International Labour Organization

ILO brief

# Policy Brief

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# Assessment of the registration, licensing and inspection mechanisms of private employment agencies in Uganda

## 1. Executive summary

Between 2018 and 2022, Uganda facilitated the migration of approximately 227,457 workers to overseas labour markets, with the Middle East remaining the primary destination. Official government records also indicate that between 2016 and 2018, at least 31,859 Ugandans migrated to the Middle East for employment.

Labour migration plays a significant role in Uganda's economy, with remittances from migrant workers contributing nearly USD 1.65 billion annually. Administrative data from the Ministry of Gender, Labour and Social Development (MGLSD), including records generated through the External Employment Management Information System (EEMIS), suggest that women constitute the majority of Ugandan migrant workers, reflecting the dominance of domestic and care work in key destination corridors. However, stakeholders note that variations in reporting periods and coverage limit the availability of a single, consolidated deployment figure for recent years.

## 2. Migration context and trends

Labour migration from Uganda is driven by high youth unemployment, limited domestic job creation and strong demand for low- and semi-skilled labour in the countries of the Gulf Cooperation Council (GCC). Saudi Arabia is the dominant destination, accounting for over 250,000 deployments since 2016, followed by the United Arab Emirates and Qatar. Migrants are primarily employed in domestic work, cleaning, construction, security and hospitality.

Although Uganda has expanded its formal deployment system, irregular migration remains widespread. Many workers still rely on informal intermediaries or travel agencies masquerading as tourism operators, leaving them vulnerable to trafficking, debt bondage and exploitation abroad.

## 3. National legal and institutional framework

### 3.1 Core legislation

- Uganda's labour migration governance framework is anchored in:
- Employment Act, 2006
- Employment (Recruitment of Ugandan Migrant Workers) Regulations, 2021
- Prevention of Trafficking in Persons Act, 2009
- Immigration and Citizenship Control Act

The 2021 Regulations establish licensing criteria for private employment agencies (PrEAs), inspection powers, pre-departure training requirements, standard employment contracts and penalties for non-compliance. A four-party contract model enhances joint accountability between Ugandan and foreign recruiters.

### 3.2 Institutional actors

- **MGLSD**: Lead regulator of PrEAs through the External Employment Unit (EEU)
- **MOFA (Ministry of Foreign Affairs)**: Diplomatic engagement, consular protection and supervision of labour attachés

- **DCIC (Directorate of Citizenship and Immigration Control, Ministry of Internal Affairs)**: Exit clearance and border control
- **COPTIP (Coordination Office to Combat Trafficking in Persons)**: Anti-trafficking coordination
- **Social partners**: UAERA, NOTU, FUE, civil society organizations (CSOs), ELAU, Powerhouse

Despite clear mandates, coordination gaps persist, particularly in complaints handling, overseas monitoring and data sharing.

## 4. Regulation of private recruitment agencies

### 4.1 Licensing and inspection

Uganda has over 430 registered PrEAs, though fewer than 150 are operational, and fewer than 50 actively deploy workers. Licensing requires incorporation, security bonds of 100 million Ugandan shillings (UGX), background checks and pre-licensing inspections. Licences are issued for two years.

Inspection capacity is limited. Routine inspections are largely tied to licence renewal, with spot inspections conducted reactively. Only two officers are tasked with inspecting hundreds of agencies, resulting in weak enforcement.

### 4.2 Business environment

PrEAs operate under significant financial pressure due to security bonds, operational costs, delayed employer payments and cumulative regulatory fees (including the US$30 job order fee). Reduced employer commissions have incentivized cost shifting onto workers, contrary to fair recruitment principles.

Ugandan deployment costs remain higher than those of regional competitors, reducing competitiveness in the labour markets of the GCC countries.

## 5. Informal intermediaries and unethical recruitment

Informal intermediaries play a dominant role in recruitment, especially in rural areas. These actors charge undocumented fees, misrepresent job conditions and often collaborate covertly with licensed agencies. Travel and tourism agencies have increasingly been implicated in unethical recruitment, exploiting regulatory loopholes and weak inter-agency enforcement.

The absence of a national broker registration or disclosure system severely undermines accountability.

## 6. Pre-departure training and worker preparedness

Pre-departure training is legally mandated for 14 days, but implementation is inconsistent. Many training centres are owned by PrEAs, creating conflicts of interest. Due to cost constraints, training is often compressed into two to three days, with minimal coverage of rights, contracts or grievance mechanisms.

Oversight within MGLSD is fragmented, and inspections of training centres are irregular. The challenge is operational rather than legislative, requiring standardization, quality assurance and independent assessment.

## 7. Complaints handling and protection abroad

Historically, MGLSD handled complaints manually, leading to delays. In 2025, digital complaints mechanisms and a mobile app were launched, yet uptake remains limited due to low awareness, trust deficits and a lack of enforcement protocols.

