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Stepwise and Return Migration between the Gulf, Europe and North America – How do GCC Countries Fare in the Global Competition for Talent?

No. 6

Regulating Passport-Based Wage Differentials in the Gulf

A Driver for Onward Migration

Anushka Bose

Executive Summary

GCC states attract significant foreign talent, with non-nationals comprising at least seventy-five percent of the private sector workforce.[1] However, these countries grapple with a talent retention challenge, as many high-skilled expatriates seek onward migration to North America and Europe in pursuit of permanent inclusion. Despite the critical contributions of expatriates to economic diversification initiatives, such as Saudi Vision 2030 and UAE Centennial 2071, retaining skilled professionals remains difficult.[2] This brief evaluates how limited settlement pathways and citizenship-based hierarchies, such as the 'citizenship penalty',[3] manifested into enduring citizenship-based wage disparities tied to passport power,[4] impeding foreign talent retention in the Gulf states.

These disparities emerge during three stages of an employee's career: during recruitment (citizenship-based wage differential by passport;[5] employment (the sponsorship or *kafala* system limiting job mobility);[6] and retirement (end-of-service gratuity[7] amplifying existing salary gaps). Professionals respond to these barriers through three major strategies: permanent emigration to countries offering citizenship, circular migration where they leave the Gulf for stronger economies and return later with higher bargaining potential and/or stronger passports, or stepwise migration, using experience in the Gulf to qualify for skilled visas and opportunities in Western countries.[8]

Together, these pathways illustrate how the Gulf thus functions as a strategic stepping stone rather than a final destination for many migrants. Yet strengthening talent retention is vital for achieving the economic diversification desired by the Gulf states. This brief thus recommends three reforms: salary-range disclosure for all high-skilled roles to curb citizenship-based bias at recruitment; softening the *kafala* system to allow intra-country employer change within shortage occupations across all six GCC

states, improving bargaining potential for higher wages; and introducing investment-based pension schemes to counter the downstream effects of citizenship-based wage differentials on retirement savings. Collectively, these measures address wage and mobility disparities while sustaining the participation of highly skilled talents, supporting the process of socioeconomic reform in the Gulf states.

Introduction

Economies in the six GCC states (Bahrain, Kuwait, Qatar, Oman, Saudi Arabia, and the United Arab Emirates) have long depended on foreign labour, with non-nationals accounting for up to 99 percent of private-sector employment in certain states.[9] Yet, whilst economic growth rates, employment opportunities, and perks such as tax-free salaries have attracted global talent to the region for decades, the Gulf states' migration models generate profound challenges for long-term workforce retention. Temporary work visas, employer-tied sponsorship (*kafala*), and stratified pay structures perpetuate uncertainty among migrants, preventing most expatriates from building durable careers in the region. Among these dynamics, the 'citizenship penalty', or the practice of institutionalising citizenship-based wages and career advancement disparities based on the worker's passport,[10] is especially conducive to the onward migration of foreign highly skilled workers from Gulf states.

The following sections analyse how foreign highly skilled workers are motivated to migrate onward from Gulf states, largely by citizenship-based wage differentials at three stages of their career: recruitment, employment, and retirement. The brief then proposes three policy recommendations that intervene at each of these stages to reduce the negative impact of the citizenship penalty, thereby enhancing the retention of skilled workers and supporting economic diversification agendas of the GCC countries.

Background, Context, and Methodology

Oil revenues have shaped labour and social policies in the Gulf since the mid-20th century.[11] GCC states reinvested hydrocarbon wealth into citizen welfare and governmental employment whilst recruiting temporary workers in the private sector under employer-sponsored visas in the *kafala* system. The Gulf's traditional migrant labour model centres on labour-intensive sectors and short-term employment, facilitating rapid workforce turnover. This model served infrastructure projects but presents challenges in knowledge sectors requiring workforce continuity.[12] In addition, the GCC countries restrict citizenship to nationals, leaving long-term residency largely unavailable to most expatriates, despite recent programs, like the Golden Visa and Premium Residency, that are accessible only to select groups due to rigid eligibility requirements that are out of reach for many foreign workers.[13]

