Ghana. It is important that governmental actors expand access to the UNICEF-supported model of mobile phone-based birth registration. As birth certificates are at the heart of proving citizenship in Ghana, it is necessary for the government to adequately resource the Birth and Death Registry to register all births across Ghana. The poor access to birth registration also undermines citizens' access to other critical IDs, especially passports.

The Ghanacard's registration process has also been riddled with challenges in the form of delays in registration and card distribution that has negatively impacted individual access. These challenges are disincentives to citizens who seek to register. Here, it is important for the NIA to revisit its online component to allow citizens to submit information before they appear at registration centres to complete the process. Citizens who are not digitally savvy enough could be provided with some support in filling online forms. This would also reduce the real cost of transactions involved in accessing the Ghanacard.

Data Protection and data sovereignty

Governmental actors should ensure the sovereignty of public sector databases. This entails exploring measures that allow for increased Ghanaian authority and control over ID systems, technologies, and databases, whilst minimising access and control by third-party (often foreign) service providers. As shown in the dealings between the EC and STL, as well as Bsystems, a by-product of the government's public-private partnership agreements in the IE has been that private partners have access to very sensitive citizen data. Such an arrangement lends itself to dubious uses of citizen data and could also threaten national security.

Governmental actors must also ensure that public sector databases are not owned by private entities and that private sector partners have limited access to such data. The role of private partners should also be clearly defined in PPP agreements such as: where the database is situated, access to the database, and technology escrow in cases of conflicts. This will eliminate vendor-lock-in, and the sale and sharing of data for other purposes than it was originally intended. The Data Protection Commission, CSOs and other third-parties such as banks, and technology escrow providers, must collaborate in ensuring that the personal information of citizens are always protected.

Transparency and public buy-in

Major government procurements items including ID systems are often fraught with allegations of corruption that tend to feed into the unhealthy politicization of useful initiatives by the Ghanaian government. Government agencies, policy-holders, and practitioners associated with planning, designing, and procuring ID systems should ensure that such activities are transparent and involve key stakeholders such as the media, CSOs, and opposition political parties.

As part of the procurement process, government should minimize sole-sourcing and restrictive tendering processes which create the perception of corruption. Also, right from the planning stages, government should engage key stakeholders

such as CSOs and other government agencies, in designing the systems to be acquired. They should also engage technical experts to clearly define the technical specifications for the acquisition of the system and eliminate reliance on vendor-defined terms of reference.

Open and broad consultations engender public trust and support for government-issued ID systems. Such transparency also permits the government to take into consideration the experiences and critical perspectives of non-governmental actors right from the onset of ID projects.

Development Organisations

While development organisations support the institutionalisation of various ID systems in Ghana, they should also invest resources in deepening accountability mechanisms relating to the IE. Accountability mechanisms can be enhanced by supporting the work of the Data Protection Commission and helping CSOs in the IE space with funding and technical support. This should include specialist training and diagnostic tools to more fully appreciate the threats and opportunities that come with ID systems.

Development organisations can also make a significant contribution to Ghana's IE by helping government to give due attention to improving the weak CR system and making it interoperate with the NIS. These two critical ID systems can provide an authentic source for validating a person's identity and citizenship. Their interoperability will help achieve a common ID verification system needed to effectively fight identity fraud and related crimes associated with both public and private sector services. The additional benefit will be the creation of a national population database to support public-policy formulation and implementation. Generally, development organisations such as the World Bank are also better able to channel resources where there is reliable citizen data.

Development organisations could also draw lessons from UNICEF's approach to the M-Birth project. M-Birth attempts to resolve the root challenge within Ghana's IE: the disparate access to birth certificate. If development organisations invest more in broadening citizens' access to

foundational IDs, over time, the capacity to prove citizenship will increase for all citizens including persons in non-urban areas. Also, the use of a mobile-based solution makes accessing birth registration simpler, a goal that development organisations should promote as they support ID projects in Ghana.

Notwithstanding the positives of the M-Birth project, its impact will be stronger if registration is not limited to only babies from age 0 to 12 months. This move will be beneficial as many Ghanaian children beyond age 1 are still without birth certificates. Also, the involved MNOs should be expanded beyond one (AirtelTigo) to enable all forms of mobile networks to be competent for birth registration.

Civil Society Organisations

CSOs should invest resources into improving their technical capacities to critically analyse the intricate functions of ID systems. Building partnerships with privacy experts as well as technologists is one way to do this. A better appreciation of how data is collected and used will strengthen the ability of CSOs to fully articulate the dangers of IE systems and demand changes from the state. Moreover, CSOs will then be in a better position to explain the negative effects of IE systems, as well as how to navigate them, to everyday citizens.

While CSOs in Ghana have shown consistent interest in issues relating to Ghana's IE, there is the need to diversify the issues that they focus on. Understandably, the rarity of IE-focused CSOs in Ghana has meant that IE issues are often articulated by CSOs that are interested in broader governance, accountability, and electoral matters. In this sense, there have been gaps, such as comparatively little emphasis on the peculiar challenges faced by women, girls, and other vulnerable groups as they navigate the legalities and practicalities of Ghana's IE.

However, CSOs must not only speak about the dangers of a mismanaged IE; they must also collaborate with the state and other actors to help vulnerable persons to understand the benefits of registration. In this, CSOs could find a natural ally in the Ministry of Gender. As a starting point, CSOs can draw on our focus group

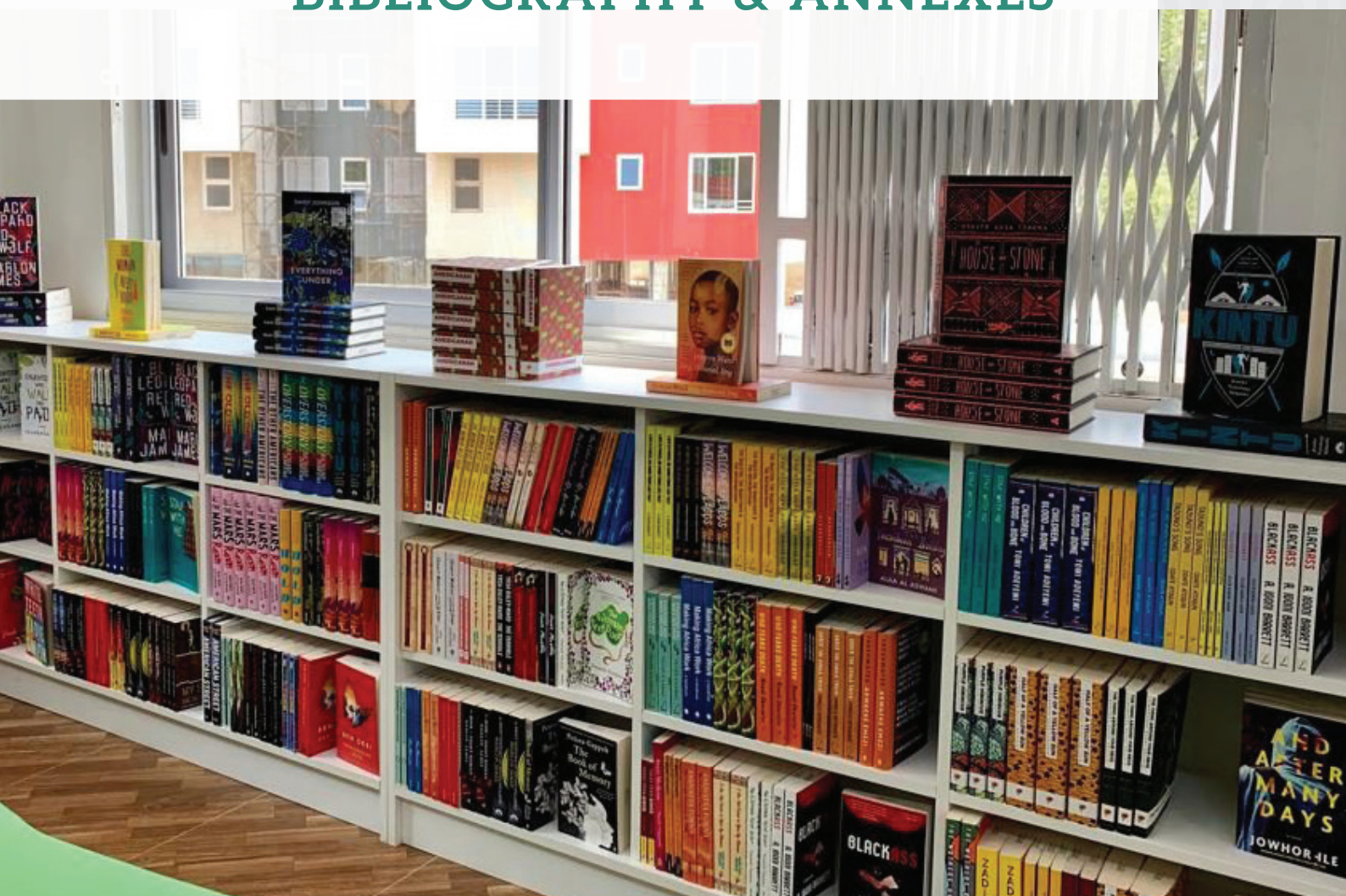
discussions with women and girls to appreciate the dynamics of the challenges they face.

