

Can we improve accountability through participation? Practical Action's Learning

*Mansoor Ali*¹

Abstract

*Participation of citizens is often seen as one of the pathways to improve accountability. Many NGOs and donors programmes are designed to mainstream participation in the planning, design, choice of technologies, ownership and management of the physical assets. Various methods and approaches are developed and claim to be successful on both enhancing participation and improving accountability. Good participation aims to change the relationship of demand and supply between citizens and their service providers to one of mutual accountability. In the last 8 years, Practical Action, an international NGO, has been testing participatory approaches to better deliver basic services. More recently Practical Action has scaled up participatory approaches to address components of good governance, such as improved accountability and collective decision making. This paper is based on the key learning of Practical Action from its projects, its situation analysis research and its learning and networking activities with other NGOs in the UK. This paper presents a synthesis of this learning around a guiding question; **Can we improve accountability through participation?** This question was examined at 4 levels;*

- 1) The local level, citizens and their organisations*
- 2) Municipal governments*
- 3) National governments*
- 4) International financing institutions responsible for funding large programmes and driving institutional reforms*

Key Words

Participation, Accountability, Participatory Planning and Community Organisations

¹ Practical Action's projects are used as the context, but the views expressed in the paper are of the author and may not present the organisational position.

INTRODUCTION

Millions of poor women, men and children in developing countries do not have access to WASH services (check latest MDG review figures). There are many reasons for this alarming situation and one of the common causes is the absence of an accountability relationship between citizens and service providers. This means when resources are available, citizens could not ask how and where resources should be used. In addition the available resources are misused and citizens could not monitor their use. Accountability is considered as a key component of good governance. In its wider definition governance includes democracy, rights of citizens and accountability of power holders and government institutions. Governance has been prioritised by many donors to ensure that external aid has a sustained impact. For example, capabilities of governments to serve citizens, accountability of various systems and ability to respond is included in the framework used by DFID in its analysis (DFID, 2006). The key processes through which good governance can be achieved include policies, legislations ensuring participation, accountability, access to information, open and accessible institutions and rule of law at all levels – local to global. This paper is about the processes of participation to achieve the outcome of accountability in the context of WASH services. **This paper is prepared for the symposium theme concerned with ensuring accountability in provision of WASH services and focused on links between existing practices of promoting participation and its impact on improved accountability.** The paper is based on learnings from Practical Action's projects and its wider learning and networking activities with other NGOs in the UK. Practical Action is an international NGO which works in 7 developing countries on promoting appropriate technologies and systems for poverty reduction. To set the scene the following section explains Practical Action's understanding of participation and accountability and the relationship between the two.

Participation is the process to involve citizens, to use their knowledge and to empower them to make decisions about services relevant to them. Participation is also about incorporating views of the weaker groups and building participatory systems within institutions, which could sustain. In practice, participation starts with the provision of background information and knowledge to people in a form that they can understand, at a time they need it, and then involve them in the rest of the process if they so wish. To enhance participation in a changing environment, citizens may need information at different times and in the changing forms and participation of the weaker groups should be included as a compulsory activity in development practice. It is often claimed that good quality participation is a pathway to the empowerment, it builds people's ownership and creates trust between the users and providers of the services. A range of literature has been produced on how to promote participation (for example, Chambers, 2008 and Hamdi 2010), as well as on the quality of the participatory process, measuring impact of participation and value of local knowledge and learning from below. Methods to enhance participation of the women, children and vulnerable groups have also been subject to research.

The attitudes of the facilitator and an environment favouring participation are mentioned as necessary conditions to ensure participation.

In WASH services, participation is encouraged for various reasons and at various levels. At the household level it is about choosing the type of technologies, deciding on affordable costs and selecting among the methods of delivery. It is also about actively understanding the hygiene messages, embracing some of those and changing behaviours. At the level of neighbourhoods it is about collective organization of people and planning WASH systems with people who are actively involved in the users committees. Collective participation is seen as an important element for developing a vision of the physical area and demand WASH services from the governments or other service providers. However, participation of the citizens must not be restricted to the household and neighbourhood levels. It is also about developing systems and having institutional arrangements through which poor people meaningfully participate in the decisions at the level of cities and towns. They should be offered ownership at various levels of development, from planning to reviewing development programmes. Participation is about enhancing ability of the systems to involve citizens in larger decisions and explaining implications of those decisions, for example, about institutional reforms, tariff setting and rights of the citizens in WASH services. Participation is promoted for many practical reasons such as to enhance the ownership of physical assets, to contribute to the proper operation and maintenance of the physical infrastructure and to help achieve better partnership with the service providers. This can lead to more regular payments for the services. Active participation is also promoted as a right.

