



2019 CIVIL SOCIETY ORGANIZATION SUSTAINABILITY INDEX

For Sub-Saharan Africa: Ghana
October 2020

Cover Photo: A group of youth gather at a free WIFI spot to access the internet in Maputo, Mozambique in March 2020. USAID is developing programs in several countries, mainly in Africa, to promote universal internet access. The program enables free access to information for young people who may not have the financial resources to access the internet otherwise, thereby helping them to participate in democratic processes, practice citizenship, and exercise their right to information.

Photo Credit: Gideon Américo Muiambo, representative of the Movement for the Prevention of Crime (MHPC)

This photo was a submission in the 2020 USAID Center of Excellence on Democracy, Human Rights, and Governance photo contest.

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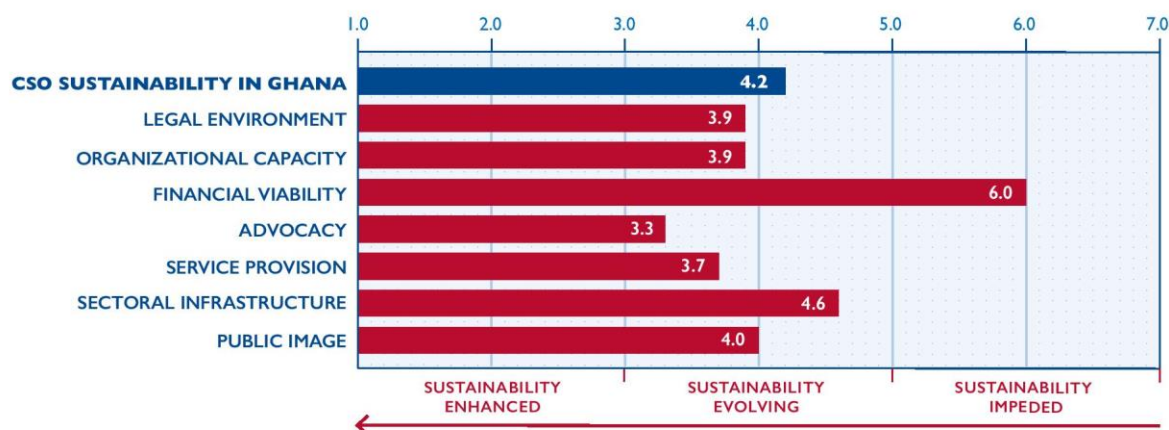
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OVERALL CSO SUSTAINABILITY: 4.2



The New Patriotic Party (NPP) government in Ghana served the third year of its four-year term in 2019. President Nana Addo Dankwa Akufo-Addo outlined his main policies in his third state-of-the-nation address at the Parliament House in February. His proposals included amending Articles 55(3) and 243(1) of Ghana's constitution to pave the way for the direct election of metropolitan, municipal, and district chief executives (MMDCEs) from candidates sponsored by political parties. The proposal was heavily debated amid concerns that partisan local elections would further polarize the country along tribal and political lines. A referendum on the amendment was scheduled for December 17, but on December 1, the president canceled the referendum and withdrew the proposed amendment, citing a lack of political consensus. This reversal elicited mixed reactions from civil society groups but was welcomed by the main opposition political party, the National Democratic Congress (NDC), which had campaigned vigorously against the amendment.

Another significant political development in 2019 was the outbreak of violence during the January 31 by-election to elect a new member of parliament for Ayawaso-West Wogon constituency after the incumbent died. Chaos erupted when masked vigilante groups wearing uniforms of national security forces and allegedly allied with the ruling party invaded some polling stations and attacked suspected opponents, injuring twenty-six people. CSOs and development partners condemned the bloodshed and called for a public investigation. In response to the outcry, the president established a four-member presidential commission of inquiry, which, six weeks later, submitted a report with recommendations to restructure the national security and police, disband the SWAT team of the National Security Council Secretariat, and punish those found to have violated the criminal code. The incident led to the passage of the Vigilante and Related Offenses Act, which bans acts of vigilantism in the country.