Multiple sources document the wage disparities embedded in the Gulf migration system. The Gulf Business Salary Survey, conducted annually for five consecutive years between 2013 and 2017, found that senior professionals holding Asian passports earned 26 percent less than their counterparts with Western passports in equivalent roles.[14] Subsequent analyses of salary data in the United Arab Emirates confirm that these patterns persist.[15] Moreover, a recent report also reveals instances of South Asian engineers receiving offers as low as USD 816 per month, whilst similarly qualified nationals with stronger passports secure substantially higher wages or more senior positions.[16]

The economic logic of reservation wages,[17] or minimum acceptable salaries set by the worker, dependent on currency power and opportunities in one's home country, may explain why employers offer higher salaries to those with better mobility and bargaining power in the global labour market (holders of 'stronger' passports) and lower salaries to those with fewer labour mobility options (holders of 'weaker' passports). However, all residents face identical living costs in the Gulf, regardless of the country that their passport was issued in, and the cumulative effect of citizenship-based wage penalties across career stages affects foreign workers' long-term financial and life planning.

Recognising the limitations of their passports' 'value' in labour markets across the GCC, many high-skilled workers pursue onward migration strategies. These include relocating abroad to obtain long-term legal status (permanent emigration), acquiring alternate citizenship in a Western country before returning to the Gulf with strengthened bargaining power (circular migration),[18] and leveraging work experience in the GCC to secure higher-paying opportunities in Western labour markets (stepwise migration).[19]

This brief synthesises cross-industry salary surveys,[20] GCC labour statistics, compensation reports, media and firm reports, and policy documents. Despite data limitations, convergent findings across sources support the core argument.

Key Findings and Analysis

Stage One: Passport-Based Anchoring at Recruitment

Citizenship-based wage disparities begin at recruitment in the employee's corporate life cycle. First, most job postings in the GCC do not disclose salary ranges, but some evidence of passport-based differentials in salaries of reference can be found in certain job-listing platforms.[21] Second, employers retain the ability to request salary history,[22] potentially engaging in behavioural anchoring where prior earnings suppress offers even when irrelevant to local market rates.[23] This creates a pathway through which wage differentials from origin countries—where purchasing power, cost of living, and salary norms differ substantially—are imported directly into labour markets in the Gulf. As legal experts in the UAE note, requesting pay slips is neither prohibited nor required by law,[24] meaning employers face no penalties for perpetuating nationality-based pay disparities at the hiring stage. However, salary-range disclosure could counter this by establishing transparent benchmarks that anchor offers to market conditions from the start.

International jurisdictions have recently set a precedent on global best practices. Over 20 states in the U.S., including California, Massachusetts, and New York, have enacted laws banning salary-history inquiries.[25] The European Union's (EU) Pay Transparency Directive also represents a binding regulation requiring all 27 member states to prohibit such questions in national law by August 2026.[26]

Stage Two: Obstacles to Sponsor-Change Mobility Limits Employees' Bargaining Power

Beyond the initial recruitment stage, the GCC's sponsorship-based visa system imposes additional constraints during employment. Under the *kafala* system, work permits are tied to individual employers.[27] Reforms to soften and improve the system have been encouraging, but uneven[28] across the GCC. In addition to the sponsor-free Golden Visa schemes, the UAE's Green Visa, for example, allows self-sponsorship for five years,[29] and Saudi Arabia's 2021 Labour Reform Initiative introduced encouraging reforms[30] along with Qatar in 2020.[31] However, workers' mobility still faces some constraints. For example, the employer's consent may be required, and a minimum period may have to be completed before changing employer. In the case of Kuwait, workers must complete one year of service before changing employer with approval, and three years if the employer disagrees.[32] If workers do change the employer before their three years are up, they are required to pay a fee.[33] In Bahrain, the government repealed the Flexi-Permit option in 2022, which previously allowed high-skilled expats to work in the Kingdom without a sponsor. Of the many concerns listed as reasons for its abolishment, one was the loss of employers' bargaining power and control over an employee's mobility.[34]

