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Refugees' Access to Decent Work in Jordan:

The Gap Between the Legal Framework, Implementation and Lived Experience



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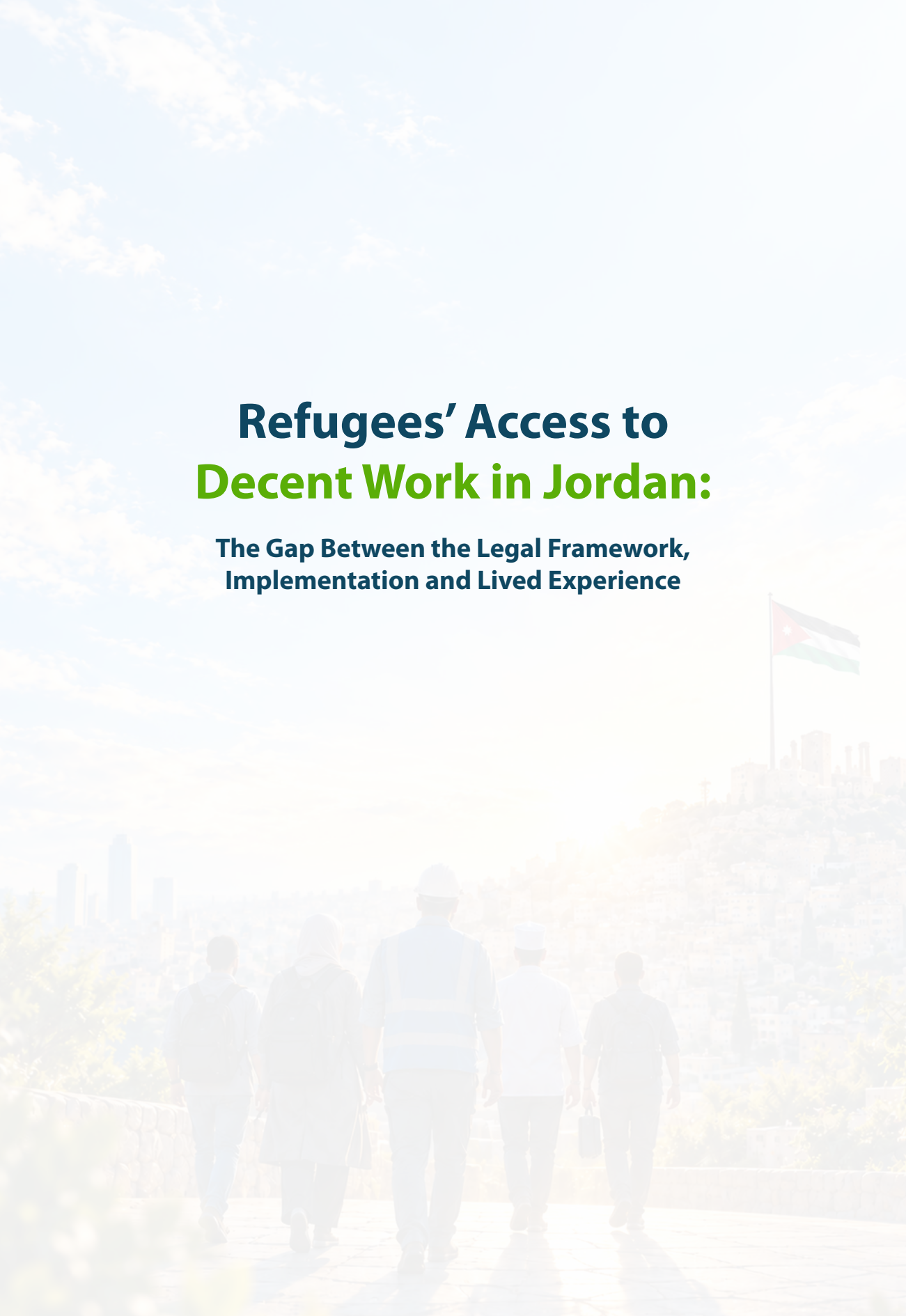
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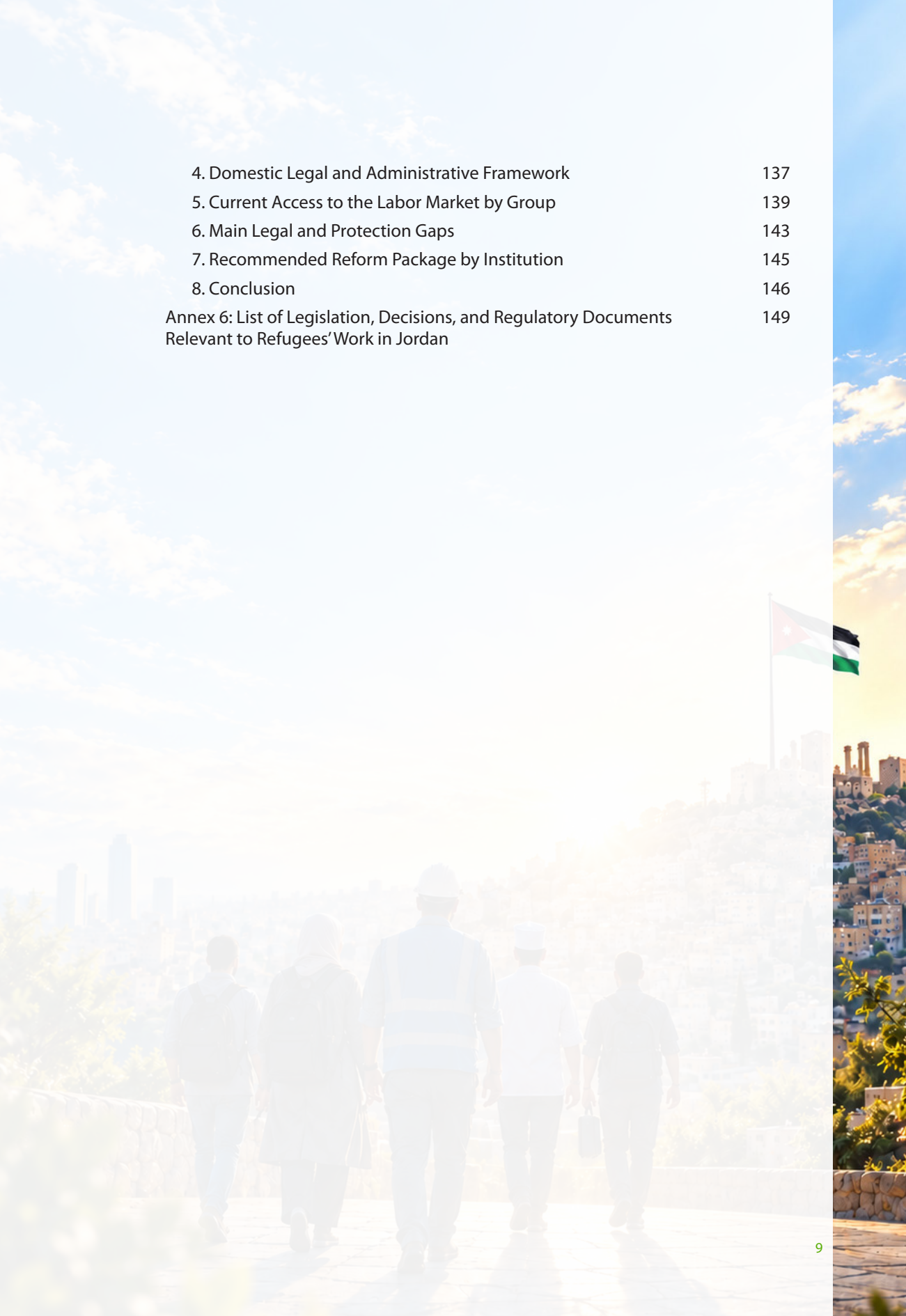
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Executive Summary

This study examines the extent to which Syrian, Iraqi, Yemeni, and Gazan refugees can access lawful and decent work in Jordan. It does so by analysing the gap between the legal framework and official procedures, on the one hand, and participants' lived experiences of the labor, on the other market. Firstly, assessing access to work should not be limited to whether a job exists or a permit can be obtained. Instead, it should cover the whole pathway: beginning with legal status, documentation, and residency, onto the work permit, occupation, contract, wage, and social protection, ending with inspection, complaints, and access to redress.

The study uses a mixed-methods approach, combining legal review and analysis, a quantitative survey of 202 participants from the groups in Amman, eight focus group discussions with 70 participants, and a key informant interview with the Director of the Migrant Workers Directorate at the Ministry of Labor. Comparing these sources makes it possible to distinguish between what legal rules establish, how official parties consider the implementation of those rules, and participant experiences. As the sample is purposive and non-random, the percentages reported reflect the study's participants and are not statistical estimations for all members of the four groups in Jordan.

The findings show that the four groups do not share a single experience of the labor market. Syrians benefit from a variety of work permit pathways, including ordinary, temporary, and flexible permits, whereas for Iraqis and Yemenis residency, fines, approvals, and work permits compound to create issues, while Gazans face a particular documentation complication linked to the white card, the temporary passport, and, upon occasion, the absence of a national number, despite official exemptions and facilities for work permits.

The study reveals a gap between the existence of a legal pathway and the ability to use it. Only 5.4% of all respondents reported holding a valid work permit: 10% of Syrians, 7.7% of Yemenis, and 4% of Gazans, while the Iraqi sample recorded no case of a valid permit. These figures do not reflect rates in the entire community, only the limited access to permits within the sample, which is linked to intersecting factors, including cost, residency, documentation, occupational restrictions, employers, and poor knowledge of procedures among the communities.

Residency rates stand out for Iraqis and Yemenis: 83.3% reported accumulated residency fines, with up to 90% among Iraqis. More than half of the Iraqis and Yemenis without a work permit also cited residency fines as one of the reasons they had not obtained one. This finding shows that the institutional separation between residency and work does not always appear that way in a person's experience.

The findings also show that access to work does not mean access to decent work. Of the respondents, 80.2% reported working without a written contract, and 69.5% those whogave income data of earned less than 290 JOD a month. In addition, 55% reported working more than eight hours a day, 49% late payment of wages, 27.7% occasionally not receiving wages, and 18.3% working under conditions they considered unsafe. None of these indicators alone amounts to a proven legal violation, but each reveals significant gaps in job quality and protection.

The study also shows that some of the qualifications and skills the workers have are not utilized. In all, 29.7% reported their current work as not matching their skills, up to 46.2% among Yemenis, while 61.9% reported that sectoral restrictions limit their ability to work in the profession they are trained in. The barrier constitutes of the exclusion of non-Jordanians in certain professions, the conditions for issuing a work permit, and the licensing requirements for practising regulated professions. The study does not conclude that legal restrictions are the only reason people work outside their field, but it shows that they are one of the factors narrowing the options open to some participants.

The qualitative findings show that some participants turn to less legal work arrangements, including working without a permit or contract, daily and temporary work, reliance on intermediaries or labor contractors, domestic work, and small-scale activities. These patterns alone are not evidence of exploitation, but some testimonies described unexplained deductions from wages, delayed payment of dues, document retention, threats of being reported to the police, and difficulty leaving the employment relationship. These cases are not automatically classified as trafficking in persons or forced labor, but require verification and referral to protective mechanisms.

The study reveals a disconnect in relations with official parties. Labor inspection plays a role in enforcing the Labor Law and protecting rights, yet some participants, particularly those working without a permit or in unstable residency situations, see it as a potential source of risk. 40.6% of respondents said they avoid going to government offices for fear of detention, being held responsible, or expulsion, within 61.5% of the Yemeni and 58% of the Iraqi populations.

This affects access to complaints and redress. Although official complaint channels exist and not holding a work permit does not, in principle, extinguish the rights from the employment relationship, no more than 7.4% said they had ever reported a labor violation. In contrast, 66.8% said they know where they can get legal aid. This disparity is one of the study's most important findings: knowing that a right or a competent body exists does not necessarily indicate a practical ability to enforce it.

The study shows that gender, age, education status, disability, and caregiving responsibilities may overlap with nationality and legal status. Within the sample, the proportion of women earning less than 290 JOD was higher than that of men, and focus group discussions included testimonies of harassment, mistreatment, and caregiving responsibilities. Non-Jordanian students face a regulatory restriction on combining study with lawful work. Testimonies concerning persons with disabilities point to possible barriers that require further inspection.

The main challenge is not a complete absence of a legal and institutional framework. Jordan has labor and residency legislation, a work permit system, an inspection apparatus, and mechanisms for complaints, social protection, and combating human trafficking. Instead, the problem lies in the gaps that appear between the legal rule, implementation, lived experience, the existence and application of a procedure, and a person's ability to understand and use it.

The study does not call for opening the labor market without boundaries or creating an entirely separate system for refugees, but for making the existing framework clearer, more usable, and better integrated, while preserving the priority given to employing Jordanians and the requirements of labor market regulation. The recommendations focus on seven main areas: developing a clearer procedural pathway to lawful work, addressing the overlap between residency and work permits, unifying official information and addressing the barriers specific to each group, reviewing occupational restrictions and linking skills to labor market needs, strengthening decent work conditions and social protection, monitoring based on outcomes rather than the number of measures alone, and reinforcing inspection, complaints, and protection from exploitation.

Overall, the study indicates that improving the target groups' access to decent work does not necessarily conflict with protecting the Jordanian labor market. The clearer and more usable legal pathways are, the greater the capacity to regulate employment, monitor working conditions, extend social protection, and reduce informal work and exploitation becomes. The central question is not whether a person can work, but whether they can access lawful and decent work, make use of their skills, and effectively protect their rights when they are violated.

1. Introduction to the Study

Labor market regulation is one of the core pillars of Jordan's Economic Modernization Vision, due to its links to creating productive jobs, raising income and productivity, improving the economy's competitiveness, and strengthening economic and social stability, with employment and economic growth at the heart, aiming to create more than one million jobs for Jordanians by 2033.[1] The Vision's second Executive Programme for 2026–2029 reinforces a monitoring approach based on impact and performance indicators, and includes measures aimed at improving Jordan's ranking in numerous international indices and reports.[2]

In this context, regulating the work of non-Jordanians and refugee groups cannot be seen as separate from reform of the national labor market. Informal work, the absence of contracts, weak social protection, and unclear responsibilities between worker, employer, and intermediary are all factors that can limit the state's ability to regulate the labor market, monitor its conditions, and enforce the legislation that governs it. Conversely, clear and usable pathways to lawful work can help strengthen compliance, reduce informal work arrangements, extend social protection, and improve the competent authorities' ability to monitor wages, working conditions, and violations.

Improving refugees' access to lawful and decent work does not mean conflicting with the priority given to employing Jordanians with or the state's right to regulate the labor market and determine what occupations and activities are open to non-Jordanian workers. The aim is to strike a balance between protecting job opportunities for Jordanians while reducing informal work and the risks of exploitation on the other through clear and workable rules and regulatory pathways suited to the reality of the labor market.

1. Hashemite Kingdom of Jordan, Economic Modernization Vision: Unleashing Potential to Build the Future, 2022. In particular the Vision's goals of increasing job opportunities for Jordanians from about 1.6 million to about 2.6 million by 2033, and improving Jordan's international competitiveness.
2. Hashemite Kingdom of Jordan, Second Executive Programme of the Economic Modernization Vision 2026–2029, 2026. The programme includes 126 key impact indicators and more than 300 sub-indicators, along with plans to improve Jordan's position in international indices and reports.

This is significant in Jordan's case, as the groups covered in this study differ in legal and documentary situations and do not have access to the same regulatory pathways. Particularly, since 2016, special arrangements have developed to ease Syrians' access to certain sectors of the labor market, including different types of work permits. Meanwhile, pathways available to Iraqis, Yemenis, and Gazans differ in terms of residency, documentation, work permits, and other regulatory requirements.[3] A single experience of the labor market cannot be assumed for all groups. Instead, the effect of differences in legal status, documentation, residency, and regulatory pathways on the actual ability to access lawful and decent work must be examined.

The issue also intersects with Jordan's human rights obligations. In Jordan's fourth Universal Periodic Review (UPR) cycle in 2024, Jordan supported a set of recommendations directly linked to the subject of this study. They included ensuring that workers, including migrant workers, have access to relevant authorities to submit complaints and grievances to, strengthening the protection of migrant workers, improving their rights and working conditions to prevent exploitation and abuse, strengthening the enforcement of fair and ethical recruitment rules, ensuring access to effective remedies, improving access to the labor market, guaranteeing migrant workers' right to collective bargaining, and combating violence and discrimination against migrant workers, ensuring their access to justice and addressing discrimination against migrants and refugees by law enforcement officials and public servants.[4]

From this angle, studying the reality of refugee groups' access to decent work offers a practical tool for helping to follow up these commitments, because it moves beyond texts and policies to examine how rules and procedures work in practice, and how far the people concerned can understand them, access them, and use the protective mechanisms linked to them.

Labor regulation is linked to Jordan's efforts to combat human trafficking, forced labor, and forms of severe exploitation. Practices such as document retention, withholding wages, threats, restricting a worker's ability to leave the job, or reliance on intermediaries in relationships that lack transparency may, depending on the circumstances of each case, constitute indicators that call for verification of whether more serious exploitation. The presence of one indicator on its own does not necessarily amount to human trafficking or forced labor, because that legal characterisation requires the facts and legal elements of each case to be examined individually is present.

Jordan has taken legislative and institutional steps to combat trafficking, including amending the legal framework, strengthening victim protection arrangements, and adopting a national anti-trafficking strategy for 2024–2027. The US Department of State's 2024 Trafficking in Persons Report placed Jordan in Tier 2, concluding that the government does not fully meet the minimum standards for the elimination of trafficking, but is making significant efforts to do so, and noting an increase in investigative efforts, the identification of potential victims, and the development of protection arrangements.[5]

3. Hamdi Al-Qbeilat, [The Legal Framework for Refugee Work in Jordan: A Study of the Regulation of Syrian, Iraqi, Yemeni and Palestinian Labor], study prepared for the Information and Research Center – King Hussein Foundation (IRCKHF), 2026, esp. pp. 9–12.
4. Human Rights Council, Report of the Working Group on the Universal Periodic Review: Jordan, A/HRC/56/10, 15 March 2024, recommendations 136.4 and 136.192–136.196.
5. U.S. Department of State, 2024 Trafficking in Persons Report: Jordan (Washington, DC: U.S. Department of State, 2024).

The 2023 Global Slavery Index provides further international context, estimating the prevalence of modern slavery in Jordan at around 10 per thousand people, the fourth-highest estimated rate among Arab countries. It also scored the Jordanian government's response at 46 out of 100, against a regional average of 43.[6] These figures should be treated within the limits of the Index's methodology, as international estimates, not official statistics of proven cases in Jordan.

Improving labor regulations, reducing reliance on opaque intermediation arrangements, strengthening contracts and social protection, easing the process of reporting violations, and increasing the capacity of inspection and competent authorities to identify indicators of severe exploitation can support labor market regulation, worker protection, and efforts against human trafficking and forced labor, helping to strengthen Jordan's performance in the relevant international assessments and indices.

This study does not assume that all forms of informal work constitute trafficking or modern-day slavery, nor that everyone belonging to the groups it covers faces the same conditions. Instead, it examines how factors such as unstable legal status, working with no contract or permit, dependence on the employer or intermediary, poor knowledge of procedures, and fear of dealing with authorities can limit a workers' ability to protect and claim their rights.

Hence, the importance of expanding the question from "Can a refugee access work?" to "Can they access lawful and decent work?" Decent work is not limited to having a source of income, it constitutes of a stable employment relationship, fair terms, wages, working hours, occupational safety and health, social protection, freedom from discrimination and exploitation, and the possibility of claiming rights and accessing redress when violations occur.

This question matters because the legislation regulating Jordan's labor market does not, in principle, establish a comprehensive, stand-alone system for refugee employment. Instead, it regulates their entry into the labor market within the general rules on employing non-Jordanian workers with arrangements and exceptions that differ between groups.[7] Yet, a refugee's legal status may differ in important respects from that of a foreign worker who entered Jordan primarily to work. Particularly where labor or residency violations overlap with procedures that may lead to deportation or removal, or where considerations arise of protection against return to a place where the person could face a risk that the law prohibits exposing them to. The study addresses these matters in more detail in the later legal and analytical sections.

In light of this, the study seeks to analyse the gap between the legal framework regulating official work procedures and implementation, along with the lived experience of the target groups in the labor market. It focuses on Syrians, Iraqis, Yemenis, and Gazans, with the aim of identifying similarities and differences in their pathways and understanding the factors that facilitate or obstruct the transition to lawful and decent work.

6. Walk Free, The Global Slavery Index 2023 (Perth: Minderoo Foundation, 2023), "Arab States," tables 11 and 13; Walk Free, Global Slavery Index 2023: Jordan Country Snapshot.
7. Al-Qbeilat, [The Legal Framework for Refugee Work in Jordan], pp. 3–12.

The study is not limited to work permits. It covers an interconnected chain beginning with legal status, documentation, and residency, moving on to access to a work permit, the occupations available, and the possibility of making use of education and skills, passing through the nature of the employment relationship, contracts, wages, and social protection, and extending to informal work, intermediaries, inspection, labor violations, and the possibility of filing a complaint and receiving justice.

Ultimately, the study proceeds with the view that regulating refugees' access to decent work is not only a matter of social protection, but is also linked to labor market efficiency, reducing unregistered work, strengthening the rule of law, preventing exploitation and trafficking, and following up Jordan's human rights commitments. Improving this pathway should therefore not be seen as a benefit directed at refugees alone, but as part of building a labor market that is better regulated, more stable, and better able to protect rights, while preserving the priorities of employing Jordanians and regulating the employment of non-Jordanian workers.

2. Study Methodology

The study adopted a mixed-methods approach combining legal analysis, quantitative research, and qualitative research in order to examine refugees' access to decent work in Jordan from multiple angles rather than analysing legal texts or participants' experiences in isolation.

The study covered four groups: Syrians, Iraqis, Yemenis, and Gazans; chosen because they differ in legal status, documentation, and routes to residency and work permits, which allows the effect of these differences on access to lawful and decent work to be examined.

The study drew on four main sources of evidence: legal review and analysis, the quantitative survey, focus group discussions, and a key informant interview with the Ministry of Labor. These sources were compared and cross-checked to distinguish between what legal rules establish, what official bodies explain about how they are applied, and what appears in participants lived experiences.

1. Legal Review and Analysis

The legal component was based on a review of the legislation, regulations, instructions, and policies relevant to regulating the work of non-Jordanians and refugees in Jordan, as well as the frameworks relating to residency, international protection, labor rights, social protection, inspection, complaints, and anti-trafficking measures.

In particular, the study drew on two legal analyses prepared as part of the research:

- Prof. Hamdi Al-Qbeilat, "The Legal Framework for Refugee Work in Jordan: A Study of the Regulation of Syrian, Iraqi, Yemeni and Palestinian Labor";
- Dr. Samer Haddadin, "Legal Gap Analysis: Refugee Protection and Access to Lawful Work in Jordan".

The two analyses were used to identify the legal rules governing access to work, the differences between the four groups, and potential gaps between the legal framework and implementation. Both full analyses are attached in the study's annexes.

The review also covered the Labor Law and the regulations, instructions, and decisions issued under it: the Law on Residence and Foreign Affairs, legislation on social security, anti-trafficking and regulated professions, the UNHCR–Government of Jordan Memorandum of Understanding, and relevant official documents and policies.

The legal analysis was used as a tool for the field research in examining how far the practices and perceptions that emerged among the participants matched official rules and procedures.

2. Quantitative Research

The study used a survey to collect quantitative data on the target groups' experiences in the labor market.

The total sample size was 202 participants, distributed by nationality as follows:

- Syrians: 50 participants;
- Iraqis: 50 participants;
- Yemenis: 52 participants;
- Gazans: 50 participants.

A balance between women and men was maintained within each group, at around 50% each.

Data was collected between 28 June and 23 July 2026 in the capital, Amman.

Participants were selected through an intentional sample drawn from the four groups of people, aged 18 or above, who were working or looking for work in Amman. A similar quota of around 50 participants was set for each nationality to ensure a large enough number to analyse each group's experience and compare it with the others, not to represent the relative size of each nationality within the refugee population in Jordan.

Refugee networks and communities in Amman were used to reach participants, supported by chain referral (snowball sampling) to reach individuals who met the participation criteria.

Data was collected through face-to-face interviews using KoboToolbox on tablets provided to the researchers, after they had been trained on the survey and the principles of data collection.

The platform was chosen for the capabilities it offers for automated data validation, applying conditional logic to questions, daily monitoring of fieldwork, managing researcher permissions, and reducing the need for manual data entry and the errors that come with it.

The survey mainly covered:

- Legal status and documentation;
- Residency and fines;
- Work permits and the barriers to obtaining them;
- The nature of the work and how steady it is;
- Contracts, wages, and working hours;
- Social security and health insurance;
- Occupational restrictions and how well work matches skills and qualifications;
- Working conditions and the problems and violations participants reported;
- Inspection and dealings with official bodies;
- Complaints, legal aid, and access to justice.

The data was analysed in SPSS, relying mainly on descriptive analysis of the variables and comparisons by nationality, gender, age, and other characteristics where the data allowed.

Because of how the sample was selected, the percentages in the study are used to describe the participants covered by the research, not to estimate the prevalence of phenomena among all refugees of the four nationalities in Jordan. The sample is not random and was built on similar quotas across the four nationalities using chain referral, so as to not allow statistical generalisation to the refugee population as a whole.

3. Focus Group Discussions

Focus group discussions were used to deepen understanding of the quantitative findings and to explore experiences and factors that are difficult to explain through the survey alone.

Eight focus group discussions were held, two for each group, with 70 participants distributed as follows:

- Syrians: 19 participants, 10 men and 9 women;
- Iraqis: 18 participants, 9 men and 9 women;
- Yemenis: 19 participants, 9 men and 10 women;
- Gazans: 14 participants, 7 men and 7 women.

The sessions were held between the 14th and 25th of July 2026 at the premises of the Information and Research Center – King Hussein Foundation in Amman.

Participants were reached through nominations from activists and community leaders within the four target communities, with attention, as much as possible, to diversity in gender, age, labor market experience, employment status, and sector of work.

The discussions focused on the lived experience of accessing the labor market, documentation and residency, work permits, occupational restrictions and working outside one's field, contracts, wages, and working hours, less formal work arrangements and intermediaries, inspection, labor problems and violations, and access to complaints and legal aid.

The sessions allowed participants to explain some of the patterns that emerged in the survey and to describe how legal rules and administrative procedures affect with their daily reality.

The outputs were analysed thematically by identifying recurring themes and patterns and the differences between groups, then comparing them with the quantitative data and the legal framework.

The study does not treat individual testimonies from the focus group discussions as evidence that a practice is widespread among all members of a group. It uses them to explain patterns, show differences in experience, and identify issues that call for further verification.

4. Key Informant Interview with the Ministry of Labor

After part of the quantitative and qualitative analysis had been completed, a key informant interview was held on the 11th of August 2026 with Riyad Barham, Director of the Migrant Workers Directorate at the Jordanian Ministry of Labor, at the Ministry's premises.

The interview aimed to clarify issues that appeared unclear or contradictory in the field data. Specifically:

- Work permit requirements for the four groups;
- The relationship between the work permit and residency;
- The relationship between Ministry of Labor procedures and registration with UNHCR;
- The types of work permit available to Syrians;
- The situation of Iraqis and Yemenis;
- The situation of Gazans and the fees and documents relating to the permit;
- The occupations and activities available and the licensing requirements for some professions;
- Inspection and joint campaigns;
- Complaints and the rights of a worker without a work permit;
- The situation of non-Jordanian students;
- Some issues relating to women, informal work, and intermediaries.

The Ministry of Labor's account was not used to override or replace participants' accounts, but as a source clarifying the official interpretation and procedure. Where participants' accounts differed from the official clarification, the difference was treated as a finding worth analysing, which may reflect differences in implementation, knowledge, or understanding of procedures or in the circumstances of individual cases.

5. Integrating the Evidence and the Analytical Framework

The study relied on cross-checking between sources of evidence rather than analysing each component separately.

In general, the analysis followed a sequence: Identifying the relevant legal rule, considering the official procedure or interpretation of how it is applied, comparing this with the quantitative findings from the survey, interpreting those findings in light of the qualitative experiences that participants described in the focus group discussions, and identifying the gaps between legal text, implementation, lived experience, and consequences. When an issue emerged, such as difficulty obtaining a work permit, it was compared with participants' explanations in the focus group discussions, then read in light of the legal framework and official clarifications.

This helped to distinguish between three levels:

1. What the legal rule or official instructions establish;
2. What official parties explain about how these rules are applied;
3. What participants experience or understand in practice.

A difference between these levels does not necessarily imply a legal violation; it may arise from differences in implementation, the number of bodies involved, gaps in information, or differing individual circumstances. Therefore, the study avoided drawing conclusions that the available evidence does not support.

The analytical framework was based on the concept of access to decent work, not merely access to any job. The study therefore covered the whole pathway a person goes through: starting with their legal status and documentation, moving through residency, the work permit, and the occupations available, then the contract, wages, working hours, social protection, and occupational safety and health, and ending with inspection, complaints and access to redress.

This approach made it possible to identify the stages at which barriers may accumulate and how those effects can extend into later stages of the work experience.

6. Ethical Considerations

The study was carried out in line with the research ethics guide adopted by the Information and Research Center – King Hussein Foundation, which outlines the principles and procedures to be observed in quantitative and qualitative research. These include respect for participants' dignity and autonomy, voluntary participation and informed consent, avoiding harm, justice, and protection of privacy and data confidentiality, with additional safeguards when working with vulnerable groups.[8]

In line with these principles, the research ensured voluntary participation, respect for privacy, and doing no harm to participants, taking into account the sensitivity of their legal and employment situations and the protection circumstances some of them may be living in. Data was handled to preserve confidentiality: the survey data was cleaned and participants anonymised before analysis and the findings are presented in an aggregate form that limits the possibility of identifying individuals.

The final analysis avoided including unnecessary personal information. Qualitative testimonies were used in a way that preserves the substance of the experience without revealing the identity of the person concerned. Sensitive topics, including residency, working without a permit, detention, harassment, and exploitation, were also handled in a way to avoid exposing participants to additional risk, stigma, or potential harm.

Testimonies about individual experiences were treated as participants' accounts and perceptions, not as established legal facts unless an independent source allowed them to be verified. The focus group discussions also included an awareness-raising element that gave participants practical information on rights, complaint channels, services, and the relevant protective mechanisms.

7. Limitations of the Study

The findings should be interpreted in light of a number of methodological limitations.

First, the study relies on a purposeful, not random sample built on similar quotas across the four groups using chain referral; the percentages reported therefore do not represent statistical estimates for all Syrians, Iraqis, Yemenis, and Gazans in Jordan.

Second, part of the data relies on participants' self-reports about their legal status, work experiences and the problems they have faced. As a result, some answers may reflect the participant's understanding of the rule or procedure rather than the official legal status.

8. Information and Research Center – King Hussein Foundation (IRCKHF), Ethical Research Guidelines for IRCKHF: Handbook, last updated 24 March 2025, sections on core ethical principles, informed consent and participants' rights, data confidentiality and protection, and ethical field data collection practices.

Third, some questions dealt with complex legal and administrative matters. Topics on which ambiguity or inconsistencies emerged were therefore compared with the legal analysis and the clarifications provided by the Ministry of Labor.

Fourth, the sample size and study design do not allow multivariate statistical analysis of all the intersections between nationality, gender, age, disability, student status, and other characteristics, so some of these were therefore addressed in a qualitative, exploratory way.

Fifth, institutional interviews were limited to the **Ministry of Labor**. Interpretation of matters within the remit of other bodies, such as the Ministry of Interior, the Social Security Corporation, and professional regulatory bodies relied mainly on the legislation and official documents available, rather than on direct interviews with them.

Sixth, the study does not aim to establish individual cases that may legally constitute trafficking or forced labor. Testimonies concerning document retention, threats, withheld wages, and similar issues were used as indicators calling for attention and verification, not as a final legal characterisation of the case.

8. Scope of Interpretation of the Findings

The study provides an analytical picture of the relationship between the legal framework, official procedures, and the lived experience of the four groups covered by the research.

It does not aim to provide a national statistical estimate of the conditions of all refugees in the Jordanian labor market, but to identify the patterns, barriers, and gaps that emerge when legal, quantitative, and qualitative evidence is compared and to understand how these affect the transition from mere access to a job to access to lawful and decent work that allows workers to protect their rights and utilize their skills.

3. The Legal and Institutional Framework Governing Refugee Work in Jordan

Refugee work in Jordan is not governed by a dedicated national law establishing a separate regime for refugees' right to work. It is shaped instead by the interaction of a set of laws and administrative rules on labor, residency, and foreigners' affairs, work permits, the regulation of professions, social protection, and anti-trafficking with the Memorandum of Understanding, signed by the Government of Jordan and UNHCR, and the special arrangements the authorities have developed for certain groups.

As a result, a refugee entering the labor market is, as a general rule, subject to the rules governing the employment of non-Jordanian workers, unless a specific provision or arrangement applies to their group. This general rule does not, however, produce a single pathway for all groups. The situations of Syrians, Iraqis, Yemenis, and Gazans differ in terms of residency and documentation, the type of work permit available, fees, and the professions and activities in which they have access to. These legal and procedural differences are one of the keys to understanding the variation that the field findings in the following chapters reveal.

1. The General Constitutional and Legal Framework for Work

The Jordanian Constitution lays the general foundation for labor legislation. Article 23 states that "work is the right of all citizens" and that the State shall provide it for Jordanians. It also sets out a number of principles on which labor legislation should be based, including wages, working hours, weekly and annual rest, compensation in certain cases, the conditions of work for women and youth, occupational health and safety, and trade union organisation. The constitutional right to work, as worded in the Article, attaches to Jordanian citizens, while the possibility of work for non-Jordanians, including refugees, is determined by the laws, regulations and instructions governing their employment.

Labor Law No. 8 of 1996, as amended, defines "worker" in Article 2 without making nationality an element of the definition. So, as a general rule, the protections arising from the employment relationship apply to Jordanian and non-Jordanian workers alike wherever the provisions of the Law apply to them, but there are special provisions on nationality, the regulation of the employment of non-Jordanian workers, and certain rights related to trade union organisation.

Article 12 of the Labor Law is the direct basis for regulating the employment of non-Jordanian workers. It requires the approval of the Minister of Labor or an authorised delegate for the recruitment or employment of a non-Jordanian worker and that the need for the worker be linked to experience or competence not available among Jordanian workers or to an insufficient number of qualified Jordanian workers. It also requires a work permit to be obtained before recruitment or employment, and allows the professions, ratios, conditions, and guarantees relating to the employment of non-Jordanian workers to be regulated.

The same Article also treats the employment of a non-Jordanian worker without a permit for an employer other than the one they are permitted to work for or in a profession other than the permitted one as violations under the conditions set by the Law. The Law allows the Minister to issue a decision to deport a non-Jordanian worker in the cases it specifies, with the competent authorities carrying out the decision in accordance with legal procedures.

This provision is especially significant for refugees, because the legal rule was drafted primarily to regulate the employment of non-Jordanian workers in the labor market and does not in itself create a separate regime for people who may have international protection needs. Therefore, applying it to a refugee requires a distinction between a breach of labor-market rules and any other legal considerations relating to protection status or to the destination to which a deportation or removal decision may be carried out. This does not mean that every deportation or removal decision is in itself a breach of the principle of non-refoulement. The issue may arise, however, where carrying out the decision results in the person being returned to a place where they face a risk prohibited by the relevant legal rules on protection.

2. Residency and Foreigners' Affairs and Relationship to Work

Residency status is a significant factor in whether certain groups can access lawful work. The Law on Residence and Foreigners' Affairs No. 24 of 1973, as amended, governs the entry and residence of foreigners in Jordan and sets general rules for obtaining and renewing a residence permit, along with the exceptions and powers vested in the competent authorities.

The residency rules do not affect all nationalities in the same way. The legal review points to an administrative distinction between nationalities that are restricted by the residence permit requirement and those who are not subject to its requirements in the same way. According to the materials reviewed, the latter group includes Syrians and certain categories of Palestinians, among them, Gazan white card holders and holders of temporary Jordanian passports, while Iraqis and Yemenis are subject to a different route relating to residency and its renewal.[9]

These differences matter because they intersect with work permit procedures. In the interview conducted for the study, the Director of the Migrant Workers Directorate at the Ministry of Labor explained that in cases requiring the approval of the Ministry of Interior, the Ministry of Labor does not complete the issuance of the work permit before that approval is received. He also explained that the Ministry of Labor does not treat a person's UNHCR file as a direct condition for issuing a work permit; rather, it deals with residency requirements and with approvals that fall within the Ministry of Interior's remit.[10]

Three levels should therefore be distinguished: residency rules, which fall primarily within the remit of the Ministry of Interior; work permit rules, which the Ministry of Labor applies; and protection status or registration with UNHCR. These levels may overlap in an individual case, but they are not a single administrative procedure and are not all subject to the same authority.

9. Al-Qbeilat, op. cit.
10. Research interview with Riyad Barham, Director of the Migrant Workers Directorate, Jordanian Ministry of Labor, conducted by the Information and Research Center – King Hussein Foundation, 11 August 2026.

3. Legal Status of Refugees in Jordan

Jordan is still not a party to the 1951 Refugee Convention or its 1967 Protocol and there is no comprehensive national asylum law setting out, in a single piece of legislation, the procedures for seeking protection and the legal status, rights, and safeguards of refugees.

