

**BASELINE REPORT FOR THE BOLSTERING ETHICAL RECRUITMENT POLICIES
AND PRACTICE TO ENHANCE SAFE AND ORDERLY LABOUR MIGRATION
PATHWAYS, PREVENT EXPLOITATION AND BETTER PROTECT MIGRANT
WORKERS FROM UGANDA**

CFA/UG/012/2020

Labour Migration and Human Development (LMHD) Unit

Submitted by:

By

Caroline Abalo Okello

MME, PgDME, MPRH, BPS

Email: Okellocaroline18@gmail.com

Skype: carolineabalo

Mobile: +256 779 025 241 / +256 754 883 438



1



Contents

ACRONOYMS5

Acknowledgements6

KEY TERMS USED:7

EXECUTIVE SUMMARY8

INTRODUCTION..... 11

APPROACH AND METHODOLOGY..... 12

Key principles of the approach and methodology 12

Our specific approach to the assessment...... 12

COVID 19 Risk mitigation plan 19

Ethical Consideration..... 20

FINDINGS AND DISCUSSIONS..... 21

BACKGROUND CHARACTERISTICS OF THE PRIVATE RECRUITMENT AGENCIES 22

COVID-19 PANDEMIC AND THE OPERATIONS OF PRAS..... 29

CHALLENGES FACED AT THE DIFFERENT LEVELS OF THE RECRUITMENT CHAIN 31

INTERNATIONAL RECRUITMENT INTEGRITY SYSTEM (IRIS) STANDARD 34

QUANTITATIVE INTERVIEW QUESTIONNAIRE WITH PRIVATE RECRUITMENT AGENCIES: 50

KEY INFORMANT INTERVIEWS WITH PRE DEPARTURE ORIENTATION TRAINING INSTITUTIONS:.. 61

KEY INFORMANT INTERVIEWS WITH MGLSD AND DISTRICT LABOUR OFFICERS..... 63

KEY INFORMANT INTERVIEWS MINISTRY OF INTERNAL AFFAIRS..... 65

KEY INFORMANT INTERVIEWS WITH UAERA STAFF..... 67

KEY INFORMANT INTERVIEWS WITH IOM STAFF 69



List of Figures

Figure 1: Overview of the Approach and Methodology of Execution of the Baseline study 13

Figure 2: Quality assurance process 18

Figure 3: COVID 19 risk and Mitigation Plan 19

FIGURE 4: HIGHEST EDUCATIONAL LEVEL OF RESPONDENT 22

FIGURE 5: YEAR OF ESTABLISHMENT OF THE PRIVATE RECRUITMENT AGENCIES 22

FIGURE 6: STAFFING SEX RATIO WITHIN THE PRA SECTOR 24

FIGURE 7: REGIONS WHERE PRAS EXTERNALIZED LABOUR FROM UGANDA 25

FIGURE 8: REGIONS WHERE PRAS HAVE BUSINESS PARTNERS AGENCIES 26

FIGURE 9: FREQUENCY OF REVIEW OF AGREEMENTS WITH BUSINESS PARTNERS 26

FIGURE 10: OPPORTUNITY VERIFICATION CHECKS CONDUCTED IN COUNTRIES OF LABOUR EXPARTRATION 27

FIGURE 11: CATEGORIES OF WORKERS DEPLOYED OUT OF UGANDA 27

FIGURE 13: COST FOR WORKERS/ JOB SEEKERS TO COVER 28

FIGURE 15: FREQUENCY OF ENGAGEMENT OF PRAS WITH THE MINISTRY OF GENDER LABOUR AND SOCIAL DEVELOPMENT 29

FIGURE 16: MITIGATION PLAN TO EFFECTS OF COVID BY PRAS GIVEN THE UNCERTAINTY OF THE PANDEMIC 30

FIGURE 17: CLASSIFICATION OF PRAS 30

Figure 18: Recruitment Channels 31

Figure 19: CHALLENGES PRAS FACE WITH EMPLOYERS 32

FIGURE 20: HEARD OF IRIS 35

FIGURE 21: SOURCE INFORMATION ON IRIS 37

FIGURE 22: PERCEIVED ADVANTAGES OF IRIS CERTIFICATION 38



List of Tables

Table 1: Sampled districts for Qualitative assessment 15

TABLE 2: OUTCOME INDICATOR TRACKING TABLE 21

Table 3: The recruitment licensing requirement..... 23

TABLE 4: YEAR PRA INTERVIEWED WAS ESTABLISHED VS WHEN PRA ATTAINED A LICENSE 23

TABLE 5: WHAT EFFECTS DID THE COVID-19 PANDEMIC HAVE ON YOUR BUSINESS?... 29

TABLE 6: CHALLENGES FACED BY PRAs DEALING WITH JOB SEEKERS 32

TABLE 7: WHAT CHALLENGES DO MIGRANT WORKERS FACE IN THEIR PLACES OF EMPLOYMENT 33

TABLE 8: WHAT CHALLENGES DO EMPLOYERS FACE WITH THE MIGRANT WORKERS? 33

Table 9: CHALLENGES FACED BY PRAS IN THE TRADE 34

Table 10: PERCEIVED POSSIBILITY OF ADHERING TO THE ELEMENTS IN THE IRIS PRINCIPLES..... 39

Table 11: PERCEPTION OF PRAS ON THE RESPECT FOR LAWS AND FUNDAMENTAL PRINCIPLES AT WORK..... 40

Table 12: PERCEPTIONS OF PRAS ON THE PRINCIPLE RESPECT FOR ETHICAL AND PROFESSIONAL CONDUCT 41

Table 13: PERCEPTION OF PRAS ON PROHIBITION OF RECRUITMENT FEES AND RELATED COSTS TO JOBSEEKERS PRINCIPLE 42

Table 14 : PERCEPTION OF PRAS ON PRINCIPLE OF RESPECT FOR FREEDOM OF MOVEMENT 43

Table 15: PERCEPTION OF PRAS ON RESPECT FOR TRANSPARENCY OF TERMS AND CONDITIONS OF EMPLOYMENT PRINCIPLE 44

Table 16: RESPECT FOR CONFIDENTIALITY AND DATA PROTECTION 45

Table 17: RESPECT FOR ACCESS TO REMEDY 45

Table 18: ADVANTAGES OF USING GRIEVANCE MANAGEMENT SYSTEMS 46

Table 19: WHAT WOULD MAKE IT EASY TO USE GRIEVANCE MANAGEMENT SYSTEMS . 46



ACRONOYMS

DLO	District Labour Officer
EEMIS	External Employment Management Information System
GoU	Government of Uganda
IRIS	International Recruitment Integrity System
IOM	International Organization for Migration
ILO	International Labour Organization
PRA	Private Recruitment Agency
TOC	Theory of Change
M and E	Monitoring and Evaluation
MGLSD	Ministry of Gender Labour and Social Development
RA	Research Assistant
KII	Key Informant Interview
TiP	Trafficking in Persons
UAERA	Uganda Association of External Recruitment Agencies
UBOS	Uganda Bureau of Statistics



Acknowledgements

The Baseline Consultant Abalo Caroline Okello would like to extend gratitude to the different officials and respondents that contributed to the baseline exercise for the project. Special thanks go to the International Organization for Migration (IOM) team particularly Madam Odette Bolly, Mr. Okori John Peter and Mrs. Carolyne Kantu who supported the baseline evaluation exercise in various capacities. Special thanks to the data collectors under the supervision of Mrs. Nakazibwe Sarah Katusabe who went out of their way to gather data from the respective private recruitment agencies (PRAs) amidst the travel restrictions as Uganda dealt with the second wave of the COVID-19 lockdown.

Finally, special gratitude goes to the Ministry of Gender Labour and Social Development (MoGLSD), the Uganda Association of External Recruitment Agencies (UAERA) and all stakeholders that participated in the baseline processes as either key informants or mobilizers.



KEY TERMS USED:

Domestic Workers: In the context of this study domestic workers refer to labour that operates within the confines of a family.

IRIS Standard: Ethical recruitment means hiring workers lawfully and in a fair and transparent manner that respects and protects their rights. The IRIS Standard is a set of global principles that define ethical recruitment. It is based on international labour and human rights instruments and was developed through extensive multi-stakeholder consultation. The IRIS Standard articulates what ethical recruitment means in practice and how labour recruiters can demonstrate compliance.

Respect for Laws, Fundamental Principles and Rights at Work: The labour recruiters must comply with all applicable legislation, regulations, multilateral and bilateral agreements on labour migration, and policies related to the recruitment of migrant workers in the jurisdictions of origin, transit and destination countries, including those pertaining to the immigration or emigration of migrant workers. This principle explicitly prohibits the use of trafficking in persons, forced labour, and child labour, and includes respect for the right of freedom of association and collective bargaining and respect for equality of treatment and non-discrimination, as recognized in the ILO Declaration on Fundamental Principles and Rights at Work.

Respect for Ethical and Professional Conduct: In order to meet the responsibility to respect laws and comply with the IRIS Principles, the labour recruiters will have in place management systems, including due diligence, to ensure that their recruitment activities are consistent with the IRIS Principles and conducted in a manner that treats migrant workers with dignity and respect, free from harassment, or any form of coercion or degrading or inhuman treatment.

Prohibition of Recruitment Fees to Jobseekers: The labour recruiters must not charge directly or indirectly, in whole or in part, any fees or related costs to migrant workers, for the services related to recruitment for temporary or permanent job placement or employment.

Respect for Freedom of Movement: The labour recruiters must not require migrant workers or their family members to provide a monetary deposit or other collateral as a condition of employment, and must not withhold, destroy or confiscate documents, wages, or other personal belongings, or otherwise limit freedom of movement.

Respect for Transparency of Terms and Conditions of Employment: The labour recruiters must ensure that, prior to deployment, migrant workers are provided with written contracts in a language each worker understands, detailing the terms and conditions of employment including but not limited to the nature of work undertaken, rates of pay and pay arrangements, working hours, vacation and other leave, and all other lawful deductions from pay and benefits of employment in accordance with national law. The labour recruiters must ensure that the worker's written consent is obtained without coercion.

Respect for Confidentiality and Data Protection: The labour recruiters must not record, in files or registers, personal data which is not required for judging the aptitude of migrant workers for jobs for which they are being or could be considered, or required to facilitate their deployment. The labour recruiters must ensure that all personal data that they collect, receive, use, transfer or store shall be treated as strictly confidential and shall not be communicated to any third party without the prior written informed consent of the worker or workers' representative, unless required by law.

Respect for Access to Remedy: The labour recruiters must ensure that migrant workers have effective access to remedy, without fear of recrimination, reprisal, or dismissal, such as internal grievance procedures



of the labour recruiter and/or the employer and to those remedies provided by law in the country of origin and destination, in relation to their recruitment activities.

EXECUTIVE SUMMARY

The International Organization for Migration (IOM) is committed to ensuring orderly and humane governance of migration, promoting international cooperation on migration issues, and assisting in the search for practical solutions to migration issues. According to research from the Uganda Bureau of Statistics (UBOS) and International Labour Organization (ILO), young Ugandan women (aged between 15-29 years) face a number of hurdles in the labor market, from higher unemployment rates to lower wages. As a result, many young women trying to escape unemployment and poverty at home often end up as domestic workers in the Middle East where over the years, there has been systematic documentation of cases of exploitation, physical and/or sexual abuse, and even fatalities. The Performance Report on Countering Trafficking in Persons in Uganda for 2018 reported 650 cases of transnational trafficking victims including 287 female adults and 33 female children.

Ethical Recruitment is IOM's flagship initiative to promote ethical recruitment of migrant workers. It has been created by IOM and a coalition of partners from government, civil society and the private sector. International Recruitment Integrity System (IRIS) is a global multi-stakeholder initiative that supports governments, civil society, the private sector and recruiters to establish ethical recruitment as a norm in cross-border labour migration.

The goal of IRIS is to make international recruitment fair for everyone involved: migrant workers, employers, recruiters and countries of origin and destination.

To this end, the study adopted a census approach purposed to interview all registered Private Recruitment Agencies (PRAs) in Uganda, involving a mixed methods data collection approach of quantitative and qualitative data collection that utilized structured questionnaires, key informant guides and literature review. A total of 149 (57 project targeted and 92 none project targeted) of the total 213 registered PRA responded to the survey. The intention was to interview 213 PRAs that are currently operational in Uganda. The data was analyzed using SPSS 20.0 to produce both frequencies and correlations between different study parameters. A thematic analysis was equally applied for the key informant interviews and focus group discussion notes.

The results indicate the majority of the PRAs have business partners in the destination countries (96%), 97% have monitoring frameworks for migrant workers and 94% participate in UAERA annual meetings. Ninety-seven percent (97%) of job opportunities are verified prior to availing them onto the market for potential workers to express interests. The vast majority of Ugandan PRAs recruit workers in the fields of domestic worker (100%), security personnel (96%) and hotel staff (90%). A significant fraction of the respondents understands the costs/fees that are required of the worker that include referral and placement services including advertising, disseminating information, arranging interviews, submitting documents for government clearances, confirming credentials, organizing travel and placement into employment.

The highest level of confidence is in the Principle of respect for laws and fundamental principles at work conduct performing at 96% for trained PRAs and 98% for none trained PRAs. The least performance is registered on the principle for freedom of movement at 34.7% and 44.5% for none project and project targeted PRAs respectively followed by the principle of respect for transparency of terms and conditions for employment performing at 48% for trained PRAs and 40% for none trained PRAs. There is no difference between none project and project targeted PRAs irrespective of the trainings however a difference is knowledge is realized from the qualitative discussions implicit of mindset change. With continuous engagement and popularization of IRIS and the need to adhere to the principles there is will be a high potential for improving the operations of labour externalization in Uganda



The majority (97%) of the PRAs are not sure of the perceived advantages of being IRIS certified of which 35% are the Project Targeted PRAs. The majority of the PRAs engage with the MGLSD based on a need based (90%) and or on request by UAERA (83%). The overall perceived possibility to PRAs capability to adhere to the principle of respect for laws and fundamentals principle at work is at 96% and 99% for project targeted and none project targeted PRAs. Study respondents were asked for their perceptions on the possibility of Uganda as a country ability to adhere to all the elements in the seven IRIS principles. 91% for the project targeted PRAs and 97% of the none project targeted PRAs perceive that they can ably align to the principle of prohibition of recruitment fees and related costs to jobseekers. Only 44% of the PRAs interviewed perceive they can adhere to the principle of respect for transparency of terms and conditions of employment. There is adherence to the IRIS principle of Respect for confidentiality and data protection (93%). Ninety percent of the PRAs interviewed perceive that they could be able to always adhere to the principle of respect for access to remedy.

Following the finding of the survey, the study came up with the following recommendations;

- ❖ The need to advocate for the development of standard employment contracts that contain provisions for safe return and migration strategies.
- ❖ The Government of Uganda should clamp down on agencies and companies with fraudulent hiring practices. Part of this could involve thorough review of contracts to ensure that migrant workers are protected. This could be through intentional planned support supervision and quality assurance of the work that the PRAs undertake.
- ❖ The need to develop policies that aim to protect migrant workers from abusive hiring practices. For example, recruitment fees and related costs should not be shouldered by workers. There should also be a program in place that would help relieve Ugandan migrant workers of debts incurred during recruitment and migration
- ❖ There is need to popularize the benefits of IRIS certification across the PRAs, Government (including political leaders), development Organizations and all stakeholders operating in this sector. This will provide a deeper understanding of IRIS and as such provide ground for uptake across all these critical stakeholders.
- ❖ It is important to ensure integrity in international recruitment systems by defining a clear role for PRA and the MoGLSD to match jobs with skills and to address the mutual needs between employers and workers as well as between origin and destination countries to be more strategic. Strengthening community structures and systems to monitor, report and respond to any recruitment processes that are not sanctioned by the MoGLSD and the district local authority
- ❖ There is need to make the External Employment Market Information System (EEMIS) to be accessible by the district local Government. This is to enable the MoGLSD and district local government to monitor and track both formal and informal recruitment systems to protect potential and returning migrants from any abuse and/or trafficking.
- ❖ A quality assurance mandate to standardize pre-departure training needs to be defined to be able to address the flaws within the training delivery
- ❖ There is need to have training materials translated into several local languages, that the potential migrant workers can relate with. Such translation will help the migrant workers to better understand the content of the training
- ❖ The MoGLSD should explore the possibility of signing bilateral labour agreements with countries receiving the Uganda migrant workers.
- ❖ There is need to strengthen the retention of workers within the country by strengthening the labor industry in Uganda



- ❖ There is need for the MoGLSD and stakeholders to set up a structured engagement system with the PRAs for appropriate reporting and holding PRAs accountable of their activities. This may involve working through the PRAs umbrella body UAERA and/or even making spot check monitoring on the activities of the PRAs. The current practice does not convene a unified engagement with all PRAs with government and associated stakeholders as such living room for compliance gaps in the operation. The set-up of this platform can also be used to address emerging issues within the industry, appreciating the complexity that the product traded in this sector are human beings.
- ❖ There is need to review the safety precautions in a single individual owning more than one PRA.
- ❖ There is need to increase the appetite for training institutes to be set up for this industry.
- ❖ MoGLSD should closely involve the district labour officers (DLOs) on the operations of the PRAs as a district level quality assurance check where the potential migrant workers come from. This could potentially address the challenges attributable to falsification of documents by potential migrant workers. The DLOs could potentially play a great supervision role at district level and be used to leverage contact and feedback with migrant worker's family.
- ❖ The project could engage in routine in routine conversations with PRAs to address the perceived mistrust in the advantages of IRIS certification. This is premised on the fact that quit a number of the PRAs are interested in getting IRIS certified however not so confident of the advantages this could provide. Continuous education/sensitization on the benefits of certification could address these concerns.
- ❖ Need for the project to support continuous engagement and popularization of IRIS certification to both MoGLSD, UAERA and PRAs that will give a high potential for improving the operations of labour externalization in Uganda

Operations related challenges that cut across PRAs that could affect the ethical recruitment policies and practices are as herein below;

