





Evidence-based Review of the DACF Disability Fund Disbursement and Management Guidelines



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FOREWORD

The Ministry of Gender, Children and Social Protection (MoGCSP) was created in 2013 by Executive Instrument (EI 1) to replace the former Ministry of Women and Children Affairs and brought together the National Council of Persons with Disabilities, the Department of Social Welfare and the Social Protection Directorate of the former Ministry of Employment and Social Welfare under one institutional oversight and mandate. The ministry is legally mandated to ensure gender equality, promote the welfare and protection of the rights of children and, empower the vulnerable, excluded, the aged and persons with disabilities, for sustainable national development. The creation of the new Ministry required a comprehensive institutional restructuring and realignment as well as clarity of roles and responsibilities in relation to policy formulation, advocacy, coordination, and service delivery. The Government of Ghana through the ministry has over the years prioritised its social development goals to promote issues of gender equity and equality through its agencies and secretariats.

The core functions of the ministry are to:

- a. Formulate gender, child development and social protection policies.
- b. Co-ordinate gender, child and social protection related programmes and activities at all levels of development.
- c. Develop guidelines and advocacy strategies for use by all MDAs and for collaboration with Development Partners and Civil Society Organisations (CSOs).
- d. Facilitate the integration of gender, children, and social protection policy issues into National Development Agenda.
- e. Provide guidelines and advocacy strategies for MDAs and other Development Partners (DPs) for effective gender and social protection mainstreaming.
- f. Ensure compliance with international protocols, conventions, and treaties in relation to children, gender, and social protection.
- g. Conduct research into gender, children, and social protection issues.
- h. Monitor and evaluate programmes and projects on gender, children, the vulnerable, excluded and persons with disabilities
- i. Ensure the availability of appropriate administrative and financial management systems and support services for the effective and efficient running of the Ministry/Sector for enhanced service delivery; and

j. Coordinate the development and implementation of human resource management, policies, systems, and programs consistent with the requirements of the sector to enhance service delivery.

One of the key strategic goals of the ministry is to create a socially inclusive society that promotes the rights of people with disabilities by ensuring a more effective inclusion of disability issues in national discourse. This is performed at all levels and across sectors through the National Council for Persons with Disability (NCPD), the agency of the ministry responsible for mainstreaming disability issues into national development efforts. NCPD exists as part of the institutional governance structures and processes as defined by departmental as well as agencies' roles and responsibilities of the ministry.

The National Council on Persons with Disability was established by the National Persons with Disability Act, 2006, Act 715. The Council is tasked with the responsibility of proposing and evolving policies that would mainstream persons with disability in the national development process. In line with its functions, the guidelines for the disbursement and management of the disability fund component of the DACF, was introduced in 2010 by NCPD and the Ghana Federation of Disability Organisations (GFD) to provide clear rules for payment to beneficiaries.

Recognising the need for evidence-based review of the guidelines for the disbursement and management of the district assembly common fund for persons with disability, the ministry collaborated with Ministry of Local Government, Decentralisation and Rural Development (MLGRD), Office of Head of Local Government Service, (OHLGS), and the service users themselves through GFD, with technical support from Ghana Somubi Dwumadie through UKaid funding from the British People. This close collaboration with key stakeholders, strategically positioned the ministry to implement core functions and its overall mandate effectively.

The DACF Disability Fund has since its establishment by the 1992 Constitution, been used to support a wide range of projects and programmes geared towards improving the lives of people at the local level. The rationale for this report is to provide information on the status of Implementation of the Guidelines for the Disbursement and Management of the DACF Disability Fund. Significantly, is to use the evidence to re-define the Ministry's strategic direction to facilitate an enhanced social protection intervention for people with disabilities, in fulfillment of its mandate, more so, when there has been considerable institutional restructuring and realignment over the past decade.

The ministry believes an evidence-based report on DACF Disability Fund will provide informed direction to further support NCPD and GFD to spearhead the promotion of rights and welfare of persons with disability, as well as strengthen and harmonise social protection interventions that better target the poor and vulnerable families. The evidence-based report of the DACF disability fund component will serve as a guide for an informed revision of the

2010 Guidelines for disbursement and management of the district assembly common fund for persons with disability, consistent with the UNCPRD as well as global commitments on disability.

It is the hope of the ministry that with the full implementation of the evidence-based report recommendations, it will contribute immensely to achieve both the national and international goals of promoting the rights, and productive inclusion of persons with disabilities, protection of their rights and wellbeing, as well as to ensure that no one is left behind in the developmental agenda of the country.

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EXECUTIVE SUMMARY

The disability fund component of the District Assembly Common Fund was introduced by the government of Ghana in 2005. The fund was established to reduce poverty among all categories of persons with disabilities in Ghana, particularly those outside the formal sector of employment, and to enhance their social image through dignified labor. The disability fund is part of government social protection effort to minimize poverty among persons with disabilities. Through this social intervention, persons with disabilities are allocated a percentage of the districts assemblies common fund to support disability-specific initiatives. The DACF disability fund allocation was instituted with the aim at reducing poverty among persons with disabilities and enhance their social image through dignified labour.

To ensure effective utilization of the fund, the guidelines for the disbursement and management of the fund allocated to persons with disabilities was developed by stakeholders and approved by the Ministry of Local Government, Decentralization and Rural Development in 2010. The guidelines made provisions for the disbursement and management of the fund in every district. The guidelines provide that "the National Council for Persons with Disability (NCPD) in collaboration with the Ghana Federation for Disability Organisations (GFD) under the authority of the Minister for Employment and Social Welfare, in cooperation with the DACF and with the approval of the Minister for Local Government and Rural Development, provides these guidelines on the disbursement and management of the DACF to Persons with Disabilities". After a decade of implementation, the GFD has received various complaints on the challenges in the implementation of the guideline from both PWD and District Administrators. In 2018, NCPD and GFD with support from their partners began the process for possible review of the guidelines for the fund but could not finalise it due to lack of resources.

With support from FCDO (formerly DFID) through the technical assistance of Ghana Somubi Dwumadie in March 2021, GFD conducted a study on the "Status of Implementation of the Guidelines for the Disbursement and Management of the District Assembly Common Fund Allocation for Persons with Disabilities". A total of 8 separate district level focus group discussions (FGDs) were conducted involving 95 individual stakeholders made up of mostly MMDA officials, persons with disability, members of the DFMCs, GFD regional and district presidents/chairpersons, across 8 out of the 16 regions in Ghana. Two teams were set up for the data collection comprising of officials from GFD, and Ghana Somubi Dwumadie.

The purpose of field work was to generate evidence from key stakeholders and end-users of the disability fund to inform policy. The evidence generation was meant to provide an informed understanding of the status of implementation of the guidelines 10 years after its adoption as a national policy. This focused mainly on the existence and composition of fund management committee, areas of funding, involvement of persons with disabilities including persons with mental health conditions in the management of the fund as well as involvement of persons with disabilities and organisations of and working for persons with

disabilities at the district level. The evidence-based review provides a comprehensive picture of the DACF disability fund implementation context and make strategic recommendations to ensure an enabling environment for inclusive disability policy review of the current guidelines.

Summary of key Findings:

This had been grouped into documentary evidence from literature and evidence gathered from the fieldwork. The documentary evidence is supported by a comprehensive literature review by Ghana Soumbi Dwumadie,¹ further classify this into implementation challenges and successes.

Implementation Challenges

- Noncompliance with the implementation guidelines
- Lack of access to the fund
- Delays in fund releases
- Insufficient funds
- Political interference

Implementation Successes

- Establishment of District Fund Management Committee (DFMC)
- Improving Lives of Persons with Disability

Findings from the Field

- Lack of in-depth knowledge on the provisions of the guidelines for the disbursement and management fund. Though the document exists for guidance, most of the stakeholders, particularly key members of the DFMCs, exhibited uninformed knowledge and understanding of the provisions.
- The composition of the Disability Fund Management Committee differs from one MMDA to another.
- The composition of the disability fund management committees was largely inconsistent with the provisions in the guidelines and membership varied across the MMDAs nationwide.
- The National Council for Persons with Disability (NCPD), the oversight actor entrusted with the key responsibility for disbursing and managing the disability fund for PWDs, was visibly missing on almost all DFMCs nationwide.
- Appointments to the DFMCs, were gender neutral and made no considerations in ensuring there is a quota for women's meaningful participation on the fund management committees.
- O There are varied differences in the mode of disability fund application. While some DFMCs within the MMDAs, have developed fund application forms or template that require applicants to complete by filling or ticking applicable field, other MMDAs do not have any application template and only request applicants to write an application letter and attach a passport picture to the written application.

¹ See appendix 1 for full literature review report by Ghana Somubi Dwumadie

- There are nationally no standardised criteria for beneficiary selection. The selection process differs from MMDA to MMDA and it was evident in all the districts visited.
- There are no standardised criteria for setting the benefit threshold, and as may be determined by the DFMCs, this differs across the different range of MMDAs.
- Following the 2017 new directive by the common fund administrator, the disability fund management has witnessed some structural changes.
- Lack of transparency and poor accountability in the management of the fund at all the different levels.
- Political interference is a major operational issue contributing to implementation setbacks of the DACF disability fund.
- The lack of proper vetting process by the committees and poor database on PWDs leads to multiple benefits by some PWDs either from the same MMDA or from another Assembly.
- There is a glaring gap in data on persons with disability at the district levels, and generally in Ghana, which makes disabilities even less visible.
- Inequitable distribution of the Common Fund, to the disadvantage of the Rural Less Endowed district assemblies.
- There were some best and promising practices of case studies which had been documented for learnings, and knowledge sharing.
- Finally, evidence generation suggests that the 2010 DACF disability fund disbursement and management guidelines are longer fit for purpose and require policy revision.

Summary of suggested recommendations for policy change

- Government and CSO stakeholders should bring the evidence to bear on, and support review of the current DACF disability fund disbursement and management guidelines.
- The revision of the 2010 guidelines, should build on the review process initiated by NCPD and GFD, and support revision of the guidelines.
- Policy advocacy change and work with DPOs through GFD is needed to facilitate building on the process that started in 2018, and finalise more concretely, revised DACF disability fund management guidelines or Policy.
- Strengthen and reform the fund management and administrative Structure
- Improve data and information on people with disabilities
- Timely Release and Disbursement of Disability Fund
- Openness, Reporting and Information-flow
- Advocacy/awareness raising on the rights and responsibilities of Persons with Disability
- Disability Inclusion Training and Capacity Building
- Adopt a social equity intervention devoid of widening social disparities but instead aimed at bridging social equity gaps
- Compliance with the guidelines
- Uniform Criteria for beneficiary Assessment and Profiling
- Standardise the Application Template/Form

ACRONYMS

BAC Business Advisory Center.

DACF District Assembly Common Fund

DFMC District Fund Management Committees

DPOs Disabled People's Organizations

GFD Ghana Federation of Disability Organisations

GNAD Ghana National Association of the Deaf

IGF Internally Generated Fund

LEAP Livelihood Empowerment against Poverty

MEHSOG Mental Health Society of Ghana

MLGRD Ministry of Local Government and Rural Development

MMDAs Metropolitan, Municipal and District Assemblies

MMDAs Metropolitan, Municipal and District Assemblies

MMDCEs Metropolitan, Municipal and District Chief Executives

MoF Ministry of Finance

MoGCSP Ministry of Gender, Children and Social Protection

NCPD National Council on Persons with Disability

NGO Non-Governmental Organization

OECD Organisation of Economic Development

OHLGS Office of the Head of Local Government Service

OPWDs Organizations People's With Disabled

PWD Persons with Disability

SDGs Sustainable Development Goals

SHGs Self-help Groups

SEND Social Enterprise Development Ghana

UN United Nations

UNCRPD United Nation Convention on the Right of Persons with Disability

UNDP United Nations Development Programme

WHO World Health Organization

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SECTION ONE: INTRODUCTION

Globally, people with disabilities have poorer health outcomes, lower educational achievements, less economic participation, and higher rates of poverty than people without disabilities. This according to WHO, is partly because people with disabilities experience barriers in accessing services that many of us have long taken for granted, including health, education, employment, and transport as well as information. These difficulties are exacerbated in less advantaged communities. Based on fundamental human rights and commitment to the principle of leave no one behind (LNOB), countries are to ensure those experiencing the worst forms of poverty, marginalisation and discrimination receive priority attention and access to the resources and programs being mobilized by the global goals.²

Ghana, in the past 16 years, adopted the Disability Fund which was introduced in 2005 as a social protection intervention aimed at mitigating the vulnerability of persons with disability. Five years after the introduction of the disability fund, a mechanism was established to guide the disbursement and management in order to ensure efficiency and effectiveness its utilization. This mechanism, referred to as the guidelines for disbursement and management of the District Assembly Common Fund (DACF) allocation to Persons with Disability has been in existence since 2010. As a social protection intervention for persons with disability including mental health disabilities, the fund allocation was meant particularly, to provide skills training, income generating activities, education of persons with disabilities, raise awareness on disability issues, support organisational development for various Organisations of Persons with disabilities (OPWDs), and the provision of technical aids. The DACF disability fund allocation was aimed at reducing poverty among persons with disabilities and enhance their social image through dignified labour.

Since its adoption and subsequent implementation from 2010, several administrative changes have been made in terms of institutional reorganisation and structural alignment at the ministerial levels in Ghana. Post 10-years of operational implementation, it becomes imperative to catalogue evidence on the efficiency of the fund disbursement and management as well as the operational effectiveness of the Fund utilisation. More concretely, establish the status of the guidelines, the implementation lessons, and practices, as well as identify challenges and gaps, to help understand if the Disbursement guidelines are fit for purpose or not. It is also an opportunity to examine the operational challenges and issues that would help improve disability fund management. The evidence from this can inform the advocacy strategy for a review of the guidelines for disbursement and management of the fund in alignment with UN Conventions and international disability protocols, and in compliance with Agenda 2030.

² Options/Ghana Somubi Dwumadie (2020) Landscaping analysis of mental health and disability, policies, laws, plans and services

Overview of the 2010 Guidelines for Disbursement and Management of DACF Disability Fund for Persons with Disability (PWD)

The 1992 Constitution of the Republic of Ghana provides for the establishment the District Assembly Common Fund (DACF) and mandates Parliament to "annually make provision of not less than five per cent of the total revenues of Ghana to the District Assemblies for development; and the amount shall be paid into District Assemblies Common Fund in quarterly instalments" [The 1992 Constitution, Article 252:2]. The DACF is a development fund designed to ensure a more equitable distribution of national resources for development in every part of the country.

