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Nationality Law and Labor Migration: A Comparative Analysis of Legal Frameworks and Economic Outcomes in the United Arab Emirates and United Kingdom

Cassadee Orinthia Yan¹

Abstract

This paper presents a comprehensive comparative analysis of the legal structures governing nationality laws and labour migration in the UAE and the UK, shedding light on their respective economic repercussions. In examining these legal systems, the study delves into the UAE's distinctive kafala system, which tightly binds migrant workers to their sponsors, and holds it in contrast to the UK's point-based immigration system based on rules and regulations. Despite these differences, both nations have witnessed tangible benefits from labour migration, including increased productivity, the creation of new jobs, and economic diversification. However, this study highlights the lack of discernible correlation between changes in GDP and alterations in immigration laws within the UAE and the UK. The implications of these findings are far-reaching, underscoring the imperative for effective legal frameworks to optimise the economic gains derived from labour migration. Policymakers stand to gain valuable insights for addressing wage disparities and promoting social integration through the knowledge derived from this research, enabling them to formulate policies that maximise the benefits of labour migration while minimising its drawbacks. To fully understand the long-term effects of labour migration on economic growth, it is crucial to examine the experiences of various migrant groups and the efficacy of various policies and interventions. Informed by these examinations, policymakers can then develop legal frameworks that facilitate labour migration and contribute to sustainable economic development in the UAE and the UK.

Keywords: Nationality Law, Labor Migration, Kafala System

Introduction

The rapid urbanisation and industrialisation of the nineteenth century propelled thousands to journey over vast distances, even traversing continents, in pursuit of greater economic opportunity (Engbersen & Snel, 2013). Today, this economically-driven mobility remains a cornerstone of our globalised world. Migration has become an increasingly critical issue, with people moving to foreign countries in search of better employment prospects and living standards (Bertocchi and Strozzi, 2005, Baubock, 2011). Thus, the fields of nationality law and labour migration have assumed profound significance, with substantial influence over the economies and societies of nations worldwide (Barbero, 2012).

¹ Cassadee Orinthia Yan, Maslow Quest Foundation, c@mq.org

In light of this, this paper aims to provide a comparative analysis of the legal frameworks and economic outcomes of nationality laws and labour migration in two countries: United Arab Emirates (UAE) and the United Kingdom (UK). Both of these countries have significant populations of migrant workers, yet their respective legal frameworks for nationality and migration exhibit striking disparities. Despite having a large population of foreign workers that form approximately 88% of the entire population, UAE continues to uphold relatively exclusive nationality laws, necessitating, for example, a 30-year period of continuous and lawful residency as a prerequisite for non-Arab naturalisation. In stark contrast, the UK's citizenship laws have undergone evolutionary transformations driven by historical shifts, leading to an expansion of British nationality and a broader definition of citizenship. An illustrative example is the British Nationality Act of 1948, which established a novel form of British citizenship, extending to nearly all individuals who were not citizens of independent nations (Ashcroft, 2018). Although the UK's nationality laws represent a more open legal framework than UAE with regard to nationality and migration, it remains constrained by its own historical legacies, notably its imperialist and colonial past, which has left a lasting imprint (Bertocci and Strozzi, 2005).

This paper explores the legal frameworks surrounding nationality and migration in both the UAE and the UK, examining the rights and protections afforded to migrant workers, and the economic outcomes of labour migration in both countries. This encompasses the impact on the labour market, wages, and productivity.

Background and Context of the Study

The overlap of migration laws and nationality regulations has emerged as a battleground in contemporary politics and policymaking, fundamentally shaping international and domestic demographic management. On one hand, nationality law delineates the boundaries between those who formally belong to a nation state as citizens, and those who do not, the latter of whom cast as “aliens” (Midtbøen, 2018). On the other hand, those who are defined as “aliens” are subjected to the stringent regulations of migration law. Although many have argued that migration law is more significant than nationality law in determining naturalisation, as the precise criteria for permanent residency often present the most substantial hurdle to full polity membership (Rubenstein, 2003), a generalised conclusion on their relative importance proves elusive. Nevertheless, it is evident that both nationality and migration laws are grappling with mounting challenges emanating from globalisation and increased international economic integration, which has led to an increase in the movement of people across borders.

Immigration laws serve as a linchpin of nation-state sovereignty, enabling nations to define their identity by specifying who can enter, who must depart and who is eligible for membership (Armenta, 2017). Moreover, the legal framework encompassing migration and nationality is arguably also a framework for human capital management, guiding the stewardship of a nation's most important strategic asset – its human resources. Given the diverse legal principles, cultural contexts and historical backgrounds upon which different countries have built their migration and nationality laws, these legal frameworks exhibit substantial divergence across nations. Consequently, the economic ramifications of labour migration can also vary significantly depending on the legal context in which it unfolds (Barbero, 2012).

This study hones in on the UAE and the UK as two compelling case studies that together offer a lens through which to scrutinise the relationship between nationality law, labour migration, and economic outcomes. Following the Second World War, the UK has seen an influx of immigration that has radically altered its demographic landscape. What was once a predominantly white, ethnically British, and Christian population has transformed into

one made up of various creeds, cultures, and communities from around the world (Ashcroft, 2018). Conversely, immigration to the countries of the Gulf Cooperation Council, such as the UAE, is predominantly transient, with only foreigners eligible for citizenship (Naufal, 2016). Comparing the UAE and the UK presents a valuable opportunity to dissect the influence of nationality laws and labour migration on economic outcomes, given the disparities in legal systems and economic trajectories between the two nations (Bertocchi and Strozzi, 2005).

This study endeavours to provide a comprehensive exploration of the complex interplay between nationality law, labour migration, and economic outcomes. To unravel this complexity, the study closely examines the legal frameworks governing nationality and migration in two countries, alongside the economic outcomes wrought by labour migration (Guild, 2017). The insights gleaned from this research hold implications for policymakers, migrant workers, and other nations tackling issues associated with labour migration and nationality laws, including the UAE, the UK, and beyond.

By undertaking a comparative analysis of the UK and the United Arab Emirates, this study aims to assess both the commonalities and distinctions within their legal and economic systems. This comparative lens assists in identifying factors influencing laws relating to nationality, restrictions on labour movement, and financial implications. For policymakers in government, educational institutions, and migration management, these legal frameworks serve as the foundations on which to build effective immigration policies. This study delves into the intricacies of nationality acquisition, naturalisation processes, visa policies, work authorizations, and labour mobility regulations in both the UK and the UAE, offering vital insights to those seeking to enhance their economic standing and workforce dynamics.

The information aids in identifying both challenges and opportunities for workforce movement management. The policy implications derived from this research stand to exert a transformative impact on policy formulation and refinement in both nations. Informed decision-making, grounded in empirical data, empowers policymakers to enhance workforce governance, all while taking into account the societal and economic ramifications of their choices. Furthermore, the findings of the study can influence the development of international models and policies governing employee mobility, enriching global discourse on practical measures. By addressing the shortcomings and restrictions of prior research, this paper contributes to the growing body of literature on labour migration and nationality laws.

It is important to note that this study confines its scope to two specific case studies, namely the UAE and the UK. Given this limited sample size, the conclusions drawn are likely to be case-specific rather than universally applicable generalisations. Also, the research will not extend into the realm of the social and cultural aspects of migration. Instead, our primary focus centres on the meticulous analysis of legal frameworks, the economic impacts of labour migration, and nationality laws.