A dissatisfied public accused the government of security lapses following the murder of a prominent investigative journalist and the failure of the police to resolve the case of three kidnapped Takoradi girls, who were later found dead. The arrest and trial of alleged coup plotters and the rejection of a comprehensive sexual education curriculum proposed by the Ghana Education Service were other major topics of public debate. During the year, Ghana was visited by many members of the diaspora as part of the "Year of Return" promoting tourism.

Ghana's economy was generally stable in 2019. The government completed its Extended Credit Facility Program with the International Monetary Fund, which commended Ghana for its strong macroeconomic performance while highlighting possible external risks with the 2020 elections. Provisional data provided by the Ghana Statistical Services indicates a rate of 6.5 percent growth for the gross domestic product, compared to 6.3 percent in 2018. Exchange rate difficulties continued to plague the economy as the cedi depreciated drastically against the U.S. dollar in the third and fourth quarters.

The overall sustainability of Ghanaian CSOs did not change in 2019. Advocacy remained the most vibrant dimension and improved slightly with several successful efforts, including passage of the Right to Information (RTI)

Bill. CSOs' financial viability deteriorated slightly as donors shifted their priorities and reduced funding for STAR-Ghana, the major local funder. All other dimensions were unchanged.

The number of CSOs registered with the Department of Social Development (DSD) increased from 7,950 in 2018 to 9,251 in 2019. The increase may be attributed to banks' strict enforcement of laws dealing with money laundering and illicit financial flows, which require any company registered as a nonprofit organization (NPO) to submit a permit or certificate from the DSD to prove that it is registered before opening a bank account. Of the total number of CSOs registered in 2019, only 788 organizations renewed their operating permits during the year.

LEGAL ENVIRONMENT: 3.9



CSOs' legal environment did not change in 2019. CSOs register with the Registrar General's Department as NPOs limited by guarantee under the Companies Act. The process is fairly easy, although beginning in 2019 CSOs must include their constitutions with registration materials. After registration, CSOs acquire permits to operate from the DSD, which has oversight responsibility for NPOs. The permits are subject to annual renewal, but many CSOs do not bother to do this, because the rule is rarely enforced. Many organizations experienced delays in obtaining certification from the DSD in 2019, especially at the local level, mainly because of the DSD's lack of organizational capacity. For example, Syppa Ghana in Ashaiman, in the greater Accra region, waited nearly three months to finalize its registration. The Central Bank's stricter enforcement of measures to prevent

money laundering and terrorist financing, coupled with the delays in obtaining permits to operate, made it difficult for many newly registered CSOs to open bank accounts and start operations.

A new Companies Act was passed in 2019 to improve corporate governance standards. The act establishes the Office of the Registrar of Companies, an autonomous government body, to replace the Registrar General's Department; requires business owners to declare their beneficiaries before they can be incorporated; and establishes a central register of directors, to which the public will have access. Following passage of the act, the registrar served notice that it would more strictly enforce regulations requiring, among other things, that all companies, including NPOs, file annual returns signed by their directors. The Office of the Registrar of Companies indicated that in 2020 it will begin to delete the names of companies that are defunct or have failed to file annual returns in line with the statutes.

Company regulations stipulate that CSOs must operate in accordance with their objectives and nonprofit status. Because of past cases of abuse and neglect, the DSD regularly scrutinizes CSOs that operate social welfare services, such as orphanages and shelter homes, to ensure that children under their care are protected. Other CSOs, including those in research and advocacy, do not face significant hindrances.

CSOs in Ghana generally operate free of state harassment. The state does not censor CSOs. However, individual government officials occasionally chastise CSOs that they consider to be opposed to certain government policies. Both urban and rural organizations are able to participate in protests.

Grants and other income received by Ghanaian CSOs are not taxed. CSOs pay all statutory taxes on behalf of employees, including pay-as-you-earn and social security taxes, as well as indirect taxes such as value-added tax (VAT) on goods and services. CSOs are obliged to pay taxes on income from commercial activities, although government agencies are not known to tax CSOs on their sale of books.

