



## Making Policies Work: Understanding Policy Evaluation through Swachhta Survekshan



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Mahila housing SEWA trust (MHT) is an autonomous organization, promoted by SEWA in 1994, with the overall objective of improving habitat conditions of poor women in the informal sector.

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## Abstract

Between its conception and its implementation, policies often travel a long and arduous journey. This research paper aims to analyse policy implementation in practice to understand the on-ground work involved in this exercise and analyse the intended and unintended consequences that are created in this process. Using sanitation as a domain to critically reflect on this theme, the paper begins with looking at the current challenges in India's urban areas with respect to sanitation and public health and provides a snapshot of the shifts in sanitation policy over the past few decades. The study centrally focuses on the ongoing Swachh Bharat Mission (SBM) and its evaluation mechanism Swachhta Survekshan to shed light on the how policies are made to work as well as the disjunctures between national visions and local realities in order to explore the potential of making policy impacts contextual and sustainable.

Keywords: Policy implementation, Cities, Governance, Sanitation, Urban Local Bodies

# Current sanitation situation and challenges for public health in India

Even as global hierarchies are being restructured and developing world economies upstage existing status quo, a country's state can often be gauged from its most basic, foundational indicators-how do we fare on our most basic provisions to ensure a dignified and productive life for our citizens, especially the poor? The question is brazen but fundamental. Despite having one of the fastest developing economies, India continues to struggle in its performance on human development indicators. Among these, sanitation provisions remain a key concern. Sanitation and public health are not merely a matter of meeting civic demand for vital needs but have a cascading effect on the larger socio-economic structure and processes.

**"One in every ten deaths in India is linked to poor sanitation. And nearly 44 million children under five remain stunted, robbed of the chance to achieve their full potential. All told, the country loses the equivalent of 6 percent of GDP due to inadequate sanitation."**

*World Bank Report 2016*

What does the current scenario on sanitation look like for the most populous democracy in the world? What are the opportunity costs we stand to tackle and how do we wish to deal with the sanitation challenge in the coming decades? Statistics from World Bank databases indicate that currently more than half the population in India is still unable to use basic sanitation services.<sup>2</sup> While the scenario looks despondent, alone it belies the story of growth and focus on sanitation programmes that have been initiated in India over the last decade. According to data collated by World Bank, the percentage of population using basic sanitation provisions has doubled over the last 15 years (growing from 21% in 2000 to 44 % in 2015).<sup>3</sup> Again these facts point towards use, not merely access- which would also present a different story of momentum of late.<sup>4</sup>

Yet sanitation and interrelated domains of public health remain an ongoing challenge for India. Sanitation expert Kavita Wankhade notes that "as of 2015 nearly 60 million people in urban areas lack access to improved sanitation arrangements and more than two thirds of wastewater

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<sup>1</sup> <http://www.worldbank.org/en/news/feature/2015/12/15/ending-open-defecation-achieving-clean-and-healthy-rural-india>. Accessed on 20th December 2018.

<sup>2</sup> <https://data.worldbank.org/indicator/SH.STA.BASS.ZS?end=2010&locations=IN&start=2010&view=map&year=2015>. Accessed on 20th December 2018.

<sup>3</sup> Ibid.

<sup>4</sup> Use of and access to a service provision are different aspects to gauge service level benchmarks. Provision of a service might allow access to a facility like a toilet complex but whether its operational and can be used by citizens depends on factors of its functionality.

is let out untreated into the environment, polluting land and water bodies.”<sup>5</sup> Wankhade’s observations don’t merely highlight service deficits but stress upon the fact that the challenge of sanitation provision is both massive and multi-dimensional, given that we perform poorly across multiple stages of the process such as enabling access to safe sanitary practices, incentivising their use and finding sustainable solutions for disposal of faecal sludge and wastewater.



Image. Despite the acute shortages, a vast majority of existing infrastructure built for sanitation provisions has been completely defunct. Lack of access to safe sanitation practices not only indicates an unavailability of civic provisions but also of the disarray of downstream factors across the waste management cycle. With this cycle of waste management facing challenges at multiple levels from waste generation, treatment to disposal, the current conditions become a health hazard for dense settlements and its residents.

Source- Mahila Housing Trust

With the majority of the global population projected to be living in urban regions by 2030- many with acute shelter insecurity- sanitation and public health have become a crucial agenda for creating liveable urban environments.<sup>6</sup> The question of who bears the greatest risk because of these inadequacies further illuminates the depth of the issue. Studies suggest that the lack of adequate sanitation and its associated risks are disproportionately borne by low income households in city slums. In a 2010 report, Water and Sanitation Programme (WSP) highlighted that “urban households in the poorest quintile bear the highest per capita economic impacts of inadequate sanitation.”<sup>7</sup> Until recently, however, sanitation has remained secondary to water supply provision in the Indian policy domain, despite (the recognition of) its monumental impact on human life, especially for the urbanpoor.<sup>8</sup> In addition, state intervention towards sanitation provisions in urban areas remained

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<sup>5</sup> Wankhede, Kavita. 2015. ‘Urban Sanitation in India: Key Shifts in the National Policy Frame.’ *Environment & Urbanization* 27(2): 555–572.

<sup>6</sup> The challenge becomes more perceptible when we see that unlike an exponential percentage increase in the population using basic sanitation services for the total population, urban populations using basic sanitation services account for a slower pace of change, rising to 65.4% from a 50% over the last decade. This pace of growth will not be able to keep pace with the demographic pressures given the rapid urbanization. See, <https://data.worldbank.org/indicator/SH.STA.BASS.UR.ZS?end=2010&locations=IN&start=2010&view=map&year=2011>. Accessed on 21st December 2018.

<sup>7</sup> WSP (Water and Sanitation Program). 2010. *The Economic Impacts of Inadequate Sanitation in India*. New Delhi: WSP



largely programmatic and piecemeal with no clear or comprehensive policy until just two decades ago. When and how did this shift happen? A deeper look at the shifts in policy sheds light on the recent developments that inform the current sanitation situation in India.

## Exploring policy landscape for sanitation in urban India

Critical reflection on the policy landscape in India reveals a definite lack in planned state investment towards building sanitation facilities in urban areas. While water supply provisioning is a crucial component of the larger sanitation value chain itself, post-independence the investments needed to address this chain came to be largely driven by programme specificities and not guided by coherent policies. What happened as a result was the prioritising of water supply projects in research allocation and policy outlook, while building sanitation infrastructure was put on a backburner. Further, the state interventions primarily centred around rural regions with urban regions remaining under acknowledged.<sup>9</sup>

For urban areas, there were merely ad-hoc interventions through technical solutions or subsidies aimed at the provision of sanitary toilets to disadvantaged communities, such as the Integrated Low-Cost Sanitation Scheme (ILCS).<sup>10</sup> According to Wankhede, it was over the last decade that a slew of state initiatives slowly began moving towards building a planned intervention for urban sanitation challenges through three kinds of efforts- via policies and advisories, programmes and investments, and data/information initiatives.<sup>11</sup> What these interrelated efforts have catalysed is a larger policy climate where sanitation and public health has been brought back into focus for urban India. The momentum for this shift gathered around the early 2000s.