Literature Review

Definition and concept of nationality law and labour migration: Nationality Laws

Nationality law constitutes a legal framework that delineates the prerequisites and circumstances for obtaining, retaining, and losing citizenship or nationality in a specific country. Nationality and citizenship are often used interchangeably, although citizenship predominantly finds application within the domestic context, whereas the term nationality assumes greater prominence in the realm of legal membership in international law (Rubenstein, 2007). The laws governing an individual's legal and political identity

determine their relationship to the state and their rights and obligations as citizens or nationals. As De Groot (2012) asserts, nationality law is concerned with determining who is regarded as a national or citizen of a specific state, alongside the rights and responsibilities that status confers. Its purview spans a wide spectrum, including naturalisation, birthright citizenship, dual citizenship, and losing citizenship. Juss (1994) further underscores the significance of nationality law by highlighting its close connection with sovereignty and the idea of exclusive domestic jurisdiction. In light of this, Sredanovic (2020) posits that nationality law can also contribute to inequality and discrimination, particularly when it leads to the exclusion of certain groups from citizenship or subject them to arduous processes for obtaining it. For instance, the Dominican Republic's 2013 ruling retroactively stripped thousands of people, primarily of Haitian descent, of their Dominican nationality, rendering them stateless. This example starkly illustrates how nationality laws can be weaponized to marginalise specific ethnic or racial groups. Nationality law also intersects significantly with labour migration. Migrant workers often face a different set of rules when it comes to acquiring citizenship. For instance, in countries like the United Arab Emirates, the kafala (sponsorship) system ties a migrant worker's legal status to their employer, making it virtually impossible for migrant workers to obtain Emirati citizenship. This system starkly contrasts with the U.S., where certain categories of employment-based visas can eventually lead to permanent resident status and citizenship. The disparities in these systems highlight the varying approaches to labour migration and nationality law around the world, and how they can either facilitate or hinder a migrant worker's path to citizenship.

Definition and concept of nationality law and labour migration: Labor Migration

Labour migration is a phenomenon characterised by the movement of individuals across national borders in search of employment. It serves as a conduit for the transfer of human capital from one's country of origin to a destination nation, with the overarching goal of augmenting economic prospects for both migrants and the host country. According to Dauvergne and Marsden (2014), what began as temporary labour migration has burgeoned in popularity within the post-global era, emerging as a favoured strategy for employers seeking a flexible and cost-effective workforce. Short-term contracts and seasonal employment are typical in this type of migration, and after the employment period is over, workers return to their home nations. The New Economics of Labor Migration (NELM) theory, as articulated by Stark and Bloom in 1985, posits that migration represents a rational choice made by those aiming to maximise their earnings and bolster their economic prospects. This perspective emphasises the interplay of diverse factors – economic, social, and political – including wage disparities, employment opportunities, and political instability, as the driving forces behind migration. Some scholars, such as Taylor (1999), have questioned the universality of NELM, arguing that it may not account for forced or involuntary migrations that are driven by political or environmental crises rather than economic rationality. Goss and Lindquist (1995) contrastingly present a "structuration" perspective on labour migration that recognizes the social structures and power relations which shape the migration process. Here, the role of social networks, institutions, and policies in promoting or preventing labour migration is emphasised.

Overview of the legal frameworks in the UAE and UK: Legal Framework in the UAE

The legal system of the United Arab Emirates (UAE) is characterised by a civil law system with pronounced influences from Islamic law, or Sharia. To satisfy the demands of its rapidly expanding economy and global commercial ties, the UAE's legal system has experienced tremendous development and modernization. At its core, this legal system rests on the foundation of federal laws enacted by the central government, complemented by laws promulgated by the individual Emirates, including Abu Dhabi, Dubai, Sharjah, and others, within their respective regions, as long as these laws do not conflict with federal legislation.

Islamic law, or Sharia, holds considerable sway within the UAE's legal system, particularly in matters pertaining to personal status, family law, and inheritance. Federal and local laws incorporate Sharia principles, and Islamic courts coexist with civil courts to hear cases governed by civil law. Sharia courts, in particular, specialise in matters related to inheritance, marriage, divorce and familial disputes.

To support its vibrant business ecosystem, the UAE's legal system is also fortified with robust commercial law provisions. Federal laws that regulate many areas of commercial activity, such as contracts, the sale of commodities, banking, and company law, govern commercial transactions. A noteworthy example of this legislation is the UAE Commercial Transactions Law. Individual Emirates possess the authority to enact their own commercial legislation to further streamline corporate procedures.

Recognizing the importance of fostering a conducive environment for online commercial arbitration, the UAE has taken substantial strides in establishing a strong legal framework for this purpose. The UAE Federal Arbitration Law, which is based on the UNCITRAL Model Law on International Commercial Arbitration, forms the backbone of this framework. The legislation provides a comprehensive framework for conducting arbitration proceedings, upholding arbitral awards, and choosing arbitrators. Given that it enables parties to resolve disputes swiftly and securely over the internet, online business arbitration is gaining traction (Dahiyat, 2017).

The UAE has prioritised the enhancement of safety and the safeguarding of public health through a comprehensive legal framework encompassing strategic initiatives. Within this framework, various legislations have been enacted, encompassing diverse aspects of safety, including public health, product safety, workplace safety, and traffic safety. These legislations serve as the bedrock for setting safety standards, establishing regulatory bodies, and implementing enforcement mechanisms to ensure stringent adherence to safety protocols (Grivna et al., 2012). The direct result of efforts to improve safety is the establishment of organisations to oversee the formulation of safety standards and the enforcement thereof. Prominent among these entities are the UAE Federal Traffic Council and the Emirates Authority for Standardisation and Metrology.

Overview of the legal frameworks in the UAE and UK: Legal Framework in UK

The legal landscape of the United Kingdom (UK) comprises statutory law, case law, and constitutional principles, collectively underpinning the common law system that serves as its bedrock. A defining characteristic of the UK's legal system is the notion of parliamentary sovereignty, which holds that the UK Parliament holds ultimate authority to enact laws and effect systemic changes. Legislation enacted by Parliament as statutes is a crucial component of the legal system. Acts of Parliament, or statutes, provide the legal infrastructure for numerous sectors, including immigration, employment, contract law, criminal law, and more.

The UK's legal system draws heavily upon case law, wherein decisions rendered by higher courts serve as precedents by which subordinate courts must abide. This adherence to precedent, encapsulated in the doctrine of *stare decisis*, fosters consistency and predictability in legal rulings. Notably, rulings from the UK Supreme Court and Court of Appeal, and in some instances, judgments from the European Court of Justice, exert substantial influence over the interpretation and application of the law. The UK's legal system has changed over time with regard to labour migration, especially in response to the country's membership in the European Union (EU) and changes in EU labour migration regulations. The UK's legislation and policies governing labour migration have been impacted by the EU's principles of non-discrimination and free movement of workers (Guild, 2017). However, the landscape is currently undergoing substantial transformation

as new laws and agreements are formulated in the wake of the UK's decision to leave the EU.

The trajectory of British immigration politics is distinctive, notably characterised by a prolonged endeavour to regulate and curtail immigration, not of "aliens" or "foreigners," but of individuals hailing from the vast British Empire – a populace numbering approximately 800 million who have been effectively granted the status of British nationals (Cerna & Wietholtz, 2011). Liberal immigration policies allowed unrestricted access from the colonies and the Commonwealth until 1962 (Cerna & Wietholtz, 2011). To fill labour shortages, the government introduced schemes such as the European Volunteer Workers (EVW) Programme (Cerna & Wietholtz, 2011). Presently, the UK has enacted a number of laws and policies to attract and retain highly skilled immigrants with advanced training and credentials. According to Wiesbrock and Hercog (2010), the legal framework governing highly skilled migration includes visa types, eligibility conditions, sponsorship requirements, and entrance and settlement procedures. A notable component of this regulatory apparatus is the UK's points-based immigration system, implemented in 2008, which places paramount importance on factors including skills, qualifications, and job offers. The courts and tribunals that make up the English legal system each have their own unique areas of jurisdiction. The Supreme Court, Court of Appeals, High Court, and lower courts – including County Courts and Magistrates' Courts – are all included in the judicial hierarchy. These institutions collectively uphold the principles of access to justice and the rule of law, presiding over a wide spectrum of legal matters, encompassing both civil and criminal cases (Slapper and Kelly, 2014).

The UK's legal system is in a perpetual state of evolution, continually shaped by a confluence of domestic and global causes. A prime example of this dynamism is the implementation of novel immigration regulations and policies in the aftermath of the UK's departure from the EU. This consequential development exerts a palpable influence on labour migration dynamics and the rights of EU nationals residing in the UK. Additionally, the UK's legal system is underpinned by a commitment to safeguarding fundamental rights and freedoms, a commitment enshrined in human rights legislation such as the Human Rights Act of 1998.

