

**THE HASHEMITE KINGDOM OF JORDAN**

**Modernizing Education, Skills, and Administrative  
Reforms “MASAR”**

**PROPOSED PROGRAM FOR RESULTS**

(P180508)

**ENVIRONMENTAL AND SOCIAL SYSTEMS ASSESSMENT  
(ESSA)**

**REPORT**

**April 2024**

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## ACRONYMS

- ASEZ: Aqaba Special Economic Zone
- ASEZA: Aqaba Special Economic Zone Authority
- CGD: Complaints and Grievances Division
- CSOs: Civil Society Organizations
- DCU: Development Coordination Unit
- DLI: Development Objective Indicator
- DLS: Department of Land Survey
- E&S: Environmental and Social
- ECCD: Early Childhood Care and Development
- ECE: Early Childhood Education
- ECED: Early Childhood Education and Development
- EHS: Environmental, Health, and Safety
- EIA: Environmental Impact Assessment
- EMP: Environmental Management Plan
- ESE: Strategic Plan for Education
- ESIA: Environmental and Social Impact Assessment
- ESMP: Enhanced School Management Program
- ESMS: Environmental and Social Management Systems
- ESP: Educational Sector Plan
- ESSA: Environmental and Social Systems Assessment
- FGD: Focus Group Discussion
- GBD: Government Buildings Department
- GBV: Gender-Based Violence
- GEAP: Gender Equality Action Plan
- GED: Gender and Strategic Partnerships Department
- GIS: Geographic Information Systems
- GIZ: German Corporation for International Cooperation GmbH
- GRM: Grievance Redress Mechanism
- GTD: Government Tenders Department
- HUDC: Housing and Urban Development Corporation
- IFC: International Finance Corporation
- ILO: International Labor Organization
- IRC: International Relief Committee
- JDC: Job Description Cards
- JNTC: Jordan National Training Council
- KG: Kindergarten
- KG2: Kindergarten 2
- LA: Land Acquisition
- LMS: Learning Management System
- MOPWH: Ministry of Public Works and Housing
- MPWH: Ministry of Public Works and Housing
- MoD: Ministry of Development
- MoE: Ministry of Education
- MoEnv: Ministry of Environment
- MoH: Ministry of Health
- MoL: Ministry of Labor
- MoPIC: Ministry of Planning and International Cooperation
- MoSD: Ministry of Social Development
- NCCL: National Committee for Child Labor
- NCD: National Curriculum Directorate

- NCSCM: National Center for Security and Crisis Management
- NFCCL: National Framework for Combating Child Labor
- NRC: Norwegian Refugee Council
- NRIP: National Registry for Investment Project
- OHS: Occupational Health and Safety
- OP/BP: Operational Policy/Bank Procedure
- OP/BP 9.00: Operational Policy/Bank Procedure 9.00
- OPS: Operational Policy
- Open EMIS: Open Education Management Information System
- P4R: Program-for-Results
- PAP: Program Action Plan
- PAPs: Project Affected Peoples
- PAs: Protected Areas
- PMU: Program Management Unit
- PPP: Public-Private Partnerships
- PWDs: Persons With Disabilities
- PforR: Program for Results
- QAS: Quality Assurance System
- QRC: Queen Rania Center
- RA: Result Area
- RAs: Result Areas
- REL: Real Estate Law
- RSCN: Royal Society for the Conservation of Nature
- RoW: Right of Way
- SBD: Standard Bidding Documents
- SBDs: Standard Bidding Documents
- SCAs: Special Conservation Areas
- SDF: Skills Development Fund
- SDG: Sustainable Development Goal
- SDRGBV: School-related Gender-based Violence
- SEA/SH: Sexual Exploitation, Abuse/Harassment
- SEZA: Aqaba Special Economic Zone Authority
- SG: Secretary-General
- SH: Sexual Harassment
- SIOP: School Infrastructure Operational Plan
- SOP: Standard Operating Procedure
- SOPs: Standard Operating Procedures
- SPAC: Service and Public Administration Commission
- SRM: Social Risk Management
- SSC: Social Security Corporation
- SoPs: Standard Operating Procedures
- TVET: Technical and Vocational Education and Training
- TVSCD: Technical and Vocational Skills Development Commission
- ToT: Training of Trainers
- UNESCO: United Nations Educational, Scientific and Cultural Organization
- UNHCR: United Nations High Commissioner for Refugees
- UNICEF: United Nations Children's Fund
- UNRWA: United Nations Relief and Works Agency
- VEPD: Vocational Education and Production Directorate
- VT: Vocational Training
- VTC: Vocational Training Corporation

## Executive Summary

**The Environmental and Social Systems Assessment (ESSA)** for Jordan's proposed Program for Results (PforR) aligns with the Operational Policy (OPS5.04-POL.107 of 2017) and Directive (OPS5.04-DIR.107 of 2022), aiming to amplify potential environmental and social (E&S) benefits while minimizing risks and impacts. The ESSA evaluates potential direct, indirect, induced, and cumulative E&S effects and assesses the borrower's capacity to manage these effects, adhering to the core principles of the World Bank's policy for PforR.

**The MASAR Program encapsulates a strategic effort across three pivotal domains:** enhancing early learning and foundational skills by broadening access to early childhood education and reinforcing literacy and numeracy in early grades; advancing the access and relevance of Technical and Vocational Education and Training (TVET) to align with labor market demands, while facilitating employment transitions and emphasizing private sector engagement and inclusivity for gender-specific and refugee challenges; and improving the governance and management within the education sector to implement new governance structures, strengthen support services for learners, and leverage technology for blended learning. This comprehensive approach aims to modernize education from early childhood to employment, ensuring relevance, inclusivity, and efficient governance to meet the future skills requirements and contribute to economic growth and improved quality of life.

**The Ministry of Education (MOE) will oversee the program's execution,** supported administratively and coordinatively by the Development Coordination Unit (DCU). Various Directorates will spearhead the execution of component-specific activities. This arrangement includes the Directorate of Early Childhood and Education Management Directorate for RA 1, the Directorate of Vocational Education along with the VTC and TVSDC for RA2, and the Managing Directorate of Human Resources, Directorate of Budget, and Queen Rania Center (QRC) for RA3, among other pertinent MOE divisions as necessary. The Program Operation's Manual (POM) will undergo updates to specify the focal points for each Development Objective Indicator (DLI) within the MOE, VTC, and TVSDC.

**Stakeholders' Mapping and Consultations.** In March and April 2024, as part of the Environmental and Social Systems Assessment (ESSA) preparation, the ESSA team conducted a thorough stakeholder mapping and consultation process, categorizing government and non-government entities outlined in Annex II. Individual meetings and interviews were held with proposed implementing agencies, guided by customized question guides. These consultations focused on evaluating Environmental and Social (E&S) risks as the project design evolved, as listed in Annex III. Additionally, a Focus Group Discussion (FGD) engaged 19 Civil Society Organizations (CSOs) related to PforR, seeking insights into E&S risks and perceptions of government performance. The outcomes of these consultations significantly informed the

ESSA's risk assessment, ensuring the effective integration of E&S considerations into the project's planning and implementation.

### **Legal and Institutional Framework for the Proposed Program**

**Jordan's education system, inclusive of vocational training, is deeply embedded within the country's constitutional and legislative framework, demonstrating a strong commitment to the educational rights of children.** Through Article 20, the Jordanian Constitution ensures compulsory primary education for all Jordanians at no cost in state-run schools, a principle further supported by the Child Law through Articles 16, 17, 21, 25, and 26. Additionally, the Rights of Persons with Disabilities Law No. (20) of 2017 represents a significant educational advancement for individuals with disabilities, integrating respect, autonomy, and inclusion into national educational policies and practices. The Ministry of Education (MoE), as per Law No. (3) of 1994 and its subsequent amendments, oversees the education spectrum from early childhood to secondary education. The governance of vocational training within Jordan's formal education system falls under the Law of the Technical and Vocational Skills Development Commission, Law No. 9 of 2019, with the Vocational Training Corporation (VTC)'s structure and mandates further delineated in Article 3 of Law No. 11 of 1985.

**Jordan's environmental management is delineated by a legal framework led by the MoEnv, which orchestrates a systematic approach to environmental compliance for projects.** This structured framework is supported by a well-defined process involving the Environmental Licensing Department, a Licensing Committee, and an EIA Committee. Compliance monitoring falls to the Environmental Inspection Department, which applies a risk-based strategy for prioritizing inspections. The Aqaba Special Economic Zone Authority (ASEZA) governs environmental regulation within its designated area. The established framework reflects Jordan's dedication to balancing environmental stewardship with socio-economic progression. Jordan's Ministry of Environment (MoEnv) has streamlined the environmental licensing and EIA processes, supporting a robust regulatory framework for environmental and social impact assessments. The proposed Program's activities, classified as low risk, must comply with environmental conditions and are subject to MoEnv's oversight. Capacity-building efforts and gender sensitivity are being integrated into EIA processes, and a risk-based approach is adopted for inspections to ensure compliance. Despite some capacity constraints, the proposed Program leverages international support to bolster MoEnv's monitoring capabilities and the overall efficacy of environmental management systems.

**The Ministry of Education (MoE) utilizes a dual-tiered Grievance Redress Mechanism (GRM) system:** the national-level "At Your Service" GRM facilitates public feedback via multiple channels. At the same time, entity specific GRMs offer digital and traditional methods for accessible and transparent grievance redress. For the proposed program, the GRM will be established by the MoE and managed through the Donors Coordination Unit (DCU), ensuring streamlined complaints handling. The MoE, Vocational Training Corporation (VTC), and Technical and Vocational Skills Development Commission (TVSDC) will direct all related grievances to the DCU, serving as a unified platform for efficient resolution. The DCU is tasked with consolidating grievances from the public and stakeholders, aided by designated GRM Focal Points within the DCU, VTC, and TVSDC to manage and report on grievances, ensuring systematic redress and accountability.

## E&S Benefits and Risks Assessment

**The environmental risks under the proposed Program are rated ‘Moderate’ given** (1) the scale of planned construction and civil works for the construction, expansion, and rehabilitation/maintenance of KG and VTC education facilities, (2) the scale of physical activities connected to the expansion of vocational training facilities (centres, classrooms, workshops, etc.), and (3) the OHS and community health risks connected to the operation of vocational training workshops. This rating also noted the E&S performance of the “Education Reform Support Program for Results”, particularly regarding construction management, delayed completion of Program Action Plan requirements, delayed preparation and implementation of committed SOPs, and the underdeveloped E&S capacity of the ministry.

**Increased demand for vocational training will require expansion in the number and size of VTC facilities (including workshops) and increased demand for materials and new technologies.** The proposed Program includes construction and civil works for establishing/constructing, modernizing, expanding, rehabilitating and maintaining vocational training facilities (schools’ buildings, training centres and institutes, workshops, and classroom additions) in all governorates in Jordan (Amman, Irbid, Zarqa, Balqa, Jarash, Ajloun, Mafraq, Karak, Tafila, Maan and Aqaba governorates). It also includes the supply, installation and use of furniture, equipment, tools, computers, electrician/electronic devices, and other supplies in several training workshops and schools. Risks connected to the proposed construction, civil works, and supplies, including OHS, public health and safety (including students, teachers and adjacent communities), and waste generation and management.

**These risks are likely due to a possible lack of compliance with the environmental safeguard requirements** governed by the national environmental regulations and sound environmental practices linked to construction and civil works. Risks connected to the operation of the training workshops and facilities, including risks and impacts associated with generating and managing waste (including hazardous waste), OHS, and public health and safety (including students, teachers, and adjacent communities). These risks are likely to occur due to lack of or weak environmentally conscious TVET licensing and provisions, noncompliance with environmental regulations, safeguard standards and good international practices, and the absence of or weak environmental monitoring in vocational training facilities and operations. Impacts and effects of such risks may vary depending on which “priority sectors” will be targeted by the Program complementing organisation, such as lack of environmental policies, regulations, ESMS and resources/capacity to address the environmental risks associated with the proposed program.

**This needs to be properly addressed and managed through maintaining sufficient environment capacity within the Development Coordination Unit (DCU) and within** each of the other implementing agencies (VTC and TVSDC). Regarding expected environmental benefits, the Program forms an opportunity for incorporating environmental, climate change and green economy concepts into vocational training, which can help raise environmental awareness and develop students’ skills connected to environmental priorities (e.g., OHS, green investments and technology, resources efficiency, pollution prevention, etc.). This will improve their employers' capacity in priority sectors to better address relevant environmental risks and impacts and capture opportunities linked to a green

economy, green jobs and cleaner production. This can also positively contribute to vocational training attractiveness to students by offering relevant qualifications and credentials in the labor market on the topics mentioned before and accordingly contribute to achieving DLR 4.2.

**The social risk is rated “Substantial”.** This risk rating is primarily owing to 1) the possible land-related risks under the program that could be associated with the envisaged construction, expansion, and rehabilitation/maintenance of KG and TVET education facilities. It is also important to note that loss of access to natural resources is not anticipated to occur as a result of the proposed Program or any of its activities, 2) the pending land acquisition audit and the preparation of related SOPs that is ongoing under the current P4R, 3) the pending GRM strengthening and upgrading of the existing system, and related SOP that are being developed under the current PforR, 4) additional social concerns such as inadequate systems for managing social risks, which encompass stakeholder engagement, social inclusion, gender-based violence, etc. The experience and performance of the ongoing PforR showed delays in the implementation of several social actions (including land acquisition and GRM strengthening) and generally weak social risk management systems with the ministry.

**The project will yield several social benefits** through expanding educational access which promotes inclusivity and progress, and enhancing early education and foundational skills sets children up for success (RA1). Flexible technical and vocational education and training (TVET) and smoother pathways to higher education align with job markets which is expected under RA2. In addition, updating accreditations and teacher training improves graduate employability, coherent policies and effective guidance foster equity and informed choices, digital tools and quality teaching prepare students for a digital world, and transparent finances ensure fair resource allocation (RA3). However, there are general social risks that could be associated with the project interventions that are mainly concerns risks associated with land acquisition. While the program excludes construction of new schools, RA1 supports expanded enrollment of children in KG2 and increased access to TVET education under RA2. School expansion is primarily executed on existing school lands. Land acquisition is minimized by constructing on existing MOE lands wherever possible, and the MOE also uses other strategies to increasing enrollment (e.g. increase class size), but school expansions in some cases entail swapping of land between ministries, or acquiring adjacent parcels from private land owners on a willing-buyer willing seller basis.

**Furthermore, the interventions lacking proper social impact assessments and community engagement may face resistance and fail to meet needs,** limited stakeholder engagement during planning and execution can also compromise intervention success, and poor monitoring and feedback integration can hinder social risk management. ECE expansion risks include land issues, inadequate child safety, worker risks (health, safety, exploitation), increased social inequality, overlooked gender violence, non-inclusive family support, stigma against catch-up programs, academic overemphasis, and community health risks from exploitation and harassment. Under RA2 TVET program improvements risk widening educational gaps for disadvantaged students, not fully addressing gender, refugee, and disability barriers, reinforcing stereotypes, excluding marginalized learners, overlooking curricula risks, and neglecting safety and harassment issues, leading to potential student dropout. In addition, educational reforms may cause temporary confusion among stakeholders, create unequal access to career guidance, lack resources for effective counselling, widen the digital divide, impose a



generalized approach that disregards local needs, increase data privacy risks, and potentially ignore issues of gender-based violence and sexual harassment within the education system (RA3).

**The MOE has an operational GRM that will be strengthened through the ongoing PforR.** The GRM accepts complaints from the public, teachers and staff, and students. In addition, it receives complaints from the nation-wide GoJ “at your service” application. The ongoing consultancy will measure to strengthen the capacity of MOE GRM Systems, specifically the completion of the upgrading of the existing electronic complaint platform (Insaf) and training for the GRM unit, supported by Technical Assistance.

## I. INTRODUCTION

The proposed “Modernising Education, Skills, and Administrative Reforms” program for results (PforR) is a strategic Program conceptualized within the ambit of the Economic Modernization Vision (EMV), which includes a transformative and ambitious plan for the education sector under the “Smart Jordan” growth pillar, which aims to develop and prepare local talents to meet the needs of future skills, required resources and institutions to accelerate economic growth and enhance quality of life. “Smart Jordan” consists of a comprehensive package of reforms with the potential to transform the education sector, focusing on 6 pillars: (a) Early childhood care and development (ECCD) (including Early childhood and early primary education for children under 9 years old); (b) Basic education (primary and secondary); (c) Higher education; (d) Technical and Vocational Education and Training (TVET); (e) Research and development and innovation; (f) Entrepreneurship; and (g) Data. It includes digitalization, governance and management and legal environment as crosscutting areas to support the reform. The first four pillars of Smart Jordan constitute the Government program. The GOJ launched the Executive Plan for the “Smart Jordan” pillar, a set of strategic reforms to prioritize under the implementation of the EMV. The plan followed extensive national stakeholder consultations with the participation of more than 500 experts from the private and public sectors, Parliament, academia, civil society, media, development partners and civil society all central to the success in the implementation of the reforms.

The ESSA has been prepared in accordance with the World Bank Policy for Program for Results. The ESSA is required to comply with the Bank Policy for Program for Results Financing, which includes a set of six core environmental and social principles. These principles encompass sustainability and risk avoidance, adverse impact mitigation, public and worker safety, land acquisition and loss of access to natural resources management, social inclusion, and conflict avoidance.

This ESSA should be read in conjunction with the proposed Program Appraisal Document (PAD) to provide full details of the proposed Program Design.

A legal and regulatory analysis has been conducted to assess the legal, regulatory, and institutional frameworks applicable to the proposed PforR, ensuring it aligns with sustainable goals, minimizes adverse impacts, and complies with financing criteria. The E&S system also safeguards public and worker safety, manages land acquisition to limit displacement, and emphasizes equitable access and cultural appropriateness, all while mitigating social conflicts in sensitive areas.

Through a comprehensive examination of the potential E&S effects of the Program, including direct, indirect, induced, and cumulative effects; the borrower's legal framework, regulatory authority, organizational capacity, and performance; and the probability of achieving its E&S objectives, this report sets the framework for the proposed Program for a model that aligns with the core principles and planning elements stipulated by the World Bank.

## 1.1 Purpose of the ESSA

The World Bank has prepared this ESSA according to the requirements of the Bank's Policy for PforR financing for adequately managing the E&S effects of the Proposed Program. The ESSA assesses the potential E&S effects of the PforR, including direct, indirect, induced, and cumulative effects as relevant. It also assesses the Borrower's capacity (legal framework, regulatory authority, organizational capacity, and performance) to manage those effects in line with the core principles of the World Bank policy for PforR. The specific objectives are as follows:

- Identify potential environmental and social benefits, risks, and impacts applicable to the Proposed Program activities.
- Assess the borrower's environmental and social management systems for managing the identified E&S effects relevant to these activities, including reviewing the policy, legal framework, and performance track record.
- Assess the extent to which the borrower's environmental and social management systems are consistent with the Bank's core environmental and social principles in the Bank policy and associated guidance materials (refer to Section 1.2 for further elaboration).
- Based on the identified gaps, recommend, and formulate measures for inclusion in the Disbursement Linked Indicators (DLIs) overall Proposed Program Action Plan (PAP) and the Proposed Program Operation Manual (POM) to enhance both the E&S management systems and the E&S outcomes during implementation.
- Describe the consultation process for the preparation and implementation of the proposed Program.

The findings and recommendations of the ESSA are subsequently factored into the operations' overall Integrated Risk Assessment, PAD, and PAP. The findings, conclusions, and opinions expressed in the ESSA document are those of the World Bank. Recommendations contained in the analysis will be discussed with the Hashemite Kingdom of Jordan counterparts. Recommendations from the Consultations and additional pre-appraisal discussions will also be integrated and reflected into this document.

## 1.2 Methodology

Developing the Environmental and Social Systems Assessment (ESSA) for the proposed Program for Results (PforR) was conducted during March and April 2024 and involved a collaborative approach, incorporating input from key stakeholders, including proposed implementing agencies, other government agencies, and non-governmental organizations. This process was tailored to Jordan's specific context and the activities associated with the PforR.

The World Bank team evaluated how well the PforR's systems adhere to essential environmental and social (E&S) principles. The first step in the process was to identify potential E&S risks and impacts and assess the possible effects of the activities funded under the PforR. The assessment is undertaken by bank E&S specialists and consultants using the following comprehensive approach, which employed the following methods:

1. **Document Review:** The Environmental and Social Systems Assessment (ESSA) team undertook a comprehensive review of various documents essential for preparing the ESSA. This review encompassed:
  - **PforR Documents:** Examination of materials produced during the PforR's preparation, including the Project Concept Note (CN) and other project and sector-related literature.
  - **World Bank ESSA Policies and Reports:** Review the World Bank's environmental and social assessment guidelines for PforR, PforR Policy, and the Bank Directive for Program-for-Results Financing. Additionally, the team reviewed ESSA reports from other World Bank PforR operations and related studies.
2. **National Legal and Regulatory Documents:** A thorough examination of Jordanian laws, regulations, policies, strategies, and guidelines focused on environmental and social (E&S) management for the PforR interventions. This included an assessment of official government publications and client-provided materials and a review of published media and web-based information. The complete list of documents reviewed is detailed in Annex I.
3. **Stakeholder Mapping and Consultation with Borrower Implementing Agencies During ESSA Preparation:** The ESSA team extensively mapped government and non-government entities, as outlined in Annex II. Following this mapping, the team conducted bilateral meetings and interviews during March and April 2024 with stakeholders from the MoE's relevant Directorates to discuss the environmental and social (E&S) risks as the project design evolved. The consultation meetings were done using pre-prepared question guides tailored to each stakeholder. These discussions focused on the implementation aspects of the PforR from an Environmental and Social (E&S) standpoint, assessing the strengths and limitations of their Social and Environmental (S&E) systems and formulating strategies to mitigate any adverse E&S impacts. List of the meetings are provided in Annex III.
4. **Consultation Session with 15 Civil Society Organizations (CSOs):** The session with CSOs relevant to the field of PforR focused on soliciting views on social and environmental risks related to PforR and understanding the context of implementation activities, including perceptions of government performance. Annex IV outlines the primary concerns and suggestions highlighted by CSOs during the discussion session.
5. **Drafting the ESSA:** The ESSA team, drawing from insights gained through document reviews and consultations with various stakeholders, prepared the initial draft of the ESSA. This draft was then presented for review to the World Bank project team and relevant government agencies.

## II. PROPOSED PROGRAM DESCRIPTION

### 2.1 Proposed Program Description

The proposed Operation will support key elements and incentivize results to increase efficiency in the implementation of selected interventions of the government program. The selection of the supported areas was made based on Bank's value added, readiness for implementation, an effort to build on JERSP and other recent engagement with the GOJ and prioritization of key interventions based on expected returns to the investment.

**The PforR will support three Result Areas (RA)** where the Bank's value added is expected to be strongest and there is no overlap with other Bank's or other development partners operations, as follows.

**RA 1. Home to school: Improving early learning and foundational skills through three strategic approaches:** (a) **increasing access to KG2** through public and private sector provision (b) **strengthening the quality of early childhood education** by adopting a quality assurance system for childcare, approving and rolling out comprehensive curricula for KG1 and KG2 alongside support materials for KG2 teachers, and supporting the scale-up of the KG QAS; and (c) **improving foundational literacy and numeracy skills for grade 1-3 students**, through the development of an implementation plan aimed at improving foundational literacy and numeracy, the adoption of updated teaching and learning materials in line with best practices and the implementation of targeted interventions designed to build foundational skills in the early grades. This RA is an extension of several existing engagements through the active Education PforR.

**RA2. School to work: Improving access to and labor market relevance of TVET** by (a) **improving the labor-market relevance** of TVET programs, responding to the job market and demand in priority sectors; (b) **facilitating the transition to employment and further education opportunities**, through implementing a competency-based certification system, the development of a graduate tracking system; and (c) **implementing and evaluating a pilot Skills Development Fund (SDF)** with multiple sources of financing windows, that stimulates private sector participation in TVET through competitive and performance-based financing. The operation will consider and respond to gender-specific and refugee-specific barriers for the school to work transition of students and prioritize sectors supporting the green transition.

**RA3: Strengthening governance and management of the education system** by (a) the **implementation of the new governance structure** of the education sector; (b) supporting learners through **strengthened counselling and career guidance services**; (c) the **development of a learning management system (LMS)** to facilitate the implementation of blended learning and enhance accessibility and resilience of educational services; (d) increasing the efficiency of the system in terms of teacher attraction, selection and allocation policies; and (e) **strengthening the financial management of the system**, through improved budget management tools and execution.

**The IPF component will provide TA and capacity-building activities to support the implementation of the Program and deliver critical reforms.** It will finance activities that contribute to improving efficiency of the planned program and the sustainability of results achieved and inform evidence-based policymaking through (a) consulting services, studies, and evaluations to inform implementation; and (b) capacity building activities for MOE, VTC and TVSDC. The TA includes support to carry out the following activities:

**RA1:** (i) Support the design and monitoring of the KG PPP; (ii) technical support to develop standards for the childcare QA system; (iii) support to improve and (as needed) design and evaluate interventions targeting foundational learning. **RA2:** (i) support the design of the skills development fund and evaluation of interventions; (ii) communication campaigns on the returns to TVET; (iii) develop appropriate training programs and material for in-service training of vocational education teachers (including transferrable skills training using hybrid modalities – face-to-face and online). **RA3:** (i) technical support to the implementation of the institutional restructuring including capacity building activities; (ii) develop the change management plan; (iii) develop job description and professional standards, based on those already drafted by TVSDC, for career guidance counselors that expands the current counseling service coverage from the exclusive focus on Clinic Psychology to also include future-oriented personal development and career counseling; (iv) develop appropriate training programs and provide in-service training to Field Directorate career guidance coordinators and school counselors; (v) develop the graduate tracking system; (vi) Establish domestic and international partnerships to enhance career guidance services, including local universities, colleges and technical colleges that already have well-consolidated student orientation centers/services and promote a “twining scheme” with secondary schools in their catchment areas; (vii) design of teacher policies based on best practices and international experience.

**The Program consists of nine DLIs chosen for their potential impact, the potential for the World Bank to add value, and sequencing of results in the form of DLRs toward the final output/outcome (Table).** DLIs were selected based on their potential to address key bottlenecks in specific moments of students’ education trajectories. DLRs aim to provide incentives for prioritization and sequencing of results and reflect Program milestones.

**Table 1. Overview of DLIs and DLRs**

DLI	DLR
<b>RA 1. Home to school: Improving early learning and foundational skills for learning</b>	
<b>DLI 1.</b> Increasing access to KG	<b>DLR 1.1.</b> Number of additional children enrolled in public and private licensed KG2
<b>DLI 2.</b> Strengthening the quality of early childhood education	<b>DLR 2.1.</b> Curriculum for KG1 and KG2 and support materials (including age-appropriate climate curriculum) for KG2 teachers approved and deployed. <b>DLR 2.2.</b> Number of KG2 classrooms meeting minimum quality standards, including climate/green adaptation and mitigation standards
<b>DLI 3.</b> Improving foundational literacy and numeracy skills	<b>DLR 3.1.</b> Implementation plan for improving foundational literacy and numeracy skills approved, including regular assessment and publication. <b>DLR 3.2.</b> Revised teaching and learning materials for reading and math for grades 1-3 (including age-appropriate climate curriculum) are (i) approved; and (ii) deployed in X schools nationwide.

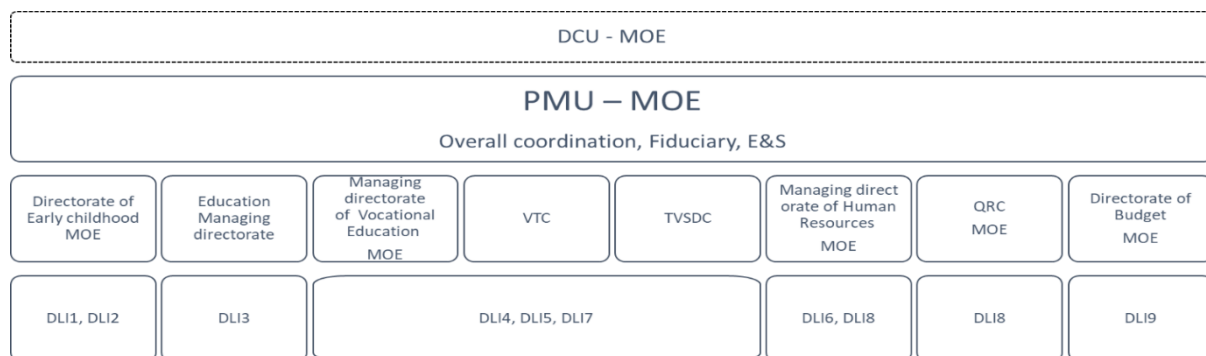
	<b>DLR 3.3.</b> Number of students in grades 1-3 in schools reached with targeted programs to improve foundational skills
<b>RA 2. School to work: Improving access to and labor market relevance of TVET</b>	
<b>DLI 4.</b> Creating, expanding, and funding pathways from TVET to further education and to the labor market	<p><b>DLR 4.1.</b> Regulation on an equivalence system to add flexibility and portability to TVET qualifications and certificates approved.</p> <p><b>DLR 4.2.</b> Transition rate from secondary level TVET to tertiary education-level vocational programs (including on climate-related career tracks)</p> <p><b>DLR 4.3.</b> Evaluation of a pilot of a skills development fund to finance vocational training ending with employment completed</p>
<b>DLI 5.</b> Enhancing access to labor market relevant TVET	<p><b>DLR 5.1.</b> Number of TVET graduates in degree programs in priority economic sectors of the EMV, including the green economy.</p> <p><b>DLR 5.2.</b> Mechanism and criteria of accreditation of training programs revised to align with labor market requirements, including in priority sectors and the green economy.</p> <p><b>DLR 5.3.</b> Number of vocational education teachers trained to deliver updated BTEC curricula, including in green economy sectors</p>
<b>RA 3: Strengthening governance and management of the education system</b>	
<b>DLI 6.</b> Implementing the new governance structure of the education sector (public sector reform)	<p><b>DLR 6.1.</b> Approved law for the creation of the Ministry of Education and Human Resources Development</p> <p><b>DLR 6.2.</b> Bylaws on new operating model issued.</p> <p><b>DLR 6.3.</b> Communication and change management plan implemented.</p>
<b>DLI 7.</b> Improve systems to support students and reduce drop-out and repetition	<p><b>DLR 7.1.</b> Revised functions and responsibilities of central unit, directorate and school level on counselling and career guidance approved in primary, secondary and TVET.</p> <p><b>DLR 7.2.</b> Number of students who received school-based counseling and career guidance across primary, secondary, and TVET.</p> <p><b>DLR 7.3.</b> National Graduate Tracking System for all TVET programs and providers established and operational</p>
<b>DLI 8.</b> Strengthening financial, procurement and human resources management in the education sector	<p><b>DLR 9.1.</b> New merit-based system for teacher selection and recruitment that is fully managed by MoE</p> <p><b>DLR 9.2.</b> IT system for budget planning, preparation, execution, monitoring and supervision streamlined in MOE.</p> <p><b>DLR 9.3.</b> Budget execution rate of the MOE improved.</p> <p><b>DLR 9.4.</b> Reduction in average procurement lead time between bid advertisement to contract signing.</p> <p><b>DLR 9.6</b> Reduction in rebidding case cases</p> <p><b>DLR 9.7</b> Reduction in average time for payment to the suppliers</p> <p><b>DLR 9.8</b> Developing and adopting Bidding Documents for specialized nature of procurement of textbooks.</p>

## 2.2 Proposed Institutional Arrangements for Program Implementation

The implementation arrangements of the Program will mostly follow the government’s program implementation arrangements and the active PforR arrangements which have been working well for the past six years. Arrangements will be adjusted according to the new governance system of the sector when and as needed. The MOE will be the implementing agency with the administrative and coordination support of the Development Coordination Unit (DCU).

