

## Jordan Emergency Cash Transfer COVID19 Response Project

### LABOR MANAGEMENT PROCEDURES

#### 1. INTRODUCTION

These Labor Management Procedures (LMP) are applicable to the Jordan Emergency Cash Transfers Project. These procedures set out the way in which project workers will be managed in accordance with the requirements of national labor laws and the World Bank's Environmental and Social Standard 2 on Labor and Working Conditions (ESS2). The LMP will be reviewed and updated during Project implementation.

The Project supports the GOJ's COVID-19 response cash support program as well as the regular Takaful CT program. The project will provide cash support to about 270,000 poor and vulnerable households affected by COVID-19 and will include three components as follows: (i) at least 190,000 households receiving temporary cash transfers for six months; (ii) 80,000 households receiving regular Takaful CTs in 2020 (55,000) and 2021 (25,000); and (iii) about 55,000 Takaful beneficiaries receiving top-up payments for six months<sup>1</sup>.

The purpose of the LMP is to facilitate planning and implementation of the project through identification of the main labor requirements and risks associated with the project, including maintaining a safe working environment for workers throughout the COVID-19 pandemic

#### **Project Description**

##### **Component 1: Cash support to poor and vulnerable households affected by COVID-19:**

Subcomponent 1.1: Temporary cash transfers (CTs) to vulnerable households This subcomponent will finance temporary (six month) CTs to at least 190,000 vulnerable households currently not benefiting from National Aid Fund.

- Subcomponent 1.2: Takaful Cash Transfer Program  
This subcomponent will finance regular Takaful CTs for all 55,000 beneficiaries in 2020 and 25,000 out of 85,000 beneficiaries in 2021; including adding 10,000 new households to Takaful in 2020 (to reach the planned 55,000)
- Subcomponent 1.3: Temporary benefit top-up for NAF beneficiaries  
The project will finance a temporary (six month) benefit top-up for households receiving Takaful in 2020 (the same 55,000 mentioned in 1.2)

##### **Component 2: Project management, monitoring and evaluation**

This component will support NAF with the management, monitoring and evaluation (M&E) of project activities. It will finance the PMU and will also finance the costs of: (a) staffing; (b) data collection and

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<sup>1</sup> Sub-totals do not equal 270,000 because some groups intersect

verification, aggregation and periodic reporting on the Project's implementation progress; (c) software and hardware requirements for NAF and relevant institutions necessary for the expansion of the data exchange platform of the National Unified Registry (NUR); (d) monitoring of the Project's key performance indicators and periodical evaluation; (e) communication and outreach; (f) digitization of payments; (g) recertification of Beneficiaries of the monthly and Takaful cash transfer programs; and (h) overall Project Operating Costs, audit costs, including independent verification of the Cash Transfers, monitoring and compliance with the Project's Environmental and Social Commitment Plan (ESCP).

### **Component 3: Contingent Emergency Response Component.**

This component would provide an immediate response to an Eligible Crisis or Health Emergency and would draw from uncommitted funds under the project from other components to cover the emergency response

## **2. OVERVIEW OF LABOR USE ON THE PROJECT**

The project workforce includes:

- (i) direct workers, including PMU staff and NAF workers whose salaries are funded the project, or by other development partners.
- (ii) contracted workers including third-party firms that support the capacity of NAF to deliver the project.

The project will also rely on civil servants that work in various sections in NAF; These workers remain subject to the terms and conditions of their existing public sector employment arrangement. Nonetheless, their occupational health and safety are considered in this LMP, and the measures adopted by the project for addressing occupational health and safety issues, including those specifically related to COVID-19, will apply to them.

### ***Number of Project Workers, Characteristics and Timing of Labor Requirements:***

#### ***Overall Summary:***

The below table includes a summary on the number of workers in NAF, including civil servants that are not financed by the project, and for which the the LMP only applies to in terms of COVID-19 requirements. Currently, 40% of NAF direct workers are below 39 years old. 13.33% of the total direct workforce are females.

**Table 1. Summary table on NAF Workers**

NAF Workers' Category	No.
<b>Category A:</b> Civil Servants in NAF; - Not directly responsible of project implementation, and - Financed by the project or its partners	<b>376</b>
<b>Category B:</b> Direct Project Workers in the Project Management Unit (PMU)	<b>11</b>
<b>Category C:</b> Direct Project Workers out of PMU; - financed by the project and other NAF partners - 50 in NAF Branches - 18 in HQ (out of which 11 are helpline agents) - On temporary governmental contracts (not civil servants)	<b>68</b>
<b>Total</b>	<b>455</b>

**Direct Workers (Categories B and C):** The Emergency Cash Transfer program will staff a total of 79 direct workers; both in National Aid Fund (NAF) Head Quarters (HQ), located in Amman and in NAF branches across 12 governorates in Jordan.

A project management unit (PMU) will be established in NAF HQ, which will be responsible for all aspects of project execution including fiduciary, daily management of project activities to ensure they are implemented in accordance with project document and ensure compliance with the legal documents. The PMU will be headed by a Project Manager that reports to the Director General of the National Aid Fund. The total number of staff under the PMU is 11 which will either be selected from among NAF staff or be recruited following a competitive selection process. The project will cover the salaries of non-civil service staff only. Figure (1) shows the organogram of the PMU.

**Figure1: Project Management Unit (PMU) Organogram**



The project will also finance most of the remaining 68 in Category C, with exception of two workers that will be financed through other development partners such as USAID, DFID, and Swiss Cooperation which will financially contribute to the overall Program through the Joint Financing Agreement (JFA). Although that workers in category C are not under the PMU, the project's support to them is essential as they are responsible for implementing the "Takaful" Program, which was launched in 2018. The PMU will coordinate with workers under category C on the implementation of sub-components 1.2 and 1.

All workers under the project will be hired within 60 days from the project effectiveness date and will be maintained for the full duration of project implementation (24 months), and . Full time workers will follow the governmental working hours (8:00am to 3:30pm) and will have a permanent office/working station in NAF HQ and/or branches. Part time workers are expected to be present in NAF for a minimum of two days per week and to join meetings with NAF management/staff as needed. NAF will also provide a working station for part time workers. All project workers will be above 18 years old and either nationals (Jordanians) or Arabic speakers residing in Jordan during the project duration; with a minimum of 40% of the overall project workers expected to be females. Table (2) below includes the cumulative number of positions and workers, locations, work arrangement, characteristics of the project workers, and skills level for each project job type.

**Table 2. Project Workers Key Information**

ESS2 Category	Description of activities	Estimated Numbers	Characteristics	Timing
Direct Project Workers in the PMU (Category B)	<p><b>Members of the PMU</b> including project managers, and officers representing various disciplines and performing management and technical tasks.</p> <p>Based in HQ, technical and project management tasks, desk based.</p>	11 Direct Workers, HQ/PMU	<p>Direct workers will be placed in NAF headquarters, for either part time or full-time arrangement. Their work will be mainly desk-based. If the COVID-19 situation and governmental regulations allow for it, the M&amp;E officer and the project manager are encouraged to conduct occasional field visit to oversee the implementation of activities. The PMU will have at least 3 women (27%)</p> <ul style="list-style-type: none"> <li>- Will be technically skilled experts in their respective fields, that are responsible of managing the project and undertaken financial, operational and programmatic responsibilities.</li> <li>- Bachelor's degree holders with previous experience working in the development field and competent in Arabic</li> </ul>	PMU staff will be hired upon commencement of the project and are eligible to work for fixed period not to exceed project lifetime

ESS2 Category	Description of activities	Estimated Numbers	Characteristics	Timing
			<p>- 2 Part time workers (twice a week in NAF and upon request) and 9 Full time workers in NAF HQ hired by the project</p> <p>-two of the above will be internally assigned civil servants to the PMU (allowances not supported by the project)</p>	
Direct Workers outside the PMU (Category C)	<p><b>Takaful Case Workers</b> in HQ and branches performing core project tasks under component 1.2 and 1.3 under existing contracts signed with NAF. The project will finance part of their salaries and international donors will finance the remainder.</p> <p>- In HQ work is desk-based</p> <p>- In branches; field work including household assessments.</p>	57 workers (7 in HQ and 50 in branches)	<p><b>Takaful direct workers in HQ and branches</b> are responsible for coordinating the implementation of various processes of Takaful program in HQ and at branch level.</p> <p>In branches, workers' role includes both deskwork and field visits. During the COVID-19 crisis, most of NAF branches will remain closed or will operate with limited capacity; based on the regulations of the Ministry of Health. Essential work tasks will be conducted remotely, as needed. In the HQ, Takaful employees oversee the implementation of the project at the field level, by Takaful staff and by any third-party contractors (e.g. data collection firm)</p> <ul style="list-style-type: none"> <li>-Jordanian nationals</li> <li>-13% females</li> <li>-100% full time workers</li> </ul> <p>Skilled workers, bachelors degree holders, Arabic speakers with basic to intermediate IT skills</p>	Staff have been recruited under NAF, in 2019 and the project will continue to pay for their salaries throughout the project implementation duration
	<p><b>Help Line Agents.</b> These workers are supporting core project functions under components 1.1, 1.2 and 1.3 under existing contracts signed with NAF. Funded by the World Food Program (WFP),</p> <p>Work in central call centre at HQ. Worked from home</p>	11 agents; NAF HQ	<p>Helpline agents will be responsible of receiving and documenting complaints, inquiries and grievances; using the available GM uptake channels (NAF online MIS, NAF call center, Social Media) then either resolving them directly or referring them to concerned NAF staff, based on the GRM referrals flow in the Project Operational Manual. Out of the hired agents, 72% are females.</p> <p>- Jordanian nationals</p>	Staff have been recruited under NAF, in 2019 and the project will continue throughout the project implementation duration

