

## **THE RELIGIOUS MARKET IN GHANA TODAY: IS THERE LEGAL BASIS TO TAX THE CHURCH?**

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### **ABSTRACT**

This paper is a rehash of the existing debate on whether or not the church should be subject to tax. Unlike many others, the paper approaches the issue from a legal perspective and explores the relevant principles of taxation as established by statutes and case law in Ghana. In the main, this paper argues that given that majority of the churches in Ghana engage in transactions which may be properly classified as business, the Commissioner of Income Tax is empowered by law to demand tax from the church in respect of the income accruing therefrom. Thus, using the interpretive paradigm mainly through interviews, observation as well as reliance on statutes and case law, the paper concludes that transactions such as the taking of service fees, sale of anointing oil and other religious products constitute trade and the income arising thereto must be subject to tax.

**Keywords:** Religious Market, Trade, Tax, Church, Ghana

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## INTRODUCTION

It is difficult to rule out religion in human existence since it is apparently part and parcel of the social fabric that satisfies human needs.<sup>3</sup> In indigenous religions, which pre-lived established ones, ritual functionaries sell herbal medicines for supposed cure of all kind of sicknesses. Similarly, Judaism permitted commercialisation of religious items. This practice appears to have reached its climax at the time of Jesus who condemned the practice. The Catholic Church in the Medieval Age was also involved in sales of bulls, one of the major factors that occasioned the Reformation.<sup>4</sup> The abuse of power by this official religion at the time made it necessary for European thinkers at the time to sever its influence over state or public life.

The 19<sup>th</sup> and 20<sup>th</sup> centuries, however, saw the resurgence of Christianity in the global North and proliferation of New Religious Movements of Pentecostal brands in the global south, particularly Asia and Africa.<sup>5</sup> Pentecostal Christianity is that type of Christianity that emphasises the active presence of the Holy Spirit and the manifestation of the power of the Spirit in concrete signs and miracles as an integral part of the Gospel and its proclamation.<sup>6</sup> This shows that religion is pretty much alive globally, and that it has not died out as predicted by the Enlightenment scholars.

In many African countries, there are 'business' interactions between pastors/prophets on one hand and their clients, mostly congregants or religious window-shoppers, on the other over the sale of religious products and services.<sup>7</sup> In Ghana, Churches, particularly, the Pentecostal ones compete with each other over membership in the religious field.<sup>8</sup> This apparent yearn for niche and membership compels these Churches to use diverse strategies to make themselves attractive to prospective members. For instance, stories about miraculous healings from strange diseases, and liberation from demonic attacks attract huge followership.<sup>9</sup>

The churches also commercialize religion or offer for sale religious products and services such as 'special prayers', anointing oil, 'holy water', and many others to congregants who are in constant search for 'successful marriages', 'well-paid jobs', 'access to visas' and other miraculous interventions. Commercialisation of religion, as used in this sense, refers to the exchange processes that involve the use of money by religious actors (both church and non-church members) to acquire Christian religious items/products and services offered for sale by some

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<sup>3</sup> Kofi Asare Opoku, *West African Traditional Religion*. Singapore: FEP International Private Ltd., (1978). See John S. Mbiti, *African Religions and Philosophy*. (2<sup>nd</sup> rev. ed.). London: Heinemann Educational Books, (1989). See Yin's writings (2018; 2020; 2021; 2022) on religion in prison. He demonstrates the pervasive nature of religion in Ghanaian society through inmates' social construction of their religious reality.

<sup>4</sup> Jack L. Arnold, *The Cause and Results of the Reformation*. III Magazine Online: 1, 2. (March 8-14 1999).

<sup>5</sup> David B. Barrett, *Schism and Renewal in Africa: An Analysis of Six Thousand Contemporary Religious Movements*. Oxford: Oxford University Press, (1968).

<sup>6</sup> Emmanuel K. Larbi, *Pentecostalism: The Eddies of Ghanaian Christianity*. Accra, Ghana: Centre for Pentecostal and Charismatic Studies, (2001); Cephas N. Omenyo, *A Study of the Development of Charismatic Renewal in the Mainline Churches in Ghana*. Zoetermeer: Uitgeverij Boekencentrum, (2002); Johnson K. Asamoah-Gyadu, *Signs, Wonders, and Ministry*, 33-46.

<sup>7</sup> Pius O. Abioje, *The Mass Media and Commercialisation of Religions in Nigeria*, 3; Bureau of Market Research, *An investigative study of the commercialisation of religion in the Republic of South Africa 2016: Gauteng Pilot Study*. The Commission for the Promotion and Protection of the Rights of Cultural, Religious and Linguistic Communities, (August 2016): xii.

<sup>8</sup> Johnson K. Asamoah-Gyadu, *African Charismatics*, 14; Koduah, A. *Christianity in Ghana Today*. Accra, Ghana: Advocate. (2004); George Anderson Jnr, *Commercialization of Religion in Neo-Prophetic Pentecostal/Charismatic Churches in Ghana*, 1.

<sup>9</sup> Henri Gooren, *Religious Conversion and Disaffiliation*, 132.