- ❖ Insufficient training time allocated to the potential migrant workers versus the large training curriculum as such compromises quality of training provided.
- ❖ Lack of translated training materials despite the fact that potential migrant workers arrive from the different parts of Uganda with the largest number profiling with a limited command of the English language. The trainings are delivered in English and where translation is to be done can only be provided in Luganda¹ which is the proxy and language for the trainers.
- ❖ The pre-departure training conducted in only one week has compromised the quality of the training provided as different intakes will require the same space yet with competitive departure schedules.
- ❖ Lack of budget for the MoGLSD to provide efficient supervision of PRAs as required.
- ❖ Limited support provided to PRAs when dealing with challenges such as confiscation of travel documents of potential migrant workers by Interpol.
- ❖ Existence of one operational bilateral labour agreement with only one country (Kingdom of Saudi Arabia) that compromises the safety of the workers that are sent out.
- ❖ The inconsistencies in the leadership structure within the PRAs. The ownership of multiple agencies by single individuals.
- ❖ Lack of/inconsistent deliberate structured engagements between the MoGLSD and PRAs.
- ❖ The limited understanding of the role of the District Labour Officers (DLO) on the operations of PRAs in Uganda

¹ Luganda is the most spoken language in the central part of Uganda



INTRODUCTION

Project Background

The International Organization for Migration (IOM) is committed to ensuring orderly and humane governance of migration, promoting international cooperation on migration issues, and assisting in the search for practical solutions to migration issues. According to research from the Uganda Bureau of Statistics (UBOS) and International Labour Organization (ILO), young Ugandan women (aged between 15-29 years) face a number of hurdles in the labor market, from higher unemployment rates to lower wages. As a result, many young women trying to escape unemployment and poverty at home often end up as domestic workers in the Middle East where over the years, there has been systematic documentation of cases of exploitation, physical and/or sexual abuse, and even fatalities. The Performance Report on Countering Trafficking in Persons in Uganda for 2018 reported 650 cases of transnational trafficking victims including 287 female adults and 33 female children. According to the report, irregular and unguided labor migration was the most contributing factor for trafficking of Ugandans to foreign countries and some foreign nationals to or through Uganda. Majority of the victims were recruited in the trafficking trap through deceptive and fraudulent-forged travel documents. Indeed, most of these cases were related to illegal labor recruitment and attempt to trafficking, but some vulnerable and desperate migrant workers often refer to traffickers as they deploy faster than the formal channels. Unfortunately, informal channels often lead to labor exploitation and violation of migrant workers' rights in countries of destination. The GoU has nevertheless made significant efforts towards strengthening labour migration into the country with the establishment of the Labour Externalization Program. In 2014, IOM supported the MGLSD to develop the External Employment Management Information System (EEMIS). The EEMIS is a GoU system designed to enhance critical administrative processes for various government ministries, private recruitment companies and migrant workers. On the recruitment side, the business has recently registered an exponential growth in Uganda. For example, UAERA has seen its members increase from 86 in 2018 to 186 in February 2020. IOM in collaboration with MGLSD and UAERA, has recently launched a project entitled "Bolstering ethical recruitment policies and practice to enhance safe and orderly labor migration pathways, prevent exploitation and better protect migrant workers from Uganda" It is expected, that through the project actions, the migrant workers will benefit from the expansion of ethical recruitment channels, and in doing so contribute to curb the spread of numerous forms of TiP related to labour migration.

Project Objectives:

- 1) Strengthening commitments and actions of private recruitment agencies to create consensus, cooperation, and an enabling environment for ethical recruitment across the industry.
- 2) Improving policy, regulatory and enforcement frameworks at national and local levels to enhance migrant protection and promote ethical recruitment

Purpose and Significance of Study

The purpose of the baseline research was to conduct a participatory survey on current knowledge, attitudes and practices of ethical recruitment among the PRAs, Government Sector and line Ministry department and the target District Local Government counterparts to reduce prevalence of modern slavery among Ugandan labor migrants. The baseline measurement will help to provide a synopsis of the intervention area and benchmark values/statistics for the project indicators to aid implementation and evaluation for learning and future programming.

Baseline study objectives:

The baseline survey was guided by the following key objectives which informed the key assessment questions during the survey.



- 1) To establish opportunities that support ethical recruitment processes especially for women and youth through linkages and enabling environment
- 2) To benchmark outcome and output level indicators against which progress on set targets and milestones will be assessed.
- 3) To find out the opportunities for strengthening and sustaining the enabling environment for PRA and the Uganda Government on Ethical recruitments to be conducted within the Uganda policy framework and international Labour law.

APPROACH AND METHODOLOGY

This assessment was largely participatory, employing both qualitative and quantitative approaches to establish the existence, benefits, challenges and lessons learnt from labour externalization trade.

Key principles of the approach and methodology

The methodology has the following key principles that it took into consideration:

- i. **Utility:** The consultant ensured that users of the report receive a useful, valued report with practical recommendations based on the actual findings, challenges, opportunities and lessons learnt from the PRAs operations. Ensuring that the report is valuable for each of the targeted audiences.
- ii. **Accuracy:** The assessment team ensured that the results are dependable, truthful, and able to support programme improvements and adjustments to meet the long-term goals.
- iii. **Integrity/honesty:** The team was thoroughly trained, briefed about ensuring honesty and integrity during the entire assessment process to be able to give findings as they are obtained, without any alterations that hinder partiality.
- iv. **Respect for ethics:** The consultant is conversant with the ethical codes of conduct for undertaking these assessments and ensured her team adhered to the ethical codes for our partners. The team also ensured respect for legal, ethical, and cultural rubrics in all the communities where data was collected.
- v. **Completeness and fair assessment:** Our team aimed at ensuring that both the strengths and weaknesses realized from the operations of PRAs and the associated stakeholders were captured and accurately reported. The team ensured that they do not "tilt" the results to satisfy the client or stakeholders but be objective enough to facilitate programmatic improvements.
- vi. **Respect of Persons:** The research ensured respect of persons by giving weight to their opinions and choices while refraining from obstructing their actions. The researchers were trained in research protocols that are in line with respect to persons.
- vii. **Gender Equality and Social Inclusion;** The study approaches ensured equality and social inclusion of all eligible persons and therefore be inclusively represented.

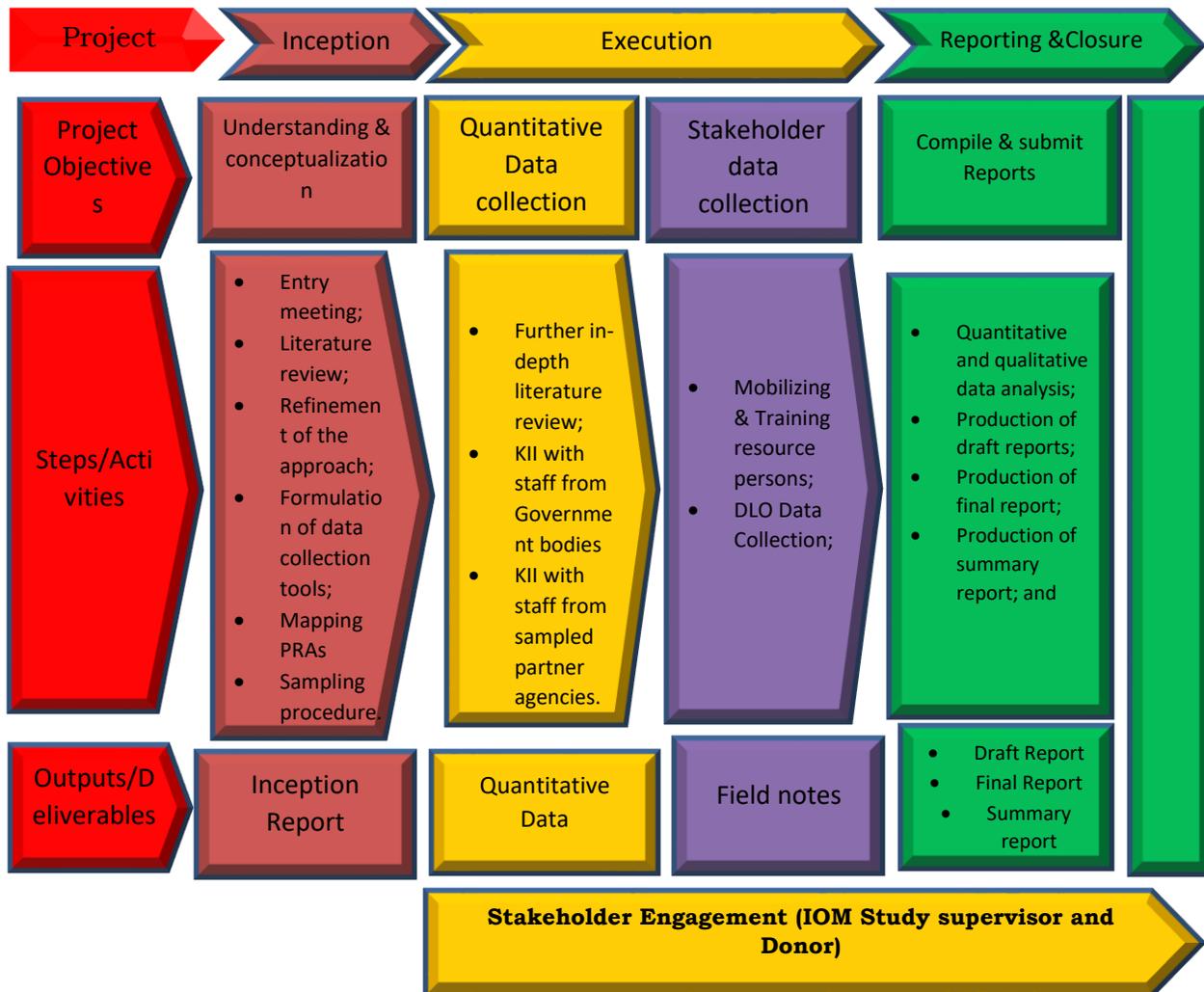
Our specific approach to the assessment.

This section describes the overall approach and techniques in executing this assignment including, study design, qualitative and quantitative data collection methods and tools, study population, sample size and design as well as data management and analysis approaches adopted. The baseline survey was implemented in a three-phased approach² ; study design, scope, data collection methods, sources of data, sample sizes and sampling procedures, data analysis processes, quality assurance, and ethical considerations.

² three-phased approach to executing the baseline study in Figure 1 below



Figure 1: Overview of the Approach and Methodology of Execution of the Baseline study



I. Phase One: Inception phase, during this phase, the consultant executed the following tasks:

Document Review

Both project and non-project documents were reviewed. The review aimed at enhancing the consultant’s understanding of the project and the context within which it is situated. The review also generated some additional information which has supported the comparison of findings of the survey. The document review was majorly shaped by issues implied in project goal and outcome indicators. Specifically reviewing the; Project design documents and a compendium of supportive documents (Logical Framework, M&E Plan, Theory of Change (TOC) and learning agenda), the MGLSD annual reports.

The review of the project’s living documents like the TOC was purposed to enrich the projects’ learning agenda with critical study questions that would enrich the road to sustain the project’s implementation approaches that can be incorporated for advocacy and replication by the government of Uganda. This will enhance the project



gains and popularize it within the budget discussions for parliament and inform the policy space on holding the government responsible for the PRAs code of conduct and expected standard operating procedures.

The review process did not change any project expected results and quality standards however it identified possible opportunities for replication for future designs by teasing a space for embedding sustainability discussions right from the inception stages of the project. The baseline review process supported in the designing of monitoring tools and or after-action review tools that will also be a core within the learning agenda.

Arising from the documentary review, the consultant with support of IOM supervisor also mapped out the respective agencies and government entities involved in the implementation of labour externalization activities.

Elaboration of the methodology

Based on findings from the literature review and the above assessment, the consultant has **elaborated the methodology and approach** for undertaking the assignment. The methodology specifies the data needs, the target information sources as well as the different methods that will be used to collect, analyze and report the findings.

Development of Data collection tools

Arising from documentary review, the consultant developed data collection tools. These tools were used to ensure that accurate and comprehensive information is collected regarding all aspects of the study. The tools were discussed and approved by the client before they were adopted. The following tools have been developed and attached to this inception report.

- ✓ Quantitative survey tool for PRAs
- ✓ Key informant interview guides.

Study Design

The baseline was a longitudinal true treatment study interacting with the same project beneficiaries (PRAs) over its lifetime. It employed a judicious mix of qualitative and quantitative methods. A difference in differences analysis was considered upon completion of the second point of data collection to ascertain the impact the project will have had within the sector.

The baseline survey leveraged the panel survey design for Private Recruitment Firms specifically targeting all the 213 registered PRAs in Uganda. The primary purpose was to generate quantitative programmatic information that will improve the project design and theory of change, build consensus with critical stakeholders, and developing of local capacity to gather information, analyze this information and use it for decision making and promote local participation in identifying priorities of the PRAs and monitoring PRAs and performance of the different training institutions and Labor to different countries. The quantitative survey was meant to ascertain the practice and coverage of utilization of the laws by the PRAs in management of migrant worker. This was to align to the quantitative components of the study.

Study Population

The consultant adopted a treatment- control study design to ascertain a differences in differences analysis within groups (comparable at the second point analysis) for effective comparison of the project implementation results in the event of an endline assessment. A total of 149 of 213 registered PRAs in Uganda were assessed during the baseline to provide viable panel data for comparison at the next data collection phase to assess the differences



between the programme target and the non-targeted PRAs. The non-programmed PRAs were considered as a control sample. This group will be recommended for future comparative studies to be able to effectively measure the project gains through the difference in differences analysis. This will inform the replication initiatives of the project as means to measure the sustainability and retention elements of the project’s initiatives through the implementation. The study conducted key informant interviews with line ministries, samples of district labour officers, Training institutions for PRAs and CSOs.

Sample size and Design

The sample size refers to the number of individuals that were considered from the population of individuals presented in the prior section. On the other hand, the sampling design denotes the procedure adopted in ensuring that the selected sample size is representative of the population. A total of 149 PRAs (57 project targeted and 92 none project targeted) were interviewed at baseline.

Sampled districts for Qualitative assessment

A list of target districts was purposively sampled on the basis of districts that send out the most labour to the respective countries of destination based on the MGLSD statistics. The pattern showed Eastern and Central parts of Uganda providing the highest statistics and hence the larger representation from these locations. A total of 10 district labour officers were interviewed enlisted below to provide an understanding of their role in supporting the labour externalization process.

Table 1: Sampled districts for Qualitative assessment

A	Central Region
1	Kampala
2	Mukono
3	Wakiso
B	Eastern Region
4	Mbale
5	Manafa)
6	Tororo
7	Sironko
C	Northern Region
8	Gulu
9	Lira
D	Western Region
10	Mbarara

2. Phase two: Data collection Phase. During this phase the consultant undertook the detailed assessment

Consideration of COVID 19 Standard Operating Procedures

On 18th June 2021, the Government of Uganda (GoU) introduced a lock-down that restricted movements and limits staff in offices to only 10%. These developments greatly impact the data collection process. The consultant adjusted to the following approach that was approved by the supervisor of the baseline study:

- a) Prioritize use of virtual data collection techniques supplemented by phone interviews of the Key informants.
- b) Proposed the use of self-administered online/web based quantitative interviews by the PRAs however this registered a low response rate attributable to technical issues on the use of the online survey platform by the



study respondents. Majority of the targeted PRAs do not have the requisite skills to self-administer using the Monkey survey online tool. For Example, after one-month period given to PRAs to submit their questionnaires, less than 10 responses were successfully submitted. Such situation had forced the consultancy team to change their strategies. Indeed, the option to conduct physical interview was selected in consultation with UAERA and the LMHD Programme manager.

- c) Upon lifting of the lockdown, the consultant then reconvened the research team to undertake physical interviews with the PRAs.

The process involved the following steps:

- a) **National level Stakeholder data collection:** Data collection at the National level was then followed by the on-line data collection methodologies. The process involved the following:
- ✓ Obtaining focal point persons from the selected agencies was sought;
 - ✓ Contacted these focal point persons and agreed on the interview program including the method;
 - ✓ Shared the interview checklist with the focal point person beforehand through the Project Assistant at IOM; and
 - ✓ Undertook the interview using the agreed method, for example, it was either a phone interview or virtual interview.

Key Informants respondents for the baseline study

- Platform for Labour Action
- Rahab Uganda
- Migrant Workers Voice Organization
- National Youth Council
- Pre Departure Orientation Training Institutions - Gulf Skills Development Centre, IKHLAAS Training Centre and Centre for Economic Social Cultural Rights in Africa(CESCRA)
- UAERA
- Ministry of Gender, Labour and Social Development
- Ministry of Internal Affairs
- Ministry of Foreign Affairs
- Platform for Labour Action
- PRAs that have been trained
- PRAS that have not yet been trained.
- District Labour Officers

Mobilizing and training the Research/ Data collection procedure Assistants. The consultant mobilized and trained ten (10) Research assistants.

Data collectors were trained on ethical standards for conducting research during emergency, interviewing skills, conducting phone interviews and the baseline tools. The training was attended by colleagues from IOM for technical guidance. Pairwise practice was conducted to acquaint the time on the interview requirements.

The data collection followed these steps:

- Introduction of the consultant to the governing authorities in the line ministries of Ministry of Foreign affairs, Ministry of Gender labor and Social Development,
- Introduction to UAERA which is a governing body for Private Recruitment Agencies.
- The Research Assistants were introduced to the PRAs through introductory letters from IOM.



- An email was sent to all the stakeholders who were to participate in the Key Informant Interviews, introducing the baseline survey and the lead consultant.
- Interviews were conducted by the RAs on the scheduled dates of the data collection.

Two Research Assistants and the quality assurance expert were engaged to hold Key Informant interviews.

Consultations with MGLSD and UAERA: To obtain information from the DLOs, the consultant through IOM sought the support of MGLSD who provided contacts of all the DLOs and commitment through introduction email for the exercise. UAERA did provide the introduction to the PRAs to provide ground for smooth running of the interviews.

Data Collection Methods and Tools

The mixed approach adopted in the baseline survey involved collection of both quantitative and qualitative data. The data collection methods and tools are described in the following sections of the baseline report.

