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Riyals, Dinars, and Dirhams: Political Inclusion of Migrant Workers in GCC Member States

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Riyals, Dinars, and Dirhams: Political Inclusion of MigrantWorkers in GCC Member States

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Submitted in partial fulfillment of Honors Requirements for the Department of Political Science

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Note about Translations and Transliterations

Many sources utilized for this study come from either the governments of these Arabian Gulf states or NGOs within the region. As such, some are translated or transliterated from their original Arabic by non-native English speakers or, in some cases, the primary document is written by a non-native English speaker. As such, a number of sources provide useful information despite grammar or usage errors. Where appropriate, these sources will be used with [sic] notation or with note of the proper contextual meaning as necessary for clarification.
I. Introduction

"The strongest bond of human sympathy outside the family relation should be one uniting working people of all nations and tongues and kindreds."—Abraham Lincoln

Immigration for Labor

As globalization continues to flourish and the transportation of goods and people becomes increasingly easier, transnational migration for labor purposes is a growing industry in North America, Europe, and the Middle East. In the Middle East, particularly, labor migration has experienced a growth explosion over the past century. As the region became synonymous with oil wealth and the Arab version of the “American Dream”, migrant workers were needed to extract and refine oil, assist with construction projects to accommodate the growing population, and work in service industries to augment the jobs already being performed by citizens.

In the United Arab Emirates, foreign workers constitute approximately 95 percent of the total workforce (and between 80-85 percent of the total population) and, as of 2005, number 2,738,000. 1 Following the August 2, 1990 Iraqi invasion of Kuwait and the subsequent reorganization of the oil-rich nation, a number of foreign workers entered the country to enjoy newly expanded political and social freedoms. 2 Unfortunately, accurate and consistent statistics regarding these populations are difficult to obtain and various reporting sources provide dramatically different numbers regarding nationality breakdown within populations in the Arabian Gulf.

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This is due to the record-keeping policies of many of these states and the discrepancies between external observers and internal records. According to the Central Intelligence Agency’s July 2009 estimates, Kuwait (which is slightly smaller than the size of New Jersey) has a population of 2,692,526 citizens and 1,291,354 non-nationals, who account for roughly one-third of the population. However, according to the U.S. State Department’s Background Note on Kuwait, July 2008 estimates purported that the small emirate was comprised of 1.05 million Kuwaiti citizens and 2.34 million non-Kuwaiti nationals—a very different proportion. Kuwait conducts a census every ten years, the most recent of which was conducted in 2005. It registered a population of 2,213,403 Kuwaitis and 1,332,629 non-Kuwaitis residing in the country, more closely matching the statistics reported by the Central Intelligence Agency. Saudi Arabia (which is about one-fifth of the land area of the United States), is comprised mostly of Saudis, with a total population of 28,686,633, 5,576,076 of whom are non-nationals, according to the CIA. The United Arab Emirates (approximately the size of Maine), comprised of seven emirates, registered a population of 4,798,491 in its own 2005 census. This wealthy and diverse country has grown rapidly in the past half-decade, however, and in 2009 its population topped six million, 1.75 million of whom hail from India, 1.25 from Pakistan, 500,000 from Bangladesh, 1 million from other

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Asian communities (including China, the Philippines, Thailand, Korea, Afghanistan, and Iran), as well as 50,000 Western expatriates.  

This study focuses on the factors that influence the sustainability and quality of life of migrant worker populations and why the level of political inclusion—as evidenced by rights realized by workers—differs so greatly. The research question rests on the relative importance of non-state institutions and international actors in determining political inclusion, as defined by not simply the existence of rights as afforded by law, but the ability of migrant workers to actually realize the benefits of these rights. Political inclusion could be demonstrated by the existence of voting rights, ease of requirements for citizenship or naturalization, possibility of labor group membership, and lack (or presence) of human rights violations in migrant worker communities. For the purpose of this study, I will focus primarily on the treatment of migrant workers by measure of inclusion, not those which are legislatively afforded but not realized. These rights will serve as my dependent variable (explained further in research design), as they are more effectively measured and reported. Actors such as NGOs and foreign states and corporations will be considered for their impacts. Examples of such actors include the United Nations, Gulf Cooperation Council (GCC), labor unions (and similar groups in states where unions are banned), and foreign governments.

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8 UAE Interact, “Expat numbers rise rapidly as UAE population touches 6m,” UAE Interact. http://www.uaeinteract.com/docs/Expat_numbers_rise_rapidly_as_UAE_population_touches_6m/37883.htm
9 For the purpose of this study the terms migrant worker, guest laborer, and immigrant worker will be considered interchangeable and, when possible, referred to solely as migrant worker for consistency. A “migrant worker,” according to international law, is someone who is engaged in “remunerated activity in a State of which he or she is not a national.” This definition is taken from the International Convention on the Protection of the Rights of All Migrant Workers and Members of Their Families (Migrant Workers Convention), adopted December 8, 1990, G.A. Res. 45/158, annex 45 U.N. GAOR Supp (No.49A) at 262, U.N. Doc A/45/49 (1990), entered into Force July 2, 2003, article 2, section 1.
Political Inclusion of Migrant Workers

I attempt to answer the question, "What causes higher levels of political inclusion in some states than others?" Is it the degree of influence that nongovernmental organizations have within the country? Is it the sheer size and scope of the workforce? Or does international penetration, through wars or trade, compel states to adopt different institutions and legislation that improve the conditions of migrant workers? Based on the histories of the three cases, these are some potential variables that influence the degree of political inclusion of migrant workers.

This study postulates that it is in fact predominantly the vigor of civil society and secondarily international penetration that account for differences between the three cases, as of the cases studied the best working conditions and rights afforded to workers exist in Kuwait, which was greatly influenced by international penetration during and following the 1990 invasion by Iraq also has a vibrant civil society as evidenced by NGO presence. The United Arab Emirates has also been exposed to international penetration via trade and connections to foreign governments. This penetration comes through active expatriate communities and programs in the sectors of business and education that link UAE to countries in the West and elsewhere. Saudi Arabia, by contrast, has little exposure to international influence as it intentionally retains tight borders and does not actively seek to implement foreign values. While there is some international investment in Saudi-run projects, Saudi Arabia does not aggressively promote or host foreign businesses. The relative levels of political inclusion for migrant workers in these three states, as evidenced by rights legislatively afforded and conditions of work and living, does not completely co-vary with the degree of exposure to international penetration within the states, although migrant
workers in Kuwait enjoy the greatest relative degree of freedom and legal protection and highest degree of international penetration.

Current studies in the field of migrant labor focus primarily on human rights abuses, such as poor working conditions, long hours, unfair or disproportionate wages, the restrictions on female workers, and physical abuse in the workplace (both on worksites and in domestic labor arrangements). Organizations such as Human Rights Watch and Freedom House monitor levels of political freedom and respect for human rights within a state but generally lack information and analysis about non-nationals and non-state actors, in part because of restrictions placed on the dissemination of this information by the governments of these states. Many such analyses focus on the rights afforded to citizens and permanent residents. However, in the Arabian Gulf states few migrant workers are ever afforded the opportunity to achieve a comparable level of political inclusion to that of citizens, thus making it difficult to analyze these differences. As a result, many studies on the subject neglect to fully address the issues surrounding migrant workers in regards to political involvement, access to justice, and civil rights.

*Why Study Migrant Workers?*

The implications of this study are two-fold. First, the question of how migrant workers are or are not politically included is worthy of exploration, particularly considering gaps in the existing literature regarding labor rights in a cross-national comparison in the GCC. A literature review follows, offering insight into current scholarship on the subject. Secondly, the results of such a study point to methods that can be used to streamline the process of political inclusion for migrant workers and improve quality of life through an exploration of what methods work best in various societies. One implication is to question...
whether actions by state actors are the strongest influence in determining the political climate for foreign workers. For example, with the finding that civil society is the most influential factor, one might make a policy recommendation that states such as Saudi Arabia be encouraged to loosen restrictions on the formation and action of NGOs and labor unions.

**Cases**

For the purpose of this thesis, the focus is member states of the GCC, specifically the United Arab Emirates, Saudi Arabia, and Kuwait. The GCC, or as it is formally titled, The Cooperation Council for the Arab States of the Gulf, was first organized in 1981 to create a powerful cooperative organization within the Arabian Gulf for political and economic purposes. Goals of the GCC include formulating similar regulations in fields such as economy, finance, trade, customs, tourism, legislation, and administration; encouraging scientific and technical development in industry, mining, agriculture, water and animal resources; creating new scientific research centers; acting as a unified military presence; fostering cooperation in the private sector; and strengthening relationships and ties between their peoples. Most recently and controversially, the GCC has been striving to establish a common currency among its member states by 2010. There are currently six member states—Kuwait, Saudi Arabia, United Arab Emirates, Bahrain, Qatar, and Oman—two of which (UAE and Oman) opted out of the Monetary Union (and thus the campaign for a common currency) in 2009 and 2007, respectively. Of these six states, those which seem most relevant for this study are Kuwait, Saudi Arabia, and the UAE because Bahrain, Qatar,

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11 Ibid.
13 Ibid.
and Oman do not host as large or influential migrant worker populations in terms of size or scope of work.

**Labor Migration in the Gulf: A Brief Historical Overview**

With the 1933 founding of Aramco through a concessionary agreement between the Saudi Arabian government and Standard Oil Company of California, a number of foreign workers flowed into the oil-rich country to gain opportunities for employment and prosperity. Even after the 1980 nationalization of Aramco, workers continued to flock to the corporation from all over the world. Over time, large migrant groups arrived in Saudi Arabia from displaced Italian communities in Eritrea, Syria, and many poor South and Southeast Asian nations, such as Pakistan and Bangladesh to complete a diverse array of jobs, from oil-related industry to service jobs including hairdressing and landscaping.

