

# Migration, Mobility, & Displacement

Vol. 6, 2023

Claude Beaupre "**Domestic Workers in the Arabian Gulf: Precarity, reality, and resistance**" *Migration, Mobility, & Displacement* 6: 25-42

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**Published by**

The Centre for Asia-Pacific Initiatives  
University of Victoria  
3800 Finnerty Road, Victoria, BC, V8P 5C2, Canada  
[journals.uvic.ca/index.php/mmd/index](http://journals.uvic.ca/index.php/mmd/index)



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# Domestic Workers in the Arabian Gulf: Precarity, reality, and resistance

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## Abstract

*This paper's aim is to further the literature on the global Migrant Domestic Workers (MDWs) social movement aimed at denouncing their exploitation and asserting the value of their labour as an irreplaceable contribution to the functioning of society. The Gulf region has been largely absent in this literature. This article argues that this exclusion from the migrant-led domestic care mobilisation in no way implies that MDWs have made no efforts in Gulf states to improve their labour conditions, but that the context in which they are employed make it such that they are unable to organise together due to the stern policing and isolating norms that prevail. Instead, their resistance is predominantly situated within the confines they are subjected to, resulting in what has been called "everyday resistance." Drawing on relevant secondary literature on the systemic precarity experienced by domestic workers in the Gulf region and feminist scholarship on MDWs micro-level, everyday assertions, this article argues that the confined living situations under the Kafala labour system set the terms and conditions for how MDWs political resistance can be - and is - expressed.<sup>1</sup> By focusing on a global social movement premised on outward expressions of protest, the existing literature's omission of micro-level acts of resistance results in MDWs in certain contexts being overlooked as agents of social activism in their own right. This article contextualizes the strategies of resistance made by MDWs in the Gulf region by first examining the systemic and gendered control under the Kafala system. It then argues that the inclusion of everyday resistance allows for a more holistic vision of MDWs assertions of labour rights consciousness and ultimately of justice, one that includes a defensive protection of personal dignity and notions of selfhood.*

## Introduction

Most Arabian Gulf countries, meaning Bahrain, Iraq, Kuwait, Oman, Qatar, Saudi Arabia, and the United Arab Emirates, organise their migrant labour through the Kafala system. It is a temporary, contract-based system known for creating asymmetric power

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<sup>1</sup> Hollander and Einwohner, 2004, 545.

imbalances between the sponsor and the migrant, as the former is entirely in charge of all aspects of the latter's life, including residency, travel, and more.<sup>2</sup> Consequently, the labourer often finds him/herself in unfavourable working conditions with little to no recourse available to them. Half a century after discovering its vast oil reserves, Gulf nationals have grown accustomed to a lifestyle resulting from abundant, cheap-foreign labour, and the region is dependent on these power imbalances.<sup>3</sup> While the labour of migrants is recognized and indeed welcomed, they are viewed in terms of their labour output (i.e., expendable human commodities) in the context of the global, neoliberal political economy's logic of the division of labour. One can observe a paradox in which labour migrants in the Gulf are acknowledged as cornerstones of economic, social, and political sustainability but are met with wariness, stern policing, and general marginalization.

Within this broad context, migrant domestic workers (MDWs) are in a unique position given the specific nature of their work. Historically, MDWs have been subjected to two phenomena that have greatly limited their freedom and bolstered the authority of institutions and organizations to which they are subjected.<sup>4</sup> The first factor emphasizes MDWs' disposability in the workforce as they may be easily replaced due to the sizeable global supply of domestic labour. The second stresses the gendered control exercised by states, international enterprises, and individuals working to control to a maximum extent the embodied labour of women workers through management, discipline, and constraint. Both result from domestic labour's unique and intimate nature and the explicit power differentials that exist in the in-home situations in which their labour is based.

In response to these factors, there is a growing body of sociological and feminist literature documenting MDWs-led mobilisation efforts around the world, aimed at denouncing their exploitation and asserting the value of their labour as an irreplaceable contribution to the well-functioning of society.<sup>5</sup> The work of MDWs support the family-household in host societies through their labour in cooking, cleaning, washing, and often informal caregiving work for young and elderly dependents. As Marxist feminist scholar Silvia Federici (2016) describes, MDWs are organising in a global social movement, with women joining with other women from their own country and cultural background(s) to build multinational organizations, to lobby for public recognition, and ultimately to spread awareness about the value of social reproduction.<sup>6</sup> Literature to this effect also includes their growing presence in urban centers throughout the world and their increasing activist presence in transnational labour rights movements that denounce the discrimination MDWs suffer at the hands of government institutions, employment agents, and individual domestic employers (see for example research on MDW-led mobilisation in Hong Kong, the UK, the USA, Ecuador and With various