Each year the Common Fund Administrator prepares the Formula for sharing of the Fund and places it before Parliament for approval. Following approval, the Administrator disburses the Fund to the various District Assemblies based on the approved Formula. The Fund is used to support a wide range of projects and programmes geared towards improving the lives of the people at the local level. Specifically, section 2 of the DACF Act, ACT 455, mandates the allocation of a percentage [currently 3%] of the DACF as a statutory fund towards the minimisation of poverty of all persons with disability, particularly those outside the formal sector of employment and the enhancement of their social image through dignified labour.

In 2010, as part of efforts "for effective utilization of the DACF allocation to persons with disability, National Council on Persons with Disabilities (NCPD) in collaboration with the Ghana Federation of Disability Organisations (GFD) under the authority of the Minister for Employment and Social Welfare (now Minister for Employment and Labour Relations), in cooperation with the DACF and with the approval of the Minister for Local Government and Rural Development (now Local Government, Decentralization & Rural Development), provided guidelines for the disbursement and management of the DACF allocation to persons with disabilities".

However, very little field data has been collected to explore the effectiveness of the DACF and implementation of the guidelines for disbursement and management of the persons with disabilities share of the Fund. So, after more than 10 years of implementation, it is important to establish whether or not the guidelines are fit for purpose. As one of the key actors in the implementation of the guidelines, GFD has a responsibility to make a case for a review of the guidelines, in line with its core advocacy work.

In 2018, NCPD and GFD with support from their partners began the process for possible review of the disability fund disbursement and management guidelines, but the process was halted due to lack of resources. In addition to resource constraints, there was also cabinet reshuffle, which affected NCPD at the time to with the needed resources to lead the process. Since then, there has heightened call for support to continue the policy review process through user-led dialogues, leading to evidence generation to support the advocacy for review of the guidelines. Significantly, the impact of COVID-19 more than ever, brought to the fore the high-risk faced by persons with disabilities including people with mental health

disabilities, in an emergency response. The call for support attracted funding from FCDO (formerly DFID) through the technical assistance of Ghana Somubi Dwumadie.

Purpose of the DACF Disability Guidelines Review Process

The purpose of the evidence generation activity was to provide information on the current state of the DACF and the guidelines for disbursement and management of the persons with disabilities share of the fund to inform other future policy and programme interventions. The exercise was used to collate views of key stakeholders, persons with disabilities themselves through their representative organisations on the implementation of the guidelines and how these may be resolved with informed policy change.

Specifically, the objectives were to:

- **1.** Gather evidence regarding any issues with the guidelines for disbursement of DACF to establish and/or build data for advocacy.
- **2.** Use the evidence generated to support the need for the review of the guidelines, if relevant.
- 3. Revisit conversations with disability networks for policy dialogue and engagement with GoG stakeholders namely MLGRD, MoGCSP, and DACF with informed evidence for the review of the DACF disbursement guidelines.
- **4.** Use the evidence-based review as the basis for advocacy for a revised the DACF disability fund disbursement and management guidelines.

Approach and Methodology

A collaborative working relationship was established for this report. Close cooperation between GoG staff from MoGCSP, MLGRD, OHLGS and GFD, a representative umbrella of organisations of persons with disabilities was ensured to facilitate the implementation of the evidence generation exercise. The primary data gathering aspect of the evidence generation was led by GFD with technical support from Ghana Somubi Dwumadie (Ghana Participation Programme). Prior to the evidence gathering exercise, GFD led its internal strategic committee, including research and advocacy committee representatives, to review the data collection tools.

Ghana Somubi Dwumadie through its technical support, led the engagements with MoGCSP and MLGRD on user led approaches and facilitated interagency coordination review planning processes. As part of Ghana Somubi Dwumadie's technical assistance to the review process, a comprehensive review of literature was carried out as preliminary findings, which were used to further triangulate the data from the field.

For greater disability user-led and ownership by GFD and GoG buy-in, the approach to the exercise was guided by the following methodological principles:

• **Holistic approach.** The evidence generation and reporting adopted a systemic/holistic approach on key thematic areas namely operational and implementation challenges/gaps, including policies, legislation, plans; strategies for inclusion; share of percentage allocation, releases, disbursements, and timeliness;

accessibility for people with disabilities, including people with mental health conditions, and across different cross-cutting themes (such as self-reliance, inclusion, gender and participation).

- **Pragmatic and user-oriented approach.** The documentary evidence and recommendations are to be used by the users through representative organisations for persons with disabilities, including persons with mental health conditions, to improve the DACF disability fund allocation disbursement and management. To achieve this, the report concentrates on concrete policy recommendations, with stakeholder validation inputs from key Ministry of Gender, Children and Social Protection (MoGCSP), Ministry of Local Government and Rural Development (MLGRD), Office of Head of Local Government Service (OHLGS), Mental Health Authority (MHA), National Council for Persons with Disability (NCPD) and Ghana Federation of Disability Organisations (GFD).
- Approach based on participation and learning. The overall approach for the
 evidence generation was inclusive, participatory, and collaborative, that ensured that
 all actors and interview participants contribute to the findings and recommendations
 of the study. The primary data collection component was designed to ensure that the
 inputs of all stakeholders, their expectations and needs, their comments and
 observations were taken into consideration. Multiple tools, including fund
 management interviews, interviews, and triangulations with disabled people's
 organisations (DPOs) where briefings, and debriefings were used.

Confidentiality and Ethical Standards

The field work ensured that the data collection strategy and questions were in line with ethical standards for data collection. All necessary measures were considered to ensure a safe and respectful environment for all participants. Language-sensitive communication and respect for the confidentiality of the participants were ensured.

There was consent from all respondents.

Approach

The fieldwork was approved by MLGRD and through the Office of the Head of Local Government Service (OHLGS), a supporting official introduction letter was secured that gave credence and integrity to the evidence gathering exercise. The country was zoned into two, zone A and B, and accordingly, two teams were constituted to gather evidence from 8 MMDAs respectively across 8 out of the 16 regions in the country. The data collection took place from Tuesday March 9, 2021 and ended on March 19, 2021.

Sampling

The target sampled audience were members of the District Fund Management Committee (DFMC) and DPOs' representatives in all the selected districts. The primary data were obtained through focus group discussions. Group interview sessions were held with DPOs and the DFMC members separately in all the 8 MMDAs. All participants' responses were treated with utmost ethical protocols and confidentiality.

Fieldwork: Stakeholder Consultations and Interviews

In-depth consultations and group interviews were conducted with fund managers and DPOS to gather information and data on their perspectives with regards to the DACF disbursement and management guidelines, as well as disability inclusion. The purpose of the fieldwork was to fill in the information gaps from the desk-based and literature review, as well as other studies.

During the fieldwork, fair opportunity for meaningful consultations and genuine engagements were reflected in the execution of this work/activity. In doing this, a total of 8 separate group interviews were conducted involving 95 individual stakeholders who were mostly MMDA officials, persons with disability, members of the DFMCs, 8 GFD regional and district presidents/chairpersons, across 8 out of the 16 regions in Ghana. The respondents were purposively identified as key informants who could speak with some authority on DACF disability fund guidelines implementation, disbursement and management efficacy, and any challenges relating to its operational effectiveness; particularly relating to utilisation and disability inclusion.

The evidence gathering involved syndicate (group) sessions anchored on inclusive, participatory, and collaborative approaches, not only to enable cross discussions and expression of views by all actors, but to ensure that all actors had a fair opportunity for meaningful consultations and genuine engagements.

A total of eight (8) regions and eight (8) districts were used for the exercise (see table 1 below). Two teams were set up for the data collection. The team members were from GFD, Ghana Somubi Dwumadie and MoGCSP.

Table 1: List of Sampled Regions and Selected Districts for Evidence Gathering

REGIONS	MMDAs
Upper East	Bongo District Assembly
Northern	Tamale Metropolitan Assembly
Ahafo	Asunafo North Municipal Assembly
Ashanti	Oforikrom Municipal Assembly
Western North	Sefwi Wiawso Municipal Assembly
Central	Assin South District Assembly
Volta	Ho Municipal Assembly
Greater Accra	Ga East Municipal Assembly

Limitations

The key limitations of the exercise were the restricted geographical scope and focus due to time and resource constraints. It was envisaged early that this could compromise the representativeness of the sample size. To mitigate this, a comprehensive desk review was carried out by Ghana Somubi Dwumadie, and findings from the literature review were sufficiently used to support the field findings. It was also meant to provide strong level of confidence for the report, not allow the issue of representativeness take away the main essence for the evidence generation for informed advocacy, to call for the review of the DACF guidelines.

While access to DPOs was not an issue, it was very difficult in some MMDAs to reach members of DFMC to schedule interviews and obtain key documents. Notwithstanding, arrangements were made for validation meetings with key policy decision makers and all participating MMDAs.

Quality assurance

At every stage of the process, quality assurance was ensured through in-depth checks and debriefings. Rigorous technical oversight and consultative engagements were instituted to ensure absolute data credibility, performance, and delivery excellence. The team reviewed topic guides and procedures in advance of data collection to assess appropriateness and sensitivity. Continuous engagements including periodic briefing and debriefing were used to consult and inform on work progress as well as risk mitigation strategies.

Organization of the Report

The report is organized into four sections. This introductory section one presents the background and contextual overview of the guidelines for the disbursement and management of the District Assembly Common Fund allocation to persons with disability, and the methodology used. Section two provides literature review of documentary evidence of studies on the outlook of the disability fund operational implementation issues. Section three covers the analysis and discussions of the field findings. Section four finally presents a summary of conclusions and recommendations for priority and policy focused areas and informed advocacy for the review of the DACF guidelines.

SECTION TWO LITERATURE REVIEW

Introduction

This section summarises key findings from literature around the effectiveness of management of the Disability Fund. It focuses specifically on fund implementation, the successes and challenges as reported in other studies conducted over the past 10 years.

Fund implementation

As mentioned earlier in this report, the Disability Fund is a proportion of the DACF which is transferred from the central government to the local governments for development on a quarterly basis. DACF is managed by the Office of the Common Fund Administrator at the central government level. At the local government level, the implementation and management of the Disability Fund lies with the Metropolitan, Municipal and District Assemblies (MMDAs). Each MMDA is expected to have a special committee, Disability Fund Management Committee (DFMC), which is oversees the fund disbursement process. The responsibilities of the DFMC include vetting and approving fund applications, monitoring the fund utilization and presenting quarterly reports on the management of the fund to District Assembly.³

Challenges

Available literature suggests that the implementation of guidelines for the disbursement and management a little over 10 years, has been faced with a mixture of operational issues. Studies have established that although the DACF disability fund disbursement and management guidelines have been in place since 2010, evidence from the studies suggest that implementation has been challenging. These challenges as gleaned from literature have been grouped and summarized in broad categories as below.⁴

Noncompliance with the implementation guidelines

The lack of compliance with the implementation of the guidelines by the District Assemblies is recognised by several studies as one of the main operational challenges. According to the Ghana Federation for Disabled (GFD), the MMDAs who are charged with the overall responsibility of implementing the fund do not accept the NCPD (2010) guidelines and therefore, they do not follow them.⁵ Another study by Adamtey et al (2018) found that some of the Assemblies did not strictly comply with the guidelines and made allocations to persons with disabilities without stating the purpose. This failure by MMDAs to comply with the NCPD guidelines has been compounded by some gaps in the guidelines themselves.⁶

National Council on Persons with Disability. Guidelines for the Disbursement and Management of the District Assembly Common Fund for Persons with Disability.; 2010

⁴ Options/Ghana Somubi Dwumadie, 2021 Literature Review: Disability Fund in Ghana

⁵ Adjei N. Putting decision into action: The Disability Act of Ghana. Six years down the line. undefined. Published online 2013.

⁶ Options/Ghana Somubi Dwumadie, 2021 Literature Review: Disability Fund in Ghana

As a result, there have been reports of unethical dealings by the fund controllers ranging from corruption to discrimination in the way the funds are allocated to the beneficiaries.⁷

Lack of access to the fund

Documentary evidence gleaned from other studies suggest that despite the existence of the DACF guidelines for over a decade, many studies and review works have reported that only few persons with disabilities have been able to access the Disability Fund.⁸ In a recent study by Opoku et al (2019), many persons with disabilities interviewed, stated that they had applied for the grant several times but had not been successful. In addition to the low number of beneficiaries, a study by Adamtey et al (2018) found that the geographical coverage of the fund was limited as many of the beneficiaries were from the major towns and the district capitals. In this case, many persons with disabilities living in rural settlements and villages remote from the district capitals did not have access to the fund as most were not even aware that the fund existed.

Delays in funds release

Persistent delay in the release of funds is widely established by available studies as one of the major challenges associated with the Disability Fund. In a study by Edusei et al (2018), it was reported that although the grant is supposed to be disbursed quarterly, some beneficiaries have claimed that it took years before they received the grant. Another study reported that the 3% of DACF is not always made available for the use of those it is intended to benefit, especially people with mental health disabilities. Observably, these difficulties in the disbursement makes planning difficult, thereby affecting fund utilisation and its effectiveness.

Insufficient funds

Many studies have reported that the amount of funds allocated to beneficiaries are often inadequate to meet the intended purpose. According to Edusei et al (2018) and Okrah (2016),¹¹ some beneficiaries of the Disability Fund have reported they were given little or fixed amounts, regardless of their needs, which made it difficult for them to invest the

Dasmani L. Ghana's Disabled Fund Managers Violate Guidelines | Features | Peacefmonline.com. peacefmonline.com. Published November 26, 2014.

Ocran J. Disability and Stigma: Interrogating Middle-Class Experiences in the Social Spaces of Ghana.; Adjei-Amoako Y. Promoting inclusive development in Ghana: disabled people's and other stakeholders' perspectives. Dev Pract. 2016;26(7):865-875.; Boamah DB. Examining Interventions in Ghana towards Protecting the Human Rights of Persons with Physical Disabilities. Published online 2019. Accessed March 22, 2021.; Arkorful VE, Anokye R, Basiru I, Hammond A, Mohammed S, Micah VB. Social Protection Policy or a Political Largesse: Disability Fund Efficacy Assessment and Roadblocks to Sustainable Development Goals. Int J Public Adm. 2020;43(15):1271-1281.

⁹ Edusei A, Adjei-Domfeh P, Mprah WK, Opoku M, Badu E, Appiah SC. Assessing the Impact and Uses of the Disability Common Fund Among Persons with disabilities in Kumasi Metropolis in Ghana | Review of Disability Studies: An International Journal. Rev Disabil Stud An Int J. 2018;12(4):14.

