

Pension Privatization in Africa: The Coercive Power of an Idea and the Politics of Retirement Income Security Reforms in Ghana and Nigeria

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Abstract

Why did Ghana and Nigeria as latecomers in social security reforms adopt private pension systems when they (a) have limited formal sector labour force to contribute to private pension fund, (b) lacked the necessary capital market for the investment of worker's retirement contributions, and (c) lacked the administrative capacity required of a political system to be able to enforce contributions and investment regulations? And why did the two countries differ in terms of the overall institutional arrangement of their new pension system although they were confronted with similar policy challenges, and share similar policy legacies? Existing explanations for privatization of social security in Latin America and Central and Eastern Europe show the World Bank and a coalition of other global actors were directly involved in the decision to privatize social security in countries in the two regions. However recent analysis of similar reforms in Nigeria and Ghana show that the World Bank-led coalition did not play any direct or active role in pension reforms in both countries. This paper argues that policy makers in Ghana and Nigeria adopted private sector solutions without the Bank's direct involvement because privatization as an idea and a policy instrument which the Bank helped to reconstruct since the 1980s had become a global norm, the adoption of which is thought to enhance a countries' legitimacy, acceptability and investment favorability among the comity of countries. The analysis shows that differences in how private sector solutions were applied in these two countries were driven by domestic politics. In particular, more democratic deliberation led to non-replacement of pay-as-you-go (PAYGO) in Ghana versus replacement in Nigeria. Better governance in Ghana had the same effect.

Keywords: Pension, Social Security, Privatization, Ghana, Nigeria, Africa, Ideas

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Introduction

Existing explanations for privatization of social security in Latin America, and Central and Eastern Europe show the World Bank and a coalition of other global actors were directly involved in the decision to privatize social security in countries in the two regions (Brooks 2002, 2004, 2005, 2006, 2007; Merrien 2001; Muller 1999, 2002, 2003; Orenstein 2003, 2005, 2008). Recent analysis of similar reforms in Nigeria (Casey and Dostal 2008) and Ghana (Kpessa 2009) however show that the Bank led coalition did not play any direct or active role in pension reforms in both countries. This is puzzling given that transnational actors are usually perceived to be more influential in aid-dependent countries especially (Deacon 2007; Olukoshi 2000, 2007; Brooks 2004, 2005; Madrid 2005). But social security privatization in both Ghana and Nigeria is more puzzling because both countries (a) have limited formal sector labour force to contribute to private pension fund, (b) lacked the necessary capital market for the investment of workers' retirement contributions, and (c) lacked the administrative capacity required of a political system to be able to enforce contributions and investment regulations. How do we explain this phenomenon? And how do we explain the divergent paths chosen by Ghana and Nigeria in the way private sector solutions was applied in their pension reforms?

This paper argues that policy makers in Ghana and Nigeria adopted private sector solutions without the World Bank's direct involvement because privatization as an idea and a policy instrument which it helped to construct since the 1980s had become a global norm, the adoption of which is thought to enhance a country's legitimacy, acceptability and investment favorability among the comity of countries. Policy makers in both countries were part of a global community of policy actors that included the World Bank and other transnational actors interacting around privatization as a policy instrument long before it was applied to the social security in both countries. Thus, while the World Bank shaped the general ideological climate and knowledge environment

around pension reforms, it had no direct involvement in pension reform in Ghana and Nigeria. I show that difference in how private sector solution was applied in these two countries was driven by domestic politics. In particular, more democratic deliberation led to non-replacement of PAYGO in Ghana versus replacement in Nigeria. Better governance in Ghana had the same effect. And in both countries, a domestic political climate in favor of privatization which was cultivated since the 1980s but not specifically in the area of pension reform, shaped the cognitive position of policy makers in both countries to embrace private sector solutions without direct intervention of World Bank or other transnational actors⁹.

The rest of the paper is organized into six sections. Since the paper argues that social security privatization in the two countries can best be explained through a study of prevailing global norms, the first section provides an analysis of the construction of privatization as a global norm against which policy makers measure not only their responses to policy challenges but also their countries' conformity with what was deemed appropriate. Sections two and three provide an analysis of the institutional setting and the pension reference processes in Nigeria and Ghana respectively. Section five presents a comparative assessment of why the application of private sector solutions to pension reforms in these two countries differ in the final policy choices made. The paper concludes by arguing for the need to pay close attention to sociological and ideational dimensions of global social policy, and the extent to which policy-oriented interactions shape the cognitive beliefs of major actors.

The Construction of Privatization as a Policy Idea

Privatization emerged as the most dominant policy instrument for solving public and social policy problems in various countries across the world since the 1980s. As an idea, privatization is not new; it has been leaking in policy circles for centuries (Raplay 2002). In fact in sub-Saharan African countries, versions of private social security schemes known as provident funds were introduced in years immediately following independence as a strategic social policy tool (Adésinà 2009; Kwon, Mkandawire, and Palme 2009; Mkandawire 2001; Kpessa 2011) for generating domestic resources for economic development. Privatization, however, became prominent, and pervasive especially in the last quarter of the 20th century. The collapse of state led approach to public policy and welfare service delivery paved the way for private sector solutions to emerge as alternative policy instruments. While in the developed world, this collapse is framed in the broader discourse of "crisis of the welfare state," in developing countries, it was situated within what was considered weaknesses of the post-colonial bureaucracies.