CSOs are allowed to charge fees for services and establish social enterprises to earn income. CSOs may establish social enterprises, provided they amend their registrations, but few organizations have done so. CSOs may compete for government contracts to undertake projects such as research, capacity building, and infrastructure

projects, including the construction of educational facilities, but they rarely do so. CSOs are free to undertake fundraising campaigns and accept funding from foreign donors.

Since there is no law specifically governing CSOs, organizations seek legal advice from general practitioners or attorneys specialized in company law. Quality legal advice is available in the capital, Accra, and other major cities. CSOs are not usually involved in legal cases.

ORGANIZATIONAL CAPACITY: 3.9

The organizational capacity of Ghanaian CSOs was unchanged in 2019. CSOs usually have targeted constituencies and undertake activities in response to their identified needs. CSOs generally have good relationships with their constituents, and targeted beneficiaries usually participate in CSOs' activities. For example, the Wassa Association of Communities Affected by Mining (WACAM) mobilizes community members on the effects of mining. Its activities are community led in that community members call on WACAM to take action on situations that they deem detrimental to their well-being. A few CSOs occasionally face criticism from some of their stakeholders. For example, organizations that work on governance and anti-corruption issues may encounter difficulties in working with political parties. The Institute for Economic Affairs has been boycotted and accused of bias by the largest opposition party.



CSOs in Ghana have mission statements, which are required for registration. Unregistered and informal social movements and groups usually also have mission statements to define what they do. Most CSOs, including rural organizations, now have strategic plans, since STAR-Ghana, the country's largest local funder, requires strategic plans to accompany grant applications. However, most organizations are unable fully to implement their strategic plans because grants, including those from STAR-Ghana, rarely include core funding for institutional development. CSOs in Ghana typically measure their performance through feedback from donors and beneficiaries. Organizations that perform well tend to attract new or regular funding to continue their work. STAR-Ghana conducts due diligence and sustainability assessments of grantees to inform the award of new grants.

Nearly all CSOs have defined leadership and governance structures. Although CSOs must identify their board members at the time of registration, most CSOs, both large and small, are challenged by the composition and tenure of their boards. For example, most organizations have not changed their boards since they were established. Although clear divisions exist between the work of board members and staff, not all organizations, especially smaller and rural organizations, follow the best corporate governance practices, with the board of directors approving critical decisions. Most CSOs strive to be open and transparent with their funders and targeted beneficiaries but not with the public at large. In part, this is because the public sees CSOs as providers of charity, and CSOs fear that knowledge of their finances will induce the public to increase its financial demands, thereby affecting project implementation. In most organizations, conflicts of interest are limited because of stringent donor requirements for transparency in procurement and financial reporting.

The retention of staff members remains a significant challenge for both large and small CSOs. Most donors only provide project-based funding, which makes it difficult for CSOs to give long-term contracts to their staff members. Job security in the sector is low, and the rate of attrition is high. Although CSOs typically seek to develop staff skills through capacity-building workshops or specialized training programs, fewer organizations could afford these costs in 2019. Succession planning remains an unfamiliar concept to both urban and rural CSOs, although a few organizations, such as the West Africa Media Foundation, Center for Democratic Development (CDD-Ghana), and West Africa Network for Peace Building, have developed succession plans and engaged in successful transitions.

Many CSOs work with volunteers and interns on an ad hoc basis. CDD-Ghana regularly advertises internship programs and engages both local and international interns and volunteers every year. Most CSOs rely on the services of volunteers if they have large projects or short periods in which to complete activities. For instance, in 2019, some CSOs recruited volunteers to help their core staff implement activities related to local elections, such as voter registration and polling observation.

The use of information technology managers and other professionals is common, especially at large urban organizations. In recent years, many urban CSOs have begun to hire communications officers to help with media and public relations. They usually also have accountants on their permanent staff. Smaller organizations hire accountants on a temporary basis to help them with financial reporting but do not have the resources to hire other specialists.

In the current economic climate, CSOs have limited to no funding for furnishing their offices. Most project-based grants offer minimal support for replacing office equipment. With recent improvements in internet penetration, Ghanaian CSOs generally have access to internet services. Most staff check emails and convey and obtain information through smartphones. CSOs in both urban and rural areas use social media to disseminate information and showcase their activities.

