

The owners of Ghana Card come swinging

It was almost sundown today when word came of a valiant attempt to counter our recent essay on how Ghana's national Identity (ID) Card project has [turned out to be a massive ripoff](#).

In between flights, time was made to read through this supposed "valiant effort" at presenting a counter-thesis in which the Ghana Card is indeed a brilliant and patriotic undertaking rather than the pernicious thing our [essay](#) claimed it was. Sadly, the counter was both underwhelming and disappointing.

Our antagonist, "a pollster and financial analyst", began his rebuttal with a wide-ranging recital of his credentials, immediately setting off alarm bells. **Some things didn't seem to add up too well.**

Three main sets of credentials were presented to beef up our antagonist's standing to write the definitive critique of our earlier [essay](#):

- He runs a private consultancy called DWA Risk & Financial Management Consulting Limited that specialises in Public-Private Partnership (PPP) structuring;
- He was a senior executive of London Underground [Limited], in which capacity he performed contract management and performance review of some of the world's largest and most complex PPPs;
- He has been at various times a top management functionary of the true owners of the Ghana Card, Margins Group, a non-executive director of that same entity, and chair of the finance committee of the entity's board of directors.

Regarding our antagonist's work at DWA, very little purpose is served by delving into it as there is scant record of the PPP activities it has apparently spearheaded in Ghana and abroad. So, we shall only look at his roles working for the London Underground and the Margins Group.

For coherence of analysis, it helps to post the claims verbatim:

About the author:

Mussa K. Dankwah, Executive Director, FCCA, MSc. (Finance), MCISI, AIRM. Executive Director at Global InfoAnalytics and Head of PPP Transaction Advisory at [DWA Risk & Financial Management Consulting Ltd](#)

The writer is the Head of PPP advisory at DWA Risk & Financial Management Consulting Ltd with over 20 years' experience working with PPPs. Mr. Dankwah was the PPP financial consultant for the Foreigners Identification Management Systems (FIMS) and the National ID Card projects between 2011-2018. Prior to joining the group as Executive Director for Commercial Finance and Business Support (2018 to 2022) to set up systems to ensure effective contract management are put in place to manage the operational phase of the project, Mr. Dankwah had served as nonexecutive director on the boards of Margins ID Group and ICPS and also chaired the finance committees of the boards. Mussa Dankwah had prior worked as finance manager in charge of risk and investment at the London Underground Limited, where he was involving in the contract management and performance review of one of the largest PPP contracts ever signed in the world, the Bakerloo, Central and Victoria (BCV) Lines, the Sub Surface Lines (SSL), and the Jubilee, Northern and Piccadilly (JNP) Lines. He authored the PPP feasibility study and the financial models that underpinned approval and implementation of the National ID project. Additionally, Mr. Dankwah worked as part of World Bank team that developed the PPP Guide for the Ministry of Finance and was also part of the World Bank team that assessed Ghana's infrastructure financing gap in 2017. He also worked as PPP financial advisor to the government of South Sudan on the Fula Rapid Hydro Dam and Juba Thermal Plant projects.

Because the author of the purported rebuttal of our essay sought to ground the superiority of his analysis, at least partly, on his intimate familiarity with complex PPP design, and the importance of his role at the Margins Group, it was natural to examine these claims as a prelude to taking his claims seriously.

London Underground

From the author's abridged biography (see screenshot above), he was the Finance Manager at London Underground Limited (a subsidiary of Transport for London – TFL) responsible for evaluating the contract management and performance review of the PPP tie-up that delivered major parts of the London subway system between 2004 and 2009.



Finance Manager - London Underground

Transport for London

Nov 2004 - Nov 2009 · 5 yrs 1 mo

Reviewing and assessing project proposals for approval by Underground and Transport for London Boards

Analysing and evaluating financial performance of projects

Performing value for money assessments for numerous projects within London Underground Limited and reporting on whether best value is achievable over the project life.

Review of tender documentation and supporting tender boards and negotiators to obtain best deal.

Provided the business with the required tools and mechanisms to accurately monitor and develop robust risk management strategies and techniques and deliver long term value to the business.

Advised senior management and protect teams on projects risk assessment and management strategies;

Advising management of risks and performance implication of financing options for major projects



Senior Partner

DankwahWalters& Associates

Aug 2005 - Oct 2009 · 4 yrs 3 mos

London, United Kingdom

PPP Advisory, Financial Modeling, Project Appraisal and Due Diligence

What he fails to tell his readers is that the said PPP was one of the most disastrous projects in British public finance history. The two private partners of London Underground, Metronet and Tubelines, ended up costing British taxpayers billions of sterling in wasted funds. Had the writer been candid, he would have disclosed that reams upon reams of documents are available in British parliamentary archives to document this unparalleled mess.