An important part of the practical protection framework rests on the Memorandum of Understanding signed by the Government of Jordan and UNHCR in 1998, which was later partially amended. The Memorandum adopted a refugee definition drawn from the 1951 Convention and included the principle that a refugee should not be returned to a place where their life or freedom would be threatened under the conditions it sets out.[11]

The Memorandum of Understanding does not create a separate regime for refugee employment outside national legislation; instead, it links the exercise of work to the legal framework in force in the Kingdom. As a general rule, refugee status does not confer a general exemption from work permit requirements or the rules governing the employment of non-Jordanians, although special arrangements or exemptions may still apply to certain groups.[12]

A refugee's practical position in the labor market is not determined by refugee status alone, but by its interaction with nationality, residency, documentation, the rules governing work permits, the type of profession, and any administrative arrangements specific to the group concerned.

4. Regulation of Work Permits and the Different Paths

While the target groups are usually subject to the general framework governing non-Jordanian workers, government policies and procedures have developed different pathways for certain nationalities. This disparity is most visible when Syrians are compared with the other groups.

Under the Ministry of Labor's Comprehensive Guide of Principles for Issuing Work Permits for Non-Jordanian Workers, several types of permits are available to Syrian workers. These include the ordinary permit, tied to a specific employer and profession; the temporary permit, linked to cash-for-work projects, internationally funded projects, and other related projects; and the flexible permit, which allows work for more than one employer within the professions and professional group covered by the permit, without being restricted to one geographical area.[13]

In the interview conducted for the study, the Ministry of Labor officially confirmed the distinction between ordinary, temporary, and flexible permits, explaining that the nature of each permit determines how much the worker is tied to a particular employer and the range of professions they can practise.[14]

11. Government of the Hashemite Kingdom of Jordan and Office of the United Nations High Commissioner for Refugees, Memorandum of Understanding, April 5, 1998, as partially amended in 2014.
12. Al-Qbeilat, op. cit.
13. Jordanian Ministry of Labor, The Comprehensive Guide of Principles for Issuing Work Permits for Non-Jordanian Workers, section "Work Permits for Non-Jordanian Workers of Syrian Nationality", version published on the Ministry's website, 2026.
14. Interview with Riyad Barham, Ministry of Labor, 2026.

Iraqis and Yemenis, in contrast, have no pathway like the flexible permit for Syrians within the materials reviewed. Their access to work permits is governed to a greater extent by the general rules on the employment of non-Jordanian workers, along with residency requirements, the necessary approvals, the permitted professions and activities, and the relevant fees.

Gazans have special arrangements. The Ministry of Labor's official guide exempts Gazans from work permit fees, additional amounts, and the revenue stamp fee, under the conditions it sets, with 10 JOD charged for the application review service.[15] In January 2025, the Ministry of Labor announced that it would accept the white card issued to Gazans in place of the temporary passport requirement to issue work permits in order to simplify the procedure.[16]

This variation shows that using the expression "refugee work" as if it referred to a single legal regime may obscure fundamental differences in the accessibility of lawful work. Nationality, document type, residency status, permit type, and profession are not separate elements. Together they make up the actual legal pathway for each group.

5. Professional Regulatory Bodies and the Regulation of Professions and Activities

Being able to obtain a work permit is not enough to enter any profession a worker chooses, because the employment of non-Jordanian workers is also subject to the regulation of the professions and economic activities within which permits may be issued.

The Ministry of Labor official explained that in practice the system is not limited to the concept of "closed professions", but rests on specifying the activities and professions in which work permits may be issued to non-Jordanians, in accordance with the applicable decisions and criteria. The inability to issue a permit for a given profession may therefore result from that profession not being included among those open to non-Jordanians, and not necessarily from the existence of a provision using the label "closed profession".[17]

In addition, some professions are subject to professional regulation separate from the work permit. Health, engineering and other regulated professions may require a licence or approval from a competent ministry, professional association, or another regulatory body. A distinction should be drawn between the work permit, which regulates the employment of a non-Jordanian worker and the licence to practise, which certifies that the requirements for practising a regulated profession have been met.[18]

This distinction matters in interpreting some of the field experiences. A participant may describe being unable to practise their profession as being "banned from working", when the legal barrier may relate to the work permit, the licence to practise, or both.

15. Jordanian Ministry of Labor, The Comprehensive Guide of Principles for Issuing Work Permits for Non-Jordanian Workers, section "Work Permits for Gazans", which provides for exemption from the work permit fee, the additional amount and the revenue stamp duty, with ten dinars charged for the application review service.
16. Jordanian Ministry of Labor, "[Minister of Labor: To make things easier for Gazans, the white card will be accepted instead of the temporary passport for issuing work permits]", 23 January 2025.
17. Interview with Riyad Barham, Ministry of Labor, 2026; Jordanian Ministry of Labor, The Comprehensive Guide of Principles for Issuing Work Permits for Non-Jordanian Workers.
18. Interview with Riyad Barham, Ministry of Labor, 2026.

6. Labor Rights and Social Protection

A distinction should be drawn between the lawfulness of a worker's presence in the labor market, in terms of the permit, and the rights that arise from the employment relationship itself. The Labor Law's definition of a worker is not, as a general rule, based on nationality, and the legal review found that general labor protections apply to non-Jordanian workers, subject to the exceptions and special provisions set out in the Law.[19]

In the interview, the Ministry of Labor's official confirmed that not holding a work permit does not, as a general rule, extinguish a worker's right to claim wages and the rights that come from the employment relationship, and that a permit-related violation should be distinguished from a claim for labor rights.[20]

The general protection framework covers wages, working hours, leave, occupational safety and health, work injuries, and some forms of protection from assault and harassment, as well as social security coverage wherever the legal conditions for it are met.

Amendments to the Labor Law have strengthened some forms of protection relating to violence and harassment in the workplace, including provisions that allow a worker, in cases specified by the Law, to leave work without notice while retaining their rights when subjected to assault or harassment, under the prescribed legal conditions.

However, the existence of a right in legislation does not necessarily indicate the practical ability to use it. The study examines this later through its findings on contracts, wages, social security, working conditions, complaints, and access to justice.

7. Protection from Exploitation and Trafficking

The Human Trafficking Prevention Act No. 9 of 2009, as amended, forms part of the relevant legal framework when the facts go beyond a mere labor violation to indicators that may point to more serious exploitation.

The amending Law No. 10 of 2021 strengthened some aspects of the protection and assistance provided to victims and increased some penalties. Regulation No. 6 of 2023 on the Fund for Assisting Victims of Human Trafficking and Regulation was issued, along with Regulation No. 46 of 2023 on Shelters for Victims and Persons Harmed by Human Trafficking Crimes was amended.[21] Jordan is currently implementing the National Strategy to Combat Human Trafficking 2024–2027, which is built on the pillars of prevention, protection, prosecution, partnership, and cooperation.[22]

19. Labor Law No. 8 of 1996, as amended, Article 2; Al-Qbeilat, op. cit.
20. Interview with Riyad Barham, Ministry of Labor, 2026.
21. Human Trafficking Prevention Act No. 9 of 2009, as amended; Amending Law No. 10 of 2021; Regulation No. 6 of 2023 on the Fund for Assistance to Victims of Human Trafficking; Amending Regulation No. 46 of 2023 to the Regulation on Shelters for Victims of and Persons Affected by Human Trafficking Crimes.
22. Jordanian Ministry of Justice, [National Strategy for Combating Human Trafficking 2024–2027].

This body of law matters for the study when indicators appear such as document retention, threats, withholding of wages, restrictions on the worker's ability to leave the job, or the use of their legal status as leverage. No single indicator on its own is enough to classify a case as trafficking; legal characterisation requires the elements of each case to be examined individually. The appearance of such indicators does, however, mean that the case should not be treated as merely a work permit or residency violation before the possibility of more serious exploitation has been checked.

8. Institutional Framework and the Allocation of Responsibilities

The regulation of work for the target groups involves multiple authorities whose responsibilities overlap at the different stages of providing access to work and protecting rights.

The Ministry of Labor is responsible for regulating the employment of non-Jordanian workers, issuing work permits, inspecting the application of the Labor Law, and handling labor complaints within its remit.

The Ministry of Interior is responsible for residency matters and the approvals within its remit, as well as for decisions and measures concerning the legal status of foreigners and removal under the legislation in force.

The Public Security Directorate and the competent security agencies play roles in carrying out certain measures and decisions, taking part in joint campaigns, and combating trafficking within their prescribed legal powers.

The courts have jurisdiction to make decisions regarding labor disputes and claims under the applicable rules of jurisdiction and procedure, while the Social Security Corporation implements the social insurance scheme to workers who meet the conditions for coverage.

Ministries, regulatory bodies and professional associations also have responsibilities for licensing and practice in certain professions, so a worker's entry into a particular profession may require an approval or licence beyond the issuance of a work permit.

The UNHCR carries out registration, protection, and service functions linked to its mandate, but it does not issue work permits or take the place of the Jordanian authorities responsible for regulating residency and the labor market.

The number of authorities involved explains part of the complexity that appears in the field experience. A worker may see the process as a single administrative pathway, while the decisions are in fact divided between the Ministry of Labor, the Ministry of Interior, the professional regulatory body, and other authorities. Being able to understand this division and to reach the right information is part of the practical ability to use the system itself.

9. Summary of the Legal and Institutional Framework

This framework shows that the regulation of refugee work in Jordan is not the responsibility of a separate, unified legal regime, but the interaction of rules on labor, residency, work permits, the regulation of professions and social protection, as well as asylum and anti-trafficking rules.

This system does not have the same effect on the four groups. Syrians benefit from a variety of work permit pathways, while Iraqis' and Yemenis' access is more affected by the overlap between residency, the work permit, and the related approvals, and Gazans are subject to a document-based, regulatory status that includes specific exemptions and facilitations.

Assessing access to decent work should therefore not be limited to asking whether a legal possibility to work exists. It should examine whether that possibility is actually usable. Can the person meet the residency and documentation requirements? Can they obtain a suitable permit? Is the profession open to them? Do they need an additional professional licence? And can they use their rights and the protective mechanisms when a dispute arises?

From this point, the study turns to the analysis of the field findings, starting with the effect of legal status and official documents, in determining the actual ability to enter the labor market.

4. Legal Status and Official Documents as a Gateway to the Labor Market

The study's findings show that legal status and the type of official documents a person holds are not merely an administrative background to their presence in Jordan. They are linked to the person's ability to enter the labor market, to access certain opportunities, and to move into and remain in lawful work. The four groups covered by the study do not enter the labor market from a single legal position, nor do they face the same requirements relating to residency, documentation, and work permits. This makes nationality, legal status, and document type important elements in shaping the path a person takes towards lawful work.[23]

The quantitative data confirms the importance of this factor: 84.2% of respondents reported that their legal status negatively affects their ability to find or keep work.[24] This effect does not appear in the same way in all groups. The nature of the barriers varies according to residency requirements, the type of documents used, the possibility of obtaining a work permit, and procedures that involve more than one official authority.

23. Al-Qbeilat, op. cit.; IRCKHF, [Qualitative and Quantitative Field Research Outputs: Study of Refugees in the Jordanian Labor Market], 2026.
24. IRCKHF, [Key Survey Findings: Study of Refugees in the Jordanian Labor Market], 2026, finding on the question about the effect of legal status on the ability to find or keep work.

1. Differences in Legal Status Between the Target Groups

The legal review showed that the four groups are not subject to a single, uniform route in relation to residency and work. Syrians benefit from special work permit arrangements developed in recent years, while for Iraqis and Yemenis access to lawful work is more closely intertwined with residency requirements and the related approvals. Gazans, for their part, have particular statuses and documents, including the white card and the temporary Jordanian passport, along with special arrangements relating to work permits.[25]

The effect of these differences appears in the field data. For Iraqis and Yemenis, residency, the fines resulting from it, and the related approvals emerged among the factors affecting the regularisation of their work. For Syrians, the type and validity of documents and the regulatory pathway available for obtaining a work permit stood out. For Gazans, experiences centred more on the nature of their documents, the absence of a national number, and the difficulties participants linked to accessing certain jobs, services, and economic transactions.[26]

These differences do not mean that nationality itself determines the outcome, but that each group has a different legal and documentary pathway that may open up or restrict certain options in the labor market.

2. Residency as a Factor in Access to Lawful Work

Residency is one of the most prominent points of difference between the groups. As the preceding legal chapter explained, residency requirements do not apply in the same way to all nationalities; while the situation of Iraqis and Yemenis is more clearly tied to residency, its renewal, and the fines resulting from failure to renew.[27]

The quantitative data reveal the scale of this issue within the sample: 83.3% of Iraqis and Yemenis reported accumulated residency fines, with up to 90.0% among Iraqis. Among Iraqis and Yemenis without a work permit, 55.1% cited residency fines as one of the reasons they had not obtained a permit.[28]

These results point to a clear overlap between the residency track and the work regularisation track for these two groups. This is consistent with the Ministry of Labor's explanation that, in cases requiring the approval of the Ministry of Interior, completing the work permit depends on that approval being received before the permit is issued.[29]

25. Al-Qbeilat, op. cit.; see also Section 3 of this study.
26. IRCKHF, [Focus Group Discussion Outputs: Study of Refugees in the Jordanian Labor Market], 2026.
27. Al-Qbeilat, op. cit.
28. IRCKHF, [Key Survey Findings: Study of Refugees in the Jordanian Labor Market], 2026, findings on residency fines and reasons for not obtaining a work permit, op. cit.
29. Research interview with Riyad Barham, Director of the Migrant Workers Directorate.

The issue is not limited to the procedural effect of residency. Overall, 40.6% of respondents reported avoiding government offices for fear of detention, being held responsible, or expulsion, up to 61.5% of Yemenis and 58.0% of Iraqis.[30] This data does not establish that residency fines are the direct cause of this fear. However, the high levels of both indicators in the same two groups, along with what was said in the focus group discussions, make the relationship between a stable legal status and willingness to deal with official institutions an issue worth analysing.

3. The Relationship Between UNHCR Registration, Residency, and Work

How UNHCR registration relates to residency and work emerged as one of the most confusing issues for Iraqi and Yemeni participants.

Participants in the focus group discussions described what they saw as a trade-off between keeping their status with the UNHCR and moving to another route involving residency and a work permit. Some recounted cases of people who believed that changing their legal status could lead to losing their registration or having their UNHCR file closed, with no guarantee of succeeding in obtaining a work permit.[31]

These accounts should be treated as participants' understanding and experience, not as established legal rules. The Director of the Migrant Workers Directorate at the Ministry of Labor explained that the Ministry does not link a work permit application directly to the person's UNHCR file, and that the UNHCR registration information is not visible to the Ministry when a permit application is submitted. According to his explanation, in cases subject to residency requirements, the procedure requires the approval of the Ministry of Interior. A person's status with the UNHCR is not a direct condition imposed by the Ministry of Labor for issuing the permit.[32]

This finding reveals an important gap between the procedure as the official authority explains it and the way some participants understand the relationship between registration, residency, and work. This gap may have a practical effect, even when the perception is not legally correct. The fear of losing protection status or assistance may lead some people not to attempt to follow the official route to work.

The lack of clear legal and procedural information is a finding of the study in its own right, not merely a marginal awareness-raising issue.

30. IRCKHF, [Key Survey Findings], findings on avoiding government offices for fear of detention, being held responsible, or expulsion.
31. IRCKHF, [Focus Group Discussion Outputs].
32. Interview with Riyad Barham, Jordanian Ministry of Labor.

4. Official Documents as a Practical Condition for Entering the Labor Market

The documents participants rely on differ according to nationality and legal status. The quantitative analysis shows that 96% of Syrian participants hold a Syrian identity card and 94% hold a UNHCR-issued document. Among Iraqi participants, 84% hold a foreign passport and 82% a UNHCR document, but no more than 8% hold a residence permit. Among Yemenis, all respondents reported holding a foreign passport, 65.4% a UNHCR document, and 26.9% a residence permit. Among Gazans, 76% hold a white card and 74% a temporary Jordanian passport.[33]

These figures should not be read as indicating that a particular document automatically leads to a particular outcome in the labor market. Instead, they show that the four groups rely on different combinations of documents and that these documents do not perform the same functions in residency, work permit, and other service procedures.

The focus group discussions support this finding. Syrian participants linked some difficulties to the validity of the security card or UNHCR documents, while among Iraqis and Yemenis, there was a clearer link between the passport, residency, and UNHCR status. Gazans' experiences centred on the white card, the temporary passport and the absence of a national number.[34]

Holding a document that proves identity or protection status does not, therefore, necessarily mean meeting all the requirements needed to enter the lawful work pathway.

5. Gazans and the Absence of a National Number

In the focus group discussions, the absence of a national number emerged as one of the most frequently recurring themes in the experiences of Gazan participants. Participants linked this situation to difficulties in accessing certain jobs, registering certain businesses and vehicles used for work, and using online services that depend on the national number.[35]

Participants also described cases of people who hold certificates or qualifications but have struggled to find work because of the type of documents they hold. One participant spoke of relying on a Jordanian partner to register a business or a work-related vehicle and the greater economic dependence on another party that this created.[36]

These testimonies alone do not support the claim that the absence of a national number legally bars all Gazans from these transactions, since requirements vary by type of transaction and competent authority. The study therefore treats them as practical barriers reported by participants, which merit separate verification for each service or procedure.

33. IRCKHF, [Qualitative and Quantitative Field Research Outputs], findings on type of documents by nationality.
34. IRCKHF, [Focus Group Discussion Outputs].
35. Ibid.
36. Ibid.

Even so, these experiences show that the challenges Gazans face do not stop at the work permit, but, in some cases, extend to their ability to use the documents available to them across a wider range of professional and economic transactions.

6. Legal Status and the Quality of Available Opportunities

The data point to a widespread sense within the sample of unequal access to the labor market: 90.1% of respondents said they do not feel they have equal opportunities to find work compared with Jordanians and 61.9% said that sectoral restrictions limit their ability to work in the profession that they are skilled in.[37]

Alone, these two figures do not prove that legal status is the direct cause of unequal opportunities or working outside of one's field. The nature of the labor market, the profession, qualifications, the employer, gender, and other factors may also affect the results. But reading them alongside the legal differences between the groups and the findings of the focus group discussions shows that legal and regulatory restrictions are one of the important factors in determining the range of available opportunities.

The qualitative groups revealed cases of people with university degrees or professional experience who are not working in their fields, as well as cases in which people said that their document type or legal status was among the reasons that limited their opportunities.[38]

For this reason, the study addresses occupational restrictions separately from the use of education and skills in Chapter 6, without assuming that a mismatch between qualification and work stems from a single legal cause.

7. The Gap Between Holding a Document and Utilizing Procedures

The findings also show that holding the required document does not on its own guarantee an easy move into the official route, because the usability of the system is affected by the clarity of information and procedures and by the ability to deal with online services.

About one third of respondents reported difficulty obtaining the documents required for some procedures, while 51.0% reported that they had not used government online platforms. Among those who had difficulty using them, unclear steps and technical problems were among the main barriers. In addition, 36.6% reported needing to rely on an intermediary or another person to complete government procedures.[39]

Using another person for a procedure does not always mean an unlawful intermediary practice; it may mean help from a relative, friend, or service provider. However, the high proportion shows that some participants are unable to complete government procedures alone.

37. IRCKHF, [Key Survey Findings], findings on equal employment opportunities and sectoral restrictions.
38. IRCKHF, [Focus Group Discussion Outputs], sections on education, experience, and occupational restrictions.
39. IRCKHF, [Key Survey Findings], findings on documents, government platforms and seeking help to complete procedures.

These findings show that access to lawful work is determined not only by the existence of a legal rule allowing it, but also by how accessible the administrative pathway is: the clarity of information, the ability to obtain documents, the ease of the online platforms, knowing which authority is responsible, and the direct and indirect cost of the procedure.

8. Summary

The study's findings show that legal status and official documents are an early and fundamental point on the path to the labor market, but their effect differs clearly between the four groups.

For Iraqis and Yemenis, work-related challenges are more closely intertwined with residency, fines, and the related approvals. Syrians benefit from more varied regulatory arrangements, while barriers linked to documents, permits, and the professions open to them persist. Gazans face particular challenges linked to the nature of their documents and the absence of a national number, alongside some official facilitations in the area of work permits.

The most important finding is that the gap lies not only between the presence and absence of a legal rule, but may also lie between a procedure existing officially and a person's ability to understand and use it. A pathway may be legally available, but complex requirements, multiple authorities, a lack of information, limited ability to use online systems, or the belief that the procedure carries legal risks may limit the practical benefit of it.

Legal status and documents are therefore not merely administrative requirements that come before work. They are part of the structure that determines how far a person can move into lawful work, settle in it and later use protective mechanisms. The next chapter turns to one of the most important components of this pathway: access to work permits and lawful work.

5. Access to Lawful Work and Work Permits

The main regulatory instrument that allows non-Jordanian workers to work lawfully under the Labor Law and the instructions and decisions issued under it is the work permit. Issuing a permit determines the occupations and activities that non-Jordanians are allowed to work in, the conditions and procedures set for each type of permit, and the status of the worker and employer.[40]

However, the existence of a legal pathway to a work permit does not mean that all the groups covered by the study are equally able to use it. The transition into lawful work is shaped by the intersection of several factors, including residency, documentation, the occupation or economic activity, cost, the type of permit, the worker's relationship with the employer, and knowledge of the proper procedures. The arrangements and facilitations available also differ markedly between Syrians, Iraqis, Yemenis, and Gazans.

40. Labor Law No. 8 of 1996, as amended, op. cit., Article 12; Jordanian Ministry of Labor, The Comprehensive Guide of Principles for Issuing Work Permits for Non-Jordanian Workers, op. cit.

The quantitative data show that few people in the sample held valid work permits: only 5.4% of all respondents reported having a valid work permit.[41] Given the nature of the sample, this figure cannot be used to estimate the proportion of permit holders among all refugees from the four groups in Jordan. However, it is a starting point for understanding the factors associated with not obtaining a permit within the sample studied.

1. Unequal Access to Work Permits

The four groups are not able not follow a single pathway to a work permit. For Syrian workers, government policies and procedures have developed a wider range of arrangements: the ordinary permit, the temporary permit, in cases covered by the relevant instructions and projects, and the flexible permit, which allows the worker to work for more than one employer within the occupations and professional group the permit covers.[42]

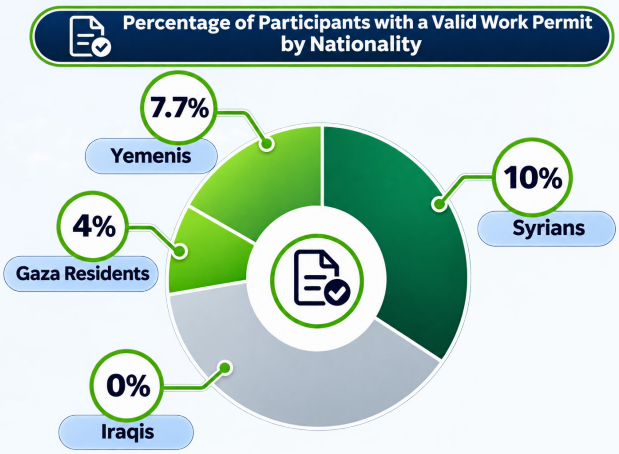
In the interview conducted for the study, the Director of the Migrant Workers at the Ministry of Labor confirmed the existence of the different types of permits. He explained that the temporary permit in a number of cases is linked to specific projects, including some cash-for-work projects, while the flexible permit gives wider scope in terms of employers within the occupational limits it covers.[43]

Iraqis and Yemenis, in contrast, have no pathway comparable to the flexible permit within the framework reviewed. Their access to a work permit depends more heavily on the general rules regarding the employment of non-Jordanian workers, along with residency requirements, the necessary approvals, the occupations and activities open to them, and the related fees.[44]

Gazans have different arrangements from both groups. As a rule, they need a work permit, but the Ministry of Labor's official guide exempts them from the work permit fee, the additional amount, and the revenue stamp fee, under the conditions it sets out, while the application review service fee is still charged. The Ministry of Labor has adopted the white card issued to Gazans in place of the temporary passport requirement for issuing work permits.[45]

The field data shows variations within the sample of those holding a valid permit: 10% among Syrians, 7.7% among Yemenis, and 4% among Gazans, while none of the Iraqi respondents in the sample reported holding a valid work permit.[46] These figures cannot be generalised to all members of the four groups, but they show differing levels of access within the sample and provide a basis for comparing the barriers faced by each group.

41. IRCKHF, [Key Survey Findings: Study of Refugees in the Jordanian Labor Market], op. cit.
42. Jordanian Ministry of Labor, The Comprehensive Guide of Principles for Issuing Work Permits for Non-Jordanian Workers, op. cit., section on workers of Syrian nationality; Jordanian Ministry of Labor, Instructions on the Conditions and Procedures for Employing Non-Jordanian Workers of Syrian Nationality of 2020, as amended, op. cit.
43. Research interview with Riyad Barham, Director of the Migrant Workers Directorate, Jordanian Ministry of Labor, op. cit.
44. Al-Qbeilat, op. cit.
45. Jordanian Ministry of Labor, The Comprehensive Guide of Principles for Issuing Work Permits for Non-Jordanian Workers, op. cit., section "Work Permits for Gazans"; Jordanian Ministry of Labor, "[Minister of Labor: To make things easier for Gazans, the white card will be accepted instead of the temporary passport for issuing work permits]", 23 January 2025, op. cit.
46. IRCKHF, [Qualitative and Quantitative Field Research Outputs: Study of Refugees in the Jordanian Labor Market], op. cit.



2. The Difference in the Cost of Permits and Following the Lawful Path

Cost was a main reason participants gave for not obtaining a work permit, but understanding this factor requires attention to the denominator of the percentage and the questions covered.

Among Syrians, Iraqis, and Yemenis who did not hold a work permit whose answers on this topic could be analysed, 67.5% cited the cost of the work permit as one of the reasons they had not obtained one. This factor was more prominent among Syrians and Iraqis.[47]

This finding is consistent with qualitative accounts where participants spoke of the difficulty of meeting the costs for regularising their work with their income. Some Syrians mentioned costs or sums they believed to be related to earlier periods or attempts to regularise their status.[48]

However, the way participants perceive "cost" does not necessarily correspond to the official work permit fee. This is especially clear among some Gazans who cited cost as a barrier, even though the official guide exempts them from work permit fees under the stated conditions.[49]

A distinction should be drawn between the work permit fee and the overall cost of entering the lawful pathway, which, depending on the case, may include the application review fee, documents, medical examinations, transportation, residency, professional licensing requirements, or other expenses. Some answers may reflect a lack of knowledge of the official structure of fees and costs.

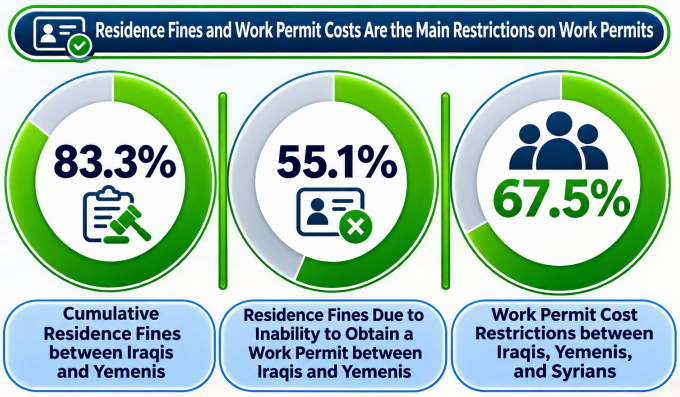
47. IRCKHF, [Key Survey Findings], op. cit.
48. IRCKHF, [Focus Group Discussion Outputs: Study of Refugees in the Jordanian Labor Market], op. cit.
49. Jordanian Ministry of Labor, The Comprehensive Guide of Principles for Issuing Work Permits for Non-Jordanian Workers, op. cit., section "Work Permits for Gazans".

3. Residency, Residency Fines, and their Relationship to Regularising Work

The effect of residency is clearest in the experience of Iraqis and Yemenis. The previous section showed that 83.3% of participants from these two groups reported accumulated residency fines, with up to 90% among Iraqis.[50]

Among Iraqis and Yemenis without a work permit, 55.1% cited residency fines as one of the reasons for not obtaining one.[51]

In the detailed analysis of reasons for not obtaining a permit by nationality, "residency fines" appeared among the reasons chosen by 21.5% of Iraqis and 22.1% of Yemenis.[52] These figures do not contradict the 55.1% cited above because they come from different denominators and methods of presentation. The first figure concerns Iraqis and Yemenis without a permit combined in an analysis of the effect of fines, while the latter two show the distribution of reasons within each nationality according to the question variable used in the analysis.



This pattern is consistent with the Ministry of Labor's explanation that, in cases requiring Ministry of Interior approval, completing a work permit depends on obtaining that approval before the permit is issued.[53]

These findings indicate that access to lawful work for Iraqis and Yemenis cannot be analysed through Ministry of Labor procedures alone, since the permit pathway intersects with residency status and approvals that are overseen outside of it.

50. IRCKHF, [Key Survey Findings], op. cit.
51. Ibid.
.IRCKHF, [Qualitative and Quantitative Field Research Outputs], op. cit .٥٢
53. Interview with Riyad Barham, op. cit.

4. Clarity and Knowledge of Procedures

The findings show that the challenge is not only concerning legal and financial conditions, but also participants' knowledge of the procedures. Only 36.6% of respondents said they had sufficient knowledge of the procedures for obtaining or renewing a work permit. Knowledge was particularly weak among the Iraqi population.[54]

This is consistent with the focus group discussions, which revealed differing understandings of the cost of the permit, the documents required, the relationship between residency and the work permit, the effect of UNHCR status, and the occupations open to them. The information participants were aware of differed even among members of the same group.[55]

This confusion was prominent among Gazans. Some participants believed that a work permit was not required for some forms of work, while others linked it to working for companies or to social security enrolment. Their estimates of its cost varied. In contrast, the official framework shows that work permits are necessary, but exemptions and facilitations mentioned apply.

This gap in knowledge indicates that clear legal and procedural information is part of the usability of the permit system itself. A formal procedure does not have its full effect if the target group is unaware of the conditions, cost, and the body responsible for it.

5. The Employer's Role in Access to a Permit

Some types of work permits are tied to a specific employer. 44.6% of respondents said that obtaining a work permit required the employer's approval, and of them, 37.8% said their employer had refused to obtain or renew the permit.[56]

The first figure should be read as **participants' perception of the procedure**, not as evidence that employer approval is a condition for every type of work permit. The flexible permit available to Syrians, for example, is designed to reduce dependence on a single employer, compared with the conventional permit tied to a specific establishment or employer.[57]

The findings show that making a worker's status dependent on the employer's cooperation can be a practical barrier when the employer refuses to obtain or renew the permit. The data does not, however, support the claim that such refusal necessarily leads workers to accept worse conditions. The finding is limited to this: an employer's refusal can stop the shift to regular work permit status or the continuation of the process.

54. IRCKHF, [Key Survey Findings], op. cit.
55. IRCKHF, [Focus Group Discussion Outputs], op. cit.
56. IRCKHF, [Key Survey Findings], op. cit.
57. Jordanian Ministry of Labor, The Comprehensive Guide of Principles for Issuing Work Permits for Non-Jordanian Workers, op. cit.; Interview with Riyad Barham, op. cit.

Flexible permits offer a relatively different model in this respect, because they give the worker room to move between employers within the occupations and professional group the permit covers. This flexibility does not, however, remove the other factors that affect use of the permit, including the occupations available, cost, knowledge of the procedures, and the nature of the labor market.

6. Syrians: A Varied Pathway with Barriers

Compared with the other groups covered by the study, Syrians have more variety in pathways to a work permit, notably through the availability of ordinary, temporary, and flexible permits.[58]

Even so, no more than 10% of Syrian participants in the sample reported holding a valid work permit. The detailed data also showed that the cost of the permit was the reason Syrians cited most often for not obtaining one, at 50.7% of the reasons this group gave, alongside other reasons such as employer refusal, a lack of information, and occupational restrictions.[59]

The focus group discussions revealed confusion among some participants over the names of permit types, including the use of the expression "free permit" to refer, at times, to different arrangements. The Ministry of Labor distinguished ordinary, temporary, and flexible permits.[60]

These findings indicate that a more varied regulatory pathway is not necessarily easy to navigate. Its practical effect still depends on the type of permit, its conditions, the occupation it covers, its cost, and the worker's knowledge of the procedures.

7. Iraqis and Yemenis: The Intersection of Residency, Cost, and Procedures

Iraqis and Yemenis do not benefit from the arrangements available to Syrians. They are subject to the general pathway for employing non-Jordanian workers, with its attendant requirements on residency, approvals, available occupations, and fees.

In the focus group discussions, some Iraqi and Yemeni participants described the work permit pathway as complicated or expensive, while some voiced concerns about the relationship between a change in their residency or work status and their status with the UNHCR. As explained previously, this is not a direct condition imposed by the Ministry of Labor, but it reveals a perception that may affect a person's decision about following legal procedures.[61]

In the quantitative sample, none of the Iraqi respondents reported holding a valid work permit, as opposed to 7.7% of Yemenis.[62] These figures cannot be generalised to all Iraqis and Yemenis in Jordan, but when considered with the findings on residency, fines, and knowledge of procedures, they point to clearly limited access to permits within the sample studied.

58. Jordanian Ministry of Labor, The Comprehensive Guide of Principles for Issuing Work Permits for Non-Jordanian Workers, op. cit., section on Syrian workers.
59. IRCKHF, [Qualitative and Quantitative Field Research Outputs], op. cit.
60. IRCKHF, [Focus Group Discussion Outputs], op. cit.; Interview with Riyad Barham, op. cit.
61. IRCKHF, [Focus Group Discussion Outputs], op. cit.; Interview with Riyad Barham, op. cit.
62. IRCKHF, [Qualitative and Quantitative Field Research Outputs], op. cit.

This underlines the importance of distinguishing between the legal possibility of obtaining a permit and the ability to use it in practice, given the financial, administrative, and legal conditions that surround it.

8. Gazans: A Gap Between Official Facilitations and Knowledge of Them

The situation of Gazans presents a different picture. The official framework establishes that they need a work permit, are exempted from a number of fees, and the white card has been adopted for the purpose of issuing permits in place of the temporary passport requirement.[63]

Nevertheless, the field data showed that a number of perceived barriers persist within this group. The group cited 18.2% the difficulty of permit procedures, 18.2% the employer's preference for informal arrangements, 12.1% restrictions relating to sectors or occupations, and 12.1% the cost of the work permit.[64]

Given the exemptions in place, the last figure should not be read as evidence of a high official fee. Participants' answers may reflect other costs associated with the procedure, a failure to distinguish between the permit fee and other expenses, or a lack of knowledge about the official pathway.

This case demonstrates that a legal facilitation does not necessarily have its full effect as soon as it is issued; its effect depends on accurate information reaching the intended beneficiaries and their ability to use the procedure.

9. From the Existence of a Legal Pathway to its Usability

When considered all together, the findings show that access to lawful work is not determined by a single legal rule, but shaped by the interaction of several factors. A work permit system is a basic condition for regulating the employment of non-Jordanian workers, but alone is not enough if residency requirements cannot be met, occupations are unavailable, procedures are unclear, the type of permit requires the employer's cooperation and that cooperation is not present, or the person does not know precisely which pathway or pathways apply to them.

These factors are different across the four groups. Syrians benefit from a wider choice of permit types, Iraqis and Yemenis have intersecting complications with residency, the work permit, and cost, and Gazans experience a gap in the knowledge to follow certain official facilitations and the facilitations themselves.

As a rule, working without a permit does not remove the labor rights from an employment relationship, as noted in the discussion of the legal framework. In practice, however, working outside the legal pathways may coincide with having no contract, weak job security, and a fear of inspection or dealing with institutions, issues that are addressed later in the study.

63. Jordanian Ministry of Labor, The Comprehensive Guide of Principles for Issuing Work Permits for Non-Jordanian Workers, op. cit.; Jordanian Ministry of Labor, "[Minister of Labor: To make things easier for Gazans…]", op. cit.
64. IRCKHF, [Qualitative and Quantitative Field Research Outputs], op. cit.

10. Summary

This study shows that the work permit is a key element in the move into lawful work, but how accessible, and usable it is, differs across the four groups.

Syrians benefit from a more varied structure of permit types, though barriers related to cost, occupation options, and knowledge of procedures persist. Iraqis and Yemenis face a greater intersection of residency, approvals, and the work permit. Gazans have official exemptions and facilitations that not all participants are equally aware of.

The findings also indicate that the low rate of permit holding within the sample cannot be attributed to a single cause or explained as mere unwillingness to regularise work. Instead, it is linked to the intersecting of legal, procedural, and financial conditions, the nature of the occupation, the type of permit, the employer's role, and the level of knowledge of procedures.

Accordingly, an assessment of the work permit system should not stop at the existence of the legal pathway or the number of permit types available; it should also cover how far that pathway is usable and accessible in practice to the groups it targets.

The work permit is, however, only one stage in access to decent work. Obtaining one does not necessarily guarantee that a person can work in their profession or utilizing their qualifications and experience. The next section analyses occupational restrictions and the extent to which education and skills are utilized.

6. Occupational Restrictions and the Use of Education and Skills

Access to the labor market is not limited to being able to obtain a work permit. It extends to the type of occupation a person can practise and the extent to which they can make use of their education, qualifications, and previous experience. A non-Jordanian worker may face restrictions on the occupations and activities open to them or additional licensing requirements to practise certain professions, alongside other labor market factors that may lead them to work in a field that does not match their qualifications.

The quantitative data shows that 29.7% of respondents said their current work did not match their skills. The figure rose to 46.2% among Yemenis, compared with 32% among both Syrians and Iraqis, and fell to 8% among Gazans.[65] These figures do not mean that occupational restrictions are the only cause of the discrepancy between skills and work. When considered with the data on occupations and the qualitative findings, however, they reveal a gap between the skills some participants have and the job opportunities they have access to.