Uganda has only one labour attaché in Saudi Arabia. Embassy capacity is overstretched, and monitoring in other high-risk destinations, such as the United Arab Emirates and Qatar, is minimal. Repatriation often depends on ad hoc funding and diplomatic intervention.

## 8. Bilateral labour agreements (BLAs)

Uganda has signed BLAs or memoranda of understanding (MoUs) with Saudi Arabia, Qatar, Jordan (non-operational) and the United Arab Emirates, with drafts underway for Oman and Kuwait. Stakeholder consultation was relatively inclusive for the Saudi BLA but inconsistent for the others. Finalized agreements are often not shared publicly, limiting oversight and accountability.

## 9. Key gaps and challenges

- Weak inspection and enforcement capacity
- High recruitment costs and debt bondage
- Dominance of informal intermediaries and illegal travel agencies
- Poor quality and oversight of pre-departure training
- Limited overseas protection and labour attaché coverage
- Fragmented complaints-handling systems
- Insufficient institutional coordination between MGLSD and MOFA

## 10. Priority recommendations

The recommendations directly address gaps identified through desk review, key informant interviews and stakeholder consultations, and are designed to be actionable within Uganda's existing institutional architecture.

### 10.1 Amend the regulatory framework to institutionalize digital compliance

Uganda has made significant investments in the External Employment Management Information System (EEMIS), yet its use remains largely administrative rather than legally enforceable. To address this gap, the Employment (Recruitment of Ugandan Migrant Workers) Regulations, 2021, should be amended to explicitly recognize EEMIS as the mandatory national platform for the governance of external employment.

The amended regulations should specify that all stages of the labour migration process, including recruitment, contract approval, deployment, complaints handling, repatriation and return, must be conducted and recorded through EEMIS. This should be accompanied by detailed, inter-ministerial standard operating procedures (SOPs) that define roles, timelines, data-sharing protocols and escalation pathways among MGLSD, MOFA, DCIC, the police, COPTIP and embassies.

Embedding EEMIS in law will reduce discretionary decision-making, enhance transparency, strengthen accountability and enable real-time oversight of both PrEAs and government actors.

### 10.2 Strengthen inspection, oversight and enforcement of private recruitment agencies

Despite a robust licensing framework, enforcement remains weak due to limited inspection capacity and inconsistent follow-up. MGLSD should expand the External Employment Unit (EEU) by recruiting and training additional compliance officers to achieve a realistic inspector-to-agency ratio.

A structured inspection regime should be introduced, comprising scheduled annual audits, risk-based unannounced inspections and targeted inspections triggered by complaints or data anomalies in EEMIS. Inspection findings, corrective actions and sanctions should be digitally logged in an EEMIS inspection module to create an auditable trail.

Sanctions should follow a graduated enforcement model, ranging from warnings and mandatory corrective action plans to financial penalties, licence suspension and revocations. Public disclosure of sanctions, where legally permissible, would enhance deterrence and public confidence.

### 10.3 Regulate informal intermediaries and address unethical recruitment pathways

Informal intermediaries remain among the most significant drivers of exploitation and trafficking risk. Uganda should introduce a mandatory registration and disclosure system for all recruitment intermediaries, including brokers operating under licensed PrEAs.

Unregistered brokerage should be explicitly criminalized, with clear penalties for both brokers and licensed agencies that collaborate with them. A public reporting and whistleblowing mechanism should be integrated into EEMIS, enabling workers, families and communities to report illegal recruiters anonymously.

Cases flagged through EEMIS should automatically trigger referrals to the police, DCIC and COPTIP for investigation. MGLSD, in collaboration with MOFA and the Uganda Police Force, should publish and regularly update a national blacklist of illegal recruiters and fraudulent travel operators.

### 10.4 Standardize and improve the quality assurance of pre-departure training

While pre-departure training is legally mandated, its quality and duration vary significantly. MGLSD should develop and gazette a standardized national pre-departure training curriculum aligned with destination-specific risks, sectoral needs and gender considerations.

To address conflicts of interest, accreditation of training centres should be separated from PrEA ownership, or, at a minimum, be subject to independent third-party assessment. Digital attendance tracking, biometric verification and training completion certificates should be integrated into EEMIS.

Regular inspections of training centres should be conducted, and non-compliant centres should face suspension or de-accreditation. Strengthening pre-departure training will improve workers' preparedness, reduce disputes abroad and enhance Uganda's credibility with destination countries.

## 10.5 Expand the labour attaché network and formalize MGLSD–MOFA coordination

Protection gaps in destination countries are closely linked to limited diplomatic labour capacity and weak inter-ministerial coordination. Uganda should expand its labour attaché network beyond Saudi Arabia to include priority destination countries, such as the United Arab Emirates and Qatar.