6. The collapse of Metronet comes as no real surprise to the RMT. From transfer in 2003 to administration in 2007 our representatives and activists employed by BCV and SSL were reporting to us poor project management, chaotic financial control and the de-skilling of their work. Two thirds of the PPP scheme—Metronet BCV and Metronet SSL—is now financially and operationally in ruins and essential upgrades are in jeopardy. In the run-up to the 2012 Olympic and Paralympic Games, London cannot afford another failure on this scale.

7. Since the collapse of Metronet, several claims have been made that the performance of Tube Lines demonstrates that it is simply the performance of Metronet and not the PPP itself which has proved to be a failure. RMT fully accepts that the performance of the project and engineering managers at Tube Lines has been better than that at Metronet; it could hardly have failed to be so.

8. However, the financial environment created by the PPP, and enjoyed by Tube Lines brings into serious question whether the scheme can be considered in any respect to be value for money.

Extract from Memo by Rail, Maritime & Transport Workers Union (RMU), November 2007

In 2007, Metronet went bankrupt after [declaring the PPP unsustainable](#). In 2010, the other private partner, Tubelines, also went bust, forcing the British government to step in and buy it out. [Post-mortem analysis](#) showed the entire PPP to have been onerous,

unworkable and a financial wreck. Is our writer seriously taking credit for this disaster as part of establishing his bona fides? His claim to wisdom in guiding the Ghanaian public on matters PPP is that he was the contract manager for one of the worst PPPs the world has ever known?

Anyway, having carefully examined the parliamentary record (some summaries [here](#) and [here](#)), and gone over reams of documents generated as a result of various enquiries and court proceedings (including even pre-termination disputes such as this [one](#)), we are fairly confident that every “significant” corporate player in this saga is now well known to us. Names like Stephen Richards, Charles Doyle, Gaynor Mather, Danny Myers, and of anyone who stepped foot on any of the rungs on the reporting ladder leading up to Tim O’Toole, the larger-than-life Managing Director of London Underground in the relevant periods, dot the record. **Surprisingly, there isn’t a single mention of our antagonist, not even once.** To whom did he report in respect of PPP matters at London Underground? Well, maybe, we have been too harsh in ascribing blame to him for the disastrous performance of the PPPs he claims to have managed. Maybe, he wasn’t around much.

Be all that as it may, having participated in the BCV and JNP PPPs in London, in whichever fashion, should be the last thing anyone attempting to gain credibility in a debate about PPPs should mention.

Margins Group

Given how he intones so authoritatively on the merits of Margins Group’s role in the Ghana Card PPP, our antagonist clearly must have a vested interest in the matter. It is not surprising, therefore, that he claims to have served on the board and chaired the crucial finance committee. The only problem is that we have painstakingly examined the archival back-copies of the Margins Group website going back to 2003, paying close attention to the years in which he claims to have served in that capacity, and we can’t find a trace of him.



Margins Group

9 yrs 9 mos

- **Chairman, Board Finance Committee**

Contract

May 2012 - Jan 2022 · 9 yrs 9 mos

Accra, Ghana

Mr. Dankwah was initially appointed as an Independent Non-Executive Member of the Margins ID Group and its subsidiaries:

Mr Dankwah until his resignation from the board in 2022 to focus on polling, was the chairman of the Finance Committee of Intelligent Card Production Systems Ltd, IMS Ghana Ltd, the subsidiary in charge of the foreigners' registration project with NIA, IMS II Ghana Ltd, the company delivering the national ID card project, Margins ID Systems Applications Ltd. Mr Dankwah become Executive Director of the Group with responsibility for Commercial Finance & Business Support until the end of his contract in March 2021.

- **PPP Financial Consultant**

Full-time

Oct 2015 - Sep 2018 · 3 yrs

Accra, Republic of Ghana

Development of feasibility study for the national ID card project, building PPP financial model including revenue models and government support agreement models, viability gap funding, risk analysis and management.

Why would Margins hide such a critical member of its Board for 10 years and refuse to publicly acknowledge him on their Board?
Why would they not disclose him to the Registrar-General of Companies, as required by law?

