THE HASHEMITE KINGDOM OF JORDAN

Jordan People-Centric Digital Government

PROGRAM FOR RESULTS

(P180291)

ENVIRONMENTAL AND SOCIAL SYSTEMS ASSESSMENT (ESSA)

REPORT

February 2024

TABLE OF CONTENTS

ACRONYMS

ASEZ	Aqaba Special Economic Zone
ASEZA	Aqaba Special Economic Zone Authority
ATI	Access to Information
CSB	Civil Service Bureau
CSOs	Civil Society Organizations
DDoS	Distributed Denial of Service
DLI	Disbursement-Linked Indicators
DPI	Digital Public Infrastructure
DQA	Data Quality Audit
DTU	Digital Transformation Unit
E&S	Environmental and Social
HER	Electronic Health Record
EIA	Environmental Impact Assessment
EMP	Environmental Management Plan
EMR	Electronic Medical Records
ESF	Environmental and Social Framework
ESIA	Environmental and Social Impact Assessments
ESS	Environmental and Social Safeguards
ESSA	Environmental and Social Systems Assessment
GSC	Government Service Center
FGDs	Focus Group Discussions
GHG	Greenhouse Gas
GIZ	Deutsche Gesellschaft für Internationale Zusammenarbeit
GoJ	Government of Jordan
GRM	Grievance Redress Mechanism
HIE	Health Information Exchange
HIS	Health Information Systems
HSE	Health, Safety, and Environment
IT	Information Technology
ISMS	Information Security Management System
M&E	Monitoring and Evaluation
MoDEE	Ministry of Digital Economy and Entrepreneurship
MoE	Ministry of Education
MoEnv	Ministry of Environment
MoH	Ministry of Health
MoPIC	Ministry of Planning and International Cooperation
OHS	Occupational Health and Safety
Pas	Protected Areas
PAD	Program Appraisal Document
PDI	Indicators of the Program Development Objectives
PDO	Program Development Objectives
PforR	Programs for Results
PMDU	Prime Minister Delivery Unit
PMIO	Project Management and Implementation Office

PMO	Prime Minister's Office
PMU	Program Coordination and Management Unit
POM	Program Operation Manual
PWD	Persons with Disabilities
Ras	Results Areas
RSCN	Royal Society for the Conservation of Nature
SCAs	Special Conservation Areas
SG	Secretary General
SPAC	Service and Public Administration Commission
VG	Vulnerable Groups
WHO	World Health Organization

Executive Summary

Introduction

The World Bank prepared the Environmental and Social Systems Assessment (ESSA) according to the requirements of the Bank's Policy for Program for Results (PforR) financing for adequately managing the environmental and social (E&S) effects of the Program. The ESSA aims to ensure that the proposed People-Centric Digital Government Program is conducted in an environmentally and socially responsible manner, addressing potential risks and impacts, and enhancing E&S management outcomes. The findings and recommendations of the ESSA are subsequently factored into the operation's overall Integrated Risk Assessment, Program Appraisal Document (PAD), and Program Action Plan (PAP). The findings, conclusions, and opinions expressed in the ESSA document are those of the World Bank.

About Jordan People-Centric Digital Government Program

The proposed Jordan People-Centric Digital Government Program, in alignment with the Economic Modernization Vision, Public Sector Modernization Roadmap, and Digital Transformation Strategy, focuses on three proposed Result Areas (RAs):

1. **RA1: Improving service delivery through digitalization** – This area aims to enhance digital service delivery by strengthening digital identity and data sharing. It includes deploying electronic medical records (EMR) across healthcare facilities.
2. **RA2: Improving government effectiveness through digitalization** – This area involves professionalizing the civil service through competency-based recruitment and gender-sensitive promotion, digital skills development. It also includes the adoption of digital health standards, a functioning of multi-sectoral governance committee, and the upgrading of health information systems. The Ministry of Education (MOE) will also implement a digital Tawjihi exam and develop secondary teachers' digital skills.
3. **RA3: Improving transparency and accountability through digitalization** – This area focuses on enhancing public access to e-information, consolidating data for policy analysis and research, and establishing a national data quality audit framework for health data.

The Program would disburse based on the achievement of the proposed ten Disbursement Linked Indicators (DLIs) across these areas, as seen in table 1.

Table 1: Proposed Disbursement Linked Indicators (DLIs)

Area	DLI
Result area 1 on service delivery	DLI 1: Expanding trusted and inclusive access to people-centric digitalized services
	DLI 2: Increasing the inclusive adoption of people-centric digital identity
	DLI 3: Improving trusted, people-centric data sharing
	DLI 4 Digital transformation in health service delivery
	DLI 5 Professionalization of the civil service

Result area 2 on government effectiveness	DLI 6 Establishing digital health standards across a national Health Information Exchange (HIE)
	DLI 7 Digital student assessment
Result area 3 on transparency and accountability	DLI 8 Enhancing e-information
	DLI 9 Interactive statistical information
	DLI 10 Institutionalizing effective health data use

Methodology for preparing the ESSA Report

Conceptual Approach to Environmental and Social Screening: The Environmental and Social Systems Assessment (ESSA) for the proposed Program involves a structured, multi-step process to evaluate the possible E&S effects of the proposed Program:

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 the ESSA.
2. Assessing E&S risks against the PfoR E&S Core Principles: After preliminary screening, the remaining activities and related expenditure framework are evaluated against the core E&S principles for PforR financing. This step includes a comprehensive assessment of direct, indirect, induced, and cumulative impacts related to the Program's Development Objective, targeted results areas, overarching goals, and Disbursement-Linked Indicators (DLIs).
3. Evaluating Borrower's E&S Management Systems: This involves analysing the borrower's capacity to manage E&S risks under the proposed Program. The focus is whether the proposed Program's E&S management system is designed for sustainability, minimizes adverse impacts, and promotes informed decision-making. It also assesses the management of natural habitats, health and safety measures, land acquisition, cultural appropriateness, and conflict prevention.
4. Addressing System Gaps: Recommendations are made to strengthen the exiting borrower's E&S management systems and addressing identified gaps within these systems. The proposed recommendations are included in the Program Action Plan (PAP), DLI Verification Protocol, and the Program Operational Manual (POM).

Methodology and Stakeholders Consultation: The methodology of the ESSA encompasses a comprehensive document review of Jordanian legal and regulatory frameworks, ensuring alignment with E&S management standards. It also involves in-person meetings with key representatives from various institutions, which included the Ministry of Digital Economy and Entrepreneurship (MODEE), the Civil Service Bureau- CSB (the predecessor agency of the new Service and Public Administration Commission- SPAC), the Information Council, the Ministry of Education (MoE), the Ministry of Health (MoH), the Project Management and Implementation Office (PMIO) at the Prime Ministry Office (PMO), and the Hakeem Program, and the Department of Statistics at MOPIC. Furthermore, stakeholder mapping and consultation processes were conducted with non-governmental organizations, engaging with various agencies and international organizations such as the World Health Organization and local civil society organizations (CSOs). These consultations were crucial in identifying key social and environmental risks and understanding the context of the proposed Program's implementation.

Proposed Institutional Arrangements for the Implementation of the PforR

The Program leverages an existing institutional framework for the Public Sector Modernization and Digital Transformation Strategy, part of the broader Economic Modernization Vision. This framework involves three main government entities: PMO, MOPIC, and MODEE, each with overarching responsibilities. Each entity has specific responsibilities: the PMO manages the Public Sector Modernization Roadmap, MOPIC coordinates the EMV, and MODEE is responsible for the Digital Transformation Strategy. Each entity is entrusted with leading on specific areas under the Program and effective coordination among these entities will be achieved through a proposed technical steering committee and clear and agreed reporting mechanisms.

E&S Benefits and Risks Assessment

The overall screening of the environmental and social risks revealed that the E&S risks are Moderate. Summary information about these risks is presented below:

Environmental Benefits and Risks: The proposed Program is expected to bring various environmental benefits while addressing potential environmental risks. One of the key benefits includes reducing emissions and the carbon footprint, as the Program's emphasis on e-services is likely to reduce the need for transportation. Additionally, the shift towards paperless office operations is anticipated to lower resource consumption significantly. The Program also aligns IT procurement practices with energy-efficiency criteria, contributing to broader resource efficiency goals. Furthermore, the enhanced access to digital information is expected to aid in data-driven environmental planning and decision-making in the targeted sectors.

Regarding environmental risks, the proposed Program's reliance on the use of IT systems introduces potential challenges, particularly in e-waste management. As the Program necessitates the procurement and installation of various IT systems and supplies, a likely increase in e-waste generation is anticipated, especially during hardware replacement cycles. This increase could lead to the accumulation of e-waste in domestic landfills, posing risks of soil and water contamination due to heavy metals, which could negatively impact human and ecological health. Mitigation strategies for these possible risks include strengthening implementing agencies' compliance with the regulations and instructions related to e-waste management and initiating public awareness campaigns. While the Program is not expected to raise electricity demand significantly, it plans to enhance resource efficiency through energy-efficient IT hardware procurement and promote paperless operations. The proposed Program activities do not involve construction or civil works that could cause permanent environmental disruptions.

Social Benefits and Risks: The proposed Program is designed to yield significant social benefits but also faces potential adverse social risks and effects. On the positive side, adopting digital identity systems and electronic medical records is expected to dramatically increase accessibility to essential services, particularly for vulnerable and remote populations. This shift promises to streamline bureaucratic processes, reducing delays and enhancing efficiency. In healthcare, the transition to digital tools is anticipated to revolutionize patient care, enabling more effective preventive measures, and improving communication between healthcare providers. A key strength of the Program is its focus

on inclusivity, ensuring vulnerable populations are not marginalized but integrated into the broader service delivery framework.
Digital assessments in education are another highlight, offering advantages over traditional methods by reducing student stress and providing more flexibility and fairness in exam administration. Transparency is another critical area of focus, with digital auditing and data management expected to reduce fraud and corruption, potentially improving the economic landscape with growth in e-commerce and job creation. In the public sector, prioritizing skills and competency-based hiring will likely enhance fairness, transparency, and efficiency, contributing to a more diverse and inclusive work environment.

However, the Program also raises some social risks. The lack of comprehensive social assessments and stakeholder engagement might lead to policies that exacerbate social inequalities. Issues with integrity and transparency in civil service reform could diminish public trust. Similarly, inadequate communication about government digitalization initiatives might slow public uptake and limit their effectiveness. Gender-specific barriers and the absence of gender-focused communication strategies could hinder women's and people with disabilities' access to Program benefits. Data privacy and protection need to be carefully addressed under the 2023 Data Protection law, especially when collecting sensitive health data. Additionally, the risk of social exclusion in Program implementation, particularly for vulnerable groups, are significant concerns.

Legal and Institutional Framework for the Proposed Program and E&S Systems

Environmental: The environmental and public health regulatory framework in Jordan is well-defined, with responsibilities distributed across various government entities. The Environment Protection Law No. 6 of 2017 appoints the Ministry of Environment (MoEnv) as the principal authority for environmental protection, authorizing it to issue environmental licenses, oversee establishment inspections, and address significant pollution incidents. The amended Public Health Law No. 47 also assigns the Ministry of Health (MoH) to monitor water resources and cultivation, focusing on disease control and public health compliance, including overseeing wastewater networks and treatment plants. The Aqaba Special Economic Zone is an exception to these national laws, which follow its environmental regulations as per Decree 21/2001. This decree encompasses its own Environmental Impact Assessment (EIA) system and sets specific standards for waste management, emissions, ambient air, noise, and natural habitat protection, reflecting Jordan's commitment to tailored environmental governance within its varied regions.

Jordan's Environmental Impact Assessment (EIA) and Licensing Department operate efficiently despite its small size, managing a substantial workload focusing on prompt application processing and benefiting from international support for capacity building and gender sensitivity. However, there are still areas in Jordan's environmental management system that require improvement, including stakeholder consultation, enforcement capabilities of the Ministry of Environment (MoEnv), consideration of social aspects in impact assessments, addressing gaps in the legal framework for Strategic Environmental Assessments, the need for more transparency in EIA disclosure, and developers' allocation of adequate resources for EIA commitments. Addressing these issues is crucial for enhancing the effectiveness of Jordan's environmental management systems and ensuring comprehensive stakeholder engagement and adherence to environmental and social standards.

Social: The proposed program aligns well with international human rights standards and national legislative mandates. It aims to strengthen the country's legal and institutional framework for healthcare and education through digitalization while simultaneously enhancing mechanisms for citizen participation and the resolution of grievances. The GOJ has established several systems to manage and evaluate public performance and policy initiatives, notably the Government Performance and Achievement Follow-up System for the EMV[1]. The King Abdullah II Center for Excellence (KACE) supports this by fostering excellence and innovation, the Regulatory Impact Assessment guidelines updated in 2022, and MOPIC has developed a manual for impact evaluation of programs. However, further improvements could be made in capturing citizens' feedback and implementing government redress mechanisms (GRMs); further structuring of appeal mechanisms in public sector recruitment; enforcing Access to Information; and mainstreaming dedicated social and environmental assessments, and specialized personnel for overseeing E&S assessment, risk management and mitigation.

Program GRM: The proposed Program will be using the GOJ's "At Your Service" as the Program's proposed GRM system, in addition to the individual GRM systems of the different implementing agencies under the project. The At Your Service system is an interactive platform designed for public and government communication, offering categories for engagement such as asking questions, making suggestions, praising, lodging complaints, and reporting corruption. The proposed PMU, to be established in MOPIC, will liaise with implementing agencies under the Program to compile all possible complaints pertaining to the Program from the public and Program stakeholders. The proposed PMU would assign a GRM Focal Point, who would be tasked with managing the GRM of the Program, data gathering from the different implementing agencies, and GRM reporting to the World Bank.

Recommendations

Based on the above assessment, a series of recommendations are proposed under the proposed Program and would be incorporated as part of the Program's Action Plan (PAP), including:

1. E-waste management plan and Standard Operating Procedures (SOPs).
2. Conduct social impact assessments (SIAs) and stakeholder engagement processes for public sector reforms, in line with the guidelines on Regulatory Impact Assessment issued by the GoJ in 2022.
3. Strengthening of the E&S capacities of the implementing agencies for managing E&S risks and impacts.

I. INTRODUCTION

The proposed People-Centric Digital Government Program for Results (P180291) is being developed by the Government of Jordan (GOJ) with support from the World Bank. The proposed Program objective is related to people-centered improvement in service delivery, government effectiveness, and transparency and accountability. This Environmental and Social Systems Assessment (ESSA) report is prepared in alignment with the guidance provided for the management of potential Environmental and Social (E&S) effects within Programs for Results (PforR) by the World Bank.

The ESSA is framed in accordance with Operational Policy (OPS5.04-POL.107 of 2017) and Directive (OPS5.04-DIR.107 of 2022), and it strives to ensure that the proposed People-Centric Digital Government PforR is designed and implemented in a manner that maximizes potential E&S benefits while taking necessary measures to avoid, minimize, or mitigate E&S risks and impacts. This ESSA should be read in conjunction with the Program's Program Appraisal Document (PAD) to provide full details of the Program Design.

A legal analysis has been conducted to evaluate the legal and institutional frameworks applicable to the proposed PforR, ensuring it aligns with sustainability 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 People-Centric Digital Government PforR for a model that aligns with the core principles and planning elements stipulated by the World Bank.

1.1 Purpose of the ESSA

This ESSA has been prepared by the World Bank according to the requirements of the Bank's Policy for PforR financing for adequately managing the E&S effects of the 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 and identifies measures to enhance both the E&S management systems and the E&S outcomes during Program implementation. Program activities and the expenditure framework will be further screened against exclusion criteria including large scale land use conversion; child and forced labor; significant expansions of industrial facilities; large dams; and any other high-risk activity. 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.

1.2 Methodology

The preparation of the ESSA was carried out in a participatory manner involving feedback and inputs from the key and various stakeholders relevant to the sectors covered under the proposed PforR, including governmental institutions in the health, education, and public service; non-governmental organizations and international donor agencies supporting the digital transformation agenda of the country. The methodology employed for this analysis was devised to align with the unique context of Jordan and the activities underpinned by the PforR. The ESSA team gathered pertinent data and visited one of the Government Service Centers (GSCs). These findings will inform the World Bank's decisions on Program activities eligible for support under the proposed PforR. Subsequently, the data will guide the development of the PAP's E&S action plans, focusing on enhancing the Program's E&S management outcomes. The World Bank team has evaluated the extent to which the PforR Program Systems align with fundamental E&S principles.

