

ANNEX C5

TWINNING INTERIM QUARTERLY REPORT



EUROPEAN COMMISSION

TWINNING PROJECT FINAL REPORT

Project Title: “Organizational Modernization of the Occupational Health and Safety (OHS) Management Systems”

Partners: Ministry of Labour, Health and Social Policies, Tuscany Region, INAIL, ISPESL, Italia Lavoro, Formez [MS]
Ministry of Manpower and Migration [BC]

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SECTION 1: Project data

Twining contract number	EG07/AA/SO07
Project title	Organizational Modernization of the Occupational Health and Safety (OHS) Management System
Twining partners (MS and BC)	<p><u>MS</u> Ministry of Labour, Health and Social Policies, Tuscany Region INAIL ISPESL Italia Lavoro Formez</p> <p><u>BC</u> Ministry of Manpower and Migration</p>
Duration of the project	20 months October 7 th , 2008 – September 6 th 2010
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2A – EXECUTIVE SUMMARY

The **goal** of this project was to support the Ministry of Manpower and Migration in undertaking the relevant legislative and institutional reforms as regards to Occupational Health and Safety services and norms. This project worked on three levels:

1. legislative framework (primary and secondary legislation) by analysing the existing system, by making a comparative analysis of it with EU and international standards, by assessing and providing suggestions to fill the lack in the legislation on the one side and to enforce the implementation of the existing relevant secondary laws on the other side.
2. institutional capacity building of the Occupational Health and Safety Department at central and local level through an analysis of the system of managing OHS, roles and responsibilities, processes, information and knowledge management and proposal for improvements. An organizational development plan was drafted and the short term actions were tested at local level through a pilot project. The pilot project activities worked on three layers: a) data management system and statistics, b) risk factors measurement and measurement devices maintenance and management; c) inspection activities (pre-inspection, inspection and post-inspection). Some of those fields were easy to investigate some others a bit harder due to structural obstacles.
3. National Strategy and Action Plan, training of human resources. This component supported the MoMM on building on a national strategy for OHS and strengthening its human resources (central managers, supervisors, trainers, and local inspectors).

The project has achieved most of the **results** foreseen; however its impact was affected by several elements beyond the control of the project staff. Firstly legislative reforms that required the approval of ministerial level were never implemented; secondly, a system to collect data at local level was never set up, thus it could not be tested during the pilot project (even though training on digitalization of forms and registers for electronic data collection and management had been performed); finally, due to great delays in approving the National OHS strategy, not enough time was left to prepare the investment plan.

Major interventions are still needed. This project could only be considered a first step towards the actual modernization of the OHS management system in Egypt; it is just the starting baseline. Further support however should come on the condition that the MoMM endorses major changes: pending activities should be completed¹, and major reforms in terms of organizational and technical aspect should be implemented such as formalizing OHS Dep. organizational chart, with clear job descriptions, responsibilities, roles and procedures, for the former, and preparing the path for further reforms on the latter (signing Protocol with the National Standardization body and other ministries providing inspectors with all the tools necessary to successfully perform their tasks, performing a roadmap of the equipment available nationwide, and so on).

¹Refer to Section 2F '*Follow-up and sustainability*': approval of legislative amendments, and statistical system testing in the pilot project; application of the results of the pilot project (in terms of organizational modification and statistical system set up) to other 28 Governorates; drafting of a road map to endorse major organizational changes; and building synergic actions with other institutions responsible for OHS.

2B – BACKGROUND

Starting point

The OHS General Administration of the Ministry has the main role of inspecting the industrial work places at local level and issuance of sanctions for violations of legal and conventional norms for public and labour safety, health and environment protection. The **legal base** for OHS laid in chapter V of the Labour Law n. 12, 2003, that together with ministerial decrees n. 211, 134, 126, regulated occupational health and safety in Egypt. The project fiche defined the implementation of the legislation still at a *rudimental level*, highlighting the need of approximation to ILO conventions and EU legislations on the one hand, and on the other hand the need to actual enforce mechanisms and practices for OHS management.

In terms of **administrative set up** and **capacity** many challenges hindered the performance of the Ministry and its inspectors. Despite what described in the project fiche, the experts found out that the chain of command was not well defined, local OHS offices at governorate level were administratively subordinated to the OHS Central administration while being financially subordinated to the Governorates, the 14 research units played a very little role, and horizontal overlapping between Ministries in charge of managing specific aspects of OHS existed. In terms of inspectors' competencies, lack of specific skills in sectors such as agriculture, transportation, construction work existed, inaccuracy and delay in collecting and analyzing fatal accidents data were reported, together with little motivation of inspectors due, among others, to bad working conditions (shortage of vehicles and equipment). The project fiche mentioned all the above aspects as crucial obstacles to a proper implementation of OHS policies throughout Egypt, but did not specifically address all them as object of the twinning project.