Economic outcomes of labour migration in the UAE and UK

The economic repercussions of labour migration hold profound significance for both the United Arab Emirates (UAE) and the United Kingdom (UK). In the case of the UAE, labour migration has emerged as a pivotal catalyst of economic development, marked by a substantial influx of foreign workers. This phenomenon, particularly pronounced in sectors such as construction, hospitality, and domestic services, has been critical to the UAE's accelerated economic growth. Foreign employees frequently fill jobs that local people are less likely to accept or for which they lack the appropriate qualifications. Key industries and infrastructure projects in the UAE have grown as a result (Hervé and Arslan, 2017).

Positive economic outcomes for the UAE include heightened productivity, with migrants contributing diverse skills and expertise. Migrant workers, notably from South Asian countries, have played a key role in the UAE's massive infrastructure projects, contributing to a GDP growth rate of 3.7% in 2019. Nevertheless, the UAE's restrictive nationality laws, which generally prohibit migrants from becoming citizens, may limit these workers' potential contributions to economic diversification. These laws restrict the ability of migrants to start businesses, buy property, or invest in local markets, thereby potentially limiting the full economic benefits of this workforce (Bauer et al., 2004).

Labor migration has facilitated the transfer of information and technology in the UAE, contributing to economic diversification. For instance, skilled migrants in finance and

healthcare have brought global best practices to the UAE, enhancing the competitiveness of these sectors. However, the stringent nationality laws limit the extent of this knowledge transfer, as these laws often result in a high turnover of expatriate professionals, preventing long-term establishment and deeper integration into the UAE's economy (Hervé and Arslan, 2017).

Labour migration has also exerted a profound influence on the UK's economy, yielding both positive and negative repercussions. The influx of migrant workers has filled gaps in the domestic workforce and addressed labour shortages in specific industries and areas. Migrant workers, who constituted about 17% of the UK's workforce in 2020, have filled gaps in the domestic labour force, particularly in sectors like healthcare, where 13.1% of workers are international migrants (Doherty et al., 2014). For instance, migrant workers are crucial to supplying the labour demand in the construction, hospitality, and healthcare industries (Doherty et al., 2014).

The UK Migration Advisory Committee found that EEA migrants contributed £2,300 more to the public purse than the typical adult, demonstrating their significant economic impact. The UK's points-based immigration system attracts qualified employees and gives migrants greater legal independence than the UAE. This system has caused income discrepancies, job rivalry with local employees, and social integration issues for migrants, despite their high skill levels (Doherty et al., 2014).

The benefits of labour migration in the UK include economic expansion through the deepening and widening of the labour pool as a whole, enhancing output, and bridging important skill shortages. Migrant workers frequently accept jobs where there may be a lack of competent personnel or in cases where locals may be unwilling to accept them. By ensuring the availability of necessary labour, migrant workers help important economic sectors such as healthcare, construction, and agriculture (Bauer et al., 2004). Also, laws and regulations can have effects on restricting migrants' movement and labour market negotiating power, the UAE's kafala system is widely blamed for hindering their economic integration. The UK's points-based system, although more open, sometimes ignores industry demands, which might lead to labour shortages in less-skilled but vital areas (Bauer et al., 2004).

Moreover, labour migration in the UK fosters an environment conducive to innovation and entrepreneurship. Migrant workers bring with them a diverse range of experiences, ideas, and perspectives, which can catalyse the establishment of new companies and the adoption of cutting-edge procedures. In this sense, these workers not only bolster economic competitiveness but also inject vitality into the labour market (Doherty et al., 2014).

However, there are also challenges associated with labour migration in the UK. Domestic workers' pay and employment prospects may be affected, especially in industries with substantial migrant worker concentrations. In some occupations, the presence of migrant workers may result in salary discrepancies and intensified job competitiveness, with variations across sectors and geographic areas (Simionescu et al., 2017). The efficacy of regulatory measures, the skill level of migrants, and their successful integration into the labour market all influence the extent to which labour migration shapes the economy. Maximising the economic benefits of labour migration necessitates optimising the utilisation of migrant workers' skills and facilitating their seamless integration into the broader economic landscape (Bauer et al., 2004).

Comparison of legal frameworks of labour migration in the UAE and UK

According to Jamal (2015), Thiollet (2011), and Ruhs (2018), the legislative frameworks for labour migration in the UAE and the UK are marked by distinct characteristics.

In the UAE, the central regulatory framework for labour migration is the kafala system, which links a migrant worker's legal status to their sponsoring company or employer. This system bestows significant authority and accountability upon employers, encompassing crucial facets of employment such as visa sponsorship, work authorization, and residency. However, it has been a subject of criticism due to its potential to facilitate labour exploitation, restrict worker mobility, and engender power imbalances between employers and employees (Jamal, 2015). As such, in 2016, the UAE implemented sweeping reforms to their kafala. These reforms introduced several significant changes, including provisions allowing most migrant workers to seek alternative employment once their contract concludes, permitting mutual agreement between workers and their employers to terminate their contract without penalty, and enabling workers to unilaterally decide to terminate their contract as long as they comply with the legal requirements of early termination, including providing one month's notice. It is noteworthy that domestic workers were excluded from these reforms (Parreñas, 2017).

On the other hand, the legal system governing labour migration in the UK follows a more decentralised and rule-based approach. Immigration rules, which define visa types, eligibility requirements, and rights of migrant workers, are central to the system. The UK's legislature is firmly grounded in protecting individual rights, preventing discrimination, and ensuring equitable treatment of migrant workers. Migrants are categorised according to the points-based system, based on categories such as talents, qualifications, and sponsorship. According to Ruhs (2018), this method seeks to manage the influx of migrant labour while attracting highly skilled professionals.

Comparison of economic outcomes of labour migration in the UAE and UK

According to Hervé and Arslan (2017), Doherty et al. (2014), Bauer et al. (2004), and Simionescu et al. (2017), the economic ramifications of labour migration in the UAE and the UK exhibit both similarities and differences.

In the UAE, labour migration has been essential in fostering the nation's swift economic growth. Important industries including construction, hospitality, and domestic services benefit from the labour of migrant workers, which advances infrastructure development and overall economic expansion. Their presence bridges labour gaps, boosts productivity, and facilitates the transfer of knowledge. However, concerns have arisen regarding the working conditions and treatment of these migrant workers, including issues such as poor pay, restricted rights, and insufficient social support (Hervé and Arslan, 2017).

Likewise, labour migration has significantly boosted the economy of the UK. Migrant workers fill skill gaps in the workforce, especially in industries like construction, agriculture, and healthcare, ensuring the delivery of important services and promoting economic growth. They increase productivity and competitiveness by bringing a variety of talents, creativity, and entrepreneurship. Nevertheless, challenges persist in the form of salary disparities, intensified employment competition, and limited social integration (Doherty et al., 2014).

There are significant disparities between the legal systems and economic effects of labour migration between the UK and the UAE. Under the kafala system, the UAE's legal status is linked to employers, whereas the UK's immigration policy is contrastingly governed by shared regulatory standards. The efficacy of regulatory frameworks, the skill levels of migrant workers, and the depth of their integration into the labour market collectively influence the economic ramifications of labour migration. Both nations must thus proactively address various issues to fully harness the economic benefits of labour migration. This entails ensuring fair salaries, protecting workers' rights, fostering social integration, and allowing talent matching (Bauer et al., 2004).

Theoretical Frameworks:

This section presents an in-depth exploration of the theoretical frameworks employed in prior research on labour migration, whilst also highlighting the limitations of these earlier studies. The conceptual framework offered by Unterreiner and Weinar (2014) in the INTERACT project and Castles' (2009) observations on migration and development will serve as the theoretical foundation for this study. The conceptual foundation for the INTERACT project is founded on the notion that the interplay between nationality law and economic outcomes can be comprehensively understood through a legal framework that encompasses three key facets: the legal, institutional, and sociological.

Additionally, Castles' observations on the correlation between migration and development contributes to the theoretical foundation of this study (2009). Castles elucidates that this correlation is characterised by mutual reinforcement and is subject to economic, social, cultural, and political influences. This, Castles argues, demands that a holistic approach be taken towards migration and development policy that accounts for all of its various aspects.

Related Literatures

This section undertakes a comprehensive review of recent research pertaining to the legal frameworks, regulations, and financial ramifications of labour migration.

