

## TERMS OF REFERENCE FOR CONSULTANT ENGAGEMENT

### **National Research Study on Wealth Taxation Policies (Commercial and Business Properties) and Illicit Financial Flows Vulnerabilities among High-Net-Worth Individuals in Ghana**

#### **1. Background and Context**

NORSAAC is a human-rights, community engagement, and policy-influencing organization serving Ghana to promote social transformation and improved living conditions. The organization works with networks of women, youth, children, excluded groups, and like-minded organizations to strengthen their agency to claim and exercise their rights. Since 2002, NORSAAC has become one of Ghana's leading organizations collaborating with communities and target groups to empower individuals through increased knowledge and skills.

Building on its extensive experience in community engagement, rights-based advocacy, and policy influencing, NORSAAC with support from OXFAM in Ghana is deepening its focus on domestic revenue mobilization as a critical pathway to sustainable development. The organization recognizes that adequate and generated domestic revenue is essential for funding public services that benefit vulnerable groups, including women and children. This research study on wealth taxation and Illicit Financial Flows represents a strategic evolution of NORSAAC's policy-influencing work, applying its established methodologies to the tax justice sector.

Ghana faces persistent challenges in mobilizing adequate domestic revenue to finance its development agenda. Wealth taxation on commercial and business properties remains underexplored and underutilized, while Illicit Financial Flows (IFF) involving High Net Worth Individuals (HNWI) continue to erode the tax base. Literature confirms that African countries lose an estimated USD 50 billion annually to IFFs. In Ghana, the Ghana Revenue Authority has acknowledged gaps in tracking HNWI income and asset declarations, particularly in real estate and commercial property sectors.

This study is a strategic follow-up to earlier research conducted by NORSAAC titled "Gap Analysis on Property Rate and Tax at the MMDAs Level." That research revealed significant administrative and compliance gaps at the Metropolitan, Municipal, and District Assembly level, including poor data management and low taxpayer awareness. Lessons from that research demonstrate that focusing solely on local property taxation without examining the broader wealth tax ecosystem leaves critical revenue sources untapped. This study will draw selectively on excerpts from the earlier Gap Analysis research to strengthen analytical continuity and policy relevance.

#### **2. Purpose of the Assignment**

The purpose of this consultancy is to conduct a rigorous, evidence-based national research study that assesses the current state of wealth taxation policies affecting commercial and

business properties and examines the vulnerabilities of Ghana's tax system to Illicit Financial Flows involving High-Net-Worth Individuals. The assignment will produce actionable policy proposals and facilitate stakeholder validation and dialogue processes, leading to the formal presentation of recommendations to tax authorities and policymakers.

Specifically, the consultant will:

- a. Comprehensively map and assess existing wealth taxation policies applicable to commercial and business properties in Ghana, including property rates, capital gains taxation, and any ancillary levies, with a focus on evaluating their coverage, administrative effectiveness, enforcement mechanisms, and implementation challenges.
- b. Identify and analyse the specific mechanisms and channels through which High-Net-Worth Individuals engage in Illicit Financial Flows within the Ghanaian tax system, including underreporting of capital gains, transfer mispricing, the strategic use of shell companies, and the exploitation of valuation gaps in commercial property taxation.
- c. Evaluate the administrative, legal, regulatory, and compliance-related gaps within Ghana's domestic tax ecosystem that enable and perpetuate Illicit Financial Flow vulnerabilities among High-Net-Worth Individuals, drawing selectively on lessons and findings from the earlier Gap Analysis on Property Rate and Tax at the MMDAs Level conducted by NORSAAC.
- d. Develop, refine through stakeholder validation, and formally present a set of evidence-based policy proposals for reforming wealth taxation on commercial and business properties and for reducing Illicit Financial Flow vulnerabilities associated with High-Net-Worth Individuals, targeting the Ministry of Finance, the Ghana Revenue Authority, and parliamentary select committees.

