Subsidised By Slavery: How States Are using Temporary Worker Programmes To Take Advantage of The World's Most Vulnerable Workers

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Abstract

Migrant workers, defined as "a person who is to be engaged, is engaged or has been engaged in a remunerated activity in a state of which he or she is not a national" under Article 2(1) of the International Convention on the Protection of the Rights of All Migrant Workers and Members of Their Families (ICRMW), are arguably the backbone of most societies. However, many countries do not offer adequate legal protections to migrant workers. This allows them to be exploited by employers and denied provisions that are enjoyed by nationals, including access to healthcare and limits on daily working hours, which in turn perpetuates their vulnerability. In particular, this paper will focus on two 'smart cities,'' Dubai and Singapore, to exemplify how economic efficiency is built upon the unfair treatment of migrant workers. This author ultimately concludes that Temporary Worker Programmes have embedded this exploitation into the structure of the global order and many protections need to be put into place to stop this from continuing.

Introduction

This paper will explore the practical applications of migrant workers' participation in temporary worker programmes (TWP) and how this links to fairness, justice, and equality. Mantouvalou defined temporary worker programmes or TWP as "schemes whereby migrant workers arrive in a country to work, often without a route to permanent residence or citizenship".[1] For the purposes of this article, the definition of a "migrant worker" outlined in Article 2(1) of the International Convention on the Protection of the Rights of All Migrant

[1] Virginia Mantouvalou, "Migrant Workers," Structural Injustice and Workers' Rights (2023)

Workers and Members of Their Families (ICRMW) will be adopted: " a person who is to be engaged, is engaged or has been engaged in a remunerated activity in a state of which he or she is not a national".[2]

The first section of this article will discuss the implications of TWP on workers and how they continue to create an environment of exploitation. Following this, the author will draw upon previous cases of exploitation, placing a particular focus on Singapore and the United Arab Emirates (UAE) (specifically Dubai), which are collectively recognised as global metropolitans or "smart cities". Furthermore, the present legal protections available domestically and internationally will be addressed, emphasising the range of protection offered to migrant workers in different jurisdictions Next, the paper will briefly touch on undocumented migrant workers and the implications they face in their countries of employment. To conclude, a starting point for policy recommendations will be suggested, which aims to prevent further cases of exploitation of migrant workers.

Contemporary Labour Markets

This section will begin by examining migrant workers as the most vulnerable actors within contemporary labour markets, showing how legal precarity, social exclusion, and unfamiliar environments systematically undermine principles of inclusion and citizenship. TWPs are argued to constitute a "triple win", as they are advancing the goals for the workers themselves, as well as the country of destination and the country of nationality.[3] However, in reality, the worker is not "winning" as they are forced to accept substandard working conditions, such as workers at COP28 sites in Dubai where they are forced to work during hours of extreme heat,

[2] International Convention on the Protection of the Rights of All Migrant Workers and Members of Their Families (18 December 1990) General Assembly resolution 45/158.

[3] Virginia Mantouvalou, "Migrant Workers," Structural Injustice and Workers' Rights (2023).

despite there being a government policy explicitly banning this.[4] In order to earn for the family in their home country, workers become trapped in an exploitative cycle until their visa ends. This is because regressing into an undocumented status would be a more insecure position,[5] as their lack of status would prohibit them from accessing public benefits and standard citizenship rights, such as education. Ordinary migrant workers already do not have the same rights as citizens to begin with, i.e. they cannot access healthcare, which can be subsequently exploited by employers, by falsely promising that they will provide these amenities in order to pressure them into working harder. It is therefore clear that the temporary migration status, rather than migration itself, is the key legal mechanism through which vulnerability is created,[6] which has led to worsening conditions for migrant workers. Despite this, there is an increased reliance on TWP due to its temporary nature as there is a growing societal fear that a large volume of fully right-holding migrants would lead to the region's cultural foundation being changed. However, in reality, this is simply implausible because of the ratio of ethically British citizens. For this reason, this author deplores the use of this reasoning to deny calls for reformation, such as increases in wages for current low skilled domestic workers, especially in countries, such as Canada, the United States and the United Kingdom.

Sengupta highlights critical views, such as that of Castle, of TWP to the effect that they were designed to import labour, not people.[7] For example, Canada's Seasonal Agricultural Workers' Programme was underwritten as an "administrative arrangement" opposed to an international

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[4] Human Rights Watch, 'Questions and Answers: Migrant Worker Abuses in the UAE and COP28' (2023) <https://www.hrw.org/news/2023/12/03/questions-and-answers-migrant-worker-abuses-uae-and-cop28> Accessed 11 January 2026.