2 Roper and Barria, 2014; Fernandez, 2014; Parreñas, 2021, 17.

3 Choudry and Hlatshawo, 2015, 50.

4 Grossman-Thompson, 2019.

5 Federici, 2016; Parrenas, 2001; Ehrenreich and Hochschild, 2002, Sassen, 2002; Beneria, 2008.

6 Federici, 2016, 12.

reception levels and corresponding mobilisation, this labour movement has been most prevalent in Europe, Asia, and North America, with little to no apparent impacts within Gulf countries.<sup>7</sup>

Drawing on relevant secondary literature, the goal of this article is twofold. It argues that the perceived exclusion from the above migrant-led domestic care mobilisation in no way implies that MDWs have made no efforts in Gulf states to improve their labour conditions, but that the context in which they are employed makes it such that they are unable to organise together due to the stern policing and isolating norms that prevail. Instead, their activism for themselves and the value of their labour is predominantly situated within the confines they are subjected to, using what has been called “everyday resistance.”<sup>8</sup> It also argues that MDWs’ aim to reconfigure the power-over relationship of live-in arrangements should be included in the literature on the global MDWs social movement. It is important to include ‘less well-known’ contexts in social movement scholarship to allow for a more holistic vision of MDWs’ assertions of labour rights consciousness and ultimately of justice, one that includes a defensive protection of personal dignity and notions of selfhood.

It should be noted that this article focuses on the region as a whole. The author is aware that it would be naïve and downright erroneous to assume that each Gulf country has developed identically, be it politically or economically, since the 1970s. Indeed, tensions within the region would testify to its diversity in ideologies and governance. However, the shared adoption and similar interpretation of the Kafala system to recruit migrant workers have made this blanket approach less presumptuous. The author recognizes moreover that their analysis and its limited focus on secondary literature cannot attend to the culturally nuanced forms of MDWs’ actions, mediated by variations in nationality<sup>9</sup>, cultural and socioeconomic background<sup>10</sup>, class identity, and marital status, among other considerations. While similar versions of everyday acts of resistance have been found in studies on MDWs of diverse backgrounds employed in the Gulf region, one does not wish to essentialize MDWs.<sup>11</sup> Additional group-specific research would be needed to complement this article on a broader scale.

## **Gulf Countries and Labour Migration: Introducing the Kafala System**

Prior to the oil discovery in the early twentieth century, Arabian Gulf economies were predominantly dependent on the pearling industry and small-scale entrepôt trade.<sup>12</sup> The lucrative extraction of oil reserves, followed by the decolonisation of the Arabian Peninsula, generated a system of fast-paced economic growth throughout the region,

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7 Federici, 2016.

8 Fernandez, de Regt, and Currie, 2014

9 Hollander and Einwohner, 2004, 545.

10 Debonneville, 2019

11 For example, see studies on the experiences of MDWs in the Gulf region from South Asian (Global Alliance Against Traffic in Women, 2022), African (Global Alliance Against Traffic in Women, 2019b), and South East Asian (Global Alliance Against Traffic in Women, 2019a) countries.

12 Hanieh, 2011.

one that depended on the influx of foreign labour migrants not only to compensate for the small populations in these countries but also on additional expertise.<sup>13</sup> While there is a longstanding history of human mobility throughout the region, from other Middle Eastern countries as well as African and Asian states associated with the aforementioned commodities-exchange practices, it was not until the 1970's oil-price hike that foreign labour became a crucial component of the region's economic model.<sup>14</sup> As of 2020, migrants made up the majority of the population in half of the Gulf countries, ranging from 39% in Saudi Arabia, 46% in Oman, 55% in Bahrain, 73% in Kuwait, 77% in Qatar, and 88% in the UAE, illustrating the sheer dependency of the Gulf region on foreign labour.<sup>15</sup>

While human mobility throughout the region has always existed, as noted above, such large-scale dependency on foreign labour is rooted in the region's political development. Choudry and Hlatshawo (2015) have pointed out that state formation and economic development resulted in "the emergence of new inflows of temporary migrant labour which became central to the distinctive pattern of class formation in the newly independent states. Most importantly, a systematic institutional cleavage was established between citizens and the growing mass of migrant workers."<sup>16</sup> This 'cleavage' resulted in the entrenchment of an us-versus-them mentality, in which nationals were granted state-funded education, healthcare, housing subsidies, employment, access to land, and other miscellaneous financial support (such as marriage dowries).<sup>17</sup> In parallel, migrant workers came to be defined by their exclusion from this system as there are - still to this day - no or often highly contingent legal pathways to citizenship or permanent residency available to migrant workers regardless of the length of time in which they resided in the country, their nationality, and/or their expertise.<sup>18</sup> This cleavage, moreover, stands in stark contrast to the region's ingrained dependency on migrant labour. Indeed, as Choudry and Hlatshawo (2015) argued, Gulf nationals, in large numbers, having grown accustomed for over half a century to lifestyles brought about by abundant and cheap foreign labour and are now unwilling to accept the low wages and the working conditions of migrants, further entrenching the private sector's almost exclusive dependency on a foreign labour force.<sup>19</sup>