Objectives

Overall objectives

The **overall objective** of the project was to “*contribute to the improvement of the Occupational Health and Safety policies, procedures and services, hence improving the system on OHSM aimed at reducing the number of work-related accidents and incidents in Egypt²*”. The project's more specific **purpose** was to “*support the Ministry of Manpower in undertaking the relevant legislative and institutional reforms as regards to Occupational Health and Safety services and norms to ensure an effective implementation of its mandate, to improve, and promote labour safety through enhancing a culture of prevention, health and welfare of employees, as well as to safeguard the public from being exposed to work activities entailed risks³*”.

In order to achieve its objectives and purpose, the project was organized in **three components**. Each component tackled specific areas of intervention related to OHS management and proposed improvements to the existing situation.

² Twinning Contract: Project Overall Objective as stated in the workplan (pg. 15)

³ Twinning Contract: Project Purpose as stated in the workplan (pg. 15)

Component 1 focused on the **legislative system**. It aimed at *“improving the legislative framework of OHS, and enforcing the relevant secondary laws with respect to implementation aspects of occupational health and safety”*⁴.

Component 2 focused on institutional capacity building, **processes, procedures, and workflows** both at the Ministry central level and at the local one. The aim of component 2 was to *“strengthen the institutional capacity of the Occupational Health and Safety Agency and its inspectors at central (National) level and at local (Governorate) levels through a pilot project”*. Finally **Component 3** focused on *contributing to the implementation of reform changes at governorates level through a comprehensive National strategy and action plan”*.

Despite the existing laws, the problems and challenges encountered were mainly due to the lack of secondary legislation required to enable standardized inspections, to the limited capacity of inspectors, and to the inadequate facilities and equipment for data collection and data transfer. The project tackled and tried to fill in most of the gaps, even though the real situation faced by the MS experts was worse than that expected in the project fiche: little decisional power, great capacity constraint, and shortage of equipment were problems that the team had to face throughout the project and that required prompt and flexible responses/solutions.

2C – IMPLEMENTATION PROCESS

Developments outside the project

Even though most of the results of the project were achieved during the project’s lifespan, broad objectives and overly ambitious results made the actual developments of OHS policies in Egypt little likely to happen. Indeed in order to have a concrete impact on Egypt OHS Policy, the implementation of most of the achieved output required time-consuming approval procedures and inter-ministerial cooperation. Several elements were beyond the control of the project and its key actors. Hence, given the need of direct involvement of high political level and the ongoing lack of cooperation among OHS stakeholders, both during the project design and its implementation, it has always been very likely that the implementation of the project outputs would have encounter problems, undermining the achievement of its objectives.

Regardless practical constrains for the implementation of each component, that will be discussed in more details in the next session, and regardless the fulfilment of the project’s original assumptions *“Political commitment towards the improvement of the OHS sector in Egypt”*, and *“appropriate level of coordination among stakeholders of OHS in Egypt and willingness to improve interlinked processes, procedures, and communication flow”*, that strongly affected the impact of the project, many steps were put forward.

A document named **“Cairo declaration”** agreed between MoMM, WHO and ILO, formalized the mission and expressions of interest of the three actors to support a healthy and safe working environment. The document was signed by HE, representative of organization of employers, the Arab labour organization, the WHO and the ILO during the national day for Occupational Health and Safety. The document represented a milestone for the **National Strategy for OHS**. The Cairo declaration not only showed the interest of

⁴ Twinning Contract: Result 1 (pg. 16)

the MoMM to formalize its effort towards increasing OHS and working conditions throughout Egypt, but was the first step towards an active cooperation between the MoMM and ILO and WHO.

Throughout the project, the MS stressed the need of synergic actions in order to spread out a culture of prevention and to effectively implement organizational reforms. Even though other stakeholders, such as the Ministry of Health, the Ministry of Insurance, the Ministry of Environment, as well as the National Institute for Occupational Health and Safety, and the Standardization Body, had not been involved neither during the project design, nor during its implementation (during the discussion of legislative reform proposals, drafting of management procedures and inspecting practices and so on); and even if the cooperation laid upon factors, mainly organizational, beyond the control of the project, some achievement were reached paving the ground for future cooperation.

The **National Institute for Occupational Health and Safety**, as main carrier of research expertise, successfully contributed to the implementation of the pilot project, by providing measurement equipment for noise and dust, researchers' expertise, and laboratories infrastructures to analyze sampling measured in establishments. Protocols with the **National Standardization Body** (to provide local inspectors with updated technical standards to perform inspections), with the **Ministry of Health** and that of **Environment**, to define role, responsibilities and agree on common definitions, were being discussed. No further update on this issues were however available.

Moreover, the project supported the Ministry of Manpower and Migration in setting up cooperation with the **TVET Program** and the **Ministry of Investments**. With the former in order to set up a cooperation between the Ministry of Manpower and Migration and the relevant actors in the educational field, namely the Ministry of Education, on the one hand, and the technical and vocational training providers on the other, to create a common strategy on developing training, education curricula on OHS, and enhance public awareness targeted to future workers. The latter, since the Ministry of Investment while revising the national Corporate Social Responsibility strategy, could have supported the Ministry of Manpower and Migration in some of its reforms by inserting a chapter on OHS in the national strategy for Corporate Social Responsibilities.