As seen in Kenya, CSO to CSO partnerships for canvassing concerns about ID systems and advocating solutions could also be a template for Ghanaian civil society and media bodies. To do this, Ghanaian CSOs can retool the longstanding collaborations they have built amongst themselves over the time for articulating governance issues and pressuring governmental actors for changes.

In this regard, it was interesting to witness the coalition of 18 CSOs including the Ghana Anti-Corruption Coalition (GACC), IMANI Africa, SEND Ghana, Africa Centre for International Law and Accountability (ACILA), Financial Accountability and Transparency, Africa (FAT-Africa), and Media Foundation for West Africa (MFWA) calling for transparency in the procurement of ICTs for the new voters' register.⁷⁴ This approach can be an effective model for civil society activism in Ghana's IE space, and could be further formalised.

⁷⁴ Emmanuel Bonney. No need for new voters register - 18 CSOs to EC. [Graphic Online](#). 16 Jan, 2020.

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Annex 1 - Risks & Vulnerabilities Analyses

Identity Ecosystem

Exclusions and Access	Privacy	Costs	Politics
Does the IE have a legal framework that guarantees uniform critical ID related rights and policy guidance?	Does the state have existing or planned national privacy laws that conform to international standards*?	Is the coverage of primary identity infrastructure (e.g. electricity, mobile phone and internet services) uniform or limited?	Is there an active and free civil society that debates identity systems and holds the government to account?
Yes. Details on the constitution, birth registration and the national ID can be found in separate tables below.	Yes. Ghana's Constitution (Article 18 (2)) guarantees the right to privacy. The Data Protection Act, 2012 (Act 843) (DPA) also provides for the process to obtain, hold, use or disclose personal information and related issues.	<p>According to the 2016 World Bank collection of development indicators, Ghana has a 54.68% urban population. This population cannot be said to be enjoying uniform primary identity infrastructure. The situation gets worse for the rural population.</p> <p>With reference to the same report, 66.6% of the rural population have access to electricity and 89.8% of the urban population have access to electricity.</p> <p>With regards to mobile phone and internet services, the 2017 GSMA Country overview: Ghana Driving mobile-enabled digital transformation report indicated that Ghana has close to 19 million unique mobile subscribers – equivalent to 67% of population and 45% of the population can access the internet via mobile.</p>	There are some civil society organisations that have questioned the budget for the national ID programme. They have raised issues with the fragmented nature of ID systems and made recommendations to the government on several occasions.

Do state or non-state organisations routinely discriminate against citizens seeking to access ID systems?	Are there security-related laws that water down existing protections or make them irrelevant?	How siloed, federated or centralised are the IE's individual identity systems?	Is there evidence of the state mis-using identity systems for political gain?
It exists, but not rampant. There have been some isolated cases of some citizens who bear the Ewe tribe names or live closer to the Togo border being taken through an onerous vetting process. Many individuals are also experiencing difficulty registering due to long distances between registration centres and their homes and the inability to provide fingerprints due to manual labour.	Not particularly. There are standard exemptions as provided in the Constitution as well as the DPA which allows for some derogations for public interest, public morality and national security. These derogations are not general but must be implemented within certain frameworks meant to protect the interest of the individual.	There are highly siloed individual identity systems in the IE. Almost all the key ID systems are not linked to any foundational ID. There is some effort from the private entities in the ecosystem to provide verification services for some of the functional ID.	There were some media reports of the Electoral Commission's register being used by political parties to send targeted messages ahead of the 2016 general elections.
Do ID authorities routinely discriminate against non-citizens seeking to access ID systems?	Do law indicators suggest that relevant legislation is poorly implemented?	Is there evidence of widespread corruption related to identity systems?	Is the state fragile in ways that suggest systems and data could be rapidly compromised or misused?
No	Yes	<p>There have been many reports in the media especially about corrupt practices in relation to the national ID programme and a recent dismissal of the Bank of Ghana staff who was to oversee the interoperability project within the banking sector.</p> <p>There has also been a recent media report on the sale of data by the Electoral Commission to private IT firms.</p>	<p>Ghana is considered 110th on the Fund for Peace's rankings – warning status out of 178 States.</p> <p>There is also high probability of the national ID systems being compromised in one way or the other for mostly political expediency.</p>

Does the state actively make citizens aware of their entitlements and rights related to identification?	Are external actors (e.g. foreign governments or companies) known to be interested in compromising state data repositories?	Does a single register link all foundational and functional identities for the duration of a person's lifetime?	Is there an autonomous agency that coordinates all citizen data activities and acts as a 'guardian' of the citizen database?
Yes. The government is currently using various media channels to educate the citizenry on the need to have an identification card, especially the National ID.	No	No	No. The fragmented ID systems are managed by the various agencies that created them. There is no data integration and harmonization.

*The European Unions' General Data Protection Regulation (GDPR) applies to all individuals within the European Union and the European Economic Area, and also addresses the export of personal data outside the EU and EEA areas. The OECD Guidelines on the Protection of Privacy and Transborder Flows of Personal Data (FIPs) form the basis of many national privacy laws and can be a good starting point for assessments of legal frameworks. See note 6, Chapter 5 of Gelb and Metz (2017).