The time frame for this paper is primarily the early-twentieth through early twenty-first century, including the Oil Embargo period of the 1970s, subsequent crisis, development of the GCC, and various more recent conferences and NGO reports on human rights and the conditions for workers. While this study primarily focuses on current trends, historical events and factors will be included. Although this paper is not primarily a study of changes over time, such changes will be included to illustrate differences between the cases.

Migration for labor purposes began in the Arabian Gulf region as early as the beginning of the 20th century. In the 1938-1939 personnel records of Aramco (its fifth year of operation), the overall number of staff as well as the percentage of whom were foreign

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14 This oil company is now called Saudi Aramco, since the 1980 nationalization. Aramco served as an acronym for “Arab American Oil Company” but is now officially called by its full name to illustrate and emphasize the Saudi takeover. For the purpose of this paper I will refer to the corporation solely as Aramco, for consistency over time and simplification.

-11-
workers was rapidly increasing. In January 1938 Aramco employed 541 Saudi Arabs, 56 Americans, and 38 “other foreign employees”. This number skyrocketed to 2,942 Saudi Arabs, 256 Americans, and 106 other foreign employees one year later in January 1939. By 1978, Aramco employed 17,445 Saudi Arabs, 1,241 U.S. and Canadian citizens, 1,097 UK citizens, 2,814 Asian/Other Arabs. Today, Aramco boasts over 54,000 employees worldwide from over 50 different nationalities, making the largest employer in Saudi Arabia a transnational organization of sorts, while now officially under the purview of the Saudi government.

The United Arab Emirates, while not as oil-rich as Kuwait and Saudi Arabia, has gained prosperity as a leader in the world of technology, real estate, and education. Since gaining independence in 1971, this country has grown tremendously and provided opportunity for business expansion as financial institutions, foreign universities, and real estate companies set up shop in the region. This oasis of luxury in the Arabian Gulf has become synonymous with extravagance and the Arab version of excess. With more relaxed rules regarding decency and the role of women in some emirates and the immense tax incentive, it is not surprising that many Europeans and Americans opted to adopt an expatriate lifestyle in the UAE. However, as revenue-generating industries expanded, there became a greater need for workers in labor and service jobs—particularly construction. As such, the UAE has become a dichotomous state with great wealth and great poverty within a predominantly expatriate population.

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19 Ibid.
20 Aramco, “Monthly Summary of Total Number Personnel: Saudi Arabs, Americans, and other Foreign Employees,” Dhahran: Aramco, 1938
Sources

While the migrant worker or guest labor populations share great similarities, there are some differences for which different source material will be used as appropriate. For example, in the Saudi Arabian case, a single (formerly multinational and now transnational) corporation is the primary employer of foreign workers—Aramco (which employees 45,000 in the Kingdom, followed by BAE Systems, the global defense and security systems company which employees roughly 5,000 employees, most of whom are foreign)\(^{22}\). Documents produced by Aramco, such as a monthly magazine, are widely available and provide insight into both company policies and external factors. William E. Mulligan, a long-time employee of Aramco, provides many of these documents. During his four-decade tenure with the company, Mulligan wrote for many publications and amassed an impressive collection of advertisements, articles, brochures, and other materials related to the development of Aramco and the evolving partnership with the Saudi government. Additional sources include Gulf Cooperation Council agreements regarding issues such as state-worker relations, publications released by NGOs about the state of guest laborer conditions within GCC member states, U.S. Department of State reports and documents, as well as previous research by scholars such as Robert Vitalis, who have extensively studied the social and political implications of oil wealth on citizenship and life within parts of the region.

Theoretical Framework

I start the thesis with a literature review that summarizes relevant scholarship on migrant workers in GCC member states as well as civil society and political inclusion. In the research design, I focus on three independent variables that help account for the disparate

level of political inclusion in each respective state. These variables are exposure to international penetration, the role of nongovernmental organizations and their influence (such as breadth and depth of issues covered by NGOs, their ability to elicit change, and the responsiveness of the government to issues tackled by these organizations), and size and scope of migrant worker population. I address these independent variables in a variable-by-variable comparison. I apply a "Most Similar Systems" approach, which is appropriate for questioning why political inclusion differs across cases by focusing on one dependent variable and studying some of the independent variables for possible conclusions.
II. Literature Review

Much of my study relies on primary sources, particularly existing labor law. These decrees and documents provide a legislative framework for political, economic, and social facets of the lives of migrant workers. However, existing literature also provides insight into the question of political inclusion of migrant workers in the Middle East and theories surrounding this question. Existing literature on the question of migrant workers in the Middle East focuses predominantly on the shortcomings of current legislation, whether it is unequal protection or insufficient regulation or reform of a much-maligned sponsorship system. Scholars such as Vitalis and Lockman have studied labor in the Middle East from different lenses, offering perspectives on the lives of migrant workers in the region. However, current literature largely lacks analysis of the factors which most influence the varying degrees of political inclusion for these workers.

Human Rights Practices Reports

One source of existing literature that is relevant to the study of workers' conditions in a given country is the U.S. Department of State's annual Country Reports on Human Rights Practices. These reports are narrative analyses of the year's events, legislation in the region, and statistical data. These comprehensive yearly reports are mandated by the U.S. Congress via the Foreign Assistance Act of 1961 and Trade Act of 1974, which mandate that the Secretary of State must provide "a full and complete report regarding the status of internationally recognized human rights... in countries that receive assistance... and in all other foreign countries which are members of the United Nations" to the Speaker of the
House of Representatives and the Committee on Foreign Relations. While none of the three states surveyed in this study voted in favor of the Universal Declaration of Human Rights, they are all expected to uphold certain standards of human rights based on this declaration and other international law. These Human Rights Practices Reports assess the level of adherence to such international standards for the treatment of citizens and non-nationals. The 2008 Human Rights Reports (HRR) for Saudi Arabia, Kuwait, and the UAE focus predominantly on human rights abuses that occurred throughout the year.

**Freedom House Reports**

Freedom House, a private non-profit U.S.-based watchdog group, was established in 1941 in response to perceived threats against peace and democracy. The goal of Freedom House is to “promote freedom throughout the world” and as part of that mission they produce annual Freedom in the World reports, which relative assessment scores and with accompanying narratives of the year past in the studied country in terms of freedom and human rights. They score countries for political rights and civil liberties on a 1-7 scale, 1 being the most free and 7 being the least free. From this, states are ranked as free, not free, or partly free. In 2009, Saudi Arabia and UAE were ranked “not free” and Kuwait was designated as “partly free.” Freedom House is criticized by some for employing a sort of “Arab exceptionalism,” as it often points to democratic deficits in the region and places states

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24 Kuwait and the UAE were not voting members of the United Nations in 1948 and Saudi Arabia was one of eight abstaining votes  
27 Ibid.  
28 Ibid.
in the category of "not free". Additionally, the information provided by Freedom House serves more as framework for the dependent variable, the level of political inclusion, rather than the independent variables and potential answers to the research question.

Kuwait

The HRR on Kuwait also discussed the prevalence and reach of NGOs, saying the government used its power to license associations as a means of political control. There were 73 officially licensed NGOs in the country, including a bar association, professional groups, and scientific bodies. The Ministry of Social Affairs and Labor (MOSAL) did not license any new NGOs during the year, compared with one licensing the previous year and seven the year before. At year's end there were 149 NGOs pending licensing by the MOSAL; many have been waiting years for approval.

Freedom House's country report on Kuwait notes that the state's emir dissolved the National Assembly in March 2008 in response to rising political tensions. Furthermore, the government passed (but quickly revoked) a law banning public demonstrations and assemblies. These two temporary setbacks for political freedom come after a step toward freedom in 2006 when the parliamentary elections included female voters (and candidates). Freedom House also points out that unlike the UAE, which has a diversified economy, Kuwait continues to rely almost exclusively on oil for its economy—with 90 percent of public revenues generated from oil in 2008.

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32 Ibid.
33 Ibid.
34 Ibid.
United Arab Emirates

Human Rights Watch reports that police in Dubai and Abu Dhabi stated that nongovernmental organizations (NGOs) and the International Committee of the Red Cross had access to observe prison conditions if requested. However, on September 21, when members of the NGO Emirates Human Rights Association went to visit female inmates at Dubai's Al-Aweer Detention Facility, prison authorities denied the monitors access "to protect the prisoners' social and psychological rights." The HRR for the UAE also notes that while it is illegal, it is customary for employers to retain foreign employees' passports to gain additional control over them.

The UAE was rated "not free", but with slightly better scores than Saudi Arabia (a 6 and a 5, respectively, for UAE). In 2006 the UAE held its first-ever elections for half of their 40-seat Federal National Council. Women were permitted to be members of the electoral college that chose the council members and one of the twenty seats was filled by a female. Unlike Kuwait and Saudi Arabia, the UAE benefits from a diverse economy. The country has a free-trade zone in Dubai and a large manufacturing industry in Sharjah as well as an ongoing real estate boom. Freedom House and others point to this as a positive attribute of not only the Emirati economy but culture and society as well. This real estate boom, however, has contributed to the problem surrounding the treatment of workers, particularly migrant laborers who survive under poor working and housing conditions.