¹⁰ Ghana Somubi Dwumadie 2020 Community Based Rehabilitation Initiatives for Mental Health and Disability in Ghana.

Okrah M. The Control Mechanisms for Effective Disbursement and Utilization of the District Assembly's Common Fund in the Karaga District of Northern Ghana. Br J Econ Manag Trade. 2016;11(4):1-15.

money in meaningful ventures. Ghana Somubi Dwumadie reported that the recent COVID19 and the call for emergency relief, brought to the fore the aggravation of this challenge besides the above-mentioned challenges.¹²

Political interference

Although the NCPDs Guidelines are operational, the disbursement and management of the Disability Fund has been saddled with opacity and partisan politics.¹³ According to the literature, MMDAs are presumed to be too political because, according to their organisational structure, they are governed by political government appointees who may pander to the political ideologies of a certain political party.

Other Challenges

Documentary evidence uncovers other associated challenges with the Disability Fund disbursement and management. These include:

Lack of accurate data on the prevalence and of disability by category and persons with disability population in the country and its segregation at across the districts. This makes it difficult to estimate the sufficient allocation needed for the Disability Fund and monitor the number of persons with disabilities who have benefited from the fund.

Institutional barriers and bureaucracy relating to complicated application procedures that persons with disabilities have to follow in order to receive formal support from the fund have also been reported as some of the barriers to effective utilisation of the Disability Fund. According to a study by Esaaba (2019), the process of accessing the fund is cumbersome and has compelled some persons with disabilities to give up on the application process.¹⁴

Successes

Notwithstanding the myriad of challenges, that have plagued implementation of the DACF disability fund disbursement and management guidelines, some significant successes had been documented towards achieving its goal.

Establishment of District Fund Management Committees (DFMCs)

The first milestone achieved was the establishment of the NCPD guidelines in 2010 to guide the fund disbursement and management. According to GFD, the guidelines "increased effectiveness in the process of management and utilisation of the fund". ¹⁵ In accordance with the guidelines, MMDAs have established Fund Management Committees to oversee

¹² Options/Ghana Somubi Dwumadie 2020 Rapid Assessment of COVID-19 in Ghana, specifically relating to people with disabilities and mental health disabilities

¹³ Options/Ghana Somubi Dwumadie, 2021 Literature Review: Disability Fund in Ghana

¹⁴ Ghana Somubi Dwumadie 2020 Community Based Rehabilitation Initiatives for Mental Health and Disability in Ghana. Options/Ghana Somubi Dwumadie, 2021 Literature Review: Disability Fund in Ghana

¹⁵ Federation of Disability displeased with new common funds distribution process - MyJoyOnline.com

implementation of the funds in their respective districts. The committees are made up of NCPD representative, social services sub-committee, Department of Social Welfare, District GFD representative and a co-opted technical member(s) selected by the committee. According to three of the 16 studies included in the comprehensive literature review in support of this study, the diverse composition of the committee ensures that the views and interests of different stakeholders, especially those of the persons with disabilities, are well represented in the decision-making process.

Improving Lives of Persons with Disability

Evidence from available studies informing this report, to some extent suggest that the Disability Fund has helped to improve the lives of the beneficiaries in various ways. According to Edusei et al (2018) and Abrokwah (2018), the Disability Fund has been used to create awareness of disability issues, fund self-help groups and Disabled People Organizations (DPOs), for disabled people and improve persons with disabilities' access to basic needs such as health care and education. According to a report by Ghana Somubi Dwumadie 2020, the fund has improved financial sustainability for self-help groups and DPOs by providing a somewhat reliable source of funds for their operations.

In a number of studies synthesised in the literature review, beneficiaries reported having used the funds to train themselves in employable skills and to engage in income generation activities such as farming and small business, as well as pay school fees for their children and assisted them in purchasing assistive devices. Overall, the Disability Fund has been a source of livelihood for the beneficiaries, especially those who are unemployed.

In addition to the above, Studies have shown that the direct impact of social grants to vulnerable populations is not limited to their direct pocket expenditure but extends to other people, sometimes distantly related (Barrientos & DeJong 2006).¹⁹ This is especially so in the extended family system in Ghana where individuals may depend on other family members for support. In fact, some persons with disabilities are breadwinners of their extended family members in Ghana. This means that the benefits of the fund impact the lives of other people beyond those of the fund beneficiaries. The full literature review can be found in appendix one.

¹⁶ See appendix 1 for full literature review report by Ghana Somubi Dwumadie

¹⁷ Ghana Somubi Dwumadie, 2020 Mapping of SHGs and DPOs

¹⁸ Ghana Somubi Dwumadie, 2021 Literature Review: Disability Fund in Ghana

Barrientos, A., & DeJong, J. (2006). Reducing child poverty with cash transfers: A sure thing? Development Policy Review, 24(5), 537-552.

SECTION THREE FIELD FINDINGS

"The Disability Fund had been used to create awareness of disability issues, fund self-help groups and Disabled People organizations (DPOs), for disabled people and improved persons with Disabilities access to basic needs such as health care and education".

Nationally, the guidelines for disbursement and management of the district assembly common fund for persons with disability is highly recognised as the key sub-national mechanism that exist to guide disability fund disbursement. The guidelines to some extent have since 2010, brought about increased effectiveness in the process of management and utilisation of the fund.

Operationalisation of the guidelines

Findings from the field reveal lack of in-depth knowledge on the provisions of the guidelines for the disbursement and management of the fund. Though the document exists for guidance, most of the stakeholders, particularly key members of the DFMCs, exhibited uninformed knowledge and understanding of the provisions. This results in use of administrative discretion culminating in improper enforcement of the guidelines and breaches. For example, most of the DPOs and members of the fund management committee have little or no knowledge of the provision that:

- **1.** "The office of the Administrator of DACF shall in each quarter furnish the NCPD with allocations made to MMDAs and their corresponding percentage for PWDs".
- **2.** "There shall be no borrowing from the account.
 - **a.** However, loans can only be arranged by NCPD and on the basis of approval resolution passed by the relevant MMDAs with minutes attached.
 - **b.** This shall enable deductions at source for repayment".
 - **c.** NCPD to "receive notice of quarterly release to MMDAs from the office of DACF and circulate same to relevant organizations in the disability sector".

Most persons with disability spoken to at the district level, do not know some of these specific provisions and therefore continue to witness breaches and abuse of administrative powers by MMDAs. In the words of a PWD interviewed, "the 'Committee' has become the committee of the assembly, ... we are not involved, and they think for us". According to a chairman of a DFMC, "most members are ready to resign due to breaches...funds are in the bank not being used but kept reducing; the fund is not being disbursed to persons with disabilities but rather being used by the districts to their own interest". This is against the guideline which does not give room for the various MMDAs to borrow money from the fund.

²⁰ Stakeholder Field Interviews 2021

Demonstrably, the complaints by most stakeholders that were involved in the consultations show the lack of in-depth knowledge about the provisions and the related sanctions, if they exist, for breaches and non-compliance. Perhaps the absence of the NCPD in the districts could be a key contribution to this operational issue.

Existence of the District Fund Management Committee

"The guidelines for disbursement exist but not accessible to PWDs... hard copies are not commonly available... braille copies are unavailable for the visually impaired" DPOs/DFMCs.²¹

Per the DACF guidelines, "each MMDA shall form a special committee, Disability Fund Management Committee (DFMC), for the purpose of managing the DACF for PWDs". The membership of the committee will include:

- District representative, NCPD
- Chairperson, Social services sub-committee
- District Director, Department of Social Welfare
- District GFD representative
- Co-opted technical member(s) that the Committee deems fit".

The fieldwork uncovered that each MMDAs visited have set Disability Fund Management Committee to oversee the disbursement and management the DACF allocations to PWDs. While there were variations in the period of formation vis-à-vis years in existence post the policy and its adoption in 2010, there were some kinds of resemblance of an oversight committee for managing the DACF for PWDs. Notably, the year of formation depended on the period of creation of the respective MMDA. The older the MMDA, longer the existence of the DFMC. For existence, Bongo and the Ho Municipality, in particular, one of the oldest Assemblies, had DFMC established in 2011, according to the coordinating director of Ho Municipality, this happened "a year after the introduction of the guidelines". One of the newest Oforikrom Municipal which was carved out of the Kumasi Metropolitan Assembly and inaugurated with a LI 2291 in 2018, formed its DFMC in the same year of the creation of the Assembly.

Notwithstanding the number of years of existence, the composition of the Disability Fund Management Committee however, varied across MMDAs nationally.

OPERATIONAL GAPS/CHALLENGES

Composition of the Fund Management Committee

The compositions of the disability fund management committees across districts were inconsistent with the provisions in the guidelines and membership varied across the MMDAs nationwide. There was generally non-adherence to what are stipulated in the guidelines. The findings show administrative abuse under the provision for "co-opted"

²¹ Stakeholder Field Interviews 2021

Stakeholders Field Interviews 2021

technical member(s) that the Committee deems fit". For most of the MMDAs, that was a grey area of opportunity to add district assembly officials to the committee as co-opted members, who eventually become permanent members of the DFMC which is in contradiction to the provisions of the guidelines on composition of the disability fund management committee.

Most DPOs including some assembly officials, were opposed to the deep involvement of some assembly officials in the disability fund management. Many of the stakeholders interviewed, felt DFMCs should be allowed by MMDAs to operate independently. According to DPOs "assembly officials who are not listed in the guidelines, must stay out of operations of the Fund management Committees ...ask Metropolitan, Municipal and District Chief Executives (MMDCEs) not to interfere and highjack the process". ²³

DPOs and fund managers together acknowledged that it is MMDAs' responsibility to create committees, yet they were worried that most coordinating directors have found themselves in there. However, in the views of a coordinating director, "I take exception to coordinating directors sitting on the disability fund management committees ... coordinating directors need not to be given space on the Fund Management Committee ...we may have the tendency to influence decisions as coordinating directors...we need to respect the structures in place and not to open the flood gates for abuse of office".

Most of the committees if not all, were dominated by the three traditional disability groups namely, people who are physically challenged, people who are blind (Visually impaired), people who are deaf (hearing impaired). Some groups' members such as the Ghana Stammering Association, Ghana Burns Survival Association and others were not recognised by some DPOs as persons with disabilities, and consciously and/or unconsciously excluded them. Those found worse off in terms of exclusion, were persons with mental health conditions. Persons with mental health conditions were either not recognised and/or considered even by DPOs as PWDS. In the words of one GFD regional chairman, "we did not recognised persons with mental health conditions were PWDs ...until learning recently...they have different needs and issues". ²⁴

Some MMDAs comparatively, had slightly larger DFMC membership, where there are strong presence and visibility of DPOs. For instance, in Assin South District Assembly all the 8 DPOs of GFD were represented on the DFMC, including the representation of organisations for persons with mental health conditions, namely, MEHSOG and Inclusion Ghana.

NCPD Visibility and Representation on DFMC

Evidence from the field suggests that the National Council for Persons with Disability (NCPD), the oversight actor entrusted with the key responsibility for disbursing and managing the disability fund for PWDs, was visibly missing on almost all DFMCs nationwide.

²³ Stakeholders Field Interviews 2021

²⁴ Stakeholders Field Interviews 2021

For disability representation and inclusion, NCPD was absent on the DFMCs. Findings reveal that visibly, there was the strong presence of GFD in all MMDAs visited and very limited representation or no presence of NCPD except in few MMDAs with proximity to the national capital, which came up during the stakeholder interview in GA East Municipal. Most DPOs lamented the absence of NCPD representations on the DFMCs across board.

According to stakeholders who were consulted during the field interviews, the absence of NCPD is largely due to the lack of decentralised structure of the Council. This makes it difficult to get NCPD represented on the disability fund management committees in all the MMDAs nationwide. Contrary to Article 49 (1) of the Disability Act 715, which states that "the Board may establish regional and district offices of the Council in each regional capital and in the districts" this has not happened after almost 15years since the passage of Persons with Disability Act in 2006.

Many of the stakeholders engaged during the field interviews assigned the challenges with the operational implementation largely to the absence of NCPD on the DFMCs. Some of the concerns were that committees are not privy to releases. According to PWDs, if NCPD was on the ground "MMDAs would implement the wishes of the PWDs and not felt needs of the Assembly". In one MMDA, this is what DFMC said: "as per the guidelines, we are to have a member of NCPD on the committee, the absence of the NCPD in the districts delays a number of things...persons with disabilities are not signatories to the Bank account for managing the DACF because persons with Disability are not (GoG) official of the Assembly and cannot be signatory to the bank".

No Gender Dimension

Despite the gender equality provisions in Ghana, particularly as enshrined in the 1992 Constitution, social and economic opportunities are highly unequal between men and women in Ghana. Clearly, the gender dimensions of disability have not been specifically recognised or given special provisions in the DACF disability fund disbursement and management. Although few MMDAs reported they made allocations and disbursements with gender considerations, most MMDAs spoken to were inconsiderate of the different gender needs, as well as the unique needs of women with disabilities.

Appointments to the DFMCs, were gender neutral and made no considerations in ensuring there is a quota for women's meaningful participation on the fund management committees. Almost all MMDAs made appointment based on the dictates of the guidelines, which obviously did not make any affirmative considerations in favour of gender considerations. Observably, there are generally few women in decision-making and/or senior management positions. Therefore, any efforts towards gender equity, in terms of fairness in composition of the DFMCs, may require affirmative action in achieving gender inclusion in implementation of the disability fund management.

²⁵ Stakeholders Field Interviews 2021

Mode of Disability Fund Application and Beneficiary Selection

There are varied differences in the mode of disability fund application. In some MMDAs, the DFMCs have developed fund application forms that require applicants to complete by filling or ticking applicable field and attach photographs. Other MMDAs do not have any application template and only request applicants to write an application letter and attach a passport picture to the written application. From the findings, mostly in MMDAs without application templates/forms, PWDs complained of the department of social welfare asking them to resend written applications, because the first did not meet a minimum pregualification standard. Again, DPOs complained that it was challenging for illiterate PWDs, who are unable to write and had to rely on using secretarial services of internet cafés, who often do not accurately type the right information as provided, which ends up not only costing them financially, but prolongs delays with their written application and submission. According to a DPO for instance "not all the GNAD members can write, most our caregivers cannot read nor write, and therefore cannot apply in writing ...we rely mostly on the interpreters ... without the interpreter we are unable to communicate to our parents/caregivers and the assembly to access information on mode of disability application".