Constitution

Does the constitution contain a definition of citizenship?	Does it provide a right to a name and nationality?	Does it provide rights to register with foundational ID systems?
Yes, Article 6(a) of the 1992 Constitution of Ghana defines citizenship.	The constitution does not stipulate the right to a name and nationality. However, there is an Act that guarantees this right.(The Children's Act, 1998/ Act 560)	N/A
Does it guarantee free compulsory education?	Does it have provisions for gender equality?	Does it contain rights to privacy?
Yes. Article 25(a) of the 1992 Constitution guarantees free and compulsory basic education.	Yes. Article 17 (1) and (2) states that all persons are equal before the law, and no one should be discriminated against on the basis of gender, race, etc.	Yes. Article 18 ensures the right to privacy

Birth Registration

What is the relevant legal instrument?	Which parent can register?	Are the parents' national IDs required for registration?	Do parents have more than 30 days to register without penalty?
Section 2, Registration of Births and Deaths Act, 1965 Act 301	Either of the parents is permitted to register.	No.	Yes.
Is there a fee for late registrations?	Are birth witnesses required by law?	Are birth witnesses required in practice?	Are the services that are accessible with a birth certificate listed in the legal instrument?
Yes, Ghc 50.00 fee is charged for late registration (12 months or later after birth)	Yes	Yes. There should be a confirmation of the birth to be registered with a documentation prepared by the hospital or a traditional birth attendant.	No.

National IDs

What is the relevant legal instrument? (should already have on the E map)	Is there a prescribed period within which to apply for a national ID after reaching the prescribed age?	If yes, is there a late registration fee?	Are witnesses required by law when applying?
The National Identity Register Act, 2008 (Act 750)	No.	N/A	Witnesses are required only when an applicant is not having the mandatory enrolment document (birth certificate or valid passport)
Are witnesses required in practice?	Is a birth certificate required when applying for the national ID?	Are there alternatives to a birth certificate when applying for the national ID?	Is a national ID required to access state services?
Witnesses are required only when an applicant is not having the mandatory enrolment document (birth certificate or passport)	Yes.	Yes. In the absence of a birth certificate, a passport or an affidavit completed by a Commissioner for Oath at a registration centre.	Yes. The NID is mandatory for all transactions that require identification. But it is currently not been complied with by many institutions.

Women and girls

Exclusions and Access	Privacy	Inclusions and Rights	Politics
Are there social norms that make it difficult for women to interact in the public sphere or with authorities?	Are women uncomfortable sharing data that is routinely asked for to obtain the national ID? If yes, what kind of data and why?	Do women need a foundational credential to open a financial account: bank or mobile?	Are there legal stipulations that restrict women from acting as the sole referees for their children's access to IDs?
N/A	A few women stated that they were uncomfortable when asked to share information about their marital status(See Box 3)	No. Women can open such accounts without a foundational ID. For instance, to register for mobile money accounts, women need to present a valid photo ID and to register for bank accounts, women can present a valid proof of identity or valid photo identity	No. For example, either the mother, father or both can register the child for a Birth Certificate. Additionally, Article 17 (1) and (2) of the constitution states that all persons are equal before the law, making it possible for women to have equal rights to men.
Are there social norms that prevent women from using the technology underpinning ID systems (e.g. women are prevented from having mobiles or not taught to use computers)?	Are women uncomfortable sharing data that is routinely asked for to obtain a marriage certificate? If yes, what kind of data and why?	Are birth certificates required for girls trying to prove they have been forced into an underage marriage?	Are there domestic civil society organisations focused on women's identity issues?
According to a report by the Media Foundation for West Africa, less than 20% of women in Ghana have access to the internet. The report stated that factors such as body shaming, cyberbullying, threats of rape and revenge pornography contribute to this problem.	N/A	Birth certificates are needed in order to ensure the successful prosecution of cases of underage marriage. Without birth certificates, judges face difficulties when trying to determine the age of the child in order to demonstrate that they are truly underage.	No

<p>23% and 24% of women who participated in a survey claimed that the cost of sim cards/handset and phone credit respectively is a factor that prevents them from having access to phones. Girls tend to be socialised in a way that deters their interest in science and technology largely because it is considered an area/field for boys. This socialization is seen in the kind of toys girls are given to play with when they are little.</p>			
<p>Are groups of women routinely excluded from accessing foundational ID systems (the poor, migrants, unmarried, widowed, particular ethnicities etc)?</p>	<p>Are women uncomfortable sharing data that is routinely asked for to obtain a birth certificate? If yes, what kind of data and why?</p>	<p>Are there outreach efforts to ensure women can access state IDs (e.g. mobile national ID registration vans or health workers able to conduct birth registration)?</p>	<p>Is there a difference in women and men's abilities to access ID systems' accountability mechanisms?</p>
<p>Volta Regional executives of the opposition National Democratic Congress(NDC) have accused the National Identification Authority(NIA) of discriminating against Voltarians during this year's National ID card registration.</p> <p>In May 2019, a Ghanaian leveled a case against the Electoral Commission, stating that the commission's decision to allow online voter registration for</p>	<p>No. Our FGD revealed that they trust the government and have no concerns sharing their personal data with them.</p>	<p>Yes. Tigo in partnership with UNICEF and the Birth and Death Registry has initiated an Automated Birth Registration System which operates both online and offline.</p> <p>In some communities, door-to-door birth registration sometimes takes place as well.</p>	<p>No</p>

the limited registration exercise was discriminatory against rural Ghanaians.			
What ID credentials are required to access state welfare or benefits programmes (e.g. cash transfers for the poor)?	Are national IDs required to travel around a country?	What ID credentials are required to access public education?	Are there national gender policies in place that may promote women's inclusion in the IE?
The e-zwich card is required to access the Livelihood Empowerment Program(LEAP).No ID is required to access the NHIS. A Social Security Number(SSN) is required to access the Pension Scheme No ID card is required to benefit from the Ghana School Feeding Program(GSFP)	Currently, no. For domestic flights, a valid photo ID is required for travel. This can be in form of a passport, driver's licence, NHIS card, Voter ID. For traveling or moving around the country by land, no form of ID is required.	It could not be determined that it was a requirement for public education across all levels. However, Birth Certificates facilitate school enrolment. Additionally, in May 2016, the then Minister of Local Government and Rural Development stated that "Comprehensive birth registration system is the gateway for children to access education"	Yes. According to the NHIS Act 852, people requiring ante-natal, delivery, and post-natal health care are exempted from contributing towards the scheme. This enhances their participation in the NHIS. During the biometric Voter ID card registration process, pregnant women were offered special assistance. In the just ended National ID card registration process, nursing mothers were given priority, reducing the time they spent at various registration centers.
What ID credentials are required to access state health programmes (e.g. free health care)?	Are there examples of ID systems' data breaches used to blackmail, harass or shame women?	Is it possible to register for a SIM card using other credentials than the national ID?	Are there foreign civil society organisations focused on women's identity issues?
In order to access state health programs, one needs to be registered under National Health Insurance Scheme and obtain a National Health Insurance Card. The card must be presented upon	Our research did not yield any results to support this fact.	Yes. Currently, the national ID is not the only credential needed to obtain the sim card . One needs to present a valid photo ID card such as passport, driver's licence, Voter ID. The National	No

arriving at a health care facility in order to obtain the benefits associated with the card.		Communications Authority has however indicated that the national id/Ghanacard will eventually be used for sim re-registration.	
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National gender policies