Churches in Ghana<sup>10</sup>. The orthodox churches such as the Roman Catholic Church, the Anglican Church, the Methodist Church, and the Presbyterian Church which have not yet been completely taken over by the excesses of the Pentecostal wave have equally devised means to generate income. Some of these orthodox churches own rubber plantations which are major sources of income. Others operate hostel facilities on University campuses as a means to generate revenue for the church.

It is this exchange of religious products and money between pastors/prophets in Pentecostal churches and clients in Ghana as well as other business ventures of some of the churches that this paper investigates. The objective is to ascertain whether the Commissioner of Income Tax has locus to make an assessment of the tax liability of these churches. The paper is significant to the extent that it re-awakens the debate on church taxation and provides a legal framework for determining whether or not it is time to demand tax from the church.

Pentecostal Christianity in Africa focuses on prosperity and active involvement in society. In Pentecostal churches in Ghana, the theology of being wealthy and rich connotes a sign of God's blessings and every Pentecostal seeks it. This type of blessing is in the form of material possession such as cars, houses, money, and fame.<sup>11</sup> Traditionally in Ghana, money or wealth is perceived as a sign of God's blessings and of spiritual power and authority.<sup>12</sup> This view reflects African traditional religious interpretation of salvation in terms of material prosperity and wealth that has been adopted in Pentecostalism.

Perceptively, the church and religious ideology are understood as an arena for negotiating claims to wealth as well as displaying wealth, and success; the pastor depends on mobilising support and establishing a congregation. It means that wealth is also in people, in social relations and has a cultural meaning that change over time. Wealth is closely linked to social identity and to the making of social relations. It is also about recognising it, claiming it, and displaying it.<sup>13</sup>

## **METHODOLOGY**

This paper is qualitative as it relies mainly on descriptive and analytic tools in dealing with the subject under study. As Cartik R. Kothari<sup>14</sup> maintains, descriptive analysis allows for an in-depth observation of a particular phenomenon and to define its parameters. Therefore, since the matter under consideration cannot be subjected to microscopes in the laboratory, the appropriate tool to employ is language which helps to describe phenomenon.

Data was produced through personal interviews and participatory observation from April 2016 to December 2017 from four Pentecostal/Charismatic churches. One church from Cape Coast (Central Region), and three from Kumasi (Ashanti Region). Respectively, the churches were;

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<sup>10</sup> George Anderson Jnr. Commercialisation of Religion in Neo-Prophetic Pentecostal/Charismatic Churches in Ghana: Christian Ethical Analysis of their Strategies. *Journal of Philosophy, Culture and Religion*, 5(42), (2019): 2.

<sup>11</sup> Paul Gifford, The Complex Provenance of Some Elements of African Pentecostal Theology, in Corton, A. & Marshall-Fratani, R. (Eds.). *Between Babel and Pentecost. Transnational Pentecostalism in African and Latin America*. Bloomington and Indianapolis: Indiana University Press, (2001): 62-65; Birgit Meyer, Commodities and the Power of Prayer: Pentecostalist Attitudes Towards Consumption in Contemporary Ghana, *Development and Change*, 29, (1998): 751-776.

<sup>12</sup> Karen Lauterbach, *Wealth and Worth*, 106.

<sup>13</sup> Karen Lauterbach, *Wealth and Worth*, 107.

<sup>14</sup> Cartik R. Kothari, *Research Methodology: Methods and Techniques*, (2<sup>nd</sup> rev. ed.). New Delhi: New Age International (P) Limited, Publishers, (2004): 2.

House of Prayer for All Nations, International God's Way Church, Ebenezer Miracle Worship Centre, and Run for your Life Ministry. These churches were chosen because they are famous for what may be termed as 'commercialisation of religion'. Consequently, using these as case studies was proper because their activities are reflective of churches with similar doctrines in Ghana. There were also occasional visits to the orthodox churches such as the Roman Catholic Church, the Presbyterian Church, the Methodist Church, and the Anglican Church, in Cape Coast and Takoradi. Such visits were purposive in that they were designed to have personal communication with Rev. Ministers and where appropriate some church elders over the subject under study. Apart from the primary data collected through in-depth interviews, the paper also relied on secondary data, including statutes and case law. Twelve females and eighteen males were purposively sampled, and interviewed. Analysis was done by drawing connections between the field data, literature, statutes and case law.

## **THEORETICAL FRAMEWORK**

The paper dwells heavily on the religious market theory. This theory posits that religious firms (churches) provide religious products/services to consumers in an exchange process which takes place between religious actors comprising existing church members and religious window-shoppers on one hand, and religious organisations (churches) [represented by their pastors/prophets sic] on the other. The exchange process forms the principal operation in this market.<sup>15</sup> Here, churches supply the products/goods and services in the form of social, psychological, religious, emotional demands of religious actors. The religious actors rationally weigh up the costs and benefits of the choices available and pay for those that satisfy their needs. Of truth, the religious market exchange mechanism in Ghana reflects this exchange processes. For many of the churches, particularly the Pentecostals in Ghana, this presents business opportunities to explore because there are existing needs. The quest for fruit of the womb or the desire for a decent job can only find meaning in religion. This religious climate often leads desperate religious actors, mostly women, to seek help from these pastors/prophets. In the end, these religious actors are compelled to buy religious products or pay for religious services in the hope that their desires will be achieved.

