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PROJECT PAPER

FOR

A SMALL RETF GRANT
REQUESTING FUNDING FROM THE STATE AND PEACE-BUILDING FUND (SPF)
(US\$ 2.5 MILLION EQUIVALENT)

TO THE

JUSTICE CENTER FOR LEGAL AID OF THE HASHEMITE KINGDOM OF JORDAN

FOR A

ENHANCING DELIVERY OF JUDICIAL SERVICES TO POOR JORDANIANS AND
REFUGEES IN HOST COMMUNITIES PROJECT (P157861)
March 2016

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CURRENCY EQUIVALENTS

(Exchange Rate Effective March 15, 2016)

Currency Unit = JOD

US \$1 = 0.71 JOD

JORDAN FISCAL YEAR

January 1 – December 31

WORLD BANK GROUP FISCAL YEAR

July 1 – June 30

ABBREVIATIONS AND ACRONYMS

CPF—Country Partnership Framework
FM—Financial Management
FPD—Family Protection Department
GDP—Gross Domestic Product
GNI—Gross National Income
JCLA—Justice Center for Legal Aid
JRPSC—Jordan Response Platform for the Syria Crisis
JRP—Jordan Response Plan
JSDF—Japanese Social Development Fund
M&E—Monitoring and Evaluation
MoJ—Ministry of Justice
MoSD—Ministry of Social Development
NGO—Non-Governmental Organization
PSD—Public Security Directorate
PDO—Project Development Objective
RETF—Recipient-Executed Trust Fund
SPF—State and Peace Building Fund
UNRWA—United Nations Relief and Works Agency

Regional Vice President:	Hafez M.H. Ghanem
Country Director:	Ferid Belhaj
Practice Director:	James Brumby
Practice Manager:	Hisham Wally
Task Team Leader:	Paul Prettitore/Fernando Fernandez-Monge

HASHEMITE KINGDOM OF JORDAN
Enhancing Delivery of Judicial Services to Poor Jordanians and
Refugees in Host Communities Project (P157861)

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DATA SHEET

Hashemite Kingdom of Jordan

Enhancing Delivery of Judicial Services to Poor Jordanians and
Refugees in Host Communities (P157861)

Small RETF Grant Project Paper

Basic Information		
Date: March 15, 2016 Country Director: Ferid Belhaj Practice Manager/Director: Hisham Wally Project ID: P157861 Instrument: RETF Team Leader(s): Paul Prettitore/Fernando Fernandez-Monge	Sectors: Law and justice (50%), Public administration- Other social services (30%), General public administration sector (20%) Themes: Other public sector governance (20%), Access to law and justice (20%), Legal services (60%) EA Category: C	
Recipient: Justice Center for Legal Aid		
Executing Agency: Justice Center for Legal Aid		
Contact: Hadeel Abdel Aziz	Title: Director	
Telephone No.: + 962796331193	Email: habdelaziz@jcla-org.com	
Project Implementation Period:	Start Date: 30-Mar-2016 End Date: 30-Mar-2019	
Expected Effectiveness Date: 15-Mar-2016		
Expected Closing Date: 15-Mar-2019		
Project Financing Data(US\$M)		
<input type="checkbox"/> Loan	<input checked="" type="checkbox"/> Grant	<input type="checkbox"/> Other
<input type="checkbox"/> Credit	<input type="checkbox"/> Guarantee	<input type="checkbox"/>
For Loans/Credits/Others		
Total Project Cost : \$2,500,000		Total Bank Financing : \$2,500,000
Total Co-financing :		Financing Gap :
Financing Source	Amount(US\$M)	
BORROWER/RECIPIENT		
IBRD		
IDA: New		
IDA: Recommitted		

Others: State and Peace-Building Fund	2.5
Financing Gap	
Total	2.5

Expected Disbursements (in USD Million)

Fiscal Year	2016	2017	2018					
Annual	661,524	1,005,112	833,364					
Cumulative	661,524	1,666,636	2,500,000					

Project Development Objective(s)

The development objective is to increase access to justice sector services for poor Jordanians, particularly women, and refugees in host communities through innovative service delivery reforms.

Components

Component Name	Cost (USD Millions)
Component 1: Enhancing Legal Services to Communities Impacted by the Refugee Crisis	1,225,157
Component 2: Increasing Legal Awareness and Information	569,082
Component 3: Capacity Building	469,131
Component 4: Project Management and Monitoring and Evaluation	236,630

Compliance

Policy

Does the project depart from the CPF in content or in other significant respects?	Yes []	No [X]
Does the project require any exceptions from Bank policies?	Yes []	No [X]
Have these been approved by Bank management?	Yes []	No [X]
Is approval for any policy exception sought from the Board?	Yes []	No [X]
Does the project meet the Regional criteria for readiness for implementation?	Yes [X]	No []

Safeguard Policies Triggered by the Project

	Yes	No
Environmental Assessment OP/BP 4.01		X
Natural Habitats OP/BP 4.04		X
Forests OP/BP 4.36		X
Pest Management OP 4.09		X
Physical Cultural Resources OP/BP 4.11		X
Indigenous Peoples OP/BP 4.10		X
Involuntary Resettlement OP/BP 4.12		X
Safety of Dams OP/BP 4.37		X

Projects on International Waters OP/BP 7.50					X
Projects in Disputed Areas OP/BP 7.60					X
Legal Covenants					
Name	Recurrent	Due Date			Frequency
Description of Covenant					
Team Composition					
Bank Staff					
Name	Title	Specialization	Unit	UPI	
Paul Prettitore	TTL/Senior Public Sector Specialist	Governance	GGO23	251150	
Fernando Fernandez-Monge	Co-TTL/Counsel	Governance	GGOJL	409880	
Hala Ballout	Operations Analyst	Operations	OPSPF	338084	
Walid H. Al-Najar	Financial Management Specialist	Financial Management	GGO23	460456	
Samira Al-Harithi	Procurement Analyst	Procurement	GGO05	364899	
Non Bank Staff					
Name	Title	Office Phone	City		
Locations					
Country	First Administrative Division	Location	Planned	Actual	Comments
Jordan	National, in all 12 governorates	National; in all 12 governorates	National; in all 12 governorates		Focus on areas and capital cities in the Central & Northern governorates where majority of Syrian refugees live (Amman, Zarqa, Irbid & Mafraq).

I. STRATEGIC CONTEXT

A. Country Context

1. **The Hashemite Kingdom of Jordan is a landlocked country in the Middle-East with a population of roughly 8 million.** It has a GNI per capita of US\$5,160 in 2014 (Atlas methodology).¹ Between 2010 and 2015, GDP grew at an average of 2.7% annually² with a poverty headcount of 14.4% in 2010.³ Shared prosperity, measured by consumption growth of the bottom 40% of the population, showed positive trends between 2006 and 2010, though Jordan's performance on this measure is modest in comparison to other upper middle income countries. Progress on reducing welfare inequality, measured by the Gini coefficient, was more erratic during the same period. One of the more unique aspects of Jordan's poverty profile is the relatively high levels of transient and seasonal poverty. Nearly 19% of Jordanians, though not officially considered poor, experience poverty in at least one quarter of the year, making them 'transient poor'. Combining the poor and transient poor means that 33% of Jordanians experience poverty during the course of a year.