To ensure control over the large-scale migrant workforce, the region depends on a Kafala-based (sponsorship) labour system. As stated by Choudry and Hlatshawo (2015), "[t]hese features of migrant labour governance in the Gulf [via the Kafala system] are underpinned by a powerful and sustained discourse that fashions migration and migrants as variously imagined threats - 'security,' 'demographic,' 'cultural' and 'sexual' dangers are the typical tropes wielded by government spokespeople and in the region's media."<sup>20</sup> Consequently, all labour-intended entrance into the Gulf countries is devised

13 Choudry and Hlatshawo, 2015, 44.

14 Moors and Regt, 2008, 152.

15 DESA, 2021, 47-48.

16 Choudry and Hlatshawo, 2015, 44.

17 Hanieh, 2011.

18 Jarallah, 2009; Roper and Barria, 2014.

19 Choudry and Hlatshawo, 2015, 50.

20 Choudry and Hlatshawo, 2015, 49.

through this complex sponsorship arrangement in which an entity - be it a private citizen or corporation - is delegated the right to control the entry, exit, and everything in between of a worker as a means of mitigating this perceived threat.<sup>21</sup> In this manner, the employer owns the work permit, and the state subcontracts the surveillance and control of migrant labour to individual citizens and businesses.<sup>22</sup> It has resulted in an elaborate system of governance consciously designed to maximize labour exploitation while minimising the possibility of protest and resistance.

The Kafala system has widely been criticised for creating asymmetric power imbalances between the sponsor and the migrant.<sup>23</sup> If anything, numerous authors have pointed out the similarity between the Kafala system and bonded labour as workers are tied to particular employers, denied mobility between jobs, frequently have their passports withheld as well as their salaries, and are often trapped with significant levels of debt associated with purchasing their work permit.<sup>24</sup> Moreover, overlaying these controlling features are highly restrictive laws that ban migrant workers from forming unions, going on strike, or engaging in any political activism.<sup>25</sup> Any attempt at worker mobilisation or protest can be legally met with the termination of employment and immediate deportation, producing a state of permanent precarity for the vast majority of the Gulf's foreign working classes.<sup>26</sup>

Ultimately, the system creates a paradox, in which most labourers are widely acknowledged as cornerstones of the economic - and therefore social and political - well-being of the region but are met with wariness, stern policing, and general marginalisation. As such, for the migrants themselves, while their value and labour are recognised and indeed welcomed, they are deemed expendable via the simple fact that the neoliberal reality of the world economy renders them easily replaceable.

## **Domestic Workers in Gulf Countries: Systemically-encouraged Control**

As of 2013, Gulf countries were estimated to make up the largest MDWs hosting region in the world. By 2016, moreover, Gulf countries hosted nearly 4 million MDWs, 44% of which were women, with the remaining 56% being employed as drivers, mostly in Saudi Arabia where women are legally prohibited from driving.<sup>27</sup> These numbers, however, are most likely underestimates owing to the concentration of domestic workers in informal employment and among migrants in irregular situations. Indeed, according to a study by Shah and Al-Kazi (2017) in Kuwait, for example, 50% of irregular migrants in the country could be deemed MDWs.<sup>28</sup> The majority of MDWs in the Gulf originate from Asian and African countries such as Sri Lanka, the Philippines, Bangladesh, Nepal, India, and Ethiopia.<sup>29</sup>

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21 Roper and Barria, 2014; Fernandez, de Regt, and Currie, 2014; Hvidt, 2019.

22 Choudry and Hlatshawo, 2015; Malit and Naufal, 2016.

23 Roper and Barria, 2014; Fernandez, de Regt, and Currie, 2014; Roper and Barria, 2014; Hvidt, 2019.

24 Roper and Barria, 2014; Hvidt, 2019; Choudry and Hlatshawo, 2015.

25 Choudry and Hlatshawo, 2015.

26 Roper and Barria, 2014; Choudry and Hlatshawo, 2015, 50.

27 International Domestic Workers Federation, 2018, 17.

28 Shah and Al-Kazi, 2017.

29 International Labour Office, 2013, 32; Global Alliance Against Traffic in Women, 2022.

To facilitate these sizeable international movements, MDWs have multiple entry channels into the Gulf. In some instances, migrant-hopefuls who intend to work as MDWs do so through informal channels, asking relatives or friends employed outside of the country to find work for them and help organize their migration. A common term for this social process is chain migration which depends on personal networks, communication, and organisation. In other cases, employers reach out to their current MDW and inquire whether they are aware of someone else looking for domestic employment. In such instances, having a network of relatives and/or friends nearby who may act as a kind of support is an important factor when deciding where to migrate.<sup>30</sup> It would mean that the social and/or physical isolation that frequently befalls many MDWs would be lessened, even if only a little. Chain migration MDWs have access to greater job security as they are not subjected to a trial period once they arrive, rendering it more difficult to send them back to their home country if the employer is unsatisfied. As a result, they have more of a say in negotiating their labour contract before arriving in the host country/household.

