

Beyond “Eurokafala”: A globally connected approach to entry, settlement, and citizenship

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Abstract

Recent immigration reforms in the UK and across Europe have generated renewed commentary on the conditional nature of contemporary settlement regimes. In this context, some commentators have invoked the idea of “Eurokafala” to suggest that liberal democracies are drifting toward systems associated with the Gulf’s employer-sponsored, temporary migration regimes. This essay argues that such framings, while rhetorically striking, are analytically misleading and politically consoling. By suggesting that Europe is becoming more like the Gulf, the Eurokafala frame dehistoricises Europe’s long-standing reliance on conditional inclusion, employer sponsorship, and restricted access to social rights and settlement, while casting the Gulf as an analytically external site of illiberal migration governance. The analysis is informed by ongoing research on visa and citizenship regimes in the Gulf, alongside historically grounded engagement with immigration governance in the UK.

Drawing on examples from both contexts, the essay advances a relational, globally connected analysis of migration regimes that foregrounds shared logics of valuation, selectivity, and differential access to long term security. It shows how wealth and skills increasingly mediate access to long-term residency and social protection across regions, while citizenship itself offers diminishing guarantees of stability. Rather than asking whether Europe is becoming more like the Gulf, the essay examines what the rise of earned settlement reveals about the hollowing out of citizenship under contemporary capitalism.

Policy Recommendations

- Centre immigration status within mainstream social and labour policy design, requiring welfare, housing, and employment reforms to assess impacts across differentiated migration statuses rather than assuming either citizenship or exclusion as the norm.
- Increase visibility around the relationship between fiscal and immigration policy, with stronger policy debate and advocacy informed by clear evidence on revenue raised through visa fees and surcharges, how these funds are allocated, and their distributive effects across different groups.
- Develop migration policy through a relational framework, accounting for how UK settlement rules interact with other key migration contexts, including Gulf residency regimes, in shaping mobility patterns, skill flows, and long-term settlement decisions.

Framing the problem: What “Eurokafala” does

In recent months, the language of earned settlement has moved to the centre of British political debate following the government’s 2025 immigration white paper, [Restoring Control](#). The Home Office’s proposals for a [‘fairer pathway’ to settlement](#) include extending the qualifying period for Indefinite Leave to Remain from five to ten years, introducing accelerated routes for high earners, and lengthening the pathway for those who rely on public funds - reinforcing a more conditional settlement system in which eligibility is more closely linked to self-reliance.

Reform has gone further still, proposing to [scrap Indefinite Leave to Remain](#) altogether while restricting access to welfare rights exclusively to citizens. Reform UK has also unveiled a proposed [“Britannia Card”](#), offering wealth migrants a 10-year UK residency for £250,000, exempting them from tax on overseas income, assets and capital gains.

It is within this wider context that references to the Gulf states have surfaced. Commentators have warned that liberal European democracies are drifting toward a kafala-like system, drawing comparisons with the Gulf’s employer-sponsored, temporary migration regimes, long criticised for producing dependency and precarity. [In a recent Financial Times article](#), this trajectory was labelled “Eurokafala”, a future in which migrants are incorporated with fewer rights, risking, as the author says, the creation of ‘a permanent second-class caste’ within Europe.

Framing contemporary European migration reforms through the lens of Eurokafala is analytically misleading and politically consoling. This is not to deny the coercion and dependency produced by sponsorship systems in the Gulf, particularly for low-wage migrant workers and those without financial or passport privilege. Nor

does it adopt a comparative move that relocates critique elsewhere or flattens distinctive features of Gulf migration regimes, particularly the near absence of formal pathways to permanent settlement and citizenship.