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<sup>8</sup> MHT (Mahila Housing Trust). 2018. *A Framework for Improving Sanitation in Urban Poor Communities*. New Delhi: MHT.

<sup>9</sup> Within this lag, informal settlements within the city peripheries were purposely overlooked. Even as we invest in sanitation infrastructure through planned development, 'pre-planned' sewerage networks neither entirely cover planned settlements in the city nor attempt to address its slums- this dissonance denies the complex urbanism(s) that are a reality for cities in the global south where planned interventions do not necessarily precede inhabitation and lived realities.

<sup>10</sup> MHT (Mahila Housing Trust). 2018. *A Framework for Improving Sanitation in Urban Poor Communities*. New Delhi: MHT.

<sup>11</sup> Wankhede, Kavita. 2015. 'Urban Sanitation in India: Key Shifts in the National Policy Frame.' *Environment & Urbanization* 27(2): 555–572.

<p><b>2005-2014</b> <b>Jawahar Lal Nehru National Urban Renewal Mission (JNNURM)</b></p> <ul style="list-style-type: none"> <li>-Launched in 2005 based on findings from the 2001 Census.</li> <li>-Government of India needed a national-level program to catalyse the necessary investments for ULBs.</li> <li>-Covered 63 cities chosen for their size or political or historical significance.</li> <li>-Sub-Mission for Urban Infrastructure and Governance, overseen by the MoUD, covered infrastructure projects relating to water, sanitation, sewerage, solid waste management, road networks, urban transport, and the redevelopment of old city areas.</li> <li>-Sub-Mission for Basic Services to the Urban Poor (BSUP) covered the integrated development of slums through projects of providing shelter and other basic services.</li> </ul>	<p><b>2009</b> <b>National Rating and Award System Scheme for Sanitation in Indian Cities:</b></p> <ul style="list-style-type: none"> <li>-First large-scale sanitation survey; rated participating cities and categorized them as red, black, blue, or green depending on their marks.</li> <li>-Measured the following indicators: <ul style="list-style-type: none"> <li>-Output based indicators: different aspects of sanitation including behavioural aspects, treatment, disposal (50/100 points)</li> <li>-Process based indicators: systems and procedures (30/100 points)</li> </ul> </li> <li>-Outcome based indicators: quality of water, extent of reduction in sanitation-related and water-borne diseases (20/100 points)</li> <li>-Most cities didn't have this data available at the time, but the survey set the foundation for cities to begin collecting and measuring this data.</li> </ul>	<p><b>2016</b> <b>Atal Mission for Rejuvenation and Urban Transformation (AMRUT):</b></p> <ul style="list-style-type: none"> <li>-Purpose: infrastructure creation linked to provision of better services for citizens.</li> <li>-Goals: <ul style="list-style-type: none"> <li>(i) ensure that every household has access to a tap with assured supply of water and a sewerage connection</li> <li>(ii) increase the amenity value of cities by developing greenery and well maintained open spaces e.g. parks</li> <li>(iii) reduce pollution by switching to public transport or constructing facilities for non-motorized transport</li> </ul> </li> </ul> <p><b>Swachh Survekshan 2016</b></p> <ul style="list-style-type: none"> <li>-Inaugural Survekshan; purpose was to measure progress and promote a competitive spirit among cities</li> <li>-Surveyed 73 cities</li> <li>-Ranked cities based on strategy; IEC; solid waste collection, processing, and disposal; and toilet provision</li> </ul> <p><b>Cleanest city:</b> Mysore, Karnataka</p>	<p><b>2018</b> <b>Swachh Survekshan 2018</b></p> <ul style="list-style-type: none"> <li>-Most recently completed Survekshan</li> <li>-Surveyed all 4203 ULBs</li> <li>-Increased focus on solid waste processing and disposal, innovation, and behaviour change</li> </ul> <p><b>Cleanest city:</b> Indore, Madhya Pradesh</p>	<p><b>2014-2019</b> <b>Swachh Bharat Mission</b></p> <ul style="list-style-type: none"> <li>-Launched by PM Modi in 2014, using the rhetoric of Gandhian philosophy of cleanliness, promising Swachh Bharat Mission as a national tribute to Gandhi on his 150th anniversary in 2019.</li> <li>-Two sub-missions, Urban (led by Ministry of Urban Development) and Rural (led by Ministry of Drinking Water and Sanitation)</li> <li>-Main objectives include elimination of open defecation, eradication of manual scavenging, solid waste management, public awareness and behaviour change</li> <li>-Promotes participation by private sector and citizens to lead a dedicated policy to promote public health by making necessary sanitation provisions.</li> </ul> <p><b>Swachh Survekshan 2017</b></p> <ul style="list-style-type: none"> <li>-Surveyed 434 cities</li> <li>-Increased weight to citizen feedback</li> </ul> <p><b>Cleanest city:</b> Indore, Madhya Pradesh</p>	<p><b>2019</b> <b>Swachh Survekshan 2019</b></p> <ul style="list-style-type: none"> <li>-Set to begin in January 2019</li> <li>-Will again survey all 4203 ULBs</li> <li>-New focus on Sustainable Sanitation</li> <li>-New categories for ODF status: ODF, ODF+, and ODF++</li> <li>-New star rating system for Garbage Free Cities</li> </ul>
		<p><b>2017</b> <b>Smart Cities Mission</b></p> <ul style="list-style-type: none"> <li>-Urban renewal program with the mission to develop and make 100 selected cities sustainable</li> <li>-Competition-Based: Cities present proposals and compete for funding</li> <li>-Area Development models include retrofit, redevelopment, and greenfield development</li> <li>-Cities to create Special Purpose Vehicles with full-time CEOs to implement the Mission and execute Public-Private Partnerships, joint venture contracts, etc.</li> </ul>			

Image. A timeline of major shifts in the sanitation policy in India from early 2000s

A key shift in this policy climate was the 2005 Jawaharlal Nehru National Urban Renewal Mission (JNNURM) by the Central government. The umbrella initiative was intended to improve key infrastructure (water supply, sanitation, solid waste management, transport) and catalyse the necessary investments for urban local bodies. While Ministry of Urban Development was given the responsibility for infrastructure projects relating to water, sanitation, sewerage, solid waste management, road networks, urban transport, and the redevelopment of old city areas, a separate Sub-Mission for Basic Services to the Urban Poor (BSUP) was demarcated to cover the mandate of integrating slums to city networks through projects of providing shelter and other basic services.<sup>12</sup> Despite providing a financial boost, JNNURM's funding policy—due to its dependence on bringing reforms to improve governance in local administrations—was both slow and ineffectual in reaching beneficiaries.<sup>13</sup> It was through the National Urban Sanitation Policy (NUSP) in 2008 that sanitation was brought back into the urban policy space in a significant way.