### **3. Scope of Work**

The consultant will undertake the following tasks:

#### **Desk Review**

Conduct a comprehensive desk review of existing literature, laws, regulations, policy documents, and prior studies relevant to wealth taxation, commercial property taxation, capital gains taxation, and Illicit Financial Flows in Ghana. This review shall include a detailed examination of the prior NORSAAC Gap Analysis on Property Rate and Tax at the MMDAs Level, drawing selectively on its relevant excerpts and findings to ensure analytical continuity.

#### **Inception Report**

Develop a detailed inception report outlining the final research methodology, sampling strategy, data collection tools, a detailed work plan with clear milestones, risk mitigation strategies, and ethical protocols including informed consent procedures and data anonymization measures. The inception report must be submitted for approval before any data collection commences.

## **Data Collection**

Collect primary and secondary data as follows:

- i. Quantitative analysis of anonymized tax return data for High-Net-Worth Individuals from the Ghana Revenue Authority, commercial property valuation records from the Lands Commission, corporate ownership filings from the Registrar General's Department, trade statistics from the Ghana Statistical Service and any other relevant sources.
- ii. Qualitative semi-structured interviews with a minimum of thirty stakeholders distributed across Ghana. Stakeholders must include officials from the Ghana Revenue Authority (Domestic Tax Revenue Division), the Valuation Division of the Lands Commission, selected Metropolitan, Municipal, and District Assemblies, financial institutions, real estate developers, civil society organizations, and at least five High Net Worth Individuals or their representatives.

## **Data Analysis**

Analyse the collected data using appropriate tools and methods. Triangulate findings from multiple data sources to ensure validity and reliability.

## **Draft Report Preparation**

Prepare a comprehensive draft research report presenting preliminary findings, analysis, and draft policy recommendations. The draft shall include a dedicated chapter analysing lessons drawn from the prior NORSAAC Gap Analysis research.

## **Final Deliverables Production**

Produce the final research report, a policy brief, a co-authored article for submission to a peer reviewed journal, an infographic summary (content and data points), and a presentation slide deck (content) incorporating all feedback from the validation workshop and any subsequent reviews.

## **National Advocacy Dialogue Presentation**

Present the final findings and policy proposals at a national advocacy dialogue organized by NORSAAC, targeting senior tax officials, policymakers, and civil society actors.

## **4. Deliverables**

The consultant shall produce the following deliverables:

- i. Inception Report
- ii. Final Research Report
- iii. Policy Brief
- iv. Infographic Summary
- v. Presentation Slide Deck for National Advocacy Dialogue
- vi. Meta data of the study

vii. Co-authored article for publication in a peer reviewed journal

## **5. Duration**

The consultancy is expected to be completed within four months (May to August 2026). The consultant will work closely with NORSAAC to develop a detailed timeline as part of the inception report.

## **6. Reporting and Coordination**

The consultant will report to the Research and Program Quality Manager at NORSAAC and work closely with the project team. Regular progress updates and coordination meetings will be required.

## **7. Confidentiality and Data Protection**

The consultant shall treat as confidential all non-public information obtained during this assignment, including any administrative data, stakeholder information, interview notes, and findings not yet approved for publication by NORSAAC. The consultant shall implement appropriate safeguards for data handling, storage, access control, and transmission. Any personal data collected through interviews shall be processed lawfully and used only for the purposes of this study, with informed consent and appropriate anonymization. The consultant shall not share any data or identifiable information with third parties without prior written authorization from NORSAAC.

## **8. Ownership of Outputs and Use of Materials**

All outputs produced under this consultancy, including datasets compiled for the assignment (where legally permissible), interview instruments, transcripts/notes, analysis files, reports, policy briefs, infographic content, and presentation materials, shall be the property of NORSAAC. The consultant may not publish, disseminate, or otherwise use the outputs (in whole or in part) without prior written consent from NORSAAC. The consultant remains responsible for ensuring that any third-party materials used are properly referenced and do not infringe intellectual property rights.