Is there a national gender Policy?	Does the government set targets for women's inclusion across different sectors?
Yes. In August 2015, Cabinet approved the National Gender Policy. It provides policy guidelines, an institutional framework as well as strategies to advance women empowerment and gender equality in Ghana.	<p>There is currently no overarching law or policy ensuring female inclusion across sectors. However, in some sectors, targets have been set. For instance, 40% female representation is required in the political sphere. Additionally, for all the levels of government, women must occupy 30% of the decision-making and executive positions. At the district assembly level, there is also a 50% quota allocated to women.</p> <p>There is also a Draft Affirmative Action Bill that is yet to be passed into law. It is expected to address the issue of women representation across various sectors</p>
Are there dedicated resources (funds and staff) to gender mainstreaming?	Is there an oversight committee or authority that ensures progress towards these goals?
<p>Yes. In 2004, a fund was set up at the Ministry of to support women in local governance.</p> <p>In 2018, a capacity building workshop was organized for 28 Gender Desk officers and 40 officers in MMDAs on mainstreaming the National Gender Policy into the plans of MMDAs and MDAs</p> <p>Additionally, in 2018, the Ministry of Gender, Children and Social Protection was allocated a total budget of (GH¢738,097,673.00)</p>	Yes. The Department of Gender under the Ministry of Gender, Children and Social Protection is the authority for all issues pertaining to gender equality. It was set up by an Executive instrument in 2013, replacing the Department of Women. Ghana has a long history of advancing gender equality. In 1975, the government established the National Council for Women and Development and this was eventually replaced by the Department of Women. As part of its objectives, the Department of Gender implements government policies pertaining to women and ensures the promotion of women across the various sectors of national development.

National ID risks and vulnerabilities

Exclusions	Privacy	Costs	Politics
Are there physical registration points within reach of poor, rural or peripheral communities? Or are there alternative methods?	Is the system managed by foreign vendors?	For National ID systems: Was the start-up cost above or below the \$3-6 per person benchmark for low-income countries?³⁶	Was the system introduced through normal legislative channels?
The NIA has over 30,000 gazetted registration centres for the Mass Registration phase, most of which are closer to the poor and in rural communities. There is also an online platform where the application process could be commenced and completed in-person by visiting any of the registration centres.	It is managed by both the the NIA staff together with the local PP partner/host of foreign vendors.	It is estimated to be about \$8 per person	Yes.
Are there records of difficulties in acquiring any feeder documents required for registration?’	Do commentators or users say the collected data is beyond that required for the task?	For National ID systems: Is the annual maintenance cost above or below the benchmark of 0.1 of GDP or \$1.50 per person for low-income countries?³⁷	Does the system reveal trends or patterns that could be acted upon but have not (e.g. tax avoiders, ghost staff or benefit payments, voting irregularities etc.)?
There are several records of applicants who do not have either the birth certificate or valid passport (feeder documents) and have to go through the vouching process.	No	No data	No.
Does registration rely on social accreditation (e.g.	Does the system rely on a unique number that	Is the system part of a locked-in (e.g. the state or	Are there any reports of political

community leaders vouching for the applicant/user)?	reveals personal information to lay people?	company cannot exit the agreement) contract with a private vendor?	interference over the system?
Yes and that happens only when an applicant does not have either of the feeder documents (birth certificate or valid passport)	No. The system uses an algorithm to generate a unique Personal Identity Number (PIN) that cannot be interpreted by lay people.	The contract is a 15-year Public Private Partnership and vendor lock-in cannot be ruled out in the long run; more especially with the long duration of the contract.	There have been several reports of political interference right from the award of contract to the Private Partner. Apart from the appointment of the Executive Secretary (who is a direct political appointee), many other recent appointments are said to be based on political lineage – present government foot-soldiers and apparatchiks
Is the cost of registration considered too high by commentators or users?	Can users change the data stored by the system when desired?	Is the system adequately funded to support its maintenance (including any expansion plans)?	Does the system officially or unofficially share data with the state security services?
The cost of first registration is not directly borne by the applicant but there has been a huge outcry by CSOs concerning the high cost of the entire exercise charged to the nation's coffers.	Yes	There is an assurance that the private partner is adequately resourced to support the maintenance of the system for the 15-year duration before handing over fully to the government.	Data is only shared officially with the national security services when the need arises and a request is put through the Executive Secretary and receives the approval of the Governing Board of the NIA. The application for data normally goes through a rigorous scrutiny to avoid trampling on individuals' fundamental human rights.
Are there routinely unofficial payments/	Can users access records of how their data is	Does the system have a de-duplication process	Has any kind of public risk analysis been carried out

bribes for registration?	used and what additional data the system may aggregate from elsewhere?	that draws on data from other systems?	for the system by the authorities in charge?
Yes, there have been some complaints by some members of the public but none have been reported and proven to be true in any court of law.	No	The current system contains data ported from a previous (2008 – 2010) national identification mass registration exercise against which many of the data collected now are de-duplicated.	No.
Are there complex registration processes that require literacy, digital literacy or a specific language?	Can users remove themselves from the system?	Have there been any cases of corruption during the establishment of the system or its use?	Was and is civil society consulted on the system's use?
The process is not quite complex but there is the need to be fairly literate in English to confirm the information you provide are exactly what the registration form requires and recorded accordingly. In the absence of the applicant's literacy, it could be translated in the language of choice but that can introduce errors on the part of the registration official without the applicant's knowledge. Secondly, the online registration process requires some form of digital literacy to access.	No.	There have been several allegations leveled against the Private Partner concerning how it was able to get a sole-sourced contract from the government when it is believed that it has no satisfactory or requisite company profile for a programme of this magnitude.	There were civil society engagements prior to the mass roll-out of the system.
Does the registration process involve the collection of biometric data that	If the ID enables access to multiple services, does it ensure users cannot be tracked	Is money the system collects for registration, credentials or	Are any accountability mechanisms accessible to the

some cannot easily provide?	via a single number or identifier across them?	verification accounted for transparently?	public in place for the system?
Yes, the registration requires the collection of fingerprint, iris scan, photograph and signature/thumbprint. Due to the fact that many of the eligible adult population especially in the rural communities are manual labourers, there is a lot of difficulty in capturing their fingerprint since the minutiae are peeled off and in the case of children the minutiae is not properly developed.	Yes.	The system is yet to charge money for individuals' data updates, replacement of credentials and verification services.	The Auditor-General would publish audited financial reports on the NIA while complaints on any data breaches could be lodged at the Data Protection Commission or the Attorney-General's Department for redress. Civil Society Organisations may also source information from the NIA that may be of interest to the public.
Does the registration process force particular identities upon users?		Is it a 'one-shot' use system (e.g. an electoral roll) or can it be updated?	Is there an independent state authority that the system is accountable to?
No.		No. It permits continuous update.	No.
If the system is 'voluntary', will non subscription lock people out of particular vital state or non-state services?		Do the system's operators undergo standardised training?	
Yes. The registration Act makes it mandatory and non-subscription means an inability to provide a form of identification for any transactions that require that.		Seldom.	