Despite the initial resistance of the MoMM in applying some of the project's recommendations, a clear willingness to enhance the results of the project appeared. Unfortunately loose political commitment resulted in little responsiveness if not in a weak application of these modifications.

Most external problems were due to the capacity constraints of the MoMM, in terms of technical equipment availability and human resources, both not directly dependent to the MoMM nor shortly modifiable, and to the lack of coordination among all institutions responsible for OHS in Egypt. It is true that the objective and goals of the project were too broad and fuzzy for the subject being treated, especially if targeted only to one Ministry, however most of the external problems were related to the underlying assumptions and had been discussed in the previous section of the report.

Project developments

Almost all of the results of the project had been achieved. Primary and secondary legislation had been revised and drafted trying to make up for the sectors that were not regulated by the existing legislation, and to overcome some practical application obstacles. An overall new system for labour inspectorate had been defined both at central and local

level, an organizational development plan was agreed, workflows, performance indicators, standardized inspecting procedures were drafted and tested on the field (for inspection on dust and noise measurement). A national strategy was drafted, and massive training activities had been delivered to both trainers of inspectors and inspectors, being them supervisors or managers, at both central and local level. The details of these activities will be discussed in section 2D.

The project experienced many internal problems, some transversally affected the overall implementation of the project (availability and number of BC staff involved, availability of specific competences, scarce coordination of activities between MoMM central and local level, little sharing of information and dissemination of results, high turnover of the key players involved in the project implementation - RTA, PLs), and some were specific to each component. They all threatened to a different degree the effectiveness of the intervention, more likely reducing the magnitude of its impact.

For **Component 1**, when it became clear that the legislative reforms could not be endorsed by Decrees and Act directly issued by the OHS General Department but needed the formal approval of the Supreme Council, it was also clear that very little steps forward would have been made. The Supreme Council indeed had met once, one year, if not more, prior to the starting of the project, and never met during its implementation. Moreover the lack of cooperation and dialogue between the different Ministries responsible for drafting legislation on OHS and enforcing it might lead to delays and difficulties in implement the proposed reforms.

For **Component 2**, capacity constraints (reforms of the organizational structure and Human Resources of both offices at central and local level were needed), lack of resources and of basic logistical and communication infrastructure reduced the impact of the Component 2 interventions. Finally the lack of a clear institutional policy strategy, mission, and goals reduced the scope of **Component 3** and delayed the achievement of its results. Some major problems in the implementation of the pilot project however would have had a greater impact on the project's results, had not the PAO stepped in to provide some of the equipment needed.

Specifically, the project had to face great difficulties in the actual implementation of the pilot project in the governorate due to the lack of equipment, transportation means and resources. Given the situation, for the sake of the project, the Member State supported the involvement of NIOSH (National Institute for Occupational Safety and Health) to provide the expertise and equipment needed to implement the pilot project as foreseen. This solution however would have had a short term impact, unless the PAO had not intervene to finance the buying of some of the equipment used during the pilot project, on which BC staff were trained.

Project visibility

Besides the usual kick off and final conferences that were organized to launch and to present the final results of the project respectively; different channels provided visibility to the project and to the EU. One was directly linked to communication and awareness campaigns foreseen as activities of the project, and the other had to do with media and multimedia channels.

During the implementation of the project, indeed, two activities of component 3 directly dealt with developing the external communication functions of the OHS department and with organizing a communication campaign to raise awareness among stakeholders.



During the implementation period, the project supported the MoMM in its external communication functions by providing technical material, and expertise for the definition of brochure, of layout and contents, and by drawing a logo (see image) to be used for campaigns and information seminars nationwide.

Moreover, towards the end of the project, the two project leaders. As agreed on the need to make all the materials available to the public, where by public we meant the Ministry's functionaries both at central and local level, and other stakeholders. This to reaffirm the many-times repeated idea that occupational health and safety should be a culture, more than a rule; a way of conduct and practice. We thus decided to link to the MoMM web page, few pages on the project. Specifically four pages that described the project, detailed its activities, presented the results achieved, and made available all the training materials for download (<http://www.manpower.gov.eg/italy/SITO/home.html>). This website will ensure the visibility of the project in the years to come.

Finally, around March, the Ministry of Manpower got involved in a television and radio show on OHS, in both occasions the project was presented by either the RTA or BC experts.

2D – ACHIEVEMENT OF MANDATORY RESULTS

Component 1 was organized in three activities. Through a compared analysis of the Egyptian primary and secondary legislation against that of the European Union and of Italy (as example of approximation of EU legislation at national level) (Activity 1), and the identification of priorities areas of interventions, BC and MS experts proposed adjustments and amendments to the national OHS legislation (Activity 2 and 3). Then, under Component 2 a deeper analysis of the reasons behind the difficulties in implementing the Egyptian legislation was performed leading to proposing changes focused on improving the procedures related to inspections, thus the “Procedural Manual for OHS inspectors”.

Component 1 activities achieved all of its results; even though the reforms were not endorsed by the Government nor entered into force since they needed the formal approval of the Supreme Council.

For more details on the recommendations and rephrasing of part of legislative text or on the needed integration please refer to the **Output of Component 1**⁵ and some of the recommendation formulated under **Component 2**⁶.