Conceived by the Ministry of Urban Development to transform cities into “totally sanitised, healthy and liveable” areas, the policy looked to “ensure and sustain good public health and environmental outcomes for all citizens, with special focus on hygiene and affordable sanitation facilities for urban poor and women.”<sup>14</sup> By designating sanitation and hygiene as state subjects and yielding the 74th Constitutional Amendment to decentralise powers and responsibilities to the Urban Local Bodies (ULBs), the NUSP 2008 established the concept of ‘Open Defecation Free’ cities and emphasized awareness and behaviour change components for the first time. It undertook a cross-cutting, city-wide approach to sanitation that would link infrastructure to human resources.<sup>15</sup> The first initiative towards a largescale sanitation survey was made in 2009 through the National Rating and Award System Scheme for Sanitation in Indian Cities, where participating cities were ranked across output based, process based and outcome based indicators. While the survey faced the issue of unavailability of data on multiple accounts, the 2009 survey set the foundation for cities to begin collecting and measuring data of this nature.

Five years on, Swachh Bharat Mission (henceforth SBM), also called Clean India Mission, was launched by Prime Minister Narendra Modi in October 2014. As an umbrella mission that took all previous governmental schemes in its fold, SBM attuned itself to the rhetoric of Gandhian philosophy of cleanliness and personal hygiene as godliness, promising achievement of SBM goals as a national tribute to Gandhi on his 150th anniversary in 2019. Structured via two sub-missions, Urban (under Ministry of Urban Development) and Rural (led by Ministry of Drinking Water and Sanitation), SBM aimed at accelerating the country's efforts to achieve universal sanitation coverage and improved hygiene standards.<sup>16</sup> Steadfastly focused on

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<sup>12</sup> This emphasis on enhancing the provision of services and social amenities to the urban poor was later replaced by a dedicated programme for prevention of further slums' formation and the improvement of living conditions in existing informal settlements through the Rajiv Awas Yojana (RAY).

<sup>13</sup> MHT (Mahila Housing Trust). 2018. A Framework for Improving Sanitation in Urban Poor Communities. New Delhi: MHT.

<sup>14</sup> MoUD (Ministry of Urban Development). 2008. National Urban Sanitation Policy. New Delhi: MoUD

<sup>15</sup> Ibid.

eliminating open defecation, eradicating manual scavenging, solid waste management, enabling public awareness and behaviour change, SBM aimed to work through infrastructural development to improve access; IEC and awareness activities to incentivise use; and building capacity to administer the entire process and ensure accountability. Urban Local Bodies (ULBs) played a key role in this implementation process- from service provision, financial contribution to monitoring and evaluation.<sup>17</sup> Shouldering the responsibility of assessing need, disbursing funds to beneficiaries, ensuring development of adequate infrastructure, partnering with civil society organisations for IEC activities, generating revenue, participating in the nationwide evaluation strategy to assess ground conditions- ULBs were made responsible for handling all domains of action. Hence SBM was inherently designed as a simultaneous process of building capacity at the ULB level.

Launching Atal Mission for Rejuvenation and Urban Transformation (AMRUT) in 2012 and Smart Cities Mission in 2016 further catalysed an environment of urban renewal on the policy front. The emphasis on infrastructural development and service provision within AMRUT and Smart Cities Mission was pivoted on cities making themselves investment friendly and competitive in order to accrue capital gains. This strain of becoming investment friendly fed off a larger neoliberal developmental trajectory of making cities 'sticky'<sup>18</sup> in a world of fast moving capital. The intent of structuring policy and practice across cities through privately drawn finance, is becoming increasingly common and Swachh Bharat Mission was no exception.

While the momentum for tackling urban sanitation challenges was brewing from the early 2000s, post SBM the government has become insistent on working towards an overhaul of India's sanitation situation. It is unquestionable that warming up of the policy climate to the urgent needs of sanitation and public health have provided tangible targets to national visions and a launchpad for long standing objectives. Yet ensuring the effective implementation of policies cannot be done without a stringent monitoring and evaluation mechanism. Evaluation mechanisms appraise structural processes that are put in play in order to bring policies to fruition as well as gauge how national visions manifest in localised sites, providing opportunities to learn about the intended and unintended effects of policy implementation from real time practice. For SBM, this was done through a creation of Swachhta Survekshan Evaluation (henceforth SSE or Survekshan)<sup>19</sup>. A critical reflection on the internal structure and operations of Swachhta Survekshan illustrates how policies work on ground and the effects and challenges that they create in their functioning.

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<sup>16</sup> MoHUA (Ministry of Housing and Urban Affairs). 2017. Guidelines for Swachh Bharat Mission - Urban. New Delhi: MoHUA.

<sup>17</sup> Ibid.

<sup>18</sup> Baviskar, Amita. 2014. 'Dreaming Big: Spectacular Events and the 'World-Class' City: The Commonwealth Games in Delhi.' In *Leveraging Legacies from Sports Mega-Events: Concepts and Cases*, edited by Jonathan Grix, 130-141, New York: Palgrave Macmillan.

<sup>19</sup> For the purposes of this study, SBM and SSE is largely being examined through urban component i.e. Swachh Bharat Mission-Urban and Swachhta Survekshan Urban respectively.

## Understanding SBM implementation through the lens of Swachhta Survekshan

While Swachh Bharat Mission has been widely discussed in popular discourse from media to policy circles knowledge about its evaluation mechanism, the national sanitation survey in the form of Swachhta Survekshan Evaluation has remained relatively limited. The Survekshan (Urban) was designed as a national evaluation framework that involved a varied constellation of actors- ranging from national and state governments, city officials, urban local bodies, civil society, private organisations, citizenry - as it attempted to evaluate service level progress in cities, inspect their ground reality and capture citizen feedback on the ongoing processes.

Developed through guidelines set by the Central government, Swachh Survekshan Evaluation (SSE) system is touted to be “largest cleanliness survey.”<sup>20</sup> First launched in 2016 in the form of an annual examination of the progress made in relation to SBM, SSE assessed and ranked ULB’s in India on the basis of predetermined output, process and outcome indicators across parameters of service level progress, direct observation and citizen feedback.<sup>21</sup> These internal parameters have been refined each year from 2016 to the 2019 Survekshan in terms of indicators through which these parameters are gauged as well as tweaking of the relative component weightages.<sup>22</sup>

From covering 73 towns and cities in 2016, 2018 saw a survey of 4203 cities and the goal for the 2019 Survekshan was to cover all cities in India. Conducted through a detailed inspection by an independent organisation, the collected information, collated city profiles and rankings so awarded are visualized on online dashboards to enable comparisons and calibrations. Using multiple methods for its assessment, SSE currently gauges city performance through- service level progress reported by ULB authorities, direct observation through extensive field visits by independent assessors and citizen feedback through phone calls or dedicated interfaces like the mobile based Swachhta app. Based on a tender system in terms of appointing the third party investigator, the SSE was conducted by Quality Council of India (QCI) in 2016 and 2017; and handled by Karvy Data Management Services Limited (Karvy) for 2018 as well as the 2019 version.