When switching employers is costly or impractical, wage negotiations become constrained. This disproportionately affects holders of weaker passports who face steeper barriers to re-entry and limited global labour mobility options, and thus accept lower wage opportunities in the Gulf.[35] Additionally, when workers cannot switch employers easily, labour markets become monopsonistic: Employers gain wage-setting power unrelated to productivity or scarcity,[36] whilst employees face the binary choice of either accepting offered wages or exiting the region entirely. The healthcare sector clearly illustrates these challenges. Despite rising regional demand for qualified professions, passport-based wage disparities influence talent outflows.[37] In one study, Filipino nurses reported salary gaps as high as three-fold compared to colleagues holding stronger passports in identical clinical roles.[38]

Stage Three: The Retirement Multiplier

The third and final stage, compounding passport-based disparities, is retirement. End-of-service gratuity (EoSG) schemes amplify initial wage gaps as they are based on employees' base salaries, which are themselves influenced by citizenship-based wage differentials.[39] Beyond the formula itself, lump-sum gratuities held on employers' balance sheets expose workers to insolvency risk, inflation erosion, and foregone investment returns.[40] When expatriates repatriate these lump sums, they face currency-conversion losses, inflation considerations, and administrative hurdles in their home countries.[41] The compounded effect of lower starting salaries and static gratuity formulas undermines employees' financial stability and retirement security. According to a survey of 1,504 expatriate workers across Qatar, Saudi Arabia, and the UAE, 60 percent deemed the region's EoSG system insufficient for meeting retirement needs.[42]

Fortunately, alternatives are slowly emerging. Models such as the Dubai International Financial Centre's (DIFC) Employee Workplace Savings (DEWS) scheme, demonstrate both the demand for better alternatives and their feasibility: Professionally managed pension investments for expatriates, as an alternative to EoSG, grew assets from USD 119 million in 2020 to USD 555 million in 2023, achieving 7 to 9 percent net annual returns and over 70 percent participation in financial and professional sectors.[43]

Policy Recommendations

Building on these findings, the following three interventions target each career stage where citizenship-based wage differentials compound downstream professional mobility, offering governments in the GCC pragmatic measures to offset the citizenship penalty.

Recruitment: Mandate Salary-Range Disclosure in All Job Postings

- What It Entails**:** Push pay transparency by requiring all employers to publish salary ranges (minimum to maximum compensation) in job advertisements and postings.
- Who Implements: Labour ministries in the GCC and HR departments
- Justification: Passport-based wage gaps originate in the hiring stage, where employers potentially adjust offers according to candidates' prior earnings from their passport countries, even though they have vastly different currency powers. Salary disclosure eliminates this mechanism by establishing transparent market benchmarks upfront. Comparative evidence from over 20 states in the U.S.[44] and the EU's Pay Transparency Directive[45] demonstrates that mandatory disclosure narrows inequitable pay gaps. By neutralising 'passport premiums' at

their source, this reform diminishes downstream impacts on mid-career bargaining and retirement gratuities whilst building trust and transparency with international talent pools.

Employment Years: Extend Job Mobility Reforms Across All GCC States for High-Skilled Workers

- What It Entails: Remove employer control over mobility in shortage occupations
- Who Implements: Labour ministries across the GCC

Example (1): *Kuwait*

- Context: Kuwait restricts job mobility in the first one to three years of employment. Migrant workers generally cannot change employers without the employer's consent until completing three years of service, and Kuwait has added a KWD 300 (~USD 970) early transfer fee for workers who try to move within those first three years.[46] This combination creates a hurdle that may discourage high-skilled workers from changing employers within their first three years, weakening their bargaining power.
- Policy Recommendation: Allow high-skilled workers in clearly defined shortage occupations to change employers anytime without a financial penalty.