FINANCIAL VIABILITY: 6.0



CSOs' financial viability deteriorated slightly in 2019. In general, Ghanaian CSOs are overly dependent on foreign funding. Major donors include the European Union, United Kingdom's Department for International Development, USAID, Oxfam, and United Nations Development Programme (UNDP). None of these donors announced major grant opportunities or calls for proposals for CSOs in 2019. Recent changes in donors' priorities have undercut the work of some organizations. For example, the Danish International Development Agency (DANIDA) reduced its aid from DKK 124.5 million (approximately \$19.7 million) in 2018 to DKK 23.850 million (approximately \$3.7 million) in 2019, while shifting its priority to trade and ending funding for STAR-Ghana. This loss of income reduced STAR-Ghana's budget and, going forward, the budgets of CSOs that

STAR-Ghana used to support with DANIDA funding. In addition, some donors now prioritize lesbian, gay, bisexual, transgender, and intersex (LGBTI) issues in their human rights programs. However, because of cultural and religious pressures, many human rights CSOs in Ghana are not interested in championing LGBTI issues, which has affected their funding streams.

Very few CSOs in Ghana have multiple sources of funding. Most rural and community-based organizations (CBOs) depend completely on one funding source. Although CSOs are making a conscious effort to diversify their funding sources, the search for funding has become very competitive as viable sources of funding continue to shrink. In addition, there is no centralized database on funding opportunities for CSOs other than UKAID's Devtracker, which does not list all opportunities. Finally, even if an organization has more than one source of funding, the funding is usually project based. Funders such as STAR-Ghana, Open Society Initiative for West Africa (OSIWA), and UNDP usually provide funding for one-year periods. Organizations can be drastically affected when multiple projects end at about the same time.

Domestic funding for CSOs is limited. The government does not fund CSOs in Ghana. However, some CSOs are able to obtain contracts with government agencies, and at times, service-providing CSOs partner with government agencies and private-sector companies at the local level to implement projects in water, sanitation, and health. For example, the Ghana AIDS Commission partners with CSOs on HIV/AIDS activities and maternal health education.

Local philanthropy is not well developed, and CSOs receive little funding from businesses other than a few that have corporate social responsibility (CSR) funds for specific activities. For example, a handful of mostly small

organizations receive funding from the corporate foundations of telecommunications and mining firms. But budgets for CSR programs are usually tiny, and the funding tends to come as small grants for short-term projects.

Ghanaian CSOs do not usually fundraise in local communities, mainly because the public perceives CSOs as sources of charity. Crowdfunding has not taken root, although informally, a few groups and individuals use crowdfunding to raise funds to pay for hospitalizations or surgeries for needy individuals. The Ghana Philanthropy Forum has started an awards scheme to promote giving in an effort to harness domestic resources to support the work of CSOs. CSO coalitions and membership-based organizations find it challenging to raise funds from their members. CSOs sometimes draw on in-kind support from local communities. For instance, traditional leaders and other local groups may grant organizations access at little or no cost to facilities such as community centers, public address systems, and classrooms. But such practices are not the norm.

Ghanaian CSOs do not earn substantial income from their services or products. For example, public interest in paying fees for CSOs' publications is low. Although advocacy is underway to popularize the concept of social enterprises, only a handful of CSOs have established social enterprises as sources of income. For example, in northern Ghana, Afrikids' Energy for Life initiative sells clean cook stoves to generate funds for its charitable projects. Beads of Hope in the Upper East region raises money through a social enterprise, Detiina, that trains young women to produce and sell jewelry. STAR-Ghana's sustainability program has helped some of its grantees to develop their capacity to earn income through paid services.

Many donors require sound financial management systems, and nearly all Ghanaian CSOs have such systems in place. Donors usually also require audit reports to be included with grant applications and additional audits to be performed after funding is awarded. STAR-Ghana conducts due diligence assessments to identify potential risks in organizations before disbursing funds. CSOs that receive regular donor funding use the services of professional accountants. The publication of annual reports and financial statements is common among large organizations, as well as smaller CSOs that receive funding specifically to carry out such activities.