Quantitative data collection method

Structured or coded questionnaires were administered to the PRAs. Questionnaires were developed by consultants and reviewed by teams at IOM and Quality assurance team before pre-testing them in the study sites. At the onset the questionnaires were given to research assistants to collect data. The structured questionnaires assessed the PRAs adherence to the IRIS principles including:

- Respect for laws and fundamental principles at work (**General principle A**),
- Respect for ethical and professional conduct (**General principle B**),
- Prohibition of recruitment fees and related costs to jobseekers (**Principle 1**),
- Respect for freedom of movement (**Principle 2**),
- Respect for transparency of terms and conditions of employment (**Principle 3**),
- Respect for confidentiality and data protection (**Principle 4**),
- Access to remedy (**Principle 5**).

Qualitative Data collection method

This included use of Key Informant Interviews (KIIs). The unstructured key informant interview guides were developed for different stakeholders including Ministry of Foreign Affairs (MOFA), Ministry of Gender, Labour and Social Development (MoGLSD), Labor Officers and training institutes.

Data Quality Control

Data was uploaded to the server on a daily basis by the consultant and the field supervisor. Data was checked for error relating to illogical and inconsistent entries. Any flagged query was shared with the responsible interviewer/research assistant for action (that included consulting with the interviewer, retraining, and possibly re-contacting the respondent). In addition, the data capture forms were designed with inbuilt skips and validation keys to reduce on inconsistent entries and also to enforce that all questions are answered. Data was uploaded to the cloud computer server procured by the study team/ consulting team and/or IOM IT team. All interviewers were trained on how to capture data, and a pre-test was done using the demo for survey monkey. The database for the questionnaire captured an individual respondent's unique identifier (ID).

Some re-interviews were redone for a sub-sample of (10%) of the sampled respondents for purposes of quality control and data cleaning where necessary before data was uploaded into the server by the data enumerator. This



was done by the study supervisor and the lead consultant. All collected data forms were checked for completeness, correct use of the question skips, consistence of codes and logic. Any flagged queries were shared with the research team. The following were done to ensure data before and during the data collection;

1. Harmonizing our understanding on targeted indicators with the IOM team. In doing this, indicator definitions and measurement approaches were well defined as per the IOM M&E system.
2. Draft data collection instruments were discussed, reviewed with the IOM team.
3. Enumerators with Bachelor degrees and with experience in data collection were trained before data collection. They were trained in different aspects of conducting interviews. Mock interviews were held as part of the training to give enumerators classroom-based experience of conducting interviews.
4. Pre-testing of instruments was done using the peer-to-peer approach by the research assistants to give a better grasp of what will be expected of the team.
5. Filled data collection instruments were reviewed by the consultant to get rid of the errors. Questionnaires which were found to have been poorly administered were rejected and repeated the following day.
6. The research team also met to discuss the research process at the end of each day to address any loopholes.
7. There was also editing of questionnaires at the end of each day to identify any gaps for corrective action, as well as conducting preliminary analysis for early identification of data quality issues for redress.
8. During the initial phone contact that RAs made to potential respondents, they agreed on possible interview date and time and also sought consent from respondents before administering any questionnaires.
9. The consultant worked closely with the IOM team at critical stages of the evaluation such as inception report, training research assistants and data collection, review and addressing all feasible comments on draft report.
10. Data Validation and Triangulation/ Learning Event: A virtual dissemination workshop with different national, district stakeholders and implementing PRAs will be organized to ensure that all data collected is validated at national levels for consistency. This will include triangulation with other secondary sources of data to ensure that data falls within a certain plausible range.

Hypothesis:

On the onset of data collection One hypothesis the baseline had was that PRAs that have undergone the 2-day training would be more aware of what each of the IRIS indicators really entails, and could answer more truthfully or accurately than non-project PRAs that are less familiar with these indicators.

Figure 2: Quality assurance process

Issue	Action to ensure quality
Theoretical underpinnings	<ul style="list-style-type: none"> ✓ Ensuring wide publicity of the assignment among key stakeholders ✓ Study framework with clear logic ✓ Robust data collection tools ✓ Relevant questions
Study rigour	<ul style="list-style-type: none"> ✓ Training of research team in research protocols, protection and respect of human subjects ✓ Careful data collection and recording ✓ A systematic, thorough analysis
Researcher conduct	<ul style="list-style-type: none"> ✓ Ethical behaviour – gain consent ✓ Participation of the target group ✓ Respect for different perspectives ✓ Ensuring time allocated to conduct the checks/reviews is reasonable; ✓ Keeping constant communication with the client on the progress of work



Issue	Action to ensure quality
Credibility of results	<ul style="list-style-type: none"> ✓ Triangulation ✓ Validation by informants and peer review ✓ Link between data and conclusions
Utilization of findings	<ul style="list-style-type: none"> ✓ Relevance to policy ✓ Relevance to the study objective. ✓ Clear reporting and active dissemination

COVID 19 Risk mitigation plan

The consulting team adhered to the SOPs related to COVID 19 in Uganda recommended by MoH and WHO and used them in the implementation of this assignment. The table below presents the COVID 19 risk mitigation plan the study adhered to.

Figure 3: COVID 19 risk and Mitigation Plan

Stage/Activity	Risk	Mitigation plan
Inception meetings by consultant	COVID 19 transmission due to poor social distancing and sharing of meeting materials	<ul style="list-style-type: none"> • Use of virtual online meetings
Interaction by consultants with National level stakeholders	COVID 19 transmission due to poor social distancing and sharing of meeting materials	<ul style="list-style-type: none"> • Use of virtual online meetings and phone interviews.
Interaction with DLOs	COVID 19 transmission due to poor social distancing and sharing of meeting materials	<ul style="list-style-type: none"> • Use of virtual online meetings and phone interviews.
Workshop for validation of findings	COVID 19 transmission due to poor social distancing and sharing of meeting materials	<ul style="list-style-type: none"> • Use of virtual online meetings

Data Analysis

In light of the mixed approach adopted in the investigations, the analysis plan followed a similar layout. The subsequent sections present a detailed description of the analysis plan organized by qualitative and quantitative methodologies.

Qualitative Data Analysis

All qualitative data was transcribed and responses to each question were assigned codes and labels which were used during data analysis. All data collected was analyzed based on content and selected themes as stated in the ToRs. Hence both content and thematic analysis was done. Generated data was summarized in matrix format, and triangulated to guide interpretation of the quantitative results.

Quantitative data Analysis

The quantitative data analysis was done particular for: (i) describing the characteristics of the respondents considered in the quantitative tools; (ii) Addressing the first specific objective of baseline survey. The analysis was done using SPSS 20.0 and the products generated using Microsoft Excel 2016 at two stages:

- (i) A descriptive summary of characteristics of respondents was undertaken using frequency distributions and summary statistics, where applicable and (ii) cross tabulations to test for relationships between some variables.



Ethical Consideration

The following ethical considerations were taken into account in undertaking the baseline survey process:

- i. The consultant obtained introduction letters from IOM to the administrative leadership of the assessment districts through the MoGLSD.
- ii. All the research team were trained in “**I KNOW GENDER COURSE**” to ensure knowledge and adherence to human rights and dignity of participants in compliance with ethical standards relating to conducting research with human participants and the relevant local authorities were informed about the study to allay any fears and suspicions.
- iii. During data collection, no names of respondents were recorded anywhere on the consent form or questionnaire and no family information was shared with the other. Unique identifiers were allocated to each respondent for purposes of tracking.
- iv. Only the study team had access to the data. The data set was protected with a password and with limited access to any other user who meets the requirements to access. Data was stored according to IOM’s data protection guidelines.
- v. To ensure that KII participants cannot be linked to their statements, they were asked to pick a stage name or symbol/a number to be identified by during the discussions. No identifiers were recorded.

Protocol for reinforcing anonymity and confidentiality

Standard protocol was considered in order to reinforce the anonymity and confidentiality of all persons involved in the study. As standard protocol prior to beginning the individual interviews, the research assistants verbally informed the respondent that their responses remain confidential and that, unless there was a need to report an incident to the authorities their name will never be associated with any of the data collected. The respondents were assured that the data collected would be stored in a database that only the key research analysts had access to. Data was to be reported on in an aggregate manner and no respondent’s name would not be written on any data sheets (no response would be linked to any individual).

Description of Security Measures:

The study potentially collected sensitive information. Confidentiality was maintained along the following facets:

- (1) Though individual names were required for sampling purposes only, all individual names used for sampling were immediately disposed of after the interview commenced. However, unique identifiers to respective PRAs was maintained for spot-checks by the IOM quality assurance team.
- (2) The research team at IOM Office was responsible for the use, storage, and safe disposal of all study records. Consent forms were to be stored in the regulatory office at the activity’s project office.
- (3) A participant had the right to withdraw from the study at any time and for any reason. In addition, a participant would be withdrawn from the study by the study team under special circumstances, for example for protection of their safety.

The study team ensured that they maintained the confidentiality of all information entrusted to them. All records were maintained in a secure and locked location. The research team also emphasized to the participants the need to maintain confidentiality.

Challenges encountered during data collection:



The baseline study was disrupted by a number of delays not limited to the lockdown by the Government of Uganda as an approach to manage the COVID-19 infection rates by over 40 days that disrupted movement of any kind as such affected access to the PRAs during the first phase of the data collection period. At the time of commissioning the baseline study; a number of eight (8) PRAs had their recruitment license revoked for lack of compliance to standards and as such access to the other PRAs during the study was suspicious affecting the response rate as the leadership structure of the PRAs to be interviewed express fear and not comfortable to freely provide required information. As a result of the lockdown and restrictions on movement, the consultant team developed an online platform for self-administered survey with PRAs. However, this only received a response rate of 8% after 35 days of launching the online tool attributable to limitations on using this platform. With the support of the IOM leadership, a new alternative was negotiated with UAERA to have physical access to the PRAs upon lifting of the lockdown. During the data collection process quite an amount of data was not accessible from the PRAs such as operational documentation, database of Migrant labour that have benefitted from the services of the respective PRAs as access to this information was considered suspicious.

FINDINGS AND DISCUSSIONS

This section provides findings of the study and discussions on potential implications on implementation and how to influence the policy space for ethical recruitment practices in Uganda. The findings presentation shows triangulation of the quantitative data with the qualitative inquiry from key informant interviews and a significant amount of literature review from multiple sources.

TABLE 2: OUTCOME INDICATOR TRACKING TABLE

The outcome indicator tracking table provides the indicator values at baseline stage and narrative review of the indicator of measure justifying feasibility of measure to guide on measurement at end line. This is on the basis of the interaction with the indicator potential for measure during the baseline data collection.

INDICATORS	Baseline Value	Narrative review of indicator measure
Number of migrant workers recruited through IRIS compliant PRAs.	0	Data need to be discussed with PRAs following that majority are not very comfortable with sharing data on migrant workers
% of workers migrating through IRIS compliant PRAs that experience an ethical recruitment process.	0	The consultant proposes to be able to measure this indicator going forward this should target only PRAs that will have agreed to undergo the capacity building Programme. However, this could have to go through a consultative engagement with the PRAs
% of PRAs providing alternative and safe recruitment channels to migrant workers.	77%	Measurable indicator but should only target trained PRAs
Number of PRAs that are IRIS compliant	0	Measurable but need to target PRA That have reached/achieved Level 2 Tier 2 in the IRIS CB program.
% of PRAs trained who report introduction of ethical practices into their work	13%	Measurable
% of Private Recruitment agencies, CSO and Local Government leaders with increased knowledge in alternative and safe recruitment channels to migrant workers.	0%	Measurable

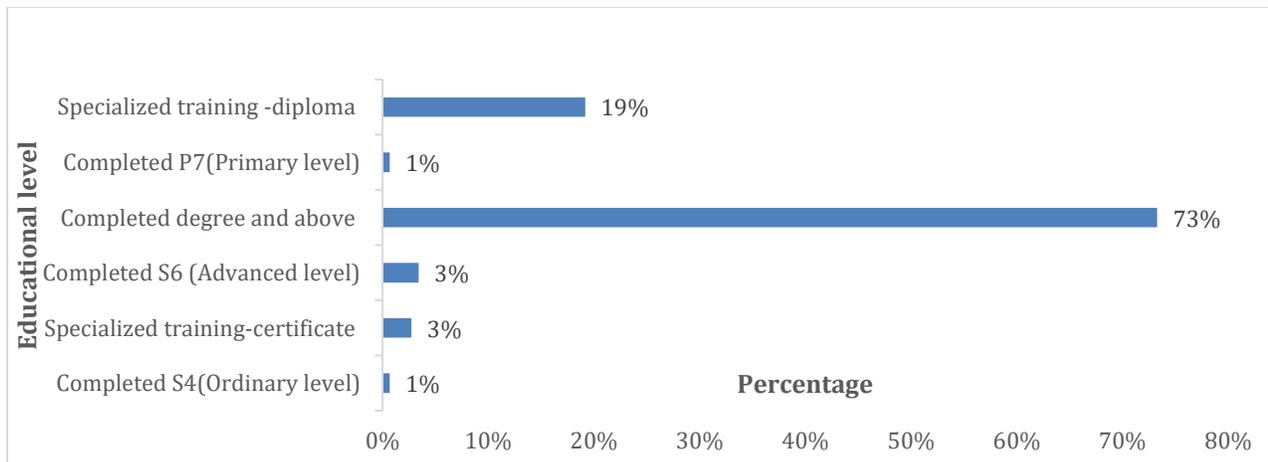


% of trained PRAs progressing towards ethical recruitment standards aligned to IRIS standards.	0 %	Measurable
% of MGLSD and business partner line ministry department units that have incorporated Labour Externalization program policy framework implementation in their departmental operation work plan	0%	Measurable
% of MGLSD and Line ministry departments participating in monitoring ethical recruitment processes	0 %	Measurable

BACKGROUND CHARACTERISTICS OF THE PRIVATE RECRUITMENT AGENCIES

This section of the report discusses the background characteristics of the Private Recruitment Agencies such as highest educational level, year the PRAs were established and attained operational license, staffing sex ratio and regions the agencies export to labour from Uganda.

FIGURE 4: HIGHEST EDUCATIONAL LEVEL OF RESPONDENT

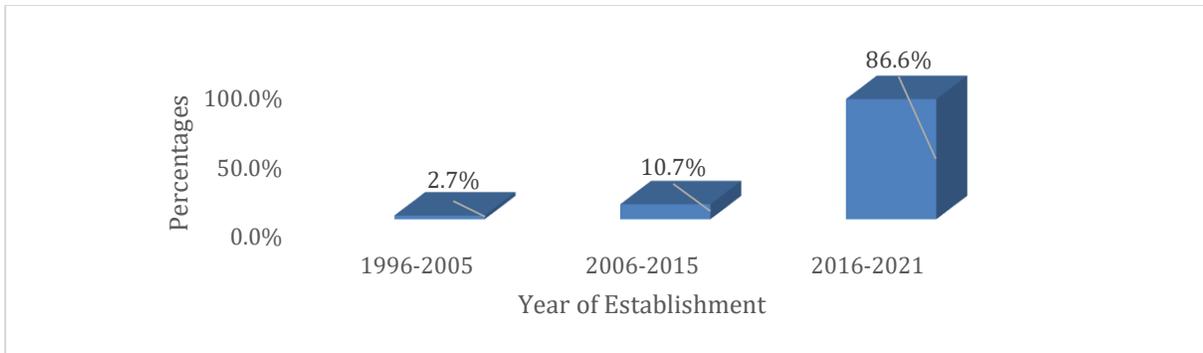


Source: IOM Baseline Study, 2021

The majority of the respondents have completed a bachelor’s degree and above. The study design required that the company leadership participated in the interviews unless under delegation. The findings align with the registration requirement of at least a bachelor’s degree requirement for the leadership structure prior to registration.

FIGURE 5: YEAR OF ESTABLISHMENT OF THE PRIVATE RECRUITMENT AGENCIES





Source: IOM Baseline Study, 2021

The majority of the PRAs were established between 2016-2021 in Uganda. This could be attributable to a ministerial statement by Minister of State for Gender and Culture Affairs/ holding the portfolio of Minister of Gender, Labour and Social Development presented to parliament in 2019. A person cannot transact business as a recruitment agency in Uganda without a valid license. Today there are 213 licensed recruitment companies that are deploying workers out of Uganda.

The issues presented to parliament included

- The background to the regulation externalization of labour;
- Protection of workers through licensing and placement procedures;
- The benefits and challenges of externalization of labour;
- The proposal to impose a ban on the externalization of labour Programme;
- The measures that the Government of Uganda has taken to make the externalization of labour Programme safe, regular, orderly and productive;
- The support that Parliament should lend to our efforts of making the externalization of labour safe, regular, orderly and productive.

Table 3: The recruitment licensing requirement

- A person to be granted a licence to operate as a recruitment agency under these Regulations shall be a company incorporated under the Companies Act, 2012.
- All the shareholders and the directors of a company referred to in sub regulation (1) shall be Ugandans.
- The company shall have a minimum authorized capital of fifty million Uganda shillings and
 - a) where the company has been in existence for a year or less, the company shall have an account balance of not less than ten million Uganda shillings;
 - b) where the company has been in existence for more than one year, the company shall have a verified financial statement, income tax returns for the preceding one year and an account balance of not less than ten million Uganda shillings

Source: The employment (Recruitment of Ugandan Migrant Workers) Regulations, 2021 – Statutory Instruments Supplements No. 26: 6th August 2021.