The problem with frames such “Eurokafala” lies elsewhere: it relies on a liberal versus autocratic binary that treats restrictive border and settlement regimes as regionally exceptional rather than [historically embedded and structurally shared](#). By suggesting that Europe is becoming like the Gulf, the frame dehistoricises Europe’s own long-standing systems of temporary migration and differentiated entry and settlement rules, casting the current moment as a rupture from an otherwise liberal past. In doing so, they reproduce a familiar ontological division between the ‘West’ and “the rest” as fundamentally distinct modes of migration governance, rather than interrogating the shared logics through which mobility has long been selectively managed.

One way to see what the Eurokafala frame obscures is to situate contemporary reforms within the longer history of temporary labour migration as a governing technique. Historically, such programmes have relied on time as the central mechanism of differentiation. From the indentured labour schemes developed by the British Empire following the formal abolition of slavery, to post-war “guest worker” programmes in Western Europe that recruited millions of workers from Turkey and North Africa, residence was tied to employment and economic productivity, with limited rights and little prospect of citizenship, and with the expectation that workers would eventually return. The perceived failure of these programmes, when those imagined as temporary workers instead settled and formed families, was famously

captured by Max Frisch in 1965: *“We wanted workers, but we got people instead.”*

Far from receding, this logic has intensified in recent decades. Contemporary [seasonal and sector-specific migration programmes, including agricultural schemes across Europe and North America, continue to organise mobility around the foreclosure of rights and settlement](#): in Canada, the expansion of temporary migration has been so pronounced that admissions through temporary programmes have exceeded those granted permanent status. Temporariness should therefore be understood not as an external model, but as a durable and adaptable mode of migration governance organised through differential access to security and rights.

A substantial body of scholarship on the Gulf has already [challenged portrayals of the region as exceptional](#) in the way migrant labour is regulated and treated, situating its migration regimes within [global histories of labour mobility, capital accumulation, and empire](#). Building on this work, this essay argues that the analytical problem lies less in whether the Gulf is treated as exceptional, and more in how contemporary invocations of “Eurokafala” reproduce this framing to make sense of changes unfolding within Europe. Eurokafala works as a cautionary mirror, allowing developments in Europe to be narrated as unprecedented decline rather than as the intensification of long-standing modes of governing mobility and settlement.

In the UK, the linkage between immigration control and welfare is long standing. [The 1905 Aliens Act](#) formalised this connection by defining the “undesirable alien” as someone unable to support themselves and therefore liable to become a charge on public funds, while establishing systems to police entry. The Act was closely associated with the exclusion of Jewish migrants fleeing pogroms in Eastern Europe, who were widely framed as destitute and culturally

separate. As Arthur Balfour argued during parliamentary debates, even “able and industrious” Jewish migrants were cast as a fiscal burden and “a people apart.” These logics were subsequently embedded in welfare provision, including the 1908 Pensions Act and early unemployment benefits designed to protect domestic workers.

This nexus between legal status, labour control, and welfare entitlement did not weaken over time but instead intensified. [The 1948 Nationality Act](#) affirmed the right of imperial subjects to live and work in the UK, primarily to protect the mobility of White Britons abroad, while also extending these rights to non-White Commonwealth citizens, including the [Windrush generation](#). These rights were later retrospectively undermined as long-settled residents were reclassified as ‘unlawful’ in what became known as the Windrush scandal. [The No Recourse to Public Funds \(NRPF\)](#) condition extends this same governing logic in a standardised form today. Formalised by the Immigration and Asylum Act 1999 and expanded in subsequent years, including to human rights cases in 2012, NRPF has become a standard condition attached to many visas in the UK, including those on work, study, and some family visas, as well as people without a valid legal status, and prevents access to most welfare benefits and local authority support, part of a larger policy known as [‘Hostile Environment’](#) introduced in 2012. Contemporary efforts to further restrict access to public funds should therefore be understood not as a rupture, but as the continuation of long-standing strategies of conditional inclusion and exclusion.