The evaluation commences with identifying potential E&S risks and impacts, which involves discerning the conceivable E&S ramifications stemming from the activities included in the expenditure framework of the proposed PforR. After this, a multifaceted methodology was employed for the framework's development, encompassing the methods outlined below:

i. **Document Review**: The ESSA report is based, in part, on information obtained through an exhaustive examination of Jordanian laws, regulations, policies, strategies, requirements, and guidelines, focusing on E&S management to prevent or mitigate the identified risks. This review drew from official government websites and materials provided by the client, offering a comprehensive understanding of the relevant legal and regulatory framework. It also drew information and data from published media and web-based information. Annex I contain the inventory of documents examined.

ii. **In-Person Meetings with Government Representatives**: Conducted with relevance to the activities of the PforR, these included key Ministries such as the Ministry of Digital Economy and Entrepreneurship (MODEE), Civil Service Bureau (CSB), National Library - Information Council, Ministry of Education (MoE), Ministry of Health (MoH), MoEnv, the Project Management and Implementation Office (PMIO) at the PMO, and Hakeem Program.

iii. **Review of WB Documentation**: Including documents generated during the preparation of the PforR, such as the PAD and Aide Memoires.

vi. **Review of Other WB PforR Reports**: This included examining ESSA reports for other World Bank PforR operations and studies conducted in the context of these operations.

v. **Stakeholders Mapping and Consultation During ESSA Preparation**: The ESSA was prepared during August to September 2023 following the Pre-appraisal mission of the proposed Program. Engaging with other relevant agencies involved with the government in implementing aspects of the PforR, such as the Hakeem program, and consultations with international agencies engaged in supporting the Programs, such as the World Health Organization (WHO).

vi. **Focus Group Discussions (FGDs) with Civil Society Actors**: These discussions were conducted to seek input on key social and environmental risks and to understand the context of the activities' implementation, including perceptions of government performance.

vii. **Stakeholder Consultation Following the Preparation of the Draft ESSA**: The consultation session will be conducted on the draft ESSA before Program appraisal.

viii. **Preparation of the Final ESSA:** The final draft of the ESSA will consider the feedback and comments collected during the consultation session on the draft, with the final version to be disclosed by the government on the designated websites followed by disclosure by the World Bank.

Final Consultation on the ESSA Report: On 19th February 2024, the E&E team held a final hybrid session to share the findings and recommendations of the ESSA report. Relevant government agencies connected to the program and CSOs active in the field attended the session. Stakeholder feedback validated the ESSA findings and emphasized the importance of implementing its recommendations to ensure the program's sustainability and impact.

Consultation and Disclosure: The preparation of the ESSA included stakeholder mapping of consultations and inputs from implementing agencies and key stakeholders relevant to the program, including governmental institutions, the implementing agencies, CSOs, and international donor agencies supporting the digital transformation of the government. The Bank, its representatives, and the Program's implementing agencies consulted with stakeholders on the Draft ESSA and findings in February 2022. The consultation outcomes have been considered in the assessment process, and relevant significant concerns have been considered in the ESSA and recommendations. The final ESSA will be disclosed on the Bank and MOPIC websites, incorporating stakeholders' feedback, before appraisal.

1.3 Stakeholder Mapping and Consultation During Preparation of the ESSA

The ESSA was formulated between August and September 2023, utilizing a combination of face-to-face consultations and FGDs with relevant stakeholders, including all implementing agencies, integral to the Disbursement-Linked Indicators (DLIs) as outlined in Annex II and Annex III provide the meetings that have been conducted and Annex IV provides a comprehensive record of these consultations, delineating how stakeholder input has been assimilated.

II. PROGRAM DESCRIPTION

2.2 The Government Program

The structure of the government program, under the umbrella of the proposed Program, is defined at the convergence of three key strategic plans: the Economic Modernization Vision, the Public Sector Modernization Roadmap, and the Digital Transformation Strategy, spanning 2021-25. The GoJ officially adopted this framework in August 2022 as part of the Economic Modernization Vision 2033, serving as the primary governmental framework. These plans are supported by the Public Sector Modernization Roadmap and the Digital Transformation Strategy for 2021-25, both of which interlink and are likely to be prolonged past their initial end dates following a thorough evaluation.

The reform agenda addresses comprehensive objectives, including the enhancement of government service accessibility and quality, efficiency in government operations, and the promotion of transparency and accountability. Additionally, it focuses on specific sectors like education and health. In education, the aim is to integrate different education levels to better align the output of educational institutions with the skills demanded in the job market. In the health sector, the focus is on enhancing the management and oversight of healthcare services.

2.3 Program Description

2.3.1 Scope and Boundaries of the Program

The proposed Jordan People-Centric Digital Government Program will support the implementation of the Economic Modernization Vision, Public Sector Modernization Roadmap, and Digital Transformation Strategy over the specified period, with an emphasis on three key Result Areas (RAs) described below:

RA1: Improving service delivery through digitalization: Under this RA, the Program proposes to improve digital service delivery by strengthening DPI through the increased adoption of people-centric digital identity and the improvement of trusted, people-centric data sharing. It would also facilitate digital transformation in health service delivery by deploying electronic medical records (EMR) across all healthcare facilities.

RA2: Improving government effectiveness through digitalization: This area proposes to professionalize the civil service by enacting revised by-laws, mainstreaming competitive recruitment and competency-based promotion, promoting digital competency skills development, and supporting gender-sensitive promotion to leadership position. It would also work on establishing digital health standards across a national HIE, developing a multi-sectoral governance committee, publishing the HIE blueprint/roadmap, and upgrading health information systems (HIS) to develop and utilize Foundational registries. Additionally, the MOE would implement a digital Tawjihi exam by adopting a blended learning strategy, establishing digital assessment centers, training secondary teachers in digital skills, and facilitating the exam for both students and refugees.

RA3: Improving transparency and accountability through digitalization: Focusing on transparency and accountability, this RA proposes to enhance e-information. It would also consolidate statistical and administrative data into an integrated system for enhanced policy analysis and research support. Lastly, it would work on institutionalizing effective health data use by establishing a national data quality audit (DQA) framework and improving data quality.

The Proposed Program would disburse funds based on the achievement of the proposed ten Disbursement Linked Indicators (DLIs) across these three Result areas. The proposed DLIs reflect the strategic objectives the GoJ pursued through its governance reform program.

Program Boundaries:

The proposed Program, as outlined, advances critical government commitments in three main areas, focusing on digital transformation in the education and health sectors. Its approach is broad, emphasizing cross-sectoral governance reforms through digital government initiatives to enhance service delivery, efficiency, transparency, and accountability. This includes implementing trusted and people-centric e-services and e-identification, e-information, professionalizing civil service, and utilizing interactive statistical data and health quality data. Specifically, the Program addresses digitalization in secondary education exams and foundational digital transformation aspects in the health sector, anticipating future support to enhance health service access, quality, and public spending efficiency.

The results targeted by the Program are tracked through five proposed PDO-level indicators, with a four-year implementation timeline. The Program's reach extends nationwide.

Table 2: Proposed Program Boundaries

RA 1: Service delivery	RA 2: Government effectiveness	RA 3: Transparency & accountability
Expanding trusted and inclusive access to people-centric digitalized services	Professionalization of civil service	Fostering e-information
Increasing the inclusive adoption of people-centric digital identity	Digitalizing student assessment	Broadening access to interactive statistical data
Improving trusted, people-centric data sharing	Improving HIE	Enhancing health data quality standards
Enhancing medical record management		

2.3.2 Proposed Program Development Objective (PDO) and Results Indicators

The proposed Program Development Objective (PDO) is to improve people-centered service delivery, government effectiveness and transparency and accountability through digitalization.

PDO-level Indicators are:

Result Area 1 on service delivery through digitalization, PDO-level indicators are the following:

1. The number of individuals accessing digitalized public- and private-sector services using trusted, people-centric DPI, which is enabled by increasing the inclusive adoption of people-centric digital identity and improving trusted, people-centric data sharing.
2. The number of beneficiaries who actively use patient-centric digital services offered through myHakeem as an outcome of digital transformation in health service delivery.

Result Area 2 on government effectiveness through digitalization:

3. Increased student trust in the fairness of the general secondary education examination (Tawjihi) as an outcome of the digitalization of student assessment.
4. Increased representation of women in leadership positions in the civil service because of competency-based promotions and competitive recruitment.

Result Area 3 on transparency and accountability through digitalization:

5. Improved e-participation as an outcome of enhancing e-information and of interactive statistical information.

2.3.3 Proposed Disbursement Linked Indicators (DLIs)

DLIs are considered critical for the achievement of the PDO and the disbursement of funds. Table 2 presents a summary of these proposed DLIs:

Table 2: Proposed Disbursement Linked Indicators to PforR Disbursements

Area	DLI
Result area 1 on service delivery	DLI 1: Expanding trusted and inclusive access to people-centric digitalized services
	DLI 2: Number of individuals adopting people-centric digital identity.
	DLI 3: Availability of trusted, people-centric data sharing
	DLI 4 Digital transformation in health service delivery
Result area 2 on government effectiveness	DLI 5 Professionalization of civil service
	DLI 6 Establishing digital health standards across a national Health Information Exchange (HIE)
	DLI 7 Digital student assessment
Result area 3 on transparency and accountability	DLI 8 Enhancing e-information
	DLI 9 Interactive statistical information
	DLI 10 Institutionalizing effective health data use

2.3.4 Proposed Institutional Arrangements for the Implementation of the PforR

The Program leverages an existing institutional framework set up for the Public Sector Modernization and Digital Transformation Strategy, part of the broader Economic Modernization Vision. This framework involves three main government entities: PMO, MOPIC, and MODEE, each with overarching responsibilities. Each entity has specific responsibilities: the PMO for managing the Public Sector Modernization Roadmap, MOPIC for supporting the implementation of the Economic Modernization Vision (EMV), and MODEE for the Digital Transformation Strategy. Effective coordination among these entities is achieved through the Program Management Unit (PMU) in MOPIC, a technical steering committee and reporting mechanisms.

2.3.5 E&S Capacity of the Program Implementing Agency

The Program requires fortifying programmatic, environmental, and social (E&S) capacities across coordination and implementation layers. The Program Coordination and Management Unit (PMU) at the Ministry of Planning and International Cooperation (MOPIC) requires a holistic capacity, especially in Environmental and Social Safeguards (ESS). This encompasses Monitoring and Evaluation (M&E) with an emphasis on grievance management and the tracking of E&S mitigation actions including e-waste management, OHS, and public health and safety. Also, the stakeholder engagement to address E&S risks and to deliberate on mitigation strategies, which include themes of digital literacy, accessibility for PwDs and marginalized groups, tackling) all sorts of discriminations and harassment, and ensuring data privacy and effective communication.

E&S Key Appointments and Training Proposed for the Program: Onboarding of (1) E&S specialists, responsible for E&S assessments and stakeholder engagement to discuss and mitigate the E&S risks, including e-waste management, OHS (including incidents), and public health and safety, and (2) M&E specialists focused on grievance management, tracking E&S milestones.

Implementing Agency Capacity: Each implementing agency must assign a senior executive as the focal point, fully empowered to oversee implementation, coordinate with the PMU, and report on progress, challenges, and bottlenecks. As detailed in the Operational Manual, these focal points will receive specialized training in E&S, M&E, and stakeholder consultations from an E&S lens, within six months after Program effectiveness.

2.3.6 Physical Interventions of the Program for Results

In the framework of the proposed PforR, no major physical activities are anticipated. Furthermore, there are no foreseeable major IT infrastructure investments under DLI 1, DLI 2, DLI 3, DLI 6, DLI 8 and DLI 10. However, limited investments in IT systems are foreseeable under DLI 4, DLI 5, DLI 7 and DLI 9, as follows:

- Under DLI 4, it is proposed to supply and upgrade the IT equipment at facility level in the health sector. The supplies include Edge Firewalls (8 units), Core Firewalls (8 units), Core Switches (8 units), WAN Switches (8 units), Servers (24 units), SAN Storage (8 units), NAS storage (8 units). Hospitals IT infrastructure upgrade is assumed to require supply of access switches (160 units), wireless access points (700 units), and Firewalls /Router (50 units). The IT systems supplies and

works will be provided to 256 primary health care centers, 65 comprehensive healthcare centers, 3 specialized centers and 10 hospitals. The supplies include Personal Computers (9000 units), laser printers (3500 units), wristband printers (30 units), label printers (1500 unit), barcode scanners (4000 units), scanners (120 units), laptop on wheels (400 units), laptops (400 units), workstations (60 units), monitor 4MP (45 units), monitor 4MP (15 units), voice rec (60 units), CD burners (15 units), DI connectors (250 units) and servers (30 units). Please confirm or advise if otherwise.

- Under DLI 5, the Human Resources Management Information System (HRMIS) will be mobilized as it is, while its upgrading is considered by the Government to cope with the digitalization of civil service operations. Under DLI 7, and as explained in the MoE Exams Digitalization Plan, IT supplies will be needed to upgrade IT laboratories into examination rooms in school facilities and equip 19 exams centers distributed in all governorates, under the responsibility of the Tests and Examination Directorate in the Ministry of Education. Each exams center will constitute maximum of three exams rooms (total of 42 exams rooms across the country), and each room will include 78 exam terminals (approximately 3000 PCs), in addition to CCTV system, sounds system, air conditioning, 50 KVA UPS's, IT networks, and mobile jammers. Each exams center (total of 19) will also include a control room (servers, switches, CCTV control, sounds control system, etc.).
- Under DLI 9, the following IT hardware will be needed: Core Switches (2 units for HQ), Edge Switches 24 Ports (3 units), Edge Switches 48 Ports (33 units), Core Switches (2 units for Jabal Amman), Managed Access Points (16 units), Network Access Control (NAC) (2 units), Internet Edge Next Generation Firewall (2 units for HQ), Data Center Next Generation Firewall (2 units for HQ), Next Generation Firewall (2 units for Jabal Amman), Advanced WAF with Load Balancer (2 units) and Multi-factor Authentication (2 units).

2.3.7 Social Benefits of the Program

Based on the planned activities under the Program for Results (P4R), the three result areas are explicitly crafted to address improvements in accessibility, equity, quality, and relevance of digital services, aligning with human rights and social inclusion perspectives.

In the social sphere of service delivery, Result Area 1 proposed activities include: (i) Strengthening DPI: Enhancing digital identity aligns with citizens' right to identity and accessibility, fostering social inclusion; (ii) Promoting Access to E-services: Increasing access to municipal and refugee services ensures equitable provision and addresses gaps in opportunity and social equity; (iii) Digital Transformation in Health Service Delivery: the deployment of electronic medical record (EMR) platforms emphasizes the right to quality healthcare and supports more inclusive and efficient health service provision.

Under the banner of government effectiveness, Result Area 2 proposes: (i) Professionalization of Civil Service: Mainstreaming competency-based practices and digital literacy upholds the principles of transparency, efficiency, and equality in public service; (ii) Establishing Digital Health Standards: the creation of a HIE safeguards the right to health through better-informed decision-making and data sharing, recognizing the diverse needs of all citizens; (iii) Digital Student Assessment: mainstreaming

digital assessments in education supports the right to education, reflecting a commitment to modernization and equality in educational opportunities.

For transparency and accountability, Result Area 3 focuses on (i) Enforcing Access to Information. This adheres to the principle of transparency and the right to information, empowering citizens and enhancing government responsiveness; (ii interactive statistical information aligns with democratic principles, fostering an engaged citizenry and benefiting the decision-making and research on different domains; (iii) Institutionalizing Effective Health Data Use: Ensuring data quality upholds the right to health and enhances healthcare service provision.

These interventions together present a comprehensive strategy aimed at advancing social development. By recognizing and integrating the diverse needs of current and potential beneficiaries, with a focus on human rights and social inclusion, the Program seeks to overcome existing gaps in digital accessibility, quality, and equity, thereby contributing to significant social gains for all citizens.

2.3.8 Exclusion List

The Program does not anticipate yielding significant negative environmental or social impacts. According to the WB PforR policy, "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 the PforR Financing and are excluded from the PforR Program". Consequently, an exclusion list has been formulated to delineate the specific activities that shall not be permissible within the 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 leading to significant adverse impacts on 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 covering 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) have adverse impacts on land and natural resources subject to traditional ownership or under customary use or occupation.

III. PROGRAM'S ANTICIPATED ENVIRONMENTAL AND SOCIAL EFFECTS

3.1 Conceptual Approach to Environmental and Social Effects

The ESSA process systematically assesses the Program's E&S effects. The first step, elaborated in Section 3.1.1, is a screening of Program activities applying the exclusion criteria to eliminate activities that are not eligible for PforR financing. The second step is to screen eligible activities for potential E&S effects against the core E&S principles. This is elaborated in Sections 3.2 and 3.3. The activities include those defined in the Program of expenditures or activities required to meet the PDO, results areas, goals, and DLIs. Screening identifies not only direct impacts, but also any indirect or induced Program impacts—that is, effects that may arise from activities that are not necessarily proposed for PforR financing but are a foreseeable result of the PforR financing and those arising from activities associated with the Program.