Oftentimes, MDWs who arrive in the Gulf use recruitment agencies to identify and broker employment opportunities.<sup>31</sup> Those who migrate via the use of agencies - meaning that they have been recruited by them but are not in their direct employ - usually undergo a three-month trial period, in which case, should the employer be unsatisfied, the agency is obliged to find a replacement.<sup>32</sup> These agencies, as such, act as more than quality control middlemen for MDWs. As studies have shown, it is common practice for agencies to discipline (often corporally) the MDWs returned to them to 'convince' them to rejoin the family "as a better, more submissive worker."<sup>33</sup> Some agencies also strongly advise employers to restrict the mobility of MDWs altogether by disallowing their leaving the house without constant supervision.<sup>34</sup> Such notions only further entrench the regional practice of policing migrant workers and the perception that they are a potential threat and untrustworthy.

Out of the entire Gulf migrant labour workforce, women MDWs are particularly affected by the imbalance of power between the sponsor and the employee due to the intimate nature of their work in which the power structures are delineated in the employers' favour. Furthermore, as there is no distinction between where they work and where they reside, it renders the workers subject to the employer's command 24/7, creating a reality in which workers are at a clear disadvantage to negotiate clear boundaries around work hours, the conditions in which they work and reside, as well as the scheduling of said work.

For migrant domestic workers, the unfreedoms generated by the Kafala are so severe that they have been described as "structural violence" and forms of forced labour and

30 Moors and Regt, 2008.

31 Global Alliance Against Traffic in Women, 2019a.

32 Moors and Regt, 2008.

33 Moors and Regt, 2008, 159; GWAAT, 2019a, 37; Parreñas, 2021, 120.

34 Moors and Regt, 2008, 159.



contract slavery.<sup>35</sup> The dire working conditions of migrant domestic workers in the Gulf have been well documented.<sup>36</sup> Most of these studies focus on, or at least emphasize, the human rights abuses their employers subject them to. Human rights abuses in this context refer to a wide range of actions - some of which have already been mentioned - from “sexual harassment and sexual attack (ranging from propositions, threats of rape, and groping, to repeated rape), physical abuse (ranging from slaps to severe beatings), verbal abuse (harsh insults, threats, and belittlement), imposition of excessive working hours, unfair contractual terms, confiscation of passports, confinement to private homes and it may even reach the level of forcing the housemaids into the sex trade.”<sup>37</sup>

As Stroble (2009) points out, the “situation is exacerbated by the lack of labour laws protecting [migrant] workers [under the Kafala system], as well as popular attitudes [linked with the aforementioned perception that migrants pose threats] that reinforce this legal imbalance.”<sup>38</sup> As a result, various MDW-sending countries in both Asia and Africa refuse to permit their citizens from entering domestic labour contracts in all or specific Gulf countries.<sup>39</sup> Most Gulf countries, despite their significant migrant labour workforce, have not ratified most international human rights treaties, such as the International Covenant on Civil and Political Rights, the International Convention on the Protection of the Rights of All Migrant Workers and Members of Their Families, and the Convention against Torture, leaving these migrants particularly vulnerable to serious human rights violations.<sup>40</sup> As of 2013, the International Labour Office reported that all Gulf states had yet to ratify the 2011 ILO Domestic Workers Convention No. 189 protecting the rights of domestic workers.<sup>41</sup> While each Gulf state has labour laws that apply to MDWs, domestic workers remain one of the least protected groups of workers under national labour legislation.<sup>42</sup> Even allowing for the legal protections that are in place in Gulf countries, there is little procedural support to this day for MDWs to ensure that their employers abide by the agreed-upon labour contract and labour laws once they enter the household.

As private realms are frequently unmonitored, the power asymmetry created by the Kafala system is exponentially present in domestic settings. Even if Gulf countries had been signatories to every one of the aforementioned human rights treaties, the intimate reality of domestic work creates significant policing and enforcement challenges in instances of employee abuse. While this speaks to a jurisdictional obstacle that holds true in all states, it is exacerbated in a region that delegates worker-policing so willingly and indeed encourages it. As such, systemic improvements in the working conditions of MDWs in the Gulf can be understood as highly dependent on region-wide attitudinal changes towards the perception and treatment of these labourers.

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35 Parreñas, 2021, 9; Fernandez, de Regt, and Currie, 2014.

36 International Labour Organisation, 2007; Human Rights Watch, 2010, 2012, 2014, 2016; Varia, 2011; Global Alliance Against Traffic in Women, 2019a, 2019b, 2022; Silvey and Parreñas, 2019; Parreñas, 2021.

37 Jarallah, 2009.

38 Strobl, 2009, 165.

39 Global Alliance Against Traffic in Women, 2019a, 24; Global Alliance Against Traffic in Women, 2019b; International Trade Union Confederation, 2017, 6.