The selection and vetting processes are key functional components of the guidelines for disbursing and managing the DACF fund for PWDs. Findings suggest that there are nationally no standardised criteria for beneficiary selection. The selection process differs from MMDA to MMDA and it was evident in all the districts visited.

The guidelines provide that "both groups and individuals shall have access to the fund, and that "individual PWDs who are not members of any OPWD can access funding from the DACF for any of the purposes". It is however silent on application and selection processes. It makes no provisions that directs the committee on beneficiary selection of the beneficiaries. According to stakeholders interviewed, "there is no specific guidance and/or clarity on the selection process".26 They indicated that "in some of the districts after the Social Welfare office receives the application and is vetted by the committee, social welfare can undertake verification on phone and make the necessary recommendation to the Coordinating Director through the social welfare Director for final approval. This is contrary to the provision which mandates the DFMC to "Vet and approve applications received from PWDs and OPWDs". This was corroborated during stakeholders' consultations, particularly in Bongo District Assembly that "there is interference and politicisation by the District/Municipal Chief Executives...in some cases, the District Chief Executive would insist on seeing the final list before request for disbursements are approved and made". 27 Their general assertions were that the discretionary verification, recommendation, and subsequent approval by the MMDAs, has given room for abuse of discretion by the disability fund management committees, leading to "infiltration of political party people on the lists of PWDs". 28

Criteria for setting the benefit threshold

Evidence from the MMDAs visited suggests that the threshold for the beneficiaries is determined by the DFMC. This is done in a manner that allows for large coverage of PWDs. Stakeholders indicated that because there is no provision in the guidelines on the setting of the threshold, it gives room for disparities in the threshold, and depending on the MMDA, PWDs could receive between GH¢2,000 to GH¢10,000, which was described substantial to cover the purchase of items such as maize grinding machine, tricycle with loading buckets ('ababayaa') and other simple mechanised tools/machines as well as food processing equipment for sustainable businesses.

Comparatively, some DPOs in some other MMDAs, mentioned their members receive funds ranging from as low as GH¢1,500 to GH¢2,000 and expressed concerns that "PWDs "do not get the requested funding support" and suggested preferably a one-time sustainable support for economic empowerment through income generating activities. DPOs who received relatively small amount of the funds, were of the view that the thinly spread nature of the fund, which most of them referred to as "sɔpi-sɔpi" disbursements, are not helpful in meeting the needs of beneficiaries.

Concerns were raised among PWDs themselves that there is currently no balance in the distribution of the fund among the different categories of PWDs. They expressed the view that some groups are not sufficiently captured and covered, and the disbursement of the fund is well disbursed but not proportional to the different disability groups. In Tamale Metropolitan Assembly this is what one key stakeholder remarked, "as far as I can remember, mentally ill and epileptic people have not benefitted from this fund disbursement at least in the last 4-5 years since I have been here". ³⁰

The 2017 Directive by the Common Fund Administrator

Following the 2017 new directive by the common fund administrator, the disability fund management has witnessed some operational implementation changes in recent times. According to persons with disabilities the new directive limits the scope of the areas of spending, contrary to the provisions in the guidelines. The new directive for instance, no longer makes provision for trainings and organisational development, and prescribes that assemblies must do the procurement on behalf of beneficiaries to support the livelihood empowerment of persons with disabilities. Persons with disabilities on the fund management committee complained about the inconsistencies with the guidelines and pointed to the loopholes in the new directive. They indicated that they do not participate in the process of the procurement. According to the disability representative organisations, "the centralised procurement is more discretional and does not consider the felt needs of PWDs which are often not met". For instance, in Oforikrom Municipal Assembly one of the representatives of a DPO, said, "a person was given a fridge but has no electricity in their house or business center to put the fridge to use". ³¹

²⁹ Literally mean 'piece meal or bit-by-bit or in pieces"

^{30,31} Stakeholders Field Interviews 2021

According to DPOs, the new directives authorise among others that "PWDs could not apply for funding support to build the capacity of OPWDs in the districts to enable them to advocate and assert their rights and undertake awareness raising and sensitisation on disability issues". Nationally, almost all MMDAs are operating based on the new 2017 directive, in contravention of the provisions in the DACF disability fund guidelines. Findings from the field also suggest that the new directive issued in 2017, presented some information and communication flaws, contrary to what had been the practice since the introduction of the guidelines in 2010. According to stakeholders, the practice had been that MMDAs were submitting annual DACF disability fund disbursement reports based on district level observations to the MoF and MLGRD after disbursements, but this has not happened since the new directive in 2017. Also copies of such reports are not given to persons with disability at the local level.

Whereas stakeholders unanimously agreed that funds had previously been abused and misapplied by some MMDAs and DFMCs in the name of capacity building and trainings, they also expressed concerns that the Common Fund Administrator issued the directive unilaterally, and that PWDs were not consulted on the new directives.

In addition to the above, another difficulty faced by beneficiaries is the lack of capital (cash) to start a business after receiving the livelihood empowerment support item - unlike the previous system when they were given cash and where the beneficiary would then use the fund to buy the item and use part as capital. Additionally, most beneficiaries complained about the high cost and inferior quality of most of the items supplied by the assemblies.

Transparency and Accountability issues

The main disappointments about the DACF disability fund disbursement, management and utilisation uncovered in the field was a lack of transparency and poor accountability. Stakeholders complained that most of the MMDAs visited were not accountable and transparent in the management of the fund to the DFMCs. Some of the committee stated that the MMDAs do not inform or provide any document stating the amount of funds that were received from the DACF Administrator. "Whenever we ask for the disbursement forms/sheets we don't get it from the DFMCs or the scheduled officer at the District Assembly", a representative of a DPO lamented during discussions in Bongo District Assembly. Some of the disability fund management committees stated that the MMDAs do not provide information on releases from the DACF Administrator. MMDAs just informs them verbally of the amount released without any documentations for verification of the exact amount. This situation, in the views of stakeholders, gives PWDs the impression that the assembly uses the funds for some other projects, and therefore requested to be signatories to the bank, which is against provisions in the guideline and the MMDAs financial governance practices. According to one coordinating director, "though PWDs may be wrong (due to lack of knowledge) in their request to be part of bank signatories, the frequent agitations for inclusion in the bank account signatories by PWDs is because the MMDAs are not transparent/open".

Evidence from the engagements suggest that there are generally inadequate financial management structures to ensure accountability and transparency in the management of the disability fund. The MMDAs, according to stakeholders, have no established mechanisms in place in the Assemblies to check, track and monitor how the disability funds are efficiently disbursed, managed, and utilised effectively.

Political Interference and Influence

Political interference and/or influence was uncovered as one of the major operational issues contributing to implementation setbacks. As established previously, this finding is also supported by documentary evidence from literature. Political influence, pressure and infiltration were largely mentioned across all the MMDAs visited. According to some stakeholders, particularly one MMDA high official, "there are hidden interests within the complex system and coordinating directors are not part of the decision of the Fund Management Committee but are often used on the DFMCs as conduit for political gains". 32

In Asunafo North, one stakeholder said during the discussions that "the selection and disbursement process lend itself to political manipulation and sometimes defeat the well-intentioned equity and poverty reduction considerations of the fund. This according to the stakeholder, "is evident by the insistence of some DCEs wanting to see and approve the final list of beneficiaries before disbursements are done". In Bongo district assembly, Ho and Sefwi Wiaso Municipal assemblies, DPOs lamented that "people qualify but do not pass through the selection and vetting process".

Multiple benefits

During the study, it was revealed that some of the PWDs receive multiple benefits either from the same MMDA or from a different Assembly. This presumably happens as a result of lack of due diligence by the DFMCs. DPOs complained that this is also possible because of political connections of some PWDs. The lack of proper vetting process by the committees and poor database on PWDs were among some of the other reasons stakeholders assigned to this problem.

Absence of group benefits

Even though according to the guidelines, the fund makes provision for group benefits, the findings suggest that this is largely non-existent. According to stakeholders, about 98% of disbursement of the fund had been given to individuals rather than groups. There were two isolated cases where PWDs applied for the fund as a group to undertake a group venture. In all the cases above, the venture undertaken by the group had been very successful and benefited the individual group members.

³² Stakeholders Field Interviews 2021

Inequity distribution of the Common Fund: The Urban Endowed versus The Rural Less Endowed

Significantly, one of the indicators for the DACF allocations is the IGF strength of the MMDAs. This is measured according to the ability to mobilise resources within the respective geographical area of each MMDA. So, the larger, the more urbanised the MMDA, the larger the percentage share of the DACF. Many have argued that this is not helpful, particularly for the disability fund which is a component of the DACF allocation to the MMDA. It rather deepens the rural -urban dimensions relating to unfairness or undeserved outcomes of vulnerability, and PWDs in particular. Due to the socio-economic inequities of the rural deprived communities, most rural MMDAs, are unable to generate high IGF. Using the IGF strength to determine the DACF percentage share, puts rural MMDAs at a disadvantage. This invariably makes rural PWDs become more vulnerable because the percentage share of disability fund allocated for disbursement is dependent on what MMDAs receive as DACF. One other key determinant for DACF allocation is the population factor, which also favours the urban MMDAs. Technically, it puts the support for urban MMDAs ahead of the rural assemblies.

According to stakeholders' "this is an important area of concern". They argued that advocacy for the 3% to be increased may be the right way to go, but not sufficient. In their views, the percentage share of the Disability Fund increases with increased DACF allocations and will serve good purpose if appropriate disbursements are made. In the words of one Co-ordinating Director, "1% of GHC10,000 is better than 10% of GHC100".

Such policy disparities create **social intervention inequities**, which is beyond the control of any MMDA and/or DPO. What can be done is a deliberate attempt to go against any such avoidable sharing format aimed at policies redressing socio-economic inequities between the rural and urban poor as well as vulnerable groups. These should be socially determined by circumstances and must be largely influenced by circumstances of disadvantaged people that limit their chances to live dignifying and healthier socio-economic lives.

Data capture and coverage

There is a glaring gap in data on persons with disability at the district levels, and generally in Ghana, which makes disabilities even less visible. The evidence from the field suggests both DPOs and MMDAs, generally had no or limited access to better data to inform efficient disbursement, management of the disability fund for PWDs for effective distribution to addressing their concerns. There is lack of disaggregated data by disability status and/or category.

Some of the MMDAs, amid the challenges with operational implementation of the DACF disability fund disbursement and management guidelines, present best and promising practices worth documenting. For instance, Bongo District, Ho Municipal and Assin South District assemblies in the Upper East Region, Volta and Central Regions respectively exhibited commendable fund disbursements and management that were captured for

documentary evidence of best and promising practices. There was evidence from the stakeholder interviews to suggest that these MMDAs have a strong fund management committee and largely demonstrated some level of adherence to provisions in the guidelines.

KEY LEARNINGS / INNOVATIONS

Case Studies

The evidence generation exercise uncovered several discrepancies in the disability fund disbursement and management. There was generally no uniformity in the application selection and approval processes as well as in the composition of the DFMCs across all the various districts visited along the northern and the southern divide nationally. Notwithstanding we found some best and promising practices of case studies worthy for documentation, learnings, and knowledge sharing.

Assin South versus Sefwi Waiso

The DMFC in this Assembly compared with other MMDAs, adopts a more systematic application process based on the principle of "First-Come-First-Serve". Once applications come in, they are compiled according to submission dates and areas of support needed. Based on categorisations and application vetting, the DFMC pay verification visits to the individual applicants, carry out social profiling and further needs assessment.

A report is put together by the visiting team with recommendations based on findings on various beneficiaries. The Social welfare director then puts a memo on the report and submits to the coordinating director who is considered as the spending officer for final approval.

This is in contrast for example to what happens in Sefwi Wiawso. Here, after the applications, the social welfare Director together with the members of the DFMC meet to select the beneficiaries. They do not engage the beneficiaries in determining the items to be purchased for them.

Applicant's Profiling and Selection - Assin South Versus Ho Municipality

The two assemblies comparatively have distinct differences in the DFMC composition. In the Assin South we observed that the composition did not follow strictly the provision in the guidelines. Included in the DFMC are officers who were not mentioned and as described in the guidelines.

However, in the Ho Municipal it was identified that the composition of the committee members confirms strictly to the provision in the guideline which includes a representative from the social services committee, social welfare director, a representative from GFD with the Assistant Director being a co-opted member. It was indicated that the Municipal Finance Officer, budget Officer as well as other officers are at times co-opted to participate in the meetings where their expertise is needed as per the stipulations in the guidelines.

Unlike in the Assin South District the composition of the committee in Ho Municipal Assembly included representatives of various DPOs, Social welfare, social services department, GFD, BAC, Assembly finance officer and co-opted procurement officer when 2017 directive was issued. The composition added a member from Business Advisory Centre of the Assembly with the Finance Officer being a permanent member of the committee rather than a co-opted member.

Group application/ Benefits versus Single Application – The Case of 'Asungtaaba' Group Support

Asungtaaba Group is a group of people with disabilities in the Bongo district in Upper East Region who have come together to work as a team. The group is made up of persons with different categories of disabilities. The group applied for the fund as a group to invest in their artisan business and got support from the fund. They have since been able to exhibit their different works based on their artisanal talents. The group produces basket, chairs, lie in chairs, beds, bags, hats, among others.

Each individual member of the group is comfortable, and they are able to take care of themselves and their families. A member of the group who participated in the focus group discussion is of the view that the group support is very helpful as it allows persons with disabilities who have common business plans or ideas to come together and work as a team and further create opportunity for learning and socialisation. She believes that the group support should be encouraged among persons with disabilities.