65. IRCKHF, [Qualitative and Quantitative Field Research Outputs: Study of Refugees in the Jordanian Labor Market], op. cit.

1. Regulation of the Occupations and Activities Open to Non-Jordanians

The employment of non-Jordanian workers in Jordan is subject to regulation that specifies the occupations and activities in which work permits can be issued, alongside professions closed to non-Jordanian labor and conditions and ratios that vary by activity and occupation. The Ministry of Labor publishes a comprehensive guide to the criteria for issuing work permits to non-Jordanian workers and separately publishes the consolidated document of professions closed to non-Jordanian labor and the related subsequent decisions.[66]

This means that the possibility of working in a given occupation may be affected at more than one regulatory level: the occupation may be closed to non-Jordanians, it may be open within a specific activity or under specific conditions and ratios, or, in addition to a work permit, it may require meeting conditions set by another professional or regulatory body.

In the interview conducted for the study, the Director of the Migrant Workers Directorate at the Ministry of Labor explained that the Ministry cannot issue a permit for an occupation that the rules governing the employment of non-Jordanian workers do not allow and that some occupations for which a work permit can be considered remain subject to separate licensing requirements with the body that regulates the profession.[67]

When participants say that an occupation is "closed" to them, they may therefore mean, in some cases, an occupation formally closed to non-Jordanian labor and, in others, that they do not meet the conditions for issuing a permit another body's conditions or for practising the profession. Reading these accounts, therefore, requires checking the legal nature of the barrier in each case.

2. Occupational Restrictions Shown Through Quantitative Data

61.9% of all respondents said that sectoral restrictions limit their ability to work in the occupation that they are skilled in. The figure varied markedly between groups: 82% among Iraqis, 61.5% among Yemenis, 60% among Gazans, and 44% among Syrians.[68]



66. Jordanian Ministry of Labor, "[Occupations Closed to Non-Jordanian Workers]", consolidated amended document of Decision No. (58/2020) and subsequent decisions, Ministry of Labor website, last amended 6 September 2026; Jordanian Ministry of Labor, The Comprehensive Guide of Principles for Issuing Work Permits for Non-Jordanian Workers, op. cit.
67. Interview with Riyad Barham, Director of the Migrant Workers Directorate, Jordanian Ministry of Labor, op. cit.
68. IRCKHF, [Qualitative and Quantitative Field Research Outputs], op. cit.

These figures describe participants' experiences and assessments of the effect of the restrictions; they do not on their own prove that each case resulted directly from a legal decision about the occupation. Nevertheless, the differences between the groups are consistent with what the study has shown about differing legal and regulatory pathways and differing access to types of work permits.

90.1% of respondents also said they did not feel they had equal opportunities to find work compared to Jordanians.[69] This indicator reflects a widespread perception of unequal opportunities within the sample, but it does not on its own identify the reasons for that perception, which may involve occupational restrictions, the nature of the jobs available, legal status, employers' requirements, experience, and other factors.

The indicator of unequal opportunities should not be automatically linked with the indication of occupational restrictions like they are the same. The first concerns a broader perception of opportunities to access work, while the second specifically concerns the possibility of working in the occupation in which a person is skilled.

3. University Qualifications and Working Outside One's Field

The qualitative findings support what the quantitative data revealed about cases in which people with qualifications and experience work outside their fields.

In the focus group discussions with Syrians, there were cases of people with qualifications in engineering, pharmaceutical, media, and other fields who had been unable to continue in the same field. Some found unrelated work or turned to volunteering and working for specific organisations. One participant with a qualification in journalism and media with several diplomas spoke of working in fields outside of his original career path.[70]

In one case, a Syrian participant with a degree in civil engineering spoke of being unable to work in her field and turning to teaching, a job she felt did not match her level of qualification.[71]

Among Iraqi participants, there were cases involving medicine, engineering, pharmaceutical, and technical occupations, while the Yemeni experience included cases of people with specialist qualifications, including dentistry, who had been unable to practise their field.[72]

These cases do not prove that legal restrictions are the only reason qualified people move into unrelated work, because entry into a profession may also be affected by professional licensing, experience, employers' requirements, and the nature of labor market demand. They do, however, reveal that some of the skills and qualifications within the sample are not being used.

69. Ibid.
70. IRCKHF, [Focus Group Discussion Outputs: Study of Refugees in the Jordanian Labor Market], op. cit.
71. Ibid.
72. Ibid.

4. The Difference Between a Work Permit and a Licence to Practise

One of the most important explanatory findings from the Ministry of Labor interview is the need to distinguish between a work permit and a licence to practise a profession.

The fact that a work permit can be issued does not necessarily mean that a person can practise a regulated profession if that profession requires a licence or prior approval from another body. The Ministry official used the health sector as an example, explaining that practising a medical profession requires meeting the conditions of the body responsible for licensing practice before the Ministry of Labor can process the work permit application under the framework governing the employment of non-Jordanian workers.[73]

The same logic applies to other professions that fall under ministries, public bodies or professional associations. The sticking point may therefore lie at one or more of three levels:

1. Whether the occupation is open to non-Jordanians at all;
2. Whether a work permit can be issued for it;
3. Whether the licensing or practice conditions are met.

This distinction matters because it avoids attributing all the restrictions that participants face to the Ministry of Labor and helps identify which body should address the barrier in each case.

5. How the Effect of Restrictions Differs

The data shows that the effect of occupational restrictions, as participants perceive it, differs clearly across the four groups.

Syrians had the lowest proportion reporting that sectoral restrictions limit their ability to work in the occupation they are skilled in, at 44%. This can be read in light of the more varied work permit arrangements and pathways available to them without implying that restrictions on specialised professions have disappeared.[74]

At 82%, Iraqis had the highest proportion, which intersects with the qualitative testimonies relating to medicine, engineering, pharmaceutical, and technical occupations, along with what earlier sections showed about limited access to work permits within the Iraqi sample.[75]

Among Yemenis, the figure was 61.5% and the focus group discussions included cases of people who had been unable to practise in their original fields.

Among Gazans the figure was 60%, alongside other barriers participants reported relating to documentation, the national number, and the requirements of certain professions.[76]

73. Interview with Riyad Barham, op. cit.
74. IRCKHF, [Qualitative and Quantitative Field Research Outputs], op. cit.; Jordanian Ministry of Labor, The Comprehensive Guide of Principles for Issuing Work Permits for Non-Jordanian Workers, op. cit.
75. IRCKHF, [Qualitative and Quantitative Field Research Outputs], op. cit.; IRCKHF, [Focus Group Discussion Outputs], op. cit.
76. Ibid.

This variation does not mean that nationality in itself causes the restrictions. Instead, it reflects the different combination of residency, permit, occupational, and documentation rules and professional bodies' requirements that each group faces.

6. Occupational Restrictions Opposed to the Quality of Available Work

The qualitative findings indicate that some participants who were unable to work in their fields turned to daily-wage, service, or manual work, volunteering and working for organisations, or home-based projects and self-employment.[77]

However, before claiming that occupational restrictions lead directly to informal work in every case, consideration of other factors is needed. The available material points to the compounding of occupational restrictions and other factors, including the work permit, residency, cost, labor market demands, and the need for income.

Being unable to practise one's original profession may narrow the range of occupational alternatives open to some, and may push some to accept work that is unstable or disconnected to their qualifications, but it cannot be assumed that this path applies to all participants.

The importance of this finding is that a mismatch between skills and work may have effects that go beyond the job title itself, including pay, stability, and access to social protection, issues that the following sections examine separately.

7. Working Outside One's Field as a Response to Limited Alternatives

Field experience shows that some participants redirected their careers when they could not access their original fields. Some moved to another sector, to work that did not require the qualification they held, to volunteering, to temporary work, or to a small economic activity.

These shifts should not always be regarded as free career choices: some testimonies show that they occurred as a result of limited available alternatives. At the same time, the study does not measure the role of legal restrictions in these decisions against other labor market factors.

This is consistent with the quantitative finding that 29.7% of employed respondents in the sample said their work did not match their skills, with up to 46.2% among Yemenis.[78]

8. Graduates and Students in Jordan

The relationship between education and work is especially important for people who were educated or trained in Jordan, because they have already invested in gaining a qualification within the national education system.

77. IRCKHF, [Focus Group Discussion Outputs], op. cit.
78. IRCKHF, [Qualitative and Quantitative Field Research Outputs], op. cit.

The focus group discussions included cases of people who had studied or trained in Jordan, then had difficulty working in the field that they were qualified in.[79]

The study does not have sufficient quantitative data on the number of graduates of Jordanian educational institutions in the sample, or on the rates at which they moved into work in their fields, so no general conclusion can be drawn about educational outcomes and their relationship to refugee employment.

This qualitative finding is valuable as it raises a policy question: To what extent do the educational pathways open to non-Jordanians match the career pathways they can obtain?

Students who need to work while studying is addressed later in the study, in the section on the intersecting factors that affect access to decent work.

9. Balancing Labor Market Protection with the Use of Skills

The regulation of the employment of non-Jordanian workers rests on considerations of labor market needs and the protection of job opportunities for Jordanians. These are legitimate considerations at the core of national employment policy.

The study's findings point to cases in which people living in Jordan have qualifications or experience they cannot fully use. This study cannot determine which occupations should be opened or have their conditions amended, nor does it provide a supply-and-demand analysis sufficient to recommend lifting occupational restrictions or widening access to particular sectors.

However, the findings do support a targeted approach: periodic review of occupations and skills in line with labor market needs while maintaining priority for the employment of Jordanians and considering whether available skills can be used where there is a genuine need for them.

The findings also point to the importance of a clear division of responsibilities between the Ministry of Labor and the bodies that regulate the professions so that a person can tell whether the barrier concerns the possibility of issuing a work permit, the licence to practise the profession, or both.

10. Summary

The study shows that access to a job does not necessarily mean being able to make use of one's education, skills, and previous experience. Some participants reported a gap between their skills and the work they do and a large proportion of the sample considered that sectoral restrictions limit their ability to work in the occupation in which they are skilled.

79. IRCKHF, [Focus Group Discussion Outputs], op. cit.

This experience differs across the four groups. Iraqis had the highest rate of reporting an effect from occupational restrictions, followed by Yemenis and Gazans, while Syrians had the lowest rate in the sample. This variation does not mean that nationality in itself is the explanatory factor. Rather, it reflects the different legal, regulatory, documentation, and occupational pathways surrounding each group.

The study also shows that what a participant describes as being "barred from the profession" does not always stem from a single legal source. It may relate to a profession closed to non-Jordanian workers, to the rules for issuing work permits, or to the licensing conditions of a competent ministry, public body, or professional association.

Accordingly, assessing access to decent work is not limited to the ability to find work at all, but the extent to which education, experience, and skills can be used productively, within a balance that maintains priority for the employment of Jordanians and responds to labor market needs.

The next section covers the type of work available to actual working conditions and how close they are to the elements of decent work.

7. From Access to Work to Decent Work

It is not enough to assess the situation of the groups covered in this study by their ability to find any job or obtain a work permit, because access to work does not necessarily indicate access to decent work. According to the ILO, decent work rests on the availability of productive employment, respect for rights at work, social protection, and social dialogue under conditions that uphold dignity, security, and fairness.[80]

This study looks at the quality of work through a set of practical indicators: a clear contract, income level, regular payment of wages, working hours, social protection, occupational safety, health, job stability, and the ability for one's rights to be protected when a violation occurs.

The findings show gaps in several of these indicators within the sample. Work without a written contract was widespread, the income of a large share of participants was concentrated below 290 JOD a month, and there were high levels of reported long working hours, delayed and unpaid wages, and limited social security and health insurance coverage among those with written contracts.[81]

These findings do not mean that all participants work in conditions that are not acceptable, nor do they allow a composite index that classifies each job as "acceptable" or "unacceptable". They reveal specific aspects of working conditions that need to be considered alongside mere participation in the labor market or holding a permit.

80. International Labor Organization, "Decent Work and the 2030 Agenda for Sustainable Development," International Labor Organization. The ILO identifies the four pillars of decent work as employment creation, rights at work, social protection and social dialogue.
81. IRCKHF, [Key Survey Findings: Study of Refugees in the Jordanian Labor Market], op. cit.

1. The Absence of a Written Contract and Documentation of the Employment Relationship

A written contract is an important means of setting the terms of the employment relationship and documenting wages, working hours, rights, and obligations. However, in law, the lack of a written contract does not necessarily mean there is no employment relationship. Such a relationship can exist and be proven by other means under the provisions of the Labor Law.

The data shows that 80.2% of respondents said they work without a written contract, as opposed to 19.8% who reported having one. The share without a written contract was 96% of Iraqis, 84.6% of Yemenis, 74% of Syrians, and 66% of Gazans.[82]



These figures show that weak written documentation of the employment relationship is a pattern within the sample. It is most prominent among Iraqis and Yemenis, the groups that previous sections showed face greater difficulty in accessing work permits and legal pathways.

This does not confirm that difficulty obtaining a permit is a direct cause of the absence of a contract, but the fact that both indicators occur in the same two groups points to an association that deserves to be read together with the qualitative findings on daily and informal work.

A written contract matters most when a dispute arises: it makes it easier to prove elements such as the agreed wage, working hours, and the nature of the job. Legal rights within the employment relationship, in principle, remain in place even without a written document.

82. IRCKHF, [Key Survey Findings: Study of Refugees in the Jordanian Labor Market], op. cit.

2. No Guarantee that Working Conditions Match a Written Contract

Even where there is a written contract is, the actual working conditions may not match its terms. Of the respondents who said they had a written contract, 67.5% said that actual working conditions "always" match the contract, while 30% said they only "sometimes" match it.[83]

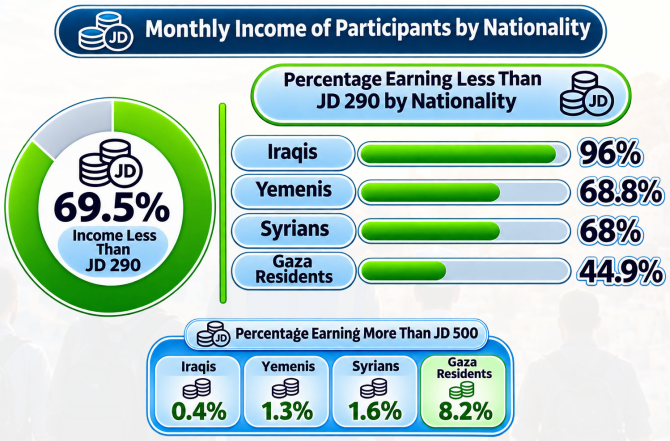
This finding is consistent with qualitative accounts, in which participants spoke of differences between what was agreed upon at the start of the job and what was later applied to wages, hours, deductions, and some working conditions.[84]

A contract is therefore an important element in regulating and documenting the relationship, but assessing the quality of work also requires looking at how far the agreed terms are applied and whether they can be claimed when a dispute arises.

3. Income Level

The data shows a clear concentration of income in the lower brackets within the sample: 69.5% of those who gave valid income data said their monthly income is below 290 JOD, while the share earning more than 500 JOD a month did not exceed 2%.[85]

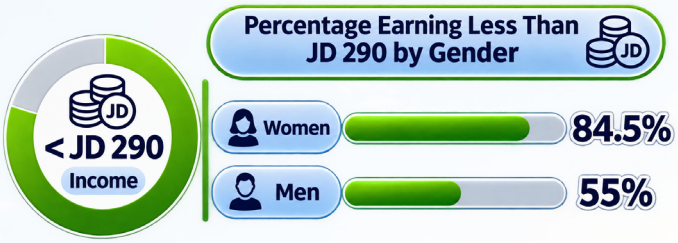
This result varied across the four groups. The share with an income below 290 JOD was 96% among Iraqis, 68.8% among Yemenis, 68% among Syrians, and 44.9% among Gazans. The share of Gazan participants earning more than 500 JOD was 8.2%, higher than the shares recorded for the other groups in the sample.[86]



83. Ibid.
84. IRCKHF, [Focus Group Discussion Outputs: Study of Refugees in the Jordanian Labor Market], op. cit.
85. IRCKHF, [Qualitative and Quantitative Field Research Outputs], op. cit.
86. Ibid.

These figures do not make it possible to identify the reasons for differences in income levels. The type of occupation, number of working hours, along with the person's sex, experience, size of the establishment, legal status, and other factors may all play a part. The study, therefore, does not attribute low income directly to legal status and instead treats it as one indicator of the quality of work, to be read alongside the other findings.

There is also a clear gap by sex: 84.5% of women had an income below 290 JOD, against 55% of men.[87] The quantitative data alone does not explain the reasons for this gap, but it supports the importance of analysing women's experiences separately, in light of the type of work available to them, caregiving responsibilities, and the qualitative findings on the working environment



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4. Working Hours and Overtime

55% of respondents said they worked more than eight hours a day.[88] Working more than eight hours a day should not in itself be taken as sufficient evidence of a legal violation, because assessing that requires knowing how working hours are organised, the number of weekly hours, whether the work was overtime, and how it was compensated.

The finding is meaningful when read with the qualitative testimonies, which, in some cases, described working days stretching to 12 or 15 hours, with accounts of no additional pay or limited rest breaks.[89]

These include a Syrian participant's account of his son working around 12 hours a day for a fixed monthly wage and an Iraqi participant's account of working days in sales that, by his account, ranged from 12 to 15 hours with no separate calculation for overtime.[90] These cases cannot be generalised to all participants, but the convergence of the quantitative finding with the qualitative accounts indicates that long working hours and the way overtime is organised are important elements when assessing working conditions within the sample.

5. Delayed and Unpaid Wages

The quality of a wage is not only a matter of its amount, but also of whether it is paid regularly. 49% of respondents said they experienced delays in the payment of wages, while 27.7%

87. Ibid.
88. IRCKHF, [Key Survey Findings], op. cit.
89. IRCKHF, [Focus Group Discussion Outputs], op. cit.
90. Ibid.

reported cases where their wages were not paid.[91] The focus group discussions produced accounts of delayed compensation or not receiving the full wage. Some described continuing to work regardless, because they needed the income or found it hard to find an alternative.[92]

The study does not claim that the absence of a contract or permit is the direct cause of delayed wages, but the lack of written documentation of the employment relationship may, in practice, make it harder to prove the amount of the wage, when it is due, and the terms of payment if a dispute arises.

6. Social Security

Social security is an element of social protection linked to employment risks and the insurance rights that the law grants to those it covers. Of the respondents who said they had a written contract, only 30% said they were covered by social security. The share was 38.5% among Syrian contract holders and 41.2% among Gazan contract holders, while the survey recorded no case of coverage among the Iraqi and Yemeni contract holders in the sample.[93]

The figures for each nationality should be treated with caution, because the denominator here is limited to written-contract holders within each group, a much smaller number than the total sample. These findings reflect the situation of the participants surveyed and do not allow coverage rates to be estimated for all workers in those groups.

The focus group discussions also produced accounts of the actual wage differing from the wage registered with social security, or of deductions that the worker believed were linked to social security without, by the worker's account, any corresponding registration covering the whole period of employment.[94]

These accounts indicate that assessing social protection is not limited to whether a worker is registered or not, but extends to the regularity of that registration, the accuracy of the registered data, and how far it matches the actual employment relationship.

7. Work-Related Health Insurance

Of the written-contract holders in the sample, only 15% said their job provides them with health insurance, as opposed to 85% who reported no such coverage through work.[95] This does not mean that those without health insurance from their employer lack other forms of health care or coverage, as the study did not measure all sources of health care available to the participants.

91. IRCKHF, [Key Survey Findings], op. cit.
92. IRCKHF, [Focus Group Discussion Outputs], op. cit.
93. IRCKHF, [Qualitative and Quantitative Field Research Outputs], op. cit.
94. IRCKHF, [Focus Group Discussion Outputs], op. cit.
95. IRCKHF, [Qualitative and Quantitative Field Research Outputs], op. cit.

8. Occupational Safety and Health

18.3% of respondents said they had been exposed to working conditions they considered unsafe.[96] The focus group discussions produced a number of accounts of work injuries and how they were handled. A Gazan participant spoke of her sister being injured at work and, by her account, being sent back to work before she had enough time to recover. There was also the case of a worker whose contractual relationship was disputed after his injury, even though the establishment covered some of the treatment costs.[97] One participant also described a Syrian worker whose employer, he said, required him to drop a complaint about a work injury in return for keeping his livelihood and being issued a permit.[98]

The study considers these cases as participant accounts, not facts established by a court. However, they show the importance of including work-related injuries in the contract, as well as social security registration and access to complaints and redress.

9. Leave and Job Stability

The focus group discussions produced accounts of irregularly receiving a weekly rest day or some kind of leave and of deductions from wages for absences in cases where participants believed they were entitled to leave.[99]

The data also shows different patterns of work, including daily-wage work and on-demand or piece-rate work, some of which were more common among women.[100]

Part-time, on-demand, or piece-rate work does not in itself mean that the work is unacceptable or unlawful, but depending on the terms of each case, these patterns may offer a different level of income stability and continuity compared to a regular employment relationship. As such, the study treats job stability as one element of the quality of work, not as a synonym for a particular type of contract.

10. The Relationship Between Legal Status and Working Conditions

The study reveals that a number of legal indicators and indicators of working conditions occur together, but the data does not make it possible to prove that legal status is the direct cause of every difference in wages, contracts, or social protections.

Iraqi and Yemeni participants expressed the belief that working without a permit or having unstable residency weakens their ability to negotiate with employers, refuse terms, or quit.[101]

96. IRCKHF, [Key Survey Findings], op. cit.
97. IRCKHF, [Focus Group Discussion Outputs], op. cit.
98. Ibid.
99. Ibid.
100. IRCKHF, [Key Survey Findings], op. cit.
101. IRCKHF, [Focus Group Discussion Outputs], op. cit.

In contrast, some Gazan participants described more regular experiences in registered companies, including a contract, social security registration, set hours, and payment of wages through bank transfer.[102]

These cases do not support the claim that nationality or the size of the establishment alone determine the quality of work. But they indicate that the degree to which the employment relationship is regulated may be an important factor, to be analysed alongside legal status, occupation, establishment size, type of contract, and other variables.

11. Working Conditions for Women

The data show differences between women and men on some work indicators, most notably income level, a higher share of women than men had an income below 290 JOD.[103]

The focus group discussions included accounts of limited occupational opportunities, caregiving responsibilities, and concerns about safety and harassment while searching for work.[104] The qualitative testimonies include cases of harassment and unwanted behavior that, by their own accounts, led some women participants to leave their jobs or turn down opportunities.[105]

These accounts cannot provide an estimate of how widespread harassment or other risks are among all refugee women, but do reveal an additional dimension of decent work that concerns not only wages and contracts, but also safety, dignity, and the ability to object or complain without suffering further harm. The study discusses these intersections more fully in Section 11.

12. Lawful work does not necessarily mean decent work

The findings show the need to distinguish between the lawful status of work and the quality of working conditions.

Holding a work permit regulates a non-Jordanian worker's entry into the labor market, while a written contract helps document the relationship, but neither alone is enough to show that all elements of decent work are present.

This is clear within the sample itself. Among written-contract holders, only 30% reported social security coverage and 15% reported health insurance through work, while 30% of contract holders said working conditions only match the contract sometimes.[106]

Conversely, not holding a work permit does not, in principle, extinguish the rights from the employment relationship, as discussed earlier in the legal framework and confirmed in the Ministry of Labor interview.[107]

102. Ibid.
103. IRCKHF, [Qualitative and Quantitative Field Research Outputs], op. cit.
104. IRCKHF, [Focus Group Discussion Outputs], op. cit.
105. Ibid.
106. IRCKHF, [Qualitative and Quantitative Field Research Outputs], op. cit.
107. Interview with Riyad Barham, Director of the Migrant Workers Directorate, Jordanian Ministry of Labor, op. cit.

Both levels should be distinguished: first, the lawfulness and regulation of work in terms of the permit, and second, the terms of the employment relationship and how much one's rights are respected within it. A worker may hold a permit, yet face problems with wages, hours, or social protection, and a worker may lack a permit yet still have rights under the law covered in the employment relationship.

13. Having Rights and Being Able to Exercise Them

The findings of this section show that the existence of legal rights does not necessarily mean they are followed to the same degree in every employment relationship. The ability to claim rights may be affected by various factors, including the absence of a written contract, the nature of the work, economic dependence on the employer or intermediary, legal status, and awareness of complaint mechanisms.

The study cannot determine the causal weight of each factor independently, but it shows that the quality of work cannot be measured by the legal text or the work permit alone. It also requires looking at actual working conditions and at how far protective mechanisms can be applied when a problem occurs. This leads directly into the later analysis of informal work, inspection, and access to complaints and justice.

14. Summary

The study's findings show that access to work is only the first stage in a broader path concerning the quality of work and the protection attached to it.

Within the sample, 80.2% reported working without a written contract; the income of 69.5% of those who gave data was concentrated below 290 JOD a month, 55% reported working more than eight hours a day, 49% reported delayed wages, 27.7% withholding of wages, and 18.3% unsafe working conditions.[108]

These indicators do not mean that all participants work in the same conditions, nor that each indicator on its own amounts to a legal violation. They reveal a set of gaps in working conditions that call for access to the labor market to be measured in terms of the quality of work and protection, not only participation or holding a permit.

Differences also appear within the sample by nationality, sex, and work experience, so interpreting them requires caution about attributing them to a single factor. The relationship between legal status, contracts, income, and social protection intersect with occupation, the employer, establishment size, sex, and additional factors.

The central finding of this section is that access to legal work does not automatically guarantee access to decent work. Permits and contracts are important elements in regulating the employment relationship, but decent work also requires actual conditions that safeguard rights, protection, and safety, and allow redress to be claimed.

108. IRCKHF, [Key Survey Findings], op. cit.

The next section turns to cases in which the employment relationship takes place outside the more formal frameworks, the role of intermediaries, and some forms of exploitation that emerged from the fieldwork.

8. Informal Work, Exploitation, and Intermediaries

The study's findings show that a number of participants work under arrangements that fall outside the more formal pathways of the labor market for various reasons, potentially because they lack a work permit, the employment relationship is poorly documented, they rely on daily and temporary work, they turn to intermediaries, or they carry out economic activities that are hard to register independently.

These patterns do not appear in the same way across the four groups. They emerged to differing degrees among Syrians, Iraqis, and Yemenis, while Gazans seemed to consistently take forms more closely tied to daily work, small establishments, and some activities that participants reported were hard to register independently.

Not every job without a written contract, and not all daily-wage work or work through an intermediary should automatically be regarded as "informal work" in the legal sense. However, the convergence of these patterns with limited possession of work permits, weak social protection, and some accounts relating to wages, documents, and threats, reveal employment relationships that may be less stable or weaker in terms of the worker's ability to ask for or claim their rights.

1. Forms of Work Outside the Formal Pathway

The work arrangements found in the study took many forms, including work without a permit or a written contract, daily, temporary, or on-demand work, and work through intermediaries or labor contractors, as well as home-based work and some small self-employed activities.

80.2% of respondents said they work without a written contract; the share was 96% of Iraqis, 84.6% of Yemenis, 74% of Syrians, and 66% of Gazans.[109]

These figures do not mean that all of these cases fall outside the formal economy: as noted above, a lawful employment relationship can exist even without a written contract. But weak documentation with limited possession of work permits and some patterns of temporary and daily work, indicates that a significant part of the sample's working relationships lack some of the practical safeguards that come with regulated and documented relationships.

The focus group discussions show that some participants turned to these arrangements after finding it difficult to access lawful work or to meet residency, permit, and occupation requirements, while others described cases in which the employer preferred not to go through the process of issuing a permit or documenting the relationship.[110]

109. IRCKHF, [Key Survey Findings: Study of Refugees in the Jordanian Labor Market], op. cit.
110. IRCKHF, [Focus Group Discussion Outputs: Study of Refugees in the Jordanian Labor Market], op. cit.

2. Dependence on the Employer and Unequal Bargaining Power

The qualitative accounts show that some participants working without a permit or written contract, or with unstable residency, felt that their ability to refuse working conditions, leave the job, or file a complaint was limited.[111]

This feeling was more pronounced in some of the Iraqi and Yemeni groups, where participants linked their legal status to their dependence on the employer or intermediary. There were also accounts of threats to report workers or call the police when they tried to leave the job.[112]

These testimonies do not prove that every irregular employment relationship is exploitative or indicate that all employers will use a worker's legal status as leverage. They demonstrate that weak legal and contractual stability can, in some cases, limit a worker's bargaining power and increase their dependence on whoever gives them the opportunity to work.

3. Intermediaries and Labor Contractors

The role of intermediaries was particularly prominent in the experiences of some Iraqi and Yemeni participants, especially in hospitality, cleaning, and events related occupations.

The focus group discussions showed that an intermediary may arrange the job, transportation, handing over all or part of the wage, and in some cases, becomes the party the worker depends on in practice to get the job and be paid.[113]

Among the accounts given, an Iraqi participant described an intermediary who employed male and female workers at events and paid each of them 12 JOD out of the 40 JOD that, the participant said, had been agreed upon with the event hosts, with deductions for transportation and tips. Participants also spoke of women and people under eighteen being used in some of thesearrangements.[114]

In another case, a Yemeni participant described her sister's experience of getting a cleaning job through an intermediary company and said the company deducted 150 JOD, leaving the worker with a monthly salary of 300 JOD.[115]

Intermediation or subcontracting is not in itself an unlawful practice. The legal assessment depends on the nature of the activity, licensing where it is required, the transparency of the relationship, mutual obligations, and how much labor rights are respected, but a lack of clarity about the wage, the rate of deductions, and who is responsible for the relationship with the worker can make intermediation an additional source of imbalance or exploitation.

111. Ibid.
112. Ibid.
113. Ibid.
114. Ibid.
115. Ibid.

4. Entitlements and Deductions from Wages

The focus group discussions produced accounts of deductions from wages or work-related payments, including deduction of part of the wage, amounts linked to transport and tips, or charging the worker costs that were not made clear at the beginning of the relationship.[116]

A Syrian participant described getting a job through an advertisement and then discovering, by her account, that half of her salary was being deducted for the recruitment office, which led her to leave the job after three months.[117]

Participants also described cases in which, they said, the employer paid fines or fees and then took them from the worker by deducting them from wages. The Ministry of Labor official explained in the interview that the Ministry hears of practices of this kind, but that assessing each case requires information or a complaint and verifiable evidence.[118]

The study therefore does not assume that every deduction is unlawful simply because it appears in a participant's account, but highlights the importance of transparency in setting wages, deductions, and responsibilities from the beginning of the relationship.

5. Delayed and Unpaid Wages

49% of respondents said they had experienced delays in the payment of wages, while 27.7% reported cases in which their wages were not paid.[119] Accounts of delayed entitlements or not receiving the full wage recurred in the focus group discussions and were especially evident in the experiences of certain Iraqis and Yemenis.[120]

The data does not confirm that working outside the lawful pathway is the direct cause in these cases, but weak documentation of the relationship or multiple parties standing between the worker, the employer, and the intermediary may make it more difficult to determine the amount of the wage, who is responsible for paying it, and when it is due if a dispute occurs.

6. Document Retention and Threats Using Legal Status

The focus group discussions produced some accounts that go beyond the usual disputes over wages or contracts and point to more serious forms of pressure on workers.

These accounts included some employers or other parties keeping a worker's passport or official documents and threats of calling the police or of reporting the worker's status when the worker tried to leave the job, appearing particularly among some Yemeni participants.[121]

116. Ibid.
117. Ibid.
118. Interview with Riyad Barham, Director of the Migrant Workers Directorate, Jordanian Ministry of Labor, op. cit.
119. IRCKHF, [Key Survey Findings], op. cit.
120. IRCKHF, [Focus Group Discussion Outputs], op. cit.
121. Ibid.

These practices become more significant when combined with the withholding of wages, restrictions on the worker's ability to leave the job, or the worker's almost complete dependence on the employer or intermediary.

The field material does not allow these cases to be automatically classified as trafficking in persons or forced labor, since that requires legal and investigative examination of the elements of each case. However, these facts overlap with indicators that warrant screening for possible severe exploitation and call for the cases not to be treated as mere work permit or residency violations before the possibility of a more serious risk has been ruled out.[122]

7. Home-Based Projects and Self-Employment

Adapting to limited opportunities for lawful work was not confined to working for employers. Some participants turned to home-based activities or small self-employed projects.

Iraqi women participants spoke of preparing food at home as a source of income. They reported difficulties relating to licensing, relations between tenant and landlord, complaints from neighbours, and fear of the activity being reported.[123]

A Gazan participant spoke of a home-based candle-making project, while another participant described relying on a Jordanian partner for some procedures relating to an economic activity and a vehicle he uses for work, which he linked to his not having a national number.[124]

These accounts are not enough to determine the legal rules governing each activity, so the study treats them as practical experiences, showing that self-employment is not always an independent pathway free of restrictions and may remain tied to licensing, registration, documents, and a reliance on another party.

8. Volunteering as an Alternative Pathway

Among the Syrian groups, there were cases of people with university qualifications who turned to volunteering or working with organisations after being unable to continue in their fields or low-paying, unstable jobs.

One account concerned two pharmaceutical graduates who initially worked for low wages without a permit or a clear contract, then changed to volunteer work with international or regional organisations.[125]

Volunteering cannot in itself be regarded as a form of exploitation, but its emergence as a recurring alternative for some qualified people may reflect the limited options available for turning qualifications and experience into stable, paid work.

122. Human Trafficking Prevention Act No. 9 of 2009, as amended, op. cit.; Jordanian Ministry of Justice, [National Strategy for Combating Human Trafficking 2024–2027], op. cit.
123. IRCKHF, [Focus Group Discussion Outputs], op. cit.
124. Ibid.
125. Ibid.

9. Differences in Patterns of Work Between Groups

Less formal work arrangements do not appear in the same way across all groups.

The role of intermediaries and contractors was more prominent in some Iraqi and Yemeni experiences, especially in events and cleaning work. Among Syrians, there were cases of work without a permit, temporary work, volunteering, and home-based projects. Among Gazans, there were more accounts of daily-wage work or work in small establishments and personal economic activities that participants found difficult to register or run independently because of the type of documents they hold.[126]

The evidence does not allow the prevalence of each pattern across all members of a group to be determined, so the study uses this comparison to understand how the forms of experience differ, not to rank the groups by the extent of informal work.

10. Additional Risks for Women in Less Formal Employment Relationships

The qualitative findings show that some women faced additional risks while looking for work or at work, including sexual and other types of harassment and unwanted behavior, along with limited occupational choices, the need for income and caregiving responsibilities.[127] Women participants spoke of cases that led them to leave a job or turn down a particular opportunity because of the employer's behavior or not feeling safe.[128]

These accounts do not provide an estimate of how widespread these practices are among refugee women. Instead, they show that weak documentation of the relationship or limited economic alternatives may make it harder to refuse or complain upon occasion.

11. Indicators of Severe Exploitation and Trafficking

Some accounts reveal a set of facts that call for closer attention, including document retention, threats to report workers or call the police, withholding of wages, some forms of control over access to work or wages through the intermediary, and cases in which participants described difficulty in leaving the relationship freely.

These elements, individually or together, do not amount to a final finding that a human trafficking offence has been committed. Legal characterisation requires examining the elements of act, means, and exploitative purpose under the Human Trafficking Prevention Act and the facts of each case.

What the study can establish is that some accounts contained indicators that call for screening and referral, and that treating the worker first as someone in breach of residency or permit rules may be inadequate if the facts could indicate more serious exploitation.

126. Ibid.
127. Ibid.
128. Ibid.

This underlines the importance of labor inspectors and the competent authorities being able to recognise the indicators that prove a case's need to be referred to the appropriate protection and investigation mechanisms.

12. The Ministry of Labor's Position and Follow-Up Mechanisms

The Ministry of Labor official explained that follow-up on cases involving intermediaries, deductions, and informal practices depend on the information or complaints the Ministry receives, inspection tools, and determining precisely how widespread these practices are all requires data from the parties responsible for inspection.[129]

This account reveals an important paradox in the study's findings: the official body needs a complaint or information in order to follow up, while the field data shows that some of the people who may most need protection are the most reluctant to approach official bodies because of their legal status or fear of consequences. This paradox leads directly into the analysis of inspection and complaints in the following sections.

13. Work Outside the Legal Pathway: A Short-Term Response with Lasting Risks

The qualitative findings indicate that some participants turned to less formal work arrangements because they provided a source of income when the lawful pathways were difficult, slow, or costly for them.[130]

However, these arrangements may come with less documentation of the relationship, weak social protection, unclear responsibility between the worker, the employer, and the intermediary, and greater risks when wages are delayed, an injury occurs, or a dispute arises.

Working outside the lawful pathway does not inevitably leads to exploitation, as violations can also occur within lawful employment relationships. However, the findings indicate that weak regulation and documentation may make it harder to protect one's rights when issues arise.

The phenomenon has two parallel dimensions: it may be a practical response to the need for income and, at the same time, it may reduce the worker's ability to use the protection tools available to them.

14. Summary

The study shows that a number of participants work under arrangements with less regulation or documentation and that the reasons cannot be reduced to individual choice or a willful breach of labor market rules.

129. Interview with Riyad Barham, op. cit.
130. IRCKHF, [Focus Group Discussion Outputs], op. cit.

According to the available accounts, these experiences were linked to difficulty accessing work permits, residency, occupational restrictions, cost, limited alternatives, employers' choices, and the nature of the sectors in which participants work.