BOARD OF DIRECTORS

Our leadership team of industry experts are the embodiment of our core values and set the standard of excellence for all employees across our subsidiaries

MOSES K. BAIDEN JR.
Moses Baiden Jr is the founder and chairman of Margins ID Group and its 5 subsidiaries. He has over 30 years of experience in business development, sales, marketing and manufacturing. With Baiden at the helm of Margins ID Group, the company has built itself a solid reputation and impressed customers with its identity-focused security products, which connect people to solutions and services in a digitalised world.

PETER BLOM
Peter Blom is an ingenious, energetic businessman with a 35 year track record working in the Americas, Africa, Asia, and Europe. He has a demonstrated ability to identify potential markets, and has successfully founded several companies in competitive industries, and fast-paced environments.

FRANK OYE
Frank Oye is a business and management consultant with over 15 years of experience in business development and strategic planning. He has significant experience in appraising multi-million infrastructure projects across a span of industries covering transport, public health, agriculture, ICT, risk management and Public Private Partnerships.

HENRIK HENRIKSEN
Henrik Henriksen is the Regional Director, West Africa, Investment Fund for Developing Countries (IFU) and has over 15 years of experience posting in West Africa and Asia a.o. for the Maersk Group.

KWESI A. BAIDEN
Kwesi A. Baiden practised Mergers and Acquisitions and Corporate Finance law with firms from New York to San Francisco. He is currently the Chief Compliance Officer and Senior Associate General Counsel of Transocean overseeing their global compliance program. Prior to that, he was the Associate General Counsel for Valaris Plc and Enscor Plc, now Enscotrowan.

EMMANUEL SELBY
Emmanuel Selby is the CTOO of Margins ID Systems Application (MDSA), overseeing the development, and dissemination of technology for external customers, vendors and other clients. With over two (2) decades of experience in identity management and operations, Emmanuel has led Margins ID Group's growth strategy, to include numerous strategic projects, Public-Private Partnerships, and offtake arrangements in Ghana and across Africa.

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If, perchance, we have missed these company filings or other webpages, our antagonist can publish them, as well as better and more precise details of the specific reporting lines he participated in at London Underground.

Can we take our antagonist seriously?

Having failed by our own efforts in this preliminary stage of trying to validate the bona fides that our antagonist hoisted like a banner before proceeding to make his arguments, our first instinct was not to bother with a reply. The reason being that many of the claims

he made were presented with an authority that could only have come from the privileged positions he postures to have held. However, in view of the public interest, we would proceed to tackle the arguments themselves, on their own merits.

“False claims”

Our swashbuckling protagonist commences his handiwork by labelling our assertions, even though each one was backed by easily accessible documents in the public domain, as “false claims”.

Article: Bright Simons claims about “Ghana Card” are false

It is good to criticise but certainly, we must do so with facts, and I will not be part of any project designed to rip off my country Ghana

 Wilberforce Asare  · April 2, 2024

 7,264



His choice of words is really funny considering the large trove of documents submitted by Margins to various government agencies on financial matters in our possession that we did not cite in order not to breach trust and endanger whistleblowers. Many Ghanaians will be shocked at the sums involved in these proposed and in-the-works deals. Yet, despite diligently choosing to rely only on official, publicly verifiable, documents, we are still met with the charge of falsity.

Let us tackle the issues one after the other

- Our sword-swinging, swashbuckling, falsehood-accusing, antagonist claims that the “main technology assets” of the Ghana Card cannot be said to belong to Margins because there is a “central site” with various facilities owned by the government of Ghana where certain components of the technology sits. This is a weak and diversionary argument. In the original essay, the point is definitely made that there has been a belated attempt to create the pretence of a transfer of the core technology assets to Ghana. This pretence has simply created conditions for Margins, as the inevitable contractor for some of these expensive projects, to make more money off Ghana that was not anticipated in the original agreement, since Margins was supposed to be fully responsible for technical infrastructure.
- Moreover, the ongoing cosmetic efforts do not change the fact that all the valuable components of the technology and the most critical licenses for the encryption, cryptography, biometric suites, etc. remain vested in Margins. Nothing in the mass of verbiage spun by our antagonist addresses this fundamental point. The most sensitive, most indispensable, and most non-reproducible components of the system, where all the value resides, are owned and controlled by Margins, and they alone can

operate and allow any other system to interface with the Ghana Card. Margins' business interests and considerations, not national policy, dictates who gets access, by what means, for how much money, and with what constraints and enhancements.