Component 2 was organized in two parts, the first one implemented at **central level** (from Activity 1 to Activity 6) and the second one at **local level** (from Activity 7 to Activity 12); the latter comprising also a pilot project. This component aimed at introducing measures to

⁵ For specific proposals of adjustment refer to Output 1.2 “*Proposal of adjustments of Egyptian primary and secondary legislation*” and to Output 1.3 “*Assessment report on Egyptian legislative system on OHS*” where further recommendations are formulated.

⁶ For specific proposal refer to Output 2.10 “*Organizational modifications of modes of operation of the labour inspectorate and other actors and definition of desired situation*” where amendment to Decree 211/2003, Decree 134/03 (Inspection activity/Measurements Strategy) and Decree 129/07 (Procedures and inspection activity) are discussed.

encourage improvements in the inspectors' activities, by strengthening the capacities of the MoMM, and that of its frontline employees and improving behavioral practices during inspections. Component 2 followed the general principles of management system specific to OHS such as hazard policies and procedures, accident investigation and reporting, auditing, inspections, risk assessment, risk control, and data collection. Among the results achieved at **central level** were: definition and improvement of the system for labour inspectorate at central and local level; standardization of procedures in support of the labour inspectors; definition and improvement of work flows, performance indicators and measures points at governorate level; improvement of organizational performance and work modalities against specific benchmarks agreed with the BC and identified after monitoring internal audit functions, and report; and improvement of data collection. As a result of the activities carried out at central level an organizational development plan was drafted, with short- and long-term goals. The former would have been tested at local level during the implementation of the pilot project. For that purpose three macro areas of interventions were identified:

- 1) data management system and statistics;
- 2) risk factors measurement and measurement devices maintenance and management;
- 3) inspection activities (pre-inspection, inspection and post-inspection).

Throughout the implementation of Component 2, several corrective actions for each specific macro-area of intervention were formulated, as well as practical recommendation on how to implement the existing legislation. As previously stated the NIOSH and its researchers were involved in the second phase of this component to provide the technical expertise and equipment to perform the inspection activities in companies and worksites together with MoMM local staff.

Finally **Component 3** worked both on a strategic level, and on capacity building. The former developing a comprehensive national strategy (Activity 1) with its action plan and five years investment plan (Activity 8); the latter focusing on strengthening the MoMM staff competencies and expertise related to specific roles and duties through side by side work and direct training.

The activities related to the strategic level, to the action plan and to the investment plan experienced great delays. As previously discussed, strategic decisions were on the one hand difficult to take, given the little decision making power of the actors involved, and the budget constrains. Decisions and proposals, even though agreed, had been rarely formalized until the very end of the project. The strategy was delivered, even though no investment plan was formalized. Training activities on the other hand experienced some delays due to co-financing budget issues but were in the end completed with the satisfaction of all participants and as foreseen in the contract. Actually more training modules were delivered and more training subjects were covered compared to those identified in the Twinning Contract.

Results of **Component 1** were achieved, even though no formal endorsement of the proposed reforms was achieved. The BC experts agreed on submitted the requests to the Supreme Council, that indeed never met since the beginning of the project. The approval of the proposed reforms is still pending.

Component 2 Activity 4 aimed at developing an information and knowledge system, which however was not completely tested in the pilot project. Under Activity 4 indeed, MS and BC experts worked on the setting up of a system for data collection and analysis that, starting from the Italian experience, took into consideration the local scenario. Given the

overall situation, once agreed on data format, work-flows and procedures, two proposals were made: one to implement a comprehensive system online, and another to collect data in an offline system that would have been uploaded, weekly or once a month, into the main central system of the MoMM. The Ministry decided to work only on the first proposal. However, due to organizational problems during the implementation of the pilot project, not all offices were equipped with internet connection and computers to send the data at the central level. The training on digitalization of forms and registers for electronic data collection and management activity was performed, but little data entry reached the central level. Hence the test conducted in OHS local offices did not provide a satisfactory data level to support the definition of guidelines and training activities to elaborate statistical report at central level.

Finally **Component 3** Activity 8 did not reach the expected results. As already mentioned in the last two quarterly reports, the delay in endorsing the OHS National Strategy, which was formalized together with the Cairo Declaration towards the very end of the project, did not give enough time to experts to engage in the writing of the investment plan. Moreover the lack of cooperation among Ministries and little shared policies views within the MoMM and among stakeholders of OHS interests did not help the definition of a common strategy.

2E – IMPACT

The component activities focused on achieving the purpose and the overall objective of the project by contributing to policies, procedures and services to improve OHS management systems, leading in the long run to the reduction of work accidents. In doing so the project supported the Ministry in undertaking the relevant steps towards legislative and institutional reforms, as well as organizational improvement to ensure an effective implementation of OHS policies.