The nature of these arrangements differs between groups. Intermediaries and deductions were prominent in some Iraqi and Yemeni experiences. Among Syrians, there were forms of work without a permit, volunteering, and home-based work. Some Gazan experiences were linked to daily work, small establishments, and difficulty running certain economic activities independently.

Some accounts reveal more serious indicators, such as document retention, threats using legal status, withholding of wages, and control over access to work or wages. The study does not allow these cases to be classified as trafficking offences, but it underlines the need for the competent authorities to have mechanisms capable of recognising indicators of severe exploitation, screening them, and referring them to the appropriate pathway.

The main finding is that work outside the more formal pathway may provide a source of income in the short term, but may come with less protection, documentation, and stability. This becomes more significant when the worker's situation is combined with fear of inspection, detention, or other consequences, which the next section addresses.

9. Inspection, Enforcement, and Fear of the Authorities

The field research shows that inspection and enforcement are a highly sensitive point in the experience of many participants in the labor market. In legal and institutional terms, labor inspection is a tool for verifying compliance with the provisions of the Labor Law, including the regulation of the employment of non-Jordanian workers, working conditions, wages, occupational safety and health, and other obligations within the Ministry of Labor's remit.[131]

The field experience, however, reveals a more complex picture. Some participants associated a visit from the inspection authority with fear of their work without a permit being discovered, measures linked to their residency status, or losing their job. This fear was most clear in some Iraqi and Yemeni accounts, then in Syrian accounts and, to a lesser extent, among Gazans.[132]

Analysing the effect of inspection requires a distinction between the legal powers of the inspecting body and the workers perception of the procedure and expected consequences.

131. Jordanian Ministry of Labor, [Inspection Guide for Employers], Jordanian Ministry of Labor website; Instructions on the Conditions, Qualifications and Technical Classification of Ministry of Labor Inspectors of 2021.
132. IRCKHF, [Focus Group Discussion Outputs: Study of Refugees in the Jordanian Labor Market], op. cit.

1. Labor Inspection: Between Detecting Violations and Protecting Rights

The Director of the Migrant Workers Directorate at the Ministry of Labor explained that inspection is not limited to detecting work without a permit. It extends to applying the provisions of the Labor Law on working conditions, wages, the work environment, and other rights and obligations.[133]

This is consistent with the Ministry of Labor's stated institutional framework, which presents inspection as a mechanism for ensuring compliance with the Labor Law, occupational safety and health requirements, alongside receiving and following up labor complaints.[134]

This clarification matters, since a number of focus group participants linked inspection primarily to the question of work permits or residency, whereas its institutional function is broader.

The difference reveals a gap in how the function of inspection is perceived. While the institution frames inspection as a tool of enforcement and protection, some workers who work without a permit or whose legal status is insecure, may perceive it as a source of potential risk.

2. Routine Inspection and Joint Campaigns

The Ministry of Labor interview helped distinguish between two situations that should not be confused.

The first is the routine inspection visit carried out by a Ministry of Labor inspector. According to the official's explanation, the inspector records the violation and takes the measures within his powers, but as a labor inspector, he has no power to hold the worker in custody or transfer themhimself.[135]

The second is joint campaigns, in which other bodies take part alongside the Ministry of Labor, including security agencies, in some cases. A worker caught in this context may face measures that do not all fall within the labor inspector's powers, but instead relate to the remit of the other bodies and the worker's legal status.[136]

This distinction is essential for understanding participants' accounts where the terms "inspection," "detention," and "expulsion" were used as if they were linked. From the worker's point of view, a campaign may look like a single procedure, while in reality, the legal powers are divided among more than one body.

133. Interview with Riyad Barham, Director of the Migrant Workers Directorate, Jordanian Ministry of Labor, op. cit.
134. Jordanian Ministry of Labor, [Inspection Guide for Employers], op. cit.
135. Ministry Interview with Riyad Barham, op. cit.
136. Ibid.

3. Fear of Inspection

Fear of inspection was brought up repeatedly in the focus groups, particularly among Iraqis andYemenis.[137]

Some Iraqi participants spoke of changing jobs or moving between different jobs out of the fear of being caught, while Yemeni participants gave accounts of trying to run away from the workplace when inspectors arrived.[138]

In one case, a Yemeni participant said that her husband was injured while trying to run away when labor inspectors arrived. She also mentioned another incident in which a person was involved in a traffic accident in similar circumstances.[139]

This study treats these cases as participants' accounts, not as facts established administratively or judicially. They show, however, that anticipated fear of enforcement can affect some workers' behavior and create risks unrelated to the original purpose of the inspection visit.

4. Detention Shown in Quantitative Data

The quantitative data reflect some of the experiences linked to detention or custody. Among the cases attributed to not having a valid work permit, Yemenis accounted for 50%, Iraqis 34.6%, Syrians 11.5%, and Gazans 3.8%.[140]

Among the cases attributed to not having valid residency, Iraqis accounted for 64.7%, Yemenis 23.5%,andSyrians5.9%.[141]

These percentages should be read with caution. They do not represent the proportion of each nationality in the sample who were detained, but a distribution within the cases in which the relevant reason was given, according to the method of data analysis used in the study. On their own, they cannot be used to estimate the "risk of detention" for each group. Nonetheless, they help explain the differing nature of the fears that emerged in the qualitative data. Residency features more prominently in the Iraqi cases, while the lack of a work permit appears more clearly in the Yemeni cases.

5. Inspection and Job Stability

The effect of fear of inspection does not appear only in the possibility of detention. It also appeared in some participants' sense that their employment relationship was unstable.

137. IRCKHF, [Focus Group Discussion Outputs], op. cit.
138. Ibid.
139. Ibid.
140. IRCKHF, [Qualitative and Quantitative Field Research Outputs: Study of Refugees in the Jordanian Labor Market], op. cit.
141. Ibid.

A Syrian participant described an incident in which an inspection team arrived at his workplace and took his ID and that of another worker. A violation was then recorded against the employer, according to his account. Although the incident did not end with him being taken into custody, he linked it to his feeling that an inspection visit can threaten the continuation of the job and put both worker and employer under pressure.[142]

This case is not enough to show that inspections generally lead to job insecurity. It does show, however, that expectations about inspections can affect a worker's sense of security in the job even when no harsher measures are taken against them.

6. The Difference Between Deportation and Removal

The focus groups showed participants using the terms "detention," "deportation," and "removal" interchangeably, whereas these measures differ in their legal basis and in the competent authority.

Under the Labor Law, the Minister of Labor may issue a decision to deport a non-Jordanian worker in the cases the law specifies, relating to breaches of the rules on the employment of non-Jordanian workers. The competent authorities then carry out the enforcement procedures.[143]

Removal, by contrast, is linked to the powers of the Ministry of Interior under the Residence and Foreigners' Affairs Law and legal framework governing the legal status of foreigners.[144]

The Ministry of Labor official confirmed this institutional distinction in the interview, explaining that a deportation decision issued within the Ministry of Labor's remit differs from a removal decision, which falls within the Ministry of Interior's remit.[145]

This distinction does not mean that all cases follow the same course or that enforcement takes place without regard to the person's individual situation, nor does it mean that every deportation or removal of a refugee automatically violates the principle of non-refoulement. Instead, a protection issue may arise when law enforcement chooses to return a person to a place where they face a risk prohibited by law, which requires an individual assessment of the destination and the relevant risks.

7. Fear of Dealing with Official Institutions

The fear that emerged in the study is not limited to inspections in the workplace. 40.6% of respondents reported that they avoid going to government offices for fear of detention or being held to account or expulsion, with up to 61.5% of Yemenis and 58% of Iraqis.[146]

142. IRCKHF, [Focus Group Discussion Outputs], op. cit.
143. Labor Law No. 8 of 1996, as amended, op. cit., Article 12.
144. Residence and Foreigners' Affairs Law No. 24 of 1973, as amended, op. cit.
145. Interview with Riyad Barham, op. cit.
146. IRCKHF, [Key Survey Findings: Study of Refugees in the Jordanian Labor Market], op. cit.

This finding intersects with the higher incidence of residency problems, fines, and the limited access to work permits among these two groups. The data does not confirm a singular factor as the reason for avoiding official institutions.

More specifically, the findings reveal that instability in some elements of legal status coincides with a high level of fear of dealing with institutions; a pattern found in focus group testimonies.

8. The Effect of Fear on the Use of Protective Mechanisms

This finding gains its significance when considered alongside the fact that the Ministry of Labor provides labor complaint mechanisms and that a work permit is not an exclusive condition for claiming one's rights in an employment relationship.

The Ministry of Labor's Inspection Services Guide indicates that complaints can be received through several channels. It lists a non-Jordanian's work permit, "if any," among the documents relating to the complaint, not as an absolute condition for submitting it.[147]

The ministry official also confirmed in the study interview that a worker who works without a permit does not, in principle, lose the right to claim their labor rights.[148]

This reveals a gap between the formal availability of protection and the practical willingness to use it. A worker who believes that contacting the institution may expose their legal status may hesitate to use the very channel that is meant to protect them.

9. Differing Experiences Across groups

The field experience shows differences between the four groups in the nature of their fears about inspection and enforcement.

Syrian participants mentioned fears linked to working without a permit and inspection campaigns, despite having more varied permit pathways than the other groups.

Among Iraqis, the overlap between work-related fears and residency status stood out more clearly, while Yemenis more frequently gave accounts of fear of being caught for working without a permit and attempts to avoid inspection.[149]

Among Gazans, there were cases linked to working without a permit, but the focus groups showed that some participants had relatively greater confidence in being able to turn to the Ministry of Labor or the courts, particularly those working in formal establishments.[150]

147. Jordanian Ministry of Labor, [Inspection Services Guide: Individual Labor Complaints], Jordanian Ministry of Labor website.
148. Interview with Riyad Barham, op. cit.
149. IRCKHF, [Focus Group Discussion Outputs], op. cit.
150. Ibid.

These accounts do not rank the groups in general terms such as "trust" or "fear," they illustrate the different nature of experience within the sample.

10. Multiple Authorities and Unclear Enforcement Procedures

The findings show that the number of bodies involved in regulating work, residency, and enforcement may contribute to workers' lack of clarity about procedures.

In a joint campaign, labor inspectors and staff from security agencies may be present in the same place, even though each body has different legal powers. As a result of their experiences, workers may be unable to tell which body recorded the violation, which made a subsequent decision, and which is carrying out the enforcement.

This confusion is also evident in the overlapping use in the focus groups of the terms "detention," "expulsion," "deportation," and "removal".

Clarity in the division of competences is therefore not merely an internal administrative matter. It also affects how workers understand the risks of dealing with official bodies.

11. Inspection as a Potential Point for Detecting Violations

Although some participants see inspection as a source of risk, its role is not limited to detecting work permit violations. It also includes protecting workers' rights and detecting violations in theworkenvironment.[151]

Depending on the nature and remit of the visit, an inspection can uncover violations relating to wages, occupational safety and health, working conditions, the employment of minors in unlawful conditions, and other violations within the scope of the Labor Law.[152]

Indicators requiring further verification may emerge during an inspection, such as document retention, threats, unexplained deductions, or conditions that may point to severe exploitation.

The challenge, therefore, is not to reduce inspection, but to strengthen its ability to combine the enforcement of labor market rules with identifying protection needs when there are indicators of serious violations or exploitation.

12. The Gap Between the Aim of Enforcement and its Perceived Effect

The study's findings reveal a gap between the institutional aim of enforcement and the effect that some participants perceive.

151. Jordanian Ministry of Labor, [Inspection Guide for Employers], op. cit.; Interview with Riyad Barham, op. cit.
152. Instructions on the Conditions, Qualifications and Technical Classification of Ministry of Labor Inspectors of 2021, op. cit.; Jordanian Ministry of Labor, [Inspection Guidance Manuals], op. cit.

The aim of regulating the employment of non-Jordanian workers is to enforce compliance with labor market rules, while inspection is one part of the system of implementing the Labor Law. Yet, the fear that emerged in some experiences was demonstrated through behaviors such as avoiding institutions, changing jobs, trying to run away when an inspection campaign arrived, or hesitating to file a complaint.[153]

This does not mean that enforcement should be relaxed or that regulatory violations should be ignored, instead, it points to the importance of the functions and procedures of each body being clear, so workers are able to distinguish between the track of handling a violation and the channels available for protecting rights and reporting violations. This matters especially where the incident itself may involve indicators of severe exploitation, since the worker's fear of the official body may leave the violation beyond the reach of any follow-up.

13. Summary

The study shows that inspection and enforcement play a dual role in participants' experiences. Institutionally, inspection is a tool for implementing the Labor Law, detecting violations, and uncovering breaches of working conditions, but some participants, particularly those working without a permit or with insecure residency, see it as a source of potential risk.

The findings also show that a lack of clarity about the difference between routine inspection and joint campaigns, between deportation and removal, and between the Ministry of Labor's remit and that of other bodies, adds to the confusion among some participants.

The effectiveness of inspection is measured not only by its ability to detect violations but also to perform its protective function and uncover violations without fear of the procedure driving workers to hide the problem or avoid protective mechanisms.

One of the central findings is a gap between the formal availability of protection and some workers' willingness to access it. This finding leads directly into the next section, which examines the extent to which complaint mechanisms are used and workers gain access to justice when violations occur.

10. Labor Violations and Access to Justice

The study's findings reveal a clear gap between the problems and violations participants reported in their employment relationships and their actual use of complaint and redress mechanisms. The data showed high levels of reported long working hours, delayed or unpaid wages, and working conditions participants considered unsafe, together with qualitative accounts of deductions, threats, harassment, and other practices that may amount to rights violations, depending on the circumstances of each case.[154]

153. IRCKHF, [Focus Group Discussion Outputs], op. cit.; IRCKHF, [Key Survey Findings], op. cit.
154. IRCKHF, [Key Survey Findings: Study of Refugees in the Jordanian Labor Market], op. cit.; IRCKHF, [Focus Group Discussion Outputs: Study of Refugees in the Jordanian Labor Market], op. cit.

In contrast, the proportion of respondents who said they had ever reported a labor violation did not exceed 7.4%.[155] This gap raises a question that goes beyond whether rights or complaint channels exist to how far workers can actually use them when they need to.

Little reporting does not mean that formal channels are absent. The Ministry of Labor provides labor complaint mechanisms and the Inspection Services Guide lists a non-Jordanian's work permit among the required documents "if any." This is consistent with the ministry official's explanation that not holding a work permit does not, in principle, extinguish the rights in an employmentrelationship.[156]

The findings indicate that the actual ability to use these channels is affected by a range of factors, including legal status, fear of dealing with official institutions, dependence on an employer, economic need, knowledge of procedures, and the worker's own assessment of the potential benefits and risks of filing a complaint.

1. Problems and Violations Reported

The quantitative data showed that 55% of respondents reported working more than eight hours a day, 49% reported delayed payment of wages, 27.7% reported non-payment of wages in some cases, and 18.3% reported working conditions they considered unsafe.[157]

Not all of these indicators would necessarily amount to a final legal finding that a violation took place. Assessing working hours, for example, requires looking at weekly hours, overtime, and compensation for it. Withholding wages, safety violations, and other incidents are likewise subject to assessment according to the facts of each case and the provisions of the law.

The qualitative findings included accounts of working long hours without additional pay, deductions from wages, failure to honor terms that were agreed upon, being denied leave, and pressure linked to workplace injuries, as well as accounts of threats, harassment, and unwanted behavior.[158]

This study treats these testimonies as participants' accounts unless they are supported by an official source or an independent court ruling.

2. Limited Reporting of Labor Problems

Only 7.4% of all respondents said they had ever reported a violation.[159] This figure is one of the study's most important findings. The difference between the scale of problems participants reported and the reporting rate suggests that having a problem does not automatically lead to using a complaint channel.

155. IRCKHF, [Key Survey Findings], op. cit..
156. Jordanian Ministry of Labor, [Inspection Services Guide: Individual Labor Complaints], op. cit.; Interview with Riyad Barham, Director of the Migrant Workers Directorate, Jordanian Ministry of Labor, op. cit.
157. IRCKHF, [Key Survey Findings], op. cit..
158. IRCKHF, [Focus Group Discussion Outputs], op. cit.
159. IRCKHF, [Key Survey Findings], op. cit..

This figure alone cannot explain why workers did not report, nor should it be assumed that every respondent who reported a problem needed to file a formal complaint about it. When considered with the data on fear of institutions, knowledge of legal aid, and confidence in fair handling of complaints and the qualitative testimonies, however, this finding reveals a set of potential barriers that affect a worker's decision to turn to an official body.

3. The Difference Between Knowing Where to Get Help and Accessing It

66.8% of respondents said they knew where they could get legal aid.[160]

Even so, the actual rate of reporting violations remained at 7.4%. The two figures cannot be compared directly or measured as the same thing: knowing where to get legal aid is different from experiencing a violation, and different again from deciding to file a complaint.

The wide gap between the two indicators shows that basic knowledge on the existence of a source of help is not enough on its own to ensure it is used.

Focus group participants confirmed this. Some said that at first, they did not know which body was responsible, while others said they knew that channels for help existed but did not see using them as a practical or safe option in their circumstances.[161]

4. Availability of Complaints to Non-Jordanian Workers

The Ministry of Labor provides methods of filing individual labor complaints, including in person, by telephone, by electronic means, and through the "Hemaya" platform. The Inspection Services Guide lists a non-Jordanian's work permit among the required documents **"if any"** and allows some complaints to be handled confidentially.[162]

The interview with the Ministry of Labor official confirms that a violation relating to the work permit does not, in principle, cancel the labor rights in an employment relationship, and that the worker can claim wages and other entitlements through the competent authorities.[163]

This does not mean that a worker without a permit cannot face other legal issues linked to their status. It means that a distinction must be made between their right to claim labor rights and the regulatory violation relating to the work permit.

This issue clarifies the difference between the formal availability of complaints and a worker's sense of safety in using them.

160. Ibid.
161. IRCKHF, [Focus Group Discussion Outputs], op. cit.
162. Jordanian Ministry of Labor, [Inspection Services Guide: Individual Labor Complaints], op. cit.; Jordanian Ministry of Labor, "[Himaya Platform for Labor Complaints]".
163. Interview with Riyad Barham, op. cit.

5. Fear of Legal Consequences

The previous sections showed that 40.6% of respondents avoid government offices for fear of detention, being held accountable, or expulsion, with higher rates among Yemenis and Iraqis.[164]

This finding does not directly measure the reasons for not filing labor complaints, so it cannot be concluded that fear of expulsion is the main or most common reason for not complaining.

The focus groups did, however, include accounts from Iraqis and Yemenis in which participants linked their hesitation to approach institutions to their residency status or working without a permit and to fear of the possible consequences.[165]

The study shows that fear associated with legal status emerged as one possible factor limiting access to institutions, not that every complaint leads to detention, deportation, or removal.

6. Economic Dependence and Fear of Losing Work

The qualitative testimonies showed that the need to keep a source of income affects some workers' ability to confront their employer or pursue a complaint.

Participants described cases in which workers stayed in their jobs despite delayed wages or poor working conditions because it was hard to find an alternative.[166]

There was also an account of a Syrian worker whose employer, according to one participant, made him drop a complaint about a workplace injury as the condition for keeping his livelihood and having a work permit issued for him.[167]

This case is not meant to generalise, but it does show how economic dependence on an employer can reduce the practical ability to exercise a right that exists in law.

7. Confidence in Handling Complaints

35.1% of respondents said they were very confident that their complaint would be handled fairly and 45.5% that they were somewhat confident, while 19.3% were not confident.[168]

This finding prompts an important observation: stated confidence in the fair handling of complaints is much higher than the actual use of complaints.

164. IRCKHF, [Key Survey Findings], op. cit.
165. IRCKHF, [Focus Group Discussion Outputs], op. cit.
166. Ibid.
167. Ibid.
168. IRCKHF, [Key Survey Findings], op. cit.

This does not mean that confidence has no bearing on the decision to report. It shows that the low rate of complaints cannot be linked to a lack of confidence alone. Other factors may also be at play, such as the need to keep working, time, legal status, fear of the employer, and knowledge of the details of the procedure.

Assessing access to justice must go beyond the question, "Do you trust the system?" to a broader question: whether a person can start the process, stay with it, and reach an outcome.

8. Differing Experiences Across Groups

The focus groups show differences in the experiences that members of each group described when talking about protection and complaints.

Some Syrian and Iraqi participants spoke of slow responses or of the limited support they believed to have received from some bodies, while Yemeni participants expressed doubts about the point of turning to institutions in some cases.[169]

However, there were cases where participants managed to obtain a means of redress, including an account of a worker who, with the help of the police and the testimony of others, recovered what he was owed, along with a case mentioned by one Gazan participant of going to court over non-registration with social security and obtaining a ruling in the worker's favor.[170]

Rather than these cases providing an assessment of institutional performance or a quantitative comparison between groups, they show that experiences are not uniform. The process may succeed for some, while others feel that its cost, risks, or duration make it impractical.

9. Women's Access to Complaints

The focus groups provided accounts of sexual or other types of harassment and unwanted behavior that some women faced while looking for work or in the workplace.[171]

These cases reveal a potential additional barrier to complaining, particularly where economic needs combine with the fear of losing work, stigma, or further harassment.

The study does not provide an estimate of the rate at which women report harassment or a separate measure of their use of complaint pathways. Therefore, it draws no quantitative conclusion about women's access to justice. Instead, it highlights the need for complaint mechanisms to be safe, confidential, and able to take into account the nature of violations.

169. IRCKHF, [Focus Group Discussion Outputs], op. cit.
170. Ibid.
171. Ibid.

10. Courts and Proving Labor Rights

Redress is not limited to the administrative route before the Ministry of Labor. Labor disputes and claims can reach courts, in accordance with the rules of jurisdiction and legal procedure.

The Ministry of Labor official confirmed that the absence of a work permit does not, in principle, extinguish labor rights or make it impossible to prove an employment relationship in court.[172]

This is consistent with the nature of the employment contract in Jordanian legislation, which does not consider a written document as the only means of proving the relationship.[173]

This study has no quantitative data on how many participants went to court, how long cases took, what they cost, or how often they succeeded, so it cannot assess access to the labor courts in general. What can be concluded is that the existence of a judicial route does not by itself settle the question of actual access to it. Knowledge, legal aid, time, cost, and proof of the facts all continue to affect a person's ability to use it.

11. Legal Aid

66.8% of respondents know where to get legal aid, which shows a degree of awareness of support services within the sample.[174]

The qualitative findings, however, show unequal experiences of accessing these services. Some participants spoke of slow or limited responses, while others said they had not known about the available services at earlier stages of their experience.[175]

This study does not assess the quality of legal aid providers or their performance. It indicates that the effectiveness of legal aid depends not only on its existence, but also on how easy it is to reach, how quickly it responds, and whether it can deal with the actual problem faced.

12. From Complaint Channels to Access to Justice

The findings show that the existence of a channel for filing complaints is the beginning of the process, not the end.

Actual access to justice passes through a chain of stages: recognising that a right has been violated, knowing which body can help, feeling safe enough to contact it, being able to prove the facts or employment relationship, receiving follow-up, then reaching a form of redress.

172. Interview with Riyad Barham, op. cit.
173. Labor Law No. 8 of 1996, as amended, op. cit., provisions on the employment contract and how it is proved.
174. IRCKHF, [Key Survey Findings], op. cit.
175. IRCKHF, [Focus Group Discussion Outputs], op. cit.

This chain can break at any stage. A worker be aware of their rights but not file a complaint, or start the procedure but be unable to pursue it, or prefer to agree on a settlement or drop the claim because they need to keep working.

The gap is not in knowledge between having a right and not having it, but between having a right in law and being able in practice to enforce it.

This is among the study's most important findings, because it shifts the assessment of the protection system from the mere existence of legislation and institutions to whether the person who needs them can actually use them.

13. Legal Status and the Practical Ability to Claim Rights

The findings indicate that some elements of legal status may intersect with a worker's ability to use protective mechanisms, but the study cannot establish an independent relationship of each element.

A worker with a permit, written contract, and stable residency may face barriers to claiming their rights, just as a worker without a permit may be able legally and in practice to bring a successful claim.

However, the focus groups indicate that insecure residency, working without a permit or a written contract, and dependence on the employer or an intermediary may, in some cases, combine to make the decision to confront the employer or file a complaint more difficult.[176]

The importance of legal status here lies not in whether it confirms the existence of a labor right, but in the fact that, with other factors, it may affect the practical position from which a worker tries to claim that right.

14. Summary

The study reveals a clear gap between the labor problems that participants reported and the use of complaint mechanisms. The proportion of those who had ever reported a labor violation did not exceed 7.4% of the whole sample.[177]

This finding cannot be explained by the absence of rights or complaint channels alone. The Ministry of Labor provides multiple complaint channels, its guide states that a non-Jordanian's work permit is required "if any," and the interview conducted for the study confirms that a permit-related violation does not, in principle, cancel labor rights.[178]

176. Ibid.
177. IRCKHF, [Key Survey Findings], op. cit.
178. Jordanian Ministry of Labor, [Inspection Services Guide: Individual Labor Complaints], op. cit.; Interview with Riyad Barham, op. cit.

At the same time, the findings reveal potential barriers relating to the fear of dealing with institutions, economic dependence, instability in some elements of legal status, knowledge of procedures, time, cost, and the worker's assessment of whether filing a complaint will improve their situation or expose them to additional risks.

The contrast between knowledge of legal aid and stated confidence in the fair handling of complaints to the low actual use shows that measuring access to justice should not stop at the existence of an institution or formal channel.

The central finding is that the existence of a right and a complaint mechanism is a necessary condition, but not sufficient for actual access to redress. Safety, ease of use, legal aid, proof of the employment relationship, and the ability to see a procedure through are required to be treated as parts of the access-to-justice system itself.

11. Intersecting Factors Affecting Access to Decent Work

The study's findings show that the barriers affecting access to decent work do not always operate separately. Nationality, legal status, and document type may intersect with gender, age, student status, disability, and caregiving responsibilities, make it so that experiences differ even among people from the same national group.

In this section, the study does not aim to create fixed categories or to claim that a given characteristic inevitably leads to a particular outcome; it aims to show that the accumulation of more than one factor may change the options open to a person and their ability to access lawful work, remain in it, and utilize protective mechanisms when needed.

1. The Intersection of Gender and Working Conditions

The data showed differences between women and men on some work indicators. The proportion of women with a monthly income below 290 JOD was 84.5%, compared to 55% of men.[179]

Some casual work patterns, including on-demand or piece-rate work, were also more common among women in the sample.[180]

This data alone does not attribute the differences to gender, as occupation, nationality, legal status, caregiving responsibilities, and the nature of available opportunities all intersect with it, which points to the need to look past overall averages when analysing working conditions.

179. IRCKHF, [Qualitative and Quantitative Field Research Outputs: Study of Refugees in the Jordanian Labor Market], op. cit.
180. Ibid.

The qualitative findings support this. Female participants spoke of limited opportunities in some occupations, the need to balance work and family responsibilities, and accepting work arrangements that may be less stable, but offer flexible working hours.[181]

2. Safety and Harassment

The focus group discussions produced accounts of unwanted practices that some women faced while looking for work or in the workplace, including requests for personal photographs in the course of a job search attempts to establish personal contact, and harassment and unwanted physical behavior.[182]

One Iraqi participant described leaving her job after, according to her, being subjected to unacceptable physical behavior by her employer and not being paid for that day.[183]

These testimonies do not allow the prevalence of harassment in the labor market, or among refugee women in general, to be measured. They do show, however, that safety and dignity in the workplace form a distinct dimension of decent work and that limited economic alternatives may make the decision to leave a workplace or file a complaint more difficult.

3. Patterns of Caregiving Responsibilities and Choice of Work

The focus group discussions showed that family and caregiving responsibilities affected some women participants' choices about the pattern, hours, and location of their work.[184]

Some women turned to home-based activities, such as preparing food or producing simple goods, which allowed them to combine earning an income without neglecting their caregiving responsibilities. However, according to the participants, these activities ran into problems related to registration, licensing, the nature of the property, or complaints about the activity.[185]

This does not mean that home-based or flexible work is inherently of lower quality. The problem comes when this pattern is chosen because alternatives are limited, when the activity cannot be regularized, or the protection associated with it cannot be obtained.

4. Combining Study and Work

The issue of students came up clearly in the focus group discussions, particularly among Syrians, Iraqis, and Yemenis. Some participants spoke of needing to work to cover education and living costs while still enrolled in their studies.[186]

181. IRCKHF, [Focus Group Discussion Outputs: Study of Refugees in the Jordanian Labor Market], op. cit.
182. Ibid.
183. Ibid.
184. Ibid.
185. Ibid.
186. Ibid.

This issue is not merely a matter of participants' perception. The Ministry of Labor's current criteria show that non-Jordanian students enrolled at university may not be employed for the first time.[187] In March 2025, the Ministry announced that a non-Jordanian student in the Kingdom for the purpose of education is not permitted to enter the labor market under the regulations in force.[188]

This rule is consistent with what the Director of the Migrant Workers Directorate explained in the study interview: Under the current system, student status and the work permit route cannot be combined.[189]

The issue matters when a student genuinely needs an income to cover expenses. A Yemeni student spoke of working to cover his expenses despite fears of how this might affect his status. Syrian participants also described working while studying to cover university and living costs.[190]

A non-Jordanian student who needs an income faces a practical conflict between economic needs and the regulatory route available to them. This is a different matter from the occupational restrictions they may face after graduating.

5. The Transition from Education to Work

10.9% of the total study sample was made up of participants aged 18–24.[191] However, the size of this group and the nature of the available tables do not provide a reliable separate analysis of young people's path from education to work, or a comparison of their employment rates with those of other age groups.

This study does not use the share of full-time work in the whole sample as an indicator of young people's situation specifically, because that would conflate the age group's denominator with that of the full sample. What can be concluded is that the focus group discussions included experiences of young people and students who faced difficulties regarding study and work or moving into work that matched their qualifications. This is a qualitative finding that merits further study and cannot on its own be used to assess the situation of young refugees in general.[192]

6. Persons with Disabilities

Some Syrian focus group discussions produced accounts of difficulties faced by persons with disabilities in accessing job opportunities or arrangements linked to proof of disability.[193]

187. Jordanian Ministry of Labor, The Comprehensive Guide of Principles for Issuing Work Permits for Non-Jordanian Workers, op. cit., clause barring first-time employment of non-Jordanian students enrolled in university study.
188. Jordanian Ministry of Labor, "[Labor: Any non-Jordanian student caught working in the labor market will be deported]", 16 March 2025.
189. Interview with Riyad Barham, Director of the Migrant Workers Directorate, Jordanian Ministry of Labor, op. cit.
190. IRCKHF, [Focus Group Discussion Outputs], op. cit.
191. IRCKHF, [Key Survey Findings: Study of Refugees in the Jordanian Labor Market], op. cit.
192. IRCKHF, [Focus Group Discussion Outputs], op. cit.
193. Ibid.

Some participants linked these difficulties to not having the documents they believed were required to obtain the identification card for persons with disabilities, including a national number.[194]

The study has no quantitative data to determine the scale of this problem and did not independently verify all legal and procedural requirements for issuing the card to these groups.

This finding should be treated as a qualitative signal requiring further verification, not a general legal rule. Its importance lies in revealing a possible intersection between disability and documentation status: the barrier may relate not only to the disability itself, but also to access to the service or arrangement that is supposed to support participation in the labor market.

7. Education, Gender, and Legal Status

Earlier sections showed cases of people with university qualifications who are not working in their fields. Some qualitative cases show that this problem took on an additional dimension for women with qualifications in fields such as pharmaceutical, engineering, and dentistry, who were unable to practise them.[195]

The data cannot determine whether women are statistically more likely than men to work outside their field. The qualitative cases show how occupational restrictions can combine with limited opportunities and some gender-related considerations to narrow an individual's practical options. Academic qualifications should therefore not be analysed in isolation from occupation, nationality, gender, and legal status.

8. Nationality and Gender Cannot be Separated

"Refugee women" are not a homogeneous group from a labor market perspective. Syrian women enter the labor market under arrangements that differ from those for Iraqi or Yemeni women, while Gazan women face a different documentation and regulatory situation.

These differences mean that gender-related challenges may take different forms depending on the group's legal pathway. For some Iraqi and Yemeni participants, for example, the need for income may intersect with insecure residency, while for other groups, occupational or documentation restrictions intersect with other factors.[196]

This study cannot determine the independent effect of each factor statistically, but it does show that considering gender or nationality on its own may conceal important differences within each group.

194. Ibid.
195. Ibid.
196. Ibid.

9. Income as a Multi-Factor Outcome

The study showed variation in income levels by gender and nationality, but the available data does not attribute these differences directly to legal status or any single factor. Income levels may be affected by occupation, working hours, experience, gender, type of establishment, the form of the employment relationship, nationality, legal status, and other variables.

The qualitative accounts indicate that some participants accepted low-paid work because of limited alternatives, and some women described needing work arrangements compatible with their family responsibilities.[197]

The significance of intersection here lies not in proving a causal relationship between a particular characteristic and income, but in showing that a person's ability to refuse a wage or working conditions may vary with the full set of options and constraints they face.

10. Accumulated Factors and the Ability to Use Protective Mechanisms

The effects of this intersection is clearest in the process of obtaining work and being able to claim one's rights.

A worker with a combination of working without a permit, having no written contract, acute need for income, and fear of dealing with institutions may find it harder to choose to complain than someone in a more stable situation.

Similarly, for some women, caregiving responsibilities may compound with the need for income and safety concerns, while a student working outside the permitted route may hesitate to contact an official body if they believe it could affect their status as a student.[198]

These examples are not a fixed formula that can be applied to every case, but they show that access to justice is shaped by the full set of circumstances surrounding a person, not by the nature of the violation alone.

11. Intersection is not Creating Fixed Categories

It is important that the analytical approach does not result in sorting participants into rigid groups. A single person may fit more than one description: a woman, a student, a breadwinner, a university graduate, of a nationality subject to particular residency requirements, and working without a permit. Another person of the same nationality and gender may follow an entirely different path. Hence, addressing a single barrier may not always be enough. Making work permits easier to obtain, for example, will not on its own resolve a student's situation if the rules preventing their employment while studying remain in place, and providing a complaint channel will not automatically remove economic fear or the risk of losing a source of income.

The value of intersectional analysis lies in identifying the point at which barriers accumulate, rather than assuming there is a single solution that suits every member of a group.

197. Ibid.
198. Ibid.

12. Limits of the Evidence on Intersection

The study was able to identify some quantitative differences by gender and nationality, and the focus group discussions provided qualitative evidence on students, caregiving responsibilities, harassment, and disability.

However, the sample size and study design do not allow a multivariate statistical analysis to determine the independent or combined effect of nationality, gender, age, disability, student status, and legal status.

Therefore, the study does not prove causal relationships, but as a framework that helps explain how different barriers may intersect in one person's experience.

This limitation is especially significant for the findings on persons with disabilities, youth, and students, where the evidence relies more heavily on qualitative testimony or small numbers.

13. Summary

The study's findings show that access to decent work is shaped by the interaction of multiple factors, and cannot be explained by nationality, work permit, or gender alone.

The data shows significant differences in income and some work patterns by gender, while the qualitative findings reveal the influence of caregiving responsibilities, safety, and harassment on some women's experience. Non-Jordanian students also face a clear regulatory restriction on working while studying. The accounts concerning persons with disabilities point to possible barriers that require further verification.

These findings do not indicate that all members of these groups face the same circumstances. The most important finding is that the accumulation of more than one barrier may make the path towards accessing work to receiving protection and claiming rights more difficult.

The most effective policies are those that do not treat target groups as homogeneous, and instead take account of the different legal, social, and economic pathways within each group.

This analysis leads into the next section, which directly compares the experiences of Syrians, Iraqis, Yemenis, and Gazans, in order to highlight the differences in pathways, barriers, and outcomes between the four groups.

12. Comparing the Experiences of the Four Groups

The study's findings show that treating Syrians, Iraqis, Yemenis, and Gazans as a single group may obscure fundamental differences in the legal and procedural pathways that affect access to the labor market.

The four groups do not enter the market from the same legal position, nor are they subject to the same requirements for residency, documents, work permits, and available occupations. The work patterns that emerged in the fieldwork differ, as does the degree of reliance on intermediaries and the nature of fears about official institutions.

At the same time, the groups share common challenges, including poor documentation of the employment relationship, low income among a significant proportion of participants, long working hours in some cases, delayed wages, and limited access to forms of social protection.

The comparison that follows does not aim to rank the groups from "best" to "worst", but to identify the most prominent patterns of barriers for each group.

1. Syrians: A Variety of Pathways to Lawful Work

Syrians benefit from more varied work permit arrangements than the other groups covered by the study, including ordinary, temporary, and flexible permits.[199] Some of these arrangements offer greater flexibility in terms of the tie to the employer and the range of occupations the permit covers, but this does not mean that occupational or procedural restrictions disappear.[200]

Even so, no more than 10% of Syrians in the sample reported holding a valid work permit.[201] Cost was among the main reasons participants gave for not obtaining a permit.

On working conditions, 74% of Syrian participants reported working without a written contract, and 68% earned less than 290 JOD.[202] In addition, 44% reported that sectoral restrictions limit their ability to work in the occupation they are skilled in, while 32% reported that their current work does not match their skills.[203]

The focus group discussions reveal cases of people who moved into work outside their fields or into volunteering and temporary work, along with fears related to inspection among those working without a permit.[204]

What sets the Syrian experience apart is that the challenge lies not in the absence of a legal pathway to work, but in the usability of that pathway and how it translates into a stable and decent employment relationship.