- Despite acknowledging that the Margins solution has been set up such that the government is forced to buy the ID cards only from the security printing subsidiary of Margins – ICPS (which, by the way, is not the same company that the NIA has signed the PPP contract with), our antagonist twirls and curls and dances around, arriving at no serious point. If the specifications of the system were not designed such that other security printers can create ID cards compatible with the backend software and aligned with the necessary security measures, then what will Ghana do if, God forbids, the Margins ICPS factory catches fire? There is no logic in creating a solution of multiple components that are nonetheless so closely-coupled that a whole country is forced to deal with the subsidiary of just one company for every aspect of a system on which every aspect of civil life is being forced to depend on.
- Calling the National Identification Authority, as the public+national interest holder in the Ghana Card PPP, a “zombie” was based on a very clear case, backed by very clear evidence. This is an organisation that could not develop a simple list of project definitions and had to copy the text wholesale from websites belonging to UAE agencies. Let’s even ignore the plagiarism, is such an organisation going to be capable of ensuring sound technology governance in an elaborate technical project of this calibre? Our antagonist deliberately skirts around the issue, says nothing of substance about the clearly demonstrated incapacity of the NIA, and mumbles something about why the government side in a PPP should be content about lacking capacity to influence project design in the public interest. He also has no qualms about such a critical agency supervising the rollout of technology principally to boost outcomes beneficial to a private corporation but detrimental to the public.
- In breaking down the cost of the Ghana Card, we referred to documents presented to Parliament detailing the cost breakdown to a government agency (the NHIA) planning large purchases from the Margins Group. It has always been clear that the full cost of delivering a card into the pocket of a Ghanaian isn’t fully captured in the Margins’ catalog price. This is because the NIA bears many costs, from personnel to physical infrastructure, and the country, via various agencies, subsidises the entire operation beyond the card purchase costs through direct financial transfers to Margins, software verification and integration charges, and tax exemptions.
- To get to the full cost of each Margins card, one must factor in all these *hidden costs*. In fact, that is why when individuals decide to obtain the card without going through the messy headaches of a “mass registration exercise”, they are charged roughly \$20, an amount that still does not reflect the full spectrum of hidden costs but only covers data capture costs borne by the NIA and the cost of the Margins technology element. The De La Rue contract with Rwanda, which our antagonist airily denigrates, likewise covers the card delivery and data capture, and still comes to \$0.9 per unit. Attempts to suggest that Margins’ technology is superior to De La Rue’s has never been backed with any evidence since Ghana has been known to trust the same company with printing of the national currency. In the world of security printing, currency production is the apex of sophistication. Colloquially known as the “central bank level”, and based on the minimal foundation of ISO 14298:2021, security printers that have produced currency for a wide range of governments cannot be dismissed as peddling inferior technology without evidence.
- Our antagonist makes this observation: “The writer refers to the US\$124 million as a start-up contribution by IMS, again, this is a false claim.” Of course, if he had read the original essay with eyeglasses of the right prescription, he would have seen clearly that the \$124 million figure was stated as the amount meant to be **contributed by the government of Ghana, and**

NOT Margins. The argument there, which he does not rebut, is that the government has ended up spending far more than this and will continue to spend far in excess of what has already been spent without the phantom revenues that the project was supposed to generate.

- The important point here is that Ghana Card has become a **fiscal albatross** around the neck of the government. Shadowy figures are being enlisted to forge directives on behalf of even independent branches such as the judiciary in a misguided and, frankly ridiculous, bid to meet unrealistic and comical revenue targets. Civic initiatives of the most sensitive kind, such as voter registration, were, not very long ago, being held hostage because the country owes Margins, and until it paid, Margins wouldn't release ID cards, and if they don't then registration cannot proceed because someone has proclaimed a harebrain edict barring people from registering to vote if they don't have a Ghana Card. **THIS IS TOTAL MADNESS.** A national ID card project should never become a massive profit making gig that starts to dictate how critical institutions of national life behave. No country in the world has set up an arbitrary, illogical, \$1.2 billion dollar revenue target plus cost-recovery plus 17% guaranteed return for private investors all tied to what should be a basic national identity card!
- The fact that Rwanda took \$40 million from the World Bank, at a near-zero interest rate to set up a state-controlled national identification system and is now in a position to run an international competitive tender to select the most optimal vendor to supply services such as card production and data capture is precisely the kind of **unbundling** this author and others are demanding be done in the case of the Ghana Card. Ghana refused to accept World Bank money, as part of the e-Transform initiative, to finance a solution that will be non-profit based, exclusively public interest focused, and with the **core data registry and authentication software controlled by the state**, precisely because this tottering scheme sucking millions of dollars out of state coffers through different agencies suit some political nabobs better. So, instead, the country is today paying Margins large sums of money using expensive treasury bills at nearly 30% interest rate per annum. And, on top of that, buying cards at ridiculous prices for infants.
- Large swathes of the article purporting to respond to our essay are incoherent and thus best left to the reader's own assessment. They do not really address anything from the original essay to which it is purportedly a response. For example, this gem of insight from the article: "[Margins] will not make excess revenue beyond what is agreed in the contract except in a situation where the government recovers all the amount paid in the form of revenue guarantees and recovers the cost of running NIA and all its offices nationwide." Nowhere in the original essay is any attention paid to any "excess revenue". The point canvassed in the essay, which cannot be controverted, is that five years into the PPP, the purported "revenues" that were meant to accrue to the government for covering the inflated costs of running the system have failed to materialise because these sham revenues are supposed to come from government agencies that are not profit-making by orientation. Essentially, round-tripping of the most cartoonish kind. So, effectively, the government will likely be in deficit for the remainder of the term of the PPP even as Margins laughs all the way to the bank.