Voter ID Risk and Vulnerabilities

Exclusions	Privacy	Costs	Politics
Are there physical registration points within reach of poor, rural or peripheral communities? Or are there alternative methods?	Is the system managed by foreign vendors?	For National ID systems: Was the start-up cost above or below the \$3-6 per person benchmark for low-income countries? ³⁶	Was the system introduced through normal legislative channels?
Generally, yes because polling centers which are used for registration are close to the residences. However, a limited registration exercises in 2019 took place at the Electoral Commission's district offices instead of the polling centers. Many applicants complained because the district offices were far from their place of residences.	Yes. A recent news report indicates that a foreign IT firm has been managing the country's elections data center since 2012. The EC chair was reported as saying that the foreign firm was given unfettered access to the data center and could shut down systems arbitrarily. The new EC leadership that came to office in 2018 has terminated the contract with the foreign firm and are now exploring having an in-house IT department take over.	Most likely yes. In a news report in 2019, according to the EC chair, the foreign IT firm that managed the elections data center since 2012 charged US\$5.2 million for maintenance and internet annually.	Yes.
Are there records of difficulties in acquiring any feeder documents required for registration?	Do commentators or users say the collected data is beyond that required for the task?	For National ID systems: Is the annual maintenance cost above or below the benchmark of 0.1 of GDP or \$1.50 per person for low-income countries? ³⁷	Does the system reveal trends or patterns that could be acted upon but have not (e.g. tax avoiders, ghost staff or benefit payments, voting irregularities etc.)?
Yes. However, the difficulties may have been reduced as other feeder documents apart from the birth certificate are now widely available.	Yes. A special audit of the EC by the Auditor General in 2018 revealed that the EC sold voter data to an Accra-based software development company who in turn sold the data to financial	The maintenance cost is below 0.1 of the GDP	The system has persistent voting irregularities including registration of minors, multiple registration, foreigners on the voter register and deceased people who remain on the register.

	services providers. The revelation was picked up by the Data Protection Commission for investigation.		
Does registration rely on social accreditation (e.g. community leaders vouching for the applicant/user)?	Does the system rely on a unique number that reveals personal information to lay people?	Is the system part of a locked-in (e.g. the state or company cannot exit the agreement) contract with a private vendor?	Are there any reports of political interference over the system?
No.	No.	No.	Yes. In recent times the EC chairpersons are vilified by either of two major parties because of perceived allegiance to the party that appointed them. Furthermore, there are news reports of parties using all kinds of illegal tactics to gain electoral advantage. These include: using “machomen” to intimidate real or perceived opponents from registering or voting; arranging for minors and foreigners to register and colluding with electoral officers.
Is the cost of registration considered too high by commentators or users?	Can users change the data stored by the system when desired?	Is the system adequately funded to support its maintenance (including any expansion plans)?	Does the system officially or unofficially share data with the state security services?
No. Registration is free.	Yes.	Yes.	This is possible. Because news reports show that the EC sold biometric data to a software company who in turn sold it to financial institutions.

Are there routinely unofficial bribes/. payments for registration?	Can users access records of how their data is used and what additional data the system may aggregate from elsewhere?	Does the system have a de-duplication process that draws on data from other systems?	Has any kind of public risk analysis been carried out for the system by the authorities in charge?
Yes. There are reports of registration officers taking bribes to replace cards.	No.	No.	The new EC leadership has been reviewing the electoral system. Recently the EC terminated a contract with a foreign IT firm that managed the elections data center since 2012. According to the EC the foreign firm was given unfettered access to the data centre and could shut down systems arbitrarily.
Are there complex registration processes that require literacy, digital literacy or a specific language?	Can users remove themselves from the system?	Have there been any cases of corruption during the establishment of the system or its use?	Was and is civil society consulted on the system's use?
No.	No.	During the 2016 elections in a televised briefing while results were being compiled, the EC chair reported that the EC system had been hacked.	No.
Does the registration process involve the collection of biometric data that some cannot easily provide?	If the ID enables access to multiple services, does it ensure users cannot be tracked via a single number or identifier across them?	Is money the system collects for registration, credentials or verification accounted for transparently?	Are any accountability mechanisms accessible to the public in place for the system?
Yes.	Not applicable.	Money is only collected for replacing cards.	There is an Inter-Party Advisory Committee (IPAC) that meet occasionally with the

			EC to discuss and agree on pertinent issues with the electoral process. The EC and the IPAC have worked together to introduce reforms in the electoral process.
Does the registration process force particular identities upon users?		Is it a 'one-shot' use system (e.g. an electoral roll) or can it be updated?	Is there an independent state authority that the system is accountable to?
No.	Can be updated.		No.
If the system is 'voluntary', will non subscription lock people out of particular vital state or non-state services?		Do the system's operators undergo standardised training?	
No.		Yes.	

SIM ID System Risks and Vulnerabilities

Exclusions	Privacy	Costs	Politics
Are there physical registration points within reach of poor, rural or peripheral communities? Or are there alternative methods?	Is the system managed by foreign vendors?	For National ID systems: Was the start-up cost above or below the \$3-6 per person benchmark for low-income countries? ³⁶	Was the system introduced through normal legislative channels?
Yes. Typically, people register with individual vendors in their communities if they cannot access the telco offices.	The project is overseen by the National Communication Authority but the telcos that implement it are largely foreign-owned. The telcos have access to the database.	N/A	Yes. There is the SIM Registration Regulations, 2011 which makes registration of SIM cards mandatory.
Are there records of difficulties in acquiring any feeder documents	Do commentators or users say the collected data is beyond that	For National ID systems: Is the annual maintenance cost	Does the system reveal trends or patterns that could be acted upon but

required for registration?’	required for the task?	above or below the benchmark of 0.1 of GDP or \$1.50 per person for low-income countries?³⁷	have not (e.g. tax avoiders, ghost staff or benefit payments, voting irregularities etc.)?
Not necessarily. But those without a nationally-issued ID cannot register for a SIM card.	Not regarding the SIM registration per se but the matter of excess data came up when the government sought to implement the common platform for traffic monitoring.	N/A	The sale of pre-registered SIM cards remains a challenge.
Does registration rely on social accreditation (e.g. community leaders vouching for the applicant/user)?	Does the system rely on a unique number that reveals personal information to lay people?	Is the system part of a locked-in (e.g. the state or company cannot exit the agreement) contract with a private vendor?	Are there any reports of political interference over the system?
To some extent. The NCA understands that those without ID cards could access SIM cards registered by their relative. Here, the one whose ID is used assumes liability.	Not necessarily.	No.	No.
Is the cost of registration considered too high by commentators or users?	Can users change the data stored by the system when desired?	Is the system adequately funded to support its maintenance (including any expansion plans)?	Does the system officially or unofficially share data with the state security services?
No, it is free.	No.	This is likely as the registration and database are maintained by the telcos.	Yes, but it must come with a court order.
Are there routinely unofficial bribes for registration?	Can users access records of how their data is used and what additional data the system may aggregate from elsewhere?	Does the system have a de-duplication process that draws on data from other systems?	Has any kind of public risk analysis been carried out for the system by the authorities in charge?

Yes, but not routine. Some individual vendors reportedly have charged people in order to register them in the beginning of the exercise.	No.	N/A	N/A
Are there complex registration processes that require literacy, digital literacy or a specific language?	Can users remove themselves from the system?	Have there been any cases of corruption during the establishment of the system or its use?	Was and is civil society consulted on the system's use?
No.	No.	Yes, there are reports of charging people for registration although it is supposed to be free.	Not necessarily but CSOs have made their voices heard on the challenges with the exercise.
Does the registration process involve the collection of biometric data that some cannot easily provide?	If the ID enables access to multiple services, does it ensure users cannot be tracked via a single number or identifier across them?	Is money the system collects for registration, credentials or verification accounted for transparently?	Are any accountability mechanisms accessible to the public in place for the system?
No.	If you use your phone number to register for services such as mobile money then your transactions can be tracked.	Not applicable.	No. Unless one wants to pursue a supposed infringement in court or via the Data Protection Commission.
Does the registration process force particular identities upon users?		Is it a 'one-shot' use system (e.g. an electoral roll) or can it be updated?	Is there an independent state authority that the system is accountable to?
No.		N/A	The telcos are accountable to the National Communication Authority.
If the system is 'voluntary', will non subscription lock		Do the system's operators undergo standardised training?	

people out of particular vital state or non-state services?			
Yes. Without a SIM card, partaking in the economy is difficult as many other registration exercises and transactions require a phone number.		Yes, for official employees of the telcos. Not necessarily for the private individual vendors.	