2. Iraqis: Residency Overlaps with Weak Access to Lawful Work

Residency problems stand out more clearly in the Iraqi experience. 90% of Iraqi participants in the sample reported accumulated residency fines.[205]

199. Jordanian Ministry of Labor, The Comprehensive Guide of Principles for Issuing Work Permits for Non-Jordanian Workers, op. cit.
200. Ibid.; Interview with Riyad Barham, Director of the Migrant Workers Directorate, Jordanian Ministry of Labor, op. cit.
201. IRCKHF, [Qualitative and Quantitative Field Research Outputs: Study of Refugees in the Jordanian Labor Market], op. cit.
202. Ibid.
203. Ibid.
204. IRCKHF, [Focus Group Discussion Outputs: Study of Refugees in the Jordanian Labor Market], op. cit.
205. IRCKHF, [Key Survey Findings: Study of Refugees in the Jordanian Labor Market], op. cit.

The survey recorded no case of a valid work permit among Iraqi respondents. This cannot be generalised to all Iraqis in Jordan, but it points to limited access to permits within the sample.[206]

Iraqis were also recorded as having the highest rate of those working without a written contract, at 96%, and roughly the same proportion earned less than 290 JOD.[207] On occupational restrictions, 82% reported that sectoral restrictions limit their ability to work in the occupation they are skilled in, the highest figure among the four groups in the sample, while 32% reported that their current work does not match their skillset.[208]

The qualitative findings highlight experiences of working through intermediaries, particularly in hospitality and events sectors, along with accounts of deductions and delayed or unpaid wages.[209] In addition, 58% of Iraqis reported avoiding government offices for fear of detention, being held accountable for problems, or expulsion.[210]

Taken together, these findings indicate that the Iraqi experience is marked by the overlap of residency problems, weak access to permits, less formal work, occupational restrictions, and limited use of qualifications.

3. Yemenis: Residency, Lawful Work, and Fear of Enforcement

The Yemeni experience resembles the Iraqi one in some respects, especially related to residency and lawful work, but it shows additional features.

83.3% of Iraqis and Yemenis combined reported accumulated residency fines. 7.7% of Yemenis in the sample reported holding a valid work permit.[211]

In the survey, 61.5% of Yemenis avoid government offices for fear of detention, being held accountable for issues, or expulsion, the highest rate on this indicator among the groups.[212] On working conditions, 84.6% had no written contract, while 68.8% earned less than 290 JOD.[213]

In addition, 61.5% reported that sectoral restrictions limit their ability to work in the occupation they are skilled in, while 46.2% reported that their current work does not match their skills, the highest rate among the four groups.[214]

The focus group discussions also included accounts of working through intermediaries, wage deductions, delayed payment of dues, threats to report workers or call the police, and, in some cases, retention of documents.[215]

206. IRCKHF, [Qualitative and Quantitative Field Research Outputs], op. cit.
207. Ibid.
208. Ibid.
209. IRCKHF, [Focus Group Discussion Outputs], op. cit.
210. IRCKHF, [Key Survey Findings], op. cit.
211. IRCKHF, [Qualitative and Quantitative Field Research Outputs], op. cit.
212. IRCKHF, [Key Survey Findings], op. cit.
213. IRCKHF, [Qualitative and Quantitative Field Research Outputs], op. cit.
214. Ibid.
215. IRCKHF, [Focus Group Discussion Outputs], op. cit.

These accounts do not provide an estimate of how widespread such practices are among Yemeni refugees in general, but they do show that the Yemeni experience in the study is marked by the overlap of residency problems, difficulty regularising work, fear of enforcement, work outside of their skillsets, and some indicators of exploitation.

4. Gazans: Documentation Status and Gaps in Economic Transactions

The situation of Gazans differs from that of the other three groups in terms of documents and some regulatory arrangements.

Under the official framework they need a work permit, but they are exempt from permit fees and have some concessions regarding the documents used in the application.[216]

Even so, the study found that participants' knowledge of these arrangements varied, including the need for a permit, its cost, and requirements.[217]

The lack of a national number was brought up repeatedly in the focus group discussions, with participants linking it to difficulties with some jobs, e-government services, and registering vehicles or economic activities.[218]

The study treats these accounts as participants' experiences, not as evidence that the lack of a national number legally bars all of these transactions.

On working-condition indicators, 66% of Gazans reported working without a written contract, the lowest proportion among the four groups, while 44.9% earned less than 290 JOD, also the lowest in the sample.[219]

60% reported that sectoral restrictions limit their work in the occupation they are skilled in, while only 8% reported that their current work does not match their skillset.[220]

Some testimonies show more regular experiences in registered companies, including a contract, social security, and regular pay, while other cases faced difficulties related to documents or the registration of an economic activity.[221]

The nature of the barrier is thus different for Gazans. It appears less linked to residency than for Iraqis and Yemenis, and more linked to the type of documents, the national number, and some economic and professional transactions.

216. Jordanian Ministry of Labor, The Comprehensive Guide of Principles for Issuing Work Permits for Non-Jordanian Workers, op. cit.; Jordanian Ministry of Labor, "[White card to be accepted instead of the temporary passport for issuing work permits]", op. cit.
217. IRCKHF, [Focus Group Discussion Outputs], op. cit.
218. IRCKHF, [Focus Group Discussion Outputs], op. cit.
219. IRCKHF, [Qualitative and Quantitative Field Research Outputs], op. cit.
220. Ibid.
221. IRCKHF, [Focus Group Discussion Outputs], op. cit.

5. Similarities Between the Four Groups

Despite differences in legal and regulatory options, the study reveals a number of common features. First, education or experience does not guarantee the ability to work in the same field. Cases of working outside one's field appeared in all four groups, albeit to different degrees. Second, working without a written contract is a widespread pattern across all groups, although its rate varies markedly.[222] Third, all groups show problems with the quality of working conditions, such as low income, delayed wages, long working hours, and weak access to some forms of social protection. Fourth, the findings reveal a shared gap between the existence of a right or formal pathway and the practical ability to use it, whether in relation to work permits, occupations, or complaints. Finally, legal status does not appear as an isolated factor. It interacts with occupation, documents, the employer, gender, the type of establishment, and other factors.

6. Differences in the Most Prominent Barrier Pathway

The most prominent pattern for each group can be summarised as follows:

- **Syrians:** More varied pathways to lawful work, alongside continuing barriers related to cost, occupations, and how far a permit translates into decent working conditions.
- **Iraqis:** A clear overlap between residency and fines, weak access to permits, occupational restrictions, and less formal work.
- **Yemenis:** An overlap of residency, lawful work, fear of dealing with institutions, and work outside their skills, along with some indicators of exploitation.
- **Gazans:** A distinct documentation status, gaps linked to the national number, some economic and professional transactions, and official exemptions and concessions of which not all participants appear to be fully aware.

This does not mean that every individual in a group follows this same pathway; rather, it identifies **the pattern most present in the evidence collected in the study**.

222. IRCKHF, [Qualitative and Quantitative Field Research Outputs], op. cit.

7. Comparative Table of the Four Groups

Dimension	Syrians	Iraqis	Yemenis	Gazans
Residency	Less prominent as a direct barrier in the field evidence	Prominent barrier; 90% accumulated fines	Prominent barrier within the findings for Yemenis	Less prominent in field evidence than for Iraqis and Yemenis
Holding a valid work permit	10%	0%	7.7%	4%
Working without a written contract	74%	96%	84.6%	66%
Income below 290 JOD	68%	96%	68.8%	44.9%
Sectoral restrictions limiting work in the occupation one is skilled in	44%	82%	61.5%	60%
Current work does not match skills	32%	32%	46.2%	8%
Avoiding government offices for fear of detention, being held accountable for issues, or expulsion	Lower in the sample than among Iraqis and Yemenis	58%	61.5%	Lower than among Iraqis and Yemenis
Intermediaries	Limited cases, qualitative	Prominent in some qualitative accounts, especially events and hospitality	Prominent in some qualitative accounts, especially in cleaning	Less prominent in the qualitative accounts
Most prominent legal/procedural pattern	Varied permit types, with continuing barriers	Residency, permits, and occupational restrictions	Residency, enforcement, and work outside skillset	Documents, the national number and some economic transactions

The percentages in the table describe only the sample covered by the study and are not estimates of prevalence among all Syrians, Iraqis, Yemenis, or Gazans in Jordan.[223]

A distinction should also be drawn between the numerical rows, which are based on comparable indicators within the survey, and the descriptive rows on intermediaries or the nature of the barrier, which rely more on qualitative analysis.

223. Ibid.

8. The Need for Differentiated Responses

The comparison shows that a uniform response for all groups will not address the barriers identified by the study equally.

An intervention that tackles the cost of a work permit may help certain groups, but will not on its own address residency fines or approval requirements for other groups. Likewise, improving access to some occupations will not resolve the problem of documents or the lack of a national number in transactions that depend on it, nor will it on its own address fear of institutions or poor documentation of the employment relationship.

On the other hand, there are common interventions that could serve all groups, such as clear information, better documentation of employment relationships, wage protection, and improved access to complaints and legal aid.

The findings therefore point to the need to combine general labor market reforms with specific responses that take into account each group's legal and regulatory situation.

9. Summary

The comparison confirms that the four groups share multiple challenges related to decent work, but these challenges occur through different means.

Syrians benefit from the most varied work permit pathways, although gaps persist in their use and in working conditions. Iraqis face a clearer overlap between residency, weak access to permits, occupational restrictions, and less formal work. Yemenis show an overlap between residency, lawful work, fear of institutions, and work outside their skillsets. The experience of Gazans differs in its greater focus on documentation status, the national number, and some economic transactions, with indications within the sample of relatively better levels on some aspects of contracts and income.

This comparison should not be read as a ranking of the groups or a general judgement on their situation, but as an illustration of the different ways that the barriers emerged in the study.

The key finding is that there is not only one refugee experience in the Jordanian labor market. Experience is shaped by the ways that nationality, legal status, documents, residency, occupation, the nature of the employment relationship, and other factors interact.

This sets the stage for moving from describing and comparing the findings to discussing their broader meanings and what they reveal about the relationship between the legal framework, its application, and actual experience.

13. Discussion

The study's findings show that access to work for the target groups cannot be understood simply in terms of whether a job is available or a permit obtained. It should be seen as an interconnected pathway that begins with legal status, documents, and residency, then passes through the work permit and the available occupation, and ends with working conditions, social protection, and the possibility of claiming rights.

The central finding is that the gap lies not only between the text of the law and its application, but also between the formal existence of a right or procedure and a person's ability to understand, reach, and actually use it.

1. The Gap Between the Existence of a Right and its Usability

Jordan's legal framework provides a set of rights and mechanisms relating to wages, the employment relationship, inspection, complaints, and occupational safety and health. Not holding a work permit does not, in principle, extinguish the rights in the employment relationship.[224]

The study's findings show, however, that the existence of these rights does not, in itself, guarantee that they can be used. Insecure residency, working without a permit or written contract, economic dependence on the employer or intermediary, and fear of official bodies may combine to make claiming a right more difficult.

This gap is clearly visible in the low use of complaint mechanisms relative to the problems participants reported. The challenge, therefore, is not only to extend legal rights, but to make existing rights usable in a practical and safe way.

2. A Refugee's Position Within the Framework Regulating Non-Jordanian Workers

Refugees are, in principle, subject to the general rules governing the employment of non-Jordanian workers with respect to work permits, occupations, violations, and penalties.[225]

This approach serves a legitimate purpose of regulating the labor market, but its outcomes may differ when applied to a person who did not come to Jordan to work in the first place and may be unable to return to their country because of protection risks.

224. Labor Law No. 8 of 1996, as amended, op. cit.; Interview with Riyad Barham, Director of the Migrant Workers Directorate, Jordanian Ministry of Labor, op. cit.
225. Prof. Hamdi Al-Qbeilat, [The Legal Framework for Refugee Work in Jordan: A Study of the Regulation of Syrian, Iraqi, Yemeni and Palestinian Labor], op. cit.

This particular position becomes more important when a labor or residency violation results in deportation or removal. Such a measure against a refugee does not automatically constitute a violation of the principle of non-refoulement, but carrying it out may enhance that issue if the person would be forced to return somewhere that they face a risk prohibited by law. In such cases, an individual risk assessment and effective procedural safeguards become essential.[226]

The refugee's particular position therefore does not require exempting them from labor market rules, but taking their protection status into account when applying some of the legal consequences of those rules.

3. Uneven Accessibility of Lawful Work

The comparison between the four groups shows that the existence of a legal pathway to work does not mean it is equally usable for all.

The Syrian experience shows that developing many types of work permits can broaden the available pathways, but does not automatically remove barriers of cost, occupation, and working conditions. In contrast, the Iraqi and Yemeni experiences reveal a great overlap between residency, the work permit, and related approvals. Meanwhile, Gazans face challenges more closely linked to documents, the national number, and some economic transactions.[227]

Therefore, assessing the effectiveness of the work permit system should not be limited to whether a pathway exists or how many permits are issued, but should include how far a person can realistically and stably move through it from start to finish.

4. Work Outside the Lawful Pathway and Intermediaries

The findings indicate that some less formal work arrangements are a practical response when lawful channels are difficult to use or limited for the worker.

These arrangements may, however, come with poor documentation of the employment relationship, dependence on the employer or intermediary, a lack of clarity about wages, deductions, responsibilities, and greater difficulty proving rights in a dispute.[228]

The role of intermediaries stands out in this context not as a separate phenomenon, but as a result of limited ability to reach the employer or the lawful labor market directly in some cases. Intermediation does not in itself indicate exploitation, but a lack of transparency about wages and responsibilities may increase the likelihood of unfair practices.

This finding suggests that enforcement alone is not enough to address informal work if the pathways to lawful work remain unusable for some groups.

226. Dr. Samer Haddadin, Legal Gap Analysis: Refugee Protection and Access to Lawful Work in Jordan, op. cit.; Memorandum of Understanding between the Government of the Hashemite Kingdom of Jordan and the Office of the United Nations High Commissioner for Refugees, op. cit.
227. IRCKHF, [Qualitative and Quantitative Field Research Outputs: Study of Refugees in the Jordanian Labor Market], op. cit.; IRCKHF, [Focus Group Discussion Outputs], op. cit.
228. IRCKHF, [Focus Group Discussion Outputs], op. cit.

5. Occupational Restrictions and the Use of Skills

The study shows that occupational restrictions do not necessarily push a person out of the labor market, but may lead them to move into an occupation that does not match their qualifications or experience. There were cases of people with university qualifications or specialist experience working in other fields, or who had moved into volunteering, temporary work, or activities unrelated to their specialisations.[229]

The study cannot determine which occupations should be opened or have their conditions amended without an independent analysis of labor market needs. It does, however, support the need for periodic review of the available occupations, a distinction between a work permit and a licence to practise a profession, and a clearer link between regulation and the needs of the economy while maintaining priority for the employment of Jordanians.

From this angle, protecting job opportunities for Jordanians and making use of available skills should not be seen as necessarily conflicting goals.

6. Lawful Work is not Necessarily Decent Work

The findings underline the need to distinguish between regulating a worker's entry into the labor market and the quality of the working conditions themselves. A permit and a written contract are important, but on their own, they do not guarantee adequate pay, regular payment, reasonable hours, occupational safety and health, or social protection.[230]

Conversely, a worker without a permit does not, in principle, lose their labor rights. Assessment of labor policies should rest not only on the number of work permits or labor market participation rates, but also on the quality of work and level of actual protection attached to it.

This finding justifies the study's move from the question "Can the person work?" to the broader question: "Can they access lawful and decent work?"

7. Inspection, Fear, and Access to Redress

Inspection has a dual function: it is a tool for enforcing labor market rules and, at the same time, a means of detecting violations and protecting rights.[231]

However, some participants, particularly those working without a permit or in insecure legal situations, see dealing with official bodies as a potential source of risk. This may lead them to avoid inspection or institutions, or hesitate to file a complaint. It is a paradox; the person most in need of protection may be the one least willing to seek it.

229. Ibid.; IRCKHF, [Qualitative and Quantitative Field Research Outputs], op. cit.
230. IRCKHF, [Qualitative and Quantitative Field Research Outputs], op. cit.
231. Jordanian Ministry of Labor, [Inspection Guide for Employers], op. cit.; Interview with Riyad Barham, op. cit.

A low number of complaints cannot be taken as a direct indicator of fewer violations. Recourse to complaints is affected by the need for work, fear of the consequences, knowledge of procedures, dependence on the employer, and how easy the formal route is to use.

The effectiveness of protection should therefore be assessed by actual and safe access to its mechanisms, not merely by its institutional existence.

8. Different Pathways and Intersecting Factors

The comparison shows that a similar outcome does not mean a similar pathway leading to it. There may be people in all four groups that work without a written contract, but the reasons and legal contexts behind this differ.

Nationality is not the only factor: gender, student status, age, disability, caregiving responsibilities, and academic qualifications may interact with legal status to increase or reduce the available alternatives.

Shared general policies, such as strengthening wage protection, documenting employment relationships, and improving complaint mechanisms remain necessary, but they need to be considered with responses that address the barriers specific to each legal pathway or group.

9. Clear Information as Part of Access to a Right

The study showed varying understanding among participants on permit fees, residency, fines, their relationship with UNHCR, the available occupations, and which body is responsible for each procedure.

This finding stands out particularly where official concessions exist that some of the people they target do not know about, as seen in Gazans' experience with the work permit exemptions.[232]

A lack of information is not a secondary awareness-raising matter: people make decisions based on what they believe is possible and available. If someone believes the lawful pathway is unavailable, too costly, or puts their legal status at risk, they may not try to use it at all.

Clear information made consistent across the responsible bodies is an important factor of the usability of the legal system itself.

232. Jordanian Ministry of Labor, The Comprehensive Guide of Principles for Issuing Work Permits for Non-Jordanian Workers, op. cit.; IRCKHF, [Focus Group Discussion Outputs], op. cit.

10. The Overall Significance of the Findings

Considered together, the findings suggest that the main problem is not a complete absence of a legal and institutional framework. Jordan has labor and residency legislation, a work permit system, experience with flexible permits, an inspection apparatus, complaint mechanisms, a social security system, and an anti-trafficking framework.

From the end user's perspective, however, these elements do not always form an integrated pathway that makes it easy to move from legal status and documents to lawful work to an employment relationship that protects rights and provides redress when a violation occurs.

The study reveals three levels of gaps: between the rule and its application; between formal application and actual experience; and between the existence of a procedure and a person's ability to understand and use it.

This is the broader meaning that the study adds. Refugees' access to the labor market cannot be adequately assessed by asking whether work is legally permitted or how many permits have been issued. The whole chain must be considered: from legal status, documents, and residency, to the permit, occupation, contract, and working conditions, and then to inspection, complaints, and access to redress.

Any reform that addresses one link while ignoring others may have a limited effect. Improving access to decent work requires an integrated pathway that combines labor market regulation, priority for the employment of Jordanians, usable procedures, the protection of rights, and attention to the legal and practical differences between the target groups.

14. Conclusions

The study finds that assessing refugees' access to the labor market in Jordan should not be limited to whether a job opportunity exists or a permit can be obtained. It requires looking at the system as a whole: it begins with legal status, documentation, and residency, onto the work permit, the profession, and the terms of the employment relationship, and ends with social protection, the ability to claim rights, and access to redress.

The legal, quantitative, and qualitative evidence points to the following main conclusions:

1. Different Refugee Experiences of the Labor Market

Pathways to work differ markedly between Syrians, Iraqis, Yemenis, and Gazans. Syrians benefit from more varied work permit arrangements, while Iraqis and Yemenis experience a greater overlap between residency and the work permit, and for Gazans, some of the most prominent challenges relate to the nature of their documents, the national number, and certain economic and professional transactions.[233]

233. IRCKHF, [Qualitative and Quantitative Field Research Outputs: Study of Refugees in the Jordanian Labor Market], op. cit.; IRCKHF, [Focus Group Discussion Outputs: Study of Refugees in the Jordanian Labor Market], op. cit.

These differences do not mean that nationality in itself is the explanatory factor. Rather, it reflects the different legal, procedural, and documentary frameworks surrounding each group.

2. Usability of the Lawful Pathway to Work

The study shows that the availability of a work permit, or the existence of a formal procedure, is not enough on its own to guarantee actual access to lawful work. Cost, residency, documentation, profession, the employer's role, and knowledge of the procedures can all limit a person's ability to follow the pathway available to them.[234]

Therefore, the effectiveness of the system is measured not only by whether the procedure exists in law, but by how clear and accessible it is and whether it can be used in practice.

3. The Close Link Between Residency and Work

The findings show that residency status, fines, and the related approvals form a central part of the experience of accessing lawful work for Iraqis and Yemenis.

Although residency and the work permit fall under different institutional mandates, this separation is not always as clear in the worker's practical experience. Problems on the residency track can affect the possibility of regularising work.[235]

4. Access to Lawful Work does not Guarantee Access to Decent Work

The study demonstrates that obtaining a job, or even regularising one's work status, is not enough on its own to guarantee decent working conditions.

The sample showed high levels of work without written contracts, low incomes, delayed or unpaid wages, long working hours in some cases, and limited access to some forms of social protection.[236]

Therefore, a distinction should be drawn between regularising the practice of work, the quality of working conditions, and the protection attached to them.

5. Skills and Qualifications Remain Unutilized

The data reveals cases in which people with qualifications and experience work outside the fields they are qualified in, and some participants reported that sectoral restrictions limit their ability to work in the profession they are skilled in.[237]

234. IRCKHF, [Key Survey Findings: Study of Refugees in the Jordanian Labor Market], op. cit.; Interview with Riyad Barham, Director of the Migrant Workers Directorate, Jordanian Ministry of Labor, op. cit.
235. Ibid.; IRCKHF, [Key Survey Findings], op. cit.
236. IRCKHF, [Qualitative and Quantitative Field Research Outputs], op. cit.
237. Ibid.; IRCKHF, [Focus Group Discussion Outputs], op. cit.

This gap is not due to one factor: the professions open to non-Jordanians may intersect with the requirements for practising a profession, legal status, and demand in the labor market.

The issue is thus not only the ability to find work, but also how far education, experience, and skills are put to productive use.

6. Work Outside the Lawful Pathway Is Linked to Existing Barriers and May in Turn Weaken Protection

The findings indicate that some participants turn to less regulated work arrangements when the lawful pathway is hard to access.

These arrangements may provide income in the short term, but can go hand in hand with poor documentation of the employment relationship, dependence on the employer or intermediary, unclear wages and deductions, and greater difficulty proving rights when a dispute arises.[238]

In some cases, then, work outside the lawful pathway appears to be both a result of existing barriers and a source of additional risk.

7. Testimonies Could Reveal Indicators of Severe Exploitation

The focus group discussions included testimonies of document retention, threats of reporting to the authorities or the police, withholding of wages, and some forms of control over the worker or their access to their wages.[239]

The study does not automatically classify these cases as trafficking in persons or forced labor, because that requires assessing the elements of each case under the law. The presence of these indicators does, however, require the capacity to recognise them, verify them, and refer them to the competent protective mechanisms when they appear.

8. The Core Gap: Between Having a Right and the Ability to Enforce it

The legal framework provides channels for accessing rights, and not holding a work permit does not, in principle, extinguish the rights in an employment relationship.

Even so, actual use of complaints remained limited within the sample and barriers emerged relating to fear of dealing with institutions, dependence on the employer, the need for income, instability in some elements of legal status, and knowledge of procedures.[240]

The existence of a right and of a complaint mechanism are necessary conditions, but alone are not sufficient for actual access to redress.

238. IRCKHF, [Focus Group Discussion Outputs], op. cit.
239. Ibid.; Human Trafficking Prevention Act No. 9 of 2009, as amended, op. cit.
240. IRCKHF, [Key Survey Findings], op. cit.; Interview with Riyad Barham, op. cit.

9. Clear Information to Utilize the Legal System

The study found that knowledge varied among participants regarding work permits and their fees, residency and fines, the professions open to them, the relationship between the different bodies, and some official facilities.

A lack of information is not merely an awareness issue. It can directly affect a person's decision on whether to apply through a formal procedure or keep working outside the lawful pathway.[241] The accuracy, consistency, and accessibility of information impact the usability of the system itself.

10. Barriers Accumulate Differently

Barriers are not evenly distributed within the four groups. Gender, age, student status, disability, caregiving responsibilities, and educational attainment can interact with nationality and legal status to shape the opportunities available and the ability to protect one's rights.

Women, for example, show differences in some income and work indicators, students face a clear restriction on combining study with lawful work, and testimonies concerning persons with disabilities point to additional barriers that call for further investigation and verification.[242]

Thus, refugees, or even members of a single nationality, should not be treated as a homogeneous group.

Overall Conclusion

The study concludes that the main challenge is not the absence of a legal and institutional framework for work, but the gaps that can open up between the law, the procedure, its application, a person's understanding of the system, and their actual ability to use it.

The findings confirm that access to decent work requires looking at the whole chain: from legal status, documentation, and residency, to the work permit and the profession, on to the contract, wages, and social protection, and finally, inspection, complaints, and redress.

The question raised in the study is not whether a refugee can work, but whether they can access lawful and decent work, make use of their skills, and effectively protect their rights when those rights are violated.

241. IRCKHF, [Focus Group Discussion Outputs], op. cit.; Jordanian Ministry of Labor, The Comprehensive Guide of Principles for Issuing Work Permits for Non-Jordanian Workers, op. cit.
242. IRCKHF, [Qualitative and Quantitative Field Research Outputs], op. cit.; IRCKHF, [Focus Group Discussion Outputs], op. cit.

15. Recommendations

Based on the findings of the legal review and the field research, the study recommends a gradual approach aimed at easing the transition to lawful and decent work and reducing informal work and exploitation, while continuing to maintain the requirements of labor market regulation and the priority given to employing Jordanians.

The priorities fall under the following areas:

1. Develop a Clearer, More Usable Procedural Pathway to Lawful Work

It is recommended that the Ministry of Labor, in coordination with the Ministry of Interior and relevant bodies, develop clearer procedures for refugees' work within the regulated framework for non-Jordanian workers, taking into account their differing legal and documentary situations.

This includes:

- Simplifying work permit procedures and the documents required;
- Examining whether features of the flexible permits available to Syrians could be extended to refugees of other nationalities within permitted professions and sectors;
- Reviewing the fees and costs associated with moving into lawful work, where they create a genuine barrier;
- Clarifying the requirements for moving between employers and renewing permits.

Relevant Bodies: Ministry of Labor and Ministry of Interior.

2. Address the Relationship Between Residency and the Work Permit

It is recommended that a more integrated mechanism be developed to deal with cases in which residency fines, or unstable residency, prevent work from being regularised, particularly for Iraqis and Yemenis.

Options should be examined for settling or reducing the impact of fines where a person is genuinely seeking to regularise their status and move into lawful work, alongside better coordination between the Ministry of Labor and the Ministry of Interior on the procedures and approvals required.

When measures are taken that may lead to deportation or removal, the individual's protection situation should also be taken into account, ensuring that the measure is not carried out in a way that forces a person to return to a place where they face a prohibited risk, and providing appropriate procedural safeguards where serious non-refoulement risks are raised.

Relevant Bodies: Ministry of Interior, Ministry of Labor, Public Security Directorate, and the competent judicial authorities.

3. Standardise Official Information and Address Barriers

It is recommended that a simplified, up-to-date official guide be prepared, setting out in a standardised way:

- The types of work permits and their conditions;
- The documents required;
- Fees and exemptions;
- The professions and activities open to refugees;
- The relationship between residency and the work permit;
- The body responsible for each procedure;
- And channels for complaints, appeals, and legal aid.

Particular attention should be paid to clarifying the facilities and exemptions granted to Gazans, as well as for verifying the practical barriers linked to the national number and to documentation in some services and economic transactions.

It is also recommended that refugees with disabilities' access to the documents and arrangements needed for work be reviewed with further institutional verification before specific legal amendments are proposed.

Relevant bodies: Ministry of Labor, Ministry of Interior, Civil Status and Passports Department, and Higher Council for the Rights of Persons with Disabilities, in coordination with other relevant bodies.

4. Review Occupational Restrictions and Link Education and Skills to Labor Market Needs

It is recommended that the professions and activities open to non-Jordanians be reviewed periodically on the basis of labor market needs while maintaining the priority given to employing Jordanians.

The difference between a work permit and a licence to practise a profession should be clarified, and coordination improved between the Ministry of Labor and other ministries, professional associations, and professional bodies, so that the requirements are clear to the worker.

It is also recommended that a limited, regulated pathway be examined to allow non-Jordanian students to work under specified conditions, if analysis of the labor market and the residency framework shows this to be feasible, so as to reduce recourse to irregular work without harming the priority given to employing Jordanians.

Relevant bodies: Ministry of Labor, Ministry of Education and Human Resource Development, Accreditation and Quality Assurance Commission, and the ministries, professional associations, and bodies that regulate professions.

5. Strengthen Decent Working Conditions and Social Protection

It is recommended that the documentation of employment relationships be strengthened through clear, understandable contracts that specify wages, working hours, overtime conditions, leave, the nature of the job, and permitted deductions.

Suitable models should be examined for documenting seasonal, daily, and flexible work, along with extending social security coverage where the law applies while considering more appropriate mechanisms for those with irregular patterns of work.

Wage protection, occupational safety and health, non-discrimination, and protection from harassment must remain core elements in assessing the quality of work rather than limiting the assessment to whether a work permit exists.

Relevant bodies: Ministry of Labor, Social Security Corporation, and employers and their representative bodies.

6. Strengthen Inspection, Complaints, and Protection from Exploitation

It is recommended that the inspection function be strengthened so that it clearly combines policing labor market violations with detecting the abuses that workers face.

Inspectors and the competent bodies should be trained to recognise indicators of severe exploitation and trafficking, such as document retention, threats, withholding of wages, coercion, and restrictions on the ability to leave work, with a clear referral pathway to the competent protection bodies.

It is also recommended to:

- Strengthen oversight of recruitment agencies, intermediaries, and deductions from workers' wages;
- Provide safe, confidential, and easy-to-use complaint channels;
- Protect workers from retaliation for filing complaints;
- Improve access to legal aid;
- Ensure that a worker's permit status does not prevent them from claiming their labor rights;
- And to take account of women's needs in cases of harassment, violence, and exploitation.

Relevant bodies: Ministry of Labor and its Inspection Directorate, Ministry of Interior, Public Security Directorate, Anti-Trafficking Unit, Ministry of Justice, and legal aid providers.

7. Develop Monitoring Based on Actual Outcomes

It is recommended that monitoring of refugee employment policies should not be limited to the number of work permits issued or inspection campaigns carried out, but should include indicators that measure actual outcomes, most importantly:

- The move from irregular to lawful work;
- The proportion of workers with written contracts;
- Social protection coverage;
- Regular payment of wages;
- Continued use and renewal of permits;
- The number of complaints that ended with rights restored or disputes settled;
- And cases of exploitation detected and referred to protection bodies.

It is also recommended that these indicators be reviewed periodically by nationality, gender, age, and other relevant variables within the limits of data protection and non-discrimination.

Relevant bodies: Ministry of Labor, Ministry of Interior, Social Security Corporation, Government Human Rights Coordinator, and relevant national bodies.

Summary of Recommendations

The study's findings do not call for opening the labor market without controls or creating an entirely separate system for refugees. They call for making the existing framework clearer, more usable, and better integrated across residency, work, and protection.

The priority is to narrow the gap between the existence of a lawful pathway and the actual ability to use it, helping to reduce informal work, improve oversight of employment conditions, and strengthen protection from exploitation, while maintaining the priority given to employing Jordanians and the requirements of the national labor market.

The most realistic reform is a gradual one. It begins with the most feasible measures, such as standardising information, simplifying pathways, improving institutional coordination, and making complaints and inspection safer, then assesses the need for broader legal amendments based on the results of implementation.

Annexes

Annex 1: Quantitative Survey Instrument

Introduction and consent to participate

Hello! My name is [researcher's name], and I work with the Information and Research Center – King Hussein Foundation, a Jordanian national organisation. We are currently working with a team of researchers to study labor rights and protection for refugees in Jordan. The survey covers 200 refugees of different nationalities (Syrian, Iraqi, Yemeni, and Palestinian), both men and women, living in Jordan. It documents access to lawful work, involvement in informal work, accumulated residency fines, and possible violations of their labor rights along with the related protective mechanisms. The survey is designed to generate quantitative evidence on the structural drivers of vulnerability, with the aim of proposing reforms grounded in the lived reality of those most affected.

I would like to conduct a short interview that will take no more than 20 minutes. Your participation is entirely voluntary, and all the information you give will remain confidential and will be used only for research purposes. Taking part or not taking part will not affect your access to any services or assistance. You have the right to refuse to take part, or to withdraw from this study at any time, without any consequences.

Respondent's Name: ……

Section 1: Basic Information

A. Demographic Data

1. **Sex:**
   - Male
   - Female
2. **Age:**
   - 18–24 years
   - 25–34 years
   - 35–44 years
   - 45–54 years
   - 55 years and over
3. **Nationality:**
   - Syrian
   - Iraqi
   - Yemeni
   - Gazan

4. **Marital Status:**
   - Single
   - Married
   - Divorced
   - Widowed

5. **Highest Level of Education:**
   - No education
   - Primary
   - Preparatory/intermediate
   - Secondary
   - Diploma
   - Bachelor's degree
   - Postgraduate

6. **Place of Residence in Amman:**

7. **What year have you been in Jordan since?**

Section 2: Legal Status and Administrative Barriers

1. **Which documents do you currently hold? (More than one answer allowed)**
   a. Passport for non-Jordanians
   b. Residence permit from the Ministry of Interior
   c. Work permit
   d. Identity card without a Jordanian national number (e.g. Syrian identity card)
   e. Asylum document/file issued by UNHCR
   f. Temporary Jordanian passport – for the West Bank and Gaza Strip
   g. White card for Gazans
   h. Identity card for children of Jordanian women
   i. Other, specify ……

2. **Do you have accumulated residency fines?**
   - Yes
   - No
   - Don't know

3. **Do you currently hold a valid work permit?**
   - Yes
   - No
   - Not applicable

4. **If so, what type of work permit?**
5. **If you do not have a work permit, what is the main reason? (More than one answer is allowed)**
    - Cost of the work permit
    - Employer refused to issue the permit
    - Lack of information
    - Restrictions on sectors or professions
    - Fear of losing assistance or an asylum claim
    - Problems with documents
    - Residency fines
    - Difficult permit procedures
    - Employer prefers informal arrangements
    - Other reasons, please specify: ……
6. **Do you avoid going to government offices for fear of detention, being held accountable for issues, or expulsion? (1=Yes, 2=No)**
7. **Have you ever been detained or held for any of the following reasons? (You may choose more than one answer)**
    - No valid work permit
    - No valid residency
    - Working in a sector not permitted
    - Police patrol
    - Other reasons (specify ……..)
8. **Does your legal status affect your ability to find or stay in jobs? (1=Yes, 2=No)**
9. **Do you have enough knowledge of the procedures required to obtain or renew a work permit? (1=Yes, 2=No, 3=To some extent)**
10. **Have you had difficulty providing the documents required to obtain services or permits? (1=Yes, 2=No)**

If "yes":

11. **Which documents are difficult for you to provide? (More than one answer is allowed)**
    - Passport
    - Rental contract
    - Medical clearance certificate
    - Personal photographs
    - National number/ID
    - Documents from the employer
    - Other

12. **Have you had difficulty using government online platforms? (1=Yes, 2=No, 3=Have not used them)**

If "yes":

13. **What difficulties did you face?**
    - Poor internet connection
    - No smartphone
    - Not understanding the steps
    - Suitable language not available
    - Technical problems
    - Other

14. **Does obtaining your work permit require the approval of your current employer? (1=Yes, 2=No, 3=Don't know)**

If "yes":

15. **Has an employer ever refused to issue or renew a work permit for you? (1=Yes, 2=No)**
16. **Are the costs of government procedures (such as permit fees, medical tests, transport) a barrier for you? (1=Yes, 2=No)**
17. **Do you think the length of government procedures affects your ability to work or move around? (1=Yes, 2=No)**
18. **Have you had to use an intermediary or another person to complete government procedures? (1=Yes, 2=No)**

If "yes":

19. **What is the main reason that you relied on an intermediary? (1=Not understanding the procedures, 2=Lack of time, 3=Fear of rejection, 4=Difficulty of access, 5=Other reasons)**

Section 3: Working conditions

20. **What is your current work arrangement?**
    - I work full-time
    - I work part-time
    - I work seasonally
    - I work on a daily basis
    - I work to order or by the piece
    - I used to work, but am now looking for work

21. **What work do you currently do?**

22. **Does your current work match your skills?**
    - Yes
    - No

23. **Average Monthly Income:**
24. **Average Weekly Working Hours:**
25. **When did you start your current job? (month and year)**
26. **Do you have a written employment contract?**
    - Yes
    - No

If "yes":

27. **Do your actual working conditions match what is stated in the contract?**
    - Always
    - Sometimes
    - No

28. **Are you covered by social security?**
    - Yes
    - No

29. **If not, why?**
30. **Do you have health insurance?**
    - Yes
    - No

31. **Do you feel you have equal opportunities to find work compared with Jordanians? (1=Yes, 2=No) |____|**
32. **Do sectoral restrictions prevent you from working in the profession you are skilled in? (1=Yes, 2=No, 3=Don't know)**
33. **Do labor laws in Jordan prevent you from working in the profession you are skilled in? (1=Yes, 2=No, 3=Don't know)**
34. **Do the rules of professional associations and trade unions in Jordan prevent you from working in the profession you are skilled in? (1=Yes, 2=No, 3=Don't know)**

Section 7: Complaints and Access to Justice

35. **In the past twelve months, have you experienced any of the following? (More than one answer is allowed)**

Situation	Yes	No
Delayed wages	□	□
Unpaid wages	□	□
Working more than 8 hours	□	□
Denied leave	□	□
Unsafe working conditions	□	□
Verbal abuse	□	□
Discrimination	□	□
Harassment	□	□
Document retention	□	□
Threats or intimidation	□	□
Work injury	□	□

36. **Have you submitted reports for any of the labor violations above?**
    - Yes
    - No

37. **If you chose not to report, why not? (You may choose more than one answer)**
    - Fear of the employer
    - Fear of expulsion or penalties
    - Lack of information
    - Language barrier
    - Lack of trust in the competent authorities
    - Cost
    - Other reasons

38. **Do you know where you can get legal aid if you need it? (1=Yes, 2=No)**

39. **If you did report any of the situations above or considered reporting them, where would you go to make a complaint or find a solution? (You may choose more than one answer) 0= Nowhere / I would not try to resolve it / there is nowhere to go / no hope of resolving it**

1= A co-worker

2= Direct manager

3= Human resources officer

4= Employer

5= Professional association or trade union

6= Ministry of Labor

7= Police

8= Lawyer

4= Local or international civil society organisation (e.g. UNHCR)

5= Local court, such as [Magistrates' Court]

6= Mediator, arbitrator, adviser, or "alternative dispute resolution" service

8= Family members

11= Political leaders, including members of parliament, local government advisers, and others

12= Government official

13= Don't know

14= Other, specify_____

40. **How satisfied are you with the outcome of the complaint, or how confident are you that the legal system would treat your complaint fairly?**

- Very satisfied or confident
- Somewhat satisfied or confident
- Not satisfied or not confident

This is the end of our survey. Thank you very much for your time.

