TWC2
transient workers count too

Not good anywhere

Laws and gaps affecting Bangladeshi workers in other major destination countries

August 2025

that his salary was too low to sustain him which was one of the reasons that prompted him to come to Singapore for work. Similarly, Interviewee 14 who had serving in the Bangladesh army since 2006, reported that he was only earning 4,00 Taka ($92[1]). Even after he had left the army to work as a clerk he was still paid meagrely. Interviewee 12 was pursuing a law degree but had to drop out abruptly due to financial struggles at home and had to look for work instead. Interviewee 15 was pursuing his bachelor's in business management but was told by his brother to dro out because what he was studying was "no use".

The above puts into perspective the strong motivation many Bangladeshi m seek employment abroad. However, when asked "Why Singapore?" given also move to countries like UAE, Qatar, or various parts of Europe, 19 o respondents shared a common reason: personal ties. They chose Singa they had relatives such as fathers, uncles, brothers and cousins who were had worked in Singapore. These personal connections made them feel more comfortable, influenced their decisions and provided advice or encouragemen begin their migrant journey. After all, having a social connection to someone w migrant experience from a particular destination is an important resource for a prospective migrant (Rahman, 2017).

In a journal article that researched trust and corruption in Bangladesh, the result showed that out of 1,200 responders only 2.42% of respondents agreed that they completely trust new acquaintances and 35.7% believed that someone that they had just met for the first time should not be trusted in any capacity (Toyon, 2022). While

were unaware of its existence, though that is not the only reason why respond spoke mostly of using unlicensed agents, who are often Bangladeshi nationa operating illegally in Singapore (dalals). The latter have connections with Sing companies or Singapore-licensed agencies and it is these connections that e their effectiveness (Rahman, 2017).

Reflecting this, respondent #5 detailed difficulties in finding a Singaporean agen willing to help him look for a job during his salary claim process. He speculate these agencies potentially earn more when workers go through dalals who i deal with the Singaporean agencies. TWC2 case officers have heard from that they were turned away by Singapore licensed agents only to be "help referred to other brokers who turned out to be dalals. Respondent #2 fu confirmed this theory, sharing with us that over the 11 years he has wor Singapore, he came to learn that these dalals operate in a systematic wa collect the passports from workers who are looking for a job before passing it off t Bangladeshi middle man who then applies for IPAs with the assistance of Singapo licensed agents.

Amounts charged by dalals tend to be over $2,000 despite the law. The Employment Agencies Act has limited the chargeable agent fees for Singapore employment agencies to no more than one month of the worker's salary for each year of their permit validity, capped at two months of salary (MOM, 2024). This cap applies to Singapore-licensed employment agencies. However, as dalals are already breaking the law in providing job-matching services without a licence, they no doubt see no

An employee cannot be considered free if exercising his right to salary would lea his termination, which in turn is concomitant with other challenges such as pay debts. Thus, reform of policies relating to salary payment is inadequate without worker protection over job mobility.

From the Middle East to Asia, limited job mobility is a common issue for migrant workers, strung primarily to a sponsorship system that has manufactured extrem power imbalance in an employer-employee relationship. In the Gulf, this syste generally known as the *kafala* sponsorship system (although Bahrain and Qa recently abolished it). While specifics differ, broad similarities in structure observed since the system emerged to regulate the new influx of migrant amidst similar historical, political and economic conditions shared by th states.

Under this system, the sponsor or the *kafeel* (citizens or local companies) is given permit to employ foreign workers. Migrant workers are dependent on their employe to obtain, renew and cancel work permits, residency visas and their identity cards. Travel, food and accommodation costs are also covered by the employer. Should workers wish to change jobs, they have to obtain the consent of the employer. Finall some states additionally mandate migrant workers' exits to be controlled by their employer: only earlier this month, Kuwait joined Saudi Arabia in legislating mandatory

0. Contents

Transient Workers Count Too, Singapore

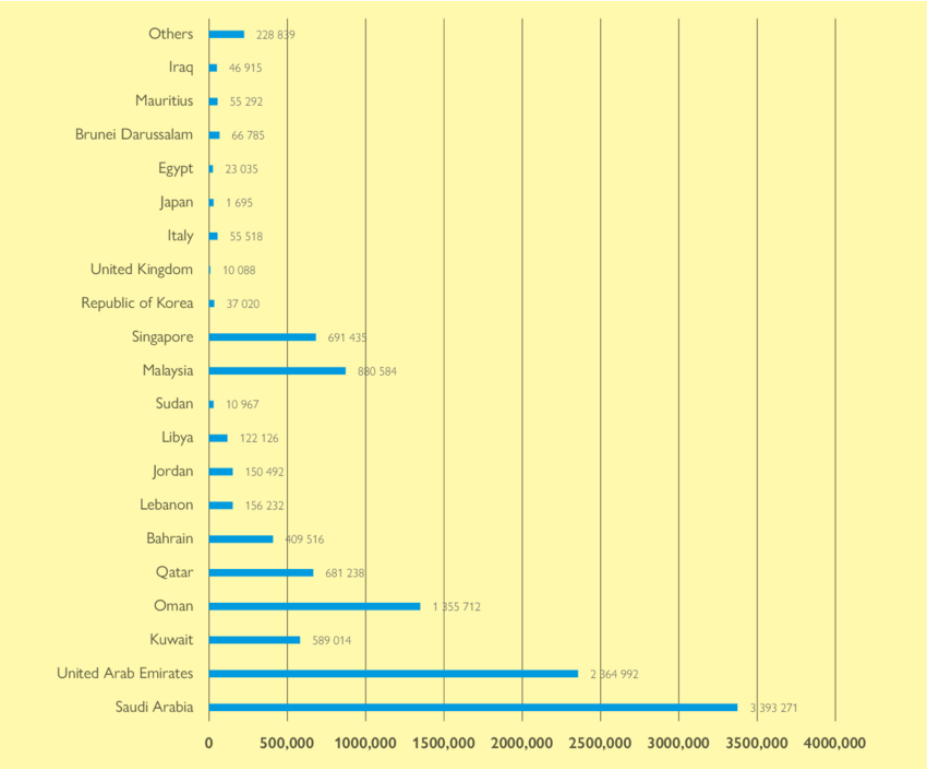
www.twc2.org.sg

Terese Teoh, August 2025

I. Introduction

Since the 1970s, Bangladeshis have long begun migrating to other countries in search of work, particularly the Gulf States (Saudi Arabia, the United Arab Emirates (UAE), Kuwait, Oman, Qatar, Bahrain) (see Graph 1 below). Today they comprise the world's sixth largest source of migrant workers.[1] In the 1980s, demand for foreign workers grew further as the Gulf states enjoyed a post-oil discovery economic boom. Although this demand first came from surrounding Arab states, over time the Gulf states' political distrust of Arab migrants led to the growth of the South Asian migrant population.[2] While reports differ as to the exact percentage of Bangladeshi workers who migrate to the Middle East — some suggest 65%[3] while others suggest 80%[4] — it is clear that Bangladeshi migrants are one of the top expatriate populations in the region. See graphic at right.

Yet, the last fifty years of migration have not changed the fact that Bangladeshi migrant workers remain in a vulnerable position that subjects them to continued patterns of abuse and exploitation. In some cases, employers act with impunity, with blatant disregard of the legal consequences of their violations. In other cases, limited legal rights constrain the employees' bargaining power, pointing to urgent reform needed under the law.



To investigate the uneven legal rights across different regions, this paper first undertakes a comparative study of the employment laws in the jurisdictions in which

[1] ITUC CSI IGB. Survey Analysis: Monitoring Recruitment of Bangladeshi Migrant Workers. International Trade Union Confederation; 2023.