2. **After four years of a steady recovery, Jordan's economy slowed down in 2015 due to the effects of security spillovers.** These spillovers include repercussions, particularly on tourism and trade, from the worsening of security situation in Syria and Iraq and total trade route closures with these two countries.⁴

3. **The security situation in neighboring countries continues to be Jordan's biggest development challenge, constraining its economic growth as well as squeezing its already strained public services.** To date, 635,324 Syrian refugees have registered with UNHCR in Jordan, while other estimates put the number of actual refugees much higher. While Jordan has hosted Palestinian and Iraqi refugees for decades, the current wave of Syrian refugees has created tremendous strain on Jordanian institutions and the services they provide. This strain has negatively affected provision of services to Jordanians, and created tension in communities hosting large numbers of refugees. It has also forced the Government of Jordan to create additional institutions, for example establishing a new family court in Mafraq, to help address the huge increase in demand for services caused by Syrian refugees.

4. **In response to this situation, the Government of Jordan has been leading the design and implementation of a plan aimed to unify international and national efforts to support refugees and host communities in Jordan.** Led by the Ministry of Planning and International Cooperation, the Jordan Response Platform for the Syria Crisis (**JRPSC**) constitutes the strategic partnership mechanism for the development of a comprehensive refugee, resilience-strengthening and development response to the impact of the Syria crisis on Jordan. The JRPSC has developed the Jordan Response Plan 2015 (**JRP 2015**), the first nationally-led response of its kind, joining refugee and development responses in one comprehensive national plan. Building on the achievements of the JRP 2015, the JRPSC recently developed and launched the current Jordan Response Plan 2016-2018 (**JRP 2016-2018**).

B. Sectoral and Institutional Context

5. **Competition for access to public services and scarce resources has fuelled tensions and social conflict, which can be considered as one of the key reasons for a marked increase in litigation.** The Ministry of Justice (MoJ) – who oversees the court system in Jordan- has reported caseload increases of

¹The World Bank. Data. <http://data.worldbank.org/country/jordan>

²The World Bank. Jordan Economic Monitor. <http://www.worldbank.org/en/country/jordan/publication/jordan-economic-monitor-home>

³The World Bank. Data. <http://data.worldbank.org/country/jordan>

⁴ See 2.

50% in Amman, 77% in Irbid, and 84% in Mafraq during the period 2011-2014 that challenge the technical and operational capacity of the judicial system. Shari'a courts, for example, recorded 7,000 marriage related cases for 2014, a significant increase from the 350 marriage related cases recorded for 2011.⁵ As a result of this significant increase in caseloads, the capacities of all courts, including but not limited to sharia and juvenile courts, have been affected.

6. Despite this increase in litigation, not everyone has guaranteed access to the court system. The Jordanian laws provide that all people have access to the courts but do not guarantee the right to defense or access to justice for all. In a court of law, those who cannot afford a lawyer will not be granted legal aid by the state except in criminal cases where the crime is punishable by execution or life imprisonment. This leaves the vast majority of poor and vulnerable people forced to represent themselves albeit their lack of knowledge of the laws and the complex court procedures. In addition, court procedures prevent individuals from pursuing their rights in certain civil and administrative matters without first obtaining legal representation.

7. Data strongly suggests the poor and near poor are considerably more likely to experience legal problems. In 2011, the Justice Center for Legal Aid (JCLA) and the Department of Statistics conducted a survey on 10,000 households, surveying citizen interaction with the justice sector – known as the “Demand for Legal Aid Services Survey”. Of those respondents reporting legal problems, 68% fell within the third and fourth expenditure quartiles that roughly represent the near-poor and poor, respectively. The near-poor, which likely contain a portion of the transient poor, were the most likely to report a legal problem. The poor and near-poor were considerably more likely to experience certain legal problems, namely those related to personal status (family) law, and represented a relatively high percentage of those affected by other legal problems, including those related to landlord-tenant relations, assault, child custody, inheritance and labor. Jordan’s Population and Family Health Survey demonstrates that poor women are more likely to be victims of domestic violence.

8. However, legal aid services targeted to the poor have traditionally been limited to serious criminal cases, with few services provided for civil and family cases, and the number of beneficiaries had remained quite small. The Demand for Legal Aid Services Study found that 20% of respondents or their family members had recently experienced legal problems. The poor and near-poor were the most likely to experience legal problems, but were the least likely to have access to services to resolve their problems. The survey also demonstrated that women face particular difficulty in accessing courts and lawyers. Refugees face even more obstacles, while at the same time straining existing service providers, and may be more likely to face certain legal problems, such as domestic violence.

9. The lack of access to justice for the poor and vulnerable in Jordan is underpinned by several realities. Jordan lacks an institutionalized, sustainable, legal aid framework through which the poor and vulnerable can access legal aid services when needed. Many poor and vulnerable Jordanians are unaware of their legal rights, or their ability to access non-government legal aid services. The laws and government institutions in Jordan are complex and form a significant barrier for poor and vulnerable people attempting to deal with their legal problems themselves. Refugees in particular face the barrier of being in a country with unfamiliar laws and a distrust of, and aversion to, approaching government institutions. This makes them vulnerable to abuse and exploitation (including human trafficking). If granted work permits, Jordan’s sponsorship system (“Kafalah”) binds migrant workers to their designated employer, often without adequate access to legal recourse when they face abuse.

10. The importance of access to justice for the poor and vulnerable, supported by legal aid services, lies in the dual impact it has on both poverty alleviation and inclusion. The poor and vulnerable often

⁵ Government of Jordan, *Jordan Response Plan for the Syria Crisis 2016 – 2018*, p 87. See <http://www.jrpsc.org/>.

lack access to services and mechanisms that safeguard and fulfill their economic, social and political rights. Services often prove inaccessible due to the costs involved, the inability to procure legal representation and the fact that services and rights may exist on paper but not in practice. As a result, the poor and vulnerable are trapped in a vicious cycle where barriers to obtaining justice reinforce their poverty and exclusion, and thus create a destabilizing factor in host countries. Proper legal information, assistance and representation constitute an effective means of providing such safeguards and protection.

11. The importance of access to justice has been recognized by the Government of Jordan in the JRP 2015 and JRP 2016-2018. In particular the Justice Sector Overall Objective of the JRP 2016-2018 aims to “ensure quality and prompt access to the justice system for all women, girls, boys, and men (WGBM) in Jordan in governorates affected by the Syria crisis”. The justice sector response plan aims at addressing critical short and medium term needs common to both Syrian refugees and Jordanians, and entails significant improvements to the institutional capacity of the judicial system.

12. The project will respond to this need to enhance access to justice in Jordan, building on two ongoing World Bank grants supporting legal aid services in the country. The JSDF grant “Enhancing Community-Driven Legal Aid Services to the Poor” and SPF grant “Delivering Legal Aid Services to Iraqi and Palestinian Refugees” have supported the JCLA in building a system of legal aid provision for the poorest and most vulnerable in Jordan. Since the projects started, JCLA has become a key actor in the provision of legal aid services in Jordan, not only expanding its reach and services, but also laying some of the building blocks for a future legal aid system in Jordan. It has established 24 legal aid clinics and provided more than 20,000 legal representation and counseling services and roughly 5,000 legal awareness sessions.

13. Lessons learned during the implementation of the projects have informed the design of the current project. Experience with the current grants have shown that while crucial advancements have been made, the institutional capacity of government agencies needs to be further strengthened. JCLA has been able to lay the building blocks of a Legal Aid Unit with the MoJ, participating in the drafting of the laws and other procedural documentation for its establishment. Also, it has signed partnerships with more than sixty external partners, which allow access to beneficiaries and communities, linking supply and demand for legal services effectively. These have proved to be effective ways to revamp legal aid services, but there is still need to create more solid partnerships and referral mechanisms with governmental institutions. This project will help address these gaps by building on existing collaboration between JCLA and the Family Protection Department of the Ministry of Interior, covering domestic violence cases, and the Ministry of Social Development (MoSD), covering both juvenile justice cases and cases involving violence against women and girls.

