Sanitation Policy

Why it is important and how to make it work

Summary

This note is concerned with sanitation policy, what it is, why it is important and what can be done to ensure that it is relevant and can be effectively implemented. It draws directly on research work carried out in Nepal and Ghana and indirectly on experience from several other countries.

Improved sanitation can contribute both directly and indirectly to the Millennium Development Goals, but this contribution is unlikely to be achieved in the absence of appropriate sanitation policies – which help to provide the overall framework within which change and improvement can take place.

Sanitation policy is more likely to have an impact if it stands alone rather than forming part of a combined water and sanitation policy. However, policy can only make a difference if governments want it and are prepared to implement it.

With this in mind, this note provides guidance on generating support for policy improvements and ensuring that policy leads to action.

Headline findings

- Policy is important. It provides the framework within which improved sanitation services can move from isolated projects to national programmes. It is an important tool for the achievement of the MDG sanitation target[1].
- Policy documents should be concerned with overall objectives, the principles to follow and institutional roles and responsibilities to achieve those objectives. A strategy/action plan, plus guidance materials, can support a short policy document.
- Policy recommendations must not be implemented unless they are realistic, based on a sound assessment of existing conditions, problems and opportunities and accounting for the resources needed and available.
  - Policy targets for sanitation coverage in Nepal and Ghana are unrealistic, given the insufficient resources allocated to achieve these targets. Policy makers do not always account for what is already happening in the field.
- The policy development process can be used to generate interest and support in sanitation and improved sanitation policy.
- To be effective, policies must be widely owned. Those leading the policy development process must be able to engage with a wide range of stakeholders, to convince them of the value of policy.
  - Policies are often formulated at departmental level, with limited follow-up to ensure that senior decision-makers in affected ministries and organizations are committed to their implementation.
- Policy must link to PRSPs[2] and other national drivers of change.
- There is a need for greater focus on implementing policy and learning from experience.
  - NGOs that are active in the sanitation sector, such as Nepal Water for Health (NEWAH) in Nepal and WaterAid in Ghana, should be fully engaged in the policy development process.

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Sanitation and the Millennium Development Goals

The international community is committed to achieving the Millennium Development Goals (MDGs) and their associated targets.

- Reductions in the worm infections and diarrhoea resulting from improved sanitation and hygiene will help to increase people's productivity and so contribute to Goal 1, 'Eradicate extreme poverty and hunger'.
- The convenience, security, health and education benefits resulting from improved sanitation are likely to accrue particularly for women and will thus contribute to Goal 3 'Promote gender equality and empower women'.
- Target 5, to 'reduce by two thirds, between 1990 and 2015, the under-five mortality rate', is dependent on action to provide hygienic sanitation facilities and deliver effective hygiene education.
- Target 10, to 'halve by 2015 the proportion of people without sustainable access to safe drinking water and basic sanitation', is explicitly concerned with sanitation. Improved sanitation will also contribute to the achievement of other goals.
- Target 11, to 'achieve a significant improvement in the lives of at least 100 million slum dwellers by 2020', requires action to provide improved sanitation in slums.

Halving the proportion of people without access to improved sanitation will not be easy. Sanitation provision has historically lagged behind that of other services and few governments invest as much in sanitation provision as they do in drinking water facilities. Examples opposite show that current rates of sanitation provision in Nepal and Ghana will have to be increased if the target is to be achieved. It will then be important to ensure that sanitation facilities are used. Good policy, grounded in existing realities and widely recognized and supported can contribute to the achievement of these objectives.

Policy – what it is and why it is important

Policy is *'the set of procedures, rules and allocation mechanisms that provide the basis for programmes and services'* (Elledge et al, 2002). It is normally set out in a written document and must be supported by suitable policy instruments. These include laws and regulations, economic incentives, such as subsidies and fines for unsafe waste disposal, and information and education programmes, designed to create demand for improved sanitation services.

Policy provides the framework within which those who are seeking to improve sanitation can operate. A bad policy may constrain efforts to introduce effective sanitation services. For instance, a policy that states that municipalities must provide piped sewerage may prevent the development of more appropriate forms of sanitation in low-income and low-density areas. Conversely, good policy can:

- provide a clear focus for action by setting clear objectives and targets;
- ensure that stakeholder organizations are clear about their roles and responsibilities and what they can expect from others[4]; and
- ensure that there is general agreement on the principles and practices to be followed, for instance in relation to subsidies.