Standardised Application Format

Bongo, Sefwi Wiawso, Ho and Asunafo north assemblies provide some innovations for key learnings. In both MMDAs, they have developed standard simple application form³³ that is being used by persons with disability to apply for the disability fund with support from the management committee. It is a simple form that captures the name gender, type of disability, purpose of application and location of the applicant. For the fund management committee, the purpose is to aid persons with disabilities who may have difficulty in writing application letters. It also eases the burden of committee who will not have to read long application letters from persons with disabilities. The forms are kept with the district representations of the various member organisations of GFD to be made available for any persons with disabilities who want to apply. Such innovation addresses the challenges

	at all the Vic	
Contract of Contract	V. 5	
In case of reply, the Number and Date of this letter should be quoted		Office of the Municipal Assembly Post Office Box 25, Sefwi Wiawso.
Our Ref. No.:	(And Parks)	Western North Region.
	REPUBLIC OF GHANA	Date: 28th January, 2019
APPLICATION FORM FOR SUPPO	RT FROM DACF FOR PERSONS WITH	DISABILITIES (PWDs)
		DATE
IAME OF APPLICANT		
GE SEX MALE () FEMALE () TICK. OCCUPATI	ON
·	CONTACT	
IOME ADDRESS		
	PHYSICALLY CHALLENGE, MENTAL INTI	
IAVE YOU BEEN GIVEN THE FUND	BEFORE? YES () NO () IF YES, HO	W MANY TIMES (1) (2) (3) TICK
DRGANISATION GBU, GNAD, DEAI	F, ALBINO, NON MEMBERS	
APPLICATION: I WISH TO APPLY FO	R SUPPORT FROM THE DACF FOR PWD	s for Myself/ My Ward.
REA FOR SUPPORT:		
NCOME GENERATION (), EDUCAT	TION (), HEALTH (), ASSISTIVE DEVICE	E (), APPRENTICESHIP
DESCRIBE WHAT YOU WANT TO DO	OR USE THE MONEY FOR	
	Signatu	re/ Thumbprint
OTAL AMOUNT REQUESTED . GHC		
OTAL AMOUNT REQUESTED . GHC		

Figure 1: Template for DACF Application Template for Sefwi Waiwso District.

associated with written applications by PWDs, particularly those with little or no formal education. It also eliminates the issue of accessibility due to literacy barriers.

Both Ho Municipal and Assin South exhibited some levels of proactive support to Persons Mental Health Conditions and made routine follow ups with them to ensure adherence to medications among others. Particularly in Assin South, where there is no district hospital facility, we found this local-community level initiative as a welcoming model that could be harnessed further.

Percentage allocations to key spending areas: Case of Assin South Vs. Ho Municipal

Again, in both Ho municipal and Assin South district, stakeholders reported that they have assigned percentage to each of the spending areas as mentioned in the 2017 directives and made disbursements accordingly based on the allocations received. However, in Assin South, the DFMC continue to set aside a share of 20% for organisational development, contrary to the 2017 directive.

³³ See in annex for full view

In Ho Municipal Assembly, the DFMC, deducts and set aside 5% of the funds allocation they receive for administrative and management of the disability fund as per the guidelines. The 95% remainder is further disbursed proportionally according to the spending areas as outlined in the guidelines. The Assin South District Assembly on the other hand, calculate the disbursement percentages including administrative and management spending on the total sum as per the allocation they received.

Table 2: Comparative Percentage allocations to key spending areas

	PROPORTIONAL SHARE PER SPENDING AREA		
SPENDING AREAS	Assin South	Ho Municipal	
Livelihood Improvement Initiative	40	80	
Education and Training	25	10	
Health/Assistive Device	10	10	
Management and Administrative	5	5%	
Organizational Development	20	-	

SECTION FOUR: RECOMMENDATIONS AND CONCLUSIONS

The outcomes from the evidence generation exercise suggests that the 2010 DACF disability fund disbursement and management guidelines are no longer fit for purpose. The stakeholder consultations on the status of the implementation of the guidelines provide important evidence-based learnings. As uncovered, the evidence suggests several significant challenges that require redress to improve upon the situation. There is also evidence to suggest several useful opportunities informing the urgent need for review of the DACF disability fund disbursement and management guidelines. The review is important to ensure inclusiveness of the disability fund management, in alignment with UN Conventions and international disability protocols, and in compliance with Agenda 2030. The following key policy and implementation recommendations are therefore being suggested for consideration and action.

Policy Recommendations

For purposes of policy considerations, government and COS stakeholders need to:

Bring the evidence to bear on, and support review of the current guidelines

The views from the field, suggests urgent need to review the DACF disability fund guidelines, to capture new and emerging disability inclusion issues, and in alignment with UNCRPD Users, administrators, and managers of the disability fund unanimously were of the opinion that the guidelines do not sufficiently cover in detail the role of the user-led voice in disbursement and management, accountability, reporting, communication, monitoring and evaluation. Experiences from the DFMCs suggests the current guidelines are weak in many areas, particularly the underlisted, which give too much room for administrative discretion, that often does not benefit persons with disabilities.

- **A.** Nomination and selection of representatives unto the DFMC. The process for getting representatives onto the committee were found to be 'user-indifferent'. To ensure meaningful and productive disability inclusion requires clear and detailed provision on user-led inclusion in the fund disbursement and management. This has a great deal of potential to reduce, if not to eliminate, the levels of manipulations and interferences with disability fund disbursement and management.
- **B.** Reporting and feedback mechanisms. Clear reporting systems and information-flow and feedback mechanisms need to be succinctly captured in the disability guidelines to improve transparency and accountability.
- **C**. Gender Inclusion. This requires a clearly stated provision in a policy such as the disability fund guidelines to deliberately take gender issues, particularly, women and girls with disabilities, into consideration, at all the different stages and processes of the fund disbursement and management.

- **D.** The guidelines, if revised, should clearly define the roles and responsibility of each member of the fund management committee.
- **E.** Feedback and grievance mechanisms should be well outline in the guideline with proper tenure of office.
- **F.** GFD should have some procedures for choosing representatives to the fund management committee and removing reps from the committee.
- **G.** A revised guidelines should give clear process in allocating percentage to the various areas of support based on the district's needs.

Build on review process initiated by NCPD and GFD, and support revision of the guidelines.

This study found that NCPD in close working collaboration with GFD has since 2018, initiated proposed revisions to the disability fund guideline for consideration. In order not to reinvent the wheel, GFD should take on board the review of the guidelines, by building on the proposed draft revised document, and work together with NCPD, and incorporate emerging findings from this study to complete the revision and finalise a new DACF disability fund guideline for adoption and implementation.

Policy Advocacy

Beyond these policy recommendations as outline above, Ghana Somubi Dwumadie and working in close collaboration with donor partners could support:

- policy advocacy work with DPOs through GFD to help facilitate building on the process that started in 2018, to help put together the proposed revisions that are still in draft form and finalise more concretely, revised DACF disability fund management guidelines or Policy.
- GFD to advocate for the implementation of the policy on secondment of disability inclusion officers to all MMDAs or recruitment of disability inclusion officers for placement at all MMDAs as NCPD staffs.³⁴

Implementation Recommendations

The field findings suggest a number of operational implementation issues. These were not only setbacks to implementation but were found to be physical barriers to accessing the disability fund.

Strengthen and reform the fund management and administrative Structure

This study suggestively re-echoes other studies including (Naami A. 2015, Adamtey et.al 2018) that "decoupling the fund management from political structures will reduce political interference and involvement of political officials in the disbursement of funds for persons with disabilities. To achieve this, the government should consider revising the current structure that mandates MMDAs to receive and disburse funds as their organisation structure is prone to political interference.

SPer the Act that establishes NCPD, the Council is supposed to decentralise their structures, with approval to recruit for placement. Views from the field suggest there are challenges so the alternative options is to get OHLGS to second some of the officers as Disability Inclusion Officers at the MMDAs

Improve data and information on people with disabilities

Improved data is key in providing an empirical basis for the selection of beneficiaries, the quantum of benefits and frequency of accessibility, and elimination of political influence and interference. Having accurate data on the scale and scope of the types of disabilities, both physical and mental, is an important area for consideration at the different levels of disability fund utilization and coverage. The above should be done in addition to the provision of a standardize definition and classification of PWDs to ensure that it captures all the categories of disabilities. This classification should recognize persons with mental disabilities who are even homeless and make recommendation for their inclusion.

Timely Releases and Disbursements of the Disability Fund

To ensure desired impact of the disability fund, it is imperative to consider timely release and disbursement of the DACF disability allocation in line with the provisions in the guidelines. This will enable beneficiaries to receive the funds early for their planned activities.

Openness, Reporting and Information-flow

One key implementation challenge was the lack of openness and reporting. Information sharing is an essential part of accountability and transparency. At the national level, it is all-important for the Administrator of Common Fund to share information on the disbursement with GFD through NCPD for information flow through representative organisations to ensure transparency and make follow-up as well as feedback easy.

It is essential also at the district level for DFMCs to furnish DPOs with the disbursement summary sheets/forms after each disbursement at the MMDA level. This will enhance transparency and accountability of the disbursement of funds and, also give GFD and the regional representative the opportunity to feedback on issues that may arise.

Advocacy/awareness raising on the rights and responsibilities of Persons with Disability

Notably, one key area of funding and/or spending, yet we found it is either the underspent area or missing in the proportional share of fund allocation. Instead of prioritising this key funding area, most DFMCs focus on administrative and management spending. Interestingly, the 2017 directive worsened the situation by eliminating fund allocation for organisational development. Advocacy and awareness raising at the district-community level is essential for members of DPOs. Consider public education programmes specifically targeting caregivers of people with mental health conditions, leprosy, epilepsy, people who are deaf or blind to join the respective representative organisations. Community advocacy strategies can be used for constructive engagement between department of social welfare and PWDs on disability fund application, disbursement, and management processes.

This will provide increased opportunities for PWDs access to the fund. Not only that but it will also enhance understanding that individuals who are not members of any OPWD can also access disability funding for any intended purposes.

Disability Inclusion Training and Capacity Building

Consider disability inclusion capacity development training for social welfare officers, as well as the GFD representatives on the committee on user-led approaches to fund management.

Bridge rural-urban inequity gap

Adopt a social equity intervention devoid of widening social disparities but instead aimed at bridging social equity gaps. This calls for a deliberate attempt to go against any such avoidable sharing format aimed redressing socio-economic inequities between the rural and urban poor, vulnerable groups, particularly PWDs in deprived rural MMDAs. Such an intervention should be socially determined by circumstances and must be largely influenced by the unique needs of disadvantaged people with chances to live dignifying and healthier socio-economic lives.

Ensure compliance to the guidelines

It is important that reward and sanction measures are instituted against non-compliance that misappropriation and misapplication by MMDAs contrary to the provisions in the guidelines. This will help regularise the work of the DFMCs and hold officials of both the Department of Social Welfare and Community Development and the District Assembly accountable for enhanced transparency. MMDAs should not use the fund to finance funfairs during the distribution of items to PWDs.

Uniform Criteria for beneficiary Assessment and Profiling

The disability fund guideline as it is now, does not provide in detail processes for beneficiary profiling and assessments. Currently there are varied approaches to beneficiary assessments, depending on the MMDA, which largely gives room for political interference. It is therefore important to consider a uniform beneficiary assessment criterion for an informed beneficiaries' selection, tracking and monitoring. Beneficiaries of the fund should include Caregivers of persons with disabilities with some level of recognition to assistants and guides.

Standardise the Application Template/Form

The low number of disability fund beneficiaries could be linked to the inability of most people with disability to read and put into writing their application for submission. We found out that the MMDAs, where a standardised application form exists, tend to have relatively more persons with disability applying to access the fund. The availability of such a template also eliminated this cost involved in using third parties for secretarial services. This means any policy decision to nationally adopt a standardised application template or format will not only improve on the number of applicants, but also make it more easily accessible.

It is therefore important that revised guidelines consider a clear provision for a standardised application template form. Further provisions for disability accessible formats should be made, such as Braille or audio versions.

CONCLUSIONS

The District Assembly Common Fund (DACF) allocation for persons with disabilities was introduced as a social intervention to a) minimize poverty among all PWDs particularly those outside the formal sector of employment and help enhance their social image through dignified labour. The Disability Fund is a proportion of the DACF which is transferred from central government to the local governments for development on a quarterly basis. The Disability Fund has made some significant strides towards achieving its goal since its introduction in 2010.

Despite the existence of the fund for more than a decade, evidence shows that poverty is still widespread among persons with disabilities in Ghana. This study and several other studies have also shown that the fund implementation and management is marred with challenges which have affected fund utilisation and hampered its ability to achieve the intended objectives. Whereas the introduction of the guidelines in 2010 provided guidance for disbursement, management, and utilisation of the Disability Fund, it is not without operational implementation issues. Views from stakeholders and those gleaned from a number of available studies suggest the need for review of the 2010 guidelines for disbursement and management of the fund in order to address policy and operational gaps.

This report provides some concrete recommendations on how to address both policy and implementation gaps in alignment to a rights-based and user-led approaches, to make it more relevant and fit for the intended purposes.

Appendices

Appendix 1:

Literature Review: Disability Fund in Ghana

by

Ghana Somubi Dwumadie (Ghana Participation Programme)

April 2021

Executive summary

Article 252(2) of the 1992 Constitution of the Republic of Ghana requires the Parliament to annually allocate not less than 5% of central government's revenue to the local governments for development.³⁵ These funds are transferred to the District Assemblies Common Fund (DACF) on a quarterly basis to enable the Metropolitan, Municipal and District Assemblies (MMDAs) to undertake development initiatives within their respective jurisdictions. Of the amount given to the District Assemblies, each Assembly is required to allocate 3% of the funds to persons with disabilities within its jurisdiction. This is known as the Disability Fund or Disability Common Fund.

The Disability Fund was introduced in 2005 as a social protection policy aimed at reducing poverty among persons with disabilities, particularly those who do not have formal employment, and enhancing their social image through dignified labour. This is done through skills training, income generating activities, education of persons with disabilities, awareness raising on disability issues, organizational development for various Organisations of Persons with disabilities (OPWDs), and the provision of technical aids.³⁶

Persons with disabilities can access the fund either as individuals or through organized groups for those who are members of OPWDs. Although the Disability Fund is a one-off payment to persons with disabilities, beneficiaries are eligible for more if they can show proof of proper utilisation of what they were given. The overall management of the Disability Fund is managed under the 2010 NCPD guidelines.³⁷

However, despite the existence of the fund for over a decade, anecdotal evidence shows that poverty is still widespread among persons with disabilities in Ghana. Studies have also shown that the fund implementation and management is marred with challenges which have affected fund utilization and hampered its ability to achieve the intended objectives. In order to improve the effectiveness of this policy, there is a need to review the guidelines for disbursement and management of the fund in order to address any gaps.

The aim of this review was to examine and synthesize current literature available on the effectiveness of management of Disability fund in Ghana to inform a review of the Disability Fund guidelines. Literature was gathered from published research, peer reviewed journal articles and grey literature published in the last ten years.

