UNIVERSITÀ DEGLI STUDI DI PADOVA

Università degli Studi di Padova

Dipartimento di Scienze Storiche, Geografiche e del Mondo Antico

Dipartimento di Filosofia, Sociologia, Pedagogia e Psicologia Applicata

Corso di Laurea Magistrale in Scienze Storiche

Mobility Studies

Tesi di Laurea

Producing Immobility: Compound Control and Tactical Agency Among Migrant Domestic Workers in Lebanon's Kafala System

Relatrice:

Prof. Francesca Vianello

Co-relatrice:

Chiara Rabbiosi

Laureanda

Nour AlDaouk

n° matr. 2106185

Anno Accademico 2025/2026

Abstract

Producing Immobility: Compound Control and Tactical Agency Among Migrant Domestic Workers in Lebanon's Kafala System

This study investigates how migrant domestic workers (MDWs) experience, navigate, and resist Lebanon's kafala (sponsorship) system, which connects workers' legal residency to individual employers, creating "racialized institutional humiliation" (Fernandez, 2021) or "modern slavery" (ILO, 2020b). Despite decades of advocacy, kafala persists and MDWs remain excluded from Lebanese Labour Law protections.

Through feminist and interpretive epistemologies, this qualitative study centers workers' voices via in-depth interviews with ten participants from Kenya, Nigeria, Sierra Leone, the Philippines, Madagascar, and Sri Lanka. The research investigates: (1) How do MDWs engage in employment under kafala? (2) What resistance strategies do they employ? (3) How do experiences shape their understanding of mobility, agency, and labor relations?

Results showed that the kafala system is sustained through a compound immobilization framework, where several mechanisms work together simultaneously: recruitment deception, passport confiscation, physical confinement, economic exploitation, medical neglect, and control of communication. The mechanisms are constitutive, meaning that workers are not able to escape without their documents, are not able to access their confiscated documents without their employer's cooperation, are not able to demand cooperation without financial autonomy, and are not able to demand cooperation without risking deportation.

Despite these limitations, workers were shown to have demonstrated tactical agency through a form of strategic resistance, which included workers' calibrated compliance, escape planning, and building networks with embassies and digital technologies. Workers also developed an experiential jurisprudence, which is a form of theory that is informed by workers' experiences, and this is characterized by a critique of kafala as a system that promotes ownership, as well as workers' demands for transformative change.

The research offers three theories with conceptual ideas: compound immobilization demonstrates how all these different approaches add up together to create a sense of inescapability; tactical agency emphasizes how workers find ways to act within the limitations they are confronting; and finally, experiential jurisprudence underscores workers' own analysis as a source of legitimate knowledge. In relation to policy, the findings highlight a broad-based reform framework that is built around workers' experiential jurisprudence, using workers-centered models and with workers alongside governments and the ILO.

Keywords: kafala system; migrant domestic workers; Lebanon; immobility; compound immobilization; tactical agency; experiential jurisprudence

SOMMARIO

Le rappresentazioni delle lavoratrici domestiche migranti si basano spesso su narrazioni vittimistiche, trascurando l'agency delle lavoratrici e le loro concettualizzazioni di libertà e dignità. Questa tesi esplora come le lavoratrici domestiche migranti sperimentano, navigano e resistono al sistema kafala in Libano.

Dall'intersezione di migration studies e mobility studies, emerge il concetto di immobilizzazione composta, che dimostra i molteplici meccanismi che operano simultaneamente per intrappolare le lavoratrici. Il sequestro del passaporto, il furto salariale, la reclusione fisica e il controllo delle comunicazioni sono meccanismi costitutivi: le lavoratrici non possono fuggire senza documenti, non possono recuperare i documenti senza cooperazione del datore di lavoro, non possono esigere cooperazione senza indipendenza finanziaria, e non possono denunciare abusi senza rischiare deportazione.

La ricerca si basa su interviste in profondità con dieci lavoratrici provenienti da Kenya, Nigeria, Sierra Leone, Filippine, Madagascar e Sri Lanka. I risultati mostrano che le lavoratrici esercitano agency tattica—resistenza strategica attraverso compliance calcolata, pianificazione di fughe e costruzione di reti—trasformandosi in forme di difesa collettiva. Le lavoratrici hanno sviluppato giurisprudenza esperienziale, criticando la kafala come sistema che crea proprietà ("non si può possedere un essere umano") e articolando riforme concrete.

La ricerca dimostra che le analisi delle esperienze delle lavoratrici costituiscono contributi teorici autorevoli essenziali per sviluppare strategie di riforma efficaci.

Parole chiave: sistema kafala; lavoratrici domestiche migranti; Libano; immobilità; immobilizzazione composta; agency tattica; giurisprudenza esperienziale

Table of Contents

Abstract **2**

SOMMARIO **4**

Dedication **8**

Acknowledgments **8**

Introduction **10**

Chapter 1 Literature Review - The Kafala System and Migrant Domestic Workers **13**

1.1 Historical Development and Regional Context of Domestic Work in the Arab States 15

1.1.2 Mediterranean Regional Dynamics and Historical Transformations 19

1.2 Legal Structures and the Kafala System 23

1.3 Exploitation, Working Conditions, and Social Isolation 26

1.4 Bureaucracy, Coercion, and Racialised Governance of Mobility 29

1.5 Gendered, Reproductive, and Social Dimensions of Vulnerability 31

1.6 Strategies of Resistance and Negotiation 33

1.7 Reforming the Kafala: Challenges and Opportunities 35

1.8 Synthesis 38

Chapter 2 The Lebanese Context – Law, Regulations, and Conditions of Migrant Domestic Workers **40**

2.1 Historical and Socioeconomic Context of Migration in Lebanon 40

2.2 The Kafala System: Legal, Structural, Gendered, and Racialized Governance 42

2.3 Recruitment, Bureaucracy, and Institutional Mechanisms of Control 46

2.4 Social, Cultural, and Intersectional Dimensions of Vulnerability 47

2.5 Reform Prospects, Structural Obstacles, and the Path Forward 59

2.6 Synthesis and Implications for the Lebanese Context 60

Chapter 3 Methodology **63**

3.1 Introduction 63

3.2 Research Design 63

3.3 Sample/Participants 64

Table 3.1 Socio-Demographic Characteristics of Participants 65

3.4 Data Collection Methods 66
3.4.1 Semi-Structured Interviews 66
3.4.2 Setting and Recruitment 67
3.5 Philosophical and Epistemological Position 68
3.6 Data Analysis 68
3.7 Ethical Considerations 70
3.8 Limitations 70
3.9 Use of Artificial Intelligence Tools 71
3.10 Conclusion 71
Chapter 4 Findings 72
Introduction 72
PART I: ENGAGING WITH THE KAFALA SYSTEM 72
Recruitment Deception and Financial Exploitation 72
Passport Confiscation at Arrival 73
Physical Confinement 74
Degrading Living Conditions 75
Economic Exploitation and Wage Theft 76
Medical Neglect 79
Communication Control and Social Isolation 80
PART II: STRATEGIES OF NAVIGATION AND RESISTANCE 82
Everyday Resistance 82
Building Networks of Support 85
Desperation and Survival 86
Transformation Through Advocacy 87
PART III: RECONCEPTUALIZING MOBILITY, AGENCY, AND LABOUR RELATIONS 89
Freedom as Mobility and Autonomy 89
Labor as Dignity and Respect 90
Chapter 5 Discussion 93
5.1 Introduction 93
5.2 Engaging with Kafala: Mechanisms of Immobilization 95
5.2.1 The Architecture of Control: From Recruitment to Arrival 95
5.2.2 Physical, Social, and Economic Immobilization 96
5.2.3 Economic Exploitation, Medical Neglect, and Communication Control 98
5.2.4 Synthesis: The Compound Architecture of Kafala Immobilization 100
5.3 Strategies of Navigation, Resistance, and Survival 101

5.3.1 Everyday Resistance: Strategic Compliance and Calculated Defiance 101
5.3.2 Building Networks: Embassies, Allies, and Collective Solidarity 103
5.3.3 Desperation, Breaking Points, and Transformation Through Advocacy 105
5.3.4 Synthesis: From Tactical Resistance to Collective Transformation 107
5.4 Reconceptualizing Freedom, Dignity, and Labor Relations 107
5.4.1 Freedom as Physical Mobility: Understanding Through Absence 108
5.4.2 Labor Relations as Ownership: Deconstructing Kafala's Logic 109
5.4.3 Synthesis: Exploitation as Generator of Critical Consciousness 111
5.5 Theoretical Contributions and Implications 112
5.5.1 Compound Immobilization: Theorizing Kafala's Architecture 112
5.5.2 Tactical Agency: Rethinking Resistance Under Constraint 113
5.5.3 Experiential Jurisprudence: Workers as Theorists 113
5.5.4 Situating Lebanese Kafala and Mobility Studies Implications 114
5.6 Limitations and Future Research 115
5.7 Conclusion 116
Chapter 6 Conclusion 118
6.1 Restatement of Research Purpose 118
6.2 Summary of Key Findings 119
6.3 Theoretical and Empirical Contributions 122
6.4 Implications for Policy and Practice 123
6.5 Limitations 125
6.6 Recommendations for Future Research 126
6.7 Final Reflections 127
References 129
APPENDIX A 134
APPENDIX B 137
Purpose of the Study 137
What Participation Involves 137
Voluntary Participation 137
Confidentiality and Anonymity 138
Risks and Benefits 138
Consent Statement 138
APPENDIX C 140

Dedication

To the brave and unwavering women who have left their homes in search of a better future, only to find themselves trapped in a system that denies them their freedom and dignity, this is for you.

Your strength in the face of injustice, your silent endurance, and your unbreakable spirit deserve to be seen, heard, and honored. No one should have to fight for the right to be treated as human, yet you do so every day.
May this work be a small tribute to your struggles, a recognition of your worth, and a call for the justice you so rightfully deserve.

Acknowledgments

This thesis would not have been possible without the extraordinary people who carried me through every moment of doubt and celebrated every small victory along the way.

To **Professor Francesca Vianello**, my supervisor, thank you for your invaluable guidance, patience, and insight throughout this research journey. Your commitment to rigorous scholarship and to centering marginalized voices shaped this work profoundly. I am deeply grateful for your mentorship and for pushing me to think more critically and write with greater courage.

To **my mother**, thank you for your support throughout my academic journey and for making the effort to be present at my graduation. I appreciate all that you have done to help me reach this milestone, and I'm glad you'll be there to witness this achievement.

To **Sena**, who walked into my life in our first year of university and, a year later, became far more than a friend; you became my sister. Through every late night, every breakdown, and every breakthrough, you were there, pushing me forward when I couldn't find the strength myself, believing in me even when I stopped believing in myself. All those hours at Aula Studios, the endless coffee breaks, the silent understanding when words weren't enough; they are woven into every page of this work. *Sen benim canım kardeşim oldun.* I am so deeply grateful for your presence in my life. Without you, I truly would not have made it here.

To **Moe**, my anchor, my constant. I could never have done this without you. From Lebanon to Italy, across every distance and every obstacle, you have been there. From the very first day I arrived in this foreign place, you looked out for me, lifted me up, and reminded me why I started this journey. No matter how many kilometers separated us, you were always just one call away, always showing up, always there. Your unwavering belief in me became the foundation on which I built this work. This entire experience, every struggle, every triumph, would not have been the same without you. Thank you for being my home away from home.

To my sister, **Layal**, who listened to every frustrated rant, every moment of homesickness, every fear I couldn't voice to anyone else. You absorbed my struggles as if they were your own and gave me the words I needed to keep going. Your strength became mine when I had none left. Thank you for holding space for me, always.

To **Nardin**, meeting you in Italy was a gift I didn't know I needed. Your warmth wrapped around me like a blanket on the hardest days, your humor lifted me when everything felt heavy, and your steady presence reminded me I wasn't alone. You made Italy feel less foreign, less isolating. Thank you for your kindness, your light, and for being a beautiful part of this chapter of my life.

To **Alayyan** and **Wehbe**, who made me feel at home the moment I met you. You brought laughter when I needed it most, offered wisdom when I was lost, and showed up with a generosity of spirit that I will never forget. You became the brothers I never had, and your support carried me through more than you know. Thank you for your kindness, your humor, and for being there with open arms and open hearts.

To each of you, you didn't just help me complete this thesis. You reminded me that I am not alone, that I am loved, and that I am capable of more than I ever imagined.

From the deepest place in my heart, **thank you**.

Introduction

Migrant domestic labor is a highly feminized, often racialized, and precariously structured segment of the international labor market. There are approximately 11 million international migrant domestic workers across the globe today, 73% of whom are female (Gallotti, 2015). In Lebanon, migrant domestic workers (MDWs) constitute 76% of all people working outside their country of origin, primarily from Ethiopia, Kenya, the Philippines, Bangladesh, and Sri Lanka (MoL, 2019, as cited in Mehzer et al., 2021). These workers are essential to Lebanese households in the absence of public welfare systems (Fakih & Marrouch, 2014).
The kafala (sponsorship) system connects workers' legal residency to individual employers through sponsorship of work and residence permits (Khan & Harroff-Tavel, 2011; Fernandez et al., 2023). This system is said to produce an "institutionalized dependency" (Jureidini, 2009), a form of "racialized institutional humiliation" (Fernandez, 2021), or what has been termed "modern slavery" in some studies (ILO, 2020b; Amnesty International, 2019). The situation of migrant workers is characterized by their inability to switch employers, move for employment, or leave the country without the approval of their sponsor (Pande, 2013). Lebanon's Labour Law has an Article 7 that excludes domestic workers from the coverage of minimum wage, work hours, rest days, workplace safety, social security, and unionization (Mehzer et al., 2021).

Lebanon's compounding crises—2019 financial collapse, COVID-19, 2020 Beirut explosion, 2023-2024 war—have intensified vulnerabilities, with employers abandoning workers, shelters overwhelmed, and state institutions prioritizing Lebanese citizens over migrants (Block et al., 2024; Sensenig, 2025).

Despite the extensive research that has examined the exploitation of migrant domestic workers (MDWs), which has included studies by Pande (2013), Fernandez (2021), and others, the existing literature has largely conceptualized MDWs as victims, which has overlooked their agency and their capacities for resistance (Pande, 2012; Fernandez, 2024). The existing literature, therefore, has five gaps: (1) insufficient attention has been given to how MDWs experience and conceptualize freedom, mobility, and dignity; (2) insufficient understanding has been demonstrated with regard to the concept of compound exploitation and compound immobilization; (3) insufficient understanding has been demonstrated with regard to the process of transformation from individual

resistance to collective mobilization; (4) insufficient attention has been given with regard to the development of critical consciousness among MDWs; and (5) insufficient attention has been given with regard to the specific Lebanese context, which has a weak state, crises, and sectarian citizenship.

This research centers workers' perceptions and experiences, investigating:

RQ1: How do MDWs engage in employment under kafala?

RQ2: What strategies of coping, navigation, and resistance do they employ?

RQ3: How do lived experiences shape their understanding of mobility, agency, and labor relations?

The present research makes three theoretical contributions. First, **compound immobilization** explains the interplay between multiple control strategies used by employers, which include passport confiscation, wage theft, confinement, and restrictions on communication. For example, workers are not able to escape without documents, not able to retrieve documents without employers' cooperation, not able to coerce employers without financial autonomy, not able to achieve financial autonomy without receiving wages, and not able to report employers without risking deportation. Second, **tactical agency** provides an explanation of workers' agency within the set parameters by moving beyond the binary opposition of victim and resister. Third, **experiential jurisprudence** acknowledges workers' theoretical analyses of the kafala regime, which include workers' arguments that the regime constitutes ownership ("by no means can you own a human being") and that it constitutes "modern slavery," and positions them against the traditional dichotomy between theory and practice.

Empirically, this study follows the entire trajectory of recruitment deception to advocacy through a series of in-depth interviews with ten female migrant domestic workers from Kenya, Nigeria, Sierra Leone, the Philippines, Madagascar, and Sri Lanka (2024-2025). The study reveals the institutionalized confiscation of passports at Beirut airport, the tactical practices of the women as strategic compliers through networks of embassies and digital technologies, and finally, their turn towards collective action through the creation of organizations and networks.

In terms of methodology, the current study is grounded in feminist and interpretive epistemologies, with the participants portrayed as experts. Being Lebanese with three years of hands-on experience with MDWs, the current study's positionality helped build trust and ensured access, but it also called for reflexive practice, such as journaling and memo-writing, to ensure that the voices of the workers remained central to the construction of knowledge. Quotes were verified verbatim from the data, with no fabrication or alteration of quotes occurring.

In terms of policy implications, the current study is grounded in the analyses provided by the workers, and it is hoped that the policy implications of the current study can be supported by the analyses. The policy implications include the abolition of the kafala system and the issuance of work permits; full coverage of the Labour Law; criminalization of passport confiscation with sanctions; accessible complaint mechanisms with protection against deportation; healthcare; regulation of recruitment, including no charges to workers; citizenship of children of migrant mothers; and workers' right to organize.

Chapter 1 reviews literature on kafala and migrant domestic work globally and regionally. **Chapter 2** examines Lebanon's historical, legal, and socioeconomic context including Article 7 exclusion and compounding crises. **Chapter 3** details the qualitative methodology including epistemological foundations, semi-structured interviews, thematic analysis, ethical considerations, and researcher positionality. **Chapter 4** presents findings organized by research question: mechanisms of control (recruitment deception, passport confiscation, confinement, economic exploitation, medical neglect, communication control); resistance strategies (everyday resistance, network-building, advocacy transformation); and reconceptualizations (freedom as mobility, labor as dignity not ownership). **Chapter 5** situates findings within existing scholarship and develops the three theoretical contributions. **Chapter 6** synthesizes key findings, discusses policy implications grounded in workers' demands, acknowledges limitations, recommends future research, and concludes with workers' visions for labor relations based on dignity and the principle that humans cannot be owned.

Chapter 1
Literature Review - The Kafala System and Migrant Domestic Workers

Migrant domestic work is a globally important but structurally marginalized form of labour, primarily performed by women employed in low-income contexts (Puig-Ferriol Cabruja, 2021; Robinson, 2020, cited in Puig-Ferriol Cabruja, 2021). It sits at the intersection of gendered labour hierarchies, economic dependency, and legal precarity, rendering workers largely invisible within national labour systems. As a result, women migrant domestic workers (WMDWs) experience systemic vulnerabilities tied to exclusion from labour protections, employer domination, economic dependence, and social isolation. These vulnerabilities are intensified under the *kafala* system, which binds a worker's legal residency and employment to a single sponsor, reinforcing power asymmetries and constraining labour and social mobility (Puig-Ferriol Cabruja, 2021; Kuzbari, 2018; Ghaddar et al., 2020; Pande, 2013; Fernandez et al., 2023).

Migration also offers important economic opportunities: sending countries benefit from reduced unemployment and remittances, while receiving countries fill low-wage sectors avoided by local labour (Chammartin, 2004). However, migration simultaneously carries risks of exploitation by employers, recruitment agencies, and intermediaries. Recent scholarship, including Fernandez (2021), reframes *kafala* not only as an economic or legal structure but as a system of racialised institutional humiliation. This conceptual shift casts *kafala* as a mechanism that entrenches immobility and domination across race, gender, class, and citizenship. Parallel to this, scholarship increasingly situates migrant workers' rights as women's rights, highlighting how domestic labour exploitation intersects with global inequalities (Mehzer, Nassif, & Wilson, 2021).

Building on these perspectives, Marchetti, Cherubini, and Garofalo Geymonat (2021) argue that domestic work has historically been rendered invisible and undervalued, disproportionately carried out by women from marginalized and racialized backgrounds. They frame domestic work within global structures of gendered, racialized, and classed inequalities, where legal exclusions and structural dependencies reflect broader labour migration regimes such as *kafala*. In this view, domestic work is not precarious by accident but is a direct product of global political-economic systems that rely on the feminization and racialization of care labour.

Saravanamuttu (2018) situates these global processes within the Gulf Cooperation Council (GCC) context, one of the world's most extreme examples of migrant labour precarity. She argues that labour migration is shaped by global capitalist transformations and state-led development agendas that generate a heavy dependence on migrant labour. Applying a feminist historical materialist lens, she demonstrates how migrant women's domestic labour is central to capital accumulation, class formation, and the reproduction of households in both origin and destination countries.

Beyond these structural factors, emerging migration literature emphasizes the importance of household-level and cultural dynamics in sustaining demand for migrant domestic labour. Asiimwe and Musinguzi (2024) note that households in the GCC hire domestic workers not only because of economic need but also for reasons tied to social status, gender norms, and cultural expectations surrounding household respectability. This aligns with insights from Kelly, Follett et al. (2022, as cited in Asiimwe & Musinguzi, 2024), who argue that domestic labour in the Gulf is reinforced by cultural norms that associate hired help with social prestige.

Domestic labour demand also responds to seasonal and social rhythms. Times of heightened household activity, such as Ramadan, create additional demand, reflecting what Skeldon (2012, cited in Asiimwe & Musinguzi, 2024) calls a "structural pull" within expanding service economies. Moreover, bilateral labour agreements (BLAs), such as the Ugandan–Saudi BLA, institutionalize recruitment pathways and secure a continued supply of workers to meet household demand (Chilton & Woda, 2022, cited in Asiimwe & Musinguzi, 2024). Together, these insights demonstrate that domestic labour demand in GCC states arises not only from labour market structures or legal regimes, but also from cultural, economic, and institutional factors that construct domestic work as both a necessity and a marker of social status. The kafala system establishes these familial relations by adding to what Thiollet refers to (2021, cited in Beaugrand & Thiollet, 2023) as "migration rent," or a structural economic benefit to citizens, which is akin to oil rent in Gulf political economies, in that citizens earn material benefits from facilitating or employing migrants. This system reproduces the segregation between nationals and expatriates, while affording citizens with material citizenship benefits, thus making the hiring domestic workers not merely a convenient household service but a normalized citizenship benefit. Gulf states have an explicit policy of non-integration among the migrant population (Beaugrand, 2010; Thiollet & Assaf, 2021, in Beaugrand & Thiollet, 2023). This generates the kind of "exclusionary contexts"

scholars identify, and in which the embedded structure is temporary foreign labor, but socially and politically there is separation from national society.

Despite marked increases in the last ten years, female labour force participation among GCC national citizens remains low, averaging 31% in 2016 across the region, with rates ranging from 18.3% in Saudi Arabia to 40% in Kuwait (Tayah & Assaf, 2018). While female participation in Qatar was 58% in 2018, the share of Qatari women was only 37%, with national women representing just 2% of the total workforce (Liloia, 2023). These statistics suggest that the demand for domestic help in the Gulf is not primarily caused by women's labour force participation, nor is it based on women living independently of the family (Tayah & Assaf, 2018). Caring for children in GCC families is socially constructed and a familial responsibility assigned to women. Mothers and female kin are viewed as responsible for early social development and care, while fathers are viewed as family providers (Tayah & Assaf, 2018).

Social pressures for women to work coincide with earning more education and money; these pressures diminish a woman's capability to manage the work-care interface, and in many cases either intergenerational households disperse, or nuclear families do not include extended families, and therefore women do not have the same access to family for support (Tayah & Assaf, 2018; Crabtree, 2007, as cited in Tayah & Assaf, 2018). In this context, employing a domestic worker can be perceived as conflicting with family values in Arab countries, particularly when workers perform caregiving functions traditionally reserved for family members. National and Arab expatriate employers often resolve this tension through close supervision of domestic workers, maintaining their role as care managers rather than fully outsourcing care which is a pattern common to familial care cultures (Tayah & Assaf, 2018).

1.1 Historical Development and Regional Context of Domestic Work in the Arab States

1.1.1 Global Historical Patterns: Racialization, Gender, and Migration in Domestic Work

In Western Europe, North America, and the Mediterranean region, and subsequently in the Gulf states, the involvement of women in domestic work has historically paralleled hierarchies that are social, racialized, and economic in nature. Domestic workers were initially hired from among local women or other women migrants from nearby regions, often falling within informal contexts or kin-based networks (Bechtold et al., 2022; Human Rights Watch, 2010). Over time,

as economic globalisation, shortages of workers, and socio-political changes influenced domestic work, there was a greater reliance on women from distant low-income countries. Domestic work has emerged as a global phenomenon, with large numbers of women from poorer countries leaving their families to work as domestic workers in wealthier nations, often facing hazardous journeys in the process (Anderson, 2000, as cited by Odeku, 2014). Most domestic workers are women and girls from poorer communities (Hondagneu-Sotelo, 2007; Lutz, 2002).

The employers' decision-making in hiring workers is not purely based on economic factors but is also influenced by social perceptions about appropriateness of labour in which nationality is sometimes a preferred social marker based on racialized and gendered assumptions about obedience and reliability or moral probity (Block et al., 2023; Bechtold et al., 2022). Fernandez (2021) notes, "the process of racialization [is] central in creating an 'other' of citizenship, that bears the hierarchies of servitude that lend meaning to, and organize, the global migration regime." In this reality, the bodies of Africa and Asia are simultaneously sought and devalued, and treated as submissive, compliant, and disposable. As a result, race-based inequalities contribute to the societal devaluation of domestic work; stigma results in a lack of local participation in the sector, thus, ensuring the sector relies on migrant labour.

The transformation of domestic labour markets has been closely associated with the processes of globalisation, which has facilitated the movement of capital, goods, and labour across borders, resulting in profound social stratification within host societies (ILO, 2002b, as cited in Destremau, 2007). Migrant workers, particularly women, are disproportionately concentrated in low-paid, undervalued sectors, reinforcing pre-existing racial and gender hierarchies (Anderson, 1998, as cited in Destremau, 2007). This pattern is not random but shaped by both historical and contemporary structures of inequality, which dictate who is deemed suitable for domestic and care work (Steinhilber, 2003, as cited in Destremau, 2007). Consequently, domestic labour markets become a site where global economic processes intersect with local social stratifications, producing a racialised division of labour that privileges some groups while marginalising others (ILO, 2002b, as cited in Destremau, 2007).

The racialisation of work is also linked to perceptions of skill and morality, which serve as mechanisms for legitimising differential treatment and pay (Anderson, 1998, as cited in

Destremau, 2007). Migrant women, often constructed as inherently suited for domestic tasks due to gendered and racialised stereotypes, experience systemic exclusion from formal employment protections and career progression (Steinhilber, 2003 as cited in Destremau, 2007). The domestic labour market is highly stratified along racial, ethnic, and national lines, which directly impacts remuneration and social valuation of work (Anderson, 2000, as cited in Destremau, 2007; Lutz, 2001, as cited in Destremau, 2007). Migrant women from specific regions are often "raced" into domestic work, reproducing historical hierarchies and limiting upward mobility (Lan, 2003, as cited in Destremau, 2007).

Global Care Chains and the Feminization of Reproductive Labor

The structure of gendered expectations and labour globally assigns domestic and caregiving responsibilities to women, which results in the systematic undervaluing of women's work. This is referred to as the "global care-chain"; the women who bear the responsibility for care labour transfer it from their communities to households in wealthier countries, illustrating structural inequalities of gender, class, and geography (Hochschild, 2000 cited in Mehzer, Nassif, & Wilson, 2021; UN Women, 2016 cited in Mehzer, Nassif, & Wilson, 2021). Domestic workers enable the paid work of their employers by taking on household drudgery and childcare, often without adequate remuneration (Ally, 2011, as cited by Odeku, 2014). The international demand for domestic labour intersects with cultural and gendered preferences in host countries, often transferring the burden of unpaid household labour from more privileged women onto vulnerable migrant women (Andall, 2000; Glenn, 1992, as cited in Destremau, 2007).

Inequality is pervasive in domestic work, reflected both in the nature of the tasks performed and in the social treatment of workers, who are often looked down upon and excluded from opportunities for dignified, value-added employment (Eichler & Albanese, 2007; Glenn, 2002, as cited by Odeku, 2014). Domestic workers, despite forming one of the largest sectors of working women, face structural obstacles in formalizing their labour because their work takes place in private households (Fish, 2006, as cited by Odeku, 2014).

The Feminization of International Migration

International migration has become increasingly feminised, with women now constituting more than half of global migrants, a pattern documented by international statistical sources (OECD; UN Population Division as cited by Destremau 2007). This feminisation is not merely demographic: women are increasingly migrating independently for work rather than through family reunification schemes (Moreno Fontes Chammartin, 2004, as cited by Destremau, 2007). Globalisation has fostered an international division of labour in domestic work, characterised by the movement of women from less economically developed countries to wealthier nations, often to fill labour shortages in private households (ILO, 2002b, as cited in Destremau, 2007). This migration is shaped by global economic inequalities, where women's labour is both demanded and commodified according to the needs of wealthier households (Anderson, 1998, as cited in Destremau, 2007).

The C189 Process and International Labor Standards

The global visibility of paid domestic work expanded dramatically between 2008 and 2018 due to a process described as the "C189 process" (Marchetti et al., 2021). It started with the ratification of the International Labour Organization Convention No. 189, concerning Decent Work for Domestic Workers in 2011, and thus placed the process within the context of a pivotal moment in establishing international standards in paid domestic work based on the assertion that domestic work too is valid labor worthy of equal rights protections. The introduction of international labour standards, including the Domestic Workers Convention No. 189 and Recommendation No. 201, emphasizes equal rights, protections, and fair conditions for domestic workers worldwide (ILO, 2011; Mantouvalou, 2012).