Why sanitation and hygiene need their own policy

In many countries, sanitation is considered along with water supply in a national water and sanitation policy. In others, the policy covers solid waste disposal in addition to excreta disposal and drainage. A combined policy can take account of the strong links between water, sanitation and health. Unfortunately, the institutional requirements of water supply and sanitation may be very different, particularly where most sanitation facilities are 'on-plot'.

Most combined policies focus on water supply and deal with sanitation in a rather perfunctory way. For instance, Nepal's Rural Water Supply and Sanitation Policy focuses strongly on community management but has little to say about the role of individual households, which are likely to have a major role in sanitation provision and management. If sanitation is to be given due attention, it needs its own policy.

Guidelines for the assessment of national sanitation policy

There is a clear need for guidance on the development, assessment and improvement of sanitation policy. The 'Guidelines for the Assessment of National Sanitation Policies' (Elledge, et al, 2002), identify *a process* that starts with the collection of background information and moves on to more detailed consideration of 'key elements' required to ensure successful policy formulation and implementation.

The challenge – achieving increased coverage and use

In Nepal, WaterAid (2004) estimate that sanitation coverage rose from 18% in 1990 to 27% in 2000. Expansion of coverage will have to be significantly increased if there is to be any chance of halving the proportion of people with access to improved sanitation by 2015.

Approximate estimates suggest that the total sanitation investment required to meet the MDG goals in Ghana will be of the order of $1 billion, of which around 75% will be for urban facilities. At the current rate of investment, rural sanitation coverage may actually fall from a current figure of around 31% to about 24% in 2015[3].

Policy content

The Ghana policy and the various Nepal policies all contain an overall target for sanitation coverage. These targets are probably too ambitious. More detailed targets are normally best left to back-up documents, such as strategies and action plans.

Ghana's policy which sets out the problems and issues to be addressed, explains the role of sanitation in achieving wider development goals, identifies overall objectives, states principles and identifies, in broad terms, the roles and responsibilities of the various stakeholders.

This note provides additional information to help place the Guidelines within the wider policy development process. It is based on workshops and consultations with key stakeholders in Nepal and Ghana, held over a 12 month period of the research.

Presenting policy – lessons from Nepal and Ghana

Nepal has developed a conceptually attractive method of presenting policy. A short policy document is associated with one or more back-up documents that provide additional information to support the implementation of policy. The 1994 National Sanitation Policy is supported by Guidelines. A more recent combined rural water and sanitation policy (2004) is supported by Strategies and Sectoral Strategic Action Plan.

When following this approach, it is important to be clear about the purpose of the various documents. The role of the Policy itself should be to establish overall goals, specify broad roles and responsibilities and identify key principles.

The strategy should provide more information on the approach to achieving the overall goals, identifying intermediate objectives and specifying who will be responsible for achieving them. It might include information on action to be taken to develop support for policy, the role of government financed programmes in supporting policy and the use of pilot and demonstration projects as an aid to achieving policy, together with more detailed guidance on roles and responsibilities.

The role of Action Plans is to set out the short- to medium-term actions required to implement the strategy while that of Guidelines is to provide additional information on implementation. To be useful, documents have to be reasonably detailed. Nepal has recently developed national Guidelines for Sanitation and Hygiene Promotion, 2005 to support the 1994 National Sanitation Policy. It would perhaps be more appropriate to produce a number of guidelines on specific topics, rather than trying to produce one Guidelines document to cover every aspect of sanitation.

What are the conditions for policy to make a difference?

Both Ghana and Nepal have serviceable, if not perfect, sanitation policies. Yet, both countries are some way from achieving their overall policy goals. The research suggests that it is not sufficient to look only at policy. Rather, it is necessary to also consider the conditions that need to be in place for policy to make a difference. These conditions relate to:

- *The context*. Are key stakeholders committed to improving sanitation facilities and implementing policy? If not, it is unlikely that any policy, no matter how good, will be implemented.
- *The policy itself – is it clear and realistic*? An unclear policy can be interpreted in different ways or ignored. A policy that is not grounded in a realistic assessment of existing conditions, problems and possibilities will

Key policy principles

Key policy principles include:

- The approach to be taken in relation to demand, subsidies and cost recovery.
- The approach to incentives, in particular the way in which incentives to communities as a whole might be used to support efforts to achieve 100% coverage.
- The need to support initiatives to improve sanitation services, wherever they occur, rather than tightly prescribing who can and cannot take such initiatives.
- The need to take a wide view of sanitation, encompassing hygiene behaviour and links with other services.
- The need for plans and programmes to take account of gender, vulnerable groups and environmental concerns.