An assessment of the borrower's systems to manage E&S risks associated with Program activities is provided in Section 4, while recommendations to address system gaps are provided in Section 5.

While the definition of E&S effects includes benefits, known impacts, and potential risks, the primary emphasis of the ESSA is to determine the extent to which the borrower's systems can manage the adverse impacts and risks. Predominantly, factors affecting E&S risks can be classified into two broad categories: (i) Sustainability and institutionalization of E&S systems and (ii) risks related to pollution, health and safety, culture heritage, natural habitats vulnerability issues, social inclusion, and equal accessibility to benefits and the interaction between these factors may multiply or minimize overall program risk.

3.1.1 Environmental and Social Screening

The assessment of E&S risks is Moderate. The Program is expected to have several positive E&S benefits in public service delivery, government efficiency and effectiveness, and transparency and accountability, in addition to lowering (marginal) emissions and reducing the carbon footprint associated with service delivery by targeted sectors. The Program is also expected to have some direct adverse E&S risks and impacts, including the generation of e-waste, and impact on vulnerable groups (VG) full benefit from the Program. Their E&S risks and impacts will be assessed and mitigated in line with the relevant laws of Jordan and the core principles of the Bank Policy on Program for Results Financing.

The screening criteria are applied for the activities that fall within the boundaries of the PforR and are directly supported by DLIs/DLRs. Those activities are either included in the expenditure framework of the PforR or need to be implemented to fulfill the requirements of different DLIs.

3.2 Potential Positive and Negative Environmental Risks Effects

This section outlines the potential environmental risks and benefits identified through the screening conducted by the Environment and Social (E&S) team. For a comprehensive analysis of the potential environmental impacts, please refer to Annex V of this report.

3.2.1 Potential Environmental Benefits

The proposed Program's activities are expected to deliver various environmental benefits. Specifically, by encouraging e-services, the Program aims to lower emissions and reduce the carbon footprint associated with superfluous transportation. A shift toward paperless office operations promises to decrease resource consumption in resource management. Similarly, applying energy-efficiency criteria to IT procurement practices is aligned with broader resource efficiency goals. Moreover, enhanced access to digital information is expected to bolster data-driven environmental planning and decision-making processes in the targeted sectors. In addition to these advantages, the proposed Program presents a valuable opportunity to address the risks from and improve the national capacity for e-waste management.

3.2.2 Potential Adverse Environmental Risks and Effects

E-waste Risks: The proposed Program's activities necessitate procuring or making use of IT systems by some of the implementing entities. Anticipated to generate e-waste at the inception and throughout its lifecycle—likely during hardware replacement cycles every five years—the Program focuses on installing "soft" digital infrastructure such as computers, switches, and routers in addition to hardware infrastructure. The Program does not include construction or civil works connected to the establishment of IT infrastructure. The uptake of digital services will likely prompt consumers, including citizens and refugees, to acquire modern electronic devices, resulting in a slight acceleration in e-waste generation beyond current trends. Noting weak enforcement of e-waste related policies and regulations, and the insufficient investment in e-waste segregation and recycling, e-waste is anticipated to accumulate in domestic landfills and dumpsites. Environmental risks associated with this e-waste include soil and water contamination due to heavy metals, with consequential negative impacts on human and ecological health. Mitigation strategies will entail strengthened regulatory enforcement related to e-waste management and public awareness campaigns.

Resource Efficiency Risks: The Program is not expected to significantly increase electricity demand for operating the requisite IT solutions, hardware, and electronics. Meanwhile, paper use in targeted sectors is projected to decline, aligning with the long-term goals for paperless operations. Resource efficiency risks will be mitigated, and benefits capitalized upon through energy-efficient procurement practices for IT hardware and electronics, and through the promotion of paperless operations for digitized services.

Construction and Civil Works Risks: The Program's activities are not projected to involve civil works or cause permanent environmental disruptions with adverse impacts.

3.3 Potential Positive and Negative Social Effects

This section outlines the potential social risks and benefits identified through the screening conducted by the Environment and Social (E&S) team. For a comprehensive analysis of the potential environmental impacts, please refer to Annex VI of this report.

3.3.1 Potential Social Benefits

The widespread adoption of digital identity systems, and E-medical records (DLIs 1, 2, 3 and 4) yields numerous interconnected advantages across different sectors. Key among these is an unprecedented increase in accessibility and convenience, enabling even the most vulnerable and remote populations to connect with essential services. Coupled with this is a marked improvement in efficiency, reducing bureaucratic delays, speeding up transaction times, and freeing up resources for more critical tasks. Specifically, within healthcare, the adoption of digital tools has led to an evolution in patient care, facilitating preventative measures, improving adherence to clinical protocols, and enhancing communication between providers.

The proposed Program's focus on the inclusion of refugees is a key strength. By extending digital identity access and earmarking portions of e-health services specifically for refugees. The proposed Program ensures that this significant demographic is not sidelined but rather integrated into the broader agenda for service delivery and public welfare. This inclusive approach is even more critical given that refugees utilize and contribute to the existing, often strained, social and physical infrastructure in Jordan.

Additionally, Digital student assessment (DLI 7) offers several advantages over traditional formats. They alleviate student stress by providing instant access to exams and results, offer greater flexibility with the option for multiple attempts, and simplify the exam administration process. A standardized item bank enhances fairness and minimizes cheating by generating multiple exam versions. Collectively, these benefits contribute to a more efficient, equitable, and psychologically accommodating exam experience.

A notable emphasis on transparency, through e-information, interactive statistical data and use of quality health data, enhances accountability while reducing fraud and corruption opportunities. The economic landscape is positively influenced, with growth in e-commerce and potential job creation, reflecting a broad economic benefit.

Prioritizing skills within the public sector has manifold implications for enhancing fairness, transparency, competence, and relevance, fostering an environment where diversity and inclusivity are respected (DLI 5). Focusing on clear criteria and competence-based hiring eradicates favoritism, creating an even playing field that fosters public trust and continuously motivates employees to improve their skills. Special attention to digital competencies keeps the sector relevant, significantly improves service delivery, and gives the government a competitive edge. The Public Sector Modernization Roadmap shall also contribute to enhancing gender equality by actively promoting the representation of women in leadership roles within government structures. This is achieved as a facet

of the broader civil service professionalization agenda, incorporating gender-sensitive career development strategies.

In healthcare, introducing a unified HIE improves providers' coordination through real-time access to patient data, reducing costs and ensuring standardization across systems (DLI 4. Transparency is enhanced, providing clear direction on goals, and representing varied interests. Finally, in the educational context, digital assessments (DLI 5) translate into quicker feedback and substantial cost savings, while the in-depth analysis they enable leads to targeted improvements in education quality.

Enhancing e-information and providing interactive statistical data enable easier access to relevant, up-to-date information, facilitating informed decision-making and public engagement. By making data more accessible and interactive, individuals and communities can better understand and analyze issues that affect them, promoting transparency and fostering a more participative society.

1.3.2 Potential Adverse Social Risks and Effects

1. **Inadequate Social Assessment, Geographic Consideration, and Stakeholder Engagement** (Applicable to all DLIs): The inadequacy of rigorous social assessments and inadequate stakeholder involvement, coupled with a lack to account for the specific needs of different demographics and geographic areas, constitutes a social risk. This oversight can result in policies that inadvertently exacerbate social inequalities or fail to mitigate significant social risks affecting VG such as women, elderly people, youth, refugees, and people with disabilities (PWD) or other marginalized communities. The lack of nuanced data and stakeholder input could also lead to implementing one-size-fits-all policies that ignore regional disparities and the unique needs of diverse communities. Consequently, public trust may be eroded, and social tensions could arise.

2. I**ntegrity, Transparency, and Communication in Civil Service Reform** (DLI 5): The effective professionalization of the civil service hinges on robust integrity and transparent processes. Failing to articulate these procedures transparently to current employees and potential candidates can diminish public trust. This lack of transparency can also lead to ad hoc decision-making, increasing the risk of nepotism. Inadequate management of this aspect could undermine the broader objectives of enhancing public sector efficiency, perpetuating the entrance of less-qualified candidates, and impeding the establishment of a fair and equitable system.

3. Furthermore, **insufficient promotion and disclosure of the reform plan** (DLIs 5) can escalate stakeholder resistance and tension. There is an opportunity to improve the understanding among various stakeholders, including Members of Parliament and high-level leadership, about the motivations for transitioning from the Civil Service Bureau (CSB) to the Service and Public Administration Commission (SPAC) to avoid undermining the reform's success.

4. **Awareness and access to information on government digitalization programs** (DLIs 1,2,3,4,6,7,9,10): insufficient communication about current government digital initiatives, such as the SANAD or the electronic medical record (EMR) programs and the upcoming student assessment tools, may erode public trust and acceptance. Poorly introduced or explained initiatives can lead to public resistance, limiting the effectiveness and uptake of these beneficial programs. This situation

presents an area for enhancing the communication gap, which currently leads to a less clear understanding and, as a result, a reduced adoption of e-services. Moreover, an opportunity exists to boost awareness within the public sector, where there is sometimes a reluctance towards change, often related to job security concerns. Addressing these fears is crucial for facilitating the smooth integration of various services. Improving communication is not only pivotal for increasing public engagement with e-services but also for positively impacting the internal dynamics within the public sector. It can reduce resistance to changes, alleviate concerns about job security, and promote seamless interoperability among different services. By focusing on these areas, it's possible to streamline service delivery and make it more efficient.

5. **Gender-Specific Barriers to Program Access and Benefits** (All DLIs): There are several areas where focused improvements could significantly enhance women's and PWDs' equitable access to Program benefits and workplace safety. Initially, the need for more detailed social assessments is evident, as their current lack disproportionately affects women by reinforcing systemic barriers and gender stereotypes, thus hindering the development of gender-sensitive policies. Additionally, ensuring the integrity of public-sector recruitment processes is essential to addressing gender imbalances and promoting equitable access for women. Moreover, addressing these integrity concerns within the workplace is critical to reducing the risk of harassment, violence and discrimination, and ensuring the availability of safe reporting mechanisms. Furthermore, integrating gender-focused communication strategies in digitalization efforts is crucial to mitigating these risks effectively. Addressing these areas is vital for the Program to truly embody inclusivity, build trust, and alleviate existing social tensions, thereby ensuring that it fully supports those it aims to serve.

6. **Data Privacy and Protection Risks** (DLIs 1,2,3,4,7,9): Vulnerabilities may exist in safeguarding personal data against unauthorized access or misuse within digital systems. Data manipulation and selective reporting are risky, particularly in performance metrics and financial disclosures. Ethical concerns further manifest in collecting sensitive health data from vulnerable cohorts, raising issues about informed consent, and potentially affecting their safety and security.

7. **Personal Data Protection Law.** Enacted in September 2023, Jordan’s Data Protection Law incorporates key principles recommended under international "good practice”. The legislation emphasizes key principles of data protection such as the legitimacy of data processing, purpose limitation, data accuracy, confidentiality, and the crucial role of data subject consent, ensuring conditions like specificity and alignment with processing purposes. It also outlines data subject rights and the treatment of sensitive data in line with international standards. However, it can be strengthened in some areas, such as incorporating a more explicit emphasis on the principle of data minimization to ensure that only necessary data is collected and to include provisions for privacy impact assessments to better identify and manage risks in data processing.

8. **Operational Continuity** (DLIs 1,2,4,7,9): The absence of robust backup mechanisms could result in data loss, undermining system reliability and potentially halting critical operations during system downtimes.

9. **Digital Inclusion** (DLIs 1,2,4,7,9): Inadequate digital literacy or resistance to technological adaptation may engender disparities in service accessibility.

10. **Risk of Potential Discrimination in Program Implementation (DLIs 1 and 4):** While the proposed Program has an inclusive approach, targeting both Jordanian citizens, non-Jordanians, and refugees, a risk of unintentional discrimination in delivering its services may exist. The Program must maintain an unequivocal commitment to inclusivity, ensuring no groups face discrimination in service delivery.

IV. Assessment of Environmental and Social Management Systems

4.1 Conceptual Approach to Social and Environmental Legal Analysis

An analysis of the legal and institutional aspects applicable to the PforR in preparation has been carried out to determine if:

1. The design of the Program's E&S management system promotes sustainability, seeks to avoid, minimize, or mitigate adverse impacts, and emphasizes informed decision-making relating to the Program's E&S effects.
2. The system ensures the avoidance of significant conversion or degradation of natural habitats and physical and cultural resources under PforR financing criteria.
3. 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.
4. 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.
5. The 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.
6. The system is designed to prevent the exacerbation of social conflicts, especially in areas identified as fragile, post-conflict, or subject to territorial disputes.

4.2 Relevant Environmental Management Systems for PforR

4.2.1 Legal Framework in Environmental Matters Relevant to the Program

Jordan's environmental and public health regulatory landscape is well-defined, 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.

- **Public Health Law No. 47 (amended)** states that the MoH monitors public and private water resources and cultivation, especially in spreading diseases or causalities. In coordination with other relevant governmental agencies, the MoH oversees wastewater networks and treatment plants to ensure their compliance with public health standards.
- ***It should be noted that these 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.

Table 5: General regulations applicable to the PforR in environmental matters

Law/Regulation	Description
Environment Protection Law No. 6 of 2017	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. 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.
Environmental Classification & Licensing Regulation No. 69 of 2020	The amended Environmental Classification & Licensing Regulation No. 69 of 2020 categorizes establishments and projects into four risk levels to guide 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. The Environmental Classification & 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. 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.
Inspection Law 33 of 2017	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. The regulatory system classifies economic activities based on their E&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.
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.
Regulation for the Protection of the Environment in the Aqaba Special Economic Zone No. (21) for the Year 2001	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 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.
Law amending the Labor Law No. (10) of 2023	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: • 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. • 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. • 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. • 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.

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.

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 from line ministries. This committee is responsible for approving the national waste management plan, associated policies, action plans, and legislation.
	Key regulations under this Law include:
	• 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.
	• 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.
	• 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.
	  • The Instructions mandate that electrical and electronic waste, inclusive of all accessories, components, and sub-parts, be disposed off exclusively at designated sites. Such waste is not to be co-mingled with household refuse. The document places a prohibition on the importation of e-waste and necessitates Ministry pre-approval for any export of such waste.
	  • Article 7 delineates the prerequisites for the lawful transport of electrical and electronic waste. It specifies the criteria for vehicles, containment, and documentation. Article 8 articulates the regulatory requirements for obtaining a permit to establish e-waste treatment facilities, including compliance standards and operational procedures.
	  • Producers of electrical and electronic waste are mandated to submit reports to MoEnv. These reports, to be formatted according to Annex 3, should detail the quantities and types of waste generated, as well as plans for its collection, treatment, or export. Producers are further obligated to minimize waste generation through adherence to best environmental practices. To facilitate this, a continuous contractual relationship must be maintained with certified waste treatment facilities and certified carriers for the waste in question

4.2.2 Institutional Frameworks for Environmental Management of the Program

In Jordan, the institutional architecture for environmental regulation and management of projects is led primarily by the MoEnv as guided by Law 6/2017 and Law 16/2020. The Ministry operates through specialized departments and committees that ensure environmental compliance and social safeguards in Program implementation.

The Environmental Licensing Department is the initial point of entry for project applications. 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.

In contrast, the ASEZ Access to Information is regulated by its Environmental Regulation Directorate under the Aqaba Special Economic Zone Authority (ASEZA), not by MoEnv.

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.

In compliance with existing regulations, the Program activities under discussion are classified as 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 Program must still consult MoEnv for environmental screening if activities fall under the first three project categories outlined in Regulation 69 of 2020. Additionally, the Program is obligated to comply with the Waste

Framework Law (Law 16 of 2020) and any pertinent regulations or instructions issued by the Ministry of Environment, including the Decree 68 of 2020, Decree 85 of 202, and the Electrical and Electronic Waste Management Instructions of 2021. The Program also needs to build the capacity of the implementing agencies and directly related stakeholders with regard to e-waste management, strengthen implementing agencies ' e-waste management systems, and raise public awareness.

4.2.3 Implementation of Environmental Management Systems

Environmental Licensing and EIA Process

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 as mentioned below. Approximately 30 comprehensive EIAs are performed annually in Jordan, bolstering a growing community of experts in government and consultancy sectors.

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 having a lean staff, 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.

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 waste disposal, dust, noise, and emissions non-compliance, 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.