However, the tempo of the C189 process is uneven, with Latin American and some Asian states being at the forefront of embracing the process and laggards being in Europe and the Middle East, where domestic work is claimed as social, cultural, and economic, reflecting deep-seated social and cultural hierarchies. As Marchetti et al. (2021) highlight, feminist and labor movements have increasingly converged in this area, combining gender and worker rights with migration and racial justice, what the authors call "intersectional activism," that questions the gendered and colonial hierarchies underlying paid domestic work. Feminist scholars have demonstrated that women's unpaid and mostly underpaid labor supports capitalist economies and remains undervalued due to

inequities of gender and race through concepts like reproductive labor, care economy, or global care chains. In addition, the struggle of domestic workers demonstrates the historical and ongoing feminization of social reproduction, a phenomenon that has become increasingly transnational (Marchetti et al., 2021).

Contested Definitions and Regulatory Implications

Definitions of "domestic work" are themselves contested, with implications for regulation in determining who is a worker and who counts as a worker according to the law. This ambiguity is an exact mirror of what happens under kafala systems where the work of domestic workers is treated as a private family agreement instead of an employment contract (Marchetti et al., 2021). Globally, domestic work is largely informal, with workers facing low pay, unsafe conditions, limited social protection, and weak legal coverage (ILO, 2014, as cited by Odeku, 2014). Informality is not inherent to domestic labour but is socially and politically constructed to maintain a supply of cheap, controlled labour (Destremau, 2007).

1.1.2 Mediterranean Regional Dynamics and Historical Transformations

The 1980s Revival and Structural Drivers

Domestic work experienced a significant revival since the 1980s, contradicting earlier expectations that household technologies would eliminate household service (Sarti, 2005, as cited by Destremau, 2007). Destremau (2007) attributes this resurgence to rising female employment, demographic ageing, inadequate public care infrastructures, and the declining social value of housework. Local women's increasing access to education and formal labour markets leads them to reject domestic service, which in turn generates rising demand for foreign workers (Miranda 2003; Oso 2000; Jureidini 2004 as cited by Destremau, 2007). The result is an expanding reliance on migrant women who fill roles that nationals increasingly avoid (Destremau, 2007).

Destremau conceptualises domestic labour in the Mediterranean as shaped by overlapping axes of vulnerability grounded in gender, race, ethnicity, migration status, and labour position. In her analysis, global economic restructuring and the erosion of welfare provisions push households to externalise reproductive work while simultaneously reducing regulatory protections for those who

perform it. The consequence is a structurally precarious labour market in which domestic workers, especially migrants, are highly exposed to exploitation. Studies highlighted by Destremau identify an increasing internationalisation of domestic labour markets and a marked feminisation of migration flows into this sector (Destremau, 2007).

Regional Differentiation: Three Mediterranean Models

Destremau (2007) develops a comparative typology distinguishing three clusters of Mediterranean countries based on labour market structure, welfare systems, migration patterns, and cultural constructions of household labour. The first cluster comprises countries with high female labour participation and partial welfare support, such as France, which are characterised by long-standing female labour force participation and state-supported care infrastructures (Destremau, 2007). In these contexts, shrinking public services and demographic change produce increasing demand for domestic workers, but employment largely takes place on a live-out, hourly basis, filled by long-settled or second-generation migrant women. Historical waves of domestic workers, from rural French women to Southern Europeans and North Africans, have progressively exited the sector, making domestic labour a point of entry for newer migrant arrivals (IRCEM, 2002, as cited by Destremau, 2007). While domestic labour remains low-status in these countries, it does not rely heavily on live-in migrant arrangements.

The second cluster, encompassing Southern Europe, Lebanon, occupied Palestine, Turkey, and Egypt, represents a labour market increasingly reliant on live-in migrant domestic workers amid conditions of low female labour participation with rising demand for domestic services (Destremau, 2007). Rising standards of living, demographic ageing, and insufficient public services create high demand, while local women reject domestic service due to increased education and social expectations. In some cases such as Lebanon, the domestic labour market expands as a status symbol rather than solely an economic necessity. Migrant women from Sri Lanka, the Philippines, and other sending countries become structurally embedded in highly exploitative live-in roles within this model.

The third cluster maintains traditional domestic servitude and child labour systems, particularly in Morocco, and to a lesser extent Algeria, Tunisia, and rural Egypt (Destremau, 2007). These

countries maintain systems of quasi-familial servitude where young girls from rural or impoverished families work in urban households. In these contexts, domestic labour is deeply embedded in longstanding class, rural-urban, and gender hierarchies. Migrants play a minimal role, as local supply remains sufficient to meet demand. Destremau identifies these arrangements as rooted in older patterns of domination, reinforced by contemporary poverty and inequality. Child domestic labour is frequently linked to exploitative arrangements and educational deprivation (Kapchan, 1996; Dostie & Vencatachellum, 2004, as cited in Destremau, 2007).

International Specialisation in Domestic Labour Export

Destremau's analysis reveals three distinct profiles of migrant women within the domestic labour sector. The first profile comprises long-settled spouses who entered through family reunification after post-war migration and have transitioned into hourly freelance domestic work arrangements (Destremau, 2007). The second profile encompasses women who migrate independently as part of longer-term settlement strategies, including refugees and labour migrants from Eastern Europe or Latin America. These women may initially intend domestic service as a temporary occupation but often become trapped in the sector due to limited alternative employment opportunities (Reyneri, 2001; Oso Casas, 2001, as cited in Destremau, 2007). The third profile consists of women who migrate specifically to work as live-in domestic workers for limited periods before returning home, constituting what Destremau characterises as circular or temporary migration patterns (Destremau, 2007). This latter group forms the backbone of increasingly specialised global labour-export systems that have emerged over recent decades (Destremau, 2007).

Asian countries, particularly the Philippines, Sri Lanka, Indonesia, Bangladesh, and Thailand, have become major exporters of domestic labour through what Asis calls a "gendered migration process" (Asis, 2003, as cited in Destremau, 2007). Over the last three decades, these countries saw dramatic increases in international migration: Sri Lankan migration grew 316-fold and Indonesian migration 216-fold between 1976 and 1998 (Wickramasekera, 2002, as cited in Destremau, 2007). Feminisation of migration sharply intensified, with women making up over two-thirds of migrants in most of these countries (Moreno Fontes Chammartin, 2004, as cited in Destremau, 2007).

Sri Lanka shows the strongest level of occupational specialisation: by 1995, 70% of all Sri Lankan migrants and 88.6% of migrating women worked in domestic service, compared with 40% in 1988 (Dias & Jayasundere, 2001, as cited by Destremau, 2007). Domestic work accounted for 81% of all new hires in 2000 (Moreno Fontes Chammartin, 2004, as cited by Destremau, 2007). In Middle Eastern destinations such as Lebanon, "Sri Lankiyeh" has even become a colloquial synonym for "maid," illustrating the depth of occupational association (Destremau 2007).

Filipino migration is also deeply institutionalised: the government, through the Overseas Employment Administration, manages a full-scale outmigration industry (Jaber, 2005, as cited by Destremau, 2007). Sri Lanka created a similar regulatory body in 1986, the Bureau of Foreign Employment (Destremau, 2007). Despite these institutional structures, labour-sending states face a tension between promoting migrant employment and protecting migrants from abuse abroad (ILO, 2002, as cited by Destremau, 2007).

Structural Vulnerabilities in the Mediterranean Context

According to the ILO, female domestic workers are among the most vulnerable migrant categories, alongside entertainers, trafficked persons, and irregular migrants (ILO, 1999, as cited by Destremau, 2007). Their vulnerability begins long before departure, shaped by poverty, indebtedness, gender expectations, low educational recognition, and rural origins (Destremau, 2007). Preparatory phases, like securing agents, gathering funds, obtaining documents, often expose migrants to deception and exploitation (Mozère, 2002, as cited by Destremau, 2007). Recruitment agencies and informal brokers frequently impose exorbitant fees, forge documents, or channel migrants illegally (Dias & Jayasundere, 2001, as cited by Destremau, 2007).

After arrival, migrant domestic workers face additional risks, including confiscation of documents, visa overstays, police arrest, and coercive dependence on employers or agencies (Destremau, 2007). In Lebanon, for instance, domestic workers rarely see or understand their employment contracts, which are written in Arabic, and their passports are routinely confiscated upon arrival (US Department of State, 1999, as cited by Destremau, 2007). Irregular migrants face heightened dependency and exploitation, which Anderson identifies as the key source of vulnerability (Anderson, 2000, as cited by Destremau, 2007).

The level of remuneration of domestic workers is influenced by both market mechanisms and socio-cultural valuation of labour. In countries without enforced minimum wages, abundant supplies of low-skilled migrant labour exert downward pressure on wages, often leading workers to accept compensation limited to room and board (Anderson, 1998, as cited in Destremau, 2007). Countries in the Middle East, such as Lebanon, Jordan, and Gulf states, have been noted for particularly exploitative conditions (Destremau, 2007).

Debt plays a critical role in shaping domestic workers' vulnerability. Migrants often incur debts to finance migration, which ties them to employment and reduces bargaining power (Destremau, 2007). Debt to employers, intermediaries, or family members creates mechanisms of control and quasi-servitude, with wages sometimes withheld to cover pre-existing or alleged debts. Modern slavery frameworks conceptualize these exploitative situations as combinations of intense labour exploitation and restricted freedom, including international trafficking and debt bondage (Jureidini, 2002, as cited by Destremau, 2007).

1.2 Legal Structures and the Kafala System

The kafala (or sponsorship) system is a key structure defining a WMDW's vulnerability in the Gulf Cooperation Council (GCC) states, Jordan, and Lebanon. Under the kafala system, the worker's residency and employment status depend upon a sponsoring employer (kafīl), creating what appears to be a form of regulation over labor migration (Puig-Ferriol Cabruja, 2021; Pande, 2013). However, this system institutionalizes an asymmetry of power between employer and employee, producing dependency and immobilization (Fernandez, 2021).

As a result, workers are unable to move jobs, leave the host country, or access the courts without their sponsor’s approval, effectively criminalizing mobility (Amnesty International, 2019, as cited in Puig-Ferriol Cabruja, 2021; Fernandez, 2021). Fernandez conceptualizes kafala as enforcing subordination through four interlocking mechanisms constitutive of hegemonic ideology, degradation, coercion, and state enforcement. The delegation of state authority to private sponsors forms the central mechanism of racialised labour control, creating what Fernandez calls a "diffused system of coercion" (Hertog, 2010; Longva, 1997, as cited in Fernandez, 2021).

Gallotti's (2015) observations add further context: across the Arab States, domestic workers constitute 18 percent of all migrant workers, with migrants making up over 80 percent of all domestic workers. Despite their prevalence, domestic workers are often excluded from national labour laws. This exclusion reinforces the legal precarity identified by Chammartin (2004) and Puig-Ferriol Cabruja (2021) and contributes to their systematic invisibility in labour statistics and government schemes.

At the global level, Marchetti et al. (2021) highlight that legal exclusions—such as kafala—have become "significant internationally." The International Labour Organization responded by adopting Convention No. 189 (C189), which establishes basic protections around pay, rest, and freedom of association. Still, Marchetti et al. (2021) argue that addressing entrenched hierarchies of gender, race, and class that deem migrant women "unorganizable" requires more than legal recognition. They note that C189 acted as an "external shock" that created political opportunities for domestic workers' movements worldwide. In Latin America and parts of Asia, the convention helped spur national legislation and unionization; in contrast, in Europe and the Middle East, these advances remain superficial, with widespread informal labour and private household employment. Such environments—especially under kafala—keep abuse hidden from scrutiny and hinder inspection.

Saravanamuttu (2018) provides further detail on the operation of kafala in the GCC. The system derives from the Arabic root ka-fa-la, meaning "to guarantee" or "to take responsibility for," historically associated with Bedouin hospitality (Kakande, 2015, as cited in Saravanamuttu, 2018). In its current form, however, kafala represents a stark departure from this ethos and has become synonymous with control and exploitation. By delegating authority over migrant workers to private citizens (kafeels), the state grants employers full power over workers' legal status, employment, and freedom of movement (Dito, 2015, cited in Saravanamuttu, 2018). Large recruitment agencies started to mediate sponsor-migrant relationships in the Gulf states increasingly by the late 1980s, which affected the direct employer-employee arrangement (Beaugrand & Thiollet, 2023). This was more evident when demographic changes brought more South and Southeast Asian workers that lacked common language and cultural ties with Gulf employers. The institutionalization of intermediaries changed hiring conditions for domestic work from informal arrangements to a formal market that eroded the employer's direct responsibility to the domestic worker while

enhancing the worker's structural dependence and category-based experiences of difference (Beaugrand & Thiollet, 2023).

The kafala legal framework lacks particularity and allows the employer-employee relationship to be determined by the discretion of individual sponsors (Beaugé, 1986, as cited in Beaugrand & Thiollet, 2023). This discretion fosters highly negotiable arrangements, where the dominating asymmetries of power depend on, and are the result of, a worker's nationality, degree, profession, and the sponsor's specific values and priorities. The continued absence of any real or imagined integrated regulatory framework between labor law and residency law aggravates any asymmetries of power that have been created in this fashion, creating legal grey areas where abuse and exploitation can occur (Longva, 1999, as cited by Beaugrand & Thiollet, 2023). Consequently, experiences across households vary even in similar socio-economic realities, and what Beaugrand and Thiollet (2023) describe as the arbitrary and unregulated nature of these relational interactions continues as a status quo.

This transfer of state power facilitates citizen policing and surveillance of migrant groups. Employers enforce immigration and labour regulations through practices such as passport confiscation and restricting movement (Gardner, 2010, as cited in Saravanamuttu, 2018). Gardner (2010, as cited in Saravanamuttu, 2018) characterizes this as structural violence maintained through recruitment-related debt, employer ownership of passports, language and cultural isolation, and spatial isolation. These structural conditions keep workers dependent on the sponsorship arrangement, unable to access state protection or pursue legal remedies.

According to Saravanamuttu (2018), kafala operates within larger transnational systems of dependency. The migration industry, comprising private brokers, moneylenders, and state agencies, profits from migrant labour and helps regulate and reproduce the global division of labour, thus reinforcing racialized and gendered hierarchies (Gardner, 2010, 2012; Agathangelou, 2004, as cited in Saravanamuttu, 2018). Despite international calls for reform or abolition by organizations like Human Rights Watch and the International Organization for Migration, Gulf governments largely resist change (Silvey, 2016; Gamburd, 2010, as cited in Saravanamuttu, 2018). Domestic critiques are further constrained by political and social norms, including beliefs

among Gulf citizens that kafala reinforces their economic power (Kakande, 2015, as cited in Saravanamuttu, 2018).

Saravanamuttu (2018) situates kafala within the political economy of the Gulf through Adam Hanieh's concept of Khaleeji-capital, which illustrates how GCC capital accumulation extends across the Middle East, Africa, and South Asia, linking Gulf capital to US power and global economic structures (Hanieh, 2010, as cited in Saravanamuttu, 2018). Kafala maintains state control and citizen loyalty while sustaining a low-wage migrant labour force integral to rapid capitalist growth. Selective welfare provision like generous benefits for citizens while excluding migrants reinforces loyalty, legitimizes elite rule, and maintains class and citizenship hierarchies (Hanieh, 2014, as cited in Saravanamuttu, 2018). This dual arrangement maintains social order while embedding exploitability as a feature of Gulf capitalism.

1.3 Exploitation, Working Conditions, and Social Isolation

Chammartin (2004) emphasizes the extreme vulnerability of female migrant domestic workers in Arab League countries. Domestic workers are often subjected to excessive working hours (101–108 hours per week), unpaid hours, low or withheld wages, little or no rest, restricted freedom of movement through passport confiscation, social isolation, and physical, verbal, and sexual abuse. Unlawful recruitment practices such as charging workers excessive fees or misleading them about contractual terms further heighten vulnerability. Workers frequently sign contracts in languages they do not understand and often find themselves without support from recruitment agencies and with no alternatives for protection (Chammartin, 2004).

The International Labour Organization, Regional Office for Arab States (2017) recognizes a number of variables that increase workers' vulnerability. Because employers expend financial resources upfront for travel, permits, medical testing, and insurance to recruit workers, they start to see migrant workers as financial investments that need to be protected. In some instances, employers attempt to recoup that financial investment by withholding wages or deducting financial penalties for early termination of the employment contract, even if national policies expressly prohibit fee charging to migrants. Though there are anti-passport confiscation policies in place in many countries, it continues to be a common tactic for employers to entrap migrant workers in their exploitative practices. Employers continue to use retention of passports to stop the

phenomenon they label 'absconding,' as a tactic to hold workers in exploitative situations and restrict their rights to seek justice (ILO, 2016b, cited in International Labour Organization, Regional Office for Arab States, 2017).

Gallotti's (2015) global estimates support these patterns, noting that domestic workers, primarily migrant women, are clustered in the lowest ranks of labour markets, often unprotected and minimally regulated through informal, undeclared, or live-in employment. In the Arab States, where most domestic workers are migrants, the concentration of foreign women in private households heightens invisibility and vulnerability, particularly because private homes fall outside conventional labour inspection mechanisms. This lack of oversight allows coercive practices such as passport confiscation and restricted mobility to go unchecked.

Marchetti et al. (2021) connect these exploitative conditions to larger historical systems of care and reproductive labour, arguing that exploitation arises from care being assigned to "women's work" within patriarchal and colonial histories. Devaluing care naturalizes excessive working hours, unpaid labour, and personal servitude. The privatized and intimate setting of domestic work further blurs boundaries between labour and affection, making workers more vulnerable. In kafala contexts, this intermingling rationalizes coercion by presenting it as familial responsibility or moral surveillance of care, echoing colonial servitude.

Feminist scholars referenced in Marchetti et al. (Federici, Tronto, Folbre, Hochschild) locate this exploitation within the global care economy, in which emotional, reproductive, and household labour performed by women in poorer countries sustains the welfare and economies of wealthier classes and nations. The resulting "global care chain" creates a moral economy of inequality, where the sacrifices of migrant women are obscured by narratives of love, duty, and service.

Saravanamuttu (2018) documents these patterns within the GCC. According to ILO data, domestic work is one of the world's fastest-growing industries, and women comprise the vast majority of migrant domestic workers. Domestic work constitutes a large share of female employment in the Middle East: for example, 21.9% of women were employed in domestic work in Kuwait, 12.8% in Bahrain, and 12.8% in the UAE in 2005 (ILO, 2013, cited in Saravanamuttu, 2018). Additionally, 61% of all women migrant workers in the Arab States work in domestic labour

(Tayah, 2016, as cited in Saravanamuttu, 2018). Domestic work is intensely gendered, with women performing cooking and caregiving tasks while men work as drivers or gardeners (Tayah, 2016, cited in Saravanamuttu, 2018).

Longva (1997, cited in Saravanamuttu, 2018) notes that domestic work in Kuwait is classified as "private" work, meaning enforcement of labour rights is left entirely to the employer. Similarly, Fernandez and de Regt (2014, cited in Saravanamuttu, 2018) observe that the dual status of the household as both workplace and private space enables employers to evade state involvement. Murray (2012, cited in Saravanamuttu, 2018) records multiple cases of abuse, wage theft, overwork, and mobility restrictions, particularly where employers confiscated passports.

High-profile incidents illustrate this extreme vulnerability. These include the viral video of an Ethiopian domestic worker being abused in Kuwait and the execution of an Indonesian domestic worker in Saudi Arabia, which led Indonesia to enact a temporary migration ban and Saudi Arabia to shift recruitment to poorer countries such as Nepal and Vietnam (BBC, 2017; Murray, 2012, as cited in Saravanamuttu, 2018). Saravanamuttu (2018) notes that sending states such as Sri Lanka often prioritize state interests over worker welfare due to the fear of losing remittances (Murray, 2012; Gamburd, 2010, as cited in Saravanamuttu, 2018). Gamburd (2010, as cited in Saravanamuttu, 2018) emphasizes that Sri Lanka's subordinate position in the global hierarchy limits its leverage with GCC states, whose governments ultimately determine migrant workers' conditions.

Racial hierarchies in the domestic labour market privilege Filipina and Indonesian workers above other groups, especially South Asian and African women, illustrating globalized, gendered, and racialized inequalities (Fernandez & de Regt, 2014; Silvey, 2016, as cited in Saravanamuttu, 2018). Educational differences among workers further structure this hierarchy, with Filipina workers often better educated than South Asian workers (Longva, 1997, as cited in Saravanamuttu, 2018). Even where labour reforms occur, domestic workers are often excluded. For example, UAE reforms that expanded labour mobility did not apply to domestic workers, who continue to face wage exploitation, abuse, and restrictions on movement (Silvey, 2016, as cited in Saravanamuttu, 2018).

1.4 Bureaucracy, Coercion, and Racialised Governance of Mobility

Fernandez (2021) demonstrates that the kafala's endurance lies in its diffusion of coercion. By legally empowering employers to act as micro-level agents of control, the system disperses surveillance throughout society. Passport confiscation, curfews, and confinement within homes function as routine techniques of immobilisation. Simultaneously, the state's paradoxical presence, absent in protection yet excessive in punishment, sustains the system, thus embedding disrespect and devaluation into law itself (Parekh, 2009). Administrative processes such as residence permit renewal or exit visa issuance render workers legally invisible and dependent, illustrating the bureaucratic dimensions of racialised governance (Fernandez et al., 2023).

In alignment with this analysis, Gallotti (2015) identifies a global structural dimension of bureaucratic control over migrant domestic workers' mobility. In most receiving countries, the recruitment, employment, and residence of domestic workers are mediated through sponsorship or employer-based systems that blur the line between state regulation and private governance. These administrative frameworks replicate forms of racialised governance by producing hierarchies of legal belonging: migrants are simultaneously necessary for economic functioning yet excluded from equal rights frameworks.

Workers' access to justice, under kafala arrangements, remains significantly limited. Dispute resolution and compensation processes in Middle Eastern countries are slow, inappropriate, and do not sufficiently protect migrant workers (International Labour Organization, Regional Office for Arab States, 2017). If a worker wishes to file a complaint, they often risk losing legal residency status because their immigration status is ostensibly tied to an employer to whom the worker would be filing a complaint. During the process, the legal worker often cannot work, and they do not have a visa that allows them to remain in the country while the dispute is pending resolution. Given this situation, workers are commonly inclined to accept poorer conditions, rather than pursue justice because reporting unpaid wages or exploitation could result in detention, deportation, or loss of income (International Labour Organization, Regional Office for Arab States, 2017).

Marchetti et al. (2021) propose a multi-dimensional structure for understanding these experiences: the multi-level analysis of the DomEQUAL project. The structure identifies four analytical levels of hostility to domestic workers' rights:

1. The labor sector, marked by legal and structural exclusion;

2. Organizations, which mobilize workers and create social identities;

3. Strategic action fields, which map engagement between state, civil society, and international actors; and

4. Interpretative frames, which organize how actors frame injustice and organize alliances.

In relation to kafala, bureaucratic control represents a sectoral exclusion that constrains workers' legal ability to move. The emergence of domestic workers' unions, non-governmental organization (NGO) advocacy, and international coalitions, however, represent organizational and strategic interventions that counter this exclusion. The interpretative frames, particularly those of human rights, feminism, and labor equality, allow transnational solidarity, where domestic workers are not imagined as dependents but as employees with rights.

Saravanamuttu (2018) illustrates how the Gulf States reflect these dynamics through their particular arrangement of state power and labour control. Saravanamuttu cites Anderson (2010) to emphasize that migrant non-citizenship categories in immigration regimes produce vulnerability through temporality, resulting in inhibiting migrants from becoming socially attached and socially enmeshed in the workplace (Anderson, 2010, as cited in Saravanamuttu, 2018). Migrant non-citizens, understanding the transience of the positioning of their migration status, tend to take up precarious work with little protective measures, upward mobility, or advancement opportunities, and employers exploit those precarities to stifle claims-making and resistance (Anderson, 2010; Ruhs & Martin, 2008, as cited in Saravanamuttu, 2018).

Saravanamuttu (2018) asserts that immigration regimes deliberately create irregular or non-citizen statuses that keep migrants excluded from legal and social protections, entrenched precarity, and a continuous supply of low-wage, disposable labour (Anderson, 2010; Fudge, 2012, cited in Saravanamuttu, 2018). She refers to Harsha Walia's argument (2010, cited in Saravanamuttu, 2018) that temporary migrant worker programs establish the conditions of labour relations that create an embedded exploitability because full citizenship is denied to migrants, ensuring legal possession of migrant disposability and access to cheap and deportable labour.

Workers frequently become irregular without fault through multiple pathways: employer failure to renew permits, confiscation of passports, false absconding reports, or procedural mistakes during authorized work transfers (International Labour Organization, Regional Office for Arab States, 2017). Once irregular, workers face substantial challenges rectifying their status, including accumulation of overstay fines and detention risks. While governments periodically implement amnesty programs, critics argue these fail to address the structural roots of irregularity embedded in the sponsorship system itself (Al Jazeera, 2013; Shah, 2014, as cited in International Labour Organization, Regional Office for Arab States, 2017).

In addition, Saravanamuttu (2018) builds on the notion of the "state as sheriff" developed by Torpey (1998, cited in Saravanamuttu, 2018) to highlight that Gulf states have an active role in creating distinctions between citizens and non-citizens to perpetuate migrants' "unfreedom," as a structural feature of labor regimes. In citizenship regimes in the Gulf, the distinction between citizens, who politically acquiesce, and migrant workers, who are systematically disenfranchised, is fortified (Kinninmont, 2014, cited in Saravanamuttu, 2018). Citizens enjoy prosperous public sector jobs, made possible by oil wealth, while migrants perform low wage, temporary labor under restrictive sponsorship systems that deny meaningful rights or pathways to citizenship (Hanieh, 2014, cited in Saravanamuttu, 2018). This dual nature not only serves to maintain social order, but also entrenches exploitability as a necessary condition of Gulf capitalism.

1.5 Gendered, Reproductive, and Social Dimensions of Vulnerability

Domestic work takes place in private family households, creating higher risks of abuse and surveillance for women (Puig-Ferriol Cabruja, 2021; Human Rights Watch, 2010). The kafala system further operates as a form of reproductive governance through mandatory pregnancy testing and deportation upon a positive result (Fernandez et al., 2023). These gendered exclusions are compounded by racial hierarchies, as Black and brown women face greater surveillance, degradation, and wage disparity (Fernandez, 2021; Jureidini, 2002, as cited in Puig-Ferriol Cabruja, 2021). Gallotti (2015) highlights that domestic work is one of the most feminized occupational sectors globally: approximately 80% of all domestic workers are women, and among migrant domestic workers, women account for nearly 74%. In the Arab States, six out of every ten migrant workers in domestic service are women. These figures support the argument that domestic

work is central to the "global care economy," which relies on women's cross-border mobility and reproductive labour.

Marchetti et al. (2021) situate these gendered vulnerabilities within wider feminist discussions of reproductive labour. Reproductive and care labour, predominantly performed by women of color or migrant status, constitutes the "invisible infrastructure of global capitalism." States and elites maintain gender and racial hierarchies by delegating these responsibilities to poor women. In kafala systems, this is intensified: workers' bodies are subjected to surveillance and control, embodying the intersection of gendered and racialized governance in a patriarchal economy. Marchetti et al. (2021) also note feminist contradictions, whereby middle-class feminists hire domestic workers under exploitative conditions, reproducing hierarchies among women. Similarly, under kafala, employer–employee relationships are couched in familial language but are structurally exploitative.

Saravanamuttu (2018) applies a feminist political economy perspective, drawing on Bakker and Gill (2003, cited in Saravanamuttu, 2018) to define social reproduction as involving "biological reproduction, reproduction of labour power, and social practices related to caring, socializing and meeting human needs," including public policy and welfare provisions necessary for labour force reproduction. Vogel (2013, cited in Saravanamuttu, 2018) similarly emphasizes reproduction of labour power and class relations. The precarious lives of migrant women and the reproductive labour they perform constitute key aspects of Gulf capital's production and reproduction. While male migrants dominate sectors such as construction, female domestic labour underpins the ongoing maintenance of class stratification and capital accumulation. Welfare investments for citizens like housing, healthcare, education support labour market segmentation and maintain non-citizen workers' vulnerability, enabling capital accumulation through state-administered inequities (Saravanamuttu, 2018).

Saravanamuttu (2018) further discusses the commodification and outsourcing of reproductive labour under neoliberal globalization, racializing migrant women. Farris (2017, in Saravanamuttu, 2018) frames this as reproducing both a "sexual contract," assigning reproductive activities to women, and a "racial contract," assigning undesirable labour to women of colour. Migrant women from Asia and Africa undertake reproductive labour that substitutes the unwaged domestic work

of Gulf women, enabling citizens to pursue paid work, leisure, or social status (Fernandez & de Regt 2014; in Saravanamuttu, 2018).

Agathangelou (2004, cited in Saravanamuttu, 2018) adds that migrant domestic workers' labour and personhood are commodified within capitalism, which extracts surplus value while claiming ownership of the worker. States reproduce socio-economic and political power, along with the power of bourgeois citizens, through employing migrant women for domestic and care work. Exploitation is enabled through gendered, racialized, sexualized, and hierarchical structures affecting women from the Global South.

Reproduction has a transnational dimension: the kafala system prevents migrants from gaining citizenship and social benefits, allowing Gulf states to externalize the costs of labour force reproduction. Sending states bear costs through recruitment systems, training, and remittance-dependent economies. Migrants' wages become remittances, sustaining social reproduction in sending states. Arat-Koc (2006, cited in Saravanamuttu, 2018) notes that social reproduction is privatized in the home and displaced across borders, with emotional, physical, and economic costs hidden and undervalued as female labour.