Annex 2: Focus Group Discussion Guide

The focus group discussion guide (FGD Guide) aims to produce in-depth, qualitative evidence on the legal situation and working conditions of Syrian, Iraqi, Yemeni, and Gazan refugees in Jordan. It focuses on assessing refugees' situation in regards to access to work, work permits, residency, working conditions, access to justice, discrimination, and protection from exploitation.

General Information

Number of Participants per Group: 8-10 participants

Session Length: 75 – 90 minutes

Sessions Held:

- A group of Syrian men
- A group of Syrian refugee women
- A group of Iraqi refugee men
- A group of Iraqi refugee women
- A group of Yemeni refugee men
- A group of Yemeni refugee women
- A group of Gazan refugee men
- A group of Gazan refugee women

I. Introduction

Welcome, and thank you for taking part today.

We are holding this session to understand the experiences of refugees working in Jordan and to learn about the challenges they face at work, in obtaining permits, services, and legal protection. There are no right or wrong answers; what matters to us is hearing your own experiences and views.

All the information you share will remain confidential and no names or personal details will be mentioned in the final report.

Opening Question

- **Briefly introduce yourself:**
  - Your current or previous job
  - How long you have lived in Jordan

Theme 1: Work Permits, Residency, and Government Procedures

Key Questions

1. Tell us about your experience obtaining or renewing a work permit.
2. Which procedures did you find most difficult?
3. What costs do you bear to obtain or renew permits?
4. Do your residency situation or any accumulated fines affect your ability to work?

Follow-Up Questions

- Did you need help from someone like an intermediary to complete the procedures?
- Do you know all the steps required to obtain a work permit?
- Do the procedures differ between Syrians and non-Syrians?
- Have you had difficulty using government online platforms?

Analytical Aim: To understand the actual impact of the administrative and legal framework on refugees' ability to work lawfully.

Theme 2: Dependence on the Employer and Power Relations

Key Questions

1. How far does keeping your job depend on the employer?
2. Have you ever needed an employer's approval to obtain or renew work-related documents?
3. Do you feel that employers have a lot of power over refugee workers in comparison with Jordanian workers?

Follow-Up Questions

- Does fear of losing your job lead you to accept unsuitable working conditions?
- Have you ever hesitated to claim your rights for fear of losing your job?

Analytical Aim: To explore relationships of dependency in legal and administrative status.

Theme 3: Working Conditions and Decent Work

Key Questions

1. Describe the working conditions in the work you do now or have done before.
2. Do you receive your wages in full and on time?
3. What are your working hours like?
4. Do you have written employment contracts?
5. Are you covered by social security or health insurance?

Follow-Up Questions

- Do you feel safe at work?
- Have you had work-related injuries?
- Have you had leave or basic labor rights?
- Do working conditions differ between sectors?

Analytical aim: To assess how far decent work and social protection standards are met.

Theme 4: Violations and Exploitation at Work

Key Questions

1. **What are the most common kinds of problems or violations that working refugees face?**
2. **Have you heard of or experienced cases of:**
   - Delayed wages?
   - Unpaid wages?
   - Long working hours?
   - Confiscation of documents?
   - Threats or intimidation?
   - Harassment or abuse?
3. **Why do you think some employers exploit refugee workers?**

Follow-Up Questions

- Do you think legal status makes some refugees more likely to be exposed to exploitation?
- Are some groups more vulnerable than others?

Analytical Aim: To understand the relationship between legal status and exposure to exploitation and violations.

Theme 5: Access to Justice and Complaint Mechanisms

Key questions

1. If you have a problem at work, what do you usually do?
2. Do you know which bodies you can turn to in order to make a complaint?
3. Do you trust the official bodies to deal with a complaint fairly?

Follow-Up Questions

- What stops refugee workers from making complaints?
- Does fear of expulsion or of being held accountable for issues stop people from claiming their rights?
- Has an official body or an organisation ever helped you resolve a work-related problem?

Analytical Aim: To understand the practical gaps in access to justice and remedy.

Theme 6: Refugee Women and Work (for use in women's groups)

Key Questions

1. What particular challenges do refugee women face at work?
2. Are there barriers linked to childcare or family care?
3. Do women face risks or forms of exploitation that differ from those men face?

Follow-Up Questions

- Harassment or abuse in the workplace.
- The wage gap.
- Domestic or informal work.
- The ability to make complaints.

Analytical aim: To bring a gender-specific perspective into the analysis of the study's findings.

Theme 7: Recommendations

Closing Question

1. What one measure would most improve the situation of working refugees?

Then hand out leaflets containing brief information.

Annex 3: Research Interview Guide for the Director of the Migrant Workers Directorate at the Ministry of Labor

Interview Instrument for Riyad Barham – Director of the Migrant Workers Directorate at the Ministry of Labor

Aim of the interview: To clarify the legal and procedural framework governing the work of non-Jordanians in Jordan, focusing on Syrians, Iraqis, Yemenis, and Gazans refugees, and to verify issues that emerged in the field research findings on work permits, inspection, deportation, complaints, and some exploitation risks.

Introduction and Consent

Thank you for taking part. This interview aims to clarify the procedures that govern the work of the non-Jordanian groups covered by the study. The information will be used for research purposes. Participation is voluntary. Do you agree to take part and to the interview being audio-recorded for documentation and analysis?

I. Institutional Role and General Framework

1. Please describe your position and responsibilities for the non-Jordanian labor portfolio.
2. How does the Ministry of Labor treat Syrians, Iraqis, Yemenis, and Gazans in legal terms?

Probes: Are they all treated as non-Jordanians? • Does every non-Jordanian need a work permit? • What are the exceptions to the permit requirement?

3. What are the basic conditions for an employment relationship and for issuing a work permit to a non-Jordanian?

Probes: The worker's relationship with the employer • Wages and subordination • The difference between an employment relationship and the kafala (sponsorship) system

II. Rights and Complaints

4. Can a non-Jordanian worker claim their labor rights or go to court if they are working without a permit or with an expired one?

Probes: Does permit status affect entitlement to wages or other rights? • Does filing a complaint itself lead to the worker being apprehended or to action being taken against them?

5. What complaint channels are available to non-Jordanian workers and can complaints be made confidentially?

Probes: Online complaints • The option of filing by phone • How does the Ministry address workers' fear of losing their jobs because of a complaint?

6. What is the scope of the inspection teams' work?

Probes: Is inspection limited to work permits, or does it cover wages, working conditions, and labor rights? • How are complaints from employers or workers about an inspector's conduct reviewed? • How are audio and video recording used during inspections?

III. Inspection and Measures Against Violators

7. What is the procedure for when a worker is found working without a permit or with an expired permit?

Probes: Measures against the employer • Measures against the worker • The difference between a regular inspection visit and a joint security campaign • Does a labor inspector have the power to detain a worker?

8. What is the difference between deportation and removal, and which body is competent to issue and carry out each decision?

Probes: The role of the Ministry of Labor • The role of the Ministry of Interior • Are there cases in which a person is exempt for reasons of nationality, family, or humanitarian circumstances?

9. How is a worker held for deportation dealt with, especially if they cannot pay for the travel ticket?

Probes: Length and place of waiting • Funds allocated for tickets • Shelter arrangements and the roles of the Ministry of Interior, the Ministry of Social Development, and the Ministry of Labor

10. How are status regularisation campaigns carried out?

Probes: Length of the grace period • Exemptions from fines and fees • Consequences of not regularising one's status • Take-up compared with previous periods

IV. Activities, Professions, and Types of Permits

12. How does the Ministry decide which activities, establishments, and professions are allowed to employ non-Jordanian workers?

Probes: Eligibility conditions for establishments • Permitted professions • Ratios of Jordanian to non-Jordanian employees • Are the rules the same for all nationalities?

13. What types of work permit have been discussed and how do they differ?

Probes: The ordinary or unified permit • The flexible permit • The self-employment ("free") permit • The temporary permit • Links to the employer, profession, or sector • Duration and fees

14. What special arrangements apply to Syrians' work permits?

Probes: Short-term temporary permits • The flexible permit and the group of professions it covers • Fee exemptions • Moving between sectors or employers • Simplified rules of origin

V. Differences Between the Groups Covered by the Study

15. How do work or deportation procedures differ between Syrians, Iraqis, Yemenis, and Gazans, and what is the basis for these differences?

16. For Iraqis, what is the relationship between the work permit, residency, and registration with UNHCR?

Probes: Is there a direct relationship between the Ministry of Labor and UNHCR? • When does the Ministry of Labor request the Ministry of Interior's approval? • Do Iraqis have facilities similar to those granted to Syrians?

17. For Yemenis, what are the procedures relating to the work permit, residency, and deportation?

Probes: When is a deportation decision issued or its enforcement suspended? • What is the Ministry of Interior's role?

18. For Gazans, what are the rules on work permits?

Probes: Fee exemption • Permitted professions and sectors, and the need for a licence to practise • The difference between working in the private sector and the government sector

VI. Permit Duration, Fines, and Students

19. What is the usual duration of a work permit, and what exceptions allow shorter or longer permits?

Probes: Temporary permits for Syrians • Permits for people with specialised skills • The possibility of issuing a permit for two years

20. How are fines or fees for past periods calculated for someone who later applies to regularise their status?

Probes: The period in which the person was a student • The period in which they were under eighteen • The effect of holding residency for a purpose other than work

21. What policy applies to a non-Jordanian student who wants to work while studying, and what is its rationale?

Probes: Can they obtain a work permit? • Are there exceptions?

VII. Intermediaries and Exploitation Risks

22. How does the Ministry deal with cases in which a company or intermediary supplies workers to other establishments, such as cleaning and hospitality companies, or work in hospitals and event halls?

Probes: Who counts as the actual employer? • May migrant workers be employed under government tenders or in government establishments? • What are the responsibilities of the company, the benefiting establishment and the intermediary?

23. How can an intermediary who deducts part of workers' wages, mistreats, or employs those under eighteen be reported?

Probes: The role of complaints and electronic inspection • When does a case call for referral to a body competent for trafficking? • How can a worker who fears losing their income be protected?

VIII. Gender and Particular Groups

24. Are there differences between women and men in the conditions for issuing work permits or in the professions open to them?

Probes: Work that is hazardous or closed to women • Male and female domestic workers

25. Is there a rule that prevents Yemeni women from obtaining work permits or that ties a woman's permit to her husband's or family's status?

Probes: How does the Ministry verify the family relationship? • Is the problem linked to residency data held by the Ministry of Interior?

26. What is the position of children of Jordanian women who hold the identification card with regard to the work permit requirement?

27. How does the Ministry deal with employers who make workers bear the cost of a fine, or recover it by deducting it from their wages?

Probes: Have there been complaints of this kind? • How can they be proved?

IX. Work in the Public Sector and Official Information

29. May a non-Jordanian work in the public sector? What are the limits of the Ministry of Labor's competence in this area?

Probes: The role of the Civil Service Regulation or the Human Resources Management Regulation • Cases linked to international cooperation or universities • The position of Gazans in the government sector

29. What is the official reference that governs the procedures for issuing work permits to non-Jordanian labor?

30. Is there any other important information or issue relating to the work of non-Jordanians that we have not covered?

Annex 4: The Legal Framework for Refugee Work in Jordan: A Study of the Regulation of Syrian, Iraqi, Yemeni, and Palestinian Labor – Prof. Hamdi Al-Qbeilat

Introduction:

The work of migrant workers in Jordan is subject to a strict legal framework that balances protecting the national workforce against meeting the needs of the Jordanian labor market. The framework rests mainly on the Jordanian Labor Law No. 8 of 1996, as amended, together with the Residence and Foreigners' Affairs Law No. 24 of 1973 and the regulations, instructions, and regulatory decisions issued by the Ministry of Labor.

It should be noted that information on migrant labor in Jordan is severely lacking, because it is scattered among the official bodies responsible for dealing with migrant workers and regulating their entry into, work in, and departure from the Kingdom. The only accurate and reliable data is on migrant workers holding work permits, which the Ministry of Labor issues under its legal powers. These show that about 315,000 migrant workers held work permits at the end of 2025. The number of migrant workers in the Kingdom, however, is estimated at about 1.57 million, of whom, those working in the formal economy do not exceed a quarter.[243]

1. General Legal Framework for the Work of Non-Jordanian Workers and Refugees in Jordan

1. Employment of Migrant Workers

Jordan is among the countries that rely relatively heavily on migrant labor (non-Jordanian workers), despite the high unemployment rates in the Jordanian labor market: unemployment among Jordanian men and women aged 15 and over reached 21.2% in the last quarter of 2025.[244] There are many reasons for this, among them the mismatch between educational outcomes and the labor market, and the physical build of migrant workers, which suit many labor-intensive sectors such as construction and agriculture. Migrant labor has thus become one of the main components of the Jordanian labor market.

243. Rida Yassin, "[Jordan halts recruitment of migrant labor: will citizens fill the gap?]", Al Jazeera Net, 31 May 2025, accessed 30 May 2026.
244. Jordan News Agency (Petra), "[Statistics: Unemployment rate for the Kingdom's total population falls to 16.1%]", 2 April 2026, citing the Department of Statistics.

The Jordanian government has taken several measures to reduce the number of migrant workers in fields where they may compete with Jordanian workers.[245] Despite its attempts to replace migrant labor with Jordanian labor, it has succeeded only to a limited extent, and the occupations in which migrant workers are mostly employed are unattractive to Jordanians or do not match their qualifications. In the absence of decent working conditions and environments, with weak protection for all workers, Jordanian and non-Jordanian alike, and with the imbalances in education policy left unaddressed, which have left tens of thousands of graduates piled up in specialisations the labor market does not need, the labor market will continue to draw heavily on migrant labor.

Article 23 of the Jordanian Constitution of 1952, as amended, sets out the legal provisions that national labor legislation must contain. It requires the country to enact legislation based on a number of principles concerning workers' wages, weekly working hours, weekly and annual rest days, compensation in cases of dismissal, sickness and disability, conditions of work for women and juveniles, weekly and annual rest days, health rules, and trade union organisation.

Article 2 of the Labor Law defines 'worker' without distinguishing between Jordanian and non-Jordanian workers as regards the application of the Law and the privilege of the rights and protections it guarantees, except in specific cases where it excludes migrant workers from certain rights. These include the requirement that the founder of any workers' trade union or employers' association hold Jordanian nationality and giving the General Federation of Jordanian Trade Unions (GFJTU) the power to set the conditions and procedures for workers' membership of trade unions and for standing in their elections.

Article 12 of the Labor Law also sets the legal controls on employing non-Jordanian workers. No non-Jordanian worker may be recruited or employed without the approval of the Minister of Labor or his delegate, provided that the work requires expertise and skills not available among Jordanian workers, or that the number of available Jordanian workers does not meet the need. The Minister issues the necessary instructions for this purpose, which must include the occupations in which non-Jordanian workers are prohibited from working, the ratios that employers are permitted to employ, and the guarantees employers must provide. A non-Jordanian worker must obtain a work permit from the Minister or his delegate before being recruited or employed. The permit is valid for one year or part of a year, unless the Minister decides that it shall be valid for two years for sectors or activities he specifies in a decision issued for this purpose. On renewal, the permit's term runs beginning on the expiry date of the last work permit the worker obtained.

The Ministry of Labor charges a fee for each work permit it issues or renews for a non-Jordanian worker, including agricultural workers, domestic workers, household cooks, gardeners, and those in similar positions.

245. Claire Escoffier, Pierre Tainturier, Ayman Halasa, Naima Baba and Chadi Sidhom, [Economic and Social Rights of Migrants and Refugees in the Euro-Mediterranean Region: Case Studies – France, Jordan, Morocco] (Euro-Mediterranean Human Rights Network, 2008), 60.

The following are determined by a special regulation:

1. The amount of the fees (Regulation No. 142 of 2019 on Work Permit Fees for Non-Jordanians, as amended).
2. The types of work permit the Ministry issues and the provisions governing them.
3. The fines imposed on workers and employers who commit violations.

An employer, and anyone who employs or mediates in the employment of a non-Jordanian worker in breach of the Law, shall be punished by a fine of not less than twice the work permit fees and charges for the sector in which the worker was caught; for a repeat offence, the fine becomes four times those fees and charges. The same penalty applies to an employer in whose name the work permit was issued who failed to notify the Ministry that the worker had left their employment before the worker was caught working for another employer.

Children of Jordanian women married to non-Jordanians who reside in the Kingdom are exempt from obtaining the work permits provided for above.

Employing a non-Jordanian worker in any of the following cases constitutes a violation of this Law:

1. Employing the worker without a work permit, or with a work permit that has been expired for no more than ninety days.
2. Employing the worker with an employer other than the one they are permitted to work for, unless they have obtained permission to do so from the competent unit in the Ministry.
3. Employing the worker in an occupation other than the one they are permitted to work in.

The Minister shall issue a decision to deport the non-Jordanian worker from the Kingdom in any of the following cases:

a. The worker's violation of the provisions of this Article, including a worker whom the Ministry has established to have left work with their employer.
b. Anyone working without a licence or permit in accordance with the legislation in force.

The deportation decision is carried out by the competent authorities at the expense of the violator with whom the worker was caught, and a deported non-Jordanian worker may not be recruited or employed again until at least five years have passed from the date the deportation decision was carried out.

This provision is general and sweeping, and does not take into account that a foreigner may have a special legal status, such as refugee status. Deporting them may for them to return to the country they originally fled for fear of persecution, which would breach the principle of non-refoulement, the cornerstone of refugee law.[246]

The Labor Law distinguishes a 'recruited' worker and an 'employed' worker. Under the definitions in Article 2 of the Instructions on the Conditions and Procedures for Employing and Recruiting Non-Jordanian Workers of 2012, as amended, a recruited worker is 'a non-Jordanian worker who entered the Kingdom under an employment contract for the purpose of work', while an employed worker is 'a non-Jordanian worker present inside the Kingdom'.

2. Entry Visa

Entry of non-Jordanian workers into the Kingdom is governed in principle by obtaining a visa permitting entry, within the types and controls set by the Visa Regulation No. 3 of 1997, as amended. However, Article 3(a) of the Regulation exempts what is provided for in agreements between Jordan and other countries on this matter, which allow nationals of those states to enter the Kingdom without a visa or prior approval from the Ministry of Interior.[247]

3. Residency Permit

While some migrant workers are not required to obtain a residency permit from the Ministry of Interior, under the exception in Article 29(f) of the Residence and Foreigners' Affairs Law No. 24 of 1973, as amended, Article 3 of the Regulation on Designating Place of Residence No. 95 of 1998, as amended, requires anyone who employs and houses a foreigner in any way, or who rents out property, designating the foreigner's place of residence according to the procedures in Article 3 of the Instructions on Designating the Place of Residence of Non-Jordanians of 2019, as amended. The landlord, the employer, or anyone who has housed a foreigner in any way, does this by submitting an application to designate place of residence, on the form prepared for this purpose, to the competent police station, accompanied by the following documents:

1. A copy of the identity card or passport of the landlord, the employer, or anyone who has housed a foreigner in any way, or of the owner of the furnished flat or the person authorised to sign on behalf of the legal person, as the case may be;

246. Ayman Adeeb Halasa, "[The Legal Status of the Non-Palestinian Refugee in Jordan]", Mu'tah Lil-Buhuth wal-Dirasat: Humanities and Social Sciences Series 21, no. 2 (2006): 230.

247. Article 3 of Visa Regulation No. 3 of 1997, as amended, provides: "a. Subject to the agreements concluded between the Hashemite Kingdom of Jordan and other states, visas shall be of the following types: 1. A visit visa to the Kingdom for a single journey or multiple journeys. 2. A transit visa through the territory of the Kingdom for a single journey or multiple journeys. 3- A visa for the purpose of work in the Kingdom. 4- A visa for the purpose of tourism in the Kingdom. 5- A visa for the purpose of medical treatment in the Kingdom. 6- A visa for the purpose of study in the Kingdom. 7- An exit and return visa to the Kingdom. b. The visas provided for in paragraph (a) of this Article, issued by the Ministry and by Jordanian diplomatic missions abroad, shall be valid for entry into the territory of the Kingdom within three months if the visa is for a single journey, and for three months, six months, one year, or five years if the visa is for multiple journeys, as the case may be."

2. A copy of the foreigner's passport;

A copy of the lease for the property or furnished flat. Migrant workers who live at their workplace are exempt from this; instead, the sponsor signs an undertaking that the migrant worker works for them, and the form prepared for designating accommodation must be filled in accurately;

A copy of any document proving ownership of the property or furnished flat.

In addition to the documents above, when the place of residence changes, the application to designate it must be accompanied by any of the following:

1. A copy of a valid residency permit, for those to whom the Residence and Foreigners' Affairs Law in force applies;
2. A copy of a valid work permit, for those residing in the Kingdom for work who are not subject to the Residence and Foreigners' Affairs Law in force;
3. A copy of valid proof of student status, for those residing in the Kingdom to study who are not subject to the Residence and Foreigners' Affairs Law in force.

The Ministry of Interior distinguishes between two types of nationality: **first, 'nationalities not subject to residency restrictions',** namely Egyptian and Syrian nationals, Palestinians holding green cards, holders of the white cards issued to Gazans, and holders of temporary Jordanian passports; **and second, 'nationalities subject to residency restrictions',** namely all other Arab and non-Arab nationalities. Nationalities not subject to residency restrictions are not required to obtain a residency permit from the Ministry of Interior, but a person seeking residency must designate their place of residence at a police station, under the Regulation on Designating Place of Residence No. 95 of 1998, as amended.

Under Article 16(a) of the Residence and Foreigners' Affairs Law No. 24 of 1973, as amended, 'No Jordanian national, company, or body may employ a foreigner unless they hold a residency permit in the Kingdom, with the exception of experts brought in for practical or technical purposes whose period of work does not exceed three months.' Under Article 18 of the same Law, 'Every foreigner residing or wishing to remain in the country must hold a residency permit in accordance with the provisions of this Law, and must leave the Kingdom when the residency permit expires unless they have renewed it.' And under Article 9, 'The Minister (the Minister of Interior), after consulting the Director, has the right to accept or reject a foreigner's application for a residency permit, or to cancel a residency permit granted to them and require them to leave the Kingdom, without providing reasons.' An irregular migrant worker, that is, one in breach of the Residence Law, is often arrested and detention may be prolonged if they

cannot pay overstay fines. According to officers in the Public Security Directorate, one night in a detention centre costs the Jordanian government 22 dinars, which means the government loses 20.5 dinars for every night a migrant worker is held,[248] given that the late fee was one and a half dinars a day, before the Law was amended and it became three dinars a day.[249]

4. Jordan's Position on International Conventions and Treaties Relating to MigrantLabor.[250]

Jordan has acceded to a number of international conventions, charters, instruments, and protocols that directly or indirectly contain provisions relating to migrant labor, a fair number of which have been reflected in the drafting of national laws. These include Jordan's obligations under the principles set out in the Universal Declaration of Human Rights, adopted in 1948, and the conventions and covenants issued in light of the Declaration and ratified by Jordan, which form a comprehensive and legally binding system for promoting and protecting human rights and combating human trafficking. Among them are the International Covenant on Civil and Political Rights of 1966 and the International Covenant on Economic, Social, and Cultural Rights of 1966, both ratified by Jordan in 1975, after it had ratified the International Convention on the Elimination of All Forms of Racial Discrimination of 1965 in 1974.

However, Jordan has not yet ratified the two Optional Protocols to the International Covenant on Civil and Political Rights, nor a number of conventions relating to migrant workers and refugees, in particular, the International Convention on the Protection of the Rights of All Migrant Workers and Members of Their Families of 1990. That Convention sets out guarantees and rights that states parties must uphold for all migrant workers and members of their families, whether the family members migrated with them, joined them later, or were born in the host country, and whether they reside in the host country, a transit country, or entered without permission or official papers. The Convention recognises rights and guarantees for irregular workers and extends all the rights and guarantees owed to migrant workers in the host country. Nor has Jordan ratified the Convention relating to the Status of Refugees and its 1967 Protocol, the Convention relating to the Status of Stateless Persons of 1954 or the Convention on the Reduction of Statelessness of 1961. It did, however, conclude a Memorandum of Understanding with UNHCR setting the terms of cooperation on refugees and asylum seekers, in 2008 and 2014.

248. Tamkeen for Legal Aid and Human Rights, [Between the Hammer and the Anvil: Migrant Workers Caught between Employer Abuse and Official Practices – The Situation of Domestic Workers and Egyptian Workers] (Amman: Tamkeen for Legal Aid and Human Rights, 2012), 36.

249. Article 34(a) of Residence and Foreigners' Affairs Law No. 24 of 1973, as amended, provides: "Any foreigner who has entered the Kingdom lawfully and has not obtained temporary residence, or has overstayed the residence granted to him, or has not applied to renew his annual residence permit within one month of its expiry, shall be fined ninety dinars for each month of overstay or part of a month, at the rate of three dinars for each day of that part."

250. Jordanian Center for Labor Rights "Workers' House", [The Jordanian Legislative Framework for Migrant Workers' Rights: The Right to Organise, Social Security, Occupational Safety and Health, Labor Inspection – Agricultural and Domestic Workers as a Case Study] (National Campaign for an Alternative Labor Migration System in Jordan, 2023), 19 ff.

As for ILO conventions, since joining the ILO in 1956, Jordan has ratified 26 of the 190 conventions adopted by the International Labor Conference, which address labor matters from many angles. They include 7 of the eight fundamental conventions representing the Organization's four core objectives under the Declaration on Fundamental Principles and Rights at Work of 1998, among them: the Freedom of Association and Effective Recognition of the Right to Collective Bargaining Convention (No. 87), the Forced Labor Convention (No. 29), the Worst Forms of Child Labor Convention (No. 182), and the Discrimination (Employment and Occupation) Convention (No. 111).

Jordan has not ratified several conventions that deal with migrant workers' affairs and rights, along with the regulation of their work, in particular Convention No. 189 of 2011 on decent work for domestic workers, Convention No. 143 of 1949 on migrant workers, Convention No. 181 of 1997 on employment agencies, the Labor Inspection (Agriculture) Convention No. 129 of 1969, the Occupational Safety and Health Convention No. 155 of 1981, and the Promotional Framework for Occupational Safety and Health Convention No. 187 of 2006.

5. The Legal Status of Refugees in Jordan

Jordan has no legislation specific to refugees, although some scattered legal provisions deal with asylum and how it is handled. A refugee is, by nature, a foreigner and as such has the special legal status that legislation on foreigners grants.[251] The legal status of refugees in Jordan is determined by the 'principle of temporary protection', adopted administratively and judicially: Jordan avoids using the term 'refugee' in its strict international legal sense because it has not signed the 1951 Geneva Refugee Convention. Instead, legal status is managed through the Memorandum of Understanding signed between the Government of Jordan and the United Nations High Commissioner for Refugees (UNHCR) in 1998, as amended, which secures the Kingdom's commitment to the principle of non-refoulement and to providing legal and humanitarian protection to refugees as temporary 'asylum seekers'.

The Memorandum of Understanding adopted the definition of "refugee" in the 1951 Convention relating to the Status of Refugees. Article 1 states that 'for the purposes of this Memorandum of Understanding, a refugee is defined as follows: a refugee is a person who, owing to a well-founded fear of being persecuted for reasons of race, religion, nationality, membership of a particular social group or political opinion, is outside the country of his nationality and is unable or, owing to such fear, unwilling to avail himself of the protection of that country; or who, not having a nationality and being outside the country of his former residence, is unable or, owing to such fear, unwilling to return to it.'

In the absence of a national asylum law, refugees are subject to the general legislation applicable to foreigners, with some regulatory exceptions:

The Residence and Foreigners' Affairs Law No. 24 of 1973, which requires foreigners to follow the official residency procedures, but refugees registered with UNHCR are given a different status, based on the Memorandum of Understanding, that protects them from detention or prosecution on a charge of 'illegal entry'. Article 29 of the Residence Law lists categories of persons to whom the Law's provisions do not apply, among them those in paragraph (h): anyone that the Minister of Interior sees fit to exempt for reasons of international courtesy,

251. Halasa, [The Legal Status of the Non-Palestinian Refugee in Jordan], 4.

humanitarian considerations, the right of political asylum, or reciprocity. It follows from this provision that the Minister of Interior has the power to exempt a refugee from the Law's provisions and has discretion in doing so; in other words, a foreigner's refugee status does not necessarily exempt them from the Residence Law.

Additionally, Article 7(d) of the Visa Regulation No. 3 of 1997, which gives the Minister of Interior the right to exempt any person from the fee for an entry visa to the Kingdom for reasons of international courtesy, humanitarian considerations, the right of political asylum, reciprocity, or any other consideration he deems appropriate. The Minister's decision is final.

Special service document (the security card): for Syrian refugees, the Jordanian Ministry of Interior has adopted the 'security card' as the basic identity document, giving its holder a semi-stable legal status that allows access to services.

6. Refugees' Right to Work in Jordan

The Memorandum of Understanding signed between the Government of Jordan and UNHCR in 1998 provides for the physical and legal protection of refugees and guarantees them protection from refoulement. Refugee cards issued by UNHCR, like the service cards for Syrian refugees issued by the Minister of Interior since 2014, serve as proof of registration and give access to the international and national assistance programmes designed for refugees. On social protection, the Memorandum affirms refugees' right to work in accordance with national legislation, which means refugees working lawfully in the economic sectors that the Ministry of Labor specifies and are open to migrant workers. In practice, however, migrants are allowed to work in Jordan in specific sectors according to labor market needs and a list of occupations set by the Ministry of Labor, such as most work in agriculture, construction, manufacturing, retail, and vehicle repair.[252] But the cost of a work permit is relatively high given their already difficult economic circumstances, which has driven migrants to work without a work permit or any kind of labor market protection in the informal economy.

From their arrival in Jordan until 2016, Syrian refugees were treated in the same way as refugees of other nationalities in general and received the various social protection services available, such as cash and in-kind assistance. At that time, Syrian refugees, like other refugees, were barred from working legally, and the ban continued until 2016, when the London donors' conference was held to ease Syrians' entry into the Jordanian labor market.

The Jordanian Constitution guarantees the right to work to Jordanians only,[253] whereas the Labor Law does not distinguish between Jordanians and non-Jordanians in labor rights. It should be noted that Jordanian legislation makes no specific reference to the right of refugees or asylum seekers to work; they are treated as foreigners like any other, and the law gives them no special legal status in employment.

252. Jordanian Ministry of Labor, "[Employment of Syrian Refugees]", Ministry of Labor website, accessed 24 August 2026.
253. Article 23(1) of the Jordanian Constitution of 1952, as amended: "Work is a right of all citizens, and the State shall provide it for Jordanians by directing and developing the national economy."

Jordanian law **regulates refugees' right to work through the requirement to obtain an official work permit** issued by the Ministry of Labor, and the facilities and sectors available differed substantially between refugees of Syrian nationality and refugees of other nationalities.[254]

The legal and implementing framework for refugee workers' rights can be summarised in the following points:

a. The Legal Status of Syrian Refugees

Permitted Sectors: They may work in specific sectors open to migrant labor, such as construction, agriculture, services, manufacturing, and bakeries.[255]

Closed Professions: They are prohibited from working in the closed professions reserved for Jordanians only, such as engineering, medical, teaching, administrative, security guard, and driving occupations.[256]

Types of Permits: They can be issued an ordinary work permit tied to a specific employer, or a flexible/free work permit (through the trade union federation or associations) that lets them move freely between employers.[257]

Refugees in Camps: Camp residents (for example in Zaatari and Azraq) are entitled to free work permits, which also serve as a temporary permit to leave and re-enter the camp, to ease their movement.[258]

b. The Legal Status of Non-Syrian Refugees (Iraqis, Yemenis, Gazans, etc.):

Legal Restrictions: The exceptional facilities granted to Syrian nationals do not extend to them.

Permit Conditions: They are subject to the ordinary conditions for recruiting and employing migrant labor, which require a sponsor (employer) and payment of the full fees without exemption, and only within the occupations open to non-Jordanians.[259]

c. Basic Labor Rights Granted (under the Labor Law): Once a refugee obtains an official work permit, they have the following legal rights for their protection[260]:

254. Belal Fallah, Caroline Krafft, and Jackline Wahba, "The Impact of Refugees on Employment and Wages in Jordan," Journal of Development Economics 139 (2019): 203–216.
255. Jordanian Ministry of Labor, "[Employment of Syrian Refugees]", Ministry of Labor website, accessed 24 August 2026.
256. International Rescue Committee, Policy Brief #2: Right to Work for Refugees under International Law: Syria Crisis Response – Lebanon & Jordan. Jordanian Ministry of Labor, "[Occupations Closed to Non-Jordanian Workers]", consolidated amended document of Decision No. 58/2020 and subsequent decisions, accessed 24 August 2026.
257. Tamkeen for Legal Aid and Human Rights, [Syrian Refugees and Social Security in Jordan], 12.
258. UNHCR, Frequently Asked Questions: Work Permits for Syrian Refugees in Jordan, version valid until December 2018.
259. Tamkeen for Legal Aid and Human Rights, The Right to Work for Non-Syrian Refugees in Jordan, policy paper.
260. UNHCR, Frequently Asked Questions: Work Permits for Syrian Refugees in Jordan.

- Wages: The right to the minimum wage in force in the Kingdom and to means of proving wages paid.

- Social Protection: Enrolling the worker in social security to protect them against work injuries and secure their future entitlements.

d. Exemptions, Fines, and Violations:

- The Jordanian government grants periodic grace periods to regularise status, during which Syrian workers are exempted from fines and permit fees accrued for previous periods, to make their presence in the market lawful.
- Working without an official permit exposes the establishment to financial fines and exposes the refugee worker to both legal accountability and aggravated administrative measures.

e. Working Hours and Leave: The right to set official working hours, Friday as a day off, and paid annual and sick leave.

It follows that, in principle, national legislation, including the Labor Law, does not exempt holders of refugee documents from the requirement to obtain a work permit under Article 12 of the Labor Law. Legal situations differ by nationality, however, as explained below.

2. Refugee Workers of Syrian Nationality

The Ministry of Labor seeks to regulate the presence of non-Jordanian workers in the Jordanian labor market, including Syrian refugee workers. It stresses the need to work legally, to obtain the necessary and appropriate work permit, whether with an employer or under one of the other types of work permit, and to keep to the occupation the permit covers. It also stresses that a work permit protects both worker and employer, and that working in violation exposes both employer and worker to legal accountability.

For Syrian nationals, the government, represented by the Ministry of Labor, issued special instructions to facilitate the issuing of work permits, first in 2018, later amended in 2020. These instructions freed Syrian nationals from the occupational restrictions imposed on other nationalities, allowing them to obtain work permits in occupations that may not be available to other non-Jordanians, and exempted them from work permit fees to encourage them to obtain permits on the basis of the 2016 decision to simplify the rules of origin between Jordan and the European Union.

The regulation of Syrian refugees' work in Jordan has undergone a radical shift: official policy moved from a complete ban and legal strictness to regulated integration and the institutionalisation of their employment through extensive facilities and exemptions. Jordan hosts about 1.3 million Syrians (more than 670,000 of them officially registered as refugees), and their work is regulated by a complex web of domestic legislation, international agreements, and flexible ministerial decisions.[261]

261. Jordanian Ministry of Labor, "[Employment of Syrian Refugees]".

In 2016, there was a breakthrough for Syrian refugees when Jordan allowed both camp residents and those living in the governorates to work in the local market in certain occupations, exempting them from the work permit fees paid by other migrant workers, in response to the recommendations of the 2016 London Conference on the Syrian crisis. According to Ministry of Labor statistics, 216,000 Syrian workers obtained work permits from 2016 to the end of 2020, of whom about 205,000 were men and the rest women.[262]

Historical Development of Syrians' Work (2011–2026)

a. The Stage of Prohibition and Legal Strictness (Informal Work) (2011–2015):

Legal Status: Syrian refugees were not allowed to work legally, because the Labor Law's provisions on 'migrant workers', with their complex procedures, were applied to them. In this stage, Syrians were treated as 'foreign migrant nationals', and Article 12 of the Labor Law was strictly applied.