³⁵ Parliament of the Republic of Ghana. The Constitution of the Republic of Ghana.; 1996

National Council on Persons with Disability. Guidelines for the Disbursement and Management of the District Assembly Common Fund for Persons with Disability.; 2010

³⁷ Ibid

³⁸ United Nations Department of Economic and Social Affairs. Disability and Development Report.; 2018

Adamtey R, Oduro CY, Braimah I. Implementation challenges of social protection policies in four districts in Ghana: The case of the District Assembly Common Fund meant for Persons with Disabilities. Legon Journal of the Humanities. 2018;29(1):26

1. Introduction

It is estimated that more than one billion people in the world today live with some form of disability.⁴⁰ Approximately 80% of these people live in developing countries.⁴¹ In Ghana, the 2010 population census estimated that 3% of Ghana's population (roughly 750,000 people) is made up of persons with disabilities.⁴²

Generally, persons with disabilities are more likely to experience poorer health, lower education achievements, fewer economic opportunities and higher rates of poverty than people without disabilities. This is largely due to numerous obstacles that prevent them from accessing services and opportunities available to people without disabilities. According to a study conducted by the Organisation of Economic Development (OECD) in 2009, in developed countries, persons with disabilities within the working-age bracket were twice as likely to be unemployed compared to their counterparts who were without disability. In cases where they were employed, the OECD study found that most persons with disabilities worked part time and received lower wages compared to the general populace. In Ghana, studies have found that persons with disabilities largely depend on family members and others for their daily bread as they lack a source of livelihood to fend for themselves.⁴⁴

The United Nations Development Programme (UNDP) recognises poverty as the lack of access to opportunity and violation of human dignity. Recognizing these challenges, in 2006 the UN Convention on the Rights of Persons with Disability (CRPD) was adopted in a bid to promote the civil, cultural, political, social and economic rights of persons with disabilities. The purpose of this international treaty is to promote, protect and ensure the full and equal enjoyment of all human rights and fundamental freedoms by all persons with disabilities, and to promote respect for their inherent dignity.

Apart from the UNCRPD, several international development programmes, such as the Sustainable Development Goals (SDGs), have also made provision for the protection of the rights and freedom of persons with disabilities. The principle of equal opportunity and the quest to reduce income inequalities among persons with disabilities creates the avenue for them to undertake any economic activity which they deem fit. ⁴⁶

⁴⁰ World Health Organization, World Bank. World Report on Disability.; 2011.

⁴¹ United Nations. Promoting Inclusion through Social Protection. Report on the World Social Situation.; 2018.

⁴² Ghana Statistical Service. 2010 Population and Housing Census Report.; 2013.

⁴³ OECD. Sickness, Disability and Work: Keeping on Track in the Economic Downturn.; 2009.

Opoku MP, Nketsia W, Agyei-Okyere E, Mprah WK. Extending social protection to persons with disabilities: Exploring the accessibility and the impact of the Disability Fund on the lives of persons with disabilities in Ghana. Glob Soc Policy. 2019;19(3):225-245; Naami A. Disability, gender, and employment relationships in Africa: The case of Ghana. African J Disabil. 2015;4(1).

United Nations. Convention on the Rights of Persons with disabilities (CRPD) | United Nations - Department of Economic and Social Affairs; 2009. Accessed March 22, 2021.

⁴⁶ Ibid

In 2012, Ghana ratified the UNCRPD affirming its commitment to respect the human rights of all its citizens, including those with disabilities.⁴⁷

Over the years, the government of Ghana has implemented a number of policy and programmatic interventions aimed at protecting the rights and improving the lives of persons with disabilities. One such intervention is the Disability Fund established in 2005.

The Disability Fund is a social protection programme aimed at alleviating poverty among persons with disabilities in Ghana, particularly those outside the formal sector of employment. Introduced in 2005, the fund is currently a 3% allocation of the District Assembly common Fund (DACF) transferred from the Central government to Metropolitan, Municipal and District Assemblies on a quarterly basis. The main purpose of the fund is to support income generating activities as a means of economic empowerment for persons with disabilities, provide educational support and build the capacity of disability organizations to enable them to advocate and assert their rights and undertake awareness raising and sensitization on disability issues.

The disbursement and overall management of the fund follows the National Council on Persons with Disability (NCPD) guidelines set out in 2010. The guidelines also spell out the various areas for support under the Disability Fund. These include income generating activities, provision of assistive devices and technical aids, educational support and strengthening of disabled people organisations, among others.

However, although these guidelines have been in place since 2010, evidence from the studies included in this review suggests that implementation has been challenging. This rapid review sought to synthesise the content of available studies regarding the effectiveness of management of the fund (success, challenges and proposed recommendations) to inform review of the Disability Fund guidelines.

⁴⁷ Human Rights watch. Ghana: Disability Rights Convention Ratified. August 22, 2012.

2. Methodology

For this review, studies were identified through various electronic databases. Reference lists of selected articles were also screened to identify any relevant articles that did not come up in the initial search. Programme reports and findings relevant to the subject were also reviewed.

2.1 Search strategy

Various electronic databases, mainly PubMed and Google Scholar, were searched to identify relevant articles from published research, peer reviewed journal articles and grey literature for this review. The key search terms used in the search are: Disability Fund; District Assembly Common Fund; DACF; Common Fund; Disability Common Fund.

2.2 Inclusion and exclusion criteria

The following inclusion criteria was used to select studies to be included in this review: (1) Research conducted in/on Ghana; (2) published in the last 10 years, in peer reviewed journals or as grey literature; and (3) on Disability Fund. Studies conducted on District Assembly Common Fund, DACF or Common Fund which did not have information on the Disability Fund were excluded from this review.

2.3 Study selection

The titles and abstracts of all articles identified in the search were screened to remove duplicates and select potential eligible studies based on the inclusion and exclusion criteria. The full texts of potentially eligible studies were then obtained, and the final selection for inclusion into the review conducted. Only studies that met the inclusion criteria were included in this review.

2.4 Data extraction and reporting

Key findings from the included studies were synthesised with a focus on the management of the Disability Fund (key stakeholders involved in the implementation, success and challenges). Any proposed recommendations outlined in the included studies were also noted and documented to inform a review of the Disability Fund guidelines.

2.5 Limitations/gaps in available evidence

Most of the studies included in this review were grey literature materials comprising thesis and programme reports. In addition, all the studies were either cross-sectional studies or qualitative studies with a limited scope in terms of study region. This might have affected the generalizability of the findings reported in the primary studies. For this review, all the studies that met the inclusion criteria were included regardless of the study design, methodology and type of literature – see Appendix 1.

In terms of the type of disability, most of the studies included in this review (12 out of 16 studies – excluding Ghana Somubi Dwumadie programme reports) did not focus on a specific type of disability. Of the remaining four studies, one was aimed to assess the impact of the disability fund on persons with visual impairment while the remaining three were primarily focused on people with physical disabilities. None of the studies focused on people with mental health conditions.

3. Key Findings

This section summarises the key findings around effectiveness of management of the Disability Fund with a focus on fund implementation, the successes and challenges so far as reported in the studies conducted over the past 10 years.

3.1 Fund implementation

As mentioned earlier, the Disability Fund is a proportion of the DACF which is transferred from the central government to the local governments for development on a quarterly basis. DACF is managed by the Office of the Common Fund Administrator at the central government level. At the local government level, the implementation and management of the Disability Fund lies with the Metropolitan, Municipal and District Assemblies (MMDAs). Each MMDA is expected to have a special committee, Disability Fund Management Committee (DFMC), which is oversees the fund disbursement process. The responsibilities of the DFMC include vetting and approving fund applications, monitoring the fund utilization and presenting quarterly reports on the management of the fund to District Assembly.

To ensure effective utilization of the fund, the NCPD in collaboration with the Ghana Federation for Disabled (GFD) under the authority of the Minister for Employment and Social Welfare, has provided guidelines on the disbursement and management of the DACF to persons with disabilities. According to these guidelines, each District must have a Disability Funds Management Committee (DFMC), made up of five members, that manages the fund. The DFMC should have a separate bank account to receive the fund, and the committee is expected to meet once in every quarter to decide how to allocate the funds for the quarter.

3.2 Successes

Over the years, the Disability Fund has made significant strides towards achieving its goal. The first milestone achieved was the establishment of the NCPD guidelines in 2010 to guide the fund disbursement and management. According to GFD, the guidelines "brought sanity and increased effectiveness in the process of management and utilization of the fund".

In accordance with the said guidelines, MMDAs have established Fund Management Committees to oversee implementation of the funds in their respective districts. The committees are made up of NCPD representative, Social services sub-committee, Department of Social Welfare, District GFD representative and a co-opted technical member(s) selected by the committee. According to three of the 16 studies included in this review, the diverse composition of the committee ensures that the views and interests of

⁴⁸ MyJoyOnline.com. Federation of Disability displeased with new common funds distribution process. Published online April 30, 2018.

different stakeholders, especially those of the persons with disabilities, are well represented in the decision-making process.⁴⁹

In terms of actual fund utilisation and impact, evidence from some studies included in this review reported that, to some extent, the Disability Fund has helped to improve the lives of the beneficiaries in various ways. According to Edusei et al (2018), and Abrokwah (2018), the Disability Fund has been used to create awareness of disability issues, fund self-help groups and Disabled People Organizations (DPOs), for disabled people and improve persons with disabilities access to basic needs such as health care and education. According to a report by Ghana Somubi Dwumadie, the fund has improved financial sustainability for self-help groups and DPOs by providing a somewhat reliable source of funds for their operations.

In a number of studies, beneficiaries reported having used the funds to train themselves in employable skills and to engage in income generation activities such as farming and small business, as well as pay school fees for their children and assisted them in purchasing assistive devices.⁵⁴ Overall, the Disability Fund has been source of livelihood for the beneficiaries, especially those who are unemployed.⁵⁵

In addition, evidence has shown that the direct impact of social grants such as the Disability Fund is not limited to their direct pocket expenditure but extends to other people.⁵⁶ This is especially so in the extended family system in Ghana where individuals may depend on other family members for support. In fact, some persons with disabilities are breadwinners of their extended family members in Ghana.⁵⁷ This means that the benefits of the fund impact the lives of other people beyond those of the beneficiaries.

Adjei-Domfeh P. Management of the Disability Common Fund: Challenges and Impact on the Lives of Persons with disabilities in Kumasi Metropolis of Ghana.; 2015.; Agboga SR. The Contributions of the Districts Disability Common Fund to the Well-Being of Beneficiaries in Ada East District. Published online 2015.; Darkwah EA, Dennis Nii Ayeh Mensah, Evans Opoku Mensah. An Evaluation of the Impact of District Assembly Common Fund for the Disable: A Study of the Asuogyaman District. Dev Ctry Stud. 2019;9(1).

Opoku MP, Nketsia W, Agyei-Okyere E, Mprah WK. Extending social protection to persons with disabilities: Exploring the accessibility and the impact of the Disability Fund on the lives of persons with disabilities in Ghana. Glob Soc Policy. 2019;19(3):225-245.

Edusei A, Adjei-Domfeh P, Mprah WK, Opoku M, Badu E, Appiah SC. Assessing the Impact and Uses of the Disability Common Fund Among Persons with disabilities in Kumasi Metropolis in Ghana | Review of Disability Studies: An International Journal. Rev Disabil Stud An Int J. 2018;12(4):14.

⁵² Abrokwah R. Accessing Healthcare in Ghana: Challenges of and Strategies Adopted by Persons with Physical Disability in the Accra Metropolis. Published online 2018. Accessed March 24, 2021.

⁵³ Ghana Somubi Dwumadie. Mapping of Self-Help Groups and Disabled People's Organisations. 2020

Adjei-Domfeh P. Management of the Disability Common Fund: Challenges and Impact on the Lives of Persons with disabilities in Kumasi Metropolis of Ghana.; 2015.

⁵⁵ Enoch A, Edusei AK, Paul O, Mensah AK, Adjei RO, Appiah-Brempong E. "We are not getting jobs": Job seeking problems of people with disability and coping strategies adopted in an urban traditional community in Ghana. Disabil CBR Incl Dev. 2016;27(1):109-125.

Darkwah EA, Dennis Nii Ayeh Mensah, Evans Opoku Mensah. An Evaluation of the Impact of District Assembly Common Fund for the Disable: A Study of the Asuogyaman District. Dev Ctry Stud. 2019;9(1).

Naami A, Liese H. The impact of unemployment on women with physical disabilities in Tamale, Ghana - ProQuest. Int J Divers Organ Communities Nations. 2012;2(11):117-128.

3.3 Challenges

Despite having registered a number of successes, the implementation of disability Fund has had many challenges. These challenges are grouped and summarized in broad categories as below.

Failure to comply with the implementation guidelines

One of the main challenges affecting the implementation of Disability Fund is lack of compliance with the implementation of the guidelines by the District Assemblies. According to the Ghana Federation for Disabled (GFD), the MMDAs who are charged with the overall responsibility of implementing the fund do not accept the NCPD guidelines and therefore, they do not follow them.⁵⁸ As a result, there have been reports of unethical dealings by the fund controllers ranging from corruption to discrimination in the way the funds are allocated to the beneficiaries.⁵⁹

This lack of compliance is evident in the way the MMDAs and DFMCs administer and manage the fund. Although the guidelines specify that allocations should be made in line with the various objectives, a study by Adamtey et al (2018) found that some of the Assemblies did not strictly comply with the guidelines and made allocations to persons with disabilities without stating the purpose. According to the study, there were instances where MMDAs made a fixed allocation to multiple beneficiaries regardless of the different purposes that the persons with disabilities had requested funds for. In some cases, the same activities were indicated as reasons for requesting the support and yet the amounts given varied, while in other instances, allocations were made with 'no purpose' stated which is against the NCPD guidelines. This brings into question the allocation criteria used to allocate funds to the different beneficiaries.

Still on the guidelines, although the DFMC are charged with the responsibility of monitoring and supervising fund utilisation, several studies found that the committees do not do any follow ups to check whether beneficiaries have properly utilised the allocated funds.⁶⁰ As a result, some beneficiaries end up not using the funds for the intended purposes, especially when the allocated funds are less than what they had requested.

This failure by MMDAs to comply with the NCPD guidelines has been compounded by some gaps in the guidelines themselves. First, the guidelines do not stipulate any penalties for MMDAs who violate the policy. According to Dasmani (2014), the NCPD guidelines for the disbursement and management of the Disability Fund have no sanctions for assembly officials who flout the guidelines or mismanage the fund. As such, the MMDAs often violate

⁵⁸ Adjei N. Putting decision into action: The Disability Act of Ghana. Six years down the line. undefined. Published online 2013.

Dasmani L. Ghana's Disabled Fund Managers Violate Guidelines | Features | Peacefmonline.com. peacefmonline.com. Published November 26, 2014.