[2] Deutsche Gesellschaft für Internationale Zusammenarbeit (GIZ) GmbH and International Labour Organization. Labour Market Trends Analysis and Labour Migration from South Asia to Gulf Cooperation Council Countries, India and Malaysia. International Labour Organisation; 2015.

[3] Deutsche Gesellschaft für Internationale Zusammenarbeit (GIZ) GmbH and International Labour Organization. Labour Market Trends Analysis and Labour Migration from South Asia to Gulf Cooperation Council Countries, India and Malaysia. International Labour Organisation; 2015.

[4] Bossavie L. *Low-Skilled Temporary Migration Policies: The Case of Bangladesh*. World Bank; 2023.

Bangladeshi migrant workers are likely to migrate to. Across the receiving countries, what are the legal frameworks that presently exist to protect migrant workers and how do they differ? Second, this paper evaluates why legal rights may remain stagnant and identifies factors that can contribute to their advancement. Why do legal protections for migrant workers remain so underdeveloped in some countries but not in others?[5] As this study is based on an online review of published and publicly accessible reports, I acknowledge the paper's inherent limitations in assessing the effectiveness of the legal frameworks in terms of actual implementation.

II. Common issues across jurisdictions

Some broad patterns in the common issues faced by migrant workers were identified across the different jurisdictions and regions, which I explore below.

2.1 Excessive recruitment fees and debt bondage

There is no universal or widely accepted definition as to what constitutes recruitment fees.[6] Recruitment fees can include: expenses incurred in both the migrant's home country and destination country, transportation costs, and more.[7] As the first stage before a migrant's overseas venture, the recruitment process often carries its implications into the type and quality of job the migrant subsequently falls under. While high-income migrant labour tends to have a cost-free recruitment process, those who engage in low-cost or manual labour often need to fork out expensive recruitment fees.

To protect workers, some Gulf states (Bahrain, Oman, Qatar, Saudi Arabia, the United Arab Emirates) have introduced legislation prohibiting recruitment fee charges to migrant workers.[8] Thus, neither employers nor the recruitment agency may collect expenses from migrant workers. Unfortunately, enforcement remains an issue. A 2022 study showed that Qatar recruiters continue to flout the law, and have been accused of charging some of the highest commissions in the region.[9] Since 2019, Qatar has opened 14 visa centres in Bangladesh, India, Nepal, Pakistan, the Philippines and Sri

[5] Note: Rights related to domestic workers are excluded from the scope of this study.

[6] International Labour Organisation. Global Study on Recruitment Fees and Related Costs, Second Edition 2024. Geneva: International Labour Office Accessed July 11, 2025. https://www.ilo.org/sites/default/files/2024-10/Global_report_master_combinated_web.pdf

[7] International Labour Organisation. Global Study on Recruitment Fees and Related Costs, Second Edition 2024. Geneva: International Labour Office Accessed July 11, 2025. https://www.ilo.org/sites/default/files/2024-10/Global_report_master_combinated_web.pdf

[8] International Labour Organisation. Global Study on Recruitment Fees and Related Costs, Second Edition 2024. Geneva: International Labour Office Accessed July 11, 2025. https://www.ilo.org/sites/default/files/2024-10/Global_report_master_combinated_web.pdf

[9] Saraswathi V. Huge recruitment fees charged for jobs in the Gulf; Qatar recruiters accused of demanding the highest commissions - Migrant RightsMigrant Rights. Migrant Rights. Published June 25, 2022. https://www.migrant-rights.org/2022/06/huge-recruitment-fees-charged-for-jobs-in-the-gulf-qatar-recruiters-accused-of-demanding-the-highest-commissions/

Lanka to allow potential migrant workers to process their visa applications and obtain information about their employment contract. Arguably, this can help protect them from scams, but not high fees, as recruiters have many ways to work around the rules.

Finally, fair recruitment guidelines such as the Employer Pays Principle are a helpful indicator of best practices that should be adopted by employers across all industries. According to this Principle, the employer bears the full costs of recruitment at all stages of the process. In addition, governments have responsibility to take measures to eliminate the solicitation of illicit money from workers and all forms of economic coercion.[10] Unfortunately, a 2024 report by the Business & Human Rights Resource Centre found that majority of companies assessed are not acquainted with this Principle.[11]

2.2 Wage theft

Wages remain the paramount concern for many migrant workers, especially since the primary reason for migration is to find work. For these workers who support their families through remittances, having adequate, predictable and timely payment of wages is crucial.[12]

The concept of wage theft refers to delayed payment, underpayment or non-payment of salary and earned benefits, which includes end-of-service benefits. In Singapore, a 2014 survey conducted by TWC2 found this to be a pervasive issue. Specifically, the data showed that out of three-quarters of a million male Work Permit holders,

- One third did not get their correct salaries paid on time;
- One third believed their salaries were correct, but had no way to check since they received no detailed calculation; and
- One third could check and satisfy themselves that correct salaries were paid.

To address the widespread occurrence of wage theft, several Gulf states introduced a mandatory electronic bank transfer system, known as the Wage Protection System (WPS), to officially record salary payments. By flagging to authorities whenever there is underpayment or non-payment, the WPS allows authorities to detect more easily when salary payments are missed. This reform was led by the UAE in 2009, and was soon followed by Saudi Arabia (2013), Oman (2014), Qatar (2015), Kuwait (2015) and Bahrain (2021). Unless paid through the WPS, salary will otherwise be considered unpaid. This process also improves the wage complaint system for workers.[13]

Following the introduction of the WPS, some positive results evince the scheme's effectiveness. In Qatar, the number of wage complaints by workers dropped by 30.4%

[10] International Labour Organisation. General Principles and Operational Guidelines for Fair Recruitment and Definition of Recruitment Fees and Related Costs. International Labour Organisation; 2019. https://www.ilo.org/sites/default/files/wcmsp5/groups/public/@ed_protect/@protrav/@migrant/documents/publication/wcms_703485.pdf

[11] https://media.business-humanrights.org/media/documents/Final_Engie_Assessment.pdf

[12] International Labour Organisation. Guidance Note: Wage Protection for Migrant Workers. International Labour Organisation; 2023. https://www.ilo.org/sites/default/files/wcmsp5/groups/public/@ed_protect/@protrav/@migrant/documents/publication/wcms_878456.pdf

[13] Jureidini R. Wage Protection Systems and Programmes in the GCC. European University Institute (EUI) and Gulf Research Center (GRC); 2017. https://gulfmigration.grc.net/media/pubs/rp/GLMM_EN_2017_RR01.pdf

from January 2016 to October 2016. However, one fundamental weakness of the WPS is that it relies on data reported by employers without any independent verification, which opens up a possibility of data being manipulated. Should payslips not be provided to the employee, employees are also unable to detect the underpayment of salary.[14]

Penalties for breach of WPS regulations typically involve fines and the reduction or ban of work permit visa quotas. In the UAE, if salary payment is late by more than 16 days, the company will no longer be allowed any new work permits.[15] In Saudi Arabia, a three-month delay in payment would allow the worker to transfer jobs without the employer's consent.[16] In 2015, the Ministry of Labour reported that 1,441 companies had been "shut down" due to labour violations, with close to half of them concerning the WPS.[17] Rarely is criminal prosecution used, even though some states (e.g. in the UAE) have stipulated under law that wage theft is a criminal offence.