ESS2 Category	Description of activities	Estimated Numbers	Characteristics	Timing
	during the COVID-19 Lockdown		<ul style="list-style-type: none"> <li>- 100% full time workers</li> <li>- Semi-skilled workers</li> <li>- Bachelors Holders, Arabic speakers with good intercommunication skills.</li> </ul>	
Contracted Workers	<p>Workers of third-party firms to perform the following;</p> <p>a) <b>Data collection</b> conduct large scale data collection from households, file-level verification, and conducting information sessions for project beneficiaries. Contracted by NAF</p> <p>b) <b>Programmers</b> under the IT firm that will be programming new modules of the MIS. Contracted by the Bank directly</p> <p>c) Auditors hired by the project as needed</p>	<p>a) Around 200 workers including (Appointment takers, enumerators, supervisors, and office auditors)</p> <p>b) Around 10 programmers to be assigned on the task by the IT company</p>	<p>Its anticipated that the project will contract third-party firms (i.e. intermediaries) to conduct big-scale activities such as; big-scale data collection or verification, conducting information sessions for project beneficiaries or building/programming new modules of the MIS. The number of staff hired by each contracted and their skills will depend on the scale of the activity and the duration and will always be overseen by the PMU and NAF management. As an estimate, NAF is expected to hire (i) a data collection and verification that will conduct either physical or virtual data collection activities for around 50,000 Households (TBC)<sup>2</sup>, in addition to conducted information sessions for beneficiaries and (iii) an IT firm to develop new MIS modules.</p> <p>Full time workers</p> <p>Distributed around 12 Jordanian governorates</p> <p>At least 50% females</p>	Will be contracted based on the implementation timeline of each activity
NAF Civil Servants	Includes managers of NAF Branches, program officers for other programs in NAF that are not covered under the scope of the project)	376	<ul style="list-style-type: none"> <li>- Not directly responsible of project implementation, and</li> <li>- Financed by the project or its partners</li> </ul>	
Non-Project Workers	1) Workers with Payment Service Providers (Banks	N/A	These workers are not considered project workers as their salaries are not supported by the project, by NAF, or by	

<sup>2</sup> The nature of the data collection activities will depend on the COVID-19 crisis situation and the regulations of the Ministry of Health

ESS2 Category	Description of activities	Estimated Numbers	Characteristics	Timing
	<p>and E-wallets Companies)</p> <p>2) Staff Members under NAF Development Partners (e.g. agencies)</p> <p>3) National Call Center Employees (Governmental entity that is supporting NAF)</p>		any contractual agreement that NAF/the project directly pays for.	

### COVID-19 CONSIDERATIONS:

The Project supports COVID-19 response by providing social assistance in the form of financial payments to beneficiaries. COVID-19 exposure concerns for all types and categories of workers identified above, which will be considered in this LMP. Front line workers (either direct or contracted workers) who are conducting field activities (data collection from households and field-level verification at households' level) might be at a higher risk of COVID-19 exposure. NAF will, to the extent possible, replace physical data collection activities with virtual exercises (using phone calls and online data collection applications). If the Government, at any stage decide to conduct activities in the field level. NAF management will ensure that additional protection measures are applied, in line with the LMP OHS section

### 3. ASSESSMENT OF KEY POTENTIAL LABOR RISKS

This section describes the type and location of the project, and the different activities the project workers will carry out.

#### 3.1 Project Activities

This section describes the different activities the project workers will carry out, and the location of those activities. The information is summarized in Table (3). There are no physical works associated with the project.

**Table 3: Project Workers Activities**

Component	Project Processes	Activities by Project Workers
<b>Component One: Cash support to poor and vulnerable households affected by COVID-19</b>	<b>Registration</b>	<b>Helpline Agents</b> will support applicants over the phone, in the process of filling the online form, they will operate from NAF HQ. In exception for cases of lockdown in which they will be asked to work remotely from homes.
	<b>Verification</b>	<p>Data verification will be to the extent possible conducted virtually; <b>by Takaful Case Workers and/or contracted workers under a data collection firm.</b></p> <p>Large scale data collection exercises will be outsourced to third parties.</p> <p>Depending on the COVID-19 situation. Verification exercises could be either virtual (e.g. over the phone) or on the field-level (home visits). In the case of virtual verification, enumerators will work from the contracted firm offices.</p> <p>Might the government decide to conduct field-level verification of households; protection and preventive measurements will be applied, in line with the OHS section</p>
	<b>Enrollment</b>	<p><b>The PMU/GRM Officer</b> is responsible for electronic notification of beneficiaries of their eligibility through sending an automated text message and referring cases that aren't responding to the helpline to call them.</p> <p><b>A third-party, contracted workers</b> will conduct virtual enrollment sessions with beneficiaries (online platforms), phone calls, and fill the enrollment form on behalf of illiterate beneficiaries or others in need.</p> <p>Enrollment workers will operate form the offices of the contracted firm</p>
	<b>Payment</b>	<p>The Takaful Case Workers f in HQ are responsible for generating the payroll using the Takaful MIS and processing the payment through the system based on the established protocols</p> <p>Cash-out by beneficiaries is done at “pre-selected cash-out points; agents” or in Bank branches. This process is not directly supported by project workers.</p>
	<b>Grievance Mechanism</b>	<b>Help Line Agents</b> team receives and resolves the cases using the MIS through the (call center, online form and social media)



Component	Project Processes	Activities by Project Workers
		When NAF branches are operational, beneficiaries can ask for support from branch staff in filling the online GRM form, which is afterwards automatically referred to NAF helpline team in HQ through the information Management System; to be resolved and inform the complainant of the feedback.
<b>Component Two</b>  <b>Project management, monitoring and evaluation</b>	<b>Staffing Hiring Process:</b>	<ul style="list-style-type: none"> <li>Planning and hiring process will be done by NAF HR in NAF HQ (desk-based activity)</li> </ul>
	<b>Planning and Reporting</b>	<p>All planning and reporting activities are desk-based activities placed in NAF HQ and include;</p> <ul style="list-style-type: none"> <li>- Annual Plans by the Project Manager in coordination with NAF Director General.-</li> <li>- Quarterly and semi-annual technical reports which will be prepared by the M&amp;E officer</li> <li>- Financial Reports prepared by the finance Officer and Procurement Reports prepared by the procurement officer.</li> </ul>
	<b>Software and hardware requirements for NAF and relevant institutions necessary for the expansion of the data exchange platform of the National Unified Registry (NUR</b>	<ul style="list-style-type: none"> <li>Mapping of software and hardware needs are desk based activities that require consultations and meetings with participant institutions and NAF</li> </ul>
	<b>Monitoring of the Project's key performance indicators and periodical evaluation</b>	The M&E Officer/PMU will monitor the project implementation through field-level monitoring visits and desk-based report preparations
	<b>Communication and outreach</b>	A desk-based activity; the communication officer in the PMU will be responsible of managing the project communications
	<b>Auditing</b>	Will be outsourced to a third party by the project

### 3.2 Key Labor Risks

As shown in Table 2, Project Workers in the project will be essentially in two different work environments: 1) Office facility environments, including call -centers, either in NAF HQ, Branch offices or off-site facilities of third party firms, and 2) Field data collection or verification at the household level, including home visitations. When fully operational (depending on the COVID-19 situation), beneficiaries may approach NAF branches for questions and assistance (walk-in).

All workers are affected by general terms and conditions of employment (e.g. hours of work, overtime, benefits remuneration, termination of employment; disciplinary measures and grievance procedures).

Project workers will have varying degrees of interactions virtually, or in person with beneficiaries and the general public at NAF offices or in their homes. The project is designed to assist people who are at their most vulnerable, and this introduces a degree of risk for the workers. Across the spectrum of workers, the risks include physical endangerment, exposure to harassment, and stress-related illnesses.

#### **Physical Risks**

Project workers who are public-facing or deal with beneficiary households, may face physical risks of retribution from disgruntled individuals who are informed that they are not eligible to benefit from the cash support. Such incidents could occur in NAF branches as they are in direct contact with project applicants. In addition, when visiting homes in low-income areas, workers may be increasing their exposure to exposed wires, nails, warped steps and floorboards and so on. This increases the risk of injury.

#### **Exposure to Workplace Violence or Harassment**

Based on the International Labor Organization, the risk of experiencing working place harassment refers to “a range of unacceptable behaviors and practices, or threats thereof, whether a single occurrence or repeated, that aim at, result in, or are likely to result in physical, psychological, sexual or economic harm, and includes gender-based violence and harassment”. Gender-based violence and harassment means “violence and harassment directed at persons because of their sex or gender or affecting persons of a particular sex or gender disproportionately and includes sexual harassment”. Project workers, particularly female workers, may be at risk of gender-based violence or harassment from co-workers.

#### **Stress Related Illnesses**

Common stress-related illnesses among workers in the social assistance field include; Chronic fatigue PTSD, Generalized anxiety disorders, and Depression. Social workers and workers in general might face stress related to work pressure and daily interactions with vulnerable households, especially during COVID-19. Home visits to low-income households could also have a negative effect on contracted enumerators as well as NAF staff. This aspect is also applicable to helpline agents.