This perceived bureaucratic weaknesses paved the way for the search for alternatives policy of governance and service delivery. This search involved the construction and or revival of existing but previously less favoured ideas. As other argued in this search for alternatives, actors are more likely to gravitate towards ideas or structures that they already know but have been consigned to the margins of policy discourse (Katagiri 1992). Because policy change is often resisted by constituencies most affected, the gravitation to alternative ideas—in this case privatization—is never without opposition. However because the expression of ideas in a discursive process has the power to transform interests and realign policy preferences of major actors over time, individuals and institutions who were initially opposed to privatization both as a program and a policy idea, began to relax their opposition and resistance, and ultimately embrace the policy. Although this kind of shift in policy preference may be driven by material interests, it is important to note that interests are not fixed, rather they are often constructed by people on the basis of how they interpret their material environment (Hay 2004). The process of interpreting material circumstances by actors in any given policy area is often influenced by the dominant discursive frame of that policy (Schmidt, 2002). The major ideas at the foreground and background of the policy discourse are very important in understanding shifts in actors' perspectives and changes in policies. As such, in any political discourse, actors struggle to convince their opponents through debates, persuasion, cajoling and reasoned arguments that their particular definition of policy problems and preferred options for reform are the most reasonable (Risse 2004). In this type of discursive environment, actors with resources and persuasive abilities are able to dislodge opposition to their policy options. And when the ideas of such actors gained currency, they do not only open the political space for new actors in the policy process, they also become the dominant lens through which policy problems are defined, and their solutions framed. Over time, actors who originally opposed the ideas that prevailed in the discursive process adjust their interest and accommodate these ideas they had hitherto opposed. Thus, policy ideas that often become dominant are those that are advanced and repeated overtime in ways that eventually make them appeal to "our intuitions, and instincts, to our values and our desires, as well as to

⁹ To be sure, although this article asserts that domestic socio-political forces were the main driving force for the privatization of social security in Ghana and Nigeria, it does not suggest the non-existence of some indirect influence from the global actors. If for nothing at all, they were active in repositioning privatization in the foreground of policy discourse in both countries. This notwithstanding, data from both national context suggests that the decision to undertake full and partial privatization in Nigeria and Ghana respectively were driven by domestic socio-economic and political considerations.

the possibilities inherent in the social world we inhabit,” and become “so embedded in common sense” that we do not only take them for granted, but accept them without much questions (Harvey 2005, p. 5).

All over the world especially in the last quarter of the twentieth century and the early years of the twenty-first century, privatization as an idea constituted the frame through which most policy actors define the world around them. This is precisely because it prevailed and has become the dominant ideational lens through which policy makers see the world around them. Even the labour unions and social democratic parties that were originally opposed to the idea of private sector solutions to what were perceived as public sector problems have gradually realigned their policy preference to accommodate private sector solutions. Thus, rather than seeing the spread of privatization as a phenomenon that solely involved direct ‘tutoring’ of domestic actors by transnational actors, it is important to pay attention to broader policy-oriented interactions and how the ideas that gained currency in such discursive processes shape the actual policy making processes in domestic settings.

Sociologists and more recently constructivists have drawn attention to what were perceived as growing global political norms (Finnemore and Sikkink 1998; Klotz 1995). Such norms are widely shared consensus on the appropriate societal goals (economic growth, social justice) and the means (competition and cooperation) for achieving them (Meyer and Hannan 1979). Others argue that the widely shared beliefs about the appropriate ends as well as the means through which they could legitimately be achieved are constructed (Berger and Luckmann 1966; Meyer et al. 1997) primarily through social interaction among major actors (Finnemore and Sikkink 1998; Klotz 1995; Risse 2000; Risse 2004). Wendt (1999) for instance, argued, that the “structures of human association are determined primarily by shared ideas...., and (2) the identities and interests of purposive actors are constructed by these shared ideas rather than given by nature”(p.1). Repeated interactions between and among transnational and domestic actors are the means by which such shared meanings or what come to constitute a global norm are created. These interactions involved persuasions, contestations, arguments, explanations, debates and protests.

The idea here is that repeated interaction and shared socialization among policy makers at different levels in the world can result in the production of shared norms that eventually defines what is seen as acceptable behaviour for actors with a given interest and identity (Finnemore and Sikkink 1998). The emergence of shared norms, therefore, permits actors to have common understanding of what are deemed appropriate policy instruments for any given problems (Wendt 1994; Braun and Gilardi 2006). In other words, the social world is made of human beings, who in turn make everything in it. The fact that human beings construct much of what we know of the world makes the things they make intelligible to them.