C. Higher Level Objectives to which the Project Contributes

14. The project will contribute to strengthening social cohesion in Jordan. Through the improvement of access to justice, in particular of poor Jordanians and refugees, the project will contribute to alleviate tensions within affected communities. Alleviating those tensions is fundamental in ensuring social cohesion. It will also aid in ensuring vulnerable populations are able to exercise rights and access services, and hold government accountable for non-delivery of services.

15. The proposed project also links with the MNA regional strategy by supporting the resilience of Jordan in hosting large numbers of refugees from Syria by strengthening delivery of public services to both poor Jordanians and vulnerable refugees in communities hosting large numbers of refugees. The development objective of this project is also consistent with addressing obstacles and taking

advantage of opportunities to achieve the twin goals as identified in the recently finalized Jordan Systematic Country Diagnostic (SCD).

16. This project will contribute to the following State and Peace Building Fund (SPF) results:

a) *Increased access to justice, including capacity building to civil society and government entities, enhancing accountability for the provision of public services, and promoting inclusion of poor and vulnerable persons in cooperation with formal and informal institutions:* Responding to the needs of vulnerable Jordanians and refugees by providing more effective means to resolve legal problems that exacerbate poverty/exclusion and increase tension between hosting communities and refugees;

b) *Increasing demand-side governance, including an active role for civil society and improved state-society relations:* Supporting measures to improve governance through service delivery improvements involving partnerships between government and civil society and enhancing institutional performance of governmental institutions;

c) *Improved capacity to deliver services to promote confidence building:* Increasing the knowledge base for successful interventions in resolution of legal problems for communities affected by hosting large numbers of refugees. Successful piloting of legal aid services will lay the foundation for improved service delivery and could be translated into more systematic reforms benefiting all of Jordan.

II. PROJECT DEVELOPMENT OBJECTIVES

A. PDO

17. The development objective is to increase access to legal aid services (information, counseling and legal representation) for poor Jordanians, particularly women, and refugees in host communities.

Project Beneficiaries

18. There will be approximately 30,000 direct beneficiaries (at least 60% women)

19. The project will operate on a national level, targeting refugee-impacted communities. In accordance with UNHCR data, the majority of Syrian refugees (80%) reside outside UNHCR camps in local Jordanian communities. Most Syrian refugees living outside the UNHCR camps reside in the areas and capital cities in the Central and Northern governorates of Jordan, particularly Amman, Irbid, Mafraq & Zarqa. While undertaking activities in all governorates, the project will specifically target beneficiaries in the refugee-impacted communities.

PDO Level Results Indicators

20. PDO Level Results will be measured through the following indicators:

- (i) Legal services are enhanced through increased counseling, representation and ADR services to target communities;
- (ii) Beneficiaries have increased awareness about legal rights and procedures for enforcing them; and

- (iii) Increased effectiveness of beneficiary referral mechanisms involving new partners. This will be measured through the administrative statistics collected by JCLA.

III. PROJECT DESCRIPTION

A. Project Components

21. The project will include the following components:

Component 1: Enhancing Legal Services to Communities Impacted by the Refugee Crisis

1.1. Expanding scope and reach of legal services through partnerships

22. **Under this component, JCLA will continue expanding its referral agreements and partnerships with governmental and civil society organizations.** At present JCLA's beneficiaries are referred by JCLA's 70 referral partners across 74 locations, through JCLA's awareness trainers following a beneficiary's attendance at a JCLA legal awareness session, by the judiciary, or from word-of-mouth within the community. By continuing and building on these referral pathways, JCLA will continue to receive increased numbers of poor and vulnerable people seeking legal assistance for their legal problems. In particular, the referral agreements with governmental agencies will allow the Government of Jordan to increase its effectiveness in dealing with issues involving refugee-impacted communities. For example, this component will seek to pilot a legal aid referral system with the MoSD⁶ on cases of juvenile justice and violence against women and girls, and co-locating legal aid offices managed by JCLA attached to units of the Family Protection Department (FPD) of the Ministry of Interior, covering cases of domestic violence.⁷

23. **This component will also support JCLA in increasing the scope of its legal services including alternative dispute resolution services.** In addition to expanding the provision of its legal consultation and court representation services in communities hosting refugees, through this component JCLA will enhance the scope of these existing legal aid services by providing poor and vulnerable people with access to out-of-court/alternative dispute resolution legal services (**ADR services**). The aim of this enhanced service is to reduce the need for poor and vulnerable people to undertake costly and lengthy court proceedings to resolve their legal problem and to encourage early resolution of legal problems that do not require the commencement of court proceedings. JCLA will establish and administer the ADR service through a dedicated unit within the organization. The ADR unit will be responsible for setting up a facility, contracting/recruiting staff, developing guidelines, and administering training for staff. The ADR services will be provided by a team of one legal consultant and one social worker, trained to use ADR techniques (which includes but is not limited to mediation) to achieve an amicable settlement between parties and that can, where appropriate, be registered in court. ADR will be offered to all beneficiaries in all types of cases, but with focus on cases on personal status, family law, labor law, and

⁶ A referral unit will be established to refer MoSD clients to legal aid (information, counseling and legal representation) providers, such as JCLA, to resolve legal problems related primarily to family law (alimony, child support, child custody), juveniles charged with crimes, domestic violence and access to National Aid Fund benefits.

⁷ The FPD was established under the Law on Domestic Violence, and are a one-stop shop for addressing domestic violence complaints through intake, investigation by the police, and access to medical and social services. To enhance their work, FPD would like to include the provision of legal aid services to the one-stop model that will allow poor women to initiate criminal complaints against their abuses, and obtain civil protection orders (restraining orders) guaranteeing them access to their homes and expedited access to alimony, child support and child custody.

juvenile law.

24. These enhanced services will reach beneficiaries across all of Jordan, with a particular focus on the host communities with higher number of refugees. Services will be provided primarily in the twenty-four JCLA clinics, most of them located within the premises of its hosting-partner organizations, which will enable JCLA to continue maximizing its outreach to poor and vulnerable people in Jordan and enhance the sustainability of clinic operations. Eighty percent of registered Syrian refugees live among host communities all over Jordan, especially in the Amman, Mafraq, Ma'an, Karak and Zarqa governorates. This is similar to the residential locations of Iraqi refugees, who reside primarily in the Eastern urban areas of the capital Amman, Zarqa, Irbid, and Madaba. JCLA will continue to provide legal aid services on poverty law issues relevant to the needs of refugees and vulnerable members of their host communities. Priority legal aid issues will continue to be regularly reviewed and assessed on a case-by-case basis to ensure resources are responsive to the legal needs of poor and vulnerable people in Jordan.

1.2. Developing partnerships with the legal community

25. Through this sub-component, JCLA will leverage its connections with lawyers and institutions within the legal community to expand the reach of its services. JCLA will harness the services of lawyers in the community who are willing to contribute to JCLA's work on a voluntary basis. The network will be developed through the following avenues: volunteer lawyers working under the direction of JCLA; partnerships with law firms, that will allocate time of their lawyers to perform *pro bono*; and partnerships with universities, which will allow students to perform limited *pro bono* activities (awareness and counseling) under the supervision of lawyers.

