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REPUBLIC OF ZIMBABWE NATIONAL WATER POLICY: A DESK REVIEW OF THE GAPS BETWEEN THE POLICY AND ITS IMPLEMENTATION

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ABSTRACT

The researchers set out to identify the gaps between the Republic of Zimbabwe National Water Policy and its implementation. A qualitatively-oriented desk review provided the step-by-step process of identifying and analysing the gaps. The desk review was informed by the observation that no scholar has engaged the Water Policy and the performance of the water sector in terms of gaps between policy and implementation. The existing literature focuses on, and is influenced by quantitative and linear analyses. A lacuna therefore exists in Zimbabwean literature on qualitative policy analysis. The desk review was aimed at creating a platform for conducting a qualitative empirical study on the policy and its performance in urban areas. The desk review produced three major findings. Firstly, that the aim, objectives and principles of the policy are stated in qualitative terms. Secondly, that the gaps between the policy and its implementation are largely qualitative. Thirdly, that the available analyses of the water sector have been influenced solely by technical and linear models. Accordingly, two main recommendations are proffered. Solid empirical qualitative analyses of the gaps between the policy and implementation should be done against the provisions of the policy. Interactive models of policy analyses should be used as substitutes to, or in conjunction with linear models. The aim of such studies should be to attain the overall goal of social policy, that is, creating and sustaining wellbeing.

Keywords: Policy, Implementation, Analysis, Network, Model.

Contribution/ Originality

This is an original and unique article on the qualitative gaps between Zimbabwe's National Water Policy and its implementation as social policy issues. The study contributes to the limited empirical knowledge and literature on effective policy implementation.

1. INTRODUCTION

The National Water Policy is among the key social policies that anchor the socioeconomic development of a country. According to the Republic of Zimbabwe (1998) and Republic of Zimbabwe (2013), potable water is a major resource for human development and is an essential human right for all citizens. However, most countries seem to be failing to manage water poverty and its effects on wellbeing. Both the domestic and commercial water consumers cannot function without effective potable water supply. Water cross-cuts all development goals therefore, the achievement of the Republic of Zimbabwe Development Targets, the Millennium Development Goals (MDGs) and other development goals to be set in future is impossible without water. Zimbabwe is not an exception in terms of severe potable water shortages in the domestic and industrial settings, and in terms of endeavours to reduce potable water poverty in both the rural and urban areas. This has led to increasing emphasis on policy analysis in the water sector as a platform for the formulation and implementation of effective water development and management policies. Ideally, the Zimbabwe National Water Policy should be an effective instrument in securing wellbeing for all Zimbabweans. This paper is a product of a desk review of the Republic of Zimbabwe National Water Policy and the publications by key Zimbabwean scholars on water issues in Zimbabwe.

1.1. The Research Problem

Formal policy statements and principles in the Republic of Zimbabwe National Water Act and the Republic of Zimbabwe National Water Policy such as efficient water supply, quality potable water, rights-based access, equity, sustainability and empowerment seem to be incongruent with the 'realities' of water supply. The ever-increasing and extensive severe potable water shortages are rampant especially in the urban areas despite the general statement that the policy is technically-sound. In the context of such incongruence, no empirical analyses have been conducted to explore, discover and interpret the gaps between the National Water Policy and its implementation from a qualitative perspective. Those who studied the Zimbabwean water sector restricted their studies to the quantifiable gaps and technical problems. This desk review aims to identify the implementation gaps in the policy from a qualitative perspective as a way of addressing this lacuna. This gap analysis is intended to create a basis for conducting a practicebased study upon which the policy can be analysed, and evidence-based recommendations for improvement can be proffered.

1.2. Rationale for the Study

The rationale for the study is to conduct a qualitative desk review of the Republic of Zimbabwe National Water Policy and selected publications by Zimbabwean scholars on water management in Zimbabwe. The desk review opens opportunities for exploring, discovering, interpreting and recommending ways of improving the performance of the policy and the water sector. The social policy implications of the findings of the study will be considered by engaging

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the beneficiaries of the NWP, other researchers and a range of stakeholders in the public, private and Non-Governmental sectors.

