Documenting the Accountability Footsteps of Ghana’s Covid-19 National Trust Fund
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This article is based on reports from the COVID-19 National Trust Fund obtained by the Ghana Anti-Corruption Coalition (GACC) from two platforms. On March 1, 2022, the GACC offered the Trust Fund its Accountability Forum at the AITI Kofi Annan Centre of Excellence to brief Ghanaians on its receipt and usage of COVID-19 funds. The Accountability Forum was organized as part of the GACC’s “COVID-19 Accountability Bridges: Providing Platforms for Engaging Government on Transparent and Accountable COVID-19 Expenditure” project, funded by the US Embassy. The GACC followed up on the presentation made by the COVID-19 National Trust Fund with an interview with the Fund Administrator; Dr. William Collins Asare, on 20th June 2022 to delve more into the reports and draw some conclusions for the Ghanaian public. This special report has largely been influenced by the information on the Fund shared by the Trust Fund over these.

Considering the paucity of detailed information on the expenditure of COVID funds, the GACC believes this special report will provide some clarity and perhaps provide a basis to exact accountability from other entities that disbursed or facilitated disbursement of funds meant for COVID-19 activities.

2.0 Background – COVID-19 National Trust Fund

Ghana recorded its first case of COVID-19 on 12th March 2020. The Government responded by putting in place measures to help contain the spread of the virus and limit its impact on lives, livelihoods, and businesses. The COVID-19 National Trust Fund was therefore set up on 27th March 2020 under the COVID-19 National Trust Fund Act, 2020 (Act 1013). It provides a legal and accountability framework to support the mobilization and utilization of funds from public and private sources in the fight against the COVID-19 pandemic. In this regard, it is mandated to receive and manage contributions and donations from individuals, groups, and corporate bodies to assist in the welfare of needy and vulnerable persons infected with or affected by the COVID-19 pandemic and to support persons engaged in the combat of the pandemic in Ghana.

The structural composition of the COVID-19 National Trust Fund has 3 tiers: the Minister designated to oversee the Fund, the Board of Trustees and the Secretariat. The Minister is given a Fund management supervisory role. The Minister in charge of the Fund is a Minister at the Presidency. At the beginning of the Fund's set up, this was Dr. Kwaku Afriyie. He was subsequently succeeded by Hon. Freda Prempeh.1

3.0 Board of Trustees

The COVID-19 National Trust Fund is governed by a Chairperson and six (6) other persons (Trustees). They are responsible for the management of the Fund, in line with section 7 (1) of its establishment instrument, Act 1013. The membership of the Board comprises:

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1 Addo, M-A (official communication, February 28, 2022)
I. Her Ladyship Justice Sophia A.B. Akuffo (rtd), Chairperson
II. Most Rev. Justice Ofei Akrofi (Member),
III. Hon. Mrs. Gifty Affenyi Dadzie (Member),
IV. Mr. Jude Kofi Bucknor (Member),
V. Mrs. Elsie Addo Awadzi (Member),
VI. Dr. Ernest Ofori Sarpong (Member); and
VII. Dr. Abdul-Samed Tanko (Member),

Dr. William Collins Asare, the Fund Administrator, serves as Secretary to the Board.²

4.0 Administrative Set-Up of the Trust Fund

The day-to-day activities of the Trust Fund are carried out by a Secretariat, headed by the Administrator, Dr. William Collins Asare—a former diplomat with an extensive CV that spans several United Nations assignments. The staff includes an Internal Auditor and staff from the Controller and Accountant-General’s Department. There appears to be a very conscious effort to include control structures in the administration. Other roles include a Chief Operations Officer, Procurement & Supply Chain Manager, Research and Donations Officer, a Communications Officer/Spokesperson and Information & Technology Officer.³

According to Dr. Asare, the Trust Fund has been very deliberate in keeping administrative expenses to the minimum to avail the quantum of funds received to the work entrusted to the Fund by His Excellency, the President of Ghana, Nana Addo Dankwa Akufo-Addo. The Trust Fund has resolved to spend no more than 10% of its funds on administrative expenses, as mandated by Act 1013. Its actual expenditure on administration relative to the total sum received has hovered between 4%-6%. Out of the 16 staff of the Trust Fund, only 4 of them have their salaries being paid by the Fund. The rest of the staff are on posting and secondment from other public institutions, including the Office of the Head of Civil Service (OHCS) and Office of the President.⁴