Example (2): *Bahrain*

- Context: In Bahrain, a high-skilled expat can transfer from Employer A to Employer B without leaving the country, but the process is still largely controlled by the previous employer. If the employer cooperates, they approve the switch through the Labour Market Regulatory Authority's Expat Management System using the 'Allow Mobility' function.[47] If the employer refuses, the worker can still transfer, but only after at least twelve months of service and formal notice procedures, and only if the new employer files a transfer request. Bahrain also rolled back its Flexi-Permit in October 2022 after pressure from employer groups who argued that easier mobility weakens employers' bargaining power.[48]
- Policy Recommendation: Re-establish a protected, employer-independent mobility track for high-skilled workers in shortage occupations so movement does not depend on employer release or on waiting twelve months to leave without consent and is shielded from future rollback.

Example (3): *Oman*

- Context: Oman removed the former No Objection Certificate (NOC) requirement in 2021. However, the reform is conditional: Employees may change employers only if they can provide proof that their previous employment contract has ended or been terminated[49] (i.e., the contract has naturally expired or the employer ended it, rather than simply resigning mid-contract and moving to a new sponsor).[50]
- Policy Recommendation: Remove the requirement to show proof that the previous contract has ended or been terminated before being able to switch employers.
- Justification: High-skilled workers in Oman still face employer-dependent mobility to varying degrees. These structural limits suppress wage bargaining and push talent to exit the region instead of renegotiating inside it. In contrast, Saudi Arabia, Qatar, and the UAE have softened or dismantled elements of the traditional *kafala* system by easing some rules for changing employers, expanding limited self-sponsorship, and lengthening certain grace periods. Extending comparable reforms across all six GCC states, including in Oman, would help keep specialised workers circulating within the region.

Retirement: Establish Portable Investment-Based Pension Accounts

- What It Entails: Introduce portable, defined-contribution pensions alongside end-of-service gratuity.
- Who Implements: GCC finance and labour ministries, modelled on pilots in free zones, such as the Dubai International Financial Centre's (DIFC) Employee Workplace Savings scheme (DEWS).
- Policy Recommendation: Encourage employers to offer portable, defined-contribution pension schemes alongside ESoG. When employers opt in, they make mandatory monthly contributions for all eligible employees. Employees can select from a range of investment options, such as Sharia-compliant funds, capital-protected choices, and lifecycle funds, and may also voluntarily contribute a percentage of their gross income to build additional retirement savings.
- Justification: EoSG amplifies existing salary gaps by locking 'passport premiums' into retirement. Without investment-based pension options, ESoGs face currency losses, inflation, and tax hurdles upon repatriation.[51] The success of regional programmes demonstrates demand for alternatives, with participation rates in defined-contribution pension schemes exceeding 70 percent.[52] Surveys further confirm the appetite: whilst 84 percent of expatriates cited employer benefits as influencing their decision to move to the Gulf, the same proportion expressed concerns about retirement security under current systems.[53] Defined-contribution pensions preserve wealth against exchange-rate and inflation risks, enable steady retirement savings growth, and retain capital domestically rather than losing it in remittances. When employees can plan better for retirement, even from within a temporary structure of employment, it grants them greater agency over their financial security.

Conclusion

The GCC's diversification agendas are strengthened when high-skilled workers can be retained and redeployed within the region rather than leaving after a contract ends or a role is cut. For many expatriates, that outcome is shaped by a citizenship penalty. The recommendations in this brief intervene at each stage where the citizenship penalty accumulates. First, mandatory salary-range disclosure at recruitment establishes transparent pay bands for all applicants and helps curb the citizenship-based wage penalty at its source. Second, the option to change employers without penalty during employment increases bargaining power for workers, resulting in higher salaries. Third, introducing investment-based, portable pensions as an alternative to EoSG gives the GCC states the ability to store and grow wealth inside the country, as well as enables expats to accrue their savings better than the standard EoSG plan. These measures will not resolve every factor behind onward migration, but they target structural points in the employment cycle where the citizenship penalty has an impact. With reforms, the GCC can strengthen its competitive position for global talent with alternatives in the West, not by offering a pathway to citizenship, but by making staying a viable option.

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