Features: A complete ban on working without permits, whose high fees (between 400 and 700 dinars) refugees could not possibly afford. In this period 'hidden informal work' spread in agriculture, restaurants, and construction, and violators faced harsh legal measures, including fines or return to the camps. The great majority turned to the informal economy (the informal sector), working as daily laborers in agriculture and construction with no legislative cover protecting their labor rights.

b. The Shift towards Regulated Work and the London Conference (the 'Jordan Compact' and Easier Permits) 2016:

Legislation and Decisions: The signing of the 'Jordan Compact' at the London donors' conference in February 2016.[263]

Actual Impact: Jordan agreed to integrate Syrian refugees into the labor market in return for international grants, concessional loans, and easier rules of origin for exports to the European Union. Syrian refugees were allowed to work in several economic sectors after the international community pledged funding and wider trade facilitation under the 'Jordan Compact', an initiative to improve access to education and lawful work for Syrians forced to leave their homes. On 4/2/2016, the United Kingdom, Germany, Kuwait, Norway, and the United Nations hosted the donors' conference in London, where members of the international community met and pledged their support for Syria and the region. The London Conference provided for financial support and facilities for Jordan's national response plan to the Syrian refugee crisis worth $1.7 billion USD, as well as European Union pledges of concessions to simplify rules of origin for exports to the European market. On that basis, the Jordanian government agreed to absorb a specified number of Syrians into the labor market, estimated at 200,000 refugees for increased international investment, easier access for Jordanian exports to the EU market, multi-year grants, and concessional loans.

262. "[10 years of Syrian refuge in Jordan: economic integration and joint projects]", Al Jazeera Net, 21 March 2021.
263. "[10 years of Syrian refuge in Jordan]".

As for refugees' right to work under the Memorandum of Understanding signed by the Government of Jordan and UNHCR in 1998, renewed in 2014, Articles 8 and 9 provide the following:

Article 8: 'To enable the refugee to provide a decent life for his family, the two parties have agreed to grant a refugee lawfully present in the Hashemite Kingdom of Jordan the right to work on his own account, where the laws and regulations in force permit.'

Article 9: 'Refugees holding certificates recognised by the competent Jordanian authorities who wish to practise a liberal profession may also practise that profession, where the laws and regulations permit.'

The Memorandum affirmed that Syrian refugees' right to work is subject to the Jordanian Labor Law and to the regulations, instructions, and decisions issued by the Ministry of Labor, so a Syrian refugee's work is governed by Article 12 of the Labor Law. The UNHCR document issued to each registered refugee also states that it does not entitle its holder to a work permit or residency in Jordan, and that issuing work and residency permits falls within the authority of the Government of Jordan.

Ministerial Decisions of 2016: A landmark decision exempted Syrian refugees from work permit fees and stamp duties (from April 2016), leaving only a nominal processing fee of 10 dinars. The 'security card (Ministry of Interior card)' was adopted as the basic document for issuing the permit. Refugees living in camps (such as Zaatari and Azraq) were also allowed to leave to work legally in the governorates.

c. Institutionalising Flexibility: 'Free and Flexible Permits' (2017–2019)[264]

Legislation and Decisions: The signing of an agreement between the Ministry of Labor and the General Federation of Jordanian Trade Unions in August 2017 to issue flexible permits for particular sectors. The agreement concerned the issuing of flexible work permits to Syrian refugee workers within occupational groups across various economic sectors. The Ministry of Labor allowed these flexible permits to be issued, including a reference list of occupational groups and a description of the occupation on the work permit card, within the occupations open to non-Jordanian workers, on condition that beneficiaries are enrolled in social security.

Actual Impact: 'Flexible' or 'free' permits were introduced in the construction and agriculture sectors. They allowed Syrian workers to move between employers without being tied to a sponsor or a specific employer, which protected them from exploitation and eased their lawful movement in the market.

The General Federation of Jordanian Trade Unions began issuing work permits to Syrian refugees working in construction. Permits not tied to a particular employer or a specific post are the first of their kind in the Arab region since the Syrian crisis broke out in 2011. The Federation issues temporary permits for 10 JOD directly to refugees working in

264. Jordanian Ministry of Labor, "[Employment of Syrian Refugees]".

construction in Jordan, one of the sectors open to non-nationals under the Jordanian Labor Law. Previously, these permits were tied to particular employers who applied on a workers' behalf for specific posts. Applicants for the new permits must also buy insurance policies for 50 JOD (about $70 USD) instead of the social security coverage previously required. The new step came after the Ministry of Labor and the General Federation of Jordanian Trade Unions signed a memorandum of understanding in June allowing the Federation to issue 10,000 temporary permits a year, with the permit's renewable annually. The agreement was reached with the support and coordination of the ILO office in Amman, through the project 'Supporting the Strategic Objective of the London 2016 Syria Donors' Conference', funded by the UK Foreign Office.[265]

At this stage, and to implement Jordan's commitments at the London Conference, the Jordanian government put in place a package of measures:

- Work permits for Syrian workers exempt from all fees and stamp duties, and 10 dinars charged as a processing fee. For a construction work permit under the umbrella of the General Federation of Jordanian Trade Unions, the worker must obtain an insurance policy from an insurance company (45 Jordanian dinars), providing financial cover up to set ceilings for work injuries and death.[266]
- Social security enrolment is compulsory in principle, except for agricultural workers, domestic workers, and construction workers under the umbrella of the General Federation of Jordanian Trade Unions. Syrians working in construction under the Federation's umbrella must obtain an insurance policy and keep the original.
- Syrian refugees living in camps can obtain a work permit to work throughout the Kingdom in the occupations open to non-Jordanians.[267] These work permits allow them to leave and return for up to one month, under special instructions agreed between the Syrian Refugee Affairs Directorate at the Ministry of Interior, the Ministry of Labor, the UNHCR, and the ILO. In February 2017, the Jordanian Ministry of Labor issued a decision under which Syrian refugees in the camps are granted work permits allowing them to work outside the camps in Jordan's various cities, return within a maximum of one month and then leave again. Under this decision, a Syrian worker living in the camps can leave without having to request leave from the camp administration, since the work permit counts as leave. The papers needed for a work permit in the camps are the same as outside them, except for the service card (security ID), which is specific to Syrians living outside the camps.
- The security card issued by the Ministry of Interior / Syrian Refugee Affairs Directorate is the approved document for issuing permits.[268]
- A Syrian worker can move from one employer to another without obtaining a clearance from the previous employer when the work permit expires.[269]

265. International Labor Organization, "[Jordan begins issuing work permits to Syrian refugees, the first of their kind in the Arab states]", 9 August 2017.
266. Article 8 of the Comprehensive Instructions on the Conditions and Procedures for Employing Non-Jordanian Workers of Syrian Nationality of 2018.
267. Article 6(a) of the Comprehensive Instructions on the Conditions and Procedures for Employing Non-Jordanian Workers of Syrian Nationality of 2018.
268. Article 6(b) of the Comprehensive Instructions on the Conditions and Procedures for Employing Non-Jordanian Workers of Syrian Nationality of 2018.
269. Article 5 of the Comprehensive Instructions on the Conditions and Procedures for Employing Non-Jordanian Workers of Syrian Nationality of 2018.

- A Syrian worker can move between sectors when their work permit expires.[270]
- The Minister may open some closed professions and technical occupations to non-Jordanian workers of Syrian nationality who are permitted to work in the various economic sectors, according to labor market conditions and on the recommendations of the relevant bodies, in a way that does not affect Jordanians' job opportunities, on the recommendations of the Employment Committee. Each case is considered individually by the competent committee in the Ministry.[271]
- **Agriculture:** Work permits linked to agricultural cooperatives were allowed, without being tied to a specific employer.
- **Construction:** Free work permits in construction were made available through the offices of the General Federation of Jordanian Trade Unions.
- **Home-Based Businesses**: In 2018, a government decision allowed Syrian refugees to set up and run home-based businesses independently, without the usual requirement of partnership with a Jordanian citizen (such as cooking, tailoring, and handicrafts)[272].
- Migrant workers in general who work in the Kingdom must obtain a work permit, and the same applies to Syrian workers in any sector. This includes work on cash-for-work projects, where the agency or organisation implementing the project (or the municipalities, directorates, executing ministries, NGOs, or associations) must apply to the Ministry of Labor for work permits for the Syrians working on these projects. The work permit's term matches the term of the employment contract (temporary work permits of less than six months can be obtained).[273]

d. Institutionalising Home-Based Businesses and Social Security Coverage (2020–2023):

Legislation and Decisions: The Instructions on the Conditions and Procedures for Employing Non-Jordanian Workers of Syrian Nationality of 2020 were issued, the Ministry of Local Administration and the Greater Amman Municipality amended the instructions on home-based business licences, and the Social Security Corporation issued circulars.

The Instructions on the Conditions and Procedures for Employing Non-Jordanian Workers of Syrian Nationality of 2020 define a worker as 'any non-Jordanian person, male or female, of Syrian nationality, holding the special service document for the Syrian community issued by the Ministry of Interior.'

The Instructions on the Conditions and Procedures for Employing Non-Jordanian Workers of Syrian Nationality of 2020 define a flexible work permit as 'an official document issued by the Ministry to the worker allowing him to work for any employer in the occupations open to non-Jordanians within the occupational group, without being restricted to a specific geographical area, and issued under the umbrella of any of the cooperatives approved by the Ministry, the General Federation of Jordanian Trade Unions or any other body the Minister specifies.'

270. Article 7 of the Comprehensive Instructions on the Conditions and Procedures for Employing Non-Jordanian Workers of Syrian Nationality of 2018.
271. Article 10 of the Comprehensive Instructions on the Conditions and Procedures for Employing Non-Jordanian Workers of Syrian Nationality of 2018.
272. Jordanian Ministry of Labor, "[Employment of Syrian Refugees]".
273. Article 4 of the Comprehensive Instructions on the Conditions and Procedures for Employing Non-Jordanian Workers of Syrian Nationality of 2018.

On 18/7/2021, the Social Security Corporation decided to bring Syrian workers holding flexible work permits under the social security umbrella and make this a condition for completing the issue of the work permit.

Flexible work permits give workers the freedom to choose to work for any employer, not tying them to one. This will, of course, raise the level of social protection, given social security coverage and the requirement of social security for obtaining a work permit. Syrian workers may face difficulties in enrolling, however, because they are required to pay the full social security contribution for a whole year, which adds to their burden, especially since many do seasonal work for two or three months and so will not have the income to pay social security contributions.[274]

List of Occupations for Syrians by Occupational Group:[275]

- The decision above allowing flexible work permits to be issued covered the occupational groups in both agriculture and construction.
- The Instructions on the Conditions and Procedures for Employing Non-Jordanian Workers of Syrian Nationality of 2020, as amended[276].
- A procedural guide to issuing flexible work permits for non-Jordanian workers of Syrian nationality was issued.
- A procedural flyer on issuing flexible work permits for non-Jordanian workers of Syrian nationality was issued[277].

Actual Impact: Syrian refugees outside the camps were allowed to set up licensed, lawful home-based businesses in specific sectors (such as handicrafts and food preparation). In 2021, the issue and renewal of flexible work permits was made conditional on social security coverage (a declaration of partial or full enrolment protecting the worker against work injuries and old age).[278]

e. Market Control, the End of Exemptions, and the Regulation of Voluntary Return (2024–2026):

Legislation and Decisions: Jordanian Ministry of Labor decisions issued in late 2024 and early 2025 setting final deadlines for exemptions.

Actual Impact: After years of exemptions, the Jordanian Ministry of Labor announced the end of full, automatic exemption from permit fees and fines. At the start of 2025, a decision gave Syrian workers a grace period to regularise their status and benefit from exemptions from past fines before 1 June 2025, with the fees charged to migrant workers to be phased in to standardise labor market procedures.

274. Tamkeen for Legal Aid and Human Rights, [Syrian Refugees and Social Security in Jordan], 12.
275. Jordanian Ministry of Labor, Decision No. 46/2021, 1 July 2021, on professional groups for workers of Syrian nationality.
276. Instructions on the Conditions and Procedures for Employing Non-Jordanian Workers of Syrian Nationality of 2020, as amended, Official Gazette, issue 5687, 31 December 2020, 4828.
277. Jordanian Ministry of Labor, [Procedural Flyer for Issuing Flexible Work Permits to Non-Jordanian Workers of Syrian Nationality].
278. Tamkeen, [Syrian Refugees and Social Security in Jordan], 12.

The Current Picture (2026):

The tightening of labor market procedures coincides with declining international funding for the Syria crisis response plan. This period has seen tighter regulation of 'voluntary return': the Ministry of Interior and UNHCR issued clear instructions that a refugee who leaves voluntarily for Syria without obtaining a 'prior exit and return permit' from the Jordanian Ministry of Interior will have their refugee file closed and will not be allowed to return to benefit from their previous labor privileges in Jordan.

Summary of the development of the legal status of Syrian refugee workers in Jordan:

Period	Legal Status	Types of Permits Available	Fees	Social Protection Coverage
2011-2015	Treated as foreign migrants (Article 12 of the Labor Law applied)	Ordinary permits tied to one employer	Full, prohibitive fees (400 - 700 dinars)	Not legally covered (informal work)
2016	Launch of the Jordan Compact	Ordinary permits in sectors open to migrants	Fully exempt (except a 10-dinar processing fee)	Camp restrictions begin to be loosened
2017-2020	Institutionalised employment, trade unions brought in	Flexible/free permits (agriculture and construction)	Exempt from fees and stamp duties	Insurance policies introduced as a temporary substitute for social security
2021-2023	Businesses institutionalised, linked to social security	Flexible permits + home-based business licences	Exempt from fees	Compulsory social security enrolment
2024-2026	Phased end of exemptions and current market control	Permits under strict control within permitted occupations	Fees and fines reimposed after grace periods expire	Fully linked to the legal system for migrant labor

Refugee Workers of Iraqi Nationality

The legal status of Iraqis in Jordan is a highly complex issue. The Jordanian government usually refers to Iraqis as 'guests,' 'brothers,' and 'temporary visitors,' or 'irregular migrants,' while international bodies and civil society organisations refer to them as 'beneficiaries,' 'displaced Iraqis,' or 'persons of concern,' to avoid complications with the authorities. The issue arose in 2003, when the UNHCR announced that all Iraqis in Jordan were covered by the temporary protection regime and would therefore not go through refugee status determination. It was thought at the time that instability in Iraq would be temporary and that Iraqis in Jordan would soon be able to go home. The UNHCR gave Iraqis temporary documents indicating that they were asylum seekers, but the government rejected this, since under the Memorandum of Understanding between the UNHCR and the Government of Jordan, asylum seekers' status must be determined and recognised given the right to resettlement in third countries.[279]

279. Escoffier et al., [Economic and Social Rights of Migrants and Refugees in the Euro-Mediterranean Region], 73.

The work of Iraqis, including refugees, in Jordan is subject to a strict legislative framework that treats them as 'foreign migrant nationals' rather than refugees, with the right to work legally limited to holders of official work permits linked to 'specialised skills'[280] or 'investment.' Unlike Syrian refugees, who received extensive exemptions and facilities under the 2016 'Jordan Compact', Iraqi workers remained governed by the standard residency and labor laws, with no exemption from the mandatory fees.

Governing Legislative Framework and Decisions:

- **Article 12 of the Jordanian Labor Law No. 8 of 1996:** Prohibits any non-Jordanian migrant from working without a work permit approved by the Minister of Labor. It imposes full fees and compliance with national employment ratios in establishments.
- **The Residence and Foreigners' Affairs Law No. 24 of 1973:** Requires Iraqis to renew their residency annually. The 1998 Memorandum of Understanding signed with the UNHCR gives no automatic right to local integration or self-employment.
- **Closed Professions Instructions:** Iraqis (like other migrants) are barred from working in more than 20 key sectors, including accounting, sales, administration, teaching, pharmaceutical, and hairdressing and beauty.
- **Rules for Employing People with Specialised Skills and Companies:** The Ministry of Labor allows permits to be issued to Iraqis in highly specialised occupations (university teaching staff, consultant experts, banking, and finance, and head chefs), subject to the approval of the relevant sectoral ministries.[281]

Historical Development of Iraqi Employment in Jordan:

a. The Gulf War Wave and the 1990s (1990–2002)

Nature of Presence: Hundreds of thousands of Iraqis arrived after the 1991 war.

Economic Situation and Work: This wave was marked by the arrival of an elite of scientific and academic talent, doctors, and engineers.

Decisions: The Jordanian government allowed some Iraqi professors and doctors to be employed in private and public universities and hospitals to fill the acute shortage of local talent at the time, under official employment contracts and special annual permits.

b. The Largest Displacement and the Parallel Labor Market (2003–2013)

Nature of Presence: After the US invasion of Iraq in 2003, about 500,000 to 750,000 Iraqis fled to Jordan.

280. Jordanian Ministry of Labor, [Work Permit Guide for Non-Jordanian Workers with Specialised Skills].
281. Jordanian Ministry of Labor, [Work Permit Guide for Non-Jordanian Workers with Specialised Skills].

Economic Situation and Work: The Iraqi presence in Jordan split into two groups: **the first**, wealthy, set up large companies and factories under the Jordanian Investment Promotion Law; **the second**, poor, could not afford work permit fees (between 300 and 500 dinars at the time). Due to economic circumstances, this second group was forced to work in the informal sector, clandestinely. According to Human Rights Watch, Iraqis working clandestinely usually say they are paid less than the going rate and suffer exploitation, abuse, and frustration, and are usually unable to earn enough to live adequately[282].

Legislative Decisions: Jordan refused to grant Iraqis formal 'refugee' status and treated them as 'temporary guests.' This gave rise to a large informal (hidden) labor market, with thousands of Iraqis working without permits in restaurants, cafés, and trade for low wages, and many incurring overstay fines and expulsion if caught by Ministry of Labor inspection.

c. The ISIS Refugee Wave and Legal Stagnation (2014–2019):

Nature of Presence: 2014 saw a new refugee wave of more than 30,000 Iraqis (mostly Christians from Mosul and Anbar).

Economic Situation and Work: This group faced very difficult living conditions. While the 2016 'Jordan Compact' opened the labor market to Syrian refugees free of charge and flexibly, Iraqi refugees were excluded from these privileges, so they still had to pay full permit fees and be tied to a sponsor.

Impact: As a result, Iraqi workers stayed in the informal economy or depended wholly on scant cash assistance from the UNHCR and church relief organisations.[283]

d. Institutionalising Skills and Falling Refugee Numbers (2020–2026):

Decisions and Current Situation: The Ministry of Labor issued an updated guide to work permits for people with specialised skills. This route lets Jordanian establishments recruit Iraqi talent into consultancy, technical, and university jobs for a high fee, with compulsory enrolment in the Social Security Corporation.[284]

Market Reality: Formal work by Iraqis is concentrated in companies owned by Iraqi investors (such as contracting, large restaurants, private schools, and general trading companies), while some work freelance from home or in manual craft repairs, out of reach of inspection.

282. Escoffier et al., [Economic and Social Rights of Migrants and Refugees in the Euro-Mediterranean Region], 75.
283. Human Rights Watch, The Silent Treatment: Fleeing Iraq, Surviving in Jordan, 27 November 2006.
284. Jordanian Ministry of Labor, [Work Permit Guide for Non-Jordanian Workers with Specialised Skills].

By the end of 2025 and early 2026, this registered number had fallen markedly to only 29,235 Iraqi refugees (5.8% of all refugees in Jordan). The sharp decline is due to resettlement programmes in third countries (the United States, Canada, and Australia) or to voluntary migration and return. Government and independent reports estimate the total number of Iraqis living in Jordan (investors, students, and residents) at between 120,000 and 150,000, with the better-off among them declining to register as refugees on UN lists. Iraqis have large investments in Jordan, estimated in the billions of dollars (especially in real estate, factories, and services). Jordanian law allows these investments to employ Iraqi workers up to a set proportion (usually no more than 10% to 20% of the establishment's total workforce), provided it is shown that no alternative Jordanian worker is available.

3. Refugee Workers of Yemeni Nationality

The work of Yemeni refugees and asylum seekers in Jordan is subject to a strict legislative framework that treats them as 'foreign migrant nationals' instead of refugees. Yemenis in Jordan have received none of the exemptions or facilities granted to Syrian workers under the 2016 Jordan Compact, which makes their participation in the formal labor market very limited and tied to high financial costs, as well as complex residency conditions.[285]

Legislative Framework and Decisions Governing Yemenis' Work

The Jordanian authorities regulate the presence and work of the Yemeni community and asylum seekers on the basis of the following legislation:

- **Article 12 of the Jordanian Labor Law No. 8 of 1996:** Explicitly prohibits employing any non-Jordanian worker without an official work permit approved by the Ministry of Labor. The Law requires Yemeni workers to pay the full fees, without exemption.
- **The Residence and Foreigners' Affairs Law No. 24 of 1973:** Requires Yemeni nationals to obtain and renew annual residency. Jordanian authorities formally refuse to accept the UNHCR 'asylum-seeker certificate' as proof of legal residence for work purposes, and require official residency tied to an employment contract, study, or investment.[286]
- **Ministry of Interior decision of 2015 (prior visa requirement):** This decision was a major legal turning point. The Jordanian government imposed a prior entry visa on Yemeni nationals wishing to enter the Kingdom, allowing entry only for medical tourism or education under strict conditions, restricting the right to switch to work residency.[287]
- **Ministerial removal decisions of 2019–2021:** In late 2019 and early 2021, the Ministry of Interior, in coordination with the Ministry of Labor, ordered the removal and expulsion of Yemeni migrants found to be working without official permits, or those who entered for medical tourism or education, then joined the irregular labor market.

285. Human Rights Watch, "[Jordan: Yemeni asylum seekers expelled – others face removal orders]", 30 March 2021.
286. Solin Al-Majali, "[A Refuge without Stability: Yemeni Asylum Seekers in Jordan]", Sana'a Center for Strategic Studies, 19 March 2022.
287. Al-Majali, "[A Refuge without Stability]".

Historical Development of Yemeni Employment (2014–2026):

a. Free Entry and Flexible Work (2014–2015)

Legal Status: Until the end of 2015, Yemenis could enter Jordan without a prior visa.

Nature of Work: When armed conflict broke out in Yemen in 2014, thousands of families fled to Jordan. This stage was marked by 'flexibility.' Yemeni workers partly joined the informal economy (Yemeni restaurants, services, and shops) without intensive inspection pressure from the Ministry of Labor.

b. Restrictions and the Rise of the 'Hidden Market' (2016–2019)

Legislative Shift: The prior visa decision came into force. The Jordan Response Plan for the Syria Crisis (JRP) excluded Yemeni refugees from the right to fee-exempt work permits.

Impact on Work: Thousands of Yemenis found themselves unable to regularise their status because of the prohibitive cost of work permits (between $600 and $1000 USD a year). This gave rise to a parallel informal labor market, in which Yemeni women and men work long hours for low wages, while incurring overstay fines of 1.5 dinars for every day's delay.

c. Stricter Inspection and the Halt to Registration (2020–2024)

Decisions: The Jordanian government formally asked the UNHCR to stop registering any new asylum seekers of non-Syrian nationalities (Yemenis included).

Market Reality: The Ministry of Labor stepped up inspection campaigns on establishments (especially popular restaurants, bakeries, and retail shops). This cost many Yemeni asylum seekers their jobs and drew them into a spiral of legal difficulties, for fear of expulsion and removal to Yemen for breaching local laws.

d. Institutionalised Oversight and the Current Situation (2025–2026)

The Current Picture: In 2026, the Jordanian Ministry of Labor operates strict rules that do not allow a work permit to be issued to any migrant (Yemenis included) whose passport carries an entry stamp for purposes other than work (such as medical tourism or education stamps).

Economic Situation: Formal Yemeni employment is currently concentrated in the 'Yemeni investors' sector (large restaurants, shops selling Yemeni products, and general trading companies), with very restricted migrant employment ratios, while the great majority of asylum seekers face a legal impasse that bars them from formal self-employment or home-based work.

Figures from international and local bodies show the size of the gap between those officially registered and those actually resident:

Registered Yemeni Refugees (UNHCR): The latest official UNHCR statistics for Jordan, as of 30 April 2026, show that only 6,095 Yemeni refugees were registered as asylum seekers (1.5% of all registered refugees in Jordan). This is a sharp fall compared to 2021-2024, when registrations stood at roughly 14,000 to 48,000 people. This decline is due to resettlement programmes in third countries or to people regularising their status through migrant residency outside the asylum framework.

Estimates of the Total Community (Government): Statistics from civil society organisations (such as the Arab Renaissance for Democracy and Development, ARDD) and official population reports estimate that there are between 27,000 and 32,000 Yemeni nationals in Jordan.

Share of Informal Work: Human rights reports indicate that more than 85% of working-age Yemenis are in informal (unregistered) jobs, because they cannot meet the legislative conditions for an official work permit tying them to a specific employer.

4. Refugee Workers of Palestinian Nationality (Gazans):

According to the latest official census by the Department of Statistics, there is an estimate of 634,182 Gazans in Jordan. These Palestinian refugees came to the Kingdom after the 1967 war and are legally classified as 'temporary passport holders' without a national number.[288]

The Legislative and Legal Framework for Work.

Gazans' work in Jordan is subject to a particular legislative system that sets them somewhat apart from foreign migrant labor on the one hand and from Jordanian citizens on the other:

- **The Jordanian Labor Law (No. 8 of 1996, as amended):** The Law requires anyone who does not hold a Jordanian national number to obtain a work permit to carry out any economic activity. Government policy treats them as migrant workers, although the characteristics of a migrant worker do not apply to them: they did not come to Jordan to work of their own free will, and they cannot leave Jordan and return to the Gaza Strip whenever they wish. They are therefore barred from the categories of jobs described as closed professions, and find themselves forced to work in the informal sector, which offers no form of social protection. It should be noted that official institutions' treatment of Gazan workers is inconsistent: sometimes they are strictly barred from working and sometimes a blind eye is turned even to work in closed professions[289]. Before 2012, the Ministry of Labor did not require Gazans and temporary passport holders[290] to obtain work permits, until the Legislation and Opinion Bureau issued an opinion in 2012 that

288. BADIL Resource Center for Palestinian Residency and Refugee Rights, "[Report on the Situation of Palestinian Refugees in Jordan]".
289. Tamkeen for Legal Aid and Human Rights, [Palestinians Holding Permanent Residency Who Hold Temporary Passports, Including Gazans] (2024), 7 ff.
290. Temporary passport holders are persons granted a Jordanian passport valid for two years and renewable under Article (1) of the Disengagement Instructions of 1988. Article (2) deemed every person resident in the West Bank before 31/7/1988 a Palestinian citizen and not a Jordanian. Temporary passports are granted to help the Palestinian people with their hardship while they keep and preserve their Palestinian nationality; this does not mean that any of them has acquired Jordanian nationality, as a holder of a Jordanian national number has.

they were subject to Article 12 of the Labor Law, which requires non-Jordanians to obtain a work permit. To address this, the Council of Ministers issued a decision exempting them from past work permit fees.

- **Fee Exemption Decisions:** Under the amendments and government decisions in force, Gazans are exempt from paying work permit fees and accrued fines retroactively.[291]
- **Nominal Fees:** The high permit fees (over 400 dinars for migrants) are replaced by a flat nominal fee of only 10 dinars as a service charge for processing the application.
- **Easier Process (2025/2026 updates):** The Ministry of Labor has formally accepted the white card (the civil status card for Gazans) for issuing and renewing work permits in place of the temporary passport requirement, to make things easier for them.[292]

Closed and Restricted Professions.

Despite the financial exemptions, the labor market open to Gazans is still restricted by the 'national labor protection policy', and opportunities are distributed as follows:

- **Liberal Professions and Professional Associations:** Gazans are prohibited from practising professions whose law requires membership of a professional association (barred to non-Jordanians), such as medicine, engineering, law, and pharmaceutical. This pushes them towards very few opportunities in the private sector or into informal work that leaves them vulnerable to exploitation and without labor rights[293].
- **Public Sector:** Gazans are excluded from employment in government departments and official posts, except in cases such as temporary contracts in education and health.
- **Permitted Occupations and Specialised Skills:** They may work in retail, construction, agriculture, and services, as well as through the 'specialised skills' route in private companies, subject to the approval of the regulatory bodies and the Minister (for example in money exchange, translation, and sports coaching).

Continuing Economic Challenges

Despite the government facilities, Gazan workers face three fundamental challenges:

- **The gap between text and practice:** Many struggle with the arbitrariness of some employers who hesitate to hire them for fear of legal liability or out of ignorance of the exemption decisions.
- **Lost investment in education:** Thousands of young people graduate from university in scientific fields (such as engineering and IT) and are then forced into low-skilled work because they cannot practise the professions governed by professional associations.
- **Dependence on the employer:** The work permit is tied to an 'employer' or sponsor, which weakens the Gazan worker's bargaining power in the market and leaves them exposed to low wages.

291. Tamkeen, [Palestinians Holding Permanent Residency Who Hold Temporary Passports, Including Gazans], 7 ff.
292. Jordanian Ministry of Labor, "[Minister of Labor: To make things easier for Gazans, the white card will be accepted instead of the temporary passport for issuing work permits]", 23 January 2025.
293. Tareq Dilwani, "[The hardship of Gazans in Jordan is harsh, and the reason is political fears]", Independent Arabia. 25 August 2023.

From early 2016, entering the labor market became harder for Gazans after the Minister of Labor issued a decision obliging Gazans who were working or wished to work to obtain work permits. This was accompanied by a decision of the Minister of Education barring them from working in private schools, based on a decision the Ministry had issued in 2015, but not applied at the time, which has now sought to enforce.[294]

These decisions prompted objections and protests from many Gazans at the time, and the Ministry of Labor announced that employers would be exempt from paying work permit fees for Gazans. It did not, however, revoke the requirement for them to obtain work permits. In practice, some employers and Ministry of Labor staff still turn a blind eye, which leaves thousands of Gazans at the mercy of arbitrary treatment, not knowing how to enter the labor market. The same applies to Palestinians living in Jordan who hold five-year Jordanian passports without national numbers, and to the children of Jordanian women among them.

Because entering the labor market involves so many restrictions and constraints for Gazans, they find themselves forced into the informal sector, especially manual trades such as carpentry, mechanics, metalwork workshops, small shops, and so on. Workers in these sectors enjoy no form of decent work, whether in terms of sufficient job opportunities, social security, occupational health and safety conditions, or other recognised decent work standards.[295]

5. Summary

The study shows that the regulation of refugee work in Jordan follow one legislative framework that comprehensively regulates refugees' legal status in the labor market. Instead, in principle, it is subject to the general rules governing the work of non-Jordanians, above all the Labor Law and the legislation, decisions, and instructions regulating the employment of non-Jordanian workers, alongside the rules on residence and foreigners' affairs. It follows that refugee or asylum-seeker status does not, in itself, give its holder an independent right to work or an automatic exemption from the legal requirements for non-Jordanian workers.

At the same time, the study reveals clear differences by nationality in refugees' legal and practical position in the labor market. The situation of Syrian refugees has changed significantly since 2016, in connection with Jordan's commitments under the London Conference and the 'Jordan Compact.' This led to special arrangements to ease their access to the labor market, including exemptions from some fees for set periods, more types of work permits, the introduction of flexible and temporary permits, easier work for camp residents, and the linking of some forms of work to the protection of the social security system.

Refugees of other nationalities, in contrast, especially Iraqis and Yemenis, have not benefited from a comparable set of facilities, and their access to the labor market has remained governed to a greater extent by the general rules on non-Jordanian labor, including residency and work permit requirements and the occupations open to non-Jordanians. The combination of these requirements, together with the financial cost and the restrictions on occupations and sectors, narrows the lawful work available to several of these groups, pushing some of their members

294. Tamkeen for Legal Aid and Human Rights, "['Tamkeen' calls on the Ministry of Labor to issue a regulation governing the work of Gazans in Jordan]".
295. Phenix Center for Economic and Informatics Studies, report ["Gazans" Resident in Jordan], in cooperation with the German Friedrich-Ebert-Stiftung, March 2017, 7–8.

into the informal economy, with the weak legal and social protection that goes with it.

Gazans and holders of temporary Jordanian passports have a particular and complex legal status. Although their residence in Jordan is stable and long-term, they are subject to the provisions on non-Jordanians for the purposes of many labor market rules, because they do not hold Jordanian nationality or a national number. The government has taken a number of measures to ease some of the burdens, particularly on work permit fees, but restrictions on certain professions, especially those whose practice depends on nationality or membership of a professional association, still limit the opportunities open to them and their ability to use their academic and professional qualifications.

The study also shows that the work permit is not merely an administrative requirement regulating a non-Jordanian worker's presence in the labor market, but a key link between lawful work and the effective access to a range of labor rights and social protections. Entering the labor market lawfully allows the rights set out in the Labor Law to be applied and improves the prospects of enrolling in social security and protection for work injuries and other rights. Working outside the regulated framework, in contrast, increases the likelihood of exploitation, low wages, and the absence of social protection and occupational health and safety.

Overall, the situation of refugee workers in Jordan reflects an intersection of considerations: protecting the national labor market, migration, and residency policies, obligations relating to refugee protection, and the demands of economic and social reality. The Jordanian experience also shows that legal access to the labor market is not determined by refugee status alone, but is shaped to a large extent by nationality, type of residency, sector and occupation, the kind of work permit or permits available, and government decisions and policies that change with economic, political, and humanitarian circumstances.

References:

Legislation and Official Decisions

- The Jordanian Constitution of 1952, as amended.
- Labor Law No. 8 of 1996, as amended.
- Residence and Foreigners' Affairs Law No. 24 of 1973, as amended.
- Visa Regulation No. 3 of 1997, as amended.
- Regulation on Designating Place of Residence No. 95 of 1998, as amended.
- Regulation on Work Permit Fees for Non-Jordanians No. 142 of 2019, as amended.
- Disengagement Instructions of 1988.
- Instructions on the Conditions and Procedures for Employing and Recruiting Non-Jordanian Workers of 2012, as amended.
- Instructions on the Conditions and Procedures for Employing Non-Jordanian Workers of Syrian Nationality of 2018.

- Instructions on the Conditions and Procedures for Employing Non-Jordanian Workers of Syrian Nationality of 2020, as amended.
- Jordanian Ministry of Labor, Decision No. 46/2021 on occupational groups for workers of Syrian nationality.
- Jordanian Ministry of Labor, amended consolidated document of Decision No. 58/2020 and subsequent decisions on the professions closed to non-Jordanian workers.

International Sources and Reports

- Human Rights Watch. "The Silent Treatment": Fleeing Iraq, Surviving in Jordan. 27 November 2006.
- Human Rights Watch. 'Jordan: Yemeni Asylum Seekers Deported – Others Face Removal Orders'. 30 March 2021.
- International Labor Organization. 'Jordan begins issuing work permits to Syrian refugees, the first of their kind in the Arab countries'. 9 August 2017.
- International Rescue Committee. Policy Brief #2: Right to Work for Refugees under International Law: Syria Crisis Response – Lebanon & Jordan.
- United Nations High Commissioner for Refugees. Frequently Asked Questions: Work Permits for Syrian Refugees in Jordan. December 2018.

Studies and Reports

- Escoffier, Claire, Pierre Tanturier, Ayman Halasa, Naima Baba and Shadi Sidhom. Economic and Social Rights of Migrants and Refugees in the Euro-Mediterranean Region: Individual Case Studies – France, Jordan, Morocco. Euro-Mediterranean Human Rights Network, 2008.
- Halasa, Ayman Adeeb. 'The Legal Status of the Non-Palestinian Refugee in Jordan', Mu'tah Lil-Buhuth wa Al-Dirasat: Humanities and Social Sciences Series 21, no. 2 (2006): 230. Jordanian Center for Labor Rights 'Workers' House'. The Jordanian Legislative Framework for Migrant Workers' Rights: The Right to Organise, Social Security, Occupational Health and Safety, Labor Inspection – Agricultural and Domestic Workers as a Case Study. 2023.
- Tamkeen for Legal Aid and Human Rights. Syrian Refugees and Social Security in Jordan.
- Tamkeen for Legal Aid and Human Rights. The Right to Work for Non-Syrian Refugees in Jordan.
- Tamkeen for Legal Aid and Human Rights. Palestinians with Permanent Residency Holding Temporary Passports, Including Gazans. 2024.
- Fallah, Belal, Caroline Krafft, and Jackline Wahba. "The Impact of Refugees on Employment and Wages in Jordan." Journal of Development Economics 139 (2019): 203–216.
- Al-Majali, Solin. 'A Haven Without Stability: Yemeni Asylum Seekers in Jordan'. Sanaa Center for Strategic Studies, 19 March 2022.

- Phenix Center for Economic and Informatics Studies. Report on 'Gazans' Living in Jordan. In cooperation with the Friedrich-Ebert-Stiftung, March 2017.

Official and Online Sources

- Department of Statistics, data on unemployment and the labor market.
- Jordanian Ministry of Labor, 'Non-Jordanian Workers'.
- Jordanian Ministry of Labor, 'Syrian Refugee Workers'.
- Jordanian Ministry of Labor, 'Professions Closed to Non-Jordanian Workers'.
- Jordanian Ministry of Labor, Comprehensive Guide to the Rules for Issuing Work Permits to Non-Jordanian Workers.
- Jordanian Ministry of Labor, Guide to Work Permits for Non-Jordanian Workers with Specialised Skills.
- Jordan News Agency (Petra). 'Statistics: Unemployment Rate for the Kingdom's Total Population Falls to 16.1%'. 2 April 2026.
- Dilwani, Tareq. 'Gazans in Jordan Suffer Harshly, and Political Fears Are the Reason'. Independent Arabia.
- Yassin, Reda. 'Jordan Halts Recruitment of Migrant Workers: Will Citizens Fill the Gap?'. Al Jazeera Net. 31 May 2025.