## **HISTORY OF GHANA'S TAX LAW**

The earliest attempt to introduce direct tax in Ghana dates back to 1852 when the then Poll Tax Ordinance was introduced. The purpose of the Ordinance was to generate sufficient revenue to meet the rising cost of British Administration in Ghana. Each person, including even children under British protectorate were required by law to pay one shilling. However, the Poll Tax Ordinance failed mainly because it had a weak system of tax collection. Following the failure of the Poll Tax Ordinance, another attempt was made in 1931 to introduce direct tax but the tax bill was met with opposition and therefore it could not materialize. In 1943, the Income Tax Ordinance (ITO) [Cap 27] was introduced. Although home-made, Cap 27 was modelled after the Income Tax Act of the United Kingdom.<sup>16</sup> A principal feature of this Act was that it imposed tax on income with

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<sup>15</sup> Rodney Stark, & Roger Finke, *Acts of Faith: Explaining the Human Side of Religion*. Berkeley, CA: University of California Press, (2000):118-125.

<sup>16</sup> Benjamin Kunbuor, Abdallah Ali-Nakyee, and William Kofi Owusu Demitia, *Law of Taxation in Ghana*, (2<sup>nd</sup> ed.) Ghana: Type Publishers, (2017).

its source in Ghana only. Ten years thereafter, a new ordinance was introduced in 1953 following amendments to Cap 27. Nonetheless, the 1953 Ordinance was overthrown by the Income Tax Decree, 1966 (NLCD 78). This was followed by the Income Tax Decree, 1975 (SMCD 5). The SMCD 5 was the longest operative Income Tax Act having been in force for 25 years until it was repealed by the Internal Revenue Act, 2000 (Act 592). Currently, Ghana's tax system is based on the Income Tax Act, 2015 (Act 896) with its amendments.<sup>17</sup>

## **Ghana's Tax Regime**

Ghana's tax regime applies what may be termed as the *source and residence* rule.<sup>18</sup> The source rule implies the imposition of tax on income from a specified source or origin. Such sources may include but not limited to dividends, royalties and rent. Section 3(3) of Act 896, provides that the income of a person ... has a source in this country if the income accrues in or is derived from Ghana. Generally, all income arising thereto within Ghana's territory is liable to tax. Thus, once the income is earned in Ghana, it is subject to tax. In *Kubi v. Dali [1984-86] GLR 501, Holding 4*, Per Abban J.A, "the income tax laws of this country impose an obligation on all income earners of a certain category to pay taxes on their earnings" and that "the amount of damages awarded for loss of earnings should take into account the income tax which the plaintiff would have had to pay if he/she had continued to trade or work".

Until recently Ghana's income tax jurisdictional basis was hinged on the source being Ghana, that is, tax is imposed only on income having its source in Ghana and therefore foreign income if not brought into or received in Ghana cannot be subject to tax. In *Republic v. Commissioner of Income Tax Ex Parte Fynhout (1971)1 GLR 213*, Archer J.A. took the view that a non-resident company in Ghana which only buys timber and carries on the business of trade outside Ghana, could not be required to pay income tax. According to the learned judge, such an activity did not fall within the meaning of 'carrying on trade in Ghana'. In effect, it is only income earned in or accrued in or derived from Ghana or brought into Ghana or received in Ghana from wherever that is subject to tax. Nonetheless, under Act 896, the source of the income need not exist at the time of assessment. The relevant matter for consideration is that the income is traceable to a source.

The residence rule on the other hand determines tax liability on the basis of a person resident within the country. A resident person<sup>19</sup> may be required to pay tax on any income, investment or employment regardless of whether the source is in Ghana. Section 3(2) of Act 896 provides that "Any resident Ghanaian is liable to pay tax on income from employment, business or investments irrespective of the sources". The effect of section 3(2) is that even foreign income is liable to tax provided the income earner is resident in Ghana and whether or not the income is received or brought into Ghana. For non-resident persons, section 3(2) (b) provides that the *assessable income is the income of that person... to the extent to which that income has a source in this country and where the person has a Ghanaian permanent establishment income of the year connected with the permanent establishment, irrespective of the source of income*. In effect, if the

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<sup>17</sup> Benjamin Kunbuor, Abdallah Ali-Nakyea, and William Kofi Owusu Demitia, *Law of Taxation in Ghana*, (2<sup>nd</sup> ed.).

<sup>18</sup> Benjamin Kunbuor, Abdallah Ali-Nakyea, and William Kofi Owusu Demitia, *Law of Taxation in Ghana*, (2<sup>nd</sup> ed.).

<sup>19</sup> Section 101(1) defines a resident person to include a citizen without a permanent home outside who lives in that permanent home for one year, an individual present in the country for an aggregate of 183 days or more in any 12 months commencing and ending within that year, an employee or government official posted abroad for that year, a citizen who is temporary absent for not more than 365 continuous days but have a permanent home in Ghana.

person is not resident it is only the aspect of the income that is earned, or has accrued or derived from Ghana which is subject to tax. Therefore, for non-residents the source must necessarily be Ghana.

