



# ► Policy Brief

## Registration, Licensing, and Inspection of Private Recruitment Agencies for Uganda, Kenya, and Ethiopia

### ► Background

This research brief outlines key findings and recommendations for Better Regional Migration Management (BRMM) stakeholders to strengthen registration, licensing, and inspection mechanisms of private recruitment agencies in the East and Horn of Africa. Drawing on three in-depth labour migration corridor studies – namely, Ugandan domestic workers in Saudi Arabia, Kenyan migrants in Somalia’s education sector, and Ethiopian hospitality employees in South Sudan – the brief identifies critical themes across labour migration corridors.

To gain a comprehensive understanding, readers are encouraged to consult the brief in conjunction with the corresponding corridor studies.

The research questions of the corridor studies were:

1. **What is the stakeholder engagement process throughout a migrant’s journey, and how does it differ by gender where relevant?**
2. **What stakeholders and stakeholder interactions present critical risks, challenges, and opportunities throughout the migrant journey?**

3. **What are employer perspectives on the stakeholder risk and opportunity analysis?**
4. **What lessons and recommendations can be drawn for Employers’ Business Membership Organizations (EBMOs) to address critical risks and opportunities at national and regional levels, focusing on employer services and policy advocacy?**

For this study, researchers interviewed stakeholders from EBMOs, government officials, private recruitment agencies, and employers of migrant workers.

Data analysis employed a matrix approach, a well-established method for organizing and analyzing qualitative data. The research team regularly reviewed, synthesized, and analyzed the data using Microsoft Excel spreadsheets. This enabled the condensation, filtering, and aggregation of narrative data to identify patterns, trends, and outliers relevant to the research questions and corridor under study. This process allowed for triangulation of findings by examining the same issues through different stakeholder perspectives.

## ► Key Findings

The following key findings emerged from the corridor studies:

1

**Private recruitment agencies face significant constraints as the time required for advertising, passport and work permit processing, mandatory skills training, and migrant transportation often exceeds client deadlines, eroding profit margins.**

In Uganda, private recruitment agencies struggle with extended registration processes, mandated by the government, which prolong the recruitment cycle beyond client timeframe allocations, resulting in lost contracts and diminished revenue. In Somalia, despite limited engagement in the education sector, private recruitment agencies possess untapped expertise in supporting migrant workers and employers with registration, licensing, documentation, and negotiating salary and workplace standards.

2

**Government revocation of licenses renders recruitment agencies unable to perform crucial labour monitoring functions for contracted workers in destination countries.**

In Uganda, the government has delegated migrant monitoring and inspection responsibilities to private recruitment agencies. However, these agencies face significant constraints due to inadequate resources and limited authority, hindering their capacity to effectively oversee the conditions of Ugandan migrants in Saudi Arabia. In Somalia, the Ministry of Labour and Social Affairs' suspension of registration and licensing processes in 2020 has severely impacted recruitment agency operations. As a result, essential services have been reduced, including collaboration with employers to establish worker qualification criteria, thorough applicant screening involving background checks, and vital migrant support services such as assistance with tax documents and insurance policies. These constraints underscore the need for effective collaboration between governments and recruitment agencies to ensure the protection and well-being of migrant workers.

3

**In the absence of recruitment agencies, employers in Somalia and South Sudan leverage professional, social, and family networks to facilitate inward regular migration, enabling them to identify and employ migrant workers.**

In Somalia and South Sudan, employers facilitate regular migration by leveraging professional, social, and family networks to identify, recruit, and employ migrant workers, as recruitment agencies are absent. Specifically, in South Sudan, hospitality sector employers and informal intermediaries facilitate the irregular movement and employment of Ethiopian migrant workers. In contrast, employers in Somalia assist Kenyan migrant workers in obtaining visas and work permits and arranging their travel to employment destinations. However, this corridor still faces significant challenges, as intermediaries lack effective mechanisms to monitor labour conditions and establish reliable communication channels for migrant workers to report labour complaints and access remedies for grievances. Meanwhile, in Uganda, a growing perception among potential migrant workers is that the legal labour migration pathways yield diminishing returns, prompting more Ugandans to seek informal channels that facilitate movement to destination countries.

## ► Recommendations

This section provides timebound recommendations for EBMOs.

| # | Recommendation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
|---|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1 | Examine and amend existing legislation to ensure effective management of recruitment cycle issues and complexities, including: <ul style="list-style-type: none"> <li>1. clear roles and responsibilities;</li> <li>2. efficient government registration and licensing procedures;</li> <li>3. adequate financing that enables recruitment agencies to conduct labour monitoring; and</li> <li>4. Effective complaints and remedy procedures, administered on behalf of governments.</li> </ul> |
| 2 | Establish or support effective grievance mechanisms, ensuring workers can report issues or violations encountered during recruitment or employment abroad. Ensure these mechanisms are: <ul style="list-style-type: none"> <li>5. sufficiently resourced;</li> <li>6. accessible to all workers; and</li> <li>7. capable of providing timely resolutions.</li> </ul>                                                                                                                            |
| 3 | Enhance inter-ministerial coordination to streamline the registration and licensing process for recruitment agencies and migrant workers, thereby reducing timeframe and increasing efficiency.                                                                                                                                                                                                                                                                                                 |
| 4 | Conduct in-depth research to map the recruitment agency landscape in East and Horn of Africa countries, focusing on the quality of registration, licensing, and inspection mechanisms. Field visits can supplement data collection, overcoming virtual barriers and providing valuable insights into: <ul style="list-style-type: none"> <li>8. operations of private recruitment agencies; and</li> <li>9. experiences of migrant workers.</li> </ul>                                          |
| 5 | Enhance EMBO's efforts to engage private recruitment agencies in membership by boosting policy visibility on sector-specific concerns and establishing dedicated fora for companies to address national and regional issues.                                                                                                                                                                                                                                                                    |
| 6 | Develop specific mechanisms to foster greater dialogue and cooperation among national representative bodies of private recruitment agencies across the region, facilitated by EBMOs.                                                                                                                                                                                                                                                                                                            |