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<sup>20</sup> MoHUA (Ministry of Housing and Urban Affairs). 2019. Swachh Survekshan 2019: Survey Toolkit. New Delhi: MoHUA.

<sup>21</sup> The process of Survekshan evaluation is annual but recertification to ascertain ODF status in cities is a bi-annual process.

<sup>22</sup> For a detailed description of all the changes in SSE assessment parameters and protocols for the Survekshan in January 2019, see <http://pib.nic.in/newsite/PrintRelease.aspx?relid=181857>. Accessed on 1st November 2018.

# Swachh Survekshan Evaluation

India's largest  
ever cleanliness survey



## Objectives

- TO encourage large scale citizen participation
- TO foster a spirit of healthy competition among towns and cities
- TO create awareness amongst all sections of society towards making towns and cities a better place
- TO study the progress of SBM(urban) and rank Urban Local Bodies in India on the basis of cleanliness and sanitation



## Actors Involved



National Government



Urban Local Bodies



Independent Assessors



Local Communities



## Process

### Service Level Ranking



Verify ULB Information  
Independent Assessor Evaluation

### Certification



Star Ratings, Awards, Titles

### Direct Observation



Physical Observation, Surveys, Pictures of public spaces

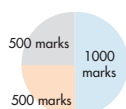
### Citizen Feedback



Collected Face to Face, through calls, and Portal

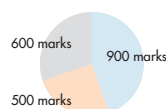
2016

73 cities



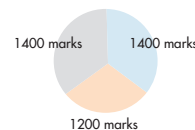
2017

434 cities



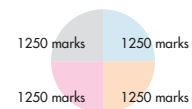
2018

4203 cities



2019

All Cities



Cities Covered



Survey Methodology

Service Level Status (50%)  
Independent Observation (25%)  
Citizen Feedback (25%)

Service Level Progress (45%)  
Direct Observation (25%)  
Citizen Feedback (30%)

Service Level Progress (35%)  
Direct Observation (30%)  
Citizen Feedback (35%)

Service Level Progress (25%)  
Direct Observation (25%)  
Citizen Feedback (25%)  
Certification (25%)

Image. A breakup of the SSE schema and internal constituents



This year's survey was digitally driven through MIS systems and also included a certification category pushing the total marking from last years' 4000 to 5000 in 2019 version. While the Survekshan assesses cities across a range of infrastructural and service provisions for sanitation and public health, what it does through its ranking systems is to create a competitive standard where cities compare themselves, both to their own performance in every subsequent year as well as to other cities and their performance.

Cities with population of one lakh or above and capital cities are ranked on a National scale and cities with population under one lakh are ranked on the Zonal Level – North, south, East, West and North East. Apart from the national and zonal rankings, cities having the best performance in urban areas are given awards and incentives to ensure SBM policy provisions are implemented effectively and SSE parameters are heeded.

While high rankings on the cleanest city metric and Open Defecation Free (ODF) status is the primary label which every city strives for, every added award or rating<sup>23</sup> not only accrues social capital for cities but also becomes a fertile terrain for attracting government praise or financial reward, simultaneously building city pride and incentivising investment. What this propels is a spirit of competitiveness amongst cities and their respective ULBs towards achieving progress not merely through service provision but in shifting practices and attitudes of resident citizens. Additionally, the inclusion of citizen feedback as a significant survey component puts the yardstick of measuring policy implementation in the hands of the citizens- a move that has seldom been incorporated in government schemas before in an effective manner.

The 2019 Survekshan assessment parameters have been restructured to include four equally weighed components- Direct Observation (25%), Citizen Feedback (25%), Service level progress (25%) and newly introduced Certification category (25%). This Certification category includes Open Defecation Free Protocols (ODF/ODF+/ ODF++) and Star Rating of Garbage Free Cities in order to further the agenda of sustainability in sanitation provisions.<sup>24</sup>

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<sup>23</sup> For instance, acquiring star rating or labels like fastest mover amongst ranks, regional frontrunners.

<sup>24</sup> PIB (Press Information Bureau). 2019. *Swachh Survekshan 2019 to focus on sustainability and public participation*. New Delhi: PIB.

"According to the 2019 Survekshan guidelines, the Star Rating protocol for Garbage free cities is "based on 12 parameters and follows a SMART framework – Single metric, Measurable, Achievable, Rigorous verification mechanism and Targeted towards outcomes – and has been devised in a holistic manner including components such as cleanliness of drains & water bodies, plastic waste management, managing construction & demolition waste, etc. which are critical drivers for achieving garbage free cities. In order to give added impetus to cities to accelerate their journey towards a garbage-free status, the Swachh Survekshan 2019 has allocated 20% weightage of marks to the star rating certifications."

See, <http://pib.nic.in/newsite/PrintRelease.aspx?relid=181857> Accessed on 5th January 2019.