## COVID-19 Considerations

When an infected individual coughs or exhales, he/she releases droplets of infected fluid. Most of these droplets fall on nearby surfaces and objects - such as desks, tables or telephones. People could be infected by COVID-19 by touching contaminated surfaces or objects – and then touching their eyes, nose or mouth. If they are standing within one meter of a person with COVID-19 they can become ill by breathing in droplets coughed out or exhaled by them. In other words, COVID-19 spreads in a similar way to flu. Most persons infected with COVID-19 experience mild symptoms and recover. However, some go on to experience more serious illness and may require hospital care. Risk of serious illness rises with age: people over 40 seem to be more vulnerable than those under 40. People with weakened immune systems and people with conditions such as diabetes, heart and lung disease are also more vulnerable to serious illness<sup>3</sup>.

Project workers are at risk of facing health risks related to exposure to COVID-19 pandemic. The risk of exposure to COVID-19 causes due to field-level work that require social interaction with project beneficiaries in their place of residence. Workers, once infected themselves, may then become vectors for disease transmission. Owing to the COVID-19 risks, field work is not currently planned.

During project preparation resourcing has been carefully assessed to ensure that the project has adequately staffing levels to meet its objectives. However, similar to influenza viruses, SARS-CoV-2, the virus that causes COVID-19, has the potential to cause extensive outbreaks. Under conditions associated with widespread person-to-person spread, many countries including Jordan, may see impacts at the same time. In the absence of a vaccine, an outbreak may also be an extended event. As a result, any workplace, including NAF, may experience absenteeism. Depending on the COVID-19 outbreak level, NAF HQ and branches could receiving walk-in visits from beneficiaries or the public; which raises the concern about exposure to the virus.

## 4. BRIEF OVERVIEW OF LABOR LEGISLATION: TERMS AND CONDITIONS

Labor terms and conditions for this project are governed by the Jordanian Labor Law No. 8 of 1996 and its amendments thereafter. All references below are respect to this law, unless otherwise noted. The summary of key terms and conditions below is non-exhaustive.

The Labor Law applies to all types of workers under the project. Depending on resource arrangements, some direct workers of the PMU, may be considered civil servants (i.e. civil servants governed by the Civil Servants Bureau Regulations versus consultants) as article 3 of the Labor law states:

Article(3): With due observance to the provisions of paragraph (c) of article (12) of this law, the provisions of this law shall apply to all Employees and Employers with the exception of: a) Civil Servants and Municipal Employees.

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<sup>3</sup> Getting Your Workplaces Ready for COVID-19, WHO, March 3, 2020

## **Documentation of Terms and Conditions of Employment**

Article 15 requires a contract of work to be prepared in Arabic and both the Employer and Employee shall retain copies. Note that as per Article 4 of the labor Law, a work contract or other agreement may establish better rights than those in the labor law. All direct project workers should sign a code of conduct, including articles on prevention of Sexual exploitation, sexual harassment and Gender Based Violence.

Terms and conditions of employment include hours of work, overtime, benefits remuneration, termination of employment; disciplinary measures and grievance procedures).

### **a. Wages and deductions**

As per Chapter 7 (Article 45) wages shall be fixed in the contract. The wage shall be paid within a maximum period of seven days from the date of its entitlement. Only those wage deductions permitted by law are allowed (Article 46, 47). Minimum wage is set by a Committee appointed by the Council of Ministers (Article 52). Minimum wage is fixed by tripartite Committee in Jordanian currency either generally or for a particular area or trade.

An employer who has paid a worker less than the minimum rate of remuneration shall be punishable by a fine of no less than twenty-five and no more than one hundred Dinars in respect of each offense and shall also be ordered to pay the worker the difference. The penalty shall be doubled every time the offense is repeated.

Remuneration is specified in the contract. In the absence of such provision, the worker shall be paid the remuneration that would be assessed for work of the same type, if such type of work exists. Otherwise, remuneration is assessed in accordance with common practice. In the absence of such practice, payable remuneration is assessed by court in accordance with the provisions of this Code, considering the case as a labor dispute over remuneration. Remuneration shall be paid within a period not exceeding seven days from the date on which it becomes payable. An employer may not make any deductions therefrom other than those authorized by this Code.

### **b. Working Hours:**

The ordinary working hours shall be eight hours per day provided that the total working hours do not exceed forty-eight hours per week over a maximum of six days (Article 56). The legal working time excludes meal breaks and rest periods. The seventh day is a paid weekly holiday. A worker may be employed, with his consent, in excess of normal working hours, provided that he is paid overtime at a minimum rate of 125% of his regular remuneration. If a worker works on his weekly rest day or on religious or official holidays, he shall be paid overtime at a minimum rate of 150% of his regular remuneration.

The project does not finance overtime, thus; direct project workers will not be obliged to work overtime. The PMU staff allocation is planned against the workload.

Might the load of work exceed the available HR capacities at the third part contracted agencies, contracted workers will either be paid overtime, or the company would recruited additional workers. The

PMU will make sure that this condition is stated clearly in contractors' contracts and will be monitored accordingly.

### **c. Leave and Rest Days**

Leave and rest days as per Article 19-61. Hours of Work and Leaves are:

- i. NAF operates five days a week and project staff will have to comply with NAF regulations as well as the working hours of the Jordanian law, stated in section b above)
- ii. Paid leave: Every worker is entitled to annual leave with full pay for a period of fourteen days for every year of employment. This leave is extended to twenty-one days where the worker has been in the employment of the same employer for five consecutive years. Official and religious holidays and weekly rest days shall not be counted as part of a worker's annual leave unless they fall in its course. There are also clauses for sick and Haj Pilgrim as well as close family member death as well as spouse relocation accompaniment leaves. Maternity leave is for 3 months.

### **d. Termination and Disciplinary Action:**

Article 48 restricts **disciplinary actions** that can be taken by the Employer. The Employer may terminate employment of employee without notice in certain cases outlined in Article 28 (e.g. if the employee violated organization's internal rules including in work safety or safety of workers despite being twice warned). Details the severance payments owing are also included. Referring to ESS2, Para 12, the law appears to be silent regarding the requirement to provide written notice of termination and details of severance payments in a timely manner.

**Remedies in case of unjustified dismissal:** A worker who intends to challenge the validity of his/her termination must file a submission before the competent court within sixty days of his dismissal. If the court finds the dismissal arbitrary and in violation of the provisions of this Code, the employer may be ordered to reinstate the worker or pay him damages, in addition to compensation in lieu of notice and all other entitlements stipulated by the Labor Code (sections 32 and 33), provided that the total amount awarded shall not be less than the worker's remuneration for three months and not more than his remuneration for six months, and shall be calculated on the basis of the last remuneration he received. In case of worker's death, all his end of service entitlements stipulated by the Labor Code shall revert to worker's legal heirs, as if worker employment has been terminated by the employer.

### **e. Social Security Benefits and pension contributions:**

Article (62 -64) of the Social Security Law define the social security benefits and contributions required by the Employer. **Social Security law of 2010 and its amendments and articles 4, 24, 29, 42, 45, 48, 59** state that where workers who are subject to the Labor Law are also subject to Social Security regulations, regardless of nationality or type or term of employment contract, so long as the worker is paid at least minimum wage. Overtime payments or the value of meals are not subject to deductions for Social Security.

**f. Maternity leave, Labor Law articles 67, 70      Social Security Law article 44**

Women workers are entitled to 10 weeks fully paid maternity leave, six weeks of which must occur after delivery. An enterprise employing 10 or more workers must allow women to take up to one year of unpaid leave post-delivery, so long as they do not work for another employer during that time.

Maternity leave may be paid by social insurance if the worker has been covered by social insurance for at least 9 months preceding the entitlement.

**g. Breastfeeding breaks, labor law article 71**

During the first year after giving birth, women workers may take up to one paid hour off per day to breastfeed their babies

**h. Employer-provided childcare, labor law article 72**

An enterprise that employs 20 or more women must provide childcare during work time for the children under four years of age, if there are 10 or more children in that age group

**i. Limits on working hours for women, minister of labor decision in respect to activities and times during which it is prohibited to employ women, 2010**

Under Jordanian law, women may not work between 10:00 pm and 06:00 am. Exceptions require a decision from the Minister of Labor. The rest period for women must be at least 10 hours between each working day.

**j. Non-discrimination and Equal Opportunity**

The labor law is not explicit regarding non-discrimination and equal opportunity. However, the Constitution of the Hashemite Kingdom of Jordan, Article 6 states that all Jordanians are equal before the law, and prohibits discrimination on grounds of race, language or religion. Jordan has ratified the two core ILO conventions addressing discrimination in respect of employment and occupation: 1) the Equal Remuneration Convention No. 100 of 1951 (C100) and 2) the Discrimination (Employment and Occupation) Convention No. 111 of 1958 (C111).

The Jordanian Labor Law protects women from discrimination during pregnancy and while on maternity leave. Employers may not terminate women starting from the sixth month of pregnancy or during maternity leave. The labor law is not explicit regarding measures to prevent or address sexual harassment, intimidation or exploitation in the workplace. It is also vital to ensure pay equity for male and females.

**COVID-19 CONSIDERATIONS:**

**General overview**

The Jordan National Defense Law No. 13 of 1992 has come into force as of 17 March 2020 following a royal decree issued upon the recommendation of the Council of Ministers. The law grants the Prime Minister wide powers to undertake all necessary measures to combat the COVID-19 outbreak in the Kingdom, including the temporary suspension of ordinary legislation. The project and all workers will adhere to all effective defense orders throughout project implementation. The PMU is responsible for ensuring that all effective defense orders applicable to the project are adhered to.

NAF will keep all direct workers updated regarding any legislation that affects their daily work, using emails. In urgent cases, NAF will send an SMS to its direct workers to inform them of governmental measurements that must be adhered to. NAF will also ensure that any contracted firms abide by these requirements.