In recent years, labour migration has emerged as a topic of heightened scrutiny for scholars and policymakers, with a particular emphasis on the legal frameworks and economic impacts of labour movement. Bertocchi and Strozzi (2005), for example, examined the historical context, contemporary importance, and continuing evolution of citizenship (nationality) laws. Their study involved the collection of data dating back to the 19th century from diverse national real estate domains. Their inquiry into the formative stages of major migration waves, understood to be primarily motivated by economic incentives, underscored the limited influence of the original, exogenously imposed regulations on international migration dynamics. Evaluating the correlation between citizenship laws and the marginalisation of migrant groups, Owen (2023) and Barbero (2012) accentuate the importance of recognizing the active class of labour migrants as a potent economic force. Their paper argues that by recognizing labour migration as a driving force in the economy, there exists the potential for reforming nationality laws to enhance economic prosperity while concurrently fostering a more inclusive and equitable society.

Countries exhibit varying frameworks for integrating migrant labour into their broader economic landscapes. While some propose the idea of naturalisation (Bertocchi and Strozzi, 2005), others contend that implementing temporary migration laws can boost economic growth from the contribution of migrants to the economy (Baubock, 2011). In this broader context, countries that predominantly follow permanent migration policies continue to admit substantial numbers of permanent migrants, alongside a growing influx of temporary migrants. Conversely, countries primarily reliant on temporary migration have witnessed an expansion of their permanent migrant stocks through family reunification (Kritz, 1987).

It is argued that the adoption of flexible and sustainable frameworks within nationality laws, accommodating labour migration, offers a unique vantage point from which to assess the performance implications of existing legal structures that either facilitate or impede economic outcomes. In the same vein, echoing the imperative of naturalising the labour migrants through reformed and inclusive nationality laws, Kaur (2014) argues that nationality law reforms must consider the interests of all parties involved, including immigrants, frequently moving from one country to another in pursuit of a better working environment. The study emphasises the value of regulatory frameworks in safeguarding migrant workers' rights and fostering their social and economic integration.

According to Barbero (2012), the revision and expansion of nationality laws to accommodate labour migrants and the provision of an all-inclusive legal framework which protects the rights and privileges of immigrants is a promising prospect. Such possibility for naturalisation in nationality law remains a pressing concern for many labour migrations. As Faist (2016) elucidates, while citizenship may not be a universally sought or necessary goal for all migrants in the host country, it continues to hold relevance for migrants from developing nations aspiring to acquire citizenship in developed countries. The acquisition of citizenship is beyond a signification of the right to permanent settlement in a country. As Rubenstein (2003) argues, citizenship remains an important line of demarcation when it comes to political participation. He further argues that the desire to become formal political participants is one of the most powerful motives for immigrants to naturalise. This overarching theme reinforces the fundamental premise of the study at hand, which strives to underscore, through a comparative assessment, the impact of nationality laws and labour migration on the economic growth and development trajectories of the UAE and the UK.

Gaps and Limitations in the Existing Literature

Despite the substantial body of literature on the intersection of legal frameworks and the economic consequences of labour migration, there remains a dearth of comparative study of nationality laws and labour migration across different nations. There is also a notable scarcity of case studies that offer a rigorous investigation of the legal systems and financial impacts of labour migration in given nations. Therefore, this study seeks to shed light on the deficiencies of the existing literature on the nationality laws and the economic effects of labour migration in two distinct case studies. Understanding the global and domestic impacts of migration requires an understanding of the legal systems in place and the economic results of labour migration. A comparative analysis of nationality laws and labour migration across nations, as well as distinct yet comparable case studies, are nonetheless lacking in the literature. This study intends to fill this gap by comparing nationality laws in the selected study domains and undertaking a thorough scholarly exploration of the influence of these nationality laws on labour migration and the resultant economic consequences.

Methodology

This study proceeds with a hybrid methodology, combining quantitative and qualitative approaches, for data collection and analysis techniques to evaluate the complex interplay between nationality laws and labour migration and their effects on economic outcomes.

Research Design

The research design entails a rigorous analysis of documentation pertaining to labour migration and the economic consequences stemming from nationality laws in both the UAE and the UK. A comparative approach will be adopted in order to comprehensively examine the connections between nationality laws, labour migration and their corresponding economic effects.

An analysis of case studies from the UAE and the UK will form the study's qualitative component, whilst the analysis of the economic growth dynamics due to reforms in nationality laws will form the complementary quantitative component of the study. By adopting this research philosophy, the study aspires to facilitate a more profound comprehension of the legal frameworks and economic repercussions associated with labour migration in both the UAE and the UK.

Data Collection Methods

This study adopts a desk review of literature and provides an extant review of prior research and analysis from secondary sources, including but not limited to the World Bank and International Labour Organization.

Sample Selection

This study assesses the various legislative frameworks and nationality laws associated with labour migration in the UAE and the UK for the study's qualitative component. On the quantitative side, the study will measure the impact of nationality law reforms towards labour migration in the UAE and UK. The choice of the UAE and UK as case studies was predicated not only on their comparable legal systems and levels of economic development, but also on the shared and continuous increase in each country's immigration rate.

Data Analysis Techniques

Ordinary Least Squares (OLS) regression analysis techniques will be adopted to conduct a quantitative analysis of the correlation between nationality law and labour migration to economic outcomes of the UAE and UK. In this analysis, the two variables, dependent and independent variables are taken into consideration.

Dependent variable: The economic outcome, i.e., the GDP of UAE and UK from 2019 to 2022.

Independent variable: The changes in nationality laws in the UAE and UK from 2019 to 2022.

This analysis will numerically assess the relevance between the variation in the laws and the economic outcome in UAE and UK.

Legal Frameworks and Economic Outcomes

In addition to evaluating nationality laws and labour migration in the selected domains, this section will give an overview of different legal frameworks governing labour migration. We will study the effects of labour migration on the economies of various nations and the crucial role played by nationality laws in influencing both. Consequently, the paper will focus on the following key ideas.

Overview of Labor Migration Legal Frameworks

Wiesbrock and Hercog's 2010 study examines migration policies in the UK, Netherlands, and Germany, advancing an analysis of eligibility criteria, provisions for young migrants, permit validity, family migration options, and employment rights and social security provisions.

Findings

Findings	Favourable Admission Policies	European countries aim to compete with the United States in attracting highly-skilled workers.
		Efforts made to adopt more favourable admission policies for highly-skilled migrants.
		European migration policies are becoming increasingly attractive compared to the US H-1B visa.
	Provisions for Young Migrants	The adoption of specific policies by EU Member States in favour of recent graduates and young immigrants.
		Highly skilled migrant spouses are permitted to begin working right away.

	and Former Students	Citizenship and permanent residency requirements are largely the same across EU countries.
	Eligibility Criteria	US employment-based approach using flexible criteria based on employment in a specialty occupation.
		EU countries have fixed minimum salary level requirements.
		US eligibility criteria offer certain advantages compared to EU requirements.
	The "Blue Card" Directive	EU directive which aims to synchronise rules on highly-skilled migration.
		Provides opportunities for mobility within the EU.
		Limitations of the directive include the absence of provisions for young migrants and former students.
Conclusion	EU Member States have made progress in adopting favourable admission policies for highly-skilled migrants.	
	Challenges remain, such as the perception of the EU as a "fortress Europe" and the fragmentation of the labour market.	
	Further improvements can enhance the attractiveness of EU and national labour migration policies for highly-skilled migrants.	

The "United Arab Emirates' Legal Framework of Migration" explanatory note provides insights into the legal frameworks governing migration in the UAE (Gulf Labour Markets and Migration, 2017).

Changes in sponsorship transfer: One of the significant changes in the UAE's government regulations is associated with sponsorship transfers. In 2015, the implementation of new ministerial resolutions marked a pivotal shift, allowing employees to change employers without the requirement of a No-Objection Certificate (NOC) under particular salary circumstances.

Labour-related laws and regulations: This encompasses a broad spectrum of federal laws and Emirate-specific regulations, all aimed at ensuring fair treatment and safeguarding the rights of workers within the employment landscape. These legal frameworks govern aspects including employment contracts, compensation, working hours, and leave policies.