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36 Ibid.
38 Ibid.
39 Ibid.
Human Rights Watch (HRW) also provides reports which provide analysis of current events, legislation, and institutions. HRW focuses, as the name implies, predominantly on human rights issues and violations. A recent HRW document makes the claim that perhaps it is not the government that has influence over the condition of workers. In an interview with the NGO, Abdulla Saeed Saif Bin Sulom Alfalasi, head of the Work Permit Department in the Ministry of Labor in the United Arab Emirates, said, "In many cases it is expat employers who are violating the workers [sic] rights... We have set up a hotline for workers to report complaints. What more can we do? We are not angels." Unfortunately, HRW reports that the federal government maintains no comprehensive data about labor dispute cases.

Mohammad Saleh Al Madani, from the Civil Cases Unit of Dubai Court, criticizes this lack of statistics saying, "though there are a huge number of labor disputes, there is neither any statistical record nor any data on the nature of those disputes... The labor cases ruled upon by the courts pertained to refusal to pay salaries, end of service benefits, tickets and suspensions without notification..." Human Rights Watch also assessed the 2007 labor law draft put forth by the government of the UAE, finding gaps in areas such as reformation of the sponsorship system, protection of women, and expansion of greater rights to non-nationals. Such assessments of current and prospective laws are common in reports published by HRW.

**Saudi Arabia**

The HRR for Saudi Arabia praised some improvements over the year, noting an increase in publicly available information concerning specific instances of official corruption or of government action against corruption; no reports that authorities confiscated personal religious materials from individuals at ports of entry; and a process developed by the

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40 Human Rights Watch interview with Abdulla Saeed Saif Bin Suloom Alfalasi, February 22, 2006
41 Agarib, "Labor Ministry under fire over labor disputes," *Khaleej Times*
government for prenuptial agreements when the wife is a noncitizen, permitting her to travel without her husband's permission.\(^42\)

Saudi Arabia has a status of "not free" according to the 2009 report and scored the worst, a 7, for political rights.\(^43\) In response to a series of terrorist attacks in the country in 2003 and 2004, the Saudi government tightened the reins on both nationals and non-nationals, killing many suspected terrorists. Freedom House assesses that reform is supported in Saudi society, but not embraced within the royal family, as they would likely have to part with some of their political power to expand personal and political freedom for citizens.\(^44\)

Robert Vitalis’ book, *America’s Kingdom*, is considered by some scholars and journalists to be the definitive academic manual on Aramco, the Arab oil-boom of the 20\(^{th}\) century, and the American experience in Saudi Arabia with the development of an oil-based economy and establishment of an American foothold in the region. Vitalis begins with a history of Aramco, starting with the establishment of operations in Dhahran.\(^45\) He says these operations “rested on a set of exclusionary practices and norms that were themselves legacies of earlier mining booms and market formation in the American West and Southwest. This was a system of privilege and inequality, which we know as Jim Crow in the United States and Apartheid in South Africa, and as racism more generally.”\(^46\) He points the establishment of laws that forbade Saudis from living with their families, the deportation of Americans who pursued relationships with nearby Arab families, and an inefficient and inappropriate model


\(^{44}\) Ibid.

\(^{45}\) Robert Vitalis. *America’s Kingdom: Mythmaking on the Saudi Oil Frontier*. (Stanford, California: Stanford University Press, 2006), i

\(^{46}\) Ibid., xiii.
of justice on the compound. As noted in his study, documentation and analysis of these problems is sorely lacking. Vitalis specifically illustrates the lack of record-keeping about the movement to challenge the hierarchy in oil camps, beginning with the first noteworthy strike by Saudi workers in 1945. Such a hierarchy is still engrained in oil camp culture.

Much of Vitalis’ research was dependent on the collection of papers amassed by William E. Mulligan, available at the Special Collections Library at Georgetown University. William E. Mulligan joined Aramco’s Government Relations Department in 1946, just a few years after the founding of the corporation. Mulligan worked a number of positions with the company and in his early years he worked primarily with George S. Rentz, the noted Arabist who worked to increase Aramco’s knowledge of the technology, art, and culture of Saudi Arabia. He wrote for several Aramco publications and provided insight as a long-term employee of the company who lived and worked through various trends of migration, political climates, and leadership teams.

Some scholars say that the history of Aramco is also the history of modern Saudi Arabia, as Aramco officials worked closely with the newly established Saudi government to support important activities such as the creation of transportation and communications infrastructures, development of boundaries and tackling of other foreign relations issues, national education, health care and administration. Aramco was charged with the task of

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47 Ibid.
49 Mulligan was involved with boundary work for the Saudi Arabian government in the 1940’s and early 1950’s. Mulligan went on to serve as coordinator of the Arabian Affairs Division, manager of the Government Affairs Services Department, secretary of the Donations Committee, assistant to the vice president, and a staffer in the Government Affairs division during his time with Aramco.
learning the language, culture, politics, geography, and history of the Saudis and did so with great precision, creating countless reports on all aspects of Saudi Life.\textsuperscript{52} As such, the collection of documents Mulligan accumulated over his decades with the company provide an insight into all aspects of life on a compound, including the development of standards for foreign workers, suggestions of what women moving to Saudi Arabia should bring for their domestic comfort, advertising strategies for American publications to promote interest in Aramco jobs, how Aramco proposed handling the strikes of the 1940s, and responses to international events. Mulligan shows how Aramco created a haven or Little America in the deserts of Saudi Arabia to provide comfort for foreign workers. However, today the workers expand far beyond simply American professionals and engineers to include also laborers who do not enjoy such comforts. As Mulligan starts to point out near the end of his tenure, many day laborers and hourly wage earners are living outside the compound in the adjacent towns, deprived of the benefits of life on a compound. This remains true today.

Zachary Lockman, professor of Islamic Studies at New York University, is a leading expert on labor in the Middle East from the 19\textsuperscript{th} century onward. While he does not focus solely on migrant workers, he has researched the history of labor in the region, class consciousness, collective action, and the histography of working classes in various Middle Eastern countries.\textsuperscript{53} Lockman emphasizes labor productivity with the development of working-class consciousness. He has studied how working classes come together to create more efficient labor populations. This is interesting as working class consciousness and the organization of labor is discouraged in two of the three states studied in this paper. Much of Lockman’s research revolves around the development of these collective groups and, as such,

\textsuperscript{52} Ibid.
is relevant to policy recommendations for the development of organized labor in GCC member states.

III. Research Design

This study applies the framework of historical institutionalism for the purpose of analysis of political histories within the region through a Most Similar Systems (MSS) comparison. Charles Tilly points to historical institutionalism as a framework appropriate for measuring "big structures, large processes, and [making] huge comparisons". Historical institutionalism focuses on institutions to gather information about trends of social, political, and economic behavior throughout history. This comprehensive comparative approach does not rely solely on the study of state institutions, but other human organizations as well, such as labor unions and non-governmental organizations (NGOs).

The histories of these three cases are similar—with experiences as trucial states, similar development of regimes, and experience with colonialism leading to economic and technological development as well as subsequent accumulation of wealth. Because of these similarities, a historical explanation does not provide enough reasoning as to why the three have very different levels of political inclusion of workers from foreign states. The difference between the inclusion of workers in Kuwait and Saudi Arabia illustrates a need to analyze why these are in stark contrast, despite somewhat similar histories. I propose that civil society is the factor most responsible for political differences between states within this relatively homogeneous region.

55 Ibid.
56 Trucial states is a term most commonly used when referring to the Trucial States of Oman, now called the United Arab Emirates. Trucial states are most commonly formed through a truce or treaty between a ruling power, such as Great Britain, and the local government—in this case, sheikhdoms. Many trucial states became protectorates prior to achieving independence.
Civil society is often defined to include such components as activist groups, sports and social clubs, community organizations, trade unions, religious groups, NGOs, and other voluntary civic and social organizations. The London School of Economics says that:

"civil society refers to the arena of uncoerced collective action around shared interests, purposes, and values. In theory, institutional forms are distinct from those of the state, family and market, though in practice, the boundaries between state, civil society, family and market are often complex, blurred and negotiated."\(^{57}\)

The level of activity of civil society is often constrained by government regulation, as is the case in many Arabian Gulf states.

**Most Similar Systems**

A MSS research design is most applicable to studying questions about political inclusion of migrant workers in the Arabian Gulf. Timothy Lim, author of *Doing Comparative Politics* and professor at California State University in Los Angeles, describes this design as the matching up and comparing of two or more systems that share a "whole range of similarities," including political, social, demographic, economic, and cultural.\(^{58}\) To best determine the factors involved in creating low but differing levels of political inclusion in the Middle East, one must utilize a method that investigates cases for which there are already similarities to distinguish what differences are the most influential. GCC member states present substantively interesting cases because of their wealth and reliance on migrant workers. They are also readily comparable since there is a relatively high degree of homogeneity in the region. Saudi Arabia, Kuwait, and the UAE share many similarities which make these states appropriate cases for an MSS study.

\(^{57}\) London School of Economics Centre for Civil Society, "What is civil society?," London School of Economics. http://www.lse.ac.uk/collections/CCS/what_is_civil_society.htm
\(^{58}\) Timothy Lim. *Doing Comparative Politics: An Introduction to Approaches and Issues*. (Boulder: Lynne Rienner Publishers, 2006), 34
While the MSS design provides a number of advantages, it also carries some notable limitations. Most obvious of which is the inability to prove complete causality. As King, Keohane, and Verba say, research design decides "how to pose questions and fashion scholarly research to make valid descriptive and causal inferences." However, limitation exists with all methodological designs. The structure of independent and dependent variables provide a reliable comparison of factors to figure out which co-vary and may imply causality. As Lim explains, "In methodological terms, the important point is that the characteristics the systems share in principle can be held constant and can therefore be considered irrelevant in explaining a particular social or political phenomenon (the dependent variable)." In other words, if Country X and Country Y share a common language, currency, and population size, but have drastically different immigration rates, the immigration rates would be the dependent variable.