Recognising that both participation and accountability are important for the WASH services, this paper is about impact of participation leading to improved accountability relationship between service providers and service users.

This paper is an account of Practical Action's experiences in promoting participation of the poor in WASH services and then using that in creating systems of accountability on service providers. Participation is an essential component of Practical Action's working. The start of this journey goes back to 1980 when Practical Action (ITDG), a an international development organisation based in the UK and works in 7 developing countries involved women households in the design of stove technologies and its subsequent promotion. In the 1990s when Practical Action's work began in urban slums, participatory approaches were used at the household levels. However, since many WASH services require collective action, it promoted participatory planning at the neighbourhood level. In this phase of work, Practical Action has also been involved increasingly with government, especially in urban areas, as many WASH services are provided and regulated by government agencies. In 2000, Practical Action developed greater recognition that households, neighbourhoods and service providers are all part of a system; and, an understanding of this system is crucial to improve access to services, sustainability and impact. This very much laid the foundation of its current framework concerned with participatory governance. The methodology of this paper is a qualitative analysis of Practical Action's work in promoting and analysing participation at various levels. This includes its participatory planning

approach and strengthening of community organisations at the neighbourhood level as well as understanding participation from the municipal government's perspective, understanding bottlenecks to participation and accountability in nationally-driven programmes and assessing participation in practices of International Financing Institutions. This paper is based on analysis of our various evaluations, research and desk studies, which were carried out as part of the projects.

DISCUSSION

Participation through planning

Since 1998, Practical Action has been working with the organisation of poor people to empower them to prepare plans for their neighbourhoods, towns and districts. The process is facilitated through various participatory methods in a series of sessions. Poor people come together and agree on common needs for their neighbourhoods. With the right facilitation, participatory plans are prepared in the community and provide an opportunity for all, especially women and children, the old and disabled to get involved in decisions. Practical Action used participatory planning as a process to strengthen community based organisation, overcome conflicts (Taha and Coupe, 2010) and to promote external partnerships of the community. Community organisations, with an agreed plan of the area including technical details and cost estimates, influence municipal resource allocation and lead to some investment on physical infrastructure in line with the priorities of the people. Municipal investment then leads to improved security of tenure of the area. For example, between 2004 and 2008, local government in Kitale, Kenya used participatory plans prepared by people with the facilitation of Practical Action to acquire additional financial resources from the national government. These resources were then used as per the needs identified by the slum dwellers. In Faridpur, Bangladesh community based organisations from various ethnic groups came together and developed participatory plans. In addition to the allocation of resources, when a national campaign to demolish slums was undertaken by the interim government in 2008, slums in Faridpur were not targeted. One of the reasons for that was municipal investments and organisation of people. While in Harare, Zimbabwe participatory planning could not stop the massive slum eviction in 2006, but it helped people in recovering their livelihoods and rehabilitating them in their new settlements.

Recently in slum areas of Nepal, Bangladesh, Sudan, Kenya and Zimbabwe this approach is being used to improve WASH facilities. Participatory planning triggered community initiatives to understand their own responsibilities as in Community Led Total Sanitation (CLTS) processes (CLTS, 2008), articulate their needs and open channels of communication with other service providers, such as local authorities, private sector and NGOs. Slum dweller representatives in Faridpur are now members of municipal level decision making, as they have collective representation and have technical details which they can present. Slum dwellers in Colombo lobby for flood relief funds as they know what needs to be done, what is their own responsibility and what additional resources are needed. This approach enables communities to

access better water and sanitation services, improve and sustain their hygiene behaviour and engage with those who can potentially assist them. It also builds capacity in communities to understand and take responsibility for operations, maintenance and after care. So far, Practical Action has involved at-least 0.5 million people in the participatory planning process.

Whether participatory planning has improved the accountability or not?