1.3. Objectives

The objectives of the desk review are to:

- identify the causes of potable water shortages in Zimbabwe as explained in literature
- identify the policy model that guides the Zimbabwe's National Water Policy
- qualitatively interpret the match or mismatch between the formal statements in Zimbabwe's National Water Policy and its implementation
- recommend a qualitative field-based study on analysing the implementation of the Zimbabwe's National Water Policy

1.4. Research Questions

The research questions that will guide the proposed study are:

- What are the causes of the critical potable water shortages according to existing literature?
- Which policy model is guiding Zimbabwe's National Water Policy?
- In what ways and to what extent is Zimbabwe's National Water Policy and its implementation matching or not matching?
- How can social policy analysis be conducted in the water sector to complement or substitute technically-based analyses?

1.5. Assumptions

The desk review is based on the following assumptions:

- The wider vision of social policy analysis is missing in Zimbabwe's water sector.
- Policy processes are based on a network of actors.
- The qualitative gaps between Zimbabwe's National Water Policy and its implementation have not been systematically identified and studied.
- The gaps between Zimbabwe's National Water Policy and its implementation can be reformed (if there is need), in line with the findings of an empirical study.

2. REVIEW OF RELATED LITERATURE

The related literature reviewed is presented in thematic form. Despite the thematic divisions, the literature reviewed was chosen for its conceptual, theoretical, methodological and empirical relevance to the desk review.

2.1. The Republic of Zimbabwe National Water Policy: A Brief Overview

The Zimbabwe National Water Policy came into force in 2013 after baseline work by the Ministry of Water Resources Development and Management (MWRDM), World Bank (WB) and United Nations Children's Fund (UNICEF). The WB and UNICEF provided technical expertise to the government of Zimbabwe through the MWRDM in two phases. Phase 1 included the production of a Water Sector Technical Background Paper. Phase 2 was about provision of support for the development of the policy. The first phase led to the production and integration of three documents. These are Water Resources Development and Management; Urban Water Supply and Sanitation; and Rural Water Supply and Sanitation (World Bank, 2012).

The overall aim of the Republic of Zimbabwe National Water Policy is to improve the security and availability of water to all the multi-purpose users. Its objectives are based on harnessing, conserving, protecting and managing water for multi-purpose use. Both the demand and supply sides are considered to be vital. In principle, water is considered as a social and economic resource that should be of high quality, universally accessible and affordable. The intended beneficiaries are all the domestic and industrial water consumers in Zimbabwe. The key stakeholders are the public, private, NGO and donor sectors.

2.2. Water Issues in Zimbabwe: Views from Zimbabwean Scholars

Water is an essential resource for socioeconomic development in Zimbabwe. However, water development and supply is lagging behind water demand for domestic and industrial use (Musingafi, 2013). Critical water shortages are more pronounced in urban areas of Zimbabwe, and are being experienced in a context of increasing water consumption needs. Several authors have focused their works on the performance of the Zimbabwe water sector and all of them concur on three major aspects; the necessity of water for any form of human development, severity of water shortages and deteriorating water quality especially in all the urban areas, and the need to ensure adequate and quality water supply to the intended consumers. The core literature on water supply in Zimbabwe explains some of the contributing factors to water supply problems in Zimbabwe's urban areas. These include obsolete infrastructure, increase in population, rapid urbanisation and low storage capacity of water sources. Moreover, the authors point to a paradox in Zimbabwe's water woes; the shortages appear to be experienced even when surface and underground water is vast and when mean rainfall is high. A contradiction emerges in that the National Water Policy provides that both the surface and underground water sources will be utilised to meet commercial and domestic water needs fully.

Among the core scholars on water in Zimbabwe are Nhapi (2009) whose focus is on governance issues; Musingafi (2013) who focuses on Integrated Water Resource Management (IWRM) and Makwara and Tavuyanago (2012) who focus on water shortages and water borne diseases. These scholars converge on the view that despite the proliferation of national legislations on water development and management, and calls for Zimbabwe to adhere to the MDGs water targets, Zimbabwe's potable water woes are determined more by implementation problems than other factors.

The publications of all these scholars are important because they address some of the issues in water demand and supply in Zimbabwe. However, all their studies did not specifically focus on the qualitative gaps between the National Water Policy and its implementation. They also lack a transformative conceptual framework. In cases where the scholars did some analysis, they restricted themselves to technical aspects of the water sector. The literature either does not analyse the water supply problems in relation to the policy or just points to the need for effective water policy without in-depth analysis of the same in relation to the water problems. No authority has ever done policy analysis to analyse the match or mismatch between the policy and its implementation.