Sending states including the Philippines, Sri Lanka, and Indonesia complicitly commodify reproductive labour through labour brokerage and bilateral agreements (Saravanamuttu, 2018). Rodriguez (2010, cited in Saravanamuttu, 2018) conceptualizes this as institutionalized migration for economic strategy, mobilizing citizens overseas and profiting from remittances. Ferguson and McNally (2015, cited in Saravanamuttu, 2018) highlight that "professionalizing" domestic workers enhances their marketability as exportable labour commodities, revealing how neoliberal governance commodifies vulnerability itself as an asset.

1.6 Strategies of Resistance and Negotiation

Despite being subjected to structural control, migrant domestic workers assert their agency and act in resistance. They navigate these oppressions through informal networks, interactions with NGOs, and quiet acts of resistance via negotiations, absconding temporarily, or asserting their rights as far as they can (Puig-Ferriol Cabruja, 2021; Fernandez, 2021; Fernandez et al., 2023). Workers' agency is expressed through leadership in community organizing, advocacy, and mutual aid,

demonstrating their resilience and ability to act within constrained environments. Workers' agency may refer to leadership in community organizing, advocacy, or mutual aid showing their resilience and ability to act in a constrained environment. Indeed, Ramon Icart (2021) proposes a broader definition of resistance in conjunction with the Sustainable Development Goals. WMDWs' daily acts of caring, organizational work, and advocacy align with Sustainable Development Goal (SDG) 5, which aims to achieve gender equality and empower all women and girls (United Nations, 2015). By organizing collectively, asserting their rights as workers rather than servants, and challenging the gendered devaluation of care work, domestic workers disrupt their subordinate position as women and contest the structural inequalities that confine reproductive labor to marginalized, racialized women (Marchetti et al., 2021). Their struggles simultaneously advance SDG 8, which promotes sustained, inclusive, and sustainable economic growth, full and productive employment, and decent work for all (United Nations, 2015). Domestic workers' assertion of labour rights, demands for fair wages, and insistence on safe working conditions challenge exploitative employment practices and push for the formalization and regulation of a sector that has historically operated outside legal protections (Gallotti, 2015; ILO, 2011). Thus, from this perspective, resistance is at once an act of individual survival and a contribution to greater global goals, with the understanding that migrant domestic labour is both a means of sustaining economies and societies and a potential catalyst to dismantle the inequities from which they emerge.

Recent ethnographic studies reveal that the kafala functions not only as a mechanism of domination but also as a point of contact enabling diverse outcomes (Beaugrand & Thiollet, 2023). While the system enforces asymmetric social relations, it simultaneously facilitates long-term interpersonal relationships and, in some cases, enables second and third generations of migrants to remain through continuous contract renewals facilitated by trust between sponsor and employee. Some long-term residents have leveraged sponsor relationships to continue working beyond legal retirement or to bring family members into the country (Assaf, 2017; Thiollet, 2010, as cited by Beaugrand & Thiollet, 2023). These examples illustrate that while structural exploitation remains prevalent, individual experiences within kafala are shaped by complex social dynamics, economic incentives, and relational ties that can produce varied outcomes.

Gallotti (2015) documents collective action undertaken globally and regionally by domestic workers' unions and associations particularly throughout Latin America, Western Europe, and some Arab States. Even when systemic migration restrictions persist, organized collective action by migrant domestic workers has led to critical outcomes including standard employment contracts, mandatory protected wages, and bilateral labour agreements. These outcomes embody the process whereby grassroots resistance transforms structural immobility into political visibility. Marchetti et al. (2021) characterize these movements as "intersections in action," where domestic workers organize around overlapping forms of oppression: gender, race, class, caste, and migration. Their cultural-political activities include renaming and language-politics (rejecting derogatory terms such as “maid” in favor of trabajadora de hogar (Spanish: “domestic worker”), kasambahay(Tagalog: “household helper/domestic worker”), or colf (Italian: “domestic worker”), public awareness campaigns, theatre and performance, and media advocacy interventions that transform the social discourse of domestic work. These discursive strategies aim to establish domestic work outside historical framings of servitude and within labour, dignity, and rights-based narratives.

Practically, organizations provide legal aid, contract and pay calculation tools (e.g., Brazil's Laudelina app), savings cooperatives (UNITED in the Philippines), training in professional skills and political leadership, and mutual-support networks that reduce isolation and increase bargaining power. Such initiatives simultaneously address immediate needs and long-term political empowerment. Marchetti et al. (2021) characterize domestic workers' organizing as both pragmatic providing daily protection and resources, and transformative - creating new collective identities and transnational alliances that challenge the structural logics of kafala and the care-market more broadly. In this way, movements convert individual grievances into collective claims and transform domestic labour into an expansive social justice struggle.

1.7 Reforming the Kafala: Challenges and Opportunities

Khan and Harroff-Tavel (2011) provide an overview of the kafala system, which continues to operate in several states, including Jordan. Although its roots lie in principles of Bedouin hospitality, the kafala system now produces structural dependency and broad exploitation, particularly for domestic workers and those in service industries. Workers retain residency only

while employed by a sponsor, leaving them vulnerable to wage theft, restricted mobility, contract transfers, and human rights abuses (Baldwin-Edwards, 2011; HRW, 2007; Vlieger, 2011).

Efforts at reform throughout the Gulf have sought to limit discretion of intermediaries, reduce economic inefficiencies, and enhance administrative control over migration (Beaugrand & Thiollet, 2023). In Bahrain, mid-2000s reforms sought to limit kafala privileges in the interest of nationalizing labor markets but encountered resistance from business elites and were, for the most part, rolled back after massive unrest in 2011. Other states in the Gulf experienced trends of a similar nature with structural labor market reforms and attempts to license recruitment companies (for example in Saudi Arabia in 2012) which purposefully curtailed the capacity of intermediaries to work as middlemen. However, structures that reinforce the continued reliance on foreign (migrant) labor were still in place, owing to established economic and social interests (Thiollet, 2021, cited in Beaugrand & Thiollet, 2023). The continuation of the kafala points to intersecting economic, social and political logics and underscore the limits of state-based strategies which have facilitated the ongoing predominance of private intermediaries in the lives of migrant workers.

In its 2017 report, the International Labour Organization, Regional Office for Arab States outlines substantive policy measures for improving labour market mobility and weakening the linkage between workers and employers. Key recommendations entail separating immigration status from the names of individual employers through the use of work visas which allow workers to apply for and renew visas in their own names; or through sector-specific visas which allow workers to explore employment opportunities while remaining in a designated industry. Other measures include transferring visa renewals to workers through online services and multilingual service support; guaranteeing a right to resign without any immigration consequences; providing a grace period to allow a worker to remain legally in the country after their employer terminates them; and ensuring a worker can change employers without the consent of their current employer. The ILO report asserts that, while labour market mobility is important, these reforms must be accompanied by extending labour law protections to all workers, including domestic workers; providing written contracts with standardized terms in the language of the workers; strengthening the legal process for resolving disputes, including prompt investigations, access to legal assistance, and timely resolution; and establishing a national coordinated organizational structure to reduce fragmentation of governance, highlighting Bahrain's Labour Market Regulatory Authority

(LMRA) is often presented as a good model (Fakih & Marrouch, 2014, as cited in International Labour Organization, Regional Office for Arab States, 2017). The International Labour Organization (ILO) claims that kafala reform presents a "triple win" for governments, employers, and migrant workers because it facilitates fair migration, promotes efficiency in the internal labour market, and reduces administrative tasks for employers. This position is supported by research indicating that many employers are supportive of reform, provided that an alternative option is available (Insan Association, 2014, as cited in International Labour Organization, Regional Office for Arab States, 2017).

Gallotti (2015) notes that regional labour reforms for domestic workers vary. Some Gulf and Levant states have implemented limited protections, such as standard contracts, complaint systems, or restricted mobility rights, yet structural dependency persists because work permits remain tied to sponsors. Enforcement is often weak, particularly as private households fall outside labour inspections. Globally, domestic workers remain among the most excluded from labour rights coverage, even where reforms exist.

According to Marchetti et al. (2021), ILO Convention No. 189 (C189) functioned as a global "external shock," triggering policy changes regarding domestic workers' rights between 2008 and 2018. In Ecuador and the Philippines, collaborations among governments, the ILO, and civil society led to legal recognition of domestic work and legitimized domestic workers' unions, illustrating that C189 can produce tangible policy shifts when supported by strong alliances. In contrast, in Italy and Germany, top-down ratification occurred with little worker engagement, showing that legal reforms alone cannot dismantle structural inequalities. In kafala-governed contexts, where labor inspection is limited and domestic spaces are legally private, policy change must be accompanied by intersectional activism to be effective. Marchetti et al.'s comparative analysis demonstrates that national context shapes outcomes: where domestic workers are included in social justice campaigns (Ecuador, Philippines), C189 leads to inclusive coalitions and sustained implementation; where workers are "othered" (foreign or racialized), C189 remains symbolic. This mirrors GCC states, indicating that meaningful kafala reform requires both legal improvements and social and racial restructuring in domestic labor relations.

The concept of "equality beyond rights" highlights the importance of cultural and discursive change alongside formalized legal rights (Marchetti et al., 2021). Domestic worker movements have used public performances, media campaigns, and language politics to replace deprecatory terms such as "maid" or "servant" with designations like "household workers" or "companions of the home." These initiatives contest moral hierarchies that have long naturalized servitude. Empowerment and capacity-building programs reflect this intersectional approach. Across nine countries—India, the Philippines, and Taiwan in Asia; Colombia, Ecuador, and Brazil in South America; and Spain, Italy, and Germany in Europe—domestic worker organizations have offered training in legal rights, financial literacy, and political engagement, including Brazil's Trabalho Doméstico Cidadão program and the Philippines' UNITED cooperatives. Such initiatives help workers move from marginalization to active engagement with state and employers (Marchetti et al., 2021).

Reforming the kafala system requires a multi-level approach (Marchetti et al., 2021) that addresses both structural and social dimensions. At the sectoral level, labour laws must be integrated to provide formal protections for domestic workers. At the organizational level, worker institutions should be strengthened to ensure that domestic workers have access to collective support and advocacy. At the strategic level, cooperative initiatives between state and civil society are necessary to implement policies effectively and sustain long-term change. Finally, at the interpretative level, public narratives around domestic work must be reframed to challenge entrenched stereotypes and moral hierarchies. While legal reform is essential, it alone is insufficient; meaningful change also depends on social legitimacy and the collective strength of domestic workers themselves.

1.8 Synthesis

The research places migrant domestic work in a configuration of racialised, gendered, and economic vulnerabilities, magnified by the kafala system. Interrelated structural factors such as dependence on sponsorship, intermediaries in migrant recruitment, bureaucratic control, patriarchal ordering, and gendered expectations about care work are shown to facilitate the combined effects of exploitation, immobility, and subordination at work (Pande, 2013; Fernandez, 2021; Fernandez et al., 2023; Mehzer, Nassif, & Wilson, 2021; Chammartin, 2004).

The idea of racialized institutional humiliation from Fernandez (2021) builds on the reform issues identified by Khan and Harroff-Tavel (2011) and illustrates how social invisibility, economic exploitation, and systemic dependency are maintained by legal, bureaucratic, and gendered structures. Gallotti (2015) strengthens this synthesis with robust empirical evidence, showing that domestic work globally — and particularly in the Arab States — constitutes a highly feminized, migrant-dominated, and legally excluded sector. This intersection of gender, migration, and informality crystallizes the logic of kafala as part of a broader transnational labour regime of control and dependency.

Marchetti et al. (2021) also propose that domestic work serves as both a site of inequality and a site of resistance. Their multi-level framework of DomEQUAL shows how sectoral exclusions (labor laws and migration regimes), organizational strategies (e.g., unions, associations, cooperatives), strategic interactions (alliances with NGOs, ILO, trade unions, and sympathetic state actors), and interpretative frames (e.g., frames grounded in feminist, class-conflict, and transnational commodification of care) intersect in different ways by nation-state, producing diverse national consequences. C189 functioned as an external shock that permitted some countries to reposition these arenas toward domestic workers' rights — but only in situations of organizing, political will, and discursive shifts developed alongside legal recognition.

Brazil's historical ties to both unionism and anti-feminist Black organizing show how anti-racism struggles that are also historical can be taken up as the political basis for organizing domestic work; Colombia's UTRASD shows how the settlement between race and politics in post-conflict politics shape domestic workers' identities and activism. In contrast, ratifications in Italy and Germany by governments show how to descent activism to source-level, at a systemic level, and formal adoption, along with social engagement is ineffective if adopted from a top-down level. Together, these experiences signal that dismantling kafala-like structures require, in addition to legislative change, social mobilization, politics of recognition, and enforcement.

Marchetti et al. also emphasize the centrality of cultural politics: naming, public campaigns, and language reforms are not cosmetic but strategic tools that reconfigure social hierarchies and make domestic work legible as labour deserving rights and protections. Practical supports—legal clinics, apps for wage calculation, savings cooperatives, training programs—complement these discursive strategies by reducing isolation and increasing bargaining power.

Chapter 2
The Lebanese Context – Law, Regulations, and Conditions of Migrant Domestic Workers

2.1 Historical and Socioeconomic Context of Migration in Lebanon

Lebanon's migration landscape has evolved through a complex interplay of political upheaval, socioeconomic restructuring, and shifting global labour markets. Historically, Lebanon functioned simultaneously as both a country of emigration and a destination for regional migrants (Bechtold et al., 2022; Shukr & Kazma, 2023). Domestic work in the early twentieth century was performed primarily by local women or women from neighbouring regions, including Kurdish and Palestinian refugees, rural Lebanese women, and some Syrian and Egyptian migrants (Destremau, 2007; Jureidini, 2004). Domestic service was embedded in kinship networks and fosterage practices, reflecting deep-seated patriarchal structures that normalized gendered servitude and undervalued reproductive labour.

The Lebanese civil war (1975-90) had a profound impact on the social fabric of Lebanon. The increased sectarian division between different communities created barriers to movement and decreased the number of available local female domestic employees (Destremau, 2007). Other policies, such as Egypt's ban on sending women to Lebanon for employment in household work and the slow decline in children being taken into foster care, further decreased the domestic workforce in Lebanon.

According to Block et al. (2024), Lebanon's dependence on foreign domestic workers is part of the global trend of relocating workers to affluent areas for domestic services, and it is a significant aspect of globalization in the modern era. The intersections between gender, race, class, citizenship, and colonialism shape the global context of this phenomenon. The civil war in Lebanon increased the number of Lebanese employers seeking to hire migrant labourers, which was exacerbated by socio-economic and racial factors (Jureidini, 2009, as cited in Destremau, 2007; Mansour-Ille & Hendow, 2018, as cited in Destremau, 2007). In recent years, the bulk of this workforce consists of women from Ethiopia, reflecting the conditions and opportunities found in Ethiopia and in Lebanon's recruitment and employment of these individuals.

In the years leading up to the early 2000s, about 160,000 workers from Sri Lanka, 30,000 from the Philippines, and 20,000 from Ethiopia worked as domestic workers in Lebanon among a total

population of approximately 4 million people according to Jureidini (2004) . Only one third of domestic helpers had legal work permits demonstrating a high level of informal work. Employer preferences and recruitment practices demonstrated that racialization was entrenched in recruiting practices in Lebanon. The presence of workers from Asian and African countries changed the status of domestic work for the ones employed in these capacities, further entrenching racial distinctions that linked darker-skinned workers with subservitude and disposability as suggested by Jureidini (2004). Following the war, reconstruction of cities and municipalities was combined with the neoliberal economic model to further benefit this change in the working population. Urban sprawl and expansion, middle-class expansion and increased participation of women in the work force increased the need for migrant domestic workers (MDWs) (Bechtold et al., 2022). Women represent an overwhelming majority of Lebanon's MDWs. MDWs now represent 76% of all people working outside of their home country in Lebanon and 99% of those working in the domestic labour force (MoL, 2019, as cited in Mehzer et al., 2021).

The lack of public welfare systems in Lebanon is a major driver for demand of foreign domestic workers; for example, the state has very little childcare available, no eldercare and very limited disability services. Therefore, as shown by Fakih and Marrouch (2014), foreign domestic workers fill a gap in the caregiving infrastructure in Lebanon, allowing Lebanese women to be employed outside of the home. The employment of domestic workers is not only limited to the wealthy in Lebanon. According to Suen (1993, cited in Fakih & Marrouch, 2014), middle-income households hire migrant domestic workers at a significant rate, indicating that domestic help is treated as a "normal good". Families with young children, the elderly or disabled family members are particularly likely to hire workers and so are families with female heads or heads of household who have a higher level of education. Also, the size of the home and the number of available rooms is important since many of these workers live in the employers' homes.

Lebanon's unique situation in the Middle East is illustrated by the way domestic workers serve as both a source of assistance for the care economy, while simultaneously reinforcing social inequality through multiple forms of oppression based on race, gender, and class. Migrant domestic workers (MDWs) experience compounded forms of marginalization based on pervasive stereotypes, economic disparities, and a lack of adequate institutional protections against abuse (Yimer et al., 2025)

2.2 The Kafala System: Legal, Structural, Gendered, and Racialized Governance

The Kafala system (also known as sponsorship) regulates all aspects of a migrant worker's life in Lebanon including entry, residence, and employment. Originating from Bedouin traditions of guardianship, the Kafala system evolved into one of strict regulations that gives employers a great deal of authority over their workers' legal and economic rights and the ability to limit their mobility or make decisions about their lives (Khan & Harroff Tavel, 2011). Nevertheless, this system is referred to as modern day slavery (ILO, 2020b; Amnesty International, 2019).

Legal Dependency and Exclusion from Labour Protections

Due to the Kafala system, which creates a link between an employee's residency status in Lebanon and the Kafil (the employer), after termination of employment, these employees lose their lawful residency status. As a result, they may be arrested, detained or deported for illegal residency status (Pande, 2013; Puig Ferriol Cabruja, 2021). Furthermore, migrant domestic workers are excluded from the Lebanese Labour Law under Article 7 thus prohibiting them from receiving a minimum wage, standardised hours, rest days, occupational safety or social insurance.

This legal vulnerability systematically creates dependency. Yimer et al. (2025) have identified a "cycle of legal immobility," whereby migrant domestic workers do not report abuses due to the possible immediate loss of residency or retaliation from the employer. Employers can also exert greater control over workers by confiscating their passports, a common practice that is illegal. Instead of providing protection for workers who have left abusive working conditions, these cases of "absconding" are criminalized (Block et al., 2023). Pande (2012) points out that the portrayal of migrant domestic workers by the media and in research is in the victim or severely abused category. Although there is strong evidence in the form of vast documentation by organisations such as Human Rights Watch to support this view, it tends to ignore the potential for independent action or resistance by migrant domestic workers.

Kafala serves as both structural and symbolic violence (Block et al., 2024). Structurally, kafala builds legal and economic dependencies on the employer that constrains workers to poor and exploitable working conditions. Symbolically, kafala positions migrant women in an inferior status within an established hierarchy, reinforcing both gendered and racialized subordination.

Compounded Vulnerabilities

MDWs (Migrant Domestic Workers) have experienced worsening vulnerabilities as a byproduct of ongoing crises such as the financial crisis that began in Lebanon in 2019, followed by the COVID 19 outbreak and the explosion that took place in the Beirut port in 2020. Hyperinflation, unemployment and increased economic insecurity of the population produced increased workloads, unpaid wages and widespread abandonment of MDWs by their employers (Block et al., 2024). Humanitarian observers reported that as rising household tensions developed, women experienced increasing incidence of gender-based violence from male household members (Fernández & Hraizler Carrascal, 2021; Majoub, 2020, 2022; Rak, 2021; Trad, 2022; all cited in Block et al., 2024). After mass exoduses, there were still around 25,000 documented and undocumented migrant domestic workers (MDWs) in Lebanon, according to UN News, 2021, as cited in Block et al., 2024, of which the majority were Ethiopian workers who became the most affected. A significant number of them were left without salaries and without any official papers, and therefore, they depended on embassies or shelters for their safety, as reported by the ILO (2020a) and Yimer et al. (2025). The reasons for which many had to stay in such unstable conditions were economic necessity, absence of legal documentation, and lack of money to buy a ticket to their home country, according to Block et al. (2024).

As a consequence of the war that started in October 2023, and the constant airstrikes all from September 2024 up until now, a large number of migrant workers (especially those recruited as domestic workers) are gradually losing their way of life and living in a very uncomfortable situation (Sensenig, 2025). The escalated unrest after Israel's cross-border attack on Gaza on 8th October 2023 and the subsequent fighting in the region of the Levant has made the plight of the many MDWs more apparent as they suffer the most due to the lack of their rights (Sensenig, 2025). There have been reports of about 4,000 people losing their lives and almost 17,000 being injured because of the ongoing violence according to the ReliefWeb report of November 2024 (cited in Sensenig, 2025), and nearly 1 million residents have been displaced; out of this figure, it is roughly estimated that about 25,000 are migrant workers.

The legal status and dependence on employers via kafala is the main reason for diminished mobility and flexibility of migrant workers. This system restricts the movement of all migrant

workers, but specifically those who provide domestic services (Sensenig, 2025). The war situation in the south border region had an adverse effect on migrant workers, similar to what happened to the general population, as many of these workers were displaced from their homes with their Lebanese employer. However, many migrant workers, particularly MDWs, experienced abandonment by their employers and were left alone to survive in a manner similar to the treatment received by the employers' pet animals and livestock (Sensenig, 2025).

The war engulfed the country as early as September 2024 with an increase in desperation throughout the country (Sensenig, 2025). Evidence of abandonment of migrant domestic workers (MDWs) increased significantly as many women were described as having been abandoned without housing, resources and support (Sensenig, 2025). A large number of women were not given any information in a language they could understand, which prevented them from receiving updates about evacuation procedures and available assistance and hindered their ability to leave the danger areas and evacuate from Lebanon (Sensenig, 2025). There is considerable evidence of racial discrimination toward migrant domestic workers, especially towards people from African countries; many have reported having been denied entry into both formal and informal shelters and safe places during the evacuation (Sensenig, 2025).

There were numerous challenges for hundreds of thousands who had lost access to their travel documents and/or residency permits in proving their identity, thus complicating evacuation efforts and other types of assistance (Sensenig, 2025). These same migrant workers were also limited financially by a lack of pay from their employers and as a result, they could not afford to cover the costs associated with evacuating (Sensenig, 2025). Due to the chaos that accompanies a war, women became victims of gender-based violence, and they could not be protected as workers (Sensenig, 2025).

IOM (as cited in Sensenig, 2025) reported 881,326 internally displaced persons at the peak of the bombing conflict, including around 23,850 migrant workers who had to abandon both their residences and employment. IOM estimated that between 6,000 and 10,000 migrant employees would require return assistance, which was supported by inquiries from both the migrant's embassy and homeland government, and also from the migrants directly (as cited in Sensenig, 2025).

Gendered and Racialized Hierarchies Within Kafala

The kafala has established a formal framework that dictates the ways in which women are controlled based on both race and gender. The majority of MDWs are women, and many of the restrictions they experience limit pregnancy, monitor their ability to travel, prohibit their ability to maintain intimate relationships, and force them to live at their employers' homes; these restrictions increase the possibility that female MDWs will be subject to both physical and sexual violence (Bechtold et al., 2022; Fernandez et al., 2023). Once they become pregnant, most female MDWs will be terminated and deported immediately; this is by design, as employers want power to dictate from when to become pregnant to when to give birth. Racialization is a key component of this system. According to Yimer et al (2025), Ethiopian women are racially and culturally stereotyped as "unclean" or morally suspect according to an orientalist perspective; the result of this is a cultural and societal bias that plays a critical role in how police officers and judges perceive MDWs. Police officers and judges often dismiss the testimony of a MDW, make the assumption that they are guilty, or attribute the violence to the supposed "cultural characteristics" of the MDW. Therefore, both cultural norms and institutional policies and procedures reinforce and promote the inequities that female MDWs face.

Mental Health Consequences of Structural Violence

The kafala system creates both structural and symbolic violence which causes significant psychological harm to the migrant domestic worker population. Zahreddine et al. (2014) conducted one of the first systematic psychiatric evaluations of foreign domestic workers who were hospitalized in Lebanon. Their research shows significant rates of psychiatric morbidity that are directly related to their working environment of exploitation. Of the 33 foreign domestic workers studied and compared to 14 Lebanese females, they found that there are very high levels of sexual (12.5%), physical (37.5%), and verbal (50%) abuse reported and two-thirds of the foreign domestic workers were diagnosed with brief psychotic episodes.

The researchers contextualize these clinical patterns in a broader body of research on migration and mental health and emphasize how the power imbalance, long hours, confinement to a place of employment, and limited means of communicating with family and friends create the same types

of conditions as the mechanisms that create chronic stress and a socially oppressed state for other vulnerable populations. The findings of the research show how the restrictive kafala system is expressed through the living situations and eventually mental well-being of the workers. More than half of those interviewed lived in a location that had no lease or independent bedroom. Some even had to sleep in a bathroom or a part of the kitchen. More than 30% of the participants (as indicated by their weight) would be classified as undernourished. Chronic stress, as well as the cumulative effects of deprivation, may have caused this undernourishment.From a psychiatric point of view, FDWs were much more prone to receiving a diagnosis of psychotic disorders as opposed to affective ones when compared with the Lebanese controls. They also had higher incidences of being brought in under the law against their will and shorter durations of hospitalization, which were usually followed by deportation at once. According to the authors, the latter is a scheme that results from the employers' reluctance to costs of the continuation and the institutional demand for quick stabilization.

The study shows that nearly 70% of the psychiatric crises experienced by the participants were associated with stressors experienced after their migration to Lebanon, indicating that most of these workers did not experience their psychiatric breakdown until they had been in Lebanon for over two years (26 months). This may indicate a cumulative breaking point for the workers instead of an immediate response to adjustment difficulties. Furthermore, this finding demonstrates that living with the structural violence conceptualized by kafala over time ultimately leads to psychological damage. The impact of kafala on the psychological state of the FDW population cannot be examined through the lens of individual pathology; rather, the pattern of psychiatric morbidity of FDWs highlighted in this study demonstrates the way that structural violence associated with migration and labour laws has connected to overall mental and physical health outcomes for the population of FDWs in Lebanon (Zahreddine et al., 2014).

2.3 Recruitment, Bureaucracy, and Institutional Mechanisms of Control

Bureaucratic structures interact with recruitment processes to create and establish the vulnerabilities of MDWs. Recruitment agencies in both Lebanon and countries sending MWD ask for high recruitment agency fees and provide misleading recruitment information to workers and employers and provide/or create fraudulent employment contracts for placement of workers

(Ghaddar et al., 2020; Puig Ferriol Cabruja, 2021). As a result, many women go into debt before leaving and/or find themselves heavily in debt when they reach Lebanon. Therefore, many may not report abuse or leave an abusive situation due to the debt they feel obligated to pay back to their employer (ILO, 2015b; IOM, 2021).
These vulnerabilities before migration are interconnected with the institutional restrictions after migration. Block et al. (2023) state that residency permits, work authorizations, and documentation renewal are only dependent on employer cooperation. If there are no signatures from the employer, a worker is considered undocumented, hence, he is more criminalized and cannot access services.

Yimer et al. (2025) provide documentation that traces the way that bureaucratic dependencies also lie at the foundation of the legal system in Lebanon. Of the 49 imprisoned Ethiopian women who participated in the study, only two had access to translation services and just over half of them were appointed an attorney. This stands in stark contrast to the requirement of Article 47 of the Criminal Procedure Code which requires police to notify a detainee of their rights. The predominant methods of coercion and intimidation (including forced confessions) have been exacerbated by language barriers and the racialized assumptions of guilt. The opacity of our institutions increases our vulnerability. Many workers have been deported by the General Security, even though their legal processes are still ongoing. This is a violation of their right to due process, and effectively erases their opportunity for justice. Therefore, the legal system has become an extension of the kafala system's methods of discipline rather than an avenue for safety.

2.4 Social, Cultural, and Intersectional Dimensions of Vulnerability

The way in which MDW's experience daily life is determined not only by the formal laws, but also by the norms within society, employer practices, and the intersectional structures of domination. By being live-in workers, their mobility is restricted and the separation of work/life is lost (ILO, 2016a). Employers develop their own moral codes that dictate the dress, speech, and/or sexuality of their employees (Bechtold et al 2022; Block et al 2023), it is these moral codes that disproportionately affect women due to the patriarchal notion that domestic services require discipline/surveillance of employees.

The control of women's reproductive rights plays a key role in this system, with many employers

requiring their employees to take pregnancy tests, firing pregnant employees, or taking away their access to contraceptives (ILO 2009, 2014b). The idea that an employee's socialising with other individuals outside the home is considered 'immoral' puts employees at risk of being arrested. Racial and gender biases permeate throughout all levels of the justice and security systems and are evident through the experiences of workers such as verbal abuse while incarcerated, as documented in the works of Yimer et al (2025).

The concept of intersectionality can be used to help understand these dynamics, as the way that MDWs experience race, gendered labour expectations, and legal exclusion all intersect at the same time; therefore, the individuals' vulnerability cannot be described in only one aspect as outlined in Crenshaw's theory, rather, their marginalization consists of several different layers, which reinforce each other. Yimer et al. (2025) explain that the structural exclusion of MDWs from accessing justice does not occur by chance, instead, it is the product of a migration regime that emphasizes employer dominance, administrative convenience, and a race-based social hierarchy.