Consequently, Ghana through Act 896 now combines Ghanaian source rule for non-residents and a global source and approach rule for residents and permanent establishments as the basis of income tax liability. Thus with regards to resident persons, income tax is now based not on source in Ghana alone but global whether or not brought or received in Ghana whilst with non-residents it will only be taxed if the source is Ghana. This is a marked departure from previous enactments.

Tax may be imposed on income, capital gain and on expenditure. Since this paper focuses on incomes that accrue to the Church, we will dwell largely on income tax. Nonetheless, to place the discussion within the proper context, we shall attempt a definition of income in law. To ascertain what constitutes income, one must have regard to law and fact. Unfortunately, most tax statutes do not define income. Instead, they state what constitutes taxable income. In *Oxford Motors Ltd v Minister of National Income (1959) 18 DLR 2d Dominican Law Report 712* Per Abbot J., 'No one has ever been able to define income in terms sufficiently concrete to be of value for taxation purposes... where it has to be ascertained whether a gain is to be classified as an income gain or capital gain, the determination of that question must depend in large measure upon the particular facts of the particular case.' Therefore, the test adopted by the English Courts in determining what is meant by income is looking at: a. Income which is not capital and b. Treating capital as a tree and income as the fruit.

To determine what income is, one must thus draw a distinction between a sale of a fixed capital or asset of a business as against its circulating asset or capital. Capital assets are referred to as fixed capital or fixed assets and these are assets which relate to the permanent structures of the business. Those assets which are constantly being worked over (the fruits) are referred to as Circulating Capital. Those assets which form part of the permanent structure of the business and are the means whereby profits are made are regarded as the capital assets and therefore receipts of such assets are capital and cannot be taxed as income.<sup>20</sup> Thus, by law what constitutes income implies whether or not the receipt is for loss of a permanent assets (Capital) or in lieu of trading profits (Income) as was established in *Able UK Ltd v. HRMC [2007] EWCA Civ. 1207*. In *Van den Berghs Ltd V. Clark 1935 AC 431*-the applicant Company entered into an agreement with a rival Dutch Company which provided for sharing of profits of their respective magazine business in specified proportions and the creation of joint arrangements as to price and markets. Following a dispute, the agreement was terminated and the Dutch Company paid a sum of money to the applicant company to compensate it for the cancellation of its future rights. It was held that the sum in question was for the cancellation of the Company's future rights under an agreement which constituted a capital asset and therefore the sum was a capital receipt and therefore not taxable.

In contrast, in *Kelsall Parsons Co v. IRC [1938] 21 TC 608 at 621*, a firm of manufacturers' agents received compensations for the termination at the end of the second year of a three (3) year agency agreement. The issue was whether the compensation received was income or capital. It was held that the compensation was a trading receipt and therefore the income was taxable. In essence, the modern approach is that, whilst the distinction as to capital and income is relevant,

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<sup>20</sup> Benjamin Kunbuor, Abdallah Ali-Nakyeya, and William Kofi Owusu Demitia, *Law of Taxation in Ghana*, (2<sup>nd</sup> ed.).

one must also be guided by the Statute in question and the facts of the case. The net effect is that a legal definition of income may be greeted with much uncertainties as one cannot predict what the court may classify as income. Essentially, what may constitute income subject to tax in United Kingdom may be different from what is income subject to tax in Ghana having regard to the statute and facts of each case.

In Ghana, for an income to be subject to tax, it must be shown that the income is derived from *employment, business, (trade, profession or vocation) or investment* as provided for under section 2.1 of Act 896. Section 133 of Act 896 defines business to include *a trade, profession, vocation or isolated arrangement with a business character and a past, present or prospective business but excludes employment. Any activity therefore of a commercial nature of the past, present or future, for which a person earns an income other than from employment or investment is therefore a business and this includes engaging in a trade, practicing a profession, and or a vocation* (emphasis added). To determine income from business under Ghanaian law therefore, regard must be had to what constitutes trade, profession, and vocation.

The ordinary dictionary defines 'trade' as shop keeping, commerce, buying or selling (20th Edition of Chambers Dictionary). Under U.K tax law, *trade* has been defined to include "every trade, manufacture, adventure or concern in the nature of a trade" as was affirmed in *Griffiths v. Harrison Ltd. 1963 AC 1*. With individuals, trade includes a profession and vocation unlike artificial persons such as companies or corporations. It is however settled under English law that, whilst trade has no precise definition in law, for a tax payer to be held to be trading, certain features must exist. The tax payer firstly, must have adopted commercial methods and secondly the activity must have been repetitive, regular or continuously carried on. Thus whether or not a person is trading and subject to tax is therefore a question of law and fact. In *Ransom v. Higgs [1974] 3 All ER 964*, Lord Wilberforce intimated thus 'trade normally involves the exchange of goods or services for reward...there must be something which the trade offers by way of business. Trade moreover presupposes a customer.' Similarly, in *Pickford vs. Quirke [1927] 13 T.C. 251* Roland J. remarked that "it is very well known that one transaction of buying and selling a thing does not make a man a trader, but if it is repeated and becomes systematic then he becomes a trader and the profits of the transaction are not taxable so long as they remain isolated but becomes taxable as items of trade as a whole". Nonetheless, under English law, for an isolated transaction (once a while transaction) to be subject to tax, it must be established that there is a profit motive and that the transaction is recurrent. Under Ghanaian law however trade does not include isolated transactions and profits made therefrom are not taxable generally unless it is of a business character, i.e. with a profit motive. As provided for under section 133.