[5] Hila Shamir, 'The Paradox of "Legality": Temporary Migrant Worker Programs and Vulnerability to Trafficking', in Revisiting the Law and Governance of Trafficking, Forced Labor and Modern Slavery, (2017) 471–502.

[6] Mitu Sengupta, "Protecting Migrant Workers in The Twenty-First Century: Challenges in Rich Democracies." World Affairs: The Journal of International Issues, vol. 11, no. 3, 2007, 86–116.

[7] Ibid 111.

agreement so they would not be subject to international labour laws.[8] The labour is being treated independent of the actual workers carrying out the work; the agency of the worker remains unconsidered when making senior decisions. This can also be seen at the citizen level where low-income migrant workers are given little consideration as constituents by major political parties because they are socially distant and seen as a means to an end for the government in terms of labour.[9]

Moreover, the combination of migrant populations living on outskirts of cities,[10] the purposefully constructed barriers to trade unions and their isolation from the domestic population, reinforces their experiences of social exclusion. Despite some migrants spending the majority of their life in the country of their employment, they will still be regarded as "foreigners". In 2019, 85% of migrants arriving via skilled workers programmes remained after 5 years.[11] Routes towards permanent residency make this possible, such as through study or family paths. This makes it easier to segregate migrant workers, treat them with less dignity because of their route into the country, disregarding their rights such as those under Article 1 in the UDHR. While law may exist, it may create circumstances that reinforce this inequality rather than resolve it. This creates a paradoxical situation where initiatives that are perceived to be encouraging migration, such as TWPs, heighten migrants' vulnerability to exploitation rather than mitigating it, seen within the example of their temporary status. Overall, these structural vulnerabilities demonstrate that temporary worker programmes, while framed as mutually beneficial, systematically embed exploitation and exclusion.

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[8] Ibid, 97.

[9] Ibid. 86–116.

[10] Ibid.

[11] Home Office, 'Who stays, who leaves? Evidence from administrative records on the Skilled Worker route! (Migration Advisory Committee, 2024) <https://www.gov.uk/government/publications/who-stays-who-leaves-evidence-from-the-skilled-worker-route/who-stays-who-leaves-evidence-from-administrative-records-on-the-skilled-worker-route-accessible>. Accessed 15 September 2026

Case studies

Singapore

Following on from this theoretical understanding, the author will now analyse the case studies of Dubai and Singapore - leading 'smart cities', which illustrate how advanced economic efficiency relies on, and conceals, the exploitation of migrant labour. For clarification, a smart city is a term denoting "the effective integration of physical, digital and human systems in the built environment to deliver a sustainable, prosperous and inclusive future for its citizens."[12]

Beginning with Singapore, as of June 2025, there was said to be 1,593,400 foreign workers, of which 308,700 were migrant domestic workers (MDWs), a number which continues to grow annually.[13] Singapore's labour legislation applies differently depending on skill level: skilled professionals' benefit from more favourable laws, while unskilled migrant workers, such as MDWs, are subject to stricter rules and have no pathway to permanent residency or citizenship. As a result, these migrant workers stay within Singapore on a temporary basis to work until they no longer have permission to do so. By restricting migrant workers from the main Employment Act, they are categorised under alternative statutes which omit certain provisions, including limits on daily working hours and mandatory days off, embedding vulnerability rather than legal protection.[14] As Devasahayam highlights this legal segmentation, has led to many Asian countries such as Singapore to openly limit the number of migrant workers, alongside their duration of residence and settlement rights based on skill level.[15] Although formal regulations exist, the conditional nature of these protections, combined with the threat

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[12] BSI Knowledge, PAS:180, Smart Community Infrastructures (BSI, 2014) <https://knowledge.bsigroup.com/products/smart-cities-vocabulary>.

[13] Singapore Government Employment Pass (EP) Ministry of Manpower Singapore (September 22, 2025) <https://www.mom.gov.sg/foreign-workforce-numbers> Accessed 6 January 2026.

[14] Human Rights Watch, 'Singapore' (Human Rights Watch, January 13, 2021) <https://www.hrw.org/world-report/2021/country-chapters/singapore#f176e9> Accessed 9 January 2026.

[15] Theresa W Devasahayam, 2010. "Placement and/or Protection? Singapore's Labour Policies and Practices for Temporary Women Migrant Workers." Journal of the Asia Pacific Economy 15 (1): 45–58.

of deportation and employer-controlled work permits, renders legal remedies largely inaccessible in practice. In parallel with Dubai, unsanitary and crowded accommodation are common among migrant workers – the dangers of which were magnified by the spread of Covid-19 when more than 90% of reported cases in Singapore in August 2021 were of workers in dormitories.[16] This demonstrates that legal frameworks systematically fail to account for the living and working realities of unskilled migrant workers, reinforcing their marginalisation.