Transnational Motherhood and Immobilization of Children

The kafala system's negative effects on workers extend to their children born in Lebanon. Researchers have traditionally studied children of migrant workers who were left behind in sending countries and the emotional challenges of parenting across borders (Alcázar, 2023; Borromeo, 2010, 2021, as cited in Block et al., 2024), yet relatively little research has been done on children born to MDWs within receiving countries and how these children experience such extreme vulnerabilities (Fernandez et al., 2023; Block et al., 2024). More recent research has begun addressing some of these issues by exploring the challenges that children of MDWs in Lebanon encounter, including: lack of citizenship or nationality; high-risk situations (especially during childbirth); access to the legal system; inability to acquire documentation; a precarious legal status; exclusion from basic resources; and other negative consequences resulting from the lack of access to statutory protections (Fernandez et al., 2023; Yasmine & Sukkar, 2019; Mahbubv et al., 2024; Pande, 2014, as cited in Block et al., 2024).

Block et al. (2024) identify the kafala system within Lebanon as one of "immobilization," signifying that migrant mothers and their children are functionally immobilized by this system;

this immobilization includes emotional, moral, and legal supports, which cause an immobilization that is beyond the expected outcome of a residency being located in a country through incarceration. These ethnographic studies demonstrate that the migrant mother can derive emotional support not only through her familial associations but also through various cultural representations, e.g., clothing. The studies further identify many different components and multiple layers of violence—structural, symbolic, and interpersonal—which contribute to the immobilization of the family structure associated with migrant mothers (Constable, 2014; as cited in Block et al., 2024). In conclusion, Block et al. (2024) demonstrate how, similarly to being incarcerated, the kafala system along with various policies concerning citizenship will result in the immobilization of the families of migrant mothers, thereby limiting opportunities for growth and development of all members of these families.

Legal Barriers to Birth Registration and Citizenship

Children of MDWs suffer extreme lack of legal and social recognition in Lebanon. The Lebanese Nationality Law of 1925 is based on paternal jus sanguinis, which allows citizenship only through the father. As such, the law discriminates against women by prohibiting them from passing on their nationality to their children or to their foreign spouse (Fernandez et al., 2023; Yasmine & Sukkar, 2019; Block et al., 2024). Because the fathers of the children born to MDWs are frequently either unknown, undocumented, or foreigners without legally-recognized parentage, many of these children will ultimately find themselves in an increasingly vulnerable position of either being born stateless or being at risk of becoming stateless (Fernandez et al., 2023; Block et al., 2024).

Lebanon's convoluted and bureaucratically challenging process for registering the births of migrant domestic workers represents 'almost an impossible hurdle to overcome' (Fernandez et al., 2023). The registration requires proof of a legal residency through valid residency permits; notification from the hospital of the birth; proof of marriage, and more, none of which can be realistically obtained by an individual employee on the Kafala system. As a result of the Kafala system tying legal residency status to the employer who sponsors the worker's residency, workers who either leave the sponsorship of their employer, including those who leave to flee their employer upon becoming pregnant, lose their legal refugee status and are subject to potential detention or deportation (Fernandez et al., 2023). As such, most children born of MDWs whose

residency is legally overdue, will not have birth registration documents (Manara Network, 2011, in Fernandez et al., 2023).

Mothers with precarious legal status will experience extreme difficulty navigating the bureaucratic procedures to obtain the documents necessary for their children to be legally registered at birth, access medical care, enroll in school, or gain any other type of legal recognition that is dependent upon the submission of those documents, which necessitate the cooperation of their employers (Block et al., 2024; Fernandez et al., 2023).

Reproductive Control and the Criminalization of Motherhood

Block et al. (2024) highlight how these children's immobilization is not accidental but rather the structural outcome of combined oppression and regulation of women's bodies created through the intersection of kafala's gendered oppression and Lebanon's citizenship regime. The kafala system extends control beyond labor to the intimate domain of reproduction. Employment contracts explicitly prohibit pregnancy, and MDWs are subject to mandatory pregnancy testing and can be repatriated if found pregnant (ILO, 2012, as cited in Fernandez et al., 2023; Yasmine & Sukkar, 2019).

Yasmine and Sukkar (2019) argue that migrant women are viewed essentially as workers who should have no personal interests beyond their labor. Constraints on MDWs' mobility and freedom aim to curtail familial or intimate relations and unequivocally restrict access to contraception, abortion, antenatal care, emergency obstetric care, and delivery services (Frantz, 2008, as cited by Yasmine & Sukkar, 2019). The state's perception of migrant women's sexual, intimate, or familial relations as threats was further evidenced when a 2015 memo from the General Directorate of General Security to the Ministry of Justice proposed that sponsors pledge to forbid employees from sexual activity, with violations resulting in arrest and deportation (Azhari, 2015, as cited by Yasmine & Sukkar, 2019). Human Rights Watch reports from 2014 and 2016 document that MDWs who have had children in Lebanon have been detained, deported, and denied residency permit renewals (Human Rights Watch, 2016, as cited by Yasmine & Sukkar, 2019).

Women who are prohibited from having intimate relationships or pregnancies face immediate termination from their kafala position upon discovery of pregnancy (Block et al., 2024; Fernandez

et al., 2023; Yasmine & Sukkar, 2019). Pregnant workers confront impossible choices: (1) terminate the pregnancy; (2) keep the pregnancy secret and deliver the child in secret, usually without medical assistance; or (3) escape their employer and become undocumented, rendering both mother and child criminals under Lebanese law (Block et al., 2024; Fernandez et al., 2023).

Approximately 15,000 children of MDWs live in Lebanon, and forbidden pregnancies—whether resulting from rape or otherwise—force many MDWs to leave their employment, breaching contracts and creating extreme precarity for both mother and child (Frantz, 2008, as cited by Yasmine & Sukkar, 2019). The 2018 case of Lembibo, an Ethiopian domestic worker whose pregnancy was discovered one month before delivery, whose daughter died two hours after birth, and whose own body was subsequently found dead in her employers' pool, exemplifies the deadly consequences of this system (Fakhoury, 2018, as cited by Yasmine & Sukkar, 2019). No proper medical explanation has been provided for either death. Lembibo had faced physical and verbal violence at work, and her employers expressed bewilderment that she would not immediately return to work after her newborn's death (Fakhoury, 2018, as cited by Yasmine & Sukkar, 2019).

Patriarchal and Racialized Dimensions of Control

Yasmine and Sukkar (2019) situate the vulnerability of MDWs' children within Lebanon's broader politics of reproduction and citizenship control, characterized by what they term "demographic fear"—an anxiety about sectarian balance that drives discriminatory citizenship policies. While demographic fears surrounding refugee populations center on sectarian balance, the characterization of migrant domestic mothers as deviant centers on their racialized identities as Black, Brown, or East/South-East Asian women from low-income countries. The dehumanization of migrant domestic workers occurs as a result of perceiving fundamental cultural, intellectual and social differences as legitimising its harsh working conditions created by the Kafala system. This belief has been reinforced through cultural norms in Lebanon, which consider migrant workers simply as a source of labour (Yasmine & Sukkar, 2019).
In addition, Fernandez et al. (2023) note that marriage laws and policies in Lebanon depict MDWs only as workers who cannot integrate socially or create family structures in Lebanon. Socially constructed stereotypes of MDWs exist within the broader context of society's views of MDWs as "working in Lebanon that does not enable them to have social lives, partners, marry or raise

families" (Interviewee 6, as cited in Fernandez et al., 2023). These viewed stereotypes reinforce negative legal frameworks which have been established by the state to exercise power over MDWs. For example, Public Notice No. 1778 (Ministry of Justice, 2014, as cited in Fernandez et al., 2023) states employers are required to ensure MDWs do not marry or have relationships, extending the control of the employer into the private sphere of the MDWs private space and intimacy.

Legal Limbo and Intergenerational Vulnerability

Those who decide to keep their children face prolonged "legal limbo." In the absence of support from the employer—which is hardly ever the case because of the stigma and the fact that pregnancy is a contractual violation—mothers are unable to obtain the papers needed for the registration of their children's birth (Block et al., 2024; Fernandez et al., 2023). Hence, children become "illegal" in the eyes of the law and are deprived of access to schools, healthcare, and identity documents. This legal eradication places children in the same disadvantaged condition as their mothers, thus perpetuating the cycle of vulnerability from one generation to another (Block et al., 2024; Fernandez et al., 2023).

Financial costs associated with hospital births, legal documentation, and translation services further restrict MDWs' ability to comply with bureaucratic requirements. Before the Syrian crisis, hospitals occasionally issued birth notifications free of charge to women unable to pay; however, this practice has largely disappeared, with hospitals now requiring full payment before releasing documents (Interviewee 6, as cited in Fernandez et al., 2023).

Compounding Crises and Adaptive Strategies

The crises that began in 2019 worsened these vulnerabilities. According to Block et al. (2024), mothers and their children were already suffering from poor socio-economic conditions when hyperinflation began eroding wages, leading to widespread abandonment by employers. Shelters and embassies became overwhelmed, and many mothers and children became homeless, living in overcrowded and unsafe places.

Despite the restrictive possibilities surrounding Migrant Domestic Workers and the MDW children that they give birth to in Lebanon, the work of Fernandez et al. (2023) highlights the many ways

in which Mothers adapt to the conditions of their captivity. Many MDW mothers choose to omit the father's name from the birth certificate. Fernandez et al. referred to this action as a strategic disappearance of the father as a way of removing many bureaucratic barriers to allowing their child to leave Lebanon. Mothers use organisations such as NGOs (e.g. Egna Legna and MSF) and/or religious organisations to access medical care, complete their birth registration, and to help them complete the paperwork necessary for repatriation to their home country (Fernandez et al., 2023). The flexibility of certain Embassies (e.g., Philippines, Bangladesh) in their effort to combat the Kafala System's impact on women has also provided women in these countries with options to overcome some of the obstacles imposed by this structure. That is, for example, the Philippines and Bangladesh Embassies offer the processing of the birth registration for a newborn, even if the mother may not have been able to produce all paperwork needed for completion of the registration. For these Embassies, the priority is to protect the human rights of mothers, rather than simply follow a strict protocol when handling MDW cases (Fernandez et al., 2023).

Structural and Symbolic Violence

Block et al. (2024) provide an analysis that conceptualises the Kafala System as creating a dual layer of violence—structural and symbolic—in relation to MDWs and their children. The children born to MDWs inherit both legal precariousness and social marginalisation from their Mothers (Block et al., 2024; Fernandez et al., 2023)

According to Yasmine & Sukkar (2019), the apparatuses of state reproductive oppression in Lebanon extend well beyond those of the kafala system to include those of the state through various security, legal, prison, and media apparatuses. Through these various apparatuses, the Lebanese state has informed migrant women that their reproductive capacities are not completely at their own disposal. The moral values associated with what is perceived to be good motherhood are used to establish a "quality" population, by eliminating the "undesirable" motherhoods of migrant women's who are employed as domestic workers (Yasmine & Sukkar, 2019). The state employs legal, economic, medical, and social penalties to oppress the reproductive rights of women (Yasmine & Sukkar, 2019).

Migrant women who are part of the kafala system thus become confined within a biopolitical

system of control that is designed specifically to control the labour, bodies, and reproductive capacities of migrant women for the benefit of the state and employers (Fernandez et al., 2023). Migrant women in the kafala system face systematic denial of reproductive autonomy, criminalization of motherhood, and creation of stateless children. The kafala system represents an ongoing, multi-generational form of gender and racial oppression (Block et al. 2024; Fernandez et al. 2023; Yasmine & Sukkar 2019)

Engendering Migrant Counterpublics: Contesting Public-Private Boundaries

The stories of Ethiopian migrant domestic workers in Lebanon tell us that although they experience a double exclusion as women and migrants, they are in fact negotiating the way they interact both within their public and private world in complexity. In her article, Fernandez (2024) demonstrates how Ethiopian MDWs create new definitions of what constitutes a "public" and "private" space. Historically, feminist critiques of the way social constructions create boundaries around the public and private continue to show that these boundaries are created by patriarchal powers to keep women from achieving empowerment. Feminist scholars have produced a large body of literature on the Public/Private debate, demonstrating that the way we define the differences between public and private is always affected by existing inequalities based upon economic, political and cultural power relations between women and men, which continues to lead to divergent interpretations of the two concepts (Lister, 2003; as cited in Fernandez, 2024). Feminist critiques of this form of dichotomization have been produced in the course of a project to reframe dichotomies and destabilize them, in order to reveal how the private domain is often a vehicle for perpetuating gender-based hierarchies while simultaneously providing an area of the potential for resistance.

In Lebanon, Ethiopian MDWs experience a unique form of double exclusion, as noted by Fernandez (2024). Due to racialized gender bias, their access to public spaces is limited, while their participation in household labor under the "private" domain means they do not receive any labour protection or citizenship benefits, mirroring the historical exclusionary practices of the formal labour market for women(Mansour-Ille & Hendow, 2018; cited in Fernandez, 2024). Despite these structural limitations, Ethiopian MDWs often create non-formalised "private" spaces in both public and private environments; the most common, being parks, churches, shopping malls

and eateries, serve as places for rest, connection, as well as collective organisation (Fernandez, 2024; Pande, 2012; Veah & Yeoh, 1996; cited in Fernandez, 2024).

These practices are viewed as part of a larger process of reconfiguring the boundaries of public/private among migrant women as explained by Fernandez (2024) using Fraser's (1990) concept of subaltern counterpublics. Subaltern counterpublics are alternative discursive arenas where marginalised groups generate and disseminate discourses that contest the identified dominant framing of their identity, interests and needs. Fernandez facilitates an understanding of the way in which Ethiopian MDWs establish areas for resistance and solidarity utilizing the same concept that has been widely applied to contexts including how migrants utilise public space (Warner, 2002) and the emergence of digital spaces as organizing platforms for racialised youth(Mikola & Mansour, 2015), social movements (Asen, 2016, Ramos, 2019 & Fernández, 2021; Nagar 2014) and gender based organizing within public/private spaces (Grainer, 2021, Mpofu et al., 2022, Xing, 2012) all cited in Fernandez (2024).

Fernandez (2024) points out that although subaltern counterpublics have been extensively studied by academics, there have been few studies specifically investigating the experiences of women in both the public and private spheres, particularly with regard to migrant domestic workers (e.g. Calhoun, 2003, Celikates, 2015, Calhil, 2018, Ehrkanp, 2013, Yeoh & Huang, 1998; cited in Fernandez, 2024). Therefore, this represents a critical research gap since understanding how migrant domestic workers navigate both of these spheres provides insight into the multiple ways that counterpublics are formed within and against the spatial logics of kafala.

According to Fernandez (2024), Ethiopian migrant domestic workers (MDWs) develop relationships within the community by creating ways for all of them to support one another, sustain friendships, and provide care for each other. It is her argument that these collective practices allow them to challenge the traditional gender role they have in society and contend with being labelled "invisible" due to their gender and race. She indicates that in order to comprehend the manner in which migrant workers resist the oppressive nature of a carceral-type migration system, we must give attention to these counterpublics (i.e., groups formed by individuals to create an alternative economic, social and political organisation). While establishing and maintaining strong counterpublics, these workers are still able to establish ways in which to create a visible public

perception of domestic work. This enables these workers to re-establish their political identity through the collective action they take.

This study builds on and deepens the analysis of Pande's (2012) concept of 'meso-level resistance' by theorizing how the different forms of resistance described here create new ways for Ethiopian Migrant Domestic Workers to be seen as political subjects in the alternative public sphere. In addition to helping create an environment for having some fun, helping each other and spreading solidarity among colleagues through how they organise, these forms of resistance represent a direct challenge to one of the key underlying assumptions behind the kafala system – that domestic workers belong exclusively to the private sphere and should never participate in society or politics at all.

Meso-Level Resistance and the Contestation of Space

The idea of 'migrant counterpublics' is a useful frame for understanding the ways in which the 'meso-level resistance' referred to by Pande represents a form of collective resistance that occupies the middle ground between individual responses to the system's oppression and formally organised labour movements. The 'meso-level resistance' described here provides the means through which the exclusionary nature of the kafala system was able to create both 'confinement' and 'marginality' within the spaces where Ethiopian MDWs had to live and work, and to convert those spaces into places of unexpected solidarity and political engagement.

According to Pande (2012), three main types of collective resistance exist that serve to oppose the individualizing nature of the kafala system.

First type of collective resistance falls under the title of "**balcony talk**," which is comprised of informal neighbourhood networks for migrant domestic workers (MDWs) who are kept in different households (apartments) separated from each other physically by barriers and also subjected to constant employer surveillance. Balcony talk networks help create a two-way communication system between MDWs on their balconies, allowing to exchange information about bad employers; to come together to offer each other support, and to maintain friendship connections with one another through their balcony talk; and as such, these networks represent the

informal social support network of MDWs without the benefit of formal social protections and the ability to gather publicly.

Second, **church-based collectives** emerge on Sundays. MDWs develop community-based networks on Sundays when workers are allowed time to leave the house and not feel constrained. The church and abandoned buildings provide a place for MDWs to organize and exchange ideas about how to survive and create community. During these gatherings, referred to by Pande as "practical prayers", MDWs are given an opportunity to support one another emotionally and to develop strategies for organizing collectively. MDWs can utilize these networks to access resources, establish trusted employers or safe havens, and build a collective sense of awareness regarding their circumstances. In the end, these networks help workers escape exploitative work conditions by using information to create a collective identity. The church gatherings, as well as informal gatherings at parks, shopping centers, and coffee shops, function as counterpublics for migrant domestic workers. According to Fernandez (2024), these gatherings allow migrant domestic workers to connect with one another, share their experiences, establish friendships, and support each other collectively as a way to demonstrate their sense of belonging and humanity in a historically oppressive environment that denied both of those factors.

Finally, the **illegal apartment collectives** operate as a more formal vehicle for organizing resistance among workers who have fled duress from their employers. Worker collectives offer various benefits to each other by providing a community for informal support; they allow workers to share information about pay scales, working conditions, employment laws and support for one another with respect to going to court. By forming their own living environments, workers challenge the requirement of living with an employer by isolating them and creating a situation where they are exposed to further victimization.

Alliances, as noted by Pande (2012) consist of more than just options for coping with various challenges; they also provide other avenues of support. Pande was able to illustrate this using Scott's (1999) concept of "weapons of the weak" and how they act as meso-level forms of resistance to provide powerful resistance to spatial exclusion in the kafala system in Lebanon. By taking back and repurposing locations such as balconies, churches, and derelict buildings into

symbols of resistance and unity, domestic migrant workers are creating an avenue to assert agency within a structure that is primarily focused on atomization and control.

According to Fernandez (2024), spatial practices are the foundation of subaltern counterpublics. These counterpublics are not only a vehicle for survival, but also a new forum for conversation about ethnic and social identity through discourse. Counter-narratives allow Ethiopian MDWs to challenge stereotypes based on the labor they perform and assert their political and social rights and needs. Domestic work has previously been understood as private and dominated by gendered expectations, and counterpublics will help create a new public-facing understanding of this type of labor as a form of oppression and exploitation.

Pande (2012) and Fernandez (2024) both push back against the usual focus on victimhood in studies and advocacy about MDWs in Lebanon. Certainly, groups like Human Rights Watch have played a huge role by exposing extreme abuse publishing reports that are crucial for legal reforms and public awareness. However, when everything is centered on vulnerability and suffering, it starts to drown out another story. Pande (2012) points out that this approach can conceal the real agency MDWs show every day, the ways they organize and fight back together. The vulnerability narrative, even though based on real evidence, ends up missing the complex strategies and forms of resistance these workers develop, both individually and as a community.

While this analysis does not belittle the intensity or extent of the exploitation faced by MDW's, it instead emphasizes the possibility of collective action among MDW's, despite extreme structural constraints. For Ethiopian MDW's specifically, together through the use of meso-level strategies and counterpublic formations, they are able to achieve not only a means of survival but also maintain a sense of dignity and personhood, as well as assert political subjectivity, in systems that want to treat them as nullified and disposable workers. The development of excluded and further marginalized areas as hubs of support and counterpublic discourse also demonstrates that being spatially confined does not limit a worker's ability to organize, mobilize politically, or resist their situation; rather, these workers establish new spaces of resistance and create alternative public spheres within the very same structures that were designed to exclude or silence them.

2.5 Reform Prospects, Structural Obstacles, and the Path Forward

The reforms undertaken have been piecemeal and largely symbolic. Their attempts to unify contracts or regulate agencies fail to address the root power imbalances created by the kafala (Khan & Harroff Tavel, 2011). Although integrating domestic workers under the Labour Law, creating an independent complaint procedure and guaranteeing access to legal representation and translation are all essential, these actions are nevertheless inadequate without the dismantlement of the foundational principles of kafala (Mehzer et al., 2021).

According to Yimer et al., "Lebanon's biggest challenge is enforcing Article 47 and many rights protected under this article are repeatedly neglected." The conditions in which migrant domestic workers (MDWs) are kept within Lebanon continue to be unregulated, and MDWs are subjected to coercion by their employers, forced into false confessions, detainment and deportation without any guidelines. As a result, the embassies of countries with significant numbers of MDWs, including Ethiopia, may not have the resources to provide assistance to MDWs that need it most. Additionally, Block et al. noted that since 2019, both social and political crises, have resulted in further displacement of those MDWs who had access to some limited protection and assistance from state institutions; thus state institutions are now prioritizing the needs of Lebanese citizens above their own and humanitarian assistance for refugees rather than MDWs.

The Role of Informal and Formal Collective Action

The recognition and support of both informal collective organizing utilized by MDWs and the formal civil society institutions that provide support through Institution are necessary for Reform. The findings of Pande (2012) and Fernandez (2024) show that workers have developed sophisticated methods of resistance, such as balcony communication networks, church-based collectives, illegal apartment cooperations, and the establishment of counterpublic facilities in parks, malls, and restaurants, all of which create barriers against Kafala's spatial exclusion and challenge gendered dichotomies that have rendered their labour invisible. These informal affiliations and counterpublic formations demonstrate that MDWs are not merely passive victims waiting for external help; they are active participants in generating solidarity, distributing counter-narratives, and declaring their political subjectivity despite being under strict constraints.

When we support grassroots organization, like workers organizing themselves (rather than just trying to make legal changes through top-down reforms and providing charity), this supports the political capacity of workers to be able to create and maintain a path to sustained worker-led change. Sustained change will still require ongoing accountability from institutions (and ratifying the ILO Convention No. 189). This ratification will provide a minimum level of labor rights and recognise that domestic work is work; therefore, making it eligible for the legal protections it requires.

Furthermore, specific legal changes need to be made to help improve the lives of children born to MDWs so that they do not continue to be discriminated against: grant citizenship/permanent residency to all children born within Lebanon regardless of the legal status of their parents, create an accessible means for parents to register the birth of their child without requiring the involvement of the employer, and ensure equal access to education, health care and social services provided to the children no matter what the mother's legal status. This will promote the health and welfare of the children, as well as breaking the cycle of social marginalization and/or legal precarity for generations to come.

2.6 Synthesis and Implications for the Lebanese Context

Lebanon's domestic work system consists of socially entrenched hierarchical structures based on gender, race, class and nationality. The labour migration framework exemplifies the concept of structural violence, such as that set out by Galtung (1969) cited in Yimer et al.(2025), whereby inequality is embedded in state laws and bureaucracy. According to Yimer et al.(2025), these same structural dynamics also impact the justice system itself, so that it too, often reproduces rather than remedies harm. Block et al.(2024) show how structural violence can be intergenerational, therefore immobilising not only migrant mother but also their children because of common patterns of legal exclusion and social stigma.

According to Crenshaw (1991) and referenced by Yimer et al. (2025), intersectionality explains why the increasing vulnerability female migrant domestic workers (FMDWs) is due to the circumstances of their lives being at the crossroad of gender oppression through servitude (MDW status), racial discrimination and poor treatment (MDWs being identified racially), and lack of legal support against employment abuse (e.g., missing immigration paperwork). Children born to

MDWs additionally suffer from this intersectional disadvantage by being either stateless or in danger of becoming stateless and therefore lacking both legal rights and social acceptance from birth.

According to Pande (2012) and Fernandez (2024), despite having systems in place intended to limit employer power over workers through fragmentation of workforces into isolated groups, MDWs create multiple forms of resistance against these systems. Through this resistance at the meso-level through the creation of alternative public spheres, MDWs are able to engage in collective action, share alternative discourses, and mobilize politically within severe structural constraints. Overall, Fernandez's (2024) development of the term migrant counterpublic clearly articulates that Ethiopian MDWs are more than just resisting their exploitation; they are creating alternative public spaces in which they assert their political subjectivity, challenge gendered and racialised constructions, and raise domestic work as an issue to be concerned about publicly rather than being thought of just as part of the 'private' domain.

Meaningful progress can be made by implementing a systemwide transformation. This means working at multiple levels. First, it means dismantling kafala, extending labour protections to domestic workers, providing access to translation and counsel, establishing accessible complaint mechanisms, reforming citizenship laws to allow children born to migrant mothers protection under these laws, and recognising the rights of migrant domestic workers and their children as rights-bearing individuals. Second, reform must be based on supporting and amplifying workers' own organising efforts and counterpublic formations, instead of treating workers as passive recipients of outside advocacy. This support will include creating legal protections for workers' rights to organise, access public space, and engage in collective action without fear of criminal conviction or deportation. All these actions are consistent with the objectives set forth in SDG 5 (Gender Equality), SDG 8 (Decent Work) and SDG 10 (Reduced Inequalities) as well as the larger global goals established for the governing of migration fairly and preventing statelessness.

Lebanon's current political and economic crises have left an already inadequate array of institutions that are demonstrably incapable of meeting the needs of all of the people within Lebanon; however, an opportunity exists for positive change through the strength and advocacy of migrant workers in Lebanon. As shown by various sources, including Pande (2012), Fernandez (2024), Block et al.

(2024) and Ramon Icart (2021), any successful pathway forward must capitalise on the resistance demonstrated by workers, the development of counterpublics within the framework of workers, along with the support of institutions that protect rather than persecute migrant workers' right to be treated with dignity, the right to seek justice, the right to political voice and the right to create a sense of belonging for themselves and their families in Lebanon.

Chapter 3
Methodology

3.1 Introduction

This study adopts a qualitative research design to consider migrant domestic workers' lived experiences (MDWs) in Lebanon operating under the kafala system. The research considers women's experiences of domestic work in Lebanon, specifically those who have worked as domestic workers previously and still reside in Lebanon, allowing reflection on their past experiences while bringing forward their current thoughts regarding the social, emotional and structural influences of that process. The study is framed around the following research questions:

1. How do migrant domestic workers engage in employment under the kafala system in Lebanon?
2. What strategies do they employ to cope with, navigate, or resist the constraints of the kafala system?
3. How do the lived experiences of MDWs influence their understanding of mobility, agency, and labour relations?

These questions are best addressed through qualitative approaches as they facilitate deep investigation into individual stories, their meanings, and social interactions without attempting to achieve numerical representation. Thus, the use of qualitative methods is a way to provide depth as well as contextualized understanding. Moreover, by engaging participants as active agents in a cooperative knowledge process, it creates depth because it allows narrators to show interest and uncertainty in the knowledge they share.

3.2 Research Design

The study employs an exploratory, interpretive design rooted in feminist, reflexive, and postmodern epistemologies. The exploratory design is due to the fact that the research seeks to reveal and interpret complex experiences of working under the kafala regime, a socio-legal system which is often under-theorized and power-asymmetry-influenced. The design's interpretive character places knowledge in participants' frames of reference, recognizing social reality is

constructed through interaction between human beings and the meanings they attribute to their experiences (Yanow & Schwartz-Shea, 2006, as cited in Edwards & Holland, 2013). Feminist and critical research design approaches also shape the study in their emphasis on the political and ethical construction of knowledge, in their concern for the impact of power, gender, and place on the interviewing process and the knowledge that results (Jordan et al., 1994; Oakley, 1981; Doucet & Mauthner, 2008, as cited in Edwards & Holland, 2013). In acknowledgment of the dyadic construction process between participant and researcher, the research adopts a co-constructed approach to knowledge production, as is the current qualitative interviewing **(**Mason, 2002; Denzin & Lincoln, 2011, as cited in Edwards & Holland, 2013).

This model is especially fitting to explore MDWs where their stories will include sensitive materials, varying levels of social hierarchies and past work experience. The design allows for flexibility, responsiveness and reflexivity in data collection and analysis with participants' voices steering the research while allowing the researcher the independence to follow emergent themes and social processes.

3.3 Sample/Participants

The study included ten female migrant domestic workers who had worked under the Lebanese kafala system and who were in Lebanon when the research was taking place. These participants were recruited through Insaaf Lebanon, which helped in creating trust and ensured the interviews were conducted in a safe environment. A purposeful sampling approach was applied, whereby individuals were identified and selected on the basis they had first-hand experience of the kafala system, thereby allowing an investigation of lived realities, coping mechanisms, and perceptions related to mobility and agency. Table 3.1 presents a summary of participants' socio-demographic characteristics.

Table 3.1 Socio-Demographic Characteristics of Participants

Characteristic	N
Age (years)	
– 18–25	**0**
– 26–35	**2**
– 36–45	**4**
– 46–55	**2**
–56+	**2**
Nationality	
Kenyan	**2**
Nigerian	**3**
Madagascar	**1**
Sierra Leonean	**1**
Philippines	**2**
Sri Lankan	**1**
Marital Status	
– Single	**5**
– Married	**3**
– Divorced/Widowed	**2**
Education	
– Primary	**0**
– Secondary	**6**
– Tertiary	**4**
Employment history	
– 1–3 years	**1**
– 4–6 years	**2**
– 7+ years	**7**

Note: n = number of participants; % = percentage of total participants.