The emphasis by the authors that water is a necessity and that water shortages should be proactively addressed are valid because in no society can human existence and development be achieved and sustained without water. The need for achieving adequate access to quality water has been, and continues to be emphasised not only by these Zimbabwean scholars but also at international level, particularly through the operations of the United Nations (UN), NGOs and bilateral relations. This emphasis can be noted in the United Nations conferences and platforms for action for potable water. According to Musingafi (2013), these include the United Nations Water Conference (1977), International Water Supply and Sanitation Decade (1981-1990) and International Conference in Water and the Environment (1992). Moreover, the UN General Assembly declared 2003 an International Year of Freshwater. In the same year, the Chief Executive Board which is the UN coordination body for water established an inter-agency coordination mechanism for all freshwater and sanitation related issues called the UN Water. Furthermore, the 2005 to 2015 period was proclaimed an International Decade for Action by the General Assembly to further strengthen global action to meet the freshwater and sanitationrelated targets (Musingafi, 2013). All these efforts indicate the importance of water in human development.

A recurring theme that can be identified in Zimbabwean literature (and literature in other countries) is that of water as a human right. A high level attempt to introduce human rights on water issues is the UN General Assembly's 2010 recognition of the human right to water and sanitation. The desirable situation is whereby every human being has access to sufficient (fifty to hundred litres per day), safe, affordable and physically accessible water for personal and domestic uses everyday.

Other than explaining that Zimbabwe's urban areas are experiencing severe potable water shortages in a context where water appears to be abundant, Makwara and Tavuyanago (2012), did not question the link between potable water supply problems and the capacity of the Republic of Zimbabwe National Water Policy to address these problems. They did not critique the existence of potable water poverty against the Water Policy in a context where water is generally 'plenty'. It is inadequate to explain water supply problems without ultimately analysing these in relation to the capacity and effectiveness of the National Water policy or ZINWA and Council programmes. Focusing on governance, as was done by Nhapi (2009), is important because the water sector and its technical aspects are also influenced by the type and quality of governance. However, the explanations of the causes of water supply problems solely in technical terms; and suggesting recommendations that can not be operationalised are of limited utility in policy analysis and reform. IWRM has been presented in most literature as the 'in paradigm' for reducing or eliminating water problems in contemporary societies. One can note that Musingafi (2013) work has the same orientation. However, stating IWRM principles is easy but turning the principles into action may be difficult. Drafting new water laws on the basis of IWRM may be easy but translating them into practice is not, leading to gaps between policy statements and the practical side. The benefits of IWRM in Zimbabwe will be null without implementation. A recurring theme literature on water is the mismatch between Zimbabwe's water legislations and implementation (practice). However, merely showing the policy audience that water supply problems exist in Zimbabwe and that their resolution lies in the implementation of legislative reforms is of limited utility. A sound analysis should identify the gaps, their sources and forms, and provide practical strategies of reducing or eliminating the gaps.

The preceding literature by Zimbabwean academics did not indicate the need for increasing efficient use of water resources and reforming water sectors, and did not specifically spell out policy gaps, especially the qualitative ones. In addition, the linear model is not critiqued in their literature. However, the Zimbabwean literature sets a background upon which further analysis can be done.

2.3. Issues in Policy Implementation beyond Zimbabwe

Literature on water supply and other areas of social policy spans beyond Zimbabwe. Among the authorities whose works are vital for understanding policy and implementation are Pretorius (2003), Hagg and Emmet (2003), Van Wyk (2001), Burger (2001), Louw (2003), Pottie (2003), Meissner (2005), Booysen (2009), Bauer (2009), Brynard (2010), Phago (2010), Katoma (2011), Malan (2005), Masango (2004), Manzungu *et al.* (2012). It can be derived from the works of these authorities that what is stated in policy documents may not always be realised in practice, and that the reasons for the disjunctions depend on the context. Moreover, one can also note that implementation is affected directly or indirectly by political, economic and social factors. The importance of focusing on both micro and macro spheres of policy making in policy analysis is also brought by to the attention of policy analysts. However, is also important to understand since policy making and implementation interact, some gaps are created in the policy making stage and spill over to implementation.