40 Jarallah, 2009.

41 International Labour Office, “C189 - Domestic Workers Convention, 2011 (No. 189).”

42 International Labour Organisation, 2014.



In a study on the working conditions of MDWs in the Middle East by Fernandez, de Regt, and Currie (2014), the authors highlighted how employers frequently ignored their contractual obligations with relative impunity, which constitutes an interesting juxtaposition to the stern policing experienced by MDWs.<sup>43</sup> For example, the majority of women they interviewed typically worked between 10 and 16 hours a day and were frequently limited to one, two - or often no - days off in a given month. Indeed, their study showed that MDWs are particularly prone to control measures as they must “abide by the ‘rules of the house’ around whether and when they can leave the house, what time they must return, and what they can do to relax both inside and outside the house.”<sup>44</sup>

Fernandez, de Regt, and Currie’s (2014) research findings along with others on the Gulf region are consistent with studies on MDWs around the world, which show that these (predominantly) women workers have historically been subjected to two factors that have greatly limited their freedom and bolstered the power asymmetry between employee and employer. The first presents a logic of domestic workers as disposable (i.e., cheap and easily replaceable) units of labour and production, and the second presents a logic of gendered control (i.e., management, discipline, and constraint) of women workers by various authority figures from employers, states, employment agencies, and so forth. Both result from the unique and intimate nature of domestic labour and the explicit power differentials that are emboldened in the in-home situations.<sup>45</sup> Both factors are unquestionably applicable to the reality of MDWs in Gulf states. Not only are they a significant portion of the cheap labour workforce on which the states base their economies,<sup>46</sup> but also the nature of the control exerted on MDWs is predominantly gendered.

According to Fernandez, de Regt, and Currie (2014), for migrant domestic workers on Kafala contracts, freedom of mobility and behavior are the two primary areas of contestation with their employers.<sup>47</sup> These two freedoms are integrally linked to the structural conditions of a migrant domestic worker’s employment - that is, the (illegal but standard) confiscation of migrant domestic worker passports and working permits by employers.<sup>48</sup> This confiscation of papers effectively limits women’s freedom to move outside the employers’ homes and their ability to run away. Moreover, employers’ restrictions on women’s mobility are often justified to ensure “they would not ‘waste money,’ ‘get into bad company,’ or become pregnant.”<sup>49</sup> Indeed, one researcher examining MDWs in the UAE found that close to one-half of all the workers they interviewed had never left the houses of their employers on their own - without employer supervision - over the two years that they had been in the country.<sup>50</sup>

43 Fernandez, de Regt, and Currie, 2014.

44 Fernandez, de Regt and Currie, 2014, 55.

45 Grossman-Thompson, 2019.

46 Jarallah, 2009.

47 Fernandez, de Regt, and Currie, 2014, 57.

48 Fernandez, de Regt, and Currie, 2014; Global Alliance Against Traffick in Women, 2019a.

49 Fernandez, de Regt, and Currie, 2014, 57.

50 Choudry and Hlatshawo, 2015, 48.

In some direst cases, these severe restrictions have been linked to MDWs attempting suicide. In Kuwait, for example, a 2002 study examined the frequency with which domestic workers would jump out of multi-story buildings, labelling this as the ‘jumping syndrome’ phenomenon, which found that there were approximately two to three cases of severe fractures per week as a result of jumping.<sup>51</sup> Another study conducted in a psychiatric hospital in Kuwait reported that a desire to end one’s life is about five times higher among the ranks of MDWs compared to Kuwaiti women.<sup>52</sup>

Isolation mixed with systemic control has often resulted in migrant workers being unaware of the legal recourse options they have at their disposal.<sup>53</sup> Legally, if a migrant has been brought into the country via a recruitment agency - which is true of most - both the employee and employer can contact the agency at any time for third-party mediation or physical removal of the labourer if the situation turns sour.<sup>54</sup> However, the reality remains that the power structure in place leans in favour of the employer, often resulting in the agency being an additional means of control and coercion over the migrant, ensuring submission through whichever means necessary.<sup>55</sup> In the Kafala system, should the sponsor decide to break the contract, the employee immediately loses his or her residence permit and is obliged to return home within a short window of time. While they are legally bound to meet every requirement of the labour contract, this obligation is often circumvented at the expense of the migrant.<sup>56</sup> A sponsor is not required to provide a reason or explanation for breaking a contract, and MDWs live in constant fear of angering their employers and being removed from their position. Moreover, due to financial incentives that have propelled them to seek employment abroad in the first place, MDWs are prepared to endure considerable hardship rather than shorten their contract period and return home empty-handed.<sup>57</sup>

The experiences of domestic workers in Gulf states fall within Grossman-Thompson’s (2019) frameworks of labour disposability and gendered control.<sup>58</sup> Under the Kafala system, these women are considered essential to the status quo as a group; however, their place within the system is of little significance to the State, their employer, and/or the agencies that recruit them. The sociolegal and political context of their employment condones various lawful yet unjust practices that create conditions of possible abuse and exploitation in the domestic sector. Moreover, they are controlled by the Kafala system and the private nature of their work that jointly aim at ensuring obedience and docility. It should be added, however, that these factors are not solely relevant to the Middle Eastern region but also to the global domestic migration industry to varying degrees.

