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MAXIMIZING THE BENEFITS FROM WATER AND ENVIRONMENTAL SANITATION

Sanitation policy in Ghana – Assessing key elements and policy measures

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This paper presents a summary of the process, findings and proposals of an assessment of Ghana's Environmental Sanitation Policy based on the application of EHP's Guidelines for the Assessment of National Sanitation Policies. The findings show that while all the key elements usually listed as ingredients of a good policy framework are present in the Environmental Sanitation Policy there has been slow implementation of its strategic objectives. An important outcome of the assessment is that proposals addressing gaps in the policy were made for further review and revision of the policy to provide working-level application of results of the assessment. An implication of the assessment concerns how work on existing guidelines on assessing sanitation policies can be taken forward. An important dimension is the need for strengthening initiatives for building capacity of staff of technical institutions responsible for developing and implementing policies.

Background

In 2002, the Environmental Health Project (EHP) of USAID produced Guidelines for the Assessment of National Sanitation Policies [1]. WEDC has subsequently led DFID-funded research in Ghana and Nepal to field-test the Guidelines. In Ghana, WEDC worked with WaterAid Ghana and the Ghanaian Ministry of Local Government and Rural Development to assess Ghana's Environmental Sanitation Policy (ESP) [2] based on EHP's Guidelines for the Assessment of National Sanitation Policies [1].

In addition to field-testing the EHP Guidelines in relation to sanitation policy in Ghana, the research aimed to contribute to policy dialogue, development and implementation processes in Ghana. The emphasis was on carrying out systematic analysis of all aspects of sanitation policy, using the policies in relation to key elements identified in the Guidelines. The research was concerned with the ability of policy to address the needs of all sectors of society. It aimed to answer a series of questions identified in the Guidelines on the basis of information gathered through collaboration among sector actors and identify mechanisms to ensure the availability of resources (institutions and finances) for effective implementation of policy recommendations.

Overview of Assessment Process

A summary of the process adopted for the applied-research is depicted by Figure 1 – a generic process flow diagram developed by WEDC. Key points regarding the process are described below

Preparation and first workshop

Information collection and rapid situation analysis was car-

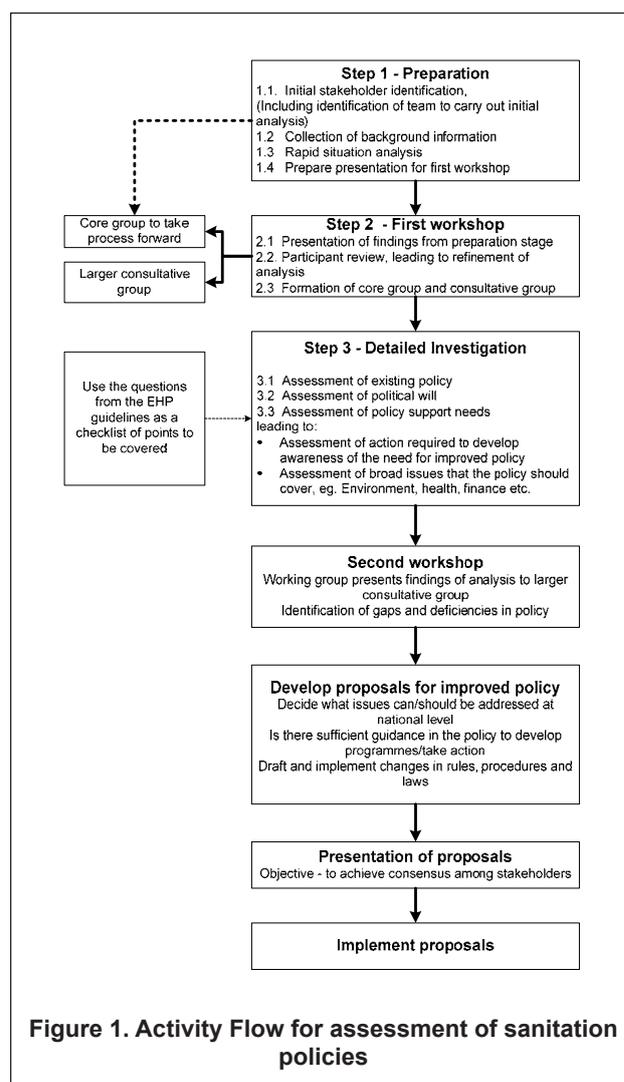


Figure 1. Activity Flow for assessment of sanitation policies

Box 1. Core group membership

Ministry of Local Government and Rural Development (Policy Division)
 Ministry of Works and Housing (Water Directorate)
 Community Water and Sanitation Agency(CWSA)
 Ghana Water Company Limited
 Tema Municipal Assembly (Waste Management Division)
 Regional Environmental Health Unit (Tamale)
 Afram Plains District Assembly
 Town and Country Planning Department
 School Hygiene Education Project, MoE/GES
 Ghana Health Services (Occupational Health Division)
 CIDA-District Capacity Building Project
 WaterAid Ghana
 TREND-Private Service Provider

ried out by the principle author, in his role as a consultant working closely with WaterAid.