26. The added value of utilizing these services includes expanding the availability of legal services to poor and vulnerable people, and reducing cost levels for JCLA. JCLA will approach law firms and gauge lawyer's interest on an incremental basis, starting first in Amman and, if interest is apparent amongst the legal community, expanding nationally. JCLA will aim to utilize the voluntary services of lawyers by requesting their regular presence to provide legal aid services at one of JCLA's legal clinics (e.g. once a week or once a fortnight). Lawyers will also be asked to volunteer their time at JCLA legal awareness sessions, first by conducting the awareness sessions and then, where possible, to provide legal consultations to a set number of awareness attendees following the awareness session.

Component 2: Increasing Legal Advocacy and Awareness

27. Under this component, the project will strengthen public awareness of rights and legal aid services through collaborative awareness sessions and public information campaigns. When equipped with information about the law and pathways to justice (including accessing legal aid), poor and vulnerable people are legally empowered to solve their legal problem, in turn increasing their ability to access their social and economic rights. The relevance of these awareness sessions was further evident following the Legal Aid Awareness Survey, in which it was found that only 1.5% of those surveyed were aware of the concept of legal aid. Since its inception, JCLA has been providing legal awareness and legal education activities to poor and vulnerable people in Jordan. Through this project, these activities will be expanded and strengthened with two sub-components.

2.1. Strengthening the approach to its advocacy activities in Jordan

28. Through this sub-component, JCLA will enhance its legal advocacy strategy. One of the key elements to building a functioning legal aid system is to increase awareness and engagement on the topic

of legal aid among potential beneficiaries, but also among the government and the general public. In order to achieve this, JCLA will (a) develop and diversify its public narrative on the concept of legal aid and (b) increase its outreach tools, better crafting the delivery mechanisms to each audience.

(a) JCLA will more effectively engage with the public and government on the issue of institutionalizing legal aid in Jordan. JCLA will do this through training JCLA staff to more effectively capture the stories of beneficiaries, JCLA legal consultants, legal community members (such as the judiciary and other lawyers), and members of the public. JCLA will also aim to revamp its advocacy efforts to enhance the provision of sustainable and institutionalized legal aid services to the poor and vulnerable by further developing its advocacy strategy.

(b) JCLA will then implement this strategy with government entities and the community to achieve positive outcomes, including through conducting workshops, conferences and meetings with relevant legal aid sector stakeholders, and producing and publishing assessments and analysis on legal aid topics. JCLA will utilize the trainings and materials developed under the previous paragraph in these sessions. Alternative media will also be invested to establish and enhance platforms (such as social media and JCLA's website) in which to engage the public on information relating to legal issues and access to legal aid. Innovative public engagement tools will be utilized, to help enhance community awareness and engagement on the concept of legal aid, including through utilizing community organizing and citizen engagement models. The aim of this latter activity will be to engage citizens on the issue of legal aid and motivation to not only discuss it amongst their peers and potential beneficiaries, but to be driven to assist JCLA in its overall mission to institutionalize legal aid in Jordan.

29. This sub-component will also involve JCLA conducting research and desk reviews on legal aid and legal issues to enable the organization to more effectively engage with stakeholders. JCLA has previously conducted groundbreaking quantitative and qualitative studies aimed at clarifying the demand for legal aid services in Jordan and to obtain a greater understanding of the circumstances in which people engage with the justice system in Jordan. The JRPSC 2016 – 2018, in addition to referring to this research, also noted the need to continue research, data analysis and assessment to identify the gaps in the justice sector and reflect the impact of the Syria crisis on the justice sector. JCLA will continue to review and research on legal aid and related topics with the ongoing goal of informing and enhancing stakeholder discussions.

2.2. Expanding and strengthening legal awareness activities

30. This sub-component will allow JCLA to increase the number of partnerships with CSOs, government entities and international organizations to expand the reach of its legal awareness activities. JCLA will work closely with its 70 referral partners to reach high amounts of beneficiaries through its legal awareness sessions, and tailor the content these sessions to the needs of each audience. JCLA will aim to increase its number of legal awareness partnerships with a view to enhancing the sustainability of its operations (through partners hosting the awareness sessions) and increase its outreach (through partners referring beneficiaries to awareness sessions). JCLA will also continue to provide sessions on legal education topics (particularly on children's rights issues such as sexual harassment and bullying) in United Nations Relief and Works Agency (UNRWA) schools throughout Jordan. Under the previous SPF project, JCLA conducted hundreds of awareness sessions in these schools, reaching thousands of Palestinian refugee children. JCLA will aim to expand its outreach to refugee children both in and outside of refugee camps, and vulnerable children in their host communities, through a targeted child's rights campaign.

31. JCLA will also strengthen the contents of its legal awareness materials, adapting materials to different audiences and potential beneficiary groups. In particular, through this sub-component, JCLA will draft and formalize the content for all of its awareness session topics, to ensure consistency in quality and content amongst the trainers delivering the sessions. JCLA trainers will also be required to undertake training on this new content. Trainer guidelines will also be developed. Further, JCLA will produce brochures on the topic of legal aid, flyers informing the public on upcoming awareness sessions, and information sheets on various legal issues, to be distributed to JCLA's partners and beneficiaries. JCLA will also enhance its website in both Arabic and English to ensure legal aid information is readily available to the public, particularly vulnerable beneficiaries and partners seeking to make a referral to JCLA.

Component 3: Capacity Building

32. This component will support capacity building activities, both within JCLA and in government agencies. The experience with the current JSDF and SPF projects has demonstrated the capital importance of strengthening the capacities of JCLA and other partners to ensure that the demand for legal aid services is met with the required quality. JCLA has strengthened its internal processes by developing an automated online case management system, quality control mechanisms (including a three-monthly random audit of the active cases of each lawyer), a continued legal education program, and internal policies and procedures covering development of a legal aid procedural manual, a code of ethics and a mechanism for addressing internal complaints. Yet, an increased demand requires an additional investment in capacity building, to ensure the sustainability of established legal aid services. For this reason, and based on the lessons learned during the previous projects, through these two sub-components, the project aims at setting up the essential capacities both within JCLA, but also in governmental institutions dealing with beneficiaries.

3.1. Capacity Building within JCLA

33. The four activities under this sub-component seek to up-scale or enhance the processes and practices already developed, to bring JCLA's legal aid model further in line with international best practice:

1. *Enhanced intake and eligibility assessment processes:* At present, JCLA legal consultants undertake the intake process in its entirety, from completing the initial intake form with the beneficiary, providing the initial legal consultation, to undertaking and documenting his or her assessment of the beneficiary's eligibility for court representation (a means and merit test) and if eligible, providing that beneficiary with court representation. JCLA will continue to conduct an eligibility assessment for beneficiaries seeking court representation, but will assign the role of conducting the eligibility assessment to independent assessors located in JCLA's head office. This will have the dual effect of maximizing a legal consultant's time to provide legal services, and also ensuring an enhanced and central eligibility assessment process.
2. *Improved case management system:* JCLA will review whether the data collected is sufficient to allow comprehensive reporting on the impact of JCLA's services, and strengthen data collection and reporting accordingly. JCLA will also increase the number of automatically rendered reports. These reports will assist JCLA management in assessing operational performance, track progress against organizational and individual team member targets, and prepare reports to donors. In addition, JCLA will strengthen team capacity to perform data analysis for advocacy and awareness purposes.
3. *Development of ICT for improving information-sharing and long-term knowledge management:*

The IT solutions should be accessible to all JCLA team members, including those working in remote locations, with security features that guarantee the safekeeping of confidential client information. It should collect all documented JCLA resources in an organized manner, with a multi-tiered permission system providing access to those documents relevant to the team member's duties and responsibilities. It should also allow communication between JCLA team members on a secure platform.