The Council of Ministers, in its session held on 17 March 2020, decided to implement a set of precautionary measures to hinder the spread of COVID-19. This included: the suspension of the works and closure of all ministries and official/public authorities; the suspension of the private sector (excluding the health sector and other vital sectors as determined and recommended by the Minister of Industry, Trade and Supply); and the adoption of the decisions of the Ministry of Labor regarding employee matters (Lockdown Decision). This lockdown is no longer applicable as per 08 June 2020, nonetheless, project employees are expected to adhere to any similar lockdown directions in the future.

The Council of ministers issued a total of nine defense orders. Defense orders number 1, 2, 3, 6 and 8 have been listed below as they are most relevant to the LMP.<sup>4</sup>

#### **Defense Order No. (1) Issued 19 March 2020 - Temporary Amendments to Social Security Law**

- Law.
- The obligatory social security insurance contribution ratio payable to the Social Security Corporation has been amended, for the three months of March, April and May 2020, as follows:
  - o Disability and death (excluding old age) insurance shall become 1% of the employee's wage, which is subject to deduction, payable by the employer
  - o Work injury insurance shall become 2% of the employee's wage, which is subject to deduction, payable by the employer.
  - o Maternity insurance shall become 0.75% of the employee's wage, which is subject to deduction, payable by the employer.
  - o Unemployment insurance shall become 1.5% of the employee's wage, which is subject to deduction, payable as follows: 0.5% payable by the employer; and 1% deducted from the employee.
  - o As such, the total monthly contribution is 5.25% of the employee's wage, which is subject to deduction, with 4.25% payable by the employer and 1% deducted from the employee (as opposed to the original contribution equivalent to 21.75% of the employee's salary

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<sup>4</sup> Defense Orders are accessible through <https://www.dentons.com/en/insights/articles/2020/april/21/covid-19-related-legislation-in-the-hashemite-kingdom-of-jordan>

subject to deduction, with 14.25% payable by the employer and 7.5% deducted from the employee).

- Further items to note under the Defense Order No. (1) in relation to social security are as follows:
  - o The employer may continue payment of the old age insurance in full, pursuant to the ordinary percentage as determined under the Social Security Law, prior to the issuance the National Defense Law, and may pay such insurance via instalments to the Social Security Corporation without any penalties being imposed thereon, provided the insurance is paid in full by the maximum date of 31 December 2023.
  - o All employees are entitled to continue payment of the old age insurance provided the employee pays an amount equivalent to 16.5% of his/her salary, subject to deduction.
  - o Penalties on late payment, and on contributions which have been amended, shall be suspended for the months of March, April and May 2020.

**- Defense Order No. (2) – Ineffective – Curfew and Lockdown**

Defense Order No. (2) was issued on 20 March 2020, imposing a curfew and lockdown on citizens, with some exceptions therefrom to certain persons/sectors. The lockdown/curfew is not effective as per June 11, 2020. Shall the order, or parts of it, get re-activated; NAF and project workers must adhere accordingly.

**- Defense Order No. (3) – Ineffective – Penalties in relation to Curfew and Lockdown**

Defense Order No. (3) was issued on 25 March 2020, providing for a number of penalties for those individuals who violate the provisions of Defense Order No. (2) in relation to lockdown. First: Any individual who violates the provisions of Defense Order No. (2) which prohibits the movement of people in all regions of the Kingdom, shall be subject to the following:

- o a fine ranging between JOD100 and JOD500 for first-time violations; imprisonment for a period not exceeding one year or a fine ranging between JOD100 and JOD500, or both penalties, for any repeated violation; seizure of any vehicle used during the 30-day curfew period.
- o Any person authorized to open his/her business, but who opens his/her business outside the permitted hours, shall be subject to a fine of not less than JOD1,000, and ordered to close his/her business for a period of 14 days.

**- Defense Order No. (6) issued on April 8, 2020 – Employment Conditions, including remote work, and Payment of Wages,**



Defense Order No. (6) was issued on April 8, 2020, outlining certain measures relating to employment conditions, payment of wages, temporary closure of entities/institutions unable to cope under the current circumstances, and making reference to the government Economic Protection Programmes. This defense order was amended on May 31, 2020. Below is a summary/overview of the contents and the amendment

- All employees in the private sector, or any other establishment subject to the provisions of the Labor Law No. 8 of 1996 (the Labor Law), shall receive their full wages for the period between 18 March 2020 until 31 March 2020. This applies to all establishments whether subject to the Lockdown Decision or otherwise.
- Employees excluded from the Lockdown Decision shall not be entitled to overtime work during the period between 18 March 2020 until 31 March 2020, unless they were asked to perform overtime work, pursuant to Article 59 of the Labor Law. The Defense Order No. (6) explains the payment for overtime work as follows: the employee is entitled to 125% of his/her hourly wage for every hour of overtime work performed during ordinary business days, and 150% of the employee's daily rate for every day worked during religious holidays and weekends, with the exception of public holidays (such as this lockdown period).
- Authorization for the Minister of Labor, the Minister of Industry, Trade and Supply, the Minister of Health, and any respective competent minister, to jointly lay the foundations and conditions required for any establishment in the private sector or any other entity subject to the provisions of the Labor Law, to be excluded from the Lockdown Decision, and be permitted to resume work. The mechanism of submission for such request shall be laid out in instructions issued by the aforementioned ministers. To date, such instructions have not been issued.
- In the event that any institution, which is encompassed under the Lockdown Decision, resumes operation without obtaining the necessary approval according to the above principles, it is liable to the penalty of closure for a period of 60 days;
- Suspension of the enforcement of certain provisions under the Remote Working Regulation No. 22 of 2017 (the Remote Working Regulation). It determined that institutions which are able to carry on work remotely, whether wholly or partially, shall be considered excluded from the Lockdown Decision, and employers are able to obligate their employees to work remotely if this serves the interest of the establishment.
- Authorizes the Minister of Labor to undertake the necessary measures to regulate remote working pursuant to instructions to be issued in this regard. These instructions have been issued on 13 April 2020 under No. 3 of 2020 (Instructions regarding Remote Working);
- Institutions subject to the Lockdown Decision: Employees therein shall be regarded as under official holiday with full pay.
- Amended Wages for Employees required at the workplace: where an establishment necessitates for the continuation of work that its employees be present at the workplace, such employees are entitled to their full wages. However, it is permissible to reduce the

salary of employees therein, provided such reduction does not exceed 30% of the ordinary wage, and provided the following conditions are met:

- employee's free consent to the proposed reduction;
  - such reduction to also apply to the salaries of the higher management employees in the institutions (such as the general manager, the finance manager etc.);
  - the reduction to apply to all employees equally;
  - salary after reduction to not fall below the minimum statutory wage; and
  - in any case, if the employee is requested to work overtime, the employee is entitled to 125% of his/her hourly wage for every hour of overtime work performed during ordinary business days, and 150% of the employee's daily rate for every day worked during religious holidays and weekends, with the exception of public/official holidays.
- For remote workers: Full-time employees: If such employees are working full time (eight hours daily), then they are entitled to full pay. The salaries of full-time remote workers are also subject to the 30% reduction in salary explained in item 7.5.2 above. The Instructions regarding Remote Working stipulate that if the employer imposes such reduction in salary, and the employee does not object thereto before the Ministry of Labor within a period of seven days from the effective date of reduction, then this shall be considered as free consent on behalf of the employee.
  - Part-time employees: Such employees are entitled to their wages for actual hours worked, provided the pay does not fall below the minimum rate per hour, or does not fall below 50% of his/her usual wage, whichever is higher.
  - In any case, if the employee has been asked to work overtime, the employee is entitled to 125% of his/her hourly wage for every hour of overtime work performed during ordinary business days, and 150% of the employee's daily rate for every day worked during religious holidays and weekends, with the exception of public holidays.
  - Employees not required to work: The Defense Order No. (6) has granted establishments subject to the Lockdown Decision, or those establishments which are only partially authorized to work, the right to submit a request to the Minister of Labor, seeking to reduce the salaries of employees, who are not required to work, by 50%, provided the salaries thereof do not fall below the statutory minimum wage. If such request is rejected, the establishment is obliged to continue payment of such wages in full. The mechanism thereof shall be further explained by instructions to be issued by the Minister of Labor. To date, these instructions have not been issued.
  - Establishments unable to continue payment of employee salaries: the Defense Order No. (6) has granted establishments in the private sector or those entities subject to the provisions of the Labor Law (whether subject to the Lockdown Decision or otherwise) which are unable to continue payment of employee salaries, even after the aforementioned reduction in salaries, the right to submit a request to a committee (comprised of the Minister of Labor and the Minister of Industry, Trade and Supply) to cease the entire operations of the establishment, and to suspend the employment

contracts of all employees therein. Such request shall be submitted through the website: [www.hemayeh.jo](http://www.hemayeh.jo).