This led into the first workshop, held in October 2004 and involving representatives of concerned government departments, NGOs and international agencies working in the sanitation sector. During the workshop, the findings of the rapid assessment were presented and the Core Group, with responsibility for taking the assessment process forward was formed.

The Core Group was restricted to a maximum of 14 members. Membership cut across key sector institutions and actors. As indicated in Box 1 above.

Preparation for Core Group meeting:**Documentation**

Prior to the first meeting, the Secretariat circulated the following document to all members:

- Report of the first workshop;
- EHP guidelines; and,
- The Environmental Sanitation Policy of Ghana.

Meeting Process

A summary of the findings of the preparatory stage was presented and discussed in detail. The facilitator presented a comprehensive policy appraisal matrix on the key areas and questions drawn from the EHP Guidelines. This was made up of 58 rows of key elements by 9 columns of policy themes, Gaps and Proposals created for detailed assessment of the National Environmental Policy.

All members received and validated the matrix. The matrix and key questions became the focus of discussion among the CG group members. Prior to the second CG meeting, the questions were applied to the appraisal matrix in order to set the scene for detailed assessment by CG members.

CG-members analysed the key issues in the ESP using Section 4 of the EHP Guidelines as well cross-cutting questions

and themes identified in the course of the first workshop. It was recognized that sanitation-related policies other than the ESP were in preparation. To facilitate their work the facilitator obtained these from the relevant institutions and circulated to the CG members.

Commitments and formation of sub-thematic Groups

At the end of discussion and simulation sessions, members subscribed to the key areas and questions for which they felt qualified to contribute to detailed assessment. It was recognized by all members that not all the questions raised in the EHP are applicable to the ESP and other sanitation related policies.

Follow-on Steps

CG members received the policy appraisal matrix to guide detail investigation. The matrix contained all the key questions under each component. CG members were to provide feedback on their investigation to be collated by the WaterAid/facilitator/consultant. Other sub-sector documents currently being collated by the Water Directorate of the Ministry of Works and Housing in preparation of a consolidated National Water Policy (NWP) were circulated among the CG before the second meeting.

CG Meeting No. 2 (and Workshop No.2) -The second CG meeting discussed the findings of individual CG members and those collated by the facilitator. These were presented and discussed in detail. The second workshop was scheduled to take place immediately prior to the second workshop but eventually was timed to coincide with the workshop. Prior to the workshop, the facilitator/consultant worked with a select team drawn from the CG to write out the findings into a report as outlined in the EHP guidelines.

A policy assessment matrix (Note 1), was used to link the key elements of the EHP Guidelines to common themes of the policy.

Main Outputs

The reports produced from the assessment include the following;

- Situational assessment report, covering sector institutions, existing policies and regulations as well as coverage data for water and sanitation;
- The main assessment report [3]. This identified positive aspects of existing and planned sanitation policies and regulations, highlighted aspects of these that were inadequate and made suggestions for improving the Environmental Sanitation Policy and ‘policy environment’;
- Workshop Reports of (i) the launching of the applied-research work and, (ii) the presentation of the findings;
- Process Report(s) explaining how Core Groups were created and the flow of Core Group discussions and conclusions thereon;
- A report on proposals for implementing findings [4] syn-

thesizing the key challenges and gaps in respect of each key element (focus area), related recommendations and proposals as well as an action plan. This was prepared and presented to the Ministry of Local Government and Rural Development. The intention is that this will serve as a working document to guide the way forward to refine the policy and, where necessary, take appropriate remedial actions.

Main Findings of the Assessment

The key findings emerging from consultations during the assessment using the same broad structure as that used to set out the key elements in the EHP Guidelines:

National and International Development Agenda: The policy needs to be responsive to the Ghana Poverty Reduction Strategy (GPRS), the current development framework of Ghana, as well as the Millennium Development Goals (MDGs).

Political Will: while there is evidence of political will to promulgate policy, there appears to be a lack of political will to support implementation. The failure to implement policy is also partly due to lack of capacity at District Assembly (local government) level but can also be attributed to weakness at the center. Indeed sanitation improvement strategies have tended to be operationalized only through projects (on an ad-hoc basis). Where strategic proposals have not been implemented, these same proposals have sometimes been given different names and presented as part of new policies of related sectors. For example, the District Environmental Sanitation Fund proposed in the ESP has metamorphosed into a District Water and Sanitation Fund proposed by CWSA.

Acceptance of Policies: at present, there is limited awareness of the environmental sanitation policy and its provisions. Without awareness there can be no acceptance. This is contributing to overlapping of activities between sector institutions and, at times, conflicting proposals on sanitation guidelines.

Legal Framework: legal provisions regarding the roles of central agencies and District Assemblies (local governments) are clear. However, there are challenges in implementation.