²Addo, M-A (official communication, February 28, 2022)
³Addo, M-A (official communication, July 28, 2022)
⁴Asare, W.C. (2022, June 20). Personal Communication (Personal Interview)
5.0 Fund Purse and Disbursements

As of 30th June 2022, the Trust Fund had received a total of GH₵73 million in cash and donations. The cash component is GH₵62,329,941.98 while the remainder is the value of goods and non-cash items donated to the Trust Fund. The bulk of the funds were received between April and July 2020 during the peak period of the pandemic. This amounts to GH₵56.6 million in cash and GH₵10.7 million worth of items. The donations in both cash and kind have petered out since that period. Only a total of GH₵9,184,511.09 was received between 1st August 2020 and 30th June 2022.

Guided by its Donations and Receipts Policy, the Trust Fund as of 30th June 2022 had disbursed a total of GH₵53,230,805.37 for programmes, administrative purposes and procurement of items needed to contain the pandemic. The major areas of disbursements by the National Trust Fund are as follows:

Total cash amount received: GH₵62,329,941.98, as of 30th June 2022

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5. Adde, M-A (official communication, July 28, 2022)
## Table 1: COVID-19 National Trust Fund Disbursements

<table>
<thead>
<tr>
<th>No.</th>
<th>BENEFICIARY INSTITUTION</th>
<th>AMOUNT (GHC)</th>
<th>PURPOSE</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>GHANA COVID-19 PRIVATE SECTOR FUND</td>
<td>10,257,360.00</td>
<td>Procurement of medical equipment and PPE on behalf of the Trust Fund for distribution to Ghana Health Service, i.e. 56 Regional /Municipal /District hospitals, COVID-19 Care Management Centres and other health facilities throughout Ghana.</td>
</tr>
<tr>
<td>2</td>
<td>NATIONAL COMMISSION FOR CIVIC EDUCATION (NCCE)</td>
<td>2,500,000.00</td>
<td>Procurement of vehicles and other logistics for conducting sensitization campaign on COVID-19 pandemic.</td>
</tr>
<tr>
<td>3</td>
<td>INSTITUTE OF STATISTICAL SOCIAL &amp; ECONOMIC RESEARCH (ISSER)</td>
<td>344,200.00</td>
<td>Nation-wide survey to identify extremely vulnerable households to be provided with funding support by the Trust Fund.</td>
</tr>
<tr>
<td>4</td>
<td>MOFA/ VETERINARY SERVICES DIRECTORATE</td>
<td>1,984,200.00</td>
<td>Purchase of reagents and other laboratory supplies for testing COVID-19.</td>
</tr>
<tr>
<td>5</td>
<td>GHANA COVID-19 PRIVATE SECTOR FUND (INFECTIOUS DISEASE CENTRE)</td>
<td>6,801,840.00</td>
<td>Support for the completion of the 100-bed National Infectious Diseases Centre at the Ga East Municipal Hospital</td>
</tr>
<tr>
<td>6</td>
<td>PANTANG HOSPITAL- (ISOLATION CENTRE)</td>
<td>806,600.00</td>
<td>Rehabilitation and equipping of hospital’s Isolation Centre</td>
</tr>
<tr>
<td>7</td>
<td>RE-OPENING OF TERTIARY INSTITUTIONS (PPE)</td>
<td>7,695,404.00</td>
<td>Purchase of PPE for students at the reopening of Tertiary Institutions across the country.</td>
</tr>
<tr>
<td>8</td>
<td>GHANA HEALTH SERVICE &amp; NOGUCHI MEMORIAL INSTITUTTE FOR MEDICAL RESEARCH</td>
<td>5,658,298.70</td>
<td>Purchase of reagents and other laboratory supplies for testing of COVID-19.</td>
</tr>
<tr>
<td>9</td>
<td>JUDICIAL SERVICE</td>
<td>815,400.00</td>
<td>Procurement of PPE for its courts and offices across the country.</td>
</tr>
</tbody>
</table>
| 10  | PROCUREMENT AND SEWING OF PPE FOR DISTRIBUTION                                          | 2,461,956.00   | a. Purchase of GH¢2,041,000.00 worth of PPE for general distribution  
   b. Procurement of textiles and its sewing into nose masks (GH¢420,956.00)                                                                                                                                                                                                                                                    |
| 11  | REGIONAL COORDINATING COUNCIL - BONO REGION                                            | 210,030.00     | Mandatory quarantine and subsequent transportation of 42 Ghanaian deportees from Cote d’Ivoire                                                                                                                                                                                                                                      |