Formal policy principles and statements may not be realised in practice. For example, Hagg and Emmet (2003) indicate that South Africa's community water supply programme by the Department of Water Affairs and Forestry (DWAF) was expressed in terms of equity, sustainability and institutional gaps. Despite the success of this programme in some urban areas, water supply was not equitable for all groups. For example, rural people in South Africa could not benefit from block tariffs because metering is only possible in urban areas. This gap contradicts the equity principle in the water policy.

The view that policy statements may not always match with the implementation side can also be identified in many other authors. For example, Louw (2003) focused on this disjunction in terms of the South African government's emphasis on community participation and sustainability on housing and water supply. Despite such formal statements, in practice the South African government bypassed community structures and emphasised rapid delivery at the expense of sustainability. Pottie (2003), Phago (2010); Magoro and Brynard (2010) seem to confirm these findings by Louw (2003). These authors concur on the view that despite the stated desire in South African housing policy to provide low cost housing to the poor, government practice is profit driven. These arguments point to a gap between policy statements and implementation of the policy. However, it is also important to understand that some gaps could have emerged in the policy making stage.

Diversity in factors that policy analysts can focus on is an important consideration in analysing policies. From the works of Van Wyk (2001), analysts are drawn to the importance of focusing on legislation, control, services, taxes and incentives among other factors when analysing formal policy statements and practice in the short and long term periods. For example, control is important in attempts to translate policies to practice. Without control gaps between policy and its implementation will emerge. One can also note that such diversity enriches and complicates policy analysis simultaneously.

Policy analysis in contemporary societies appears to focus on public participation (among other factors) because of the view that public participation links the public to policy makers/implementers. The influence of the Interactive model (which the researcher views as more appropriate) can be noted in Masango (2004) emphasis on public participation and its link to quality policy making/implementation. However, it is important to understand that plurality of actors in cooperative governance may lead to challenges such as conflicting interests and ideologies. The need to understand and manage these challenges is also emphasised by Meissner (2005), Malan (2005), Booysen (2009) and Bauer (2009).

3. METHODOLOGY

The components of the methodology applied by the researchers are explained below.

3.1. The Design of the Desk Review

Several authors have focused their works on research designs. Among these are Creswell (2003), Creswel and Plano-Clark (2007), Flick (2006), Maxwell (2005), Punch (2005), Berg (2007), Denzin and Lincoln (2005). Qualitative, quantitative and mixed methods are the key types of research designs. Despite this variety, the choice of research design is determined by the nature of the problem, the purpose of the study and the chosen theoretical perspective. The desk review was guided by the provisions of the qualitative design. This design was the most appropriate because the purpose of the desk review was to identify the qualitative gaps in the implementation of the water policy.

3.1.1. Sampling of the Documents

The researchers sampled documentary and secondary sources purposively. This sampling technique is justified on the basis that the key sources of information for desk review were already known and the overall focus was on the qualitative components of policy implementation.

3.2. Type of Data and Data Sources

A desk review of qualitative policy implementation gaps calls for the collection of qualitative data. These could be secondary and documentary. The types of data that were gathered in the desk review and their sources are explained below.

3.2.1. Qualitative Data

The sub-categories of qualitative data and their sources are explained below.

(i) Documentary Sources

The Republic of Zimbabwe National Water Policy was the main document reviewed. However, the Republic of Zimbabwe Water Act was reviewed in addition to the policy. These documents have been chosen because of their direct link to the research problem. Documentary data sources are readily available, easily accessible and non-reactive. The researchers were aware of the view that the people who prepared the documents may have un/intentionally introduced biases in the documents. However, the researchers also used secondary data sources to complement documentary sources.

(ii) Secondary Sources

Relevant publications on Water policy, other public policies and policy implementation by seasoned academics such as Pretorius (2003) and reputable organisations such as the UN will be analysed in relation to the objectives of the study prior to the analysis of first hand data. Focus will be on qualitative information and data due to the qualitative orientation of the research problem. Secondary sources of data on public policy and policy implementation are already existing therefore are easier and cheaper to access. However, the likely problem is that secondary data may not have been collected for the specific purpose that the researcher is interested in. Moreover, the researcher may not always be able to detect or control biases in secondary data. Integration of the three types of data in same study may help the researcher to cross- checking against other data sources.

