

EXISTING WORKFORCE NUTRITION POLICIES IN UGANDA AND OPPORTUNITIES FOR IMPROVEMENT



MARCH 2023

Annewies Hilberink, Sangeeta Mansharamani, Anuja Kastia, Christina Nyhus Dhillon, Marijke Hummel, Enock Musinguzi

KEY MESSAGES

- People spend 1/3 of their adult lives at work. By leveraging the workplace as a connector to people, we can bring access to and knowledge about healthy nutrition to millions of people around the globe through **workforce nutrition**.
- Major opportunities to further refine and expand workforce nutrition policies in Uganda include **mandating and setting minimal nutritional standards** for food provisioning at or near the workplace, expanding **maternity entitlements** to align with international standards and **incentivising employers to act on available policy guidelines** for healthy eating and for breastfeeding friendly workplaces.
- With supportive national policies, as well as accompanying minimal **accountability** and **compliance mechanisms**, in place even greater impact can be achieved.

SETTING THE SCENE

Malnutrition in all its forms, from undernutrition to micronutrient deficiencies and overnutrition, is a global public health burden. It is estimated that 2 in 3 women of reproductive age are affected by nutrient deficiencies¹. Uganda is a low-income country in which 41% of the population lives below the poverty line², and where about 82% of the population cannot afford a healthy diet³. There is a continued need to engage all actors and options to address the malnutrition burden the world faces. On average, people spend one-third of their adult lives at work, whether formal or informal; therefore, the workplace offers an important opportunity to increase access to and knowledge about healthy nutrition. Workforce nutrition is an opportunity to deliver proven benefits for employers, workers, and communities. A definition and framework for workforce nutrition can be found [here](#).

In recent years, Uganda has taken some critical steps to enable improved nutrition for the wider population by introducing the Presidential Initiative on Healthy Eating and Healthy Lifestyle, the Uganda Nutrition Action Plan 2020-2025, and the Nutrition Advocacy and Communication Strategy (NACS II) 2020-2025. However, policy frameworks often do not recognise the role of employers in enabling good nutrition for workers, even as part of labour policies. Further improved action in the policy arena would include explicitly mentioning the role of the employer and drafting, implementing and ensuring accountability mechanisms against these policies are in place. Such action could help start or scale up existing workforce nutrition programmes and contribute to addressing the Sustainable Development Goals, including SDG 2 (zero hunger), SDG 3 (good health and wellbeing), SDG 5 (gender equality), and SDG 8 (decent work and economic growth).

WIN-WIN-WIN APPROACH

As elaborated in a [GAIN evidence brief](#)⁴, poor-quality diets and insufficient food quantity are linked to reduced work capacity. This suggests that reducing malnutrition can be a win-win-win approach: improving individual lives, business outcomes, and national economies. Individual outcomes observed as a result of workforce nutrition programmes have included increased job satisfaction, reduced sick days, higher consumption of healthy foods, and increased duration of exclusive breastfeeding, amongst others. Business outcomes are reduced absenteeism, enhanced productivity, reduced

¹ Stevens, G. A., Beal, T., Mbuya, M. N., Luo, H., Neufeld, L. M., Addo, O. Y., ... & Young, M. F. (2022). Micronutrient deficiencies among preschool-aged children and women of reproductive age worldwide: a pooled analysis of individual-level data from population-representative surveys. *The Lancet Global Health*, 10(11), e1590-e1599.

² World Bank. (2022). *Poverty and Equity Brief, Sub-Saharan Africa - Uganda*.

³ Food and Agriculture Organisation (FAO). (2022). *The State of Food Security and Nutrition in the World 2022*. Rome, Italy.





⁴ Nyhus Dhillon, C. & Stone, G. (2019). *The evidence for workforce nutrition programmes*.

medical costs, and significantly lower rates of accidents and mistakes, which together could lead to an increase in the national GDP⁵. Thus **GAIN**, as part of the **Workforce Nutrition Alliance**, urges regulators and policymakers in Uganda to support employers by drafting, implementing, and monitoring public policies for improved workforce nutrition.

IMPROVING WORKFORCE NUTRITION-RELATED POLICIES

An outline of the four nutrition pillars for workforce nutrition and the related existing policies in Uganda is presented in Table 1. Through a comprehensive policy analysis, the table highlights opportunities to further employer-driven approaches for improving nutrition among formal worker populations. Even greater impact can be expected when expanding existing policies to cover workers in supply chains (as opposed to only those directly employed by the company) as well as establishing minimal accountability and reporting requirements against these policies.