Under the leadership of the Minister, Directorates will plan and implement activities related to their components. These include the Directorate of Early Childhood and Education Management Directorate (**RA 1**); Directorate of Vocational Education, VTC and TVSCD (**RA2**); Managing Directorate of Human Resources, Directorate of Budget, Queen Rania Center (QRC) (**RA3**), as well as other relevant MOE units as needed (Figure 7). The Program Operation’s Manual (POM) will be updated as required with the specific focal points for each DLI within the MOE, VTC and TVSDC.

**Figure 1. Implementation Arrangements**



### ***Introduction to the Implementing Agencies Mandate:***

This section briefly describes the mandate of implementing agencies under the program and their key responsibilities vis a vis the Program. Their environmental and social capacity are further described in Section 4.1.

Established in 1921, the **Ministry of Education (MoE)** is one of the nation's most longstanding ministries. It operates under the jurisdiction of Education Law No. (3) of 1994, along with its subsequent amendments and Law No. (31) of 2007. The MoE manages Early Childhood Education (ECE) for two years, followed by a ten-year Basic education program. Secondary education under the MoE branches into two tracks: an Academic path, preparing students for higher education, and a TVET path, designed to integrate students directly into the workforce. To facilitate its vast array of functions, the Ministry is supported by several administrative divisions, which reflect the structure and operations of 42 local Education Directorates spread across the kingdom's 12 governorates.

**The Technical and Vocational Skills Development Commission (TVSDC):** The TVSDC was established in 2019 under Article 31 of the Jordanian Constitution and the provisions of Law No. 9 of 2019, known



as The Technical and Vocational Skills Development Law. This law was aligned with the National Strategy for Human Resources Development directives, which specify organizational frameworks to govern the sector and ensure accountability. The TVSDC is overseen by a council called "The Technical and Vocational Skills Development Council," chaired by the Minister of Labor. The council's membership comprises the Minister of Education, the Minister of Higher Education, the Secretary-General of the Ministry of Labor, the president of the Accreditation and Quality Assurance Commission for Higher Education Institutions, a delegate from the Crown Prince Foundation, and representatives from the private sector, including the tourism, industrial, commercial, construction, communications, and health sectors.

**The Vocational Training Corporation (VTC):** The VTC was established under Temporary Law No. 35 of 1976 as part of Jordan's five-year Development Projects plan (1976-1980). Its founding objective was to expand workforce training and organize the labor market. Officially commencing operations in 1977, the VTC now functions under the permanent Vocational Training Corporation Law No. 11 of 1985, including its amendments made in 2001. VTC's services are accessible to all citizens, regardless of their educational levels, embracing continuous education and lifelong learning. It offers vocational preparation programs, efficiency enhancement programs for current labor market workers, and training and consulting in occupational safety and health to minimize workplace accidents. Additionally, VTC focuses on training of trainers (ToT) and supervisors in behavioral and administrative aspects and the development of small and medium enterprises.

### III. PROGRAM'S ANTICIPATED ENVIRONMENTAL AND SOCIAL EFFECTS

#### 3.1 Conceptual Approach to Environmental and Social Effects

The Environmental and Social Systems Assessment (ESSA) is a structured process designed to evaluate the environmental and social (E&S) effects associated with the proposed Program. This process unfolds in a series of methodical steps to ensure comprehensive coverage of all potential E&S risks and impacts.

1. **Step 1: Screening Proposed Program Activities** Under the World Bank Policy for Program for Results (PforR), activities that are "judged to be likely to have significant adverse impacts that are sensitive, diverse, or unprecedented on the environment and/or affected people are not eligible for financing and are excluded from the Program." The Exclusion List is included in Section 3.2.
  - **Step 2: Assessing E&S Principles** Following the preliminary screening, the next step, outlined in Section 3.4, is to evaluate the eligible activities against core E&S principles. This encompasses all activities delineated within the proposed Program's scope and expenditures, including those necessary for achieving the Proposed Program Development Objective (PDO), targeted results areas, overarching goals, and Disbursement-Linked Indicators (DLIs). This comprehensive screening serves to identify not just the direct impacts but also the secondary or consequential effects. These may include impacts indirectly associated with PforR financing or those resulting from proposed Program-related activities not directly funded by the PforR.

- **Step 3: Evaluating Borrower’s E&S Management Systems** An analysis of the borrower's capacity to manage E&S risks tied to proposed Program activities is conducted and presented in Section 4. This evaluation is critical in understanding the robustness and effectiveness of existing management systems.

The legal and institutional aspects are carried out to determine if:

- The design of the Proposed Program's E&S management system promotes sustainability, seeks to avoid, minimize, or mitigate adverse impacts, and emphasizes informed decision-making relating to the Proposed Program's E&S effects.
  - The system avoids significant conversion or degradation of natural habitats and physical and cultural resources under PforR financing criteria.
  - Measures are instituted to protect public and worker safety against construction and/or operation risks, exposure to toxic substances, hazardous waste, dangerous materials, and infrastructure rehabilitation in natural hazard-prone areas.
  - Land acquisition and natural resource access are managed to minimize displacement, with a commitment to improving or restoring the livelihoods and living standards of affected people.
  - The Proposed Program's E&S system recognizes the importance of cultural appropriateness and equitable access, particularly regarding Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities and VG.
  - The system is designed to prevent the exacerbation of social conflicts, especially in areas identified as fragile, post-conflict, or subject to territorial disputes.
- **Step 4: Addressing System Gaps** Based on the assessment, recommendations are formulated to bridge any identified gaps within the borrower's E&S risk management frameworks. These recommendations, aimed at enhancing the systems, are comprehensively included in Section Five. While the ESSA acknowledges the spectrum of E&S effects, including benefits, known impacts, and potential risks, its predominant focus is gauging the adequacy of the borrower’s systems in managing adverse impacts and associated risks. E&S risks are typically grouped into two broad categories for analysis:
    - Sustainability and Institutionalization: This category examines the durability and embeddedness of E&S management systems within the borrower's institutional framework.
    - Specific E&S Risks: This encompasses pollution, health and safety, cultural heritage, vulnerability of natural habitats, social inclusion, and equitable distribution of benefits. The interplay between these factors can amplify or mitigate the overall risk profile of the proposed Program.

The ESSA process ensures that the proposed Program's implementation aligns with environmental and social sustainability principles while effectively managing potential adverse impacts.

### 3.2 Exclusion List

Following the preliminary findings of the ESSA for this draft, the proposed Program does not anticipate yielding significant negative environmental or social impacts. Moreover, PforR financing should not be used to support the proposed Programs or activities within programs that, in the Bank's opinion, are restricted to funding. Consequently, an exclusion list has been formulated to delineate the specific activities that shall not be permissible within the Proposed Program's scope due to the potential risks and severe detrimental impacts they might inflict upon the environment or affected communities. The exclusion list shall comprise, but not be restricted to, the following:

- Significant conversion or degradation of critical natural habitats or critical cultural heritage sites.
- Air, water, or soil contamination significantly impacts the health or safety of individuals, communities, or ecosystems.
- Workplace conditions that expose workers to significant risks to health and personal safety.
- Land acquisition and/or resettlement of a scale or nature that will have significant adverse impacts on affected people or the use of forced evictions.
- Large-scale changes in land use or access to land and/or natural resources.
- Adverse E&S impacts cover large geographical areas, including transboundary impacts or global impacts such as greenhouse gas (GHG) emissions.
- Significant cumulative, induced, or indirect impacts.
- Activities that involve the use of forced or child labor.
- Marginalization of, discrimination against, or conflict within or among, social (including ethnic and racial) groups; or
- Activities that would (a) adversely impact land and natural resources subject to traditional ownership or under customary use or occupation.

### 3.3 Potential Environmental and Social Benefits and Risks

This section provides an overview of the potential effects<sup>1</sup>, including benefits and risks, identified by the Environmental and Social (E&S) team's comprehensive review and assessment. A detailed screening table of potential risks can be found in Annex V. Furthermore, Section 4.3 offers a thorough risk analysis consistent with the Program for Results (PforR) core principles, alongside proposed mitigation measures to manage identified risks effectively.

**It's important to note that the MoE is currently implementing the “Education Reform Support Program for Results” for the years (2018-2025)** which also aims to expand access to early childhood education and improve student assessment and teaching and learning conditions for Jordanian and Syrian refugee children. The program also prepared an Environmental and Social Systems Assessment (ESSA) to identify potential risks, assess country systems and capacities, and put into place a program action plan with mitigation measures. The ESSA highlighted several key areas of focus, including stakeholder engagement, land acquisition, child safety, and gender considerations. The assessment also emphasized the importance of addressing risks such as violence in schools, gender biases in school

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<sup>1</sup> Effect: Refers collectively to benefits, impacts, and risks under the PforR Program (Source: Bank Guidance on PforR Financing).

curriculum, inadequate support for children with disabilities, and vulnerability among poor Jordanians and Syrian refugees. Several of these risks are still valid till today and the current ESSA addresses several of them in addition to others that have been identified in accordance with the new design of the proposed operation.

**Overall, the ESSA and its addendum for the ongoing PforR provided a comprehensive assessment of the environmental and social risks and benefits associated with the program,** as well as recommendations and actions to improve the implementation of applicable systems. The program's focuses on stakeholder engagement, land acquisition, child safety, and gender considerations reflect a commitment to addressing key social and environmental concerns in the education sector in Jordan. The addendum also highlighted the following:

- Environment, and occupational health and safety provisions are not always adequately observed, particularly during construction activities. Therefore, more capacity building is needed to enhance the MOE E&S safeguards performance and reporting including OHS training, EHS incidents/accident reporting.

**USAID's Enhanced School Management Program (ESMP) is running in parallel** and is expected to significantly assist in improving the school planning and overall construction management functions, including environmental, health and safety and overall quality. Other international donors are active in school construction and together with NGO's are supporting MOE in areas of gender and school climate and many other areas. The Environmental and Social Performance of the program is rated Moderately Satisfactory primarily owing to delayed completion of Program Action Plan requirements to prepare and implement E&S Standard Operating Procedures (SOP), as well as the gender-related actions.

## IV. ENVIRONMENTAL AND SOCIAL MANAGEMENT SYSTEMS ASSESSMENT

### 4.1 Core Principle #1 – E&S Management Systems

*Program E&S management systems are designed to (a) promote E&S sustainability in the Program design; (b) avoid, minimize, or mitigate adverse impacts; and (c) promote informed decision-making relating to a Program's E&S effects.*

#### **Institutional Setup and Regulatory Framework**

Jordan's education sector, including its vocational training component, is robustly anchored in the nation's constitutional and legislative frameworks, which are firmly committed to advancing and protecting children's rights to education. Article 20 of the Jordanian Constitution mandates compulsory elementary education for Jordanians, free of charge in government schools. This directive is complemented by the provisions of the Child Law in Articles 16, 17, 21, 25, and 26. This is also complemented by Rights of Persons with Disabilities Law No. (20) of 2017, which marked a transformative step in improving education for persons with disabilities by embedding principles of respect, autonomy, and inclusion into national policies and educational practices. It prohibits discrimination in education, ensures active participation of persons with disabilities in decision-making, and mandates equal opportunities and gender equality in education. By focusing on the removal of physical and attitudinal barriers and mandating reasonable accommodations and accessible formats, the law facilitates a more inclusive and accessible educational environment. This comprehensive approach significantly enhances the educational landscape for persons with disabilities, promoting their full participation and inclusion in society.

**The Ministry of Education (MoE) in Jordan lead the educational process under Law No. (3) of 1994 and its amendments** spanning from early childhood through secondary education. At the core of its mission, the MoE ensures the provision of appropriate preventive health care and guidance in both government and private educational settings, fostering an environment conducive to learning and growth. This is complemented by efforts to strengthen the connection between educational institutions and their local communities through the establishment of school and parent-teacher councils, along with the promotion of community service and volunteer work.

**In the realm of early childhood education**, the Ministry of Education is dedicated to fostering an environment that supports the holistic development of a child, encompassing physical, mental, spiritual, and emotional growth. This foundational stage seeks to install healthy habits and cultivate a positive outlook toward schooling. To achieve this, the ministry endeavours to establish kindergartens, leveraging available resources to do so, although attendance at this level is not yet mandated by law.

**As students advance into basic and secondary levels of education**, the Ministry of Education guarantees that education at these stages is not only compulsory but also free of charge in public schools. The ministry sets forth specific age criteria for enrolment and makes provisions for students requiring special health accommodations. **At the basic education level**, the curriculum is designed to

foster comprehensive personal development, emphasizing the significance of craftsmanship and the respect for manual labor within society. **Secondary education** then provides students with the opportunity to pursue academic pathways tailored to their unique skills and interests, offering a rich blend of cultural, scientific, and vocational learning experiences that cater to the evolving demands of Jordanian society. This level is distinguished by its dual-track system: a comprehensive track offering a broad cultural education with the option for specialized academic or vocational study, and a vocational track aimed at equipping students with practical skills for the workforce. The Ministry of Education is responsible for defining the admission criteria for secondary education, thereby ensuring that the educational path of each student is well-structured and aligned with their personal and professional aspirations.

**The organizational setup of the Ministry of Education (MoE)** as delineated by the law articulates a structured approach to managing and facilitating education across Jordan. The MoE is tasked with establishing adequate administrative units and departments to ensure efficient operation and swift execution of tasks in accordance with the administrative organization of the ministry. This includes ensuring that the number of employees within the ministry and on the field is proportional to the number of students and teachers in all educational institutions, enabling them to effectively carry out their duties and contribute to the success of the educational process. At the provincial and district levels, the MoE establishes Directorates of Education, each led by a Director of Education and supported by staff members. These directorates are responsible for the successful implementation and development of educational processes within their respective regions.

**The law also stipulates specific qualifications for various educational roles within the MoE** and its directorates. Department heads and specialized technical members are required to be qualified in an educational phase and possess at least five years of educational experience within the ministry. Educational supervisors must have appropriate qualifications for the educational stage they are involved in, with a minimum of five years of experience in teaching or school administration, and preferably hold a master's degree. School directors are required to have an educational qualification with at least one year of study beyond the bachelor's degree and five years of teaching experience.

**Educational counsellors appointed after the enactment of this law must hold at least a bachelor's degree in educational guidance,** mental health counselling, or psychology. This ensures that individuals in key positions are well-equipped with the knowledge and experience necessary to support and enhance the educational system.

**The Law outlines the establishment of local education committees in every governorate and district.** These committees are formed by the minister and chaired by the administrative governor, with the Director of Education serving as the deputy chair. The composition of these committees includes official and community representatives, as well as **parent-teacher councils** within the governorate or district. Their primary mission is to contribute to the development of education and achieve the objectives of the educational process. This structure facilitates active community involvement in educational decision-making, ensuring that educational initiatives are aligned with local needs and priorities.

**The law also deals with curricula, textbooks, and general examinations.** It specifies the foundations for developing curricula and textbooks, including their writing, translation, review, selection, development, and compensation for such work. Regulations issued under this law will govern these aspects, ensuring that educational materials are up-to-date and relevant and contribute effectively to the learning objectives.

**Vocational training within the formal education system of Jordan is governed by the Law of Technical and Vocational Skills Development Commission, numbered 9 of 2019.** This law establishes the Technical, Vocational, and Skills Development Commission (TVSDC) as an independent entity with legal, financial, and administrative autonomy. Endowed with the authority to undertake all legal actions, including property ownership, contracting, donation acceptance, and litigation, the commission operates to achieve its objectives effectively. The commission's responsibilities include the approval, accreditation, and monitoring of institutes and entities providing vocational training. It regulates their activities, evaluates programs, and ensures compliance with standards and requirements, particularly for vocational-technical training not tied to educational degrees. The commission oversees programs such as vocational secondary schools, vocational training programs, continuous training initiatives, and newly established training programs. Additionally, it sets admission criteria, develops curricula tailored to sectoral needs, approves budgets, organizes vocational employment, and registers vocational training qualifications within the national framework. Furthermore, the commission monitors examinations and certificates issued by vocational training institutions, establishes requirements and conditions for licensing, and issues licenses or accreditations to training institutions in both the private and public sectors.

**The structure and functions of vocational training in Jordan are further defined by the Vocational Training Corporation (VTC) as outlined in Article 3 of Law No. 11 of 1985.** According to this law, the VTC operates under the authority of the Minister of Labor while maintaining independent legal, financial, and administrative status. The law delineates the primary objectives of the VTC, the foremost being the provision of vocational training opportunities to cultivate skilled labor across various sectors, including occupational health and safety training. Moreover, the internal regulations for vocational training programs, established in 2019, underscore the VTC's responsibility for designing and implementing three tiers of training programs: Vocational Diploma, Skilled, and Limited skills programs. These programs are tailored to different sectors to meet the demands of the labor market effectively.

**The proposed Program must also comply with and meet the requirements of Jordan's environmental and public health regulatory landscape;** a well-defined regulatory landscape, with specific responsibilities allocated to different governmental entities.

- ***Under the Environment Protection Law No. 6 of 2017***, the MoEnv is designated as the primary authority for environmental protection. The MoEnv is empowered to issue environmental licenses, conduct inspections of establishments, and implement remedial measures in cases of significant pollution incidents.
- ***Under Public Health Law No. 47 of 2008*** (amended), the Ministry of Health (MoH) is the competent authority accountable for protecting public health in the country. MOH is empowered to issue licenses to healthcare facilities, conduct inspections of establishments,

and implement preventive, control and remedial measures in cases of health risks including spread of diseases (epidemics, pandemics and vector-borne diseases).

- **Under the Law amending Labor Law No. (10) of 2023**, the Ministry of Labor (MoL) is responsible for regulating and supervising employer-employee relations in all types of businesses. The law delineates the obligations and rights of the employees and their employers. Several bylaws, regulations and instructions have been developed and enacted to address related considerations, including EHS and maintaining safe working environment, adherence to an appropriate code of conduct, and providing welfare benefits to employees.
- **The above-listed laws and decrees are applicable throughout the Kingdom of Jordan**, except for the Aqaba Special Economic Zone (ASEZ). The ASEZ follows its environmental regulations as specified in Decree 21/2001. This decree outlines the Environmental Impact Assessment (EIA) system in ASEZ, waste management protocols, standards for emissions, ambient air, noise, and the protection of natural habitats.

Annex VI provide the General regulations applicable to the PforR in relation to environmental and social aspects.

**In Jordan, the framework for regulating environmental standards and overseeing social aspects of projects is predominantly orchestrated by the Ministry of Environment (MoEnv)**, in accordance with Law 6/2017 and Law 16/2020. An exception to this is found within the Aqaba Special Economic Zone (ASEZ), where the responsibility for environmental oversight and regulation falls under the Aqaba Special Economic Zone Authority (ASEZA). The Environmental Regulation Directorate of ASEZA holds the mandate to administer and implement the 2001 Regulation for the Protection of the Environment specifically within ASEZ.

**The ministry operates through specialized departments and committees that ensure environmental compliance and social safeguarding in project implementation.** Hence, the environmental screening process is occasionally initiated upon municipalities receipt of occupational licensing applications for recently registered companies/businesses or for the annual renewal of the occupational licenses. The municipality recipient of such applications/requests undertake initial screening to determine to which project category the application falls under Decree 69/2020.

**The Environmental Licensing Department is the initial point of entry for project applications within the MoEnv.** These applications are assessed by a Licensing Committee, which classifies projects according to EIA categories as stipulated in Decree 69/2020. Specifically, projects falling under Categories 1 and 2 are escalated to the EIA Department for further scrutiny and the preparation of either an EIA or a Preliminary Environmental Impact Assessment (PEIA).

**The EIA Committee, a multisectoral body comprising 17 representatives from various governmental agencies, reviews the assessments.** On approval, the Licensing Department issues the requisite environmental license, and the project documentation, including the EIA or PEIA and the associated Environmental Management Plan (EMP), is forwarded to the Environmental Inspection Department for ongoing oversight. For inspections, the Environmental Inspection Department operates within the framework of Inspection Law 33/2017 and is guided by additional decrees like 110/2018 and 113/2018, which clarify inspection protocols and inspector qualifications, respectively. This



department is responsible for monitoring compliance across all EIA categories, and it coordinates its activities with other governmental entities to avoid redundancy and ensure efficiency. Inspectors are subject to stringent qualification criteria, which include academic credentials, years of experience, and mandatory training courses.

**The Inspection Department employs a risk-based approach in planning inspections**, considering variables such as project risk profile, previous compliance history, and complaints from the public. Non-compliance triggers a cascading set of actions that could result in fines or temporary project closure. The department collaborates with the Environment Police Department to enforce compliance, although its capacity is constrained relative to the number of facilities requiring inspection. Remarkably, since the inception of the original environmental law in 2003, only a few Categories 1 EIAs have been rejected. The rejection criteria have included technical inaccuracies, non-compliance with spatial regulations, and public opposition.

**Annex VII provides General regulations applicable to the Proposed PforR, which include other laws and regulations** related to the protection of children, access to education, and social risk management for land acquisition and resettlement.

### **Implementation Performance Assessment**

**The MoE's organizational hierarchy is structured** with the Minister at the apex, followed by two Secretaries General—one overseeing Financial and Administrative Affairs and the other Educational Affairs. Below them are several directorates and units, which in turn, oversee multiple divisions. The Program is designed to engage with various divisions and directorates, as delineated in the program design and based on the insights gathered from meetings and interviews with these directorates, detailed in Annex III. However, it is important to note that the Ministry of Education lacks a dedicated department to manage social risk or address the social dimensions of its projects. This responsibility is dispersed across various ministry segments and does not fall explicitly within its stated functions and mandate. The following analysis evaluates the institutional capacity, focusing on the relevance of each directorate to the subject of assessment.

#### **In terms of the initial Program's focus on expanding the kindergartens and vocational training facilities within designated Results Areas 1 and 2, Top of Form**

the Jordanian government agencies, as well as the private sector, have extensive experience in school design, contracting, construction, supervision, extension, rehabilitation, and operation and maintenance. The World Bank already has long-standing experience supporting the Hashemite Government of Jordan in the construction and rehabilitation of schools since 1989. The MoE is currently implementing the Education Reform Support Program for Results (PforR) which was approved in 2017. Concurrently, several other donors including the United States Agency for International Development (USAID), KfW, JICA, Korea, UNESCO, UNICEF, etc. are supporting the ministry and the education sector with numerous programs and interventions.

**The Ministry of Education (MoE) oversees the implementation of educational projects, including the expansion and maintenance of school infrastructure.** While the MoE spearheads these initiatives, it lacks a dedicated department for managing the social aspects and risks of its interventions, leading to

fragmented responsibility. The Ministry of Public Works and Housing (MPWH) is tasked with executing civil works for Early Childhood Education (ECE) expansion, under the coordination of the MoE's Buildings and International Projects Department. This department, which encompasses Engineering Construction, Maintenance, and Assets Directorates, employs 94 staff members, including 70 engineers, and is responsible for new constructions, classroom additions, and maintenance of existing buildings.

**Prior to 2004, the Ministry of Education (MoE) managed both the design and construction of schools.**

Following this period, the establishment of the Government Buildings Department (GBD) and the General Tenders Department (GTD) within the Ministry of Public Works and Housing (MPWH) shifted the responsibility for school architecture and construction to these departments. The 2021 enactment of the Government Buildings Bylaw, particularly Article B-3, further centralised this process by prohibiting all ministries from preparing studies, designs, and supervisory activities, designating these responsibilities exclusively to the GTD.

**During the design phase, the MoE ensures adherence to educational planning and guidelines,** though it entrusts the actual execution of design and construction to the MPWH. The MoE provides consultative support during the tendering process and limited oversight during the construction supervision phase, in line with its remit. Commissioning involves collaboration with the taking-over committee to hand over school facilities, although premature utilization of these buildings can result in damages and additional challenges. In the operational phase, the capacity of new or extended schools frequently surpasses planned limits, reflecting the ambition for high educational standards. As provided by the stakeholders, the maintenance phase highlights the necessity for dedicated technical maintenance experts to address issues arising from the day-to-day use of school facilities.

**In the process of preparing and updating the school mapping plan, relevant municipalities and stakeholders are engaged for their input.** Additionally, consultations with the Ministry of Environment, the Department of Antiquities, and the Water Authority of Jordan will occur as necessary. These discussions will focus on identifying specific needs concerning access routes, infrastructure availability, and the potential impact on historical and cultural heritage sites. The construction process encompasses several stages, ranging from initial planning to eventual operation and maintenance.

**Legislative barriers significantly impede the MoE in overseeing school construction efforts.** The Government Buildings Bylaw, specifically Article B-3 as provided above, restricts ministries from engaging in essential studies, designs, and project oversight, assigning these responsibilities to the Ministry of Public Works and Housing (MPWH) for projects costing over 25,000 JD. This situation presents several challenges:

- Extended timelines in the design, bid preparation, and tendering stages, subsequently postponing the start of construction.
- Lack of proper oversight, leading to the construction of school facilities that do not meet quality standards.

- The MoE endures the consequences of contract cancellations with contractors, even though the MPWH is in charge of project implementation and supervision for schools associated with the MoE.
- Significant cost variances are evident between schools constructed under the MoE's supervision and those managed by the MPWH, with the latter's projects generally incurring higher expenses.

To address these challenges for projects valued below 250,000 JD, the MoE proposed establishing an Engineering Design Bureau within its Engineering Construction Section, equipped with 20 engineers across various specializations, organized into four teams. However, this proposal was declined by the MPWH, led by a minister who also chairs the National Building Council.

**Moreover, the availability of suitable land is a major hurdle for the expansion of school infrastructure.** Issues such as unsuitable plots, land use restrictions, encroachments, and the need to consolidate parcels complicate the process. Optimal lands, often owned by the Ministry of Agriculture, the Ministry of Awqaf, and municipalities, would require reallocation to the MoE through land swapping for school construction purposes.

**Donor-funded projects introduce additional requirements** regarding land, including minimum size mandates (five dunums) and provisions for refugee support, often leading to delays when available lands fail to meet these specific needs.

**The COVID-19 pandemic also caused notable disruptions in the education sector,** compounded by ongoing demographic changes due to Syrian refugees' influx. In response to the pandemic, approximately 230,000 students transitioned from private to public schooling, prompting the government to implement temporary measures like leasing additional school spaces and adopting double-shift systems. These actions, however, compromised the quality of education and diminished the nation's standing on international education benchmarks, most notably affecting students in grades 4 to 9, although measures were taken to address issues in grades 1 to 3 as well. The Ministry of Education (MoE) oversees 4,165 schools, denoting operational units rather than physical structures, with 800 schools being rented facilities that constitute 28% of the total and typically do not offer optimal learning environments. Furthermore, the introduction of a double-shift system in 1,000 schools, ending the second shift around 5-6 PM, has led to social issues and familial conflicts.

**In terms of schools' maintenance, the MoE has a substantial task of sustaining the upkeep of over 4,000 schools.** Maintenance needs were traditionally assessed by site visits from the Building Sections of 42 Education Directorates. These assessments informed the tender process, which was constrained by the budget. Recently, a shift occurred with introducing a USAID-supported initiative (Enhanced School Management Program- ESMP project), which brought about a tablet-based field survey system for maintenance needs assessment. Conducted annually over two months, this survey uses a structured questionnaire to classify maintenance needs into high, moderate, or low categories.

**The central Maintenance Directorate's engineers at the Ministry of Education are tasked with Quality Assurance of school maintenance,** which includes on-site inspections. A new tool, the Estimated Cost, has been implemented for drafting Bills of Quantities and technical specifications. In

2023, there was a significant budget shortfall for maintenance, with only 15 million Jordanian Dinars available against a requirement of 47 million, leading to the prioritization of maintenance tasks. In cases of emergency maintenance, the school administration is notified, and an inspection is conducted within 24 hours.

**Furthermore, the Maintenance Directorate plans to introduce a Maintenance Operation Template this year**, which consists of three parts. The first part assigns maintenance staff to groups of five schools, along with a checklist that is overseen by an engineer from the Building Section of the local Education Directorate, who does not oversee school construction or classroom addition supervision. At present, the education sector lacks a Facilities' Management system.

**Within the MoE, the Directorate of Assets and Investments operates as part of the Buildings and International Projects Department.** This directorate is organized into five divisions: the Public-Private Partnership divisions, the Land Acquisition (also known as "Expropriation") divisions, the Renting and Investment divisions, Decentralization Councils, and Employment Housing. The team responsible for Land Acquisition consists of nine professionals, including skilled engineers who manage the ministry's land acquisition efforts in twelve governorates. Previously, for thirty years, this unit functioned independently as a "Directorate" with five members—a Director, a Section Head, two engineers, and one administrative staff. However, in 2015, it was reclassified as a "divisions" and its staff was reduced to just one employee.