2.2.1 Minimum wage legislation

Given the limits placed upon the collective bargaining power of employees, mandating a non-discriminatory wage floor, i.e. one which applies equally to locals and foreigners, is critical to ensure worker protection against unduly low pay.[18] Except for Qatar,[19] the other Gulf states do not have minimum wage legislation for migrant workers in all sectors. Some Gulf states have designed minimum wage legislation in other ways which do not necessarily apply to migrant workers: Bahrain's minimum wage is limited to those in the public sector, Kuwait's legislation is limited to those in the private sector[20] and Oman's minimum wage is restricted to nationals.[21] No minimum wage legislation exists in the United Arab Emirates and Saudi Arabia.

Unfortunately, even in Qatar where a minimum wage for migrant workers is promised, the legislation's effectiveness remains unclear, as wages continue to remain low and

[14] Jureidini R. Wage Protection Systems and Programmes in the GCC. European University Institute (EUI) and Gulf Research Center (GRC); 2017. https://gulfmigration.grc.net/media/pubs/rp/GLMM_EN_2017_RR01.pdf

[15] Ministerial Decree No. 739

[16] Jureidini R. Wage Protection Systems and Programmes in the GCC. European University Institute (EUI) and Gulf Research Center (GRC); 2017. https://gulfmigration.grc.net/media/pubs/rp/GLMM_EN_2017_RR01.pdf

[17]9.Tago AH. 1,441 firms shut for not complying with salary protection program. Arab News. Published October 26, 2015. Accessed July 11, 2025. https://www.arabnews.com/saudi-arabia/news/825921

[18] Policy Advisory Committee on Fair Migration in the Middle East (PAC). Minimum Wages and Wage Protection in the Arab States: Ensuring a Just System for National and Migrant Workers. International Labour Organisation; 2018:1-5.

[19] Minimum wage law is given by Law No. 17 of 2020 on Setting the Minimum Wage for Workers and Domestic Workers. Introduced in 2021, the minimum wage in Qatar is set at QR1000/USD 270 with food and accommodation provided or QR1800/USD 490 without.

[20] Minimum wage in Kuwait is set at KD75/USD 250 per month.

[21] Mukrashi A. Oman plans to raise the minimum national wage to 400 riyals. Gulf News: Latest UAE news, Dubai news, Business, travel news, Dubai Gold rate, prayer time, cinema. Published March 26, 2025. Accessed July 11, 2025. https://gulfnews.com/world/gulf/oman/oman-plans-to-raise-the-minimum-national-wage-to-400-riyals-1.500073230

stagnant or poorly enforced.[22] To be effective, minimum wage should take into account:[23]

a) The needs of workers and their families (including the general level of wages in the country, the cost of living, social security benefits, household size, number of workers per household and relative living standards of other social groups); and
b) Economic factors (including the requirements of economic development, levels of productivity, and the desirability of attaining and maintaining a high level of employment).

In addition, minimum wage setting must be evidence-based and data-driven. Data sources can be drawn from labour force surveys, household surveys, establishment surveys, and wage distribution data (based on prevailing wages in the country of destination).[24]

2.2.2 End of service indemnity benefits

Social protection has been recognised as critical to promoting internal labour mobility, reducing labour market distortions between migrant and local workers, and improving social cohesion in society.[25] In contrast, social security provided for migrant workers in Singapore remains limited to medical insurance.

Employers in the Gulf states are liable for providing end-of-service indemnity benefits (EOSI), which form the main social protection mechanism for migrant workers. Comprising lump-sum gratuities calculated based on the worker's wages, these are payable upon termination of employment.[26] Different countries have different rates in which EOSI accrues, but the amounts can be fairly substantial (see examples in Table 1 below). In Saudi Arabia, Kuwait and the UAE, the amount decreases if the employee voluntarily resigns.

However, the EOSI system in the Gulf has also been criticised as insufficient to offer any real social benefits and fall short of international standards (e.g. the ILO Social Security (Minimum Standards) Convention 1952.[27] In some cases, payments are

[22] Amnesty International. Qatar: Labour reform unfinished and compensation still owed as World Cup looms. Amnesty International. Published October 20, 2022. https://www.amnesty.org/en/latest/news/2022/10/qatar-labour-reform-unfinished-and-compensation-still-owed-as-world-cup-looms/

[23] Policy Advisory Committee on Fair Migration in the Middle East (PAC). Minimum Wages and Wage Protection in the Arab States: Ensuring a Just System for National and Migrant Workers. International Labour Organisation; 2018:1-5.

[24] Policy Advisory Committee on Fair Migration in the Middle East (PAC). Minimum Wages and Wage Protection in the Arab States: Ensuring a Just System for National and Migrant Workers. International Labour Organisation; 2018:1-5.

[25] International Labour Organisation. *Reforming End-of-Service Indemnity for Migrant Workers in Member States of the Cooperation Council for the Arab States of the Gulf (GCC)*. International Labour Organisation; 2023. https://www.ilo.org/sites/default/files/wcmsp5/groups/public/%40arabstates/%40ro-beirut/documents/publication/wcms_886159.pdf

[26] International Labour Organisation. *Reforming End-of-Service Indemnity for Migrant Workers in Member States of the Cooperation Council for the Arab States of the Gulf (GCC)*. International Labour Organisation; 2023. https://www.ilo.org/sites/default/files/wcmsp5/groups/public/%40arabstates/%40ro-beirut/documents/publication/wcms_886159.pdf

[27] International Labour Organisation. *Reforming End-of-Service Indemnity for Migrant Workers in Member States of the Cooperation Council for the Arab States of the Gulf*

jeopardised because of the company falling into bankruptcy, and insufficient or ineffective grievance mechanisms mean that workers' right to EOSI may not be fully realised. Thus, since the financial burden is placed on employers, the EOSI has been criticised as insufficient and unreliable for workers.

Oman's 2023 reforms have gained significant attention for its increased focus on social protection and inclusion. Besides featuring a creation of a national provident fund based on a risk pooling mechanism, migrant workers are included in maternity and paternity social insurance benefits, sickness and injury benefits on the same levels as Omani nationals.[28]

Additionally, Bahrain introduced a 2024 reform where the employer is required to pay to the Social Insurance Organisation a monthly contribution of 4.2 percent of the wage for the first three years of employment and 8.4 percent for the following years and until the end of service. Thus, rather than paying benefits upon departure, this reform hopes to guarantee that migrant workers receive their payments promptly.

▶Table 1. EOSI benefits and conditions by country for private sector workers (GCC) [7]

Country	Benefit	Other conditions
Qatar[8]	3 weeks per year of employment.	Contract not terminated for disciplinary reasons.
Oman[9]	15 days per year for first 3 years.	Minimum of 1 year in employment.
	1 month per year after 3 years.	
Bahrain[10]	0.5 month per year for first 3 years.	
	One month per year after 3 years.	
Kuwait[11]	15 days per year first 5 years.	Provided that the total gratuity does not exceed 1.5 years remuneration for employees paid monthly.
	1 month per year after 5 years.	If the employment relation ends because of resignation, employees are entitled to half the benefit.
	For daily, weekly, hourly waged workers: 10 days for first 5 years; 15 days for every additional year.	
Saudi Arabia[12]	0.5 month per year for first 5 years.	In case of resignation after 2–5 years: one third of benefit; 5–10 years: two thirds. Full entitlement after 10 consecutive years of service.
	1 month per year after 5 years.	Unless resignation is due to force majeure.
UAE[13]	No entitlement if service is less than 1 year. 21 days per year for first 5 years.	Total gratuity cannot exceed 2 years. In case of resignation after 1–3 years: one third; 3–5 years: two thirds.
	30 days per year after 5 years.	Full entitlement after 5 consecutive years of service.