| 12  | GHANA ATOMIC ENERGY COMMISSION                                                          | 47,718.00      | Construction of Holding Unit to upscale the gamma irradiation facility to fully manage the processing and sterilization of PPE.                                                                                                                                                                                                          |
| 13  | NATIONAL COMMISSION ON CULTURE - 1ST PHASE OF NATIONWIDE SENITIZATION                   | 646,400.00     | Public education and sensitization on COVID-19 pandemic.                                                                                                                                                                                                                                                                               |
| 14  | NATIONAL COMMISSION ON CULTURE - 2ND PHASE OF NATIONWIDE SENITIZATION                   | 525,250.00     | Public education and sensitization on COVID-19 pandemic.                                                                                                                                                                                                                                                                               |
| 15  | INGENIUS AFRICA LTD                                                                    | 421,500.00     | Production and broadcast of “Corona Life”, an educative programme on the COVID-19 pandemic                                                                                                                                                                                                                                            |
| 16  | HEALTHCARE FEDERATION GHANA / MEDLAB SERVICES GHANA LIMITED                             | 114,200.00     | Development of COVID-19 Laboratory Information System (LIS) at Noguchi for the public testing laboratories in Ghana                                                                                                                                                                                                                   |
| 17  | ARB APEX BANK (SOCIAL INTERVENTION PROGRAMME)                                          | 3,964,500.00   | Disbursement of funds for 7,927 poor and vulnerable persons affected by COVID-19 pandemic. Beneficiaries identified by ISSER, University of Ghana. (Point 3 above)                                                                                                                                 |
| 18  | GHANA POLICE SERVICE                                                                   | 1,000,000.00   | Procurement of PPE for 11 Police clinics across the regional capitals.                                                                                                                                                                                                                                                                |
| 19  | KUMASI CENTRE FOR COLLABORATIVE RESEARCH (KCCR)                                        | 624,656.12     | Research into the prevalence and nature of the COVID-19 virus in the country.                                                                                                                                                                                                                                                       |
| 20  | EBEYE YIE FOUNDATION                                                                   | 227,104.00     | Conduct of training programme to educate hearing impaired persons about COVID-19 preventions and safety protocols and COVID-19 vaccination.                                                                                                                                                                                                 |

(Points 3 and above refer to the disbursement points mentioned in the table.)
Source: COVID-19 National Trust Fund

Section 5 of the Novel Coronavirus (COVID-19) National Trust Fund Act, 2020 (Act 1013) on application of moneys and resources of the Fund provides specific areas to which the funds can be spent, as follows:

I. Support persons engaged in the combat of the COVID-19 pandemic;
   ii. Support needy and vulnerable persons infected with or affected by the COVID-19 pandemic;
   and
   iii. Any other matter necessary to achieve the objects of the Fund.

The above provision in the law is broad enough to cover the range of areas of expenditure that the Trust Fund has undertaken. The thematic areas of expenditure by the Fund within the period under review are illustrated in the diagram below:

<table>
<thead>
<tr>
<th>No.</th>
<th>Organization</th>
<th>Amount</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>21</td>
<td>Greater Accra Regional Hospital (Ridge Hospital)</td>
<td>314,032.62</td>
<td>Laying of pipeline to connect the hospital’s oxygen plant to its COVID-19 Intensive Care Unit and Holding Bay.</td>
</tr>
<tr>
<td>22</td>
<td>National Union of Ghana Students (NUGS)</td>
<td>40,000.00</td>
<td>Support for organization of National Leadership training on post COVID-19 and development of global competitive youth.</td>
</tr>
<tr>
<td>23</td>
<td>Noguchi Memorial Institute for Medical Research</td>
<td>49,500.00</td>
<td>Cost of publicity for first of the Institute’s series of Symposia on COVID-19 in Ghana.</td>
</tr>
<tr>
<td>24</td>
<td>Ghana Health Service</td>
<td>458,835.00</td>
<td>Airing of documentaries to promote uptake of COVID-19 vaccination.</td>
</tr>
<tr>
<td>25</td>
<td>National Road Safety Authority</td>
<td>532,700.00</td>
<td>‘Stay Alive’ Road safety campaign and promotion for uptake of COVID-19 vaccination.</td>
</tr>
<tr>
<td>26</td>
<td>Centre for Plant Medicine Research, Mampong-Akuapem</td>
<td>1,800,037.00</td>
<td>Support research and development of herbal alternatives for the treatment of coronavirus.</td>
</tr>
<tr>
<td>27</td>
<td>Noguchi Memorial Institute for Medical Research</td>
<td>2,272,762.80</td>
<td>Undertake COVID-19 vaccine research to establish durability of immune responses elicited by three different vaccines (AstraZeneca, Pfizer and BioNTech) within the Ghanaian population.</td>
</tr>
</tbody>
</table>

**TOTAL** | **52,574,484.24** |
Figure 2: Thematic Distribution of Trust Fund Disbursements

From the above diagram, the most significant expenditure of 42% was spent on Personal Protective Equipment, and this translates to GH¢22.2 million. This spending is consistent with the first thematic area of application provided for under section 5 of the establishment law to support persons engaged in the combat of the COVID-19 pandemic.

After PPE, investment in COVID infrastructure is the next most important expenditure undertaken by the Fund. The Trust Fund spent GH¢8 million on infrastructure support, representing 15% of the total funds. Such infrastructure includes the Infectious Diseases Centre at the Ga East Municipal Hospital, the Isolation Centre (rehabilitation and equipping) at Pantang Hospital, the Holding Unit to equip the gamma irradiation facility at the Ghana Atomic Energy Commission (GAEC), laying of pipelines to extend oxygen connection from the oxygen plant to the COVID-19 Intensive Care Unit and Holding Centre at the Greater Accra Regional Hospital, and the development of a COVID-19 Laboratory Information System (LIS) at Noguchi.

The next significant area of expenditure was on Medical Supplies particularly the purchase of reagents and other laboratory supplies for testing of COVID-19. This amounted to GH¢7.6 million, representing 15% of the total amount spent.

In situations such as a pandemic, the advice is to focus a lot more on prevention. The Trust Fund spent GH¢5.4 million (10%) on sensitization, education, and training efforts. These included a disbursement of GH¢227,104.00 to Ebeye Yie Foundation, a Civil Society Organization. The Foundation was supported to conduct training programmes in three (3) worst affected Regions (Greater Accra, Ashanti and Central) to educate hearing impaired persons about COVID-19 prevention and safety protocols and COVID-19 vaccination. The objective here is to get citizens to understand the nature of the virus and comply with the prevention protocols that are instituted to keep infection rates low.
The National Trust Fund has invested a similar proportion of the funds, GH₵4.3 million (8%), in social interventions. Out of this, an amount of GH₵3.9 million was used to support 7,927 poor and vulnerable persons affected by the COVID-19 pandemic while the remaining figure of GH₵344,200.00 was transferred to the Institute of Statistical, Social and Economic Research (ISSER) of the University of Ghana. The ISSER undertook a survey across the country to help identify beneficiaries. The amount paid to these beneficiaries was GH₵500.00 per person or household. Even though the amount was intended for subsistence, not unlike programmes such as the Livelihood Empowerment Against Poverty (LEAP), it has been reported by the Trust Fund's monitoring and evaluation team that some beneficiaries had invested the money into economic activities such as animal rearing. The disbursement of the funds was undertaken by the ARB Apex Bank on behalf of the Fund, reportedly selected for its reach into rural areas through its network of Rural and Community Banks, given the location of the identified beneficiaries and the rural expertise of the Bank. The Bank charged a 2% commission for disbursing the funds.