The differences identified between the countries, such as a civil war in one and not the other, are considered the independent variables. The independent variable is what is considered as a potential causal factor. Most multi-case comparisons contain several independent variables which may or may not be entirely causal. Przeworski and Teune state that to make broadly applicable conclusions, one must consider cases that share economic, cultural, and political similarities, such as Scandinavia (Sweden, Norway, Finland) or two-party Anglo-Saxon comparisons (US and Britain). A comparison across Arabian Gulf states with similar degrees of wealth, a dominant Muslim culture, and autocratic governments

60 Timothy Lim. *Doing Comparative Politics: An Introduction to Approaches and Issues*. (Boulder: Lynne Rienner Publishers, 2006), 34
61 Ibid, 35.
would pass Przeworski and Teune’s test. As Lim notes, in the Most Similar Systems design it is the meaningful differences that matter.

**Case Similarities**

As Lim notes, similarities must be emphasized as well. The three states all came into being in the 20th century and two (Kuwait and the UAE) gained independence from colonial powers and share legacies as trucial states. This important political background plays a role in the development of the states in their modern incarnations. Additionally, all three states are non-democratic and afford residents a relatively low degree of personal freedom (according to a Western standard).

Islamic influence is also dominant across the cases. Kuwait follows Sharia (Muslim-centered) law even given the notable non-Muslim minority in the country. Kuwait is 85 percent Muslim (70 percent Sunni and 30 percent Shia) and 15 percent “Other” (including Christian, Hindu, and Parsi). Saudi Arabia also has Islam as its official state religion and it is illegal to convert from Islam to another religion (2008 HR Report). Non-Muslims are also not permitted to erect houses of worship. Official statistics do not exist for Saudi Arabia as the state purports that the population is entirely Muslim. The United Arab Emirates, while largely populated by non-nationals, releases statistics that report a population that is 96 percent Muslim (16 percent Shia) and 4 percent “Other”.

While these three states are dissimilar in population size (with UAE and Kuwait being significantly smaller than Saudi Arabia), they have backgrounds as colonial states and

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their current governments came into being in the 20th century. Modern Saudi Arabia was established in 1932 under the House of Saud. Before 1971, the United Arab Emirates was known as the Trucial States or Trucial Oman, in reference to a two century-old truce between the Britain and Arab Sheikhs. The current political system was established under the 1971 Constitution, after UAE gained its independence from the United Kingdom. Kuwait, too, became only fully independent in the 20th century. The United Kingdom and the then-emir Abdullah Al-Salim Al-Sabah exchanged notes in 1961 which established an independent Kuwait, thus ending sixty years as a treaty-based British protectorate.

Another similarity among these three cases is the nationalization of industry. Kuwait's oil wealth attracted many foreign workers following the founding of the Kuwait Oil Company (KOC) as a joint venture between the Anglo-Persian Oil Company (now known as British Petroleum or BP Amoco) and the Gulf Oil Corporation (GOC) in 1934. The first oil was exported from this newly-rich nation in 1946. In 1980 the Kuwait Petroleum Corporation (KPC) was created to consolidate all oil companies within the country. As recently as March 12, 2010 KPC was actively consolidating existing smaller oil corporations to improve economic benefits and create a sort of multi-corporation organization in which the individual companies still retain some independence. KOC, the largest member of KPC and now fully Kuwaiti government-owned, was initially nearly destroyed after the Iraqi invasion, but subsequently rebuilt after the U.S. intervention. As such, jobs were lost but

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66 St. John Philby. Arabian Oil Ventures, Washington: Middle East Institute, 1964
70 ------, “Kuwait to merge oil firms into one company,” MENAFN March 12 2010
rapidly recreated and the company expanded, providing numerous opportunities for migrant workers.

While much of the industry in UAE is non-national and regulated through international corporations, the oil industry is one area in which all three are nationalized. The United Arab Emirates’ largest corporation for oil extraction and refining is the Abu Dhabi National Oil Company (ADNOC). ADNOC was established in 1971, immediately following UAE independence.\(^1\) In Saudi Arabia, Aramco serves as the sole oil company in the state, processing and refining all oil exported. Kuwait, too, has several nationalized oil corporations, all of which fall under one regulatory body. This sort of national industry provides not only a standard of practices that can be compared, but also large markets for foreign labor. This also points to an additional similarity, the presence of great oil wealth. The majority of the world’s oil reserves come from the Arabian Gulf and these three states are three of the richest in terms of natural resource quantity.

**Dependent Variable: Rights of Migrant Workers**

The dependent variable is rights actualized—not those legislatively afforded to—migrant workers. In other words, the dependent variable is not what the government says workers have a right to (such as a minimum wage, access to arbitration) if the law is not enforced and employers abuse the system, but what rights migrant workers actually have in practice. As described in the introduction, political inclusion is measured by factors such as voting rights, ease of obtaining citizenship or naturalization, possibility of labor group (union) membership, and lack (or presence) of human rights violations within the migrant worker communities at the hands of supervisors or employers. Condition is a compound

variable, made up of two factors—the rights afforded to workers in theory and the degree to which they are able to exercise these rights. The rights afforded include all that is protected legislatively. The ability to exercise these rights includes access to services and justice, human rights abuses (or lack thereof), conditions of work, and general living conditions within the state as a non-citizen and laborer.

*Intervening Variable: Legal Framework*

The legal framework associated with labor in these three cases serves as an intervening variable. The intervening variable “intervenes” or connects the dependent and independent variable, better explaining the relationship between dependent and independent. In this study, the legal framework, specifically the labor laws of the three cases, serves to illustrate the connection between the degree of rights actually realized by migrant workers and the factors which influence this. The legal framework serves as a foundation for the rights actualized, but does not entirely dictate the condition of workers.

*Independent Variables in Selected GCC Member States*

In the cases of Saudi Arabia, Kuwait, and the United Arab Emirates there are three distinct independent variables of interest considered here. They are the exposure to international penetration, the influence of nongovernmental organizations in the country, and the size and scope of the migrant worker population.

*International Penetration*

One factor to study for its influence on political inclusion of migrant workers in the region is international penetration—including through war, trade, and other partnerships. This can be measured through visa requirements, the scope of international media in the country, foreign investment, and the activity of international corporations. International
penetration can come in many forms, including deployment of troops, and the investment of capital.

One factor that particularly distinguishes Kuwait from the other two cases is the international intervention following the 1990 Iraqi invasion of Kuwait under Saddam Hussein. This conflict thrust Kuwait into the global scene. In August 1990, the United Nations Security Council placed sanctions on Iraq, starting the international movement toward supporting Kuwait.\(^{72}\) In January 1991 the U.S. Congress voted for war in Iraq, joining others and increasing the global involvement in the oil-rich state. Oil was a main concern during the conflict, as many of the state’s oil fields were burned and infrastructure was destroyed.\(^{73}\) The invasion of Kuwait and subsequent rebuilding also highlight a vulnerability of the ruling family, opening a space for challenge from outsiders (including Kuwaiti citizens, NGOs, and foreign governments). And while some in the West consider American influence to be a largely positive intervention, it has been shown with both the Aramco experience and the rebuilding of Kuwait that often American influence is not wholly positive.

The UAE, too, has much experience with international penetration—albeit from a different angle. Many corporations have set up branches in these rich emirates, offering opportunities for luxurious expatriate lifestyles, and encouraging a real estate boom. With tax incentives that are attractive to European and American markets, a number of Fortune 500 corporations exist in the UAE and major universities such as Cornell are setting up international campuses in Abu Dhabi and Dubai. Rather than through conflict, the UAE has


exposure to international penetration through trade and education, as the Emirates offer a number of opportunities for wealth and growth outside of the traditional oil industry. Institutions such as Rochester Institute of Technology, Harvard University, and the Sorbonne in Paris have established branch campuses in the Emirates and American-style universities such as the American University of Dubai and American University of Sharjah thrive.

Saudi Arabia, however, keeps its borders rather tightly sealed. While there have been American troops stationed on the Arabian Peninsula at different points throughout history, the influence foreign states and organizations have in the country is minimal. The requirements for entering Saudi Arabia are stringent enough to prevent large-scale American (or other foreign) influence. The royal family is reluctant to allow outsiders any significant influence in the country and because it holds so much oil wealth, dependence on foreign governments is minimal.

**NGO Influence**

The influence of nongovernmental organizations also plays a role in political inclusion and must be considered as an independent variable. Furthermore, NGO influence can serve as a proxy for the vigor of civil society as a whole. From states such as Kuwait which allow for the formation of NGOs and financially support a number of them to Saudi Arabia, where NGOs are largely impermissible and tightly regulated, different degrees of influence and freedom are permitted throughout the Arabian Gulf. NGOs across the three cases are comprised almost entirely of citizens, eliminating membership possibility for migrant workers in most instances. Some NGOs offer reports on human rights violations, criticisms of ruling families (as allowed), and informational narratives about current events

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74 Consular and Travel Services, "Visa Requirements," Royal Embassy of Saudi Arabia, http://www.saudiembassy.net/services/visa/default.aspx
while others focus on Islamic charity, endowments for science and technology, or political endeavors. International NGOs (such as Amnesty International, Human Rights Watch, and others) offer important outsider viewpoints on these states but are frequently forced to report from outside the borders. In states which permit the formation of local or national NGOs, other statistics and information are often available. With the growth of NGOs in Kuwait and the relaxation of some laws regarding private life in the country, the relative importance of locally-formed, native NGOs has grown, providing a new and significant view that has been historically lacking. Most of these NGOs (particularly the international examples), however, are not comprised of migrant workers.