The risk of responding to our antagonist was always in the possibility of further distracting the Ghanaian public from what is essential. Which is three-fold:

- There are good PPPs and there are bad PPPs. Ghana Card, as currently designed, is a bad PPP. Its subject matter, a national identification system, cannot be setup as a massive profit-making gig so much so that policies are made with the primary intent of generating revenues to enrich some business guru. That whole arrangement needs a complete and total rethink. It leads down the path of absurdity.
- A national identification system cannot be operated on the whims of powerful business interests, who own the core assets in

such a closely held fashion that the country is denied value for money. The SIM card registration process became a mess because the private operator of the national identification system initially presented charges so ridiculous that it offered cover for other politically connected business interests to push through a bypass, seriously inconveniencing citizens who had to join long queues to provide biometric data all over again to murky custodians. India has provided the world with spectacular examples of how Digital Public Benefit Infrastructure should be set up in how it approached the Aadhaar and the whole India Stack technology suite. There are today more than 100,000 subcontractors of the Aadhaar system regulated in a robust and transparent way by UIDAI, the national operator. There are none of the crazy integration costs that have seen state agencies in Ghana saddled with millions of dollars in bills when they attempt to harness the power of the Ghana Card. India has, contrary to Ghana's profit-gouging model, activated more than 650 regional government agency programs and about 350 national-level ones by focusing on public benefits.

- Lastly, the NIA as currently governed lacks the incentive structure to focus on maximizing the benefits of the national identity ecosystem. It does not appear to be focused on how to work across the range of legacy systems that exist and make life easier for citizens. Instead of working with other agencies to **facilitate identification** of citizens, the NIA's primary task in the last few years have been to **exclude** citizens who do not have Ghana Cards due to its single-minded devotion to the cause of Margins Group and its glorious profits. Despite the remarkable success of Aadhaar in reaching ~95% of India's population, the Indian equivalent of NIA, the UIDAI, has not been rampaging all across the land to block voting rights to citizens who do not have the Aadhaar. Thus, India's current posture towards voter identification continues to remain facilitatory rather than exclusionary.

2. The Commission has directed that all electors in all constituencies who have been issued EPIC have to produce the Electors Photo Identity Card (EPIC) for their identification at the polling station before casting their votes. Those electors who are not able to produce the EPIC shall produce one of the alternative photo identity documents mentioned in paragraph 8 of the Order for establishing their identity. The list of documents is reproduced below for clarity:

- (i) Passport,
- (ii) Driving License,
- (iii) Service Identity Cards with photograph issued to employees by Central/State Govt./PSUs/Public Limited Companies,
- (iv) Passbooks with photograph issued by Bank/Post Office,
- (v) PAN Card,
- (vi) Smart Card issued by RGI under NPR,
- (vii) MNREGA Job Card,
- (viii) Health Insurance Smart Card issued under the scheme of Ministry of Labour,
- (ix) Pension document with photograph,
- (x) Official identity cards issued to MPs/MLAs/MLCs, and
- (xi) Aadhaar Card.

Extract from a directive by the Election Commission of India (2019)

A government agency that exists primarily to enrich a private corporation has lost its functional purpose and must be completely overhauled.

Nothing that our swashbuckling antagonist, with his chain of PPP credentials from King's Cross to Kasoa, wrote will take this

country forward in coming to terms with the albatross that the Ghana Card, as currently designed, is becoming. While a pampered and highly favoured Margins strides akinbo across the public sector asking for even more elaborate schemes to be set up to give it deeper control over all aspects of Ghanaian civic life, our only plea to the Ghanaian people is: shine your eyes.