32nd WEDC International Conference, Colombo, Sri Lanka, 2006

SUSTAINABLE DEVELOPMENT OF WATER RESOURCES, WATER SUPPLY AND
ENVIRONMENTAL SANITATION

Sanitation policy: how intentions & interpretation affect policy implementation

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National sanitation policy plays a role in increasing sanitation coverage and improving sanitation service provision. Who develops policy and how they develop it, influences the degree to which that policy is subsequently implemented and the impact it achieves. Based on the assessment of sanitation policy content and processes in a range of countries, the paper analyses the various factors that influence the implementation of policy and its impact upon services to the poor. It raises questions about how to take account of these factors in the course of efforts to improve sanition policy.

Introduction

Despite the best efforts of governments, international agencies, NGOs and individuals, progress towards improving sanitation coverage in an effort to achieve the MDG sanitation target remains disappointing. While successful local initiatives exist, few have led to national programmes and initiatives with the potential to bring about significant differences in sanitation conditions (Tayler and Scott 2005). Sanitation provision continues to lag behind that of other services and most governments invest far less in sanitation provision than they do in water services. It is becoming increasingly clear that the MDG sanitation target is likely to be missed by a wide margin. (Fisher et al 2006).

It is reasonable to assume that this situation has arisen, at least in part, because of the lack of effective national sanitation policies. Elledge et al (2002) argue that policy provides the framework within which those who are seeking to improve sanitation can operate. Good policy can help to establish an environment in which sanitation can be addressed on a scale that can significantly contribute to improved national health, well-being and economic development opportunities.

Fieldwork in Nepal and Ghana (WEDC 2005a and 2005b) revealed that, while this might be true in theory, the reality was that policy was often less influential than might have been hoped. It was clear that it was not enough to develop a sound policy, based on realistic assessment of existing trends and future possibilities. Other factors had to be taken into account, not least the processes through which policy is developed and the influence of these processes on its subsequent implementation. In essence, the research reached the not altogether unsurprising conclusion that involving key stakeholders in the policy development process is likely to be a necessary condition for policy implementation.

The present paper re-examines the conclusions of the previous work in the light of more sceptical views on the role of policy. It asks whether policy is implementable and, if so, what are the forces that are likely to influence the form in which it is implemented. In particular, how might the reactions of key stakeholders to the content of policy and their capacity to undertaken the tasks assigned to them by the policy influence the implementation of that policy?

The paper does not claim to present definitive answers to the questions that it raises. Rather, it is intended to identify issues that might usefully be the subject of further research.

Who makes policy?

Both the previous fieldwork and this paper take an instrumental view of policy, where the objective is to facilitate change, leading to improved sanitation conditions with a particular emphasis on the needs of poor people. Mosse (2004) points out that there is another dominant view that sees policy as 'a rationalising discourse, concealing the hidden purposes of bureaucratic power or dominance'. For proponents of this view, rational planning provides a cloak that hides the true political intentions of those who develop and promote policies, (see for instance Ferguson 1990). This view takes it as self-evident that development interventions will fail. Mosse notes that some, at least, of its proponents (for instance Cook and Kothari 2001) have argued that the true intentions of even supposedly participatory and 'bottom-up' policies may be different from their stated pro-poor objectives. If these commentators are right, policy may not have the beneficial outcomes assumed by Elledge and his co-authors.

Assessment of the Nepal and Ghana policies and the processes followed to produce them suggests that policy rarely operates either as a pure instrument or as a rationalizing discourse. Institutions undoubtedly seek to mould policies to increase their own power and influence. In both countries, the national ministry with official responsibility for sanitation took the lead in developing the policy. The key player in Nepal is a specific department, the Department for Water

Supply and Sewerage (DWSS), within the lead ministry, the Ministry of Physical Planning and Works (MPPW). Not surprisingly, these institutions assigned themselves central roles in the implementation of policy. However, the main weakness of policy lay in the inability of these lead institutions to ensure that other organizations, particularly high level organizations, would play the roles assigned to them by the policy. The Nepal policy, for instance, assigned key roles to two influential government departments, the Ministry of Finance and the Planning and Development Department. There appeared to be little evidence that they played the role assigned to them. Without their close involvement, policy implementation would always be problematic.

Regardless of this, there was no evidence of politicians and bureaucrats trying to influence sanitation policy for their own ends. This is perhaps unsurprising. Sanitation policy, unlike that on say tax and land, is unlikely to bring significant financial benefits to the elite groups in society. With little incentive for those in power to mould it to their own ends, the danger is rather that sanitation will be ignored. Where responsibilities for service provision are decentralized, sanitation provision can easily become marginalized as local decision-makers focus on public investment and ignore services such as sanitation, that are primarily a private household responsibility. In the case of sanitation, at least, policy was very far from the central organizing principle, shaping the way in which people live, act and think, suggested by Shore and Wright (1997).