As stated by Jesse M.R. in *Erichsen vs. Last [1881] 8 QBD 414 at 418*, there is no principle of law which lays down what the carrying on of trade is. It is a multiple of things which together make the carrying on of trade. These multiple of things, known as the *badges of trade*, are matters which the Courts take into consideration in determining whether or not a particular transaction is trade. In the subsequent paragraphs, we shall consider some of these matters.

In determining whether or not a transaction constitutes trade, the court considers the nature of the Commodity involved or the subject matter of the transaction. Commodities which are normally the subject of trading are always regarded as being bought for the purpose of trade. Thus property which yields to his owner neither income nor personal enjoyment merely by the nature of ownership is likely to be the subject matter of a trading transaction. The decision in *Rutledge v.*

*IRC [1929]14 TC 490* provides some guidance. In that case Rutledge was a businessman in the film industry in UK. He travelled to Berlin and purchased 1million toilet rolls for 1000 pounds and resold it in UK at a profit of 11,000 pounds. He was held to have carried on trade and therefore the profit was taxable on the basis that the quantity shows an intention of resale.

In addition, the court would equally give consideration to length of ownership of the property. The period between the acquisition of the property and its sale can determine whether the property was acquired with an intention of reselling for trading purposes. If there is a long time lapse between the date of purchase and the date of resale it will negative the finding of a trade and vice versa. Thus a quick sale is more consistent with trading than something kept for the long term. This is however rebuttable as a special reason may account for the quick sale (*Wisdom v. Chamberlain [1969] 1 All ER 332*). As indicated above, repetitive transactions of the same subject matter is an indication of trade.

Moreover, whether or not the tax payer has made alterations to the property acquired in order to make it more marketable or whether he had set up an organization to sell the property is evidence of trade. In *Cape Brandy Syndicate v. IRC [1921]2KB 403* ABC engaged in wine trade formed a syndicate and purchased 3000 pounds worth casks of Cape Brandy and they blended with French Brandy, recasked and sold in lots over an 18-month period. They were held to be trading.

The circumstances surrounding the sale or the realization of the income may equally be a factor as to trade or not. Forced sales to raise money for emergencies raise a presumption that such transactions are not trade. Sales by executors in the course of winding up of a deceased estate or by liquidators and receivers of insolvent company and forced sales in the case of auctions to satisfy judgment debts are some of such examples.<sup>21</sup>

The court also takes into account the motive of the transaction. Where therefore a transaction is undertaken to realize a profit it amounts to trading. However, the absence of a profit motive is not indicative of a commercial transaction amounting to trade neither is the fact that an asset purchased with the ultimate intention of resale at a profit will itself lead to a finding of trade. Other elements must be present. Again, where money is borrowed to finance the transaction a strong but rebuttable presumption of trade is implied. Thus, to determine that a particular transaction constitutes trade one or more of the factors must be present.

Having dealt extensively with trade, we now turn attention to discuss what constitutes a profession and vocation. Profession was defined in *IRC v. Matse [1919] 1 K.B* per Scrutton L. J. as the 'idea of an occupation requiring either purely intellectual skill or manual skill controlled by the intellectual skill of the operator'. Thus, whether or not a person is carrying on a profession is a matter of law and fact. Additionally, there must be some element of continuity with the profession. The question that arises is, what standard of intellectual skill or manual skill or specific education should a person have to qualify as a professional? The authorities lean very heavily in favour of people with formal education. In *Hugh Cecil v. IRC [1919] 36 TLR 164* the issue was whether or not Mr. Cecil a photographer could be said to be carrying on a profession. It was considered by the IRC that Mr. Cecil was a photographer of great merit, individuality and artistic conception but because he had no formal education, it was held that he was a non-professional, that is, he was not carrying on a profession to be taxed as such.