TABLE 4: YEAR PRA INTERVIEWED WAS ESTABLISHED VS WHEN PRA ATTAINED A LICENSE



Year	1996	1997	2000	2004	2005	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	Total
Number of PRAs Established	1	0	1	1	1	1	1	0	2	4	1	4	3	9	15	67	30	4	4	149
Number of PRAs Licensed	0	1	0	0	1	0	0	1	1	1	0	3	2	3	7	51	50	14	14	149

Source: IOM Baseline Study, 2021

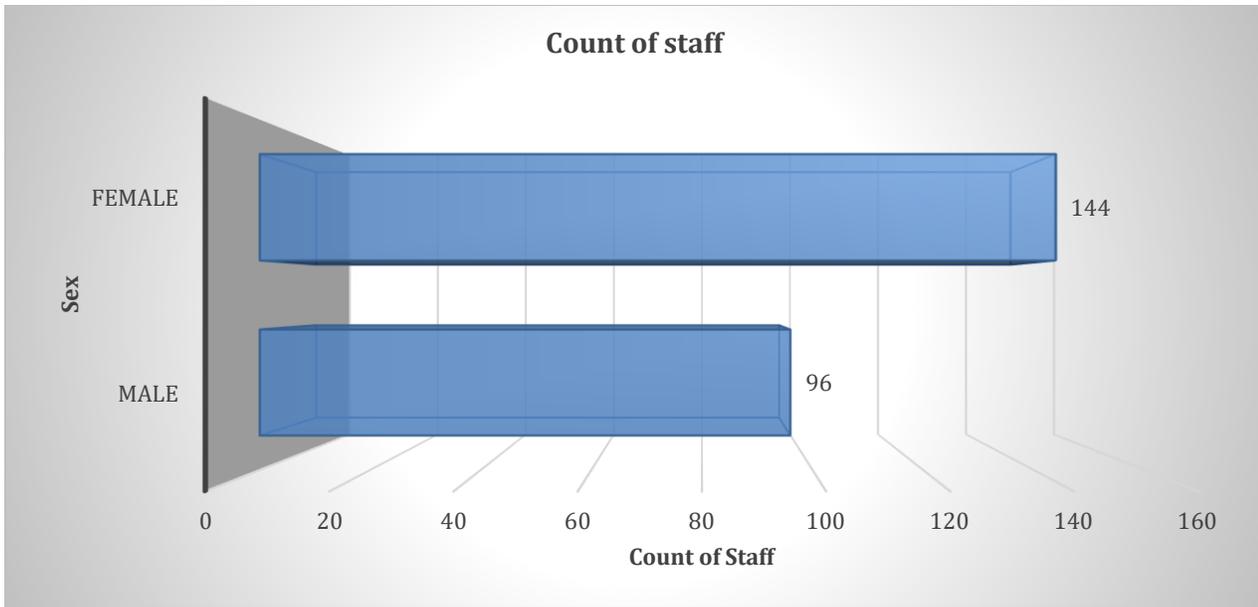
The baseline also interacted with the currently registered PRAs to understand the years of establishment and registration in Uganda. The operations of the PRAs without license in Uganda was of less attention according to the table 1 above however the trend significantly changed in 2018 that had over 80% of its PRAs established and registered in the same year. By the 2021 almost all PRAs established in Uganda between 1996 to 2021 had obtained a recruitment license.

According the 2017 Annual TiP report over 90% of the registered victims of traffic had been trafficked by unlicensed labour recruitment individuals and Companies, a deliberate crackdown on such agents was declared. It was used as one of the ways of preventing the trafficking of persons. Over 80 illegal recruitment individuals and Companies were investigated during the year under review. The offices for all those investigated were closed and some of the Directors and Individuals were prosecuted for illegal recruitment and promotion of trafficking. In order to prevent trafficking in persons through disorganized labour export and migration, the Ministry of Gender, Labour & Social Development, in collaboration with the Ministry of Internal Affairs, the Police, Immigration, Civil Aviation Authority and Security Agencies enhanced the regulation, guidance and monitoring of the Licensed Recruitment Companies, through regular consultation meetings and sharing of information related to labour externalization business.

As a result of the consultations and continued analysis of the loopholes that had been promoting trafficking in persons through the Airport, a joint clearance desk was created at Entebbe Airport for Ugandan migrant workers intending to travel abroad for jobs. The Ministry also introduced a digitalized Integrated Information System for Labour Recruitment Issues to enhance timely and transparent service delivery.

FIGURE 6: STAFFING SEX RATIO WITHIN THE PRA SECTOR



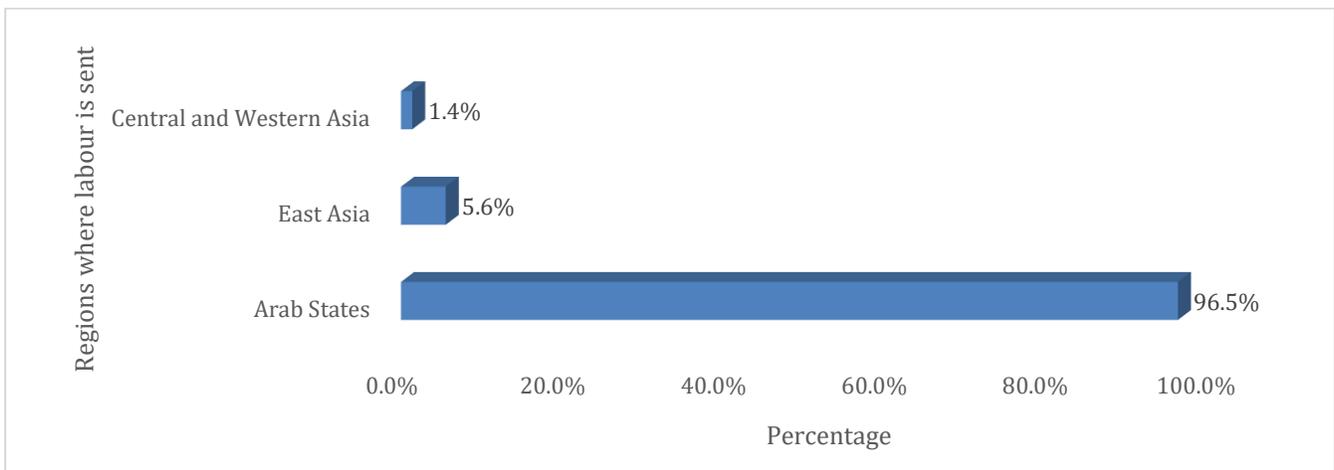


Source: IOM Baseline Study, 2021

The staffing sex ratio within the PRAs in Uganda is nearly 2:1 (Female vs Males) which is the reverse of the majority of the corporate recruitment spaces in Uganda. This ratio then provides for the need to put in place clear staff safety protocols in place that meet the needs of a women in employment. An exploratory research would be recommendable to understand the staff safety measures in place for the staff in the PRAs sector as critical service sectors in charge of labour externalization.

Most of the staff within the PRAs don't have official contracts of operation and if they do exist these are shorter term; a flexibility that male workers will out rightly challenge as compared to their female counterparts. The remuneration of the staff of the PRAs are quite low which does not attract their male counterparts- Key Informant Interview

FIGURE 7: REGIONS WHERE PRAS EXTERNALIZED LABOUR FROM UGANDA



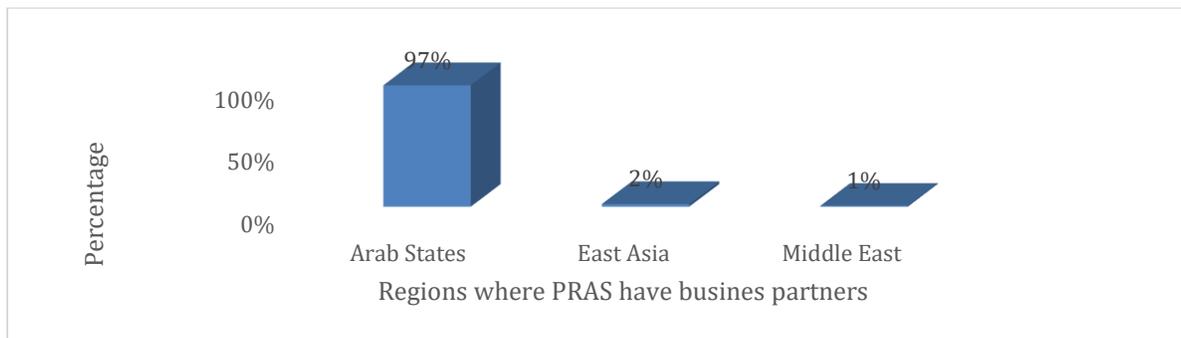
Source: IOM Baseline Study, 2021



The majority of the Private Recruitment Agencies send labor to the Arab States (96.5%) and least to the Central and Western Asia (1.4%). This is attributable to the fact that the Arab states have provided for numerous opportunities for the classification of jobs that migrant workers find viable for the migrant workers.

According to the Annual TiP report, there is a need to engage more foreign countries to sign joint bilateral labour agreements as a way of streamlining the rights and protection of Ugandans who go to the Middle East for work. The Ministry of Gender, Labour & Social Development in collaboration with Ministry of Foreign Affairs is currently engaging more Middle East Countries for Bi-Lateral Labour Agreements. By the end of 2019, negotiations with Qatar had been completed pending a signing ceremony. This shall be the third Country in region following signing of similar agreements with the Kingdom of Saudi Arabia and Jordan in 2016.

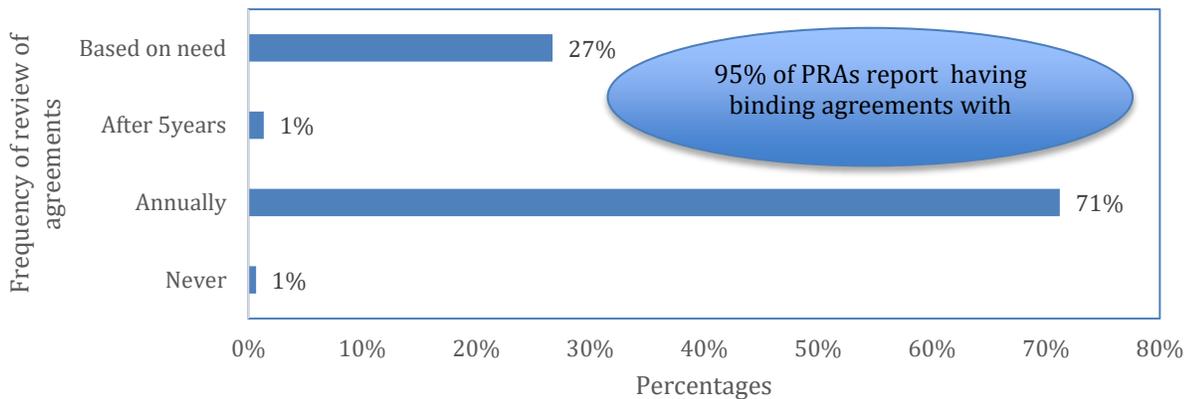
FIGURE 8: REGIONS WHERE PRAS HAVE BUSINESS PARTNERS AGENCIES



Source: IOM Baseline Study, 2021

The majority of the business partner agencies are in Arab states (97%).

FIGURE 9: FREQUENCY OF REVIEW OF AGREEMENTS WITH BUSINESS PARTNERS



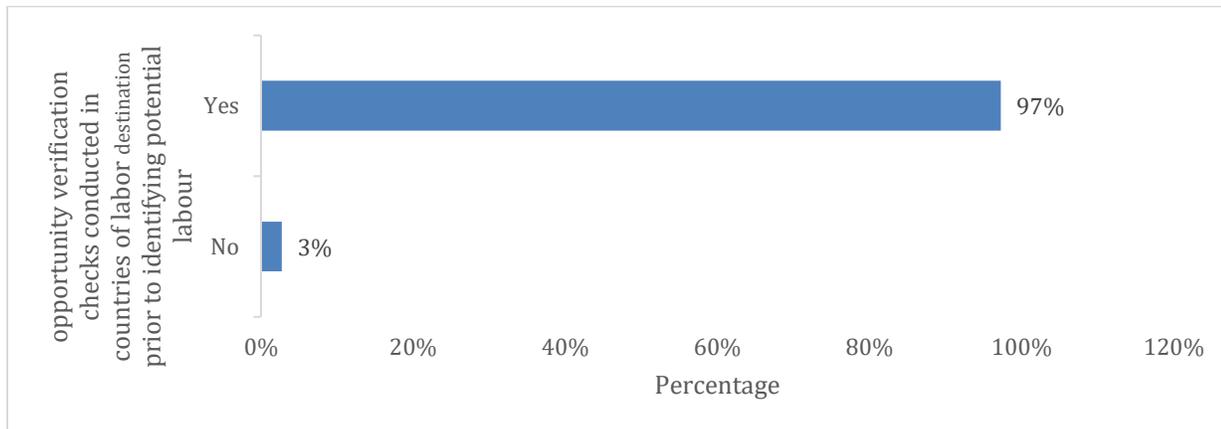
Source: IOM Baseline Study, 2021

The majority (95%) of the PRAs have contracts services with their business partners in the countries of destinations. Seven in every ten of the PRAs with binding agreements have these reviewed annually and three in every ten have the reviews done based on a need basis. Uganda has a mission abroad that supports the MoGLSD with monitoring. Through the technical committees, they review agreements and access the implementation of terms signed up in the agreements.



In case of any gaps in the agreements, the committee recommends a review to be done. This committee meets twice a year with alteration in the meeting locations.

FIGURE 10: OPPORTUNITY VERIFICATION CHECKS CONDUCTED IN COUNTRIES OF LABOUR EXPARTRATION

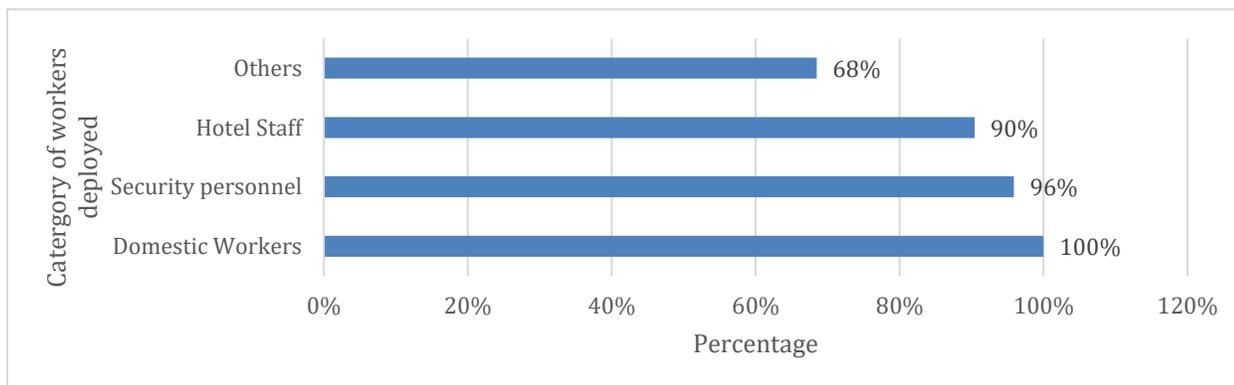


Source: IOM Baseline Study, 2021

Ninety-seven percent (97%) of job opportunities are verified prior to availing them onto the market for potential workers to express interests.

We have our mission abroad that acts as our eye in charge of monitoring. This is done through joint technical committees that review the agreements and assess the implementation of the contracts. These committees meet twice a year with exchange in meeting places. – Key Informant MoGLSD

FIGURE 11: CATEGORIES OF WORKERS DEPLOYED OUT OF UGANDA



Source: IOM Baseline Study, 2021

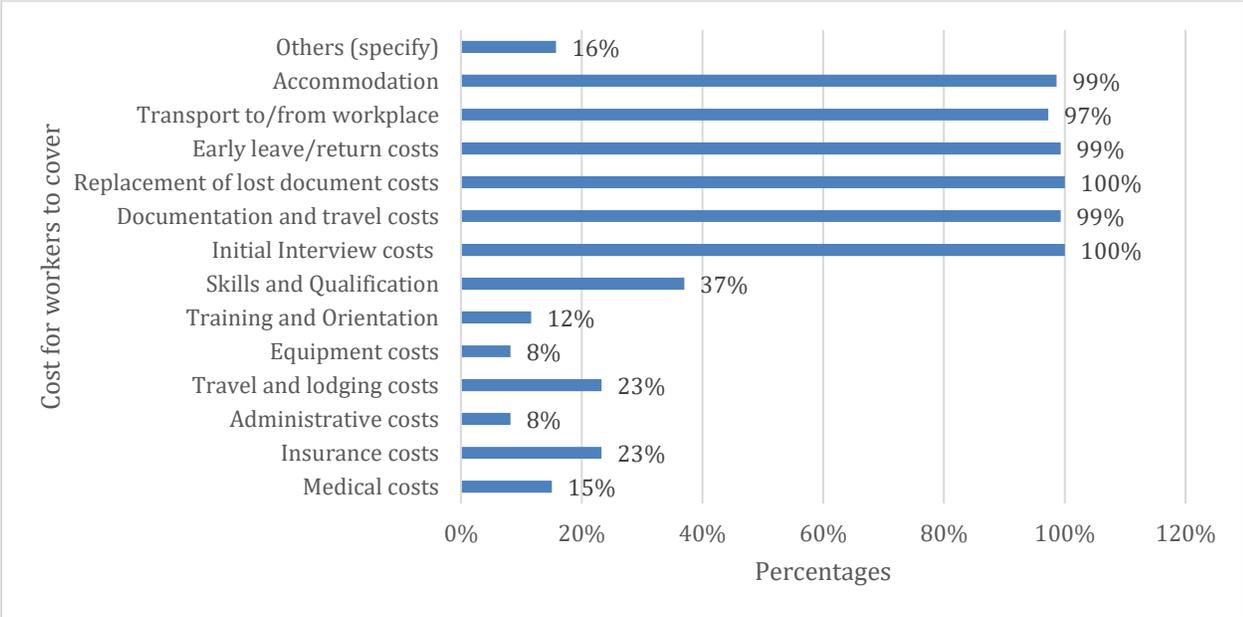
The most sourced out jobs from Uganda are domestic workers’/ house keepers, security personnel and hotel staffs. The other jobs opportunities include nurses and cleaners.

According to 2019 Annual TiP report the districts of Kampala, Tororo, Namisindwa, Mbale, Manafa, Wakiso, Moroto, Napak, Luwero, Butaleja, Mukono, Kiryandongo, Mayuge, Luwero, Jinja, Buikwe, Busia deployed the majority of workers from Uganda.