4. *Expansion of continuing legal education for JCLA staff:* JCLA will expand its Continued Legal Education program to include training on how to manage complex and vulnerable beneficiaries. To deliver these training sessions, JCLA seeks to leverage the combined knowledge and expertise of its team members, its network of partners, and where required, external experts. JCLA will also enhance the continued legal education of its legal consultants to ensure coverage of all issues relevant to poor and vulnerable people in Jordan, particularly Syrian refugees (for example labour law and human trafficking).

3.2. Capacity Building of Government Partners

34. Through this sub-component, JCLA will build on its established relationships with key government partners to further strengthen their capacity to enhance protection of refugees, poor and vulnerable people in Jordan. JCLA interventions will be based on the needs of the government partners, which will be assessed at the project start and reviewed throughout the life of the project. While other or different government partners may emerge during the life of the project, at this stage the following government partners have identified several needs relevant to the overall objectives of the project: :

1. *Capacity-building to MoSD:* Following revisions to the Juvenile Law in 2014, the MoSD have been accorded new responsibilities regarding the management of juveniles. The MoSD have identified the need for staff to receive training on the effective management of a legal aid system in their juvenile detention centers. JCLA will aim to work with MoSD to enhance staff capacity in this area. This will involve identification of juveniles in need of legal assistance, referral to a JCLA lawyer, and identification of resources for families of juveniles.
2. *Capacity-building to FPD:* Following consultations with the FPD, JCLA and the FPD identified the need for their officers to receive training on the legal issues around domestic violence, development of awareness materials for victims of domestic violence, and the need for the establishment of legal aid desks at FPD centers providing in-take for victims of domestic violence.
3. *Capacity-building to MoJ:* JCLA will provide capacity-building assistance to MoJ to establish its Legal Aid Unit, which will include automation of the Unit's cases management system, establishing eligibility criteria for legal aid services, and developing an effective referral mechanism for provision of legal aid services.

35. JCLA's assistance to government partners will also allow the Government of Jordan to pilot new referral pathways and enhance existing ones, while JCLA continues to assist the MoJ with developing the capacity of the Legal Aid Department to coordinate these referrals centrally. These activities complement the efforts by the Government of Jordan, in particular the MoJ, to establish a public-private partnership with civil society organizations and the Jordan Bar Association around the delivery of legal aid to all vulnerable people in Jordan.

Component 4: Project Management and Monitoring & Evaluation

36. **This component will finance incremental costs of JCLA for grant management.** This component will cover coordination and supervision of implementation activities, financial management, annual grant audit, and monitoring and evaluation. The Executive Director of JCLA, based in the JCLA Headquarters in Amman, will provide overall management and oversight of the project, and will take the lead on: developing the detailed implementation plan and timeframe; establishing a monitoring and evaluation plan; and conducting periodic performance appraisals and reviews. JCLA will ensure a full-time financial management officer and full-time procurement officer are on staff, to conduct all procurement, disbursement and financial reporting responsibilities, as previously recommended in by the FM and Procurement Assessments of JCLA.

37. **A monitoring and evaluation process will be put into effect.** Monitoring of the program will be the responsibility of the Director of JCLA and the JCLA Senior Attorney. The Director of JCLA will be responsible for monitoring all aspects of the program. The JCLA Senior Attorney will be responsible for monitoring cases of legal representation through random, regular checks of individual cases in the automated case management system. Evaluation guidelines will be developed by the Director of JCLA, in consultation with key stakeholders (poor communities, civil society organizations and Ministry of Justice), prior to the first Interim Evaluation. Evaluation reports will be issued along the following timeline:

- Interim Evaluation – 1st year
- Full Evaluation (as part of Mid-Term Review) – 18 months
- Interim Evaluation – 2nd year
- Implementation Completion Report – 3rd year

B. Project Financing

Instrument

38. This project will be funded by a Recipient-Executed Trust Fund (RETF), supported by a grant from the State and Peace-Building Fund.

Project Cost and Financing

39. The total project cost of the project is \$2,500,000 over 36 months of project implementation, to be funded by a grant from the SPF.

Project Components	Project cost	Grant Financing	% Financing
1. Enhancing Legal Services to Communities Impacted by the Refugee Crisis	1,225,157	1,225,157	49%
2. Increasing Legal Advocacy and Awareness	569,082	569,082	23%
3.Capacity Building	469,131	469,131	19%
4.Project Management and Monitoring and Evaluation	236,630	236,630	9%
Total Baseline Costs			
Physical contingencies			
Price contingencies			

Total Project Costs	\$2,500,000	\$2,500,000	100%
Interest During Implementation			
Front-End Fees			
Total Financing Required			

C. Lessons Learned and Reflected in the Project Design

40. Since 2011, the Bank has been working with JCLA in expanding and strengthening legal services in Jordan through a JSDF and a SPF grant. JSDF grant “Enhancing Community-Driven Legal Aid Services to the Poor” and SPF grant “Delivering Legal Aid Services to Iraqi and Palestinian Refugees” have supported JCLA in building a system of legal aid provision in Jordan. Since projects started, JCLA has become a key actor in the provision of legal aid services in Jordan, not only expanding its reach and services, but also laying some of the building blocks of a future legal aid system in Jordan.

41. Lessons learned in the course of these projects and incorporated in the project design include:

- a. Partnering with civil society and governmental organizations is the an effective way of expanding the provision of legal aid services. Both the co-location of legal aid clinics and the referral agreements provide JCLA with access to communities and beneficiaries, but also to a deep understanding of local dynamics that allow it to provide well designed services. Such agreements are also very useful to civil society and governmental institutions, since often they do not have the capacity to provide the legal services or counseling that their beneficiaries or citizens require. Under this project, JCLA will continue to expand its partnerships, with a particular focus in establishing partnerships with the government agencies that deal with refugees and poor Jordanians from host communities.
- b. There is a need in Jordan to promote broader awareness about legal aid as well as a pro-bono culture among the legal community. The ongoing projects envisioned the establishment of a pro-bono lawyer’s network, yet, the take up of cases by registered lawyers has been lower than expected. In order to combat these obstacles, the current project will focus in designing a more comprehensive legal awareness strategy, with a focus on establishing partnerships with universities and law firms and on using new media and IT tools to target key audiences.
- c. Refugee camps are not necessarily the areas with greater need for legal services. Due to the influx of external aid, refugee camps tend to be overcrowded with foreign donors and actors. On the contrary, other areas with large numbers of refugees and vulnerable Jordanians tend to be underserved, experiencing the greatest risk for scarcity and tensions. The project will thus not focus solely on refugee camps, but will try to cover those areas and communities that are experiencing greatest unmet demand.
- d. JCLA staff has realized that, while having the greatest impact for beneficiaries, the provision of legal representation in court is not always the most efficient, or the most effective way of addressing beneficiaries’ needs. In certain cases, JCLA lawyers can more effectively help their clients by helping the parties to resolve their disputes out-of-court. In order to do so, under the current project JCLA will start offering alternative dispute resolution services, training its lawyers in those tasks and creating the manuals and procedures to be able to provide such services.
- e. Under the current projects, JCLA focused on expanding its coverage and working on several fronts to increase beneficiaries’ awareness about legal aid. It also worked hard, participating in the drafting of laws and the establishment of the legal aid unit within the MoJ. After these

years, JCLA management has realized the importance of revamping its capacities and systems, in order to continue providing services sustainably, but also in producing the information needed to influence policy debate around legal aid in Jordan. Therefore, this project will dedicate substantial resources to strengthening those capacities within JCLA and with key partners.