For this paper we have analysed our project reviews, reports and other outputs to answer the question whether participatory plans have initiated a relationship of accountability between slum dwellers and local authorities? Before we share our observations, it is important to note here that Practical Action used participatory planning to achieve appropriate choice of technologies and systems at the neighbourhood level. The outcomes on the accountability relationship with the municipality were not actually planned and gradually emerged as a result of the facilitation on the planning process. Following are some of the findings from our analysis;

- 1) Local government staff were trained and brought to the slum areas to undertake planning with the community groups. For example, in the case of Butwal, Nepal, such an interaction happened for the first time. This opened up channels of communication and then trust. Initially, this communication was around the needs and demand of the people representing the traditional role of the governments. Gradually the communication has changed to more specific topics such as the technical standards of the municipal governments, lack of resources and affordability of the poor people on WASH services. There are clear indications that this engagement took the form of what slum dwellers and local authority could do together to improve the slum area.
- 2) An agreed participatory plan presented by a representative community group opened up channels of negotiations. These negotiations were initially on the details of technologies, systems and details of arrangements, for example on tariffs. Practical Action sees indicators of negotiation as an important indicator of accountability relationships. In Nepal, community groups convinced local government to allocate public land to build a community centre and improved the water storage and supply. In Bangladesh, large water diameter water supply and large drainage was provided by the municipality in Faridpur, while community groups laid the pipes and constructed water points. But, all local governments are not equally good in receiving such plans and listening to the community. Our experience suggests that presenting plans opens engagement with some of the most difficult municipal governments if the political support is available.
- 3) The negotiation process could lead to various concrete outcomes. In the case of Practical Action's project it led to the allocation of municipal resources to help implement parts of the plans. The municipality in Faridpur leased land to the community and allocated a sum of US \$ 150,000 (in 2007) to implement some key components of the participatory plans. Allocation of municipal financial resources as per participatory plans was another important indicator of the changing relationship. However, it is important to admit that in none of our projects has participatory planning led to regular participatory budgeting process to

allocate budget. Municipalities need to be first convinced on the value of the process and then need capacity and resources to undertake that beyond the project.

- 4) Plans do lead to some actions, and in the case of Bangladesh, community organisations were given the role of monitoring the quality of the construction of a contractor selected to implement a WASH contract. Practical Action provided training to the community group on monitoring the quality of the material, stock taking and quality of construction. The community decided to monitor this at the key moments, for example the proportion of cement in the mix, quality of curing and the strength of the pipes. In case further guidance was required, Practical Action backstopping support was available. Since conventional municipal procedures and engineering standards do not have space for community monitoring, the mayors had to make special exemptions for this. Apparently community monitoring of resources and their use through contracts, must have an impact on kick-backs. However, we have no systematic evidence to demonstrate this and compare it to the situation where community groups were not organised. Collecting such information is extremely challenging.

Our overall answer to the key question; ‘Whether participatory plans have initiated a relationship of accountability between slum dwellers and local authorities?’ is yes, but a lot depends on how such a process is carried out on the ground, the ability and leadership of the community organisations, leadership in the municipal council and the local institutional context. We are certain that a few dimensions of accountability have had an impact. And from our experience, it may be concluded that participatory planning provides an opportunity and brings out certain successful principles which can be developed further in constructing accountability systems. Participation through planning opened up venues for engagement and negotiations and helped in the allocation of financial resources as per the needs and priorities of the poor people. It opened up space for communities to monitor the municipal contracts. This was all achieved within the project period and provides examples of good practice. However, we have no evidence to suggest that these practices were adopted and mainstreamed by the municipal governments in the project locations or elsewhere. There is more evidence that some of these practices were adopted partially. More systematic research and evidence generation is needed. Practical Action is keen to work with research organisations to study such processes beyond the projects. Without such an understanding, scaling up and mainstreaming of such practices will remain an important challenge.

Participation through Strengthening Community Based Organisations

We have observed that even before project interventions, organisations of people exist in various forms, such as faith based organisations, ethnic organisations, savings groups and organisations formed by previous WASH projects. There are also strong organisations of shopkeepers, market stall holders and groups belonging to the same occupation. In some cases,