However firstly, the real situation that the project had to face was much worse than that expected, secondly, the overly ambitious goals and the poor project indicators did not help benchmarking the progress of the project towards its final goals. In this context, the concrete implementation and actual use of the results was endangered by the limited administrative power of the OHS General Administration to actually shape policies and endorse legislative and organizational changes. The approval and enforcement of legislation and the availability of the required technical facilities and equipment to apply the modified procedures, required substantial investment as well as cooperation and coordination within the MoMM and between relevant institutions, which is discretionary to the MoMM. Until now it is not clear whether the MoMM will be able and be willing to undertake the necessary steps to apply those changes.

Besides the expected results as described in details in section 2D, the project produced a webpage, that had been added to the MoMM main webpage. The webpage goal was to share with all organizational levels of the MoMM the materials used (i.e. training materials), in order to make the knowledge and the expertise available to everyone. Moreover many working groups with other institutions directly or indirectly involved in OHS had been organized, emphasizing the need of synergic actions.

2F – FOLLOW-UP AND SUSTAINABILITY

Some steps were put forward in order to facilitate the sustainability of the results. Setting up a webpage exactly aimed at ensuring visibility, dissemination and sharing of the results, especially when concerning training activities.

Generally speaking, we agree with what was stated by the EU monitoring team *“sustainability of project results depends very much on the approval of the outputs (legislation, procedures, strategy, action plan), on the enforcement of Decrees, and on the allocation of substantial resources. [...] Given the weak status of the OHS General Administration within the MoMM’s administrative structure and the lack of basic infrastructure, particularly at the local level, institutional and financial sustainability is weak. The weak cooperation within the beneficiary institution as well as with other relevant ministries strongly support such doubts⁷”*

In order to ensure the sustainability of the results further steps are needed. The Ministry of Manpower and Migration should:

1) complete pending activities

- a. modify the legislative framework by receiving the formal approval of the **legislative amendments** agreed under component 1 and component 2
- b. complete the **pilot project**: not all organizational changes for the local offices had been tested. It was not possible for OHS Local offices to perform data entry in a unified system, the **statistical component** of the pilot project could not be completed nor the data flow from Local OHS offices to the central level completely in place and tested.

2) set up a system to **disseminate the results achieved under the pilot project**. The pilot project indeed was designed to test new procedures at central and local level. It was implemented in one governorate, but it was thought to be applied nationwide, in all other 28 governorates of Egypt. Thus an adequate tutoring to Local OHS inspectors throughout the other 28 Governorates should be guaranteed.

3) **design a road map** to endorse organizational major changes proposed. Besides the definition of a long term strategy and more specifically of the tools and means available to achieve it, the Ministry need to work on its long-term goals, in order to have a **single strategy** throughout Egypt (by central and local inspectors of MoMM) on the one hand, and shared by all subjects on the other hand.

4) keep on working on **building synergic actions** within the MoMM⁸ and with other institutions responsible for OHS to provide inspectors with all the tools necessary to successfully implement their tasks (through Protocols with the Standardization Body, and cooperation with the NIOSH) and to crate a common and shared strategy to manage OHS and avoid overlapping of responsibilities (through mainly agreements with the Ministry of Health, of Environment, of Insurance, of Education, and so on).

⁷ Monitoring report issued for the visit that took place from May 23rd to June 3rd 2010.

⁸ With the Statistics Dep. and with the Training Department for instance, in order to establish baseline data on OHS and to deliver further training to inspectors.

2G – CONCLUSIONS

Overall Assessment

The project has achieved the results foreseen and has strongly benefited from the MS and BC expertise. The scheduled activities had sometimes experienced delays, some of which were solved thanks to the 2 months extension. The impact of the project was affected by several elements beyond the control of the project staff, reforms that required the approval of ministerial level for implementation and that, lacking it, did not allow to completely respect the results as outlined in the twinning contract. As described in section 2F and in section 2H of this report, specific sectors require further support that should be provided “under certain conditions”. Certain conditions indeed need to be in place to ensure the effectiveness of further interventions.

2H – FINAL RECOMMENDATIONS

Lesson learned

During the **preliminary phase** and **project design**: the overall context of working in the beneficiary country should have been better described and shared between MS and BC; project goals should have been less ambitious and more realistic (overly ambitious goal and purpose do not help design the project’s activities and risk not to be achieved within the project implementation period). The staff of the beneficiary institution should have been trained on the twinning project instrument (PCM, logical framework, etc.) in order to understand the added value that the project could have brought to the institution, and better contribute to the project design. A well designed project, indeed, adapts and responds to the actual needs of the beneficiary institution. MS experts bring in their technical competencies and expertise in how to set up the activities and what is generally needed in order to intervene in legal approximation and capacity building, but only the BC staff knows the actual situation of the local institution, the context where policies need to be applied, the constraints and difficulties behind implementing reforms that the project will have to face. Finally a great number of BC staff should have been involved, they should have been appointed to the project since its beginning, and have a clear and defined role within the project and within the institution. A good team group should usually be diverse and comprise for mixed people, some with good seniority and some other younger officials. Moreover there should have been an overall strategy for Human Resources management. Concerning Human Resources planning, for instance, our project delivered many training sessions on different issues, no strategy behind the attendance of the modules – being it competences-driven or regional - occurred and no plans on the trainees’ participation had been presented. All participants enjoyed and took advantages of the courses, but we believe that the impact could have reached a greater extent if better planned. Finally a co-financing budget should have been shared and committed to the project to emphasize the intent and commitment of the institution towards the project.