The Trust Fund has donated a total amount of GH₵4.6 million (9%) towards COVID-19 research activities. The Kumasi Centre for Collaborative Research (KCCR) has undertaken research into the prevalence and nature of the COVID-19 virus in Ghana. The Centre for Plant Medicine Research, Mampong-Akuapem is being supported to develop herbal alternatives for the treatment of coronavirus. In August 2022, the Trust Fund provided GH₵2.2 million to the Noguchi Memorial Institute for Medical Research. This will enable the Institute to undertake COVID-19 vaccine research to establish the durability of immune responses elicited by three different vaccines. Considering the investment made into research, the Trust Fund needs to demonstrate accountability by publishing the results of the research undertaken by the KCCR and Centre for Plant Medicine Research when they are completed.

The lowest investment in terms of quantum was quarantine costs by the Bono Regional Coordinating Council. The Bono Regional Coordinating Council received an amount of GH₵210,030.00 to quarantine and subsequently provide transportation within Ghana to 42 Ghanaian deportees from Cote d'Ivoire.

6.0 Accountability Footprints

A review of the above presents key accountability issues worthy of consideration by this paper.

6.1 Control Structures

While the laws of Ghana generally and Act 1013 specifically make provisions for control structures within the operations of the COVID-19 National Trust Fund, the enthusiasm with which the Fund's Board and Secretariat facilitated the establishment of key control structures such as Internal Audit Unit (IAU) manned by an Officer seconded from the Internal Audit Agency (IAA) and the Finance Office manned by two Officers from the Controller and Accountant General's Department in the early days of the Fund's operations is highly commendable. The Board also proceeded to establish its Audit Committee inaugurated in accordance with Section 86 of the Public Financial Management Act 2016 (Act 921). It is reported that the Board insisted on compliance with all required controls in line with the Public Financial Management laws of Ghana as far as their operations are concerned.
Article 187 (2) of Ghana’s Constitution mandates all institutions receiving public funds to be audited by the Auditor General at the end of the financial year. The COVID-19 National Trust Fund has therefore been audited by the Auditor-General. This financial audit was repeatedly requested for by the Fund itself; asking the Auditor-General to come in and look at their books. The audit findings are contained in the Report of the Auditor-General on the Public Accounts of Ghana: for the Period Ending 31 December, 2021 published on 29th August, 2022.

The point being made here is that while some institutions tend to ostracize internal control structures, the Fund was insistent on their inclusion and embraced their set up within the administration. One gets the impression that the Board and staff of the Fund are anxious to avoid being associated with any citations of mismanagement and corruption; an attitude that should be commended. However, it is not only attitude that helps avoid the scandals, but actual actions and inactions. Only time and audits (both financial and performance audit) could vindicate the women and men charged with overseeing the COVID-19 National Trust Fund.

6.2 Focus on Public Institutions

The Trust Fund has a skeleton administration staff that was not set up for actual implementation of COVID-19 activities. They would have to rely on implementation institutions with expertise in their respective fields. Their choice of public institutions as conduits for implementation ought to be commended. According to the Fund, this was a conscious decision meant to provide capacity for public institutions and ensure their urgency in COVID-19 activities. As welfarist institutions, they (public institutions) are more likely to spend every pesewa on actual operations rather than the retention of profit. Indeed, out of the 27 institutions that the Trust Fund disbursed money to, twenty-two (22) of them are specialised public institutions, representing 81%. In value terms, the Trust Fund disbursed a total of Gh¢39.2 million through public institutions, accounting for 75% as of 30th June 2022. A special mention must be made of the National Commission for Civic Education (NCCE), an institution that is historically resource-starved - in the view of some, deliberately resource-starved. The donation of logistics such as vehicles to the (NCCE) by the Fund would have really helped their sensitisation work.