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51 Shah et al., 2002.

52 Shah et al., 2002.

53 International Labour Organisation, 2007; Human Rights Watch, 2010; Varia, 2011; Global Alliance Against Traffic in Women, 2019a; 2019b; 2022; Parreñas, 2021.

54 Fernandez, de Regt, and Currie, 2014, 60.

55 Fernandez, de Regt, and Currie, 2014, 60.

56 Longva, 1999.

57 Global Alliance Against Traffic in Women, 2019a.

58 Grossman-Thompson, 2019.

## MDW Resistance in the Gulf: A Covert Affair

As discussed, the Gulf region is noticeably absent in the growing body of sociological and feminist literature on the global MDW-led movement fighting for basic workers' rights and denouncing the discrimination they suffer at the hands of the institutions and their employers. As Federici (2016) describes, the movement resulted from women banding together and joining with other women from their own country and other cultural backgrounds to spearhead multinational organizations and enact change.<sup>59</sup> Eventually, these groups were able to spread awareness on the hidden conditions of domestic work, lobby politicians, stage marches, and hold rallies. Moreover, a crucial aspect of these efforts has been the creation of informal networks providing a reference point for new arrivals, and sharing information on vital elements such as housing, employment, and migration laws by MDWs for MDWs.

Equally important to the MDW mobilisation efforts has been the construction of new relationships with public space(s), both physical and virtual.<sup>60</sup> Seen at first as a place of danger where MDWs could be stopped by the police or suffer other forms of abuse, public space has become a place of encounters, to regain the autonomy that they are denied daily and to reach out to the broader public, leading to greater visibility of their demands.<sup>61</sup> Virtually, moreover, MDWs were able to create informal networks on online groups and forums not only to alleviate the isolation of live-in domestic work and commiserate, but also to seek guidance on difficult situations.

The literature on MDW-led labour efforts has focused mainly on Europe, parts of Asia, and North America. Even as the biggest migrant-labour receiver, little attention has been paid to such activities in the Gulf region;<sup>62</sup> presumably because of the stern policing and isolation experienced by MDWs under the Kafala system. While the Kafala system may prohibit MDWs organizing en masse, this does not mean that MDWs working in these countries have not attempted to improve their labour conditions. Instead, any act of resistance must be covert and situated within the confines to which they are subjected. Due to the lack of recourse available to them, be it legal, emotional, administrative, or otherwise, MDWs in the Gulf region are perpetually under threat of being returned home penniless or in debt. Their precarity is such that they face the real possibility of not only being dismissed (without notice or reason), but also physically and mentally harmed if they are found to be defiant, let alone 'mutinying' and rallying against the system.

The public/private divide must be taken into account when making assumptions about who a real activist is, lest a bias of public visibility (i.e. street protest, high public profile) erases the resistance work of MDWs in more restrictive settings. While all state regimes disproportionately bear down on MDWs' "capacity to resist,"<sup>63</sup> studies in non-Western

59 Federici, 2016, 12.

60 Federici, 2016.

61 Federici, 2016, 12.

62 De Bel-Air, 2018.

63 Federici, 2016, 11.

settings<sup>64</sup> rarely associate these privatized acts with feminist labour consciousness and activist movements. A resistance, moreover, needs to be understood within the asymmetrical power relations in which it is performed. Such acts of resistance are often not confrontational or overt assertions of labour rights consciousness, but rather defensive protection of personal dignity and notions of selfhood or a reminder to oneself that their worth as human beings goes beyond their labour outputs and market wage. Such individual-level resistance follows Baaz, Lilja, and Vinthagen (2018) definition, as acts that “extend the space for making choices and open up possibilities by undermining, destabilizing, or restructuring such power relations that limit and produce our (possible) identities, actions, space or bodies.”<sup>65</sup>

Domestic workers in the Gulf engage in what Fernandez, de Regt, and Currie (2014) called “everyday resistance” through small but consistent actions and attitudes in which workers express their agency. In this context, agency can be defined as “the socioculturally mediated capacity to act” within the host country and host household.<sup>66</sup> The conception of resistance as such is defined according to its context; in contrast to ‘louder’ forms of political assertion (i.e., mobilising, unionising, marching, lobbying, and so forth), everyday acts of resistance during live-in employment have covert, demure, and subtle qualities.<sup>67</sup>