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<sup>21</sup> *Cohan's Executors v. IRC [1924] 131 LT 377*



Vocation has proven difficult to define. However, Lord Denman in *Partridge v. Mallandaine* [1886] 18 QBD 276 defined vocation as ‘...the way in which a man passes his life’. According to the learned judge, “vocation is analogous to the word calling”. Persons engaged in vocation such as pastors, doctors, nurses and others are expected to carry on their work with dedication without worrying about salaries but for tax purposes this is not so. Lord Denman held in this case that a man who accepted bets was carrying on an organized vocation. What then is income from business under Ghana Law? By section 5.1 of Act 896, the income of a person from a business for a year of assessment is the gains and profits of that person from that business for the year or part of the year. Section 5.2 requires that in ascertaining the gains and profits of that person or another person from a business for a year of assessment, the Commissioner must take into consideration all but not limited to the following: Service fees (consultation fees for our purpose), consideration received in respect of trading stock (for our purpose; sales from religious items such as anointing oil, church paraphernalia and many others), a gift received by the person in respect of the business (for our purpose; money, other movable and immovable properties given as gifts to pastors), an amount derived that is effectively connected with the business and that would otherwise be included in calculating the income of the person from investment. In what follows hereafter, we shall establish whether or not there is sufficient ground to require churches, and even to some extent pastors to pay taxes. Could pastors be deemed to be carrying on a profession or a vocation which is subject to tax?

## **RESULTS**

As has already been indicated in the methodology, data was produced from four Pentecostal/Charismatic churches and four orthodox churches. The Pentecostal/Charismatic churches were House of Prayer for All Nations (Cape Coast), International God’s Way Church, Ebenezer Miracle Worship Centre, and Run for Your Life Ministry, all in Kumasi. The orthodox churches included the Roman Catholic Church, Takoradi, the Presbyterian Church, the Methodist Church, and the Anglican Church, all in Cape Coast. The research questions sought to gather some biographical data on respondents, particularly pastors; i.e. age, educated or not and whether called into the prophetic, healing or teaching ministry. However, for confidentiality purposes, we employ pseudonyms as a means to identify our respondents. In the main, we discovered that majority of the Pentecostal/charismatic pastors are less educated as compared to their counterparts in the orthodox churches who spend considerable time schooling. In all, there were three principal questions that formed the basis for conversation with our respondents. These were: *Is the church engaged in any form of business? What is the nature of the business? Does the Church pay tax on the income accruing therefrom?*

In response to the first question, the Pentecostal/charismatic churches denied engagement in any business venture. It was evident from the responses, however, that the core mandate of the church in bringing salvation to the lost was much alive in the orthodox churches than it is in the Pentecostal/charismatic churches. The Pentecostal/charismatic churches focused on what may be termed as the ‘prosperity gospel’ which is aimed at bringing hope to the hopeless in society. For these Pentecostal/charismatic churches, freedom from demonic attacks, fertility of humans, promotion at the work place is to be interpreted within the broad spectrum of salvation. Therefore, anybody who worked to prevent the attainment of a person’s well-being is an enemy and must be dealt with. But Christians must take practical steps to frustrate the works of the enemy by any

means possible. One of the means to deal with the enemy is reliance on religious products such as anointing oil, anointed salt, water from the well (*aburamu nsuo*), among others.

At International God's Way Church, childless couples are given toffees popularly called 'baby toffees' to be eaten after which they meet the pastor to offer an offertory in his office. The couple is also required to buy anointing oil. There were other products such as handkerchiefs, stickers, plastic bottled water, bangles, and T-Shirts which were on sale for those who desired other miracles. There were also 'special sessions' where pastors/prophets consulted with clients (religious actors) at a fee. However, the religious items, according to the pastor/prophets informants, must be accepted in faith for them to be supernaturally efficacious – remedying the required or expected physical or spiritual problem. The oil, for instance, comes in smaller and bigger bottles with their respective price tags.<sup>22</sup>

At Ebenezer Miracle Worship Centre in Kumasi, we also discovered the *ɔpata ko agye ko abɔwobo* (literally, separator of fight and collector of fight) and *dadie bi twa dadie* (literally iron cuts iron) as two types of anointing oil which have gained prominence among religious actors. These types of oil are believed to have the power to enhance businesses, protect and resist attacks from malevolent spirits, provide favour, and render success to users.<sup>23</sup> Besides these religious items, one could also have *personal meeting* with the pastor/prophet at a fee. In a study conducted at Ebenezer Miracle Worship Centre, Kumasi, George Anderson Jnr<sup>24</sup> reported that an attractive offertory of about US \$ 125 (GH ₵500) and more attracted two bigger bottles of anointing oil and two eggs and a personal meeting with Ebenezer Adarkwa Yiadom. However, a twenty (GH ₵20) special offertory only attracts two smaller bottles of anointing oil without any personal meeting with the pastor. This implies that the amount of money that is paid determines the kind of religious products/service one receives.

At House of Prayer for All Nations we discovered the 'back to sender' anointing oil with a special price tag. It is used for spiritual protection and dissolution of attacks from malevolent spirits. Many of the respondents alluded to these types of oil and the type of ailments and problems they address. Felicia, Herty and Esi for instance, indicated that their predicaments necessitated that they met the 'Prophet One' (founder of the church). After meeting with the prophet, they were told to buy *ɔpata ko agye ko abɔwobo* anointing oil at a cost of US \$ 250 (GH ₵1000).<sup>25</sup> In House of Prayer for All Nations, Grace shared her testimony about how she had suffered from a perennial stomach ache. She visited the hospital and some churches in search for a cure. However, all her efforts proved futile. Upon meeting the head pastor of House of Prayer for All Nations, she was advised to buy the 'back to sender' anointing oil for US \$5 (GH ₵20). According to her, she bought the oil and was given *akwankyerɛ* (guidance) on how to use it and at what time and day. Grace intimated that after she has meticulously followed the prophetic guidance, she has not ever felt the stomach ache again.<sup>26</sup> Besides these specifics, we discovered that the sale of anointing oil, anointed salt, hand-fans, necklaces, hand bangles, eggs, calendars, and stickers was common to all the Pentecostal/charismatic churches. For the orthodox churches, with the exception of anointing oil, anointed salt and eggs, the rest of the religious products listed above were equally

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<sup>22</sup> Jonathan E. T. Kuwornu-Adjaottor, *Contemporary Prophetism in Kumasi*, 62–68.