- f. To address the political economy of developing new legal services, this project will focus in creating strong links with government entities, developing a solid public awareness strategy and working with key partners in the university to promote a pro-bono culture among the legal community.

IV. IMPLEMENTATION

A. Institutional and Implementation Arrangements

42. **The implementing agency will be the Justice Center for Legal Aid (JCLA).** JCLA was established in July 2008 as a nonprofit, nongovernmental entity to provide legal aid services to the underprivileged residing in Jordan. Its mission is to provide legal empowerment of the poor and underprivileged communities in Jordan through legal counseling, representation and awareness building related to civil, criminal and family law cases, as well as specialized issues relating to employment and refugee status. JCLA provides legal aid to low-income and underprivileged persons for a variety of legal problems, including criminal matters, civil matters, family disputes, immigration and refugee related issues. It also works to enhance legal awareness among its beneficiaries related to their legal rights and duties. It is fully independent of the World Bank.

43. **Since its establishment in 2008, JCLA has become a key actor in the legal aid landscape in Jordan.** JCLA has established 24 legal aid clinics across Jordan and provided more than 20,000 legal representation and counseling services and about 5,000 legal awareness sessions since 2011. It has also been deeply involved in legal reforms related to access to justice, and other legal topics such as domestic violence or juvenile justice in Jordan. It is recognized nationally and internationally as a central player, and will be pivotal in developing the legal aid system in the country, as it has already been participating in the creation of a legal aid law, national strategy and legal aid unit within the MoJ.

44. **JCLA has ably implemented three grants, one of them funded by the SPF, totaling about 4.5 million dollars.** These grants, which will close in 2015, have been disbursed almost in full to date (months before closing). During the life of the projects, JCLA has built a strong team and has developed a sound experience with Bank internal processes and guidelines, including procurement and financial management specialists.

B. Results Monitoring and Evaluation

45. Monitoring and evaluating project results will employ both qualitative and quantitative methods to gauge project-induced changes. There is already a baseline for the number of cases and services provided annually that will permit tracking the increase in the delivery of services. Baselines for the other indicators will be undertaken before activities commence and close tracking will occur throughout the life of the project.

46. Evaluation of the program will be the overall responsibility of the executive director and the M&E specialist of JCLA. Evaluation will be based on the following sources of data and information:

- JCLA administrative data and information from the case management system
- JCLA Senior Attorney review and assessment of legal representation cases through the automated case management system
- Legal aid client feedback (awareness, counseling and representation activities)
- JCLA Quarterly Reports
- Mid-Term Review (at 18 months)
- Regular supervision missions conducted by TTLs
- Measuring implementation of key results

C. Sustainability

47. **At the core of exit strategy for SPF-funded activities is JCLA' focus on institutionalizing a legal aid system integrated by the government through partnerships.** Current projects have provided important insights on the viability of different sustainability measures. For example, the strategy of building partnerships with other organizations has proved particularly successful, but there is a clear need to expand and deepen it with governmental institutions. This will be a major focus under this project.

48. **JCLA will continue its work to establish the legal and institutional framework for a national legal aid system.** The establishment of such framework has been a core part of JCLA's activities under the current projects, but the task remains unfinished. Creating the enabling environment for a nationwide legal aid system to flourish will still take time, but the boost derived from this project and the experience already accumulated by JCLA will be essential in solidifying the basis (legal aid law, MoJ legal aid unit, etc.) already established in Jordan.

49. **Promoting a collaborative culture will be at the core of the strategy for the sustainability of the activities.** Initially, the idea with the previous projects was to establish a pro-bono lawyers' network, but its creation and smooth functioning proved more difficult than expected. The reasons for the slow take up of cases by lawyers were mainly the lack of a pro-bono culture in Jordan as well as a resistance from some sectors of the legal community. Yet, JCLA has been able to bring aboard several lawyers to work voluntarily for them, for example young lawyers or recent graduates. This has evidenced the potential to leverage the work of lawyers in providing legal aid services across Jordan if the right groups are targeted and the necessary collaborative culture is developed. JCLA will work on these areas through this project, working with law schools and law firms that will become the key allies in expanding the pro-bono legal aid work in the country.

V. KEY RISKS AND MITIGATION MEASURES

A. Risk Ratings Summary Table

	Risk Rating	Mitigation measures
Stakeholder Risk		
	Medium	JCLA has already started cooperating with the Bar Association and other key players in several fronts, making sure that there are no conflicts or overlapping areas of work. In addition, lessons learned from previous projects have been taken into account during project design, and activities have been chosen and delineated to make sure that any potential conflict is avoided.
Implementing Agency Risk		
- Capacity	Low	JCLA has a very strong reputation in Jordan, and significant experience implementing JSDF and SPF grants. JCLA has a very competent management team and has built in the necessary fiduciary requirements by hiring procurement and financial management specialists and training them on World Bank procedures.
- Governance	Low	JCLA has strong governance mechanisms in place and strong experience running programs in Jordan.
Project Risk		
- Design	Medium	The World Bank and JCLA have had previous experience in the design of a SPF and a JSDF-funded project, with similar activities and components of this project. Maintaining buy in from government agencies will be key to ensure sustainability of the project.
- Social and Environmental	Low	There is limited risk that certain groups, particularly poor Jordanians, can feel aggrieved if services are only focused on refugees. The project design has taken this into account, focusing on servicing communities hosting refugees instead of refugees only.
- Program and Donor	N/A	None expected

- Delivery Monitoring and Sustainability	Medium	Following a baseline assessment, the case management system will collect information on the services and their results. There is a need for JCLA management to focus on collecting the data and creating the systems that will allow it to track implementation progress and collect the information that will provide empirical information to strengthen its advocacy efforts.
Overall Implementation Risk	Low	

B. Overall Risk Rating Explanation

50. The overall risk rating is low. The capacity of the implementing agency is very high with a demonstrated record in the operating environment. While the implementing agency is capable of managing the expected risks, certain political economy risks, particularly related to resistance by vested interests and opposition of certain groups within and outside the government, may jeopardize some of the activities and affect sustainability.

VI. APPRAISAL SUMMARY

Main Economic Benefits

51. **The Project's expected contribution to the country's socioeconomic development:** The proposed project will directly contribute to the empowerment of the most poor and vulnerable groups in Jordan. The current projects have evidenced the impact that winning alimony or child support cases can have in any given woman's income sources. Also, solving legal disputes over their legal status can have huge implications for refugees in terms of their access to government services and their ability to engage in economic transactions. JCLA is currently conducting a study to measure the impact of legal aid on the economic situation of beneficiaries.

52. **Value added of the Bank's support:** Although other donors and NGOs have in past years supported various legal aid initiatives in Jordan, the World Bank has developed a substantial expertise in supporting this agenda in Jordan and other countries. Also, the World Bank and JCLA have been deeply involved in the setting up of a legal aid system in Jordan, with a level of on the ground knowledge and network of partners that highly increases the potential impact of this project. The work already done and that will be continued through this project is expected to sustain and expand the achievements realized under previous initiatives, giving the needed boost to legal aid in the country.

Procurement

53. **General.** All goods, non-consulting services and consultants' services required for the project and to be financed out of the proceeds of the Grant shall be procured in according with the requirements set forth or referred to in:

- (i) Section I of the "Guidelines: Procurement of Goods, Works and Non-consulting services under IBRD Loans and IDA Credits and Grants by World Bank Borrowers" dated January 2011

(revised July 2014) (“Procurement Guidelines”), in the case of goods and non-consulting services;

(ii) Sections I and IV of the “Guidelines: Selection and Employment of consultants under IBRD Loans and IDA Credits and Grants by World Bank Borrowers” dated January 2011 (revised July 2014) (“Consultant Guidelines”) in the case of consultants’ services; and

(iii) The provisions of this Section, as the same shall be elaborated in the procurement plan prepared and updated from time to time by the Recipient for the Project in accordance with paragraph 1.18 of the procurement Guidelines and paragraph 1.25 of the consultant Guidelines (“Procurement Plan”).