E-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 database for hazardous materials and waste. 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.

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.

By integrating the findings from the Netherlands Commission for Environmental Assessment and considering the existing operational landscape, it is evident that while Jordan has made significant strides in environmental management, areas requiring improvement remain. Particularly, for stakeholder consultation, enforcement capabilities, and improved transparency.***Natural habitats and PAs***

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.

Administrative capabilities for overseeing PAs 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. 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.

Overall, the key areas of improvement within the implementation of environmental management systems include:

- Improve stakeholder consultation, particularly for Category 1 projects, to foster a comprehensive representation of impacted or interested parties in the Environmental performance of the project.
- Improve MoEnv's capacity for follow-up and enforcement of EIA requirements, . Also, increasing the workforce allocation to ensure effective compliance monitoring.
- Improving the consideration of social aspects, such as gender and vulnerability in the impact assessments, as its necessary for a complete evaluation of the project's implications

- Enhancing the current legal framework to mandate Strategic Environmental Assessments for large-scale developments to ensure early integration of E&S considerations.
- Improving transparency through mandated EIA disclosure to foster stakeholder engagement and trust.
- There is a need for developers to more effectively allocate human and financial resources to fulfill EIA or special condition commitments and recognize these as ongoing obligations rather than mere formalities for licensing.

4.3 Relevant Social Management Systems for PforR

4.3.1 Legal and Regulatory Framework for the Social Management of the Program

The principle of universal access to healthcare and education is enshrined as a fundamental human right[1], in line with the WHO's stance that a human rights-based approach in healthcare rectifies societal inequities, discriminatory practices, and imbalances in power that often perpetuate disparities in health outcomes[2].

In the context of Jordan, the nation has ratified numerous international human rights treaties under the aegis of the United Nations, including those that specifically pertain to the right to health and education. At the national level, the Jordanian Constitution endorses its citizens' right to healthcare and education. The state has the onus to ensure equitable access to quality healthcare and education, facilitated through public and private institutions, under conditions stipulated by the law.

The proposed digitalization program to be supported by the World Bank focuses on key sectors of health and education and specifically emphasizes enhancing citizens' participation and grievance mechanisms. This initiative aligns with Jordan's existing constitutional framework and international obligations, aiming to consolidate the state's endeavors in guaranteeing universal access to these crucial services.

Since the commencement of the 21st century, Jordan has systematically incorporated international human rights principles into its domestic legal framework. The emphasis has been on the eradication of discrimination, the augmentation of citizen participation, and the establishment of robust grievance redressal mechanisms that pertain to governmental entities. A comprehensive array of legislative enactments, institutional configurations, and procedural mechanisms have been put into place. These not only aim to democratize benefits across the populace but also priorities targeted interventions for VG—comprising refugees, children, the elderly, women, youth, and individuals with disabilities. Recent constitutional amendments in 2022 further consolidate this framework. Additionally, the legal infrastructure has been reinforced to facilitate public access to information and institutionalize the

[1] Universal Declaration of Human Rights. 1948. United Nations. Source: ttps://www.un.org/es/about-us/universaldeclaration-of-human-rights

[2] Health and Human Rights. 2022. World Health Organization. Source: https://www.who.int/news-room/fact-sheets/detail/human-rights-and-health

recognition of participatory governance, thereby ensuring that citizen voices are formally acknowledged.

The MoH, MoE, MoDEE, and other governmental departments involved in this Program must operate within this established legal framework. The framework stipulates specific parameters concerning the assurance and protection of rights, non-discrimination, citizen participation, public consultation, access to information, and avenues for filing complaints.

In summary, the proposed Program aligns well with both international human rights standards and national legislative mandates. It aims to strengthen the country's legal and institutional framework for healthcare and education through digitalization, while simultaneously enhancing mechanisms for citizen participation and the resolution of grievances. This regulatory framework is delineated in the table that follows:

Table 6: General regulations applicable to the Program for Results in social matters

No.	Law/Bylaw/Policy	
1	Jordan Constitution	Article 15 of the Jordanian Constitution safeguards freedom of opinion, permitting expression within legal bounds and granting citizens the right to petition public authorities. Article 20 makes basic education mandatory and free in state schools. The Constitution also commits to protecting the rights of individuals with disabilities, as well as those of women, children, and the elderly, advocating for their participation and protection against abuse and discrimination. These articles collectively provide a legal basis for civil liberties, social equity, and public participation in Jordan.
2	Cybersecurity Law No. 16 of 2019	The law establishes the National Cybersecurity Council and Center, reflecting a strong commitment to cybersecurity. The center has legal authority, including litigation rights, and oversees all aspects of national cybersecurity, including policy development, application, and monitoring. It has the right to conduct unscheduled inspections and mandates adherence to its security policies by all entities. The law emphasizes responsible data handling, continuous support, regular evaluations, collaborative data sharing, and risk management. It offers a comprehensive approach to tackle national concerns about privacy, security, and data
3	National Cyber Security Policy	The policy discusses the intricacies of the Information Security Management System (ISMS), focusing on its purpose, application, and establishment. Topics covered include the protection of live and portable data, electronic communications, storing information on the internet and hard drives, encryption methods, access control to data, mobile use of data and assets, and agreements surrounding confidentiality and non-disclosure. Additionally, there's an exploration of the ISO 27001 standard, which offers best practices for managing information security. The document also contains visual aids that help elucidate the cybersecurity policy framework and the lifecycle of portable storage devices.

4	Cybercrime Law No. 17 of 2023	The law is commendable in its firm stance towards privacy concerns and system protection, introducing stringent measures such as heavy penalties against unauthorized access, data interception, and other malicious activities. This has positioned Jordan as a strong deterrent to potential violators and a base for safeguarding electronic payment data and official information. However, the law could be strengthened in key areas, such as freedom of expression, citizen engagement, and the incorporation of innovative digital practices.
5	Law No. 24 of 2023 of Personal Data Protection	The was published on September 17, 2023, following the new Electronic Crimes Law. It mandates consent for personal data processing, which must be clear, written, with defined duration and purpose. Exceptions include public authority tasks, medical care, life protection, crime prevention, legal or court order compliance, Central Bank of Jordan tasks, scientific research, statistical or national security purposes, and publicly disclosed data. Key processing conditions include lawfulness, fairness, transparency, purpose limitation, accuracy, storage limitation, and integrity. Notably, the law lacks an explicit "data minimization" principle, common in international data protection laws. The law establishes a unit within the MODEE for monitoring compliance and drafting legislation. A Personal Data Protection Board, led by the Minister and comprising various representatives, is responsible for policy implementation, standards approval, issuing licenses, and handling complaints. Overall, the law aligns with international data protection standards, with specific adaptations for Jordan's context.
6	Public Health Law	The law states that any hospital or medical center must obtain authorization under the Public Health Law, adhering to its standards and regulations. The MoH oversees compliance.
7	Jordanian Medical Liability	The Jordanian medical liability clauses, as encapsulated in Articles 22, 23, and 24, stand as a robust legal shield, emphasizing the sanctity of patient privacy and precisely delineating the parameters under which this information can be disclosed. While these articles affirm the commitment to maintain confidentiality and articulate the legal boundaries, the transition to digitizing health records introduces a complex layer of risk. These risks are both technological and deeply social, encompassing potential loss of trust, stigma, discrimination, and broader public health concerns. The crux of the challenge lies in the interface between the well-intentioned legal framework and the vulnerability of electronic records to cyberattacks, unauthorized access, or inadvertent sharing. Inherent in this dynamic is a subtle tension between the aspiration for modernization and the imperative to preserve the core principles of medical confidentiality and trust. The current clauses, while robust in traditional contexts, may require

		further augmentation to unequivocally address the emerging risks associated with the digital age, ensuring that the legal structures remain resilient and responsive to the evolving landscape of healthcare delivery.
8	Jordanian Medical Association Law and its amendments, Law No. 13 of the Year 1972	The Law's articles touch upon the responsibilities and powers of the Medical Association Council, including the creation or modification of medical constitutions, the conduct of the profession, and disciplinary proceedings. Article 18 discusses the power of the general assembly based on the council's recommendations to establish or modify the medical constitution, create a code of professional conduct, and introduce any modifications to it. This indicates a foundation for ethical and professional behavior in medical practice and a participatory approach in reporting any needed amendments to protect the patient's interest and ensure doctors' conduct.
9	The Education Law	The law's Article 30 discusses the students' final class exams in the school, stipulating that decisions of the Ministry related to general examination procedures and results are final and not subject to challenge in any judicial or administrative forum. This provision creates potential areas of concern. By rendering the decisions related to digital exams unchallengeable, it effectively removes a safety valve or mechanism for students and educators to address legitimate concerns, errors, or discrepancies that may arise in a digital examination environment. Such issues as technical glitches, slow internet, false accusations of cheating, hacking incidents, or loss of exam data might go unaddressed. The social risks are significant and may undermine trust in the examination process, foster a sense of disempowerment among students, and permit unchecked errors or abuses. The complexity of this issue underscores the need for authorities to perhaps reconsider this provision, balancing the need for integrity and finality with fairness and responsiveness to the unique challenges of the digital age.
10	Modified bylaw for administrative organization for MODEE	The law's provisions for MoDEE delineate a comprehensive and authoritative role for the ministry in governing the country's digital landscape, directly influencing how social risks are managed or potentially arise. By entrusting MoDEE with the shaping of policy, provision of expert consultations, formulation of e-payment strategy, completion of the national optical fiber network, and the establishment of dedicated departments, the law places the ministry at the forefront of digital transformation. This centralized control ensures alignment with the national vision and offers a unified approach to enhancing digital connectivity and innovation. However, it also places significant responsibility on MoDEE to balance progress with the consideration of potential social risks, such as data protection, digital inclusiveness, and the safeguarding of individual rights within the digital sphere. The success of this legal framework in managing social risks will ultimately hinge on MoDEE's ability to execute its responsibilities with transparency, efficiency, and an eye toward the broader societal implications of the nation's digital evolution.
11	The bylaw of the Institute of Public	The bylaw of the Institute of Public Administration showcases a strong dedication to enhancing the skills and knowledge of public sector

	Administration No. 9 for the year 2021	employees. However, there are gaps in explicitly addressing specific challenges such as equitable training opportunities, gender sensitivity, and accommodating those with steeper learning curves. These areas should be expressly tackled in the bylaw or accompanying documents and strategies for a more holistic approach. This will ensure that the commitment to capacity building in the public sector does not inadvertently marginalize or overlook certain groups. This should be closely coordinated with the actions under the modernization plan.
12	Bylaw No. (30) of 2023 Service and Public Administration Commission (SPAC)	o The bylaw establishes the Service and Public Administration Commission (SPAC) to oversee and enhance the quality of public administration and service delivery. SPAC also replaces the Civil Service Bureau, assuming all its legal and practical responsibilities. Established with financial and administrative independence, SPAC operates under the leadership of the Prime Minister. Its organizational structure comprises several key departments focused on policy development, standards, monitoring, compliance, technical support, advisory, and job efficiency evaluation. SPAC's mandate revolves around developing, promoting, and embedding governance, transparency, and compliance principles across governmental departments. It is tasked with preparing policies, strategies, and standards across various domains such as human resources, leadership, organizational structures, and institutional culture. Additionally, SPAC monitors departmental adherence to these frameworks and conducts specialized research to further public administration development. The governance of SPAC is entrusted to a council chaired by a high-ranking official appointed by a royal decree. It includes four executive directors with relevant expertise alongside the Public Administration Institute General Director. This council approves policies, strategies, and operational frameworks, ensuring their alignment with the commission's objectives and submitting them for Cabinet approval. The SPAC Council is responsible for implementing policies, managing the executive apparatus, and ensuring the coordination of work with related entities.
	Access to Informatio Law (2007)	Jordan's Access to Information (ATI) law, enacted in 2007, aims to foster transparency and accountability. However, its implementation may pose challenges in managing social risks. Key concerns include the vague definitions that might lead to arbitrary denials, the absence of clear oversight mechanisms, and broad conditions that can limit information access. The potential for misuse in determining fees and a lack of penalties for non-compliance further complicate the law's effectiveness. These issues highlight the need for critical refinement in the law to genuinely realize its goals, balancing the accessibility of information with safeguards against misuse in a democratic society.

14	2022 Dat Classification an Management Policy	The Jordanian government's evolution from the "2020 Government Data Classification and Management Policy" to the newly prepared "2022 Government Data Classification and Management Policy" reflects a progressive approach to organizing and managing government data. The alignment of the new policy with the "Protection of State Secrets and Documents Act No. 50" of 1971 signifies a careful consideration of legal frameworks. By clarifying data management rules and enabling data-driven entrepreneurs to access and benefit from this data, the policies may play a vital role in enhancing transparency and accountability within governmental operations. However, the effectiveness of these policies in managing potential social risks will rely heavily on rigorous implementation and continuous oversight by the MoDEE. The balanced approach to data access and protection underscores the government's commitment to fostering innovation while safeguarding sensitive information.
15	Instructions for Publishing Open Government Data for the Year 2019	The Instructions provide a legal framework for transparent governance. Under MoDEE's oversight, the guidelines promote the accessibility of governmental data, aligning with global standards and integrating advanced technologies to facilitate user interaction. These measures serve to bolster transparency, accountability, and citizen participation. The platform's capabilities ensure alignment with global classifications and the availability of datasets in user-friendly formats. Furthermore, continuously updating datasets, free access, and the designated areas for news and FAQs underline the government's commitment to openness. However, some areas present potential social risks. The lack of clarity in classification criteria could lead to inconsistencies across government entities, hindering uniform application. The absence of specific measures to ensure data privacy might expose individuals to risks related to personal information. The absence of a defined feedback mechanism hampers public engagement in improving data quality, relevance, and usability. Finally, the lack of defined training programs or capacity-building for governmental entities might slow down the effective implementation of the policy.
16	The Public Statistics Law, under Law No. 24 of 1950 and its amendments	The law guides the Department of Statistics in its roles of data collection, coordination, analysis, and publication across various sectors including demographic, social, and economic. This includes conducting censuses in areas like population, housing, agriculture, and industry. The law grants the Department specific powers for statistical collection, allowing access to institutional and company records. It centralizes statistical information collection within the Department, requiring other entities to obtain approval from the Director General of DOS for any data collection or publication. Furthermore, the law mandates cooperation from government bodies, private enterprises, and individuals with the Department. It obliges these entities to provide accurate data within a set timeframe, with penalties for non-compliance. Additionally, the law emphasizes the confidentiality of

		individual data, prohibiting its access and use by any party other than for statistical tables.
17	Jordan E-participation Policy	The Jordanian E-participation policy seeks to foster community engagement through the integration of electronic tools in government processes. It focuses on enhancing transparency, accessibility, and active public involvement. Key elements include providing clear electronic information, enabling online consultations, and involving citizens in decision-making. The responsibilities are shared between MoDEE and various governmental entities. Despite a clear outline of principles, the practical framework and platform are still under development by MoDEE, and proper execution will be vital to mitigate potential social risks.

Moreover, The Public Sector Modernization Roadmap for 2023-2025 and the National Digital Transformation Strategy & Implementation Plan for 2021-2025 both reinforce Jordan's commitments in these domains. The former aims at leveraging digital technologies to enhance government operations and citizen engagement, while the latter outlines a robust investment plan in digital infrastructure and platforms. Notably, the digitalization efforts, including issuing biometric IDs to half the citizenry, correspond with the constitutional mandate to promote participatory governance and social inclusion. These multi-faceted legal and strategic documents collectively provide a sturdy foundation for any public or international initiatives to bolster digital government, citizen participation, and social equity in Jordan.

4.3.2 Institutional Frameworks for Social Management of The Program

Public Sector Modernization Governance

The institutional architecture for administering the Public Sector Modernization Roadmap is firmly anchored at the highest level of government. Under the purview of the Deputy Prime Minister for Economic Affairs and Minister of State for Public Sector Modernization, two crucial units have been constituted within the PMO: the PMIO and the Digital Transformation Unit (DTU). The latter is still to be established.

MoPIC - The Reform Secretariat Unit (RSU) was established in 2019 to support the implementation of the Reform Matrix following its launch during the London Initiative “Jordan: Growth and Opportunities The Reform Matrix, developed by the Government of Jordan with support from the World Bank and development partners, approved in 2018 and launched in 2019, outlines a series of policy and structural reforms across 12 pillars, including fiscal policy, public sector efficiency, business environment, investment and trade, finance access, labor market, social safety nets, and sectors like transportation, energy, water, agriculture, and tourism. These reforms aim to stabilize the economy, enhance the business climate, and boost investments and exports. The Reform Secretariat is tasked with driving and monitoring the implementation of the matrix, coordinating with stakeholders, providing technical assistance, and reviewing progress. It also supports various World Bank operations and serves as the focal point for the Jordan Growth Multi-Donor Trust Fund, showcasing a comprehensive effort to foster economic growth and inclusivity in Jordan.