3.4 Data Collection Methods

3.4.1 Semi-Structured Interviews

Data was collected using **semi-structured interviews** which have been chosen due to the combination of thematic guidance and flexibility that they provide. Semi-structured interviews allow participants to describe their past employment record in their own words, yet are flexible enough to enable the researcher to pursue supplementary questioning for deeper analysis of issues such as working conditions, exploitation of labor, social relations with employers, coping strategies, and experiences of mobility restrictions
Each interview lasted approximately an hour. The interviewees were asked to discuss their lives within the kafala system with a particular focus on working conditions and their personal experiences throughout the duration of their stay in Lebanon. The interviewees were no longer employed as domestic workers in Lebanon at the time of the research, but their recollections of living in Lebanon, as well as their experiences in the Middle East, provide important data on the long-term impacts of the kafala contracts on their labor relations, mobility, and autonomy. Due to the mobility restrictions and the nature of the kafala system, access to live-in domestic workers is very tightly restricted. Communication is monitored, their phones are surveilled, and their movement beyond the employer's home is severely limited. All of these factors represent barriers for ethically and logistically accessing live-in domestic workers whom we could directly contact to interview. As a result, the study ultimately focused on speaking to former domestic workers to discuss their experiences in Lebanon as a way of accessing more information with greater ease and flexibility without need to worry about live-in workers facing repercussions or surveillance.

Semi-structured interviewing is interviewer and participant-guided conversation, topic-specific and open-ended, and jointly constructed in the interview setting (Edwards & Holland, 2013). This type of method allows the researcher to probe participants' accounts through modifying questions, thereby facilitating emergent themes, i.e., resilience, coping mechanisms, or social support, to emerge naturally.

3.4.2 Setting and Recruitment

Interviews were also conducted at Insaaf Lebanon which is a safe place that the participants were familiar with. Before embarking on the research, my acquaintance with Insaaf Lebanon was by way of applying for a job in their center three years ago. Insaaf directed me to an NGO, where I worked as a caseworker for three years aiding migrant domestic workers in Lebanon. While I never worked directly as an Insaaf employee, I have contacted them a few times to refer migrant domestic workers to them who were in need of food parcels at tht time. My past working relation with Insaaf Lebanon served to impart trust and ease in the recruitment phase, while my direct work experience with MDWs supported my empathetic and reflexive interview approach. The name of the organization where I was employed is withheld for matters of confidentiality and personal safety, however my experience and professional background are acknowledged to influence my positionality within the research. This was one of the options that minimized anxiety levels, enhanced participant comfort, and facilitated freely expressing sensitive events. It is particularly important in interviewing individuals who may have been possibly exploited, coerced, or physically harmed to have interviews conducted in a neutral, safe place (Birch & Miller, 2000; Dickson-Swift et al., 2006, as cited in Edwards & Holland, 2013). Recruitment took place using purposive sampling, and ten women who had first-hand experience under the kafala system yet remained in Lebanon were given preference.

This approach was implemented in relevance rather than representativeness because it is standard in qualitative research (Guest et al., 2006; Baker & Edwards, 2012, as cited in Edwards & Holland, 2013; Edwards & Holland, 2013). Insaaf Lebanon also employed pre-existing networks of trust for recruitment to reach a hard-to-reach population in a safe and anonymous manner.

During the course of the interviews, a variety of emotional and ethical challenges emerged for me. Some domestic workers cried when recounting traumatic or humiliating experiences, and I often found myself becoming emotionally affected, nearly tearing up at times, in reaction to their stories. The emotional weight of their accounts, particularly about abuse, social isolation, and loss of autonomy, was heavy. In some instances, it took the participant time to establish enough trust to share personal accounts or information. Other times, participants emphasized a need for confidentiality, repeating at least a few times throughout the interview that they needed the safety of being given an alias and that their real names not be used in the research for safety reasons, fear

of retaliation from former employers, or their potential deportation as a result of their undocumented or irregular status. These moments signified the vulnerability of participants and served as the basis for remaining committed to conducting the interviews with sensitivity, empathy, and strong ethics to ensure their anonymity and addressing their emotional wellbeing.

3.5 Philosophical and Epistemological Position

The design is guided by interpretive and feminist epistemologies, whose emphasis is that knowledge is co-constructed during interaction and is embedded in participants' lived experiences. Contrary to positivist research design, where interviews are seen as objective instruments utilized for obtaining factual data (Williams, 2000; Whyte, 1996, as cited in Edwards & Holland, 2013), the study is aware that interviews are social interactions that are influenced by researcher positionality, context, and power dynamics (Yanow & Schwartz-Shea, 2006; Kvale, 1996, as cited in Edwards & Holland, 2013). A reflexive stance offers exposure to the researcher's values, identity, and social position, and how these impact data gathering and interpretation (Denzin & Lincoln, 2011; Mason, 2002, as cited in Edwards & Holland, 2013)**.** Feminist methods also bring forth the ethical responsibility to give voice to marginalized populations and to acknowledge participants as active agents in knowledge production (Oakley, 1981; Hammersley, 2012, as cited in Edwards & Holland, 2013).

This epistemological grounding directed methodological considerations of semi-structured interviews as well as purposeful selection of participants within a safe interview setting, and reflexive, empathetic engagement with participants' accounts. The interviews were framed and situated based on these considerations, which situated qualitative interviewing not just as a method of data collection, but an ethically and socially situated practice that had the potential to produce rich contextualized knowledge about MDWs everyday lives and experiences.

3.6 Data Analysis

All interviews were recorded with the agreement of participants for an exact transcription as well as meticulous analysis (Luker, 2008; Stockdale, 2002, as cited in Edwards & Holland, 2013)**.** The transcripts were coded and analyzed through thematic analysis; a method that is appropriate for naming, interpreting and reporting patterns and meaning in qualitative data (Braun & Clarke, 2006, as cited in Edwards & Holland, 2013).

Thematic analysis went through the following process of: becoming acquainted with the data, developing initial codes, searching for themes, reviewing and revising themes, and reporting (Braun & Clarke, 2006, as cited in Edwards & Holland, 2013). The coding was inductive in view of allowing themes to emerge from the stories of participants but was also deductively informed by research questions related to employment contexts, mobility constraints, and coping strategies. Reflexive thinking was used throughout the analysis process to consider the researcher's role in coding and interpretation that supported ensuring participants' voices were the predominant and central authority in theme development (Bourdieu et al., 1999; Doucet & Mauthner, 2008, as cited in Edwards & Holland, 2013).

This method facilitates a co-constructed knowledge that is situated and contextualized; therefore, it fits with feminist and interpretive epistemologies. This allows for the identification of complex social processes - power relations, emotional labor and resilience strategies - while recognizing meaning is dynamic, relational and situated.

As a researcher, I acknowledge the view that my identity and experiences shape how I engage with participants and interpret their narratives. As a Lebanese woman who was born and raised in Lebanon and currently enrolled in a Master's program in Mobility Studies in Padova, I have sufficient knowledge of the Lebanese society and social norms and cultural contexts, thus informing the design of the study and the engagement with the participants therein. Moreover, I worked in Lebanon for three years as a caseworker assisting abused migrant domestic workers, which provided insight into the structural, social, and emotional challenges faced by migrant domestic workers. Thus, alongside facilitating the building of rapport with the participants-as well as being an enabling factor-great reflexivity from my side was required, such that my interpretations would be based predominantly on the participants' accounts rather than my prior assumptions or experienced-based knowledge.
The approach I adopted throughout the research process was reflexive, utilizing journaling and reflective memos to examine critically my own influence on data collection and analysis. An awareness of positionality allowed me to exercise responsibility in the negotiation of power, creating an environment considered to be safe and participatory in which the voice of the participant was central to my research. While being transparent about my position in the research, it was guaranteed that knowledge would genuinely emerge from an understanding co-constructed

by participants and the researcher-a process consistent with the feminist and interpretive epistemological framework on which this study is grounded.

3.7 Ethical Considerations

Ethical principles were integral to the development of the research design. The participants were given consent forms summarizing the rationale for the research, the voluntary nature of participation, and the confidentiality measures measures (Edwards & Mauthner, 2012; Miller & Boulton, 2007, as cited in Edwards & Holland, 2013). In addition, written consent was formally obtained and continuous consent was emphasized during the course of the interview as a process, thus being able to maintain the autonomy of participants (Kvale, 1996; Wiles, 2012, as cited in Edwards & Holland, 2013).

Power dynamics, feelings of being vulnerable, the emotional labor of the interview process, and any anxiety that may arise were all areas of ethical consideration, given that the participants were situated in a vulnerable position (Oakley, 1981; Bhavnani, 1993; Mahtani, 2012, as cited in Edwards & Holland, 2013). The reflexive strategies that were employed during interviews included considering the positionality of the researcher, being framed to consider the emotional context of the discussion, and if the interview presented stressful or sensitive topics, offering reassurance and emotional support along the way. To support the ethical process, the interviews were conducted at Insaaf Lebanon in spaces which the participants were comfortable in, thus allowing participants to feel safe to articulate their stories.

3.8 Limitations

The study has several methodological limitations. First, the small sample size (10 participants) limits the study's generalizability. However, the qualitative method aims to establish an in-depth analysis rather than provide statistical validity.
Second, the recall bias may affect participants' testimonies on past employment experiences because researchers rely on narratives rather than direct observations. Thirdly, interviews are relational and co-constructed, which means they have an element of subjectivity. However, for this reason, reflexive practice is very important and themes were carefully analysed. Finally, the study only targets the MDWs who remain in Lebanon, meaning those who leave the country are not fully represented.

3.9 Use of Artificial Intelligence Tools

Artificial intelligence tools (Claude) were used during the writing process of this thesis for editing, formatting, and organizational purposes. Specifically, AI was utilized to:

- Refine grammar and sentence structure
- Improve clarity and readability of existing content
- Format citations and references
- Organize chapter structures and outlines
- Check for consistency across chapters

Importantly, AI was not used to generate original content, analysis, or research findings. All empirical data, theoretical analysis, interpretations, and conclusions are entirely the result of the researcher's own intellectual work. All participant quotes remain verbatim from interview transcripts without AI modification. The substantive content of this thesis, including the development of theoretical concepts (compound immobilization, tactical agency, experiential jurisprudence), analysis of findings, and policy recommendations, represents the researcher's original scholarly contribution.

3.10 Conclusion

This methodology chapter outlined the qualitative, semi-structured interview approach to investigating the experiences of migrant domestic workers under the kafala system in Lebanon. By appropriately employing purposive sampling, establishing rapport and trust during the interviews and analyzing the resultant data thematically, adequate rigor was assured. Despite the limitations in terms of sample size and recall and subjective nature, it enables a researcher to formulate pertinent questions about MDWs' past work experiences and strategies for dealing with social exclusion.

Chapter 4
Findings

Introduction

The results of in-depth interviews with ten migrant domestic workers who came to Lebanon using kafala as their visa status system are presented in this chapter. The women interviewed are from different countries: Kenya (Anna, Valerie), Sierra Leone (Hannah), Nigeria (Grace, Kaya, Naomi), Philippines (Ruth, Dahlia), Madagascar (Mira), and Sri Lanka (Ella). They have all experienced varying employment trajectories, including (but not limited to) working as live-in domestic workers and then leaving their employers to either move into freelance work or continue to work as independent contractors for a period of time, and have been in Lebanon for varied lengths of time—anywhere from four months to more than 30 years.

The findings are organized around this study's three central research questions: (1) How do migrant domestic workers engage in employment under the kafala system? (2) What strategies of coping, navigation, and resistance do they employ? (3) How do their lived experiences shape their understanding of mobility, agency, and labor relations?

The analysis demonstrates kafala as functioning through several interconnected ways of rendering people immobile: physical immobilization, social immobilization, and economic immobilization. It also shows how workers constantly exercise their agency by developing methods of resistance against these mechanisms of immobilization.

PART I: ENGAGING WITH THE KAFALA SYSTEM

Recruitment Deception and Financial Exploitation

Participants were recruited with false promises about their work and salaries. Anna from Kenya explained the costs and salary deception:

> "Yeah, I paid for my own medical, for my own ticket, and I paid him also his fee... $1,000... They tell me my salary will be 300. I reach here, you're telling me 200." (Anna)

Hannah from Sierra Leone was recruited as a trained nurse but discovered the deception upon arrival:

> "My purpose of being in Lebanon is to work as a nurse. Because I'm a graduate student from the medical school. When I arrived in Lebanon I asked 'where am I going to?' The policeman told me that this is your madam. She's the one that bring you in Lebanon. She sponsored you to come and work as a housemaid. At that time, I was shocked. I said to the man that no, my purpose of being in Lebanon is not for this one. I came to Lebanon as a nurse. I brought my license, statement of results, certificate, everything that belongs to me concerning my nursing affairs for me to work as a nurse." (Hannah)

Hannah also described the financial burden:

> "The money we spent in Sierra Leone, it's more than $2,000. The agent in Sierra Leone is a big liar. He didn't explain the facts. The agent [in Lebanon] sent the money to the agent there. The agent there is not giving us our salary." (Hannah)

Upon recruitment, prospective workers were deceived systematically regarding both how they would be employed and the financial terms associated with their employment. Workers were made to borrow money in order to pay their recruitment fees based upon false assurances involving professional employment at stated salary amounts; upon their arrival in Lebanon, they discovered that they would be employed as domestic workers at much lower rates than what was represented to them. As a result, workers became indebted, had their passports taken from them immediately after arrival, and were placed in an economically exploitive circumstance without opportunity for recourse or escape.

Passport Confiscation at Arrival

Without exception, all participants had their passports confiscated immediately upon arrival at Beirut airport. Valerie from Kenya described this experience:

> "We landed around 3 a.m. They came around and took all the passports. We asked, why do you take the passport? They said it's for checking in. We have more details to put in the

system that you arrived in Lebanon. And the details to go to the migration. That we understood. Little did we know, we'll never see the passport again." (Valerie)

Kaya from Nigeria and her friend were separated from other passengers and directed to a special area where their passports were immediately confiscated:

"We arrived at the airport. It was a little bit late that day. Imagine somebody that you don't know what's going on. So, me and my friend got in the line. The uniform guy said we should not stay there. We should come this way. We asked what's going on? And they took our passports. We didn't know what was going on. Nobody's explaining anything." (Kaya)

The passports were then handed directly to the employers who came to collect the workers:

"So, it was later, the people that came to pick us, two families, picked me up and they gave our passports to them."

This immediate confiscation of the workers' passports left these workers without any legal identification and/or the capacity to travel freely and as such, from the day these workers arrived in Lebanon, became fully dependent upon their employer for their livelihood. The practice (i.e. confiscation of the passport) on a systematic basis at the airport before the workers ever left the airport for their employer, indicates that confiscation of a passport is not solely an act of an abusive employer, but rather an institutionalized part of the kafala system.

Physical Confinement

Participants described severe restrictions on their movement, effectively making them prisoners in the households where they worked. Ruth from the Philippines explained:

"I could not leave the house for four years. I don't have day off with them. Four years. I don't take day off. I can go out, down to go to the market, because sometimes she needs me also something. And I can go down also and see my Filipina friends down the building only. But that [happened] after four years. [Before the four years] I go with them, but not go out alone. After four years, they gave me once a month day off." (Ruth)

Valerie described similar confinement:

> "I could not. I'm locked up. How could I run away? The only place I could run away is from her family house because I was not locked up. I was free. But then I had a question in mind. Why am I going without my documents? Where? To where? I don't know the police station. I no longer recognize the agent's office. And I don't know the way to the airport. I didn't have a day off. No, any day she goes out to bring the son back. I'm in Mama's house. And if I'm in the house, I'm locked up. There's no day off." (Valerie)

Confinement was not a single entity represented by merely having locked doors, but rather operated through several physical and psychological mechanisms. Through the processes of denial of days off from work; prohibiting workers from leaving home alone; limiting exposure to the physical environment to prevent escape from confinement; having their documents confiscated; lacking knowledge of the geographic area of confinement; and inability to communicate verbally in the local language, workers were deprived of the ability to escape confinement. Even when locked doors were opened, physical, psychological, and geographic confinement of workers continued due to their lack of access to their documents, their lack of geographic knowledge of the area around them as a result of restrictive confinement methods, and their inability to communicate verbally in the local language.

Degrading Living Conditions

Participants were forced to sleep in degrading conditions that signaled their devalued status. Ruth slept on a balcony for 7 years:

> "I was sleeping on the balcony. And my bed is folding bed, and I have one small cabinet, and the balcony, we put only curtains." (Ruth)

Anna from Kenya described similar conditions:

> "I had my own room. But this room was, you know where they store motor [generator], everything where they put the motor, electricity, meter, everything. That's where I used to sleep. The motor is here, the bed is here. Very, very bad. And noise, you know electricity,

> motor. When you want to pump water, it's there. You go put everything. Everything was in that room. So that's where I used to sleep. I have a small cupboard for my clothes and a bed." (Anna)

Beyond inadequate sleeping spaces, employers also controlled workers' access to food. Valerie from Kenya was systematically starved and told to lose weight:

> "She went to give me a cup of tea with a little sugar, one teaspoon. She said you are too big, you need to reduce my weight then I become perfect. She gave me Arabic bread, you know it's this round. So she removed one piece and give me one half of the piece I took for lunch. And in the evening I took the second piece with another cup of tea. This time round she gave me the green tea and she said you cannot take sugar because I want you to lose weight. That was the routine. That was my daily meal. Half of the bread. And for breakfast, you have also same. That's what I have in the morning with a cup of tea, morning dinner and a morning lunch with one teaspoon sugar and half the bread. Then in the evening I have the other piece." (Valerie)

The vile living conditions that the workers experienced (sleeping on balconies during the winter, sleeping in storage rooms next to generators) and the food deprivation they suffered had the effect of reinforcing their status as non-human beings. The substandard spaces provided to workers to sleep in (outside or in storage areas) as well as the intentional deprivation of food only served to show that domestic workers were seen by their employers as disposable objects, as opposed to being human beings who deserved basic dignity. The conditions experienced by these migrant domestic workers were not a result of an oversight on behalf of their employers, but instead served as a tool of the employer to assert his/her authority and make clear that the domestic worker was dehumanized by the employer in the employer-employee relationship.

Economic Exploitation and Wage Theft

Systematic wage theft was pervasive across participants' experiences. Hannah from Sierra Leone worked for eight months without receiving any payment:

> Interviewer: "So, you worked for eight months, and for eight months, they didn't pay you anything?"
>
> Hannah: "No."

When Hannah attempted to seek justice, she found no recourse:

> "I go to the police station to report them. At that time, this corona started. They said, let me go to my embassy. I tried to search. They told me that we don't have embassy in Lebanon, Sierra Leone only have consulate office. So I went to the consulate office to report them, but at that time, there is no justice for me, you know, there is no justice for me." (Hannah)

Valerie from Kenya experienced wage theft from multiple employers. Her first employer withheld her third month's salary, and her second employer failed to pay her for three months:

> "The girl came. She stayed there one month. I was teaching her to do the cooking and how to arrange the house for one month without salary. And my two previous months, she had not paid me." (Valerie)

Even when Valerie reported this to the Ministry of Labor, her employer refused to pay:

> "They told her to give me my salary. She said she cannot. She cannot give me when I'm traveling. They said it's my right." (Valerie)

Beyond direct wage theft, employers demanded substantial fees to release workers from their kafala sponsorship. Ruth from the Philippines, who worked for seven years on a two-year contract, explained:

> "I look forward that I want to fix my papers because my boss is asking $3,000. I said, I served you seven years. You don't need to ask for $3,000. He said, no, because we pay you $5,000. I said, I don't have $5,000. The contract is just for two years. I stay with you seven years. You already earn benefits too much from me. You don't need to ask more. You must release me for free." (Ruth)

Similarly, Kaya from Nigeria faced a substantial release fee demand. She had worked for an abusive employer for one year and three months before escaping to the Nigerian embassy. After eight months at the embassy, she was transferred to work for a new family, where she worked for five years under good conditions. When Kaya wanted to marry, her original abusive employer, who still held her kafala sponsorship, demanded a $5000 release fee:

> "The woman [first employer] demanded money. About $5,000... But $5,000 is a lot. To retrieve me and to fix my documents. It doesn't cost that much... Because he [the agent] said I was owing. As in the agent, you need to pay the money. Because I left when the contract was not finished. Yes. The contract made me three years. And I spent one year plus." (Kaya)

Her current employer paid the $5,000 to secure Kaya's legal transfer so she could marry and continue working for his family.

Recruitment agents also exploited workers financially. Mira from Madagascar had three months of salary confiscated by her agent:

> "She cut my salary. Three months. Three months salary she took." (Mira)

These forms of economic exploitation—complete non-payment, kafala release fees, and agent theft—demonstrate how the kafala system enables systematic wage theft with little recourse for workers.

Medical Neglect

Access to healthcare was systematically denied, forcing workers to either endure illness without treatment or pay for their own medical care.

Ruth from the Philippines explained that when she became sick with a cough that lasted two months, her employers provided no assistance:

Interviewer: "But once you got sick, when you were sitting on the balcony, did they try to save you? You said you had, like, a cough for two months or something. Did they take you to the doctor?" Ruth: "No. I heal, I buy my medicine alone, I heal myself alone."

Anna from Kenya faced similar neglect, with her employer threatening to deduct any medical expenses from her already-reduced salary:

> "Even if I'm sick, this man will not care. He tell me if he has to buy me medicine, he will deduct from my money."

Some employers provided only minimal treatment regardless of the severity of illness. Kaya from Nigeria described how her employer gave her only Panadol despite serious health complications:

> "She only gave Panadol. Only Panadol. She said, Kaya, I used to have headaches. It's normal. Continue. I'll be working. I was dying slowly. Then I got fibroid, so many things. My period will come. It will be morning. So, her only solution is to give me Panadol." (Kaya)

Valerie from Kenya's experience demonstrates how employers dismissed workers' illnesses as fabrication to avoid providing care. When Valerie developed serious respiratory problems from living in cold conditions and inadequate nutrition, her employer refused to take her to a hospital:

> "My chest got blocked. One morning I woke up, I could not breathe properly. She said, I'm a drama queen and I'm pretending because I don't want to clean the house and go to clean Mama's house. I said it's not what you think. Can you take me to the hospital? She said no." (Valerie)

Valerie was eventually taken only to a pharmacy, not a hospital, after her employer's husband intervened:

> "Her sister came and took me to the pharmacy not to the hospital. They gave me this something spray, the nasal spray because I was really broke from the cold."

Employers' perception of the workers as a resource to be used at will rather than individuals who need access to medical care is illustrated by the systematic denial of medical benefits. The workers were expected to perform their job duties without regard to physical conditions that may impact their ability to do so, and if a worker did need to see a physician for treatment, they were either required to pay high out-of-pocket payments, were accused of faking an illness, or were denied treatment.

Communication Control and Social Isolation

Employers consistently regulated the workers' ability to communicate, ultimately isolating employees from their family, friends, and other types of support systems. This created a dependence on employers and made it impossible for employees to request support when they experienced abusive treatment. The access workers had to a phone was severely restricted or completely eliminated.

Anna from Kenya had her phone confiscated after she reported abuse to the Kenyan consulate:

> "So he took my phone. He said every day he would give me only once, only to call my mother. And I called her when he was there."

Anna's calls were not only limited to once daily but also supervised, preventing her from speaking freely about her situation.

Mira from Madagascar experienced even more severe restrictions, receiving only one hour of phone access per month under surveillance:

> Interviewer: "And could you talk to [your family] alone or you have to talk to them in front of [your employers]?"

> Mira: "No [I could not talk alone]. We have a phone at home. And I call family. She giving one hour every month."

Valerie from Kenya was permitted weekly calls but given such limited funds that conversations ended before she could finish speaking to her family:

> Interviewer: "How often did you speak to your family and friends?"
>
> Valerie: "Once a week. She took me to the phone shop. And she paid 3,000 Lebanese Lira. The green money. She was only paying 3,000 Lebanese Lira. So by the time you say hello, they go and call my baby to talk to me. The money is done. And she said, you see you are using 3,000? The call is expensive to your country. I cannot take this."

Ruth from the Philippines was unable to contact her family for three months when she first arrived because her employer did not provide her with a phone or contact numbers:

> Interviewer: "And did you have like any difficulty contacting your family, or you had your phone with you?"
>
> Ruth: "Only maybe first, because I don't have phone here, and I don't have numbers. So I asked the madam, maybe three months. Three months it's hard for me."

Some employers actively sabotaged workers' attempts to maintain family connections. Ella from Sri Lanka wrote numerous letters home, only to discover months later that her employer had never sent them:

> "I was writing letters to send home to my family. So one day, I'm happy, because I'm writing letters, so many letters, and I give [the letters to my employer] to [give to] the post today. One day, I clean his car, I open the trunk and I see all my letters. So he wasn't sending the letters. Imagine how disappointed I was and sad." (Ella)

Kaya from Nigeria had to resort to hiding her phone and communicating with her family in secret:

> "I had my phone. She didn't know I hid my phone. I hid my phone. Trying to hide it very well so she doesn't take it. So, I was able to communicate with my family."

The employer's driver, witnessing the abuse, secretly helped Kaya by purchasing a SIM card for her:

> "The driver was so nice, gave me a sim because he saw what they were doing to me."

Beyond controlling phone access, employers enforced broader social isolation. Anna was explicitly forbidden from interacting with visitors:

> "And also, if anybody comes, like even if they come and knock, knock, don't go near that gate. Don't talk to anybody. If the visitors come, not too much interaction, questions. No. Serve what you are serving. If they ask you anything, don't answer them. Go inside."

Mira described how employers silenced workers even within the household:

> "You're not allowed to talking, if the madam telling something, she wrong, you, you must quiet."

Systematic control of communication serves multiple functions, such as preventing workers from understanding their rights, creating supportive networks with other domestic workers, reporting abuse to authorities or non-governmental organizations, and having access to their families, which could provide them with emotional support. Because workers were cut off from all outside communications, they were completely reliant on their employers, and they had no way to reach out for assistance or to escape.

PART II: STRATEGIES OF NAVIGATION AND RESISTANCE

Everyday Resistance

While the restrictions inherent in the kafala system hindered participants' ability to act freely, participants still exhibited their agency in many forms of resistance (i.e., through their acts of defiance, disobedience, and in some cases, escape). Resistance acts of this kind show that workers

are capable of demonstrating agency even under a system which is calculated to remove all instances of their agency.

Anna from Kenya employed strategic compliance to create opportunities for escape. After months of abuse and confinement, she deliberately changed her behavior to gain her employer's trust:

> "So when I saw it's too much like that, I started the fourth month. That's when I devised a plan to go. And I say, if I continue being in this situation with this man like this, I'm angry. He's angry. I show him that I'm angry with you and I know you're treating me badly. I will not be able to leave this house. So I changed. I changed and became very good at whatever he say, I do it. I show him I'm comfortable with whatever. And if he gave me that food, I started eating. I started doing what he wanted." (Anna)

This strategy succeeded:

> "So he started even allowing me to go outside, sweep outside the house. Yes. And go clean his cars outside... And he gave me back my phone."

Anna also refused to sign contracts she could not read, insisting:

> "I said, no, I cannot sign what I don't know. It's written in Arabic. You're telling me to sign. What am I signing?"

She documented her living conditions and reported the abuse to the Kenyan office:

> "I started complaining to the office. I even recorded the video. I showed them where I'm sleeping. The office in Kenya. I sent to Kenya."

Kaya from Nigeria carefully planned her escape over time. She discovered and hid a spare key, testing it repeatedly when her employers left the house. To avoid detection by surveillance cameras, she covered them as she was testing the keys and before escaping:

> "Sometimes there's some places they pack a bunch of keys. So I use every time they are not at home, they lock me, I used to use it to try, to try. And then cameras were focusing

> near the door. You know what I did? You know, you can do everything because you want to escape. I climb, I use something close the camera. I don't know, but this was what I did." (Kaya)

She timed her escape for Friday when the building concierge attended prayer as her employer was out of country:

> "I know that Friday, they go for Juma prayer. So that's how I escaped."

Kaya fled directly to the Nigerian embassy, which provided immediate protection:

> "So I ran to the embassy. I was shaking. The embassy said, calm down. As you have come here, you have come like this is your country. This is your home. Don't be afraid. You are safe."

Mira from Madagascar escaped by leaving the house to work at a hospital cleaning job she had secretly arranged through another worker. Her employer had trusted her with the key to the safe where the passport was kept. Before leaving, Mira used this key to retrieve only her own documents:

> "I take my paper. My passport. I take it with me because the key [of the safe] is with me. I take my passpoer and I leave [the key next to] madam sleeping. But my paper, my passport, I bring with me. My contract, all everything for me, I take it. Nothing else I take but just my passport, my things." (Mira)

Despite threats from the recruitment office, Mira persistently called to complain:

> "And I'm always, I calling the office, I'm calling. Till the office say, if you want, if you run away, like this my office, if you want run away, you not go alive your country, you dying here, we are killing you."