The Uganda Association of External Recruitment Agencies (UAERA) estimates that more than 160,000 Ugandans are working in Gulf Cooperation Countries. According to the Ministry of Finance, Planning and Economic Development, a total of 8,830 Ugandans left the country in June 2021 in search of jobs. However, such workers remain vulnerable to extortion and exploitation both during the recruitment process and in the destination countries.

FIGURE 12: COST FOR WORKERS/ JOB SEEKERS TO COVER

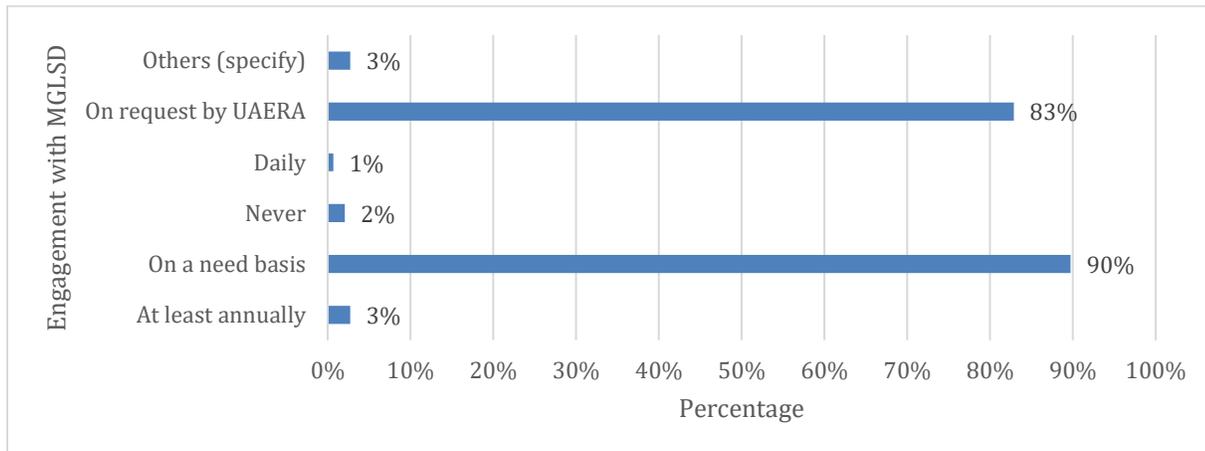


Source: IOM Baseline Study, 2021

There is evidence of understanding of costs that should be met by the workers that include Accommodation, transport to/from workplace, early leave; return travel, replacement costs, document and travel costs and initial interval costs. However, there is need to also educate the potential migrant workers and the PRAs on costs that should be covered by the employer that the job seekers are currently meeting according to the understanding provided by the PRAs in Figure 13 above such as skills and qualification, travel and lodging, insurance, medical among others. These disparities could also be attributable the differences in the responsibilities that the respective study subjects hold within these agencies. When the recruitment process is initiated by the employer then the employer should cover the costs. This includes situations where the employer recruits a worker and elects for permanent residency over a work permit.



FIGURE 13: FREQUENCY OF ENGAGEMENT OF PRAS WITH THE MINISTRY OF GENDER LABOUR AND SOCIAL DEVELOPMENT



Source: IOM Baseline Study, 2021

The majority of the PRAs engage with the MoGLSD based on a need based (90%) and or on request by UAERA (83%). That engagement often includes the need to sign off the PRAs training reports. At the moment, there is not a structured need for PRAs to have routine engagements with the MoGLSD as a standard requirement and as such the design in which the engage.

ROLE OF DLOs AND MoGLSD PLAY IN MONITORING QUALITY OF SERVICE

- Inspection of workplaces – the MoGLSD doesn’t involve us (Labour Officers) however external recruitment has been left to be handled by the central role of MoGLSD.
- Labor Officers also carry out health and occupational safety monitoring at workplaces
- Also supervise internal recruiters to ensure that occupational health standards are followed.
- The Employee services bureau supports in the internal recruitments. The Local government puts emphasis on screening in internal recruitments and encourages people to remain and have recruitments here in Uganda than accessing jobs from outside.

COVID-19 PANDEMIC AND THE OPERATIONS OF PRAS.

This section presents the findings on the effect COVID-19 pandemic had on the PRAs work and mitigation plans the PRAs in case of related uncertainty.

TABLE 5: WHAT EFFECTS DID THE COVID-19 PANDEMIC HAVE ON YOUR BUSINESS?

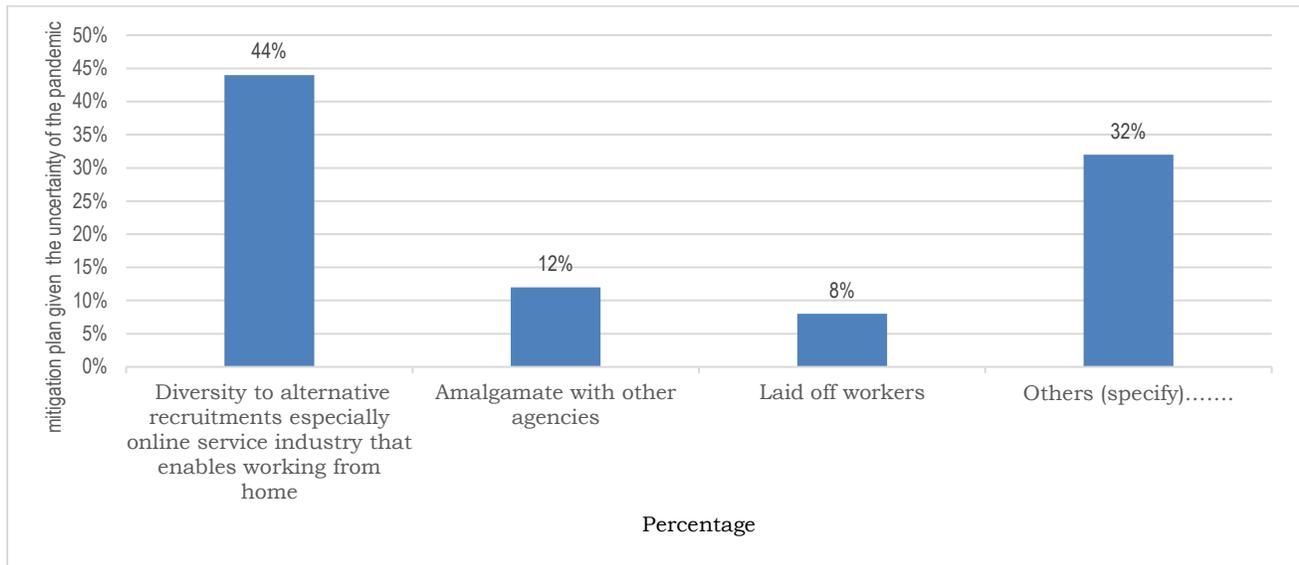
Reduction in revenue	71%
Increased our operation costs	80%
Lost clients	69%
Reduction in the number of job seekers	100%

Source: IOM Baseline Study, 2021

The greatest effect COVID-19 had on PRAs was reduction in the number of job seekers (100%), followed by increase in the operation cost (80%) and reduction in revenue (71%).



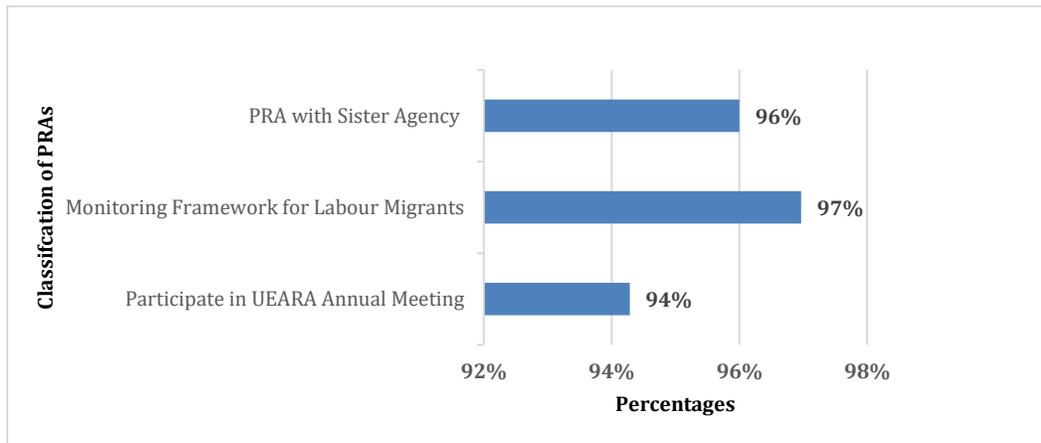
FIGURE 14: MITIGATION PLAN TO EFFECTS OF COVID BY PRAS GIVEN THE UNCERTAINTY OF THE PANDEMIC



Source: IOM Baseline Study, 2021

The majority of the PRAs opted for diversity to alternative recruitments especially online service industry that enabled for working from home (44%) and others (32%) that included provision of COVID-19 response PPEs to bridge the gap the halt that had be caused by no movement and as such no access to potential migrant workers, ventured in agriculture products sales as these were considered essential services.

FIGURE 15: CLASSIFICATION OF PRAS

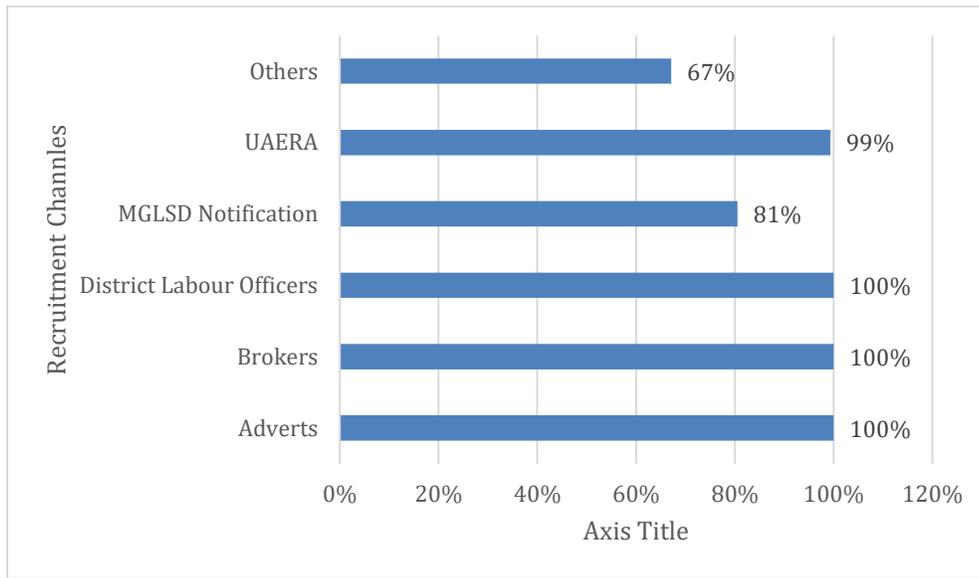


Source: IOM Baseline Study, 2021

The majority of the PRAs have business partner agencies in the destination countries (96%), 97% have monitoring frameworks for migrant workers and 94% participate in UAERA annual meetings. This should be a great opportunity to set in place a more reliable grievance management system that can be able to increase migrant safety and build trust in the recruitment industry by potential seekers.



Figure 16: Recruitment Channels



- Other Recruitment Channels**
- Websites
 - Walk ins
 - Referrals
 - EEMIS for job offers
 - Posters
 - Overseas migrant workers
 - Social Media
 - Other agencies

Source: IOM Baseline Study, 2021

All the PRAs interviewed use brokers, adverts, district labour officers (100%), 99% also use UAERA while 67% have access to their sources that include referrals by migrant workers in potential destination countries.

According to an interview with the MoGLSD, the opportunities go through a verification check done by the ministry to ascertain the validity of the opportunities before these are made public for the other recruitment channels to utilize.

CHALLENGES FACED AT THE DIFFERENT LEVELS OF THE RECRUITMENT CHAIN

This section presents the challenges faced by different groups of persons within the recruitment chain such as challenges encountered between migrant workers and their employers, challenges PRAs face with the migrant workers and challenges faced between PRAs and the employers of migrant workers.

According to a study on “The Role of Recruitment Fees and Abusive and Fraudulent Recruitment Practices of Recruitment Agencies in Trafficking in Persons” Recruitment agencies play a legitimate and indispensable role in the smooth and efficient operation of labour markets.

There might be complex supply chains that necessitate levels of coordination and expertise that are not easily found within a given company because the challenges are spread out over multiple countries and time zones, and workforces are in many instances comprised of workers from different parts of the world. Recruiters and recruitment agencies are especially sought in sectors where there is a seasonal demand for workers, in situations where workers and employers do not speak a common language, or where aspiring workers need to travel long distances (including across borders) to reach the job site. Companies also turn to recruitment and job placement agencies to manage the inherent challenges related to recruitment and hiring, while jobseekers look to recruiters to help them navigate the complex waters of migration for employment.

Recruitment agencies can be involved throughout the recruitment, job placement, and employment processes. Agencies can take responsibility for visas, medical check-ups, travel arrangements, pre-departure orientation and training, and even contract negotiation. Recruitment agencies can take various forms and shapes, running the gamut from one



individual recruiter or loose networks of intermediaries to small or mid-size agencies, or multi-national enterprises with global operations. In addition, terminology used for recruiters and recruitment agencies and their status in national contexts differs from country to country. While in some countries there is a high level of regulation and licensing of recruitment agencies, in other countries there is a minimal regulation and recruiters often operate in regulatory “grey zones” where their responsibilities for worker protection are unclear or non-existent. , United Nations Office on Drugs and Crime (2015).

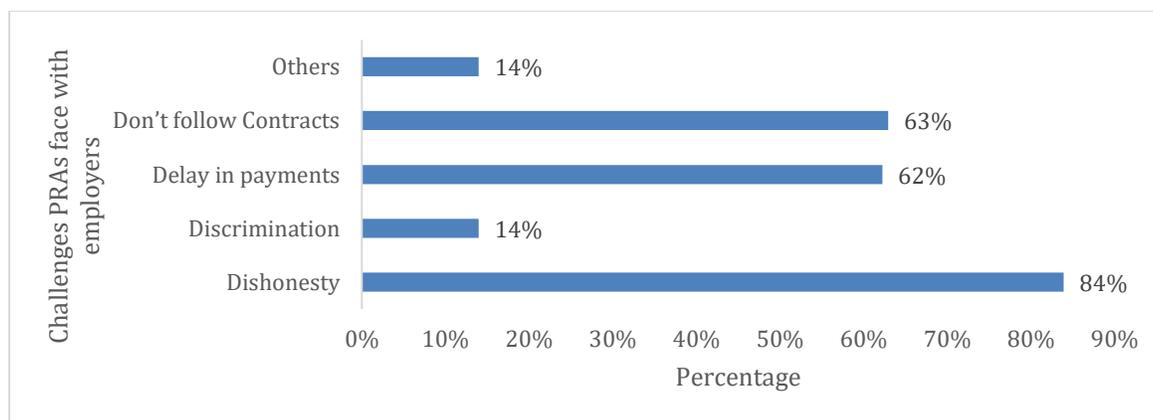
TABLE 6: CHALLENGES FACED BY PRAs DEALING WITH JOB SEEKERS

Language barrier	63%
Illiteracy among the job seekers	26%
Falsification of document/ Inconsistency in documentation	3%
Lack of trust	5%
Lack of patience	3%

Source: IOM Baseline Study, 2021

The main challenges PRAs encounter dealing with job seekers is language barrier attributable to their limited command and comprehension of the English language accounting for 63%, followed by illiteracy among the job seekers. Despite the fact that the minimum requirement of job seekers to meet the basic requirement is secondary school ordinary certificate, quite a number of the potential migrant workers struggle with English language comprehension. This could potentially be addressed if the PRAs could be intent within their own staffing structure to have quite some good representation of staff from the regions of Uganda that are predominantly providing workers for externalization.

Figure 17: CHALLENGES PRAS FACE WITH EMPLOYERS



Source: IOM Baseline Study, 2021

The study sought to understand the kind of challenges PRAs encounter while dealing with employers and the majority reported the fact that employers were dishonesty and as such this contributed to their inability to align to the contractual obligation and delay in payments as per terms within the contracts.



TABLE 7: WHAT CHALLENGES DO MIGRANT WORKERS FACE IN THEIR PLACES OF EMPLOYMENT

Sexual assault & harassment	49%
Physical assault	31%
Denial of wages	29%
Lack of benefits such as pension	11%
Discrimination due to cultural differences	29%
Poor housing	6%
Confiscation of passports/travel documents	9%
Child Labour	6%
Segregation due to cultural diversity	11%
Grand Total	100%

Source: IOM Baseline Study, 2021

According to the PRAs interviewed the most prevalent reported problems encountered by migrant workers in their places of employment are sexual assault & harassment (49%), physical assault (31%), denial wages (29%) and discrimination due to cultural differences (29%). These have a high effect on productivity of the workers on duty that need to be addressed with the business partner agencies and functionalizing the grievance management systems for timely response upon reporting of abuse by the workers. While document confiscation is a known breach to an IRIS principle, it’s not considered a problem by the PRAs and as such paramount the disadvantages of confiscation of passports/travel documents discussed for all to understand and support in its redress.

TABLE 8: WHAT CHALLENGES DO EMPLOYERS FACE WITH THE MIGRANT WORKERS?

Language barrier	79%
Illiteracy among the job seekers	24%
Lack of trust	26%
Falsification of document/ Inconsistency in documentation	6%
Others (Specify).....	26%
Grand Total	100%

Source: IOM Baseline Study, 2021

According to the PRAs interviewed; they perceived the likely challenges the employers find with the migrant workers is language barrier (79%). This is attributable to the fact that most of workers are deployed in Arabic speaking countries. While within the pre-departure training curriculum, Arabic as a language is taught for one day of the one week’s training programming. This is not sufficient enough time for an effective training to happen for language comprehension. For a country like Uganda that has a significant fraction of young people seeking employment in these countries, application of a longer period of training to be considered for potential migrant workers which will possibly address some of the challenges faced across the continuum that is attributable to language barrier.