Institutional Governance

- Deputy Prime Minister for Economic Affairs and Minister of State for Public Sector Modernization: Holds overarching responsibility for the Public Sector Modernization Roadmap. Under DPM oversight, the PMIO is established and capacitated. Also, the DPM heads the Inter-Ministerial Committee for Public Sector Modernization, established to ensure coordination at the political leadership level.
- PMO: As the primary anchor for implementing the roadmap. Within it, multiple units' function:
    1. PMIO: Tasked with overseeing the comprehensive implementation of the Public Sector Modernization Roadmap. This unit is already partially staffed, with a director in place and its organizational structure finalized.
    2. Prime Minister Delivery Unit (PMDU): Established in 2010, this unit monitors the execution of the Economic Modernization Vision.

Service and Public Administration Commission (SPAC) was established in 2024 to replace the Civil Service Bureau (CSB) and expand its mandate to service delivery. The CSB was founded in 1955, initially governed by the Civil Service Bylaw No. 1 of 1958. The bylaw experienced multiple amendments, culminating in a significant revision in 2007. The CSB in Jordan is a central entity for overseeing and enhancing human resource management in the public sector. With a comprehensive mandate, the CSB covers administrative oversight, employee selection, career development, legislative proposals, and handling complaints and grievances. It aims to bolster efficient and transparent operations while adapting to the evolving needs of civil service departments.

The SPAC was established per Article 120 of the constitution. The SPAC is headed by an individual at a ministerial level and supported by five executive managers. A bylaw was developed for human resource management, applicable to newly appointed employees.
The mandate of SPAC include:

- Management and development of policies and standards.
- Oversight and compliance management.
- Technical and Advisory Support for the implementation of policies and legislation.
- A Competency Assessment for selection, appointment, promotion, training, qualification, and performance evaluation.
- An Institutional, Financial, and Administrative Development that serves as the Operational Department of the Commission.

SPAC and the professionalization of the Civil Service will also be supported by the Institute of Public Administration (IPA). The Institute is mandated to provide specialized training aligned with civil service competencies and national priorities. It offers a range of courses that focus on key aspects of public administration, employing up-to-date training methodologies like e-learning. The Institute's state-of-the-art facilities and qualified staff enable it to meet modern educational requirements. It also collaborates with various local and international organizations to broaden its impact.

Digitalization System Governance

MoDEE is Jordan's principal authority for transforming the nation into a digital economy. Originating from its initial remit as the Ministry of ICT, MoDEE has expanded its focus to include the facilitation of Digital Entrepreneurship, Digital Skills, and Digital Financial Services.

MoDEE is anchored for supporting Digital Entrepreneurship by addressing challenges such as market access and regulatory impediments, aiming to establish Jordan as a regional technological hub. The Ministry also is at the helm of national digital initiatives, including digitalizing governmental services and implementing the National Broadband Program. They attract local and foreign technological investments and promote technology adoption among citizens. The Ministry prioritizes skill development, increases in governmental efficiency via digital services, and culturing a milieu amenable to digital economic growth and cybersecurity.

The MoDEE organizational structure includes the Secretary-General (SG) position for Digitalization, overseeing the Office for E-Government Management and Operation. This office administers approximately 19 diverse divisions and directorates, including the Directorate for Digital Transformation, Division for Data Security, E-Payment Unit, and Quality Assurance. In parallel, the SG also manages the National Fiber Optic Network Program Office, comprised of around seven directorates and divisions. These entities are specifically tasked with overseeing the infrastructure of the nation's fiber optic network.

Health System Governance

The MoH is the primary authority overseeing all health affairs in the Kingdom. Its roles and responsibilities include maintaining public health through providing preventive, treatment, and health control services. It also undertakes the task of regulating and supervising health services rendered by the public and private sectors. Furthermore, it aims to provide health insurance to the public within the limitations of available resources and is responsible for establishing and governing health educational and training institutes in compliance with existing legislation.

According to its organizational structure, the Electronic Transformation and Information Technology Directorate falls under the purview of the Secretary-General for Administrative and Technical Affairs. This directorate digitizes and streamlines healthcare operations and data management.

The Hakeem Program was Inaugurated in October 2009, the Hakeem program, administered by Electronic Health Solutions (EHS), serves as Jordan's seminal initiative for automating its public healthcare sector. The Program utilizes the VistA enterprise-wide information system to facilitate its primary objective: the nationwide implementation of an Electronic Health Record (EHR) solution. Healthcare professionals can thus electronically access comprehensive patient medical records across participating facilities by utilizing a patient's national ID number. The scope of accessible information is extensive, ranging from medical histories to digital lab results. The program's dual benefits manifest in both patient-centric and facility-level improvements. For patients, the initiative enhances safety protocols and optimizes healthcare workflows, while healthcare facilities witness a substantial

reduction in operational costs and a rise in standardization, meeting international benchmarks. Moreover, the program is instrumental in generating a comprehensive patient database for research and policymaking, thereby contributing to workforce development in health informatics and (IT) within Jordan. In essence, the Hakeem program represents a pivotal advancement in optimizing healthcare delivery through digitalization, offering both cost-efficiency and elevated quality of care. The system has adopted the VistA system from the U.S. Department of Veterans Affairs for its medical record management. As of 2022, 39% of MoH facilities, including 32 hospitals and various health centers, use Hakeem as their Electronic Medical Record (EMR) system. The MOH aims to implement this national EMR system across all remaining facilities within five years. This includes deployment in six more hospitals, 56 Comprehensive Health Centers (CHCs), and 259 Primary Health Centers (PHCs). The process involves analyzing health facility needs, enhancing workflows, purchasing IT equipment and software, configuring the platform, integrating medical devices, system installation, staff training, and ongoing technical support and troubleshooting.

Education System Governance

The MoE has a multifaceted role encompassing a range of responsibilities aimed at the holistic development of the educational sector. Initially, the Ministry is tasked with establishing and governance of governmental and educational institutions across multiple levels while ensuring the provision of qualified personnel and essential teaching materials are provided. Concurrently, it is also accountable for creating a conducive infrastructure for these institutions, distributed in alignment with national educational policies. Supervision extends beyond governmental bodies, as the Ministry oversees the compliance and quality of private educational establishments.

According to its organizational structure, the Administration of Exams and Tests falls under the Office of the Secretary-General for Educational Affairs. This office is specifically responsible for the General Secondary Education Certificate Examination.

Access to Information Governance

The "Access to Information Law No. 47 of 2007," enacted on 17 June 2007, established the Information Council, which the **National Library** hosts. The Council is tasked with ensuring the provision of information to applicants within the bounds of the law, addressing complaints regarding information access, and settling them by guidelines. Moreover, the Council is responsible for adopting standard information request forms, issuing bulletins, and conducting appropriate awareness campaigns to promote the culture of the right to knowledge and access to information. The Information Commissioner shall prepare an annual report detailing the state of information access, ratified by the Council, and submitted to the Prime Minister.

The Information Council's membership includes:

- Minister of Culture (Chair)
- Information Commissioner/Director-General of the National Library (Deputy Chair)
- Secretary-General of the Ministry of Justice (Member)

- Secretary-General of the Ministry of the Interior (Member)
- Director-General of the General Statistics Department (Member)
- Director of Moral Guidance in the Armed Forces (Member)
- General Commissioner for Human Rights (Member)

The Information Commissioner has specific responsibilities:

- Collaborate with the department to prepare standard information request forms and submit them to the Council.
- Develop guidelines for complaint acceptance and settlement procedures and present them to the Council for approval.
- Receive complaints from information requesters and forward them to the Council for resolution.
- Execute administrative and professional measures to fulfil the Commissioner's assigned tasks and responsibilities.

This institutional arrangement is revisited under the draft amendments tabled to Parliament by the Government and examined by Parliament in early 2024.

The Department of Statistics (DoS) Governance

The DoS offers a range of services, including providing statistical figures in published, unpublished, or raw formats, and distributing statistical publications. They also approve requests for surveys for external parties and supply geographic statistical data, such as maps. Additionally, the DoS offers training at the Jordanian Statistical Training Center, conducts surveys, provides statistical experts, issues press releases, and generates analytical reports. These services are integral to supporting various research and analytical needs in statistics.

4.3.3 Implementation of Social Management Systems

Although the EIA Outline template appended to the regulations suggests including socio-economic baselines and cultural heritage descriptions, the system needs to be improved to effectively address social risks and impacts. The EIA regulations should have explicit requirements for "social impacts" assessment. The current practice often relies on outdated demographic and socio-economic data, without conducting thorough project-specific social assessments or engaging with stakeholders.

Furthermore, the accreditation process for consultants, overseen by the Ministry of Public Works and Housing, demands licensure from engineering firms, inadvertently sidelining environmental consultants with specialized expertise crucial for comprehensive EIA, including those proficient in social risk and impact assessment. This process limits the diversity and depth of expertise available for conducting EIAs, especially since there are no specific accreditation criteria for social specialists.

Moreover, the involvement of sectoral ministries in the EIA Reviewing Committee does not extend to those with a broader social development mandate, such as the Ministry of Social Development or the Ministry of Labor, thereby restricting the scope of social risk and impact consideration in project

assessments. The limited stakeholder engagement, primarily confined to the scoping stage for high-risk projects, along with the lack of requirements for continuous public consultation and disclosure of EIA documents, further weaken the system in addressing social concerns and impacts throughout the project lifecycle. This situation also limits opportunities for meaningful and ongoing stakeholder engagement, critical for enhancing the environmental and social sustainability of projects.

Moreover, there is no legal framework for project-specific grievance mechanisms during project implementation, which diminishes the capacity for addressing and mitigating environmental and social risks, leaving communities with limited avenues to raise and resolve grievances. This scenario highlights a critical need for revising the EIA process to incorporate a more inclusive and thorough approach to social risk and impact assessment, ensuring that EIAs serve not only as a tool for environmental protection but also as a mechanism for safeguarding and promoting social well-being**.**

Beyond the general regulatory frameworks and systems elucidated above, the GoJ has instituted additional systems for meticulous management and evaluation of public performance and policy initiatives and for obtaining citizens' feedback.

Government Performance and Achievement Follow-up System: Launched specifically to monitor the "Executive Program for the Years 2023-2025 for Economic Modernization Vision (EMV)," this system was elaborately discussed in a two-day forum held on 25-26 August 2023. Hosted by the Prime Ministry, the presentation confirmed that projects under the modernization plan might be incorporated into this tracking system. Twenty specialized units have been designated in relevant ministries to oversee the plans. The outcomes of this vigilant follow-up are made public on the official platform Performance and Achievement Follow-up System[3].

However, in order for the government to report on the impact of the EMV implementation, the creation and collection of national data on outcome metrics needs to be developed. In this context, focusing on Key Result Indicators, rather than traditional KPIs, would offer a more nuanced understanding of achievement against objectives. As a case in point, Hakeem's healthcare system, while robust, exhibits notable lacunae in its KPI framework. This reflects a broader need for precision and depth in performance measurement systems.

King Abdullah II Center for Excellence (KACE): Established in 2006 under Bylaw Number (6) of the Year 2006.
The KACE is independent from the GOJ and has demonstrated capacity to assess institutional capacity and performance, including by granting the King Abdullah Excellence Award for government performance and transparency to reward excellence and innovation in public service. The KACE recently introduced a new assessment model for how public entities meet the requirements and expectations of citizens in obtaining better quality government services. Specifically, it captures effectiveness in planning, implementation, and transformation through eight criteria: (1) national and sectorial strategic directions; (2) leadership role; (3) institutional strategic planning; (4) government resource management; (5) government workflow management; (6) knowledge management; (7) institutional learning; and (8) change and innovation management. It mobilizes a long roster of certified assessors and convenes former government officials whose authority is recognized.

[3]Performance and Achievement Follow-up System. Retrieved from https://pmdu.gov.jo/

Manual for Impact Evaluation Policies by MoPIC: The MoPIC has developed a manual that sets out guidelines for "impact evaluation policies." This initiative aims to provide a structured approach for assessing the effectiveness of social programs, thereby contributing to the better allocation of public resources.

The Economic and Social Council (ESC) of Jordan, established in 2007 and Empowered by Regulation No. 117 of 2007 aims to advise the government on socio-economic issues, is mandated with several key responsibilities. These include proposing general policies, plans, and programs for its operation, providing consultations in accordance with its regulation and related instructions, and evaluating and suggesting policies in economic and social sectors.
Furthermore, the ESC is authorized to receive consultation requests from the Council of Ministers, public institutions, and public enterprises on matters related to economic, social, cultural, environmental areas, and social dialogue. Article 19 of its regulation grants the ESC complete independence in its activities, including the right to access all relevant information, studies, and documents for its tasks and discussions, ensuring it operates based on current legislation.

Citizens' Feedback and Government Redress Mechanisms (GRM): The MoDEE has showcased its commitment to capturing nuanced citizens' experiences by deploying administrative data and user analytics such as user journey mapping. This proactive strategy harmonizes well with uploading service cards by line ministries to the National Registry of Government Services, thereby providing a user-oriented matrix for assessing service delivery benchmarks like timeliness. Furthermore, MoDEE has earmarked resources for disseminating performance audits and routine progress reports to fortify citizen participation and accountability frameworks. However, areas of improvement still exist, such as, enhancing the transparency and responsiveness of the MoDEE in implementing the recommendations from the 2022 World Bank report on the GRM is crucial. Addressing the identified gaps in organizational structure, performance management, and the GRM value chain is essential for meeting the World Bank's Citizen Engagement and Environmental and Social Framework (ESF) standards promptly.

Also, regarding recruitment, establishing a structured appeal mechanism for potential public sector employees, particularly graduates, is vital for improving transparency and equity. Such a mechanism would increase accountability and lend credibility to public sector recruitment processes.

Establishing a dedicated Grievance Redress Mechanism (GRM) channel for Hakeem's healthcare system is essential for improving service delivery. Currently, there's no specific channel to segregate Hakeem-related complaints from general healthcare grievances, which complicates tracking and addressing issues effectively. A specialized channel within the MoH GRM would allow for direct handling of Hakeem-specific complaints, facilitating quicker resolutions, identifying areas for improvement, and enhancing overall healthcare quality and decision-making.

In the Access to Information landscape, the ATI **has** several areas of improvement, ranging from public awareness to bureaucratic barriers. Notably, the ATI law needs better enforcement. The legislation, though robust on paper, confronts multiple operational challenges. While the law mandates releasing

information upon request, it is beleaguered by bureaucratic inefficiencies that impede its practical implementation. The absence of a proactive disclosure mechanism, whistle-blower protections, and strong enforcement apparatus further also needs improvement. Moreover, the limited scope of the law's applicability, particularly its exclusion of private entities performing traditional public functions, requires immediate attention. For example, although the Information Commissioner is mandated to compile an annual report outlining the status of information accessibility, subject to Council approval and subsequent submission to the Prime Minister, the most recent publicly available report dates back to the 2019/2020 fiscal year.

Although the government strongly intends to promulgate awareness about government's initiatives, our assessment finds that the impact has yet to be fully realized. Even community leaders, who one might expect to be well-informed, exhibit a lack of awareness of key initiatives like Sanad and "At Your Service."

Regarding the interactive statistics platform, the Department of Statistics (DoS) faces challenges with outdated information and a lack of gender-disaggregated data at the governorate level and for individuals with disabilities. These issues primarily stem from limitations in resources. However, DOS is improving data and analytics through developing coordination and data exchange mechanisms with all national data producers to enhance reliance on administrative records in statistical work. The WB is supporting DOS (through the MDTF) in developing the National Statistics Development Strategy (2024-2028) which will place the National Data Center as a key component in national statistics. In recent years, the WB has supported DOS in improving the Open Data Inventory (ODIN) score from 53 to 66 out of 100, by making existing data more accessible (machine readable, documented, downloadable), new data available (i.e., in areas not currently covered, gender-disaggregated data), or a combination of the two. Further improvements are expected in the upcoming ODIN evaluation cycle.

In the pursuit of integrating digital assessments within the educational landscape, a multidimensional risk-mitigation approach is planned to encompass aspects ranging from change resistance to technological reliability and inclusive accessibility.

A phased implementation strategy has been adopted to abate the resistance often concomitant with technological shifts. The introduction of digital testing in lower grades serves dual purposes: acclimatizing students to the digital ecosystem and smoothing the transition curve. Trained educators during assessments shall ensure immediate redressal of technical glitches, effectively dovetailing with the broader objective of quelling apprehensions surrounding digital transformations.