Table 1: Existing policies and opportunities to further strengthen policies on Workforce Nutrition in Uganda based on analysis of national labour and nutrition policies

Nutrition theme	Existing workforce nutrition related policy components	Opportunities for further strengthening policies on workforce nutrition
Healthy Food at Work 	<ul style="list-style-type: none"> Reference to provisions for well-aerated meal area with chairs and/or benches and clean drinking water⁶ As part of the key (implementation) strategies for securing food and nutrition, there is reference to ensuring that employees get adequate meals at work^{7 8} 	<ul style="list-style-type: none"> Incentivise employers to subsidise healthy meal options available at or near the workplace (e.g. through tax benefits) Apply and incentivise minimum nutritional requirements for food provisioning (prioritising nutritious foods and minimising unhealthy food offerings) Ensure workers' representation in canteen management or food management committees
Nutrition education 	<ul style="list-style-type: none"> The Occupational Health and Safety guidelines (2021) focus on lifestyle and unsuitable work environment, including bad posture, correct way of lifting weight, and unhealthy foods⁹ The need to enforce regulations that address food and nutrition awareness and healthy lifestyles is reflected in strategic objectives, though there is no direct reference to targeting workplaces^{7 10 11} 	<ul style="list-style-type: none"> Incentivise employers and worksites to reinforce government mass media campaigns on healthy eating and good nutrition (<i>NACS-II and Presidential Initiative on Healthy Eating</i>) with messaging to workers
Nutrition-focused Health Checks 	<ul style="list-style-type: none"> The Public Service Standing Orders (2021) highlight that employers are to carry out medical examinations at regular intervals¹² The Presidential Initiative on Healthy Eating and Healthy Lifestyle has provision for regular medical check-ups while the second Uganda Nutrition Action Plan 2020-2025 references regular nutrition assessment for all workers in public workplaces^{10 11} 	<ul style="list-style-type: none"> Specify the inclusion of nutrition-related indicators as part of the medical examinations or check-ups. Require employers across all workplaces (not only public workplaces) to subsidise workers' health checks and/or nutrition counselling (either for all workers or at least those at risk, as identified by health checks). Ensure that pregnant workers have access to additional health screening (e.g., antenatal check-ups) during working hours
Breastfeeding Support 	<ul style="list-style-type: none"> The Employment Act 2006 provides for 60 days, 12 weeks, of maternity leave¹³ The Social, Safety, and Health implementation guidelines (2020) provide for lactation breaks⁶ Reference to the promotion of breastfeeding friendly corners in public and private institutions and workplaces^{14 15} Amendment of the employment act to provide for child care facilities at workplaces 	<ul style="list-style-type: none"> Extend paid maternity leave to 18 weeks as per International Labour Organization recommendation 191. Include and specify paid parental leave for supporting spouses (e.g. paternity leave) for at least two weeks. Incentivise employers to fast track the promotion of breastfeeding/baby friendly corners in public and private institutions, including for their own workers. Promote male empowerment and participation in breastfeeding (awareness) programmes as a greater component to be prioritized for inclusivity.

⁵ Lambrechts, M. & B. Stacy. (2020). Increasing productivity and reducing vulnerable employment. Atlas of the Sustainable Development Goals.

⁶ Ministry of Gender, Labour and Social Development. (2020). Section 2.1.2. Social, Safety and Health Standards Implementation Guidelines.

⁷ Ministry of Agriculture, Animal Industry and Fisheries & Ministry of Health. (2003). Uganda Food and Nutrition Policy.

⁸ Ministry of Agriculture, Animal Industry and Fisheries & Ministry of Health. (2004). Uganda Food and Nutrition Strategy and Investment Plan.

⁹ Ministry of Gender, Labour and Social Development. (2021). Occupational Safety and Health Guidelines for Office Work Environment.

¹⁰ Ministry of Health. (2019). Presidential initiative on healthy eating & healthy lifestyle.

¹¹ Nutrition Advocacy and Communication Strategy (NACS II) 2020-2025.

¹² Ministry of Public Service. (2021). Uganda Public Service Standing Orders.

¹³ The Employment Act, 2006

¹⁴ Office of the Prime Minister. 'Uganda Nutrition Action Plan (2020-2025): Leaving no-one behind in scaling up nutrition actions', Kampala, Uganda, 2020

¹⁵ Ministry of Health. (2007). Infant and Young Child Feeding Policy Guidelines.

A CALL TO ACTION

The government of Uganda has taken several positive steps regarding workforce nutrition-related policies by highlighting the need to provide for regular health assessments at workplaces, as well as by calling for breastfeeding-friendly corners in public and private institutions and workplaces. Further refining and expanding existing policies to encourage minimal but broad workforce nutrition standards would help address the burden of malnutrition. Essential considerations include incentivising employers to provide subsidized healthy meal options at or near the workplace and applying minimum nutritional standards for food provisioning. In addition, policymakers should consider incentivising employers and worksites to reinforce government mass media campaigns on healthy eating and good nutrition with targeted messaging to workers. Finally, an even greater impact could be achieved by expanding the coverage of existing policies to include workers in supply chains (as opposed to only those directly employed by the company) as well as ensuring minimal accountability and compliance mechanisms. When combined, these actions towards reducing malnutrition may be a win-win-win approach: improving individual lives, business outcomes, and national economies.