**Size and Scope of Migrant Worker Population**

The size and scope of the migrant worker populations across these three cases differs somewhat but are more similar than their counterparts in the other three GCC member states. The United Arab Emirates, as earlier noted, is comprised predominantly of non-nationals and the workforce is almost entirely non-Emirati (95 percent). This is in contrast to Saudi Arabia, which has a much larger population overall, but a smaller percentage of the workforce from outside of the country. Kuwait falls somewhere in the middle, with conflicting statistics estimating that between 30-60 percent of the workforce is foreign. All three gain much of their migrant worker population from South and Southeast Asia. However, non-national Arabs are also a popular source of labor in the more oil-rich states.

For the purpose of this study, I employ a cross-national variable-by-variable approach rather than case-by-case. Through the study of various primary and secondary sources, I compare the legislative infrastructure as well as third-party assessments of the independent variables in the three states.
IV. Empirical Findings

Legislative infrastructure provides a framework within which migrant workers live and work. While the time frame for establishing standing labor law in these countries differs, some of the content of the laws are similar. However, the differences are apparent and range from nuances to radical divergences. This study of law combined with analyses of rights actualized provides information regarding the level of political inclusion for the three cases, as shown in Figure 1.

<table>
<thead>
<tr>
<th>Figure 1: Dependent Variable- Rights Actualized by Migrant Workers</th>
</tr>
</thead>
<tbody>
<tr>
<td>Kuwait</td>
</tr>
<tr>
<td>Rank among three cases</td>
</tr>
<tr>
<td>Degree of rights actualized</td>
</tr>
</tbody>
</table>

As study of these rights illustrates, there also is not a direct correlation between rights afforded legislatively and the rights actually realized by workers in these three states. Figure 2 illustrates these key differences and points to the variation between rights afforded and rights actualized.
Kuwait relied on an arguably outdated and old-fashioned law created in 1964 until new legislation was adopted to increase workers' rights in 2009. In Saudi Arabia, labor law was reformed in 2007. In the United Arab Emirates, the Federal Law No. 8 of 1980 is the basis for existing labor standards, making it the oldest (and arguably most outdated—illustrating the static nature of legislative framework in the country) of the three states. A draft of a new labor law was proposed in the UAE in 2007 but failed to muster the support of workers, employers, or legislators. Figure 3 illustrates divergences in labor law among the three cases and specific labor laws are explained in more detail.
Labor Law in Kuwait

Until recently Kuwait based much of its labor law on a piece of legislation that was penned over 45 years ago. The updated legislation came after nearly ten years of debate and revision in the National Assembly, following a call by citizens and legislators alike to update the outdated law to provide greater protection for the growing worker population and adapt to the needs of this long-changed population.75 The Labour Law of Kuwait, or Law no. 38/1964 was, prior to the adoption of the updated 2009 law, the basis for modern labor disputes, treatment of workers, and expectations of employers.76 This law excluded “temporary and casual workers” engaged for a period not exceeding six months as well as private servants and government workers who were contracted according to the special employment regulations for Indians and Pakistanis.77

While the 1964 law lacked in protection in some regards, it did however say “no young person” of either sex below age of 14 shall be employed, but persons between 14 and 18 can under certain conditions.78 It also provided provisions that meant to be for the protection of women (although they may be perceived as limiting freedom). Chapter six states that no women shall be employed during night except in hospitals, private clinics and other institutions which will be notified by the Ministry of Social Affairs and Labour.79 Furthermore, women could not be employed in dangerous industries and trades “harmful to the health”.80

76 Labour Law of Kuwait, Law no. 38/1964
77 Ibid.
78 Ibid., chapter 5
79 Ibid., chapter 6
80 Ibid.
Maternity leave was also outlined in this law, stating that pregnant women shall be entitled to leave with full pay for 30 days preceding and 50 days following delivery. They were also eligible for a maximum of 100 days without pay—subject to the production of a medical certificate with the same effect, provided a women [sic] who enjoyed the privilege of maternity leave shall not [be] entitled for the annual leave in the same year." Interestingly, a female worker was also eligible for equal remuneration to that of a man for the same work. The "remuneration" means the basic pay with allowances, benefits, commission and periodic gratuities or bonuses usually paid to a worker.

Several adaptations were made in the new legislation adopted in 2009. This new law expanded rights afforded to foreign workers but retained the controversial sponsorship system, in which all non-nationals must be sponsored by an employer to maintain residence in the country. The bill was passed unanimously and was praised for its improvements, based on criticism that the existing legislation favored employers and was notably lacking in protection for workers. The new legislation provides better annual leave and an end to service indemnities as well as tougher penalties for employers who break the law. The law also takes a large step by instituting a minimum wage for certain jobs—40 dinars (150 dollars) for cleaners and 70 dinars (261 dollars) for security guards. Despite these great strides, critics surmise that not all employers will comply and that unless the new regulations are strictly enforced, abuses against migrant workers will continue at their current frequency. While the newly-adopted legislation does not provide a reform of the sponsorship system, despite nation-wide protests in early 2009, Minister of Social Affairs and Labour Bader al-

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81 Ibid.
83 Ibid.
84 Ibid.
Duwaila has said that the Kuwaiti government is considering and investigating alternatives to change this system.\textsuperscript{85}

**Labor Law in the UAE**

While Kuwait and Saudi Arabia have both recently updated their labor laws, UAE still relies on Federal Law No. 8 of 1980 as its national labor law. UAE labor law states that the official language for all government documents shall be Arabic and its provisions are not applicable to government employees (who have a different set of labor laws), domestic workers, or workers in agricultural fields.\textsuperscript{86} This legislation leaves many migrant workers unprotected.

This labor law allows for arbitration of labor disputes and legal recourse through the court system if disputes are unable to be resolved.\textsuperscript{87} However, the law does not afford the same rights to citizens and non-nationals. It specifically states that work is the right of UAE nationals and others may not be employed except as provided in the legislation if there is a non-availability of citizen workers.\textsuperscript{88} Furthermore, preference is given for positions both in the private and public sectors first to UAE citizens, then Arab non-Emiratis, and lastly other non-nationals (such as Bangladeshi or Pakistani), who actually comprise the majority of the Emirati workforce.\textsuperscript{89}

As in Kuwait, agents and suppliers of non-national laborers often cause disputes and issues. This labor law requires that agents must apply for licenses, which may be renewed annually, and may not receive any commission or material reward in consideration before or

\textsuperscript{85} Ibid.
\textsuperscript{86} Federal Law No. 8 of 1980
\textsuperscript{87} Ibid.
\textsuperscript{88} Ibid.
\textsuperscript{89} Ibid.
after the rewarding of a job. Expenses may only be collected as decided by the Ministry of Labour and Social Affairs, as outlined in articles 17 and 18. However, many who study the region point to issues of price-gouging for these agency services. Human Rights Watch points to the exorbitant fees these recruiting agencies charge, which range between $2,000-$3,000 per worker. Many migrant workers have to take out loans to afford the cost of even finding employment in the Middle East.

As with labor law in other GCC states, there is a provision prohibiting women from working at night and they may not be employed in jobs that are “hazardous, harmful, or detrimental to health or morals, and in such other jobs as may be decided...” Maternity leave with full pay is provided for 45 days including time before and after delivery as long as the female employee has worked for the company for at least one year; if not, she is entitled to half pay. This is in contrast to the greater period of time afforded in other states. However, this law also provides for nursing breaks for mothers of children up to 18 months old.

Federal Law No. 8 of 1980 also outlines guidelines for remuneration for work completed. Payment must occur at least once per month and a worker must be paid typical pay plus 50 percent if working overtime or during the hours of 9 p.m. to 4 a.m. Furthermore, maximum hours of work are set at eight hours per day in most industries (extended to 9 in some light service jobs) and 48 per week. Additionally, in keeping with Muslim traditions and allowing for religious adherence, no worker may be forced to work more than two Fridays successively (to allow for Friday prayer services at local mosques) and all employees

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90 Ibid.
91 Building Towers, Cheating Workers, 8
92 Ibid.
93 Ibid.
in all fields of work must be afforded ten specified holidays per year, in accordance with the Islamic calendar to celebrate holy days as well as one national holiday.\textsuperscript{94}

\textit{Labor Law in Saudi Arabia}

The Kingdom of Saudi Arabia's primary labor law is Decree M/51, which was published in 2006 (or 1426 in the Islamic calendar, as Saudi Arabia utilizes the Muslim dating system in all official documents).\textsuperscript{95} Article 3 of this law defines work as "the right of the citizen and any other party may exercise this right and engage in work only after satisfaction of the conditions set forth in this law. All citizens have equal right to work."\textsuperscript{96} While Article 3 specifically provides protection for citizens, Article 7 says these protections exclude "domestic servants and the like" as well as "Non-Saudi workmen who are brought in to perform a specific task and for a period of not more than two months."\textsuperscript{97} As a result, many migrant workers in this oil-rich nation are excluded from any sort of labor protection. Political inclusion is therefore legislatively non-existent.