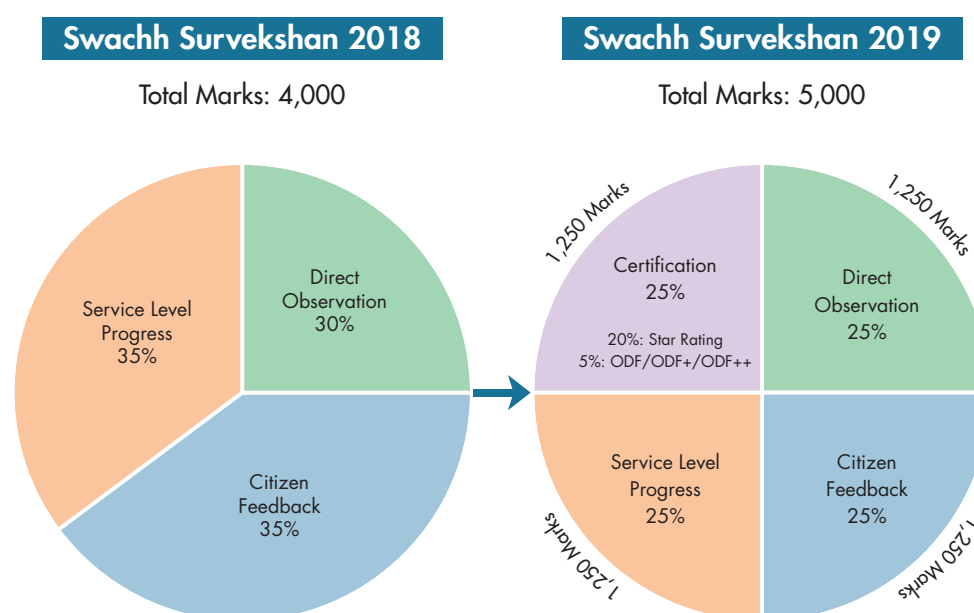
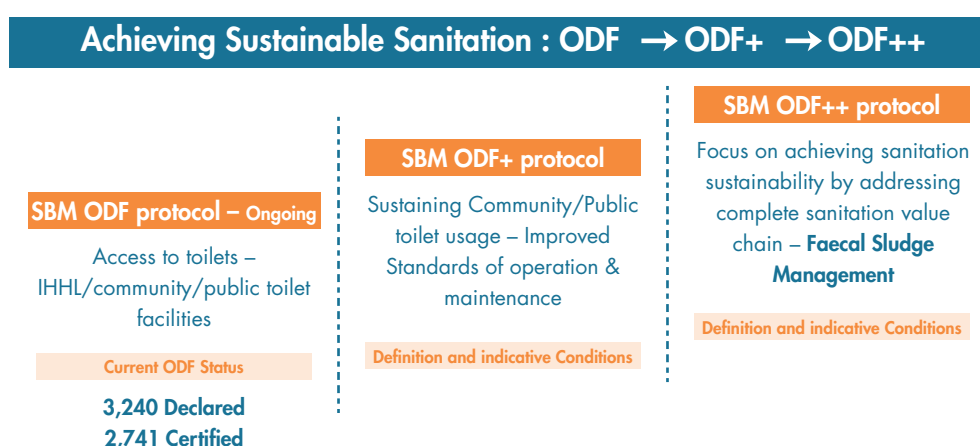


Image- Reforms in the internal structure of SSE structure from 2018 to 2019 reflect the growth in sanitation standards on a national scale. For instance, inclusion of Certification (Including ODF/ODF+/ODF++ and star rating) reflects that targets for ULBs are moving from merely tackling open defecation (or at least getting ODF status that declares that there was no incidence of open defecation the city) to second and third order waste management stages which incorporate long term impact and sustainability in their thought processes, systems and functions.

Source- 2019 Swachhta Survekshan Toolkit, Ministry of Housing and Urban Affairs



Pushing up the benchmark of ODF status for cities, the SBM ODF+ and SBM ODF++ protocols include “sustainability aspects including improved access to individual toilets, community and public toilet maintenance, functionality and liquid waste / faecal sludge and septage management (FSSM).”<sup>25</sup> While the focus of SBM ODF+ protocol is on sustaining toilet usage by ensuring their functionality, cleanliness and maintenance, the SBM ODF++ protocol focuses on achieving on

<sup>25</sup> op cit.



sanitation sustainability by addressing complete sanitation value chain, including safe and complete faecal sludge management. The reform in benchmarks and revisions in protocols point to dynamism within the process of structuring the Survekshan and using it as a vigilance mechanism. A deeper look at the process of carrying out the Survekshan and the effects it induces provides an entry point for a critical analysis of the lifeworld of policy implementation. Analysing the structure and consequences of Swachhta Survekshan provides the first steps into this exercise.

## **Making policies work: Analysing the Structure and consequences of Swachhta Survekshan**

What does an evaluation mechanism like Swachhta Survekshan enable? With a survey of this scale and nature, both potential and pitfalls are likely thereby creating intended and unintended consequences in its wake. Additionally, delving into the function of SSE enables us to ask pertinent questions about the capabilities and challenges within extant governance structures as standardized benchmarks and national aspirations come face to face with local contexts and ground realities.

According to a senior member of the Project Planning and Implementation Unit of QCI, the first organisation that carried out the SSE back in 2016, “the purpose of Survekshan was to encourage cities and not merely ranking...it builds momentum to do something progressive because a competitive environment is created.... [...].. Last four years of work has pushed the urban sanitation agenda in India unlike any other previous initiative, where we have come to imagine that India can look like Singapore. When the path-breaking *Almita Patel vs Union of India* judgement came out in 1998<sup>26</sup> nobody knew what effects it would have down the line, today we have the 2016 Solid Waste Management Rules. More than ranks, what SSE is trying to build is a long term commitment towards increasing the threshold of ULB services and functions, building new models of doing things, investing in public health and sanitation on a national level.”<sup>27</sup>

Yet the catch within SSE of assigning ranks or creating labels often induces a complex politics of categorisation. For instance, ODF or Open Defecation Free may be understood in generic terms as the eradication of defecating in the open without safe and hygienic sanitary provisions. However, under the Survekshan, the category of ODF was tailored in very specific ways to shore up marks. Subsumed under the service level progress component, ODF status in the Survekshan was scored on the basis of infrastructural provisions or service delivery mechanisms like number of registered de-sludging operators, presence of sewage treatment plants, revenue sources for O&M of infrastructure, percentage of applications that have been uploaded on the SBM portal, percentage

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<sup>26</sup> See *Almitra H Patel v. Union of India* (1998) 2 SCC 416

<sup>27</sup> Personal Interview, 31st August 2018.

of completed IHHL targets among others. While in IEC activities ODF was being popularised through awareness about preventing practice of open defecation, within the Survekshan structure it was mapped and marked through proxy indicators which focused entirely on the city's infrastructural capacity.

Similarly, while the need for setting standardized benchmarks is a systemic need for policy implementation, a common concern expressed by industry experts as well as ULB officers from different cities has been towards the idea of standardised templates within the evaluation survey for cities at significantly different scales. As noted earlier, the SSE divides the rankings into zonal rankings for cities up to 1 lakh and national rankings for cities falling above 1 lakh category. This makes the national rankings extremely broad and allows for cities like Jaipur or Ahmedabad (with populations falling in the range of 30-55 lakhs respectively) to compete with metropolises like Delhi and Mumbai (whose populations is more than ten-folds i.e. 1.9cr and 1.8cr respectively). Despite having markedly different demographics and compositions, these cities were competing to score marks in the same ranking schedule. Officials from the Project Implementation Unit at East Delhi MCD<sup>28</sup> put the complexity produced through this schema in perspective, "Comparison has to be among equals...but everything is made for average and not the exceptions. Within Delhi, there is massive diversity between each zone on issues of density, funding, challenges, population, demographics. In EMCD 90% dwellings are unauthorised, we service 44000 people per sq./km with a predominantly LIG group that has low levels of public awareness and dearth of open land as opposed to SMCD which services 8000 sq./km or NMCD which services 12000 people sq/km. There is no relaxation for population density while there should be. Plus, our ULBs are currently facing massive deficits in revenues."<sup>29</sup>

Given this diversity not just amongst cities but even at the ward level, how do we make criteria that account for comparisons sensitive to density, finance, illiteracy levels and unplanned development. Cities like Delhi are further fragmented on the account of administrative purview where key resources like road networks, land, water, slums all fall under different government units apart from the fact that the tussles of authority between state and central government make decision making and inter departmental coordination harder to execute. This differentiated context is subsumed under the standardized template that SSE provides by giving marks for services and facilities that may have no relevance for some cities as opposed to others. For instance, creating a waste to energy plant carries

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<sup>28</sup> Different areas within the national capital are serviced by designated authorities which could range from Municipal Corporation of Delhi (MCD), Delhi Cantonment Board and New Delhi Municipal Corporation (NDMC) to Public Works Department (PWD). Within the MCD, there are further sub-divisions for each zone i.e. North MCD, East MCD, South MCD and West MCD producing tussles over authority, finances, control and decision making.