The process of repeated interaction, in this case around privatization became a social structure, and the idea of privatization became a norm, and the subjective meanings held by various actors became inter-subjective (Finnemore and Sikkink 1998; Klotz 1995). As a social structure, repeated interactions involve a collective relationship that fosters exchange of ideas and learning at both ends—transnational and domestic—with the actors involved consciously and unconsciously open to updating their causal beliefs as and when necessary or when such beliefs are challenged by empirical reality. Interaction as a social structure is defined in part by “shared understandings, expectations or knowledge” which “constitute the actors in a situation and the nature of their relationships, whether cooperative or conflictual” (Wendt 1995, p. 73). Policy actors often engaged in interactions at various levels including conference, seminars, workshops (Finnemore 1996; Finnemore and Sikkink 1998), and other recent platforms made possible through the advances in technology.

What this means is that policy-oriented interaction among actors cannot be deemed a mere talk. It is a process of reality construction that encompasses ideas about public policy problems and solutions among major policy actors and with the broader society. What policy-oriented interaction did therefore was to offer platforms through which cognitive arguments about the necessity and logic of appropriateness of private sector solutions were expressed and debated. But beyond being a medium for ideas to flourish, policy-oriented interaction is also a process through which major actors especially those who are committed to promoting privatization coordinate its construction and communication with the general public (Schmidt 2003, 2010). It is also the process through which policy actors learn from each other’s experience and update their causal beliefs and preferences. Consequently, by the mid 1990s, the values and normative assumptions associated with the idea of privatization positioned it at the center of policy discourses in ways that helped to construct new policies and institutions, and the behaviours of actors associated with them. The emergence of common norms, in this sense, permits actors to have shared understanding of what are deemed appropriate policy instruments for any given problems (Braun and Gilardi 2006). This however does not mean a race towards convergence. As the empirical analyses show, the adaptation of global policy ideas in national environments are often mediated or filtered by domestic factors. Thus, although policy goals of actors across different national jurisdiction may be similar, the design of policy instruments may differ due to cross-national and institutional differences.

The ideational explanations above should not be taken to mean actors always subordinate their material interest to a blind pursuit of norms. Specifically in the case of privatization, ideational and material factors can be

seen as mutually re-enforcing. In fact ideational factors and material interests are not necessarily in opposition to each other. Ideationally, the adoption of privatization across different national jurisdictions can be explained as an attempt by policy makers to gain international recognition and legitimacy by emulating what has become a widely accepted practices (Weyland 2005). Governments generally fear being stigmatised by their peers and other actors as 'backward' hence they adopt global norms sometimes regardless of functional needs. The desire to gain acceptability and legitimacy among their peers and the aspiration to impress global public opinion in part explains the decision of some policy makers to privatize social security schemes. The reason domestic policy actors sometimes adopt policies that do not make any sense in their specific policy environment is because of a desire to present their countries as acting in the proper and sufficient manner to conform to a prevailing norm (Meyer and Hannan 1979).

Global norms are defined as a "set of fundamental principles, and models, mainly ontological and cognitive in character, defining the nature and purpose of social actors and action", often embedded in social institutions by means of shared understanding (Boli and Thomas 1997, p. 172). Therefore states, markets, bureaucracies, non-state actors, transnational institutions, policies, programs are all situated in cultural models in the nature of things that define their purpose of action. The culture of any policy or programs defines what its purpose is, and how actors should pursue that policy, how actors perceive themselves, and how they are ultimately defined. Global norms do not only provide social identity frames of appropriate behaviour, they also serve as the lenses through which collective identities of states, firms, schools, churches, factories, as well as, the rational bureaucratic or organizational forms they adopt in their operations are defined (Meyer 1987; Meyer, Boli, and Thomas 1987). Domestic politics and institutional settings may obstruct and often refract the adoption of travelling policy ideas, nonetheless, actors often find ways to navigate domestic obstacles (Sewell 1992).

Consequently, privatization of social security across different jurisdictions in the world is an indication that actors, irrespective of their locale, are essentially similar in nature, using similar strategies, to pursue similar objectives because the normative principles around which social security privatization were designed are cognitively and ontologically shared across different national settings (Boli and Thomas 1997). The global spread of privatization is reflected in the unanimity and widely accepted definitions, principles, and objectives everywhere in the world. Just as there is a common understanding of what institutions like schools, hospitals, legislatures, universities; and programs or policies like retirement, pension, healthcare mean to people everywhere, so too has privatization come to constitute the identity and interest of actors at different levels. Social security privatization thus, spread quickly across nations, not because it was imposed by transnational actors, but because privatization as an idea and a policy instrument has come to constitute not only the frame through which policy makers define problems and solutions but also a means to improve their international reputation (Berry and Berry 1992; Gray 1973; Mintrom 1997; Simmons and Elkins 2004; Walker 1969). In both Ghana and Nigeria the decision to adopt versions of private social security schemes were driven more by a desire to conform to a prevailing global trend rather than an overall goodness of fit of the policy with the domestic environment. Thus, the empirical analyses that follow must be understood against the background that like most countries, both Ghana and Nigeria are part of a global policy discursive and processes where privatization is the dominant policy idea and instrument since the 1980s (Olukoshi, 2007).