Article 9 of the decree reads that "Arabic is the language that shall be used in the data, records, files, employment contracts and the other documents provided for in this law or in any other decision issued in implementation of its provisions, as well as the instructions of the employer to its workmen."\textsuperscript{98} This makes it difficult for non-Arabic speaking workers, of whom there are many in Saudi Arabia, to properly negotiate terms of employment, advocate on their own behalf, and conduct business. If the government and private corporations need not provide information for workers in other languages by mandate, it is unlikely that extra money will be budgeted to afford workers this extra option, as it is not stated to be a right.

\begin{flushleft}
\textsuperscript{94} Ibid. \\
\textsuperscript{95} Ministry of Labor of Saudi Arabia, "Decree M/51" 2006. \\
\textsuperscript{96} Ibid., Article 3 \\
\textsuperscript{97} Ibid., Article 7 \\
\textsuperscript{98} Ibid., Article 9
\end{flushleft}
Freedom House

Freedom House also offers important information about the dependent and independent variables, aside from providing existing literature on the subject of migrant workers in the Arabian Gulf. Freedom House’s analytical assessments of current events in the region offer the opinion that these three states have sub-optimal working conditions and treatment for migrant workers, but the degree of which varies.

Freedom House: Kuwait

In Kuwait political parties are banned but so-called “political groupings”, including parliamentary blocs, are permitted and emerging, including the 2005 grouping of Islamists who announced the formation of the Umma Party. Additionally, corruption has become an issue of concern over the past several decades and lawmakers have placed significant pressure on the government to face the issue and strengthen standing anti-corruption policies.

While there is a ban on the formation of political parties, there is technically some right to assembly and association, but the government places constraints upon this, according to Freedom House. In 2006, the 27-year restriction on freedom of assembly was struck down by a court ruling, meaning Kuwaitis may now protest (although they must notify authorities of a protest or public meeting) without the requirement of a permit. Just two years later the government released a decree outlawing public assemblies and demonstrations but the measure was recalled after facing public pressure.

100 Ibid.
101 Ibid.
102 Ibid.
And while Kuwaitis may organize and stage public protests, the conditions for foreign workers have not been ideal. Kuwait is a popular destination for human trafficking with most victims arriving from Bangladesh, India, Pakistan, the Philippines, and Sri Lanka. Kuwait is also known to be a destination country for the trafficking of women and foreign domestic servants remain especially at-risk for abuse and sexual assault. Furthermore, many laborers face low wages—but as they are permitted the right to strike, in July 2008 over 5,000 Bangladeshi workers from government ministries went on strike in response to low wages and lack of payment. Freedom House praised this right to strike, as it is not afforded in many other Gulf States and could have resulted in harsh penalties including imprisonment.

*Freedom House: UAE*

Freedom House reports that in the UAE in 2008 foreign workers continued protesting (sometimes violently) against the low wages and poor working and living conditions they endured in the country, causing the government to take some steps to register the country’s large population of stateless workers. The government continues to place limits on freedom of assembly and association and public meetings continue to require government permits. All nongovernmental organizations are also required to register with the Ministry of Labor and Social Affairs, thus reportedly qualifying to receive subsidies from the government.

As a result of the unrest in 2006 and 2007, the Labor Ministry published a draft of a new labor law in 2007, but was unable to meet the demands of most workers—lacking

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103 Ibid.
104 Ibid.
106 Ibid.
provisions allowing the right to organize, bargain collectively, or strike.\textsuperscript{107} Human Rights Watch praises the move of the government of Abu Dhabi to require the provision of medical care for all employees working for corporations with more than 1,000 employees starting July 2006 and those with fewer than 1,000 starting January 2007.\textsuperscript{108} Penalties for any labor violation are no fewer than 3,000 Dirhams ($833 U.S. currency) and no more than 10,000 Dirhams ($2,778) with the possibility of imprisonment of up to six months.\textsuperscript{109} However, this is a law specific to just one emirate. The nature of the UAE is such that laws sometimes differ by emirate. With Dubai and Abu Dhabi serving as more similar, wealthy emirates many of their laws are relevant to migrant workers. The majority of migrant workers are located within these two emirates.

\textit{Freedom House: Saudi Arabia}

In Saudi Arabia, the royal family has prohibited the formation of political parties and political opposition groups only exist outside of the kingdom, mainly in London.\textsuperscript{110} The state currently faces numerous challenges including an unemployment rate reaching 25 percent, a growing young population increasing pressure on the already stagnant job market, high rates of inflation, a decline in real gross domestic product per capita, increasing degrees of corruption, and a government tasked with spending rather than saving its oil revenues.\textsuperscript{111} This is coupled with the lack of freedom of association and assembly for the country’s citizens. The National Human Rights Association, a semiofficial Saudi organization which reviews allegations of human rights violations and tracks adherence with international human

\begin{flushright}
\begin{thebibliography}{111}
\bibitem{107} Ibid.
\bibitem{108} Building Towers, Cheating Workers, 49
\bibitem{109} Federal Law No. 8 for 1980, On Regulation of Labor Relations, art. 20
http://www.freedomhouse.org/template.cfm?page=22&year=2009&country=7696
\bibitem{111} Ibid.
\end{thebibliography}
\end{flushright}
rights agreements, reported in September 2008 that it had received about 10,000 human rights complaints but is said to have taken little action.\footnote{Ibid.}

Despite these challenges, in 2005 the government approved new legislation that would bring Saudi law into compliance with international standards before joining the World Trade Organization. This new law afforded protection to previously unprotected and unregulated categories of workers, created clear terms for ending employment, and mandated the creation of nurseries for working mothers.\footnote{Ibid.} Furthermore, the new law continued to advance the notion of “Saudization” by requiring Saudis make up at least 75 percent of a company’s employees.\footnote{Ibid.} Still, there are more than six million foreign workers in Saudi Arabia, many of whom were given hope for great wealth, but who endure difficult working and living conditions as well as physical, sexual, and emotional abuse.

**Mulligan and Protests in Aramco**

As noted earlier, William Mulligan’s collection of papers document many of the early strikes within Aramco, through which employees hoped to gain greater rights and accommodations. One document drafted by Mulligan on November 5, 1966 outlines developments in labor relations within the Kingdom and the company. He begins, “labor disturbances, like fires, are emergency situations.”\footnote{Ibid.} He goes on to compare demonstrations in Aramco in 1966 to the Bapco (Bahrain Petroleum Company) Strikes of March 1965 in Bahrain, saying, “As in Saudi Arabia, there are no labor unions in Bahrain, although unions are not prohibited by law. Due possibly to the active involvement of labor unions in the

\footnote{William Mulligan. Labor Relations Developments. Dhahran: Aramco, 1966}
politics of the Middle East, the Ruler is unsympathetic to the formation of labor unions..."\(^{116}\)

This provides an earlier perspective into the response of governmental officials to the notion of unionization. This comes after attempts several decades earlier to assemble organized groups for workers, especially those from particular ethnic groups.

Mulligan’s collection provides insight into the company’s perspective on the Aramco demonstrations of 1965. They occurred on June 14 and 15 in Ras Tanura (a compound in the Northeast) when considerable numbers of Saudi Arab employees staged demonstrations at the end of the day shift.\(^{117}\) Statistics from the Labor Relations Division of Aramco showed that over the years immediately preceding these strikes there had been an increase in the number of employees seeking resolution to work-related problems.\(^{118}\)

This mounting tension reached a boiling point after the Council of Ministers removed price subsidies on a number of imported food items, milk and medicine, and livestock on May 15, 1966.\(^{119}\) Employees demonstrated asking for higher allowances and other benefits.\(^{120}\) Over 800 employees demonstrated in Ras Tanura and 400 in protested, some of whom were arrested and a few of whom were subsequently let go from their jobs. While instances of corporate discontent were frequent, as indicated by complaints filed by workers and chronicled by Mulligan, large-scale protests and riots were rare.

Reform in Kuwait

While migrant worker protests were somewhat common in Saudi Arabia in the 20\(^{th}\) century, the movement toward protest and reform has been most zealous in the Kuwaiti labor market over the past five years. A growing movement in Kuwait has called for a decrease in

\(^{116}\) Ibid.
\(^{117}\) Ibid.
\(^{118}\) Ibid.
\(^{119}\) Ibid.
\(^{120}\) Ibid.
the presence of foreign workers, both through official government action and indirectly as a result of economic pressures. Kuwait is currently experiencing record levels of unemployment and with 27,000 Kuwaitis entering the labor market each year in addition to those already searching for employment, an influx of foreign workers presents an ongoing problem.\textsuperscript{121} The Kuwaiti government strives to replace foreign workers with Kuwaitis at a rate of 10 percent per year, training no less than 3,000 annually to replace foreigners in the private sector, mostly in management and information.\textsuperscript{122} Kuwait’s Parliamentary Research and Information Committee discovered this year that nearly 60,000 non-nationals working in public sector jobs could be replaced by Kuwaitis, spurring this movement toward a greater national presence in the workforce.\textsuperscript{123}

\textit{Size and Scope of Migrant Worker Populations}

<table>
<thead>
<tr>
<th>Variable</th>
<th>Kuwait</th>
<th>UAE</th>
<th>Saudi Arabia</th>
</tr>
</thead>
<tbody>
<tr>
<td>Size and scope of worker population</td>
<td>Dominant</td>
<td>95% of workforce</td>
<td>Sizable, but smallest of the three cases</td>
</tr>
</tbody>
</table>

As illustrated above in figure 4, the size and scope of the migrant worker populations differs across the three cases. Migrant workers comprises the vast majority of the workforce in the UAE while it is a large contingent (between 30-60 percent of the population.