Dubai

Currently, Dubai is known to be home for many nationalities, with 96% of the city's employed population said to be foreign nationals.[17] Dubai relies heavily on their Kafala system to facilitate a large number of migrant workers. This however exemplifies how migrant workers are excluded in practice from meaningful legal protection through immigration-linked labour control. [18] Under the Kafala system to reside and work, a sponsorship is required by an Emirati national or a local business. Despite recent reforms, issues with the system exploiting the migrant labour process and treating workers as commodities persist.[19] UAE authorities have justified this unequal legal status on the grounds of national security and social stability, but in reality, it enables the government to maintain advantages, such as access to more jobs, for those with citizenship. Empirical studies, such as the Gulf Labour Markets and Migration Report (2019), documents that migrant works suffer with perpetually low wages, overcrowded accommodation/transportation, hazardous working conditions, and degrading treatment, which

[16] Human Rights Watch, 'Singapore' (Human Rights Watch, 13 January 2021) <https://www.hrw.org/world-report/2021/country-chapters/singapore#f176e9> Accessed 9 January 2026.
[17] Angelica Dona 'Dubai: "The Land of Opportunities" but Not for Everyone. "An Analysis of the Existent Dichotomy between Exploited Immigrant Workers and the Advantaged Foreign Investors & Companies' (2022) UniVè Repository, <https://unitesi.unive.it/handle/20.500.14247/15730?> Accessed 31 December 2025.
[18] Matthew T. Page, Jodi Vittori "Dubai's Role in Facilitating Corruption and Global Illicit Financial Flows" (Carnegie Endowment for International Peace) <https://carnegieendowment.org/research/2020/07/dubais-role-in-facilitating-corruption-and-global-illicit-financial-flows> Accessed 3 January 2026.
[19] Mona Elsayed, 'An Overview: The United Arab Emirates' Labour Market' (London School of Economics, 2024) <https://eprints.lse.ac.uk/124359/1/MEC-series-89.pdf> Accessed 31 December 2025.

gives rise to strikes, protests, and reported suicide cases. For example, during the building of Expo City Dubai where COP28 talks were said to be held, notwithstanding additional protections in place such as Expo2020's Worker Welfare Policy. [20] Despite this, there was minimal government response and no public legal action taken, demonstrating the disconnect between the existence of labour regulations and their effective application to migrant workers.[21]

Despite being branded as smart cities, it is clear that Singapore and Dubai fall short of creating an inclusive future where people from different backgrounds and skill levels are afforded equal access to opportunities. Instead, they have systematically imported migrant workers for labour, while excluding them from meaningful protection within legal frameworks.

Current legal protections

Notwithstanding an extensive framework of international labour standards, migrant workers remain excluded from meaningful protection due to weak enforcement and state resistance; as a result, these laws fail to deliver substantive equality of opportunity or condition. This is evident as many countries do not view migrant rights as fundamental human rights less than 50 countries ratified the 1990 UN International Convention of the ICRMW; the lowest among fundamental human rights treaties, with a third ratifying states adding reservations.[22] This pattern is particularly evident in migrant-concentrated countries, which are reluctant to allocate migrants equal rights reflecting a broader theme of a lack of legal protections. Ruhs argues that the low ratification of treaties and limited success of migrant rights arises from states' desires to preserve labour flexibility; exclusion as a policy choice

[20] Human Rights Watch, 'Questions and Answers: Migrant Worker Abuses in the UAE and COP28 (Human Rights Watch, 3 December 2023) <https://www.hrw.org/news/2023/12/03/questions-and-answers-migrant-worker-abuses-uae-and-cop28> Accessed 6 January 2026.

[21] Sara Hamza, 'Migrant Labor in the Arabian Gulf: A Case Study of Dubai, UAE', Pursuit - The Journal of Undergraduate Research at The University of Tennessee 6/1 (2015), 81–114.

[22] Martin Ruhs, (2012). The Human Rights of Migrant Workers: Why Do So Few Countries Care? American Behavioral Scientist, 56(9), 1277-1293.

rather than an enforcement failure. [23] As such, migrant rights need to be studied in the wider context of domestic foreign policy in order to assess international migration as the economic and political contexts of the migrant workers home countries critically shape their circumstances. A country's response must account for these external factors, not merely its own domestic priorities.