<sup>23</sup> George Anderson Jnr., *Commercialization of Religion in Neo-Prophetic Pentecostal/Charismatic Churches in Ghana*, 5.

<sup>24</sup> George Anderson Jnr., *Commercialization of Religion in Neo-Prophetic Pentecostal/Charismatic Churches in Ghana*, 5.

<sup>25</sup> Interview with Felicia, Herty and Esi at, Ebenezer Miracle Worship Centre, Kumasi, November 19, 2017.

<sup>26</sup> Interview with Grace at, House of Prayer for All Nations, Cape Coast, May 25, 2016.

common to them. We noted that most of the religious items have been embossed with the pictures of pastors/prophets or General Overseer of the respective churches.

According to the pastors of these churches, the religious items were prepared under divine instructions and guidance, and consecrated through fervent prayers to address the spiritual and social needs of religious actors such as cure for HIV/AIDS, hepatitis, cancer, birth complications, spiritual marriage, bareness, blindness, broken marriages, rejection by family members who live in abroad, and challenges faced in trying to secure a visa.<sup>27</sup>

It would appear that an important tool in the hands of these pastors/prophets is the 'fear technique'. The pastors/prophets and elders emphasised the idea of constant spiritual battle by the enemy, (*ɔtamfo*) against humans. These spirits oppose human progress, success and wellbeing. Ronald Enroth contends that the religious worldview about the belief in malevolent spirits as the cause of death, misfortunes and other ills by Pentecostals induces 'fear' in their congregants or religious consumers. Plutarch buttresses Enroth's observation by taking a broader look at fear or anxiety factor within the context of superstition.<sup>28</sup> What is unique about Plutarch's analysis is that he does not apply the term "superstition" in isolation, but with two collateral indexes.<sup>29</sup> He shows that religious "doing" occurs as a continuum on a scale that runs from "atheism" on one end of the extreme, to "superstition" on the other end. On the pole of superstition, religious patronage is high as compared to the pole of atheism. The high patronage of religion is attributable to the factor of fear - the predominant tool in the regulation of religious behaviour. In Ghana, religious actors believe that they actually have physical or material problem that only a man of God can solve. Admittedly, such beliefs are also induced by Pentecostal Christianity which always teaches that evil spirits are the cause of people's problems. Assessing the socio-economic role of Pentecostal Christianity in Africa, Paul Gifford concurs that Pentecostal beliefs in spiritual warfare and prosperity do not only undermine social capital, but also diminish personal agency, and discount scientific rationality. For Gifford, this brand of Christianity is anti-development and that its beliefs and practices are 'dysfunctional'.<sup>30</sup>

One can infer from the data that even though the Pentecostal/charismatic churches deny involvement in any business venture, in practice religious actors pay for the religious products/services they obtain. This is in tandem with the religious market theory which states that any time an exchange process takes place, rewards in the form of religious products are given to rational actors while the latter also offer money to the religious organisation. Whichever, way one looks at the phenomenon, it appears that some income accrues to these churches in respect of the sale of these religious products. In what follows, we shall establish whether or not such income must be subject to tax in accordance with law.

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<sup>27</sup> Interview with all the Head Pastors/Prophets, and Elders in all the four churches, May 25, 2016; July 23, 2017; November 19, 2017; December 26, 2017)

<sup>28</sup> Frank Cole Babbitt, (Ed. and Trans. in English). *Plutarch's Moralia*, vol. VI, London: Cambridge Mass, (1938).

<sup>29</sup> Simon Kofi Appiah, *Ethics of Religion in Health Care*.

<sup>30</sup> Paul Gifford, *Christianity, Development and Modernity in Africa*.

## DISCUSSION

Having regard to section 3(3) of Act 896 and being guided by the decision in *Kubi v Dali* (supra), it is settled that the income earned through the sale of these religious products and services has its source in Ghana and must be subject to tax. We have already established that by law what constitutes income implies whether or not the receipt is for loss of a permanent asset (Capital) or in lieu of trading profits (Income). But what type of income is this? Is it income from business as in trade, profession or vocation? By offering to religious actors, items such as anointing oil, handkerchiefs, anointed salt, calendars, bottled water and others, could the church be said to be trading? Where do we place the church's act of maintaining a rubber plantation or operating a hostel facility, a business as in trade or merely a patriotic act aimed at contributing to the export earnings of the state or easing the burden on government to provide accommodation facilities at the tertiary level respectively?