- An employer must not undertake any related action until the request is approved by the committee. If such request is accepted, those employment contracts will be suspended, noting the following:
  - the establishment must enclose with the request, a list of the names of the employees, their respective nature of work, type of employment contract, term, working hours, and salaries, pursuant to what is registered with the Social Security Corporation;
  - the establishment must not carry out work throughout the requested suspension period;
  - the suspension of the employment contracts does not cancel or terminate the employment relationship. However, during the suspension period, the employer shall not pay wages to its employees;
  - the suspension period shall not count towards the term of employment;
  - the establishment continues to be liable towards employees in regard to all contractual and financial obligations, excluding the payment of wages;
  - a disposal ban shall be placed on all movable and immovable property owned by the establishment throughout the suspension period;
- Government Incentive: the government will grant incentives to establishments committed to payment of employee salaries in full throughout the enforcement of the National Defense Law, and establishments subject to the Lockdown Decision and prohibited from work during the lockdown period may also benefit from economic protection programs. The Defense Order No. (6) has noted that instructions will be issued outlining such programs and the requirements thereof. To date, no instructions have been announced.
- Termination of employment contracts: termination of an employment contract is permitted, during the lockdown period, in the following instances only;
  - death of the employee or the employee's inability to perform work, provided the same is supported by a medical report;
  - the employee fulfils the requirements of retirement under the Social Security Law;
  - the employee impersonates another individual or presents false certificates or documentation with the purpose of procuring a benefit himself/herself, or brings detriment to another;
  - the employee is convicted, by a judicial ruling of final degree, of a felony or misdemeanor
  - the employee is found in a state of intoxication or other psychotropic substance, or commits an act violating public morals in the workplace;
  - the employee assaults his/her employer, responsible manager, any of his/her superiors, another employee or any other person during work or, as a result thereof, by battery or insult.

- As for the employees who are absent from work for a period of 20 intermittent days or 10 consecutive days in one year, and the employer wishes to terminate such employment, then this matter is subject to the discretion of the Minister of Labor who has been authorized to undertake the necessary measures and procedures to deal with such instance.
- Defense Order No. (6) obliged each establishment which has forced an employee to resign, or terminated the employment of an employee outside the instances outlined in item 7.9.1 above, during the period between 18 March 2020 and 8 April 2020, to reinstate the employee to his/her position, within one week from 9 April 2020. Pursuant to guideline explanations from the Ministry of Labor, employees who are under limited term employment contracts and the terms of which have expired, as well as employees under probation, are excluded from this item
- Defense Order No. (6) has also decided to nullify any commitment, agreement or document in which an employee waives any of his/her rights as of 18 March 2020, and has obligated the establishment to take the necessary measures to cancel the same within one week from 9 April 2020.
- Penalties: Defense Order No. (6) has imposed a penalty of imprisonment for a period up to three years and a fine of JOD3,000 for any person who violates its provision and any other relevant announcement. The imposition of these penalties does not affect employees claiming their rights in accordance with the provisions of the Labor Law.

#### **Amendments to Defense Order No. (6):**

On May 31, 2020; the prime minister amended Defense Order No (6) to as per the following;

- Sectors most impacted by the coronavirus crisis can deduct 30 per cent of workers' salaries based on a mutual agreement involving the consent of employees working full-time both on-site and remotely.
- The (Most affected sectors) announced by the decision also stipulates that workers who are not performing any work can have 60 per cent of their salaries deducted, with no consent required by the worker or the Labor Ministry, under the condition that their salaries do not fall below JD150 once the deduction is implemented.
- Employers of the (most-affected) sectors can task their employees who are not working, to do remote work for four hours without being paid any more than the per cent of their salaries that they receive.
- Sectors not listed by the Prime Ministry and the Ministry of Industry, Trade and Supply on the "most affected sectors" list, employers can still deduct 50 per cent of the salaries of employees who have not been working since the defense order was issued, with no need for their consent, granted that the remaining amount is not less than minimum wage.
- Employers can deduct 50 per cent of the annual leaves of employees not performing any work on the field or remotely, under the condition that they have not worked for 30 days, consecutive or not, from when Defense Order No. 6 came into effect until the announcement on Sunday.

- To protect employees' jobs, any employee whose contract ended by April 30 must have their employers automatically renew it for them, cancelling any prior decisions and ensuring that the contract remains valid until the defense order is no longer in effect. After this, renewals can only be made by agreement between employer and employee. A condition for renewal is that the contract must have been renewed three times before April 30. Otherwise, employers can end the services of their employees as per article 28 of the Labor Law. Employees are permitted to submit a complaint to the ministry "if they feel their services were unjustly ended", according to the announcement.
- The list of the most-damaged sectors for May of 2020 includes tourism facilities, popular restaurants and sweet shops, recruitment facilities, recruitment agencies for domestic workers, public transport, newspapers, companies that organize conferences, exhibits and festivals, avian, land and sea transport and wedding halls and companies that rent wedding equipment. They also include gyms, swimming pools and baths, cultural centers, clothing, shoes and accessories shops, schools and kindergartens, tourism vehicle rental companies, fitness centers, vocational training centers, recreational and public parks, cinemas and theatres, coffee shops and cafes, advertisement and TV production companies, social and charitable associations, private-sector museums, special private-sector care centers and offices for real-estate companies, law firms and auditing.

The announcement said that the list will be reviewed for June's salaries based on developments.

### **Defense Order No. (8)**

Defense Order No. (8) was issued on 15 April 2020 and relates to protecting public health and limiting the spread of the coronavirus. It outlines several actions to be carried out by all Jordanians and foreign residents alike, currently present in the Kingdom, including:

- all individuals must immediately notify the competent authorities if they are infected by the coronavirus. They must also inform the authorities if they have come into close contact with an individual who has contracted the virus, and disclose any infection they are aware of
- all individuals must adhere to the decisions, measures and procedures laid out by the competent authorities and the Epidemic Investigation Committee, including medical quarantine and home lockdown
- all individuals must respect the privacy of patients infected by the virus or those being suspected of having the virus, and refrain from sharing any private information relating to any COVID-19 patients, or take part in disseminating such information through social media or otherwise;

**Defense Order No. (8)** imposes an obligation on all hospitals, medical centers and medical laboratories to disclose to the competent authorities the presence of any confirmed COVID-19 cases therein.

Failure to adhere to the provisions of Defense Order No. (8) may subject the person to imprisonment for a period up to three years, or a fine of JOD3,000 or both penalties.

**Defense Order No. (9):** Defense Order No. (9) was issued on 17 April 2020, wherein the government introduces several measures to safeguard the economy and workers alike through symbiotic programs

## 5. BRIEF OVERVIEW OF LABOR LEGISLATION: OCCUPATIONAL HEALTH AND SAFETY

**Labor legislation applies to all direct and indirect workers hired under the project.**

**Public Health:** Public health protection is assured under the **Public Health Law (No. 54, 2002)**. According to this Law, issued by a Royal decree in 2002, the Ministry of Health is responsible for all health matters in the Kingdom, and in particular:

- Protecting health through providing preventive and curative services as well as monitoring responsibilities
- Organizing and supervising health services provided by the public and private sector
- health insurance for citizens;
  - all NAF workers are covered under the health insurance, which covers the employee and his/her direct family members<sup>5</sup>. Monthly subscriptions for health insurance are deducted from the employee's salary in line with the Jordanian labor Law. The health insurance provides full treatment coverage for illness and injuries, in exception for run-over accidents. Employees can choose to add additional individuals under their health insurance (extended family members) for an increased amount of monthly subscription.

Annual sick leaves are granted for a maximum of 14 days, subject to receiving medical reports

Additionally, the Social Security Cooperation(SSC) provides financial compensations in case of work injuries. Work injuries are defined as physical injuries that occur either during working hours or during commuting time to work(one hour before official working hours or one hour after working hours). Injuries could occur inside NAF HQ, in NAF branches, during field visits or in the car NAF informs the Social Security Cooperation which sends a focal point to the injury location, to conduct field assessment that includes evaluating the location and causes of injury, asking involved individuals about the incident, and requesting medical reports. Based on the results of the assessment, the Social Security Cooperation might increase the social security allowance of the injured employee. If the injury is so severe that the employee could not perform work tasks permanently, the SSC will refer the employee to early retirement. Additionally, NAF supports the employees through flexible working hours as needed.

**Articles under Chapter 9 titled “Safety and Occupational Health”** cover the obligations of the employer to provide a safe working environment for workers.

**Articles under Chapter 10 (titled “Work Injuries and Occupational Diseases”)** provide for issues related to work injuries and occupational diseases for those employees who are not covered under the provisions of the **Social Security Law of Jordan**.

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<sup>5</sup> Direct family members: individuals who are listed in the same family booklet.

**Occupational safety and health (OSH) general provisions under the Labor law articles 78, 80, 85;**

In order to ensure the occupational safety and health of workers, the employer must:

- protect workers from work-related accidents and illnesses
- prior to employment, inform workers about work-related hazards and necessary precautions
- provide workers with necessary personal protective equipment (PPE), such as goggles, aprons, masks, gloves, and/or footwear
- guide workers in the use and maintenance of PPE, and
- Protect workers from fire hazards.
- Workers are not required to pay any costs for these measures.

**First aid, 1997 decision on medical aid means and devices for workers**

The employer must provide first aid supplies that are sufficient for the nature of work and the number of workers.

**Welfare facilities, 1998 instructions for protection of workers and establishments from workplace hazards**

The employer must provide a break room where workers can rest and eat.

**Protection for Pregnant and Breastfeeding Women Minister of Labor Decision in Respect to Activities and Times During Which it is Prohibited to Employ Women, 2010**

In Jordan, pregnant and breastfeeding women may not engage in:

- Work that requires exposure to fumes or smoke from any petroleum derivatives, or
- Work that requires exposure to ethylene in tinting, or Sulphur dioxide in artificial silk.

Additionally, breastfeeding women get an hour for breast feeding daily.

**COVID-19 CONSIDERATIONS:**

The government has issued the below regulations addressing health safety issues in the workplace that are relevant to COVID-19, consistent with international industry practice related to prevention of communicable diseases and are designed to capture the measurements applied by the Government throughout the COVID-19 outbreak, thus still effective. The below regulatory guidelines are directly linked to the project as they provide the detailed steps that NAF workers need to abide to in the workplace post COVID-19 and the changes on payment services that guarantee higher levels of safety for both workers and beneficiaries .