Birth Registration Risks and Vulnerabilities

Exclusions	Privacy	Costs	Politics
Are there physical registration points within reach of poor, rural or peripheral communities? Or are there alternative methods?	Is the system managed by foreign vendors?	For National ID systems: Was the start-up cost above or below the \$3-6 per person benchmark for low-income countries?³⁶	Was the system introduced through normal legislative channels?
BDR has 412 registration points with a staff strength of 212. To optimize its operation, BDR would need a minimum of one officer and two national service persons for each of the 275 districts in Ghana. There is recently, the introduction of the mBirth registration with the help of Tigo (a telco) to help register births in most of the rural communities with the help of some health professionals deployed to CHP areas.	No.	N/A	Yes, Registration of Births and Deaths Act, 1965 Act 301.
Are there records of difficulties in acquiring any feeder documents required for registration?	Do commentators or users say the collected data is beyond that required for the task?	For National ID systems: Is the annual maintenance cost above or below the benchmark of 0.1	Does the system reveal trends or patterns that could be acted upon but have not (e.g. tax avoiders, ghost staff

		of GDP or \$1.50 per person for low-income countries? ³⁷	or benefit payments, voting irregularities etc.)?
A few births take place in health facilities and those are normally associated with the urban population and these births are easier to have the feeder document to register. In the case of the rural population most of the birth deliveries are handled by traditional health attendants who cannot give any documentation for prospective registration. The only way they acquire the feeder document for registration is when they send such babies for ante-natal care/ Weigh-in.	No.	N/A	No.
Does registration rely on social accreditation (e.g. community leaders vouching for the applicant/user)?	Does the system rely on a unique number that reveals personal information to lay people?	Is the system part of a locked-in (e.g. the state or company cannot exit the agreement) contract with a private vendor?	Are there any reports of political interference over the system?
No.	No.	No.	No.
Is the cost of registration considered too high by commentators or users?	Can users change the data stored by the system when desired?	Is the system adequately funded to support its maintenance (including any expansion plans)?	Does the system officially or unofficially share data with the state security services?
No. It is basically free; there is a Ghc 50.00 fee charged for late registration (12 months or later after birth).	No.	No.	No.

Are there routinely unofficial brides for registration?	Can users access records of how their data is used and what additional data the system may aggregate from elsewhere?	Does the system have a de-duplication process that draws on data from other systems?	Has any kind of public risk analysis been carried out for the system by the authorities in charge?
Yes, there have been some complaints by some members of the public but none have been reported and proven to be true at any court of law.	No.	No.	No.
Are there complex registration processes that require literacy, digital literacy or a specific language?	Can users remove themselves from the system?	Have there been any cases of corruption during the establishment of the system or its use?	Was and is civil society consulted on the system's use?
No.	No.	No.	Yes
Does the registration process involve the collection of biometric data that some cannot easily provide?	If the ID enables access to multiple services, does it ensure users cannot be tracked via a single number or identifier across them?	Is money the system collects for registration, credentials or verification accounted for transparently?	Are any accountability mechanisms accessible to the public in place for the system?
No.	Yes.	The money paid for late birth registrations are lodged into the consolidated account of the State, making it highly difficult to know much and what it is used for.	No.
Does the registration process force particular identities upon users?		Is it a 'one-shot' use system (e.g. an electoral roll) or can it be updated?	Is there an independent state authority that the system is accountable to?
No.		Once a birth is registered it becomes highly difficult to updated .	No.

If the system is ‘voluntary’, will non subscription lock people out of particular vital state or non-state services?		Do the system’s operators undergo standardized training?	
Yes. The registration provides an individual with the birth certificate that serves as a breeder document for all the functional ID systems.		Seldom.	

National Health Insurance ID Risks and Vulnerabilities

Exclusions	Privacy	Costs	Politics
Are there physical registration points within reach of poor, rural or peripheral communities? Or are there alternative methods?	Is the system managed by foreign vendors?	For National ID systems: Was the start-up cost above or below the \$3-6 per person benchmark for low-income countries?³⁶	Was the system introduced through normal legislative channels?
The NHIS has 166 district offices across the country by which applicants can be assisted to register. However, there are indications that some communities have challenges reaching the district offices because of the distance and challenges with transportation.	Partly managed by foreign vendor.	N/A	Yes.
Are there records of difficulties in acquiring any feeder documents required for registration?’	Do commentators or users say the collected data is beyond that required for the task?	For National ID systems: Is the annual maintenance cost above or below the benchmark of 0.1 of GDP or \$1.50 per person for low-income countries?³⁷	Does the system reveal trends or patterns that could be acted upon but have not (e.g. tax avoiders, ghost staff or benefit payments, voting irregularities etc.)?

The NHIS does not insist on feeder documents.	No such commentary is available.	N/A	Issues of identity and claims fraud have been acknowledged as among the major factors that are threatening the viability of the NHIS. The NHIA has taken steps to address these issues using biometric systems. However, issues of excluding some diseases and medication under the scheme remain.
Does registration rely on social accreditation (e.g. community leaders vouching for the applicant/user)?	Does the system rely on a unique number that reveals personal information to lay people?	Is the system part of a locked-in (e.g. the state or company cannot exit the agreement) contract with a private vendor?	Are there any reports of political interference over the system?
No.	No.	No.	The CEO, Chairman and two other members are appointed by the President of Ghana. The NHIS has been one of the areas used by the two major political parties in campaign promises.
Is the cost of registration considered too high by commentators or users?	Can users change the data stored by the system when desired?	Is the system adequately funded to support its maintenance (including any expansion plans)?	Does the system officially or unofficially share data with the state security services?
The NHIS has exemptions for certain categories of people in the payment of premiums and processing fees. However, there are indications that some people find the cost high especially since the card has to be renewed annually.	Yes.	The NHIS is struggling to pay the increasing debt owed the service providers. There are many reports of health care providers not accepting the NHIS card because of delays in receiving payments for services provided.	Evidence is not available.

Are there routinely unofficial brides for registration?	Can users access records of how their data is used and what additional data the system may aggregate from elsewhere?	Does the system have a de-duplication process that draws on data from other systems?	Has any kind of public risk analysis been carried out for the system by the authorities in charge?
Evidence is not available.	No.	No.	Yes. The NHIS is continually being reviewed.
Are there complex registration processes that require literacy, digital literacy or a specific language?	Can users remove themselves from the system?	Have there been any cases of corruption during the establishment of the system or its use?	Was and is civil society consulted on the system's use?
No.	No.	Yes. Especially fraudulent claims by health providers.	By law, civil society groups are not consulted but they do influence the system by their advocacy and research activities.
Does the registration process involve the collection of biometric data that some cannot easily provide?	If the ID enables access to multiple services, does it ensure users cannot be tracked via a single number or identifier across them?	Is money the system collects for registration, credentials or verification accounted for transparently?	Are any accountability mechanisms accessible to the public in place for the system?
Yes.	Currently there is no evidence that the system tracks users across multiple services. However, there are indications that the national and sector IDs will be harmonised.	Receipts are issued for moneys collected during registration.	Like all government programmes, the NHIS is accountable to the Ghana Health Service and Parliament through the MoH. As well as the Auditor-General who occasionally audits such government agencies.
Does the registration process force particular identities upon users?		Is it a 'one-shot' use system (e.g. an electoral roll) or can it be updated?	Is there an independent state authority that the system is accountable to?