Eurokafala also rests on an idealised understanding of citizenship as an equalising institution. Claims that contemporary immigration proposals risk creating novel caste-like hierarchies implicitly reproduce a Marshallian vision of social citizenship, in which legal

membership is assumed to deliver social equality. Yet citizenship has always been structured by classed, gendered, and racialised inequalities, with differential access to welfare and protection exposing the limits of the social democratic ideals articulated by Marshall and later Esping-Andersen.

Framing current reforms as the emergence of an unprecedented second-class status therefore risks reproducing a myth of citizenship as historically universal and egalitarian, rather than recognising its enduring role as a stratifying and disciplining mechanism. The conditional and revocable nature of legal status, visible in the Windrush scandal and in contemporary debates over the [expansion of citizenship deprivation powers](#), illustrates how exclusion has long been managed through gradations of membership. Eurokafala narrative renders these continuities invisible by casting present debates as exceptional rather than as recalibrations of long-standing hierarchies.

The task, then, is not to ask whether Europe is becoming more like the Gulf, but to examine how migration regimes across regions are governed through shared logics of valuation, selectivity, and differential access to security. These logics have long operated through nationality-based exemptions, most notably for EU nationals prior to Brexit, but are now becoming more visible as such exemptions are eroded.

The article adopts a relational and historically grounded approach to the study of migration and citizenship. Rather than comparing discrete national models or contrasting Europe and the Gulf along a liberal-illiberal axis, it treats migration regimes as co-constituted through shared histories and circulating policy logics. Here, “relational” does not simply refer to the fact that core policy features are shared within an overarching capitalist frame. Rather, it denotes how migration regimes interact within a common

field of financial and racial logics, where states, intermediaries, and migrants respond to regulatory signals across jurisdictions. The analysis therefore disavows methodological nationalism, focusing on how practices of selection, conditionality, and exclusion emerge across contexts through interconnected governing rationalities, even where institutional forms diverge.

Empirically, the argument draws on over a decade of research on migration governance in the Gulf, particularly the United Arab Emirates. My current work examines how temporary migration regimes converge with global financial logics, including in relation to [retirement and later life](#), producing a nexus between welfare, finance, and (non)citizenship in which security and rights are increasingly allocated through asset ownership and economic valuation. I read contemporary UK debates in dialogue with these developments, using insights from the Gulf to illuminate how settlement, border rules, and access to rights are being recalibrated through shared financial logics, with implications for both citizens and non-citizens.

The analysis is also informed by research-led teaching on British immigration governance. In particular, I draw on a course I convene, *Race, Power and Social Policy*, which situates contemporary UK debates on citizenship, immigration control, and welfare within longer histories of racialised and conditional inclusion. This historically situated approach functions not as contextual background but as an analytical method, through which the present is examined as a moment within longer trajectories of governing mobility through time, labour, and rights. Mechanisms such as employer sponsorship, NRPf, and earned settlement are read as reworkings of earlier techniques of conditional inclusion shaped by empire, post-war labour recruitment, and welfare state formation. Together, this relational and historically

grounded approach shifts the unit of analysis from national migration regimes to global logics through which access to security is differentially allocated across space and time, rendering claims of novelty, rupture, or exceptionalism analytically unstable.

Demystifying kafala: A system of employer led sponsorship

Kafala is most commonly invoked through the emblematic figure of the construction or domestic worker, whose vulnerability under employer sponsorship is both real and well documented. Yet this figure has come to function as a shorthand for Gulf migration regimes as a whole, collapsing a highly stratified system into a singular image of unfreedom and exploitation. In practice, migration governance in the Gulf differentiates sharply across sectors, skill categories, wealth, nationality, gender, and legal status.

What is distinctive about the Gulf is that most migrants and their descendants, including those born and raised in the region, remain temporary residents. Temporary migration thus operates as a form of inherited precarity, whereby children born to non-citizen parents [inherit both their parents' nationality and their temporary legal status](#). For lower-income migrants, legal status remains closely tied to employment, rendering residence highly vulnerable to job loss, contract termination, or deportation. By contrast, for those with higher levels of human, passport, or financial capital, temporary legal status can often be rendered largely inconsequential, managed through investment and assets in the Gulf or abroad, onward migration, or the acquisition of citizenship elsewhere.