Table 9: CHALLENGES FACED BY PRAS IN THE TRADE

- They don't reveal the challenges that the 'NKUBA KYEYO' a Luganda term for migrant workers will find along the way.
- They hide information from the job seekers they are in business
- Job seekers pay a lot of money for the jobs, some sell property
- Some job seekers are duped as some agencies are not registered
- Getting licenses from the MoGLSD, this is a very rigorous system for most of the PRAs
- Some Regions like the sub region, cultural leaders don't accept taking their people to countries like Dubai for fear that the migrants' internal organs will be removed.
- Political Interference, in most cases the politicians use these PRAs for their political gains
- At times parents of the job seekers, want to be paid off by the PRAs, claiming that they are taking their children who have been supporting them.
- No screening is done especially for the domestic workers since there is no fee paid, so they end up taking up all sort of individuals.

Source: Key Informant Interview, IOM Baseline 2021

INTERNATIONAL RECRUITMENT INTEGRITY SYSTEM (IRIS) STANDARD

According to International Organization for Migration (2021); Ethical recruitment means hiring workers lawfully and in a fair and transparent manner that respects and protects their rights. The IRIS Standard is a set of global principles that define ethical recruitment. It is based on international labour and human rights instruments and was developed through extensive multi-stakeholder consultation. The IRIS Standard articulates what ethical recruitment means in practice and how labour recruiters can demonstrate compliance. The IRIS Standard and corresponding guidelines serve as a reference point for labour recruiters, employers and state actors on how to integrate ethical recruitment principles into recruitment-related management systems, policies, regulations, processes and procedures. To achieve this, the IRIS Standard defines operational indicators against which labour recruiters can be measured to assess compliance.

Ethical Recruitment is IOM's flagship initiative to promote ethical recruitment of migrant workers. It has been created by IOM and a coalition of partners from government, civil society and the private sector. IRIS is a global multi-stakeholder initiative that supports governments, civil society, the private sector and recruiters to establish ethical recruitment as a norm in cross-border labour migration.

The goal of IRIS is to make international recruitment fair for everyone involved: migrant workers, employers, recruiters and countries of origin and destination. It does this by:

- Promoting respect for the rights of migrant workers;
- Enhancing transparency and accountability in recruitment;
- Advancing the Employer Pays Principle; and
- Strengthening public policies, regulations and enforcement mechanisms.

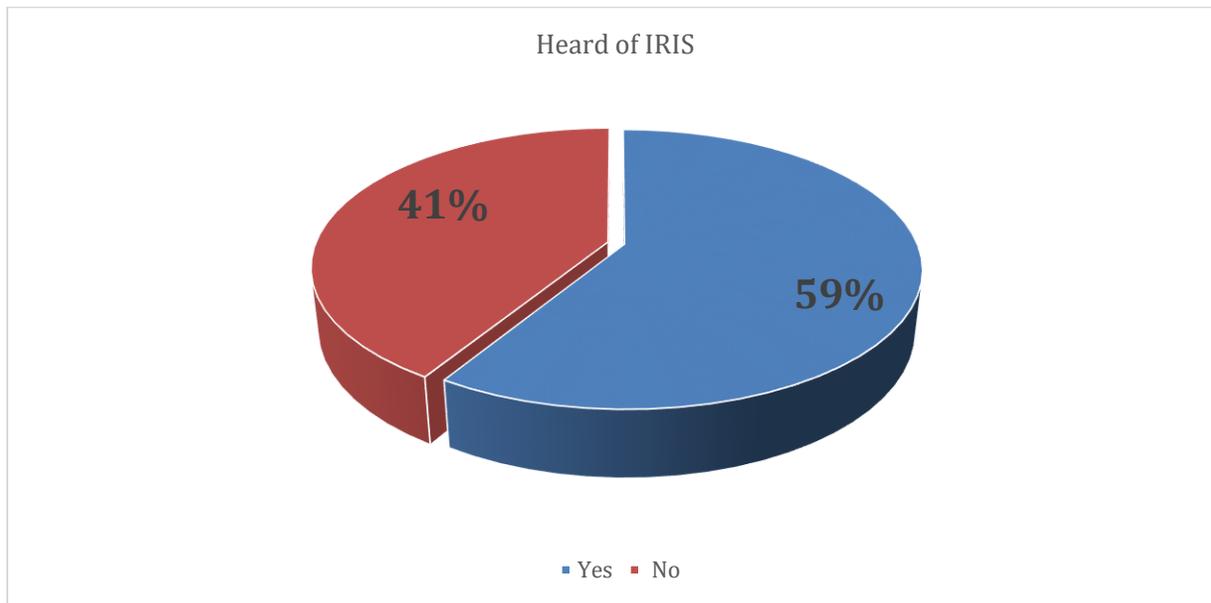
The IRIS Standard consists of two overarching principles and five specific principles. Each principle is supported by one or more criteria with corresponding sets of indicators to be met by labour recruiters to be IRIS compliant.



The seven core IRIS Principles below:

1. Respect for Laws, Fundamental Principles and Rights at Work
2. Respect for Ethical and Professional Conduct
3. Prohibition of Recruitment Fees to Jobseekers
4. Respect for Freedom of Movement
5. Respect for Transparency of Terms and Conditions of Employment
6. Respect for Confidentiality and Data Protection
7. Respect for Access to Remedy

FIGURE 18: HEARD OF IRIS



Source: IOM Baseline Study, 2021

Almost six in every ten PRAs surveyed have ever heard of IRIS.

IRIS is a mechanism that is used to rate the performance of companies. I have read through it and it is a good product if all our companies went through it, we would not have the kind of problems we are currently dealing with the workers we send out. - Key Informant Interview

According to the International Organization for Migration (2021); IRIS is a multi-stakeholder initiative that brings together a wide range of actors committed to drive positive change in the cross-border recruitment of migrant workers. Since its launch in 2014, IRIS has adopted a partnership approach characterized by close cooperation with a wide range of actors including the recruitment industry, governments, civil society organizations and trade unions, international organizations, employers, brands, industry associations as well as other multi-stakeholder initiatives and the social auditing community. These partnerships aim to establish effective platforms and create frameworks for ethical recruitment, and to generate, match and sustain supply and demand for ethical recruitment services. Our partnerships leverage the combined strength and influence of each actor to effectively promote ethical recruitment and respect for the rights of migrant workers, IOM (2021).



How can PRAs and employers support IRIS?

- Integrate ethical recruitment principles into policies and supply chain Codes of Conduct
- Promote ethical recruitment practices throughout supply chains
- Adopt the Employer Pays Principle to ensure that the costs of recruitment are borne by the employer, not by migrant workers
- Pilot test IRIS in supply chains and cross-border recruitment corridors
- Share best practices and lessons learned
- Use only IRIS-committed labour recruiters to enhance demand for ethical recruitment services and IRIS Certification

How can governments support IRIS?

- Align policy and regulation with international standards for ethical recruitment.
- Introduce registration and licensing that encourage private recruitment agencies to enroll in the IRIS Capacity Building Programme
- Strengthen the enforcement of existing recruitment regulation
- Within formal labour mobility schemes, introduce criteria that require participating labour recruiters to demonstrate commitment to ethical recruitment and a track record of good practice
- Introduce ethical recruitment provisions into bilateral labour arrangements and Memoranda of Understanding
- Encourage employers to adopt the 'Employer Pays Principle' to ensure that migrant workers are not paying the fees and costs of recruitment
- Introduce ranking and rewards systems to incentivize compliance to ethical recruitment and best practices
- Reform public procurement guidelines to include provisions of ethical recruitment
- Support grievance, remedy and referral mechanisms

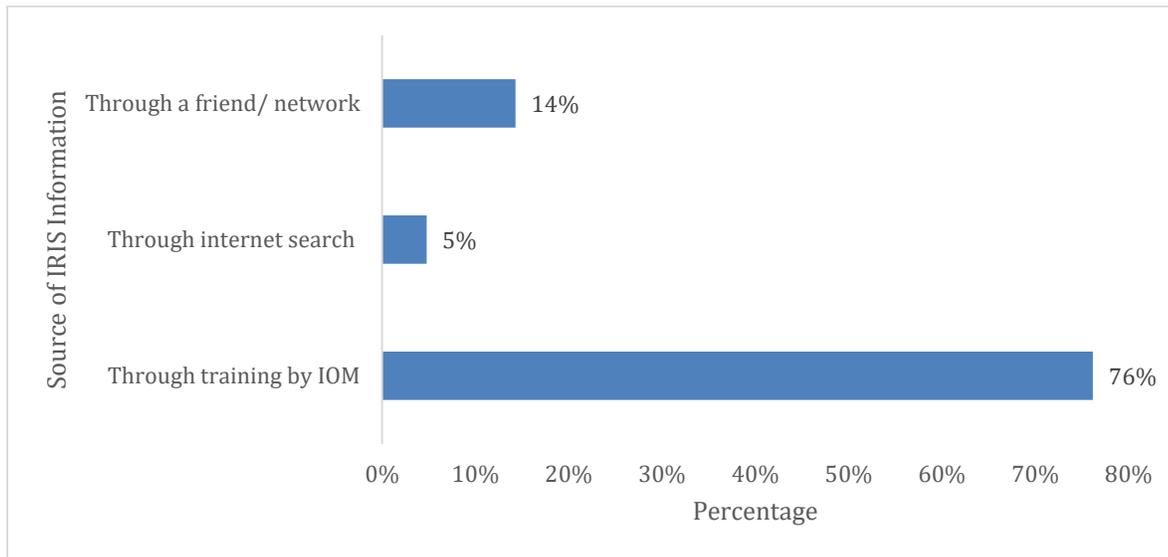
How can civil society organizations and trade unions support IRIS?

- Promote ethical recruitment through community-based outreach
- Empower migrant workers through information sharing and support
- Co-create and actively participate in worker engagement platforms
- Bring the voices of migrants to IRIS multi-stakeholder consultations
- Inform ethical recruitment due diligence and support compliance monitoring of labour recruiters
- Support the implementation of government regulation related to recruitment, migration, human rights and decent work

Worth noting, the interaction with the study sampled DLO through the key informant interviews reflected lack of understanding of IRIS by all the DLOs. The information gap on IRIS by the DLOs could be attributable to the fact that their understanding and involvement in labor externalization is limited to providing reference checks and recommendation letters to the job seekers.



FIGURE 19: SOURCE INFORMATION ON IRIS



Source: IOM Baseline Study, 2021

The biggest proportion of the respondents who had ever heard about IRIS did get this information from a training facilitated by IOM.

According to a September 2021 press release, 200 legislators have been introduced to the International Recruitment Integrity System (IRIS), an IOM tool on hiring and human resource best practices on international standards of recruitment, assessing recruiters’ practices, among other areas. This is expected to help the legislators to champion issues to do with safe labour migration pathways and use their legislative power to promote the protection of workers.

The training programme is part of the global project ‘Promoting ethical recruitment in the hotel and tourism industry’, funded by the United States’ Bureau of Populations, Refugees and Migration (PRM). It is jointly implemented by IOM and the Sustainable Hospitality Alliance, in close coordination with the Leadership Group for Responsible Recruitment, the International Labour Organization’s Fair Recruitment Initiative. A dozen Members of Parliament (MPs) from the Gender, Labour and Social Development Committee attended the first training in Kampala.

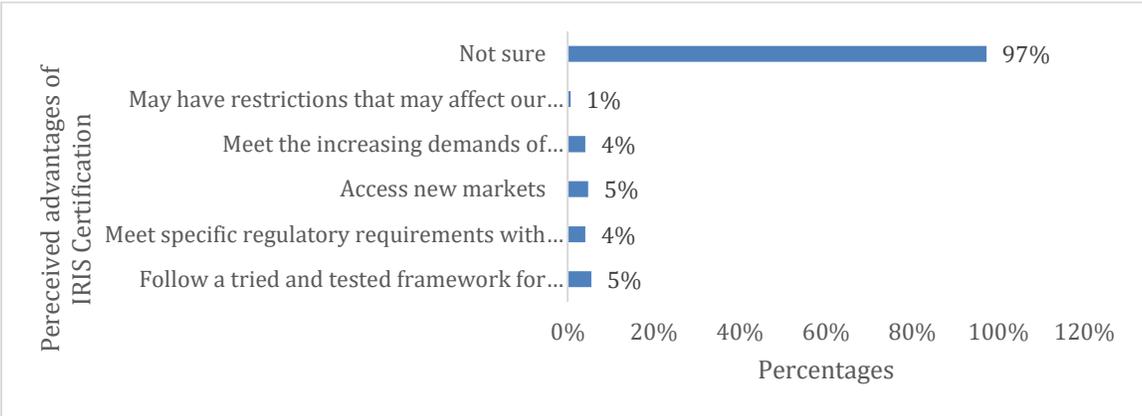
“Legislators have a big role to play in promoting safe, orderly and regular labour migration pathways for our migrant workers,” said IOM Uganda programme manager for Labour Migration and Human Development, Odette Bolly. “Because at the end of the day, these migrant workers come from the same MPs’ constituents. Labour migration itself is not new; but we need to make sure that recruitment of migrant workers is done ethically.”

During the training several MPs reported that many youths in their constituencies are asking for help to go migrate overseas for work. However, the rights of migrant workers remain a concern.

“We have fragmented laws and policies about migration. Because we do not have a comprehensive national migration policy, we have ended up abetting forms of migration that probably include human trafficking.”



FIGURE 20: PERCEIVED ADVANTAGES OF IRIS CERTIFICATION



Source: IOM Baseline Study, 2021

The majority of the PRAs (97%) are not sure of the perceived advantages of being IRIS certified. This calls for intentional sensitization for the project to be able to achieve its ultimate goal of successfully getting good representation of the PRAs satisfied. However, a five percent representation of the study subjects is no mean achievement to identify with benefits such IRIS certification enables them to follow a tried and tested framework for ensuring regular compliance, access to new markets, meet the increasing demand on the industry and meet specific regulatory requirements with confidence.

According to an International Organization for Migration 2021 publication on Global Policy Network on Recruitment IRIS, it takes a whole-of-government approach to promote ethical recruitment and protect migrant workers. This means facilitating dialogue within and between governments, between national and sub-national authorities and between governments and other relevant stakeholders, including the private sector and civil society. It also includes supporting the development and implementation of national action plans, road maps and bilateral arrangements on ethical recruitment, and the development of new labour migration and recruitment policies. IRIS also facilitates learning and cross-fertilization by convening global and regional conferences to share experiences, identify common challenges and disseminate good practices.



PERCEPTIONS AND KNOWLEDGE OF THE IRIS PRINCIPLES

This section explores the perceptions of PRAs on the International Recruitment Integrity System (IRIS) principles.

Table 10: PERCEIVED POSSIBILITY OF ADHERING TO THE ELEMENTS IN THE IRIS PRINCIPLES

	None Project Target	Project Targeted	None Project Target	Project Targeted	Index Value
Respect for Laws and Fundamental Principles at Work	32	34	98%	96%	97%
Respect for Ethical and Professional Conduct	80	51	94%	89%	91.5%
Prohibition of Recruitment Fees and Related Costs to Jobseekers	77	44	91%	97%	94%
Respect for Freedom of Movement	25	25	34.7%	44.5%	39.6%
Respect for Transparency of terms and conditions of employment	79	49	40%	48%	44%
Respect for Confidentiality and Data Protection	79	48	96%	96%	96%
Respect for access to remedy	75	43	90%	90%	90%

Source: IOM Baseline Study, 2021

Study respondents were asked for their perceptions on the possibility of Uganda as a country ability to adhere to all the elements in the seven IRIS principles. The highest level of confidence is in the Principle of respect for laws and fundamental principles at work conduct performing at 96% for trained PRAs and 98% for none trained PRAs. The least performance is registered on the principle for freedom of movement at 34.7% and 44.5% for none project and project targeted PRAs respectively followed by the principle of respect for transparency of terms and conditions for employment performing at 48% for trained PRAs and 40% for none trained PRAs.

Table 11: PERCEPTION OF PRAS ON THE RESPECT FOR LAWS AND FUNDAMENTAL PRINCIPLES AT WORK

	Project Target PRAs			None Project PRAs		
	Always	Seldom	Never	Always	Seldom	Never
Our agency complies with all applicable country and international laws governing the operation of externalization of labour	98%	2%	0%	100%	0%	0%
Our agency keeps recruitment license held in 'good standing'	95%	5%	0%	100%	0%	0%
As an agency we are able to comply with all the international laws on recruitment at all times	96%	4%	0%	100%	0%	0%
As an agency we have internal controls that are able that control for forced and/or child labor	96%	4%	0%	97%	2%	1%
Our agency is aware of freedom of Association (trade union members) in this trade	92%	4%	4%	95%	2%	3%
Our beneficiaries have access to equal treatment and non-discrimination based on the policies and systems we have in place	96%	4%	0%	99%	0%	1%
Index	96%	3.8%	0.7%	98%	1%	1%

Source: IOM Baseline Study, 2021

The overall perceived possibility to PRAs capability to adhere to the principle of respect for laws and fundamentals principle at work is at 96% and 98% for project targeted and none project targeted PRAs.



Table 12: PERCEPTIONS OF PRAS ON THE PRINCIPLE RESPECT FOR ETHICAL AND PROFESSIONAL CONDUCT

	Project Target PRAs				None Project PRAs			
	Always	Some times	Seldom	Never	Always	Some times	Seldom	Never
Policies, practices and procedures align with IRIS	86%	11%	2%	2%	94%	5%	0%	0%
Recruiter does due diligence “homework” on employer and all business partners	84%	13%	2%	2%	95%	3%	0%	0%
Management systems in place	94%	4%	0%	2%	98%	2%	0%	0%
Contractual relationships in place	87%	5%	7%	0%	90%	6%	5%	0%
Pro-active monitoring of employers and partners	95%	5%	0%	0%	93%	6%	1%	0%
Index	89%	8%	2%	1%	94%	4%	1%	0%

Source: IOM Baseline Study, 2021

The overall performance of the five indicators of the principle of respect for ethical and professional conduct is at 91.5% with the best performing indicators “management systems in place” performing at 94% among project targeted PRAs and 98% for none project targeted PRAs.