Hannah from Sierra Leone resisted by asserting her professional identity, refusing to accept work as a domestic worker when she had been recruited as a nurse:

> "I said no, I'm not gonna work. I want to go back home. If I'm not going to work in a hospital, I showed my certificate, license, passport, everything. Then the agent said no, I'm very sorry, you're supposed to work and this madam... I said no, I still insist that I'm not going to work as a Kadama housemaid." (Hannah)

Despite the fact that the kafala system was designed to prevent workers from being able to act on their own, many workers resisted through escape and legal recourse. Examples of how workers rebelled against being oppressed through the kafala system include strategic compliance with employers, keeping records of abuse against them, refusing to sign contracts without understanding them, disabling the surveillance cameras while leaving their employer's premises, timing their exit to be as advantageous as possible (when they would have the best chance of success), obtaining documentation on what was done to them, asserting their own professional identity, and contacting embassies and government officials for assistance. The actions of workers demonstrate that they were not merely passive victims of the kafala system but actively stood up for their rights.

Building Networks of Support

Despite isolation and confinement, participants built crucial networks of support through embassies, fellow workers, sympathetic individuals, and NGOs.

Ruth from the Philippines faced a life-threatening medical emergency requiring surgery. After her employer refused to help despite three years of work, Ruth turned to the Philippine Embassy:

> "I went there, NWO Philippine, Philippine Embassy. I asked them... The amount is 2,500 and they showed that they're okay. And they told the doctor, I give them the doctor's report and all the results. But the one day before operation, they told me that they will pay only half... And I have only 1,000 in my pocket to keep saving for in case of medicine... But then they pay, the NWO pay it... They paid the hospital bill, 2,500." (Ruth)

Fellow workers and unexpected allies provided crucial assistance. Hannah from Sierra Leone received advice from an Ethiopian worker at the recruitment office:

> "By then, the Ethiopian girl told me that whenever he came and asked you that if you are ready to work, you have to say yes, because I really want you to go out of this office. Because this man is very wicked."

Anna from Kenya connected with other African workers through social media, which enabled her escape:

> "So I joined TikTok. The moment he gave me my phone and I started looking for TikToks. People who work in Lebanon. Africans. So I saw girls taking outside... And I inboxed one girl."

This connection led directly to assistance:

> "Yeah, she sent a man, a taxi man... He's the one who came and helped me."

The networks formed through the use of workers' communication systems; embassies offering protection; drivers offering secret communication systems; fellow workers creating survival strategies; and enabling connections through social media and other forms of communication, and humanitarian organizations providing physical assistance, have been described as "lifelines" that workers have created in response to a system of isolation designed specifically to isolate workers.

Desperation and Survival

When escape routes were blocked and abuse became unbearable, some participants reached points of extreme desperation where survival itself felt uncertain.

Ella from Sri Lanka contemplated suicide after her employer sexually harassed her. Isolated and unable to communicate with anyone, she considered jumping:

> "One day I run away, why I run away, the mister, the middle of night, he come to my room, so next day, I, I, angry and scared, when he came kitchen, I scared, I want to talk with someone, what happen, like a, like a mental, even today, if something happen, I want to talk with someone. With who talk, you know, today we have phone, we can talk with our

> friend, that time, I'm, you're alone, alone, so, after I'm think, think, think, you know, I think one day, I want to jump in the, I want to die, really." (Ella)

Ella eventually went to the agency, but they returned her to the same employer.

Kaya from Nigeria also reached a breaking point after enduring severe abuse and wage theft. She contemplated drinking bleach:

> "When I knew, I saw that I cannot contain it anymore. I was dying. There was a time, I wanted to mix flash. You know flash? I wanted to drink it." (Kaya)

Grace from Nigeria arrived in Lebanon expecting to attend a church program but was immediately abandoned by her agent at the airport:

> "Yeah, the first time I came to Lebanon, I was so... I moved as I was coming here. My agent was communicating from Nigeria to the airport. This airport here, I called the agent, he didn't answer. It's not connecting. I was stranded because I don't know anywhere. I don't know anybody... I called the agent. I called the agent. Agent did not pick my call." (Grace)

With limited money, Grace had to find and pay for a hotel herself before eventually being connected with other Nigerians who helped her survive.

The psychological effects of the kafala system are evident in instances of desperation (i.e., suicide, self-harm) due to its dynamics (e.g., loss of autonomy or agency). With no means of safety to turn to, the kafala system enables an environment where some individuals may succumb or turn to death as the sole escape from a life of suffering. This indicates that the kafala system does not only create violence through physicality, but also creates excessive and damaging psychological trauma.

Transformation Through Advocacy

Several participants transformed their traumatic experiences into advocacy work, using their knowledge to help other migrant workers navigate the kafala system and connect with support resources.

Hannah from Sierra Leone became involved in advocacy work with Concern Worldwide International, leveraging her nursing background and lived experience:

> "Sometimes I participate in different sessions. Like there is a time I made an interaction with one of my friends and she connected me with one of the workers from Concern Worldwide International. She told me that as she saw me, I'm very brilliant. I'm very bold to talk and I'm hardworking. And as I studied nursing, I have experience on those things based on the thing they want to be doing. So she connected me with one of the men that make the program. So one day they called me for a session. The way they see me, the interaction, the way I'm speaking, the way I'm collaborating with them. So they promised me that when they want to sign a contract, they need a voluntary people Africans to work with them. So they took me. We do an advocacy for breastfeeding." (Hannah)

Kaya from Nigeria founded her own community organization to support other migrants:

> "So we are doing advocacy on this. So that we need to reach out to the agents... We want to see how we can. We are on it. Mobilizing. Letting every migrant. Let them know. Maybe create awareness. Talk to them on this... I have an NGO already now. I opened a community. It is called Sister with a Strategy. I have a partner. We are coming up. We are new. So this is one of our. We want to bring hope to them. We want to empower them. We want to bring transformation to their life. We are focusing on community, single mom and girl child. We want to really start advocating for them." (Kaya)

Kaya's advocacy work includes warning prospective migrants about recruitment deception and connecting workers in crisis with resources like IOM for repatriation.

Ella from Sri Lanka built networks across nationalities to support migrant workers and work toward systemic change:

> "But now, I, I have the group, my own group. Also, in Lebanon, we are different nationality. We have other group, the African and Asian. Once a month, we meet together. Also, we discuss and we make a nice plan to the future. We know it's not easy, the change,

> but we want to share, maybe, after me comes someone. They know what we do, what we've done, and they can continue and then what we've done." (Ella)

Ella emphasized the importance of workers supporting each other:

> "We, we still now share, if we, you're working in house without food, without salary, without many things, don't continue work. Let us know, we can support, how we can support."

Through advocacy, including creating organizations, participating in public awareness campaigns, establishing cross-national solidarity networks, etc., participants did not simply accept their victimization. Rather, they turned that victimization into an opportunity for collective action. They provided a way for their experiences to act as the foundation of networks for other workers and were engaging in dismantling the systems that had caused them harm.

PART III: RECONCEPTUALIZING MOBILITY, AGENCY, AND LABOUR RELATIONS

Freedom as Mobility and Autonomy

Through experiences of immobilization, participants came to understand freedom as fundamentally connected to physical movement and the ability to make autonomous decisions about their daily lives.

Kaya from Nigeria explicitly connected freedom to being able to go out and make decisions. When asked about working for her second employer after escaping, she explained:

> "Yes. I have my freedom. Okay. I go out, go and buy spinach, do whatever I want to do. The man even told me. [His daughter] Nur buys the things, but Nuru prefer taking me in the car. We go and buy. He says, go and take anything you want. That is the way we man be. If they treated me like this, there was no way I want to go out, run away. I was even praying not to leave this second one." (Kaya)

For Kaya, freedom meant being able to leave the house, make purchases, and have control over daily decisions—basic autonomy she had been completely denied in her first placement.

Anna from Kenya articulated how restriction of movement translated to a loss of fundamental human dignity:

> "I think that the domestic workers need freedom to express themselves. And it should not be because it's like a law that always the boss is always right. No, it's not. Or because me, you know, I'm vulnerable. I don't have that money. He bought me. You see, because for my case, they used to say, I'm a slave. He bought me." (Anna)

For Anna, freedom to move and express herself was inseparable from being treated as a human being rather than property.

Grace from Nigeria emphasized how lack of legal status prevented basic freedom of movement:

> "It would be okay to change it. Yeah. It will help us. So that, like now, even for a year now, we don't have a rest of money. Tomorrow they say, police catch me, police catch me. Okay, like now, two days ago, I went back with one of my friends. We go home somewhere, we don't have a personal freedom. So, around 9 o'clock, as we are coming, the police, the judges stop us." (Grace)

Testimonies reveal how physical mobility wasn't just a feature of a worker's definition about being free, but instead much more so that it served as the fundamental condition of freedom. When a worker is confined, surveilled and immobilized, his or her definition of being free will now fundamentally change based upon the absence of these things from one's life. Additionally, workers are often afraid to venture out from inside their homes or go anywhere near a police officer during the limited free time that they have available to them.

Labor as Dignity and Respect

Participants articulated visions of labor relations based on mutual respect and human dignity rather than ownership. They explicitly named the kafala system as creating relations of property rather than employment.

Valerie from Kenya directly critiqued the ownership structure inherent in kafala:

> "Because the problem in itself, it's kind of ownership. Like there you go buy a car or you buy a house. So you have the right to do anything and even your neighbor cannot question you. But don't forget we are talking about human beings here. By no means can you own a human being. You cannot. No matter how much you pay." (Valerie)

For Valerie, the fundamental problem was that kafala treated workers as purchasable property, subject to the same absolute control as inanimate objects, rather than as human beings deserving of basic rights and protections.

Naomi from Nigeria connected the kafala system's control structure to the denial of workers' most basic needs:

> "They should not allow the madame to matriculate. Because some of these, they go through a lot in madame's house. Sometimes they don't feed them. They use them to work and work and work and work and we will not feed them... I wish the kafala can help the migrant... so they should make, they should do a lot that will help these girls, not to be mistreated." (Naomi)

Naomi indicates through her evaluation the expectation of a more dignified work relationship is through all necessary legal protections but also through acknowledging the basic need of all workers to have their basic human needs met (adequate food/rest and freedom from constant exploitation). Naomi provides a vision of kafala and how it can be transformed to be about the welfare of the worker, rather than the control of the employer.

Mira from Madagascar repeatedly used the phrase "slave modern" (modern slavery) to describe the kafala system:

> "This kafala system is like slave modern. Yeah. New slave." (Mira)

> "Here in Lebanon, it's like a slave, like slave, not it's like, but slave modern. It's a slave, but changing their name, like this, but all, everything who do in the house, you're slave, slave, slave." (Mira)

According to Mira, kafala is nothing more than a form of slavery rebranded with new terminology, as it still preserves the same basic principles of domination and subservience. The testimonies demonstrate that all of the workers understood that under the kafala system, they were using their labour to establish a relationship based solely on ownership instead of employment. They rejected the humiliating notion that by paying recruitment fees, they were giving employers the "right" to treat them as property or commodities. They articulated an alternative vision based on mutual respect, human dignity, and the notion that individuals cannot be owned, regardless of the monetary cost.

Chapter 5
Discussion

5.1 Introduction

This research aims to assess the ways in which migrant domestic workers interact with and respond to employment conditions of Lebanon's kafala system. More specifically, the research focuses on how migrant domestic workers are affected by kafala, the methods that they deploy to circumvent or resist restrictions placed on them by kafala, and how their experiences of living with kafala inform their understanding of mobility, agency, and labour relations while working within the framework of kafala. This research is based upon in-depth interviews with ten migrant domestic workers representing Kenya, Nigeria, Sierra Leone, the Philippines, Madagascar, and Sri Lanka. The results of this study demonstrate that while the kafala system employs a number of interrelated mechanisms for incapacitating human beings through physical, social and economic means, the evidence also supports the continued agency and resistance of kafala workers.

This research aims to assess the ways in which migrant domestic workers interact with and respond to employment conditions of Lebanon's kafala system. More specifically, the research focuses on how migrant domestic workers are affected by kafala, the methods that they deploy to circumvent or resist restrictions placed on them by kafala, and how their experiences of living with kafala inform their understanding of mobility, agency, and labour relations while working within the framework of kafala. This research is based upon in-depth interviews with ten migrant domestic workers representing Kenya, Nigeria, Sierra Leone, the Philippines, Madagascar, and Sri Lanka. The results of this study demonstrate that while the kafala system employs a number of interrelated mechanisms for incapacitating human beings through physical, social and economic means, the evidence also supports the continued agency and resistance of kafala workers.

As a Lebanese researcher with prior experience working with migrant domestic workers, my positionality shaped both data collection and interpretation. Throughout the analysis, reflexive practices including journaling and memo-writing were employed to ensure participants' voices remained central while acknowledging my role in the co-construction of knowledge.

The theoretical concepts developed in this Discussion have been derived through a process that is consistent with the inductive-deductive equilibrium of the methodology. The existing body of

research (Fernandez, 2021; Block et al., 2023; Marchetti et al., 2021) provided broad conceptualizations such as “control” or “restrictions.” However, the initial codes focused on the participants’ own words and experiences: participants spoke of feeling “locked inside,” having their passports “taken,” being unable to “call family,” of “hunger,” and of dealing with several constraints at once. The specific mechanisms (physical, social, economic, medical, and communicative) and, importantly, the combined effect of these mechanisms were derived from the participants’ narratives rather than existing theoretical concepts. Following the work of Fernandez (2021), who argues that the mechanisms of control in the context of kafala can be understood as diffused coercion, the present testimonies suggest that the mechanisms of control are not only diffused but also constitutive in the sense that they are interdependent, i.e., the effectiveness of one mechanism is dependent on the effectiveness of the other mechanisms of control. Such an understanding, based on the lived experiences of the participants as they were articulated, constitutes the theoretical contribution of compound immobilization, as well as the concepts of tactical agency and experiential jurisprudence, as they were used in the present analysis through an iterative dialogue between the data and the literature.

In this discussion chapter, the empirical results are positioned in the context of existing literature on the kafala system, migration and domestic labour. The chapter discusses Lebanon as the context for the study of these issues and illustrates how the participants' experiences both confirm and extend theoretical understanding of sponsorship-based migrant systems, racialised control of labour, and workers' resistance to control. The chapter is structured according to the three research questions and draws together the twelve findings sections identified in the data with the theoretical frameworks developed in Chapters Two and Three.

The chapter will be organized as follows: (1) Responding to Research Question 1 by exploring how workers engage with the control mechanisms embodied in kafala systems throughout their recruitment process as well as their working lives; (2) Addressing Research Question 2 by exploring how workers navigate, resist, or simply survive kafala systems; (3) Addressing Research Question 3 by exploring how workers develop their critical consciousness through their experiences with kafala systems. The section will seek to synthesize the answers obtained for the three research questions above by exploring how these answers can contribute towards developing a better theoretical understanding of kafala systems as systems of control as well as spaces of

contestation. The final section will reflect on the implications of the answers obtained above for policy, practice, as well as further research.

5.2 Engaging with Kafala: Mechanisms of Immobilization

5.2.1 The Architecture of Control: From Recruitment to Arrival

Research Question 1: How do migrant domestic workers engage in employment under the kafala system in Lebanon?

The findings place kafala, as suggested by Fernandez (2021), as a "diffused system of coercion," whereby the system exercises its power through various interlinked mechanisms that were set up before the migrant workers came to Lebanon. The findings regarding the deceitful practices in the recruitment of migrant workers affirm that control begins through the systematic misrepresentation of the terms of employment to the migrant workers from the countries of origin. For instance, the experience of Hannah, whereby the migrant worker was misled to come to Lebanon to work as a qualified nurse but was coerced to work as a maid, is an indication of the illegal practices in the recruitment of migrant workers, as suggested by the International Labor Organization, Regional Office for Arab States (2017).

The initial deception serves a number of purposes within the kafala system. First, it leads to debt bondage, as migrant workers such as Anna are charged recruitment fees of $1,000 based on advertised salaries of $300 per month, only to receive $200 upon arrival. This serves as evidence of recruitment fees being high and information being misleading provided by both Lebanon and countries of origin as discussed by Ghaddar et al. (2020). The dual condition of being indebted combined with the confiscation of passports on arrival makes migrant labor susceptible to the "structural violence" as classified by Gardner (2010), as cited in Saravanamuttu (2018). Hannah is a compelling example of migrant labor who has fallen prey to the fraudulent employment scheme as she was promised to find employment as a nurse, investing more than $2,000, only to find on her arrival that she was to be employed as a "housemaid." Such an employment scheme is an example of fraudulent practice as classified by Ghaddar et al. (2020) as well as Puig-Ferriol Cabruja (2021).

Secondly, the uniform and systematic passport confiscation at the airport at Beirut indicates the institutionalized nature of the kafala system. The accounts of Valerie and Kaya make it clear that passport confiscation is the result of state-sanctioned measures at the airport itself. This finding not only confirms the assertion of Saravanamuttu (2018) that the kafala system represents the transfer of the power of the state to the private sponsor but also how the Lebanese state apparatus facilitates this process by systematically routing the workers through the employer at the airport itself before the workers leave the airport.

Valerie's experience offers specific information on how the passports had been confiscated for "checking in" and "details to go to the migration," so that it looked like it was part of official procedure. In the same manner, Kaya and her companion were led to an area designated away from other passengers, where "the uniform guy" took their passports that would be delivered straight to the employers who had come to collect them. This pattern matches Fernandez's (2021) finding of one of the four interlocking components of kafala: state-enforced subordination. Indeed, the Lebanese state has institutionalized passport confiscation in the airport procedure of migrant domestic workers' arrival.

This result disputes the reform recommendations that see the confiscation of passports as an anomaly that demands the tightening of existing bans on the practice (International Labour Organization, Regional Office for Arab States, 2017). Instead, the evidence suggests that passport confiscation is a key building block of the kafala system, actively facilitated by the Lebanese government. The normalizing of this process at the airport demonstrates how bureaucratic systems are involved in the creation of migrant domestic workers' vulnerability through their engagement with the hiring process, as argued by Block et al. (2023).

5.2.2 Physical, Social, and Economic Immobilization

Findings on physical confinement, degrading living conditions, economic exploitation, medical neglect, and communication control discuss the immobilization created by kafala systems through various means. The physical immobilization, as demonstrated by the four years Ruth spent without days off and Valerie spent locked indoors, exists not only through physical locks but through the complex web of immobilization as explained in this study. Employees are trapped even if the doors are unlocked because the confiscation of documents, physical disorientation in new locations,

inability to communicate through new languages, and complete social isolation combine to immobilize the employee.

Valerie's testimony powerfully illustrates this: "I could not. I'm locked up. How could I run away?" Even when living at the employer's family house without physical imprisonment, escape was impossible because she was burdened with unanswered questions: "Why am I leaving without my documents? Where? To where? I don't know the police station. I no longer recognize the agent's office. And I don't know the way to the airport." This testimony demonstrates how confinement operates through multiple overlapping mechanisms: (1) document confiscation, which criminalizes their presence outside employer control; (2) geographic disorientation; (3) complete social isolation; and (4) language barriers. This multi-layered confinement can be identified with the vulnerability pointed out by the ILO (2016a) in live-in workers. The results extend this to highlight what can be called an "infrastructure of immobilization," which is an amalgamation of various factors that keep these workers imprisoned despite the doors being unlocked.

Furthermore, besides the aforementioned spatial restraint, the evidence on the deteriorating living conditions provides an example of another manner in which the spatial relations between individuals in the home led to the dehumanization of the workers. Ruth slept on the balcony at her employer's house, where she had placed her furnishings, including a folding bed, cabinet, and some curtains, for seven years. Anna lived in the storage room where the generator, electricity meter, and water pump are located, describing conditions as "very, very bad." These sleeping conditions must be considered a form of spatial violence, in that the placement of the workers in these areas physically embodies the fact that the workers are less than human. This degradation aligns with Bechtold et al. (2022) and Marchetti et al. (2021). Participants' accounts reveal that these conditions existed in plain sight for employers on a daily basis. Ruth's balcony "room" was where the family regularly assembled for coffee and nargile in the evenings, meaning she had to wait until they finished to sleep.

The neglect spread from sleeping facilities to include food deprivation as a systematic practice. Valerie's employer directly told her to "reduce weight" as she strictly followed a meager diet consisting of half a piece of Arabic bread for lunch and the other half for dinner, along with tea with minimal or no sugar. This starvational diet amounted to structural violence producing both

physical and psychological harm, as Zahreddine et al. (2014) would describe. The deliberate nature of her deprivation suggests that her employer was intentionally subjecting her to hunger. This confirms Chammartin's (2004) argument showing that control extends into the most private realms of her bodily experiences. The correlation of deteriorating living conditions to food insecurity sheds light on the existence of "corporeal control" which is the control of workers' bodies through the limitation of their territory, sleeping conditions, and hunger. Together, these mechanisms produced what Zahreddine et al. (2014) identify as accumulated stress and deprivation that manifests in psychiatric morbidity, undernourishment, and psychological breaking points.

5.2.3 Economic Exploitation, Medical Neglect, and Communication Control

Results related to economic exploitation and wage theft show how economic systems have contributed to the enslavement of the laborers. These economic systems include the total non-payment approach, the agent theft approach, as well as excessive kafala fees and they show economic dependency according to Block et al. (2023).

The strongest example of wage theft, however, is found in Hannah's lengthy period of non-payment, lasting eight full months. When she attempted to seek justice through police authority and a Sierra Leonean consulate, she found that "No justice for me." This is consistent with Yimer et al.'s (2025) description of the "cycle of legal immobility," where workers cannot turn to authorities without risking residency status loss. Hannah's case demonstrates how this cycle operates: without embassy representation (Sierra Leone has only a consulate in Lebanon, not a full embassy), and with COVID-19 disrupting services, she had no institutional support to pursue her wage claim. The case shows the impossibility of the Kafala system to produce justice since filing a complaint means endangering legal residency because the migrant's status depends on the employer which is the same one they have complained against.

Perhaps the most revealing, though, were the excessive "kafala" fees levied when the migrants tried to switch employers or marry. Ruth, who worked seven years on an initial two-year contract, was asked for $3,000 to be released from her kafala sponsorship despite having already generated far more value than her initial recruitment cost. Kaya faced a $5,000 release fee demanded by her original abusive employer when she sought to marry, despite having worked for a kind employer for five years. The release fees make evident that the underlying logic of the kafala system is that

of treating the worker as property that can be transferred through sales transactions. There is also evidence of the "economic immobilization" of individuals; in this case, Kaya's former employer paid out as much as $5,000 to "retrieve" her in a transaction more akin to retrieving a piece of property instead of retrieving her from a contract of employment.

The findings related to the medical negligence include the deliberate lack of providing medical services to the workers, who consequently suffer while sick without the required medication. In the case of Ruth, she suffered from an untreated cough for the last two months while relying on her own medication that she purchased. In the case of Kaya, she was provided with Panadol for her significant health issues that she suffered during the time she was working under the employer in question. These issues include fibroids and menstrual disturbances that she described as "dying slowly." In the case of Valerie, she suffered breathing issues while being termed by the employer as a "drama queen" for malingering her illness.

Medical negligence in the case of Valerie can be described by the employer's deliberate decision to ignore the health issues of the employee while acting as the gatekeeper who determined whether the health issues being raised by the employee were real or fake. This action by the employer can be related to the extension of the meaning of the term "medical negligence" by the ILO (2009, 2014b). From the findings related to the three employees under the employer in question, the kafala system can be related to the structural characteristics that were analyzed by Zahreddine et al. (2014).

Findings on communication control proved that employers systematically dismantled workers' social connections. The ways of communication control identified (phone confiscation, monitored calls, restricted call minutes, complete ban on sending letters, and enforced silence) are illustrative of overlapping modes of immobilization identified by Block et al. (2024). Anna's phone was taken away after reporting abuse to the Kenyan consulate. Mira got calls once per month for an hour, but they were monitored. Valerie got calls once per week with limited credit (3,000 Lebanese Lira), causing calls to end before she could finish speaking with her daughter. Ella wrote plenty of letters, but months later found that her employer never sent them; they were in his car trunk.

Such practices go beyond inconvenience and form the basis of "communicative annihilation" which is the deliberate diminution of workers' ability to maintain relationships, communicate abuses, or receive information about rights. Mira's testimony reveals control of silence even within the house where she worked: "You're not allowed to talking, if the madam telling something, she wrong, you, you must quiet." This led to profound social isolation. Anna could not even go near or speak to guests: "If anyone comes, anyone knocks at the gate, don't go near, don't speak to anyone." This isolation prevented workers from knowing their rights, bonding with other workers, reporting abuse, and connecting with families. All ten participants had systematic control of their communications, irrespective of nationality or time, confirming this as a structural aspect of kafala, in line with Fernandez (2021).

5.2.4 Synthesis: The Compound Architecture of Kafala Immobilization

Taken together, the evidence regarding recruitment, passport confiscation, detention, inhumane living conditions, economic exploitation, medical neglect, and communication suppression indicates that kafala systems function through "compound immobilization." This system involves the simultaneous application of physical, social, economic, medical, and communicative control, which work in tandem to immobilize the laborer in exploitative situations. This refines Fernandez's (2021) idea of 'diffused coercion' by specifying the system of coercion and its interactive process.

The employees could not escape physical detention without documents. Document retrieval required employer collaboration. Collaboration required financial independence. Financial independence became impossible when salaries were withheld. Testifying about salary theft risked deportation. Seeking help from other sources became difficult due to controlled communication. Morale strengthening became difficult due to intentional isolation. Preserving health became impossible when health services were withheld. Long-term perseverance became impossible due to degrading living conditions and malnutrition.

This combination makes kafala particularly potent as a labor control tool. In contrast, slavery relies largely upon coercion, while debt bondage relies upon financial debts. Kafala relies upon a combination of physical, juridical, social, economic, medical, geographical, and discursive controls, which interact and reinforce one another, creating a system of total control within a private dwelling, intimately involving every aspect of a worker's existence and leaving no escape.

This result has implications for reform. Reforms focusing on a single mechanism like passport confiscation bans or minimum wage provisions are not effective when other control mechanisms remain. A woman who holds her passport but lacks wages, freedom of movement, communication, or health care access is still imprisoned. Similarly, a woman who enjoys communication but lacks documents, money, or geographic knowledge remains immobile. Thus, effective reform requires removing a plurality of mechanisms simultaneously, corresponding with the International Labour Organization, Regional Office for Arab States' (2017) recommendation that reform packages rather than incremental reform be pursued.

5.3 Strategies of Navigation, Resistance, and Survival

Research Question 2: What are the strategies used by migrant domestic workers to deal with, or resist the restrictions imposed by, the kafala system?

Whereas Section 6.2 described control processes prevalent in the kafala system, results for everyday resistance, supportive relationships, experiences of desperation and survival, and transformation through advocacy reveal that immobilization was not absolute. The study reveals that participants resisted their circumstances and developed methods for survival and escape.

5.3.1 Everyday Resistance: Strategic Compliance and Calculated Defiance

Evidence on everyday resistance shows many forms ranging from subtle non-compliance to outright confrontation. Such practices verify the idea of worker agency put forward by Puig-Ferriol Cabruja (2021), Fernandez (2021), and Fernandez et al. (2023). However, participants' responses show a level of complexity more planned out compared to "quiet acts" of resistance.

Anna's strategic compliance represents "performative submission," whereby she deliberately performed contentment to further strategic aims. After abuse and isolation, Anna explicitly formulated a strategy: "if I continue being in this situation with this man like this, I'm angry. He's angry. I show him that I'm angry with you and I know you're treating me badly. I will not be able to leave this house. So I changed. I changed and became very good at whatever he say, I do it." This illustrates strategic compliance as deliberate action. Anna chose submission to facilitate her exit. The plan worked and she was allowed outdoor access and her phone back. She then used the

opportunity to contact other African workers through TikTok to plan her exit and record videos of her sleeping conditions to send to the Kenyan office.

Anna's strategy represents what scholars have termed "everyday forms of resistance"—strategies that have all the appearance of compliance but serve to undermine domination. However, Anna's testimony reveals even more calculated strategic planning than this framework suggests. It is performance aimed at securing pre-determined objectives. The result extends Pande's (2012) idea of meso-level resistance and reveals individual-level performative acts employed before and in combination with meso-level actions. Anna's performative submission was Phase 1. Phase 2 took advantage of restored communication to contact other workers through social media. Phase 3 involved documenting abuse and reporting to authorities. Phase 4 involved coordinated escape using her TikTok network.

In addition to strategic compliance, participants exercised direct refusals expressing their rights and dignity. Anna refused to sign Arabic contracts she could not read: "I said, no, I cannot sign what I don't know. It's written in Arabic. You're telling me to sign. What am I signing?" This "documentary resistance" takes importance given obvious power asymmetries. Anna's refusal takes on importance in the context of obvious power asymmetries, since Anna was a recent arrival, detained, lacking papers and pay, and facing an angry employer and an irritated government official who accused her of "wasting their time."

Similarly, Hannah engaged in documentary and identity-based forms of resistance by refusing to become a domestic worker when recruited as a nurse. For eight months, Hannah was consistent in stating that she did not want to become a Kadama housemaid when recruited as a nurse. Despite the fact that she did not get the nursing job, Hannah's resistance challenged the attempt to deny her professional identity and transform it into a "domestic worker," regardless of her professional identity and employment preferences.

Kaya's resistance involved planning and utilizing opportunities that were presented. She hid a key, which she practiced utilizing when her employers were not around. Kaya also minimized detection by obstructing the line of sight of the cameras. Before embarking on her escape, Kaya fasted for seven days. The plan to escape was well thought out, as it had to be done when the employers were

away observing Friday prayers. Mira's resistance also involved planning, building trust, and carrying out a well-planned escape. Mira had access to the key that kept her passport, as her employer had given it to her. She only took her belongings, left the key next to her sleeping employer, and started working as a hospital cleaner, a job that had also been secretly arranged through another domestic worker.