The duties of the Land Acquisition Section include:

- Securing land necessary for the construction of schools, either through expropriation or by reallocation other public lands;
- Developing the "Annual Expropriation Plan" and assessing financial claims associated with land acquisition;
- Engaging in official correspondences with government entities to facilitate various land acquisition processes (such as acquisition, reallocation, annexation and consolidation of land parcels, removal of land suspension, and addressing encroachments);
- Conducting physical inspections of lands and overseeing related procedures;
- Ensuring that lands targeted for acquisition are free from any complications or disputes;
- Transferring lands to the consulting firm during the school design phase;
- Working in conjunction with the Renting and Investment Section to carry out physical inspections of rented buildings.

**To facilitate school expansion through Public-Private Partnerships (PPP), the PPP Section was established within the Buildings and International Projects Department of the MoE in March 2023.**

Initially, this section lacked experience in managing PPP agreements and continues to be understaffed, operating with only one member. Since 2019, the Ministry of Finance (MoF) and its PPP Unit have been progressing on various PPP initiatives for constructing schools. A notable project, conducted in collaboration with the International Finance Corporation (IFC) and the European Bank for Reconstruction and Development (EBRD), aimed to construct fifteen public schools. The IFC provided Transaction Advisory services and carried out essential studies, including the Environmental and Social Impact Assessment (ESIA). The Request for Quotation (RFQ) was issued in December 2021, attracting bids from six firms. Nevertheless, the bidding encountered several hurdles:

- The construction sites were not definitively chosen before initiating the bid process.
- Bidders expressed concerns over site conditions, such as flood risks due to slope not accounted for in the ESIA and proximity to highways that could endanger students, requiring design adjustments.
- The Higher Committee for PPP projects showed reluctance towards adopting the PPP model.
- The MoF declined to offer local tax exemptions to bidders, raising the transaction's costs.
- Significant differences existed between local and international environmental and social standards, especially regarding land acquisition and the Grievance Redress Mechanism, which the Ministry opted not to disclose.

**The International Finance Corporation (IFC) finalized its Due Diligence Report, and the Transaction Report was endorsed by the MoE in November 2023**, paving the way for the re-tendering of the project, which has not yet taken place. As for the second phase, which aims to add 25 more schools, progress is on hold as the selection of sites is ongoing. Of the potential sites identified, 12 have received approval, and 8 are still under review. The site selection process involves several steps: initial identification by the School Mapping Section within the Planning and Educational Planning Department, followed by the Assets and Investment Directorate for land evaluation to ensure suitability, the Studies Section then assesses engineering feasibility, and it concludes with the Land Acquisition process.

**The newly enacted PPP Bylaw No. 9 of 2024 establishes a comprehensive framework for initiating and managing PPP projects**, detailed as follows:

- Ministries begin by submitting initial PPP proposals to the Public Investment Management (PIM) Unit in the Ministry of Planning and International Cooperation (MoPIC) for inclusion in the National Registry for Investment Project (NRIP).
- The PIM Unit evaluates these proposals, including site assessments and feasibility study requests, and upon deeming a project viable, registers it in the NRIP.
- A Project Committee then undertakes the project preparation phase, conducting feasibility studies that encompass environmental and social impact assessments and climate change responsiveness evaluations.
- The feasibility study findings are forwarded to the Minister of Investment, who presents them to the Higher Committee on PPP Projects for their decision to either proceed with or halt the project.

**The anticipated increase in demand for vocational training necessitates the expansion and modernization of Vocational Training Center (VTC) facilities**, including workshops, across all governorates in Jordan (Amman, Irbid, Zarqa, Balqa, Jarash, Ajloun, Mafraq, Karak, Tafila, Maan, and Aqaba). The proposed program aims to construct, expand, modernize, rehabilitate, and maintain vocational training infrastructure. This encompasses schools, training centers, institutes, workshops, and classroom additions. It also plans for the provision and integration of furniture, equipment, tools, computers, electronic devices, and other necessary materials across various training settings.

**Two main institutions are pivotal to the expansion of VTC facilities:** the TVSDC and the VTC. As of the end of 2020, the TVSDC supervises 301 accredited centres, has successfully executed 110 TVET-funded

projects, administered 926 accredited programs, and has awarded 14,000 certifications since its establishment. The commission is actively working on improving its management systems and procedures, with the completion timeline still pending. On the other hand, the is to provide vocational training opportunities that cultivate a qualified labor force in various sectors, including Occupational Health and Safety (OHS) training. However, the VTC law does not explicitly detail the VTC's environmental policies, management systems, or duty to address the environmental and social risks inherent in vocational training.

**Associated with the construction and civil works are risks related to occupational health and safety (OHS)** that affect students, teachers, and educational facilities, along with potential pollution from hazardous and non-hazardous wastes and health and safety concerns for nearby communities. These risks are deemed "Moderate" and may arise from potential non-compliance with national environmental regulations and established good practices in construction.

**Operational risks at the training workshops and facilities include waste management (especially hazardous waste),** OHS concerns, and public health and safety for students, teachers, and surrounding communities. These risks are also categorized as "Moderate," potentially stemming from inadequate or absent environmentally focused regulations for Technical and Vocational Education and Training (TVET), non-adherence to environmental safeguards, and insufficient environmental monitoring within vocational training operations. The impact of these risks could vary depending on the specific "priority sectors" targeted by the program.

**Implementing organizations currently face a lack of environmental policies, regulations, strategies,** Environmental and Social Management Systems (ESMS), and the necessary resources or capacity to leverage environmental benefits and mitigate risks associated with the program. However, exceptions exist, such as the Jordan National TVET Strategy (JNTS) and the VTC's mandate, which include providing training and consultancy in occupational safety and health to minimize workplace accidents.

**The Jordan National Training Council (JNTC) for 2023-2027 aligns with the principles set forth in the National Strategy for Human Resource Development (2025), emphasizing Access, Quality, Accountability, Innovation, and Mindset.** The JNTC has embraced a vision focusing on environmental sustainability, articulated as "A sustainable and innovative TVET system that fosters self-employment, produces a skilled and diverse workforce, and supports Jordan's economic, social, and environmental development." In line with this vision, several JNTC programs and projects specifically address environmental and sustainability concerns:

- **Develop a Green TVET Strategy (Programme 1.8):** This initiative encompasses all projects and activities aimed at integrating sustainability skills into all TVET provisions, ensuring they meet industry needs. Key aspects include incorporating sustainability practices and teaching within the national regulatory framework (JNQF), enhancing the capabilities of VET instructors to teach sustainability skills, and conducting strategic reviews of Training Packages to include sustainability knowledge, skills, and principles.
- **Innovation and Entrepreneurship (Programme 3.4):** Highlighting the importance of entrepreneurial skills and competencies, this program aims to prepare students not only for traditional entrepreneurial roles but also for modern employment opportunities where such

skills are increasingly valued. The focus is on curriculum development that offers active, real-life learning experiences for acquiring entrepreneurial skills. Efforts include supporting teachers and trainers technically and financially and revamping pedagogical approaches to make entrepreneurship education more practical and aligned with real-world demands.

- **Inclusive TVET (Programme 3.8):** Recognizing the role of TVET in enhancing labor market outcomes for migrants, disadvantaged youth, and marginalized groups, this program is dedicated to making the TVET sector more inclusive. It encompasses support for women, refugees, and marginalized individuals to access high-quality training opportunities. Additionally, it provides technical and financial assistance and expertise on gender equality in TVET, offering tools and rationales to promote inclusion and aid in the post-COVID-19 pandemic recovery for the most affected populations.

Furthermore, the JNTC has highlighted a project aimed at addressing a key environmental sector in Jordan:

- **Introducing a Waste Recycling Program to Train and Employ Youth (Project 2.2.2):** Under Pillar 2 "Enhancing Quality and Relevance of TVET Provisions" and Programme 2.2 "Curricula Development," this project focuses on developing a waste recycling program that trains and employs young people, contributing to environmental sustainability and providing valuable skills for the workforce.

**Regarding the Risk Management of the Ministry of Education's (MoE's) operations, the MoE formed the Crisis Management Section within the Institutional Development Directorate, part of the Planning and Educational Research Department, a year ago, with UNESCO's assistance.** Staffed by four members repositioned from the ministry's existing workforce, this section is tasked with several key responsibilities:

- Developing risk and crisis management policies that align with the Ministry's strategies and adhere to global standards.
- Employing a risk matrix to identify potential threats to the Ministry's strategic objectives and evaluating their potential impact.
- Establishing a comprehensive risk management strategy that includes preventive measures, overseeing their application, and assessing their impact.
- Working in partnership with the National Center for Security and Crisis Management (NCSCM) to create detailed emergency response plans.
- Raising risk awareness among the MoE staff, providing specialized risk management training to technical staff, and compiling reports on the effectiveness of risk management practices to guide decision-making.
- Compiling and disseminating a record of past incidents to foster a culture of knowledge sharing and learning among the staff.

**The MoE has also developed the Crisis and Risk Management Strategy for the period 2023-2027, focusing on enhancing the education sector through four key pillars:** improving systems and governance, ensuring safe learning environments, maintaining school safety and educational continuity, and raising awareness for risk mitigation and resilience. The ministry is in the process of

creating a detailed plan to put this strategy into action, having pinpointed 26 specific types of risks. A "coordinated plan" for social protection has also been initiated, encouraging all ministries under the National Council for Social and Crisis Management (NCSCM) to prepare their own action plans in line with the resilience and disaster response component of the National Strategy for Social Protection. So far, eight of the expected 26 coordinated plans have been formulated, covering issues like climate change, earthquakes, hazardous chemicals, electrical failures, and potential flooding from the Wallah dam, with future strategies to address social challenges such as vandalism, domestic violence, and child labor.

**Additionally, the ministry is working towards integrating crisis and risk management into the education system** by updating curriculums to include risk management topics, launching a new platform for training and awareness aimed at everyone involved in school life and their communities. Schools are undertaking self-evaluations of their risk management procedures, internally and within their communities, laying the groundwork for the development of Contingency Plans that involve local community participation. The ministry is also aiming to establish Standard Operating Procedures (SOPs) for a structured approach to crisis and risk management.

**Various social dimensions are addressed by distinct departments and sections within the MoE,** encompassing areas such as land acquisition, gender mainstreaming, inclusive education, school violence, and counselling services. These topics will be further explored in subsequent sections under the relevant Core Principals. Hence, environmental dimensions linked to the ministry mandate and operations are not sufficiently integrated within the ministry decision making, organization structure and management systems.

**In terms of the Environmental Licensing and EIA Process as part of the environmental system, the MoEnv has streamlined the environmental licensing process within the broader regulatory framework,** ensuring effective response to all applications, irrespective of whether the project proponent is a governmental or public entity. This aligns with findings from the Netherlands Commission for Environmental Assessment, which in February 2020 concluded that Jordan maintains a robust and user-friendly regulatory framework for Environmental Impact Assessments (EIAs) as mentioned below. Approximately 30 comprehensive EIAs are performed annually in Jordan (See Table 6), bolstering a growing community of experts in government and consultancy sectors.

**The evaluation of the streamlined environmental licensing process notes the role municipalities play as responsible authorities for businesses occupational licensing,** and as such responsible for the undertaking of initial environmental screening of projects and companies. Upon consultation of the MoEnv (Environmental Licensing Directorate) in January 2024, it is noted that the capacity of municipalities to effectively apply the initial environmental screening process is in need for further enhancement, the licensing system needs improvement, and the streamlining and collaboration processes needs to be strengthened.

**Table 5: Number of license applications and granted licenses by the Ministry of Environment in the period 2019 to 2022 (Source: Ministry of Environment)**



Year	Number of license applications for new projects and expansions	Number of granted licenses for category (1) projects	Number of granted licenses for category (2) projects	Number of granted licenses for category (3) projects
2019	2496	21 (4 of them for public/ Government projects)	17 (4 of them for public/ Government projects)	2025
2020	1500	28 (8 of them for public/ Government projects)	3 (1 of them for public/ Government projects)	1207
2021	1909	22	21	1647
2022	1884	35	24	1502

### 1. Staffing and Workload in Environmental Oversight:

- **Structure and Staffing:** The EIA and Licensing Department are relatively small, consisting of two and four staff members, respectively. However, the final decisions related to EIA and Preliminary Environmental Impact Assessments (PEIAs) are not solely dependent on these staff members but are made by specific committees for this purpose.
- **Workload and Efficiency:** Despite being leanly staffed, the Licensing Department manages a substantial workload, particularly conducting site visits for licensing applications across Categories 1, 2, and 3. Most of these visits relate to Category 3 projects, which are generally smaller in scale. This focus enables the department to process all applications promptly.
- **Capacity Building and Technical Support:** The EIA Department benefits from international donor-supported capacity building, especially concerning the new 2020 decree on risk assessments. In addition, the department collaborates with Deutsche Gesellschaft für Internationale Zusammenarbeit (GIZ) to integrate gender considerations into the EIA process.
- **Capacity Building and Gender Sensitivity:** The EIA department gains technical strength through international donor support. Collaborative efforts with GIZ are also in place to integrate gender considerations into EIA protocols.

**In compliance with existing regulations, the proposed Program activities under discussion are classified** as Category (iii) or Category (iv) projects, signifying low or no environmental risk. Therefore, they do not require MoEnv approval or an environmental license. However, they must adhere to general environmental conditions of noise management and waste disposal. Despite the low-risk classification, the proposed Program must still consult MoEnv for environmental screening if activities fall under the first three project categories outlined in Regulation 69 of 2020. This is particularly related to (1) the support awarded to women enterprises under RA2, (2) the support to the GoJ undertaking

to improve the affordability and safety in and around public transportation under RA3 which will include supporting the preparation of official implementation plan to enhance women's access and use of public transportation would be developed and adopted, (3) the activities designed to enhance safety in public transportation (by LTRC, under RA3), and (4) the support to the establishment, expansion and operation of childcare facilities under RA4. Additionally, the proposed Program must comply with the Waste Framework Law (Law 16 of 2020) and any pertinent regulations or instructions issued by the Ministry of Environment. The program needs to (1) build the capacity of the implementing agencies and directly related stakeholders about OHS, public health and safety, environment protection and compliance with national environmental regulations, resources efficiency, and waste management, and (2) to raise Program actors and beneficiaries' environmental awareness and capacity to Environmental risks and impacts.

## ***2. Inspection Protocols and Enforcement:***

**Environmental inspections are orchestrated by a separate Inspection Department consisting of 58 inspectors** who cover the entire country, excluding the ASEZ. Inspections are planned according to multiple criteria, such as project risk level, past compliance records, and public complaints. When violations are identified, the Inspection Department conducts a follow-up visit within 2 to 4 weeks. Persistent non-compliance triggers legal repercussions, including fines and potential temporary closure of the offending facility. The bulk of identified violations relate to non-compliance in waste disposal, dust, noise, and emissions, according to analyses by MoEnv-accredited laboratories.

The Environment Police Department supplements the Inspection Department's activities. However, given the extensive scope of facilities subject to inspection, the current staffing levels provide limited capacity for comprehensive oversight, and is in need for enhancement. The department focuses on operational projects and conducts fewer inspections during construction, often initiated only in response to complaints.

**While both departments are efficiently managing their respective duties despite staffing constraints, there are areas where additional resources** and focus are required for more comprehensive and proactive environmental oversight. It's worth mentioning that the World Bank-supported Inclusive, Transparent, and Climate Responsive Investments Program for Results (P175662) aims to bolster MoEnv's monitoring and inspection capacities, addressing some of the gaps identified. This support successfully increased the number of environmental inspection visits conducted by the Directorate of Environmental Inspection and Control from 437 visits in 2019 to 1180 visits in 2022 and 1024 visits in 2023 (until November 2023).

## ***3. Waste Management:***

**MoEnv oversees the High Committee of Waste Management, which collaborates with line ministries responsible for regulating waste in their respective domains.** Among the facilities managed by MoEnv is the Swaqa hazardous waste treatment facility, located about 125 km south of Amman. Operational since the late 1990s, this facility primarily handles expired medicines from pharmaceutical plants, IT waste, asbestos, and other special types of waste. The Swaqa facility is well-equipped with fire-extinguishing systems and groundwater monitoring wells. Additionally, private sector involvement includes 5 companies for treating healthcare waste, two incinerators for healthcare waste, and various

companies for recycling materials like used oils and batteries. Furthermore, 12 licensed companies transfer hazardous waste to Swaqa and other recycling/treatment centers. This infrastructure suggests that Jordan possesses a well-established framework for hazardous waste management, albeit with room for improvement.

**Under Waste Management Law No. 16 of 2020, the MoEnv is in the final stages of developing a centralized national hazardous materials and waste database.** This database aims to collate information on users of hazardous materials and generators of hazardous waste, thus facilitating enhanced monitoring and disposal procedures. However, the ministry cannot closely monitor hazardous material (HAZMAT) management due to constrained human resources unless specifically approached by waste generators. Therefore, the primary challenge lies in enforcing regulations compromised by limited resources and capacity within MoEnv to control and monitor hazardous materials and waste handling adequately.

**Regarding e-waste management,** the MOE has established an internal protocol to gather old and unused equipment from schools, where reusable equipment's/devices are then refurbished by a local non-profit organization for subsequent reuse by charitable organizations.

***The analysis of risks, capacities and challenges linked to E&S requirements in Jordan and the assessment by the Netherlands Commission for Environmental Assessment in February 2020 highlighted:***

- The regulatory framework for EIA is robust, featuring well-defined procedures for key steps like screening and review. The process is user-friendly and adheres to specified timelines.
- Annually, Jordan conducts approximately 30 comprehensive EIAs. This work is primarily carried out by governmental personnel and consultants, with limited contributions from academics and international experts.
- The existing EIA system needs stronger follow-up mechanisms during project implementation to ensure that outlined measures are effectively executed.
- Enhanced stakeholder participation in the EIA process is recommended, necessitating capacity building within NGOs and optimized frameworks for stakeholder engagement.
- Capacity enhancement is required for governmental staff involved in EIA procedures, particularly in the technical committees responsible for review and those who monitor compliance and enforce stipulated conditions.
- Opportunities exist to align EIA practices more closely with high-priority topics, such as climate resilience and water security.

### **Risks and Gaps in the Existing Systems**

**Implementing organizations currently face a lack of environmental policies, regulations, strategies, Environmental and Social Management Systems (ESMS), and the necessary resources or capacity to leverage environmental benefits and mitigate risks associated with the program.** These organizations rely on the national legislative and institutional frameworks to address E&S issues, risks and impacts through its operation.

**Jordan's legislative framework and implementation practices for managing social risks have evolved, increasingly aligning with international standards. Nonetheless, several critical areas require further enhancement** to strengthen legislation, policies, and institutional systems. Addressing these gaps, despite potential short-term costs, is expected to yield long-term developmental benefits by enhancing the country's resilience to climate change, resource shortages, demographic shifts, social trends, and economic fluctuations. These challenges disproportionately affect vulnerable groups and hinder government efforts to eliminate extreme poverty.

**Key Gaps identified in the system includes:**

1. **Gaps in Social Aspect Considerations within Jordan's Environmental Impact Assessment Regulations:** Jordan's Environmental Impact Assessment (EIA) regulations recognize the importance of social aspects in assessing the environmental impact of projects. However, there is a notable gap in the detailed guidance on social and economic impacts within these regulations.
  - **Social Aspects in EIA Regulations:** The EIA regulations do reference social aspects, particularly in relation to characterizing the baseline social environment and assessing risks related to human health.
  - **Baseline Characterization and Impact Assessment:** The regulations require baseline characterization of the social and economic environment, including aspects such as employment, demographics, social structures, land use, community services, cultural values, and archaeological heritage. They also require a description of social and economic impacts alongside environmental and cumulative impacts.
  - **Monitoring Program:** A monitoring program is required that tracks the health of workers and social impacts within the context of ecosystem services.
  - **Lack of Detailed Guidance:** The regulations lack detailed guidance on what constitutes social and economic impacts. Important concepts in social assessments, such as potential forms of exclusion or discrimination, disproportionate adverse impacts on disadvantaged and vulnerable groups, conflict, broader community impacts, access to services, impacts on land use, or restrictions on the use of natural resources, are not explicitly mentioned.
  - **Consultation Requirements:** Consultation requirements under the EIA law are limited to the scoping stages of high-risk category projects. There is no requirement for stakeholder engagement or consultations beyond the initial EIA Terms of Reference stage, and no requirement for draft or final EIAs to be disclosed or consulted upon. Additionally, there are no consultation requirements for moderate, limited, or low-risk projects at any stage.

- **Lack of Social Assessment for Non-Infrastructure Programs:** For investment programs or non-infrastructure service provision programs, such as health service provision or support to SMEs, and with exception to traditional social valued components addressed in the EIA system in Jordan, there is no requirement for the government to conduct a social assessment to understand needs and priorities or to consider barriers to accessing benefits, particularly for vulnerable groups.
2. **Legislative Gap in Addressing Environmental and Social Risks in Vocational Training:**  
The current legislative framework owned by the proposed Program implementing agencies lacks specific provisions for environmental and social risks and impacts assessment, mitigation, monitoring. These frameworks do not present a clear mandate for implementing agencies in addressing environmental and social risks associated with their operations, including vocational training. This gap presents an opportunity for legislative refinement, aiming to integrate sustainability principles within the vocational training sector, thereby fostering a balanced consideration of environmental, social, and economic factors.
3. **Critical Gaps in Environmental and Social Risk Management within Jordan's Education Sector**
- **The MoE legal and policy framework does not require strategic environmental and social assessments** for large-scale developments, leading to inconsistent assessment practices and missed opportunities for early integration of environmental and social considerations. Also, comprehensive procedures for environmental and social screening, assessment, management, monitoring, and reporting are absent, except when mandated by donor-funded or PPP projects.
  - The regulatory framework for EIA is robust, featuring well-defined procedures for key steps like screening and review. The process is user-friendly and adheres to specified timelines. Hence, the **existing EIA system needs stronger follow-up mechanisms during project implementation** to ensure that outlined measures are effectively executed.
  - **Opportunities exist to align EIA practices more closely with high-priority topics**, such as climate resilience, resources efficiency, pollution prevention and management, and water security. **Human Resource limitations:** Capacity enhancement is required for governmental staff involved in EIA procedures, particularly in the technical committees responsible for review and those who monitor compliance and enforce stipulated conditions. Also, there are no dedicated staff or departments within implementing agencies are allocated to managing social risks and impacts, and Social Impact Assessments (SIAs) are often outsourced to external parties under donor requirements. While the MoE

has commendably established the Crisis and Risk Management Division, there exists a gap in its current operational capacity and training.

- **Inconsistent Stakeholder Engagement and Inclusivity:** This is clear in project planning and implementation, with consultation requirements limited to high-risk projects and not adequately inclusive of all affected parties. Also, gender and vulnerability issues are not sufficiently addressed in the impact assessments, leading to incomplete project evaluations.

## Recommendations

**Measure: (PAP action 1):** Strengthening of the E&S capacities of the PMU/DCU by assigning qualified E&S staff (E&S Focal Point) to oversee the E&S aspects of program implementation and provide them with adequate training on E&S risk management and reporting as needed.

**Measure: (PAP action 2):** inclusion of the E&S requirements including environmental, health, and safety (EHS) measures, including a Code of Conduct (CoD) for workers in the standard bidding documents (SBDs) for school expansion and rehabilitation and refurbishment works of other facilities, and all other documents that are related to carrying out civil works.

**Measure (Verification- DLI 2):** The technical design specifications of the PPP model will make reference to the Quality Assurance System (QAS) to be developed under the program and any other applicable E&S requirements to be verified by the Program verification process.

**Measure (Verification DLI 6 & 7):** Institutionalizing environmental and social risk management within the new proposed structure of the future Ministry of Education and Human Resources (MEHR) structure.

**Measure: (Verification- DLI 1, 2, 4, 5, and 7):** Strengthening the capacities of the Crisis and Risk Management Section at MoE for managing social risk management (SRM) through technical assistance to be provided under the IPF Component of the program

**Measure: (POM action):** The MoE, under RA1 and RA2, must prepare, adopt and incorporate resources efficiency standards into the designs and tender documents of the planned construction/extension, additions, rehabilitation, maintenance, and modernization of schools, workshops, additional classrooms, etc. and for the purchase and use of supplies (furniture, equipment, tools, machinery, electronic devices, etc.) under the Program

## 4.2 Core Principle #2 - Natural Habitats and Physical Cultural Resources

***Program E&S management systems are designed to avoid, minimize, or mitigate adverse impacts on natural habitats and physical cultural resources resulting from the Program. Program activities that involve the significant conversion or degradation of critical natural habitats or critical physical, cultural heritage are not eligible for PforR financing.***

## **Institutional Setup and Regulatory Framework**

The Directorate of Nature Conservation, a subsidiary of the MoEnv, holds the regulatory responsibility for natural habitats and PAs. MoEnv has subcontracted the Royal Society for the Conservation of Nature (RSCN) to manage 10 of the existing 12 PAs, leaving the ASEZA in charge of the remaining two. Various organizations, such as RSCN, the Royal Botanic Garden, and Al Mawa for Nature and Conservation of the Princess Alia Foundation, collaboratively oversee the management of SCAs. It is a regulatory requirement for all PAs and SCAs to establish and execute management plans, the compliance of which is monitored by MoEnv.

## **Implementation Performance Assessment**

Administrative capabilities for overseeing PAs by the national system are considered sufficient. MoEnv's Directorate of Nature Conservation operates with a seven-member team, and RSCN has a substantial staff strength of around 240, which includes ASEZA, and other entities involved in SCAs' management. Hence, the implementing agencies are lacking the capacity and staff to address natural habitat and PAs related priorities by itself without the support of MoEnv, ASEZA and/or RSCN.

## **Risks and Gaps in the Existing Systems**

While the existing framework for habitat conservation is efficiently structured and aligned with Core Principle 2, there is an identified gap in the governance of natural areas that fall outside the perimeter of officially designated PAs. The program is not anticipated to cause risks and impacts on natural habitat, PAs and critical habitats, or to critical physical cultural resources. Therefore, there is no need for any additional measures.

## **Recommendations**

No further measure is needed.

## **4.3 Core Principle #3 - Protect Public and Worker Safety**

*Program E&S management systems are designed to protect public and worker safety against the potential risks associated with (a) the construction and/or operation of facilities or other operational practices under the Program; (b) exposure to toxic chemicals, hazardous wastes, and otherwise dangerous materials under the Program; and (c) reconstruction or rehabilitation of infrastructure located in areas prone to natural hazards.*

## **Institutional Setup and Regulatory Framework**

**Under Public Health Law No. 47 of 2008** (amended), the Ministry of Health (MoH) is the competent authority responsible for protecting the country's public health. MOH is empowered to issue licenses to healthcare facilities, conduct inspections of establishments, and implement preventive, control and remedial measures in cases of health risks, including the spread of diseases (epidemics, pandemics)

and vector-borne diseases). Additionally, the law, in addition to the OSH National Profile 2012, Safety in Workplaces (Your Guide to Safety) 2016, OSH Procedures in Construction Sites (Guideline for Contractors and Site Engineers in the Small Projects) 2019, and Guide for Labor Inspectors; Inspection in workplaces 2019– construction sector. Although the law and the regulations are in compliance with PforR to protect workers, but the level of implementation is weak due to the low capacity of the ministry of labor to monitor and inspect workplaces and the limited resources available at the ministry.

**Under the Environment Protection Law No. 6 of 2017**, the MoEnv is designated as the primary authority for environmental protection, including projects, operations and activities holding risk or causing impacts to public health and safety. This includes environmental pollution (including exposure to toxic chemicals, hazardous wastes, and otherwise dangerous materials); the construction and/or operation of facilities and infrastructure or other operational practices of businesses and economic activities, the reconstruction or rehabilitation of infrastructure including those located in areas prone to natural hazards, waste management, emissions to air and air quality, noise, impacts on natural resources, etc.

**The MoEnv is empowered to issue environmental licenses**, conduct inspections of establishments, and implement remedial measures in cases of significant pollution incidents to prevent causing impacts to public and environment health. More details are provided in the section above discussing Core Principle #1.

**Under ASEZ environmental regulations, Decree 21/2001**, and similar to the mandate and responsibility of MoENV, environmental clearance and licensing of business and investments are required to undergo environmental screening and EIA process noting anticipated environmental risks likely to affect the environment and public health. This decree also addresses other forms and causes of risks to public health and safety linked to environmental pollution (including exposure to toxic chemicals, hazardous wastes, and otherwise dangerous materials); the construction and/or operation of facilities and infrastructure, or other operational practices of businesses and economic activities, the reconstruction or rehabilitation of infrastructure including those located in areas prone to natural hazards, waste management, emissions, ambient air quality, noise, and the protection of natural habitats. ASEZA also operates environmental inspection, monitoring and audit as needed throughout its mandate area. More details are provided in the section above discussing Core Principle #1.

**Jordanian Labor Law No. 8 of 1996 and its Amendments also regulates the relationship between the employer and the employee. It defines the obligations of the employer to provide a safe work environment, adequate code of conduct and suitable welfare for employees.** The Ministry of Labor is mandated for Labor Law enforcement. Regulation of Establishing HSE Committee and Organization No. 7 of 1998 requests each establishment to formulate an HSE committee to govern the HSE performance of that establishment. Also, it defines the number and roles and responsibilities of the HSE organization based on the number of employees at the establishment. Regulation 42/1998: which regulates prevention and therapeutic medical care of workers. The regulation identifies the duties of employers for providing medical care for the workers to prevent and treat vocational diseases. Regulation 43/1998: which includes the required measures to protect workers from mechanical, electrical and chemical risks at workplace. Regulation 56/1998: which regulates the work of Labor Inspectors. The Regulation identifies the qualifications, duties and procedures for OHS inspectors.



**The Jordanian Labor Law protects women from discrimination during pregnancy and while on maternity leave.** Employers may not terminate women starting from the sixth month of pregnancy or during maternity leave. The labor law is not explicit regarding measures to prevent or address sexual harassment, intimidation, or exploitation in the workplace. It is also vital to ensure pay equity for male and females. However, the MoL has issued the Code of Conduct for Employers and Employees in the Workplace to be adopted by companies as part of their annual registration process and will be applied during the project implementation period. The Codes make explicit references to sexual harassment and gender-based discrimination and specify Grievance Redress Mechanisms in the instructions. The Code should be part of the workers' contracts package.