local residents come together to receive and collectively pay for certain services, such as water or local security. WASH projects organise communities around a specific purpose, such as construction, operation and management of a water supply system. Community organisations once established could address larger issues such as land security of the area. Practical Action's projects, between 1998 and 2004 organised slum dwellers around process of participatory planning. This organisation was very much to prepare plans, set priorities for basic services and convey neighbourhood needs to the local governments. In Kitale, Kenya, such organisation fitted well with the priorities set by the national government and helped in allocation of funds as per local priorities. National Government set up funds such as the Local Authority Service Delivery Action Plan (LASDAP) to be allocated on the basis of priorities agreed through community consultation and presented by the community organisation. In Faridpur, Bangladesh, such organisations initially formed at the neighbourhood level, started saving and then gradually combined to represent various slum areas together in the municipal committees, to better monitor the priorities set and resources allocated for slum areas. In Faridpur, Bangladesh, this organisation is called Slum Improvement Federation (SIF) and is now registered with the government. Organisation of community groups coming together helped in effective representation and opened up channels for improved accountability with municipal governments and other institutions. Recognising the different needs of women, mothers groups were formed by the communities in Bangladesh and Nepal. Our experience in organising communities in Bangladesh, Kenya and Nepal suggest that the local groups played a key role in conveying the local needs collectively to the municipal governments, resulting in some tangible action. Basic services such as water, sewerage and street paving were provided. Whether organisation of people helped in improving and sustaining municipal accountability was not conclusive, as accountability may not immediately and directly prove beneficial. We learnt that accountability relationships started and sustained as long as organisation is sustained on something more tangible, such as savings or joint funds for operation and maintenance.

Participation and Accountability at the Municipal Level

Practical Action carried out research in various cities and towns to understand existing processes of participation and accountability at the municipal level and perception of the citizens about these processes. The purpose of these studies was to better inform our programmes and improve our understanding of various issues and perspectives. For this paper, we are presenting key findings from a study carried out in a secondary town called Jessore in Bangladesh.

Jessore has a population of 250,000 in an area of 26 sq-km. The municipality is well connected by rail, road and air with the rest of the country and serves as one of the key trade routes between Bangladesh and India. Jessore is situated in the midst of a vast agricultural production area and is a centre of produce distribution. Officially 27% of Jessore live in 65 slum areas, with very poor access to basic services and housing. Municipalities (Pourashava) in Bangladesh have

the responsibility to deliver services to their citizens. According to section 53(1) of Local Government (Pourashava) Ordinance 2008, fundamental responsibilities of the Pourashava include; providing urban services such as water and sanitation, ensuring participation of public representatives with government officials, planning and implementation of infrastructure development, building construction and town planning and ensuring security and managing disputes amongst citizens. The municipality has to publish a citizen charter with description of the particulars of providing urban services, conditions to have the services and time frame to ensure services are delivered. However, more than 50% of the population do not have access to basic services.

In 2009, Practical Action carried out a study in Jessore to understand the existing channels of participation, their effectiveness and relevance to the accountability systems. We analysed this within the municipality. Our key findings are presented below;

- 1) Although a number of NGOs are organising community groups in Jessore, there is very little evidence that they have been sustained over a long period and continue to have an impact on improved accountability at the municipal level. To have such an impact, a sustained organisation of people is necessary and the only evidence of this is that of market traders, who pay taxes and demand the services collectively. Thus, a relatively mature relationship of accountability exists between the market traders and municipal council, possibly because they have a tax relationship and the livelihoods of market traders are vulnerable to various municipal decisions.
- 2) While local taxation could provide a possible basis for participation and accountability, resource generation and budgeting process is very much constrained by the allocation of funds by the national governments. Using those investments for service delivery, converting this to resource generation and then agreeing accountability systems with citizens. The tax collection processes are weak due to the absence of basic information and there is evidence of a tendency for rich and powerful people to default on local taxes.
- 3) The nature of participation of poor citizens at various levels reflects a culture of 'needs, demands and projects to meet those'. Therefore organisation at the local level is often seen as a process of problem identification and the relationship is restricted to 'projects' only. For example, there are 9 municipal wards and 52 neighbourhoods in Jessore and each ward has a ward committee at the local level with a maximum of ten representative members, headed by a ward counsellor. These wards are used as the forums to discuss local problems at the grassroots level. Ward committees also provide a route to its members to join the permanent committees chaired by the mayor. However, these committees mostly discuss the donors programmes concerned with service delivery with not much influence on the key decision making, for example on budget spending, monitoring and analysing issues.
- 4) At the municipal level, a monthly meeting headed by the mayor takes place every month in the municipality where proposals are developed based on the needs identified by various

committees in the municipality. Members of monthly meetings are ward counsellors, members of permanent committees, responsible officials of different departments of the municipality, specialised professionals upon application and interested citizens or citizen groups upon application. At the monthly meeting, proposals are discussed in terms of their potentiality and priority of implementation.