Annex 5: Legal Gap Analysis: Refugee Protection and Access to Lawful Work in Jordan (Dr. Samer Haddadin)

1. Executive Summary

Jordan has made important progress in opening parts of the labor market to refugees, especially Syrian refugees, and in strengthening its labor and anti-trafficking frameworks. The Syrian work permit and flexible permit model shows that Jordan can create administratively feasible pathways for lawful refugee work without requiring immediate adoption of a comprehensive asylum law. The Ministry of Labor work permit framework confirms differentiated arrangements for Syrians, including ordinary, temporary, and flexible permits that allow work for any employer within permitted professional groups without geographic restriction.[296]

At the same time, the present framework remains structurally limited. Refugees in Jordan are generally regulated through the ordinary system applicable to non-Jordanian workers. This approach does not sufficiently reflect their protection needs, inability to safely return in many cases, exposure to residency-related insecurity, or limited ability to complain against employers without fear of administrative consequences. Jordan is not a signatory of the 1951 Refugee

296. Ministry of Labor, The Comprehensive Guide of Principles for Issuing Work Permits for Non-Jordanian Workers, 2026, including provisions on Syrian refugee workers, temporary work permits and flexible work permits, https://mol.gov.jo/EBV4.0/Root_Storage/EN/EB_Info_Page/Comprehensive_Guide_for_issuing_work_permits_11-2-2026.pdf.

Convention or the main statelessness conventions, but the UNHCR-Government of Jordan Memorandum of Understanding incorporates core principles of international protection, including the refugee definition and non-refoulement.[297]

The central legal gap is not simply that refugees cannot work. It is that lawful work remains uneven, nationality-specific, documentation-dependent, sectorally restricted, and often financially difficult to maintain. Syrians have benefited from a more developed pathway. Iraqis and Yemenis have more limited access. Gazans and temporary-document holders face a distinct documentation and status problem. Gaza-affected persons after October 2023 may fall outside existing categories altogether. Domestic and agricultural workers face heightened risks because these sectors combine informality, isolation, weak inspection, and employer dependency.[298]

This paper recommends a practical reform package: a refugee-sensitive work authorization instruction, expansion of selected flexible permit features to non-Syrian refugees, clearer and broader work pathways for Gazans, a complaint firewall between labor enforcement and immigration enforcement, suspension of residency fines during labor or trafficking complaints, specialized inspection protocols for agriculture and domestic work, and explicit non-punishment with recovery and reflection safeguards for victims and presumed victims of trafficking.[299]

2. Purpose and Scope

This legal gap analysis examines the relationship between refugee protection and access to lawful work in Jordan. It focuses on Syrians, Iraqis, Yemenis, Gazans, and temporary-document holders, Gaza-affected persons after October 2023, and refugees or migrant workers in domestic and agricultural work. Its purpose is to identify gaps between the current legal and administrative framework and Jordan's international human rights obligations, including accepted recommendations under the 2024 UPR.

Access to work is not merely an economic issue for refugees. It is a protection issue. When lawful work is inaccessible, too costly, restricted to narrow sectors, or dependent on employer cooperation, refugees are pushed into informality. Informality then increases exposure to wage theft, unsafe work, harassment, threats, forced labor indicators, trafficking risks, and fear of contacting public authorities. This is the structural vulnerability that the project description identifies, namely the movement from formal protection into restrictive labor regulation, limited access to legal work permits, residency-related insecurity, and reduced ability to seek redress.[300]

297. UNHCR Jordan, Multi-Year Strategy 2023-2025, Summary, noting that although Jordan is not party to the refugee and statelessness conventions, the UNHCR-Government of Jordan Memorandum of Understanding sets out key principles of international protection, including the refugee definition and non-refoulement, https://www.unhcr.org/jo/sites/jo/files/legacy-pdf/2023-2025-SUMMARY-Multi-Year-Strategy-UNHCR-Jordan_final.pdf.
298. UNHCR Operational Data Portal, Jordan, noting registered refugee populations from Syria, Iraq, Yemen, Sudan, Somalia and other countries, and that around 80 per cent live outside camps, https://data.unhcr.org/en/country/jor.
299. Information and Research Center - King Hussein Foundation, Annex 1 Project Description, Strengthening Rights-Based Protection for Refugees and Persons Vulnerable to Trafficking in Jordan, 22 April 2026, Activity goal and indicators.
300. Information and Research Center - King Hussein Foundation, Annex 1 Project Description, Strengthening Rights-Based Protection for Refugees and Persons Vulnerable to Trafficking in Jordan, 22 April 2026, Activity goal and indicators.

The analysis is designed for government and donor use. It therefore emphasizes practical and implementable reforms rather than abstract legal critique alone. The recommendations are directed to named institutions and can be implemented through legal amendments, administrative instructions, standard operating procedures, inspection practice, referral pathways, training, and UPR follow-up mechanisms.

3. International and UPR Framework

Jordan is not a signatory of the 1951 Refugee Convention or its 1967 Protocol. This does not mean that refugee protection has no legal basis in Jordan. Jordan remains bound by broader international human rights obligations, including the principles of non-discrimination, access to justice, protection from forced labor and trafficking, protection of women and children, and non-refoulement as reflected in international protection practice and the UNHCR-Government of Jordan Memorandum of Understanding.[301]

Jordan's 2024 UPR creates a practical implementation framework. Jordan accepted recommendations to harmonize national legislation with ratified international human rights conventions, improve national legislation on human rights and freedoms, protect vulnerable groups in law and practice, and ensure that workers, including migrant workers, can obtain their labor rights by accessing competent authorities to submit complaints and grievances againstemployers.[302]

The most relevant accepted UPR recommendations for this analysis concern trafficking, labor rights, complaints, inspection, safe working conditions, women workers, social protection, and access to justice. Recommendations 136.67 to 136.72 address trafficking prevention, victim protection, national capacity, implementation of the national anti-trafficking strategy, and institutional effectiveness. Recommendations 136.77 to 136.85 address workers' ability to assert rights, complaint access, inspection visits, and safe and healthy work environments. Recommendations 136.86 to 136.88 address women's working conditions and awareness of laborrights.[303]

This makes the UPR more than a reporting exercise. It gives Jordan an accepted reform language. Measures that improve lawful refugee work, complaints, inspection, social protection and trafficking screening can be framed not as external pressure, but as implementation of commitments Jordan has already accepted.

301. UNHCR Jordan, Multi-Year Strategy 2023-2025, Summary, noting that although Jordan is not party to the refugee and statelessness conventions, the UNHCR-Government of Jordan Memorandum of Understanding sets out key principles of international protection, including the refugee definition and non-refoulement, https://www.unhcr.org/jo/sites/jo/files/legacy-pdf/2023-2025-SUMMARY-Multi-Year-Strategy-UNHCR-Jordan_final.pdf.
302. Human Rights Council, Report of the Working Group on the Universal Periodic Review: Jordan, A/HRC/56/10, 15 March 2024, recommendations 136.3, 136.4, 136.8, 136.9, 136.18, 136.27, 136.67-136.72, 136.77-136.91, and 136.192-136.196.
303. Human Rights Council, Report of the Working Group on the Universal Periodic Review: Jordan, A/HRC/56/10, 15 March 2024, recommendations 136.3, 136.4, 136.8, 136.9, 136.18, 136.27, 136.67-136.72, 136.77-136.91, and 136.192-136.196.

4. Domestic Legal and Administrative Framework

Jordan's Labor Law regulates non-Jordanian workers through a prior authorization model. Article 12 provides that it is not permissible to recruit or employ a non-Jordanian worker except with the approval of the Minister of Labor or an authorized delegate and only where the work requires experience or competence not available among Jordanian workers or where the number of qualified Jordanian workers does not meet demand. The same provision requires non-Jordanian workers to obtain a work permit before recruitment or employment.[304]

Article 12 also allows the Minister to issue instructions identifying occupations prohibited to non-Jordanians, permitted employment ratios, and required guarantees. It treats employment without a permit, work for an employer other than the one specified in the permit, and work in an unauthorized occupation as violations. In some cases, the Minister may issue a deportation decision against the non-Jordanian worker who may not be re-employed in Jordan for at least five years from the implementation of the deportation decision.[305]

This structure is understandable from a labor-market governance perspective, but problematic when applied to refugees without protection-sensitive safeguards. A refugee working without a permit may be doing so because the permit route is unavailable, too costly, tied to an employer, restricted by sector, blocked by documentation, or inaccessible. Treating irregularity primarily as a violation risk punishes vulnerability rather than addressing exploitation.

Jordan has amended its Labor Law to strengthen workplace protections, including protection from sexual harassment. The law allows a worker to leave work without notice while retaining legal rights where the employer or representative assaults the worker by beating, humiliation, sexual assault, or sexual harassment. It also defines sexual harassment as physical or verbal acts or behavior of a sexual nature, or related threats that undermine the worker's dignity and cause physical, psychological, or sexual harm.[306]

The anti-trafficking framework has also developed. Jordan's UPR presentation noted amendments to the Human Trafficking Prevention Act in 2021 to enhance victim protection, increase penalties, and address compensation and support. It also noted the 2023 amendment of the shelter framework to expand shelter arrangements for victims and potential victims.[307]

304. Jordan, Labor Law No. 8 of 1996, as amended, Article 12, English version with 2023 amendments published by the Ministry of Labor, https://mol.gov.jo/ebv4.0/root_storage/en/eb_list_page/final_labor_law_%28with_2023_amendments%29_qa_%282%29.pdf.
305. Jordan, Labor Law No. 8 of 1996, as amended, Article 12, English version with 2023 amendments published by the Ministry of Labor, https://mol.gov.jo/ebv4.0/root_storage/en/eb_list_page/final_labor_law_%28with_2023_amendments%29_qa_%282%29.pdf.
306. Jordan, Labor Law No. 8 of 1996, as amended, provisions allowing a worker to leave work without notice where the employer or representative assaults the worker, including by sexual harassment, and defining sexual harassment, Ministry of Labor English version with 2023 amendments.
307. Human Rights Council, A/HRC/56/10, paras. 10 and 45, noting amendments to the Human Trafficking Prevention Act and the establishment of the Fund for Assistance to Victims of Human Trafficking. See also Ministry of Justice, Anti-Human Trafficking National Strategy and Executive Plan 2024-2027, https://moj.gov.jo/ebv4.0/root_storage/en/eb_list_page/anti-human_trafficking_national_strategy_and_executive_plan_2024-2027.pdf.

The gap is therefore not the absence of legal tools. Jordan has labor law, work permit instructions, anti-trafficking law, shelters, inspections, and UPR commitments. The gap is the lack of a sufficiently integrated protection pathway that connects these tools when the person at risk is a refugee worker.

5. Current Access to the Labor Market by Group

5.1 Syrian Refugees

Syrian refugees have the most developed labor access model among refugee groups in Jordan. The Syrian work permit framework, including flexible permits, should be acknowledged as a positive and practical model. The Ministry of Labor guide identifies three types of permits for Syrian workers: ordinary work permits tied to a specific employer and profession, temporary work permits linked to wage-for-work or internationally funded projects, and flexible work permits allowing work for any employer in permitted professions within a designated professional group and without geographic restriction.[308]

This model reduces one of the strongest drivers of exploitation: dependence on one employer. If workers can change employers within a permitted professional group, they are less vulnerable to threats, withheld wages, or coercive working conditions. The UPR record reflects international recognition of Jordan's flexible work permit system for refugees, which Costa Rica expresslycongratulated.[309]

The model still has serious gaps. Flexible permits are limited to permitted professional groups. Documentation requirements remain significant. Costs matter. The ILO has reported that full work permit fees for Syrian refugees were reinstated from 1 July, 2024, raising concerns about the impact on both employers and refugees. The system also remains embedded in a non-Jordanian worker framework rather than a refugee protection framework. This means that informality may still expose refugees to enforcement consequences rather than triggering protectionscreening.[310]

The legal reform direction should be to preserve the Syrian model, reduce cost barriers, expand eligible professions where labor demand exists, and build complaint firewalls so that Syrian refugees can report labor violations without fear that their work or residency status will be used against them.

308. Ministry of Labor, The Comprehensive Guide of Principles for Issuing Work Permits for Non-Jordanian Workers, 2026, including provisions on Syrian refugee workers, temporary work permits and flexible work permits, https://mol.gov.jo/EBV4.0/Root_Storage/EN/EB_Info_Page/Comprehensive_Guide_for_issuing_work_permits_11-2-2026.pdf.
309. Human Rights Council, A/HRC/56/10, para. 69, noting that Costa Rica congratulated Jordan on the introduction of a flexible work permit system for refugees.
310. International Labor Organization, Assessing the impact of work permit fees on Syrian refugees and employers in Jordan, 2025, noting the reinstatement of full work permit fees for Syrian refugees from 1 July 2024, https://www.ilo.org/sites/default/files/2025-11/Assessing%20the%20impact%20of%20work%20permit%20fees%20on%20Syrian%20refugees%20and%20employers%20in%20Jordan_New.pdf.

5.2 Iraqi Refugees

Iraqi refugees have not benefited from a comparable structured facilitation model. The UNHCR's data on Jordan identifies Iraqis as one of the significant non-Syrian refugee populations alongside Yemenis, Sudanese, Somalis, and others. Unlike Syrians, Iraqis generally do not appear to have a broad, dedicated refugee work permit track comparable to the Syrian flexible permitmodel.[311]

The protection gap is not simply unequal policy treatment, but that treating Iraqi refugees as ordinary foreign workers can ignore the barriers created by displacement, documentation, lack of safe return options, limited networks, and fear of authorities. The Arabic study outline identifies Iraqi and Yemeni refugees as groups that do not benefit from the same facilitation provided to Syrians and may face higher costs and more difficult conditions.[312]

Jordan should consider extending selected flexible permit features to UNHCR-registered non-Syrian refugees, beginning with sectors where labor demand exists and where Jordan already permits non-Jordanian employment. This would not require full equality with citizens or unrestricted access to all professions. [It would require protection-sensitive administrative instruction recognizing that some refugees cannot safely be treated as ordinary short-term labor migrants.]

5.3 Yemeni Refugees

Yemeni refugees face similar barriers to Iraqis, but with distinct vulnerabilities connected to the continuing effects of conflict and displacement. UNHCR data identifies Yemenis as a significant refugee group in Jordan. The 2024 UNHCR socio-economic survey found that employment among Syrian refugees was higher than among non-Syrian refugees and noted that non-Syrian refugees face greater difficulties where they are excluded from more favorable work permitschemes.[313]

That differential outcome is legally significant. A formally neutral rule may still produce discriminatory or exclusionary effects when applied to people in materially different situations. A Yemeni refugee who cannot obtain lawful work, pay fees, safely complain, and return safely is not similarly situated to an ordinary migrant worker who entered for employment purposes.

Jordan should adopt a limited non-Syrian refugee employment facilitation track. At minimum, this should include reduced fees, clear recognition of UNHCR documentation where national passports are unavailable or expired, access to selected flexible permits, and protection from immigration enforcement while labor complaints or trafficking screenings are pending.

311. UNHCR Operational Data Portal, Jordan, noting registered refugee populations from Syria, Iraq, Yemen, Sudan, Somalia and other countries, and that around 80 per cent live outside camps, https://data.unhcr.org/en/country/jor.
312. IRCKHF, Initial Study Axis document, Arabic outline, sections on non-Syrian refugees, particularly Iraqis and Yemenis, and comparative issues concerning permits, costs, restrictions, risks and access to protection.
313. UNHCR Jordan, Socio-Economic Survey on Refugees in Communities in Jordan, 2024, Vulnerability Assessment Framework, noting lower employment among non-Syrian refugees compared with Syrians, https://www.unhcr.org/sites/default/files/2024-07/2024%20Socio-Economic%20Survey%20on%20Refugees%20in%20Communities%20in%20Jordan%20%E2%80%93%20VAF.pdf.

5.4 Gazans and Temporary-Document Holders

Gazans require distinct treatment. The Ministry of Labor's comprehensive guide defines people of the Gaza Strip as white card holders issued by the Civil Status and Passports Department for Gaza Strip residents. The guide allows people from the Gaza Strip to obtain work permits for first-time issuance, renewal, or change of employer in the occupations of cleaner and loading and unloading worker across all sectors and economic activities, including closed sectors and otheractivities.[314]

The guide also exempts people of the Gaza Strip from work permit fees, additional amounts, import stamp duty, and the retroactive effect of social security benefits. It further lists specialized professions that may benefit from fee exemptions, including auxiliary engineering, medical and allied medical professions, ICT, higher education, banking, insurance, finance, tourism-related coordination, sports, and aviation-related specialized roles, subject to applicable approvals.[315]

These measures are positive. They show that Jordan recognizes the specific documentation and access problem faced by Gazans. However, the framework still carries protection gaps. Access remains dependent on the recognition of white card status. Some pathways appear concentrated in lower-paid occupations unless the worker fits a specialized profession and can satisfy additional approvals. Public reporting in January 2025 also noted a Ministry measure allowing Gazans to obtain work permits using white cards instead of temporary passports.[316]

The reform direction should be threefold. First, Jordan should publish simplified and unified guidance for all Ministry of Labor offices on the documents accepted from Gazans and temporary-document holders. Second, access should be broadened beyond low-wage categories where the worker has qualifications, experience, or an offer in a sector open to non-Jordanians. Third, Gaza-affected persons after October 2023 who cannot return safely should be considered for temporary protection-sensitive stay and time-bound work authorization, without prejudicing Jordan's broader legal position on nationality, residence, or political status.

5.5 Gaza-Affected Persons after October 2023

Gaza-affected persons after October 2023 should not be collapsed into the older category of ex-Gazans or white-card holders. Some may be medical evacuees, family members, stranded persons, persons with expired documentation, or persons unable to return safely. Jordan's UPR presentation itself refers to forced displacement and destruction in Gaza and Jordan's call for a coordinatedhumanitarianresponse.[317]

314. Ministry of Labor, Comprehensive Guide of Principles for Issuing Work Permits for Non-Jordanian Workers, 2026, provisions on people of the Gaza Strip, white cards, work permit exemptions and permitted occupations.
315. Ministry of Labor, Comprehensive Guide of Principles for Issuing Work Permits for Non-Jordanian Workers, 2026, provisions on people of the Gaza Strip, white cards, work permit exemptions and permitted occupations.
316. Jordan Times, Labor Ministry eases work permit rules for Gazans, 23 January 2025, reporting the Ministry of Labor measure allowing Gazans to obtain work permits using white cards instead of temporary passports, https://jordantimes.com/news/local/labor-ministry-eases-work-permit-rules-gazans.
317. Human Rights Council, A/HRC/56/10, para. 18, recording Jordan's statement on forced displacement and destruction in Gaza and its call for a coordinated humanitarian response.

The protection gap is uncertainty. If a person cannot return safely, lacks a clear work authorization pathway, and cannot regularize stay, the risk of informal work and exploitation increases. A temporary protection-sensitive administrative pathway would reduce irregularity and help Jordan manage the situation lawfully. Such a pathway could include temporary stay, limited work authorization, access to labor complaints, trafficking screening, and referral to services.

5.6 Domestic and Agricultural Workers

Domestic and agricultural work should be treated as high-risk sectors. The project's programme goal specifically identifies female domestic and agricultural laborers as a focus. These sectors are often marked by isolation, informal arrangements, seasonal work, limited written contracts, weak inspection coverage, and dependency on intermediaries or employers.[318]

Jordan has issued specific regulation for recruitment offices working with non-Jordanian domestic workers, along with Regulation No. 19 of 2021 on agricultural workers, which defines agricultural workers as persons performing agricultural work for a wage under the supervision and control of an agricultural employer.[319]

The problem is implementation. Domestic work is difficult to inspect because it takes place in private homes. Agricultural work is difficult to inspect because it may be seasonal, geographically dispersed, and mediated through informal labor arrangements. Refugees in these sectors may also fear that complaining will trigger loss of work, permit problems, residency fines, detention, or removal.[320]

Jordan's UPR delegation referred to regular inspection visits to workplaces, occupational safety, prevention of child labor, and exploitation of domestic workers, which provides a good basis for recommending stronger inspection and complaint protocols in these sectors.[321]

318. IRCKHF, Annex 1 Project Description, programme goal identifying migrant workers and refugees in Jordan, with focus on female domestic and agricultural laborers.
319. Jordan, Regulation No. 63 of 2020, Regulation of Offices Working in the Recruitment of Non-Jordanian Domestic Workers, Ministry of Labor English version, https://www.mol.gov.jo/EBV4.0/Root_Storage/EN/EB_List_Page/Regulation_No_%2863%29_of_2020_Regulation_of_Offices_Working.pdf.
320. Jordan, Regulation No. 19 of 2021, Regulation of Agricultural Workers, Ministry of Labor English version.
321. Human Rights Council, A/HRC/56/10, para. 59, noting Jordan's statement on regular inspection visits, work safety, prevention of child labor and exploitation of domestic workers. See also recommendations 136.83-136.85.

6. Main Legal and Protection Gaps

Gap 1: Refugees are Regulated Mainly as Non-Jordanian Workers

The current framework does not sufficiently distinguish refugees from other non-Jordanian workers. Article 12 of the Labor Law treats work authorization through labor-market need, occupational restrictions, fees, and employer-related conditions. For ordinary labor migration, this model is administratively coherent. For refugees, it is incomplete, as it does not account for protection needs, non-returnability, documentation barriers, or fear of authorities.[322]

Recommendation: The Ministry of Labor, in consultation with the Ministry of Interior, the UNHCR, and the Government Human Rights Coordinator, should issue a refugee-sensitive work authorization instruction. The instruction should identify eligible groups, accepted documentation, fee rules, complaint protections, and referral obligations when exploitation or trafficking indicators appear.

Gap 2: Nationality-Based Disparity in Access

Syrians have access to a more developed permit model than Iraqis, Yemenis, and other non-Syrian refugees. This has practical consequences. The Arabic outline correctly identifies this as a comparative issue involving permits, costs, restrictions, risks, and access to protection.[323]

Recommendation: Jordan should extend selected flexible permit features to registered non-Syrian refugees, beginning with Iraqis and Yemenis, in sectors already open to non-Jordanians and sectors with labor shortages.

Gap 3: Work Permit Costs and Social Security Burdens

When permits and related costs are too high, workers and employers have incentives to remain informal. This undermines labor inspection, social security, and access to remedy. The ILO's work on Syrian work permit fees raises concerns about the impact of reinstating full fees in July2024.[324]

322. Jordan, Labor Law No. 8 of 1996, as amended, Article 12, English version with 2023 amendments published by the Ministry of Labor, https://mol.gov.jo/ebv4.0/root_storage/en/eb_list_page/final_labor_law_%28with_2023_amendments%29_qa_%282%29.pdf.
323. IRCKHF, Initial Study Axis document, Arabic outline, sections on non-Syrian refugees, particularly Iraqis and Yemenis, and comparative issues concerning permits, costs, restrictions, risks and access to protection.
324. International Labor Organization, Assessing the impact of work permit fees on Syrian refugees and employers in Jordan, 2025, noting the reinstatement of full work permit fees for Syrian refugees from 1 July 2024, https://www.ilo.org/sites/default/files/2025-11/Assessing%20the%20impact%20of%20work%20permit%20fees%20on%20Syrian%20refugees%20and%20employers%20in%20Jordan_New.pdf.

Recommendation: Jordan should adopt a protection-based fee waiver or reduction mechanism for refugees in vulnerable situations, especially where formalization would reduce exploitation risks. For social security, the Social Security Corporation should develop simplified or subsidized models for seasonal, flexible and informal-to-formal workers.

Gap 4: Residency Fines and Immigration Enforcement in Complaint Access

Residency-related insecurity is one of the most important barriers to remedy. The project description identifies residency fines as a structural driver of vulnerability and notes that they restrict rights and leave people exposed to detention, deportation, and administrative penalties for acts linked to exploitation.[325]

Recommendation: The Ministry of Interior should suspend residency fines, detention, and removal procedures while a refugee worker has a pending labor complaint, wage claim, sexual harassment complaint, occupational safety complaint, or trafficking screening referral. This should be implemented through a written SOP shared with MOL, PSD, courts, shelters, and legal aid providers.

Gap 5: Complaint Mechanisms are not Safe Enough

Jordan accepted UPR recommendations to ensure that workers, including migrant workers, can access competent authorities to submit complaints and grievances against employers. Yet complaint access is only meaningful if workers can complain without triggering immigration enforcement, employer retaliation, detention, or loss of legal status.[326]

Recommendation: Jordan should create a labor complaint firewall. MOL complaint channels should not transmit a refugee worker's unregistered work or residency status to immigration authorities unless there is a serious and lawful reason unrelated to the complaint itself. Anonymous or third-party complaints by CSOs and legal aid organizations should be accepted where direct complaint would expose the worker to retaliation.

Gap 6: Labor Inspection is not Sufficiently Protection-Sensitive

Jordan accepted UPR recommendations to increase inspection visits and ensure protection of workers and access to rights. Inspections, however, can have opposite effects if workers fear that inspection will detect irregular status rather than detect exploitation.[327]

Recommendation: Labor inspectors should be trained to identify refugee-specific risks and trafficking indicators. Inspection forms should include indicators such as document retention, unpaid wages, restriction of movement, threats of reporting to authorities, debt, violence, sexual harassment, excessive hours, unsafe accommodation, and dependency on intermediaries.

325. IRCKHF, Annex 1 Project Description, Situation analysis and activity goal, identifying residency fines, restricted lawful work, vulnerability to exploitation, and trafficking risks as core protection concerns.
326. Human Rights Council, Report of the Working Group on the Universal Periodic Review: Jordan, A/HRC/56/10, 15 March 2024, recommendations 136.3, 136.4, 136.8, 136.9, 136.18, 136.27, 136.67-136.72, 136.77-136.91, and 136.192-136.196.
327. Human Rights Council, A/HRC/56/10, para. 59, noting Jordan's statement on regular inspection visits, work safety, prevention of child labor and exploitation of domestic workers. See also recommendations 136.83-136.85.

Gap 7: Trafficking Risks Misclassified as Labor or Immigration Violations

Jordan has strengthened anti-trafficking laws and strategy, and UPR recommendations support further strengthening. The remaining gap is operational: exploited refugee workers may first appear to authorities as irregular workers, overstayers, or workers outside permit conditions, rather than as potential victims of trafficking or forced labor.[328]

Recommendation: MOL, PSD, the Anti-Trafficking Unit, prosecutors, and shelters should adopt a mandatory pre-enforcement screening SOP. Before any fine, detention, deportation, or employer-transfer penalty is applied to a refugee worker, officials should screen for trafficking and exploitation indicators. Where indicators exist, the case should move into a protection pathway.

Gap 8: Absence of Explicit Non-Punishment Protection

A refugee or migrant worker who breaches work or residency rules because of exploitation should not be punished for conduct directly linked to that exploitation. Without a clear non-punishment rule, victims may avoid authorities and remain under exploitative control.

Recommendation: Jordan should adopt an explicit non-punishment instruction, and eventually, a statutory amendment, protecting victims and presumed victims of trafficking from penalties for irregular work, overstay, employer transfer breaches, or related administrative violations where those acts are connected to exploitation.

Gap 9: No Clear Recovery and Reflection Period

Victims and presumed victims of trafficking need time to recover, obtain advice, stabilize, and decide whether to cooperate with authorities. Jordan's current anti-trafficking strategy emphasizes protection, recovery, integration, access to rights, and prevention of re-victimization. That commitment should be translated into an operational recovery and reflection period.[329]

Recommendation: Jordan should create a formal recovery and reflection period for presumed victims of trafficking and severe exploitation. During this period, the person should receive temporary stay, protection from removal, legal aid, safe accommodation where needed, psychosocial support, and temporary work authorization.

328. Human Rights Council, A/HRC/56/10, paras. 10 and 45, noting amendments to the Human Trafficking Prevention Act and the establishment of the Fund for Assistance to Victims of Human Trafficking. See also Ministry of Justice, Anti-Human Trafficking National Strategy and Executive Plan 2024-2027, https://moj.gov.jo/ebv4.0/root_storage/en/eb_list_page/anti-human_trafficking_national_strategy_and_executive_plan_2024-2027.pdf.
329. Ministry of Justice, Anti-Human Trafficking National Strategy and Executive Plan 2024-2027, including objectives concerning protection, assistance, recovery, integration and prevention of re-victimization.

7. Recommended Reform Package by Institution

Institution	Recommended Action
Ministry of Labor	Issue a refugee-sensitive work authorization instruction covering Syrians, Iraqis, Yemenis, Gazans, and other UNHCR-registered refugees. Preserve and improve flexible permits, reduce cost barriers, expand access to sectors where labor demand exists, publish simplified guidance on accepted documents, and create a complaint firewall.
Ministry of Interior	Suspend residency fines and removal procedures for refugees and Gaza-affected persons while complaints or trafficking screenings are pending. Create temporary stay arrangements for presumed trafficking victims and persons who cannot return safely because of conditions in Gaza or countries of origin.
Ministry of Justice and Courts	Expand legal aid beyond criminal proceedings to cover labor claims, residency-related administrative matters, trafficking-related claims, and compensation. Train judges and prosecutors on non-refoulement, refugee protection, labor exploitation, trafficking indicators, non-punishment, and the specific status of Gazans and temporary-document holders.
Public Security Directorate and Anti-Trafficking Unit	Adopt a mandatory screening protocol before detention, removal, or fine enforcement against refugee workers. Ensure potential victims are referred to shelters, legal aid, medical care, and psychosocial support without requiring immediate cooperation in criminal proceedings.
Social Security Corporation	Develop portable and affordable coverage options for flexible, seasonal, agricultural, and informal-to-formal workers. Treat social protection as a formalization incentive, not as a financial barrier to lawful work.
Labor Inspectorate	Use protection-sensitive inspection tools in sectors with high refugee participation. Inspection should be experienced as a route to wage recovery, occupational safety, harassment protection, and trafficking identification, not a threat of deportation.
Shelters and Service Providers	Admit victims and presumed victims of trafficking or severe exploitation regardless of work permit or residency status. Allow CSOs and legal aid providers to refer cases without exposing workers to immigration enforcement.
Government Human Rights Coordinator	Integrate the reform package into UPR follow-up and mid-term reporting. Track implementation indicators, not only legal adoption.

8. Conclusion

Jordan has the tools to close the protection gap. It has a functioning labor law framework, specialized work permit instructions, experience with flexible permits, anti-trafficking legislation, shelters, inspection powers, and accepted UPR commitments. The issue is that these tools are not yet integrated into a refugee-sensitive protection system.

The recommended reforms do not require Jordan to abandon labor-market regulations. They require Jordan to regulate refugee work in a way that reduces irregularity, prevents exploitation, protects vulnerable workers, and supports lawful economic participation. A protection-sensitive labor framework would help Jordan meet its UPR commitments while reducing the vulnerabilities that traffickers and exploitative employers rely on.

UPR Recommendations Compliance Matrix

This matrix is intended as a separate monitoring tool for UPR follow-up. It can be updated after fieldwork, validation consultations, and government feedback.

Theme	Relevant UPR Recommendations	Current Gap	Proposed Indicator	Responsible Institutions
Harmonization with International Standards	136.3, 136.9	Refugees are regulated mainly through non-Jordanian worker rules without sufficient protection safeguards.	Refugee-sensitive MOL instruction issued.	MOL, MOI, Government Human Rights Coordinator
Vulnerable Groups	136.8, 136.18	Refugee vulnerability is not consistently reflected in work, residency, and complaint procedures.	Written SOP protecting vulnerable refugee workers adopted.	MOL, MOI, PSD
Labor Rights and Complaints	136.4, 136.77, 136.79-136.81	Refugees may fear complaints because of work status, residency fines, or retaliation.	Complaint firewall established and used.	MOL, legal aid providers, labor courts
Labor Inspection	136.83, 136.85	Inspection may not reach agriculture, domestic work, and informal sectors, or may be feared by workers.	Number of protection-sensitive inspections in high-risk sectors.	MOL Labor Inspectorate
Safe and Healthy Work	136.84, 136.88-136.90	Unsafe work, harassment, excessive hours, and weak complaint access persist in informal sectors.	An inspection checklist that includes wage, hours, safety, harassment, and exploitation indicators.	MOL, employers, unions, CSOs
Women workers	136.78, 136.86-136.88	Refugee women in domestic, agricultural, and informal work face gendered risks.	Gender-sensitive complaint and referral protocol adopted.	MOL, shelters, PSD, CSOs
Social Protection	136.8, 136.18, 136.91	Flexible, seasonal and informal-to-formal refugee workers lack affordable effective coverage.	Subsidized or portable coverage model designed.	Social Security Corporation, MOL

Theme	Relevant UPR Recommendations	Current Gap	Proposed Indicator	Responsible Institutions
Syrians and Flexible Permits	136.73, 136.77, 136.80, 136.83	A positive model exists but is limited by cost, occupational restrictions, and incomplete safeguards.	Flexible permits preserved, expanded and linked to safe complaints.	MOL, GFJTU, cooperatives
Iraqis and Yemenis	136.4, 136.77, 136.91, 136.192, 136.193	Non-Syrian refugees lack comparable facilitation.	Selected flexible permit features extended to registered non-Syrian refugees.	MOL, MOI, UNHCR
Gazans and Temporary-Document Holders	136.2, 136.18, 136.77, 136.91	Documentation-dependent access, closed professions, and uncertain treatment of Gaza-affected persons after October 2023.	Unified guidance on Gazan documentation and expanded work pathways.	MOL, Civil Status and Passports Department, MOI
Trafficking Prevention	136.67-136.69	Labor exploitation may be treated as irregular work rather than a trafficking risk.	Inspectors trained on trafficking indicators.	MOL, ATU, PSD
Victim Protection	136.70-136.72	Victims may face fines, detention, deportation, or pressure before recovery.	Non-punishment and recovery/ reflection SOP adopted.	MOJ, PSD, ATU, shelters
Access to Justice for Migrant Workers	136.192-136.194	Language, legal status, and fear of removal restrict remedy.	Legal aid and interpretation available for labor and trafficking complaints.	MOJ, legal aid providers, courts
Civil Society and Follow-Up	136.13, 136.57, 136.58, 136.123, 136.125	UPR follow-up needs evidence and implementation tracking.	Monitoring matrix used in mid-term UPR reporting.	Government Human Rights Coordinator, IRCKHF, CSOs

Annex 6: List of Legislation, Decisions, and Regulatory Documents Relevant to Refugees' Work in Jordan

I. The Constitution and Laws

1. The Jordanian Constitution of 1952, as amended.
2. Labor Law No. 8 of 1996, as amended.
3. Law on Residence and Foreigners' Affairs No. 24 of 1973, as amended.
4. Human Trafficking Prevention Act No. 9 of 2009, as amended.
5. Law Amending the Human Trafficking Prevention Act, No. 10 of 2021.

II. Regulations

1. Visa Regulation No. 3 of 1997, as amended.
2. Regulation on Designating the Place of Residence No. 95 of 1998, as amended.
3. Regulation on Work Permit Fees for Non-Jordanians No. 142 of 2019, as amended.
4. Regulation on the Fund for Assisting Victims of Human Trafficking No. 6 of 2023.
5. Regulation Amending the Regulation on Shelters for Victims of and Persons Affected by Human Trafficking Crimes, No. 46 of 2023.

III. Instructions

1. Disengagement Instructions of 1988.
2. Instructions on the Conditions and Procedures for Employing and Recruiting Non-Jordanian Workers of 2012, as amended.
3. Instructions on Designating the Place of Residence for Non-Jordanians of 2019, as amended.
4. Comprehensive Instructions on the Conditions and Procedures for Employing Non-Jordanian Workers of Syrian Nationality of 2018.
5. Instructions on the Conditions and Procedures for Employing Non-Jordanian Workers of Syrian Nationality of 2020, as amended.
6. Instructions on the Conditions, Qualifications and Technical Classification of Ministry of Labor Inspectors of 2021.

IV. Decisions and Regulatory Arrangements

1. Ministry of Labor decisions on professions and activities closed to non-Jordanian labor, including Decision No. (58/2020) and subsequent decisions amending it.
2. Ministry of Labor Decision No. (46/2021) of 1 July 2021 on the professional groups for workers of Syrian nationality.
3. Ministry of Labor decisions on exempting workers of Syrian nationality from work permit fees, on the conditions for issuing and renewing permits, and on the deadlines set for regularising their status.
4. Decisions and arrangements on issuing flexible work permits to workers of Syrian nationality, including the arrangements for issuing them under the umbrella of the General Federation of Jordanian Trade Unions and accredited cooperatives.
5. Decisions and arrangements on issuing work permits to Syrian refugees living in camps, and on regulating their exit from the camps for work and their return.
6. Government decisions on exempting Gazans from work permit fees, under the prescribed conditions.
7. Ministry of Labor decision announced on 23 January, 2025 adopting the white card in place of the temporary passport for the purpose of issuing work permits to Gazans.
8. Social Security Corporation decision of 18 July, 2021 on social security coverage for Syrian workers holding flexible work permits.

V. Official Guides and Regulatory Documents

1. Ministry of Labor (Jordan), Comprehensive Guide to the Basis for Issuing Work Permits to Non-Jordanian Workers.
2. Ministry of Labor (Jordan), Guide to Work Permits for Non-Jordanian Workers with Specialised Skills.
3. Ministry of Labor (Jordan), Procedural Guide to Issuing Flexible Work Permits to Non-Jordanian Workers of Syrian Nationality.
4. Ministry of Labor (Jordan), Procedural Flyer on Issuing Flexible Work Permits to Non-Jordanian Workers of Syrian Nationality.
5. Ministry of Labor (Jordan), Amended Consolidated Document of Decision No. (58/2020) and Subsequent Decisions on Professions Closed to Non-Jordanian Labor.
6. Ministry of Labor (Jordan), Guide to Inspection Services and Individual Labor Complaints.