<sup>29</sup> Personal Interview, 12th November 2018.

marks that will be yielded by metropolises which produced massive volumes of waste and thus require such units as opposed to smaller cities who might not need the same provisioning or have come up with decentralised waste disposal solutions.

Municipal financing and urban management expert, Ravikant Joshi, points out that a more nuanced criterion could help in creating a better evaluation schema. Joshi argues, "Every city is unique but you can't have spatialized generalisations. For instance, Leh will have different kinds of concerns for its solid waste management depending on its geography, density, challenges. We need to set benchmarks but we can have different categorical generalisations within that...[..] even if we were to make 8-10 differential groupings like Mega cities, bigger cities, smaller cities – it will make for a better more context specific comparative scale."<sup>30</sup> A key point linked to this idea is about the relative authority that local bodies can yield. Bigger cities with Municipal corporations that hold much more power cannot be easily compared against comparatively smaller municipalities. Most states will have both established via legal acts but municipal corporations hold much more power in terms of rules to hiring staff, their jurisprudence and generating revenues through taxation. A categorical segregation, as Joshi suggests, may be able to incorporate the demographic context as well standing of municipal authorities in more realistic manner.

Another crucial domain that needs to be addressed is that of municipal financing. SBM proposes a funding structure of 62009 crores, out of which 14623cr are to be supplied via central allocations and 4874cr by state funds. This financial support has to be necessarily directed toward infrastructural development through toilet construction and IEC activities. The rest of the funding must be raised by the ULBs through CSR funding or private investment. This leads to a number of complications. First, it creates a crippled scenario for ULBs that have been constantly running in deficits and have negligible resources for raising own source revenue – Joshi gives the example of poorer states like Bihar and Orissa where ULBs have almost no way to generate own source revenue and are dependent to almost 90% on the state funds to run the municipal functions and servicing the city as opposed to ULBs in Gujarat like those in Surat or Baroda which may still be running on 50-60 % dependency.<sup>31</sup> It is anybody's guess how weak and financially deficient ULBs perform on SBM and SSE that are pushing cities to rapidly invest in building local capacity and technical expertise in order to fare well in the rankings.

According to Joshi, "In order to build the capacity of ULBs, there needs to be a real shift in thinking. Real money will be required to have a 365 days' effect rather than the temporary solutions being thought of now. I need to calculate the cost required to maintain 24X7 level of service= Y amount and then find a sustainable and realistic way of generating Y. That preparedness and rationality is lacking at the ULB level where work for Survekshan is a window dressing for a once-in-a-year exam

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<sup>30</sup> Personal Interview, 14th November 2018.

<sup>31</sup> Ibid.

rather than a consistent learning that is geared towards long term planning. We need ULBs to think that they need to give consistent and adequate services but this environment of competition doesn't allow for that."<sup>32</sup>

Apart from this discrepancy, another unintended consequence produced by the examination approach within the survey process is that of informalisation of labour to service a growing body of infrastructure. With no financial provision for hiring new staff or giving salaries in the central allocation, there is possibility of further informalisation of labour at the lower level of ULB functioning. The online portal handled by the Ministry of Housing and Urban Affairs states that 5464727 Individual Household Toilets and 464250 Community toilets/Public Toilets have been created under since SBM was launched.<sup>33</sup> Often construction of toilets and acquiring ODF status are touted as symbolic substitutes for measuring the effectiveness of SBM. A large pitfall with such an approach is the singular focus on thinking of building toilets as a measure of policy effectiveness rather than focussing on a more holistic approach where the full cycle of sanitation and waste is tackled. Additionally, the construction and O&M of new infrastructure as well as prepping for Survekshan adds more strain on an already resource strapped local body.

What happens as an effect is that ULBs reel under pressure to disburse the added responsibilities of both SBM and SSE to existing employees or scramble to look for temporary solutions through informal labour contractors. For creating the requisite documents and preparedness ahead of Survekshan, ULB have been pushed to add to the responsibilities of their existing workforce of officers, engineers, sanitation or health officers while the upkeep of the massive volumes of infrastructure created over the past few years has fallen within the existing force of *safai karamcharis*- most of whom still work on ad-hoc or contractual basis with no sense of social security. Meghna Malhotra of Urban Management Centre, a private consultancy like many others who have been hired by ULBs which have the financial means to hire external help, highlights that there is an "infrastructure and workforce mismatch."<sup>34</sup> Despite the ongoing National Urban Livelihoods Mission, no synergy has been created to link livelihoods to jobs- rather municipal authorities across various cities have had a reactionary approach to creating and maintaining civic infrastructure. Ravikant Joshi, who also works with UMC as a senior consultant in helping ULBs to navigate the arduous terrains of SSE preparation, reasserts the increasing presence of this trend. Joshi notes that Survekshan exercise often leads to a panic ridden contractual or informal hiring by ULB in order to spruce up the city for the impending examination.<sup>35</sup> Hence the opportunity of a long term structural improvement for ULBs is lost out to outsourcing quick solutions.

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<sup>32</sup> Op cit.

<sup>33</sup> <http://swachhbharaturban.gov.in/dashboard/>. Accessed on 8th February 2019.

<sup>34</sup> Personal Interview, 14th August 2018

<sup>35</sup> Personal Interview, 14th November 2018.