No.		Can be updated.	No.
If the system is ‘voluntary’, will non subscription lock people out of particular vital state or non-state services?		Do the system’s operators undergo standardised training?	
By law, the NHIS is voluntary but many people are not members. Currently about 60% of Ghanaians are without the card and so pay out of pocket.		Yes.	

Driver and Vehicle Licensing ID System Risks and Vulnerabilities

Exclusions	Privacy	Costs	Politics
Are there physical registration points within reach of poor, rural or peripheral communities? Or are there alternative methods?	Is the system managed by foreign vendors?	For National ID systems: Was the start-up cost above or below the \$3-6 per person benchmark for low-income countries?³⁶	Was the system introduced through normal legislative channels?
Yes, one must be physically present at a DVLA office. However, they are mostly situated in urban areas. There is also an opportunity for applicants to begin the registration with an online application.	No.	N/A	Yes, Act 569 (1999).
Are there records of difficulties in acquiring any feeder documents required for registration?’	Do commentators or users say the collected data is beyond that required for the task?	For National ID systems: Is the annual maintenance cost above or below the benchmark of 0.1 of GDP or \$1.50 per person for low-income countries?³⁷	Does the system reveal trends or patterns that could be acted upon but have not (e.g. tax avoiders, ghost staff or benefit payments, voting irregularities etc.)?

No.	No.	N/A	N/A
Does registration rely on social accreditation (e.g. community leaders vouching for the applicant/user)?	Does the system rely on a unique number that reveals personal information to lay people?	Is the system part of a locked-in (e.g. the state or company cannot exit the agreement) contract with a private vendor?	Are there any reports of political interference over the system?
No.	No.	N/A	No.
Is the cost of registration considered too high by commentators or users?	Can users change the data stored by the system when desired?	Is the system adequately funded to support its maintenance (including any expansion plans)?	Does the system officially or unofficially share data with the state security services?
Not necessarily.	No.	The DVLA has weaned itself of state subventions.	The DVLA works with the Ghana Police via the MTTU during investigations.
Are there routinely unofficial bribes for registration?	Can users access records of how their data is used and what additional data the system may aggregate from elsewhere?	Does the system have a de-duplication process that draws on data from other systems?	Has any kind of public risk analysis been carried out for the system by the authorities in charge?
There has been the constant issue of 'goro boys' who charge people a lot more to facilitate their registration.	No.	N/A	N/A
Are there complex registration processes that require literacy, digital literacy or a specific language?	Can users remove themselves from the system?	Have there been any cases of corruption during the establishment of the system or its use?	Was and is civil society consulted on the system's use?
According to DVLA, applicants must be literate.	No.	There has been the perception that staff at the DVLA have exploited clients in their bid to register.	While it is unclear whether CSOs have been consulted or not, CSOs have raised concerns about the DVLA in the past.

Does the registration process involve the collection of biometric data that some cannot easily provide?	If the ID enables access to multiple services, does it ensure users cannot be tracked via a single number or identifier across them?	Is money the system collects for registration, credentials or verification accounted for transparently?	Are any accountability mechanisms accessible to the public in place for the system?
The new smart cards are biometrics-based.	No.	Registrants are issued a receipt. Beyond that, it is the Auditor General's report that could reveal any misappropriation of funds.	The DVLA accounts to the Ministry of Transport, the Auditor General and Parliament. The Auditor General's report may reveal some of the excesses at the DVLA.
Does the registration process force particular identities upon users?		Is it a 'one-shot' use system (e.g. an electoral roll) or can it be updated?	Is there an independent state authority that the system is accountable to?
No		N/A	In terms of finances, it is the Auditor General. In terms of data rights, the Data Protection Commission could step in.
If the system is 'voluntary', will non subscription lock people out of particular vital state or non-state services?		Do the system's operators undergo standardised training?	
No. It only restricts one from driving.		Yes.	

Passport System Risks and Vulnerabilities

Exclusions	Privacy	Costs	Politics
Are there physical registration points within reach of poor, rural or peripheral communities? Or are there alternative methods?	Is the system managed by foreign vendors?	For National ID systems: Was the start-up cost above or below the \$3-6 per person benchmark for low-income countries?³⁶	Was the system introduced through normal legislative channels?
The process usually takes place at physical locations that are mostly situated in urban communities. Part of the process can now be initiated online.	No, the Ministry of Foreign Affairs is in charge although Innovatrics (a foreign company provides some software support).	N/A	Yes, via the Passport and Travel Certificate Decree (NLC 155, 1967).
Are there records of difficulties in acquiring any feeder documents required for registration?’	Do commentators or users say the collected data is beyond that required for the task?	For National ID systems: Is the annual maintenance cost above or below the benchmark of 0.1 of GDP or \$1.50 per person for low-income countries?³⁷	Does the system reveal trends or patterns that could be acted upon but have not (e.g. tax avoiders, ghost staff or benefit payments, voting irregularities etc.)?
Yes, having a birth certificate is crucial to getting a passport. Many Ghanaians do not have birth certificates.	No.	N/A	The use of fake birth certificates has been a longstanding challenge.
Does registration rely on social accreditation (e.g. community leaders vouching for the applicant/user)?	Does the system rely on a unique number that reveals personal information to lay people?	Is the system part of a locked-in (e.g. the state or company cannot exit the agreement) contract with a private vendor?	Are there any reports of political interference over the system?
No	Yes it relies on a unique number but the number could be of little utility to lay people.	N/A	No.

Is the cost of registration considered too high by commentators or users?	Can users change the data stored by the system when desired?	Is the system adequately funded to support its maintenance (including any expansion plans)?	Does the system officially or unofficially share data with the state security services?
No. 50 Cedis for standard and 100 Cedis for express processing.	You can always apply for a new passport and support changes with evidence.	So far there has not been major issues with funding.	Yes, the Immigration Service works with passport data.
Are there routinely unofficial bribes for registration?	Can users access records of how their data is used and what additional data the system may aggregate from elsewhere?	Does the system have a de-duplication process that draws on data from other systems?	Has any kind of public risk analysis been carried out for the system by the authorities in charge?
Yes, the menace of middlemen/ goro boys has been a longstanding challenge.	Not necessarily.	N/A	N/A
Are there complex registration processes that require literacy, digital literacy or a specific language?	Can users remove themselves from the system?	Have there been any cases of corruption during the establishment of the system or its use?	Was and is civil society consulted on the system's use?
The passport form is only in English.	No.	The corruption mostly has to do with how staff of the passport office exploit people who want passports.	N/A
Does the registration process involve the collection of biometric data that some cannot easily provide?	If the ID enables access to multiple services, does it ensure users cannot be tracked via a single number or identifier across them?	Is money the system collects for registration, credentials or verification accounted for transparently?	Are any accountability mechanisms accessible to the public in place for the system?
Yes, fingerprint biometrics are required.	N/A	Those who buy forms get receipts. Beyond that, it is the Auditor General's report that can expose the	Financially, the Auditor General's report could provide such insight. In terms of Data rights, the Data Protection

		misappropriation if any within the Passport Office.	Commission and the law courts may be an option.
Does the registration process force particular identities upon users?		Is it a ‘one-shot’ use system (e.g. an electoral roll) or can it be updated?	Is there an independent state authority that the system is accountable to?
No.		It can be updated.	In terms of data protection, it has to be the Data Protection Commission.
If the system is ‘voluntary’, will non-subscription lock people out of particular vital state or non-state services?		Do the system’s operators undergo standardised training?	
Not necessarily but you can hardly travel outside the country.		Yes.	