It is precisely this internal differentiation that is flattened in dominant representations of Gulf migration regimes. Global media and policy

discourses frequently collapse these complexities into a singular image of exploitation. The intense scrutiny surrounding the [Qatar World Cup](#), for instance, foregrounded the conditions of construction workers, while detaching these from wider global processes of labour extraction and migration governance, reinforcing an ontological divide between the Gulf and liberal migrant-receiving states.

Read historically, this framing becomes difficult to sustain. Employer sponsorship systems in the Gulf were formalised during the [British colonial period, from the 1920s to the 1970s](#), as mechanisms to regulate labour deemed economically necessary yet politically risky. British rule in the region also shaped migration between the Gulf and other parts of the Empire, including Zanzibar, using [property ownership and business activity as selection mechanisms](#) that differentiated access to residence and mobility. Persistent portrayals of kafala as a foreign or exceptional system thus obscure Europe's own role in shaping regimes of migrant labour control, both domestically and across its imperial territories.

Against this backdrop, contemporary debates on entry, settlement, and citizenship in Europe appear less distinct than often assumed. The use of the term *kafala* itself can reinforce this distortion. Derived from [kafil](#), meaning legal guarantor, kafala refers to an employer-led sponsorship system that is not unique to the Gulf.

In the UK, employer sponsorship has governed non-EU migration for decades, binding legal residence to continued employment or study, and rendering job loss or the end of study a potential trigger for exit. The NRPf condition restricts access to welfare for millions of temporary migrants and their families, while [immigration healthcare surcharges and escalating visa fees impose additional fiscal burdens on non-citizens](#), often amounting to a form of double

taxation. These measures structure a migration regime organised around conditional inclusion and the expectation that migrants demonstrate financial self-sufficiency.

These arrangements have recently attracted heightened public attention, including media coverage of a Nobel Prize winning scientist who warned that [high visa fees and healthcare surcharges risk deterring early career researchers](#). His remarks brought into view constraints around financial self-sufficiency that have long structured entry and settlement for other migrants, whose mobility has routinely been conditioned on their ability to absorb costs and avoid reliance on public funds.

What has changed in the post-Brexit period is not the logic of this system, but the nationality-based differentiation through which it operated. Prior to Brexit, EU citizenship functioned as an exemption from migration control at labour market entry, while non-EU nationals were required to secure residency through employer sponsorship. Brexit did not dismantle this conditional model but extended it to EU nationals, generalising a system in which access to work, welfare, and long-term residence is increasingly conditional, costly, and tightly regulated.

Across both the UK and the Gulf, a shared functional shift is evident in how security and rights are allocated. In the UK, welfare retrenchment and the move toward asset-based welfare have weakened the capacity of citizenship to guarantee social protection, while migrants are increasingly required to demonstrate self-sufficiency through income thresholds, visa fees, and exclusion from public funds. In the Gulf, human and financial capital offer access to forms of stability traditionally associated with citizenship, including longer-term residence, family unity, and access to services, without extending formal citizenship itself. In

both contexts, security is increasingly detached from legal membership and reattached to valuation, allowing [capital to substitute for time](#) and assets to substitute for welfare.

It is against this backdrop that comparisons between the UK and the Gulf are often misread. Observations that wealth and skills can provide long-term security in both contexts are frequently interpreted either as evidence of liberalisation in the region or as signs of Europe's slide toward an illiberal model. Both readings obscure the shared governing logic at work. Across the Gulf, particularly in the context of efforts to diversify away from oil-based economies, longer-term residency options commonly referred to as golden visas have expanded significantly over the past five years. These pathways are not limited to ultra-wealthy investors, but increasingly extend to those [deemed valuable in terms of human capital](#).