\textsuperscript{121} \textit{Ibid.}
\textsuperscript{123} \textit{Ibid.}

http://www.deccanherald.com/content/55767/kuwait-may-stop-hiring-foreigners.html
depending on the source)\textsuperscript{124} in Kuwait and a sizable group, but the smallest proportion of the three cases, in Saudi Arabia.

\textit{NGO Influence}

\begin{center}
\begin{tabular}{|c|c|c|c|}
\hline
Variable & Kuwait & UAE & Saudi Arabia \\
\hline
NGO influence & Significant & Little & Negligible \\
\hline
\end{tabular}
\end{center}

Nongovernmental organizations also differ greatly case-by-case in terms of influence. In the case of the United Arab Emirates, the Human Rights Report points out that international NGOs are often denied legislatively-afforded access to prisons and other locations of interest.\textsuperscript{125} Many statistics utilized by Human Rights Watch and other NGOs are estimates, as states such as Saudi Arabia deny access to their state statistics and prohibit most access to the Kingdom without a visa for a Muslim visitor on \textit{hajj} (the pilgrimage to Mecca) or business purposes. Research within the Kingdom is possible, but more difficult to arrange because of a sponsor-based visa system.

\textit{International Penetration}

\begin{center}
\begin{tabular}{|c|c|c|c|}
\hline
Variable & Kuwait & UAE & Saudi Arabia \\
\hline
International Penetration & Yes & Yes & Little \\
\hline
\end{tabular}
\end{center}

Another area in which the cases differ is the exposure to international penetration. As a result of the United Nations intervention following Saddam Hussein’s invasion of Kuwait,


the small emirate was thrust into international headlines, through the global news media and debates in foreign legislatures. As the United States decided to enter the conflict, the global power became increasingly connected to the region. While the U.N.-led coalition was able to liberate Kuwait from its invaders—a positive development for the citizens—power was also taken from the Kuwaiti people and placed in the hands of the international community. Despite the negative consequences of removing power from the populous, this weakening of the Kuwaiti government created a vacuum in which residents could eventually gain some power and leverage and create a more progressive regime.
V. Analysis

As illustrated in the empirical data, a number of current events and variables impact the level of political inclusion and quality of life of migrant workers. The differences between the cases serve to answer the research question of why these three cases, with relatively similar histories, cultural aspects, and political infrastructures, have such divergent levels of political inclusion. The independent variables of international penetration, influence of nongovernmental organizations, and size and scope of migrant worker population offer possible conclusions as to why these levels differ.

In the case of Kuwait, where the treatment of laborers and legislative rights afforded to migrant workers is best, there are several distinct disparities between the Kuwaiti case and that of Saudi Arabia and the UAE. First, some scholars pointed to instability in government after the emir collapsed the legislature, but one might argue that this affords citizens and non-citizens a great degree of political freedom by weakening the power of the government. The notion that this move by the emir tightens the government does not align with the expansion of rights and crackdown on abuses that has occurred in the past few years.

Size and Scope of Migrant Worker Populations

As illustrated previously, the size and scope of these populations differ in size, while most come from the same region and complete similar jobs. Most migrant workers in all three states are from Southeast Asia and work in labor or service industries, such as construction or domestic service. In most cases, migrant workers come to achieve greater income levels than they could in their home countries. Prospective migrant workers in the UAE and Kuwait work predominantly with controversial hiring or recruitment agencies. With this recruitment often comes the confiscation of passports, high prices, and a lack of
In Saudi Arabia most migrant workers come to Aramco through agencies in the home countries (such as Bangladesh or India) that set up shop in poor villages and offer opportunity for transportation to Saudi Arabia and a “career” as a fireman or landscaper on one of the company’s four residential compounds.127

In Kuwait, nearly 17,000 expatriates residing in the oil-rich emirate canceled their residence permits and left in the first two quarters of 2009. As it stands, no foreigner can live in the country without a valid residence permit, which is contingent upon employment. With the movement toward employing greater numbers of Kuwaitis, the number of foreign workers in Kuwait decreased by 20,000 at the end of 2009, the first drop since the Iraqi invasion in 1990.128 This is in contrast to 2007, where the number of expatriates rose by 8.5 percent and 2004, the largest year of expansion, when the increase was 11 percent.129

Size and Scope: A U-Shaped Relationship?

Upon further research of the size and scope of migrant worker populations it appears that there is the potential for a U-shaped relationship with political inclusion. In other words, a government with a very large migrant worker population, such as the UAE must be able to control the population or face a potential threat to power. Similarly, a country with a relatively small population of migrant workers, such as Saudi Arabia, has an easier time oppressing this population. A state like Kuwait, which has a large but still minority population of migrant workers, provides better conditions for workers because the population is too big to easily oppress but not big enough to be a great threat to power.

126 Building Towers, Cheating Workers, 6-15
128 Ibid.
129 Ibid.
For this discussion bringing in other GCC member states becomes relevant. States such as Bahrain enjoy relatively strong civil societies and workers rights, while expatriates comprise a significantly smaller proportion of the population (little more than half the percentage they comprise in Kuwait). Oman, a country with a less vibrant civil society and relatively little political inclusion of migrant workers has an expatriate population of roughly 20 percent, a small group that would fall in line with that of Saudi Arabia, where controlling (or oppressing) workers is much easier. The expansion of case exploration for this variable illustrates that the relationship is not U-shaped across all cases, simply these three.

**NGOs in the Arabian Gulf**

As illustrated in figure 5, NGO influence varies across the region. Founding a local NGO is difficult across the region, but least difficult in Kuwait. The first independent human rights organization was established in Saudi Arabia in 2004—several decades after the founding of the country. The National Human Rights Association (NHRA) was created to “implement human rights charters signed by Saudi Arabia” and “include a special panel to monitor violations of women’s rights”. This move was praised both internally and externally, with Ambassador to the United States, Prince Bandar bin Sultan stating, “The establishment of this human rights organization is just another step in Saudi Arabia’s integrated reform program. Institutions such as these are the foundation for successful and lasting reform.” However, despite these reforms the royal family of Saudi Arabia still

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131 Ibid.  
133 Ibid.
faces much criticism for being one of the least progressive regimes in the Middle East. While the Wahhabi establishment in Saudi Arabia lacks much official power, the royal family delegates some power to it indirectly through various decisions and organizations. Wahhabism dominates a number of ministries, including education, information, and religious institutions, offering numerous opportunities to exercise power and influence. This influence is often thought to be counterproductive to reform and change, as Wahhabism is a more puritanical sect of Islam.

This aversion to NGO influence is in slight contrast to the Kuwaiti government's position on NGO formation and action. While not entirely open to the formation of such organizations, the government uses its power to license associations as a means of political control. Furthermore, in 2005 the Department for Charitable Societies and Foundations published a Guide Book (available in Arabic and English) containing all laws and decisions that relate to charitable work in Kuwait. In 2008 there were 73 officially licensed NGOs in the country with no new licenses awarded by the Ministry of Social Affairs and Labor (MOSAL) that year. The MOSAL rejected several requests for licenses on the grounds that already established NGOs offered the same or similar services. The 45 NGOs licensed prior to 2004 continue to receive government subsidy for their operation (although small at $41,000 annually for all 45 organizations), while organizations licensed since 2004 do not receive any financial assistance. Many NGOs must wait years for approval from the MOSAL, but at least are afforded the opportunity to become officially government-

136 Ibid.
recognized groups. However, there are also many unlicensed groups in the country which operate with little or no government interference. According to UNDP, civil society in Kuwait is young and deeply rooted in faith-based endeavors, but contains 70 associations for the collective benefit, 29 philanthropic or charitable organizations, 41 workers syndicates and federations, 18 professional groups and unions, an unknown number of chambers of commerce, 28 sports clubs and Olympic committees, 47 cooperative sector organizations, and 15 political groups and organizations.137 So while this sector is young, it is thriving and diverse, containing groups that address a wide variety of issues. This sector is far more extensive than that in Saudi Arabia or UAE, an important difference.

In the United Arab Emirates, like Kuwait, all NGOs are required to register. In the United Arab Emirates they do so with the Ministry of Social Affairs. Approximately 100 domestic NGOs are registered with the ministry, but more than 20 unregistered local nonpolitical NGOs operate with little or no government interference.138 However, all NGOs must receive permission from the Ministry of Social Affairs to participate in events outside of the country. These trips are subsidized, but the group must receive permission from the government even if representatives from the group will only be attending, not speaking at, the event.139 This provides great support for NGOs but restrictions are such that publications, presentations, and speeches must be reviewed first by the government. This places restrictions on the content of such materials, limiting the range of actions by NGOs.

139 Ibid.
Civil Society

The factors that seem most important in determining the rights afforded to migrant workers and the treatment and conditions they endure are not legislative, but largely determined by non-state actors. As noted earlier, international influence played a large role in the development and rebuilding of the current Kuwaiti economy and society. However, this is not the only non-governmental factor that played a large role for these three cases.

Civil society, comprised entirely of non-state actors, includes all voluntary civic and social organizations and institutions that form the society, in contrast to the structures of a state. Popular in Kuwait, diwaniyas are informal weekly social and political gatherings. Many male citizens, including members of the government and National assembly, and increasing numbers of female citizens host or attend diwaniyas. Mixed sex diwaniyas are not rare and also permissible. The right to host and attend these informal gatherings is protected by law in Kuwait, showing a governmental inclination to support civil society. This partnered with the financial support (in some cases) and licensure of NGOs shows a difference between Kuwait and the other two cases when studying the issue of civil society. Kuwait has the most vibrant civil society of the three cases, just topping the United Arab Emirates, which corresponds to the level of political inclusion for these three cases. While government regulated, labor unions are even permitted in Kuwait. The government provides funding without many of the stringent restrictions placed on these groups in the other two states. Political parties are illegal, unless officially government formed, but there

are still outlets for political expression in the form of NGOs, civil society groups, and labor unions.