Table 1. Variance in EOSI benefits and conditions for migrant workers across the Gulf countries. [29]

(GCC). International Labour Organisation; 2023. https://www.ilo.org/sites/default/files/wcmsp5/groups/public/%40arabstates/%40ro-beirut/documents/publication/wcms_886159.pdf

[28] International Labour Organisation. Far-reaching reforms in Oman set new benchmark for social protection in the region | International Labour Organization. www.ilo.org. Published July 20, 2023. https://www.ilo.org/resource/article/far-reaching-reforms-oman-set-new-benchmark-social-protection-region

[29] International Labour Organisation. *Reforming End-of-Service Indemnity for Migrant Workers in Member States of the Cooperation Council for the Arab States of the Gulf (GCC)*. International Labour Organisation; 2023.

2.3 Poor job mobility due to sponsored work permits

An employee cannot be considered free if exercising his right to salary would lead to his termination, which in turn is concomitant with other challenges such as paying off debts. Thus, reform of policies relating to salary payment is inadequate without worker protection over job mobility.

From the Middle East to Asia, limited job mobility is a common issue for migrant workers, strung primarily to a sponsorship system that has manufactured extreme power imbalance in an employer-employee relationship. In the Gulf, this system is generally known as the *kafala* sponsorship system (although Bahrain and Qatar have recently abolished it). While specifics differ, broad similarities in structure can be observed since the system emerged to regulate the new influx of migrant workers amidst similar historical, political and economic conditions shared by the Gulf states.

Under this system, the sponsor or the *kafeel* (citizens or local companies) is given a permit to employ foreign workers. Migrant workers are dependent on their employers to obtain, renew and cancel work permits, residency visas and their identity cards. Travel, food and accommodation costs are also covered by the employer. Should workers wish to change jobs, they have to obtain the consent of the employer. Finally, some states additionally mandate migrant workers' exits to be controlled by their employer: only earlier this month, Kuwait joined Saudi Arabia in legislating mandatory exit permits for migrant workers. This places migrant rights in greater jeopardy, as even their right to stay is subject to employer discretion.[30]

Employees have become extraordinarily vulnerable under a system that hands their legal status to their employer's discretion. Academics have critiqued this system as nothing but a permanent employment contract between the employer and employee,[31] or even a form of slavery.[32] However, the challenge of introducing reforms arises due to the conflicting appeal of preserving a stable workforce through restricting labour market mobility.

In Singapore, this employer-sponsorship system too exists, where employers are responsible for obtaining the relevant permit for the migrant worker. Depending on the skill level of the worker, different tiers of work passes exist: professionals obtain Employment Passes while semi-skilled workers have a Work Permit. Work Permit holders have limited ability to change employers without their existing employer's permission: they either have only twenty days to do so within a limited time frame towards the end of the Work Permit duration, or in the case of a breach by the employer, their request would be subject to government discretion.

https://www.ilo.org/sites/default/files/wcmsp5/groups/public/%40arabstates/%40ro-beirut/documents/publication/wcms_886159.pdf

[30] Impact International. Kuwait's Exit Permit Rule for Expat Workers: A New Era of Control or Compliance? ImpACT International. Published 2025. Accessed July 11, 2025. https://impactpolicies.org/news/495/kuwaits-exit-permit-rule-for-expat-workers-a-new-era-of-control-or-compliance

[31] Al Hammadi HM, Bayouomi KA, Rosman ASB. The Impact of Abolishing the Sponsorship System (Kafala) on the Peaceful Co-existence of Population Groups in Qatar in light of the Migration Goals of the Alliance of Civilizations. *International Journal of Academic Research in Business and Social Sciences*. 2022;12(4). doi:https://doi.org/10.6007/ijarbss/v12-i4/13068

2.3.1 Reforms across the Gulf: Abolish the sponsorship system?

Among the Gulf states, Bahrain and Qatar have already formally abolished the *kafala* system. Studies report a mixed success on whether labour rights have improved, which we explore below. It remains a contentious issue.

In 2017, Bahrain switched its *kafala* system to a new Flexible Work Permit ("Flexi-Permit") model, in which migrants can work in the Kingdom on a self-sponsorship basis. Under the new system, migrant workers take agency over their legal residency status as well as enjoy greater employment flexibility by being able to work with their employer of choice. Unfortunately, this two-year renewable permit system only saw limited success before it subsequently ended in 2022. Instead, the government took control over the sponsorship system, and labour registration centres were set up to improve monitoring and enforcement of employment laws.

In 2020, Qatar removed the requirement for migrant workers to obtain employer permission to change jobs. Specifically, workers no longer needed a "No Objection Certificate" (NOC) from their existing employer. These 2020 labour reforms[32] also prevented employers from banning employees from working in the country. While improving job flexibility for migrant workers, regulatory change met with backlash from employers. Employers began relying on non-competition clauses in the employment contract, or making absconding criminal charges, to prevent job transfer of their employees. Within the following year, the Shura Council (the nation's legislative body) recommended introducing a resignation letter requirement, one which had to be signed by the employer. This has been dubbed a 'de facto NOC' by migrant rights advocates who feared that it would undo the very benefit of the reforms.[33]

Korea's Employment Permit System (EPS) offers an alternative model to the employer sponsorship framework. Beginning 2005, the EPS is a government-funded system that has been relatively successful in achieving its objective of curbing excessive recruitment fees. The system also ensures ongoing worker protection, such as ensuring payment of minimum wage.[34] Furthermore, through using a ranking system (see table below), employers with higher points are more likely to be awarded work permits, which incentivises compliance with the law.

[32] Changes provided by Decree Law No. 18 of 2020 and Decree Law No. 19, of 2020 which amend relevant provisions of Labour Law No. 14 of 2004 and Law No. 21 of 2004 respectively.

[33] Migrant-Rights.org. A de facto NOC in Qatar? Migrant Rights. Published January 10, 2021. https://www.migrant-rights.org/2021/01/a-de-facto-noc-in-qatar/

[34] Asian Development Bank Institute, Organisation for Economic Co-operation and Development, and International Labour Organization. Building Partnerships for Effectively Managing Labour Migration: Lessons from Asian Countries. Asian Development Bank Institute (ADBI), the Organisation for Economic Co-operation and Development (OECD), and the International Labour Organization (ILO); 2019. https://www.ilo.org/sites/default/files/wcmsp5/groups/public/@asia/@ro-bangkok/documents/publication/wcms_682156.pdf

Table 2

Table 2.2: The Points System for Attributing EPS Workers to Employers, 2018

	Items included	Points
Basic Items (100 points total)	• the ratio of foreign workers employed to the number permitted	22.430
	• ratio of foreign workers whose re-employment contracts have expired/total number of foreign employees	22.430
	• the number of new foreign workers requested	1,920 points
	• the number of people (natives) hired from employment centers during the labor market test	1,420 points
Bonus Points	• full enrolment/payment of return cost insurance and accident insurance of all foreign employees	1
	• establishment and operation of quality dormitories[a]	3
	• employers' completion of training for workers[a]	2
	• no workplace accidents for 5 consecutive years	1
Penalties	• violated any law according to the enterprise guidance and inspection results of the previous year	−0.1 to −0.3
	• failure to pay for departure guarantee insurance on time	−0.5 to −2 per worker, up to 5
	• EPS workers have left due to: (non-cumulative)	
	▸ Sexual violence	−5
	▸ Verbal/physical abuse, sexual harassment	−3
	▸ violation of working conditions	−3
	• Death of a foreign worker in the previous two years	−2

EPS = Employment Permit System.

Note: [a] Points attributed for manufacturing sector are lower, 0.5 for housing and 0.2 for training. Points are attributed for 2 years maximum.