Interviews across ULBs from Jaipur, Ahmedabad, Delhi, Bhopal and Indore reaffirmed that there is growing pressure on officials from expanding workhours and responsibilities. On being asked about the pressures associated with SSE and how ULBs deal with it, a top official with the Bhopal Municipal Corporation joked about having two angioplasties done in the last few years.<sup>36</sup> While the remark was anecdotal, it indicates the pressures under which ULBs service cities on an everyday basis. This pressure takes on mammoth proportions during the month long period of field visits across cities according to a pre-decided national calendar which is part of the third party evaluation. ULB officials across cities stated an expansion of work hours and overload of duties which could span from inter departmental meetings to patrolling of common open defecation spots in the city by even senior ULB officials. This was done to catch and penalise defecators as third party visits approached and ensure that assessors did not come across any incidence of defecation during their field visits. ULB officials from Amalner, Maharashtra spoke of using police patrolling as well as moral coercion while officers from other cities said they used stern warnings often followed by charging hefty penalties and threatening defecators with jail time if they were caught.<sup>37</sup> However, this environment of strict vigilance points to panic driven window dressing- whether in clearing out of OD spots or refurbishing public toilets- in hope of projecting a spruced up city whose fragility and cracks are creased out of the picture during third party investigation, even if for a few days.

Yet it is through the lens of exercises like the Survekshan that the gaping holes in municipal capacity get revealed. For instance the Jaipur Nagar Nigam had to depend on support from non-governmental organizations to upload beneficiary details in the ULB's online database in order for the held up SBM subsidies for Individual Household Latrines (IHHL) to be released.<sup>38</sup> Beneficiaries and the local staff of NGOs rued of financial slumps in SBM subsidies to beneficiaries ahead of the Survekshan, as Jaipur Nagar Nigam vied for ODF status and attempted to show all applications for IHHL needs as resolved on its municipal website, temporarily blocking channels any new incoming applications. Residents of informal settlements like Sarai Bawari and Chawan ka Mand that lie on dry and dusty peripheries of Jaipur's Amer region claimed that they had to wait up to a year to get subsidies to build toilets, which took multiple visits and angry protests at the municipal offices.<sup>39</sup> This lag in subsidies was not limited to single case scenarios but was reported between the subsequent subsidy instalments as well.<sup>40</sup> The processual lag caused a strain on lives of households undertaking self-construction of toilets under SBM in multiple locations especially in informal settlements, given the vagaries on weather, labour availability and cost spikes.

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<sup>36</sup> Personal Interview, 4th December 2018.

<sup>37</sup> Excerpts from panel discussions in MHT's national level workshop on urban sanitation titled 'Promoting Joint Action Towards Swachh Bharat Mission' held on 4th May 2018 at India Habitat Centre, New Delhi.

<sup>38</sup> Personal Interview, 16th August 2018

<sup>39</sup> Personal Interviews with beneficiaries from Chawan ka Mand, 16th August.

<sup>40</sup> Ibid.

Thus the intense focus towards the coveted ODF status could itself become a channel to hinder service delivery on ground where open defecation and unavailability of safe sanitary provisions still remain a reality.<sup>41</sup>

Further, it is not just ULB capacity but the internal structure of SSE that raises concern. The reliability of having independent and trained evaluators for on- ground inspection remains limited since evaluating organisations hire assessors on contractual basis to be deployed on ground. How independent this on ground evaluation is, given that assessors are accompanied by top city officials and ULB officers throughout their visit, is still circumspect. Another issue is that of interfaces and data collection mechanisms. The insistence of scoring citizen responses on Swachhta app or the online portal alienates those who are unable to navigate this technology and simultaneously invisibilizes the complaint resolution through established networks like phone lines maintained by municipal authorities- which maybe more accessible but for which the evaluation criteria provides no extra marks. Often this leads to ULBs pushing city residents to register complaints on mediums recognised within the SSE criteria; especially ahead of the examination when superfluous complaints are often reported and resolved in record time. Additionally, the use of digital mediums like Swachhta App developed by MoUD as well as the recently launched Swachta Manch, web-based platform that engages stakeholders to create/participate in volunteering opportunities are technologies that are popularised on transparency factor. But these very facilities end up alienating a much wider proportion of the population for whom online processes and mechanism produce entry barriers and navigational hurdles rather than easing the process.

In some case, prejudices in the marking criteria favour customary completion of processes even at the risk of being unfair to a more sustainable process. Swati Sambyal notes that with maximum weightage given to collection and transportation of waste under service level progress in 2018, centralised models of waste disposal in cities were marked higher than those in Alleppey and Thiruvananthapuram where more sustainable, decentralised systems of waste management through segregation at source and composting were being put in place.<sup>42</sup> Noting what SBM does not focus on and which SSE does not prioritise are revelatory in the sense of new blind spots being produced in current agendas. Does the toilet centric focus allow for looking at the bigger picture of sewerage treatment and sanitation infrastructure. How do we account for adequate 'Operation and management' of toilets across cities when the planned sewerage network in cities itself remains patchy and outdated? SBM begins to work through creating key tools yet misses the mark on thinking at the scale of systems.<sup>43</sup>

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<sup>41</sup> Most cities, though declared to be ODF, still suffer from incidence of open defecation as well as manual scavenging. For a critical discuss of SBM implementation. See, <https://caravanmagazine.in/reportage/swachh-bharat-mission-heading-failure>. Accessed on 7th January 2019.

<sup>42</sup> Swati Singh Sambyal, 'A clean miss', Down to Earth, 7th June 2017.

<sup>43</sup> Deepak Sanan, 'Swachh Bharat Mission: another futile toilet chase?' Down to Earth, 21st September 2016.

Can universal toilet coverage produce lasting outcomes if the ecosystem remains defunct and the cycle of waste management is not dealt with in its entirety? With 2019 Survekshan moving beyond ODF to ODF+, ODF++ and star ratings for waste management solutions, pushing up benchmarks holds the risk of dressing up deeply structural issues by ULBs in order to remain relevant in the Survekshan. The internal structure of the Survekshan as well as the conditions created for ULBs to function within the shadow of the survekshan brings out deeper points of inquiry about ULB capacity and local governance mechanisms. While these instances indicate towards the growing pains that ULBs undergo as they deal with the monitoring and evaluation process actualised by the Survekshan as well as the reactionary decisions they are often forced to make in order to tackle these challenges, the evaluation schema so developed has also provided avenues for learning and building local capacity. What these are and how these inform the future may illuminate pathways to keep the survekshan's evaluation mechanism open to self-reflection and adaptation.<sup>44</sup>

## Keeping Evaluation mechanisms self-regulating and reflective

Through its monitoring and evaluation system, Survekshan attempts to put the cities under its the radar with respect to the provisions made under Swachh Bharat Mission and the 2016 Solid Waste Management Rules. Despite the pressure it generates, ULB officials across Delhi, Jaipur, Bhopal, Indore and Ahmedabad agreed on the creation on a competitive environment amongst municipal authorities across cities that has never existed before. Simultaneously they collectively agreed that the citizenry had become more aware and habituated to maintaining basic hygiene, asking upon their cities' municipal authorities to comply as well.