- “Roadmap to return to work after the Corona pandemic (Civil Service Bureau) this regulatory roadmap is in line with WHO’s Workplace-related advice for COVID-19<sup>6</sup> and provides principles and detailed steps for going back to the physical work environment post COVID-19, including; selecting the persons that will work on site, developing a plan for the operations that will be effective on site, communication messages with employees and the public, preparing the physical

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<sup>6</sup> ; [WHO guidance getting your workplace ready for COVID-19](#)

space through applying sanitization and social distancing measures, and monitoring activities. This is applicable to the move from remote working to working from NAF HQ and branches, post lockdown.

Link to the Roadmap: <http://www.pm.gov.jo/upload/files/Returning-Work.pdf>

- Payment Systems and the use of Electronic Payment Services during the Corona Virus Pandemic, (Central Bank of Jordan); which aims to promote the use of electronic payment services during the pandemic and apply procedures to protect the national economy. In specific, measurements related to the use of digital cash transfer as opposed to payments cash-out will limit the risk of exposure to the virus.
  - Link to the Payment Systems and the use of Electronic Payment Services during the Corona Virus Pandemic: <https://www.cbj.gov.jo/EchoBusv3.0/SystemAssets/PDFs/2020/April/CBJ%20Procedure%20E.pdf>

Additionally, NAF received a letter from the Prime Ministry on preventive and health measurements that should be taken into consideration, in line with the measurements mentioned in the “Roadmap to return to work after the Corona pandemic”; NAF’s management issued an official letter to inform branches and employees of the aforementioned measurements

In terms of indicating and reporting potential cases, NAF have received an official order from the Ministry of Health(MoH) which obligates all governmental institutions (NAF included) to report any case that has COVID-symptoms so that they get tested by MoH centers. If a case is identified then all workers will be tested again, in addition to testing any individuals in the country that have socialized with the COVID-19 patient. This includes family members and community members of the patient, who are identified by the patient and who live in the same neighborhood. Additionally, the Government of Jordan is advocating that residents in the country download an App called “Aman” which tracks points of overlap between citizens and any COVID-19 patients.

AMAN works on two interconnected levels. Firstly, the App operates by saving user location data, exclusively on the user’s phone, to examine and compare the movements of users in parallel to those of Coronavirus carriers identified by the Ministry of Health. Should a locational overlap occur between users and Coronavirus carriers later identified as patients, AMAN alerts its users about a possible exposure to the virus and provides instructions about home isolation and contacting authorities. Secondly, should a user be diagnosed with Coronavirus, retracing the user’s movements in the 14 days prior to their diagnosis would be attainable and easily accessible through AMAN which provides information such as dates, times, and places. This functionality aids in notifying other users who happened to be in the vicinity of the diagnosed patient, which ultimately expedites diagnosis and controls the spread of the virus.<sup>7</sup>

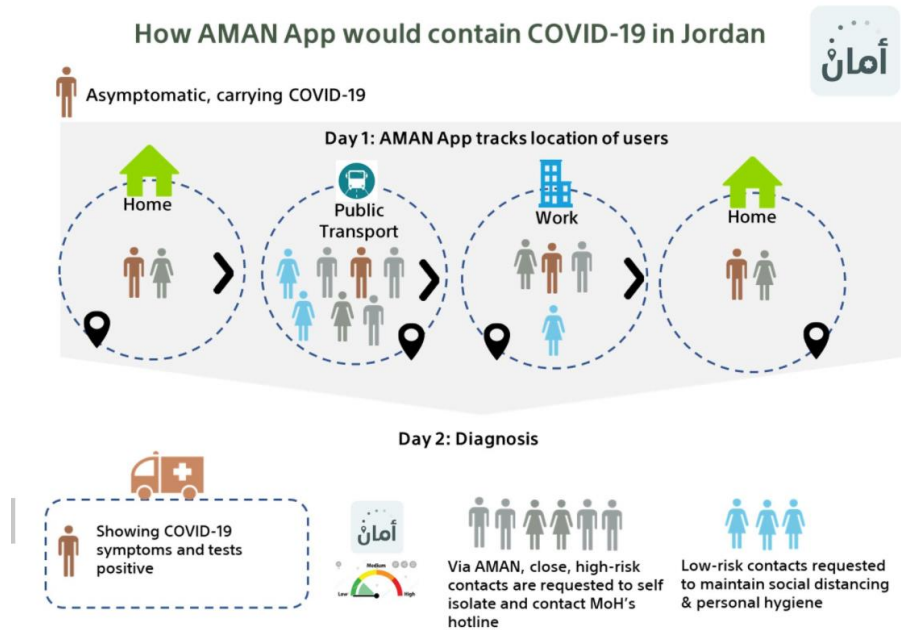
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<sup>7</sup> <https://www.amanapp.jo/>



**Figure 2: AMAN App Functionality**

Upon presuming the physical work in NAF, all staff have been tested for COVID-19 (post-lockdown). This measurement is taken by MoH and the “National Crisis Management Center” and will be applied as needed in case of future lockdowns.



## 6. RESPONSIBLE STAFF

Responsibility Area	Activities	Responsible Focal Point/s
Project Management, Monitoring and Evaluation	<ul style="list-style-type: none"> <li>○ Oversee the implementation process.</li> </ul>	Project Manager will liaise with all focal points to ensure that all the procedures are met
	<ul style="list-style-type: none"> <li>○ Ensure that third- party firms adhere to this labor management procedure and occupational health and safety plan, as part of the contractual process and throughout activities implementation.</li> </ul>	<p>The <b>Procurement Officer</b> will make sure that LMP are reflected in all contractual agreements</p> <p>The <b>Monitoring and Evaluation Officer</b> will make sure that they are adhered to and will reflect this in project reports. He/she will conduct field visits, meetings, and review reports to monitor that contractors;</p> <ul style="list-style-type: none"> <li>○ Maintain records of recruitment and employment process of contracted workers</li> <li>○ Communicate clearly job description and employment conditions to contracted workers</li> <li>○ Develop, and implement workers' grievance mechanism and address the grievance received from the contracted and sub-contracted workers</li> <li>○ Have a system for regular review and reporting on labor, and occupational safety and health performance</li> <li>○ Deliver regular induction (including social induction) and HSE training to employees.</li> <li>○ Ensure that all contractor and sub-contractor workers understand and sign the Code of Conduct prior to the commencement of works, including articles on prevention of Sexual exploitation, sexual harassment and Gender Based Violence.</li> <li>○</li> </ul>
	<ul style="list-style-type: none"> <li>○ health and safety standards are met at workplaces in line with the national occupational health and safety legislation.</li> </ul>	The Monitoring and Evaluation Officer will monitor and report on health and safety standards and will liaise with the Ministry of Health, as needed. He/she will inform the project manager if H&S regulations are not adhered to by any unit or if sanitization supplies are not made available

GRM	<ul style="list-style-type: none"> <li>○ Ensure that the grievance mechanism for project workers is established and properly Implemented</li> </ul>	<p>The GRM tools and process is handled by the <b>HR Manager</b> in NAF and the <b>M&amp;E Officer</b> under the PMU; for workers to channel grievances through them.</p> <ul style="list-style-type: none"> <li>➤ The Project Manager will make sure that the tools are a)available at both focal point's officer and b)will request a random sample of submitted grievances, to make sure that escalation and resolution processes were properly followed.</li> </ul>
Capacity Building	<ul style="list-style-type: none"> <li>○ Map skills gaps and training needs of NAF staff.</li> <li>○ Preparation of comprehensive training plans, including trainings of Trainers (ToTs) to NAF Heads of Units, HR Manager and third-party management</li> </ul>	<p>The Monitoring and Evaluation Officer will be responsible of developing skills mapping tools and comprehensive training plans. He/she should also liaise with technical focal points of each stream and request the support of NAF development partners as needed.</p> <p>In specific, the M&amp;E officer will;</p> <ul style="list-style-type: none"> <li>- Coordinate with specialized UN agencies on training social workers on promoting awareness and detection of cases of gender- based violence.</li> <li>- Coordinate with the Ministry of Health to conduct an Occupational Health and Safety training for project workers, including social workers. This could be either delivered by MoH staff or could be cascaded the M&amp;E officer, post a ToT from MoH.</li> <li>- Ensure that GRM trainings are conducted by the GRM focal point as needed.</li> </ul>
COVID-19 Communications	<ul style="list-style-type: none"> <li>- Ensure high level of awareness amongst NAF staff of COVID-19 related updates and regulations</li> <li>- Integrating COVID-19 communication protocols in NAF communication strategy.</li> </ul>	<p>The communication officer in NAF is responsible of tracking the defense orders, key updates on the COVID-19 situation, and drafting key messages and updates; to be circulated to staff on needs basis.</p>

## COVID-19 CONSIDERATIONS

NAF PMU manager must reach out to the Ministry of Health to arrange for a training that involves regional focal points from NAF and the M&E officer. The trained staff will be equipped with the needed information and will later cascade the training to all NAF staff in HQ and branches (that are working during the COVID-19 outbreak), as well as contractors.

The M&E officer will be responsible of developing the training schedule and monitoring the delivery process (preferably virtual training sessions). He/she will also monitor that all OHS measurements in relation to COVID-19 are properly applied and that project direct and contracted workers have access to complaints and grievances, if at any stage they feel that the preventive measurements are not applied efficiently.