Source: Ministry of Employment and Labor.

Table 2. Points system within South Korea's Employment Permit System.[35]

Unfortunately, agents still take advantage of loopholes by charging exorbitant prices for pre-employment fees (e.g. preparing for the language exam). Other issues include poor job match quality, evident in the fact that 60% of workers change jobs within a year.[35]

Besides a government-funded system, other alternatives proffered include an optional sponsorship system, where migrants can choose an employer-sponsorship setting or not. This may be desired by migrants who may find the employer-sponsored option a cheaper option.[36]

2.4 Access to justice

Having assessed the various aspects of the migrant worker journey in which they are systematically denied of their rights, we now assess the various remedial processes available to the migrant worker across the different jurisdictions. Workers should have access to appropriate and effective dispute resolution without fear of retaliatory measures (such as blacklisting, detention or deportation).[37]

Generally, available types of grievance mechanisms can be classified as: state-based judicial mechanisms, state-based non-judicial mechanisms and non-state-based grievance mechanisms (see Table 3).

[35] Korea Development Institute, World Bank. *Understanding Employers' and Workers' Needs : Employment Permit System in Korea.*; 2019. https://documents1.worldbank.org/curated/en/099340112152162220/pdf/P168563029ed0e0f08fab03614168c193f.pdf

[36] Al Hammadi HM, Bayouomi KA, Rosman ASB. The Impact of Abolishing the Sponsorship System (Kafala) on the Peaceful Co-existence of Population Groups in Qatar in light of the Migration Goals of the Alliance of Civilizations. *International Journal of Academic Research in Business and Social Sciences*. 2022;12(4). doi:https://doi.org/10.6007/ijarbss/v12-i4/13068

[37] International Labour Organisation. *General Principles and Operational Guidelines for Fair Recruitment & Definition of Recruitment Fees and Related Costs*. Fundamental Principles and Rights at Work Branch, Labour Migration Branch; 2019.

Table 3

Type of grievance mechanism	Examples of activities conducted
State-based judicial mechanisms	● Access to labour courts ● Access to legal aid
State-based non-judicial mechanisms	● Investigate human rights and labour abuses ● Facilitate mediation and conciliation processes ● Promote regional dialogue and cooperation
Non-state-based grievance mechanisms	● Company-led grievance mechanism, particularly those that are formed through agreement with trade unions ● See the Responsible Business Alliance's Worker Voice Platform, which promotes labour conditions in supply chains through tools like worker surveys, mobile apps and grievance reporting mechanisms

Table 3. Points system within South Korea's Employment Permit System.[38]

Challenges faced by migrants in navigating the justice system can also exacerbate the power imbalance already inherent in the employer-employee relationship. These include language barriers in accessing systems predominantly based in the official language of the host state,[39] a lack of awareness of their legal rights, and lengthy procedures which may deter migrants with limited finances. Finally, underreporting remains an issue as the fear of retaliation, termination or repatriation generally prevents victims from speaking up.[40]

[38] Christy UNH, Kumsa K, Namgyal K, Sirois S. *Labour Migration, Business and Human Rights*. Watson Institute for International and Public Affairs, Brown University Accessed July 12, 2025. https://www.ohchr.org/sites/default/files/documents/issues/business/workinggroupbusiness/cfis/labour-migration/subm-labour-migration-business-aca-1-brown-university.pdf

[39] Siddiqui K. Language barriers plague Bangladeshi migrant workers, shrink paychecks. The Business Standard. Published December 27, 2023. https://www.tbsnews.net/bangladesh/migration/language-barriers-plague-bangladeshi-migrant-workers-shrink-paychecks-765274

[40] Christy UNH, Kumsa K, Namgyal K, Sirois S. *Labour Migration, Business and Human Rights*. Watson Institute for International and Public Affairs, Brown University Accessed July 12, 2025. https://www.ohchr.org/sites/default/files/documents/issues/business/workinggroupbusiness/cfis/labour-migration/subm-labour-migration-business-aca-1-brown-university.pdf

III. Analysis: What drives progress in improving migrant rights?

Only Bahrain, Kuwait and Oman have legalised trade unions for migrant workers,[41] and even then trade unions have largely been excluded from decision-making processes or banned from participating in political activities. In other countries such as Qatar, Saudi Arabia and the UAE, the right to form and join trade unions is exclusive to nationals. While a global migrant rights coalition (the 'Coalition on Labor Justice for Migrants in the Gulf') has been established earlier this year for workers in the Gulf states[42] which marks good progress, more time is required to demonstrate how effective such a global trade union will be.

Given the market competition among labour-source states,[43] it is unlikely that Bangladesh as a labour-source state possesses the political will or the negotiating power[44] to advocate for stronger rights protections for its migrant workers. Rather, the state has an interest in preserving the status quo in order to ensure it continues to benefit substantially from remittance inflows, which represent nine times the value of the foreign direct investment and seven times that of foreign aid.

3.1 International pressure

Increased public scrutiny of migrant rights practices in Qatar followed FIFA approval in 2010 for Qatar to host the 2022 FIFA World Cup, particularly given the predominant reliance on migrant labour to construct the sport-related infrastructure. Various migrant rights reports critiquing the country's treatment of its low-wage migrant workers emerged. One even reported that 6,500 migrant workers died in the process of construction. Most of these deaths were attributed to extreme working conditions, including exposure to high temperatures and poor sanitation facilities for migrants.[45] In 2014, international trade unions submitted a complaint at the International Labour Organisation (ILO) against Qatar regarding non-compliance with labour standards.[46]

[41] International Labour Organisation. Realizing a Fair Migration Agenda: Labour flows between Asia and Arab States. In: *ILO Regional Office for Arab States, Beirut and ILO Regional Office for Asia and the Pacific*. International Labour Organisation; 2015. Accessed July 12, 2025. https://www.ilo.org/sites/default/files/wcmsp5/groups/public/@arabstates/@ro-beirut/documents/meetingdocument/wcms_323910.pdf

[42] Equidem. Press Release – Labor Rights Groups Launch "Coalition on Labor Justice for Migrants in the Gulf" – Equidem. Equidem.org. Published March 7, 2025. Accessed July 13, 2025. https://equidem.org/press-release-labor-rights-groups-launch-coalition-on-labor-justice-for-migrants-in-the-gulf/

[43] Siddiqui T. *International Labour Migration from Bangladesh: A Decent Work Perspective*. International Labour Organisation; 2005. Accessed July 12, 2025. https://www.ilo.org/sites/default/files/wcmsp5/groups/public/@dgreports/@integration/documents/publication/wcms_079174.pdf

[44] Ainul S, Haque E, Santhya KG, Rob U. Assessment of Overseas Labor Migration Systems in Bangladesh.; 2022. Accessed July 12, 2025. https://knowledgecommons.popcouncil.org/cgi/viewcontent.cgi?article=2797&context=departments_sbsr-pgy

[45] https://lkyspp.nus.edu.sg/docs/default-source/case-studies/freedom-of-mobility.pdf?sfvrsn=3fb6690a_4

[46] Complaint alleging non-observance by Qatar of the Forced Labour Convention, 1930 (No. 29), and the Labour Inspection Convention, 1947 (No. 81), made by delegates to the 103rd Session (2014) of the International Labour Conference under article 26 of the ILO Constitution, 16 March 2015, Appendix I, p. 3- 7,

This complaint was made under Article 26 of the ILO Constitution. As public awareness grew, calls were also made to boycott the FIFA World Cup tournament.[47]

Following the 2014 complaint to the ILO, Qatar has seen the following reforms:

- 2014: the Supreme Committee for Delivery and Legacy (the Supreme Committee) launched the Workers' Welfare Standards which aim to protect the rights of migrant workers engaged on projects under the control of the Supreme Committee associated with the hosting of the FIFA World Cup.
- 2015: Qatar repealed the kafala sponsorship system (Law No. 21)
- 2017: Qatar repealed the exit permit requirement in Law No. 1. Qatar also established two national committees under the Ministry of Labour, the Labour Dispute Resolution Committee (to simplify and improve dispute resolution processes) and the National Committee to Combat Human Trafficking. After a high-level ILO visit in 2016,[48] Qatar committed to a three-year technical cooperation programme co-designed with the ILO in 2017 to strengthen national labour regulations to be aligned with international standards, thereby setting closure to the 2014 complaint. This programme focused on wage protection and minimum wage, labour inspection, occupational safety and health, workers' representation and grievance mechanisms.
- 2018: ILO opened an office in Doha, Qatar.
- 2019: the Ministry of Labour, with the support of the ILO, launched an initiative to create joint migrant worker-management committees.
- 2020: Qatar removed the requirement for a No-Objection Certificate (Law No. 18) which dispensed the need for migrant workers to obtain employer permission
- 2020: Qatar introduced a minimum wage law for workers

As Saudi Arabia prepares for the next hosting of the 2034 FIFA World Cup, it is hoped that international pressure will similarly induce cross-cutting reforms for migrant rights. Just last month, trade unions from 36 countries filed a complaint against the Kingdom at the International Labour Organisation.[49]

3.2 International instruments

International treaties and conventions are useful in setting standards. Some such instruments also have built-in review mechanisms to monitor progress, though these are often designed as peer review mechanisms involving other signatory States.

https://www.ilo.org/wcmsp5/groups/public/---ed_norm/---relconf/documents/meetingdocument/wcms_348745.pdf
https://www.ilo.org/resource/conference-paper/gb/331/complaint-concerning-non-observance-qatar-forced-labour-convention-1930-no

[47] Dougall DM. FIFA and Qatar "rattled" as European World Cup boycott gathers pace. euronews. Published November 10, 2022. https://www.euronews.com/2022/11/10/fifa-and-qatar-rattled-as-european-world-cup-boycott-gathers-pace

[48] https://www.ilo.org/resource/news/ilo-governing-body-welcomes-qatars-commitment-bolster-migrant-worker-rights-0

[49] Pattisson P, MacInnes P. Unions from 36 countries protest over treatment of migrant workers in Saudi Arabia. The Guardian. Published June 4, 2025. Accessed July 12, 2025. https://www.theguardian.com/football/2025/jun/04/unions-32-countries-protest-over-treatment-migrant-workers-saudi-arabia

3.2.1 Dhaka principles for migration with dignity

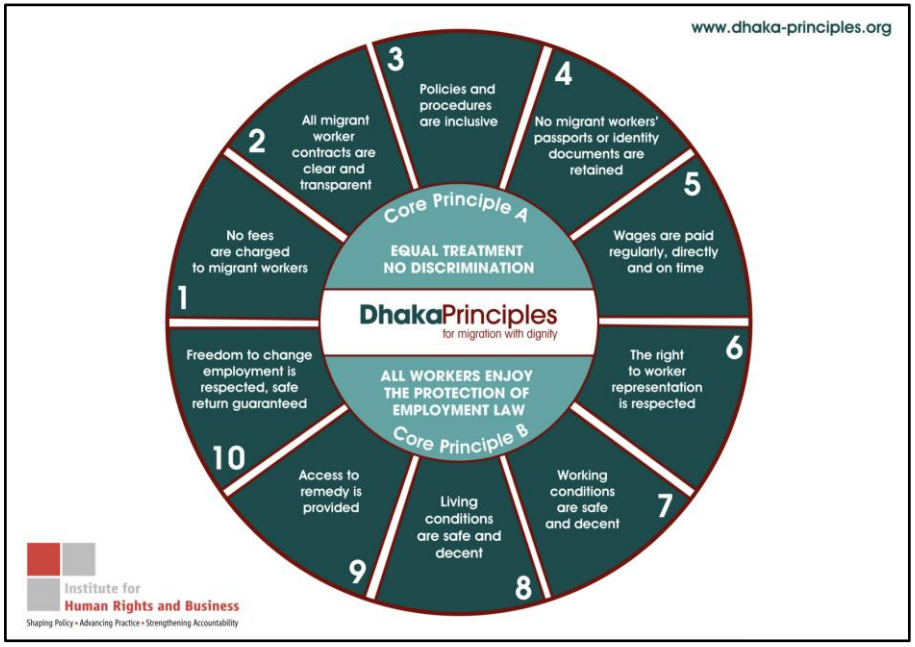
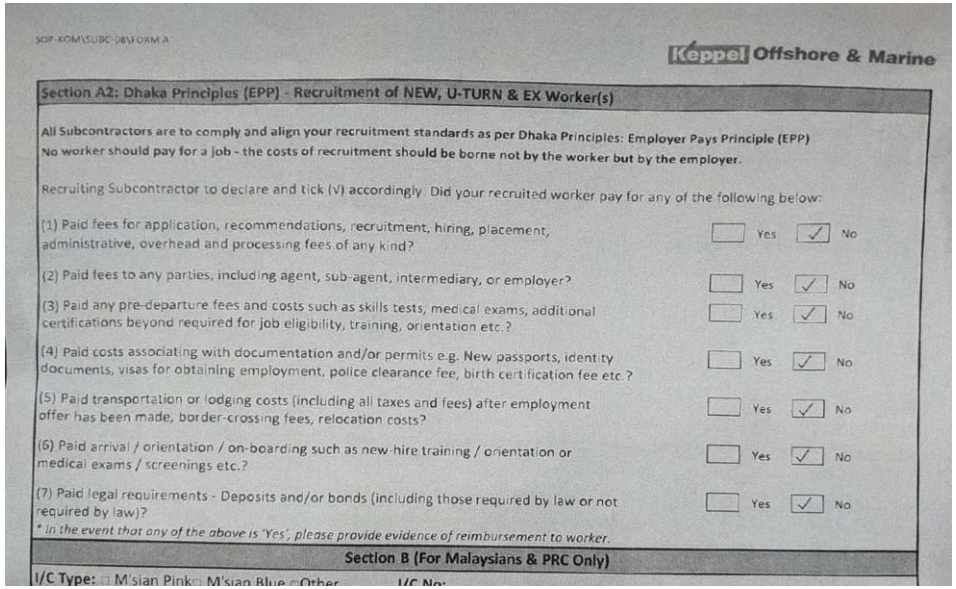


Figure 1. Dhaka Principles for migration with dignity.[50]

Developed by the Institute for Human Rights and Business in 2011, the Dhaka Principles for migration with dignity are a set of ten principles to promote the responsible recruitment and employment of migrant workers.

Last year, TWC2 encountered a worker possessing such a document referencing these principles, however as these were contained in a document between the contractor and subcontractor (no copy for the worker) full understanding of the agreement was not made available to the migrant worker. Nonetheless, the fact that such principles are already incorporated in practice is an indication of progress.



SOP-KOM\SUBC-DB\FORM A

Keppel Offshore & Marine

Section A2: Dhaka Principles (EPP) - Recruitment of NEW, U-TURN & EX Worker(s)

All Subcontractors are to comply and align your recruitment standards as per Dhaka Principles: Employer Pays Principle (EPP)
No worker should pay for a job - the costs of recruitment should be borne not by the worker but by the employer.