Adamtey R, Oduro CY, Braimah I. Implementation challenges of social protection policies in four districts in Ghana: The case of the District Assembly Common Fund meant for Persons with disabilities. Legon J Humanit. 2018;29(1):26.; Okrah M. The Control Mechanisms for Effective Disbursement and Utilization of the District Assembly's Common Fund in the Karaga District of Northern Ghana. Br J Econ Manag Trade. 2016;11(4):1-15

the rules by withholding funds, allocating funds discriminately and even misappropriating the funds, leaving potential beneficiaries without access to the funds that should be available to support them.

Further, although the guidelines require every MMDA to establish a representative committee, a report by SEND Ghana (2014)⁶¹ found that in most of the districts, there is no NCPD representative in the DFMC to monitor the policy implementation. The guidelines also allow the committees to co-opt an unspecified number of members with special skills as the committee prefers. This gap in the guidelines has been misused by some committees which recruit more people than necessary thereby putting a strain on the limited resources available due to high management costs and allowances.

Lastly, the NCPD guidelines lack an empirical basis for the selection of beneficiaries, the quantum of benefits and frequency of accessibility, which are being determined by political actors. Currently, the funds are disbursed based on the need, number of applicants and availability of funds and whilst this might appear as a transparent and equitable process, it leaves room for political interference, discrimination and fund misappropriation. In practice, the beneficiaries seem to be selected based on individual's ability to perform some daily duties, type, budget, and sustainability of any planned income generating activity. This further creates barriers for people with disabilities, especially those with mental health disabilities who cannot perform these tasks.

Lack of access to the fund

Despite having been in existence for over a decade, many studies included in this review reported that only few persons with disabilities have been able to access the Disability Fund.⁶⁵ In a recent study by Opoku et al (2019), many persons with disabilities interviewed stated that they had applied for the grant several times but had not been successful. In addition to the low number of beneficiaries, a study by Adamtey et al (2018) found that the geographical coverage of the fund was limited as many of the beneficiaries were from the major towns and the district capitals. In this case, many persons with disabilities living in rural settlements and villages remote from the district capitals did not have access to the fund as most were not even aware that the fund existed.

⁶¹ SEND Ghana. Making Two Percent of DACF Work for Persons with Disability – SEND West Africa – Ghana.; 2014.

Ashiabi EE, Avea AP. The Absence of a Disability Measurement System in the Disbursement of the District Assembly Common Fund for Persons with disabilities in Ghana: How the Most Vulnerable are Denied Access. Rev Disabil Stud An Int J. 2019;15(4).

Ghana Somubi Dwumadie. District Level Mental Health and Disability Plans in Ghana. 2020

⁶³ Ibic

Ocran J. Disability and Stigma: Interrogating Middle-Class Experiences in the Social Spaces of Ghana.; Adjei Amoako Y. Promoting inclusive development in Ghana: disabled people's and other stakeholders' perspectives. Dev Pract. 2016;26(7):865-875.; Boamah DB. Examining Interventions in Ghana towards Protecting the Human Rights of Persons with Physical Disabilities. Published online 2019. Accessed March 22, 2021.; Arkorful VE, Anokye R, Basiru I, Hammond A, Mohammed S, Micah VB. Social Protection Policy or a Political Largesse: Disability Fund Efficacy Assessment and Roadblocks to Sustainable Development Goals. Int J Public Adm. 2020;43(15):1271-1281..

According to a report by SEND Ghana (2010),⁶⁶ out of the districts that are aware of the existence of the 3% DACF, only a third of people with disabilities in these districts know how to access it. Similar findings were reported in another study by Boamah (2019)⁶⁷ which found that some persons with physical disabilities do not even know about the fund or how to access it. This shows a major information gap on the availability of the fund and how to access it. Although the NCPD guidelines stipulate that DFMC's should sensitize all relevant stakeholders, including persons with disabilities and OPWDs at the District level, none of the studies included in this review found evidence of such sensitization efforts.

In fact, some studies have reported that some MMDAs deliberately withhold information about the fund from the potential beneficiaries. In Opoku et al (2019), it was reported that MMDAs tend to conceal information about the application process and modality for assigning grants to beneficiaries. The study also reported that there is a lack of disclosure about the amount of money released from the central government to the MMDAs (based on which the 3% reserved for persons with disabilities is calculated). This denies the OPWDs the opportunity to know or query the amount which is supposed to be disbursed to their members.

Other studies have reported that District Assembly officials tend to hold the funds meant for persons with disabilities in secrecy and fail to disclose information on the bank accounts and statement of accounts to the beneficiaries or the Fund Management Committee members. This lack of transparency and accountability not only affects the fund accessibility for potential beneficiaries, but it also encourages corruption and fund mismanagement.

Delays in funds release

The other major challenge associated with the Disability Fund is persistent delay in the release of funds. Although the grant is supposed to be disbursed quarterly, some beneficiaries have claimed that it took years before they received the grant. In a study by Edusei et al (2018), all the persons with disabilities interviewed indicated that they had either experienced delays in funds release or had not received the funds at all. Similar findings were reported in a study by SEND Ghana (2010) where beneficiaries of the fund reported having had to wait for a long time before receiving their share of the fund.

According to a study conducted by Ghana Somubi Dwumadie programme on the status of self-help groups and DPOs, although MMDAs should disburse funds to beneficiaries on a quarterly basis in line with the NCPD guidelines, most MMDAs do not do so until there is pressure from DPOs and self-help groups to release these funds. Another study in community-based rehabilitation initiatives also reported that the 3% of DACF is not always made available for the use by those it is intended to benefit, especially people with mental

SEND Ghana. Making Decentralisation Work for the Poor – SEND West Africa – Ghana. Published 2010. Accessed March 25, 2021.

Boamah DB. Examining Interventions in Ghana towards Protecting the Human Rights of Persons with Physical Disabilities. Published online 2019. Accessed March 22, 2021.

health disabilities.⁶⁸ These delays in the disbursement makes planning difficult thereby affecting fund utilisation.

Although the delays have been mainly attributed to poor fund administration and lack of compliance by the MMDAs, some studies have reported that the delays could also be as a result of irregular disbursement of DACF by the central government to the local governments. According to Ocran (2017),⁶⁹ funds are often not released on time by the Central Government and when released, the intervals at which government releases money to the MMDAs keeps changing. Another study by Enoch et al (2016) reported that funds for programmes such as Livelihood Empowerment Against Poverty (LEAP) and DACF had not been released for close to 2 years. This makes it difficult for the MMDAs to plan and allocate the 3% meant for persons with disabilities.

Due to the irregular and delayed fund release by the central government, some studies have reported that most MMDAs do not prioritize the needs of persons with disabilities and tend to allocate funds to other projects in the district before allocating the 3% to persons with disabilities. According to a study by Adamtey et al (2018), some District Assemblies use the funds meant for persons with disabilities for emergency situations and later make the resources available to be disbursed to beneficiaries, thereby leading to delays.

Insufficient funds

Besides lack of access to the funds and delays in funds release, many studies have reported that the amount of funds allocated to beneficiaries are often inadequate to meet the intended purpose. According to Edusei et al (2018) and Okrah (2016),⁷¹ some beneficiaries of the Disability Fund have reported that were given little or fixed amounts, regardless of their needs, which made it difficult for them to invest the money in meaningful ventures.

In this case, although the fund has the potential to mitigate the cost of living of the beneficiaries, most beneficiaries are unable to invest the funds in activities that would have any meaningful impact. According to Adamtey et al (2018), over 80% of the people who receive funds from the DACF are not given the full amounts they need to enable them to achieve the purposes for which the funds were requested. This hinders their ability to undertake the planned income generating activities and, in some cases, the beneficiaries end up using the funds in other ways. This finding is also consistent with other studies elsewhere which found that disability grants, especially in developing countries, are

Ghana Somubi Dwumadie. Community Based Rehabilitation Initiatives for Mental Health and Disability in Ghana. 2020.

Ocran J. Disability and Stigma: Interrogating Middle-Class Experiences in the Social Spaces of Ghana. Published online 2017.

Adjei-Amoako Y. Promoting inclusive development in Ghana: disabled people's and other stakeholders' perspectives. Dev Pract. 2016;26(7):865-875.

Okrah M. The Control Mechanisms for Effective Disbursement and Utilization of the District Assembly's Common Fund in the Karaga District of Northern Ghana. Br J Econ Manag Trade. 2016;11(4):1-15.

inadequate to match the large number of applicants and so individual allocations are too small to significantly reduce poverty among persons with disabilities.⁷²

The issue of insufficient funds has been aggregated by the current hard economic times in the country and the ongoing Covid-19 pandemic. In a recent study by Tsiboe (2020), several persons with disabilities reported that although the Disability Fund has helped them buy food stuffs and personal items, it has not in any way helped to lessen their economic burden since the funds are too little to be invested in meaningful income generating activities. The participants in the study added that, the funds allocated are not adequate even for basic needs as some traders have taken advantage of the pandemic to increase prices of commodities substantially.

The insufficient funds allocated to the beneficiaries may imply that the 3% DACF allocation to Disability Fund is not adequate to cover the huge need based on the number of persons with disabilities in each district. Worse still, part of the 3% DACF allocation is used to pay the sitting allowance for the fund managers and cater for fund management costs. Although this is in line with the NCPD guidelines, it reduces the funds available to be shared among beneficiary groups and individuals even more.

Political interference

Although the NCPDs Guidelines are operational, the disbursement and management of the Disability Fund has been saddled with opacity and partisan politics.⁷⁴ MMDAs are presumed to be too political because, according to their organisational structure, they are governed by political government appointees who may pander to the political ideologies of a certain political party. Therefore, until the decoupling of the fund from the political entities is ensured, political influences are likely to fester.

According to a study by Ashiabi & Avea (2019), fund allocation and disbursement process is impeded by district political heads such as Metropolitan, Municipal and District Chief Executives (MMDCEs) who use the to organize press conferences during disbursement, especially in election years, in order to gain political mileage. According to GFD, some District Chief Executives try to dictate to the DFMCs on who should benefit from the Disability Fund and how funds will be disbursed to the beneficiaries. In addition, some MMDAs use funds meant for persons with disabilities to satisfy the patron-client networks of local political heads of districts for personal gains.

Gooding K, Marriot A. Including persons with disabilities in social cash transfer programmes in developing countries. J Int Dev. 2009;21(5):685-698.

Tsiboe AK. Describing the experiences of older persons with visual impairments during COVID-19 in rural Ghana. J Adult Prot. 2020;22(6):371-383.

Arkorful VE, Anokye R, Basiru I, Hammond A, Mohammed S, Micah VB. Social Protection Policy or a Political Largesse: Disability Fund Efficacy Assessment and Roadblocks to Sustainable Development Goals. Int J Public Adm. 2020;43(15):1271-1281.

Ashiabi EE, Avea AP. The Absence of a Disability Measurement System in the Disbursement of the District Assembly Common Fund for Persons with disabilities in Ghana: How the Most Vulnerable are Denied Access. Rev Disabil Stud An Int J. 2019;15(4).

A good example of this political interference is the directive issued by the Office of the Common Fund Administrator in 2017 instructing that all MMDAs should exclude farmers, traders, babies, students, persons under 18 and above 60 with disabilities from the list of potential beneficiaries, contrary to the 2010 NCPD guidelines. Such decisions taken political class without wider consultations with the key stakeholders in the disability community are detrimental to effective implementation of the policy.

Other challenges

Other challenges associated with the Disability Fund include lack of data on the prevalence and rate of disability and PWD population in the country. This which makes it difficult to estimate the sufficient allocation needed for the Disability Fund and monitor the number of persons with disabilities who have benefited from the fund.

Institutional barriers relating to complicated application procedures that persons with disabilities have to follow in order to receive formal support from the fund have also been reported as some of the barriers to effective utilization of the Disability Fund. According to a study by Esaaba (2019),⁷⁶ the process of accessing the fund is cumbersome and has compelled some persons with disabilities to give up on accessing support.

Esaaba E. Challenges of Inclusion: Local Support Systems and Social Service Arrangements for Persons with disabilities in Suhum, Ghana; Baseline Study Report. University of Ghana - Department of Social Work; 2019.

4. Conclusion

The ultimate goal of the Disability Fund is to reduce poverty among persons with disabilities, especially among those without employment in the formal sector, by offering beneficiaries the opportunity to engage in economic activities. So far, the fund has contributed positively to improved livelihoods for some persons with disabilities by creating employment for the beneficiaries as well as improve access to basic needs such as health care and education. However, this has not been without its share of challenges.

Some of the key challenges reported in the studies included in this review include lack of compliance to the guideline, poor access to the fund, delayed disbursements both at the central and local government levels, insufficient fund allocations, lack of compliance to the guideline and political interference in the disbursement and use of funds among others.

Although the fund is a good social protection strategy for persons with disabilities in Ghana, it is unlikely that the policy can contribute towards improving the lives of persons with disabilities as long as the issues identified in this study remain unresolved. The policy impact will be inadequate unless the implementation arrangements are made effective. Once this is done, the aims of the Disability Fund might be achieved and the social image of persons with disabilities can be enhanced as envisaged by the policy.

As mentioned earlier, three of the 16 studies included in this review had people with physical disabilities as the study participants while one had persons with visual impairment as the primary study subjects. Further, one study reported that, people with visual impairment were more likely to access the fund compared to those with other forms of impairment. However, the challenges reported in these four studies were similar to those reported in the other 12 studies which did not focus on people with a particular type of disability. In this case, none of the studies included in this review singled out any challenges specific to a particular disability and/or mental health.

4. Recommendations

Several recommendations have been made in the studies included in this review to address some of the challenges highlighted above. These recommendations are summarized in two broad categories: recommendations for policy review and other recommendations.

5.1 Recommendations for policy review

The introduction of the guidelines in 2010 brought the much-needed guidance for proper management and utilisation of the Disability Fund. However, as noted in this review, there are gaps in the guidelines that need to be addressed in order to ensure the DACF aligns to a rights-based approach and more easily fits within the general social protection framework.⁷⁷ This can be achieved through:

- 1. Development of a social policy-oriented disability measurement system which will be used to identify persons with disabilities in need of one-time support and those who require regular support in order to inform selection of beneficiaries and disbursement policy. Such a system will promote fairness in allocation of funds.
- 2. Strengthen and reform the fund management and administrative structure by decoupling the fund management from political structures to reduce political interference and involvement of political officials in the disbursement of funds for persons with disabilities. To achieve this, the government should consider revising the current structure that mandates MMDAs to receive and disburse funds as their organisation structure is prone to political interference. Instead, existing non-political structures, such as the disability council, should be tasked to handle disbursements in order to improve transparency and increase fund accessibility for the beneficiaries.
- through regular monitoring of how the funds have been allocated and utilised. For the effective monitoring and evaluation of the impact of the DACF on persons with disabilities and to understand how the District Assemblies are faring, there might be a need to engage external independent evaluators to periodically undertake this exercise. This will compel the

Ghana Somubi Dwumadie. Landscaping Analysis of Mental Health and Disability Inclusive Policies, Plans, Strategies, Services and Programmes. Program Rep. Published online 2020.