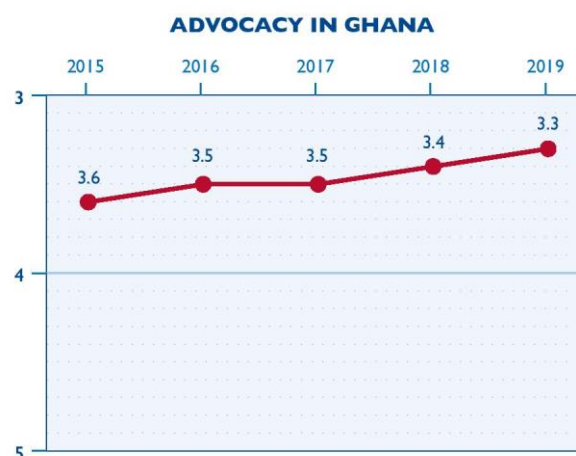
ADVOCACY: 3.3

Advocacy is the strongest dimension of CSO sustainability in Ghana and improved slightly in 2019. CSOs were active on a number of advocacy fronts. Notable achievements during the year included passage of the RTI Bill, cancellation of an unfavorable electricity contract by the government, and advocacy against a proposal to increase VAT.

CSOs have access to government institutions in various sectors from the national to the local level and work with them on many projects. Most engagements between the government and civil society are formalized and have clear objectives. In 2019, in response to CSO advocacy, the government terminated the concession agreement between the Electricity Company of Ghana and a private operator, Power Distribution Services Ghana Ltd., because of the latter's failure to meet fundamental terms in the contract.

However, political leaders often criticize CSOs' advocacy work, particularly if it focuses on changing the government's populist policy programs. In the latter part of 2019, some CSOs publicly campaigned against a proposal by the Electoral Commission to create a new register of voters, since they felt it was not needed and thus was a poor use of national resources. As their position was shared by the largest opposition political party, the issue became polarized, especially since the government supported the commission. Political polarization is widespread at the local level as well, which makes it difficult for smaller organizations to assess government policies critically.

Several CSOs and CSO coalitions focused on policy issues to respond to the needs of communities and interest groups in 2019. For instance, the Social Enterprise Development Foundation–Ghana published reports analyzing



expenditures for social protection and poverty reduction, taxation, child protection and welfare, and water sanitation, and hygiene. CSOs generally seek to consult with and mobilize key stakeholders to attract a critical mass of support. In 2019, the National Coalition for Proper Human Sexual Rights and Family Values, a mass civil society coalition led by faith-based organizations, formed to protest the comprehensive sexual education curriculum that the Ghana Education Service proposed to introduce. The coalition organized widespread public condemnation and compelled the government to suspend implementation of the curriculum.

Informal social movements are usually one-off groups that spring up in response to particular problems. They sometimes metamorphose into registered organizations. For example, OccupyGhana, which emerged as a middle-class social movement in 2014, is now established as a registered organization and works on issues of public accountability in collaboration with state agencies such as the Auditor General.

CSOs seek to influence public policy by engaging frequently with parliamentary committees and influential members of parliament. Although draft bills and memoranda are not always made available in advance, CSOs have learned to use their relationships with members of parliament to proactively obtain proposed legislation. In February, after the Ghana Revenue Authority announced that the local VAT would increase from 17.5 percent to 21 percent, a coalition of organizations led by Imani Center successfully advocated against the proposal, and the government was forced to abandon it. The Coalition on the Right to Information, composed of CDD-Ghana, GACC, Commonwealth Human Rights Initiative, Ghana Integrity Initiative, Media Foundation for West Africa, and other organizations, has worked steadily on the RTI bill since 2018 and engaged intensively with the parliament during final consideration of the bill, which was passed in 2019. The Economic Governance Platform (EGP), an umbrella body of fifteen CSOs, played an instrumental role in the passage of the Fiscal Responsibility Act, which capped the government deficit at 5 percent of GDP, prescribed punishments of the government if the limit was breached, and called on the government to give legal status to the new Fiscal Responsibility Advisory Council set up by the president.