## **9. Payment Schedule**

Payment will be made upon satisfactory completion and acceptance of deliverables, as follows (unless otherwise agreed in the contract):

- 40% upon approval of the Inception Report and work plan.
- 30% upon submission of the Draft Research Report.
- 30% upon approval of the Final Research Report and submission of the Policy Brief, Infographic Summary content, and Presentation Slide Deck content.

## **10. Quality Assurance and Review of Deliverables**

NORSAAC will review and provide consolidated feedback on each submitted deliverable within ten (10) working days. The consultant shall address comments and resubmit the revised deliverable within an agreed timeframe, typically not exceeding ten (10) working days. Acceptance of each deliverable will be confirmed in writing by NORSAAC.

## **11. Qualifications and Experience**

### **11.1 Educational Qualifications**

The consultant or lead researcher must possess a postgraduate degree (Master's or Doctoral) in economics, public finance, taxation, law, or a closely related field from a recognized university.

### **11.2 Professional Experience**

- i. A minimum of ten years of professional experience in tax policy, illicit financial flows, public financial management, or domestic revenue mobilization.
- ii. At least five years of this experience must be specifically focused on Ghana or the West African sub-region.
- iii. Demonstrated experience conducting mixed-methods research at national scale
- iv. A proven track record of producing policy-relevant research that has influenced government decisions, legislative processes, or administrative reforms.

### **11.3 Technical Knowledge**

- i. Familiarity with Ghana's tax laws, including the Revenue Administration Act, the Income Tax Act, and the Local Governance Act as it relates to property rating.
- ii. Understanding of the operations of the Ghana Revenue Authority, particularly the Domestic Tax Revenue Division.
- iii. Knowledge of the property rating system and valuation processes at the MMDA level.
- iv. Awareness of international frameworks and best practices relating to Illicit Financial Flows, including the work of the Tax Justice Network, the African Tax and Administration Forum.

### **11.4 Desirable Attributes**

- i. Prior experience working with civil society organizations on advocacy, accountability, or governance initiatives.
- ii. Published research or articles on wealth taxation, capital gains taxation, or Illicit Financial Flows in peer-reviewed journals or reputable policy platforms.
- iii. Established relationships with key stakeholders in Ghana's tax ecosystem, including the Ghana Revenue Authority, the Ministry of Finance, or civil society networks.

## 12. Application Process

Interested consultants or firms are required to submit the following:

- i. A technical proposal not exceeding fifteen pages, detailing understanding of the assignment, proposed methodology, and work plan.
- ii. A financial proposal providing a detailed breakdown of all costs, including professional fees, travel costs, and any other expenses.
- iii. Curriculum vitae of the consultant (for individual applicants) or the lead researcher (for firm applicants), highlighting relevant experience.
- iv. At least two samples of similar research reports or policy briefs produced within the last five years.
- v. Contact details of three professional referees who can attest to the quality of the applicant's previous work.

## 13. Evaluation Criteria

Proposals will be evaluated based on the following criteria:

Criterion	Weight
Technical expertise and relevance of experience (qualifications, years of experience, sector knowledge)	40%
Quality and feasibility of the proposed methodology and work plan	30%
Cost-effectiveness and reasonableness of the financial proposal	20%
Demonstrated understanding of the project's objectives and context	10%
<b>Total</b>	<b>100%</b>

## 14. Contact and Submission Information

Applications should be submitted to [recruitments@norsaac.org](mailto:recruitments@norsaac.org) and copy [info@norsaac.org](mailto:info@norsaac.org) by 20<sup>th</sup> May 2026.

For further inquiries, please contact [sadat@norsaac.org](mailto:sadat@norsaac.org) with [kawusada@norsaac.org](mailto:kawusada@norsaac.org) and [toyibu@norsaac.org](mailto:toyibu@norsaac.org) in copy.