In Saudi Arabia such meetings are often prohibited or at the very least, monitored. Meetings between the sexes are strictly regulated and, in most cases, prohibited. Such informal political discussions between men and women would not be permitted in Saudi Arabia. Additionally, a woman visiting the homes of others is often challenging as women cannot drive and most travel must be regulated by a woman’s husband.

The United Arab Emirates has a unique civil society, as most groups—formal and informal—are comprised predominantly, if not solely, of expatriates. With over 80 percent of the population being of international origin, Emiratis are largely excluded from the typical civil society of a resident of Abu Dhabi or Dubai—the richest and most expatriate-friendly of the seven emirates. This cultural divide is also unique to the UAE. While vibrant foreigner communities exist in all three states, the vast majority of UAE residents are non-nationals and, as such, society is often in conflict with the laws of a relatively conservative, autocratic, Muslim state. The importance of civil society is not only that of indigenous civil society but that which is permitted and created by regulation and expatriate and migrant worker groups.

These differences illustrate the divergent nature of the treatment and conditions for migrant workers in the Arabian Gulf. As treatment of groups and organizations varies, so does the treatment of individual workers. Conditions for laborers as well as the rights and protections afforded to migrant workers improve from Saudi Arabia to the UAE to Kuwait, when drawing comparisons among the three cases. In the same way, the vigor of civil society increases across these three cases in that order. This is measured by proxy through the influence of NGOs. Of the independent variables, the influence of NGOs offers a
reasonable explanation of a key difference between the three states that corresponds to the levels of political inclusion.

The states which permit active civil societies find that such societies blossom—and not, as one might expect, at the loss of power for the governing institutions. This leads one to conclude that it is not, in fact, detrimental to a state to afford rights to individual citizens to gather in social settings to discuss issues—from the benign to the contentious—to allow for a free-flow of ideas and a civil discourse.

*International Penetration*

The degree and type of international penetration varies greatly among the three cases as well. Saudi Arabia, as already stated, has little exposure to international penetration—entirely by choice. While the United States (usually) has a friendly relationship with the oil-rich country, it is the explicit policy of the Saudi Arabian government that they avoid external influence. This is not unique, as most states opt to minimize the power of external forces, but Saudi Arabia does so by prohibiting visitors under most circumstances, placing tight restrictions on the formation of groups—political and otherwise—and prohibiting unionization and international influence through military presence or public diplomacy.

The United Arab Emirates falls somewhere between these two cases, as it lacks the experience with U.S. intervention but is not averse to foreign presence. Foreign investment comprises the bulk of the country’s wealth, outside of the oil industry. The UAE has a diverse economy that relies on both expatriates and international trade partners to flourish. As such, strong international relationships and influence are necessary to the economic success of the country. The UAE has a Free Trade Zone which offers 100 percent foreign
ownership and zero taxes.\textsuperscript{142} This, along with a $20 billion bond program launched in 2009, offers a multitude of incentives for investment by foreign corporations.\textsuperscript{143} Dependence on oil has led to drops in the GDP, providing an impetus for the country to continue its economic diversification.

\textit{A Possible Objection: Economic Analysis}

Some might argue that political inclusion is related to a country’s wealth. Upon initial investigation of the per capita gross domestic product (GDP) of these three states, it appears that there is a correlation between a high degree of wealth and political inclusion of migrant workers. While experts criticize Kuwait’s reliance on oil for its economy, this oil-rich emirate enjoys a high per capita gross domestic product (GDP) of $54,100\textsuperscript{144} UAE, by comparison, has a per capita GDP of $42,000\textsuperscript{145} and Saudi Arabia’s is $20,400—less than half of that of Kuwait.\textsuperscript{146} However, this does not address the overall GDP or gross national income (GNI or purchasing power parity dollars for all nationals). The GDP in Saudi Arabia is $469 billion as of 2008 (the most recent World Bank statistic) while Kuwait’s GDP in the same year was a mere $148 billion.\textsuperscript{147} In 2007, the GDP of the United Arab Emirates was $199 billion.\textsuperscript{148} Based on these statistics, Saudi Arabia has the highest overall wealth, followed by the UAE with Kuwait following close behind. This does not co-vary with the respective degrees of political inclusion in these three countries.

\textsuperscript{143} Ibid.
\textsuperscript{148} Ibid.
Furthermore, GDP per capita over time does not co-vary with the results of a survey of political inclusion. In 1980 the UAE enjoyed a higher per capita GDP than Kuwait or Saudi Arabia during the Iraqi invasion of Kuwait the per capita GDP within the country fell below $10,000 (from a previous high nearer to $20,000).\textsuperscript{149} Although initially this might strengthen the argument that per capita GDP correlated with political inclusion, as Kuwait had its lowest levels of both around this time, the rebuilding period offered immense opportunity for migrant workers but the per capita GDP did not immediately reflect an increase. International penetration played a greater role in this time period. Additionally, it is difficult to draw conclusions with these numbers and make a broadly applicable argument, as all three cases enjoy a high GDP and per capita GDP by global standards. The graphs below illustrate GDP and per capita GDP, respectively, over time across the three cases.

\begin{center}
\textbf{Graph 1. Gross Domestic Product from World Bank's World Development Indicators}
\end{center}

\textsuperscript{149} Ibid.
Another key economic difference among the cases is the privatization of industry. In the UAE, most industries are privatized, with the exception of the oil industry (with the Abu Dhabi National Oil Company producing 2.7 million barrels of oil per day).\textsuperscript{150}

This is in contrast to Saudi industry, which until recently was nearly equally privatized and government-run. However, in 2002 Saudi Arabia announced the move toward privatization of 20 major sectors including telecommunications, the energy sector, the postal system, and the National Insurance Company.\textsuperscript{151} The Saudi Arabian Airlines also began privatizing in 2006.\textsuperscript{152}

Migrant workers thrive in Kuwait and, as such, there has been great economic growth. In Saudi Arabia, the economy is more stagnant. While a number of factors

\textsuperscript{152} SV History, “History of the 00’s,” Saudi Arabian Airlines, http://www.saudiairlines.com/portal/site/saudiairlines/menuitem.d9a467d070ca6c65173ff63dc8f034a0/?vgnextoid=25dc8a09951c4110VgnVCM10000015e25558RCRD
contribute to this difference, one of note is the difference in treatment of migrant workers. Statistics support what one might assume—that happy workers are harder workers. In states where there is little protection there is fear of speaking up but also less productivity. Figure 7 provides a concise table of the economies of the three cases by global standards.

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<th>Figure 7: Economies of Selected GCC member states</th>
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<tr>
<td>GDP</td>
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<td>GDP per capita</td>
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<td>Private Sector</td>
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VI. Conclusion

As Lim states, the variable (or variables) responsible for explaining a certain phenomenon are discernable when they co-vary with the outcomes. For example, in the case of political inclusion of migrant workers, the most politically inclusive (according to the dependent variable of rights actualized) is Kuwait, followed next by the United Arab Emirates, and lastly Saudi Arabia—this co-varies with the degrees of NGO influence (as a proxy for civil society vigor) being the highest in Kuwait, followed by UAE, and then Saudi Arabia. This provides an “answer” to the question of migrant workers in the Middle East.

Another variable which has a weak correlation to level of political inclusion is international penetration. While international penetration is relatively high in Kuwait as is political inclusion, the results cluster differently than they do in the dependent variable. Figure 8 illustrates the co-variance of these variables.

<table>
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<th>Figure 8: Co-variance of Independent Variables and Dependent Variable</th>
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<td>Kuwait</td>
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<td><strong>Political Inclusion</strong></td>
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<td><strong>NGO Influence</strong></td>
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<td><strong>International Penetration</strong></td>
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<td><strong>Size &amp; Scope</strong></td>
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As displayed in Figure 5, political inclusion as demonstrated by the actualization of rights by migrant workers follows a rank (from best to worst) of Kuwait, UAE, and Saudi
Arabia. NGO influence also follows this trend. International penetration is close, but because of the nature of the penetration, the outcomes differ and do not co-vary. The size and scope of the worker population is not an appropriate causal factor, as one would infer that the UAE would have the "best" policies toward workers and Saudi Arabia the worst, while in reality Kuwait offers the most optimal conditions.

The implications of these results are also important. As regimes in the region change, grow, and—in some cases—progress, changes must be made to better the lives of citizens and non-citizens alike. Governments have seen that discontent among the people can bring about not only loud and violent protest, but unrest and upheaval that can threaten the stability of the country. In making policy recommendations, it seems to benefit not only workers but also the government to afford greater rights and allow for workers to actually receive them in practice, not only on paper.

As it seems highly unlikely that Saudi Arabia will open its doors to international penetration on a large-scale, one way in which migrant workers might expand their rights is by lobbying for the expansion of NGO influence in the country. A vibrant civil society provides a forum for discussion, a space for reform, and in some cases, another way in which the government can retain some control over non-governmental actions and agencies.

As the reach of globalization continues to grow, so does the movement of people for labor purposes. Although many Arabian Gulf states do not provide optimal conditions for these workers, steps are being made in some countries. The expansion of worker protection in Kuwait and elsewhere improves not only the condition of workers, but the quality of work. Although organizations such as HRW and Freedom House cannot solve the ills of the world,
the opening of indigenous civil society to migrant workers for dialogue and discussion allows the people of these countries to come together to create solutions of their own.
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