These strategies—performative subordination, documentary refusal, identity assertion, surveillance evasion, timing, and trust subversion—demonstrate "tactical agency." Workers assessed their constraints, identified opportunities within those constraints, and adopted strategies specific to their situation. This problematizes passive reception of migrant domestic workers as victims waiting for external salvation critiqued in Pande (2012). Instead, participants are depicted as tactical agents constantly evaluating opportunities for dignity sustenance and escape. This echoes what Fernandez (2024) points out about Ethiopian MDWs carving out "counterpublics." Resistance played out on several levels: personal, group, and organizational, with people moving between these levels depending on what doors were open or closed to them.

5.3.2 Building Networks: Embassies, Allies, and Collective Solidarity

Research documenting how workers establish support through various channels confirms that many social networks formed as a result of systematic isolating conditions, described by Pande (2012) as meso-level resistance. Based on how employees describe network-building, employees appear to have greater control over efforts and employ wider arrays of methods than documented in earlier literature.

Embassy support turned out to be a lifeline. Kaya ran to the Nigerian embassy, which took her in immediately: "The embassy told me, calm down. You're here now, like this is your country. This is your home. Don't be afraid. You're safe." Just hearing "this is your country" and "this is your home" made a huge difference. Kafala takes away belonging; the embassy gave it back, both real shelter and a reminder that she still mattered. Ruth's case demonstrates embassy support extending to financial assistance for life-threatening medical emergencies. Ruth's employer refused to pay for necessary surgery despite seven years of service. The Philippine Embassy paid the entire hospital bill of $2,500 and got involved when complications required a second operation.

These results support Saravanamuttu's (2018) assertion that embassies play crucial protective roles, while demonstrating variation in capacity and responsiveness. Nigerian and Philippine embassies were quick to help and offered substantial support; Hannah discovered that Sierra Leone's diplomatic representation was only a consulate with limited capacity. Different embassy resource levels create different vulnerability levels among nationalities. Workers whose governments have well-resourced embassies access protection unavailable to workers from countries with limited diplomatic presence.

Workers also received assistance from unpredicted sources like neighbors or kind-hearted household members. Kaya's employer's driver brought her food and bought her a SIM card: "The driver was so nice, gave me a sim because he saw what they were doing to me. Sometimes we go out, buy me sandwich, say eat, eat." Valerie's employer's sister-in-law quietly slipped her food. At the recruitment agency, an Ethiopian worker advised Hannah: "Whenever he asks if you're ready to work, just say yes. I want you out of this office. This man is very wicked." Support from Lebanese employers' relatives, drivers, and other workers shows kafala's grip isn't total. Not everyone stood by and watched abuse happen. Some stepped in, shared food, snuck in phones, passed information, or offered advice. This complicates monolithic portrayals of Lebanese society as uniformly hostile, revealing instead differentiated responses from extreme abuse to active solidarity.

Although communication was significantly restricted, workers leveraged social media to form networks across borders. Anna connected to other African workers through TikTok: "So I joined TikTok. The moment he gave me my phone and I started looking for TikToks. People who work in Lebanon. Africans. So I saw girls taking outside... And I inboxed one girl." With this connection, Anna escaped: "Yeah, she sent a man, a taxi man... He's the one who came and helped me." Anna's testimony reveals social media creating new collective solidarity forms impossible in earlier eras. Social media platforms like TikTok enable visual identification of other domestic workers, direct messaging, information sharing, and coordination of practical assistance. This extends Fernandez's (2024) analysis of "migrant counterpublics" by revealing digital spaces enabling counterpublic formation even for workers still confined in employer households.

Together, these infrastructures index "transnational solidarity infrastructure" existing in the overlap between embassies, NGOs, online spaces, grassroots collectives, sympathetic individuals, and cross-border worker networks that exist despite kafala's efforts to keep individuals separated, demonstrating what Marchetti et al. (2021) identify as "intersectional activism."

5.3.3 Desperation, Breaking Points, and Transformation Through Advocacy

Though Sections 6.3.1 and 6.3.2 focus on resistance and network development, results regarding desperation and survival provide insight into the great psychological costs associated with kafala systems and circumstances where individuals nearly reached breaking points. This supports Zahreddine et al.'s (2014) work on psychiatric morbidity.

Ella considered suicide after sexual harassment and social isolation: "the mister, the middle of night, he come to my room. I scared, I want to talk with someone, what happen. that time, I'm, you're alone, alone. I think one day, I want to jump, I want to die, really." When Ella escaped to the agency, she was later returned to the same employer, showing lack of protection matching Yimer et al.'s (2025) claim: "Institutions reproduce rather than alleviate harm." Kaya similarly reached a point where self-harm was considered: "When I knew, I saw that I cannot contain it anymore. I was dying. There was a time, I wanted to mix flash. You know flash? I wanted to drink it." Kaya's consideration of ingesting bleach resulted from wage theft, medical neglect, and abuse which is what Zahreddine et al. (2014) refer to as "chronic stress and deprivation." Kaya's situation suggests about two years of work before this point of crisis, consistent with the average of 26 months, indicating 'a cumulative breaking point rather than an immediate adjustment response.'

These desperate situations demonstrate "existential violence" more than physical and economic exploitation because it attacks the basic human belief that life is worth living. When workers are deprived of agency and autonomy, disconnected from supportive social groups, subjected to sexual assault and systematic exploitation, unable to access legal remedies for these conditions, and placed in confinement with no possibility of release, some migrant workers reach a critical juncture at which death becomes preferable to continued existence. Such conditions also possess methodological significance for the study of migrant domestic workers. In the case of migrant workers such as Ella or Kaya, the possibility that the migrant workers could recount their experiences was dependent upon survival. Naomi's statement supports this: "Do you know they

kill some of them? They kill them… like the last one I saw, a girl jumped from… she went and hung on an electric pole. When [they] moved the car back, she got shocked. And after, the thing threw her down. She died instantly."

Crucially, all three women who expressed feelings of abandonment and/or suicide (Ella, Kaya, and Grace) not only survived but found new paths of advancement. They were able to withstand conditions designed to destabilize them.

Findings on transformation via advocacy show how several individuals transformed trauma into advocacy actions, using acquired knowledge to support other migrants and critique kafala. This might be seen as resistance's final stage, marked by a transition from survival to collective action. Hannah joined Concern Worldwide International, blending professional nursing experience and personal migrant experience. Kaya started an independent NGO named "Sister with a Strategy," aimed at helping migrants, single mothers, and female minors: "I have an NGO already now. We want to bring hope to them. We want to empower them. We want to bring transformation to their life." Kaya's work includes informing migrants about recruitment deceit, connecting workers to resources like IOM, and advocacy aiming to abolish kafala: "We are doing advocacy on this. Kafala should be abolished."

Ella organized support groups among different nationalities meeting monthly to discuss strategies for systemic change: "I have my own group. we are of different nationalities. Then we have another group, African and Asian. Every month we meet together. we discuss and we develop a constructive plan for the future." These advocacy activities are consistent with the idea propounded by Ramon Icart (2021) that the resistance of domestic workers is a contribution to the actualization of the Sustainable Development Goals. Specifically, the advocacy works of Hannah, Kaya, and Ella are consistent with the actualization of SDG 5: 'Gender Equality' via the actualization of SDG 8: 'Decent Work'. Indeed, the idea is consistent with the idea of 'Migrant Counterpublics' as propounded by Fernandez (2024). Notably, all three advocates experienced serious abuse yet transformed victimization into advocacy leadership, demonstrating resilience and political consciousness stemming from exploitation experiences. This challenges assumptions about advocacy needing outside organizers since these abused individuals firsthand proved most effective advocates due to their system knowledge.

5.3.4 Synthesis: From Tactical Resistance to Collective Transformation

From evidence synthesized on everyday resistance, networking, desperation, and advocacy, there is clear progression from individualized tactical resistance to networking and support, culminating in collective advocacy. While not linear, there is progression from individualized to collective to organizational levels. The progression illustrates how resistance promotes consciousness development. Workers who used tactical resistance to survive (Anna, Kaya, Mira) later created systems to assist other workers and ultimately became activists trying to change the system. Every resistance form led to new knowledge, contacts, and awareness.

This extends Marchetti et al.'s (2021) multi-level analysis by showing how individuals move between levels: being active in labor sector level (individual employment relations), organizational level (participating in NGOs), strategic action fields level (interacting with embassies, IOM, advocacy bodies), and interpretive frames level (challenging frames viewing domestic care as family issue rather than regulated sector). The synthesis reveals resistance costs. Workers reached breaking points before finding survival ways, implying many may not survive to resist. Those who became advocates did so after long exploitation periods. This challenges triumphant resistance portrayals because empowerment came only after years of exploitation, and only for those who survived conditions that broke many others.

Despite this, deterministic representations of kafala as totalizing are rendered dubious. Despite systemic immobilization, workers continually identified system contradictions, built relations despite enforced separation, staged escapes despite surveillance, and created organizational forms resisting kafala itself. This continued agency might be understood through dialectics of control and resistance, whereby each control system gives rise to resistance forms specific to that system's inherent vulnerabilities.

5.4 Reconceptualizing Freedom, Dignity, and Labor Relations

Research Question 3: How do lived experiences influence workers' notions of mobility, agency, and labor relations?

Whereas sections 6.2 and 6.3 examined how control and resistance were exercised, results on freedom as mobility and autonomy, and labor as dignity and respect indicate that these dynamics

promoted critical consciousness, creating new meanings concerning freedom, dignity, and labor relations developed through direct encounter with kafala's logic.

5.4.1 Freedom as Physical Mobility: Understanding Through Absence

Findings on freedom as mobility indicate participants understood freedom largely by its absence: the ability to move easily within space, make autonomous decisions regarding daily activities, and move through public space without fear. Such understanding emerges from immobilized experiences.

Kaya clearly connected freedom with bodily mobility and decision-making, comparing her second employer (where there was freedom) with her first (where Kaya was restricted): "Yes. I have my freedom. Okay. I go out, go and buy spinach, do whatever I want to do… If they treated me like this, there was no way I want to go out, run away. I was even praying not to leave this second one." Freedom for Kaya meant being able to go out, make purchases alone, and choose what to do which is exactly what she couldn't do in her first employment. While those able to move freely may define freedom through political engagement or independent thinking, workers systematically denied that ability view freedom as the fundamental right to physically leave premises, determine where to go without being monitored or restricted.

Anna expressed that restricting movement takes away basic human dignity: "I think that the domestic workers need freedom to express themselves... Or because me, you know, I'm vulnerable. I don't have that money. He bought me. You see, because for my case, they used to say, I'm a slave. He bought me." In Anna's eyes, ability to move and express herself freely was connected to being treated like a person instead of an object someone bought. Her employer's ownership statement made evident he had no intent to treat her as a free agent, creating a feeling that movement restriction was not only inconvenience but defining material representation of her status as purchased object, not free individual. Anna's story demonstrates how physical control transforms workers from human beings into objects owned by someone else.

Grace noted absence of legal status restricts workers' rights to move freely: "we don't have a personal freedom. So, around 9 o'clock, as we are coming, the police stop us." Workers face extreme fear of police detention while on public transport, resulting in "carceral geography" with

urban areas becoming detention places, transforming the city into pseudo-prison. Grace's testimony expands immobilisation concepts from locked doors to include government surveillance and policing that renders public space "unavailable." This is consistent with Block et al.'s (2023) work on bureaucratic dependency treating undocumented workers as "criminals," and Yimer et al.'s (2025) research on arbitrary imprisonment and deportation. "Freedom of movement" only had meaning when coupled with legal status meaning workers needed documentation in order for them to be in public space without fear.

Collectively, testimonies reveal "negative freedom" which is freedom defined not through positive capabilities (what one can do) but through absence of constraint (what one is not prevented from doing). For participants, freedom meant: not being locked inside; not requiring permission to go outside; not being surveilled during errands; not fearing police detention at night; not being owned by an employer. This negative definition emerged directly from systematic immobilization. When all positive freedoms were denied, freedom became defined by its most basic component: physical mobility without restriction. The finding reveals how immobility reshapes political consciousness. For participants, mobility became the prerequisite freedom enabling all others. Without ability to leave the house, workers could not access embassies, NGOs, police, hospitals, or other workers. Mobility enabled everything else; its denial foreclosed all possibilities.

5.4.2 Labor Relations as Ownership: Deconstructing Kafala's Logic

All study participants indicated through their discussions that they had made explicit critiques of kafala being a system of ownership, not employment. These critiques reflect high-level understanding of theoretical frameworks of labour relations within sponsorship systems.

Valerie directly named ownership as kafala's fundamental structure: "Because the problem in itself, it's kind of ownership. Like there you go buy a car or you buy a house. So you have the right to do anything and even your neighbor cannot question you. But don't forget we are talking about human beings here. By no means can you own a human being. You cannot. No matter how much you pay." Valerie draws an analogy: kafala treats workers the same way as vehicles or homes. Once someone has bought a vehicle or home, they can do anything without fear of someone questioning their decision. Valerie says, "we are talking about human beings here" not property; these are fundamentally different categories. The brilliance of Valerie's criticism is explaining that

kafala intentionally maintains blurring between the two while allowing legal fiction of being treated as an employee. The concept that "no matter how much you pay for a person, you can't actually own that person" stands in direct contrast to Kafala, which treats workers as financial investments, giving employers more rights over employees than would normally occur through employment relationships.

This analysis is consistent with Saravanamuttu's (2018) view on commodifying worker labour and personhood, and Fernandez's (2021) theory that kafala embodies racialised subjugation through legal means. However, Valerie's analysis was formed through direct experience of being treated as property, demonstrating how exploitation produces its own theory of critique.

Naomi connects kafala's governance structure to the refusal to provide basic needs. She states that employers "use them to work and work and work and work and we will not feed them," revealing that dignified labor relations require not only formal legal protections but also recognition of workers' fundamental human needs including food and rest.

Mira repeatedly used the phrase "slave modern" (modern slavery) to describe kafala: "This kafala system is like slave modern. New slave. It's a slave, but changing their name, like this, but all, everything who do in the house, you're slave, slave, slave." Mira's expression captures that modern kafala elements (contract, sponsorship, wage payment) didn't change its essential character as domination. The repetition "slave, slave, slave" emphasizes totality not just certain things or times, but "all, everything." Mira's reading deems liberal distinctions between slavery and wage labor based on payment or contract irrelevant. Control is the determining factor, and when employers control every life aspect (movement, communication, time, space, body), payment becomes secondary to the relationship's nature as ownership.

These testimonies, taken in aggregate, constitute "experiential jurisprudence": theoretical explorations of labor relations nature from workers' perspective, based upon lived exploitation experience. Participants weren't simply narrating exploitation; they were reflecting upon underlying exploitation logic, ownership's role in that logic, and underlying principles challenging kafala's theoretical legitimacy. This analysis expands academic discourses surrounding 'kafala' (Fernandez, 2021; Saravanamuttu, 2018; Pande, 2013), showing migrant workers develop

complex system understandings. Results contradict the paternalistic idea that migrant workers rely upon external experts to express their exploitation; rather, workers experiencing exploitation develop the most accurate understanding of its logic.

5.4.3 Synthesis: Exploitation as Generator of Critical Consciousness

Results on freedom as mobility and labor as dignity showed that control mechanisms inherent in sponsorship paradoxically produced theories on freedom, dignity, and labor relations. Those participants who felt a sense of immobilization had an understanding of the preconditions for freedom, while participants who felt as though they have been treated as property had an understanding of property relations, and participants who felt as though they had been deprived of dignity had an understanding of equality among humans. This is an example of Fernandez's (2024) "migrant counterpublics," where the experiences and discourses among migrants counteract the mainstream discourses on migrants and migration.

However, data reveal counterpublic discourses transcend opposition to be productive discourses in their own right. Workers created discourses that don't simply counterpose current labor relations but created new ideas of how these relations could be. Valerie's claim that human beings cannot be owned; Kaya's idea of freedom in terms of routine mobility; Mira's description of the sponsorship system as slavery; Naomi's articulation of basic human needs. These represent not merely critiques but alternative visions.

The finding corroborates Marchetti et al.'s (2021) observation that domestic workers' organization combines practical concerns articulation with counter-hegemonic interpretive frameworks articulation. Participants oscillate between practical and theoretical concerns: demanding wages while challenging ownership logic, seeking freedom of movement while theorizing the right to freedom, and pursuing liberation from employers while naming kafala as slavery. Such oscillation between practice and theory demonstrates how participants became theorists through their exploitation experiences, developing analyses that remain linked with their lived struggle experiences. While not conventional theorists, participants became theorists through exploitation experiences, resulting in theories arguably more accurate than academics' because of their basis on real-world system operations knowledge.

The implication is that reform and advocacy strategies must sufficiently engage with workers' analyses rather than imposing external approaches. Valerie's claim that "by no means can you own a human being" is not an argument demanding expert analysis but rather a theoretical claim needing to inform reform strategies. Similarly, Mira's description of Kafala as "slave modern" is not an argument demanding moderation but rather accurate description needing to inform abolitionist strategies. Where participants describe freedom in terms of mobility, this is not implication of limited consciousness but rather understanding of conditions providing for other freedoms' possibility.

5.5 Theoretical Contributions and Implications

5.5.1 Compound Immobilization: Theorizing Kafala's Architecture

The present research makes a theoretical contribution by developing "compound immobilization," understood as concurrent deployment of physical, social, economic, medical, and communicative control mechanisms that confine workers into exploitative situations. This builds upon Fernandez's (2021) "diffused coercion" by identifying exact mechanisms through which coercion takes place.

Existing literature has identified individual mechanisms: passport confiscation (Saravanamuttu, 2018; ILO, 2016b), wage theft (Chammartin, 2004), communication restriction (ILO, 2016a), physical confinement (Bechtold et al., 2022), and medical neglect (Zahreddine et al., 2014). These mechanisms are commonly studied in isolation or additive combinations (worker experiences A + B + C). Compound immobilization suggests mechanisms are concurrent and constitutive of one another and that each mechanism requires others to function effectively.

Implications for reform follow. If individual mechanisms are targeted by reform measures (passport confiscation prohibition or minimum wage setting) such measures are unlikely to bear fruit as long as other concurrent mechanisms remain. A migrant worker may have the passport but lack wage payments, legal geographic mobility, communication access, or medical attention access. Similarly, a migrant worker may have minimum wage access but lack passport access, geographic mobility, or residence access. Hence, reform needs to address individual mechanisms concurrently, in accordance with the International Labour Organization, Regional Office for Arab States (2017) recommendation that comprehensive reform packages rather than incremental reforms be pursued.

5.5.2 Tactical Agency: Rethinking Resistance Under Constraint

The second theoretical contribution is tactical agency: workers' capacity to assess constraints they face, identify opportunities in constraints, and develop strategies appropriate to their situations. This concept refutes the binary concept that workers are either passive victims or heroic resisters, instead revealing agency as tactical, strategic, and contextual.

Previous literature has documented forms of everyday resistance by workers under constraint. However, participants' accounts reveal even more calculated forms of resistance than everyday resistance frameworks suggest. While Anna's submission was strategic planning with set objectives (re-gaining telephone access, outdoor access, escaping), Kaya's escape wasn't impulsive but resulted from careful extended planning, including strategic concealment and careful execution. Mira's document retrieval attempted leveraging trust established over extended time.

Tactical agency refers to a concept distinct from everyday spontaneous acts and organized collective action. Tactical agency is the space existing in extreme constraints' midst, as individuals strategize, execute strategic performances, and exploit systemic weaknesses creating survival and escape opportunities. This explains the rationale behind Section 6.3 progression, where the move from individualized tactics approaches to collective approaches can be seen. Individuals began using tactical agency to control their own situations. Once they left their employers, they utilized individually developed agency to assist other workers by creating networks. Once they developed collective agency, they utilized it organizationally by creating NGOs.

5.5.3 Experiential Jurisprudence: Workers as Theorists

The third theoretical contribution proposes experiential jurisprudence: workers' theoretical labor relations analysis stemming from confronting exploitation. This notion challenges the hierarchy between academic theory and experiential knowledge, recognizing that those who experience exploitation often develop the clearest understanding of its nature and operations.

Previous studies usually portray academic researchers as theorists understanding and explaining workers' experiences (Fernandez, 2021; Pande, 2013; Marchetti et al., 2021). However, participants' testimonies portray workers as theorists understanding and explaining their own experiences. Valerie explained "by no means can you own a human being, no matter how much

you pay," questioning kafala's core. Mira defined kafala as "slave modern," where slavery endured despite terminology evolution. Kaya conceptualized freedom through the absence of restriction rather than the presence of rights. Naomi articulated how dignified labor requires workers' fundamental human needs recognition alongside legal protections.

These analyses constitute theoretical contributions rather than derivative academic theories. They begin from different epistemological base than academic theories (through lived experience rather than scholarly inquiry), however both provide equal or greater precision level concerning system practical functioning. Experiential jurisprudence refers to this way of developing theory; it is produced through lived experience and expressed through testimony, resulting in the generation of legal principles and ideas that provide insight into the logic and conceptual basis of the exploitation process.

In research methodology, it's recommended that researchers don't take participants' experiential knowledge and turn it into academic theory, but instead recognize participants as developing their own theories. Participants' analyses shouldn't be seen as data requiring researcher interpretation, but as authoritative theoretical contributions deserving respect and wider audience availability. Research methodologies that center participants' voices recognize that participants' analyses should be treated as theoretical contributions rather than raw data requiring academic interpretation, challenging existing hierarchies between academic knowledge and experiential knowledge and recognizing that workers experiencing exploitation develop the most accurate understanding of its logic.

5.5.4 Situating Lebanese Kafala and Mobility Studies Implications

Results corroborate most kafala aspects observed elsewhere in the Gulf while providing critical Lebanon-specific information. Similar to Gulf counterparts, Lebanon implemented kafala through employer sponsorship, passport confiscation and labor law exclusion (Saravanamuttu, 2018); however, Lebanon's unique context contains key Gulf neighbors differences: relatively weak police and state agencies capacity; increased third party recruitment agencies dependency; lack of affluent welfare benefits; and economic and political crisis dramatically increasing workers' vulnerability (Block et al., 2024).

Multiple Lebanese context crises create compounded immobilization environment. In the line of crises that included the financial crisis of 2019, the pandemic caused by Covid-19, the explosion in the port of Beirut in 2020, and the war of 2023–2024, workers were driven further into the clutches of the Kafala system and rampant inflation, which ate into their wages and left employers abandoning workers or making them retreat at home (Block et al. 2024; Sensenig 2025). For all their differences, a core pattern defines Lebanese and Gulf kafala alike: employers sponsor workers, generating a dependency that legally excludes domestic workers from basic labor protections and entangles them in a racialized hierarchy where certain nationalities are taken as more exploitable than others (Fernandez, 2021; Yimer et al., 2025).

The research contributes to the study of mobility by revealing the actively produced immobility that is induced by various legal, spatial, social, economic, and communicative mechanisms. The research results highlight the significance of infrastructure and power relations that facilitate movement in the study of mobility. The term compound immobilization is used to refer to the combination of various mechanisms that produce immobilization. This suggests that immobility is not a deficit but rather the result of its continuous enforcement.The research results have implications for carceral geography, particularly in relation to the organization of confining spaces.Participants expressed restriction to physical locations within buildings, but also indicated entire city functioned as carceral space where arrest fear for deportation limited free movement ability. Findings indicate freedom of movement and other personal freedom aspects relationship. Most participants don't see freedom of movement as one freedom category among many; they consider it necessary condition for accessing all other freedom types.

5.6 Limitations and Future Research

This study has several limitations. Small sample size (10) restricts statistical generalizability; however, this allows qualitative analysis depth. Since all participants were female workers who fled their live-in jobs in Lebanon, research didn't consider experiences of those still confined or who died while employed. The study relied on retrospective accounts rather than actual observations. Lebanon-specific focus may limit applicability to other kafala contexts. All participants were recruited through Insaaf Lebanon, potentially selecting workers with better support networks access.

In addition to that, as a Lebanese researcher with prior experience working with migrant domestic workers, my positionality is inevitably a factor in my data collection and analysis. In the process of analysis, reflexive techniques such as journaling and memoing were used to ensure that the participant remained at the core of the analysis while being aware of my role in the construction of knowledge. This is due to the inherently relational and co-constructed nature of interview data. As such, the results not only show the interaction between the researcher and the participants but also the participants' own experiences. The emotional nature of the interview process, even though conducted in an ethical manner, could have impacted the participants' willingness to share certain experiences, some of which could have been painful to share.

These findings point to several further study avenues. Comparative work across kafala contexts could clarify regionally consistent versus context-specific findings. Longitudinal research through various phases might shed light on tactical agency development. Research examining still-confined workers could complement this escape-focused study. Examining employer perspectives could provide demand side insights. Comparative organizing research could clarify effective strategies. Research on children born to migrant domestic workers could extend intergenerational immobilization analysis (Block et al., 2024).

5.7 Conclusion

The current study's findings on kafala, domestic labour and migration have been placed in previous scholarship context to produce three theory contributions: compound immobilisation, tactical agency and experiential jurisprudence. Through kafala analysis, it was evident that it functions through interconnected and reinforcing control forms including physical, social, economic, medical and communicative control which are able to continue keeping workers in exploitation state. Although workers are systematically immobilised through different control forms, workers continue exercising tactical agency in assessing constraints, identifying opportunities and devising survival, escape and ultimately collective organizing strategies.

Significantly, participants' testimonies indicate exploitation generates not only trauma but also underlying theoretical framework insight. Workers developed sophisticated kafala logic analyses and developed principles (humans cannot be owned; there is no freedom without mobility; slavery continues existing despite terminology changes; dignified work must include fundamental human

need acknowledgement) that might inform reform efforts. Workers-produced analyses represent experiential jurisprudence; they can be viewed as lived experience-produced theory, with same depth degree as academia-produced analysis, but contain moral authority that cannot be provided to outside situation observers.

Public policy and practice implications are obvious: to achieve meaningful reform, we need comprehensive approach to dismantle compound immobilization multiple mechanisms at once (rather than piecemeal fashion); we need to amplify workers' organizing efforts, which are often based on their own theoretical insights; and we should allow these theoretical insights to drive reform priorities as opposed to translating/moderating workers' insights through "expert" lens in another form.

Chapter 6
Conclusion

6.1 Restatement of Research Purpose

The aim of the current study is to investigate how migrant domestic workers perceive, negotiate, and subvert the kafala system in Lebanon, with particular emphasis on the processes of immobilization and the stratefies that facilitate agency. Although prior literature analyzed the exploitative dimensions of the kafala system and the violations of human rights, insufficient studies focus on the workers' voices in articulating their perceptions of their confinement, how they act to subvert it, and how these experiences influence their meanings of freedom, dignity, and the right to work.

Guided by these three key questions, this research aims to explore the ways in which the workers interact with the control mechanisms embodied in the kafala system in the recruitment and employment phases, the coping and navigation strategies the workers use in the midst of these severe constraints, and the role of the workers' lived experiences in the construction of their understanding of mobility, agency, and labor relations. This research uses in-depth interviews with ten migrant domestic workers from Kenya, Nigeria, Sierra Leone, the Philippines, Madagascar, and Sri Lanka to explore the process of structural violence in the kafala system and the development of the workers' critical consciousness and collective action.

As a Lebanese researcher with prior experience in working with migrant domestic workers, my own positionality was a factor in the process of data collection and interpretation. The theoretical constructs developed in this thesis were the result of an iterative process in which the existing research on the topic (Fernandez, 2021; Block et al., 2023; Marchetti et al., 2021) provided broad sensitizing concepts, and the initial findings of the research highlighted the language and experiences of the participants. The mechanisms and, in particular, the interaction of these mechanisms were the result of the experiences of the participants themselves.

6.2 Summary of Key Findings

Mechanisms of Control: Compound Immobilization

The initial research question that this particular study set out to answer was to explore the workers' engagement with the kafala system. The findings of the study showed that the kafala system is facilitated through various mechanisms that work together simultaneously to confine the workers within exploitative conditions, which can be described as "compound immobilization."

The workers were deceived from the very beginning of the recruitment process. For instance, Hannah, one of the participants, was hired to work as a nurse, but when she arrived, she was deployed to work as a domestic worker. Another participant, Anna, was promised a salary of $300 per month, while she was only paid $200. The workers were also required to pay a huge recruitment fee of $2,000 or more, which was based on deception. The passports of the workers were immediately confiscated at the Beirut airport.

These physical confinements included locked doors, deprivation of days off, prohibition from leaving the house, disorientation, and language barriers. The workers were confined physically despite the doors being open due to the confiscation of identification materials, unfamiliarity with the place, and inability to speak Arabic. Ruth was confined in her employer's house for four years. Valerie was confined every time her employer left the house.

Poor living conditions further emphasized the subhuman nature of the workers. Ruth was forced to live on a balcony for seven years, while Anna was confined in a storage room next to a generator and electrical equipment. Valerie was deliberately starved, given half a piece of bread per meal, and ordered to lose weight. All these factors showed that the workers were considered subhuman.

Economic exploitation took several related forms: the non-payment of wages (such as the non-payment of wages owed to Hannah for eight months), high kafala release fees (demanded from Ruth and Kaya in the range of $3,000 to $5,000), deception regarding wages, and theft by agents. Medical neglect forced workers to deal with illness without medical treatment. Control of communication disconnected workers from their support networks by confiscating phones and monitoring communications.