Social Security Privatization Process in Nigeria

Nigeria inherited an unfunded non-contributory defined benefit public pension program known as CAP 30 from the British colonial administration. This program, which was designed to reward loyal service in the colonial administration, and was solely for public servants especially those who work in the colonial public service (Orifowomo 2006). Later in the 1960s (after independence), Nigerian policy makers established defined contribution plan known as provident funds for private sector workers and other employees who were excluded from earlier retirement schemes started by the colonial administration. In the 1990s, the provident funds were transformed into defined benefit PAYGO social insurance scheme known as Nigeria Social Insurance Trust Fund (NSITF) thereby creating two parallel public schemes based on defined benefit—one contributory and the other non-contributory. Participants in the former were mostly private sector workers. Prior to the recent reforms, the Nigerian pension system was bedeviled by several challenges including institutional fragmentation, political interference, and abuse of social security funds (Koripamo-Agary 2009).

For instance, although the defined benefit PAYGO scheme in the public sector was already unsustainable, its problems were exacerbated by politically motivated increases in salaries and pension entitlements (The National Pension Commission 2006, p. 2). Social security reform in Nigeria therefore became necessary because governments could "no longer adequately meet its pension obligations. Between 1998 and 2000, for instance, pension entitlements increased by about 750%" (Assets & Resources Management Company LTD 2004, P. 2). By the end of 2003, the outstanding public pension liabilities was "more than 50 per cent of the total budgets of

the federal government for 1999, 2000 and 2001 put together and far more than each of the budgets” (Uche and Uche 2002, p. 236). Consequently, workers in Nigeria dreaded retirement, because it had come to mean absolute stoppage of income and a step into old age poverty (Uche and Uche 2002). The Nigerian pension system crisis was one of both mismanagement and weak institutional design. For instance, public sector pensions were mostly paid out of general revenues. The competing demands on the country’s consolidated fund meant retirement benefits payments were sacrificed for other things. Thus, it was “common spectacle to see pensioners forming unending queues at designated centers, in a bid to collect pension payments, with occasional reports of deaths on such queues on account of exhaustion and related causes”(Orifowomo 2006, p. 165).

Policy makers in Nigeria began contemplating social security privatization in the 1996, two years after they adopted PAYGO social insurance program. As far as global norms were concerned, privatization had by the mid 1990s attained the status of the appropriate policy response to various policy challenges ranging from public service delivery to social security reforms. For instance, by the end of this period, several countries in Latin America, and Central and Eastern Europe had successfully incorporated private schemes into their overall social security plans (Brooks 2007; Muller 2002; Orenstein 2005, 2008). In the Nigerian case, the use of privatization as policy instrument began in the 1980s. But it was not until the mid 1990s that policy makers included social security privatization in their overall development agenda. In doing so, Nigerian policy-makers argued that social security privatization had become a means to successful economic and capital market development across the world (Pensions Subcommittee 1997). In the country’s Vision 2020 development agenda, policy makers cited Chile as a successful case to frame, and to support their claim. Nigerian policy makers argued that in the 1980s, Chile’s economic circumstances were similar to that of their country, however, the former had become the magnet of foreign direct investment in Latin America because social security privatization boosted its capital market development by making it a safe haven for investor funds (Pensions Subcommittee 1997). Specifically, they argued that:

Chile’s economic circumstances in the 1980’s were almost similar to Nigeria’s today: low GDP per capita, low savings, high unemployment, high inflation, etc. Nigeria desires a quantum leap in her economic output just as Chile in the early 1980s. If the reformed pension system facilitated Chile’s economic renaissance, adapting Nigeria’s system to some of the good attributes is only natural and sensible (Pensions Subcommittee 1997, 48).

In addition to making direct references to developments in social security systems in Latin America, the pension subcommittee provided a detailed analysis of transformations that were occurring in parts of Europe and United States in the country’s Vision 2020 development agenda to support and to justify social security privatization in Nigeria (Casey and Dostal 2008). The core of their argument was that countries that privatize or incorporate private elements into their social security schemes have experienced positive and rapid economic growth “mostly financed by long-term savings primarily from pension funds; channeled to the real sector through the capital market” (Pensions Subcommittee 1997, p. 47). Policy makers in Nigeria argued further that the primary objective for including individual retirement accounts in their 1996 national development agenda was to ensure that “by the year 2010 most Nigerians shall have access to some form of social protection offered by the formal Social Security Program” (Pensions Subcommittee 1997, p. 45). Although the country’s Vision 2020 report that contained recommendations for social security privatization was published in 1997, its implementation was delayed due to political instability (Casey and Dostal 2008). After the 1999 elections, however, the civilian government led by Olusegun Obasanjo designed a new development policy document known as the National Economic Empowerment and Development Strategy (NEEDS). This program was largely inspired by the ideas in the Vision 2020.