Safety precautions: Measures have been introduced by the United Arab Emirates to protect the well-being of workers. For instance, a lunchtime break for workers in the construction and outdoor industries was implemented in 2005 to reduce workplace industries. The Wage Protection System (WPS), introduced in 2009, addresses the issue of non-remittance of compensations among private businesses.

Health insurance: Employers in the UAE are obligated to provide insurance coverage for health for their workforce and their families. Foreign workers residing in Dubai receive company-sponsored health insurance plans. There are exceptions for specific groups including educators, clerics, and transportation operators in learning institutions.

Bilateral agreements: The UAE and other nations have signed bilateral agreements to promote workforce mobility and collaborative efforts in the workforce, involving Nepal, the Philippines, Indonesia, India, Pakistan, and Bangladesh.

In summation, the Emirates has actively modified its legal framework, signalling a commitment to improve its migration legal system. The implementation of diverse labour-related legislations underscores this commitment, while bilateral agreements are also compelling evidence of the UAE's dedication to fostering cooperation and facilitating labour movement between the Emirates and partner nations.

Comparative Analysis of Nationality Laws in selected in the UAE and UK

Aspect	UAE	UK
Citizenship Acquisition	Primarily based on descent (jus sanguinis) (Alsabeehg&Kuzmova, 2022)	Combination of descent (jus sanguinis) and birthplace (jus soli) ("British Nationality Act 1981," 2010)
Automatic Citizenship for Children of Citizens	Yes, for children born to UAE citizens (Alsabeehg&Kuzmova, 2022)	Yes, for children born to married British citizen parents ("British Nationality Act 1981," 2010)
Residence Requirement for Naturalization	Minimum of 10 years' residence (Alsabeehg&Kuzmova, 2022)	Minimum of 5 years' residence ("British Nationality Act 1981," 2010)
Language Requirement for Naturalization	Proficiency in Arabic language (Alsabeehg&Kuzmova, 2022)	Proficiency in English language ("British Nationality Act 1981," 2010)
Citizenship Test Requirement	Yes	Yes
Good Character Requirement for Naturalization	Yes	Yes
Emphasis on Cultural Understanding in Application	Yes	Yes
Stateless Children	Eligible for registration of stateless children	Eligible for registration of stateless children

Table 1: Report on Citizenship Law: United Arab Emirates and United Kingdom

Evaluating the effects of labour Migration on the economy of the UAE and UK

UAE:

Economic Growth: Workforce migration has been instrumental in the financial development of the UAE. Migrants have contributed to areas such as building, petroleum and natural gas, financial, and hotel industries. Those individuals have facilitated economic growth and expansion (Malit Jr & Youha, 2013).

Job Creation: Foreign labourers have contributed to the creation of work opportunities in the UAE by meeting workforce demands and facilitating the growth of sectors. They have also been instrumental in the growth of commercial organisations and the collective financial system (Malit Jr & Youha, 2013).

Remittances: Expatriate workers in the UAE commonly send funds to their home countries. This practice can have positive effects on the fiscal conditions of these regions by providing financial support to families and contributing to the local economy's development (Malit Jr & Youha, 2013).

Skills Transfer and Knowledge Exchange: Skilled migrant workers, particularly those with expertise in fields such as finance and technology, bring valuable skills and expertise to the UAE. This plays a vital role in the advancement and expansion of these sectors, together with the entire economy of the nation. The exchange of knowledge can contribute to the development of domestic capabilities and enhance the competitiveness of the UAE's economic landscape (Malit Jr & Youha, 2013).

Consumption and Services: Migrant workers stimulate local spending and boost the service industry by using their income to purchase goods and services within the UAE. This fosters commercial transactions and supports local businesses (Malit Jr & Youha, 2013).

UK:

Economic Growth: Labour migration has made a substantial contribution to the economic development of the UK. Foreign employees have filled workforce gaps, particularly in sectors such as healthcare, construction, hospitality, and information technology. These employees assist in expanding businesses and bolstering the nation's total economic production (Vargas-Silva & Sumption, 2023).

Innovation and Entrepreneurship: Immigrant employees in the UK are more inclined to start their own businesses compared to native citizens. This highlights the entrepreneurial spirit and determination that many immigrants bring to their adopted nation. The activities of these entrepreneurs create opportunities for job creation, stimulate innovation, and promote economic vitality (Vargas-Silva & Sumption, 2023).

Tax Contributions: Migrant workers in the UK contribute to tax revenues through income tax and other forms of taxation, which support public services and infrastructure development (Vargas-Silva & Sumption, 2023).

Support for Demographics: The UK faces a number of demographic issues, including an ageing population and a declining birth rate. In industries experiencing labour shortages, immigrants frequently fill open positions, ensuring the continued provision of essential services (Vargas-Silva & Sumption, 2023).

Cultural Diversity and Social Contributions: The diverse culture resulting from immigration adds variety to the UK, which is an essential element for inclusion and promotes diversity within the labour market (Vargas-Silva & Sumption, 2023).

Legal Frameworks of Nationality Law and Labor Migration in the UAE and UK

Aspect	UAE	UK
Sponsorship Transfer	Introduced changes in 2015 allowing employees to transfer to another employer without an NOC under certain salary conditions	No specific provision for transfer of sponsorship; generally, employees require employer's consent for changing jobs
Labor Laws	UAE Labour Law governs employment for nationals and non-nationals, covering contracts, wages, working hours, and leave	Comprehensive labor laws covering various aspects of employment, including contracts, wages, working hours, leave, and employee rights
Health Insurance	Employers required to provide health insurance coverage for employees and their family members; coverage varies across emirates	Comprehensive healthcare system, including the National Health Service (NHS) providing healthcare coverage to UK residents
Labor Protection	Introduced measures such as mid-day break for construction and outdoor workers, and the Wage Protection System (WPS) to address non-payment of salaries	Robust labor protection laws and regulations, including minimum wage legislation, worker safety regulations, and protection against unfair dismissal
Bilateral Agreements	Signed bilateral agreements with countries like Nepal, the Philippines, Indonesia, India, Pakistan, and Bangladesh for labor cooperation and manpower exchange	Extensive network of bilateral agreements with countries worldwide, facilitating labor migration and cooperation
Citizenship and Nationality	Strict requirements for citizenship; nationality laws mainly apply to Emirati citizens	Well-established citizenship laws and regulations providing a pathway to citizenship for eligible individuals based on criteria such as birth, descent, or length of residence

Freedom of Movement	Citizens enjoy freedom of movement within the country as guaranteed by the Constitution	Citizens enjoy freedom of movement within the UK and the European Union (prior to Brexit), with certain restrictions on non-citizens
Human Trafficking	Laws and regulations criminalize human trafficking; penalties include imprisonment	Comprehensive legislation to combat human trafficking, including criminalizing offenses and providing support and protection for victims
Legal References	Various federal laws and ministerial decisions govern migration; UAE Labour Law is a key reference	Comprehensive legal framework, including immigration laws, employment legislation, and international treaties

Table 2: Temporary labour migration to United Arab Emirates and United Kingdom

Overview of nationality law in the UAE and UK

UK

The Nationality and Borders Act 2022 introduced new regulations regarding the eligibility for British passports. These regulations include stricter criteria for the process of becoming a national and more severe punishments for illicit immigration. The immigration system now relies on a points-based approach that prioritises individuals with specific skills and the potential to enhance the UK economy. To qualify for a visa, prospective applicants must meet specific scoring criteria based on their competencies, educational qualifications, and English language proficiency (“Nationality and Borders Act 2022,” 2022). During the year 2020, the 2003 Regulations were amended to allow a child of a migrant settled in the UK to meet the UK requirements for nationality acquisition if their parent no longer holds settled status. This is provided the child arrived before the age 18 and has lived in the UK continuously since their arrival (British Nationality (General) (Amendment) 2020). However, there are exceptions that may apply under certain conditions. The updated regulations also empower authorities to deport foreign residents who have committed serious crimes or pose a threat to national security, with modifications made in 2021 to facilitate these deportations (Migration Observatory, 2022).