NGOs with knowledge of sanitation provision in poor communities can have an impact upon policy. For instance, Pakistan's recent Draft National Sanitation Policy contains several key ideas that are clearly drawn from the thinking of the influential Orangi Pilot Project (OPP). These include the 'component sharing' model (householders take full responsibility for local sanitation facilities while government provides trunk sewers and treatment), training 'community technicians' in surveying, mapping, estimating and construction supervision, plus the conversion of existing stormwater drains into 'box' sewers. This provides further reason to believe that policy formation is not necessarily dominated by elite power brokers. Another interesting aspect of the Pakistan situation is the way in which the ideas of the OPP were initially taken up by international agencies and 'champions' within government rather than government officials working at the local level.

This brings us to another key point. In both Nepal and Ghana, international agencies played a key role in policy development, both funding policy development processes and contributing significantly to the intellectual framework within which policies were developed. UNICEF supported the development of Nepal's 1994 National Sanitation Policy while the 2004 Rural Water Supply and Sanitation Policy, which to a large extent replaced it, was funded by the Asian Development Bank (ADB). The international influence appeared most obvious in those aspects of sanitation policy that reflected wider policy directions, including the emphasis on decentralization, the need for a demand-responsive approach, community participation and gender. It would be naïve to say that the activities of international agencies are completely unaffected by political pressures and influences. However, this is a long way from making the blanket assertion that international agencies are primarily concerned with ensuring their own power and dominance.

Taken together, these findings suggest that while individual stakeholders may seek to secure their own positions, their concerns may be compatible with a genuine desire to achieve policy objectives. This, in turn, suggests that a simplistic view that policy cannot be implemented because it always reflects the vested interests of dominant groups, is untenable. The more interesting question, with which the remainder of this paper is concerned is how the interests, concerns and capacities of different stakeholders, whether involved in the policy development process or not, might influence the implementation of policy.

Factors influencing policy implementation

In order for a policy to be effective, the various stakeholders must:
- recognise it;
- have the powers and resources required to implement it; and
- be prepared to implement it.

Recognition

In both Nepal and Ghana, those aspects of sanitation policy that reflected wider government and/or international agency priorities, in particular the emphasis on demand, community participation and decentralization, enjoyed wide recognition and agreement (at least in theory) among those who were aware of the policy. This is not surprising, as one would expect sector-specific policies to be compatible with general government priorities and approaches.

It is arguable that higher level bodies in Nepal did not fully recognize and engage with the roles set out for them in the policy. This perhaps reflects a wider principle that policies must have high level support if they are to be implemented. Based on research conducted on behalf of WSP in Zambia, Malawi and Zambia, ODI (2004) note that water supply and particularly sanitation are often poorly represented in Poverty Reduction Strategy Papers (PRSPs). This suggests a need to place greater emphasis on convincing key decision-makers of the importance of sanitation. ODI also observes that PRSPs refer to sanitation as a cross-cutting issue, which concerns many institutions across several sectors but is not a main priority for any of them. Experience in Nepal and Ghana confirms that, given sanitation's relative invisibility, policies are only likely to be recognized and respected if they have wide support at the highest level, for instance the national finance ministry and the national planning and development department.

Box 1: Limited policy recognition in Nepal

Most NGO representatives attending a workshop to assess Nepal's sanitation policy held in Pokhara, a regional town, said that they were unaware of sector specific aspects of policy. Clearly, people can only recognize and implement a policy if they are aware of it. The Pokhara experience suggests a need to pay greater attention to the ways in which policies are developed and disseminated.

Powers and resources

As already indicated, the Nepal and Ghana policies reflected wider government policies on decentralization, participation and the need to take a demand-based approach. In both countries, it was assumed that central departments would move from being service providers to enabling others to provide services. It seems that adequate powers were generally devolved to allow local stakeholders to carry out the duties assigned to them by policy. However, there were clearly problems in both countries because local stakeholders had limited resources to fulfil their responsibilities under the policy.

Nepal's 1994 National Sanitation Policy and Guidelines recognised the need for additional people at the local level and proposed additional posts to fulfil this need. These included a woman sanitation supervisor in every district, overseers, technicians and female sanitation workers, four per district. In fact, the women's posts were never created. While the reasons for this are not clear, one possible reason is that the funds required to create the posts were not made available. If true, this reinforces the earlier point that policies need to be widely recognized and supported by high-level government ministries and departments if they are to have any chance of success.