Elsewhere in this paper and in reliance on section 2.1 of Act 896, the position of the law has been stated that in Ghana for an income to be subject to tax it must be shown that the income is derived from *employment, business, (trade, profession or vocation) or investment*. Business has been defined by section 133 of Act 896 to include *a trade, profession, vocation or isolated arrangement with a business character and a past, present or prospective business but excludes employment*. Any activity therefore of a commercial nature of the past, present or future, for which a person earns an income other than from employment or investment is therefore a business and this includes engaging in *a trade, practicing a profession, and or a vocation* (emphasis added). Trade has been defined as shop keeping, commerce, buying or selling (20th Edition of Chambers Dictionary). In *Ransom v. Higgs* (supra) Lord Wilberforce intimated thus '*trade normally involves the exchange of goods or services for reward...there must be something which the trade offers by way of business. Trade moreover presupposes a customer.*' In relating this to the data produced, it is safe to conclude that the act of buying anointing oil or salt and selling same to religious actors at a price above the purchasing price, constitutes trade because there is a profit motive. We discovered that most of the churches buy, for instance, anointing oil from the ordinary market and re-package them into different containers with embossed pictures of the pastors/prophets. As was held in *Cape Brandy Syndicate v. IRC [1921]2KB 403* ABC engaged in wine trade, formed a syndicate and purchased 3000 pounds worth casks of Cape Brandy which they blended with French Brandy, recasked and sold in lots over an 18-month period. The court held that they were trading.

The point has also been made that for a tax payer to be held to be trading, certain features must exist. The tax payer firstly, must have adopted commercial methods and secondly the activity must have been repetitive, regular or continuously carried on. The adopted commercial method in these churches particularly the Pentecostal/charismatic churches, is the fear factor which is induced in religious actors to the effect that a certain personality is responsible for their misfortunes and further getting the vulnerable religious actors to come to the point of accepting that the salvation could only be found in an ordinary oil prayed over. Moreover, these activities are repetitive which satisfies the second feature which must exist for an activity to be held to be trade. We discovered that, to sustain the transaction, many of the churches employed the services of artisans who prepared the products for sale.

We maintain also that for individuals, trade includes a profession or vocation. With guidance from Scrutton L. J. in *IRC v Matse* (supra), a profession is an occupation which requires intellectual or

manual skill controlled by intellectual skill of the operator. In effect the operator must have formal education. As indicated earlier, it was discovered that majority of the Pentecostal/charismatic pastors are less educated as compared to their counterparts in the orthodox churches who have received considerable training as ministers of the Gospel. Therefore, having regard to Lord Scrutton's guidance in *IRC v Matse*, (supra) one may conclude that only pastors from the orthodox churches could be said to be carrying on a profession. Therefore, whatever that is earned by way of carrying on the profession of a reverend minister must be subject to tax because it is income. Nonetheless, with the definition of vocation, it does not appear that Pentecostal/charismatic pastors are completely left off the tax hook. In *Partridge v. Mallandaine* (supra) Lord Denman defined vocation as being "analogous to the word calling". He held that persons engaged in vocation such as pastors, doctors, nurses and others are expected to carry on their work with dedication without worrying about salaries but for tax purposes this is not so. Many of the pastors/prophets we interviewed claimed that they felt called by God to establish a church. In our view, the absence of formal education in the case of Pentecostal/charismatic pastors places the transaction properly under vocation. In effect, whatever income that is earned thereto must be subject to tax.

Additionally, section 5.2 requires that *in ascertaining the gains and profits of that person or another person from a business for a year of assessment*, the Commissioner must take into consideration the service fees (consultation fees for our purpose), consideration received in respect of trading stock (for our purpose; sales from religious items such as anointing oil, church paraphernalia and others), a gift received by the person in respect of the business (for our purpose; money, other movable and immovable properties given as gifts to pastors), an amount derived that is effectively connected with the business and that would otherwise be included in calculating the income of the person from investment. These Pentecostal/charismatic pastors take consultation fees in addition to income realized from the sale of religious products. Some pastors also confirmed that there have been occasions where pastors have received gifts in the form of chattels and immovable properties. We are of the considered opinion that if any of these gifts is sold and some profits realized, the income must be subject to tax.

## **CONCLUSION**

In the main, this paper has argued that there is legal basis for requiring the church to pay tax. Thus to the extent that the church is engaged in buying and selling of religious products, the income accruing thereto must be subject to tax. Anointing oil, anointed salt, necklaces, bangles and calendars which are offered to religious actors in exchange for money is, in the eye of the law, trade and the Commissioner of Income Tax has locus to demand tax from the church. Similarly, the orthodox churches which have established business such as maintaining rubber plantation and hostel facilities must do the needful; that is if they are not already doing that. The paper also considers it appropriate to require pastors/prophets to pay tax on whatever their profession or vocation earns for them as income either through gifts or service fees. Asking the church to pay tax on income is fit and proper. After all Christ, a model for the church, in responding to the question whether it was right to pay tax to Caesar, instructed in Mark 12:17 as follows: *Give to Caesar what belongs to Caesar, and give to God what belongs to God.*"

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