During the **implementation of the project**: massive coordination activities were needed, within different departments of the beneficiary administration, between different administrations involved, with the EU and the PAO. The more the information was shared, the more every subject involved contributed to the achievement of the goals, the more

spread out were the results, and the greater the impact of the project. Great and clear planning needed to be shared between BC and MS to have a baseline for means, staff and equipment to be used. Great flexibility and adaptability were needed during the implementation of the project, but it was utterly important to have a detailed common plan that could have then been adapted to specific needs.

Recommendations

This twinning project served only as a first step towards the achievement of its overly broad goals. As previously highlighted the MoMM needs to take many steps to actually apply some of the results achieved. Further support is thus needed.

However clear **conditionalities** for any follow up intervention should be defined to ensure the commitment of the MoMM towards improvement, to create ownership on the results and to ensure that the follow up interventions will start from the baseline set up by this project.

Firstly, the MoMM should keep on working on the pending activities described in section 2F "*Follow up and sustainability*" of this report, namely to complete pending activities (approval of legislative amendments, and statistical system testing in the pilot project), to apply the results of the pilot project (in terms of organizational modification and statistical system set up) to all other 28 Governorates, to design a road map to endorse some of the major organizational changes, and to work on building synergic actions with other institutions responsible for OHS in Egypt.

Moreover activities showed that major improvements are still needed both in organizational aspects of managing OHS as well as in technical ones.

In terms of **organizational aspects**, redefinition of roles and responsibilities is essential. The General Administration of OHS is one of the three Administration, namely OHS, Labour Inspection, and Labour Services, under the 'Central Administration for Welfare and Labour Protection'. The Administration has a flat hierarchy, with only the Head of the GOSH, Mr. Hemly appointed (with a one-year mandate, which does not ensure any continuity of intervention). Neither specific functions nor roles are defined, and formalized. The MoMM is not really aware of the human resources available at local level (nor of their specializations) and does not exercises too much control on the hiring of local inspectors. This is mainly due to the dichotomy between Central level and Governorate level, and leads to difficulties in implementing a single strategy of enforcing OHS legislation nationwide⁹.

In order to strengthen the role of the OHS Administration and its capacity to endorse its mandate, clear job descriptions, responsibilities, roles and procedures need to be defined. Component 2 Activity 1 drafted an organizational chart and analyzed the system in place; the project worked on the definition of specific functions needed and on the transfer of expertise to MoMM officials without clearly knowing who was responsible for what. Defining job positions, roles, responsibilities, competences needed and appointing officials to each of them should be a priority.

⁹ For a better understanding of the practices related to OHS inspectors, hiring, training, etc. refer to paragraph 4 of Output 2.1 on the analysis of the MoMM system.

Moreover, in terms of **technical interventions** different fields should be further investigated and supported:

- 1- data management system (a. to manage the overall performance of the Local Offices of OHS by query on procedures that show the total number of inspections carried out during a specific period, b. to gather unified data from local OHS office throughout Egypt, c. to assess and analyze data in order to map risks in specific sector and shape targeted and ad hoc OHS strategies);
- 2- risk factor measures and measurement devices (to make international standards available to all inspectors through a Protocol with the National Standardization body¹⁰), roadmap of equipment available nationwide (at governorate and central level¹¹) and measurement campaigns to calibrate all existing instruments (drawing up guidelines if needed; A budget committed to maintain measurement devices should be yearly foreseen);
- 3- inspecting activities (a. drawing up operating instructions for the correct use of the available instruments, starting from the operational guidelines on noise and airborne dusts used during the pilot project, b. on the job-training to align all inspectors' performances);
- 4- the tripartism model supported by ILO: dialogue, synergy and cooperation among the central Dep. of OHS and other concerned administrations, governmental bodies, employers and workers should be maintained and encouraged.

Besides the major reforms, which are usually time-consuming activities and have long-run goals, some simpler but utterly important activities can already be supported; we mainly refer to both the setting up of a statistical system¹² on OHS data and the implementation of a calibration campaign nationwide.

¹⁰ The GOHS should collect all international standards concerning Risk Factors measurements, keep them updated and make them available to all LOHSI on demand. International standards indeed are needed when planning the measurement campaigns.

¹¹ Keep in mind that Governorates have their own budget that can use to buy equipment for their local offices.

¹² The project developed data format, work-flows and procedures; then two proposals to implement the system nationwide were discussed: implementing an online internet based system or to collect data in an offline system that would have been uploaded weekly or once a month into the main MoMM central system. Neither way was put in place.

The issue of statistical system is tricky, major interventions should be undertaken. First of all because it is utterly important to perform data analysis to understand trend thus shaping policies, second of all because building a reliable set of data takes time. There is an urge for interventions, which could be performed at two levels: first of all building a system and setting it up so that it will be used from now on; second of all feeding this new system with existing data (thus entering old data into the new system and by doing so, building an historical data base). Moreover lacking major infrastructures, internet connection, computer and equipment, different solutions to implement such systems should be investigated. One hypothesis was to create mobile workstations that move around different DOSH and LOSH to retrieve data from OHS offices; their work could be organized regionally or per areas.