CSOs also participated in a review of the Persons with Disabilities Act and continued to push for the passage of the Affirmative Action Bill through a number of protests in 2019. About twenty-one CSOs led by the Ghana Anti-Corruption Coalition (GACC) petitioned the Finance Ministry to provide detailed information on the GHS 2.75 billion (approximately \$510 million) savings reported in the government's mid-year budget review submitted to the parliament. Other advocacy efforts focused on the local government referendum and proposal to introduce partisan local elections. For example, a new group, the Coalition on the National Referendum and Election of MMDCEs, led public education and engaged with the parliament to support the referendum process. Organizations such as the Sustainable Development Goals (SDG) Youth Platform, a sub-platform of the Ghana CSOs Platform on SDGs, took advantage of their participation in STAR-Ghana's Youth Parliament to present a communiqué to the speaker of the parliament.

Calls for enactment of a law for the CSO sector became louder in 2019 after the Inter-Governmental Action Group of the Economic Community of West African States recommended that Ghana tighten up its laws related to money laundering, terrorist financing, and the financing of the proliferation of weapons of mass destruction. At the launch of the *2018 CSO Sustainability Index* report for Ghana, various speakers, including the executive director of the Institute for Democratic Governance (IDEG), called for speedy enactment of a CSO law to avoid international sanctions and ensure the sustainability of existing organizations. As part of the government's measures to foster stakeholder involvement, CSO representatives serve on the government committee developing a CSO law. At the end of 2019, consultants were helping develop separate bills on trusts and NPOs. The two bills are expected to reach the cabinet and possibly be sent to the parliament for passage before the end of 2020.

SERVICE PROVISION: 3.7



CSO service provision was steady in 2019. CSOs work in almost all sectors, and their broad diversification is the result of their ability to respond effectively to societal issues and failures in public service delivery. For instance, the CSO Platform on the SDGs disseminated a shadow report on the implementation of the SDGs in Ghana. As beneficiaries' needs vary from one region to the next, CSOs' services are usually adopted to local contexts. In mining communities, for example, most CBOs focus on environmental issues, while in rural and poor communities with weak public infrastructures, CSOs' primary focus is services related to water, education, and health care. CSOs' activities sometimes originate in response to news stories or appeals in the media. CSOs usually document their work with communities or other critical stakeholders so that they can showcase their

contributions when seeking funding.

Membership organizations often provide services that go beyond their members. CSOs typically provide services to a wide range of stakeholders, based on their interests and needs. While they do not discriminate on the basis of gender, tribe, social class, or religion, CSOs may target specific audiences for their projects.

The CSO sector in Ghana does not recover the costs of services that it provides. Unless they are registered as commercial services, most CSO services, including training workshops, are free of charge. Previous attempts by some CSOs to charge fees decreased the use of their services. For instance, the West African Civil Society Institute (WACSI) started to charge fees for training programs but eventually had to stop because of low demand. Some CSOs have begun social enterprises, but they are still at the incubation stage, and little information about them is available.

The government at both the national and local levels generally recognizes CSOs' contributions. For example, the government has awarded contracts to CSOs to undertake research and public education and partner on programs to combat HIV/AIDS, tuberculosis, and malaria. Because of the country's polarized political atmosphere, government officials sometimes seek to discredit CSOs that carry out independent studies to identify weaknesses or failures in public service delivery, since they see such reports as attacks on their stewardship. For instance, the Imani Center was subject to a barrage of criticism in 2019 after it gave the government a mediocre score in fulfilling its campaign promises.

SECTORAL INFRASTRUCTURE: 4.6

The infrastructure supporting the CSO sector was unchanged in 2019. A few organizations in Accra, such as WACSI and the African Women's Development Fund, offer CSOs access to information, sometimes about specific sectors. Intermediary support organizations that provide information or other services for CSOs generally do not exist, with the exception of several centers in universities, which offer some capacity-building programs in which CSOs can take part.