Like the Vision 2020, NEEDS also emphasized privatization as the route to economic growth while prioritizing poverty reduction as an overall development goal. In 2003, social security privatization which was transposed from the Vision 2020 into NEEDS regained a priority status on the domestic policy agenda due to the quest for domestic capital market development (Government of Nigeria 2004). Policy makers in Nigeria made the decision to privatize social security in response to both domestic concerns over economic development, and in reaction to what was happening elsewhere in the world but without any direct support from the World Bank led coalition of transnational policy actors (Casey and Dostal 2008).

In terms of the actual domestic policy process, even though the Nigerian government has inserted private pensions into the NEEDS document, when pension reforms officially arrived on the domestic policy agenda, the government established various committees to examine the pension systems challenges, and existing proposals, and make recommendations for reform. The committee came to a unanimous conclusion that the best strategy for ensuring sustainable pensions for Nigerian workers was to replace the PAYGO scheme with defined contributions schemes (The National Pension Commission 2006). The committees which were tasked with advising the

government on how to proceed with pension reforms, “considered not so much the basic principles, but rather the details associated with establishing” (Casey and Dostal 2008, p. 246) individual accounts, and drew up a fitting legislation for it (Makinde and Fasinro 2005). As a result, although the unions especially the Nigeria Labour Congress (NLC) agreed that funded pension scheme was the appropriate solution to the country’s pension crisis, they also criticized the committees for adopting a non-participatory and non-inclusive approach to the reforms (Aborisade 2008; Nigeria Labour Congress 2004). During the legislative stage, various committees in the Nigerian Federal legislature granted interest groups the opportunity to shape the final bill by holding series of hearing on the reforms (The National Pension Commission 2006). The unions however argued that their concerns on issues relating to representation of stakeholders and pension fund governance were ignored during these hearings, and the bill was passed into law. The unions and other social partners used the post legislation stages when the bill was being prepared for implementation to ensure they were effectively represented on the major institutions entrusted with governance of pension funds in the country (Casey and Dostal 2008; The National Pension Commission 2006). Even though the reform took place under a democratically elected government, the reform processes suffered from the legacies of authoritarian rule as they were mostly driven by the government, its agencies, committees and commissions (Aborisade 2008; Makinde and Fasinro 2005).

Observing the Nigerian reforms from a distance, the World Bank which in the 1980s and 1990s incorporated social security privatization in its overall financial market development strategy in Sub-Saharan Africa, and argued later that its original approach to old age income security reform applies equally to countries in that region (Holzmann 2003), advised Nigerian policy makers in the 2000s against social security privatization on accounts of underdeveloped capital market (Andrews 2006). But as far as the “Nigerian government was concerned, taking steps to reform pensions was seen as a way of improving the country’s credibility” (Casey and Dostal 2008, p. 243). The Nigerian reforms also show that policy makers in that country had enormous latitude in terms of timing and in the decision making process. Nigeria’s choice of a single pillar old age income security plan based on defined contributions is the most radical in the 21st century. It is different from the initial three-pillar scheme recommended by the World Bank in its *Averting the Old age Crisis* publication, and was based on a common understanding among the major actors in Nigeria that because governments have not been able to honour pension promise to retirees for years, there was the need to try competitive market arrangements (The National Pension Commission 2006). The unions who under normal circumstances would be opposed to the replacement of the PAYGO scheme came on board for two reasons. First, they shared the notion that the PAYGO plan was unsustainable, and the Nigerian government cannot be trusted to deliver on pension promises considering the predicament of pensioners in their country. Second, the Nigerian reformers ensured unions have strong representations in the management of the new scheme. Specifically, the unions and other social partners threw their weight behind the private pension plans because the organization that managed the previous PAYGO scheme was transformed into a Pension Fund Administrator (PFA), and trusted with the responsibility of acting on behalf of employees in terms of monitoring and supervising the performance of their retirement accounts. Employees and employers also have strong representation on the Pension Commission—the body that regulates the operation of private pension funds in the country (Casey and Dostal 2008). These arrangements resonate with blame and protests avoidance logics which show that inclusion of the social partners in the overall governance of the pension funds helps to foster cooperation and a sense of ownership (Weaver 1986; Béland and Marier 2006). The defining feature of the new Nigeria pension scheme is that benefits are directly linked to contributions. This implies that upon retirement, contributors receive in lump sum their total contributions and any interest that accrue on them minus any administrative charges.