Some of these visas offer what can be described as citizenship-like rights without extending formal citizenship. These include long-term or permanent residency, sponsor-free residence, [access to public healthcare and education](#) in some contexts, and expanded family sponsorship, such as the ability to sponsor older parents. Most importantly, they decouple residency from employment status, removing the requirement of a local sponsor to enter and remain in the country. This marks a significant shift in how the kafala system operates and is popularly understood.

[The extension of golden visas to nurses in the United Arab Emirates](#) following COVID-19 illustrates this shift. These visas provide five- to ten-year renewable residency, sponsor-free living, and expanded rights to family unity, reflecting a labour retention strategy shaped by workforce needs rather than a move toward citizenship. By contrast, recent changes in the UK, including higher salary requirements, tighter rules

on dependants, and proposals for longer settlement timelines for lower wage workers, including nurses, have compounded insecurity and raised [concerns about recruitment and retention within the NHS](#). Experiences of [racism](#) within the UK healthcare system further shape decisions to leave or avoid settlement.

Similar contrasts emerge in relation to students and graduates. The UAE has extended long term, sponsor free residency, [golden visas to high-achieving secondary school students and university graduates](#), while debates in the UK have focused on [restricting graduate visas and bringing dependants](#). In this context, the Gulf increasingly appears not as a temporary staging ground before onward migration, but as a site of longer-term residence shaped by expanding residency rights, while pathways in Europe contract.

Even prior to these recent changes, the Gulf's borders were often more porous than those of Western states for migrants lacking passport privilege. Employer-led residency allowed access through job offers rather than restrictive visa regimes, while employers frequently covered healthcare and residency costs. The expansion of long-term, sponsor-free visas builds on this history, while further decoupling residency from employment, thus allowing entry without having to have a sponsor. What differs is not the principle of selection, but how and where it is currently being expanded or withdrawn.

These shifts actively shape migrant decision-making with global labour market implications. For some, onward migration to the West is valued primarily as a means of acquiring a more secure passport, followed by a return to the Gulf for work and lifestyle. The mainstreaming of far-right politics and anti-immigration sentiment has made Western destinations less appealing for many migrants in the Gulf, the majority of whom originate from countries in the Global South. For

others, including [European Muslims, the Gulf offers an alternative route out of personal and professional stagnation shaped by racism and exclusion in Europe](#).

Another example here illustrates the importance of a relational approach. In 2025, as the US and EU tighten scrutiny of citizenship-by-investment programmes, threatening visa-free access for countries operating such schemes, UAE-based consultancy firms have begun reframing Emirati [golden visas as more 'sustainable' and legitimate' alternatives](#). Many UAE residents, among the largest consumers of CBI passports, now face weakened mobility despite [significant financial investment](#). Consultancy firms both register these anxieties and recalibrate accordingly, positioning UAE residency as a hedge against uncertainty elsewhere. What appears as regional divergence is thus embedded within an interconnected field of financialised mobility governance, where policy shifts in one jurisdiction reshape strategies and market responses in another.

Importantly, wealth, class, and skill do not map neatly onto a simple Global North/South or white/non-white divide. In contexts such as the Gulf, where large migrant populations originate from the same regions, internal stratification along income, passport status, and asset ownership is highly pronounced yet rarely addressed, despite the way it complicates understandings of race based solely on identity or culture.

These dynamics are not exceptional to the Gulf and are equally relevant elsewhere. However, a small city like Dubai offers a particularly stark illustration. Indians, for example, are among the [largest owners of luxury property](#) in the city, while also being disproportionately represented in lower-paid work. Similarly, purchasers of citizenship-by-investment passports in the UAE and wider Gulf largely comprise nationals of countries commonly categorised as part of the

“Global South,” many of whom navigate passport disadvantage within temporary migration regimes. This does not suggest a straightforward privilege: many invest substantial savings in pursuit of residential security and global mobility, often at the expense of housing stability, education, or long-term financial security. What it reveals instead is how asset-based inclusion reconfigures not only access to long-term security, but the material production of racial hierarchy itself, challenging assumptions that privilege and disadvantage map neatly onto fixed regional or racial categories.