Naami A. Disability, gender, and employment relationships in Africa: The case of Ghana. African J Disabil. 2015;4(1); Adamtey R, Oduro CY, Braimah I. Implementation challenges of social protection policies in four districts in Ghana: The case of the District Assembly Common Fund meant for Persons with disabilities. Legon J Humanit. 2018;29(1):26.; SEND Ghana. Making Two Percent of DACF Work for Persons with Disability – SEND West Africa – Ghana.; 2014.

Adamtey R, Oduro CY, Braimah I. Implementation challenges of social protection policies in four districts in Ghana: The case of the District Assembly Common Fund meant for Persons with disabilities. Legon J Humanit. 2018;29(1):26.; Adjei-Domfeh P. Management of the Disability Common Fund: Challenges and Impact on the Lives of Persons with disabilities in Kumasi Metropolis of Ghana.; 2015.

MMDAs to be more accountable as well as provide a more balanced account on the fund performance for improvement. Further, the Ministry of Finance should release documents on revenue released to MMDAs to relevant stakeholders as per the guidelines in order for them to be aware of the grant amount and the intervals at which the 3% quota for persons with disabilities are transferred.

Some researchers have also recommended that the central government, through the Ministry of Finance, should consider transferring the cash directly to persons with disabilities instead of disbursing funds through the local governments. One way to achieve this is by outsourcing the payment delivery services to a financial service provider such as a bank or mobile phone operator to disburse the funds to selected beneficiaries. This, according to Barrett and Kidd (2015), will enable the funds to get to beneficiaries on time, ensure transparency and dispel fears of embezzlement of funds by the local administrators. It will also help prevent unnecessary bureaucratisation and administration costs incurred at different levels.

- 4. Ensure timely disbursement of funds The central government should ensure timely quarterly disbursement of funds to the local governments to facilitate timely release of the 3% DACF allocation for persons with disabilities. Further, there is a need to review the allocation, and possibly increase the allocation from 3% to 5% to ensure that the amount allocated to each beneficiary is substantial enough to invest in something meaningful. 82
- 5. Provide reliefs for persons with disabilities-owned businesses the government should consider extending some kind of relief in terms of payment of utility bills to businesses owned by persons with disabilities. For example, monthly quota on electricity and water could be provided to all business which are started using seed capital from the fund. This will help promote effectiveness and efficiency in the social protection policy.
- 6. Ensure compliance to the guidelines. To ensure compliance, punitive measures should be instituted against non-compliant MMDAs that misappropriate or misdirect allocated funds contrary to the guidelines. This way, the work of the DFMC, officials of both the Department of Social Welfare and Community Development and the District Assembly will be made easier, less complicated and more transparent.

Barret S, Kidd S. The Design and Management of Cash Transfer Programmes: An Overview | Socialprotection.Org. 3rd ed. (German Development Bank K, ed.). KfW Development Bank; 2015.

⁸¹ Ibid

Naami A. Disability, gender, and employment relationships in Africa: The case of Ghana. African J Disabil. 2015;4(1).; Edusei A, Adjei-Domfeh P, Mprah WK, Opoku M, Badu E, Appiah SC. Assessing the Impact and Uses of the Disability Common Fund Among Persons with disabilities in Kumasi Metropolis in Ghana | Review of Disability Studies: An International Journal. Rev Disabil Stud An Int J. 2018;12(4):14.

5.2 Other recommendations

- 1. Develop a database of all persons with disabilities at the district level to address the lack of data for planning and monitoring, several studies have recommended the development of a national database for persons with disabilities. The database should capture critical information on all persons with disabilities including the categories/forms of disability, demographic information, socioeconomic status, among others. Having such data would help enhance and ease identification of people living with disability who need support and inform social policies targeted at persons with disabilities. It would also help improve fund coverage as well as ensure that the support goes to those who really need it.
- 2. Ensure accurate data capturing and recording in all districts there is need to develop a template for use by all MMDAs to record all allocations of the District Assembly Common Fund made to beneficiaries. This template can also be used for tracking, monitoring and evaluation and reporting. It will also aid in monitoring at the national level and to evaluate the utilisation of the fund. To further yield positive results and improve transparency, the MMDAs should be given basic training of expected mode of recording fund allocation at the district level.
- 3. Mobilise persons with disabilities into organised groups for support. According to Adamtey et al (2018), persons with disabilities should be encouraged to organise themselves into groups and supported to engage in productive businesses that have the potential to yield multiplier effects on other persons with disabilities. This will help address the challenge of insufficient funds as the limited funds available can be pooled together to make a substantial investment instead of each beneficiary investing a small amount separately. In addition, these groups should be offered entrepreneurial training to equip them with management and financial literacy skills that would help them manage small and medium scale economic activities appropriately. Continuous support in terms of regular monitoring should also be provided to ensure that the groups manage and sustain economic ventures successful. This would not only increase the chances of having a productive business benefiting more people but would also serve as an opportunity for groups to support one another and strengthen social capital among persons with disabilities.
- **4. To enhance impact and promote sustainability,** all beneficiaries who receive seed support to start businesses should be encouraged to employ other persons with disabilities as apprentices and train them in order to ensure the multiplier effect of

Adamtey R, Oduro CY, Braimah I. Implementation challenges of social protection policies in four districts in Ghana: The case of the District Assembly Common Fund meant for Persons with disabilities. Legon J Humanit. 2018;29(1):26.; Ashiabi EE, Avea AP. The Absence of a Disability Measurement System in the Disbursement of the District Assembly Common Fund for Persons with disabilities in Ghana: How the Most Vulnerable are Denied Access. Rev Disabil Stud An Int J. 2019;15(4).; Arkorful VE, Anokye R, Basiru I, Hammond A, Mohammed S, Micah VB. Social Protection Policy or a Political Largesse: Disability Fund Efficacy Assessment and Roadblocks to Sustainable Development Goals. Int J Public Adm. 2020;43(15):1271-1281. doi:10.1080/01900692.2019.1669048.; Esaaba E. Challenges of Inclusion: Local Support Systems and Social Service Arrangements for Persons with disabilities in Suhum, Ghana; Baseline Study Report. University of Ghana - Department of Social Work; 2019.

- the fund allocation. Beneficiaries should also be encouraged to make future contributions back to the Disability Fund to make it more sustainable.
- 5. To minimise misapplication of the funds by beneficiaries, some studies have recommended that the MMDAs, together with their Departments of Social Welfare and OPWDs should consider providing support in the form of kits, equipment and inputs instead of cash transfers, where possible. This recommendation was somewhat implemented in 2017 when the government restructured the fund directing that beneficiaries be provided with items that will aid in their pursuit to financial freedom instead of the previous monies handed to them. However, a study by Darkwah et al (2019) found that, although the new structure is more appreciated and likely to socio-economic and financial freedom for persons with disabilities, challenges were still inherent. The researchers therefore recommended the development of a well structured system for distributing items to the beneficiaries to address issues of delays, inequitable access and non-compliance to the guidelines.
- Explore alternative policy and programme initiatives to improve the socioeconomic status of persons with disabilities. Although the Disability Fund has been useful to those who have benefitted so far, some researchers feel that the impact is too low and therefore suggest that the government should consider investing in other initiatives, instead of the one-time cash transfers. Considering the reported failure rate in setting up and managing small income-generating ventures, some researchers suggested that the government should consider creating employment opportunities targeted towards persons with disabilities. Also, persons with disabilities should be considered in the existing national youth employment modules targeted at reducing unemployment. Similar views were expressed in a study by Agboga (2015)84 where most of the persons with disabilities interviewed recommended that the government should use the funds to establish industries in the districts and employ persons with disabilities instead of giving cash transfers. This will ensure monthly and regular incomes for persons with disabilities instead of the DACF which has not been able to meet the needs of the beneficiaries. In this case, the Disability Fund can be used to provide education and vocational training opportunities for persons with disabilities to make them eligible for employment so that they can fend for themselves instead of relying on handouts.85

Agboga SR. The Contributions of the Districts Disability Common Fund to the Well-Being of Beneficiaries in Ada East District. Published online 2015.

Edusei A, Adjei-Domfeh P, Mprah WK, Opoku M, Badu E, Appiah SC. Assessing the Impact and Uses of the Disability Common Fund Among Persons with disabilities in Kumasi Metropolis in Ghana | Review of Disability Studies: An International Journal. Rev Disabil Stud An Int J. 2018;12(4):14.; Enoch A, Edusei AK, Paul O, Mensah AK, Adjei RO, Appiah-Brempong E. "We are not getting jobs": Job seeking problems of people with disability and coping strategies adopted in an urban traditional community in Ghana. Disabil CBR Incl Dev. 2016;27(1):109-125.

Appendix 2: List of included studies

Author, Year	Title	Study design	Type of literature
Adamtey et al., (2018)	Implementation challenges of social protection policies in four districts in Ghana: The case of the District Assembly Common Fund meant for Persons with disabilities	Qualitative study	Peer-reviewed article
Adjei-Amoako Y, (2016)	Promoting inclusive development in Ghana: disabled people's and other stakeholders' perspectives	Qualitative study	Peer-reviewed article
Adjei-Domfeh P, (2015)	Management of the Disability Common Fund: Challenges and Impact on the Lives of Persons with disabilities in Kumasi Metropolis of Ghana	Cross-sectional study	Grey literature - Thesis
Adjei N, (2013)	Putting decision into action: The Disability Act of Ghana, six years down the line.	Qualitative study	Grey literature - Thesis
Agboga S, (2015)	The contributions of the district's disability common fund to the well-being of beneficiaries in Ada East district	Cross-sectional study	Grey literature - Thesis
Arkorful et al., (2020)	Social Protection Policy or a Political Largesse: Disability Fund Efficacy Assessment and Roadblocks to Sustainable Development Goals	Qualitative study	Peer-reviewed article
Ashiabi & Avea, (2020)	The Absence of a Disability Measurement System in the Disbursement of the District Assembly Common Fund for Persons with disabilities in Ghana: How the Most Vulnerable are Denied Access	Cross-sectional study	Peer-reviewed article
Boamah D, (2019)	Examining Interventions in Ghana Towards Protecting the Human Rights of Persons with Physical Disabilities	Qualitative study	Grey literature - Thesis
Darkwah et al., (2019)	An evaluation of the impact of District Assembly Common Fund for the disabled: A study of the Asuogyaman District	Cross-sectional study	Peer-reviewed article
Edusei et al., (2017)	Assessing the Impact and Uses of the Disability Common Fund Among Persons with disabilities in Kumasi Metropolis in Ghana	Cross-sectional study	Peer-reviewed article
Esaaba et al., (2019)	Challenges of Inclusion: Local Support Systems and Social Service Arrangements for Persons with disabilities in Suhum, Ghana	Baseline Study Report	Grey literature

Author, Year	Title	Study design	Type of literature		
Naami & Liese, (2012)	The impact of unemployment on women with physical disabilities in Tamale, Ghana	Qualitative study	Peer-reviewed article		
Ocran J, (2017)	Disability and Stigma: Interrogating Middle- Class Experiences in the Social Spaces of Ghana	Phenomenolog- ical approach	Grey literature - Thesis		
Opoku et al., (2019)	Extending social protection to persons with disabilities: Exploring the accessibility and the impact of the Disability Fund on the lives of persons with disabilities in Ghana	Qualitative study	Peer-reviewed article		
Tsiboe K, (2020)	Describing the experiences of older persons with visual impairments during COVID-19 in rural Ghana	Qualitative study	Peer-reviewed article		
Others					
Ghana Somubi Dwumadie, (2020)	Mapping of SHGs and DPOs	Programme report			
Ghana Somubi Dwumadie, (July 2020)	Landscaping Analysis of Mental Health and Disability Inclusive Policies, Plans, Strategies, Services and Programmes	Programme report			
Ghana Somubi Dwumadie, (2020)	District Level Mental Health and Disability Plans in Ghana	Programme report			
Ghana Somubi Dwumadie, (2020)	Community Based Rehabilitation Initiatives for Mental Health and Disability in Ghana	Programme repor	t		

Appendix 3: Sample Application Forms

SOCIAL WELFARE AND COMMUNITY DEVELOPMENT (COMMUNITY DEVELOPMENT UNIT)

In case of reply, the Number and Date of this letter should be quoted

Our Ref. No.: Your Ref. No.:



REPUBLIC OF GHANA

Office of the Municipal Assembly Post Office Box 25, Sefwi Wiawso, Western North Region.

Date: 28th January, 2019

APPLICATION FORM FOR SUPPORT FROM DACF FOR PERSONS WITH DISABILITIES (PWDs)

	DATE
NAME OF APPLICANT	
AGE SEX MALE () FEMALE () TICK.	OCCUPATION
HOME ADDRESS	CONTACT
TYPE OF DISABILITY: BLIND, DEAF, PHYSICALLY CHALLENGE, N	MENTAL INTELLECTUAL, ALBINO
HAVE YOU BEEN GIVEN THE FUND BEFORE? YES () NO ()	IF YES, HOW MANY TIMES (1) (2) (3) TICK
ORGANISATION GBU, GNAD, DEAF, ALBINO, NON MEMBERS	5
APPLICATION: I WISH TO APPLY FOR SUPPORT FROM THE DA	CF FOR PWDs FOR MYSELF/ MY WARD.
AREA FOR SUPPORT:	
INCOME GENERATION (), EDUCATION (), HEALTH (), ASSI	STIVE DEVICE (), APPRENTICESHIP
DESCRIBE WHAT YOU WANT TO DO OR USE THE MONEY FOR	
TOTAL AMOUNT REQUESTED . GHC	Signature/ Thumbprint
FOR OFFICE USE ONLY.	
REMARKS	
TOTAL AMOUNT	APPROVED GHC
DATE OF APPROVAL OF APPLICATION	
Please attach photocopy of your ID card (Voter, NHIS, Passpo	rt etc) attach invoice and all bills available

Notes

Notes











Accra Rehabilitation Center, Barnes Road, Adabraka, Accra



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