The Politics of Social Security Reform in Ghana

Like Nigeria, Ghana also had two public pension programs with similar pattern of development. In 1960s, policy makers in Ghana established defined contribution scheme provident funds for public and private sector workers that were excluded from the unfunded non-contributory program that was set up during the colonial era (Kpessa 2012). This program was layered on top of a program known as CAP 30 inherited from the colonial administration. The introduction of this plan effectively introduced two parallel public pension schemes. Later in the 1970s, the non-contributory feature in the CAP 30 program was changed to ensure civil servants covered by this plan also contribute a percentage of their income towards retirement. The program however remained unfunded and benefits were paid out of general revenues. Later in the 1990s, the provident funds were converted into a partially funded PAYGO social insurance program called Social Security and National Insurance Trust (SSNIT) to pay out monthly benefits. The transition was necessitated by inflation and currency devaluations associated with structural adjustment reforms. But what the transition meant was that Ghana continued to operate parallel public pension schemes both defined benefit, with the SSNIT scheme partially funded, and the CAP 30 unfunded. And while the CAP 30 generally had flexible eligibility requirements and generous levels of benefit, the

SSNIT scheme had stringent eligibility requirements and with comparatively lower levels of benefit (Government of Ghana 2006; Kumado and Gockel 2003).

Despite several problems, the SSNIT scheme had a well defined investment policy and the scheme was generally well managed. Funds from the scheme were invested in various areas including health, education infrastructure, residential and stock market in sectors of the domestic economy. Thus, it was able to generate interest to augment contributions received from participants of the plan. As a result, the SSNIT scheme was able to honour the promises made to pensioners despite delays relating to administrative challenges such as poor record keeping (SSNIT 2006). Because the CAP 30 plan was annually budgeted for, pensioners covered by this plan were able to receive their regular benefits, even though the scheme exerted enormous pressure on government budgets (Government of Ghana 2006). Overall and compared to the Nigerian pension system, the Ghanaian pension system was not only generating revenue; it was also well managed.

Although workers in Ghana had demanded a reform of the pension system to ensure fair treatment of all workers, successive governments could not muster the courage to alter the CAP 30 due to fear of resistance by civil servants. In Ghana, amidst campaigns for the 2004 presidential and parliamentary elections, workers covered by the SSNIT scheme led by the Ghana National Association of Teacher (GNAT) and the Trades Union Congress (TUC) used the impending general elections as a window of opportunity to embark on industrial action to press home demands for comprehensive social security reforms. Several of the demonstrators comprising workers and pensioners directed their frustration at the SSNIT scheme by displaying effigies and placards some of which read, "SSNIT pension is worse than HIV/AIDS", "SSNIT pension is suicidal." In general, the view among workers was that the SSNIT scheme was not only inferior to the CAP scheme, it also symbolized disrespect and insult to a segment of Ghanaian workers (The Chronicle 2004). In response to the protests, the government under the presidency of John Agyekum Kuffour established a commission to consult with workers and the Ghanaian public on ways to address the country's social security challenges (Government of Ghana 2006).

The reform process involved extensive public consultation and participation of civil society groups and individuals who made written and oral submissions on their understandings of the pension system challenges, and how they could be addressed. The members of the reform commission used radio, television and newspaper advertisements, publications, debates, discussions and expert analyses to directly engage the public in order to ascertain what people generally perceived to be the challenges undermining the country's social security system, and to gather ideas for reform (Government of Ghana 2006). The employers' association and the labour unions were particularly active in the process (Government of Ghana 2006). Contrary to Nigeria's reforms where policy makers decided on social security privatization before engaging the social partners, the dominant preference that emerged from the public consultation and participatory processes in Ghana was overwhelmingly against privatizing the existing PAYGO program (Presidential Pension Commission 2006). This position was however not shared by the Institute of Economic Affairs (IEA), a policy think tank that has long been canvassing for social security privatization (Osei 2003; IEA 2004). But the IEA's position was not considered a threat to the reforms because (a) it was not a veto player, and (b) the social partners who were perceived as the major stakeholders favored an arrangement that combines both defined contribution and defined benefit principles.

Unlike the Nigerian reforms, Ghanaian policy makers revised and maintain the PAYGO scheme managed by SSNIT and grafted two private pillars—one mandatory and the other voluntary—on top of it (Government of Ghana 2006). One of the fundamental reasons for this reform was to restructure the entire old age income security system to ensure fairness and equal retreat of all categories of workers. The goal was to solve the problem of institutional fragmentation and its associated challenges, provide opportunities for diversification of the sources of retirement income. As earlier indicated, prior to the recent reforms, the Ghanaian old age income security system consisted of two parallel public defined benefits schemes and series of private schemes that were not properly regulated. Thus rather than outright social security privatization or adoption of comprehensive defined benefit social insurance scheme, policy makers decided to navigate opposition from the various beneficiary constituencies associated with the various programs, by re-organizing the entire social security system into a three-tier plan around already existing institutions and ideas. Policy makers supported their option of three-tier by arguing that apart from reflecting ideas and institutions that Ghanaian workers are familiar with, the three-tier model also reflects trends across the globe, and enhances the country's investment climate (Personal interviews, March, 2008, Accra, Ghana).