Recruiting Subcontractor to declare and tick (√) accordingly. Did your recruited worker pay for any of the following below:

(1) Paid fees for application, recommendations, recruitment, hiring, placement, administrative, overhead and processing fees of any kind?	☐ Yes	☑ No
(2) Paid fees to any parties, including agent, sub-agent, intermediary, or employer?	☐ Yes	☑ No
(3) Paid any pre-departure fees and costs such as skills tests, medical exams, additional certifications beyond required for job eligibility, training, orientation etc.?	☐ Yes	☑ No
(4) Paid costs associating with documentation and/or permits e.g. New passports, identity documents, visas for obtaining employment, police clearance fee, birth certification fee etc.?	☐ Yes	☑ No
(5) Paid transportation or lodging costs (including all taxes and fees) after employment offer has been made, border-crossing fees, relocation costs?	☐ Yes	☑ No
(6) Paid arrival / orientation / on-boarding such as new-hire training / orientation or medical exams / screenings etc.?	☐ Yes	☑ No
(7) Paid legal requirements - Deposits and/or bonds (including those required by law or not required by law)?	☐ Yes	☑ No

** In the event that any of the above is 'Yes', please provide evidence of reimbursement to worker.*

Section B (For Malaysians & PRC Only)

I/C Type: ☐ M'sian Pink ☐ M'sian Blue ☐ Other I/C No:

Figure 2. Picture of a document signed between the main contractor and subcontractor relating to the hiring of a migrant worker.[51]

[50] Dhaka Principles. Dhaka Principles - for migration with dignity. dhakaprinciples.org. https://dhakaprinciples.org/

[51] TWC2. Seven checkboxes on page two. Transient Workers Count 2. Published August 11, 2024. Accessed July 12, 2025. https://twc2.org.sg/2024/08/12/seven-checkboxes-on-page-two/

3.2.2 International Labour Organisation Conventions

International standards are crucial for migrant rights since they do not distinguish between workers based on nationality. In fact, several international standards actively promote the equality of treatment, such as ILO Convention No. 102 which stipulates non-discrimination clauses and promotes occupational injury protection for non-nationals. Furthermore, international institutions can offer critical resource support and guidance to countries and organisations within to integrate these international standards and best practices into the law.[52]

The Appendix provides a review of the different international instruments under the ILO that may be applicable to migrant workers. The author notes that ILO Convention 29 and Convention 105 have gained approval by all the Gulf states.

3.2.3 Bilateral agreements

Bilateral labour agreements are legal agreements between states regulating migration flows between them.[53] Strong state-state cooperation between the source and destination countries is paramount in order to ensure protection of the rights of their nationals throughout their labour migration journey. Thus, bilateral agreements should cover the entire migration journey comprising the identification of job opportunities, applying for visa, pre-departure training, post-arrival orientation and finally returning to the country of origin.[54] Furthermore, the Agreement should outline the division of responsibilities for the signatory states, recruitment agents, employers and workers.[55]

Additionally, the ILO Multilateral Framework on Labour Migration presents a series of non-binding principles and guidelines that advocate for bilateral and multilateral agreements. For example, Guidelines 2.3 and 2.6 state:

> Guideline 2.3: "promoting, where appropriate, bilateral and multilateral agreements between destination and origin countries addressing different aspects of labour migration, such as admission procedures, flows, family reunification possibilities, integration policy and return, including in particular gender-specific trends;"
>
> Guideline 2.6: "promoting bilateral and multilateral agreements between workers' organizations in origin and destination countries providing for the exchange of information and transfer of membership".

Finally, ILO Convention No. 97 promotes the conclusion of bilateral labour agreements between states that have strong migration flows. Its accompanying ILO Recommendation No. 86 has a model bilateral agreement in its Annex. This model agreement contains 29 articles that should be considered in formulating migration agreements, including information and assistance for migrants, social security and contracts of employment.

[52] https://www.ilo.org/sites/default/files/2024-10/Global_report_master_combinated_web.pdf

[53] https://thedocs.worldbank.org/en/doc/3ab0cffdc2e4621f8b5a70a0410213d5-0050062023/original/Bangladesh-case-study-FORMATTED.pdf

[54] https://migrationnetwork.un.org/sites/g/files/tmzbdl416/files/resources_files/blma_guidance_final.pdf

[55] https://bangladesh.iom.int/sites/g/files/tmzbdl1006/files/documents/report-mapping-of-recruitment-practices-in-bangladesh_iom_jan-2020.pdf

Research conducted by a thematic working group led by the ILO and IOM has laid down principles, criteria and operational guidelines in which stakeholders can assess existing practices on bilateral labour migration agreements (BLMAs) and promote regulatory development. At its most fundamental, this technical resource stipulates that BLMAs should comprise human rights safeguards (including equality of treatment and access to justice mechanisms), fair and ethical recruitment of migrants, access to information, occupational safety and health, social and wage protections.[56]

3.2.4 Memoranda of Understanding

Like bilateral agreements, Memoranda of Understanding (MOUs) are also executive agreements aiming to regulate the movement of migrant workers, but they possess a less formal nature which may make them a preferred option for some countries due to their flexibility.[57,58] Presently, Bangladesh has signed MOUs with several Gulf countries including Saudi Arabia, Kuwait, the United Arab Emirates and Qatar. While organised at the state-to-state level, non-governmental organisations (NGOs) may also help to facilitate the signing of such agreements. For example, between 2012-2013 the NGO Migrant Forum Asia facilitated the signing of bilateral MOUs between the National Human Rights Committee of Qatar and the National Human Rights Commissions in Nepal, Philippines and Sri Lanka.

However, the mere signing of an MOU does not necessarily symbolise progress. First, conditions stipulated within the MOU may fall short of international standards, or the MOU may be simply a lightweight "indicative framework" given its non-legally binding nature.[59] Thus, besides ensuring the text of agreements is publicly accessible,[60] the process of making or implementing the BLMAs should closely involve civil society organisations as well, who can help in disseminating information to migrant workers.[61]

However, observers have also argued that the effectiveness of such MOUs are limited, and it would make better sense to place our faith in multilateral and regional frameworks instead.

---

[56] International Labour Organisation. *Guidance on Bilateral Labour Migration Agreements*. United Nations Network on Migration; 2022:1-82. Accessed July 12, 2025. https://migrationnetwork.un.org/sites/g/files/tmzbdl416/files/resources_files/blma_guidance_final.pdf

[57] Bossavie L. *Low-Skilled Temporary Migration Policies: The Case of Bangladesh*. World Bank; 2023.

[58] International Labour Organisation. *Review of the Effectiveness of the MOUs in Managing Labour Migration between Thailand and Neighbouring Countries*. ILO Regional Office for Asia and the Pacific; 2015.

[59] Wickramasekara P, Ruhunage L. *Good Practices and Provisions in Multilateral and Bilateral Labour Agreements and Memoranda of Understanding*. International Labour Organisation ; 2018.

[60] Wickramasekara P, Ruhunage L. *Good Practices and Provisions in Multilateral and Bilateral Labour Agreements and Memoranda of Understanding*. International Labour Organisation ; 2018.

[61] International Labour Organisation. *Guidance on Bilateral Labour Migration Agreements*. United Nations Network on Migration; 2022:1-82. Accessed July 12, 2025. https://migrationnetwork.un.org/sites/g/files/tmzbdl416/files/resources_files/blma_guidance_final.pdf

3.2.5 Regional consultative processes

Regional Consultative Processes (RCPs) on Migration are informal regional meetings of states.[62,63] The two main processes are The Colombo Process and the Abu Dhabi Dialogue.