2I – ANNEXES**Annex 1 – Overview mandatory results achieved**

		Expected mandatory result (Components)	Original deadline	Actual deadline	Expected benchmarks (Activities)	Self-assessment Rate ¹³
Component 1						
C1	Assessment of legal compliance, legislation approximation, and better secondary law enforcement	Improving the legislative framework of OHS, and enforcing the relevant secondary laws/directives with respect to implementation aspects of occupational health and safety	Month 4 (Feb. '09)	Month 4 (Feb. '09)	<ul style="list-style-type: none"> - Production of a summary table comparing International/EU/ and Egyptian laws - Assessment report on Egyptian legislative system on OHS (primary and secondary laws, difficulties in implementing secondary legislation) - Proposal for legislation approximation to EU aquis/ILO Conventions delivered 	S
C 1.1	Comparative analysis of EU, Italian, and Egyptian primary and secondary legislation in the field of occupational health and safety, analysis of the reasons behind the difficulties in applying and implementing the existing Egyptian laws, highlighting similarities and possible approximations of the Egyptian law		Month 2 (Dec. '08)	Month 2 (Dec. '08)	Analysis performed	HS
C 1.2	Proposed adjustment and implementation of Egyptian OHS legislation and policy		Month 3 (Jan. '09)	Month 4 (Feb. '09)	Plan for legislative and regulatory reform developed and endorsed by the government / documents prepared and submitted to relevant authorities	S
C 1.3	Legal and regulatory assessment report and analysis of the reasons behind the difficulties in applying and implementing the existing Egyptian laws		Month 4 (Feb. '09)	Month 4 (Feb. '09)	Assessment report on Egyptian legislative system on OHS (primary and secondary laws, difficulties in implementing secondary legislation)	HS

¹³ HS (Highly satisfactory), S (Satisfactory), U (Unsatisfactory)

		Expected mandatory result (Components)	Original deadline	Actual deadline	Expected benchmarks (Activities)	Self-assessment Rate ¹⁴
Component 2						
C2	Institutional Capacity Building at Central and Local Levels	Strengthening the institutional capacity of the Occupational Health and Safety Agency and its inspectors at central (National) level and at local (governorate) levels through a pilot project	Month 18 (Apr. '10)	Month 20 (Jun. '10)	<ul style="list-style-type: none"> - An overall new system for the Labour Inspectorate is defined at central and local level and in place - Standardized procedures in support of the labour inspectors work are created - Work flows, performance indicators (carried out applying the Six Sigma methodology), measures points at governorate level are improved - Improved organizational performance and work modalities against specific benchmarks agreed with the BC and identified after monitoring internal audit functions, report and recommendations - Improvement of data collection finalized to prevention measures 	HS
C 2.1	Analysis of current system (diagnosis), responsibilities and roles at central and local level		Month 5 (Mar. '09)	Month 3 (Jan. '09)	Diagnosis performed	HS
C 2.2	System management and institutional development at central level		Month 5 (Mar. '09)	Month 5 (Mar. '09)	Draft on integrated working systems discussed and agreed	HS
C 2.3	Organizational audit at central level		Month 7 (May '09)	Month 7 (May '09)	Verification and implementation of the state of art in organizational audit. Audit conducted	S

¹⁴ HS (Highly satisfactory), S (Satisfactory), U (Unsatisfactory)

	Expected mandatory result (Components)	Original deadline	Actual deadline	Expected benchmarks (Activities)	Self-assessment Rate ¹⁴
C 2.4	Development of an Information data and Knowledge Management taking into consideration the Italian experience	Month 7 (May '09)	Month 8 (Jun. '09)	Effectives strategies for safety and hygiene developed; wellness programs designed; standardize reports produced	S
C 2.5	Development of the Advisory Role of the Labour Inspectorate	Month 8 (Jun. '09)	Month 8 (Jun. '09)	Role of OHS department with respect to other stakeholders is well defined	S
C 2.6	Drafting of an Organizational Development Plan	Month 8 (Jun. '09)	Month 11 (Sep. '09)	National OHS Policy framework defined; practices and procedures designed, new working instructions structures and processes adopted	HS
C 2.7	Analysis of the present working method of the Labour Inspectorate at local level	Month 10 (Ago. '09)	Month 14 (Dec. '09)	Analysis performed	HS
C 2.8	Development of work flow, performance indicators, and measures points for labour inspectorate, enabling benchmarking on governorate level	Month 15 (Jan. '10)	Month 15 (Jan. '10)	Work flow at local level defined and performance indicators designed (by applying the Six Sigma methodology) accepted and endorsed by the MoMM	HS
C 2.9	Data collection at governorate level for actual assessment, using performance indicators	Month 16 (Feb. '10)	Month 16 (Feb. '10)	Data and information needs reviewed; data flows defined; data consolidation plan developed	U
C 2.10	Organizational modifications of modes of operation of the labour inspectorate and other actors and definition of desired situation	Month 13 (Nov. '09)	Month 17 (Mar. '10)	Adjustment measures defined, agreed and endorsed by the MoMM	HS
C 2.11	Improvement of the work performance of labour Inspectorate of the selected governorate against well defined benchmarks	Month 15 (Jan. '10)	Month 20 (Jun. '10)	The design and work performance improvement plan is defined	S
C 2.12	Evaluation report on Pilot results is developed	Month 20 (Jun. '10)	Month 20 (Jun. '10)	Increase in the efficiency of the governorate performance, in terms of responsibilities, work flow of information, data collected by the governorate	HS