Under the new social security scheme, the defined benefit scheme (CAP 30) inherited from the colonial systems, which provided coverage mainly for civil servants was collapsed into the PAYGO social insurance scheme under the management of SSNIT. Thus, the PAYGO scheme was kept under the new arrangement as first-tier. It is a scheme that is mandatory for all workers, and retains the principles of defined benefit and the employer-employee funding formula. The main objective of the first tier is to provide monthly benefits to pensioners (Government of Ghana 2006). It is based on risk pooling and solidarity. Employers contribute 12.5%

while employees contribute 5% on the basis of the latter's basic income. The second-tier is also mandatory for all workers. It was however designed as a privately-managed occupational scheme based on the principles of defined contribution to pay supplementary lump sum benefits, with options for the purchase of annuities in conformity with prevailing trends in the world (Personal interviews, March, 2008, Accra, Ghana). This layer is a private scheme, also financed through specified employer-employee contributions (Government of Ghana 2006). On top of these two mandatory schemes is another private layer embedded with attractive tax incentives to encourage voluntary retirement savings among all Ghanaians. The third tier conforms to, and operates in line with already existing legislations regarding long term savings (Government of Ghana 2006).

Beyond the unification of the public schemes, the addition of the two private layers was necessitated by concerns over investment potential of social security funds as well as what was seen as the need to diversify the sources of retirement income. Similarly, the unions also expressed the need to design the overall social security scheme in such a way that ensures some provision of lump-sum benefits consistent with early post-independent social security arrangements (Personal interviews, March, 2008, Accra, Ghana). In particular, those who favor income diversification argued that such a practice, especially where the market is allowed to manage portions of retirement income was not only a global trend in the world, but also a means to boost the country's drive for development by creating domestic pools of investment capital (Personal interviews, March, 2008, Accra, Ghana). Apart from making direct references to privatization as a prevailing global norm in social security, the pension reform commission undertook an extensive and comprehensive study of pension systems in Europe, Asia, Latin America and other African countries through study tours and the use of internet search engines (Government of Ghana 2006). These processes further exposed the pension reform commission to the global discourse in this policy. Thus, although the transnational actors were not directly involved in social reforms in Ghana, the pension reform commission was aware of the positions they support. In any case, the transnational actors have more or less inserted themselves in several domestic policy environments in many African countries since the 1980s (Olukoshi 2007). Nonetheless, the members of the pension reform commission and other social partners argued that Ghana's pension reform policy choices were not only made in the spirit of global competitiveness, but also designed in a way that addresses pension system crisis of the country without attention to the posturing of transnational actors (Personal interviews, March, 2008, Accra, Ghana).

Ghana and Nigeria in Comparative Perspective

In both Ghana and Nigeria, the idea of privatization as a policy instrument has always resided at the foreground and background of policy discourse. This idea was later re-enforced through a transnational process of interaction with policy makers in other countries, a study of reforms in other jurisdictions, and an exchange of ideas with transnational actors like the World Bank. Thus, although the World Bank in particular had relaxed its positions on pension privatization and moved on, because policy makers in Nigeria and Ghana were part of the broader discourse around privatization since the 1980s, it was easier for them to gravitate towards private sector solution, which in many ways had assumed the position of global norm. The point is that by the 1990s, privatization in these countries became a routine that arose naturally out of their own experience and interaction with policy makers in other countries and transnational actors. Policy makers in Ghana and Nigeria used this routine as a means to minimize their transaction cost, and to enhance their legitimacy and acceptability within the global community. While they pointed to the social security privatization across the globe to frame and justify their decisions to their domestic audience, they used the choice of privatized social security to signal to the rest of the world that their countries were acting in a manner that is consistent with what is considered an appropriate behaviour for attracting investment. Both Ghana and Nigeria opted for social security privatization against other alternatives because by the mid 1990s privatization derived a great deal of its structure of meaning, appeal, and its logic of appropriateness from a global discourse in which it was widely perceived as the right thing to do. Policy makers in both countries took steps to examine the pension policy environment in other countries to ensure their policies were consistent with the general pattern in other parts of the world.

The variations how private sector solution was designed in the pension reform processes in both countries were arguably driven by issues such as governance and political regimes. Political institutions differ, and they "have a great deal of influence in determining which policy actors are the most influential in a given policy area" (Orenstein 2000, p. 12). Political institutions generally shape and affect the opportunity structures of actors, and mediate their interactions and relations between and among them in different ways. Authoritarian regimes for instance, have greater leverage and are capable of undertaking radical reforms without recourse to interest groups and stakeholders, or concern over electoral implications of reforms. And because authoritarian regimes are usually not based on constitutional rule, the kind of veto (Tsebelis 1995) granted various actors in democratic systems of governance are typically non-existent. In contrast, democratic systems by their nature, do not only require transparency and some amount of participation in the policy process, they also distribute power among various

institutions in ways that make outright privatization of existing programs difficult. Consequently, policy makers are more likely to resort to building consensus among major actors around the creation of private programs on top of existing programs. For instance, open and democratic participation in the reform deliberation in Ghana led to non-replacement of the existing PAYGO scheme. This is because the major stakeholders mostly drove the process at every stage. On the other hand, Nigeria replaced the existing PAYGO largely because the decision to privatize was taken during the authoritarian era, and the process, which occurred in a democratic regime, was given by government committees, agencies and a parliament dominated by the ruling party.