In Ghana, the problem of limited capacity at the local level was overcome, at least in the short term by creating District Water and Sanitation Teams (DWSTs). These were temporary project-level entities, created by the Community Water Supply and Sanitation Agency (CWSA, part of the Ministry of Housing and Works (MHW), the lead ministry for water supply) as a stop-gap measure to fill the gap left by the lack of technical capacity in local government organisations.

Willingness to implement

What are the differences between policy as conceived and policy as implemented? While the case studies provided no definite answers to this question, they did provide some indications that changes do occur. The DWSTs in Ghana are an example of changes made in the field in the light of real or perceived problems with the written policy. A similar situation has arisen in Pakistan, where a decision in 2001 to devolve all responsibilities for sewerage and drainage implementation to lower levels of government has been partly overturned in recent years. Many local government engineers have returned to the Public Health Engineering Department (PHED), their parent department, which has re-established a major role in the design and implementation of water supply, sewerage and drainage projects. This may be a pragmatic response to deficiencies in policy but it indicates the PHED's unwillingness to accept the greatly reduced role assigned to it by the decentralization policy.

Lessons in policy implementation
Implementation is not a linear process

The examples given in the last paragraph point towards a key conclusion, that policy formulation and implementation is an interactive process. Policy proposals tend to attract either support or opposition from the groups affected by them. It may take some time for the likely impacts of policy to become clear. Once they do, those groups who feel that they are going to be adversely affected may lobby policy makers and/or resist the implementation of policy, in the process altering the way in which policy works out in practice (Grindle and Thomas 1991).

Grindle and Thomas note that reaction to policy may arise among the general public and/or in the bureaucracy. Who reacts and when will depend on who is affected by policy and when they realize that they are likely to be affected. The public might react to the removal of subsidies on toilet construction, although the extent of such reaction is likely to be limited as subsidized construction is rarely widespread. Bureaucratic reaction to changes in sanitation policy that affect roles, responsibilities and potential rewards will probably be more significant.

Interpretation affects policy outcomes

Mosse (2004) notes that bureaucracies often exercise less control over events themselves than they do over the interpretation of events. If a stakeholder group can interpret a policy as supporting its own objectives and values, it will continue to support that policy. So, in order to continue to recruit support, policies must impose growing coherence on those who argue about them or oppose them. Based on analysis of a DFID-funded rural development project in India, Mosse concluded that various stakeholders tend to focus on the aspects of policy that are in accordance with their perceptions and concerns and interpret the policy implementation process to suit their viewpoint.

The research in Nepal and Ghana did not consider this possibility explicitly. However, there were indeed some indications that stakeholders do interpret policies in ways that suit their positions and viewpoints. In Nepal, for instance, government officials quoted figures that gave the maximum rate of growth when estimating the change in sanitation coverage, in order to show that the policy's ambitious coverage targets were achievable. In Ghana, several workshop participants said that the lack of reference to the CWSA in the Environmental Sanitation Policy (ESP) was not important because CWSA was not in fact involved in sanitation provision.

The real issue here seems to be the extent to which the interpretation of policy either strengthens or undermines

the intended policy outcomes. Interpretation is undoubtedly necessary and policy should certainly be reviewed in the light of experience, but interpretations that ignore or explain away inconvenient facts are unlikely to lead to lasting change and development.

Policy change takes time

Such development is likely to be a long-term process, as the history of sanitation development in 19th century Britain shows. Urban population growth rates in English and Welsh cities were comparable with those experienced in many developing countries at present (Fisher et al, 2006). Much of the housing built to accommodate the increasing urban population was inadequate, with poor water supply and sanitation causing serious concerns about public health. Legislation to improve sanitary conditions was introduced relatively early, with the 1848 Public Health Act establishing a Central Board of Health with powers to supervise street cleaning, refuge collection and sewage disposal. Despite this, improvements came slowly and significant improvements in sanitary conditions and public health were only achieved towards the end of the century.

This has significance for policy and the way in which stakeholders interpret that policy. If policies are unrealistic about the time frame required to bring about improved sanitation conditions, the probability is that there will be a wide gap between objective reality and stakeholder interpretations of events, which will be influenced by an understandable desire to show that policy is working.

Conclusion

Policy is important and may indeed be a necessary condition for country-wide improvements in sanitation. However, there is a need for increased emphasis on the ways in which policies are implemented and the processes that can be put into place to ensure that lessons learnt in the course of policy implementation are acted upon. Pushing for rapid change without taking account of current realities should be avoided.

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