To mitigate risks related to technological disruptions, the MoE has orchestrated a comprehensive plan that triangulates accessibility, security, and operational resilience. The cloud-based exam architecture accommodates students' internet connectivity diversity, thus enhancing accessibility. Security is buttressed through adherence to ISO 27001 protocols, including hidden codes and privacy filters. Infrastructural resilience is bolstered by a two-year roadmap for establishing computer labs specifically engineered for digital assessments. Additionally, contingency mechanisms featuring backup power and device-switching capabilities are in place. The Ministry is even negotiating partnerships with industry leaders like Amazon and Microsoft to escalate the robustness of its cloud infrastructure.

A GRM will be enshrined directly within the digital interface to maintain integrity in the digital assessment system. This enables real-time complaint lodging and expedited processing, fortified by operation centers that remain active during exams. Despite this, the planned GRM does not maintain granular logs of individual complaints, representing a point that may benefit further refinement.

Accessibility extends beyond connectivity and encompasses inclusiveness for PwDs (PWD). Accommodations range from screen color adjustments for students with color vision deficiencies to screen reader technologies for the visually impaired. Personal assistants or readers are availed to blind students, ensuring that the digital exam ecosystem is navigable for them. Teachers will serve as vital conduits, ensuring the effective implementation of these accommodations while offering both technological guidance and moral support.

The unclear division of responsibilities between oversight and implementation roles undermines effectiveness and trust. Specifically, stakeholders highlight vulnerabilities in entities like SPAC and healthcare systems, such Hakeem. SPAC may struggle, as it cannot oversee compliance and performance, offer technical support, and participate in decision-making for promotions and hiring, especially when it administers the hiring tests. Similarly, it's problematic for SPAC to handle complaints about the very processes it oversees. Hakeem faces a similar challenge: being responsible for designing, implementing, and addressing complaints about its system, it ends up monitoring itself, a role more suitably assigned to the MoH. These issues can affect the reliability and effectiveness of these systems and raise concerns over the accountability of oversight mechanisms. **Regarding capacity and human resources,** Improving the preparedness of government agencies to manage recruitment processes efficiently is crucial for enhancing overall organizational performance and service delivery. The need for an E-management system for human resources becomes increasingly evident in this context. Additionally, the issue extends to the lack of qualified technical personnel within many implementing agencies. For instance, the MoH shows a shortage of IT personnel, particularly in facilities external to the Ministry. The lag in capacity-building and adequate staffing may hamper immediate operational efficiency and pose longer-term risks to the implementation and scalability of digital governance initiatives.

Finally, it should be noted that neither a dedicated social and environmental assessment nor specialized personnel to oversee social risks and diverse effects is present within the Programs included in the PforR.

4.4 Evaluation of The Program's Environmental and Social Management Systems in Relation to The Basic Principles of The PforR Policy

Core Principle #1: 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.

The proposed Program's alignment with Core Principle #1 could be improved in several significant areas. While a good legal and regulatory framework for E&S risk management exists at national and regional levels, the proposed Program could benefit from more robust E&S assessments and

stakeholder engagement to better manage and minimize adverse E&S impacts. The current approach tends to apply uniform policies that may not adequately address the varying needs of different groups and locations, impacting its ability to fully embrace E&S sustainability as set out in sub-point (a) of Core Principle #1.

In terms of organizational structure, the MOPIC has defined roles for coordinating the proposed Program, including its E&S aspects. However, the proposed Program could enhance its capacity for informed decision-making—consistent with sub-point (c) of Core Principle #1—by strengthening mechanisms for impartial assessments and stakeholder involvement in identifying and prioritizing E&S risks, and by improving access to E&S information.

Moreover, although the proposed Program has the legal framework to allocate resources for E&S assessments, the implementation could be more effective. The agencies responsible for carrying out the proposed Program currently lack the human and financial resources to apply social and environmental management procedures effectively. This situation must be addressed to better align with Core Principle #1.

Lastly, although a national GRM is in place, there is room for improvement in raising public awareness about how it functions, particularly concerning E&S risk management. Addressing this gap could strengthen the proposed Program's ability for informed decision-making concerning its E&S effects.

Core Principle #2: 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.

Based on the available data, there is no evidence to suggest that the activities undertaken by the Program would lead to significant conversion or degradation of critical physical or cultural heritage assets.

Core Principle #3: 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.

The Program under evaluation poses environmental risks linked to e-waste generation, particularly if not managed, recycled, and disposed of responsibly. While Jordan has established regulations and collection centers for e-waste management, most e-waste remains in landfills, posing environmental and health hazards.

Regulatory measures are in place to monitor ICT hardware and supplies import. Despite these safeguards, the lack of human resources limits the capacity for effective monitoring and enforcement, particularly for hazardous material management.

The Program offers an opportunity to mitigate some of these environmental issues. By leveraging its digital transformation initiatives, it can foster natural resource efficiencies, reduce its carbon footprint, and contribute to green job creation in e-waste management.

Core Principle #4: 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.26

Based on the existing data, no indications exist that the Program's activities would give rise to land acquisition issues or loss of access to natural resources.

Core Principle #5: 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.

The Program systems show potential areas of improvement that could compromise their adherence to principles of cultural appropriateness and equitable benefit distribution, especially for VG. Firstly, the lack of comprehensive social assessments and meaningful stakeholder engagement impairs the Program's ability to satisfy core principle 5's mandates for distributional equity and the unique needs of specific vulnerable populations, including women, PWDs, the elderly, and peripheral governorate areas. This lack of engagement negates considerations of cultural and gender-based constraints, thereby risking non-compliance with the principle's criteria. Secondly, compromising the integrity and transparency within public-sector recruitment processes may undermine the incentive structures in program agencies, consequently hampering efforts to promote equitable and affordable access to benefits. Thirdly, inadequate communication strategies associated with digital initiatives could constrain effective outreach, perpetuating an awareness gap that disproportionately prevents vulnerable communities from accessing the Programs' benefits.

Core Principle #6: Program E&S systems avoid exacerbating social conflict, especially in fragile states, post-conflict areas, or areas subject to territorial disputes.

The Program's design in the three key areas could pose potential challenges. Firstly, the lack of robust E&S assessments and stakeholder engagement could exacerbate existing social inequalities. Secondly, Inadequate integrity and transparency in public-sector recruitment could hinder the professionalization of civil service in general. In addition, access to E&S information and reports, critical for informed decision-making would be necessary to ensure the effectiveness of the Program. Lastly, insufficient communication strategies regarding digitalization initiatives like SANAD or EMR could erode public trust, limiting uptake and perpetuating social injustice. Failing to address these potential risks comprehensively could jeopardize the Program's intended outcomes and escalate social tensions.

4.5 Program GRM "At Your Service"

"At Your Service" is an interactive public and government communication platform. It offers five distinct categories for engagement: asking the government, making suggestions, offering praise, lodging complaints, and reporting corruption. The GRM employs four channels for grievance intake, each with well-defined processes for complaint registration and feedback submission: the "At Your Service" mobile application, the e-government portal, the National Contact Center, and physical complaint boxes at field locations. However, the complaint boxes are inactive despite being outlined in the platform's regulatory documents. A chatbot on the Prime Ministry's Facebook page was also under development.

Regarding data granularity, the GRM doesn't disaggregate information by factors such as location, gender, or age. All submissions are anonymous, requiring only the user's phone number and complaint description. An optional GPS feature is available on the mobile app and e-government portal, although its accuracy has been questioned.

The platform has well-documented protocols for categorizing, logging, prioritizing, and referring cases, as laid out in the "At Your Service" Organizational and Procedural Regulations. All entities receiving complaints via the platform must adhere to these procedures. Upon receipt of a complaint, specific steps are followed to verify details, ascertain geographical relevance based on governorates when applicable, and forward the case to the appropriate service center.

Complaints are classified based on severity and nature, covering aspects such as timeliness, procedural complexities, employee conduct, and quality-of-service outputs. Acknowledgment of receipt and status updates are communicated to users via SMS at various stages of the resolution process.

Moreover, there are established mechanisms for the automatic escalation of unresolved grievances, and all transactions are documented within a national dashboard accessible to administrative entities. A variety of performance indicators, both qualitative and quantitative, are used for analysis, reporting, and annual performance evaluations.

Regarding resolution protocols, each complaint’s status is actively managed, with updates sent via SMS to the user. Cases can be categorized as "resolved," "canceled," or "returned" based on the nature and outcome of the grievance.

In the context of this proposed Program, "At Your Service" is poised to serve as the central GRM, augmenting other internal GRM mechanisms at each implementing agency. Noteworthy updates to the platform include plans for revamping its functionalities to ensure it meets the standards required for this project. Specific areas under review for improvement include data granularity, user authentication, activating previously inactive complaint boxes, and extending the use of social media within the process. Additionally, expanding channels for public engagement. This revamping aims to enhance the platform's functionality and user-friendliness, making it an acceptable and reliable GRM for this project. Therefore, while each implementing agency will maintain its internal GRM systems, "At Your Service" will provide a unified, centralized point for logging, handling, and resolving grievances.

V. Recommendations and Actions

Based on the above assessment, the following measures are proposed under the Program activities to address the identified 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 Program's activities. Table 7 summarizes the proposed ESSA recommendations for the PAP actions.

5.1 Recommendations Added to the PAP

4. E-waste management plan and Standard Operating Procedures (SOPs)
5. Conduct and extend social impact assessments (SIAs) and stakeholder engagement processes for public sector reforms, in line with the guidelines on Regulatory Impact Assessment issued by the GoJ in 2022.
6. Strengthening of the E&S capacities of the implementing agencies for managing E&S risks and impacts

5.2 Recommendations to Be Added to The Program Operation Manual (POM*)*

1. Integrate Extended Producer Responsibility (EPR) and energy efficiency criteria into the procurement process and Requests for Proposals (RFPs) for Information and Communications Technology (ICT) hardware in compliance with energy-saving and carbon-emissions requirements for IT hardware under Jordan's Regulation on the Procedures and Means of Energy Rationalization and Improvement of Energy Efficiency issued in accordance with Article 18 of the Renewable Energy and Energy Conservation Law No. 13 of 2012.
2. Issue a formal guidance document for the disclosure of E&S studies to bolster transparency and compliance within the Program's scope. This could benefit from adhering to the project appraisal guidelines issued by MOPIC in 2021.

5.3 Recommendations Added to DLI Verification:

1. Develop and implement a communication strategy to increase digital identity adoption among public employees and the general public. Collaborate with Civil Society Organizations, academia, and the private sector to minimize resistance to digital transformation and ensure inclusive access.
2. Incorporate Key Performance Indicators (KPIs) that are aligned with desired outcomes into existing performance monitoring systems. Include these KPIs in regular reports of the ongoing Economic Modernization Plan and Public Sector Modernization Roadmap, emphasizing measurable, time-sensitive achievements.
3. Execute a capacity-building initiative across governmental Human Resources (HR) teams, focusing on SPAC employees, to facilitate effective system transformation. Concurrently,

establish a unified HR system to increase fairness and accountability in staff evaluations and promotions.

4. Establish an independent oversight regulations/protocols to ensure separation of duties and accountability for entities like SPAC and healthcare systems such as Hakeem.
5. Prepare stakeholder engagement plan related to governmental employees who will be impacted by the restructuring of the civil service.
6. Formulate and disseminate a public communication strategy that emphasizes the importance of digital student assessments and security. Engage with Civil Society Organizations, academia, and the private sector to mitigate resistance and ensure equitable digital access.

Table 7: ESSA's Proposed PAP Actions

Action Description	Source	DLI#	Responsibility	Timing	Completion Measurement
1. E-waste management plan and Standard Operating Procedures (SOPs)	E&S	NA	PMU	June 2025	Design, consult, execute, and regularly monitor the implementation of an e-waste management plan and Standard Operating Procedures (SOPs), aligning with global best practices and national regulations. The plan and the SOPs would be reviewed and cleared by the Ministry of Environment, and would also include: a. Measures and actions to ensure efficient implementation of the plan and the SOPs (program level), and to enhance the enforcement of e-waste management regulations (program and national levels); b. E-waste generation, temporary storage, and final treatment (recycling, disposal, etc.) monitoring protocols. c. Training plans for executing agencies and key actors in e-waste management, concentrating on e-waste risks, source-based sorting, and environmental management; and establish metrics for ongoing monitoring of training efficacy; and

					d. Public environmental awareness plan centered on e-waste risks, Extended Producer Responsibility (EPR), source sorting, and environmental management.
2. Conduct and extend social impact assessments (SIAs) and stakeholder engagement processes for public sector reforms, in line with the guidelines on Regulatory Impact Assessment issued by the GoJ in 2022.	Social	DLI 5	PMU	Continues	▪ All public sector reform initiatives, in relation to the scope of the Program to include a completed Social Impact Assessment (SIA) and stakeholder engagement plans (SEP) and implement their findings. ▪ Review and update the civil servant code of conduct (CoC) whih includes prohibition of all forms of discrimination. ▪ Commission an assessment of the existing GRM for civil servants and implement its findings, including GRM Standard Operating Procedures (SOPs) with the objective of establishing an effective and official GRM mechanism within the public sector. ▪ Conduct awareness raising and training on the new GRM SOPs and the updated CoC for civil servants.
3. Strengthening of the E&S capacities of the implementing agencies for managing E&S risks and impacts	E&S	All	PMU	Continues	▪ Conduct an institutional assessment for managing environmental and social (E&S) risks of the implementing agencies under the program, including training needs assessment to strengthen the existing E&S capacities. ▪ Implement the findings of the assessment and the related E&S training plan.

VI. Supporting Annexes and Reference Documents

Annex I: Reviewed Resources

Legislations:

1. Cybersecurity Law No. 16 of 2019
2. National Cyber Security Policy
3. Cybercrime Law No. 17 of 2023
4. Jordanian Medical Association Law and its amendments, Law No. 13 of the Year 1972
5. Public Health Law
6. Jordanian Medical Liability
7. The Education Law
8. Modified bylaw for Administrative organization for Ministry of Digital Economy and Entrepreneurship
9. The bylaw of the Institute of Public Administration No 102 of 2021
10. Access to Information Law (2007)
11. Law No. 24 of 2023 of Personal Data Protection
12. Bylaw No. (30) of 2023 Service and Public Administration Commission (SPAC)

Policies and strategies documents:

13. 2022 Data Classification and Management Policy
14. Jordanian E-participation policy
15. Modernization of Political System
16. Jordan Economic Modernization Vision
17. Public Sector Modernization Roadmap.
18. The National Digital Transformation Strategy & Implementation Plan for 2021 to 2025.

Other Resources:

1. Legal Analysis of Jordan Draft Cybercrime Law by ICNL
2. Position Paper "A Year on Modernization" by Jordan Strategy Forum
3. Report on Government Performance, 2023 by Al-Hayat Center-Rased
4. Grievance Mechanism (GRM) Assessment and Strengthening, report by the world bank 2022.