6.3 Transparency

The paper can confirm from the foregoing that, the COVID-19 National Trust Fund has been very open to requests for information on their activities. They have been quick to respond to invitations to present their activities and expenditure. Their work would have been more appreciated if they had been successful in disseminating their activities and expenses more effectively. The most viable medium for this sort of disclosure would have been a special website created for this purpose and periodically updated with current information on the pandemic and financial disbursements. According to the Trust Fund, it created its website in September 2020 purposely to communicate its activities to the Ghanaian public. However, challenges have been experienced with operating the website optimally, resulting in it being frequently inaccessible. Efforts continue to be made to find a permanent solution to the challenge.
7.0 The Future of the Trust Fund

Section 23 of the National Trust Fund Act, 2020 (Act 1013) relates to winding up of the Fund and provides for the future of the fund and related assets.

Under that section anytime the President is satisfied that there is no longer a need for the Fund, the Board shall ensure that any money in the bank account is transferred to the Consolidated Fund and any other asset acquired for and on behalf of the Fund is transferred to the appropriate state agency determined by the Minister responsible for the Fund. On 27th March 2022, when the President H.E Nana Addo Dankwa Akufo-Addo announced a relaxation of COVID-19 protocols such as mandatory nose masks wearing, there were only 72 active cases in Ghana. As of 19th July 2022, the Ghana Health Service COVID-19 Dashboard showed that there were 606 active cases. If the closure of the Trust Fund is tied to elimination of the COVID-19 pandemic, then the Trust must be in existence for a little longer.

Meanwhile, the Trust Fund appears to have immediate funding concerns. The first four (4) months of the Fund's operations brought in 95% of cash donations received. The rest have trickled in over 2 years. Out of the funds received, 79% have been disbursed and another 5% (GHS2.7 million) spent on administrative expenses. As funds became limited, the Trust Fund activated its mandate under section 7 (c) of the National Trust Fund Act, 2020 (Act 1013) which allows them subject to the provisions of the Public Financial Management Act, 2016 (Act 921) to invest monies of the Fund that are not required for immediate use in safe securities that are financially beneficial to the Fund. To this end, the paper established that, the Trust Fund had on 26th May, 2022 invested GHS3 million of the remaining funds in a security that guarantees an annual floor return of 18.85%. With COVID-19 appearing to become irrelevant in the minds of many, despite contradictory evidence, it is unlikely that the Fund would see a wave of donations akin to what we witnessed in 2020. Investing its cash at hand therefore appears to be a prudent decision on the part of the Board of Trustees.

The COVID-19 National Trust Fund seems to have achieved the objectives for which it was established as listed under section 2 of the Act. It appears to have taken internal financial control measures quite seriously. However, the true test of their efficiency and effectiveness in discharging the mandate given them under Act 1013 lies in an audit of their operations. The audit of the COVID-19 National Trust Fund for the period 1st April 2020 to 31st December 2020 has been conducted by the Ghana Audit Service and published in the 2021 Auditor General's Report.

The significant infraction for the COVID-19 National Trust Fund is 'Payment to COVID-19 Private Sector Fund for Procurement of Medical Equipment and Personal Protective Equipment not accounted for' (GHS254,203). According to the audit report, the COVID-19 National Trust Fund had paid the COVID-19 Private Sector Fund a total of GHS10,257,360 on June 16, 2020 for the procurement of medical equipment and PPE. However, an amount of GHS254,203 from the total amount paid, representing 2.5% of the total amount, had not been accounted for by the Private Sector Fund. The Auditors asked Management to ensure that the remaining amount was accounted for. The COVID-19 National Trust Fund has explained that the amount which was originally described as “unaccounted for” was in fact savings or unused money left over after the procurement of the agreed quantities of PPE and medical equipment. The Trust Fund formally requested...
the Ghana COVID-19 Private Sector Fund to refund the GH¢254,203.00 to the National Trust Fund as soon as possible. According to the National Trust Fund, the full amount has been refunded to them from the Private Sector Fund on 20th September, 2022.

This paper calls on the Ghana Revenue Authority (GRA) to publish the quantum of allowable tax deductions it granted, if any, to corporate institutions who supported the Fund within the period.

REFERENCES

Addo, M-A (official communication, February 28, 2022)
Addo, M-A (official communication, July 28, 2022)
Asare, W.C. (2022, June 20). Personal Communication [Personal Interview]
Constitution of the Republic of Ghana
COVID-19 National Trust Fund Act, 2020 (Act 1013)
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