UAE

Starting in 2020, a new suite of immigration and nationality legislations have been put into effect in the UAE. These changes have opened up the possibility of acquiring nationality for non-citizens engaged in investments, professional occupations, and specialised talents (Errichiello&Nyhagen, 2021). In 2021, the Golden Visa initiative was introduced, allowing non-citizens to obtain an extendable decade-long visa provided they fulfil criteria related to investment or business (Nadkarni & Haider, 2022). Further reforms occurred in 2022, when the UAE government relaxed citizenship requirements for women who marry Emirati men, as well as for offspring of Emirati parents from other countries (Lari, 2022). The recent guidelines aim to promote inclusion and equal opportunity within the nation's naturalisation laws (Lari, 2022). Women who wed Emirati men are now able to transfer their national identity to their descendants, regardless of the nationality of their father. Offspring of Emirati mothers and non-Emirati fathers can also be granted nationality of the UAE provided they fulfil specific criteria (Lari, 2022). However, the largest proportion of labour migrants in the UAE are critically poor, temporary, low-skilled labour migrants from countries in Southeast Asia (Valenta et al, 2017). The different routes to citizenship opened under the recent reforms are inaccessible to most and the nationality laws remain highly restrictive. Indeed, all labour migrants in the UAE are considered temporary migrants as they cannot obtain a formal right to permanent settlement or UAE citizenship.

Case Studies

To examine the legal frameworks and economic effects of labour migration, the study will now examine two case studies from UAE and the UK. We will perform a qualitative and quantitative examination of the chosen nations, looking at their nationality laws and legal frameworks in relation to labour migration, and how this legislation impacts the country's economic performance. In order to find patterns and distinctions in the legal systems and the financial effects of labour migration, a comparative analysis will be advanced.

The UAE has undergone substantial revisions to its labour laws and regulations. In February 2022, the newly enacted Labour Law introduced changes to work models, probation, family leave, discrimination laws, termination of employment, and end of service entitlements. One notable change is the discontinuation of unlimited-term contracts, leaving fixed-term contracts as the sole option available. The UAE also introduced new immigration policies enforcing visitor and immigration visa frameworks, organised entry visas and split residence permits based on the purpose of stay. Additionally, the Wage Protection System (WPS) was enhanced to guarantee punctual salary disbursement, with compliance being mandatory for organisations registered with the Ministry of Human Capital and Emiratisation (MOHCE)(Clyde & Co, 2023).

Efforts towards nationalisation have been intensified, incorporating targets for the employment of UAE citizens and penalties for non-adherence. A range of different resolutions and decisions have been issued to regulate Emiratisation and to impose fines for violations. Moreover, the UAE has introduced regulation pertaining to the rights of domestic workers, workplace harm, job-induced conditions, and employer mandates. Significant upcoming changes include heightened Emiratisation quotas, mandatory unemployment insurance, and the transition from open-ended term contracts to fixed term contracts, which must be completed no later than February 2023. These modifications are designed to enhance employment opportunities for citizens of the UAE and provide increased job security for employees (Clyde & Co, 2023).

Examining the United Kingdom's job market with a focus on international individuals reveals multiple significant insights. Foreign men exhibit higher employment levels in comparison to British men. Foreign women, conversely, are not as inclined to be employed as women from the UK. Women born in other countries, specifically those originating from Pakistan and other South Asian nations, encounter higher unemployment rates than women who are native to the UK (Fernández-Reino&Rienzo, 2022). Nevertheless, it is important to recognize that various factors may contribute to this disparity, including language barriers and potential biases in hiring practices. During the Covid-19 pandemic, EU-born migrants experienced a temporary increase in unemployment rates, which eventually decreased. Similarly, migrants born outside the EU also saw a rise in unemployment during the pandemic. In general, foreign workers were somewhat more prevalent in low-skilled jobs as opposed to citizens born in the UK (Fernández-Reino&Rienzo, 2022).

It is important to clarify that not every migrant worker necessarily occupies a position with low skill requirements. Various factors, including health status and emotional well-being, can contribute to differences in employment among migrants. Additionally, other factors must be taken into account, including communication obstacles and bias within the employment sector. This analysis underscores the need to incorporate these elements when evaluating job market integration. Nonetheless, it should also be emphasised that the information utilised for this study pertains to the period between 2020 and 2021 and therefore may not accurately reflect the current conditions in the United Kingdom's labour market (Fernández-Reino&Rienzo, 2022).

Comparative Analysis of Legal Frameworks and Economic Outcomes in the UAE and UK
UAE: In 2022, the UAE introduced new labour laws that not only repealed existing regulations but also brought about substantial changes to job structures, probationary

periods, maternity and paternity benefits, anti-discrimination measures, employment termination procedures, and retirement benefits. These modifications have transformed the employment landscape in the UAE, affording enhanced protection and entitlements to workers. The recent statutory provisions are intended to fortify the rights and security of the country's workforce. Furthermore, the UAE has implemented emiratization regulations aimed at incentivizing the recruitment of individuals from the UAE across various industries. As stated by the report from Clyde & Co (2023), the primary objective of these laws is to expand the employment opportunities for Emirati citizens and promote their active participation in the labour market.

UK: In the UK, immigration processes are governed by a scoring system. Applicants undergo assessment based on variables including abilities, qualifications, and professional proposals. This framework includes specific regulations for a variety of fields, including agriculture and healthcare (Fernández-Reino&Rienzo, 2022).

Economic Outcomes:

UAE: Foreign workers play a pivotal role in driving growth and development in the UAE (Bealer&Bhanugopan 2013), They address labour shortages in various industries, including construction, hospitality and healthcare, and their contributions have a profound impact on the nation's various sectors. Additionally, these international labourers remit funds to their home countries, bolstering the economic and monetary stability of those nations.

UK: Similarly, the UK's economic progress is greatly impacted by international workers, especially in sectors such as healthcare, technology, and hospitality where they fill workforce gaps and bring in specialised skills. Overseas employees also stimulate consumer spending, boost tax revenues, and contribute to growth and productivity in their respective fields. Indeed, the role of migrant labour is instrumental within the country's broader economic framework (OECD, 2014).

It is crucial to acknowledge that both nations have laws and existing policies to ensure the safety and welfare of displaced workers, encompassing regulations related to workplace safety, fair wages and access to social benefits.

Comparison of legal frameworks and economic outcomes of labour migration in the UAE and UK:

		UAE	UK
Legal Frameworks	Labour Law	New Labour Law introduced in 2022	Various employment laws (e.g., Employment Rights Act)
	Immigration System	Emiratization regulations	Points-based immigration system
	Sector-specific Regulations	Labour quotas in certain sectors	Sector-specific regulations (e.g., agriculture)
	Worker Rights and Protections	Limited worker protections	Strong worker protections (e.g., minimum wage, working time directive)
Economic Outcomes	Role in Economy	Migrant workers contribute to economic growth	Migrant workers fill labor market gaps
	Remittances	Remittances sent back to home countries	Remittances sent back to home countries
	Contributions to Economy	Key roles in construction, service industries	Contributions to various sectors of the economy
	Taxes and Consumer Spending	Limited direct taxation	Migrant workers contribute through taxes and consumer spending

Social Impact	Cultural Diversity	Highly diverse expatriate population	Highly diverse immigrant population
	Integration Policies	Limited integration policies	Various integration and naturalisation policies
	Government Support and Benefits		
	Social Welfare	Limited social benefits for migrant workers	Access to certain social welfare benefits for qualified migrants
	Healthcare	Healthcare for workers varies by emirate and employer	NHS access for migrants, subject to conditions
Challenges and Criticisms	Human Rights Concerns	Criticisms related to workers' rights	Concerns related to detention and deportation practices
	Exploitation Concerns	Issues with the Kafala system (sponsorship system)	Issues related to potential exploitation of low-skilled workers

Table 3: A Comparative Analysis of Nationality Laws in the MENA Region (van Waas, 2014)

Outlined below are the key factors affecting the legal frameworks and economic outcomes of labour migration:

1. State policies and regulations in both the UAE and UK exert significant influence on labour mobility, as mandated by legislation. These regulations also influence economic conditions. They define the criteria for managing the entry, employment opportunities, and living conditions of non-native labourers. The primary objective of this legislation is to guarantee the wellbeing and fair treatment of foreign workers. These rules may encompass migration prerequisites, employment consent directions, job guidelines, and initiatives aimed at promoting local recruitment (Brochmann&Hammar, 2020).
2. Financial and workforce requirements also significantly impact the legal frameworks and economic consequences of job migration. However, it is imperative to consider the social and human consequences of these changes. To attract and retain skilled personnel in sectors facing labour shortages, both governments can adapt their regulations and policies (CFI Team, 2022). It is also essential to assess the potential impact on related sectors and the broader economy. Ensuring that these changes are equitable and advantageous for all relevant stakeholders is paramount.
3. Concerns related to national security and immigration control can impact the legal framework and have economic ramifications related to labour relocation. In order to safeguard national security and promote financial well-being, governing authorities may enact tighter border controls and restrictions on the influx of migrants (OECD, 2014). They may also implement screening procedures with the intention of closely scrutinising new arrivals. It is essential to implement these measures whilst respecting fundamental rights and maintaining international alliances.
4. Bilateral and international agreements have the potential to shape the legal infrastructure and economic consequences of labour movement. These agreements are established amongst the Emirates, England, and other partaking nations. They influence the legal entitlements and protections afforded to overseas employees and establish the responsibilities of businesses and state entities in managing workforce movement. The International Labour Organization (2022) affirms that

these agreements play a crucial role in ensuring impartial and moral labour conditions internationally.