These dynamics have important implications for how race is understood within migration governance. Borders do not operate uniformly, even for people who share the same nationality or skill-sets, but are encountered through intersecting hierarchies of class, legal status, and perceived value. Race is produced through these interactions, shaping who is rendered desirable, disposable, or risky within systems of mobility and settlement. A relational lens makes visible how racialisation is embedded not only in overt exclusion, but in the uneven allocation of security, rights, and mobility through ostensibly neutral mechanisms of migration control.

Conclusion: Why the Gulf matters for understanding migration, citizenship and social policy

Seen from this perspective, citizenship and migration policy are not fixed or stable categories, but mutable technologies of governance tied to particular political and economic projects. They are assembled through immigration controls, labour regimes, welfare systems, and fiscal instruments that sort populations according to desirability, disposability, and risk, with significant implications in the way we understand racialised difference and inequality. Non-citizens are not

admitted simply to fill labour shortages, but to the extent that they are evaluated according to their anticipated return, whether economic, demographic, geopolitical, or moral.

What emerges from this analysis is not policy convergence between Europe and the Gulf, but a shared governing logic. Across different institutional contexts, capital increasingly functions as the mechanism that can shortcut time. Whether through golden visas, accelerated settlement pathways, employer sponsorship, or welfare exclusion, long-term security is no longer secured primarily through residence, contribution, or legal membership, but through demonstrable economic value and financial independence.

From this vantage point, the question is not whether Europe is becoming more like the Gulf, or whether the Gulf is liberalising. Rather, it is what the rise and normalisation of [“earned settlement”](#) reveals about the changing meaning and materiality of citizenship itself. Citizenship, once imagined as a stable endpoint and guarantor of social protection, is increasingly reconfigured as a flexible, stratified, and conditional status. In the UK, citizenship is being hollowed out, rendered uneven, increasingly financialised, and reversible even for those who formally possess it, and financialised - while in the Gulf, regimes of quasi-citizenship extend selective rights without full legal membership. Crucially, citizenship in the Gulf is itself [internally stratified and legally precarious](#), remaining subject to revocation even among [high profile individuals](#), underscoring that conditionality is not confined to non-citizens alone. Across these contexts, partial statuses and insecure forms of membership operate together, pointing to a broader shift toward fluid and relational configurations of citizenship rather than a linear decline or expansion as such.

Taking the Gulf seriously, not as a warning sign, but as an analytical starting point, allows these transformations to come into sharper focus. The Gulf states occupy a central position in the contemporary global migration order, hosting the largest South-South migration corridor while increasingly attracting migrants from Europe and other high-income regions. These movements reflect shifting labour markets, tax regimes, welfare retrenchment, and immigration policies that cut across conventional North-South distinctions.

To recentre the Gulf in migration studies, then, is not simply to expand the geographic scope of analysis or to diversify case studies. It is to reorient the theoretical foundations of the field itself. The Gulf foregrounds forms of mobility and settlement organised around various grades of temporariness or permanency, challenging frameworks that assume settlement, integration, or citizenship as normative endpoints. Rather than treating the UAE or other Gulf states as outliers, we should understand them as critical sites of anticipation- not in the sense of a warning sign or a future direction that Europe is destined to follow, but as analytic sites in which the tensions, techniques, and rationalities that are increasingly shaping regimes of citizenship and mobility are rendered particularly visible and explicit.

Approaching migration relationally, rather than through comparison or contrast, shifts attention to the socio-political and financial logics that

shape access to long-term security across regions. It reveals how wealth and skill are captured, valued, and mobilised within global systems of migration governance, and why familiar binaries, such as North and South, temporary and permanent, citizen and migrant, are increasingly inadequate for making sense of lived experiences of (non)citizenship today.

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