Table 13: PERCEPTION OF PRAS ON PROHIBITION OF RECRUITMENT FEES AND RELATED COSTS TO JOBSEEKERS PRINCIPLE

	Project Target PRAs				None Project PRAs			
	Alw ays	Some times	Seld om	Nev er	Alw ays	Some times	Seld om	Nev er
As an agency we are clear on fees and costs charging to all our beneficiaries	96%	4%	0%	0%	97%	2%	0%	0%
It's possible for us to operate in line with the Employer Pays Principle	89%	7%	2%	2%	93%	6%	0%	1%
We communicate to all potential migrant workers the related fees and costs before engagement	94%	6%	0%	0%	99%	0%	0%	1%
We would/ have trained all our staff on prohibition of recruitment fees and related costs to job seekers to avoid non- compliancy	91%	7%	2%	0%	99%	0%	0%	1%
As an agency we reflect the prohibition to recruitment fees and related costs to job seekers all service agreements	93%	4%	4%	0%	98%	0%	1%	1%
As an agency once trained we Pro-actively monitor the prohibition of recruitment fees and related costs to job seeks	87%	7%	2%	2%	94%	2%	2%	0%
Index	91%	6%	2%	1%	97%	2%	1%	1%

Source: IOM Baseline Study, 2021

91% for the project targeted PRAs and 97% of the none project targeted PRAs perceive that they could align to the principle of prohibition of recruitment fees and related costs to jobseekers with the best performing parameters as being able to communicate to all potential migrant workers the related fees and costs before engagement and training of all staff on the prohibition of the recruitment fees and related costs before engagement at 83% and 94% for project and none project targeted PRAs respectively. International sensitization on the IRIS principles and the related benefits should be provided to the PRAs and included within the monitoring framework of the Ministry of Gender Labour and Social Development.



Table 14 : PERCEPTION OF PRAS ON PRINCIPLE OF RESPECT FOR FREEDOM OF MOVEMENT

	Project Target PRAs				None Project Target PRAs			
	Always	Some times	Seldom	Never	Always	Some times	Seldom	Never
Workers using our services are allowed unrestricted access to their passports during recruitment and employment”	40.0%	54.5%	1.8%	3.6%	28.4%	64.8%	3.4%	3.4%
Workers’ bank books, money or deeds to property are NOT held by our agency under any circumstances	34.5%	0.0%	5.5%	47.3%	17.0%	3.4%	3.4%	64.8%
Workers recruited by our agency are not prevented from leaving their jobs under any circumstance	67.3%	21.8%	1.8%	7.3%	73.9%	12.5%	1.1%	6.8%
Workers recruited by our agency are allowed freedom of movement, including during free time	36.4%	49.1%	7.3%	7.3%	19.3%	65.9%	2.3%	5.7%
Index	44.5%	31.4%	4.1%	16.4%	34.7%	36.6%	2.6%	20.2%

Source: IOM Baseline Study, 2021

The study participants were assessed on perception on the principle of respect for freedom of movement and the performance project targeted/trained PRAs at an index of 44.5% and none project targeted PRAs at 34.7% reporting possibility of always respecting the principle of respect of freedom of movement. There is somewhat a variation in the performance of the measures between the two groups of PRAs and this could be attributable to the training of PRAs in the project targeted group justifying a mindset change for this group versus their untrained counterparts. On the overall PRAs fared much worse in this principle than the others. This is attributable to the fact that they have less control over the worker’s freedom of movement once they are abroad.



Table 15: PERCEPTION OF PRAS ON RESPECT FOR TRANSPARENCY OF TERMS AND CONDITIONS OF EMPLOYMENT PRINCIPLE

	Project Target PRAs				None Project PRAs			
	Always	Some times	Seldom	Never	Always	Some times	Seldom	Never
We provide a written agreement with all our workers and retain filed copies	41%	56%	4%	0%	29%	65%	3%	3%
We have service agreement all with employers and retain filed copies	46%	0%	6%	48%	28%	3%	3%	65%
Worker has an employment contract, which is in their language and has clear terms and conditions	69%	22%	2%	7%	78%	13%	1%	7%
It's possible to ensure no coercion or contract substitution with all our workers and employers	35%	50%	7%	7%	24%	66%	2%	6%
We provide pre-departure orientation training for workers	100%	0%	0%	0%	100%	0%	0%	0%
Index	48%	32%	5%	16%	40%	37%	3%	20%

Source: IOM Baseline Study, 2021

About 44 (48% project targeted PRAs and 40% none project targeted PRAs) can in their current capacity adhere to principle of respect for transparency of terms and conditions of employment. The PRA's understanding and adherence to the principle of respect for transparency of terms and conditions for employment is quite wanting by the performance of the different parameters classified within this principle that will warrant the attention of critical stakeholders to ensure safety of potential migrant workers from all forms of abuse that may be calibrated by the poor performance within the benchmarks of this particular principle. Several factors have the potential of inhibiting the adherence to this principle that include illiteracy rates among the migrant workers, limited control by the PRAs in the operations out



Table 16: RESPECT FOR CONFIDENTIALITY AND DATA PROTECTION

Respect for Confidentiality and Data Protection	Project Target PRAs				None Project PRAs			
	Always	Sometimes	Seldom	Never	Always	Sometimes	Seldom	Never
We have policies and procedures in place for handling personal information of workers	100%	0%	0%	0%	100%	0%	0%	0%
All the information we collect is relevant to the recruitment process	100%	0%	0%	0%	100%	0%	0%	0%
We have data sharing protocol in place that enables us only share on a 'need to know' basis	91%	6%	0%	3%	97%	0%	0%	3%
Our Staff are trained in data protection guidelines.	94%	0%	6%	0%	94%	2%	4%	0%
Index	96%	2%	2%	1%	96%	2%	2%	1%

Source: IOM Baseline Study, 2021

According to the table above the majority of the interviewed PRAs perceived that they are able to adhere to the IRIS principle of Respect for confidentiality and data protection (93%). It will require deliberate initiatives of the project to support the PRAs on aligning supporting documents and benchmarks for these measures as these were not easily verifiable beyond the respondent feedback. Intentional capacity building of the PRAs and their staff of this principle will improve the compliance to this principle beyond perception to practice across the industry. Specific standards should be created as a measure of respect for confidentiality and data protection through the Ministry of Gender Labour and Social Development and partnership with UAERA that protects personal information of the persons and as such increasing the security measures provided to the people that are served through this industry.

Table 17: RESPECT FOR ACCESS TO REMEDY

	Project Target PRAs				None Project PRAs			
	Always	Sometimes	Seldom	Never	Always	Sometimes	Seldom	Never
We have a grievance mechanism in place	94%	6%	0%	0%	94%	6%	0%	0%
There is possibility to refer workers to other mechanisms, especially during employment stage	77%	20%	3%	0%	77%	20%	3%	0%
Workers are aware of these grievance mechanisms	94%	6%	0%	0%	94%	6%	0%	0%
Staff are trained on grievance mechanism	90%	7%	0%	3%	90%	7%	0%	3%
Our agency monitors the wellbeing of workers	97%	3%	0%	0%	97%	3%	0%	0%
Index	90%	9%	1%	1%	90%	9%	1%	1%

Source: IOM Baseline Study, 2021

Ninety percent of the PRAs interviewed perceive that they could be able to always adhere to the principle of respect for access to remedy with 94% acknowledging the existence of a grievance management system in place and the agency ability to monitor the wellbeing of workers. However, it's worth noting that quite a number of workers may not be able to access the grievance management portals based on controls that may exist in the



homesteads where domestic workers may be in operation compared to the other classifications of labour that may be providing their services out of Uganda on the basis that the operational dynamics somewhat differ.

Table 18: ADVANTAGES OF USING GRIEVANCE MANAGEMENT SYSTEMS

- The employees would access psychosocial support (counselling services)
- There would be an opportunity for them to change and do something else
- It helps having records in place in case of any thing
- Promotion of migration, remittances come from migration and workers are willing to go as they have redress for their issues
- It will reduce the issues of trafficking many migrants now days tend to devise their own means of traveling hence made end up being exploited and abused
- The employees would access psychosocial support (counselling services)
- There would be an opportunity for them to change and do something else
- Grievance system is good for follow-up especially by the family members of the migrant workers
- Job seekers are able to report what’s happening to their people
- Promotion of migration, remittances come from migration and workers are willing to go as they have redress for their issues
- It will reduce the issues of trafficking many migrants nowadays tend to devise their own means of traveling hence made end up being exploited and abused
- There should be a way that system can track the channels of migration
- If the grievance system is in place, there would be records of the number of people in a given country

Source: Key Informant Interview responses, IOM Baseline 2021

Table 19: WHAT WOULD MAKE IT EASY TO USE GRIEVANCE MANAGEMENT SYSTEMS

- If involved in the grievance management system procedure, which is used by the Ministry of Gender Labor and social development is in English which makes it hard for most of the workers to interpret it so they may not be able to use it.
- If the system could adapt to several languages appreciating the limitation in use of English by the desired users of the system.
- Awareness creation among the migrant workers (mindset change)
- If migrant workers and their families should be involved in the grievance management system
- If Migrant workers voice is supported to enable tell their voice
- If the government could increase on the human capital that can support in telling the story rather than limiting this to media platforms.
- The officials of ILO should also be part of the management of the institutes to come up with a voice to support workers.
- A central body such as UAERA with the support of government would support the management of the data on the systems. Recruiters are the ones managing the grievance management system, which brings conflict of interest. They cannot solve issues relating to their misbehaving.
- The grievance management should be in the contract as a close embedded in the contract of the employee,
- The grievance handling should be through whistle blowing.
- Workers may not be able access the grievance management system. PRAs are profit making, so they can’t really manage the grievance management system. The recruiter cannot be responsible for the



grievance management system; they cannot be accountable for their own acts. There must be intentional inclusion of the workers in the grievance management system which is not the case

- Equal knowledge about the grievance management system, anyone who becomes a trainer it should be real people who have gone through the system not, any person handpicked to train the migrant workers
- The training centers are also owned by the PRAs themselves, so how do we prevent the influence. The migrant workers don't receive the real training.
- Need the involvement of the migrant worker's association to be in charge for the workers
- Continued awareness sensitization of the public and sharing of relevant information on safe migration and identification of victims of trafficking.
- Enhanced training and capacity support of stakeholder action agencies on effective application of the Prevention of Trafficking in Persons Act in order to enhance their respective capacities to be able to prevent the trafficking; identify and protect the victims and prosecute the perpetrators of the trafficking more effectively
- Deliberate multi agency coordinated operations against irregular recruitment agents as a way of prevention of the trafficking.
- Increased interceptions of actual and potential victims at the exit/entry points as another measure to protect victims and prevent the trafficking.
- Further improvement of the legal and policy frameworks by concluding the development of the Regulations for the PTIP Act and carrying out negotiations for establishment of Bilateral Labour Agreements with more targeted foreign countries.
- Keeness by the community to report incidents of suspected irregular recruitment and human trafficking as a result of continued awareness of the trend of the trafficking.
- Timely follow up of registered reports of suspected incidents of trafficking in persons by the more conscious Police Officers.
- Better organized and coordinated ways of rescuing victims from abroad and providing them with the required temporary assistance.

Source: Key Informant Interview responses, IOM Baseline 2021

LIMITATIONS AND CHALLENGES FACED WITHIN THE SECTOR

This section presents the findings of challenges faced within the labour externalization sector. This is based on the qualitative assessment and document review.

Insufficient training time; insufficient training time allocated to the potential migrant workers versus the large training curriculum as such compromised quality of training provided.

Lack of translated training materials; despite the fact that potential migrant workers arrive from the different parts of Uganda with the largest number profiling with a limited command of the English language. The trainings are delivered in English and where translation is to be done can only be provided in Luganda which is the proxy and language for the trainers.

Lack of budget for the MoGLSD to provide efficient support supervision; to the PRAs as would be required

Limited support provided to PRAs when dealing to with challenges such as confiscation of travel documents of potential migrant workers by Interpol.

Existence of a framework agreement with only one country that compromises the safety of the workers that are sent out.



The inconsistencies in the leadership structure within the PRAs. The ownership of multiple agencies by single individuals.

Lack of/inconsistent deliberate structured engagements between the MoGLSD and PRAs.

Falsification of documents by the potential migrant workers that alter the ages, academic qualification and often providing wrong phone contacts and recommendations from their families authenticating their legitimacy to leave the country in such of employment.

The limited understanding of the operation of District Labor Officers (DLO) on the operations of PRAs in Uganda.

Capacities of staff in PRA to handle proper documentation is also inadequate, which affects training institutes in report writing

Level of education for most of the potential migrant workers especially domestic workers is very low with some, not having completed middle primary level, this makes training language complex to agree on as their command of English is desirable.

The training of prospect workers is considered very expensive and many perceive the content given to Domestic workers to be content that can be learnt on job without tasking its requirement for workers to be externalize out of the country.

CONCLUSIONS AND LESSONS LEARNED

While there are attempts to manage the trafficking of persons in place that include; (i) Demand for clearance by the Ministry of Education and sports in collaboration with the Ministry of Internal Affairs for travel of school children to foreign countries, especially during school days, before permission for their exit is granted by the Immigration. (ii) Demand for clearance letters by the Ministry of Gender, Labour & Social Development for Ugandan migrant workers who get foreign jobs through their individual initiatives before they are allowed to exit by Immigration. Condition for elaborate clearance by the Ministry of Gender, Labour & Social Development, in collaboration with Ministry of Internal Affairs, before children are granted exit permission by the Immigration.

The lack of a clear national Policy and Referral Mechanism on protection and provision of assistance to victims of trafficking that compromises the effective implementation of “Respect for access to remedy”, the PRAs have continued to apply the existing adhoc coordinated system to rescue, protect and assist victims of the trafficking. The bystanders have been encouraged to report through the coordination Office.

PRAs deal with challenges that include not knowing the integrity of their partners in the receiving countries, lack of control over the ethical mandate of their business partners lack of bilateral labor agreements in some countries and as such PRAs encounter lot of lost in managing the processes. With these challenges in place according to a Key Informant at the Ministry of Gender Labour and Social Development has resulted into the PRAs forgetting their industry is a very complex one whose product is human beings with feelings and yet managed like any other commodity product. This has undermined the human rights side of operation.

On the overall, data shows quiet significant representation of good will and willingness by PRAs to try adhering to the IRIS principles by the 149 PRAs inclusive of the none project targeted PRAs that have not yet received any training on IRIS. None of the IRIS principles scored below average implying with intentionally popularization of IRIS through government structures, strengthening capacities of government officials and PRAs, creating standard thresholds for performance with protection of humans as the core Uganda is able to embrace IRIS.



RECOMMENDATION

Recommendation to Government and Partners.

- ❖ The MoGLSD should explore the possibility to sign additional bilateral labour migration agreements with countries receiving Ugandan workers.
- ❖ There is need to push for workers' retention within the country by strengthen the labor industry in Uganda
- ❖ Need for the MoGLSD and stakeholders to set up a structured engagement with PRAs that will be deliberate on processes and quality of standard operation for the sector. This platform can also be used to address emerging issues within the industry appreciating the complexity that the product traded in this sector are human beings.
- ❖ There is need to review training content that is delivered for to potential migrant workers in just a week. The MoGLSD and other stakeholders could review.
- ❖ According to the 2019 TiP report, the processes of reviewing the Regulations for externalization of Ugandan migrant workers and developing National Referral Guidelines on TIP Issues were about to be concluded. This is a product that needs to be fast-tracked to be able to support the MGLSD effectively align to the PRAs to the implementation fidelity and alignment to the IRIS standards.
- ❖ It is important for the government to set up clear monitoring systems for monitoring compliance and adherence to the set guidelines by conducting continuous sensitization, conducting routine standardized reflection meetings with the PRAs to help them appreciate the challenges and provide room for participatory involvement of PRAs in addressing the concern of trafficking of persons.
- ❖ A quality assurance mandate to standardized pre-departure training needs to be defined to be able to address the flaws within the training delivery
- ❖ Continued advocacy and popularization for IRIS certification

Recommendation to the IOM

- ❖ There is need to have training materials translated into several local languages that the potential migrant workers can relate with. This can facilitate their understanding of the delivered training content
- ❖ There is need to review the safety precautions in a single individual owning more than one PRA
- ❖ The is need for a qualitative inquiry to include the discussions with returnees to provide a deep dive into the experiences such as the quality of pre-departure trainings, their engagements with PRAs and business partner agencies, their experiences with their employers
- ❖ The project need to continuously engage and popularize IRIS certification benefits to both MoGLSD, UAERA and PRAs that will give a high potential for improving the operations of labour externalization in Uganda
- ❖ The least performance is registered on the principle for freedom of movement at 34.7% and 44.5% for none project and project targeted PRAs respectively followed by the principle of respect for transparency of terms and conditions for employment performing at 48% for trained PRAs and 40% for none trained PRAs. As such there is need to set up a standard for engagements with sister agencies in countries of PRAs in



	<ul style="list-style-type: none"> E. South East Asia and the Pacific F. Sub Saharan Africa G. Central and Western Asia H. Eastern Europe I. Others (Specify).....
A10b. Which countries do you have business partner agencies?	
A11: Do you have binding agreements with the business partner agencies in these countries	<ul style="list-style-type: none"> 1. Yes 2. No
A12: How often are these agreements reviewed	<ul style="list-style-type: none"> A. Never B. Annually C. After 5years D. Based on need E. Others (specify).....
A13: Are opportunity verification checks conducted in countries of labor destination prior to identifying potential labour	<ul style="list-style-type: none"> 1. Yes 2. No
A14: What categories of workers do you deploy out the countries above? (Tick ALL that apply) Multiple response	<ul style="list-style-type: none"> A. Domestic workers B. Security personnel C. Hotel staff D. Others (Specify).....
A15: Which kind of expenses do you cover during the recruitment process? (Tick ALL that apply) Multiple response	<ul style="list-style-type: none"> A. Medical costs B. Insurance costs C. Administrative costs D. Travel and lodging costs E. Equipment costs F. Training and Orientation G. Skills and Qualification H. Initial Interview costs I. Documentation and travel costs J. Replacement of lost document costs K. Early leave/return costs L. Transport to/from workplace M. Accommodation N. Others (specify)
A16: Which expenses does the job seeker cover during the recruitment process (Tick ALL that apply) Multiple response.	<ul style="list-style-type: none"> A. Medical costs B. Insurance costs C. Administrative costs D. Travel and lodging costs E. Equipment costs F. Training and Orientation G. Skills and Qualification H. Initial Interview costs I. Documentation and travel costs J. Replacement of lost document costs K. Early leave/return costs L. Transport to/from workplace M. Accommodation N. Others (specify)