The process chart shown here was used to develop and guide the policy assessment *process* in Nepal and Ghana.

It provides a development of the current process diagram for policy assessment, as provided in the EHP Guidelines.

The process chart can be used to decide where you need to start and what you need to do to introduce/improve sanitation policy.

Whilst the chart shows *generating support* and *developing policy* as separate activities, it is possible that the process of developing policy can be used to generate support for that policy and its prescriptions.

appear irrelevant to field workers. In both cases, the result will be that the policy has little or no impact.

- *Stakeholder awareness of the policy and its implications*. If those who are required to implement policy do not know about it, they cannot implement it. This implies a need to pay attention to the ways in which information on the policy and its implications can be disseminated.
- *Stakeholder acceptance of the policy*. Policies are unlikely to be widely accepted unless they are both clear and relevant. However, clarity and relevance are not enough. Policies must also be broadly owned, in the sense that stakeholders feel that the policy responds to their concerns, priorities and needs. We will see shortly that breadth of ownership is directly related to the process through which the policy is developed.
- *The quality and relevance of policy support instruments*, including amendments in legislation and procedures, strategies, action plans and programmes.

The policy development process

The starting point for policy improvement will depend on the existing situation and in particular the extent to which there is political will to review and produce/revise policy.

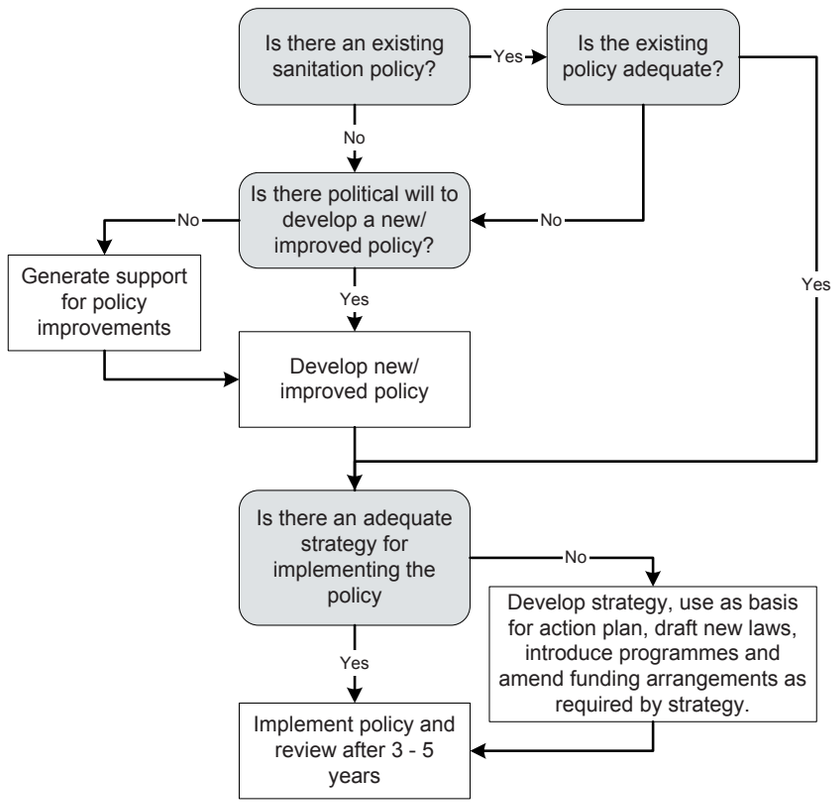

Figure 1. The policy development process

- In Ghana, most external funding is channelled through combined water and sanitation projects, which are implemented by the Community Water and Sanitation Agency (CWSA). CWSA is not even mentioned in Ghana's Environmental Sanitation Policy which appears to focus mainly on water supply.
- Nepal's Department of Water Supply and Sewerage does have a dedicated sanitation cell but this is small. Decentralization in Nepal has led to decisions on infrastructure priorities being made at the District level and below and institutions at these levels rarely prioritize sanitation. The 1994 sanitation policy in Nepal recognised the need to introduce sanitation-related expertise at these levels, but unfortunately its staffing recommendations were not implemented. A lack of specialist sanitation expertise at these levels of government means that the situation is unlikely to change.

Political will for policy improvement

In both Ghana and Nepal, the research suggested that sanitation currently has a low profile, as compared with water supply and other policy concerns. These findings point to the need to generate support for sanitation provision in general and for policy improvement and implementation in particular.