**Regarding safety of structures and fire safety precautions in buildings, the General Buildings Law 9/1993** provides the requirements for ensuring the structural stability of all types of constructions including different types of buildings, roads and bridges. The Law requires the establishment of a committee to prepare engineering codes for the design, construction, supervision, maintenance and operation of different structures to ensure public safety. The issues related to hazardous chemicals and wastes were previously addressed as part of the environmental and social assessment system.

#### **Workers and Community Health and Safety**

**In Jordan, multiple institutions manage social risks related to community health and safety.** The General Directorate of Civil Defense enforces building codes. The Ministry of Transport, with other entities, implements the Road Safety Strategic Plan. The Ministry of Health oversees public health, including food and water safety and medical regulations. The Ministry of Environment ensures environmental protection and emergency response with the Higher Council of Civil Defense. The Higher Council for the Rights of Persons with Disabilities supports accessibility standards. The National Council for Family Affairs and the Ministry of Social Development set and monitor family and social service standards. The Family Protection Department, under the Public Security Department, handles domestic violence cases, with NGOs and INGOs providing additional survivor services.

**There are several regulatory instruments and standards for building safety and environmental protection.** Several texts regulate the issuance of building permits, such as The Construction Law 7 of 1993, "Instructions of Codes Application at the Design, Implementation, Supervision, Maintenance & Operation Phases and Public Safety Works and all Engineering Works in Relation thereto of 2004" and Regulation 52 of 2020. These instruments also allow verification of project compliance with legislative and regulatory provisions related to urban planning. The main purpose of these building codes is to protect public health, safety, and general welfare as they relate to the construction and occupancy of buildings and structures.

**Traffic Law 49 of 2008 also provides traffic and transport management requirements.** The law covers the licensing of vehicles and drivers, insurance requirements, classification of vehicles and licenses, and traffic rules and regulations, including speed limits, penalties, and fines for violations. The law aims at improving road traffic safety, vehicle safety, and pedestrian safety. National regulation does not specifically require EIAs to develop traffic management plans and assess potential traffic and road safety.

**The Ministry of Transport, through the National Road Safety Team, has prepared the Road Safety Strategic Plan for the years 2019-2023.** This strategic plan aims to reduce annual deaths and severe injuries due to traffic accidents by 20 per cent in five years. The plan, which the Council approved of Ministers, revolves around developing legislation and strengthening oversight on driving vehicles; road and transport engineering and planning; vehicle safety; studies, information, and data on road safety; ambulance and rescue; awareness, education, and training, and management and coordination between the concerned authorities. There are currently no mandatory requirements for road safety assessment that would fulfill World Bank requirements.

**Law 20 of 2017 on the Rights of Persons with Disabilities provides the regulatory framework to ensure universal access to services and buildings.** The Law defines a person with disabilities to be “a person who has long-term physical, sensory, intellectual, mental, psychological or neurological impairment, which, as a result of interaction with other physical and behavioral barriers, may hinder performance by such person of one of the major life activities or hinder the independent exercise by such person of any right or basic freedom...”. The Disabilities Law expressly prohibits discrimination on the grounds of a disability, which is defined as being “every limitation, restriction, exclusion, nullification or denial either direct or indirect due to disability of any rights or freedoms stated in this Law or in any other law, and that constitutes discrimination based on disability and reluctance to provide reasonable accommodation contrary to the provisions of this Law.” This applies both to private and public sectors to rehabilitate their premises to accommodate the needs of persons with disabilities, with special emphasis on the health, employment, education, and transportation sectors.

### **Labor and Working Conditions including Child and Forced Labor**

**Jordan is a member of the International Labor Organization (ILO) and has ratified 26 ILO conventions,** including 7 of the 8 core conventions. Jordan has not ratified the Freedom of Association and Protection of the Right to Organize Convention, 1948 (No. 87).

**Overall, the national labor legislation is comprehensive and consistent with World Bank requirements.** The Jordanian labor conditions, occupational health and safety (OHS), work injuries and work-related illness are addressed in Law 8 of 1996, the Labor Law and its amendments apply to all employees and employers except civil servants, municipal service employees, domestic workers, and agriculture workers. Domestic worker conditions are covered under Regulations 90 of 2009 for Home Workers, Cooks, and Gardeners, and a new regulation for agricultural workers’ conditions has been issued in 2021. There are also several other legislations under the Ministry of Labor and under the Social Security Corporation (SSC) as well as standards of the Jordan Institution for Standards and Metrology that elaborate upon the Labor Code.

**The Labor Code and its amendments set 16 years as the minimum employment age,** except where children are employed as apprentices in light work. For hazardous work, the minimum age of employment is 18. The law limits working hours for such children to six hours per day, mandates one-hour breaks for every four consecutive working hours, and prohibits work after 8 p.m., on national or religious holidays, and on weekends. The law prohibits all of the worst forms of child labor. Jordan expanded the list of hazardous, tiring or health-jeopardizing tasks for young persons in the 2011

Ministerial Order Concerning Occupations that are Dangerous, Tiring, or Harmful to the Health of Youth. An employer employing under 18-year-olds has to request a copy of the birth certificate, a certificate of fitness to work issued by a Ministry of Health approved physician and written approval of employment of the juvenile's guardian. These documents must be kept in a file, along with particulars of the juvenile's identity, residence, job, wage and leaves. However, there are no penalties specified in the event of violation.

**Risks related to labor and working conditions are predominantly related to compliance and enforcement** – especially in the informal labor market – rather than the letter of the law. Jordan has been working with the ILO for several years to strengthen the enforcement of labor laws, and the government is making a substantial effort to ensure compliance.

**However, there are certain areas where the law is silent or inconsistent with World Bank requirements in relation to principles of non-discrimination. In particular:**

- **Non-discrimination (general and gender-based):** Labor law does not explicitly prohibit employment discrimination based on personal characteristics unrelated to inherent job requirements. There are no express provisions prohibiting gender-based discrimination in all aspects of employment (although maternity discrimination is prohibited, and a 2019 amendment to the Labor Law prohibited gender-based pay discrimination).
- **Non-discrimination (non-Jordanian workers):** Different minimum wage rates apply to Jordanian and non-Jordanian workers, although there are plans to align the minimum wage rate of migrant workers with that of Jordanians in 2023. Non-Jordanian workers may join trade unions but not establish new ones and, in some cases, are not permitted to vote on union matters.

**A number of key amendments have been made to the labor law in recent years.** These were aimed primarily at easing Syrian refugees' access to the labor market and strengthening gender equality in employment. The Agricultural Workers Bylaw adopted in 2021 (and accompanied by sector-specific Inspection Instructions and Instructions for Occupational Safety and Health) also served to extend many of the provisions of the Labor Law and Social Security Law to workers in the agriculture sector on paper, although it is still considered early days in terms of putting these laws into implementation. Given significant recent amendments to Jordan's regulatory framework, further reform is not thought to be on the immediate horizon. Other key developments related to labor law are as follows:

- **Child labor: The Jordanian government adopted a new National Strategy to Eliminate Child Labor in June 2022** and approved a corresponding action plan. The Strategy outlines the responsibilities of all bodies in relation to child labor. In addition, the National Framework for Child Labor and Beggary was updated in 2021.
- **Informal workers and social security:** According to the Ministry of Social Development, a study exploring extending social security coverage to informal sector workers is underway.
- **Internal company bylaws:** In August 2022, the Ministry of Labor, in collaboration with USAID's Women's Economic and Leadership Empowerment Activity, developed Model Guiding Internal Bylaws for businesses operating in Jordan's private sector. As of September 2022, 213

Jordanian companies have adopted internal bylaws (regulations) based on the Model, and the Ministry is now working with the USAID Governance Program to automate procedures for ratifying company bylaws.

- **Occupational Health and Safety (OHS):** The Ministry of Labor has identified a need to revise OHS legislation, including bylaws and sector-specific guidelines, in order to better align with international OHS directives such as the Occupational Safety and Health Convention (C155) (not currently ratified by Jordan). Regulations relevant to occupational health and safety were reviewed, and work is now underway to adopt a number of newly drafted bylaws. The Ministry is also working to develop a national system for occupational health and safety linking relevant stakeholders to gather data on accredited OHS supervisors and medical staff working within companies.
- **Workplace sexual harassment:** An amendment to the Labor Law was passed in March 2023, prohibiting and imposing fines for sexual assault or sexual harassment in the workplace. The amendment is seen as a positive step, though the definition of sexual harassment in the law and the legal recourse for victims remain vague. The government is also considering adoption of two Sectoral Codes of Conduct that relate to sexual harassment in the workplace: One for the private sector, and one for the transport sector. The codes are expected to phase in over
- **Non-discrimination (general and gender-based):** Labor law does not contain an explicit general prohibition of employment discrimination on the basis of personal characteristics unrelated to inherent job requirements. There are no express provisions prohibiting gender-based discrimination in all aspects of employment (although maternity discrimination is prohibited and a 2019 amendment to the Labor Law prohibited gender-based pay discrimination).
- **Non-discrimination (non-Jordanian workers):** Differential minimum wage rates apply to Jordanian and non-Jordanian workers, although there are plans to align the minimum wage rate of migrant workers with that of Jordanians in 2023. Non-Jordanian workers may join trade unions, but not establish new ones and in some cases are not permitted to vote on union matters.

## Implementation Performance Assessment

### Workers and Community Health and Safety:

**Occupational health and safety risks and impacts associated with the construction activities of impact site workers, students, teachers, and local communities adjacent to the project sites.** During construction, these include exposure to dust, noise, fumes, demolition/construction waste, hazardous chemicals, traffic safety, and injuries/ potential fatalities due to accidents during construction activities among others.

**Since the program is focused on school extensions on existing school properties and expansion of TVET centers, there are also safety risks for children from falls or injuries on a work site,** requiring high levels of supervision of contractors and good construction practices. Children may also be exposed to risks of verbal harassment or exploitation from proximity to work crews. The geographically dispersed nature of the works and the low capacity of MOE to supervise construction contributes to elevated risks of community health and safety associated with the program. Appropriate mitigation

measures such as Codes of Conduct and improved MOE supervision regime against contractual requirements.

**Jordan's road safety shows a higher rate of road deaths compared to industrial countries**, with enforcement of drunk driving laws rated low but better for speed limits and seatbelt use. Industrial sites and landfills pose environmental health risks, with insufficient strategies to address pollution's impact on health. Gaps in emergency preparedness regulations exist, and there is lack of community engagement in emergency plans. Despite legal requirements for accessibility, funding for disability rights is inadequate, affecting public places and transport accessibility. Gender-based violence is prevalent and underreported, with societal stigma and norms contributing to the issue, although public opinion largely supports criminalizing domestic violence.

### **Child and Forced Labor**

**Child labor significantly contributes to school dropouts, especially among boys**, compounded by factors such as ill-treatment by teachers, illiteracy, and disinterest in education, with poverty and adult unemployment closely linked to this issue. Jordan stands at the forefront of countries ratifying international conventions aimed at shielding children from economic exploitation, including the Convention on the Rights of the Child and its two protocols, alongside the International Labor Organization's conventions (Minimum Age Convention No. 138 and the Worst Forms of Child Labor Convention No. 182). The country's legislation against child labor aligns with these international standards. A 2016 survey conducted by the Department of General Statistics and the Center for Strategic Studies at the University of Jordan revealed Jordan's child population (ages 5-17) to be 4,030,384<sup>2</sup>, with 69,661 of these children engaged in labor, and 44,917 of them working in hazardous conditions. Thus, child labor accounts for 1.89% of the total national population, including Syrian refugee children. Of the total working child population, 91.7% are involved in child labor. Alarming, 71% of children aged 15-17 are engaged in or at risk of engaging in dangerous jobs or facing hazardous work conditions.

**In recent years, Jordan has taken important steps to strengthen its policy response on child labor.** The Child Labor Unit was established the National Committee for Child Labor (NCCL), in 2011, the Jordanian Prime Minister also agreed in the Ministry of Labor, which she also chairs the National Framework for Combating Child Labor (NFCCL), which was supported by the International Labor Organization. This framework was designed to integrate efforts to combat child labor between the Ministries of Labor, Education, and Social Development and to effectively address the identification and referral of labor Children in Jordan.

**The Department of Child Labor and Institutional Nurseries within the Ministry of Labor is actively engaged in formulating and executing strategies to address child labor.** This includes developing annual plans, setting performance indicators, and managing an electronic system to oversee the national strategy against child labor. The department reviews and updates child labor legislation, collaborates with various stakeholders to strengthen efforts against child labor, and enhances the skills

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<sup>2</sup> Ministry of Labor ([www.mol.gov.jo](http://www.mol.gov.jo))

of labor inspectors for effective law enforcement. It also conducts research, maintains electronic systems for data management, and focuses on continuously improving practices. Additionally, the department processes complaints related to child labor, as evidenced by the 11 complaints received in the first two months of 2024, ensuring each case is thoroughly investigated and addressed.

**The national labor inspectorate under the Ministry of Labor is responsible for enforcing labor law.**

The Ministry of Labor currently conducts four different types of inspections: 1) primary inspections of new enterprises 2) “proactive” inspections 3) follow-up inspections based on major non-compliance, and 4) inspections based on complaints. Observers have previously stated that the inspectorate’s enforcement capacity is hindered by knowledge gaps, insufficient training, and limited up-to-date communication of regulatory changes and the implementation/monitoring requirements in practice (e.g. latest COVID-19 guidance, recently introduced provisions on gender-based pay discrimination, flexible work permits for Syrian refugees). In addition, the Ministry of Labor may have insufficient numbers of inspectors to identify and investigate non-compliance with all aspects of the law; reported focus is on validity of work permits and social security registration.

**The authorities have taken a number of measures to strengthen the labor inspection system.** In 2020, the ILO and The Ministry of Labor signed a memorandum of understanding that laid out three key recommendations, including for the Ministry of Labor to carry out an assessment of labor inspectors’ skills gaps, introduce targeted training, and upgrade the Ministry’s electronic system to support more efficient inspection. Work to upgrade the e-inspection system is currently underway. To build The Ministry of Labor’s capacity, several organizations have trained The Ministry of Labor staff, including the ILO (including Better Work Jordan-BWJ), UNHCR, USAID, DFID, and IFC. Specialized training plans and programs, such as on occupational health and safety and targeted training on labor dispute mediation, have been introduced to strengthen the capacity of the inspectorate.

**Nonetheless, the need for further capacity building at The Ministry of Labor is still great.** Key areas identified for capacity building include: (i) knowledge and professional competencies of labor inspectors on compliance criteria, using systems, compliance-based inspections etc. and (ii) IT capacity to conduct risk-based inspections and improve documentation and follow-up. These capacity needs are being supported by ILO comprehensive technical assistance program. The World Bank supported Economic Opportunities for Jordanians and Syrian Refugees Program for Results include measures that are designed to align with ILO’s support and reinforce improved The Ministry of Labor performance results in these key areas (for example, conducting risk-based inspections, inspection manuals and procedures, and enhanced IT systems).

**Some data suggests that the Ministry of Labor could also use additional inspectors;** however, this may not be a first priority in improving The Ministry of Labor capacity.<sup>3</sup> In 2019, The Ministry of Labor indicated they conducted about 50,000 inspections across Jordan. In 2018, the number of inspectors was 135, down from 200 in 2017, and a number that may be insufficient for the size of Jordan’s workforce, which includes more than 2.295million workers<sup>4</sup> (ILO’s technical advice is a ratio approaching 1 inspector for every 15,000 workers in developing economies, so Jordan would employ

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<sup>3</sup> Ergon. Jordan ESS2 Briefing Report. 2022.

<sup>4</sup> US State Department. *2018 Findings on the Worst Forms of Child Labor*. 2018.

about 153 inspectors). The Ministry of Labor includes OHS Division that is responsible of conducting related inspections. The Division includes only 18 OHS inspectors that cover the whole country.

**In 2020, the Ministry of Labor launched the Hemayah online platform – which allows workers (including non-Jordanians) to submit anonymous complaints related to employment matters**, such as non-payment of wages, instances of suspected child labor, and other issues. The platform is available in English and Arabic and has reportedly received more than 60,000 complaints in the past two years. According to the Ministry of Labor, work is currently underway to make the platform accessible in 10 different languages and to open it for domestic workers to use. In addition, embassies and diplomatic missions will be allowed to submit complaints on behalf of domestic workers of their nationality.<sup>5</sup>

**Overall, some unique contextual factors and challenges frame national labor legislation and its implementation in Jordan.** Principally, these are low labor force participation, particularly among women, high levels of unemployment, especially among youth, and insufficient job creation. Jordan must create 57,000 new jobs annually to absorb current labor market entrants. The structural dependency of the Jordanian economy on foreign aid and remittances renders it vulnerable to external shocks – including political and economic changes in the region and COVID-19.

### **Risks and Gaps in the Existing Systems**

**Below is a summary of notable labor risks and implementation challenges in Jordan:**

- **Terms and conditions of employment (including wages and social security):** Non-compliance with the law regarding contracts, wages, and hours is reportedly common, especially among migrant workers and refugees in the construction, manufacturing, and agriculture sectors. Most agricultural workers are reportedly paid below the minimum wage. The risk is highest in informal and smaller workplaces. Employers may not comply with social security requirements and may repeatedly hire workers for fewer than 16 days per month to avoid paying social security.
- **Child labor:** Child labor is a high-risk and increasingly prevalent issue in Jordan, as well as a priority concern for the authorities. Over 70,000 children were estimated to be working under conditions of child labor in 2016, with as many as 32% engaged in hazardous work. Estimates from 2021, however, indicate that cases of child labor have doubled since. Syrian refugee children are particularly vulnerable to child labor (including hazardous child labor) in construction, manufacturing, and primary agriculture – more frequently occurring in smaller workplaces and informal labor contexts. Child labor risks have been exacerbated both by school closures and increased economic hardship as a result of the COVID-19 pandemic.
- **Informality:** Informality rates in Jordan are high, comprising 46% and 52% of total employment. Informal recruitment and employment practices may give rise to risks related to poor working conditions, compounding vulnerability faced by refugee and migrant workers – many of whom work informally despite the introduction of flexible work permits for foreign workers in the construction and agriculture sectors and the lowering of permit fees. Workers on World Bank

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<sup>5</sup> Ergon. Jordan ESS2 Briefing Report. 2022.

projects may be informal workers lacking social security coverage, in workplaces with high rates of non-compliance with labor legislation, impeding aligning with World Bank requirements.

- **Contractor / sub-contractor management:** In the construction sector, monitoring and ensuring compliance with labor standards is difficult due to weak industry practices related to contractor management and sub-contractor oversight; some contractors reportedly overlook violations by sub-contractors. There may be issues ensuring that workers receive adequate working conditions, training and equipment to (sub-)contracted workers. Jordan does not require contractors to require a Code of Conduct that would be consistent with World Bank Guidance<sup>6</sup>. Although all recruitment agencies must be licensed, informal recruitment practices could give rise to risks of forced labor, particularly for migrant workers.
- **Labor administration and inspection capacity:** Observers have stated that the labor inspectorate lacks the capacity and sufficient training to monitor compliance with labor law, particularly in relation to newly introduced provisions. However, the authorities report that efforts to enhance inspection and dispute resolution capacity are underway. The lack of statutory requirements for workplace-level grievance mechanisms and the difficulties of pursuing individual dispute resolution through the courts create additional pressure for the Ministry of Labor, which has recently launched an online complaints platform. Challenges related to inspection capacity and complaints processes may create an environment where labor law is not effectively enforced, affecting the implementation of World Bank projects.
- **Workers' organisations:** There are a number of restrictions on freedom of association in Jordan, particularly for civil servants, who are not permitted to join or form unions, and migrant workers, who may join unions but not establish new ones. The law does not provide for forming independent trade unions outside the umbrella of the National Trade Union Federation, and observers have raised concerns over anti-union discrimination and interference in union activity.

**Pertaining to the analysis conducted, the following outlines the risks and gaps identified within the system:**

- While the legislation is in line with the Bank's requirements, in practice, informal workers, migrant workers, refugee workers or other vulnerable workers work under uncertain working terms and conditions.
- National legislation has overall OHS provisions (though not sector specific provisions). In practice, enforcement of OHS provisions, especially in the construction and agriculture sectors, is limited.
- There are no legal gaps between World Bank requirements and the national legislation. In practice, child labor is a risk in the country.
- National law is consistent with World Bank requirements; however, there is a risk of forced labor in project implementation.
- There is an operational and accessible national worker grievance system operated by MOL. There are no statutory requirements for workplace-level structures that can contribute to more effective resolution of worker grievances at the level closest to where they occur.
- There is no requirement for contractors or subcontractors to have labor management procedures in place.

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<sup>6</sup> World Bank Good Practice Note. Addressing Sexual Exploitation and Abuse and Sexual Harassment (SEA/SH) in Investment Project Financing involving Major Civil Works. 2020



## Recommendations

**Measure (PAP action 3):** Initiate policy dialogue with the Ministry of Labor (MoL) and the Ministry of Social Development (MoSD) to prepare an action plan to address child labor risk.

**Measure: (PAP action 4):** inclusion of the E&S requirements comprising environmental, health, and safety (EHS) measures, including a Code of Conduct (CoC) for workers in the standard bidding documents (SBDs) for school expansion and rehabilitation and refurbishment works of other facilities, and all other documents that are related to carrying out civil works.

**Measure: (PAP action 5):** Incorporation of OHS, public health and safety, environmental and social safeguarding and sustainability, and climate change and action topics in the vocational training curricula and training materials, and in counselling and career guidance.

#### 4.4 Core Principle #4 - Land Acquisition and Loss of Access to Natural Resources

*Program E&S systems manage land acquisition and loss of access to natural resources in a way that avoids or minimizes displacement and assists affected people in improving, or at the minimum restoring, their livelihoods and living standards.*

##### **Institutional Setup and Regulatory Framework**

Land acquisition in Jordan is governed by Real Estate Law No. 13 of 2019, which replaced previous laws including Land Acquisition Law No.12 of 1987. This legislation was enacted with the objective of establishing a consistent legal infrastructure for the real estate industry, which accounts for 60% of the nation's fixed assets and has a significant influence on the economy. The new law is designed to yield economic and social advantages not contemplated by earlier laws, including the promotion of investment within the real estate sector. Notably, the new law introduces clear timelines for the execution of the land acquisition process and streamlines the procedure for compensating affected parties.

**Articles 3178 and 9180 of the Real Estate Law (REL) outline the primary conditions for land expropriation:**

- Article 3178 mandates that land can only be expropriated for public benefit and requires fair and equitable compensation for any Project Affected Peoples (PAPs).
- Article 9180 emphasizes the preference for direct purchase or property exchange with the owner as the initial approach for land acquisition. If direct purchase proves unfeasible and the project's public interest necessitates a specific asset, then the expropriation process may commence. The REL categorizes real estate as follows:
  - Owned Real Estate: Property legally owned and utilized by the owner(s).
  - Suspended Real Estate: Property withheld from use by the owner(s), deemed as donated for charitable purposes.
  - Abandoned Real Estate: Government-owned land that is unused and available for public or specific group utilization.
  - Mawat (Dead) Real Estate: Unregistered government land, distant from urban areas, unoccupied, uncultivated, and not designated for public or group use.
  - Tribal lands: As per Article 42, any historically tribe-utilized abandoned land should be registered as government property. Operations may impact land from any of these categories.

**Article 178 of the Real Estate Law (REL) mandates that owners be compensated at full replacement cost for their properties, including buildings, improvements, and trees.** Also, Article 190 lays out the principles for determining fair compensation:

- The compensation value should reflect the property's market value at the time the land acquisition decision is made, following established real estate valuation practices.

- Fair compensation for land acquisition (LA) cases is based on the value of previous transactions for the property in question or similar properties in the vicinity, according to records at the Department of Land Survey (DLS).
- For right-of-way (RoW) cases, compensation is deemed fair if it matches the reduction in property value due to the RoW.
- Renters of LA or RoW properties are fairly compensated if the amount does not exceed 15% of the total compensation for commercial or industrial purposes, or 8% for other uses, taking into account the rental agreement's duration and expiration date.
- The compensation evaluation does not account for any post-LA decision property improvements, new rental or investment contracts, or market value fluctuations resulting from the LA process.
- Compensation for damages incurred outside the acquired land by the Acquirer can be determined by the Minister of Finance, based on a recommendation from the DLS Manager and the damage compensation committee's report.
- Article 191 allows government acquirers to provide PAPs with tangible compensation by granting rights to government-owned property, which the PAPs can fully use or utilize.
- Prior to compensation, landowners are responsible for any outstanding property taxes.
- The compensation agreement must be validated by the Land Directorate and authenticated by the Cabinet, with the compensation paid directly to the landowner or deposited in the Treasury under the beneficiary's name within three months.
- If compensation is not paid within the three-month period, an annual interest of 9% accrues from the day following the deadline until payment is made to the landowner. The law outlines a transparent land acquisition process and delineates the responsibilities of all involved parties.

**The law also specifies a clear and transparent procedure for land acquisition, clearly defining the roles and responsibilities of all parties involved.** It details the sequential steps required for the acquisition of land, including:

- The Acquirer must publicize their intent to acquire land or a right-of-way (RoW) in two newspapers. Two weeks later, the Acquirer should seek Cabinet approval for the proposed acquisition.
- Within 90 days of the newspaper announcement, the Acquirer must request a land acquisition (LA) decision from the Cabinet, providing land details, the acquisition rationale, a preliminary compensation estimate, and evidence of financial capacity to pay.
- If the Acquirer fails to apply within two weeks, the announcement remains effective.
- The Cabinet, after verifying the LA justification and the Acquirer's financial readiness, should issue the LA decision within 180 days of the announcement.
- The LA decision must be published in the national gazette to take effect.
- If no decision is issued within 180 days, the announcement becomes void.
- Upon LA decision issuance, the Acquirer must inform the DLS Manager to annotate the land registration, halting all actions except for inheritance transfers or legal heirs' share sales, which require Acquirer approval after compensation is determined.
- The Acquirer must identify land users if the land is unregistered at DLS and lacks a legal owner.

- An internal committee must be formed by the Acquirer to assess the land and estimate compensation as per the law.
- The law recognizes registered landowners in the DLS database as owners. If there's no registration, occupants or users are deemed owners.
- If there are other stakeholders, like renters, the owner must inform the Acquirer in writing within 30 days of the newspaper announcement. Stakeholders may also notify the Acquirer within the same timeframe.

**Additionally, the law specifies the process for Negotiation for Compensation**, detailing the steps and considerations involved in this phase:

- The entity seeking to acquire property is required to publish an invitation for compensation negotiations in two newspapers, directing the property owner to initiate contact with the acquiring entity within 30 days to discuss compensation. This announcement should detail the Land Acquisition (LA) decision made by the Cabinet.
- If the acquiring entity and the property owner agree on the compensation, they must prepare a written agreement, signed by both parties, which becomes effective upon the approval of the Minister of Finance.
- If no agreement is reached, both the acquiring entity and the property owner have the right to seek a legal determination of fair compensation. The court must resolve these disputes within a year, and the court-determined compensation is considered final and binding.

**The law includes clear stipulations regarding Compensation Payment**, setting out the necessary procedures and methods for disbursing compensation to affected parties.

- The acquiring entity must deposit the compensation amount into a special fund at the Directorate of Land Survey (DLS) under the property owner's name. Suppose the owner does not claim or receive the compensation for any reason. In that case, the acquiring entity must place a second announcement in two newspapers, instructing the owner to contact the DLS to collect their compensation.
- Should the compensation not be deposited by the acquiring entity or claimed by the property owner within 30 days following the newspaper announcements, the funds will remain in the special fund account. They will be subject to an annual interest rate of 5%.
- The owner must clear any outstanding taxes or financial obligations on the land before receiving compensation. If the owner is unable or unwilling to pay these taxes, the equivalent amount will be deducted from the compensation value.
- The compensation value is not subject to any fees or taxes.
- The DLS manager must inform the Acquirer to take possession of the land before the owner is compensated.
- If the DLS director identifies a miscalculation in the land area that affects the owner, the Acquirer must be notified and the issue must be publicized. Additional compensation is required if the actual area is larger than what was paid for; if smaller, the owner must refund the excess to the Acquirer.

**The law also discusses the Ownership Transfer Conditions as follow:**

- Completion of Compensation: Ownership transfer to the Acquirer is contingent upon the payment of compensation to the owner.
- Rights of Way (RoW): Ownership of land designated for RoW does not transfer to the Acquirer and remains with the owner.
- Cabinet's Preemptive Decision: If the Cabinet of Ministers, based on the Acquirer's request and justified reasoning, decides that the Acquirer should take possession of the land before completing negotiations or compensation payment, the Cabinet's decision is final and enforceable.

**Furthermore, the law addresses the conditions under which Land Acquisition may be cancelled,** providing a framework for reversing the acquisition process under specified circumstances. The discussion includes:

- Prohibition on Relinquishing Acquired Land: The Acquirer is not permitted to forfeit ownership of the acquired land (or cancel the LA) or any part of it after taking possession and making alterations, unless the original owner agrees and both parties' consent to the terms of LA cancellation.
- Cabinet's Cancellation Authority: The Cabinet of Ministers may, upon the Acquirer's request, cancel the LA for the entire land or a portion thereof within a five-year period from the LA decision date, leaving the Acquirer with no subsequent rights to the land.
- Repayment of Compensation: The original owner is required to return the compensation received if the LA is canceled. If the original owner refuses, the compensation value is legally reverted to the Acquirer.
- Right to Compensation for Damages: The original owner may claim compensation for any damages or adverse effects resulting from the land acquisition and its cancellation.
- Inaction on Project Development: If the Acquirer does not commence the project for which the land was acquired within ten years from the date of ownership transfer, the original owner has the right to seek restoration of land ownership through the courts.
- Court Assessment of Damages: The court, upon the original owner's request, will determine the compensation for damages and impact sustained from the LA decision date to the court's decision to revert land ownership.
- Refund of Compensation with Interest: Once the court decides to restore the land to the original owner, they are obliged to repay the compensation received from the Acquirer, including any annual interest as defined by law (5%).
- Additional Tax on Ownership Reversion: In the event of land ownership reverting to the original owner, and at their request, an additional tax similar to those stipulated in the law may be imposed.