Labour attaché deployments should be formally requested by MGLSD based on migration trends and protection needs and administered through MOFA. To address long-standing coordination challenges, MGLSD and MOFA should jointly develop SOPs for referrals, case management, information-sharing and reporting.

Each relevant embassy should establish a dedicated labour migration desk to monitor contract compliance, liaising with PrEAs and employers, supporting dispute resolution and assisting distressed workers. Embassies should be granted structured access to the EEMIS complaints mechanism and mobile application, with all interventions logged to ensure accountability and system-wide learning.

## 10.6 Establish a comprehensive migrant worker protection and repatriation mechanism

Uganda's current responses to migrant distress and repatriation are largely ad hoc. A structured protection mechanism should be established, combining mandatory migrant worker insurance, clearer utilization of PrEA bank guarantees and a dedicated protection fund under MGLSD oversight.

Clear governance arrangements should set contribution levels, eligibility criteria, approval processes and accountability measures. This mechanism would ensure timely assistance for distressed workers abroad, reduce fiscal pressure on the government and limit reputational damage from delayed responses.

## 10.7 Strengthen pre-departure and exit screening through joint enforcement

Joint exit screening remains inconsistent despite its importance in preventing trafficking and irregular migration. Uganda should institutionalize joint screening protocols at Entebbe International Airport involving MGLSD, DCIC, the police and airport authorities.

All screening agencies should have real-time access to EEMIS to verify contracts, recruiters and deployment status. Risk-profiling tools should be introduced to flag high-risk travellers, including those using visit visas for labour migration.

## 10.8 Improve transparency and multi-stakeholder oversight of bilateral labour agreements

While Uganda has signed several BLAs and MoUs, the transparency of their negotiation and implementation remains limited. A standing BLA technical review committee should be established, comprising government, PrEAs, trade unions, CSOs and legal experts.

All BLAs should undergo stakeholder review prior to signature, and finalized agreements should be published. Greater emphasis should be placed on monitoring implementation, particularly grievance mechanisms, contract enforcement and employer accountability in destination countries.

## 10.9 Reduce recruitment costs and improve the business environment for PrEAs

High operational costs and declining commissions place significant pressure on PrEAs and, indirectly, on workers. The government should conduct a regulatory impact assessment of all migration-related fees, including job order charges, to inform rationalization or reduction.

Access to affordable financing for compliant PrEAs should be improved through partnerships with financial institutions. Stronger monitoring of recruitment fees and cost-sharing arrangements is essential to ensure alignment with national practice and fair recruitment principles.

### 10.10 Strengthen return, reintegration and data systems for returnees

Return and reintegration remain weakly institutionalized. Uganda should develop a comprehensive national return and reintegration framework that clarifies institutional roles at national and local levels.

Returnee data should be integrated into EEMIS to enable tracking, referrals and follow-up. Returnees should be linked to skills recognition, psychosocial support, livelihood programmes and social protection schemes to reduce vulnerability and prevent repeat irregular migration.

## 11. Annex: Action plan matrix

| Recommendation area | Key actions | Responsible entity | Timeline |
|---|---|---|---|
| Digital governance (EEMIS) | Amend regulations; develop SOPs; train users | MGLSD, MOFA, DCIC | 12–24 months |
| PrEA inspections | Recruit inspectors; digitize inspections; enforce sanctions | MGLSD, PrEAs | 12–36 months |
| Broker regulation | Register brokers; criminalize unregistered activity; public blacklist | MGLSD, PrEAs, police | 12–24 months |
| Pre-departure training | Standard curriculum; third-party certification | MGLSD, PrEAs | 6–18 months |
| Labour attachés & embassies | Deploy attachés; establish labour desks; log cases in EEMIS | MGLSD, MOFA | 12–36 months |
| Worker protection | Establish protection fund; mandate insurance | MGLSD, PrEAs | 18–36 months |
| Exit screening | Joint protocols; EEMIS verification | MGLSD, DCIC | 6–12 months |
| BLAs | Stakeholder review; publish agreements | MOFA, MGLSD, PrEAs, CSOs | Ongoing |
| Recruitment costs | Fee review; financing access | MGLSD | 12–24 months |
| Return & reintegration | National framework; EEMIS integration | MGLSD | 12–36 months |

## 12. Conclusion

The proposed reforms provide a coherent, phased and institutionally grounded roadmap to strengthen Uganda's labour migration governance system.

By embedding digital oversight, clarifying institutional roles, expanding protection mechanisms abroad and aligning national practice with ILO fair recruitment standards, Uganda can significantly reduce migrant workers' vulnerability while sustaining the economic benefits of labour migration.


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