Furthermore, perceptions especially problem definition of how existing PAYGO plans were governed plays a major role in the decision to either replace or add private pillars to an existing PAYGO scheme. In Nigeria, the existing PAYGO pension programs were generally perceived as corrupt, inefficient and incapable of honouring their promise, hence, it was relatively easier for policy makers to generate a consensus around replacement or outright privatization of the existing scheme. In Ghana however, in spite of some challenges, the PAYGO pension program was generally considered as capable of delivering on its promises hence the reform focused on adding two more private pension pillars to diversify retirement income sources, and use retirement savings as mechanism for domestic capital market development. In the latter case, because privatization of the existing PAYGO plans could potentially change benefit arrangement of present and future beneficiaries in uncertain ways, policy makers could face resistance and opposition if they attempt to replace the existing scheme with the kind of individual accounts adopted in Nigeria. In this case therefore, Ghanaian reformers focused on creating additional layers based on the principles of defined contribution on top of the existing arrangement.

In a nutshell, although the World Bank was not directly involved in pension reforms in Ghana and Nigeria as was the case in Latin America and Central and Eastern Europe (Muller 2002, 2003) policy makers in both countries were part of the broader discourse around privatization as a policy instrument in an interactive process that included transnational actors like the World Bank and several other actors. The two countries differ in the final institutional arrangement of how private sector solution was applied to their pension system based on the amount of space domestic politics could allow. Nigeria completely replaced its PAYGO scheme with individual accounts because (a) although the reform occurred under a democratic government, the choice of private pension plan had its roots in the authoritarian regime, (b) the PAYGO scheme was generally perceived as poorly managed and bankrupt making it easier to generate a consensus on replacement. On the other hand, because the Ghanaian pension PAYGO scheme was relatively well managed, and the process of reform involved extensive and open public deliberations, the reform was directed not at a replacement but on additional new private layers to the existing PAYGO scheme in a way that addresses the problems of inequity and uncoordinated institutional fragmentation.

Conclusion

This paper analyzes the decisions and circumstances under which Ghana and Nigeria opted for social security privatization although such a policy does not have enough goodness of fit with the socio-economic and administrative environment of both countries. It shows that in both countries, social security privatization was made in response to a dominant global policy frame, the adoption of which was assumed to enhance a country's investment climate and global image. Policy makers in the developing world are often torn between making policies that directly address the socio-economic and political challenges of their domestic constituencies or simply conforming to prevailing global norms even if the adoption of those norms do not directly address domestic policy challenges. The article illustrates this tension. In Nigeria, because policy makers were fixated on social security privatization, they failed to accommodate the fact that similar policies existed in their country between the 1960s and 1994, and were abandoned for PAYGO social insurance schemes due to a lack of capital market to hold retirement contributions. Ghanaian policy makers on the other hand were a bit more cautious in the sense that they did not only maintain the PAYGO social insurance scheme, they also added two private supplementary pillars as a means for diversifying old age income security. Nonetheless, in both cases, policy makers enjoyed significant autonomy in making the decision to privatize social security in terms of timing and institutional arrangement of the schemes. In addition, policy makers in the two countries were successful in navigating potential interest groups' resistance by making sure the social partners and major stakeholders have strong voice in either the process or the regulatory agencies of the new arrangements.

At the ideational and ideological levels, the paper shows that although the transnational actors especially the World Bank were major players in the reconstruction of privatization since the 1980s, the use of private sector solution does not necessarily always emanate from a direct involvement of such actors. In other words, the World Bank is not a monolithic entity and does not have monopoly over privatization. Therefore, while the World Bank helped pushed pension privatization to the policy agenda in several countries in the world, it does not always follow that the adoption of private sector solution in this policy area in all countries is directly shaped by the Bank.

As Conteh and Ohemeng (2009) noted, although transnational actors exerted influence on some African countries in the area of privatization, in other countries including Botswana, privatization of public services was purely a domestic matter. The rush to establish a direct causal link between public policy choices made in the developing nations and the transnational actors that promote similar ideas, has only served to marginalize alternative explanations and distort our understanding of politics, policy processes and transnational activism. Thus, rather than assuming that domestic actors are always at the receiving end, it is imperative to conceptualize all these actors—domestic and transnational—within the broader framework of interactive social learning. In other words, both the domestic and the transnational policy actors are part of a community of policy actors that interact or exchange ideas in various ways on policy issues. They operate in a collective relationship that fosters exchange of ideas and learning at both ends, and both are consciously and unconsciously open to updating their causal beliefs as and when necessary or when such beliefs are challenged by empirical reality. By conceptualizing the interactions and relationships between transnational and domestic actors this way, we are better able to explain why domestic policy makers voluntarily carry out reforms often perceived as actions of transnational actors, as well as, explain why transnational actors like the World Bank have often revise their positions on specific policy issues like social security over time. =

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