4. RESULTS OF THE DESK REVIEW

The desk review of the Zimbabwe National Water Policy and the situation of water quality and supply are marked by one theme, that is, gaps between what is stated or desired in the policy and what is occurring in practice. As earlier on indicated in the statement of the problem, the focus of the desk review is to identify qualitative gaps in policy analysis. The identification and analysis of such gaps will be done in relation to the key contributors to the field of policy analysis. These are Brinkerhoff and Crosby (2002) and Pretorius (2003).

The key qualitative gaps between the Zimbabwe National Water Policy and its implementation that were identified in the desk review are: non-existence of qualitative analysis of policy and implementation gaps; conceptual and ideological contestations; policy design and wide support; linear-interactive model contestations; predicted consequences; specification of beneficiaries, quality and empowerment issues; public participation; quality policy decisions; improved implementation feasibility; need-driven policy reforms; effective organisational and human resources. All these aspects of the policy are largely qualitative.

The gaps between Zimbabwe's National Water Policy and its implementation are largely qualitative. For example, the Zimbabwean Water policy contains statements such as beneficiary, policy, policy gaps, in/equity, in/equality, empowerment and rights. These are largely qualitative than they are quantitative. Moreover, the policy's objectives and principles are stated in qualitative terms. Policy analysts should therefore not merely restrict their analyses to the quantitative factors. The Zimbabwean literature reviewed show that attention has always been on quantitative and technical issues in the water sector. One can learn from Pretorius (2003) that the gaps between a policy and its implementation are predominantly qualitative, and that the specific components of policy (those that can be quantified) may lead policy analysts to focus on quantitative aspects when conducting implementation analysis.

The gaps between the Zimbabwe Water Policy and its implementation are complex because of the involvement of multiple actors. In addition, there are conceptual and ideological contestations among the various actors involved in the implementation process. Conceptual and ideological aspects of policy implementation are unquantifiable yet they are essential in successful policy implementation. For example, the actors that are central to the implementation of the Zimbabwean Water Policy include the Government of Zimbabwe, Ministry of Local Government, Rural and Urban Development, the Zimbabwe National Water Authority, private organisations, NGOs and donors. The World Bank (WB) and the United Nations Children's Fund (UNICEF) were the key actors in the provision of technical expertise and funding when the policy was formulated. The public sector actors are guided by a socialist and expansionist ideology. The views and actions of the private sector actors are influenced by the profit motive while the WB, NGOs and donors are influenced by the neoliberal ideology and agenda. Conflicting concepts and ideologies seriously hamper any successful policy formulation and implementation. These qualitative components are missing in Zimbabwean policy literature because of the over-arching concern on quantifiable aspects of policy analysis.

In support of the above findings, analysis by Pretorius (2003) indicates that the identification and analysis of the gaps between policy and its implementation are not always this simple because of the involvement of many factors that defy simplistic explanations and overgeneralisations. Among these complex factors are quantitative and qualitative, conceptual, ideological and methodological contestations. For example, one is likely to find many definitions of the term policy gap because what a term means depends on one's orientation. These views were confirmed the findings of the desk review.

Zimbabwe's Water Policy is technically well designed. In addition, the policy is also widely supported. However, policy design and wide support are of limited relevance if the implementation function is weak. The implementation part is weak as shown by the water development, water quality and water supply problems. Policy design is a fusion of both quantifiable and unquantifiable components of a policy and its achievement. For instance, water quality is a qualitative aspect, and its attainment should be clearly spelt out in Zimbabwe's Water Policy. This qualitative term is stated in the Water Policy but there are no integrated mechanisms for its attainment.

Countries may be known for formulating technically sound policies, but the implementation side may be weak. This observation is supported by several authorities from other countries. Brinkerhoff and Crosby (2002) and Pretorius (2003) converge on the view that how well a policy is designed and supported by the majority may not influence the capacity of the policy to achieve the intended objectives. One can argue that policies that are 'good' on paper yet whose soundness is not realised in practice indicate implementation gaps thereby signalling policy failure. It follows therefore that nothing will be gained from policies that are not implemented or those policies whose implementation gaps are not known and addressed.