5. Social and cultural elements, including public perceptions, collective beliefs and established social norms, also influence regulatory systems and thus can determine the economic impacts of labour movement. These variables significantly affect the overall immigration process and the wellbeing of labour migrants, impacting both individuals and host communities. Public perceptions of the process of relocating, combining, and treating migrant workers can also affect authorities' decisions and employment opportunities for immigrants (Statham & Tillie, 2016).
6. Worker rights and protections within the job market also have repercussions on the economic implications of labour mobility. The extent to which worker protections safeguard employees in practice can impact the financial security of migrants and their employment opportunities. Achieving these objectives necessitates collaboration between public administrations, businesses and grassroots initiatives (Pouliakas & Theodossiou, 2011).
7. Global economic trends, such as economic slumps, market changes, and international trade movements, can influence legal structures and the financial effects of workforce relocation. These trends can also affect the salaries of foreign workers, as well as overall labour market dynamics. Financial recessions can also have a profound impact on migration regulations, career opportunities, and salaries for both foreign and domestic workers (World Bank, 2022).

Discussion

This section presents an in-depth analysis of the study's findings and their significance in the context of literature and public policy. In addition to offering valuable insights for further research, we address the study's limitations.

Legal Frameworks Surrounding Nationality Laws and Labour Migration in the UAE and the UK:

The regulatory systems governing citizenship and labour migration in the UAE and the UK exhibit noteworthy distinctions. Both nations have implemented comprehensive strategies to govern and manage the influx of international labourers. In the UAE, the acquisition of citizenship primarily hinges on ancestral ties, following the principle of *jus sanguinis*. Recent legislative changes have introduced pathways to citizenship based on financial investments, professional qualifications, and specialised skills. Additionally, the UAE has instituted guidelines for transferring sponsorship and specific employment regulations to safeguard the rights of employees.

In contrast, the United Kingdom employs a combination of descent (*jus sanguinis*) and birthplace (*jus soli*) principles obtaining citizenship. The UK operates on a points-based immigration system, complemented by industry-specific regulations, and extensive labour laws addressing various employment facets. Consequently, people looking to migrate to Britain need to satisfy particular requirements specified in the points-oriented framework. These divergent regulatory frameworks have a significant impact in shaping guidelines for migrant labour. Furthermore, they establish prerequisites and delineate the rights and protective measures afforded to migrant workers.

Variations in Legal Frameworks and Economic Outcomes of Labor Migration in the UAE and the UK:

Significant disparities exist in the legal frameworks and financial implications associated with labour mobility in the UAE and the UK. The UAE has implemented a range of laws and initiatives aimed at attracting international workers and promoting their participation in the country's economic development. These initiatives encompass the introduction of extended residency permits, the setup of tax-free zones, and the enforcement of

employment market changes. Notable programs like the Golden Visa, modifications to naturalisation laws, regulations governing the transfer of sponsorships. Bilateral agreements with allied countries also play a pivotal role in shaping these policies.

On the other hand, the United Kingdom employs a merit-based scoring system for immigration, favouring highly qualified employees. Moreover, it contains industry-specific rules and inclusive labour statutes. The financial outcomes of labour migration in both the UAE and the UK vary depending on factors such as the industries in which migrants are employed, their qualifications, and credentials. The broader labour market conditions also exert a significant influence on these outcomes. Foreign workers in both nations contribute substantially to economic growth, addressing labour shortages, bolstering particular sectors, and fostering innovation and entrepreneurship. They also make substantial contributions to tax revenues, remittances, and enrich the cultural diversity of their respective host countries.

Economic Outcomes of Labour Migration in the UAE and the UK, including Impact on the Labour Market, Wages, and Productivity:

Labour migration in both the UAE and the UK exerts substantial economic influence on the labour market, wage dynamics, and overall productivity. In the UAE, foreign labour has been essential to economic growth, particularly in construction, oil and gas, finance, and tourism. These workers enhance service provision, boost consumption, and stimulate job creation by transferring valuable skills and knowledge. Similarly, migrant workers have filled gaps in the UK's labour market, especially in healthcare, construction, and information technology. They have aided in demographic support, innovation, tax revenue, and economic growth.

Ordinary Least Square Regression Analysis:

Table 1: OLS estimation for impact of changes in nationality laws in UAE on economic growth

SUMMARY OUTPUT									
Registration Statistics									
Multiple R		0.314139211							
R Square		0.098683444							
Adjusted R Square		-0.351974834							
Standard Error		4.750087718							
Observations		4							
ANOVA									
	df	SS	MS	F	Significance F				
Regression	1	4.940833333	4.940833333	0.21897621	0.685860789				
Residual	2	45.12666667	22.56333333						
Total	3	50.0675							
	Coefficients	Standard Error	t Stat	P-value	Lower 95%	Upper 95%	Lower 95.0%	Upper 95.0%	
Intercept		1.7	4.750087718	0.357888128	0.75466872	-18.73797789	22.13797789	-18.73797789	22.13797789
Changes in Nationality Laws or Regulations									
UAE	-2.56666666	5.484928862	-0.467948945	0.68586078	-26.16641074	21.0330774	-26.16641074	21.0330774	

Table 2: OLS estimation for impact of changes in nationality laws in UK on economic growth

79 Nationality Law and Labor Migration: A Comparative Analysis of Legal Frameworks and Economic Outcomes in the United Arab Emirates and United Kingdom

SUMMARY OUTPUT

Registration Statistics	
Multiple R	0.08436696213
R Square	0.007117784299
Adjusted R Square	-0.489323236
Standard Error	9.88449965
Observations	4

ANOVA					
	df	SS	MS	F	Significance F
Regression	1	1.4008333	1.400833	0.014337	0.9156330379
Residual	2	195.4066667	97.70333		
Total	3	196.8075			

	Coefficients	Standard Error	t Stat	P-value	Lower 95%	Upper 95%	Lower 95.0%	Upper 95.0%
Intercept	1.6	9.88449965	0.161869	0.886283	-40.9295694	44.1295694	-40.9295694	44.1295694
Changes in Nationality Laws or Regulations UAE	-1.366666667	11.41363707	-0.119739	0.915633	-50.47558335	47.74225002	-50.47558335	47.74225002