While this created added strain on existing ULB resources, it also built the scope of local capacity building and finding innovative solution to urban challenges -a case we see in Indore, which has consistently outranked all other cities on the Survekshan Ratings to become the 'cleanest city in India' in 2016 and 2017. The SBM Mission Director for Madhya Pradesh, argued that this was due to the strong foundations that were built for this achievement over a period of six years as he exclaimed "*Indore ko Indore Banayagaya*"<sup>45</sup> (Indore was made Indore). A city that according to him has become a brand; Indore stands in for cleanliness and effective service delivery by the municipal corporation so much so that it has attracted both tourism and industrial investment like never before. From building infrastructural resources like waste collection tippers of optimized sizes to building

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<sup>44</sup> Personal Interviews were conducted with ULBs and associated personnel in Ahmedabad Municipal Corporation (AMC), East Delhi Municipal Corporation (EDMC), Bhopal Municipal Corporation (BMC), Jaipur Nagar Nigam (JNN) and private consultancy team supporting Indore Municipal Corporation (IMC) over August-December 2016. The ULB officials did not wish to be named.

<sup>45</sup> Personal Interview, 4th December 2018



cutting edge waste segregation and disposal capacities and ensuring that the technical know-how cross cuts across all levels of municipal workforce reaching up to top city bureaucrats—Indore speaks of a story of success that has emerged from the pressures that pushed for local capacity building.<sup>46</sup>

With a leading private consultancy providing the necessary handholding support, unwavering backing from political fronts and initiative by top level bureaucrats, Indore today boasts of 100% door to door collection against a user fee of Rs.3 a day. According to members of the consultancy team<sup>47</sup> spearheading Indore's Survekshan preparation since 2016, the city has created a foundation by habituating the citizenry to judicious waste management both on individual and city level<sup>48</sup>—a habit that they think that will transcend changes in electoral fortunes or perhaps even the proposed rollout of SBM in October 2019 on Gandhi's 150th Birthday Anniversary. The co-creation of a civic habitat towards maintaining cleanliness and innovation in waste management has allowed Indore to push forward for star rating and ODF++ status in 2019 Survekshan.



Images. Posters and advertisements line walls across Indore city to alert the citizenry about the impending Survekshan in January 2019 and the urgent need to maintain the city's leading rank. Source- Author's own, 6<sup>th</sup> December 2018

The creation of local capacity and technical expertise across multiple levels within Indore Municipal Corporation and close collaborations amongst ULBs, NGOs and civil society organisations is an indication of prospering environment where networks within multiple actors in the city are being reconfigured as a means for policy implementation to complete the last mile delivery. On being asked

<sup>46</sup> Officials directly involved in the SBM implementation pointed out that Indore possesses completely mechanised segregation, decentralised segregation, 10 Transfer stations, 2 Bio Methanation plant, 600 Decentralized composting units and over 25,000 home composting units.

See, <https://swachhindia.ndtv.com/waste-management-indore-uses-gps-enabled-wrist-watches-for-effective-garbage-collection-23864/>. Accessed on 29th December 2018.

<sup>47</sup> The Madhya Pradesh government has hired support of a leading private consultancy for all the cities across the state for effective SBM implementation and Survekshan preparation.

<sup>48</sup> Personal Interview, 6<sup>th</sup> December 2018.



about the trade-offs emerging out of this intense focus that Indore developed for SBM implementation and Survekshan readiness, official sources confessed to a lag in the housing provisions under PMAY rollout as political attention and state resources were diverted to SBM and SSE without question. Trade-offs and opportunity costs hence still remain important considerations when thinking of urban challenges in a holistic manner.

What emerges is the fact that evaluation process has not just improved sanitation provisions and public awareness but created the new challenges in its wake which need resolution. First, there needs to be a realisation about the catch with online mediums and who it invisibilises. Those at the margins may be the population who are in the direst need of policy benefit, but digital technologies may undercut their ability to participate in gaining benefits (e.g. Checking the status of one's application) or providing their feedback because of not being well versed with app based platforms. Hence the rhetoric of online is good needs to be checked for the unintended hurdles it creates. Second, reflection of the ranking systems and breaking it down into more nuanced categories may provide a more realistic picture for those competing as well as those making comparisons and inferences from these rankings. Survekshan evaluation mechanism has shown the ability of being reflective and hence needs a bigger push to introduce more rigour in its internal categories. Third, the potential of partnering with civil society organisations and NGOs for generating awareness and reaching communities through IEC remains underdeveloped. This under developed domain currently carries potential for collaboration and sharing responsibility for effective policy implementation. Behavioural change towards sanitation practices and investing in public health is a long term process. Hence looking for easy and quick results is a detrimental approach in the long run. Focusing on more democratic forms of civic engagement and partnering with NGOs to deliver on this promise can allow for more sustainable and far reaching effects.

**“How does the SSE allow us to critically think about policy implementation? Can we use this as a lens to revisit the local realities of our governance and administrative infrastructure? How does an evaluation mechanism bring into picture sustainability as a keystone in our policy outlook?”**

Swachhta Survekshan has not only merely been catalyst for SBM implementation and a vigilante for maintaining a check, but also maintained a self-regulating mechanism that allows policy makers, ULBs and citizenry to be more reflective on current conditions and setting targets for the future. Consistent refinement of the parameters and the indicators through which data is captured has allowed for the possibility of keeping the door for discussion open within the SSE schema. For one, it brings the concept of sustainability back to the centre stage. Building toilets alone is not going to fetch marks or suffice for eradication of open defecation or manual scavenging if access to safe sanitary provisions and management of the wastewater and faecal matter within these units are not taken into consideration. Including Sustainable sanitation as a category with

25% weightage under service level progress is an effort to reorient ULBs to keep their focus on segregation, processing and sustainable ODF. The inclusion of enforcement of byelaws as another category under service level progress attempts to create synergy within SBM protocols and existing municipal frameworks, thereby incentivising ULBs to ensure existing byelaws are followed. Further, introduction of a new parameter altogether in the form of Certification including (ODF+/ODF++/ODF+++) and star rating creates benchmarks for cities to move towards aiming for waste reduction at the source of generation as opposed to singlehandedly tackling waste management. These developments set aspirational benchmarks for sanitation sector which is under transition, but can also run the risk of being addressed through lip service and window dressing rather than tackling the malaise of structural rot.

While it remains to be seen how projections and politics play out in the fierce competition for the much publicised rankings, a detailed study of the Survekshan builds inroads for reflecting on the potentials and limitations of urban local bodies, modular solutions and city dynamics through lens of policy implementation and evaluation. Will it be possible to use this momentum to build knowledge transfer between different urban local bodies across cities? Can models of innovation be transported and retrofitted to suit different cities? Do temporary solutions stand a chance to improve or further destabilize local machinery for policy implementation? With October 2019 as a proposed rollout of SBM, the learnings from SBM implementation, data collated through Survekshan and the survey mechanism for monitoring cities leaves a scope for immense learning and reflection. It also provides a window to look at the incremental work of running cities, improving infrastructure and transforming civic behaviour.

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