Moreover, the exercise of agency is linked to a call for recognizing a labourer’s worth and the worth of their labour. It is also a call for the recognition of their personhood, an attempt to remind all parties to a system that has marginalised them for so long that MDWs are integral parts of societies and that they belong with and within those societies. Agency in terms of migration is often understood in terms of the economic push and pull factors that lead one to leave their home searching for opportunity. The decision to leave one’s country and leave all reference points to work as a MDW is challenging and brave. While economic incentives might propel one to consider the move, the individuals who migrate are “combative women, prepared to face many hardships and even a loss of social status to give a better life to their families.”<sup>68</sup> As such, MDW agency extends beyond their ability to cope with the difficulties they might face upon arrival and throughout their stay in their host country. Agency includes all the decisions and actions they undertook before ever setting foot outside their country. Indeed, studies show that many MDWs are aware of the potential for abuse in the host country prior to their departure, with many MDWs choosing to return to domestic work in Gulf states multiple times.<sup>69</sup> With the exception of situations of forced migration/labour,<sup>70</sup> human mobility should be viewed as a kind of agency, and not merely the product of neoliberal capitalist forces.

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64 See, for example, Longva, 1999.

65 Baaz, Lilja and Vinthagen, 2018, 34.

66 Fernandez, de Regt and Currie, 2014, 55.

67 Hollander and Einwohner, 2004, 545.

68 Federici, 2016, 11.

69 Global Alliance Against Traffic in Women, 2019a, 4.

70 Global Alliance Against Traffic in Women 2019a, 44; Silvey and Parreñas, 2019.

As such, Scott (1985) conceptualised covert resistance as “hidden transcript[s]” that lies somewhere between structure and agency, stating that “[m]ost of the political life of subordinate groups is to be found neither in the overt collective defiance of power holders nor in complete hegemonic compliance, but in the vast territory between these two polar opposites.”<sup>71</sup> These forms of resistance are deemed particularly effective in instances where violence (or the threat of it) is used to ensure the continuity of the status quo, albeit one that allows “a veiled discourse of dignity and self-assertion within the public transcript [...] in which ideological resistance is disguised, muted, and veiled for safety’s sake.”<sup>72</sup>

Under the Kafala system, workers are actively and systemically kept from each other. Hence, acts of resistance remain at an individual level, affecting only the parties directly involved in the situation, be it the employer, employee, and/or the hiring agency (if applicable). Such tactics were documented in various studies, which show that domestic workers would resort to lying, pilfering, slandering, gossiping, avoiding tasks/individuals, hiding, passive-aggressiveness, feigned ignorance, and foot-dragging.<sup>73</sup>

Another means of covert resistance employed by MDWs - and indeed by those engaged in many other industries - has been to circumvent the system entirely by actively choosing to be employed illegally. As discussed above, migrant workers in the Gulf are only allowed within the region under the patronage of a sponsor; this, however, has not stopped many from engaging in “freelance” work by remaining in these countries irregularly and taking it upon themselves to seek employment once they arrive. As Moors and de Regt (2008) point out, there are various ways in which a worker may enter these countries illegally; they may stay after their initial legal contract expires and choose to remain, enter via a tourist visa, getting smuggled in, or paying someone to be their sponsor even though they are not working for them directly.<sup>74</sup> While freelance MDWs may enjoy greater freedoms in terms of their living and working conditions, and may even be able to earn a higher income without the direct overarching supervision of a live-in employee,<sup>75</sup> there is some debate over the freedoms associated with the freelance option. For example, Parreñas’ (2021) study on ‘freelance’ Filipino MDWs in the UAE found that all interviewed participants would prefer to be legally-employed in a ‘bad’ (i.e., abusive) household than remain in their current situation, often citing their lack of access to healthcare, their inability to travel, and their fear of being discovered by authorities.<sup>76</sup> Freelance migrants are a particularly vulnerable group. While they enjoy a range of benefits from their illicit activities, their status - or lack thereof - creates whole new set of challenges, including not being able to leave the country and/or receiving hefty fines and risking jail should they be caught by the authorities.<sup>77</sup>

71 Scott, 1985, 136.

72 Scott, 1990, 137.

73 Global Alliance Against Traffic in Women, 2019a; 2019b; 2022; Parreñas, 2021.

74 Moors and de Regt, 2008.

75 Moors and Regt, 2008, 162-163.

76 Parreñas, 2021, 122.

77 Moors and Regt, 2008; Parreñas, 2021.

## Conclusion

This article examined the reasons why migrant domestic workers in the Arabian Gulf have not been part of the international domestic worker mobilisation movements that Federici (2016) identified.<sup>78</sup> To be sure, the region has been the subject of many studies that focus on migrant workers, including migrant domestic workers. However, as part of the growing body of sociological and feminist literature about the conditions of migrant domestic workers, most of it has focused on denouncing the treatment of mainly women workers, but rarely on their resistance - both active and passive.<sup>79</sup>

As discussed above, the Gulf region is highly dependent on migrant labour practices, as are the political structures of these states. While foreign labour is widely acknowledged as a key to the region's economic, social, and political sustainability, it is met with stern policing, and severe marginalisation. For the migrants themselves, while the value of their labour is recognised and indeed welcomed, they are themselves deemed expendable and easily replaceable due to the neoliberal reality of the global economy. Consequently, the political and legal practices of the region and the pervasiveness of the exploitive and abusive conditions in which these workers are employed make it such that their resistance - while maybe not easily perceptible - must be covert and situated within the confines in which they are subjected. MDW resistance in the Gulf requires entirely different tactics than those mentioned in Federici's (2016) work, in which domestic workers mobilised, marched, lobbied, and/or created unions to better their situation and boost the recognition of their labour.<sup>80</sup> Instead, resistance is kept at the micro-level, covert, and inherently outside politics.