Once migrant workers are within their workplace, if it is a properly regulated sector as per employment law in the UK, such as the Trade Union and Labour Relations (Consolidation) Act 1992, then they should have access to trade unions to represent their collective interests and to be able to "negotiate with employers and governments to defend and improve the conditions in which workers sell their labour to capital."[24] However, there is a tendency within trade unions to group them within the wider pool of workers without considering their specific challenges that arise as a result of being a migrant. For example, the intersection of 'race', gender, class, or other protected characteristics are often not considered in tandem when recruiting workers.[25] This universalistic approach undermines effective diversity practices. Moreover, even where labour laws formally apply, the inability of most migrant workers to leave employment without risking deportation as they are often in TWPs renders legal remedies largely inaccessible.[26] As a result, this demonstrates how the law itself can produce injustice, reinforcing the argument that the most vulnerable workers remain outside meaningful legal protection, despite the appearance of legality.

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[23] Asian-African Legal Consultative Organization and Secretariat, 'Legal Protection of Migrant Workers' (2025) <https://www.aalco.int/63rdAnnualSession/Briefs2025/Final%20Legal%20Protection%20of%20Migrant%20Workers%202025.pdf> Accessed 2 January 2026.

[24] Alberti Gabriella, Jane Holgate, and Maite Tapia. "Organising Migrants as Workers or as Migrant Workers? Intersectionality, Trade Unions and Precarious Work." The International Journal of Human Resource Management 2013. 24 (22): 4132–48.

[25] Ibid. 4134

[26] Maayan Niezna, 'Paper Chains: Tied Visas, Migration Policies, and Legal Coercion' (2022) 49 Journal of Law and Society 362.

Potential reforms

This section briefly outlines policy reforms necessary to advance fairness and justice, ranging from stricter enforcement of existing international labour standards in the short term to longer-term restructuring of labour migration systems, with NGOs playing a key role. Positive examples of the domestic law incorporating international labour standards can be seen in Canada and Australia, as they have wage laws, anti-discrimination provisions as well as health and safety standards for migrants.[27] Working towards anti-discrimination legislation would be beneficial for any country wanting to continue to receive migrant workers. This follows on from the fact that an underutilised source of enforcement are non-domestic organisations, such as United Nations Special Rapporteur on the human rights of migrants, and particularly Non-profit Organisations (NGO), such as Migrant Rights in West Asia. NGOs have four main characteristics: independence from government and donors, voluntary in character, namely non-profit and public interest orientation.[28] Focusing on public interest would require greater awareness the link between healthier society conditions and better migrant worker rights would have to be explained to the public. Further potential reforms that NGOs and governments could work towards could include the advancement of the integration process through different courses, such as language and cultural orientations, alongside mentoring programs, to enable workers to attain jobs that fit their skillset.[29] Enhancing immigrant social safety nets, such as housing, healthcare, and unemployment benefits, could be another aim. Building on this, the Global Compact for Migration (GCM) signed by 152 countries, highlights key areas for improvement. It suggests for recommendations to be

[27] Venkateswaran P.K., Dr. Geni Phillipose, (2025) An Analysis of the Effectiveness of International Human Rights Instruments in Protecting the Rights of Migrant Workers. Journal of Neonatal Surgery, 14 (16s), 404-410.

[28] Goel, Vaibhav, and Manoj Kr. Tripathi. (2010) "The Role of NGOs in the Enforcement of Human Rights: An Overview." The Indian Journal of Political Science, vol. 71, no. 3, 769–93.

[29] Florida Arrinaj, (2025) 'The necessity of a new approach in the legal migration policies of the EU due to discrimination in the labor market, considering the post-Covid 19 context', European Journal of Economics, Law and Social Sciences, 9(1), 1–10.

successful, they need to be grounded in labour market realities, with clearer employer responsibilities and stronger protections. A more practical, incremental approach is needed to create sustainable migration pathways and ensure better integration for workers.[30]

Conclusion

Overall, this essay critically analyses the statement through the evaluation of low-paid migrant workers, temporary worker programmes, and the use of case studies. Temporary worker programmes, rather than safeguarding participants, frequently perpetuate exploitative conditions and exclude migrant workers from substantive legal protection in practice. The inconsistent application of domestic and international labour standards reveals structural limitations in the pursuit of fairness, justice, and equality. The exclusion of vulnerable workers is therefore not accidental but structurally embedded within labour and immigration law. To achieve meaningful reform, states must reinforce enforcement mechanisms and ensure the principles enshrined in the ICRMW are realised in practice as well as in legislation.

[30] Phillip Martin and Martin Ruhs (2019) 'Labour Market Realism and the Global Compacts on Migration and Refugees', International migration, 57(6), 88–90.