**Direct Purchasing Regulation No. 41 of 2020:**

**Another pertinent piece of legislation is Direct Purchasing Regulation No. 41 of 2020, which guides the government's process for the direct acquisition of land.** The regulation is enacted under Article 180(b) and Article 191(b) of the Real Estate Property Law No. (13) of 2019. This regulation, which came into effect upon its publication in the Official Gazette, establishes the following:

- **Article 1:** This regulation is referred to as the "Direct Purchase or Exchange of Real Estate by Authorized Expropriating Entities (2020)". It is effective from the date it is published in the Official Gazette.
- **Article 2:** Defines the terms used within the regulation, such as "Law," "Ministry," "Minister," "Competent Minister," "Government," "Department," "Director," "Ownership," "Project," "Central Committee," "Technical Committee," and "Subcommittee," each with a specific meaning pertinent to the context of real estate transactions.
- **Article 3:** Describes the methods for the direct purchase or exchange of real estate, which include direct purchase and ownership, property exchange, and financial leasing with an option for ownership.
- **Article 4:** Details the prerequisites for entities wishing to acquire property, including the need for expedited procedures, the possibility of cash or in-kind compensation, and the estimation of property values for compensation purposes. It also addresses situations where agreement on property value is impossible, necessitating expropriation procedures under the Real Estate Property Law.
- **Article 5:** Discusses compensation for property ownership, including in-kind compensation options, the requirement for the alternative property to be free of encumbrances, and the valuation equivalence between the expropriated and alternative properties.
- **Article 6:** Allows for direct property ownership without standard purchasing procedures if the project's nature requires immediate acquisition, as per Article 204 of the law.
- **Article 7:** Establishes a Central Committee for direct real estate purchases, detailing its composition, responsibilities, and decision-making process.
- **Article 8:** Describes the formation and responsibilities of the Technical Committee, which reviews recommendations from subcommittees and submits them to the Central Committee.
- **Article 9:** Creates a Subcommittee for real estate purchases in each governorate, outlining its responsibilities and the process for estimating property values.
- **Article 10:** Sets forth procedures for automatic purchase, exchange, or acquisition of real estate, including verifying the need for the property, the availability of resources, and the property's suitability for the project.
- **Article 11:** Ensures the fairness of purchase or exchange transactions by requiring bidding processes, while Article 12 allows for alternative property acquisition methods, such as soliciting offers or direct negotiation, in specific circumstances.
- **Article 12:** Despite the stipulations of Article (11), the competent minister is allowed to authorize property purchases based on the Central Committee's recommendation through one of two methods:
  - A. Soliciting offers under two specific conditions:
    - When there is an urgent and immediate need for the property, making the tender process impractical due to time constraints.
    - When less than three alternative properties are available and the committee determines that necessity dictates the purchase.
  - B. Direct negotiation with property owners in any of the following scenarios:
    - When an emergency situation necessitates the purchase and precludes the normal procedures for bidding or soliciting offers.
    - When no suitable alternatives to the property are found despite repeated announcements.

- When bids or offers have been solicited but fail to yield a suitable offer.
- **Article 13-A-(1):** The Minister is responsible for signing the final finance lease contracts for entities that are part of the government, ministries, public administration departments, municipalities, or the Amman Municipality. (2) The manager is charged with signing contracts for direct purchase or exchange of property if the acquiring entity is the government or one of its ministries, institutions, public departments, or municipalities. (3) If the acquiring entity is not part of the government, ministries, public service departments, or municipalities, the entity desiring property ownership will appoint a signatory for the contracts as outlined in points (1) and (2) of this section.
- **Article 13-B:** Contracts described in paragraph (A) can only be signed when the necessary financial allocations are available.
- **Article 14:** The Real Estate Purchase System for the Government No. (68) of 2014 is hereby annulled.
- **Article 15:** The Minister will issue the necessary instructions to implement the provisions of this regulation.

**The issuance of this Regulation is expected to have several benefits for the ministry in processing transactions related to land acquisition, including:**

- It outlines various methods for acquiring real estate, including direct purchase, exchange, and financial leasing with an option for ownership, offering flexibility to suit different circumstances.
- It discusses fair compensation for property owners, including in-kind compensation options, and requires that alternative properties be free of encumbrances.
- Initiation of the land acquisition process through directly negotiating the price for the land with the owner until an agreement is reached.
- It establishes a Central Committee and Technical Committee to oversee and manage the direct purchase or exchange processes with local committees created in each governorate to handle local real estate transactions, ensuring that local considerations are considered.
- Bypassing legal disputes by engaging in direct discussions with the property owner, conserving the ministry's finite fiscal assets.

**The Land Acquisition Division at the MoE**, situated within the Assets and Investment Directorate of the Buildings and International Projects Department, oversees all land acquisition activities for the 42 Education Directorates throughout the kingdom. The Real Estate Law delineates the duties of the entities involved in land acquisition, with the Cabinet's approval required for any land expropriation. In the context of public benefit projects, there is an obligation to offer just compensation, and it is imperative to demonstrate that sufficient funds are available to cover all compensation payments associated with the project's land acquisition needs.

**After Cabinet approval, a valuation committee is established to estimate fair compensation for expropriated lands and properties.** This committee comprises the district representatives of the Ministries represented on the acquisition committee, namely the Ministry of Public Works and Housing, the Department of Lands and Survey, the Ministry of Finance, the Ministry of Agriculture, and the Auditing Bureau. Valuation steps include a demonstration of public benefit from the project

concerned, assessment of replacement values of confiscated land, and establishment of compensation rates for all assets to be confiscated. Valuations are based on current land values and prices. The valuation committee is comprised of relevant government staff selected by the Director of Lands and Survey. The Director can also call upon external technical advice in a review of valuation and compensation if necessary.

**After the valuation committee establishes proposed compensation amounts, the committee announces the details of the land acquisition profile, including compensation cost and publishes them in the official magazine.** Affected persons will have 30 days to discuss the offered compensation with the concerned authorities and the valuation committee. Owners have the right to object and appeal against the amount offered to them. Once this period has passed, direct negotiation between landowners and the relevant purchasing party takes place to allow for an agreement on a fair and just level of compensation for any confiscated land. If the parties reach a negotiated agreement, the project will ensure compensation is paid to affected persons or placed under bank accounts in their names. If no agreement is reached, the owners have recourse to the courts. After ministerial approval, the valuation report is forwarded to the Director of Lands and Survey for payment. The funds are drawn from the budget allocations of the specific agency requesting the land acquisition.

### **Implementation Performance Assessment**

**The proposed program is set to** finance the expansion of kindergarten classrooms within current schools, as well as the refurbishment, rehabilitation, extension, and maintenance of existing TVET facilities. The Program will not support the construction of new educational buildings or other structures due to the potential negative consequences of land acquisition on individuals affected by the project. The majority of the physical works and related environmental, health, safety, and land risks are associated with Result Areas 1 and 2. The construction of new schools or other facilities is not included in the program, limiting land-related risks to school expansions.

**The current mechanisms for managing land acquisition were examined for consistency with the core principles of the World Bank's OP/BP 9.00.** The analysis found that the MOE has significant experience implementing donor projects and has done so with very high quality. Nevertheless, existing MOE systems were deemed insufficient in addressing risks related to land acquisition, as underscored in this review.

**The MOE has been using various strategies to reduce land acquisition, as land is costly.** These strategies include double shifting, increasing class sizes, and leasing buildings. When land is required, the preference is to use government land or exchange land between ministries, making land acquisition a last resort. Nonetheless, expansions occasionally necessitate the acquisition of adjacent land parcels. When expansions occur solely on public land, without the need for private land acquisition, there may be infrequent impacts on informal land users, which are reportedly avoided. Voluntary Land Donation is sometimes practiced in accordance with customary and national procedures. Consequently, land acquisition remains a continuous social risk of the program, albeit potentially less than initially anticipated under the ongoing PforR.



**Land acquisition is minimized by constructing on existing MOE lands wherever possible**, and the MOE also uses other strategies to increasing enrollment (e.g. increase class size), but school expansions in some cases entail swapping of land between ministries, or acquiring adjacent parcels from private landowners on a willing-buyer willing seller basis. There are also risks related to informal land users which are not recognized under Jordanian Land Law, even when constructing on MOE lands.

**The MOE has augmented its capacity in the area of land management over the past years**; the department has additional officers and GIS capabilities. Environment, and occupational health and safety provisions are not always adequately observed, particularly during construction activities. Therefore, more capacity building is needed to enhance the MOE E&S safeguards performance and reporting including OHS training, EHS incidents/accident reporting. It is noted that USAID's Enhanced School Management Program (ESMP) is running concurrently and is expected to significantly assist in improving the school planning and overall construction management functions, including environmental, health and safety and overall quality. Other international donors are active in school construction and together with NGO's are supporting MOE in areas of gender and school climate and many other areas.

**The ESMP has been actively collaborating with the land acquisition department to increase land availability for School Infrastructure Projects.** This partnership encompasses various initiatives such as land surveys for approximately 750 locations, the development of a land acquisition plan as part of the School Infrastructure Operational Plan (SIOP), the execution of agreements for the exchange of registration information and geodata, and the enhancement of collaboration with governmental entities like the Department of Land and Survey (DLS) and the Ministry of Public Works and Housing (MPWH).

**The ESMP and the Land Acquisition Section have jointly developed Land Acquisition and Management SOPs**, capturing the legal framework related to land acquisition and process improvements, including treasury land reallocation, direct land purchasing, and payment of land dues. These SOPs were officially submitted for approval on December 6, 2023, following endorsement by the Buildings and International Projects Director.

**Following the recommendation under the previous Environmental and Social Systems Assessment (ESSA) for the ongoing Program-for-Results (PforR)**, the Ministry of Education (MoE) initiated consultancy services to assess the land acquisition impacts and procedures for all school expansions under the program, in accordance with World Bank E&S Core Principles. The technical assistance includes the creation of Standard Operating Procedures (SOPs) to avoid Category A-type subprojects, reduce involuntary resettlement where feasible, and manage resettlement when necessary. These SOPs will detail the criteria, principles, processes, and procedures for various land acquisition scenarios, aligning with World Bank requirements, the Land Acquisition Law, and international best practices. It is also important to note that loss of access to natural resources is not anticipated to occur as a result of the proposed Program or any of its activities.

The consultant is also working in tandem with the USAID-supported Enhanced School Management Program (ESMP) to ensure that efforts and outcomes are complementary, and the SOPs developed by

ESMP are aligned to with World Bank and OP 9.00 requirements. The work of the consultant is expected to be completed by June 2024.

**Additionally, the MoE started utilizing the new Direct Purchasing bylaw for land acquisition to build new schools.** This new regulation has been applied to acquire two land parcels so far. The ongoing consultancy, supported by the Bank, is also examining the effectiveness of this new bylaw in reducing land purchase costs, preventing legal disputes, ensuring fair compensation for landowners, and achieving cost savings for the ministry.

**The land acquisition process in Jordan presents several challenges that need addressing:**

- **Land Acquisition Coordination Challenges:** Land acquisition involves intricate coordination between the Department of Lands and Survey and the respective governmental entity. Once the Cabinet approves the acquisition, the relevant ministry informs the Department of the details regarding the required plots. Following this, a site inspection is initiated. Ensuring the availability of funds for the acquisition by the acquiring entity is also crucial before making a public announcement in the newspapers. Affected individuals then have a 15-day period to lodge any objections.
- **Valuation Process Complexities:** Property valuation is conducted by a Valuation Committee, comprising the Director of the Department of Lands and Survey, an accredited surveyor, and representatives from the Ministry of Finance and the Audit Bureau. This committee considers the recent sale prices of similar properties, the value of assets on the property, and income generation from these assets. A newly formed Administrative Cost Committee aims to assess land prices more broadly to provide a more accurate baseline for valuations.
- **Lack of a Dedicated Grievance Redress Mechanism:** There is no specialized grievance mechanism for land acquisition. General grievance channels of line ministries are available for use, but disputes over compensation amounts typically require court intervention. Consequently, many land acquisition cases are resolved through lengthy legal processes.
- **Legal Coverage and Support for Disadvantaged Groups:** The Real Estate Law addresses the rights of individual legal landowners but does not recognize collective or community land rights.
- **Overlooking the Needs of Disadvantaged and Vulnerable Groups:** No special considerations or support structures are in place for disadvantaged or vulnerable groups under the current law. Women's property rights and compensation issues, particularly in cases where they cede their entitlements to family members, are not directly addressed by the Department of Lands and Survey.
- **Operational Hurdles in Land Acquisition:** These includes:
  - Documentation discrepancies arise between electronic and paper cadastre records, with only about 65% digitized.
  - Governmental coordination is often slow and bureaucratic, resulting in delays.

- Legal disputes can extend up to 8 years, inflating costs due to both legal expenses and the accrual of a 5% annual interest on the compensation amount owed by the Ministries.
- Valuations do not consistently reflect the current market price, as stipulated by law and valuation practices.

### **Risks and Gaps in the Existing Systems**

The evaluation has pinpointed several discrepancies between the land acquisition legislation and regulations (the Real Estate Law and Direct Purchasing Regulation) and the Core Principles of the Policy on Program-for-Results Financing. The principal areas of divergence include:

#### Top of Form

- REL has no explicit provision for restoring the loss of income sources or means of livelihood.
- The Law permits expropriation without compensation for up to 25% of the plot area if the purpose of the expropriation is for (i) the construction or expansion/widening of a road or (ii) the construction of a government housing project. Policy on Program for Results financing requires full compensation for all acquired assets.
- There is no specific provision in the law for tribal lands, or land to be acquired temporarily or for the loss of traditional use rights. There is therefore no requirement for compensation measures to be developed for the acquisition of tribal lands. Policy on Program for Results Financing requires full compensation for such acquisitions.
- There is no legislation that applies specifically to the rights of individuals or other parties in cases of physical resettlement and relocation. Policy on Program for Results financing require planning and implementation of relocation for those who lose their residential structures.
- The Jordanian REL is not clear on the issues of compensation payments for squatters or illegal occupation or use of registered properties. Policy on Program for Results financing recognize those impacted but without title as eligible for compensation or assistance.
- Compensation is lower than replacement cost (it may not even meet market cost). Depreciation is deducted. There are no provisions for additional compensation (for example, for administrative charges or transitional expenses) or additional benefits.
- The law does not provide for livelihood restoration.
- There is no community engagement in the design and planning stages of resettlement. There is also no meaningful and accessible public disclosure of information. There are no requirements for consulting disadvantaged and vulnerable groups, or any provision for gender-sensitive engagement.
- No clear grievance mechanism, other than recourse to courts.
- There is no requirement to prepare a Resettlement Plan. There is no requirement to monitor or evaluate the risks and impacts on affected persons once the compensation payments are made.
- The Real Estate Law or other national laws do not include provisions for compensation when there are restrictions of access to natural resources.
- Gaps related to potential land acquisition for Early Childhood Education (ECE) expansion and school rehabilitation. This includes Conflicts and challenges arising from

the Government Building Bylaw, which limits the Ministry of Education's ability to undertake construction projects exceeding certain financial thresholds.

#### 4.4.2 Recommendations

**Measure: (PAP action 6):** Implement the Land Acquisition SOPs that are being developed under the current P4R for any expected land acquisition or expansion requiring land acquisition as needed.

### 4.5 Core Principle #5 - Cultural Appropriateness and Equitable Access in Program Benefits

*Program E&S systems give due consideration to the cultural appropriateness of, and equitable access to, Program benefits, giving special attention to the rights and interests of Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities, and to the needs or concerns of VG.*

#### I. Risk of Lack of Social Inclusion and Equity

##### 1.1 Risk of Lack of Social Inclusion and Equity in Accessing KG2 (Area 1)

#### Institutional Setup and Regulatory Framework

**The Child Right Law No. 17 of 2022 in Article (16.B)** provides= that the Ministry of Education, in coordination with relevant entities, shall take actions to ensure the quality of education and provide a sufficient number of teachers and counselors in educational institutions, enhancing their performance, increasing their efficiency, and developing their skills. The law also guarantees in Article (25) that children with disabilities right to general education and integration into educational institutions, with the MoE and relevant bodies required to provide necessary accommodations and accessible education. If general education is not feasible, alternative educational arrangements that cater to their needs and are accessible must be provided.

**In compliance with Jordanian Education Law No. (3) of 1994** and its amendments, enrollment in KG2 is not obligatory. Nonetheless, adhering to the country's Environmental Management Vision (EMV) and the SDG 4, the Ministry of Education (MoE) has formulated a strategic plan aiming for 80% coverage in five years and striving for universal access within a decade, laying the groundwork to make KG2 education universally mandatory.

**The MoE has a Directorate of Education Management**, operates within the scope of the Secretary-General for Educational Affairs, which is directly under the Minister's oversight tasked with managing the deployment of assorted initiatives and projects tailored for KG2, in line with an organized annual agenda. Presently, the ministry boasts a network of 3,131 kindergarten classrooms across 1,700 schools, with a targeted expansion of 142 new KG2 classrooms annually, beginning with the 2017/2018 academic year, through the adaptation and outfitting of existing infrastructure.

**To support children who are not part of KG2 programs due to unavailability of facilities by MoE, the MoE provides the following:**

- **Equity-Focused Readiness Program:** Designed to provide equal educational opportunities, this program offers a comprehensive educational kit for parents and guardians of children who are not enrolled in kindergarten. The kit, aimed at promoting educational readiness, includes workbooks for Arabic and mathematics, as well as stationery. Parents interested in this initiative can register their children who are not attending any government or private kindergarten programs.
- **Entrepreneurial Learning Readiness Program:** Introduced as a pilot in the 2021/2022 academic year, this program is tailored for children not enrolled in kindergarten and is held once a week from 12:30 to 3:00 PM [in a second shift format], with support from GIZ. Following its initial success, the program has expanded to three days per week for the current term, focusing on fostering entrepreneurial skills and learning readiness. Children from diverse nationalities, predominantly Syrians, have the opportunity to participate in evening sessions funded by donors without stringent criteria. However, this arrangement is not systematic and is contingent upon the availability of funding and donor interest.

### **Implementation Performance Assessment**

**The Ministry of Education (MoE) has shown dedication to enhancing early childhood education;** however, to prevent the deepening of social inequalities, it must resolve several pivotal issues. A notable concern is the limited access for non-Jordanians. Government-operated kindergartens currently serve only Jordanian citizens, leaving out a vast number of non-Jordanian children, such as refugees and children of Jordanian mothers. Although donor-funded evening sessions offer some relief, they may not sufficiently meet the demand or match the quality of regular sessions.

**Additionally, the MoE is challenged by inadequate capacity and logistical hurdles that could thwart the goal of increasing kindergarten classroom availability,** potentially reinforcing social disparities. While there are programs to facilitate home learning and provide opportunities for those unable to attend KG2, parents still bear the brunt of caregiving and educational duties. Further, the policy of including only children with mild disabilities who do not need specialized support or facilities may lead to the exclusion of those with more substantial requirements, thus falling short of truly inclusive education.

### **Gaps in the Existing Systems**

- **Exacerbation of Social Inequalities:** Limited access for non-Jordanian children, including refugees and children of Jordanian mothers not entitled to citizenship, risks deepening social divides and educational disparities.
- **Limited Inclusivity for Children with Disabilities:** The policy of integrating only children with mild disabilities who do not require specialized support excludes those with more significant needs, undermining efforts towards fully inclusive education.

### **Recommendations**

**Measure (DLI verification 1):** The MoE should implement policies to extend kindergarten access to all children, including non-Jordanians and those with disabilities. This includes amending existing regulations to include non-Jordanian children and enhancing infrastructure and training to accommodate children with a range of disabilities.

## 1.2 Risk of Lack of Social Inclusion and Equity in Accessing Vocational Education (Area 2) and career Guidance (Area 3)

### Institutional Setup and Regulatory Framework

**The Vocational Education and Production Directorate (VEPD) orchestrating the governance of vocational education within the MoE.** The VEPD operates within the scope of the Secretary-General for Educational Affairs, which is directly under the Minister's oversight. The VEPD is structured into various divisions, each tasked with distinct responsibilities that collectively contribute to the holistic development of vocational training programs. These divisions include Professional Services, Career Guidance Department, School Furniture Production, Device Maintenance, and Occupational Health and Safety, managed through a contracted company to ensure adherence to school safety standards. Additionally, it includes Professional Information and Relations and Workshop Readiness division.

**The Vocational Education Topics covered by the directorate are comprehensive, spanning across multiple disciplines:** (1) Engineering, (2) Agriculture, (3) Hospitality, (4) Tourism and Travel, (5) Cosmetology, (6) Construction, (7) Design Art, (8) Creative Media, (9) Information Technology, (10) Business, and (11) Vocational Education. This diversity ensures that the vocational training provided is relevant and responsive to the evolving needs of the job market. A needs assessment, conducted with the support of Pearson and UNESCO and in consultation with the Jordan Chamber of Industry, identified the demand for adding Information Technology and Electricity for generators to the curriculum. The schools under this directorate are dispersed across the kingdom, with some being integrated into comprehensive schools that combine conventional learning with vocational education, while others are specialized institutions focused solely on vocational education, totalling 50 schools.

**A significant milestone for the VEPD is the initiation of the BTEC Program in the 2023/2024 academic year.** This program has now been expanded into a national system, implemented in 266 schools, including 4 military culture schools and 262 regular schools, with 17,800 students currently enrolled in 7 specialties. The BTEC Program introduces a BTEC classification for post-ninth grade students, starting from tenth grade and applying across two levels: the second level (equivalent to grade 10 with 480 hours) and the third level (720 hours for grades 11 and 12). Students are required to take subjects such as Arabic, Islamic Education, Computer/Digital Skills, History of Jordan, English, and units within the school subject group, depending on their specialization (e.g., agriculture, engineering), with an emphasis on practical application through projects, accounting for approximately 70% of the curriculum.

**The selection process for establishing new vocational schools is guided by criteria** such as population density, job market opportunities, central location preferences, and direct community interest from students and parents. The process for community members to request the establishment of a new vocational school starts with the submission of a request by students, parents, or educational council heads, highlighting the need for vocational education in their area. This request triggers a thorough assessment by the vocational training directorate, including surveys and studies on population density, job opportunities, and potential student interest. The findings undergo a comprehensive review to evaluate the feasibility and impact of the proposed school.

**The Child Law No. 17 of 2022 Article (26) guarantees that children with disabilities are entitled to vocational education** and rehabilitation appropriate to their age and needs, ensuring they have equal opportunities for employment and personal development. In exceptional cases resulting from the nature of the disability, the relevant authorities are required to provide specialized vocational education and rehabilitation programs. These programs must be hosted in institutions or rehabilitation centers that are suited to the needs of children with disabilities, conveniently located near their residence, or easily accessible to them.

**The integration of students with disabilities into vocational education is a key component of the ten-year inclusive education strategy.** Efforts have been made by MoE to assess which types of disabilities can be accommodated within vocational education programs, prioritizing student protection and safety. Consequently, 2023/2024 semester has seen the inclusion of students with disabilities in 10 designated specialties, such as engineering and Business IT. To support this initiative, liaison officers alongside evaluators for inclusive education have been appointed to assess and approve the enrolment of students into appropriate vocational training programs, in accordance with a predefined list of disability types. Additionally, the development of a training course for vocational education teachers on engaging with students with disabilities is underway, complemented by the creation of an informative brochure for parents detailing available resources and options.

**Under Area 2, concerning counseling and career guidance within primary, secondary, and TVET sectors,** the Career Guidance Division operates as part of the Supervision and Training Directorate. This directorate falls under the authority of the Secretary-General for Educational Affairs, directly accountable to the Minister. The division is tasked with providing career guidance pathways and uncovering opportunities for future vocational and career pursuits. Career guidance initiatives extend from grades 4-10 into secondary education via the BTEC system. Each of the 42 directorates features a Career Guidance head, with support from a career counselor, who frequently also serves as an educational counselor in schools. A notable advancement was the launch of professional guidance training by GIZ last year, resulting in the certification of 40 counselors. Currently, the dual role of educational counselors as career counselors underscores the pressing need for specialized career guidance training.

### **Implementation Performance Assessment**

**The BTEC Project reveals considerable strides towards making vocational education more inclusive.** By enrolling students in seven diverse specialties, the project underscores its dedication to expanding access, although it faces obstacles like financial constraints and a shortage of specialized educators. Particularly commendable is the initiative to accommodate students with disabilities into ten appropriately chosen specialties, representing a significant move towards a more inclusive educational framework, yet also underscoring the persistent necessity for robust support structures.

**The substantial expenses required for constructing new facilities and expanding existing ones,** coupled with the necessity for specialized instructor training and the limited number of vocational schools in isolated or poorly served regions, create considerable obstacles to vocational education access for students from low-income backgrounds, further complicating access and inclusivity



concerns. These challenges often force families to abandon the prospect of vocational education due to unaffordable transportation costs or the absence of nearby schools. Particularly impacted are girls, whose education might not be prioritized within their communities, leading to lower enrollment rates. This situation presents a dual risk: it restricts immediate educational opportunities and has enduring effects on social mobility and gender equality, as those who cannot bear transportation expenses face greater exclusion.

**The process for the establishment of new vocational schools is meticulously designed**, with factors such as population density, job opportunities, and community demand playing pivotal roles in determining locations for new schools. This process begins with community requests, leading to a detailed evaluation by the vocational training directorate, which assesses the viability and potential impact of a proposed school through comprehensive reviews. The decision-making process for establishing new vocational schools, despite being participatory, carries risks for inclusion and equity, particularly due to community bias. This process heavily relies on community demand, influenced by preferences that emerge from cultural norms and economic considerations, potentially favoring educational programs for one gender over another. Such biases might limit educational opportunities for girls in fields traditionally dominated by males, like certain engineering disciplines, or fail to adequately consider the educational needs of minority groups and individuals with disabilities. This reliance on community demand, without a strategic plan for wide geographic coverage, risks neglecting areas with lower population densities or those that are economically disadvantaged, thereby widening the gaps in access to vocational education and exacerbating social exclusion and inequality.

**Career guidance within the educational system faces several key challenges that affect its effectiveness.** A critical issue is the staffing shortage; the number of educational counsellors is insufficient to serve 500 schools, with many education counsellors acting up as career counsellors. This overlap underscores the urgent need for increased recruitment and enhanced training to expand career guidance capabilities. Furthermore, there's a vital need for comprehensive training for both department heads and counsellors to stay abreast of program updates, ensuring the advice provided to students is both current and relevant.

**The scarcity of resources in rural and peripheral regions reveals a significant digital divide**, impeding the delivery of contemporary career guidance essential for navigating today's job markets. Initiating community education from an early age, especially concerning new professions, is crucial for broadening students' understanding of possible career paths and mitigating gender bias. Additionally, much of the existing guidance material is outdated by 6-7 years, not reflecting the rapid pace of technological change, including the rise of artificial intelligence in various sectors. The forthcoming TAP project, promising material incentives for success in examinations aligned with the updated guides, is poised to be a significant step towards the 2025 educational guidance program award. This development points towards a move to modernise career guidance materials in anticipation of future needs.

Despite the MoE's efforts to embed gender awareness in its educational counsellor workshops to combat bias and ensure equitable vocational opportunities, further action is required to navigate the complex social norms prevalent in Jordan.

## Gaps in the Existing Systems

- **Bias in criteria that identify Schools for Expansion and Improvement:**
  - Societal and community biases influence the selection of vocational programs, often favoring traditional gender roles, which can limit opportunities for underrepresented groups.
  - The decision-making process for new school establishments may inadvertently prioritize areas or specialties based on community demands that reflect these biases, overlooking the needs of vulnerable populations.
  - Geographic disparities in school availability highlight an uneven focus on expansion and improvement efforts, leaving remote or economically disadvantaged areas with limited access to vocational education.
  - Community resistance to change adds an additional layer of complexity. This resistance, stemming from concerns over program excellence and a fear of new educational paths, manifests among students and parents alike. It also influences the parents' request for VT pathways.
- **Limited Accessibility Due to Economic Situation and Disability Inclusion:**
  - Financial barriers significantly impact students from economically disadvantaged backgrounds, with the high costs of transportation and the scarcity of local vocational schools presenting substantial hurdles to access.
  - The vocational education system faces challenges in fully integrating students with disabilities, due to a lack of specialized programs and comprehensive support systems designed to meet their diverse needs.
  - Economic constraints and insufficient disability accommodations contribute to a cycle of limited accessibility, reinforcing social exclusion and hindering the potential for these groups to benefit from vocational training opportunities.
- **Exclusion of Vulnerable Groups from career guidance,** arising from inadequate measures to ensure that career guidance is accessible and tailored to the needs of all students, particularly those from marginalized communities, leading to disparities in career opportunities and support.

## Recommendations

**Measure (DLI verification 4):** The MoE must implement inclusive and unbiased criteria for VT program expansion and counselling, focusing on equitable access for underrepresented groups and students from remote, disadvantaged areas. This may entail subsidizing transportation, increasing vocational schools in underserved regions, improving access for students with disabilities, and improving capacity and availability of counsellors.

## II. Risk of neglecting Gender-Based Violence (GBV), bullying, and sexual exploitation, abuse, harassment (SEA/SH) in system improvements (Area 1 and 2)

### Institutional Setup and Regulatory Framework

**Child Law No. 17 of 2022, in its article (17. B &C), mandates educational institutions to uphold children's dignity by prohibiting all forms of violence, including physical punishment, humiliation, and bullying, and ensuring mechanisms are in place for reporting and addressing such incidents.** Additionally, in article (21), the law strictly prohibits all forms of child abuse, exploitation, neglect, and economic exploitation. It mandates that professionals across various sectors, including education professionals to report any such incidents to relevant authorities. The Ministry of Social Development regularly monitors these cases to ensure the child's welfare within the family environment.