The communication officer will track new defense orders from the government and will afterwards draft official letters/announcement to NAF staff in HQ and branches; listing the new regulations from the government. The official letters will be sent via email/ mail from NAF HQ management (Director General Office) to all heads of units in HQ and branches managers across governorates

Quarterly reporting reports will include indicators related to the application of safety measures relating to COVID-19, including activities on Raising awareness and training of workers in mitigating the spread of COVID-19

## 7. POLICIES AND PROCEDURES

The Project will operate in compliance with the Jordanian Labor Law and this LMP.

The significant labor risks for the project have been highlighted in Section 3 – Physical risks, exposure to workplace violence, and stress .

In terms of **physical risks** related to dealing with disgruntled individuals, NAF focuses on ensuring a transparent eligibility method, clear communication messages, a GRM mechanism; which are meant to strengthen the trust between the government and beneficiaries, thus preventing such incidents.

To provide indirect protection to workers, all workers in branches and in HQ are trained on the use of an automated system that shows calculated scores and rejection reasons of each individual case. NAF staff are also trained on providing the needed explanation on the used indicators and the automatically calculated score (not a human decision).In addition, they are trained on explaining and guiding beneficiaries to use GRM forms and tools, if they still feel dissatisfied and wish to escalate. Additionally, a guard is placed in NAF big branches and is authorized to intervene as needed or contact the police. Such incidents have never occurred against NAF staff.

If workers get injured to their exposure to wires, nails, warped steps and floorboards during home visits, during working hours or during commuting time to work(one hour before official working hours or one hour after working hours). NAF informs the Social Security Cooperation which sends a focal point to the injury location, to conduct field assessment that includes evaluating the location and causes of injury,

asking involved individuals about the incident, and requesting medical reports. Based on the results of the assessment, the Social Security Cooperation might increase the social security allowance of the injured employee. If the injury is so severe that the employee could not perform work tasks permanently, the SSC will refer the employee to early retirement.

Additionally, all staff are covered under health insurance and will be treated of their injury, regardless of the level of severity.

### **Exposure to Workplace Violence or Harassment**

Project workers, particularly female workers, may be at risk of gender-based violence or harassment from co-workers. In response, the project will focus on both prevention and reporting mechanisms. The latter will be based on already established and used methods by NAF as part of GM for workers.

In terms of prevention, a training will be provided to NAF workers on identification and definition of GBV and workplace harassment. The training will be split into two parts; a) identification and referral of potential GBV cases amongst beneficiary households and b) definition of GBV cases in the workplace, reporting and GRM mechanisms for them. NAF will seek support from UN partners specialized in GBV prevention trainings. For further details on the GRM mechanism for staff, refer to section10 (Grievance Mechanism).

### **Stress Related Illnesses**

Social workers and workers in general might face stress related to work pressure and daily interactions with vulnerable households, especially during COVID-19. The project will provide staff with the required knowledge to identify when they are facing mental challenges due to stress, including being burnt out. Afterwards, it will equip them with basic cognitive mechanisms that could be followed in times of stress, while raising awareness on the importance of reaching out to physiologists and therapists as needed, noting that the governmental health insurance includes mental health under its coverage package; contact information will be provided of specialists that are covered under insurance.

## **COVID-19 CONSIDERATIONS**

The project has identified a significant risk related to protecting direct and indirect workers against COVID-19 risks exposure related to the COVID-19 impact. As part of the LMP, NAF (represented by the NAF management, concerned Head of HR and Procurement section and the PMU) will ensure the provision of preventive and protective measures, in line with the Ministry of Health and WHO regulations. All measures identified in the guidelines issued by the Jordan Service Bureau in the “Roadmap to return to work after the Corona pandemic” will be applied<sup>8</sup>. All COVID-19 related regulations and mechanisms are communicated to workers through emails and official letters directed from NAF HQ management to heads of branches. The communication officer, under the PMU will track amendments to defense orders and new regulations, then will draft the prementioned official letters

which are mailed/emailed from the Director General's office. Preventive and Protective Measures:

- Ensuring that contractual agreements made with third-party contractors at the time of COVID-19 include articles on following this OHS
- Direct of contracted workers who have underlying health issues will be allowed to work remotely.
- Provision of sanitization stations at the entrance and sanitization kits in each office, for the use of staff as well as beneficiaries
- Free and mandatory COVID-19 testing for all NAF workers in HQ, by MoH. This has been done post-lockdown and resuming on-site work
- Provision of masks, gloves, hand sanitizers and shoes cover for staff in the field; including contracted workers.
- Desks in HQ and branches will be re-organized to be at least 6 feet (around 2 meters) apart from each other; in offices with natural ventilation.
- Waiting areas in NAF and at third-party contractors will be re-organized to allow a seating space of 6 feet (around 2 meters); with natural ventilation
- Cleaning services will include sanitizing surfaces from 1 to 3 times/day; depending on the regularity of space usage.
- Monitor daily sanitization before the onset of day-to-day work and inspection to be conducted every hour and a half
- NAF management could request permits for workers who need to be present in other governorates or use their vehicles at all days, following the governmental procedures.
- Ensuring that contractual agreements made with third-party contractors at the time of COVID-19 include articles on following this OHS
- Direct of contracted workers who have underlying health issues will be allowed to work remotely.
- Provision of sanitization stations at the entrance and sanitization kits in each office, for the use of staff as well as beneficiaries
- Free and mandatory COVID-19 testing for all NAF workers in HQ, by MoH. This has been done post-lockdown and resuming on-site work
- Provision of masks, gloves, hand sanitizers and shoes cover for staff in the field; including contracted workers.
- Desks in HQ and branches will be re-organized to be at least 6 feet (around 2 meters) apart from each other; in offices with natural ventilation.
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- Monitor daily sanitization before the onset of day-to-day work and inspection to be conducted every hour and a half

NAF management could request permits for workers who need to be present in other governorates or use their vehicles at all days, following the governmental procedures.

- a) training of project workers and maintenance of training records;
  - Direct and contracted workers will be briefed on the OHS by NAF HR and the PMU M&E officer (preferably with the presence of a health expert from the Ministry of Health).
- b) documentation and reporting of occupational accidents, diseases and incidents;
  - Maintaining a record of those present at the job site daily to submit it to the competent authorities if necessary.
  - If any worker has COVID-19 gets COVID-19, NAF management will immediately report the case to MoH and all workers should immediately get tested. This is the current practice based on the Ministry of Health guidelines that are mandatory to all governmental institutions. Tests are free of charge in governmental institutions.
- c) Protocol of Handling potential and infected cases  
If NAF suspects that one of its workers is infected, this person will be mandated by his/her supervisor to get tested for free for COVID-19, at MoH health centers.  
Following governmental instructions, NAF is mandated to inform the Ministry of Health (MoH) of any confirmed cases of COVID-19 amongst its workers. Following that, MoH provides free COVID-19 testing for all persons who have interacted with him/her; whether in a work or non-work environment. Additionally, NAF will conduct full sanitization for the building if any proven case is identified.

*FIGURE 3: Sanitization Devices/Room that has been installed in NAF, as part of the preventive measurmets; mandatory sanitization in the entrance for walk-ins into the main building as well as workers. These two rooms have been installed in HQ noting the high number of visitors during times of lockdown when other branches are not fully operational.*



## 8. AGE OF EMPLOYMENT

The Emergency Cash Transfer Project will follow and abide by the Jordanian Labor law concerning the minimum age of work. The minimum age in Jordan is 16 years, providing that the work is not hazardous and other requirements are met under article 75 (e.g. not employed more than 6 hours per day). **The PMU and the contractors will not employ workers on the project below 18 years of age.**

A copy of the prospective employee ID or passport is required during the recruitment process and prior signing the contract for all project workers including contract workers. In the circumstances where these documents are not available the Affidavit of Birth will be used.

## 9. TERMS AND CONDITIONS

**Direct Workers** under the Project Management Unit (PMU) are governed by Civil Servants Regulations whilst **Contracted Workers** are governed by the National Labor Law and its legislations; pertaining to fixed term contracts, including working hours, minimum wages, working days, and hiring/firing procedures. For specific details, refer to section the **Terms and Conditions of Employment, under Section two**. NAF will administer any changes in OT, wages, changes in social security that will be applied, in accordance with any defense orders. Contractors are required to do same.



## COVID-19 CONSIDERATIONS

All changes in wages, working hours and mobility regulations will be administered by NAF, in accordance with defense orders. Contractors are also obliged to do the same.

## 10. GRIEVANCE MECHANISM

Workers could also choose to directly contact the M&E officer and/or the HR manager; to file complaints and grievances. Received complaints by the HR manager are dealt with based on the protocols of a) handling the cause with privacy b) asking the complainant to write a description of their complaint c) investigating the complaint in a transparent matter and taking the corrective measurements, including escalation and forming complaints committees as explained below (Figure 4)

A complaints committee gets formed on annual basis or every two years. The committee is formed from the HR Manager, a representative from the quality assurance department, and a senior staff member that is appointed by the Director General (preferably a legal advisor when possible). This committee reviews all complaints received on administrative procedures such as requirement.

In case of Complaints related to harassment, workers could file a complaint to the HR manager or to their direct supervisor, the case gets escalated to the Director General who submits a request to the Secretary General or the Minister of Social Development to form an "Investigation and Verification" Committee

If a worker wants to submit a complaint in relation to harassment, processes, recruitment results or processes; he/she could either submit the complaint to the HR manager or direct supervisor. In case of harassment complaints, he/she could wish to directly contact the Director General. Workers will submit a written complaint that includes the name, ID, phone number, subject of complaint, and details of the incidents.