	Expected mandatory result (Components)	Original deadline	Actual deadline	Expected benchmarks (Activities)	Self-assessment Rate ¹⁵	
Component 3						
C3	Development of a National Strategy, including an Action Plan including investment for equipment	Contributing to the implementation of reform changes at governorates level through a comprehensive National Strategy and Action Plan including investment plan for equipment for OHS development	Month 17 (Mar. '10)	Month 20 (Jun. '10)	<ul style="list-style-type: none"> - A Plan for a national roadmap, developed and signed by MoMM - Training of supervisors, managers, and inspectors - Availability of an investment plan for equipment 	S
C 3.1	Strategy on OHS		Month 8 (Jun. '09)	Month 20 (Jun. '10)	Guidelines and reception of documents on OHS strategy on the base of the results of Components I and II and implementation plan developed	S
C 3.2	Development of the external communication functions of the OHS		Month 9 (Dec. '09)	Month 9 (Dec. '09)	Needs assessment on the basis of previous campaign; design of communication and promotion plan at national level, set in the place of the focal point, appointment of the members of the team	S
C 3.3	Implementation of communication plan		Month 9 (Jan. '10)	Month 20 (Jun. '10)	First international event organized, awareness campaign launched, information days for enterprises representatives and workers organized	HS
C 3.4	Design of training plan for supervisors of inspectors (at central level), managers and		Month 11 (Feb. '10)	Month 11 (Feb. '10)	Training plan for OHS managers and supervisor of inspectors at central level designed; training course for OHS managers defined; training course for supervisor of inspectors defined	HS

¹⁵ HS (Highly satisfactory), S (Satisfactory), U (Unsatisfactory)

	Expected mandatory result (Components)	Original deadline	Actual deadline	Expected benchmarks (Activities)	Self-assessment Rate ¹⁶
C 3.5	Implementation of two training workshops	Month 11 (Feb. '10)	Month 13 (Apr. '10)	Two workshops delivered	HS
C 3.6	Implementation of training courses	Month 14 (Dec. '09)	Month 20 (Jun. '10)	Training courses delivered; pre and after evaluation of the managers and inspectors	HS
C 3.7	Development and supervision of Labour inspector training	Month 11 (Feb. '10)	Month 14 (Dec. '09)	Delivery of a training program for labour inspectors	HS
C 3.8	Five years Investment Plan itemizing equipment and transportation needs developed	Month 14 (Dec. '09)	---	Investment plan developed, suggestions and recommendations for future actions delivered	U
C 3.9	Study visits	Month 17 (Mar. '10)	Month 17 (Mar. '10)	Two study visits delivered (then amended to three via addendum)	HS

¹⁶ HS (Highly satisfactory), S (Satisfactory), U (Unsatisfactory)

Annex 2 – Overview of report delivered¹⁷

Component 1

Activity 1 – Analysis of the European, Italian and Egyptian primary and secondary legislation

Activity 2 – Proposal of adjustments of Egyptian primary and secondary legislation

Activity 3 – Assessment Report on Egyptian legislative system on OHS

Component 2

Activity 1 – Analysis of current System

Activity 2 – System management and institutional development at central level

Activity 3 – Organizational audit at central level

Activity 4 – Development of Information and Knowledge Management taking into consideration the Italian experience

Activity 5 – Development of the advisory role of the labour inspectorate

Activity 6 – Drafting of an Organizational Development Plan

Activity 7 – Analysis of the present working method of the Labour Inspectorate at local level

Activity 8 – Development of work flow, performance indicators, and measures points for labour inspectorate, enabling benchmarking on Governorate level

Activity 9 – Data collection at governorate level for actual assessment, using performance indicators

Activity 10 – Organizational modifications of modes of operation of the labour inspectorate and other actors and definition of desired situation

Activity 11 – Improvement of the work performance of Labour Inspectorate of the selected Governorate against well defined benchmarks

Activity 12 – Evaluation Report on Pilot Project Results

Component 3

Activity 1 – Strategy on Occupational Safety and Health

Activity 2 – Development of the external communication function of the OHS

Activity 4 – Training of trainers design for central and local inspectors

Activity 5 – Refer to the training material available on line

Activity 6 – Refer to the training material available on line

Activity 7 – Refer to the training material available on line

¹⁷ Copies of these documents are available both in the BC institutions and in the PAO

Annex 3 – Webpage set up <http://www.manpower.gov.eg/>

Introduction pages

Component 1 main page

Component 2 main page

Example of downloadable training material (component 3)