**The Issues of GBV, bullying, and sexual exploitation, abuse, harassment (SEA/SH) affecting students are handled by the Protection and Safe Environment Division.** The division was established in 2009 under the Supervision and Training Directorate, which functions under the jurisdiction of the Secretary-General for Educational Affairs, who reports directly to the Minister. The division, staffed by three employees, focuses on diminishing violence within schools to foster a secure and nurturing educational atmosphere. Its key objectives encompass reducing incidents of violence, ensuring a safe environment for students, providing guidance, and equipping students for future employment opportunities. The department addresses abuse complaints by following specific protocols and leveraging the civil service system to impose teacher penalties.

**To combat bullying, the MoE has implemented the "Quality Assurance System for Public and Private Kindergartens."** Specialized work teams have been established and trained to enhance the quality of kindergartens, paying particular attention to creating supportive physical and moral educational environments. Furthermore, the majority of educational institutions, including kindergartens, are now staffed with educational counsellors to provide additional support.

**Complaints regarding school violence are routed to the directorate from several sources:** 1. The Complaints Department; 2. The Media Department, which monitors and addresses incidents reported on social media; 3. UNICEF, specifically for issues arising in refugee camps; and 4. The Private Education Directorate, for concerns originating from private schools. The only exception to this process involves complaints from UNRWA schools, which are handled separately. Moreover, the Directorate manages a hotline (06-5680081), which fields 30-40 monthly complaints. Liaison officers and counsellors promptly address these on a daily basis.

**Monitoring School Violence Situations is part of the division mandate.** Since 2009, the Ministry has successfully worked towards reducing incidents of violence in schools, intending to achieve a 2% reduction each year. The initiative "Together Towards a Safe School Environment," in collaboration with UNICEF, conducts monthly surveys to identify and analyse six types of violence (physical, verbal, sexual, bullying, cyberbullying, and vandalism) across various demographics, including gender and location, from individual schools up to the Ministry level. Survey results are digitally recorded by schools, using the school's lab computers or, when necessary, mobile devices by teachers during class to ensure comprehensive data collection. Based on these survey insights, counsellors develop specific strategies to address the key sources of violence. The execution of these strategies is monitored by the Safe

Environment Council, which consists of a diverse group including the Director, teachers, a counsellor, parents, students, and members of the educational development council. This council not only reviews the data from the surveys but also supervises the implementation of action plans designed to mitigate violence.

**In collaboration with the Ministry, various organizations have initiated programs to reduce violence and enhance student life skills.** Save the Children has been instrumental in efforts to lower underage marriage and dropout rates through targeted programs designed to decrease violence and improve life skills. Additionally, the Norwegian Refugee Council (NRC) has contributed with the "Towards Better Learning" program, focusing on educational improvement and violence prevention. The International Relief Committee (IRC) has also launched initiatives tackling issues such as discrimination, cyberbullying, and employment, offering guidance and support to needy students. These collaborative efforts underscore a multifaceted approach to creating safer educational environments and equipping students with essential life skills.

**The Directorate employs a structured approach to managing cases of domestic violence and violence within schools through a detailed procedural guide.** This guide enables the identification of violence via physical signs, sensory observations, or direct disclosures to educators, counsellors, or directors. Once identified, cases are handled in line with specific procedures outlined in the guide, with serious incidents being forwarded to the Family Protection Department to ensure both appropriate action and confidentiality. In instances where a teacher uncovers evidence of domestic violence, a set of mandatory reporting protocols is activated to safeguard the affected family members. Historically, the Ministry did not involve itself in domestic violence issues before 2020. However, a consensus reached by the Family Council led to establishing a mandatory legal framework, marking a significant shift in the Ministry's approach to intervening in such cases.

**The Law for Protection from Domestic Violence No. 15 of 2017** outlines in articles 4 and 6 specific procedures and responsibilities concerning the reporting of domestic violence cases. Under this law, professionals across health, educational, and social services sectors, including teachers, are mandated to report any instances of domestic violence they become aware of, especially those involving individuals who are incapacitated or partially incapacitated. The law emphasizes the rapid response of the Family Protection Department to such reports, ensuring that all complaints or notifications received by various entities regarding domestic violence are forwarded to this department for appropriate action. When a teacher observes signs of domestic violence or is informed of such an incident, they are required to report this to the Family Protection Department, initiating a process that includes detailed recording of the incident, necessary medical intervention for the victim if required, and measures to ensure the victim's safety. This legal framework ensures a coordinated response to protect victims and uphold their rights, while also safeguarding the confidentiality and safety of those reporting the violence.

**The Gender Mainstreaming in Education Strategy, along with its 2023-2025 action plan, focuses its third strategic objective on creating secure and healthy educational settings for all students, regardless of gender.** This objective places a strong emphasis on the elimination of School-related Gender-based Violence (SRGBV), aiming to ensure that schools are environments where every student can feel safe and supported. This encompasses ensuring that gender considerations and student safety are paramount in both existing and future school planning, with a particular focus on mitigating

violence risks, including GBV within and surrounding school premises. An integral part of this objective also involves conducting baseline studies on early marriage, child labor, and GBV, to incorporate this data into the Open Education Management Information System (Open EMIS). This system will be linked with the school department to ensure a holistic and informed approach to addressing these critical issues and enhancing the educational environment for all students. Also, under Strategic Objective eight of the action plan, a creation of a set of standard operating procedures (SoPs) is included aimed at effectively tackling incidents of gender-based violence (GBV) both within and in the vicinity of school facilities. These SoPs are designed to ensure that when GBV incidents occur, they are met with appropriate and consistent sanctions and responses, establishing a clear and structured approach to maintaining a safe and supportive educational environment for all students.

### **Implementation Performance Assessment**

**The MoE has made significant strides in addressing school violence and enhancing educational and career guidance**, collaborating with UNICEF on the "Together Towards a Safe School Environment" initiative. This program conducts monthly surveys to identify and tackle various forms of violence, forming the basis for strategic interventions. Despite these efforts, the Protection and Safe Environment Division encounters challenges such as staffing limitations and accessibility issues with its hotline (06-5680081), which receives 30-40 complaints monthly. Addressed promptly by liaison officers and counselors, the hotline's effectiveness is hindered by its single-line setup, potentially leaving it occupied during peak hours and inaccessible outside standard work hours, which may exclude evening students. Peak complaint periods in April and October further strain resources.

**The practice of recording survey responses electronically**, sometimes using mobile devices by teachers when limited PC access is available, raises concerns over the integrity of student responses in less technologically equipped areas. This method could compromise the confidentiality and authenticity of responses, particularly when filled out on behalf of multiple students.

**The discrepancy in the reporting of SEA/SH, and GBV complaints through the Ministry's established hotline, compared to the anonymous "At your service" platform**, raises concerns about underreporting. While SEA/SH complaints are not claimed to be reported through the hotline, possibly due to its non-anonymous nature and operational constraints, these issues are prominently featured as the second most reported problem on the anonymous At your Service platform. Furthermore, the lack of data integration from various reporting mechanisms presents a challenge, hindering the systematic utilization of these insights for decision-making and the development of informed interventions.

**The Monthly Surveys provide valuable information, revealing differences in the violence types experienced by males and females**, with males primarily facing physical violence followed by verbal, and females encountering mostly verbal abuse. Despite these insights, not all incidents lead to formal complaints, and sexual harassment, although less common, still poses a concern. Complaints are more frequently reported in Amman, indicative of greater awareness and proactive follow-up, likely influenced by cultural differences. Bullying stands out as a pervasive issue, significantly affecting vulnerable groups like students with disabilities, autism, or refugee status, particularly Syrian students in evening sessions. Identified causes of violence, such as overcrowding, cultural diversity, economic

challenges, and insufficient recreational facilities, alongside the spike in violence rates post-COVID, emphasize the urgent need for addressing these issues. Despite the wealth of information these surveys and platforms offer and are already being used for correction actions on the school level, the lack of analysis of the hotline and “At your service” results to guide program design and corrective actions remains a missed opportunity for enhancing student safety and well-being.

### Risks and Gaps in the Existing Systems

- **Limited Reporting and Underreporting:** The single-line hotline and its operational limitations lead to underreporting of SEA/SH, and GBV, especially given its non-anonymous nature. This underreporting is a critical social risk, obscuring the true scope of violence and hindering effective intervention.
- **Data Integrity Issues:** Reliance on electronic devices for survey responses, especially in technologically limited settings, raises concerns about the authenticity and confidentiality of student feedback, impacting the credibility of violence monitoring efforts.
- **Integration and Utilization of Data:** The lack of systematic analysis and integration of data from various reporting channels, including the hotline and "At your service" platform, presents a gap in leveraging these insights for targeted, informed interventions to enhance student safety and well-being.
- **Vulnerable Groups at Higher Risk:** Bullying and violence disproportionately affect marginalized groups, including students with disabilities, autism, or refugee status, underscoring the need for focused attention and strategies to protect these students effectively.

### Recommendations

**Measure (PAP action 7):** The Ministry of Education (MoE) must support the development and implementation standard operating procedures (SoPs) aimed at effectively tackling incidents of gender-based violence (GBV) both within and in the vicinity of school facilities.

## III. Insufficient attention to gender considerations in program improvements

### Institutional Setup and Regulatory Framework

**The MoE strategy emphasises the gender lens** of its program and education environment. Therefore, in 2018, the Ministry established the Gender Division under the Planning and Education Research Directorate, which follows the SG for Financial and Administrative Affairs. The Gender Division was established as part of the SDDP project and funded by Canada, focuses on integrating gender into the development plans of directorates and schools.

**In 2018, the Division launched the Gender Mainstreaming in Education Strategy 2018-2022,** supported by the Canadian Embassy in Jordan and UNESCO, represents a concerted effort by the Ministry of Education to systematically address gender inequalities in the education sector. This

strategy, developed through extensive consultations with stakeholders from the Ministry, civil society, and development partners, seeks to ensure that educational policies and practices are inclusive and responsive to the distinct needs and aspirations of both male and female students. This strategy is fully aligned with the Ministry of Education's Strategic Plan for Education (ESE) 2018-2022, with the objective of bolstering its goals and integrating gender differentiation issues into its implementation. It also corresponds with key national strategic documents, such as His Majesty King Abdullah II's Royal Vision, the National Strategy for Human Resources Development 2016-2025, and Jordan Vision 2025, which encompass the long-term social and economic visions for the nation. The Ministry of Education is tasked with the execution and oversight of this strategy.

**Key strategic areas include ensuring gender equity in early childhood education, promoting safe and healthy learning environments free from gender-based violence,** and fostering gender-sensitive informal education and lifelong learning opportunities. The strategy also focuses on integrating gender considerations into performance management, using gender-disaggregated data for informed decision-making, and eliminating gender bias and stereotypes from teaching materials. Additionally, it advocates for equal access to technology for all students, aiming to bridge the digital gender gap and enhance girls' digital competencies.

**In 2021, the Ministry of Education undertook a critical midterm review of the Educational Sector Plan (ESP),** resulting in the decision to extend its objectives to 2025. Alongside this, **the Ministry performed a midterm assessment of the Gender Equality Action Plan (GEAP)** to gauge progress, account for the impacts of the COVID-19 pandemic and implement necessary amendments. The comprehensive evaluation of the Gender Mainstreaming Strategy (SMGEE) encompassed six pivotal areas: Early Education and Childhood Development (ECED), Access and Equity (A&E), System Support (SS), Quality, Human Resources (HR), and Vocational Education (VE). This systematic review, conducted as part of the Mid-Term Review, meticulously appraised the 109 activities, 37 sub-objectives, and 15 strategic goals that were part of the preceding Gender Equality Action Plan. These evaluations informed the creation of a new action plan for 2023-2025. The review and planning process was collaborative, involving many stakeholders, including teachers, Ministry employees, field operatives, partners, and civil society organisations. This inclusive approach ensured that the amended ESP and GEAP would reflect diverse perspectives and experiences, positioning the Ministry to better achieve its gender equality objectives in the education sector through 2025.

**The new action plan's focus included 12 main objectives, some of which are very relevant to the program.**

**The first objective of the plan is to ensure gender equality in accessing high-quality Early Childhood Education and Development (ECED) for both boys and girls, which aligns with Area 1 of the PforR Program.** To achieve this, the strategy is to support the incorporation of gender mainstreaming into the criteria for kindergarten accreditation. There's also a focus on implementing preparatory programs for boys and girls who have missed ECED, equipping them with the essential knowledge and skills required for their subsequent transition into primary education. Furthermore, the plan involves the incorporation of gender mainstreaming into the training and educational programs associated with ECED, alongside the thorough evaluation of these programs to maintain gender-sensitive educational practices.

**The second objective aims to embed gender equality across all facets of care, play, and educational environments within ECED programs, which also aligns with Area 1 of the PforR Program.** This involves advocating for comprehensive care that caters to both boys and girls, encompassing aspects such as health, nutrition, social protection, and early education. It emphasizes involving educational staff, service providers, and parents in these efforts. A significant part of this objective is to integrate gender mainstreaming into activities involving parents, enhancing community support for ECED with a focus on engaging both parents and service providers. Additionally, the plan includes researching positive masculinity within ECED contexts and explicitly exploring effective strategies for father involvement in early childhood education.

**The third strategic objective is dedicated to fostering safe and healthful educational environments for both male and female students, with an emphasis on eradicating School-related Gender-based Violence (SRGBV).** This encompasses ensuring that gender considerations and student safety are paramount in both existing and future school planning, with a particular focus on mitigating violence risks, including GBV within and surrounding school premises. A pivotal aspect of this initiative involves implementing safe transportation strategies for students who reside at considerable distances from their schools. An impact study will be carried out to evaluate the relationship between the school environment and academic success, aiming to generate actionable recommendations. Furthermore, workshops will be organised for the Directorate of Buildings and other relevant stakeholders, concentrating on creating gender-sensitive educational settings. These workshops will address aspects such as WASH (Water, Sanitation, and Hygiene) facilities, the dangers of SRGBV, the provision of amenities for children with disabilities, and the availability of first aid. An integral part of this objective also involves conducting baseline studies on early marriage, child labor, and GBV, to incorporate this data into the Open Education Management Information System (Open EMIS). This system will be linked with the school department to ensure a holistic and informed approach to addressing these critical issues and enhancing the educational environment for all students.

**Strategic Objective 4 centers on bolstering inclusive education by acknowledging and catering to the unique needs of both boys and girls,** with a special emphasis on those from vulnerable groups and children with special needs. It also involves raising awareness among students, especially those in vulnerable situations, as well as their parents and communities, about the significant advantages of education. Furthermore, the objective commits to ensuring that non-formal education and lifelong learning opportunities are designed with gender sensitivity at their core.

**Strategic Objective 5 focuses on integrating gender mainstreaming into the performance management of institutional frameworks within the Ministry of Education, which aligns with Area 3 of the PforR Program.** This includes ensuring that laws, policies, programs, rules, and procedures adopt a gender perspective and actively prevent gender-based discrimination. The objective outlines the necessity for analyzing new educational policies, plans, programs, and legislation through a gender lens, providing recommendations for a gender-focused approach. It also calls for the development of new standards, metrics, frameworks, and guidelines from a gender lens to enhance the Ministry's operations. A key component is supporting the Gender and Strategic Partnerships Department (GED) within the Ministry to fulfill its monitoring, evaluation, and implementation roles effectively. This support ensures the GED has the authority and capacity to mainstream gender equality across the



education sector. It includes conducting gender audits per ILO guidelines and developing a capacity-building plan based on these audits. Strategic Objective 5 also aims to establish mechanisms for accountability in implementing the Gender Action Plan (GEAP), ensuring continuous monitoring and annual reporting by senior departments of the Ministry. Activities under this objective include conducting gender-sensitive budgeting, implementing leadership development programs, organizing workshops on monitoring and evaluation from a gender perspective, and promoting sex-disaggregated data for informed decision-making, including addressing gender-based violence.

**Strategic Objective 6 aims to purify teaching and learning content from any gender bias and stereotypes, ensuring an educational environment that supports human rights and gender equality, which also aligns with Area 1 and 2 of the PforR Program.** This objective involves a thorough review of textbooks and curricula from a gender perspective, checking for and eliminating any biases and stereotypes. Additionally, it encompasses the continuation of training, workshops, and skills support initiatives focused on weaving gender equality and human rights principles into school curricula.

**Strategic Goal 7 is to guarantee equitable access to technology, specifically addressing the digital gender gap and promoting digital skills and competencies for girls.** This goal involves enhancing understanding of the gender digital divide and identifying opportunities to foster gender equality within the realm of innovative education. Key actions include conducting research on the digital gender divide and exploring educational innovation as a means to support gender equality. This research aims to assemble a comprehensive overview of the gender gap, utilizing existing materials and conducting additional research as necessary.

**Strategic Objective 8 targets the mitigation of dropout causes among students and the assurance of a safe and enriching educational environment, which also aligns with Area 1 and 2 of the PforR Program.** It promotes gender-responsive programs to support the educational catch-up of school dropouts and the delivery of literacy programs for those who have missed out on formal education. The objective also encompasses the implementation of the Adult Literacy Programme through a gender lens and the development of a dropout database linked to the OpenEMIS, detailing labor market access and early marriages by sex and region. Furthermore, school and community initiatives are in place to combat drug abuse, violence, bullying, and gender-based violence. Awareness campaigns, school events, and workshops, supported by educational counsellors, focus on safeguarding students and fostering zero tolerance for GBV. Efforts to engage school teachers and principals in community forums are also part of the strategy to address broad educational concerns, including dropout rates, child marriage, child labor, and GBV, enhancing the involvement of both females and males in these critical discussions. An essential aspect of Strategic Objective Eight is the creation of a set of standard operating procedures (SoPs) aimed at effectively tackling incidents of gender-based violence (GBV) both within and in the vicinity of school facilities. These SoPs are designed to ensure that when GBV incidents occur, they are met with appropriate and consistent sanctions and responses, establishing a clear and structured approach to maintaining a safe and supportive educational environment for all students.

**A3-Strategic Objective 9 is committed to ensuring that educational policies, particularly those pertaining to teachers, are mindful of gender differences, which aligns with Area three of the PforR Program.** This objective involves incorporating gender-responsive teaching methods into the training

programs for educators across all specializations. It also includes supporting the gender-sensitive evaluation of existing and prospective teacher training programs. To further this agenda, there's a plan to design and execute workshops and training for personnel at all levels on gender issues in education. In male schools, efforts to be made to improve the school environment and enhance respect for teachers, with initiatives like a recognition program to celebrate schools that foster concepts of positive masculinity. Additionally, the objective proposes a gender-sensitive and performance-based career structure to motivate male teachers and encourage the advancement of female teachers into leadership roles. This includes supporting the enforcement of a Code of Conduct for School Teachers to address GBV and evaluating teacher training curricula using a newly developed checklist to ensure they are gender-informed. Finally, Strategic Objective 9 aims to increase the representation and accountability of women in administrative leadership within the Ministry of Education and its field directorates. Leadership training and workshops to raise awareness about transformative leadership with a gender perspective are to be provided to both female and male management staff.

**Strategic Objective 10 aims to enhance gender balance within the management of vocational education by infusing a gender perspective into the vocational education system's analysis to pinpoint and address existing gender gaps and disparities, which align with Area two of the PforR Program.** This objective includes carrying out a gender-responsive analysis that connects technical and vocational education with the labor market's needs and opportunities. It also involves performing tracking studies to evaluate the interest and access of both male and female students in vocational education and potential career paths available in their local regions. Furthermore, Strategic Objective 10 focuses on augmenting the capability of career counselors to offer gender-appropriate career guidance to students. To achieve this, workshops will be conducted to ensure that both male and female counselors are equipped with up-to-date, gender-sensitive approaches in vocational education guidance processes.

**Strategic Objective 11 is dedicated to promoting equal learning opportunities in vocational education and enhancing access for both females and males to non-traditional vocational pathways, also , also aligns with Area two of the PforR Program.** This includes broaden awareness among students and parents about non-traditional career options for both males and females through career guidance, counseling, and awareness campaigns. It aims to leverage success stories as a motivational tool to prompt students and parents to consider and pursue innovative and unconventional career paths in vocational education.

**Strategic Objective 12 focuses on ensuring that the contents, processes, and environments associated with vocational education are devoid of gender bias and stereotypes, also aligns with Area two of the PforR Program.** It is about guaranteeing that vocational education is developed with the needs, learning styles, and interests of all students in mind, irrespective of their gender. To this end, technical expertise on gender equality will be integrated into the design and development of vocational education curricula, as well as the corresponding teaching and learning resources, to cultivate an equitable and inclusive vocational training environment.

**With a focus on concerning counselling and career guidance within primary, secondary, and TVET sectors Under Area 2,** the Career Guidance Division operates as part of the Supervision and Training Directorate within the scope of the Secretary-General for Educational Affairs,

which is directly under the Minister's oversight. This directorate falls under the authority of the Secretary-General for Educational Affairs, directly accountable to the Minister. The division is tasked with providing career guidance pathways and uncovering opportunities for future vocational and career pursuits. Career guidance initiatives extend from grades 4-10 into secondary education via the BTEC system.

**Also, within the Supervision and Training Directorate, the Professional Relations and Information Division operates to support vocational training (VT) programs.** This division is tasked with an array of critical functions. It oversees the management of VT information that serves the needs of the administration, students, and teachers. It also establishes and maintains partnerships with external entities to secure practical training opportunities for students. These partnerships encompass not only skill application workshops but also collaborations with public and private sector organizations across a range of specialities, ensuring students receive comprehensive practical experience. A significant aspect of the division's work involves developing and managing a student protection model, which includes vigilant monitoring of student engagement and overall safety. Furthermore, the division is responsible for orchestrating and finalizing Memorandums of Understanding (MoUs) and formal agreements with companies that provide essential practical training venues, solidifying the bridge between educational programs and real-world application.

**Finally, a planned collaboration with the Gender Department is set between the Planning and Educational Research Directorate's newly formed Risk Division.** This collaboration intends to guarantee that upcoming risk procedures and strategic plans are infused with a gender-sensitive perspective. This proactive approach is aimed at ensuring that risk assessments and mitigation strategies take into account the different impacts on and needs of all genders, thus fostering an inclusive and equitable environment within the educational framework.

**Its important to highlight that the Program involves launching and assessing a pilot Skills Development Fund (SDF)** that incorporates various financing avenues to encourage private sector engagement in Technical and Vocational Education and Training (TVET) through competitive and performance-driven funding. This Operation will specifically address and mitigate gender-based and refugee-related obstacles that hinder students' transition from school to the workforce, while also focusing on sectors that promote the green transition.

### **Implementation Performance Assessment**

**The MoE has demonstrated a concerted effort to integrate a gender perspective across its educational programs and interventions.** As part of the Gender Action Plan, the MoE has initiated gender training for teachers since 2021, reaching 8,000 female and 3,000 male teachers with Canadian-funded programs addressing gender-based violence and the mainstreaming of gender in education. The follow-up Training of Trainers (ToT) program, conducted over two years and in partnership with UNHCR and USAID, has further entrenched this gender-focused educational approach. Additionally, a cross-collaborative workshop engaging 24 professionals from the MoE and the National Curriculum Directorate (NCD) resulted in developing an evaluative tool for curricula assessment through a gender lens, now officially endorsed and implemented. In 2022, an extensive

review process of educational materials across key subjects commenced, culminating in evaluating 276 educational resources by 2023.

**In the realm of Vocational Training, Area two of the PforR Program**, while strategic objectives 10-12 aimed at gender mainstreaming have been set, the actualisation of these plans is pending. Although the BTEC curriculum is awaiting a gender review, there are strategies to address this through UNESCO in the upcoming year, focusing on revising educational materials for grades 4-9. Discussions with the Career guidance division indicate that while the MoE is aware of the need to avoid reinforcing gender stereotypes in counselling, concrete measures to ensure systematic implementation are not yet evident. Also, the Division already face challenges in limited capacity in terms of number of available counsellors and their training.

**In Jordan, societal conventions and gender norms deeply influence vocational training choices**, guiding students and parents towards careers traditionally associated with their gender. This dynamic often hinders individuals from pursuing careers that align with their true interests, especially if such careers are not typically associated with their gender. For instance, fields like design and cosmetology are often earmarked for females, whereas males are encouraged towards sectors like technical or industrial work. This dichotomy not only constrains the career choices of the youth but also affects workforce diversity and sector inclusivity.

**Confronting these societal norms demands a comprehensive strategy embedded across area two under the PforR interventions.** Initiatives might range from awareness campaigns aimed at dismantling stereotypes to promoting success stories of individuals thriving in atypical roles for their gender. Such narratives can potentially broaden horizons for both students and parents, underscoring the array of benefits vocational fields offer. Education policies and career guidance programs should intentionally provide gender-neutral counselling and disseminate unbiased information. The MoE has a crucial role in fostering educational spaces that are welcoming to all genders, backed by a workforce trained in gender sensitivity. Collaboration with the private sector is also crucial for effecting change. Offering internship and training opportunities devoid of gender prejudices can be transformative. Establishing partnerships between the MoE and private sector entities ensures that vocational training is aligned with the genuine needs of the labor market without gender constraints.

### **Gaps in the Existing Systems**

**Gender Stereotypes in TVET Program Design:** A notable gap in the TVET programs is their potential to perpetuate gender stereotypes due to a lack of intentional design for equality. Currently, these programs might not adequately address or challenge the deep-seated societal expectations that dictate 'suitable' careers for different genders. This oversight can inadvertently steer students towards traditional gender roles, thereby restricting the full spectrum of vocational opportunities and reinforcing existing workforce gender disparities.

### **Recommendations**

**Measure (DLI Verification 5):** Given the existing strategic objectives within the gender strategy's action plan 2023-205, that are yet unimplemented, the recommendation to reinforce actions under the gender plan, especially with a focus on the risks identified, would be:

- **Immediate Implementation of Gender-Responsive Analysis:** Fast-track the execution of gender-responsive analyses within the vocational education system to identify gender gaps and disparities promptly. This analysis should directly inform curriculum development, teaching methods, and career counselling approaches to ensure they meet the diverse needs and interests of all students.
- **Enhanced Training for Career Counselors:** Intensify training programs for career counsellors, incorporating the latest gender-sensitive methodologies and insights from gender-responsive analysis. Ensure these training programs are mandatory and include assessments to measure counsellors' understanding and application of gender-inclusive practices.
- **Active Promotion of Non-Traditional Pathways:** Launch targeted awareness campaigns that specifically promote non-traditional career paths to both students and parents. These campaigns should highlight success stories of individuals excelling in fields unconventional for their gender, using various media platforms to maximize outreach and impact.
- **Monitoring and Evaluation Mechanisms:** Establish robust monitoring and evaluation mechanisms to track the effectiveness of the implemented gender-sensitive practices within vocational education. This should include feedback loops from students, parents, and educators to continuously refine and adjust strategies to achieve the desired gender balance in vocational education management and participation.
- **Partnership with Industry and Community Leaders:** Forge strategic partnerships with industry leaders and community influencers to advocate for and support the integration of gender balance within vocational education. These partnerships can provide practical opportunities for students to explore non-traditional careers and create a supportive community ethos that champions gender equality in vocational choices.
- **Policy Advocacy and Guidelines Update:** Advocate for policy revisions and updates to existing guidelines that govern vocational education, ensuring they are explicitly aligned with gender equality goals. Policies should mandate the inclusion of gender-sensitive approaches in all aspects of vocational education, from administration and curriculum development to career guidance and student assessment.

#### 4.6 Core Principle #6 - Social Conflict

*Program E&S systems avoid exacerbating social conflict, especially in fragile states, post-conflict areas, or areas subject to territorial disputes.*

#### **Institutional Setup and Regulatory Framework**

In 2021, Jordan initiated the **Public Sector Modernization Roadmap**, aiming to overhaul and enhance the efficiency of various sectors, including education, through a comprehensive and participatory approach. This ambitious plan was structured around the assembly of specialized teams comprising technicians, experts, and stakeholders, focusing on the modernization of three key citizen service sectors: health, education, and water. These teams engaged in a series of meetings, workshops, and studies to examine the current state of these sectors, assess institutional culture, and identify areas for improvement. Central to the Roadmap were three pillars designed to uplift the quality of public services, boost institutional efficiency and effectiveness, and refine the legislative framework

governing public administration. Specifically, the improvement of institutional performance targeted the development of organizational structures, governance, legislative adherence, and planning and decision-making mechanisms. It also focused on enhancing human resource management, attracting and retaining skilled personnel, and nurturing a culture of public service and productivity.

**Within the realm of education, the Roadmap aimed to standardize the entities responsible for crafting educational policies and harmonizing the coordination of educational plans, programs, and services across all stages of learning.** From early childhood development through to higher education and vocational training, the objective was to support a lifelong learning pathway for citizens, ensuring adaptability to the evolving demands of the labor market through the introduction of micro-credentialization. This effort underscored the government's commitment to improving the quality of education and aligning it more closely with the needs of both individuals and the broader economy.

**Reforms slated for 2022-2024 include the merger of the Ministry of Higher Education and Scientific Research with the Ministry of Education to form the Ministry of Education and Human Resource Development.** This reorganization seeks to consolidate curricula development under the National Center for Curriculum Development, thereby centralizing the curricula framework. Additionally, responsibilities concerning nurseries and Al-Manar learning centers will transition from the Ministry of Social Development to the newly established ministry, standardizing nursery references and ensuring inclusivity in early education. Moreover, the consolidation of the Jordanian Accreditation and Quality Assurance Commission for Higher Education Institutions with the Technical and Vocational Skills Development Commission aims to create a singular, independent entity for accreditation and quality control across all educational institutions, linked directly to the Minister of Education and Human Resource Development. The plan also involves dissolving the Vocational Training Corporation, with its duties absorbed by the Ministry of Education and Human Resource Development. This move is intended to unify and streamline vocational education and training, offering students more coherent pathways and flexibility in selecting their field of study, thus promoting a more integrated and comprehensive approach to education.

**The Directorate of Human Resources Management, which falls under the purview of the Director-General for Financial and Administrative Affairs, who reports directly to the Minister, plays a critical role in implementing the restructuring advised by the Public Modernization Roadmap.** This Directorate is pivotal in managing the MoE's complex organizational structure, which encompasses 42 directorates, each subdivided into 16 departments, totaling over 672 departments.