The policy assessment processes in the two case study countries suggest that a workshop can provide a good starting point for developing awareness of the need for change and that follow-up contacts and discussions, by either an individual consultant (Nepal) or a 'core' stakeholder group (Ghana), can further develop and spread awareness of the need for change. However, workshops are unlikely to attract the support of the high level politicians and officials, without which talk of policy improvement is unlikely to lead to action.

The process used to develop the Rural Water Supply and Sanitation Policy in Nepal (under the Asian Development Bank's PPTA[5], 2002/2003) was overtly participatory. A wide range of stakeholders was involved in a series of workshops at which issues were identified and discussed and elements of policy were agreed. The consultants who led the process identified the following limitations in the process.

- It is relatively expensive and is therefore unlikely to be undertaken without donor support.
- Workshops can identify the areas in which consensus exists, but do not provide a good forum for resolving contentious issues.

Developing new/improved policy

Where current policy is inadequate, assessment of policy should lead into the development of new improved policy. The research suggests that policy is normally formulated, and policy documents produced, by either a consultant or a team from the department that is leading the policy development process.

One key to the subsequent implementation of the policy is the extent to which those leading the policy development process are able to engage with a wide range of stakeholders and convince them of the value of the policy. Interviews with key stakeholders in the development of sanitation policy in Ghana and Nepal suggested that there was some such engagement in both countries but that this did not extend to all stakeholders and was insufficient to ensure that all aspects of policy were widely known and accepted.

A key point relating to both awareness-raising and policy formulation is the difficulty in ensuring that senior decision-makers from ministries and departments other than the lead ministry will attend workshops. This means that workshops cannot, in themselves, ensure that the policy is widely agreed and accepted **at the highest level**. This is particularly important where government systems are strongly hierarchical, so that most important decisions are made at the highest level.

The experience of Ghana and Nepal suggests that relatively small amounts of donor support can help to establish and sustain high-level coordination bodies. It will normally be particularly important to draw representatives of national planning bodies and the Ministry of Finance into deliberations on policy and its importance. Indeed, coordinating bodies are most likely to be effective if they enjoy support at the highest level, most importantly from the national Planning Ministry.

The role of high-level coordination bodies

One response to the need for better inter-ministry, inter-departmental and inter-agency coordination is to form permanent high level working groups, coordinating bodies and steering committees. In addition to facilitating coordination, such bodies can also make the case for sanitation and facilitate the dissemination and implementation of sanitation policy. To function effectively, these bodies will often need financing and some form of secretariat, to ensure that their recommendations are acted upon.

Implementation of policy is more likely if the policy is linked to key government documents such as a country's Poverty Reduction Strategy Paper (PRSP) or equivalent. If sanitation is a central element in the PRSP, ministries and departments, from the Ministry of Finance down, together with donors, will be committed to providing resources for sanitation improvement. They will therefore be more likely to view sanitation policy as important. Sanitation is referred to briefly in the Approach Paper for Nepal's 10th Five Year Plan, which doubles as its PRSP. It is also mentioned in the Ghana Poverty Reduction Strategy. Here the problem may be the failure of the current sanitation policy to define a role for CWSA and the consequent tendency for CWSA and its donors to work outside policy.

Adequate strategies for implementing the policy

The objective of a policy assessment and development process should never be solely to produce a policy. Rather, the aim should always be to ensure that the policy has a positive impact on national sanitation services. This requires systems and procedures to ensure that the policy is implemented. At the national level, this may require:

- enactment of new laws and sanctioning of new norms and procedures to support policy recommendations;
- an increase in the budget allocated to sanitation and hygiene promotion; and
- the implementation of plans and programmes to support the policy.

Local authorities can increase the budget that they allocate for sanitation in their areas but more general budget increases will require action by national government.

Overall, these findings suggest that policies must be realistic, must take account of all the stakeholders and be linked to PRSPs and other drivers of change. Remove any one of these conditions and policy is unlikely to be successful.

Key steps in assessing national sanitation policy

In summary, the key steps in assessing national sanitation policy, using the EHP Guidelines as a guide, are proposed as follows:

- Determine the best approach to carry out the assessment (refer to Section 1), ensuring that those leading the policy review process can influence subsequent implementation of that policy.
- Assess the current sanitation situation by obtaining realistic, relevant data (Section 2). Assess targets given in PRSPs, existing policy and other overarching documents to realistic targets, given the current situation and available/ required resources.
- In consultation with a broad group of stakeholders, determine the status regarding key elements of policy (Section 3).
- Analyse the findings and present these to the broad stakeholder group, providing opportunities for discussion, amendments, agreement and recommendations.
- Discuss and agree mechanisms for incorporating recommendations into policy review procedures.