Annex II: Stakeholder Mapping Matrix

Stakeholder	Internal/External	Role in Project	Interest in Project	E&S Issues	Relevant DLI
MODEE. Sanad ***August 16***	Internal – SANAD	Implementing Agency	• Integrated Digital Services • Service Procedures Reengineering • Productivity & Operational Efficiency • Enhanced Resource Management • Internal Procedures Integration • The GoJ has initiated e-payment systems such as a mobile wallet for users of its online one-stop shop platform (SANAD)	Social inequity, unwarranted surveillance, erosion of public trust, data misuse, exclusion from services, system vulnerability, discrimination risks, E&S available systems.	DLI 1 on expanding trusted and inclusive access to people-centric digitalized services DLIs 2 on increasing the inclusive adoption of people-centric digital identity DLI 3 on improving trusted, people-centric data sharing. DLI 4 on digital transformation in health service delivery
Civil Service Bureau - CSB Director and team ***July 18***	Internal	Implementing Agency	• The CSB is actively engaged in modernizing its Human Resource Management Information System (HRMIS), indicating a focus on enhancing HR processes. • Nonetheless, there is a desire to ensure that new project	Employee resistance, transition tensions, tech-savviness gap, gender discrimination, unequal training opportunities, risk of harassment or	DLI 5 Professionalization of civil service

			initiatives do not undermine their ongoing efforts with the HRMIS upgrade. • The CSB exhibits caution towards new ventures, suggesting concerns related to resource allocation and change management. • CSB's has pivotal role in moving toward Civil and Public Administration Commission (SPAC)-under the plan. They have a vested interest in any changes affecting the operations of the civil service. • CSB's has pivotal role in moving toward Civil and Public Administration Commission (SPAC)-under the plan. They have a vested interest in any changes affecting the operations of the civil service.	exploitation, test design bias, overreliance on competency tests, demotivation risks, transition teething problems, system failure risks, cybersecurity concerns, and E&S available systems.	
Prime Ministry Implementation Office (PMIO) Team	Internal	Implementing Agency	• Mainstreaming Competitive Recruitment • Application of Job Competencies in HR Management • Ministerial Workload Analysis	Employee resistance, transition tensions, tech-savviness gap, gender discrimination, unequal training	DLI 5 Professionalization of civil service

			• Determining Surplus and Shortage	opportunities, risk of harassment or exploitation, test design bias, overreliance on competency tests, demotivation risks, transition teething problems, system failure risks, cybersecurity concerns, and E&S available systems, GRM systems.	
	Internal	Implementing Agency	• Improve citizens' access to GRM services.		DLI 1 on expanding trusted and inclusive access to people-centric digitalized services DLI 2 on increasing the inclusive adoption of people-centric digital identity DLI 3 on improving trusted, people-centric data sharing.
MoH – IT team ***August 2***	Internal	Implementing Agency	• Removal of Service Barriers • Enhanced Accessibility to Beneficiaries • Improved Quality of Care • Effective Chronic Condition Monitoring • Increased Clinical Protocol Adherence • Enhanced Clinical Decisions • Promotion of Healthier Behaviors	Social inequity, unwarranted surveillance, erosion of public trust, data misuse, exclusion from services, system vulnerability, discrimination risks, E&S available systems.	DLI 4 on digital transformation in health service delivery DLI 6 on establishing digital health standards across a national Health Information Exchange (HIE)
MoE– Assigned team.	Internal	Implementing Agency		Social inequity, unwarranted surveillance, erosion	DLI 7 on digital student assessment

August 21				of public trust, data misuse, exclusion from services, system vulnerability, discrimination risks, E&S available systems.	
WHO ***July 16***	External	Consultation/Coordination	• Support some digitalization program for the MoH	Work with MoH, concerns, and E&S available systems.	DLI 4 on digital transformation in health service delivery
HAKEEM ***August 2***			• The MoH has been granted an automated health services platform (HAKEEM) which digitizes patients' medical records	Social inequity, unwarranted surveillance, erosion of public trust, data misuse, exclusion from services, system vulnerability, discrimination risks, E&S available systems.	DLI 4 on digital transformation in health service delivery
Civil Society Organizations (CSOs) ***August 22 & 23***	External	Consultation	• Collaborate with MoDEE on E-information Implementation. • Oversee Achievements of Selected Government Programs • Work on ATI • Partner with PM-OGP to Address Human Rights Complaints through Bekhedmatikom.	Social risks and concerns associated with program activities: emphasis on social inequity, unauthorized monitoring, public trust erosion, data mismanagement,	DLI 1 on expanding trusted and inclusive access to people-centric digitalized services DLI 2 on increasing the inclusive adoption of people-centric digital identity.

			• Leveraged Past Collaboration on Bekhedmatikom's Development and Promotion. • Engaged with MoDEE in Open Data Policy Implementation. • Champion Gender Equality and Women Empowerment in Public Sector. • Experience in Monitoring Government Websites. • Monitor Government Social Media Interactions and Activism. • Have programs on digital literacy. • Work with refugees.	service exclusion, systemic vulnerabilities, risk of discrimination, availability and engagement level in social systems, gender-based inequality in the public sector, disparity in training access in the public sector, excessive dependence on competency assessments, risk of employee demotivation, nepotism and unfair processes, initial transition issues with SPAC, risks of system failures, cybersecurity threats, and GRM systems.	DLI 3 on improving trusted, people-centric data sharing. DLI 4 on digital transformation in health service delivery DLI 5 Professionalization of Civil Service DLI 7 on digital student assessment DLI 8 on enforcing access to information
MoEnv ***September 14, 18 & 21***	Internal	Regulatory Authority	• MoEnv would primarily focus on ensuring compliance with environmental regulations and effective waste management. Their interest lies in safeguarding	Environmental risks and impacts associated with improper management of e-waste (hazardous	DLI 1 on expanding trusted and inclusive access to people-centric digitalized services

			natural habitats and public health while adhering to national and international guidelines.	waste), including soil and water pollution, and consequent impacts on public health.	DLI 4 on digital transformation in health service delivery DLI 7 on digital student assessment

Annex III: Stakeholders Consultation Plan During ESSA Preparation

Target stakeholders	Topic of consultation / message	Method of engagement used
Consultation during ESSA Preparation		
MODEE.	DLI 1 Expanding trusted and inclusive access to people-centric digitalized services DLI 2 Increasing the inclusive adoption of people-centric digital identity DLI 3 Increasing the availability of trusted, people-centric data sharing DLI 4 on digital transformation in health service delivery	Face-to-face Meeting
Civil Service Bureau	DLI 5 Professionalization of Civil Service	Face-to-face Meeting
Prime Ministry Implementation Office (PMIO)	DLI 5 Professionalization of Civil Service Improve citizens' access to GRM including e-services.	Half-day workshop Meeting
MoEnv	Environmental Regulatory Compliance: Procedures for obtaining environmental clearances and licenses. Waste Management: Protocols for handling hazardous and electronic waste	Face-to-face Meeting
MoH	DLI 4 on digital transformation in health service delivery DLI 6 on establishing digital health standards across a national Health Information Exchange DLI 10 on institutionalizing effective health data use	Face-to-face Meeting
MoE	DLI 7 on digital student assessment	Face-to-face Meeting
WHO	E-health service delivery Health data management and use.	Face-to-face Meeting
HAKEEM	DLI 4 on digital transformation in health service delivery	Face-to-face Meeting

CSOs	Service Delivery & Government Effectiveness o Strengthening DPI o Implementing E-health service delivery o Professionalizing the civil service o Enabling digital transformation of the health sector o Digitizing student assessment Transparency and Accountability: o Strengthening the nforcing of the access to information framework. o Strengthening health data management and use.	Two FGDs
CSOs and relevant Government agencies	On 19th February 2024, the E&E team held a final hybrid session to share the findings and recommendations of the ESSA report. Relevant government agencies connected to the program and CSOs active in the field attended the session. Stakeholder feedback validated the ESSA findings and emphasized the importance of implementing its recommendations to ensure the program's sustainability and impact.	Final Consultation on the ESSA Report

Annex IV: Stakeholders Consultations Key Findings

Target stakeholders	Topic of consultation / message	Key discussions Outcomes
MODEE	DLI 1 Expanding trusted and inclusive access to people-centric digitalized services. DLI 2 Increasing the inclusive adoption of people-centric digital identity. DLI 3 Increasing the availability of trusted, people-centric data sharing.	**SANAD:** 1. **Public Awareness and Accessibility for SANAD:** MoDEE plan to conduct public campaigns to raise awareness and encourage usage. Also, booths set up in various public locations featuring videos and visual materials. Additionally, Workshops were conducted within government entities to foster digital culture. 2. **Digital Inclusivity:** The Program recognizes the limitations faced by citizens without smartphone access or digital literacy skills. As a countermeasure, Government Service Centers (GSCs) offers an alternative route for accessing e-services. Additionally, community support mechanisms are in place to assist individuals who experience challenges in service access. 3. **Data Protection and Security:** MoDEE has in place: ▪ Rigorous processes within the Ministry for personal data protection. ▪ Robust infrastructure to withstand hacking and security threats. ▪ Ongoing training for various agencies on data and security. 4. **Service Automation and Integration:** Ongoing efforts to automate more services within SANAD. Challenges are faced in cooperation between ministries for digitalization. Currently, the integration of additional services is in progress. MoDEE plans expansion to accommodate companies, not just individuals. **Social Risk Assessment:** 1. No concrete social risk analysis conducted, only ad-hoc surveys for the digitalization program.
Civil Service Bureau	DLI 5 Professionalization of Civil Service	**Transition to SPAC:** 1. Committed to aiding the transition to the Special Purpose Acquisition Company (SPAC).

		Human Resources Management: 1. Existing concerns about the current HR management system. 2. The system requires further development and integration across all government agencies. Apprehensions exist about investing in a new HR system without considering the advancements made in the currently under-developed HR system.
Prime Ministry Implementation (PMIO)	DLI 5 Professionalization of Civil Service Improve citizens' access to GRM including e-services.	**Transition to SPAC: Discussion Overview** 5. The PMIO is spearheading the transition from the CSB to the (SPAC). 6. The impact of this transition aims for fairer and more transparent recruitment processes, enhancing overall public sector performance. **Capacity Building and Compliance:** 7. Capacity building is needed for both government agencies to manage decentralized recruitment and for the new SPAC staff to oversee and ensure compliance. 8. SPAC is responsible for setting compliance standards, monitoring recruitment processes, and overseeing selection criteria. **Gender Equality and Leadership:** 9. No specific measures for women's access to leadership positions, as the system aims to be impartial, treating all genders equally. **GRM:** 10. The implementation of a GRM within the transition and the new system is still under deliberation and will be incorporated into the ongoing planning process. **Citizen Voice and Service Delivery:** 11. SPAC will supervise service delivery and must establish a valid citizen voice system. Current mechanisms will be evaluated and adjusted in line with best practices. **HR National Strategy and Development:** 12. The transition is aligned with a broader HR national strategy, exploring the feasibility of establishing an independent center for HR development. **Code of Conduct and Discrimination:**

		13. Sexual harassment and other forms of discrimination will be examined within the framework of the public employees' code of conduct. **Organizational Culture:** 14. Focusing on organizational culture is crucial for mitigating resistance to the new transition. **Social Risk Assessment:** No concrete social risk assessment was conducted through the plan implementation so far, depending on the previous overall consultation when formulating the plan only.
MoEnv	Environmental regulations and management system, including environmental clearance and licensing. Waste management (including hazardous and e-waste)	***EIA and projects environmental clearance and licensing*** 1. The MoEnv undertakes the responsibility for projects environmental screening and regulating EIA process across the country, with exception to ASEZ which is under ASEZ law and the responsibility of ASEZA. The EIA process demonstrates few gaps when compared with the World Bank E&S requirements, especially with regard to social issues of concern, and stakeholders' engagement and consultation. 2. The Environmental Licensing Directorate is in need of IT solutions to digitize environmental clearance and licensing requests, process, EIA review, document control and disclosure. 3. The MoEnv conducts inspection on all economic activities and projects to inspect compliance with applicable environmental regulations and abidance with the EIA recommendations. Hence, the capacity of the Environmental Inspection Directorate needs to be enhanced. ***E-waste management.*** 4. The Ministry of Environment, and as governed by the Waste Framework Law, regulates waste management across the country and monitors operators (including municipalities) in compliance with the law and related regulations and instructions. To date, the ministry has issued a number of regulations to govern e-waste management, established 25 collection sites, and licensed 10 recyclers. 5. The e-waste unit in particular, and the waste management directorate in general is understaffed and require capacity improvement (physical, mobility, financial and human capacity).

MoH	DLI 4 on digital transformation in health service delivery DLI 6 on establishing digital health standards across a national HIE DLI 10 on institutionalizing effective health data use	**MoH Cybersecurity and IT Overview:** 15. MoH has a dedicated cybersecurity team supported by the MoDEE to fortify data security. 16. Considered among the top ministries facing security threats, alongside MoDEE. 17. There is a deficit in IT expertise, particularly in regional governorates. 18. Employs 40 central-level staff responsible for overseeing IT systems across MoH directorates and facilities throughout Jordan. **Digital Transformation and Service Delivery:** 1. MoH still operates many paper-based services, aiming for inclusion in SANAD's E-services. 2. MoH is in the process of identifying these services for review and reengineering to transition them into E-services. **Digital Literacy and Social Support:** 1. Acknowledges challenges regarding digital literacy but deems the CSCs and existing social support systems sufficient for assistance. **Governance and Accountability of Hakeem:** 1. Currently, there is no data integration between MoH and Hakeem systems. 2. Recommends a review of Hakeem's varied roles to ensure governance, and accountability, and to prevent conflicts of interest in service provision, complaints handling, and maintenance. **Social Risk Assessment:** 1. No social risk assessment is being conducted within the medical service digitalization and processing initiatives.
MoE	DLI 7 on digital student assessment	**Program Benefits:** 1. Instant exam and result access alleviates student stress. 2. Significant cost reduction in comparison to traditional exams. 3. Opportunities for multiple retakes enhance student performance.

		4. Simplified administrative logistics. 5. Long-term financial benefits from initial investment. **MoE Plan to Counter Adverse Effects and risks:** 1. Contingency offline servers for internet instability. 2. Item banking and multiple versions ensure exam accuracy. 3. Equitable access through cloud-based services and Ministry of Digital Economy coordination. 4. On-hand technical support during exams. **Measures to Deter Cheating and Secure the Platform:** 1. Multiple exam versions and session recording. 2. Partnership considerations with tech giants for enhanced security. **Plans for Managing Resistance:** 1. Gradual implementation phases. 2. Dedicated technical and instructional support. **Regulatory Framework:** 1. Existing guidelines allow for flexible exam governance. 2. Objective social impact evaluation through a stakeholder-centric framework. **Stakeholder Engagement:** 1. Early and inclusive stakeholder consultation. 2. Efficient and integrated GRM. **Accommodations for PWD:** 1. Screen adjustments for color vision deficiencies. 2. Screen readers and other tech solutions for the visually impaired. 3. Personal assistance for blind students. 4. Teacher support for technological and emotional needs. **Social Risk Assessment:** 1. No concrete social risk assessment conducted.

WHO	E- health service delivery Health data management and use	• Ministry's Digital Strategy: No concrete health system; complex costing issues; proposal for project scorecards. • WHO on Hakim: Inadequate focus on KPIs; possible new management system. • DHIS-2 Implementation: Active in 31 hospitals, 14 facilities; 100 reporters; aligns with WHO's KPIs.
HAKEEM	DLI 4 on digital transformation in health service delivery	**Hakeem Program Summary:** 1. Actively pursuing additional funds for expansion. 2. Manages all stages: development, implementation, and maintenance. 3. The staff count stands at 300. 4. Covers 88% of government hospitals, 53% of all health centers, and 37% of primary health centers. 5. Uses national ID for Jordanians and specific personal numbers for foreigners. 6. The Hakeem App allows both healthcare providers and citizens to access medical records. **Decision-making and Expansion:** 1. A committee oversees expansion decisions. Chaired by Hakeem's board director and including the MoH Secretary-General and the Royal Medical Services Deputy Director, the committee sets coverage priorities based on fairness and the number of beneficiaries. **Digital Inclusivity:** 1. Hakeem acknowledges that some citizens may lack smartphone access or digital skills. As a mitigation measure, they anticipate that social support systems will aid these individuals. **Challenges:** 1. Limited resources for scaling up. 2. Encountering resistance to the adoption of digital technology. **Data Security:** 1. Data protection measures are in place, developed in collaboration with MoDEE. 2. Access to VIP and sensitive medical files is restricted to authorized personnel and can be court mandated. **GRM:** 1. Hakeem doesn't operate a separate GRM. Complaints are channeled through the MoH. **Social Risk Assessment:** 1. No concrete social risk assessment is conducted regularly other than some user feedback surveys.

CSOs	***Service Delivery & Government Effectiveness*** • Strengthening DPI • Promoting access to e-services through Government Service Centers (GSCs) • Implementing E-health service delivery • Professionalizing the civil service • Enabling digital transformation of the health sector • Digitizing student assessment ***Transparency and Accountability:*** • Strengthening the enforcement of the Access to Information framework interactive statistical information Strengthening health data management and use.	1. Public Perception of Government Achievements: • Concerns were raised regarding the insufficient access to information related to government achieved milestones, leading to a public perception disconnected from actual progress. Issues of media mistrust and negative views of government initiatives were underscored. Also lack of clear reporting methods with clear KPIs was identified. 2. Service Accessibility and Utilization: • Obstacles in accessing services due to technological limitations, such as the absence of smartphones, or the service cycle not completed fully digitally were highlighted. The need for equitable access points and user guides was stressed. 3. Attitudes Toward Digital Transformation: • Suggestions were made to produce brief instructional videos to mitigate challenges and resistance related to digital transformation. Privacy concerns necessitated governmental reassurance on data confidentiality. 4. Confidence in Digital Systems: • A decline in trust towards digital assessment methods was noted, including concerns about fairness and data manipulation. A general hesitancy in engaging with electronic services, such as SANAD, was identified as well. 5. Gender and Societal Implications: • A call for gender-balanced service access was made, particularly concerning vulnerable female populations. The discussion included the establishment of support mechanisms for the elderly and collaborations with various institutions to facilitate service access for all. 6. GRM: • A pronounced lack of awareness regarding GRM was observed, with only a few participants recognizing initiatives such as "At Your Service," apart from the traditional complaints' boxes found in government offices. 7. Access to Information and E-information: • Participants exhibited a notable unawareness of E-information initiatives and related policies. The focus was on inclusive community representation in engagement frameworks, rather than the technical platforms and processes themselves.