### **Implementation Performance Assessment**

**The Directorate of Human Resources Management is leading reforms to modernize the Ministry of Education's human resources system,** aiming to replace the outdated current framework with an advanced electronic management system. This overhaul includes introducing Job Description Cards (JDCs) to delineate employees' roles precisely, in line with legal requirements, and a strategic shift to bring employment and recruitment processes in-house by 2027, supported robustly by the Service and Public Administration Commission (SPAC). An essential measure for elevating educational standards is the forthcoming mandate for aspiring teachers to obtain a Postgraduate Diploma by 2027, although plans for transitioning current teachers to meet this criterion are still under formulation.

**It also manages the current promotion mechanism for teachers seeking supervisory positions**, which is currently digitised, necessitating that candidates submit their applications for committee evaluation based on predefined criteria. However, stakeholder dialogues have cast light on significant quality assurance issues within this process, notably a lack of sufficient expertise among some committee members, leading to an almost guaranteed approval rate for all candidates.

**This process, perceived as lacking rigour, which could instigate a sense of unfairness and undermine trust within the educational community**, potentially affecting not just promotions but also areas covered under the PforR program's DLI 7, aimed at bolstering counselling and career guidance. The absence of a stringent evaluation protocol might foster unrest among educators, risking broader social discord and diminishing faith in the Ministry's management of professional development pathways.

**This point surfaced during discussions with stakeholders, suggesting that other issues might also come to light** if the MoE engaged a broader spectrum of stakeholders throughout its development processes. Discussions with stakeholders also revealed concerns about uncertainty regarding how their careers will be impacted and what changes to expect in the future. The shift towards a new governance model in the education sector, part of a larger initiative to modernise the public sector, may entail inherent risks, particularly in terms of social harmony and buy-in to the changes. The prospect of escalating social conflicts looms if reforms do not thoroughly engage with all societal stakeholders or sufficiently consider the varied needs of different groups, leading to perceptions of exclusion and igniting potential strife.

**A critical shortfall in the Directorate's approach is the omission of specific Social Impact Studies and comprehensive external consultations** about these significant transformations. While some internal consultations and preliminary discussions were part of the initial Public Sector Modernization Roadmap efforts, there seems to be a lack of a coherent strategy for stakeholder engagement concerning the imminent governance restructuring, its communication, and change management aspects, including the need for gender-sensitive HR policies.

**This oversight also suggests a disconnection between the MoE's ambitious gender action plan**, which calls for a gender-sensitive career structure to motivate and advance educators, and the current HR practices. Despite the Gender Division's engagement in various initiatives to promote gender equality within the educational sector, discussions indicate a palpable lack of synergy with the HR Directorate's operations, underscoring a need for a more integrated approach to address these challenges comprehensively.

### **Risks and Gaps in the Existing Systems**

**The critical social risk emerging from this assessment is the potential for increased social tension and conflict** within the educational community due to perceived unfairness and lack of transparency in the NoE's promotion and professional development processes. The lack of comprehensive stakeholder engagement and external consultations in developing and implementing new HR policies, including transitioning to a modernised electronic HR management system, further exacerbates these risks. Moreover, the absence of a systematic strategy for integrating gender-sensitive practices and the need for clear communication about career impacts add layers of uncertainty and potential

dissatisfaction among educators, risking broader social discord and eroding confidence in the Ministry's governance and reform initiatives.

## Recommendations

**Measure (PAP Action 8):** The Ministry of Education must develop and execute a comprehensive stakeholder engagement strategy that includes MoE staff across all levels, parents, and students in shaping and rolling out the new governance framework for the education sector.

### 4.7 Proposed Program GRM

**The Complaints and Grievances Division (CGD) operates under the mandate of the Internal Control Unit,** which is directly linked to the Minister's office as stipulated by Bylaw No 124 of 2019, amending the MoE's Administrative Organisation System No 46 of 2001.

**The organisational structure** places the Internal Control Unit at a level equivalent to a directorate, directly reporting to the Minister. Under this unit are divisions of Financial Audit and Monitoring, Administrative Audit and Monitoring, Technical Audit and Monitoring, Complaints and Grievances, Quality and Standards, and Administrative Performance. The staff within the CGD, comprising a head, members, and a programmer, specialises in administrative science and follows specific job descriptions as per the Ministry's regulations.

**The MoE implement Grievance Redressal Mechanisms (GRMs) at two distinct levels:**

**National-Level GRM: "At Your Service":** This GRM facilitates interaction between the public and MoE through five channels: inquiries, suggestions, praise, complaints, and reports of corruption. It utilizes a mobile app, an e-government portal, and the National Information Center. A chatbot for the Prime Ministry's Facebook page is being developed. The platform processes are well-defined but lack detailed data segmentation by demographics like location, gender, or age, with anonymity preserved except for contact details. An optional GPS feature is available, but its precision is debatable. The platform has a structured protocol for handling complaints, including categorization, logging, and case referral, as per the Organizational and Procedural Regulations. Complaints are sorted by severity and type, and users receive SMS notifications throughout the resolution process. There's a system for the automatic escalation of unresolved issues, and a national dashboard documents all activities, with various metrics used for analysis and performance assessments. Complaint resolutions are communicated through updates, with cases marked as resolved, cancelled, or returned.

**MoE-Level GRM:** This refers to mechanisms specific to MoE. The predominant tools employed by MoE for grievance redressal encompass a blend of digital and traditional mechanisms to ensure inclusivity and accessibility. Channels for Submitting Complaints are:

1. **Educational Directorates** (42 Directorates and 20 Administrative Units within the Ministry): Complaints can be made in writing or verbally to the Director of Education at the directorates. A committee, including a representative from the control department, is formed within the directorate to address the complaint locally.



2. **Ministry Center Complaints:** The complaints department processes these through an internal memo to the relevant department or provides direct instructions for the complainant to file a complaint directly with a particular division. His decision on either case is based on a personal assessment of the complaint format.
3. **Direct Submission to High-Level Officials:** Complaints are sent directly to the minister, secretary-general, and audit bureau and sent to the complaint department to follow up with the relevant department.
4. **Email:** A dedicated email address for submitting complaints.
5. **Hotlines:** Separate hotlines are available for both the directorates and the ministry to facilitate the submission of complaints.
6. **Complaint Boxes:** These are located at the department head's office for review at the Ministry. Within the directorates, each director is responsible for the review and resolution.
7. **Ensaf Platform (under improvement now):** Since its establishment in 2018, the "Insaf" platform has served as a dedicated electronic channel for both public and private sector teachers to voice their grievances and complaints. The platform seeks to streamline the resolution process, ensuring timely and quality responses to the issues raised. Integrated with the Ministry's Internal Control Unit, "Insaf" ensures strict confidentiality for all submissions, although it requires complainants to provide detailed personal information, limiting anonymity<sup>7</sup>. The World Bank, in line with the current "Education Reform Support Program for Results," has embarked on a comprehensive evaluation of the Ministry's GRM) including "Insaf." This assessment aims to pinpoint potential improvements needed. The "Ensaf" platform is under technical improvement now to evolve beyond merely receiving complaints from teachers; it is envisioned to streamline the entire process of addressing grievances within the internal framework of the Ministry of Education and its directorates. This enhancement aims to refine the integration of various complaint intake channels, including the "At Your Service" platform, facilitating a more efficient and cohesive handling of grievances.

**In 2021, The MoE has established a procedural manual for handling complaints and grievances,** which falls under the domain of the Internal Control Unit. The manual delineates the roles and procedures for processing complaints. It organises the flow from receipt to resolution, emphasising the swift and systematic handling of issues raised by employees, citizens, and other entities.

**According to the manual, the divisions receive complaints from different resources and through different channels.** It receives complaints and grievances from employees and citizens (in line with ISO accreditation) and monitors social media through the media directory. Additionally, it manages complaints received via fax, email, phone, hotline, the Minister's and the Secretary-General's offices, external entities (like the Royal Court, Prime Ministry, Anti-Corruption Commission, Audit Bureau, and National Center for Human Rights), complaint boxes, and the Ministry's electronic platform.

**Complaint handling procedures** outlined in the manual ensure that all complaints received via these channels are reviewed, commented on by the division, and then escalated to the director of the Internal Control Unit for further action. Recommendations for each complaint are documented and

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<sup>7</sup> Insaf Platform. Available at: <http://insaf.gov.jo/webform/default.aspx?lang=1>

followed up accordingly, with updates communicated to complainants either by phone or formal letter, depending on their relationship with the Ministry. The outcomes are recorded on the electronic complaints' platform. In some instances, the complaint may lead to the Internal Control Unit director recommending the formation of an investigation committee, suggesting specific actions to the Minister, or coordinating directly with the Directorate of Education for resolution within two weeks, unless an extension is requested.

***Gaps identified in the existing system:***

The team has identified critical inefficiencies in the MoE GRM, notably:

**Centralisation and Confidentiality Gaps:** The Ministry of Education (MoE) grapples with centralisation challenges, lacking a cohesive system for managing and documenting complaints. This results in inconsistent recording and handling of complaints at various directorate levels, complicating the resolution process as duplicates may emerge. Moreover, submitting complaints through multiple channels without a centralised database hampers the identification of recurring issues. Concerns over anonymity and confidentiality arise when direct departmental communications potentially reveal sensitive complainant details, possibly deterring reports of sensitive issues due to privacy fears.

**Inconsistent Complaint Processing:** Complaints received are subject to variable handling based on individual assessment, leading to inconsistent documentation and follow-up. This inconsistency extends to how complaints are logged and addressed, with some being merely noted in an Excel sheet without clear action plans. High-level submissions sometimes bypass system entry altogether, indicating a tracking shortfall.

**Manual Handling and Data Analysis Deficiencies:** The MoE's reliance on manual processes for complaint management introduces errors and delays. Despite generating analytical reports on frequent complaints, a formal analytical framework is lacking, underscoring the need for a more structured approach to utilizing complaint data for systemic improvement.

**Strategic Utilization of Complaints:** Analysis reveals a missed opportunity in using complaint reports for strategic decision-making. Despite identifying recurring issues, the insights from complaint data seldom inform ministry-level decisions or strategic planning. Moreover, the disconnection between complaint data and operational improvements, particularly in selecting schools for evaluation, hinders a holistic understanding of educational system challenges.

**Lack of Mandated Grievance Mechanisms for Projects and Programs:** The absence of mandated grievance mechanisms for projects and programs leaves stakeholders without formal channels to voice concerns or seek resolutions, potentially leading to unresolved grievances and conflicts.

**Underutilization of Complaint Reports in Decision-Making Processes:** The Ministry of Education's (MoE) approach to complaint reports lacks integration into decision-making and strategic planning. Despite collecting actionable feedback through the "At Your Service" platform, this data seldom influences ministry-level decisions. Recurring complaints about registration, exams, and school management issues highlight systemic problems that persist without resolution.

**Disconnection Between Complaints Data and Strategic Planning:** The MoE's failure to incorporate complaint feedback into strategic planning and operational improvements represents a significant oversight. The lack of collaboration between the Complaints Directorate and other key directorates, such as Quality Assurance, limits the MoE's capacity to address specific concerns within schools based on stakeholder feedback. This compartmentalized approach hinders the development of a unified strategy to address the educational community's grievances and needs effectively. Insights from complaint trends, especially those related to school violence, are not fully leveraged for continuous improvement, missing a critical opportunity to enhance stakeholder satisfaction and ensure a safer educational environment.

**Issues with the violence, GBV, and SH/SEA complaints:** Despite the early childhood division's efforts, including a hotline for complaints, no SEA/SH complaints have been officially reported through this channel. This contrasts starkly with the insights from the "Together Towards a Safe School Environment" monthly survey and the "At your service" platform reports, which highlight the presence of such issues, suggesting underreporting. The discrepancy may stem from the hotline's non-anonymous nature and operational limits, such as restricted hours and capacity, hindering effective reporting.

#### **Ongoing Consultancy for Assessing the Existing GRM System at MoE**

The World Bank, and under the current PforR is supporting a consultancy assignment to assess the existing system GRM system at MoE with the following objectives:

- Assess the effectiveness, efficiency, accessibility, and transparency of the existing GM systems at the MoE, including INSAF platform (uptake channels, handling procedures, existing infrastructure, etc.).
- Prepare a list of recommendations with the proposed solutions to enhance the performance of the existing GM system at the MoE to be discussed with the Ministry to agree on the preferred option.
- Develop the Scope of Work lay-out of the preferred option for GM system enhancement after agreement with MoE.
- Prepare Standard Operating Procedures (SOPs) / Manual for handling complaints based on the agreed option with MoE

The assignment is still underway, and all the deliverables will be used under the new proposed PforR.

***Recommendations for GRM Improvement:***

The team has identified the following recommendations to improve the MoE GRM, notably:

1. **Boost Anonymity and Confidentiality in Reporting:** Expand anonymous reporting options across all channels, including hotlines, to foster the reporting of sensitive issues such as sexual harassment or discrimination. Maintaining confidentiality during the complaint resolution process is essential to establishing trust within the GRM. This enhancement, aligned with the systemic review mentioned previously, aims to increase the reporting of sensitive issues by significantly influencing a complainant's decision to report. Guaranteeing anonymity and confidentiality is expected to enhance the GRM's use, offering a more secure environment for individuals to voice concerns without the fear of backlash, stigma, or privacy invasion. Such improvements will create a more reliable and encompassing grievance mechanism, addressing a wider range of issues and thereby elevating the responsiveness and trustworthiness of the system towards meeting stakeholder needs.
2. **Automate Complaint Management Processes:** Shift from manual to automated processes for classifying and managing complaints to reduce time inefficiencies and errors.
3. **Conduct Comprehensive Data Analysis:** Implement mandatory analytical approaches to utilize complaint data effectively for continuous improvement. Also Fill the existing gap in complaint data analysis, particularly with detailed demographic insights, to enable the MoE to tailor responses and policy improvements effectively.
4. **Leverage Complaint Data in Strategic Planning:** Ensure the integration of complaint data into strategic planning and operational improvements. Foster collaboration between the Complaints Directorate and other critical directorates, such as Quality Assurance, to inform the selection of schools for evaluation visits and address concerns based on accurate stakeholder feedback.
5. **Mandate Grievance Mechanisms for the WB Programs:** This may include applying new GRM SOPs under WB projects.
6. **Tackle the Underreporting of Sensitive Issues:** The MoE should enhance its grievance redress mechanisms to address the significant underreporting of sensitive incidents such as violence, GBV, and SH/SEA. This enhancement includes upgrading hotline functionalities, extending service hours to accommodate all potential reporters, and most crucially, instituting guaranteed anonymity for complainants. Implementing these measures will increase reporting rates and lead to a more comprehensive understanding and effective resolution of these critical issues. Furthermore, integrating and meticulously analyzing survey data and direct complaints will enable the MoE to develop targeted, gender-sensitive interventions, thereby strengthening educational environments' overall safety and inclusivity.

**The Grievance Redress Mechanism (GRM) for the proposed program will be instituted by the MoE and operationalized through the Donors Coordination Unit (DCU).** The MoE, along with the Vocational Training Corporation (VTC) and the Technical and Vocational Skills Development

Commission (TVSDC), responsible for the three key Result Areas (RAs), will be required to channel all program-related complaints directly to the DCU. This approach ensures a cohesive and efficient grievance redressal process. The DCU will act as the central hub, coordinating with the VTC and TVSDC to gather all grievances lodged by the public and stakeholders concerning the project. It is recommended that the DCU Project Management Unit (PMU) appoints a dedicated GRM Focal Point to oversee the project's GRM. Similarly, it is advisable for the VTC and TVSDC to designate their GRM Focal Points within each agency participating in the program. The primary GRM Focal Point in the PMU will be responsible for compiling the project's GRM reports, which are to be submitted to the Bank on a semi-annual basis.

## V. Recommendations and Actions

Based on the above assessment, the following measures are proposed under the proposed Program activities to address the gaps between the national and sub-national E&S management systems and the core principles of Policy on Program-for-Results Financing. These measures ensure adequate mitigation of E&S impacts and risks associated with the proposed Program's activities.

### 5.1 Recommendations Added to the PAP

**Table 6: E&S Proposed PAP Actions**

Action Description	Source	DLI#	Responsibility	Timing	Completion Measurement
1. Strengthening of the E&S capacities of the PMU/DCU by assigning qualified E&S staff (E&S Focal Point) to oversee the E&S aspects of program implementation and provide them with adequate training on E&S risk management and reporting as needed.	E&S	DLI 1, 4, 5	MOE	October 2024	<ul style="list-style-type: none"> <li>- Recruit or assign a qualified E&amp;S Specialist within the DCU</li> <li>- Assign E&amp;S Focal Points in TVSDC and VTC</li> </ul>
2. Inclusion of the E&S requirements including environmental, health, and safety (EHS) measures, including a Code of Conduct (CoD) for workers in the standard bidding documents (SBDs) for school expansion and rehabilitation and	E&S	DLI 1, 4, 5	MOE TVSDC VTC	12 months from Effectiveness	<ul style="list-style-type: none"> <li>- Inclusion of E&amp;S in bidding documents related to expansion, refurbishment, rehabilitation and maintenance</li> <li>- Development of workers Code of Conduct (CoC)</li> </ul>

refurbishment works of other facilities, including TVET and all other documents that are related to carrying out civil works.					
3. Initiate policy dialogue with the Ministry of Labor (MoL) and the Ministry of Social Development (MoSD) to prepare an action plan to address child labor risk.	<b>E&amp;S</b>	<b>All DLIs</b>	<b>MOE</b>	<b>Six months from Effectiveness</b>	- Development of child labor action plan
4. Incorporation of OHS, public health and safety, environmental and social safeguarding and sustainability, and climate change and action topics in the vocational training curricula and training materials, and in counselling and career guidance.	<b>E&amp;S</b>	<b>DLI 4 &amp; 5</b>	<b>MOE TVSDC VTC</b>	<b>12 months from Effectiveness</b>	Related topics are incorporated into curricula and training materials
5. Implement the Land Acquisition SOPs that are being developed under the current P4R for any expected land acquisition or expansion requiring land acquisition as needed.	<b>E&amp;S</b>	<b>DLI 1, 4, 5</b>	<b>MOE VTC</b>	<b>12 months from Effectiveness</b>	Land acquisition SOPs prepared, adopted, and implemented
6. The Ministry of Education (MoE) must support the development and implementation standard operating procedures (SoPs) aimed at effectively tackling incidents of gender-based violence (GBV) both within and in the vicinity of school facilities.	<b>E&amp;S</b>	<b>All DLIs</b>	<b>MOE</b>	<b>12 months from Effectiveness</b>	SOPs, prepared, adopted, and implemented
7. The Ministry of Education must develop and execute a comprehensive stakeholder engagement strategy that	<b>E&amp;S</b>	<b>DLI 6, 7, 8</b>	<b>MOE</b>	<b>Six months after Effectiveness</b>	Stakeholder Engagement Strategy developed, disclosed, and implemented

includes MoE staff across all levels, parents, and students in shaping and rolling out the new governance framework for the education sector.					
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## 5.2 Recommendations to Be Added to The Program Operation Manual (POM)

1. The MoE, under RA1 and RA2, must prepare, adopt and incorporate resources efficiency standards into the designs and tender documents of the planned construction/extension, additions, rehabilitation, maintenance, and modernization of schools, workshops, additional classrooms, etc. and for the purchase and use of supplies (furniture, equipment, tools, machinery, electronic devices, etc.) under the Program.

## 5.3 Recommendations Added to DLI Verification

1. The technical design specifications of the PPP model will make reference to the Quality Assurance System (QAS) to be developed under the program and any other applicable E&S requirements to be verified by the Program verification process. **(DLI 2)**
2. Institutionalizing environmental and social risk management within the new proposed structure of the future Ministry of Education and Human Resources (MEHR.) **(DLI 6 & 7)**
3. Strengthening the capacities of the Crisis and Risk Management Section at MoE for managing social risk management (SRM) through technical assistance to be provided under the IPF Component of the program. **(DLI 1, 2, 4, 5, and 7)**
4. The MoE should implement policies to extend kindergarten access to all children, including non-Jordanians and those with disabilities. This includes amending existing regulations to include non-Jordanian children and enhancing infrastructure and training to accommodate children with a range of disabilities. **(DLI 1)**
5. The MoE must implement inclusive and unbiased criteria for VT program expansion and counselling, focusing on equitable access for underrepresented groups and students from remote, disadvantaged areas. This may entails subsidizing transportation, increasing vocational schools in underserved regions, improving access for students with disabilities, and improving capacity and availability of counsellors. **(DLI 4)**
6. Given the existing strategic objectives within the gender strategy’s action plan 2023-205, that are yet unimplemented, the recommendation to reinforce actions under the gender plan, especially with a focus on the risks identified **(DLI 4)**, would be:
  - **Immediate Implementation of Gender-Responsive Analysis:** Fast-track the execution of gender-responsive analyses within the vocational education system to identify gender gaps and disparities promptly. This analysis should directly inform curriculum development, teaching methods, and career counselling approaches to ensure they meet the diverse needs and interests of all students.

- **Enhanced Training for Career Counselors:** Intensify training programs for career counsellors, incorporating the latest gender-sensitive methodologies and insights from gender-responsive analysis. Ensure these training programs are mandatory and include assessments to measure counsellors' understanding and application of gender-inclusive practices.
- **Active Promotion of Non-Traditional Pathways:** Launch targeted awareness campaigns that specifically promote non-traditional career paths to both students and parents. These campaigns should highlight success stories of individuals excelling in fields unconventional for their gender, using various media platforms to maximize outreach and impact.
- **Monitoring and Evaluation Mechanisms:** Establish robust monitoring and evaluation mechanisms to track the effectiveness of the implemented gender-sensitive practices within vocational education. This should include feedback loops from students, parents, and educators to continuously refine and adjust strategies to achieve the desired gender balance in vocational education management and participation.
- **Partnership with Industry and Community Leaders:** Forge strategic partnerships with industry leaders and community influencers to advocate for and support the integration of gender balance within vocational education. These partnerships can provide practical opportunities for students to explore non-traditional careers and create a supportive community ethos that champions gender equality in vocational choices.
- **Policy Advocacy and Guidelines Update:** Advocate for policy revisions and updates to existing guidelines that govern vocational education, ensuring they are explicitly aligned with gender equality goals. Policies should mandate the inclusion of gender-sensitive approaches in all aspects of vocational education, from administration and curriculum development to career guidance and student assessment.



## Supporting Annexes and Reference Documents

### Annex I: Reviewed Resources

#### Legislations:

1. [Constitution of the Hashemite Kingdom of 1951 with Amendments through 2011](#)
2. Education Law No. (3) of 1994
3. VTC law No. 11 of the year 1985
4. Technical and Vocational Skills Development Commission Law No. 9 of the year 2019
5. [Environment Protection Law No. 6 of 2017](#)
6. [Environmental Classification & Licensing Regulation No. 69 of 2020](#)
7. [Inspection Law 33 of 2017](#)
8. [ASEZ Law and its amendments No. 32 of 2000](#)
9. [Regulation for the Protection of the Environment in the Aqaba Special Economic Zone No. \(21\) for the Year 2001](#)
10. [Law amending the Labor Law No. \(10\) of 2023](#)
11. [The General Buildings Law 9/1993](#)
12. [Waste Management Framework Law No.16 of 2020.](#)
13. [The Public Health Law No. 47 of 2008 \(amended\)](#)
14. Jordan Labor Law # (8) of 1996
15. Amendment of Jordan Labor Law # (14) of 2019
16. [Child Law No. 17 of 2022](#)
17. [Jordanian Education Law No. \(3\) of 1994 and its amendments](#)
18. [The Law for Protection from Domestic Violence No. 15 of 2017](#)
19. [Rights of Persons with Disabilities Law No. \(20\) of 2017](#)
20. [Juvenile Law No. \(32\) of 2014](#)
21. [Guiding Manual for Combating violence and sexual harassment in the workplace 2019](#)
22. [Real Estate Law No. \(13\) of 2019 and amendments thereto \(Year 2023\)](#)

#### Policies and strategies documents:

1. [Jordan Economic Modernization Vision](#)
2. [Public Modernization RoadMap](#)
3. Jordan National TVET Strategy (JNTS) (2023-2027)
4. VTC Strategic Plan 2020 – 2022

#### Other Resources:

1. Grievance Mechanism (GRM) Assessment and Strengthening, a report by the World Bank 2022.
2. Work-Based Learning in Jordan, UNESCO, 2018
3. TVET Country Profiles UNESCO Amman,2019
4. The Jordanian Work-based learning model - Skills Development for Employment of Syrian Refugees and Vulnerable Jordanian Youth, Qudra 2 Project, (2022)
5. Jordan - Second Education Reform for the Knowledge Economy Project (English)

6. Jordan - Seventh Education Project (English)
7. National HRD Strategy 2016-2025
8. The 10-Year Strategy for Inclusive Education Based on the Text of Article (18/ h) of the Law on the Rights of Persons with Disabilities (20) of the Year 2017
9. [State of Skills - Country briefs. ILO.](#)

## Annex II: Stakeholder Mapping Matrix

Stakeholder	Internal/ External	Role in Project	Interest in Project	Relevant Area
Ministry Of Education (MoE)	Internal	Implementer	Enhancing educational quality across all levels, from KG2 through grade 12.	Result Area All
Vocational Training Center (VTC)	Internal	Implementer	Enhancing the quality of Vocational Training to improve access and ensure its relevance to the labor market.	Result Area 2
Technical, Vocational, and Skills Development Corporation (TVSDC)	Internal	Implementer	Enhancing the quality of Vocational Training to improve access and ensure its relevance to the labor market.	Result Area 2
Queen Rania Center (QRC)	Internal	Implementer	Enhancing the quality of Vocational Training to improve access and ensure its relevance to the labor market.	Result Area 2
Ministry of Environment (MoEnv)	External	Environment Protection	Enforcement of national environmental regulations Licensing and permitting investments, infrastructure construction and civil works as governed by applicable regulations. Environmental inspection Potential Role: advising on incorporation of environmental safeguards, sustainability and green growth into educational and training materials	Result Area 1 and Result Area 2
Aqaba Special Economic Zone Authority (ASEZA)	External	Environment Protection	Enforcement of national environmental regulations Licensing and permitting investments, infrastructure construction and civil works as governed by applicable regulations. Environmental inspection Potential Role: advising on incorporation of environmental safeguards, sustainability and green growth into educational and training materials	Result Area 1 and Result Area 2
The Ministry of Public Works and Housing (MoPWH)	External	E&S	Engaged in the infrastructure of MoE buildings and schools	Result Area 1 and

				Result Area 2
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### Annex III: Stakeholders Consultation Meetings During ESSA Preparation

Target stakeholders	Topic of consultation	Date
Assessment Directorate	Areas 1 and 2	18.03.2024
TVSDC	Area 2	19.03.2024
VTC	Area 2	19.3.2024
Inclusive Education Directorate	Areas 1 and 2	21.03.2024
Complaints and Grievances Division	GRM	21.03.2024
Planning and Educational Research Directorate/ School Map & GIS	Areas 1 and 2	24.03.2024
Vocational Education and Production Directorate	Area 2	24.03.2024
Buildings and International Project Directorate - Land Acquisition	Areas 1 and 2	24.03.2024
Buildings and International Project Directorate – Building Division	Areas 1 and 2	25.03.2024
Buildings and International Project Directorate - Maintenance	Areas 1 and 2	25.03.2024
Education Management Directorate - Early Childhood Education	Area 1	26.03.2024
Human Resources Directorate	Area 3	26.03.2024
Public Private Partnership Division	Area 1	26.03.2024
Education Quality and Accountability Unit	All Areas	26.03.2024
Education Counselling and Training Directorate	Area 2	27.03.2024
Gender Division	All Areas	28.03.2024
Crisis and Disaster Management Division	All Areas	03.04.2024



## Annex IV: CSOs Stakeholders consultations Key findings

The topic of consultation / message	Key discussions Outcomes – CSOs Consultation Session 7 April 2024
Consultation and Engagement of CSOs and stakeholders - All RAs	<p><b>Stakeholders' Engagement and Consultation:</b></p> <ul style="list-style-type: none"> <li>▪ The crucial role of involving stakeholders in MoE's program planning was emphasized, noting the impact on students, parents, and educators.</li> <li>▪ Challenges in current engagement methodologies include inadequate adherence to participatory approaches, repetitive involvement of familiar faces rather than broad-based stakeholder engagement, and a lack of systematic monitoring and evaluation.</li> <li>▪ Social accountability was underlined as essential for aligning MoE actions with legal standards and stakeholder expectations.</li> <li>▪ The potential of CSOs to enhance MoE's engagement efforts was recognized, given their expertise and outreach.</li> <li>▪ Risks associated with stakeholder engagement were acknowledged but deemed outweighed by the benefits of inclusive participation and shared responsibility.</li> </ul> <p><b>Coordination of Efforts:</b></p> <ul style="list-style-type: none"> <li>• The fragmented nature of current education programming efforts and the absence of impact evaluation mechanisms were noted as areas needing improvement.</li> </ul>
<b>RA 1. Home to school: Improving early learning and foundational skills for learning</b>	<ul style="list-style-type: none"> <li>▪ There has been a noticeable decline in education quality and outcomes in recent years.</li> <li>▪ The Covid-19 pandemic significantly affected education quality and student learning.</li> <li>▪ Many students require enrollment in programs designed to address learning losses incurred during the pandemic. In Palestinian refugee camps, one CSO's assessment revealed that not only typically underperforming students but also those who usually excel academically are in need of additional teaching programs, indicating a universal impact.</li> <li>▪ Persons with disabilities (PWDs) should be fully integrated into the education system, with efforts focused on creating an inclusive educational environment. This entails improving school infrastructure to accommodate their needs and providing specialized training for teachers.</li> </ul>