The Colombo Process

Established in 2003, the Colombo Process focuses on the management of overseas employment and contractual labour. Comprising twelve member states (almost all labour-sending countries) and eight observer countries, the aims of the ministerial forum include sharing experiences, lessons learned and best practices in overseas employment as well as enhancing dialogue between labour-source and labour-receiving countries.[64] The forum has made some progress in carrying out policy studies, training courses, regional workshops and data sharing.

The Colombo Process also demonstrates how the creation of international frameworks can be harmonised with national-level initiatives. Through implementation of the Comprehensive Information and Orientation Programme (CIOP), the Colombo Process aims to ensure that standardised orientation programmes for migrant workers are given to support workers' migration journey. The CIOP features pre-departure orientation programmes to educate workers on a range of topics, including the economic, social and political context of the destination country, dominant languages used in the destination country, as well as labour and immigration laws.[65]

The Abu Dhabi Dialogue (ADD)

Established in 2008, the Abu Dhabi Dialogue (ADD) is a forum for dialogue and cooperation between Asian countries of labour origin and Gulf states (destination countries). At the Third Ministerial Consultation of the ADD, the 2014 Kuwait Declaration saw states pledge to "work together to prevent and sanction exploitative recruitment practices that place workers at great risk and undermine their fundamental rights". Today, four work streams make up the ADD: (a) Comprehensive Information and Orientation Programming (CIOP); (b) Strengthening Joint Country of Origin (COO) and Country of Destination (COD) Government Oversight and Monitoring of Recruitment Practices; (c) Certification and Mutual Recognition of Skills; and (d) The Future of Domestic Work in the Gulf.

---

[62] Bhatta N, Balasubramaniam J. *Freedom of Mobility: The Paradoxes*. Lee Kuan Yew School of Public Policy; 2018. Accessed July 13, 2025. https://lkyspp.nus.edu.sg/docs/default-source/case-studies/freedom-of-mobility.pdf?sfvrsn=3fb6690a_4

[63] Wickramasekara P, Ruhunage L. *Good Practices and Provisions in Multilateral and Bilateral Labour Agreements and Memoranda of Understanding*. International Labour Organisation ; 2018.

[64] High Commission of India. Multilateral Cooperation: Colombo Process. Hciseychelles.gov.in. Published 2025. Accessed July 13, 2025. https://www.hciseychelles.gov.in/multilateral-co-operation.php

[65] Global Compact for Migration. The Colombo Process. In: *Second Asia-Pacific Regional Review of Implementation of the Global Compact for Safe, Orderly and Regular Migration*. United Nations Economic and Social Commission for Asia and the Pacific (UNESCAP) and the Regional United Nations Network on Migration for Asia and the Pacific; 2024. Accessed July 13, 2025. https://migrationnetwork.un.org/system/files/docs/Guiding%20questions%20-%20response%20Colombo%20Process.pdf

IV. Conclusion

Migrant rights remain largely tightly controlled by employers and governments across the Gulf states – in many respects not unlike Singapore. In particular, the conspicuous absence of these states in ratifying many legally binding ILO Conventions demonstrates that countries are not ready to implement stronger rights for migrant workers in line with international standards. The same can be said for Singapore which, likewise, has only signed on to three core ILO Conventions, numbers 29, 105 and 155.

In 2020, the Guardian newspaper reported a Ugandan worker saying of Qatar's new labour law which ended its *kafala* system: "[The reforms] are a good move, though they are long overdue. The bad thing is that no one monitors the implementation of laws here and many workers don't know the laws, so employers can easily cheat them."[66] Based on this author's internship experience with TWC2, this expressed sentiment reflects the ground reality of many Bangladeshi workers in Singapore too. Due to inaccessibility created by language barriers, constraints on finances and limited leisure time, most workers are generally unfamiliar with the full length of their rights under Singapore's employment law. Thus, beyond a critique of migrants' legal rights under different jurisdictions, an essential step that should also accompany should be effective communication of these laws to migrant workers.

[66] Pattisson P. New employment law effectively ends Qatar's exploitative kafala system. the Guardian. Published September 1, 2020. https://www.theguardian.com/global-development/2020/sep/01/new-employment-law-effectively-ends-qatars-exploitative-kafala-system

V. References

Constant, A. F., Zimmermann, K. F., & Edward Elgar Publishing. (2013). International handbook on the economics of migration. Edward Elgar Pub. Ltd.

How will foreign workers know how much they have to pay the Singapore employment agency (Ea)? (n.d.). Ministry of Manpower Singapore. Retrieved 10 July 2025, from https://www.mom.gov.sg/faq/employment-agencies/how-will-foreign-workers-know-the-amount-that-they-are-expected-to-pay-the-singapore-ea\

Jones, E. C., & Faas, A. J. (Eds.). (2017). Social network analysis of disaster response, recovery, and adaptation. Butterworth-Heinemann.

Rahman, M. (2017). Bangladeshi migration to Singapore : a process-oriented approach. Springer.

VI. Appendix

Name of international instrument	Contents	Ratified countries (Scope limited to Bangladesh, Singapore, Gulf states)
ILO Convention No. 181 Private Employment Agencies Convention	● Provides a framework for effective and transparent regulation of private employment agencies to protect workers against unethical or abusive practices ● Prohibits private employment agencies from charging recruitment fees to workers in general ● Protects workers who use these agencies against discrimination (e.g. ensuring minimum wage, working time and conditions) ● Protections for migrant workers, ● Protect employers from unfair competition	None
ILO Convention No. 97 Convention concerning Migration for Employment	● Promotes creation of Bilateral Labour Agreements between states ● Provide a framework for origin, transit and destination countries to avoid exploitative migrant recruitment practices, enhance skills training and job matching, and portability of social security entitlements	None
ILO Convention No. 143 Convention concerning Migrations in Abusive Conditions and the Promotion of Equality of Opportunity and Treatment of Migrant Workers	● Recognises the need to ensure respect of human rights of all migrant workers, including those in an irregular situation ● Prevent all forms of irregular migration in abusive conditions faced by migrant workers	None
ILO Convention No. 29 Convention concerning Forced or Compulsory Labour	● To suppress the use of forced or compulsory labour in all its forms within the shortest possible period ● ILO has also designed 11 indicators of forced labour (e.g. including deception, restriction of movement, isolation and more)	Bahrain, Singapore, Oman, Qatar, Saudi Arabia, United Arab Emirates, Kuwait
ILO Convention No. 105 Convention concerning the Abolition of	● Bans certain forms of forced labour still allowed under the Convention concerning Forced or Compulsory Labour (e.g. punishment for strikes and as a punishment for holding certain political views)	Bahrain, Bangladesh, Oman, Qatar, Saudi Arabia, United Arab Emirates, Kuwait Note: Singapore

Forced Labour		ratified the Convention in 1965, but denounced the Convention in 1979.
ILO Convention No. 111 Convention concerning Discrimination in Respect of Employment and Occupation	● Promotes non-discrimination of migrant workers in employment and occupation based on race, colour, sex, religion, political opinion, national extraction, or social origin.	Bahrain, Saudi Arabia, Kuwait
1990 International Convention on the Protection of the Rights of All Migrant Workers and Members of Their Families	● Aims to foster respect for migrant human rights and guarantee equality of treatment for migrants and nationals	Bangladesh
ILO Convention No. 95 Protection of Wages Convention	● Form and method of wage payment ● Freedom of workers to dispose of their wages ● Duty to provide information ● Wage guarantees ● Enforcement (e.g. implementing laws capable of ensuring adequate supervision and effective sanctions	Saudi Arabia
	or remedies)	
ILO Convention 87 Freedom of Association and Protection of the Right to Organise	● The right of both employers and employees to join an organisation of their choice and free from any influence of authorities	Bangladesh, Kuwait