The process chart in this note can be used to check the status regarding progress with amendments to policy, strategy and implementation procedures.

Linking the policy to drivers of change

The sanitation policy is more likely to be implemented if it is linked to the initiatives that are driving change in the country. In the first instance, it may be possible to link policy development to high-profile events. For instance, Nepal's Minister for Physical Planning and Works attended the South Asian Conference on Sanitation (SACoSan) in Dhaka in October 2003. However, it is not clear that this visit did lead to renewed efforts to implement or improve sanitation policy. This suggests that one-off events on their own are insufficient to bring lasting change.

Some key issues

Decentralization

Both Ghana and Nepal have gone through a process of decentralization and this is reflected in their sanitation policies. In both countries, the lead role in service provision is now assigned to local government entities, which fall under the local government ministry. In Ghana, the Ministry of Local Government and Rural Development (MLGRD) is also the ministry with responsibility for sanitation policy. However, even in Ghana, national and regional government entities are required to move from a providing to an enabling role. In practice, the capacity of local government in both countries is very limited and it appears that the specialist sanitation agencies continue to play a major role in service provision. So, there is a gap between what is prescribed by decentralization policy and what actually happens. Sanitation policy can respond to this situation by:

1. Explicitly considering the action to be taken to taken to create/strengthen local government sanitation-related capacity.
2. Clearly setting out the role to be played by specialist agencies, both in the short and the longer term. This role may at times involve rather more than facilitating the work of other organizations. When considering possible roles always follow the golden rule that 'policy prescriptions must be realistic'.

Capacity-building recommendations must clearly state whose capacity is to be built and for what purpose.

Subsidy

Sanitation policy must clearly state who should pay for sanitation services. Government should focus on promotion and higher order facilities, such as main sewers and treatment works, which protect the wider environment. Users should normally fund the construction of latrines and pay for their operation. Any subsidies for poor people should be clearly identified and explained. Even where significant subsidies on public facilities are allowed in the short term, the policy should say something about the desirability of reducing them over time.

Increasing the focus on sanitation

The research suggests that sanitation continues to be linked to water supply, often in the role of the 'junior partner'. In Nepal, a joint rural water supply and sanitation policy has recently been produced, despite the fact that there is already a sanitation policy. In Ghana, international agencies continue to channel funds through CWSA for joint water and sanitation programmes, which are heavily weighted towards water supply.

Evidence from other African countries, including Ethiopia and Tanzania, suggests that Ghana is not unique in this respect. There is a need for a much greater emphasis on sanitation in both policies and programmes. Given the very different institutional frameworks required for piped water supply and on-plot sanitation services, it will often be appropriate to develop specific sanitation programmes rather than seeing sanitation as an add-on to water supply.

Encouraging innovation

Policy should encourage innovative approaches to sanitation provision. Examples of such approaches from the case study countries include the introduction of school-led 'Total Sanitation' in Nepal and the involvement of small private sector artisans to support sanitation marketing and implementation in Ghana.

The aim should not be to specify how and where innovations should be attempted but rather to recognize their value and make provision for small amounts of funding where appropriate.

Footnotes

[1] The Millennium Development Goal (MDG) sanitation target is to halve the proportion of people without improved sanitation by 2015.

[2] Poverty Reduction Strategy Papers.

[3] Based on figures contained in report prepared by Lukman Y. Salifu as part of a joint WEDC/WaterAid investigation of sanitation policy in Ghana.

[4] Non-government organizations play an important role in sanitation provision and hygiene promotion in both Nepal and Ghana. Policy can facilitate the roles played by such organizations by recognizing their activities and clarifying their relationship to government systems.

[5] Project Preparation Technical Assistance.

This Briefing Note presents key aspects of sanitation policy; what it is, why it is important and what can be done to ensure that it is relevant and can be implemented effectively.

It is based on the findings of research undertaken in 2003-2005, as part of a DFID-funded research project *Application of tools to support national sanitation policies (R8163)*.

Other research outputs include:

- National sanitation policy in Ghana: a case for improved co-ordination? – a briefing note from Ghana.
- Implementing national sanitation policy in Nepal: challenges and opportunities – a briefing note from Nepal.
- Comparing National Sanitation Policy Content – a note summarising and comparing the content of sanitation policies from 9 countries.

Key references

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The Nepal Government's 10th Plan, which doubles as its PRSP is available at http://siteresources.worldbank.org/NEPALEXTN/Resources/Nepal_PRSP.pdf (accessed Sept 2005).

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