53. **Definitions.** The capitalized terms used in the following paragraphs of this section to describe particular procurement methods or methods of review by the World Bank of particular contracts, refer to the corresponding method described in Sections II and III of the procurement Guidelines, or sections II, III, IV and V of the Consultant Guidelines, as the case may be.

54. **Particular Methods of Procurement of Goods and Non-Consulting Services.** Goods and non-consulting services shall be procured under contracts awarded on the basis of: (A) Shopping; and (B) Direct Contracting.

55. **Particular Methods of Procurement of Consultants’ Services**

(i) Except as otherwise provided in item (ii) below, consultants’ services shall be procured under contracts awarded on the basis of Quality- and Cost-based Selection.

(ii) The following methods, other than Quality- and Cost-based Selection, may be used for the procurement of consultants’ services for those assignments which are specified in the Procurement Plan: (A) Quality-based Selection; (B) Selection under a Fixed Budget; (C) Least Cost Selection; (D) Selection based on Consultants’ Qualifications; (E) Single source selection of consulting firms; (F) Selection of Individual Consultants, all individual consultants consulting assignments would be selected on the basis of comparison of CVs in accordance with Section V of the Guidelines for Selection of Consultants, and (G) Single source procedures for the Selection of Individual Consultants.

56. **Review by the World Bank of Procurement Decisions.** The Procurement Plan shall set forth those contracts which shall be subject to the World Bank’s Prior Review. All other contracts shall be subject to Post Review by the World Bank.

Financial Management/Disbursement

54. **The envisaged project is proposed to be implemented by JCLA, being the grant recipient.** Therefore, JCLA is requested to maintain, among other things, an appropriate and adequate financial management system, including records, accounts and financial statements, which adequately reflect the operations, resources and expenditures of the Project.

55. **JCLA is implementing the ongoing “Enhancing Community Driven Legal Aid Services to the Poor” and “Delivering Legal Aid Services to Displaced Iraqis and Palestinians, and Poor Jordanians” Projects and its FM performance has been assessed as Satisfactory.** The FM assessment conducted for the ongoing two projects was updated for this envisaged project. Project will largely follow the same FM and disbursement arrangements of the ongoing projects, which include: 1) JCLA own FM team will manage the FM and disbursement functions; 2) a US Dollar designated account will be used,

3) relying on JCLA accounting system and quarterly financial reporting, 4) JCLA internal control procedures will be used complemented by the Bank’s FM guidelines and updated in the FM manual; and 5) grant annual financial statements will be audited by an acceptable audit firm. Taking into account the risk mitigation measures proposed, the overall financial management risk for this Grant is assessed as “Moderate”, both before and after mitigation. The following are the identified FM risks and the relevant mitigating measures. With these mitigating measures in place, the Project would have acceptable Project FM arrangements and a Moderate level of Risk.

56. The FM risk continues to be assessed moderate, mainly due to: i) large number of transactions of small amounts, ii) JCLA manages and accounts for several funds in addition to the Project posing risks of misallocations to operating costs; and iii) petty cash advances will be provided to Lawyers to finance case fees, fuel and other court administrative costs, which might increase the possibility of committing fraud. Mitigating measures for the above mentioned risks that are in place and implemented by JCLA, include: i) the disbursement function is centered at HQ Office and managed by a qualified FM team. All disbursements will be subject to presentation of full documentation to the World Bank; ii) Financial reports will continue to be generated using JCLA accounting software and spreadsheets, enabling periodic follow ups and reconciliations; and iii) petty cash advances will be provided from JCLA own budget and expenses against those advances will be reimbursed from the DA subject to submission of signed advance payment reconciliation and fuel forms with full supporting documentation reviewed and approved by Finance Manager.

57. JCLA has solid experience and understanding of the World Bank FM and Disbursement guidelines gained through implementing the two aforementioned ongoing projects. JCLA FM team consisting of a Finance Manager and two accountants will carry out the FM and disbursement activities and will be partially financed by the Grant. Further technical support and training will be provided by the Bank to the Project FM team.

58. The Project will use a U.S Dollar Designated Account (DA) to hold grant proceeds to finance Consultancy Services, Goods and Training activities (All Categories). The Project DA will be opened at a commercial bank acceptable to the Bank. Authorized signatories, names and corresponding specimens of their signatures would be submitted to the Bank prior to the receipt of the first Withdrawal Application. Deposits into and payments from the DA will be made in accordance with the disbursement letter and Bank Disbursement Guidelines. Transaction based disbursement will continue to be used under this project. Accordingly, requests for payments from the Grant will continue to be initiated by JCLA through the use of withdrawal applications (WAs) either for advances, Direct Payments, Reimbursements, or Replenishments to the Designated Account. Submission of WAs with appropriate supporting documentation including detailed SOEs for reimbursements and replenishments to the DA will be the responsibility of JCLA. See Financial Management Actions needed upon project effectiveness.

Action		Due Date
1.	Prepare and submit authorized signatories to the World Bank.	Submission upon Project effectiveness.
2.	JCLA opens Designated Account for Project.	To be opened upon Project effectiveness.
3.	Issue the first set of Quarterly interim un-audited financial reports.	45 days after the first quarter end during which the first disbursement did take place.

4.	Engage external auditor	No later than six months after the submission of the first withdrawal application.
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59. **The Project will follow the cash basis of accounting where resources and uses of funds are recorded when cash is received or when payments are made, with maintaining records of commitments and reporting on unpaid amounts.** The accounting software maintained by JCLA captures the financial data and is used to record all transactions, however, this system has limitations only with respect to generating the required quarterly Interim Un-audited Financial Reports (IFRs) as per World Bank guidelines. Therefore, spreadsheet applications will be used to generate the financial reports. The format of IFRs has been provided to JCLA and will follow the same prepared IFRs of the two projects still handled by JCLA. The project will be responsible for submitting the quarterly IFRs within 45 days after the first quarter end during which the first disbursement takes place.

60. **The FM Manual will need to be updated to include particulars of this project.** The FM Manual that was developed by JCLA for the ongoing operations defines job description and responsibilities of the Finance team, levels of responsibilities, segregation of duties, the Projects' FM operations, including the flow of funds and documentations, ensure an orderly and efficient procurement and payment process, and properly record and safeguard project related assets and resources. The FM Manual will need to be updated to include particulars of this project. Based on this review, the design of the current internal control process and their functions are acceptable.

61. **In order to achieve one of the main objectives of the Project, which is expanding the legal aid to the needy refugees in Amman and other Governorates; JCLA lawyers will continue to be provided with petty cash advances,** not exceeding JD 500 (US\$706), from JCLA own budget to finance various costs including court case fees and transportation expenses. Those advances should be settled within 30 days from date of receipt. An analysis will be performed on those advances periodically, ensuring that all allowances were within the ceiling of JD 500 and cleared frequently.

62. **An external independent auditor acceptable to the Bank and financed by the Grant will be engaged to carry out the Project audit in accordance with the International Standards of Auditing, issue an independent report comprising the auditor's opinion, and prepare the management letter.** The audit report and management letter will be submitted to the Bank not later than six months after the end of each fiscal year. JCLA will be responsible for preparing the TORs for the auditor and submitting them to the Bank for clearance. The auditor will be requested also to provide an opinion on the Project's effectiveness of internal control system. Under the new World Bank Policy on access to Information issued on July 1, 2010, the audit report with audited financial statements of the Project will be made available to the Public.