In case of complaints related to administrative procedures, processes, or discrimination, the complaint receiver will either a) resolve the case through meeting with both parties and documenting reached agreements or b) escalate the complaint to the "Specialized Complaint Committee", which gets formed on annual basis or every two years and includes the HR Manager, a representative from the quality assurance department, and a senior staff member that is appointed by the Director General (preferably a legal advisor when possible). This committee reviews all complaints received and issues a decision on suitable corrective measures and any penalties that might apply. The decision is documented and archived, the M&E officer in the PMU should ensure that decisions made by the committee, regarding project workers, are adhered to.

In case of Complaints related to harassment, workers could file the complaint to the HR manager, to their direct supervisor, or directly to the Director General. If submitted to the HR manager or the supervisor, the case gets escalated to the Director General who submits a request to the Secretary General or the Minister of Social Development to form an "Investigation and Verification" Committee. This committee works on taking the needed measures against the harasser (including applying penalties, firing the

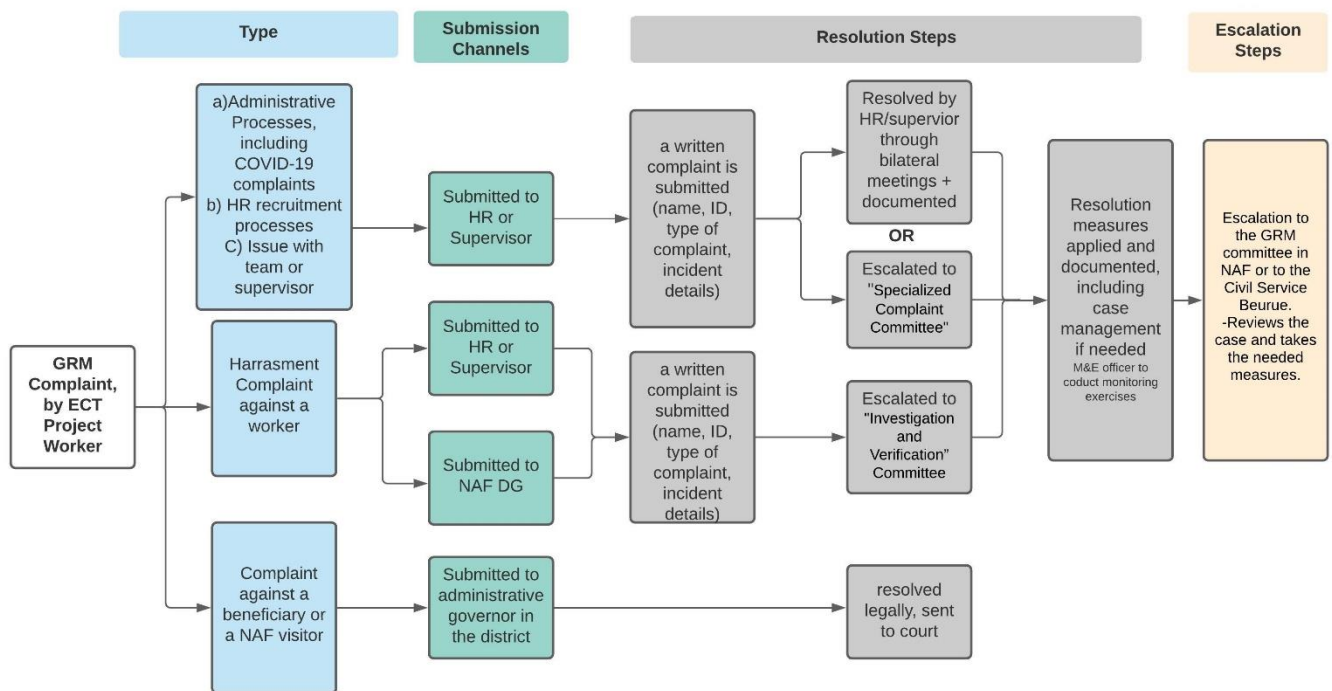
harasser) and support the harassed person, case management is provided through the case management system in Ministry of Social Development, if needed and based on the request of the complainant.

In the case of assault by dissatisfied beneficiaries, the worker or NAF management can choose to submit an official complaint to the local Administrative Governor the case is afterwards handled legally.

If the complainant is not satisfied with the decision made by any of the committees, he/she could escalate to the GRM committee in NAF or to the Civil Service Bureau; which reviews the case and takes the needed measures.

The GRM committee in NAF is formed from impartial focal point from various sections in NAF and is responsible of reviewing and resolving the prementioned cases. The committee maintains objectivity in terms of handling the complains and documents the incidents, complaints and procedures taken. If at any future occasion, the committee receives a potential reprisal complaint from a staff member who was previously complained against; they make sure to take this history into consideration while handling the case. Across the GRM Processes, the complainant may request to keep their identity anonymous, for further protection.

**Figure 4: GRM Processes for ECT Project Workers**



## COVID-19 CONSIDERATIONS:

Workers may submit a complaint using the mentioned above methods regarding any COVID-19 related concerns that they have (e.g. if a worker wants to complain that COVID-19 safety measures are not sufficiently applied or if he/she has a complaint that one of the workers has COVID-19 symptoms. COVID-19 complaints will be handled as a top priority case and will be dealt with using the same standard processes but with a concerted timeline of 3 days.

Additionally, a special hotline (193) for the Civil Defense Directorate (CDD) has been activated around the clock for people to report any infected person, those in contact with the infected or any suspected case, stressing that any reports received are confidential. All workers should be informed about this measurement. In addition, the M&E officer should ensure handling COVID-19 related concerns with sensitivity and acting upon any concerns related to preventive measurements, within 24 hours; including discussing the complaint with NAF HR Manager and the PMU Manager.

Complaints by employees in regarding to defense orders could be submitted on [www.hemaya.jo](http://www.hemaya.jo), a platform developed by the Ministry of Labor. NAF, through the PMU will ensure that project contracted workers are aware of the platform

**Figure 4. Hemaya Platform**

## 11. CONTRACTOR MANAGEMENT

Based on the Project's Procurement Strategy, the project will finance mainly firm/IC consultancy services, as will be reflected in the procurement plan. The main contractors to be financed under the project include

- (i) The contracted IT company which will be responsible of upgrading and enhancing the National Unified Registry NUR and the NAF MIS
- (ii) Verification auditor
- (iii) Data collection firm; including contracted enumerators

As per the Project Procurement Strategy, due to the simple nature of the project activities, majority of firms as well as the individual experts, are available in the national market and national procurement procedures and documents will apply. Others if necessary, can be sourced from international market under International Competitive Bidding using World Bank Standard Procurement Documents. The procurement documents, when used, will include non-compliance remedy for possible violation of E&S provisions.

To ensure smooth implementation of the project and in order to expedite procurement transactions, a Special Tendering Committees (STC) at NAF will take on the responsibility of procurement activities and handle all communications with the Bank and the technical teams regardless of estimated contract amount.

**Contracted Workers** will also be subject to the terms and conditions set out in the procurement documents governed. It is recommended that procurement documents include the following clauses:

- Compliance with National Labor Law
- Third party contractors shall have a quota for hiring women in the data collection activities for social inclusion purposes
- All workers shall have written contracts specifying terms and conditions of employment.
- Minimum age of work is 18 years.
- Non-discrimination clause shall be included in procurement documents: There will be no discrimination with respect to any aspects of the employment relationship, such as recruitment, compensation, working conditions and terms of employment, access to training, promotion or termination of employment and ensure fair treatment of all employees:
  - Applications for employment will be considered fairly.
  - Clear job descriptions will be provided in advance of recruitment and will explain the skills required for each post.
- The contracted workers will not pay any hiring fees. If any hiring fees are to be incurred, these will be paid by the Employer ('Contractor').
- The contracted workers should understand and sign the Code of Conduct prior to the commencement of work, in line with the code of conduct signed for direct workers, including articles on prevention of Sexual exploitation, sexual harassment and Gender Based Violence.

Whilst, the management aspect will be undertaken by the PMU project Manager in coordination with NAF HR. The procurement manager will provide overall supervision to ensure sector norms and standards are followed.

The PMU will be responsible for oversight of compliance of their direct workers and training of contractors. Subcontracting of work to non-registered firms will not be authorized. Orientation on rights and regulation, in addition to COVID-19 related measurements will be provided by the M&E officer of the

PMU, in coordination with NAF HR and Procurement Manager. The M&E officer will apply the “Training of Trainers” method; through selecting a number of focal points to be equipped as “trainers” for the subject matter. Afterwards, each trainer will be responsible of a region to cascade the training to workers in it.

## **COVID-19 CONSIDERATIONS**

NAF should clearly mention in the bid that the contacted firm will have to abide by COVID-19 governmental regulations including defence orders, in addition to the “Roadmap to return to work after the Corona pandemic (Civil Service Bureau) and the Payment Systems and the use of Electronic Payment Services during the Corona Virus Pandemic (Central Bank of Jordan). In addition, regulations specified in this LMP which include provision of gloves, masks and training of workers on health preventive measurements.

- NAF will include contractual provisions and procedures for managing and monitoring the performance of contractors, in light of changes in circumstances prompted by COVID-19
- The contracted firm must provide medical insurance covering treatment for COVID-19, sick pay for workers who either contract the virus or are required to self-isolate due to close contact with infected workers and payment in the event of death
- The contractor firm must appoint a COVID-19 focal point with responsibility for monitoring and reporting on COVID-19 issues and liaising with the PMU M&E officer.

## **12. COMMUNITY WORKERS**

The project doesn't recruit community workers.

## **13. PRIMARY SUPPLY WORKERS**

Not applicable. There are no primary suppliers for this project.