Implementation of Ghana's decentralization programme has stalled, leading to uncertainty about roles and some duplication. For example, there is need for coordination between the provisions of the ESP which requires the development of Strategic Environmental Sanitation Plans and the current practice of developing District Water and Sanitation Plans employed by water sector agencies and supported by the new National Water Policy.

Population Targeting: the policies are implicitly pro-poor but there is need for future policies to provide more specific attention to meeting the sanitation needs of the poor especially urban-poor.

Levels of Service: in the Ghana context, there is need to provide additional guidelines on appropriate options and

“best practices” to sanitation provision, especially for small towns. There is also a need to support policy with “appropriate” instruments. Appropriate legislative instruments can harmonise the specifications and types of facilities promoted by various projects.

Health considerations: there is a need for greater emphasis on health aspects of delivery of environmental sanitation services. There is scope for improved collaboration between the Ministry of Health/Ghana Health Service (GHS) and the Ministry of Local Government (MLGRD). For instance, GHS's “roll back malaria” intervention covers education on proper sanitary conditions in communities but, to date, the MLGRD has had a very limited role in this intervention.

Environmental considerations: the ESP recognises the role of EPA but only in relation to monitoring of those MMDA projects that have significant adverse environmental impacts. There is need to develop ways of addressing impacts and outcomes at the policy and strategic levels and to consider how these might be incorporated into GPRS processes.

Financial considerations: the CWSA SIP for 2005 – 2015 estimates the investment levels required to meet GPRS and MDG targets. The SIP could be seen as the strategy to achieve policy objectives for small towns and rural communities with populations below 50,000. The NESP does not provide for a consolidated estimate of required investments. There is need to resolve the conflicting proposals to set up a District Water and Sanitation Fund (National Water Policy) and a District Environmental Sanitation fund (NESP).

Institutional roles and responsibilities: while there are clear roles and mandates for sector institutions there is a lack of coherent programming for the environmental sanitation sub-sector. The policy's lack of recognition of key sector agencies such as the Community Water and Sanitation Agency (CWSA), the lead agency responsible for managing the national community water and sanitation programme and its regional teams, is a serious lapse. CWSA plays an important role in facilitating the provision of water and sanitation facilities as well as hygiene education to rural communities and small towns – this is an important aspect of meeting GPRS and MDG targets. The fact that CWSA is within a ministry other than the MLGRD, which developed the policy, is one reason given for this lapse, pointing to a lack of effective collaboration.

There is potential conflict between the roles of legal entities of local governments such as District Works Departments (DWDs), which are yet to be established (or slowly coming into being) in many District Assemblies (local government) and Project-Management-Unit types of entities, such as District Water and Sanitation Teams (DWSTs), created by CWSA to carry out project implementation. This has also contributed to misunderstanding in roles and ownership of DWSTs by District Assemblies.

The issue of institutional arrangements, in the authors' opinion, is a fundamental one that requires urgent attention and resolution as it is at the heart of the prevailing ineffective coordination and collaboration. The paradox is that “Water

sector institutions do not recognize the ESP which in turn does not recognize the role of those institutions. Those institutions are required to implement projects through District Assemblies (local governments) whose oversight-ministry is the Ministry of Local Government and Rural Development which developed the National Environmental Sanitation Policy to streamline environmental sanitation (including provision of water) in District Assemblies”.

Conclusions

On the Assessment Process

Assessment procedures were constrained by the following factors:

- Because of time constraints and logistics, it was not possible to consult a significant number of District Assemblies.
- Regional level assessments were also limited, as they depended on Core Group members from regional-level institutions.

These constraints meant that the assessment process did not throw sufficient light on the extent to which a number of policy strategies have been implemented at the Regional and District levels.

On the EHP Guidelines

The EHP Guidelines for the Assessment of National Sanitation Policies are a very useful tool for assessing sanitation policies. Possible limitations and/or opportunities for supporting the Guidelines are listed and briefly discussed below.

- Besides the key elements of the EHP guidelines (Table 1) it would be useful to provide a means for easier assessment of which policy measures or actions have been accomplished, how they have been accomplished and why they are important.
- The guidelines could usefully be supplemented by a document containing examples of how proposed policy measures (or actions) are written and how related action-plans might be developed.

On Capacity Building

The assessment brought to the fore the need to for capacity building for the staff of the technical institutions, in developing countries like Ghana, that are responsible for developing and implementing sanitation policies. There is need to build capacity for in-house policy analysis and monitoring in order to facilitate efforts to modify and improve policy in the light of field experience.

On Review of the Environmental Sanitation Policy

The research identified gaps in Ghana’s current Environmental Sanitation Policy and produced proposals [4] for addressing those gaps. These included suggestions as to the way in which policy actions are described in the Policy so that they are clearer and include expected outcomes that can be more easily evaluated.

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Table 1. Key Elements of Responsive Policies

<ul style="list-style-type: none"> • Political will • Policy acceptance • Legal framework • Target population • Service levels 	<ul style="list-style-type: none"> • Health considerations • Environmental considerations • Financial considerations • Institutional roles and responsibilities
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