- 5) The Pourashava works under the influence of national governments. More than 50% of the Pourashava budget comes from the them. Most of the taxes are collected by the national governments and all the new tax proposals need to be approved centrally Decentralisation policies aimed to bring more autonomy to the municipal governments and accountability relationships could flourish in this situation. However, municipalities are still constrained by the controls held by national governments.

Our key learning from this study is that systems of participation and accountability already exist within the municipal institutions. However, often WASH projects, start community mobilisation at the grass roots without recognising the potential of promoting accountability relationships with the existing municipal institutions. A study of these existing processes is fundamental before we initiate accountability and participation processes.

Nationally supported participatory programmes;

In addition to analysis of our own programmes on the support and participation of community-based organisations, we have also studied other programmes, where organisation of the people as groups was used as an approach to identify and deliver on local needs and to improve local accountability. One of those large scale programmes we studied was a national programme started in 2004 to support the formation of Citizens Community Boards (CCB) in Pakistan to build local participation through community groups to address the local issues. This was promoted to support the larger national policy on devolution of powers and received substantial donor support. A total of 10,000 CCBs were formed and registered across the country and a budget of Rs 8 billion (in US \$ 10 million) was kept aside by the national government. However, by 2009, more than 70% of the budget had not been used. Our analysis suggests that despite national policy support, CCBs were not effective due to insufficient support from local government staff, technical challenges and a limited capacity of CCBs members. The capacity building support to CCBs was not targeted to their actual needs. Political and elite influence were also observed in CCBs formation and function as most of the CCB leadership came from ex-NGOs, ethnic and religious groups. Whether CCBs have improved the accountability relationship was analysed at the 2 levels. At the national level, the effort to devolve and ring-fence large budgets for community groups provides evidence that the national government recognised this as a gap and made an attempt to shift the powers and accountability to the grass root level. At the local level, the design to deliver such an approach has failed because of its incompatibility with the local government systems, elite capture,

corruption and lack of technical capacity of CCBs to engage with the municipal governments. One of the key lessons we learnt from this analysis is about challenges faced by a policy of participation in delivering accountability on the ground without putting in place the right details. The policy and programme of devolution through CCBs could be a unique political vision to build participation and accountability from the bottom up. However, it may not have been compatible with the social and institutional realities on the ground. Similar to our findings at the municipal level, more analytical approaches are needed for development practitioners.

Global Institutions on participation and accountability;

Improved accountability is an essential component of most global policies and programmes. Organisations responsible for channelling substantial funding for basic services and infrastructure are particularly concerned about this. In 2006 DFID dedicated its 4th White Paper on International Development to Good Governance with more than half of its contents dedicated to participation and accountability (DFID, 2006). The World Bank's latest report (2010), *Silent and Lethal*, concludes that without improving accountability, infrastructure investments will not lead to poverty reduction in African States. A detailed analysis² carried out by the European Commission suggests that accountability, access to information, participation and local ownership are key to the achievement of local development. Policies of international financing institutions such as the African and Asian Development Banks have a strong focus on improving participation of the people. While there is strong emphasis on local participation and accountability, many international financing institutions do not put enough weight on promoting real participation and linking it to the downward accountability. Within a project context, for example, participation could be restricted to consultation and under-capacitated governments could be seen as the drivers of 'improving their own accountability', without real participation.

In 2009, Practical Action carried out a desk study to examine published policies and practices of two large international financing institutions, the African Development Bank (AfDB) and the Asian Development Bank (ADB). Both support large programmes on basic services with a total value of US \$ 8 billion per annum and both the organisations prioritised participation of civil society and good governance in their programmes. Two key findings from our study are given below:

- 1) Citizens participation in decisions about water and sanitation services is recognised as an important component by the AfDB and ADB, however, quality of delivery, monitoring and building accountability systems on the basis of this is not evidenced in their policy implementation. There is a strong reliance on national governments to ensure this. Their development partners, such as national governments, may see this as just a "tick in a box"

² EC Issue Paper, Towards an EU Approach to Democratic Local Governance, decentralisation and territorial development

exercise to show support for democracy and inclusiveness. Neither of these global organisations seem to promote participation in accountability. Information available from ADB suggests that they encourage creating a space for participation, but they do not see its actual realisation as their responsibility. This responsibility is frequently transferred to national governments with weak capacity and poor commitment. Moreover, previous badly implemented participation initiatives, lack of representation or illegitimate representation are some of the key barriers to maintain participation approaches on rhetoric and just by-pass it in practice.