The STAR-Ghana Foundation remains the main local institution awarding donor funds to Ghanaian CSOs. In 2019, STAR-Ghana's funding went mostly to projects related to the 2020 elections, corruption, local governance, media, and social inclusion. STAR-Ghana provides technical support to its grant partners. Local foundations set up by corporations such as telecommunications and mining companies offer small grants, mostly for activities in health care and education.

Individual organizations generally do not exchange information. There are few networks that facilitate cooperation and few organizations through which the sector promotes its interests. Several coalitions represent and organize sub-sectors of CSOs, and CSOs often come together to share information on crucial policy or advocacy issues.

For instance, ahead of the botched national referendum on local government reforms, CDD-Ghana and IDEG collaborated on several advocacy efforts through meetings and public education.

CSOs have access to training on fundraising, monitoring and evaluation, project management, advocacy, proposal writing, and other topics. The institutions offering training include WASCI, universities, and private firms. The University of Cape Coast has developed paid post-graduate courses on CSO management, and in major cities such as Accra and Kumasi, private institutions provide management training. Most training offered by universities or the private sector involves fees, and very few organizations can afford for their staff to attend. The training materials are in English rather than local languages.

CSOs enjoy good relationships with the media and some government agencies based on shared interests and objectives. For instance, anti-corruption CSOs, such as the Ghana Integrity Initiative and members of GACC, collaborated with the Commission for Human Rights and Administrative Justice to commemorate National Anti-Corruption Week. The media have partnered with CSOs to carry out advocacy campaigns and deliver services. The Coalition on the Right to Information partnered with the Media Foundation for West Africa to raise awareness of the RTI bill among district assemblies and local media practitioners. CSOs occasionally partner with businesses, but little information about existing partnerships is available.

SECTORAL INFRASTRUCTURE IN GHANA



PUBLIC IMAGE: 4.0

PUBLIC IMAGE IN GHANA



CSOs' public image was stable in 2019. CSOs generally enjoy favorable media coverage, and many news stories appear in the mass media about CSOs' work. In 2019, the fifteenth annual Kronti ne Akwamu lecture series on gender and inclusive development organized by CDD-Ghana received massive media coverage. Most major radio and television stations turn to CSOs for independent reviews of policy and news stories. Rural-based CSOs have a harder time gaining coverage than urban organizations, particularly on mainstream television, and stories about their work are rarely aired. There is a clear distinction between announcements and advertising. Advertisements are generally expensive, and only a few larger urban organizations can afford their cost. Corruption Watch Ghana was able to advertise its roundtable discussion on public procurement systems in

the media thanks to a partnership with the Multimedia Group, which includes Joy FM, the media partner in the coalition.

The public's perceptions of CSO are generally good, except among party activists, who perceive CSOs' criticisms of the government as attempts to make the regime unpopular. Most people see CSOs as charitable organizations and broadly support their activities, especially in local communities.

Government perceptions of CSOs remain mixed. For instance, although a few members of parliament publicly accused CSOs of exerting undue pressure on the government to pass the RTI bill, the chairman of the Committee on Constitutional, Legal, and Parliamentary Affairs lauded CSOs for their support of the bill during the launch of a legislative watch initiative funded by STAR-Ghana. The business sector's view of CSOs is positive, although

collaboration is limited. Both the government and portions of the business sector recognize the expertise of CSOs and invite them to speak at their events.

Most urban-based CSOs have communication strategies and communication officers to manage their media relations and public visibility. Social media usage is high among both urban and rural-based organizations, with many organizations using Facebook to disseminate information.

CSOs in Ghana still do not have a general code of ethics, although most organizations include codes of conduct in their operational manuals. In 2019, as part of the grant award process, CSOs receiving funding from STAR-Ghana had to share their organizational codes of conducts with it. Most urban CSOs publish annual reports in both electronic and paper form and disseminate them on their websites and to their target beneficiaries.

Disclaimer: The opinions expressed herein are those of the panelists and other project researchers and do not necessarily reflect the views of USAID or FHI 360.

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