There are huge variance in how MDWs are expected to perform their duties, including what constitutes their duties, the hours they work, their living arrangements, including access to food, access to sleep, and even how they communicate with their families. The specificities of each MDWs living and employment situation are household-dependent.<sup>81</sup> As such, it should be added that not all MDWs who work in Gulf are subject to abuse; rather, the Kafala system under which they are employed regularly or irregularly creates the conditions in which they are vulnerable to exploitation and abuse. MDWs' individual resistance to their employment situations are as unique as their household situation.

Papadopoulos and Tsianos's (2013) formulation of the autonomy of migration thesis highlights that migration - and human mobility in general - transcends conceptualisations of authority and control and the citizen-versus-other dichotomy in a way that allows migrants to exercise their mobility against and/or beyond existing sovereign mobility controls. Indeed, according to them, migration practices have led to the creation of a mobile common, a "world of knowledge, of information, of tricks for

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78 Federici, 2016.

79 International Labour Organisation, 2007; Human Rights Watch, 2010, 2012, 2014, 2016; Varia, 2011; Global Alliance Against Traffic in Women, 2019a; 2019b; 2022; Silvey and Parreñas, 2019; Parreñas, 2021.

80 Federici, 2016.

81 Parreñas, 2021.

survival, of mutual care, of social relations, of services exchange, of solidarity and sociability.”<sup>82</sup> Mobile commons have enabled migrants to exploit, traverse, and remain resilient to the challenging realities of international migration.

Dadusc, Grazioli and Martínez (2019) added that as organisational practice, mobile commons can constitute new ways of relating and delimiting boundaries beyond the traditional regime framework of citizenship, in a way that reasserts migrants of their worth as humans and the worth of their labour.<sup>83</sup> Mobile commons as a practice, therefore, is a key element of the global MDW movement to resist systemic abuse and assert the value of their contributions to host societies, especially in the Middle East where the social fabric of the region is inherently dependent on MDWs.

Papadopoulos and Tsianos (2013) mention that “justice” in migration should be viewed as formulating what is just and what is unjust in the everyday conditions of existence including daily social relations, connections, and conditions. According to Papadopoulos and Tsianos (2013) and Trimikliniotis, Parsanoglou, and Tsianos (2015), justice will best be achieved through ‘mobile commons,’ a recourse and path for migrants to alleviate the pressures of capitalist exploitation and survive the pressure of otherness designated by their legal (or illegal) status.<sup>84</sup> The mobile commons understand that migrants operate outside the political, sovereign realm, sometimes transforming the political without ever addressing or confronting its legal and/or social codes. Instead, migrants’ “develop their own codes, their own practices, their logics which are almost imperceptible from the perspective of existing political action,”<sup>85</sup> a logic that can best situate MDWs acts of everyday resistance in Gulf states. Justice therefore cannot be achieved solely through the mobilisation tactics mentioned in Federici’s (2016) work; it is both overt and covert.<sup>86</sup> While Papadopoulos and Tsianos (2013) allow for unionisation and the like to be at times “indispensable, necessary and crucial for migrants,” they view the development of ‘justice’ as a more “ordinary,” everyday endeavour.<sup>87</sup>

It should be noted, moreover, that covert acts of resistance to the injustices MDWs face are not restricted solely to those without the ability to resist in more overt, public ways. Indeed, should the socio-cultural context in which MDWs find themselves allow public mobilisation, it does not preclude them from engaging in complementary everyday acts of resistance should they see fit. As such, formulating justice for domestic care mobilisation around the world should include the recognition of everyday acts as an exercise in migrant agency. Doing so would not only paint a more complete picture of global MDW mobilisation by including areas like the Middle East, but it also allows for greater recognition of the efforts made by MDWs in the restricted contexts like the Gulf region to actively utilise the mobile commons to reassert themselves and their worth within the confines to which they are subjected.

82 Papadopoulos and Tsianos 2013, 190.

83 Dadusc, Grazioli and Martínez, 2019.

84 Papadopoulos and Tsianos, 2013; Trimikliniotis, Parsanoglou, and Tsianos, 2015

85 Trimikliniotis, Parsanoglou, and Tsianos, 2015, 39.

86 Federici, 2016

87 Trimikliniotis, Parsanoglou, and Tsianos, 2015, 39.





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