- 2) AfDB and ADB deliver their programmes through projects, which are often delivered in partnership with a national or local government institution. If citizens or civil society groups need details about the projects, the information is not easily available. Available formats are technical and official attitudes do not encourage citizens to demand details to participate. However, clear information is often demanded by those who are affected by projects. The desire of citizens to understand and participate is thus constrained. To inform interested citizens and media about the projects and to make available information there is a need for civil society or professional organisations to take action.

It was also concluded that there is apparently insufficient evidence available to convince these financial institutions that participation, by providing information, creating space and encouraging relevant groups to participate, tangibly improves accountability. The real issue is in practice in which participation can be seen as 'additional work' and governments do not see the value of putting additional efforts into it.

Practice to Policy Learning through Networking

Recognising the importance of sharing lessons between practice, raising questions for research and based on this to inform the international policies, Practical Action leads a network called Governance in Practice (GiP) Network of NGOs, academia and practitioners in the UK to regularly share their learning. A number of NGOs bring learning from their programmes, presence of academia help in putting those issues as research problems and the group members combine to participate in policy consultations and to prepare regular policy briefings. Although the group is one of the recognised group of British NGOs in Development (BOND), we keep the sharing of lessons process extremely simple and informal. The network members meet 4 times a year. The networks are now in their third year and the level of participation and number of participants is increasing.

CONCLUSIONS

This paper has examined the question: Can we improve accountability through participation? This was examined at different levels, starting from participatory planning with the poor people, strengthening of community organisations, at the level of municipal governments, in a large scale national programme and in global financing institutions. The paper identifies potential areas, where participation strengthens accountability and also the gaps where it does not or where evidence and experience are insufficient. Participatory actions with the community groups, such as participatory planning and strengthening of CBOs are tangible and effective entry points for an accountability relationship. These are some excellent triggers to initiate such a relationship. This was reflected in allocation of official municipal resources through a participatory process and opening up space for community groups in decision making in Bangladesh and Kenya. While the immediate findings are exciting, we would like to know more about the sustainability and growth of such good practices. Thus far our evidence suggests that good collective organisation and a committed municipal leadership are the two most important factors for realising and sustaining this accountability. When we analysed the key question at the level of municipal working and national programmes, it was very evident that despite an institutional commitment at the national level, the local capacity and understanding of the leadership culture are equally important. We looked at the level of international financing institutions because of the leverage they could bring to influence policies, institutions and practices. The commitment of these institutions in promoting participation and linking it to the accountability is not equivalent to the potential influence they could bring. This is evident from the fact that all these processes are handed over to the national government organisations, with limited capacity. Finally our experience sharing with other NGOs brought out points about state-society relationship, the need for patience, importance of local elites, role of the media and the differences in the local context. Overall we could conclude that improved participation and its impact on accountability needs to be analysed as a system where actors at different levels play their role and interact with each other. This is much more than a demand and supply relationship, which is predictable and measurable. Participation at any of these levels and its impact on accountability depends on the ability of the facilitating organisation to influence all the levels with commitment and right details with the ability to stand there.

The overall learning from the paper is summarised in the Table below;

Level	Potential of Participation	Lessons on Participation to Accountability
Neighbourhood	Through participatory planning and strengthening of community based organisations	Both the methods initiate engagement with the local authorities and with the right leadership it helps in developing accountability relationship
City/ Town	Considering existing systems in the municipal authorities and strengthen local representation on them, further building from the neighbourhood systems	Changes in the systems of allocation of resources is a key indicator of changing relationship, sustaining those good practices is challenging.
National	By using opportunities created in some national policies and programmes	Developing more details on the delivery of such policies and a need to make local institutions more accountable in line with the policies
International	Consultation processes and policy engagement with the international financing institutions because of their potential to leverage a change	Often the delivery mechanisms of such policies are weak, with missing links between policies and practices

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CONTACT DETAILS

Practical Action

Bourton on Dunsmore

Rugby, Warwickshire

CV23 9QZ, UK

Mansoor Ali

mansali@practicalaction.org.uk