These control mechanisms are constitutive in the sense that workers could not escape without documents, could not obtain documents without the complicity of the employer, could not require complicity without economic independence, could not attain independence without the payment of wages, and could not report abuse without risking deportation. The simultaneity and interrelatedness of these control mechanisms are also why reforms addressing individual problems have little impact on improving the situation of workers.

Strategies of Resistance: Tactical Agency and Network-Building

The second research question explores the ways in which workers navigate and resist their working conditions. The results show sophisticated strategies that the study terms “tactical agency,” or the workers' intentional response to very limiting circumstances.

Everyday resistance included strategic compliance that provided opportunities for escape (such as when Anna changed her behavior in order to access her phone again); refusal to sign contracts that were not in a language they could understand; documentation of abuse; disabling the surveillance (such as when Kaya covered the cameras); and the timing of escape, as a strategic decision (such as when Kaya escaped on a Friday, when the concierge was at prayers).

The construction of networks was identified as an important factor for survival and evasion. Safe havens were created through the work of diplomats, such as the Nigerian embassy, which offered immediate refuge for Kaya, and the Philippine Embassy, which paid for Ruth’s $2,500 surgical costs after her employer refused to do so. Also, sympathetic persons were identified, such as the driver of Kaya’s employer, who bought her a SIM card and sandwiches. Through social media, connections were made, such as when Anna found African workers on TikTok, who arranged for her to be picked up by a taxi to aid her escape.

The cost of resistance was found to be high. Ella considered harming herself by jumping off a building after being subjected to sexual harassment, while Kaya considered drinking bleach after deciding she could no longer endure the situation.These acts of desperation are a measure of the psychological violence migrant workers are exposed to, which is consistent with the research done by Zahreddine et al. (2014) that established migrant workers suffer from psychiatric morbidity.

Transformation through advocacy was a clear demonstration of the workers' refusal to remain victims. Hannah found work with Concern Worldwide International. Kaya started "Sister with a Strategy," which is an NGO focused on community, single mothers, and girl children. Ella developed cross-national solidarity networks, which meet once a month to discuss and strategize about the future.

Reconceptualizing Freedom and Labor Relations: Experiential Jurisprudence

The third research question of this study examined how workers' experiences influenced their perceptions of mobility, agency, and labor relationships. In this regard, the study findings established the existence of what this study refers to as "experiential jurisprudence," where workers theoretically analyze their experiences with considerable analytical precision.

Freedom as Mobility and Autonomy: Experiential immobilization encouraged workers to conceptualize freedom as an inherent component of physical movement and autonomy in decision-making processes. Kaya asserted, "I have my freedom. Okay. I go out, go and buy spinach, do whatever I want to do." Freedom, therefore, meant workers who were confined could walk outdoors, choose where they wanted to go, and move freely in public space without fear of persecution. In this respect, Anna asserted how confinement from movement meant workers lost basic human dignity, as they needed freedom of expression, as in her case, they were described as slaves: "He bought me."

Labor as Dignity and Respect: The workers explicitly critiqued the ownership structure that is implicit under the kafala. Valerie challenged the basic assumption of the kafala: "By no means can you own a human being. You cannot. No matter how much you pay." Mira repeatedly used the term "slave modern" to describe the kafala: "This kafala system is like slave modern… it's a slave, but changing their name, like this, but all, everything who do in the house, you're slave, slave, slave."

The workers offered an alternative vision that is based on respect for each other as human beings, human dignity, and the basic assumption that human beings cannot be owned, regardless of the financial compensation that is provided. The workers recognized that to achieve dignified labor relations, there is a need to respect domestic work as legitimate labor that is worth protecting, to

pay wages that are actually received, to allow for freedom of movement, to provide healthcare, to pay for days off, to allow for communication with the family, and to respect the workers as human beings rather than property.

6.3 Theoretical and Empirical Contributions

Theoretical Contributions

This study makes three primary theoretical contributions to scholarship on the kafala system, labor migration, and migrant workers' rights.

First, compound immobilization specifies how multiple mechanisms of control operate simultaneously and constitutively under kafala, clarifying why piecemeal reforms fail. Rather than treating passport confiscation, wage theft, confinement, and communication control as separate abuses, this framework demonstrates how these mechanisms work together to create inescapable conditions. This conceptualization advances scholarship by explaining the systemic nature of kafala's control and the necessity of comprehensive rather than incremental reform, extending Fernandez's (2021) concept of "diffused coercion."

Second, tactical agency provides a theory of how to study workers' conscious strategizing in the face of severe constraint, thus transcending the binary of victims/resisters. In this regard, the concept of tactical agency captures the strategic performance, long-range planning, coordination, and progression from individual to collective action of workers. Tactical agency thus recognizes the co-occurrence of agency and severe constraint, as workers are simultaneously constrained and strategizing. This is an advancement in theory, which helps to better understand agency in the face of extreme structural violence, an extension of Pande's (2012) study of resistance on the meso-level.

Third, experiential jurisprudence affirms that workers' theoretical analysis has an equivalent status to academic theory, thus undermining the dichotomy between theory production and lived experience. In this study, workers' analysis has been found to be complex and sophisticated; they analyze kafala as an institution that establishes ownership, term it 'modern slavery' under new nomenclature, understand freedom as movement, and develop principles for dignified labor

relations. In this way, workers' analysis under the rubric of 'experiential jurisprudence' places workers not as 'research participants' to be studied and analyzed but as theorists whose analysis has both analytic and moral weight.

Empirical Contributions

Empirically, the study contributes a rich documentation of the kafala system in Lebanon based on the testimony of the workers and includes the following:

- Documentation of the institutionalized confiscation of passports at the Beirut International Airport.
- Documentation of the compound immobilization through a rich description of the various mechanisms that immobilize the workers simultaneously.
- Evidence of the trace from the individual strategies to the collective formation and finally to the collective leadership.
- Documentation of the psychological impact, including suicidal tendencies and consideration of self-harm, coupled with resistance.
- Evidence of the workers' understanding of freedom, dignity, and their rights as workers.

The study examines how the build-up of crises in Lebanon, from the 2019 financial meltdown, the COVID-19 pandemic, the 2020 explosion, and the 2023-2024 war, has increased vulnerability in the country. This helps to create a more complete picture of kafala in the context of crises, which is relevant to the support of migrant workers in such circumstances (Block et al., 2024; Sensenig, 2025).

6.4 Implications for Policy and Practice

Policy Implications

The literature on the compound immobilization process shows that dealing with individual issues in a piecemeal fashion does not achieve any meaningful reform. For example, while it might be useful to prohibit passport confiscation, it will not be effective in the face of wage theft, illegal status, and communication suppression because workers can still be exploited through different

channels. Meaningful reform, as recommended by the ILO Regional Office for Arab States (2017), entails the following:

Eliminating the kafala system in favor of work permits for workers; allowing workers to change jobs without needing a sponsorship; maintaining legal status irrespective of employment; and allowing access to legal channels without deportation concerns.

Extending comprehensive labor law protection to domestic workers, which includes minimum wage protection, regulation of working hours, provision of rest days, occupational safety, and social security protection, remains a necessity. This exclusion, as provided in Article 7, creates a legal vulnerability that promotes exploitation.

Criminilization of passport confiscation, with effective sanctions against employers, airport authorities, and agencies, is necessary, especially considering that confiscation happens at Beirut airport, which indicates a level of complicity.

Establishing accessible justice mechanisms that include provisions such as the availability of multiple languages, free legal assistance, protection against deportation when filing complaints, and a reversal of the burden of proof against employers will address the justice barriers as identified by Yimer et al. (2025).

Granting citizenship to children born in Lebanon to migrant women which addresses the issue of statelessness, as identified by Block et al. (2024), as well as Fernandez et al. (2023).

Protecting workers' freedom of association rights which involves the recognition of unions of domestic workers and the protection of workers from deportation on grounds of association. Most importantly, reforms should be in line with collaborative approaches between governments, ILO, and workers, as evidenced by experiences in Ecuador, Brazil, and the Philippines, as opposed to top-down ratification without worker engagement (Marchetti et al., 2021). The experiential jurisprudence of workers should be used as a guide for reform.

Practice Implications

For organizations working with migrant workers, research has shown that individuals who require support have generally used complex survival strategies. Contrary to the view of migrant workers as passive agents awaiting rescue, support work should focus on building the agency of migrant workers and utilizing their social networks. The prompt response of the Nigerian embassy to provide assistance to Kaya and the provision of funding for Ruth's surgery by the Philippine embassy are examples of support work.

The subsequent discovery of increased psychological distress and sustained agency suggests a trauma-informed approach to support work, which considers the psychological distress and sustained agency of migrant workers. Support work should address material needs while also providing opportunities for workers to build social networks, analyses, and organizational work.

6.5 Limitations

There are several limitations that impact the breadth of this research. The sample size, ten participants, offers a richness in data but limits its ability to be generalized. The sample is also limited in that all participants were women who stayed in Lebanon after escaping exploitative employers. As a result, this research does not include workers who are currently confined, workers who completed their contracts, or workers who died in Lebanon. This creates a survivor bias in which workers who were able to escape and access a support network are included in this research. Methodologically, this research is a retrospective analysis in which workers may be influenced by current circumstances and cognitive processes. Additionally, this research is a snapshot in time rather than a longitudinal analysis. The participants were recruited through Insaaf Lebanon, which may result in workers who have a broader or more well-developed support network.

As a Lebanese researcher with prior experience in casework, I argue that my positionality has affected the disclosures made by the participants. My insider position may have helped me achieve ease and rapport with the participants, but at the same time, it has created a complex configuration of power relations. Journaling and memo-writing have been integral parts of the analysis, with the purpose of preserving the participants' "voices" at the center of the analysis. The fact that interviews are a relational and co-constructed dialogue means that the findings are not only a product of the dialogue between the researcher and the participants but are also shaped by the

participants' unique experiences. The fact that the interviews were emotionally charged, although within ethical boundaries, may have affected the disclosures made by the participants, as the experiences may have been too painful for the participants to express, even within a supportive environment.

In terms of temporality, interviews conducted amidst the compounding crises (2024-2025) have revealed experiences influenced by unusual circumstances. In terms of geography, the unique context of Lebanon, marked by a weak state and sectarian citizenship laws, adds specificities to the findings which limit their direct applicability to other countries with a Kafala system.

6.6 Recommendations for Future Research

Building on this study's findings, several directions would advance understanding:

Comparative research on kafala systems that explores the ways in which state capacity and legal differences affect compound immobilization mechanisms would help to clarify whether the patterns identified here are representative of kafala systems generally.

Longitudinal research would also allow for an understanding of workers' migration phases that would not be captured by a cross-section approach and would reveal how workers' tactical agency evolves over time and how they move from individual survival to collective action.

Research with confined workers using anonymous digital surveys or embassy partnerships could address this study's survivor bias by capturing experiences of those currently trapped.

Employer research investigating perspectives and decision-making could inform demand-side interventions and reveal how employers rationalize exploitation.

Children research examining experiences of children born to migrant domestic workers would extend understanding of intergenerational immobilization documented by Block et al. (2024) and Fernandez et al. (2023).

Policy implementation research tracking how reforms are enacted and how workers experience changes would provide crucial feedback for reform efforts.

Organizing research comparing domestic workers' movements across contexts would illuminate factors enabling successful collective action under constraint.

6.7 Final Reflections

In this study, the kafala system is identified as an overarching system of governance that uses multiple forms of control, or compound immobilization. However, as revealed in this analysis, the overall system of control under the kafala system is imperfect, as workers consistently display agency in their quotidian forms of resistance, build essential networks, and transform their traumas into advocacy. Most significantly, the lived experiences of workers lead to critical consciousness, which is both analytically and morally powerful.

Immobilization causes workers to conceive of freedom as inherently tied to physical mobility and decision-making autonomy. On the other hand, experiences of exploitation encourage a nuanced critique of the kafala system that conceives of it as producing relations of ownership rather than employment. There are also explicit conceptions of labor relations that are based upon notions of mutual respect and human dignity.

These observations, which have been referred to as experiential jurisprudence, represent a high level of theoretical analysis that should inform any reform efforts. The recommended course of action recognizes workers' pre-existing agency, expertise, and organizational capabilities. Reform should not be externally imposed but rather emerge from workers' own analysis.

Tens of thousands of workers are under a system of kafala in Lebanon, with hundreds of thousands affected across the Arab States. All of these workers suffer from a process of compound immobilization; all of these workers have developed tactical agency; and all of these workers have the potential to make a difference in social change. This study seeks to honor those workers who have survived and those workers who have experienced fatal outcomes by examining the process of compound immobilization, the acts of resistance used by workers within these systems of constraint, and what workers see as necessary to achieve justice.

The final word belongs to participants:

Valerie: "By no means can you own a human being. You cannot. No matter how much you pay."

Kaya: "We want to bring hope to them. We want to empower them. We want to bring transformation to their life."

Ella: "We want to share, maybe, after me comes someone. They know what we do, what we've done, and they can continue."

These voices speaking for dignity, naming exploitation, building solidarity, and envisioning transformation speak to a set of labor relations based on mutual respect rather than ownership. The appropriate task for researchers, advocates, and policymakers is to amplify these voices, support these struggles, and advance this vision for a world where people cannot be owned, where freedom means autonomous mobility, where domestic work is recognized as work worthy of protection, and where dignity is understood as a workers' right rather than a prerogative bestowed by the employer.

The path from exploitation to justice has already begun. Workers are already organizing, theorizing, and asserting demands for transformation. This research joins workers' voices: no more kafala, no more modern slavery, and no more ownership of human beings.

References:

Amnesty International. (2019). *Their house is my prison: Exploitation of domestic workers in Lebanon*. Amnesty International.

Asiimwe, F. M., & Musinguzi, D. (2024). Analysis of push and pull factors influencing the migration of Ugandan domestic workers to Saudi Arabia. *Interdisciplinary Journal of Sociality Studies*, *4*, 1–19. https://doi.org/10.38140/ijss-2024.vol4.01

Beaugrand, C., & Thiollet, H. (2023). Migration intermediation: Revisiting the kafala (sponsorship system) in the Gulf. In A. Pécoud & H. Thiollet (Eds.), *Research handbook on the institutions of global migration governance* (pp. 341–356). Edward Elgar Publishing. https://doi.org/10.4337/9781789908077.00032

Bechtold, H., Chaya, C., Maydaa, C., Kofman, E., Tuncer, E., & Lazzarino, R. (2022). *Gendered dynamics of international labour migration: Migrant women in Greater Beirut, Lebanon*. The Gender, Justice and Security Hub. https://doi.org/10.13140/RG.2.2.25110.01600

Block, K., Fernandez, B., McGee, T., Al-Barazi, Z., & Brennan, D. (2023). Immobilisation of migrant domestic worker women and their children born in Lebanon. *Journal of Ethnic and Migration Studies*, *50*(8), 1923–1940. https://doi.org/10.1080/1369183X.2023.2245153

Chammartin, G. M.-F. (2004). Women migrant workers' protection in Arab League states. In S. Esim & M. Smith (Eds.), *Gender and migration in Arab states: The case of domestic workers* (pp. 8–24). International Labour Organization, Regional Office for Arab States.

Destremau, B. (2007). *The dynamics of the globalised migrant domestic labour market in the Mediterranean countries* [Conference paper]. Mobilities Conference, Amsterdam School for Social-Science Research (ASSR), Amsterdam, Netherlands. hal-00637705

Destremau, B. (2007). *Women domestic workers in the Arab States: Discourses and policies*. International Labour Organization.

Edwards, R., & Holland, J. (2013). What is qualitative interviewing? Bloomsbury Academic.

Fakih, A., & Marrouch, W. (2014). Who hires foreign domestic workers? Evidence from Lebanon. *The Journal of Developing Areas*, *48*(3), 339–352. https://www.jstor.org/stable/24241242

Fernandez, B. (2021). Racialised institutional humiliation through the Kafala. *Journal of Ethnic and Migration Studies*, *47*(19), 4344–4361. https://doi.org/10.1080/1369183X.2021.1876555

Fernandez, B. (2024). Engendering migrant counterpublics: Fun, care, solidarity, and resistance among Ethiopian domestic workers in Lebanon. *Gender & Development*, *32*(1–2), 159–176. https://doi.org/10.1080/13552074.2024.2348392

Fernandez, B., McGee, T., Albarazi, Z., Brennan, D., & Block, K. (2023). At risk of statelessness: Children born in Lebanon to migrant domestic workers. *International Migration Review*, *59*(1), 502–528. https://doi.org/10.1177/01979183231186794

Fraser, N. (1990). Rethinking the public sphere: A contribution to the critique of actually existing democracy. *Social Text*, *25/26*, 56–80.

Gallotti, M. (2015). *Migrant domestic workers across the world: Global and regional estimates*. International Labour Organization, Labour Migration Branch. https://www.ilo.org/global/publications

Ghaddar, A., Khandaqji, S., & Ghattas, J. (2020). Justifying abuse of women migrant domestic workers in Lebanon: The opinion of recruitment agencies. *Gaceta Sanitaria*, *34*(5), 493–499. https://doi.org/10.1016/j.gaceta.2018.11.001

Human Rights Watch. (2010, September 16). *Lebanon: Judiciary failing to protect domestic workers*. https://www.hrw.org/news/2010/09/16/lebanon-judiciary-failing-protect-domestic-workers

International Labour Organization, Regional Office for Arab States. (2017). *Employer–migrant worker relationships in the Middle East: Exploring scope for internal labour market mobility and fair migration* (White paper). International Labour Organization.

International Labour Organization. (2009). *Decent work for domestic workers*. ILO.

International Labour Organization. (2014). *Tricked and trapped: Human trafficking in the Middle East*. ILO Regional Office for Arab States.

International Labour Organization. (2015). *ILO global estimates on migrant workers*. ILO.

International Labour Organization. (2016). *Live-in domestic workers: A global profile*. ILO.

International Labour Organization. (2020a). *Impact of COVID-19 on migrant workers in Lebanon*. ILO.

International Labour Organization. (2020b). *The Kafala system and child domestic work*. ILO.

International Organization for Migration. (2021). *Migration governance snapshot: Lebanon*. IOM.

Jureidini, R. (2004). Women migrant domestic workers in Lebanon. In S. Esim & M. Smith (Eds.), *Gender and migration in Arab states: The case of domestic workers* (pp. 64–85). International Labour Organization.

Khan, A., & Harroff-Tavel, H. (2011). Reforming the Kafala: Challenges and opportunities in moving forward. *Asian and Pacific Migration Journal*, *20*(3–4), 293–313. https://doi.org/10.1177/011719681102000303

Kuzbari, N. (2018). *Domestic work in Lebanon: What are some of the main factors that contribute to the continued exploitation of women migrant domestic workers in Lebanon?* Institute for Women's Studies in the Arab World, Lebanese American University.

Liloia, A. (2023). *Barriers to women's workforce participation in the Gulf Arab States*. Arab Center Washington DC. https://arabcenterdc.org/resource/barriers-to-womens-workforce-participation-in-the-gulf-arab-states/

Mansour-Ille, D., & Hendow, M. (2018). From exclusion to resistance: Migrant domestic workers and the evolution of agency in Lebanon. *Journal of Immigrant & Refugee Studies*, *16*(4), 449–469.

Marchetti, S., Cherubini, D., & Garofalo Geymonat, G. (2021). *Global domestic workers: Intersectional inequalities and struggles for rights*. Bristol University Press. https://creativecommons.org/licenses/by-nc/4.0/

Mehzer, Z., Nassif, G., & Wilson, C. (2021). *Migrant workers' rights are women's rights: Women migrant domestic workers in Lebanon: A gender perspective*. UN Women. https://www.unwomen.org/en/digital-library/publications/2021/06/migrant-workers-rights-are-womens-rights

Mora, C., & Piper, N. (2021). Feminization of migration. In *Handbook of migration crises* (pp. 340–354). Edward Elgar Publishing.

Odeku, K. O. (2014). An overview of domestic work phenomenon. *Mediterranean Journal of Social Sciences*, *5*(9), 697–703. https://doi.org/10.5901/mjss.2014.v5n9p697

Pande, A. (2012). From "balcony talk" and "practical prayers" to illegal collectives: Migrant domestic workers and meso-level resistances in Lebanon. *Gender & Society*, *26*(3), 382–405. https://doi.org/10.1177/0891243212439247

Pande, A. (2013). "The paper that you have in your hand is my freedom": Migrant domestic work and the sponsorship (Kafala) system in Lebanon. *International Migration Review*, *47*(2), 414–441. https://doi.org/10.1111/imre.12025

Puig-Ferriol Cabruja, A. (2021). *The kafala system: The case of Lebanon and ways forward* [Master's thesis, Universitat Autònoma de Barcelona].

Ramon Icart, L. (2021). *The UN's Sustainable Development Goals 5 and 8 in Lebanon: Women migrant domestic workers sustaining Lebanese lives while resisting the kafala system* [Bachelor's thesis, Universitat Pompeu Fabra].

Saravanamuttu, S. (2018, March 29). *Women and Kafala: Migrant domestic workers in the Gulf* [Conference paper]. Western Political Science Association Annual Conference, San Francisco, CA, United States. York University. https://www.wpsanet.org/papers/docs/WPSA_Saravanamuttu.pdf

Scott, J. C. (1999). *Weapons of the weak: Everyday forms of peasant resistance*. Yale University Press.

Sensenig, E. R. (2025). Beyond borders, beyond crisis: The experience of foreign nationals in Lebanon during wartime [Lebanese Emigration Research Center fact sheet series on forced displacement of foreign nationals 2023–2025]. http://ir.ndu.edu.lb/123456789/1817

Shukr, R., & Kazma, D. (2023). *Historicizing migrant domestic workers' community organizing and class struggle in Lebanon*. Anti-Racism Movement.

Tayah, M.-J., & Assaf, H. (2018). *The future of domestic work in the countries of the Gulf Cooperation Council*. Abu Dhabi Dialogue. https://www.academia.edu/37258418/

United Nations. (2015). *Transforming our world: The 2030 Agenda for Sustainable Development* (UN General Assembly Resolution A/RES/70/1). https://sdgs.un.org/2030agenda

Yasmine, R., & Sukkar, B. (2019). Restrained motherhood: the Lebanese state in times of changing demographics and moral values. Sexual and Reproductive Health Matters, 27(2), 27–38. https://doi.org/10.1080/26410397.2019.1643192

Yimer, B., Birhanu, T., Ankrah, F., Asfaw, D., Taleb, O., & Diab, J. L. (2025). Access to justice for Ethiopian migrant domestic workers: Unveiling legal, structural, and gendered violence in Lebanon. *Frontiers in Sociology*, *9*, Article 1486769. https://doi.org/10.3389/fsoc.2024.1486769

Zahreddine, N., Hady, R. T., Chammai, R., Kazour, F., Hachem, D., & Richa, S. (2014). Psychiatric morbidity, phenomenology and management in hospitalized female foreign domestic workers in Lebanon. *Community Mental Health Journal*, *50*(5), 619–628. https://doi.org/10.1007/s10597-013-9682-7

APPENDIX A

Interview Guide

Interview Guide: Mobility Control and the Kafala System in Lebanon

Introduction (5 minutes)

- • Briefly explain the purpose of the research (to understand migrant domestic workers' experiences of movement, autonomy, and strategies under the kafala system in Lebanon).
- • Reassure confidentiality and anonymity.
- • Emphasize voluntary participation, right to skip questions, or stop at any time.
- • Ask for informed consent.

Section 1: Life Story and Migration Journey (10–15 minutes)

(Build rapport and situate experiences in their personal background)

1. Can you tell me about yourself: where you grew up and your family background?
2. What was your life like before you came to Lebanon?
3. What made you decide to migrate for work?
4. How did you come to Lebanon? What was the process of recruitment like?
    - ○ Did anyone help you (agency, friends, family)?
    - ○ What were your expectations before arriving?

Section 2: Work, Daily Life, and Economic Situation (15 minutes)

(Contextualize working conditions, routines, and financial aspects)

5. Can you describe your daily work and responsibilities here?
6. How would you describe your relationship with your employer(s)?
7. Do you live with your employer or outside? How does that affect your life?
8. Outside of work, what do you usually do in your free time (if any)?
9. How much are you paid for your work, and how regularly do you receive your salary?
10. Are you able to save money or send remittances back home? How often?

11. Do you ever face deductions, delays, or withholding of your salary?

12. Besides your main work, have you ever had opportunities to earn additional income?

Section 3: Physical, Social, and Economic Mobility (15 minutes)

(Explore restrictions, social life, and possibilities for advancement)

13. Are you allowed to leave the house or workplace freely? If so, under what conditions?

14. Do you keep your passport and papers, or does your employer hold them?

15. How easy or difficult is it for you to visit friends, go shopping, or attend religious or community gatherings?

16. Have you ever wanted to travel within Lebanon or return home temporarily? How was that experience?

17. How does the kafala system (sponsorship) affect your ability to move around or change jobs?

18. How has your financial situation changed since you started working in Lebanon compared to before?

19. Do you feel you have more or fewer opportunities for economic advancement here than back home? Why?

20. If you wanted to improve your income or working conditions, what options are realistically available to you?

21. How do movement restrictions affect your ability to access better-paying opportunities or change employers?

Section 4: Autonomy, Control, and Financial Decision-Making (10 minutes)

(Zoom in on enforcement of restrictions and economic independence)

22. Have you ever felt controlled or restricted in your daily life by your employer or the system? How?

23. What rules or conditions do you have to follow regarding your movement, communication, or personal life?

24. How do these rules affect your sense of independence or freedom?

25. Who decides how your salary is used (you, your family, your employer)?

26. Do you feel you have control over your financial resources and decisions?

27. Has your employer ever restricted how or when you can send money home?

Section 5: Coping, Resistance, and Strategies (10 minutes)

(Explore agency within constraint)

28. What do you do to cope with restrictions on your movement or activities?

29. Have you found ways to negotiate more freedom or independence with your employer?

30. Do you have a network of friends, community, or organizations that support you?

31. Have you ever thought about leaving your employer or changing jobs? What challenges or risks did you face?

32. What strategies do you use to manage money and support your family despite restrictions?

33. Do you share financial advice or support with other workers in similar situations?

34. Have you ever considered or tried moving to another country for better economic opportunities?

Section 6: Reflections and Future (5 minutes)

35. Looking back at your time in Lebanon, how has your experience of mobility and freedom changed your life?

36. What would you like to see change in the system to make life better for migrant domestic workers?

37. Do you have any message you want to share with others about your experience?

Closing

- • Thank the participant for sharing their story.
- • Remind them of confidentiality and their right to withdraw their story at any time.
- • Offer information on support organizations (if appropriate).

APPENDIX B

Consent Form

Research Title: *Producing Immobility: Compound Control and Tactical Agency Among Migrant Domestic Workers in Lebanon's Kafala System*

Researcher: Nour AlDaouk
Institution: Università Degli Studi di Padova
Contact Information: nour.aldaouk@studenti.unipd.it

Purpose of the Study

You are being invited to take part in a research study about the experiences of migrant domestic workers in Lebanon, focusing on how the kafala system affects movement, autonomy, and daily life.

What Participation Involves

- If you agree, you will take part in a one-hour interview.
- You will be asked about your life story, your work in Lebanon, and your experiences of freedom, mobility, and daily challenges.
- With your permission, the interview may be audio-recorded to ensure accuracy.

Voluntary Participation

- Your participation is **completely voluntary**.
- You may choose **not to answer any question**.

- You may **stop the interview at any time** without any consequences.

Confidentiality and Anonymity

- Your name will **not** appear in the research or in any publications.
- A **pseudonym (false name)** will be used instead.
- All information will be kept confidential and stored securely.
- Only the researcher will have access to the recordings and notes.

Risks and Benefits

- There are no direct benefits to you for participating, but your story will help raise awareness about the experiences of migrant domestic workers.
- Some questions may be sensitive or emotional. You may skip any question or stop at any time.
- If needed, the researcher can share contact information for support organizations.

Consent Statement

Please read and tick the boxes below:

☐ I have read and understood the information above.
☐ I know that my participation is voluntary and I can withdraw at any time.
☐ I agree that the interview may be recorded (optional).
☐ I agree to take part in this study.

Participant's Name (optional): _____

Participant's Signature / Thumbprint: _____ Date: _____

Researcher's Signature: _____ Date: _____

APPENDIX C

Participant Demographics

The following table provides an overview of the ten participants who took part in this study. All identifying information has been replaced with pseudonyms to protect participant confidentiality.

Pseudonym	Country of Origin	Age	Duration in Lebanon	Current Status
Hannah	Sierra Leone	31	6 years	Escaped, living independently
Grace	Nigeria	45	5 years	Escaped, living independently
Anna	Kenya	27	2 years	Escaped in 2023
Naomi	Nigeria	57	13 years (since 2012)	Freelance domestic worker
Dahlia	Philippines	60	32 years	Living independently
Ruth	Philippines	42	12 years	Living independently
Mira	Madagascar	45	17 years	Living independently
Ella	Sri Lanka	43	15 years	Living independently
Kaya	Nigeria	44	14-15 years	Founded NGO (Sisters with a Strategy)
Valerie	Kenya	53	13 years	Living independently

Note: All participants were female migrant domestic workers who had escaped exploitative employment situations and were residing in Lebanon at the time of interviews. Interviews were conducted between 2024 and 2025. Interview durations ranged from 45 minutes to 2 hours, conducted in English.