	<ul style="list-style-type: none"> <li>▪ Enhancements to the education system should be inclusive, considering the diverse geographical challenges and the specific needs of vulnerable groups.</li> </ul>
<p><b>RA 2. School to work: Improving access to and labor market relevance of TVET</b></p>	<ul style="list-style-type: none"> <li>▪ There is an overarching concern regarding the equitable access to vocational training (VT), particularly in governorates, necessitating thorough investigation to ensure inclusivity.</li> <li>▪ The PETEC system marks a positive step in vocational education but faces significant scalability challenges due to limited awareness among communities and an existing stigma that VT is intended for students with lower academic achievements.</li> <li>▪ VTCs are in dire need of staff enhancement to address the current predominance of administrative skills over technical capabilities. This issue is compounded by insufficient educator numbers and inadequate facilities, which negatively impact the quality of vocational education.</li> <li>▪ The reputation of VTCs suffers within the community, largely due to perceptions of poor control and governance, associating these centers with less desirable outcomes. Efforts to improve governance, control, and educational environments are essential for altering these perceptions.</li> <li>▪ Rebranding VT is crucial to attract students with strong academic records and to challenge the stereotype that VT is a fallback option. This requires curriculum improvements, better educational environments, and stronger links with the private sector.</li> <li>▪ Gender considerations and the inclusion of persons with disabilities (PWDs) are critical for creating an inclusive vocational education framework. Efforts should focus on enhancing the reputation of these centers among conservative communities and ensuring accessible education and training for PWDs.</li> <li>▪ Strategic alignment between the locations of VTCs and the specific demands of both local and international labor markets is necessary. This alignment could be achieved through mapping exercises to ensure that vocational training meets the needs of the job market, thereby improving employment prospects for graduates.</li> <li>▪ Success stories from vocational education should be highlighted to motivate the community towards VT, showcasing the opportunities it provides both within Jordan and internationally.</li> </ul>
<p><b>RA 3: Strengthening governance and management of the education system</b></p>	<ul style="list-style-type: none"> <li>▪ Financial and administrative reforms within the education sector might encounter resistance from educators, similar to past experiences where changes, such as modifications to the promotion system, were met with pushback. Resistance is often amplified by uncertainty and a lack of awareness regarding the reforms. This could potentially affect community cohesion and escalate tensions within the education system. Historical instances in Jordan where teachers have protested or halted</li> </ul>

	<p>educational processes due to policy or legislative disagreements underscore the importance of considering potential resistance in current reform efforts.</p> <ul style="list-style-type: none"><li>▪ There's a pronounced need to enhance decentralization in the education system, empowering directorates and schools with greater autonomy over financial and administrative decisions.</li><li>▪ A comprehensive review of legislation impacting centralization is crucial to facilitate a shift towards greater decentralization.</li></ul> <p>Nepotism and individual malpractices currently burden the system. It could also be a potential risk of a decentralisation approach. Therefore, establishing a robust monitoring and evaluation system is essential to prevent such practices within the educational framework. This aspect should be a priority in any reform initiatives to ensure integrity and efficiency in implementing educational policies and practices.</p>
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## Annex V Screening of Potential Environmental and Social Benefits

DLI	Environmental Benefits	Environmental Risks	Social Benefits	Social Risks
<b>Cross-Cutting Risks</b>	<p>The Program forms opportunity for incorporating environmental, climate change and green economy concepts into vocational training can help raising environmental awareness and developing students' skills connected to environmental priorities (e.g. OHS, green investments and technology, resources efficiency, pollution prevention, etc.). This will improve the capacity of their employees in priority sectors to better address relevant environmental risks and impacts, and</p>			<ul style="list-style-type: none"> <li>▪ The risk of implementing interventions without sufficient social impact assessment and input from or consideration of the communities they aim to serve, leading to resistance or failure to meet community needs.</li> <li>▪ Insufficient mechanisms for monitoring social impacts or integrating feedback, which could prevent the timely identification and mitigation of social risks.</li> <li>▪ The risk of lack of stakeholder engagement along the planning and implementations of interventions</li> <li>▪ Lack of screening of TVET curricula for E&amp;S risks and impacts.</li> </ul>

	capturing opportunities linked to green economy and cleaner production.			
<b>RA 1. Home to school: Improving early learning and foundational skills for learning</b>				
DLI 1. Increasing access to KG	No foreseeable environmental benefits	Risks related to OHS, public safety (especially pupils in KGs), and waste generation and management connected to possible poor environmental management of construction and civil works within KG's.	<ul style="list-style-type: none"> <li>Increasing access to education for more children will promote inclusivity and long-term societal advancement.</li> </ul>	<ul style="list-style-type: none"> <li>Risks related to land acquisition or encroachment on lands due to expansion in ECE classrooms.</li> <li>Weak safety and protection for children inside the classrooms constructed.</li> </ul>
DLI 2. Strengthening the quality of early childhood education	Potential benefits linked to resources efficiency, and climate change and action (energy and water efficiency, water conservation, waste segregation, etc.) through incorporating related standards and priorities into KG classroom minimum standards, curriculum and quality assurance system.	No foreseeable environmental risks or effects	<ul style="list-style-type: none"> <li>Enhancing early learning quality will foster cognitive, emotional, and social development in young children.</li> </ul>	<ul style="list-style-type: none"> <li>Potential risks related to workers (including OHS, SEA/SH, etc.)</li> <li>Exacerbates social inequalities by potentially the program not being accessible to all, widening disparities.</li> <li>Risk of neglecting GBV and (SE/SH) in system improvements for the targeted age group of children.</li> <li>Risk of bullying among students.</li> </ul>
DLI 3. Improving foundational literacy and numeracy skills	Potential benefits from raising environmental awareness among young students, and	No foreseeable environmental risks or effects	<ul style="list-style-type: none"> <li>Improving foundational literacy and numeracy will improve children's future success and critical thinking development.</li> </ul>	

	consequently positively embed environmental concessions and vocabulary in the culture of new generations. This can be achieved through incorporating environmental vocabulary and content addressing priority environmental issues in the curricula and materials.			
<b>RA 2. School to work: Improving access to and labor market relevance of TVET</b>				
DLI 4. Creating, expanding, and funding pathways from TVET to further education and to the labor market	Improving vocational training graduates' environmental knowledge and skill to enroll in current and emerging business sectors, including green jobs like materials recovery and recycling industries, resources efficiency industries, etc. Incorporation of OHS, environmental and climate change and action topics in the vocational training program will contribute to gradually reduce OHS and environmental risks within the industrial and handcraft sectors and will stimulate graduate students to employ their gained knowledge and experience to innovate solutions to contribute to business profitability and environmental	Risks connected to construction, civil works, and supplies, including OHS, public health and safety (including students, teachers and adjacent communities), and waste generation and management. These risks are likely to occur due to possible lack of compliance with the environmental safeguard requirements governed by the national environmental regulations and good environmental practices linked to construction and civil works.	<ul style="list-style-type: none"> <li>▪ Increasing flexibility in TVET qualifications will enhance job mobility and access to further education.</li> <li>▪ Improving transition rates to higher education will contribute to linking TVET more closely with tertiary level vocational programs.</li> <li>▪ Supporting vocational training with direct pathways to employment will strengthen the labor market relevance.</li> </ul>	<ul style="list-style-type: none"> <li>▪ Potential for increasing educational disparities, with students from lower socio-economic backgrounds having less access to these improved pathways.</li> <li>▪ TVET programs may reinforce gender stereotypes if not designed for equality.</li> <li>▪ Enhanced services risk excluding learners with disabilities and those in remote areas, or from poor backgrounds.</li> </ul>
DLI 5. Enhancing access to labor			<ul style="list-style-type: none"> <li>▪ Boosting the number of TVET graduates in sectors critical to the</li> </ul>	

market relevant TVET	responsibility through resources efficiency and cleaner production. This can also positively contribute to vocational training attractiveness to students by offering labor market relevant qualifications and credentials on the above-mentioned topics, and accordingly contribute to achieving DLR 4.2.	Risks connected to the operation of the training workshops and facilities, including risks and impacts associated with the generation and management of waste (including hazardous waste), OHS, and public health and safety (including students, teachers, and adjacent communities). These risks are likely to occur due to lack of (or weak) environmentally conscious TVET licensing and provisions, noncompliance with environmental regulations, safeguard standards and good international practices, and due to absence of (or weak) environmental monitoring in vocational training facilities and operations. Impacts and effects of such risks may vary depending on which “priority sectors” will be targeted by the Program to be aligned to labor market demands and the green economy.	economy will align education with market needs. <ul style="list-style-type: none"> <li>▪ Revising training program accreditation to meet labor market demands will ensure graduates are job-ready.</li> <li>▪ Enhancing teacher training in BTEC curricula will improve the quality of vocational education.</li> <li>▪ Increasing certification levels for TVET providers</li> </ul>	<ul style="list-style-type: none"> <li>▪ Students’ safety and incidents risks related to practical learning and inside workshops.</li> <li>▪ Risk of neglecting Gender-Based Violence (GBV) and Sexual Exploitation and Harassment (SE/SH) in system improvements for the targeted age group of children.</li> <li>▪ Risk of bullying among students.</li> <li>▪ Risk of student dropout and disengagement from the curriculum, compounded by students missing school to support their families due to poverty.</li> </ul>
<b>RA 3: Strengthening governance and management of the education system</b>				
DLI 6. Implementing the new governance structure of	The DLI offers the opportunity to stimulate and maintain environmental capacity and function within the MoE. Establishing environmental division of unit will improve the ministry environmental performance, enhance education sector climate action and	No foreseeable environmental risks or effects	<ul style="list-style-type: none"> <li>▪ Enhancing policy coherence and administrative efficiency in education will potentially lead to more equitable educational opportunities.</li> </ul>	<ul style="list-style-type: none"> <li>▪ Structural changes could lead to temporary disorientation among educators, students, and parents, affecting the learning environment.</li> </ul>

the education sector	response, promote environmental education into the education system, and raise environmental awareness about environmental and climate change priorities among substantial portion of the Jordanian community.			<ul style="list-style-type: none"> <li>▪ Efforts to professionalize and streamline the education sector might overlook the needs and preferences of local communities, risking a one-size-fits-all approach that does not serve all students well.</li> <li>▪ Inadequate resources to improve counselling and career guidance might potentially widen the gap between students in different regions or from different socioeconomic backgrounds and limit access for vulnerable groups.</li> <li>▪</li> </ul>
DLI 7. Promoting counselling and career guidance	Incorporation of OHS, environmental and climate change and action topics in the vocational training, counselling and career guidance will contribute to gradually reduce OHS and environmental risks within the priority sectors and will stimulate graduate students' innovation to contribute to business profitability and environmental responsibility through resources efficiency, green technologies and cleaner production. Incorporation of such labor market relevant qualifications and credentials will positively contribute to vocational training attractiveness to students, and to achieving DLR 4.2.	No foreseeable environmental risks or effects	<ul style="list-style-type: none"> <li>▪ Improving access to quality career guidance will supporting students in navigating their educational and career paths more effectively.</li> <li>▪ Encouraging informed decision-making among students will foster a workforce better aligned with market needs and personal aspirations.</li> </ul>	
DLI 9. Strengthening financial, procurement and human resources management in the education sector	No foreseeable environmental benefits	No foreseeable environmental risks or effects	<ul style="list-style-type: none"> <li>▪ Promoting inclusivity and adaptability in learning through digital platforms will prepare students for the digitalized global economy.</li> <li>▪ Supporting high-quality teachers will improve student learning experiences and outcomes</li> </ul>	

	No foreseeable environmental benefits	No foreseeable environmental risks or effects	<ul style="list-style-type: none"><li>Increasing transparency and accountability in financial management will potentially lead to more equitable distribution of educational resources.</li></ul>	
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## Annex VI: General Regulations Applicable to the PforR in Environmental and Social Matters.

No.	Law/Bylaw/Policy	Description
1.	Jordan Constitution	Articles 19 and 20 of the Jordanian Constitution address educational rights and regulations. <b>Article 19</b> allows religious congregations to establish and run their own schools for their members, with the stipulation that these schools must adhere to the law's general provisions and government control regarding their curricula and orientation. <b>Article 20</b> stipulates that elementary education is compulsory for Jordanians and must be provided free of charge in government schools.
2.	Education Law No. (3) of 1994 and its amendments.	<p>Education in Jordan is governed by the 1994 Education Act No. 3, which was amended in 2006 and 2013. This law identifies the objectives and policies of the education system in Jordan, and the responsibilities and functions of national stakeholders, as follow: <b>Article (6)</b>: Establishes the MoE's responsibility for creating and managing government educational institutions of all types and levels, ensuring they are staffed with qualified personnel and equipped with the necessary educational materials. <b>Article (7-8)</b>: Emphasizes the MoE's role in providing suitable buildings for educational purposes, aligning with educational policy, and overseeing private educational institutions to ensure compliance with the law. <b>Article (9-10)</b>: Focuses on encouraging student activities across various fields to achieve educational objectives, providing appropriate health and guidance care, and enhancing the relationship between educational institutions and their local communities.</p> <p><b>Article (11)</b>: Outlines the objectives of early childhood education, aiming to provide a balanced development for children to foster healthy habits and positive attitudes towards school and social relations. <b>Article (12)</b>: Specifies that the MoE is responsible for establishing kindergartens within its capabilities and organizing the technical and administrative affairs of kindergartens as per ministerial instructions. <b>Article (13-14)</b>: Defines the goals of basic education to develop citizens in various aspects of their personality and states that basic education is compulsory and free in government schools. <b>Article (15)</b>: Details the secondary education phase, focusing on providing students with specialized cultural, scientific, and professional experiences based on their abilities and interests. <b>Article (16-17)</b>: Discusses the structure of secondary education, including comprehensive and vocational tracks, and the criteria for student acceptance into secondary education.</p> <p><b>Article (18-19)</b>: Sets the organizational structure for the MoE, requiring administrative units and departments for efficient operation and staff numbers proportional to the student and teacher population. <b>Article (20-21)</b>: Establishes Education Directorates in each governorate and district to oversee educational</p>

		<p>success and development, with qualifications for department heads, technical members, and educational supervisors detailed. <b>Article (22-23):</b> Stipulates qualifications for educational supervisors and school directors, emphasizing the need for educational qualifications and experience. <b>Article (24-25):</b> Mandates educational counselors to have specific degrees in educational guidance or psychology and outlines the formation of local education committees to contribute to educational development.</p>
3.	Child Rights Law No. (17) of 2022	<p>The Child Rights Act No. 17 of 2022 includes several key articles focused on the educational rights and protections for children: <b>Article (16)</b> mandates the Ministry of Education (MoE), in coordination with relevant entities, to prevent school dropouts and ensure quality education through the provision of trained teachers and counselors. It also emphasizes the importance of child development and health awareness programs, tailored to the children's age and understanding and in alignment with religious and social values. <b>Article (17.A)</b> requires educational institutions to involve children and their guardians in decisions concerning school policies and the children's academic status. <b>Article (17.B &amp; C)</b> obligates educational institutions to protect children's dignity by prohibiting all forms of violence, including physical punishment, humiliation, and bullying, and establishes mechanisms for reporting and addressing such incidents.</p> <p><b>Article (21)</b> strictly prohibits all forms of child abuse, exploitation, neglect, and economic exploitation, requiring professionals in various sectors, including education, to report any incidents to relevant authorities. The Ministry of Social Development is tasked with monitoring these cases to ensure the welfare of the child within the family environment. <b>Article (25)</b> guarantees children with disabilities the right to general education and integration into educational institutions, with the Ministry of Education and relevant bodies required to provide necessary accommodations and accessible education. If general education is not feasible, alternative educational arrangements must be provided that cater to their needs and ensure accessibility. <b>Article (26)</b> ensures that children with disabilities are entitled to vocational training and rehabilitation suited to their age and needs, promoting equal employment opportunities and personal development. In cases where the nature of the disability demands it, specialized vocational training and rehabilitation programs must be provided in appropriate institutions or rehabilitation centers, which should be conveniently located or accessible to the children.</p>
4.	Rights of Persons with Disabilities Law No. (20) of 2017	<p>The law outlines several key articles related to access to education and vocational training, emphasizing inclusivity and accommodation for individuals with disabilities: <b>Article (17)</b> prohibits exclusion from educational institutions based on disability, mandates the Ministry of Education to provide suitable alternatives for individuals who cannot be accommodated in their preferred institutions, and forbids automatic failure or passing of students with disabilities based on their condition. <b>Article (18)</b> outlines the Ministry of Education's responsibilities, including integrating educational needs of persons with disabilities into policies,</p>



		<p>ensuring their admission and enrollment, providing necessary accommodations, revising curricula to include disability rights education, and ensuring accessibility in all educational institutions. <b>Article (19)</b> details the creation of standards for educational diagnosis, early intervention, curriculum development, and teaching methodologies for students with disabilities, aimed at maximizing their academic potential and inclusion in education.</p> <p><b>Article (20)</b> sets qualification requirements for professionals in educational diagnosis and special education, mandating them to enhance their qualifications within two years and outlining the Ministry of Education's role in licensing and supervising educational institutions for people with disabilities. <b>Article (25)</b> forbids discrimination against individuals with disabilities in employment or vocational training, requiring the Ministry of Labor and the Vocational Training Corporation to ensure inclusion in technical and vocational education and training programs. <b>Article (41)</b> involves religious authorities in promoting the rights of persons with disabilities, including revising religious curricula to incorporate diversity and respect for disability rights, combating stereotypes, and ensuring religious communications are accessible to persons with disabilities.</p>
<p>5.</p>	<p>Juvenile Law No. (32) of 2014</p>	<p>The establishment of the Family Protection Department dates back to 1997, and through the creation of a department, it began its work in 1998. In 2003, the Family Protection Department became an independent department. In 2011, the Juvenile Police Department was established and began work in 2012.</p> <p>In 2014, Juvenile Law No. 32 was issued, which is considered a modern law that keeps pace with ambitions and achieves the best interest of juveniles, it was launched in 2015, where it stipulated in its articles the establishment of a police department in the Public Security Directorate specialized in juveniles (Article 3/a) and gave the Department of Juveniles Juvenile police the power to settle disputes in violations , and the regulation for settling disputes in juvenile cases No. (112) for the year 2016, in addition to emphasizing in more than one place in the Juvenile Law on the best interest of the juvenile, especially (Article 4/a) that it takes into account the juvenile’s best interest, protection, rehabilitation and care. In 2021, the Juvenile Department was merged with the Family Protection Department to become the Juveniles and Family Protection Department.</p>
<p>6.</p>	<p><a href="#"><u>The Law for Protection from Domestic Violence No. 15 of 2017</u></a></p>	<p>outlines in articles 4 and 6 specific procedures and responsibilities concerning the reporting of domestic violence cases. Under this law, professionals across health, educational, and social services sectors, including teachers, are mandated to report any instances of domestic violence they become aware of, especially those involving individuals who are incapacitated or partially incapacitated. The law emphasizes the rapid response of the Family Protection Department to such reports, ensuring that all complaints or notifications received by various entities regarding domestic violence are forwarded to this department for appropriate action. When a teacher observes signs of domestic violence or is informed of such an incident, they are required to report this to the Family Protection Department, initiating a process that includes detailed recording of the incident, necessary</p>

		<p>medical intervention for the victim if required, and measures to ensure the victim's safety. This legal framework ensures a coordinated response to protect victims and uphold their rights, while also safeguarding the confidentiality and safety of those reporting the violence.</p>
7.	Real Estate Law No. (13) of 2019	<p>Real Estate Law No. 13 of 2019, has been published at the national gazette in 2019 to replace different laws including Land Acquisition Law No.12 of 1987. The aim of this law was to create a stable legal framework for the real estate sector that comprises 60% of fixed assets in the country, and directly impacts the national economy. This new law will have economic and social benefits that previous laws have not considered including incentivizing investments in the real estate sector. However, for the land acquisition process, the major differences between the previous law and the new one is to define properly the time frame for implementing the acquisition transactions, and to expedite the compensation process.</p>
8.	Guiding Manual for Combating violence and sexual harassment in the workplace 2019	<p>In 2019, the Ministry of Labor in Jordan developed a guiding manual that delineates the forms and nature of violence and sexual harassment within workplace settings. This manual not only defines these issues with precision but also catalogues their various forms, clarifying the commitment required from employers to prevent and address such unacceptable behaviours.</p> <p>Employers are presented with a framework for preventive action and response protocols, while employees are guided on their role in maintaining a work environment free from harassment. The document emphasizes the enforcement role of labor inspectors, ensuring adherence to the established standards. The manual addresses the development and implementation of both preventive and corrective strategies to combat workplace violence and harassment. It concludes with legal references of the Violence and sexual harassment. The guiding Manual is expected to be updated to reflect the new Labor law.</p>
9.	Environment Protection Law No. 6 of 2017	<p>The law empowers the MoEnv with key responsibilities, including the issuance of environmental licenses and oversight of establishments. The licensing process comprises screening for environmental risks and requiring an EIA or a Preliminary EIA by accredited consultants. MoEnv must also approve any activity modifications and is authorized to conduct environmental audits for compliance. This framework ensures robust environmental governance and risk mitigation.</p> <p>Pursuant to Law No. 6 of 2017 and its associated decrees, the framework for biodiversity and natural habitats in Jordan has been established. Currently, 12 Protected Areas (PAs) have been officially designated, while an additional seven are under evaluation for potential designation. Furthermore, the GoJ has proclaimed four Special Conservation Areas (SCAs) in accordance with the stipulations of Environmental Law 6/2017.</p>
10.	Environmental Classification &	<p>The amended Environmental Classification &amp; Licensing Regulation No. 69 of 2020 categorizes establishments and projects into four risk levels to guide</p>

	Licensing Regulation No. 69 of 2020	<p>environmental governance. High-risk entities necessitate a full EIA and licensing, while moderate-risk ones require a Preliminary EIA and licensing. Limited-risk activities need environmental approval for location but no EIA, and low-risk activities require neither approval nor licensing but must adhere to general environmental conditions. This stratification enables a tailored approach to environmental risk management.</p> <p>The Environmental Classification &amp; Licensing Regulation No. 69 of 2020 outlines a structured approach to environmental governance. It includes annexes that describe specific activities within four risk categories and mandates the formation of an EIA Committee at MoEnv. This committee is responsible for reviewing EIAs, Preliminary EIAs, and licensing requests. The regulation also provides guidelines on safe distances between development activities and residential areas, taking into account factors like wind direction and water resources. The committee has the authority to grant waivers to these guidelines and to upgrade a project's risk category. Consultations are only mandated for high-risk projects, and a range of stakeholders, from community leaders to academia, are involved. Environmental licenses are valid for five years and must include comprehensive EIA and PEIA requirements.</p> <p>For existing facilities, an Environmental Audit is required under specific conditions, governed by 2014 instructions. The institution must commit to a mitigation plan backed by a bank guarantee once the audit is approved.</p>
11.	Inspection Law 33 of 2017	<p>The Environmental Inspection Department at MoEnv oversees projects across all four EIA categories, irrespective of whether they have undergone an EIA/PEIA. Coordination with other inspections is facilitated by Inspection Law 33/2017, which integrates various inspection processes in Jordan to eliminate redundancies. Decrees like 110/2018 outline inspection procedures, while Decree 113/2018 specifies the qualifications required for inspectors.</p> <p>The regulatory system classifies economic activities based on their E&amp;S risk levels, dictating the extent of environmental assessment needed—comprehensive, preliminary, or screening. It also lays out guidelines for environmental audits and inspections. Inspectors must adhere to specific requirements, such as maintaining data confidentiality, avoiding conflicts of interest, upholding integrity, and not hindering the facility's economic activities during inspections. MoEnv further specifies that inspectors should possess a relevant university degree, have between 3 to 7 years of experience depending on seniority, and complete training courses that enhance both managerial and technical skills.</p>
12.	ASEZ Law and its amendments No. 32 of 2000	The ASEZ follows its environmental regulations as specified in Decree 21/2001. This decree outlines the EIA system in ASEZ, waste management protocols, standards for emissions, ambient air, noise, and the protection of natural habitats.
13.	Regulation for the Protection of the Environment in the Aqaba Special	In the ASEZ, the Environmental Regulation Directorate administers environmental regulations, a function otherwise performed by MoEnv in the rest of the country. Decree 21/2001, specific to ASEZ, categorizes projects into three risk-based categories, akin to Decree 69/2020. Both decrees necessitate full EIAs for Category

	Economic Zone No. (21) for the Year 2001	1 projects and Preliminary EIAs (PEIAs) for Category 2. However, ASEZ's Category 3 does not require any environmental assessment, diverging from the requirements under Decree 69/2020. Stakeholder consultations in ASEZ are limited to Category 1 projects, similar to Decree 69/2020. Furthermore, Decree 21/2001 sets out conditions under which environmental audits can be initiated, such as in response to complaints or pollution incidents, and mandates that these audits be conducted by a third-party entity approved by the Directorate.
14.	Law amending the Labor Law No. (10) of 2023	<p>The law serves as the foundational legal framework for managing employer-employee relations. It delineates both the obligations and rights of the employee and the employer. Specifically, it obliges employers to ensure a safe working environment, adhere to an appropriate code of conduct, and provide welfare benefits. Relevant regulations are:</p> <p>Regulations for Health, Safety, and Environment (HSE) Committees: Regulation No. 7 of 1998 mandates each establishment to constitute an HSE Committee responsible for overseeing the establishment's HSE performance. The regulation also prescribes the committee's composition, including the number of members and their respective roles and responsibilities, contingent on the establishment's employee count.</p> <p>Medical Care and Occupational Disease Prevention: Regulation 42/1998 focuses on preventive and therapeutic medical care for workers. It outlines the responsibilities of employers in offering medical services to safeguard workers from occupational diseases and to provide appropriate treatment where necessary.</p> <p>Risk Management in the Workplace: Regulation 43/1998 stipulates measures to protect workers from mechanical, electrical, and chemical hazards in the workplace. This regulation is instrumental in defining the protocols for occupational risk management.</p> <p>Labor Inspection Standards: Regulation 56/1998 governs the work of Labor Inspectors, specifying their qualifications, responsibilities, and the procedures they must follow. This regulation establishes the criteria and operational guidelines for Occupational Health and Safety (OHS) inspectors.</p>
15.	The General Buildings Law 9/1993	The Law outlines requisite provisions for structural stability across various constructions, encompassing buildings, roads, and bridges. The law mandates the formation of a committee tasked with developing engineering codes. These codes aim to govern the design, construction, supervision, maintenance, and operation of structures to ensure public safety. Concerns related to hazardous chemicals and wastes have been previously incorporated within the E&S assessment system.
16.	Waste Management Framework Law No.16 of 2020.	Framework Law for Waste Management No. 16 of 2020 regulates waste management under the jurisdiction of the Ministry of Environment. The legislation mandates waste generators to employ waste reduction, reuse, and recovery techniques. Residual waste must be processed and disposed of according to environmentally approved protocols (e.g. MoH to regulate management of healthcare waste). The Law calls for the establishment of a High Guiding Committee for Waste Management, comprising representatives

		<p>from line ministries. This committee is responsible for approving the national waste management plan, associated policies, action plans, and legislation.</p> <p>Key regulations under this Law include:</p> <p>Decree 68 of 2020: Specifies procedures for obtaining hazardous waste management permits. It outlines requirements for the segregation, storage, transport, treatment, and disposal of hazardous waste, including detailed protocols for disposing of hazardous substance containers.</p> <p>Decree 85 of 2020: Calls for the implementation of a waste tracking information system. This system is mandated to include data on waste quantities (exceeding 1,000 tons/year for non-hazardous waste or any quantity for hazardous waste), transfer stations, landfill leachate, gas emissions, and waste handling facility operators.</p> <p>The Electrical and Electronic Waste Management Instructions of 2021, issued by the MoEnv on 16th February 2021, became effective as of mid-August 2021. Annex 1 of the Instructions enumerates a comprehensive list of covered electrical and electronic equipment, which includes large and small household appliances, IT and telecommunications gear, consumer and lighting equipment, and an array of other specific categories such as medical devices and batteries.</p>
17.	The Public Health Law No. 47 of 2008 (amended)	<p>Article No. 4 states that the Ministry of Health is the competent authority accountable for the protection of public health in the country. It is also responsible for monitoring the water and food quality to ensure its safety and adequacy for human consumption.</p> <p>Under Item F of Article 4 of the Public Health Law, the MoH is responsible, in coordination with the relevant authorities, for providing preventive health services to government, kindergarten and kindergarten students and securing and providing health services as it deems appropriate for non-governmental schools and kindergartens or requiring their owners to provide these services under the supervision of the Ministry.</p> <p>Article No. 18 of the Public Health Law authorizes the director, government doctor, or any authorized employee who has the right to inspect any real estate or house if suspected of having a contagious disease, and the authorized persons has the right to cleanse that property and take all measures to reduce the spread of infectious disease. The same article clarifies that the Ministry of Health is responsible for taking the necessary measures to prevent the spread of diseases, including monitoring public and private water sources, crops, and any food or other sources that could constitute potential means of transmission of the infection. Articles 19 to 29 of the law further clarifies the roles and responsibilities linked to the prevention and control and treatment of epidemics, pandemics, and vector-borne diseases.</p>
18.	The Law of Technical and Vocational Skills Development Commission, number 9 of 2019	<p>The Law in its Article 3: A) “The commission of the Technical and Vocational Development is established by this law, where it enjoys an independent legal, financial, and administrative status. The commission shall have the right to proceed with all legal acts, in addition to own properties to achieve its goals, including contracting, accepting donations, and litigation.” “The Commission shall be responsible for: 1- Approve, accredit the institutes, entities provide vocational</p>

		<p>trainings, monitor their activities, organize their work, evaluate, and regulate their programs. The commission is only responsible for the vocational-technical trainings that are not related to educational degrees. The commission monitor the below programs: - Vocational secondary school. - Vocational training programs. - Continuous training programs. - Any other training programs newly created. 2- Determine the standards, requirements of admission. 3- Set the curriculum, creating programs according to the needs of the sectors. 4- Approve budgets. 5- Organize the vocational employment. 6- Register the qualifications of vocational training within the national framework of qualifications. 7- Monitor the exams, and the certificates of vocational training institutions. .... 13- determine the requirements, conditions, specification, licensing requirements should be fulfilled by training institutes. 14- issue licenses/ accreditations for training institutions at the private-public sectors.</p>
<p><b>19.</b></p>	<p>Vocational Training Corporation (VTC) Law No. 11 of 1985,</p>	<p>Under Article 3 of the Vocational Training Corporation (VTC) Law No. 11 of 1985, the VTC operates under the auspices of the Minister of Labor, enjoying a distinct legal, financial, and administrative autonomy. Article 4 delineates VTC's primary objectives, notably to provide accessible vocational training that equips a skilled workforce across various sectors, including Occupational Health and Safety (OHS) training. The 2019 internal guidelines on vocational training programs detail VTC's mandate to develop and implement training across three levels (Vocational Diploma, Skilled, and Limited Skills Programs) tailored to labor market demands.</p>