The predicted consequences, specification of beneficiaries, quality and empowerment issues are important qualitative aspects upon which the gaps between the policy and its implementation can be analysed. The Zimbabwe's Water Policy clearly indicates the target group/beneficiaries as all the residents of Zimbabwe. However, there is an expectation of cost recovery by ZINWA as the responsible authority. Unintended beneficiaries are emerging or may end up benefiting more than the target group. Moreover, the already better off groups may benefit at the expense of the worse off groups in society. For example, the farmers who are illegally exploiting surface and ground water for irrigation purposes can be classified as unintended beneficiaries because they are not paying. The same applies to unsanctioned boreholes being drilled in urban areas. In addition, high ranked political giants may not meet water bills yet they continue to have unlimited access to water.

The basis upon which beneficiaries are identified and how their needs are incorporated in policy making, and how satisfaction of their needs is ensured determines the effectiveness of a policy. For instance, the majority of the rate payers in urban areas are getting erratic water supply. Their water needs are not being met. Through this understanding, the analyst's attention is also drawn to the fact that policies should be analysed not only on the basis of predicted consequences but also how the policy spells out beneficiaries and tackles quality and empowerment issues. For example, the Water Policy of Zimbabwe cannot be said to be empowering the majority of the urban dwellers because the policy is not protecting their wellbeing.

The specification of beneficiaries should go beyond quantifying them. It can be understood on the basis of this argument that policy analysis that does not focus on beneficiaries and their differential situations is sub-standard. One can also learn from such in-depth analyses that the quality of water provided through the policy, how well the policy reduces inequalities and the extent to which the beneficiaries are empowered should also be considered in policy analysis. Water quality, inequalities, empowerment and differential situations of the beneficiaries are predominantly qualitative components therefore mismatches between these policy principles and its implementation can best be understood as qualitative gaps.

Public participation is a key qualitative factor in policy formation and implementation. In similar attempts to understand gaps between policy and implementation, one can understand that the failure to cater for public participation in public policies is in itself a policy gap. The current literature on the Zimbabwean water sector performance is devoid of situated meanings and experiences from the grassroots. Public views on social policies tend to be urban-biased. These are lacunae that social policy scholars should address. Accordingly, despite the problems presented by public participation, the citizens of any country loose confidence in a government that cannot translate policy statements to action.

In response to the policy, there is no literature on the implementation implications of quality policy decisions, improved implementation feasibility, need-driven policy reforms; effective organisational, human and financial resources. Basing on this explanation one can also argue that analysts should also focus on the appropriateness of these factors to the policy context. These arguments are supported by many authors. Among the key ones are Brinkerhoff and Crosby (2002).

The interactive relationship between policy formulation and its implementation is missing in the dominant literature on the water sector in Zimbabwe. No scholar has merged the formulation and implementation of the Zimbabwean Water Policy in an analysis of the gaps between the policy and its implementation. Much of what was written by Nhapi (2009); Musingafi (2013) and Makwara and Tavuyanago (2012) is on the implementation side of the Water Policy. However, the desk review draws policy analysts from the general understanding of policy gaps being a characteristic of implementation to a situation where policy analysts should find, and deal with gaps originating or existing from policy making to implementation. This broader and deeper analysis is missing in much literature, as exemplified by Zimbabwean literature. The application of such analyses yields sharp understanding of the gaps between the Zimbabwean Water Policy and its implementation.

The desk review also indicates that Zimbabwean scholars and policy analysts tend to rely more on technical and linear model analyses of the Water policy and the other social policies, while disregarding the interactive model. The two models have strengths and weaknesses. Linear analysis is restricted to institutional causes of the gaps while interactive analysis emphasise the gap-producing character of plural, complex and shifting policy processes (Yanov, 2000); (Brinkerhoff and Crosby, 2002). Interactive analysis has the advantage of facilitating better improvement of policy through the consideration of the various factors that influence policy and its implementation.

5. RECOMMENDATIONS

The desk review leads to the following recommendations:

- Both qualitative and quantitative analyses of the gaps between policy and its implementation should be done. Reliance on one type leads to narrow analysis and inadequate advice on bridging the gaps between policy and its implementation.
- Analysis of policies should be done using interactive models as a substitute to or in addition to linear models depending on the research problem.
- There is need to conduct a solid empirical study that is informed by an Interactive model on the effectiveness of the Water Policy of Zimbabwe. Specific empirical evidence on how to reduce and/or eliminate the gaps between the policy and its implementation is essential in maximising the effectiveness of the policy.

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