<p>A17: Which kind of costs does the employer cover during the recruitment process (Tick ALL that apply) Multiple response</p>	<ul style="list-style-type: none"> A. Medical costs B. Insurance costs C. Administrative costs D. Travel and lodging costs E. Equipment costs F. Training and Orientation G. Skills and Qualification H. Initial Interview costs I. Documentation and travel costs J. Replacement of lost document costs K. Early leave/return costs L. Transport to/from workplace M. Accommodation N. Others (specify) 																								
<p>A18: Recruitment History for the last 5years</p>	<table border="1"> <thead> <tr> <th>YEAR</th> <th>Male</th> <th>Female</th> <th>Total</th> </tr> </thead> <tbody> <tr> <td>2016</td> <td></td> <td></td> <td></td> </tr> <tr> <td>2017</td> <td></td> <td></td> <td></td> </tr> <tr> <td>2018</td> <td></td> <td></td> <td></td> </tr> <tr> <td>2019</td> <td></td> <td></td> <td></td> </tr> <tr> <td>2020</td> <td></td> <td></td> <td></td> </tr> </tbody> </table>	YEAR	Male	Female	Total	2016				2017				2018				2019				2020			
YEAR	Male	Female	Total																						
2016																									
2017																									
2018																									
2019																									
2020																									
<p>A19: What kind of challenges do you face dealing with the job seekers? (Tick ALL that apply) Multiple response</p>	<ul style="list-style-type: none"> A. Language barrier B. Illiteracy among the job seekers C. Falsification of document/ Inconsistency in documentation D. Lack of trust E. Others (specify)..... 																								
<p>A20: What kind of challenges do you face dealing with employers (Tick ALL that apply) Multiple response</p>	<ul style="list-style-type: none"> A. Dishonesty B. Discrimination C. Delay in payment of fees D. Others (specify)..... 																								
<p>A21: What challenges do Migrant workers face in their places of employment</p>	<ul style="list-style-type: none"> A. Sexual assault & harassment B. Physical assault C. Denial of wages D. Lack of benefits such as pension E. Discrimination due to cultural differences F. Denial of education for their children G. Child labour H. Poor housing I. Segregation due to cultural diversity J. Denial of health care K. Confiscation of passports/travel documents L. Others (Specify)..... 																								
<p>A22: What challenges do employers face with the laborers?</p>	<ul style="list-style-type: none"> A. Language barrier B. Illiteracy among the job seekers C. Falsification of document/ Inconsistency in documentation D. Lack of trust E. Others (Specify)..... 																								



	E.Independent support from a global leader in testing, inspection and compliance with global accreditation for IRIS certification F.Others (Specify).....
A30: What are the (perceived) disadvantages of being IRIS certified as an international recruitment agencies	A.Limit our engagement with recruiters in countries of destination B.May have restrictions that may affect our revenue returns C.Other(specify).....
A31: How often do you engage with the MGLSD?	E. Only during registration F. At least annually G. On a need basis H. Never I. On request by UAERA A. Others (specify).....
A30: How often do you engage with UAERA?	1. Never 2. Less frequently 3. More frequently 4. Others (specify).....
A31. What effects did the COVID-19 pandemic have on your business? (Tick ALL that apply) Multiple response	A. Reduction in revenue B. Increased our operation costs C. Lost clients D. Reduction in number job seekers E. Others (specify).....
A32: What is your mitigation plan given the uncertainty of the pandemic	A. Diversity to alternative recruitments especially online service industry that enables working from home B. Amalgamate with other agencies C. Others (specify).....
A33: Do you participate in UAERA annual meetings?	1. Yes 2. No
A34: Do you have a monitoring framework of labour migrants being externalized in the countries of destination?	A. Yes (Go to A35) B. No B. Not sure
A35: If yes, How do you ensure wellbeing of the migrants workers as well as their access to grievance mechanism in case of distress	

SECTION B: PERCEPTIONS AND KNOWLEDGE OF THE IRIS PRINCIPLES

PRINCIPLE A: RESPECT FOR LAWS AND FUNDAMENTAL PRINCIPLES AT WORK: Now I am going to read to you statements that relate with a principle of respect for laws and fundamental principles at work. You will share with me your opinion on applicability of the elements within this principle. You will choose between these 5 choices from your understanding and practice of the statement herein.					
	Always	Often	Sometime s	Seldom	Never
PA1: Our agency complies with all applicable country and international					



laws governing the operation of externalization of labour					
PA2: Our agency keeps recruitment license held in 'good standing'					
PA3: As an agency we are able to comply with all the international laws on recruitment at all times					
PA4: As an agency we have internal controls that are able that control for forced and/or child labor					
PA5: Our agency is aware of freedom of Association (trade union members) in this trade					
PA6: <input type="radio"/> Our beneficiaries have access to equal treatment and non-discrimination based on the policies and systems we have in place					
PA7: As PRAs in Uganda, do you think its viable to adhere to all the elements within this principle based on your experience and the current operational environment, if yes, tell me how?	A. Yes B. No. If A>>>>Go to PA7a If B>>>>Go to PA7b				
PA7 a: If yes ,tell me how					
PA7 b: If no, why?					
PA8: How do you think we can strengthen adherence to this principle in Uganda					
PRINCIPLE B: RESPECT FOR ETHICAL AND PROFESSIONAL CONDUCT: Now I am going to read to you statements that relate with a principle of respect for ethical and professional conduct. You will share with me your opinion on applicability of the elements within this principle. You will choose between these 5 choices from your understanding and practice of the statement herein.					
	Always	Often	Sometime s	Seldom	Never
PB1: Policies, practices and procedures align with IRIS					
PB2: Recruiter does due diligence "homework" on employer and all business partners					
PB3: Management systems in place					
PB4: Contractual relationships in place					
PB5: Pro-active monitoring of employers and partners					
PB6: As PRAs in Uganda, do you think its viable to adhere to all the elements within this principle based on your experience and the current	A.Yes B.No. If A>>>>Go to PB6a If B>>>>Go to PB6b				



operational environment, if yes, tell me how?					
PB6 a: If yes ,tell me how					
PB6 b: If no, why?					
PB7: How do you think we can strengthen adherence to this principle in Uganda					
PRINCIPLE 1: PROHIBITION OF RECRUITMENT FEES AND RELATED COSTS TO JOBSEEKERS: Now I am going to read to you statements that relate with a principle of prohibition of recruitment fees and related costs to job seekers. You will share with me your opinion on applicability of the elements within this principle. You will choose between these 5 choices from your understanding and practice of the statement herein.					
	Always	Often	Sometimes	Seldom	Never
PI.1: As an agency we are clear on fees and costs charging to all our beneficiaries					
PI.2: Its possible for us to operate in line with the Employer Pays Principle					
PI.3: We communicate to all prospective workers the related fees and costs before engagement					
PI.4: We would/ have trained all our staff on prohibition of recruitment fees and related costs to job seekers to avoid non- compliancy					
PI.5: As an agency we reflect the prohibition to recruitment fees and related costs to job seekers all service agreements					
PI.6: As an agency once trained we Pro-actively monitor the prohibition of recruitment fees and related costs to job seeks					
PI.7: As PRAs in Uganda, do you think its viable to adhere to all the elements within this principle based on your experience and the current operational environment, if yes, tell me how?	A.Yes B.No. If A>>>>Go to PI.7a If B>>>>Go to PI.7b				
PI.7 a: If yes ,tell me how					
PI.7 b: If no, why?					
PI.8: How do you think we can strengthen adherence to this principle in Uganda					
PRINCIPLE 2: RESPECT FOR FREEDOM OF MOVEMENT: Now I am going to read to you statements that relate with a principle of respect for access to remedy. You will share with me your opinion on applicability of the elements within this principle. You will choose between these 5 choices from your understanding and practice of the statement herein.					



	Always	Often	Sometimes	Seldom	Never
P2.1: “Workers using our services are allowed unrestricted access to their passports during recruitment and employment”					
P2.2: Workers’ bank books, money or deeds to property are NOT held by our agency under any circumstances					
P2.3: Workers recruited by our agency are not prevented from leaving their jobs under any circumstance					
P2.4: Workers recruited by our agency are allowed freedom of movement, including during free time					
P2.5: As PRAs in Uganda, do you think its viable to adhere to all the elements within this principle based on your experience and the current operational environment, if yes, tell me how?	A.Yes B.No. If A>>>>Go to P2.5a If B>>>>Go to P2.5b				
P2.5 a: If yes ,tell me how					
P2.5 b: If no, why?					
P2.6: How do you think we can strengthen adherence to this principle in Uganda					
PRINCIPLE 3: RESPECT FOR TRANSPARENCY OF TERMS AND CONDITIONS OF EMPLOYMENT: Now I am going to read to you statements that relate with a principle of respect for transparency of terms and conditions of employment. You will share with me your opinion on applicability of the elements within this principle. You will choose between these 5 choices from your understanding and practice of the statement herein.					
	Always	Often	Sometimes	Seldom	Never
P3.1: We provide a written agreement with all our workers and retain filed copies					
P3.2: We have service agreement all with employers and retain filed copies					
P3.3: Worker has an employment contract, which is in their language and has clear terms and conditions					
P3.4: It’s possible to ensure no coercion or contract substitution with all our workers and employers					
P3.5 We provide pre-departure orientation training for workers					



P3.6: As PRAs in Uganda, do you think its viable to adhere to all the elements within this principle based on your experience and the current operational environment, if yes, tell me how?	A.Yes B.No. If A>>>>Go to P3.6a If B>>>>Go to P3.6b				
P3.6 a: If yes ,tell me how					
P3.6b: If no, why?					
P3.7: How do you think we can strengthen adherence to this principle in Uganda					
PRINCIPLE 4: RESPECT FOR CONFIDENTIALITY AND DATA PROTECTION: Now I am going to read to you statements that relate with a principle of respect for confidentiality and data protection. You will share with me your opinion on applicability of the elements within this principle. You will choose between these 5 choices from your understanding and practice of the statement herein.					
	Always	Often	Sometime s	Seldom	Never
P4.1: We have policies and procedures in place for handling personal information of workers					
P4.2: All the information we collect is relevant to the recruitment process					
P4.3: We have data sharing protocol in place that enables us only share on a 'need to know' basis					
P4.4: Our Staff are trained in data protection guidelines.					
P4.5: All data on employers and workers is stored in a secure place					
P4.5: As PRAs in Uganda, do you think its viable to adhere to all the elements within this principle based on your experience and the current operational environment, if yes, tell me how?	A.Yes B.No. If A>>>>Go to P4.6a If B>>>>Go to P4.6b				
P4.6 a: If yes ,tell me how					
P4.6b: If no, why?					
P4.7: How do you think we can strengthen adherence to this principle in Uganda					
PRINCIPLE 5: RESPECT FOR ACCESS TO REMEDY: Now I am going to read to you statements that relate with a principle of respect for access to remedy. You will share with me your opinion on applicability of the elements within this principle. You will choose between these 5 choices from your understanding and practice of the statement herein.					
	Always	Often	Sometime s	Seldom	Never



P5.1: We have a grievance mechanism in place					
P5.2: There is possibility to refer workers to other mechanisms, especially during employment stage					
P5.3: Workers are aware of these grievance mechanisms					
P5.4: Staff are trained on grievance mechanism					
P5.5: Our agency monitors the wellbeing of workers					
P5.6: As PRAs in Uganda, do you think its viable to adhere to all the elements within this principle based on your experience and the current operational environment, if yes, tell me how?	A.Yes B.No. If A>>>>Go to P5.6a If B>>>>Go to P5.6b				
P5.6 a: If yes ,tell me how					
P5.6 b: If no, why?					
P5.7: How do you think we can strengthen adherence to this principle in Uganda					



documents need for travel	Yes	Not sure/Don't Remember	No
What to know about the destination country's laws?	Yes	Not sure/Don't Remember	No
employers and workers' responsibilities	Yes	Not sure/Don't Remember	No
wages, costs and salary deductions	Yes	Not sure/Don't Remember	No
benefits and challenges of working abroad	Yes	Not sure/Don't Remember	No
Right and obligation of migrant workers	Yes	Not sure/Don't Remember	No
labour rights violations some migrant workers might face	Yes	Not sure/Don't Remember	No
What is labour exploitation and forced labour?	Yes	Not sure/Don't Remember	No
Looking at your Health	Yes	Not sure/Don't Remember	No
Be a smart spender	Yes	Not sure/Don't Remember	No
Managing your money	Yes	Not sure/Don't Remember	No

3. From the parameters below, assess the relevance of getting orientation on these prior to departure to the countries of destination.

Orientation Item	Rating				
	Very Relevant	Relevant	Not sure	Irrelevant	Very Irrelevant
basic information about destination country					
cultural traits of destination country					
communication with employer					
documents need for travel					
Grievance management system					
What to know about the destination country's laws?					
employers and workers' responsibilities					
wages, costs and salary deductions					
benefits and challenges of working abroad					
Right and obligation of migrant workers					
labour rights violations some migrant workers might face					
what is labour exploitation and forced labour?					
Looking at your Health					
Be a smart spender					
Managing your money					

4. What kind of challenges do you think Private Recruitment Agencies deal with in this kind of business?
5. How likely are the job seekers able to remember to use the grievance management system?
6. What are some of the critical factors that need to be addressed to enable Uganda authority administer/implement policies and regulations that promote ethical recruitment.
7. What are some of the challenges you encountered with the labour migrants during and after they have received the pre-departure training? How are you addressing these challenges you have just mentioned?



9. How likely are the job seekers able to remember to use the grievance management system?
10. Are there any laws or rules in place that you know of that made it more likely that you [use the grievance management systems]?
11. What is the Ministry planning to role out the implementation of the National action plan on ethical recruitment, what challenges do you anticipate and how do you plan to address those challenges as a MGLSD?
12. How are the bilateral agreement (BLA) sign with the countries of destination receiving labor migrants being monitored and implemented? what challenges have been face and how was it addressed?
13. What is your view on how the BLA is contributing to ethical recruitment of migrants, what gaps do you see in this BLA and what id the MGLSD doing to address these gaps you have identified?
14. Do MGLSD, District Local Government and PRA stakeholders have the necessary access, human resources and equipment to conduct data gathering and monitoring on ethical recruitment?
15. Is this adequately supported by MGLSD/PRA's Ethical recruitment frameworks and financial allocations
16. What are some of the critical factors that need to be addressed to enable Uganda authority administer/implement policies and regulations that promote ethical recruitment.
17. What parameters are considered during inspection of PRAs by government? In your rating how compliant are the PRAs in Uganda to the set standard by the government
18. How proactively does Uganda government investigate and punish labor recruiters who fraudulently recruit Ugandans
19. Is there processes/systems at Government and sub-county lower local government level that allow to identify (without stigmatization or other protection risks) individuals, families and social segments that are most at risk of undergoing un-ethical recruitment?"
20. To what extend is the current regulations and programme support and promote alternative and safe recruitment channels to migrant workers both at National and District Local Government units
21. In your opinion, do you think it's appropriate to eliminate all worker-paid recruitment fees, if yes why?



9. What measures can be undertaken by government to control for trafficking of persons under labour externalization auspices?
10. What are some of the critical factors that need to be addressed to enable Uganda authority administer/implement policies and regulations that promote ethical recruitment.
11. Are there process/systems at Government and sub-county lower local government level that allow to identify (without stigmatization or other protection risks) individuals, families and social segments that are most at risk of undergoing un-ethical recruitment?"
12. To what extend is the current regulations and programme support and promote alternative and safe recruitment channels to migrant workers both at National and District Local Government units



10. Are there any laws or rules in place that you know of that made it more likely that you [use the grievance management systems]?
11. Tell me some of the relevant PRAs structures and systems your company normally use to ensure appropriate ethical recruitment process;
12. What gaps exist in the current policy framework when implementation and sharing knowledge on Ethical recruitment process to facilitate access to remedy, mitigate TiP and labor exploitation risks
13. If gaps exist, what should be done to improved policies, due diligence and ethical recruitment monitoring and regulations?
14. What alternative do you think is more appropriate to provide alternative and safe recruitment channels to migrant workers to sustains ethical recruitment practices
15. How do you think COVID-19 affected this trade? Why do you say so?
16. What makes it easy/would make it easy for PRA in countries of destination to [use the grievance management systems]?
17. What role is UAERA playing to monitor migrant workers in countries of destination; what challenges have you face in this and how have UAERA addressed it.
18. How have UAERA created business network with PRA agencies in countries of destination,
19. Do you have any legal binding MOU/agreement with PRA in countries of destination, if yes, how has this been tracked and monitored to ensure compliance to ethical recruitment standards? Any challenges, if yes, how as it been addressed.



13. What are the correct/relevant PRAs/Government structures and systems that need to be strengthened to improve PRA;
14. What is required and what gaps exist for appropriate stakeholders' engagement on policy framework implementation and sharing knowledge on Ethical recruitment process to facilitate access to remedy, mitigate TiP and labor exploitation risks through improved policies, due diligence and recruitment?
15. What do Private recruitment agencies believe prevents them from successful implementation of ethical recruitment and the IRIS Standard?
16. How will the training gained enable them to sustainably implement ethical recruitment practices on a large scale? What do they feel will prevent/help their likelihood of success?"
17. How Strengthening the capacity of Ugandan recruitment agencies to provide alternative and safe recruitment channels to migrant workers can leads to PRAs sustains ethical recruitment practices

Thank you for your participation.