Annex 2 – Focus Group Discussions Methodology

ID ownership

- What are the different ID documents you have?
- Of all these documents, what is the first document you remember keeping with you? In addition, why this one?
- Do you have any memory you can share about getting that first ID document?
- Which of these documents you have mentioned is the most important to you?
- In addition, why? Which services do you access through it?
- Which of these documents do you use the most?
- How do you use it? Please share.

Specifically about National ID

- If not already mentioned, do you have a national ID?
- When did you obtain it? Did you obtain by yourself or did someone help you?
- Was it an easy process?
- Why is the national ID important to you? When do you use it? Please share.

Voter ID

- If not already mentioned, do you have a national ID?
- When did you obtain it? Did you obtain by yourself or did someone help you?
- Was it an easy process?
- Why is the national ID important to you? When do you use it? Please share.

Driver's Licence

- If not already mentioned, do you have a national ID?
- When did you obtain it? Did you obtain by yourself or did someone help you?
- Was it an easy process?

- Why is the national ID important to you? When do you use it? Please share.

Passport

- If not already mentioned, do you have a national ID?
- When did you obtain it? Did you obtain by yourself or did someone help you?
- Was it an easy process?
- Why is the national ID important to you? When do you use it? Please share.

National Health Insurance Card

- If not already mentioned, do you have a national ID?
- When did you obtain it? Did you obtain by yourself or did someone help you?
- Was it an easy process?
- Why is the national ID important to you? When do you use it? Please share.

Specifically about the Birth Certificate

- If not already mentioned, do you have a Birth Certificate?
- When did you obtain it? Did you obtain by yourself or did someone help you?
- Was it an easy process?
- Why is the Birth Certificate important to you? When do you use it? Please share.

Specifically about Sim Card

- If not already mentioned, do you have a SIM card?
- Is it under your name? Is it under someone else's name? If so, who's?
- Do you have a mobile money(MM) account? How do you use it/what type of transactions do you use your MM account for?

- Do you have any savings account on your mobile? How is it helpful?
- Was it easy to obtain a mobile money bank account?
- How long have you had it for?
- Why is it important to you?
- Do you think it is important for women to have a mobile money account? Why?
- What do you like the most about it?
- How often do you use it? Please share your experience.

ID exclusion

- Do you have any experience of challenges in obtaining an ID? In addition, if not you, do you have any friends who did?
- What were the challenges? (Probe: dealing with government, Logistics of going to office to apply, costs.)
- Do you think there are specific challenges for women? Why?
- Do you have any examples that make you think that it is harder for women than for men to access ID documents? Please share.
- What do you think are the risks/limitations of not having an ID? In particular for women?
- Do you have experience of not having an ID and facing problems without it? Alternatively, a friend? Alternatively, your child?

Specifically about the National ID

- Probe on the risks of not having a national ID. Specifically for women.
- Are there services you cannot access without the national ID?
- If applicable to respondent: Why don't you have a national ID

Specifically about the Voter ID

- Probe on the risks of not having a Voter ID. Specifically for women.
- Are there services you cannot access without the Voter ID?
- If applicable to respondent: Why don't you have a Voter ID?

Specifically about the Driver Licence

- Probe on the risks of not having a Driver Licence . Specifically for women.
- Are there services you cannot access without the Driver's Licence?
- If applicable to respondent: Why don't you have a Driver's Licence?

Specifically about the Passport

- Probe on the risks of not having a passport. Specifically for women.
- Are there services you cannot access without the passport?
- If applicable to respondent: Why don't you have a passport?

Specifically about the National Health Insurance Card

- Probe on the risks of not having a National Health Insurance Card. Specifically for women.
- Are there services you cannot access without the National Health Insurance Card?
- If applicable to respondent: Why don't you have a National Health Insurance Card?

Specifically about the Birth Certificate

- Probe on the risks of not having a Birth Certificate. Specifically for women.
- Are there services you cannot access without the Birth Certificate?
- If applicable to respondent: Why don't you have a Birth Certificate?

Specifically about Sim Card

- What are the limitations that you face without an mobile money account? Specifically for women?
- If applicable to respondent: Why don't you have a Mobile Money account?
- Do you have access to internet?
- Do you have your own mobile SIM (if not answered before)?
- Do you need help in browsing the internet? Or accessing mobile money?

- Are you allowed to browse the internet or to do transactions on Mobile Money by yourself?

Privacy

- For those who have social media, what do you use it for? Do any of you use social media to buy items, clothes or other?
- Do you ever worry about the information you put on your Facebook or WhatsApp? Or other? If so, why?
- How would you feel if the information on Facebook was used for identification purposes? For example: the “about you” section was recorded for your ID registration? Or if your bank started knowing about the transactions, you do on your WhatsApp?
- Do you ever ask yourself why the government needs your data?
- Do you think there are any risks with giving your information to the government? Why?
- Do you think women in particular are at risk when giving their information? Why?
- Are they more at risk when giving information to the government or on their social media? Is it the same? Why?
- Have you ever made a complaint about an ID issuer - either state or private? How did you go about it and what was the outcome?
- Do you have any concerns about the data collected about your child/yourself when applying for ID documents?
- Would you feel more comfortable sharing your information if it was used for the national ID system or for the Hospital card?
 - Is it the same? Why/why not?
- Would you feel more comfortable sharing your information if it was used for the government or for social media - like Facebook?
 - Is it the same? Why/why not?

Specifically about Sim Card

- Do you know how MTN/ VODAFONE/ AIRTEL TIGO decides whether to give you a loan or not?

- Please share your story.

Specifically about National ID

- Considering that there are already diverse forms of national ID documents such as the passport, birth certificate, national health insurance card, driver’s licence, voter ID, etc, do you think there is the need for the National ID? Why?

Politics (gender)

Some of the ownership and exclusion questions will give insights into the gender differences - these are broader gender norms questions to understand if some ID systems are more prejudiced against female than male users.

Access

- Overall, do you think it is easier for men to access ID documents? If so, why?
- Are the registration officers for ID documents usually men? Why?
- Are there specific ID documents you think are easier for men to access? Which ones and why?

Specifically, we spoke about the national ID, Birth Certificate, Driver’s Licence, Passport, Health Insurance ID, Voter ID, and Sim Card. Are any of these documents easier to access for men?

- Do you think certain ID documents we discussed are easier to use for men rather than women?

Have you ever had issues accessing a service, even if you had the relevant ID document? Why do you think that happens?

- Have you - or a friend - ever felt discriminated against when wanting to access a service, compared to men: for instance, protocol treatment for certain categories of people?

Consent forms are available on request.

Ghana's Identity Ecosystem