Environment and Safeguard Policies

Environmental Safeguards

63. **The project will not directly finance any investments that would lead to environmental safeguard risks as per OP/BP 4.01, OP/BP 4.04, OP/BP 4.36, OP/BP 4.09 and OP/BP 4.37.**

Social (including Safeguards)

64. The project does not trigger OP/BP 4.11, OP/BP 4.10 and OP/BP 4.12.

65. Gender and youth. The project pays particular attention to women and youth in design and monitoring. Roughly 70% of JCLA beneficiaries of legal aid are women. Specifically, under Component 1, the government institutions that will be approached for partnerships deal mostly with women beneficiaries. Under Component 2, the trainings and legal awareness campaigns will specifically target women and children needs. Also, an important part of JCLA work is related to juvenile justice and children's rights.

Annex 1: Results Framework and Monitoring
Hashemite Kingdom of Jordan: Enhancing Delivery of Judicial Services to Poor Jordanians and Refugees in Host Communities (P157861)

Project Development Objective (PDO): The development objective is to increase access to justice sector services for poor Jordanians, particularly women, and refugees in host communities through innovative service delivery reforms.

PDO Level Results Indicators*	Core	Unit of Measure	Baseline	Cumulative Target Values**			Frequency	Data Source/ Methodology	Responsibility for Data Collection	Description (indicator definition etc.)
				YR 1	YR 2	YR3				
Indicator One: Legal services are enhanced through increased counseling, representation and ADR services to target communities		#	2,474 (2015)	600	3,000	3,000	Once per end of each project year	Baseline study, administrative data	JCLA	Number of legal counseling and representation services provided
Indicator Two: Beneficiaries have increased awareness about legal rights and procedures for enforcing them	<input type="checkbox"/>	# and %	TBD based on baseline study	70%	75%	80%	Once per end of each project year	Sample of “before” and “after” surveys conducted during awareness sessions	JCLA	Number of beneficiaries that report an increased knowledge following awareness sessions
Indicator Three: Increased effectiveness of beneficiary referral mechanisms involving new partners	<input type="checkbox"/>	# and %	0 0	7 5% increase in referrals	7 10% increase in referrals	6 20% increase in referrals	End of project End of project	Administrative data Administrative data	JCLA	At least 20 trainings delivered to GoJ partners making referrals and 20 percent increase in the number of cases referred by GoJ partners
Intermediate Indicator										
Enhanced systems and policies within JCLA		#	0	4	8	10	One per end of each project year	Administrative data	JCLA	Approved policies and implementation of internal management IT solutions

*Please indicate whether the indicator is a Core Sector Indicator (see further <http://coreindicators>)

**Target values should be entered for the years data will be available, not necessarily annually

Annex 2: Operational Risk Assessment Framework (ORAF) for Small RETFS

1. Project Stakeholder Risks	Rating	Medium
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<p>Description: The experience during the previous projects has shown certain resistance from stakeholders. In particular, the Bar Association in Jordan has sometimes interpreted JCLA’s work as a threat. Although this has not impacted negatively the overall satisfactory implementation of the projects, it can pose some difficulties in some activities. This was the case, for example, with the setting up of the pro-bono lawyers’ network in the current projects.</p>	<p>Risk Management: the experience with the current projects has allowed the team and JCLA to deeply understand the political economy dynamics that may impact the project. On the one hand, JCLA has already started cooperating with the Bar Association in several fronts, making sure that there are no turf battles among them. In addition, lessons learned have been taken into account during project design, and activities have been chosen and delineated to make sure that any potential conflict is avoided.</p>		
	<p>Resp: Bank and implementer</p>	<p>Due Date: Ongoing</p>	<p>Status:</p>
<p>2. Implementing Agency Risks (including fiduciary)</p>			
<p>Capacity</p>	<p>Rating:</p>	<p>Low</p>	
<p>Description: Project success is very dependent on the professional project performance of JCLA.</p>	<p>Risk Management: Implementing partner JCLA has a very strong reputation, and significant experience implementing SPF and other donor projects in Jordan. Since 2011 the World Bank in collaboration with JCLA has been piloting an approach to legal aid services delivery in the country. This project will benefit from lessons learned in this collaboration.</p>		
	<p>Resp: Bank and implementer</p>	<p>Due Date: Ongoing</p>	<p>Status:</p>
<p>Governance (including Fraud & Corruption)</p>	<p>Rating:</p>	<p>Low</p>	
<p>Description: Currently the organizational structure of JCLA is adequate and responsibilities are clearly defined at all levels.</p> <p>JCLA has no history of any incident of fraud and corruption and no such issues have been raised.</p>	<p>Risk Management: JCLA has an excellent track-record and there have been no issues of mis-procurement or financial mismanagement. Compliance of JCLA with agreed management procedures will be checked through regular supervision and remedial action will be taken if necessary. There is regular follow-up and dialogue between JCLA and WB staff on fiduciary management.</p> <p>The Bank team’s FM and procurement specialists are based in Amman, and with regular contact with JCLA and their team. This close presence and regular periodic supervision, annual audits and procurement and FM reviews will ensure JCLA’s compliance with business practices in accordance with international standards.</p>		
	<p>Resp: Bank and implementer</p>	<p>Due Date: Ongoing</p>	<p>Status:</p>
<p>3. Project Risks</p>			
<p>Design</p>	<p>Rating:</p>	<p>Medium</p>	
<p>Description: The project is a so called “soft” investment, which may be more difficult to monitor and assess compared to traditional Bank “hard” investments such as construction or service delivery.</p>	<p>Risk Management: The WDR 2011 highlighted that citizen perceptions of governance, rule of law, corruption, equality and respect for human rights can be strongly linked with violence and conflict, highlighting the importance of projects such as this that enable access to justice and accountability in FCS settings. A robust M&E component is planned for this project, which will allow project design to be adapted in accordance with implementation results. Beneficiaries will be monitored regularly, ensuring</p>		

	feedback loops, to allow for program refinement during the intervention component.		
	Resp: Bank and implementer	Due Date: Ongoing	Status:
Social & Environmental	Rating:	Low	
Description: Due to the nature of the activities and components, the project will not have foreseeable social or environmental negative impact.	Risk Management: The Bank team will supervise the project closely to make sure that this assessment regarding social and environmental risks continues to hold true.		
	Resp: Bank and implementer	Due Date: Ongoing	Status:

Delivery Monitoring	Rating:	Medium	
Description: Difficulties in assessing project success due to limited monitoring and evaluation tools on outcomes derived from a stronger focus on the part of JCLA management in implementing the project and expanding activities, rather than establishing the monitoring mechanisms and tools.	Risk Management: Following a baseline assessment, the case management system will collect information on the services and their results. JCLA has hired an M&E specialist who will be focused on this issue, and the Bank team will follow up closely with JCLA management team to ensure that sufficient attention is paid to monitoring aspects.		
	Resp: Bank and implementer	Due Date: Ongoing	Status:
Other	Rating:		
Description:	Risk Management:		
	Resp:	Due Date:	Status:

4. Overall Risk Rating: Low

Comments: The capacity of the implementing agency is very high with a demonstrated record in the operating environment. While the implementing agency is capable of managing the expected risks, certain political economy risks, particularly related to resistance by vested interests and opposition of certain groups within and outside the government, may jeopardize some of the activities and affect sustainability.