		8. Cyber Crime Law Implications: • The current cybercrime law was cited as a barrier to both information access and civic participation. Concerns were raised about the law's ambiguous implementation and its potential to restrict freedom of expression. **Social Risk Assessment:** 2. Participants were not part of any formal social risk assessment or consultation in relation to the DLIs activities.

Annex V: Screening of Potential Environmental Effects

Proposed Activity	Possible Benefits	Possible Negative Risks & Effects
DLI 1: Expanding trusted and inclusive access to people-centric digitalized services	1. The promotion of paperless office operations contributes to sustainable practices. 2. Improved access to information supports informed environmental planning and decision-making.	1. Environmental hazards linked to e-waste generation and management, such as soil and water contamination due to heavy metals, adversely affect human health, wildlife, and marine ecosystems.
DLI 2: Increasing the inclusive adoption of people-centric digital identity	1. The promotion of paperless office operations contributes to sustainable practices. 2. Improved access to information supports informed environmental planning and decision-making.	1. hazards linked to e-waste generation and management, such as soil and water contamination due to heavy metals, adversely affect human health, wildlife, and marine ecosystems.
DLI 3: Improving trusted, people-centric data sharing	1. The promotion of paperless office operations contributes to sustainable practices. 2. Improved access to information supports informed environmental planning and decision-making.	1. Environmental hazards linked to e-waste generation and management, such as soil and water contamination due to heavy metals, adversely affect human health, wildlife, and marine ecosystems.
DLI 4: Digital Transformation in Health Service Delivery	2. Implementation of energy-efficiency standards in the procurement of IT hardware and infrastructure. 3. The promotion of paperless office operations contributes to sustainable practices.	1. This includes: a. IT infrastructure include Edge Firewalls (8 units), Core Firewalls (8 units), Core Switches (8 units), WAN Switches (8 units), Servers (24 units), SAN Storage (8 units), NAS storage (8 units).

	4. Improved access to information supports informed environmental planning and decision-making.	b. Hospitals IT infrastructure upgrade which is assumed to require supply of access switches (160 units), wireless access points (700 units), and Firewalls /Router (50 units). c. IT infrastructure supplies and works will be provided to 256 primary health care centers, 65 comprehensive healthcare centers, 3 specialized centers and 10 hospitals. The supplies include Personal Computers (9000 units), laser printers (3500 units), wristband printers (30 units), label printers (1500 unit), barcode scanners (4000 units), scanners (120 units), laptop on wheels (400 units), laptops (400 units), workstations (60 units), monitor 4MP (45 units), monitor 4MP (15 units), voice rec (60 units), CD burners (15 units), DI connectors (250 units) and servers (30 units). 2. Environmental hazards linked to e-waste generation and management, such as soil and water contamination due to heavy metals, adversely affecting human health, wildlife, and marine ecosystems.
DLI 5: Professionalization of Civil Service	1. Implementation of energy-efficiency standards in the procurement of IT hardware and infrastructure. 2. The promotion of paperless office operations contributes to sustainable practices. 3. Improved access to information supports informed environmental planning and decision-making.	1. Environmental hazards linked to e-waste generation and management, such as soil and water contamination due to heavy metals, adversely affect human health, wildlife, and marine ecosystems.
DLI 6: Establishing Digital Health Standards	4. Improved access to information supports informed environmental planning and decision-making.	
DLI 7: Digital Student Assessment	1. Implementation of energy-efficiency standards in the procurement of IT hardware and infrastructure. 2. The promotion of paperless office operations contributes to sustainable practices.	1. This includes: a. IT infrastructure for the Tests and Examination Directorate / Ministry of Education. b. Total of 19 exam centers distributed in all governorates. Each exams center will constitute maximum of three exams rooms (total of 42 exams rooms across the

		country), and each room will include 78 exam terminals (approximately 3000 PCs), in addition to CCTV system, sounds system, air conditioning, 50 KVA UPS, IT network, mobile jammers. Each exams center will also include control room (servers, switches, CCTV control, sounds control system, etc.). 2. Environmental hazards linked to e-waste generation and management, such as soil and water contamination due to heavy metals, adversely affect human health, wildlife, and marine ecosystems.
DLI 8: Enforcing Access to Information	1. Improved access to information would support environmental planning.	1. No foreseeable major IT infrastructure investments.
DLI 9: Interactive statistical information	1. Improved access to information and consultation in polices would support informed environmental planning.	1. Supply and installation of IT hardware infrastructure is foreseeable (small scale) which constitutes Core Switches (2 units for HQ), Edge Switches 24 Ports (3 units), Edge Switches 48 Ports (33 units), Core Switches (2 units for Jabal Amman), Managed Access Points (16 units), Network Access Control (NAC) (2 units), Internet Edge Next Generation Firewall (2 units for HQ), Data Center Next Generation Firewall (2 units for HQ), Next Generation Firewall (2 units for Jabal Amman), Advanced WAF with Load Balancer (2 units) and Multi-factor Authentication (2 units). Contribution to e-waste generation is insignificant, hence cumulative. 2. Environmental hazards linked to e-waste generation and management, such as soil and water contamination due to heavy metals, adversely affect human health, wildlife, and marine ecosystems.
DLI 10: Institutionalizing Effective Health Data Use	1. Improved access to information would support environmental planning.	

Annex VI: Screening of Potential Social Effects

Proposed Activity	Possible Benefits	Possible Negative Risks & Effects
DLI 1 on Expanding trusted and inclusive access to people-centric digitalized services.	1. Digital identity systems streamline government services and reduce bureaucratic delays. 2. Digital verification enables remote service access, benefiting those in isolated locations. 3. A well-designed digital identity system aids in the financial and social inclusion of marginalized groups. 4. Digital interactions facilitate easier auditing and monitoring, enhancing system transparency. 5. Secure digital identity systems decrease the likelihood of impersonation and fraud. 6. Simplified online transactions through digital identity can stimulate economic growth in sectors like e-commerce and fintech. 7.	**Negative Effects** 1. If not carefully implemented, digital identity systems might inadvertently prioritize or benefit certain groups over others, leading to social inequity. 2. Centralized systems can potentially be used for unwarranted surveillance. 3. Some may resist digital identities due to cultural beliefs. 4. Those without access to technology might be left behind, causing economic strain for lower-income groups. **Risks** 1. Those without access to necessary technology could be excluded from services. 2. Mistakes in the system can lead to wrongful exclusions or inclusions. 3. Over-reliance on a single system might lead to significant disruptions if there are technical issues. 4. The inclusive aim of the Program presents a risk of unintentional discrimination against VG like women, PwDs, refugees, and other marginalized groups in the delivery of services.
DLI 2 on Increasing the inclusive adoption of	1. Streamlined user interactions promote wider service adoption. 2. Rapid adoption boosts overall operational efficiency.	**Negative Effects:** 1. Excessive reliance makes users vulnerable to service disruptions. 2. High trust increases vulnerability to fraudulent activities. 3. Shift towards digital tasks contributes to decline in social interactions.

people-centric digital identity	3. Transitioning to digital channels reduces operational expenses. 4. Elevated trust enables broader service adoption among digitally skeptical demographics.	**Risks:** 1. Enhanced trust exacerbates societal digital divide. 2. Unauthorized data harvesting or misuse risks increase with digital reliance. 3. Non-users are becoming increasingly excluded from essential services.
DLI 3 on improving trusted, people-centric data sharing	1. Unified digital identity systems improve data management and help in decision-making that aligns with citizen needs. 2. Stringent data protection measures safeguard user information.	**Negative Effects:** 1. Frequent issues or misuse of data could erode public trust in digital systems. **Risks:** 1. There is a risk of personal data misuse or unauthorized access in digital systems. 2. Digital identity systems can be vulnerable to hacking and data breaches.
DLI 4 on digital transformation in health service delivery	1. Quick access to patient records enables timely diagnosis and improved patient outcomes. 2. Effective monitoring of chronic conditions and adherence to clinical protocols enhance care quality. 3. EMRs streamline inter-departmental and inter-facility communication, ensuring coordinated care. 4. Reduced paperwork allows healthcare professionals to focus more on patient care. 5. Data analytics help in recognizing patterns for preventative care and public health interventions. 6. Accessible test results eliminate the need for repeat tests, saving time and costs.	**Negative Effects** 1. Digitization raises privacy concerns due to potential data breaches. 2. Dependence on technology might halt operations, impacting patient care. 3. A learning curve may temporarily reduce efficiency as professionals adapt. 4. Inequality in access might create healthcare disparities based on the digital divide or economic disparity. 5. The app for accessing health data may exclude certain groups or lead to misinterpretation of health data. **Risks** 1. The potential for cyberattacks risks compromising patient data.

	7. Seamless transition between care providers is facilitated by easily accessible health histories. 8. E-medical records reduce physical and financial barriers, bringing services closer to beneficiaries. 9. Tech sector job creation includes roles in app development, maintenance, and training. 10. Patient access to data through apps empowers them to manage their health and enhances communication with healthcare providers, while also offering convenience and promoting healthier behaviors.	2. System downtime in the EMR can disrupt processes without reliable backup. 3. A lack of proper backup procedures might lead to data loss. 4. Unauthorized or inappropriate use of the system can cause mishaps or misinformation. 5. Resistance to adopting new technology might hinder its effective utilization. 6. Poor integration with existing systems might cause complications, impacting patient care 7. The inclusive aim of the Program presents a risk of unintentional discrimination against VG like women, PwDs, refugees, and other marginalized groups in the delivery of services.
DLI 5 Professionalization of civil service	1. Skills and qualifications take precedence, reducing nepotism and favoritism. 2. Clear criteria for recruitment and promotion enhance transparency. 3. An even playing field allows candidates to compete solely based on skills and qualifications. 4. Competence-based hiring improves public service delivery. 5. Transparent and competence-based systems boost public trust and morale. 6. Competence as a basis for hiring and promotion motivates employees to perform better. 7. Digital competency training ensures the public sector's relevance and capability.	**Negative Effects** 1. Resistance from employees used to the old system may arise. 2. Transitioning might spark tensions if not managed sensitively. 3. Adapting to new digital tools might challenge older or less tech-savvy employees. 4. Insensitive competency criteria might inadvertently discriminate against women. 5. Uneven distribution of training opportunities might leave certain groups behind. 6. Lack of clear policies or enforcement may put employees at risk of harassment or exploitation. **Risks**

	8. Digital skills enhance the speed, efficiency, and accessibility of public services. 9. Upskilling and attracting top talent give the government a competitive edge. 10. The initiative's focus on continuous learning encourages employee upskilling. 11. Encouraging the recruitment and upskilling of women can reduce gender disparities. 12. Advancing gender equality by focusing on increasing women's representation in governmental leadership roles through gender-sensitive career development strategies.	1. Carelessly designed competency tests or criteria may introduce biases. 2. Sole reliance on competency tests might overlook valuable traits or experience. 3. Consistent failure to meet benchmarks may demotivate some officials. 4. Teething problems might occur during the transition, causing mismanagement or misunderstandings. 5. Heavy reliance on digital tools could be detrimental in case of system failures. 6. With the growth in digital competency, robust cybersecurity is needed to prevent potential data breaches or cyberattacks.
DLI 6 on establishing digital health standards across a national HIE	1. Unified patient history improves care coordination. 2. Health data is readily accessible to both patients and providers. 3. Real-time data enables quick, accurate medical decisions. 4. Redundant tests are eliminated, reducing healthcare costs. 5. Operational transparency is provided to all stakeholders. 6. Multi-sectoral governance incorporates varied interests. 7. An HIE blueprint clarifies goals and direction. 8. Foundational registries standardize health data.	**Negative Effects** 1. The transition to a unified system might face resistance and logistical challenges. 2. Mismanagement risks, including data inaccuracies or inefficiencies, might exist if not properly handled. **Risks** 1. Patient privacy concerns persist in a digital health environment. 2. Without adequate security, there's a risk of data theft or cyberattacks. 3. Unequal integration into the HIE may lead to disparities among different population segments. 4. Incomplete or inaccurate registries may occur if foundational registries are not well-maintained, harming beneficiaries' interests.
DLI 7 on digital student assessment	1. Rapid, often automated, marking speeds up student feedback.	**Negative Effects:** 1. Students might face issues like server crashes, software bugs, or other technical problems during the exam.

	2. Savings in printing and logistics redirect resources to educational quality. 3. Digital formats enable nuanced analysis of student performance.	2. If not designed well, digital exams might not accurately capture a student's knowledge or skills. 3. Not all students all over Jordan have equal access to the necessary technology, which can lead to disparities in opportunity. 4. Power outages, slow internet speeds, or lack of devices can also impede the exam process and impact students. **Risks:** 1. Digital formats may introduce new ways for students to cheat or use unfair means. 2. There's always a risk of hacking, data breaches, or unauthorized access. 3. There's a risk of data loss if proper backup and storage mechanisms aren't in place. 4. Students, teachers, or administrators used traditional methods might resist digital assessments. 5. Teachers and students may require additional training to effectively use digital platforms.
DLI 8 on enforcing access to information	1. Enhanced transparency boosts public trust. 2. Faster responses and proactive sharing inform citizens. 3. Open information facilitates democratic participation. 4. Responsiveness and disclosure heighten accountability. 5. Proactive data sharing engages citizens. 6. Quick, proactive disclosure empowers stakeholders. 7. Disclosure efficiency reduces administrative load. 8. Transparency helps deter corruption. 9. Information access aids marginalized groups.	**Negative Effects:** 1. Potential for hasty or superficial responses due to focus on speed. 2. Strain on government resources and administrative challenges. 3. Risk of misinterpreting information without proper context. **Risks:** 1. Legislative stagnation and controversy surrounding Access to Information framework, signifying substantial risk to future amendments or reforms. 2. Potential infringement on privacy rights if sensitive information is not protected.

	10. Digitized E&S reports foster transparency and understanding. 11. Robust appeals mitigate the risk of unjust denials.	3. Possibility of errors or incomplete information in the rush to respond or disclose, and the risk of prioritizing easier tasks to manipulate success rates. 4. Additional risks related to disclosing sensitive personal data without stringent checks.
DLI 9 on Interactive statistics	1. **T**he merging of DOS and administrative data provides a comprehensive view, supporting nuanced policy analysis. 2. A functioning Data Management Platform facilitates better policy planning and execution by offering rich data insights. 3. The interactive features enable both internal and external users to customize data queries, fostering an informed citizenry. 4. The platform serves as a vital resource for researchers, both local and external, in conducting empirical studies. 5. Integrated data can reveal areas where resources can be reallocated or optimized, potentially leading to cost savings. 6. Timely data updates allow for real-time policy evaluation and adjustments. 7. Open access to data can increase governmental accountability and public trust. 8. The platform can serve as a nexus for multi-disciplinary collaboration between government, academia, and the private sector.	**Negative Effects: Negative Social Effects:** **Negative Effects:** 1. Users without statistical expertise may misunderstand the data, leading to flawed policy recommendations. 2. The platform may not be user-friendly for those lacking technical skills, exacerbating information inequality. 3. Lack of internet access can make the platform unreachable for marginalized communities, thereby excluding them from policy discourse. 4. Ineffectual or flawed platform performance can erode public trust in government data and policy-making procedures. **Risks**: 1. Combining DOS and administrative data without proper anonymization techniques can compromise individual privacy. 2. The platform could be exploited by malicious actors to propagate misleading or false information. 3. The possibility of data misuse by governmental agencies could lead to invasive or unethical policy measures.

DLI 10 on institutionalizing effective health data use	1. Quality data improves health outcomes. 2. Timely data empowers patient engagement. 3. Accurate data fosters trust in healthcare. 4. Data-informed policymaking enhances health strategies. 5. Data highlights disparities for equitable healthcare.	**Negative Effects:** 1. Potential over-reliance on digital data, risking sidelining clinical judgment. 2. Possible stigmatization of specific communities if data reveals health trends. 3. Concerns regarding patient privacy and confidentiality in data collection and dissemination. **Risks:** 1. Data breaches that may expose personal health information, leading to misuse. 2. Misinterpretation of poorly presented or communicated data, causing panic or poor decisions. 3. Risk of data manipulation or selective reporting, especially in performance outcomes or funding. 4. Ethical concerns related to consent in collecting sensitive health data from vulnerable populations.