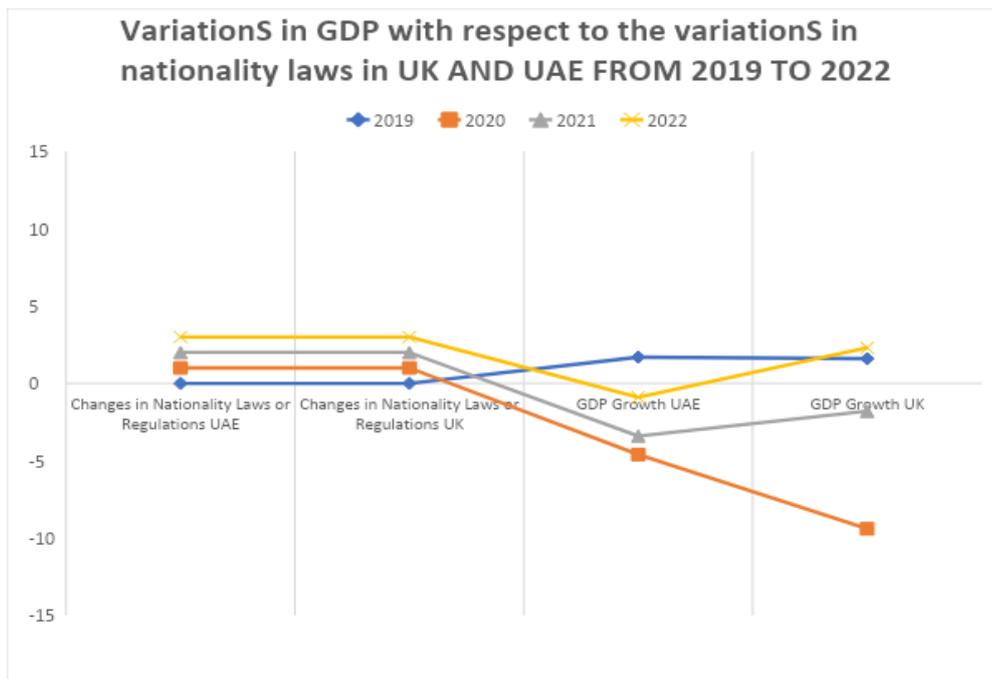


Figure. 1: Variations in GDP with respect to nationality laws in UK and UAE

For UAE:

- The variable associated with the intercept equals 1.7. This suggests that in cases where no alterations occur within the laws governing nationality or rules (with the independent variable set to 0), the projected annual increase of the UAE's GDP amounts to 1.7%.
- The value of the "Modifications in Citizenship Legislation UAE" has a value of -2.5667. Nevertheless, the significance level regarding this factor stands at 0.6859. It is crucial to observe that the given value surpasses the common significance value of a significance threshold of 0.05.
- This suggests that just 9.87% of the fluctuation in the yearly increase of the gross domestic product within the UAE can be clarified by revisions in ethnicity laws or regulations. The corrected R-squared value equals -0.3519. This implies that the predictor variable does not play a major role in the effectiveness of the analytical model.
- This signifies the mean difference of the factual yearly expansion of the gross domestic product from the estimated figures as per the model.

For UK

- The variable related to the baseline is represented by 1.6. This suggests that in cases where no modifications occur related to nationality legislation, the projected yearly increase of the Gross Domestic Product in the UK equals 1.6%. Nevertheless, if modifications occur within the laws governing nationality or statutes, the influence on economic expansion is not taken into consideration in this study.
- The number for "Amendments to Nationality Laws or Regulations UK" is calculated as -1.3667. Nevertheless, the significance level associated with this parameter equals 0.9156. It is crucial to acknowledge that the value is more than the common significance level of 0.05 threshold.
- This suggests that a mere 0.71% of the fluctuations in the yearly increase of the nation's GDP can be clarified by adjustments in legislation or rules regarding nationality. The revised R-squared measure stands at -0.4893. This implies that the control variable does not significantly influence the effectiveness of the model.
- This signifies the typical deviation of the real yearly expansion of the overall economic production from the projected estimates, as per the model.

Based on the results, it is evident that there is no significant correlation between alterations in nationality laws and regulations in the UAE and the UK with respect to the economic outcomes like GDP. This comparative analysis of legal frameworks and economic outcomes in the United Arab Emirates and United Kingdom offers a thorough examination of nationality and labour migration laws. However, the outcomes of the regression analysis did not show any significant relation between the GDP and variation in the nationality laws in the UAE and the UK.

Hence, this study is subject to limitations which are explained as follows:

1. Limited Data: Despite drawing from extensive sources, research is an ongoing process, and there may be unexplored data that could impact the results and their applicability to a broader context.
2. Sample Selection: Focusing solely on the UAE and the UK might neglect influential factors relevant to other countries. This research exclusively examines the legal and economic aspects of labour and nationality laws in these two nations, disregarding potential factors of significance elsewhere.
3. Subjectivity and Bias: Due to the restricted data availability, results may be prone to bias, potentially undermining the impartiality and neutrality of the analysis.
4. Changing contexts and dynamics: The evolving nature of national laws and policies can render this research less pertinent over time. Findings are grounded in the present, which may not hold true in the future when nationality and labour migration laws evolve.
5. Scope and depth: The study's regression analysis is confined to two variables: changes in nationality laws and GDP. Other crucial variables such as employment rates and wages were not considered, constraining the scope and depth of the research.

Conclusion and Recommendation

Summary of Findings

The research findings illuminate the distinct legal frameworks governing nationality and labour immigration in both the United Arab Emirates and the United Kingdom. In the UAE, the legal framework encompasses regulations pertaining to citizenship acquisition, immigration procedures, employment authorizations, and workforce mobility. However, it is crucial to recognise that these provisions are subject to periodic revisions and thus warrant continuous evaluation. Within the United Kingdom, the legal structure

encompasses rules regarding citizenship acquisition, immigrant visas, work permits, and worker entitlements. These rules ensure that individuals possess the requisite documentation and privileges to reside, engage in employment, and access services within the nation.

The research also identified parallels between the UAE and the UK concerning their strategies for labour migration and legal status. Nevertheless, substantial variations exist in their respective approaches and protocols. Both nations have introduced legal amendments aimed at attracting skilled employees to address workforce requirements. These initiatives prioritize the rights of workers and promote inclusive workplace strategies.

Furthermore, the research demonstrated that employee relocation has played a role in the financial expansion and progress of both the UAE and the UK. Foreign labourers have mitigated labour shortages, fortified critical sectors and heightened economic productivity. These individuals have also brought various skills and specialized knowledge, driving innovation and entrepreneurial spirit.

In summary, this research offers a comprehensive examination of the legal structures, economic outputs and recommendations for enhancing labour migration and citizenship regulations in the UAE. The findings emphasize the importance of a holistic strategy that considers financial prerequisites, worker protections, community integration, and international collaboration in developing impactful legal systems regarding workforce mobility.

Implications of the Study

Following are the implications of the study:

1. **Policy Development:** The research findings provide a strategic roadmap for policymakers in both the UAE and the UK, guiding them in the development of effective immigration and workforce migration policies to attract talented workers. These policies not only stimulate economic growth but also safeguard the rights and privileges of immigrant labourers.
2. **Comparative Analysis:** The comparative analysis offers a nuanced understanding of the commonalities and distinctions between these two nations. It serves as a valuable resource for other countries grappling with similar challenges in managing labour mobility.
3. **Economic Catalyst:** Recognising the pivotal role of labour migration in fuelling economic expansion and job creation, the study underscores the importance of implementing measures that not only entice but also retain skilled professionals, thereby bolstering competitiveness and fostering sustained economic progress.
4. **Social and Cultural Integration:** Policies that promote the social and cultural integration of migrant workers can promote social cohesion and inclusive communities. This highlights the necessity for inclusive immigration policies.
5. **Future Research:** The analysis uncovers promising avenues for future research, including the examination of labour migration's impacts on income and employment prospects, the enduring effects of labour migration regulations, and the effectiveness of integration programs.
6. **International Collaboration:** Mutual and global pacts contribute significantly to the formation of employment mobility guidelines. This underscores the value of collaborative efforts and the sharing of expertise among nations.
7. **Public Perception and Awareness:** Addressing public perception and championing the dissemination of accurate information concerning labour migration can promote comprehension and financial support. This facilitates a better educated and open discussion on this crucial matter.

Recommendations for future research

1. **Longitudinal Analysis:** Employing a longitudinal analysis framework would offer a robust structure for a future study, enabling the tracking of variable fluctuations over an extended period.
2. **Comparative Case Studies:** Conducting multiple case studies not only enriches our comprehension but also would provide a more holistic overview of the subject matter.
3. **Stakeholders Perspective:** Involving key stakeholders in the research such as migrants, policymakers, the subject matter experts is paramount. Their valuable insights and perspectives can significantly enhance the depth of analysis and contribute to the formulation of effective future strategies.
4. **International Comparison:** While the study focuses on the UAE and UK, broadening the scope to include additional nations for comparison, both with each other and with a broader international context, will improve the research's relevance and scope.
5. **Impact Assessment:** An impact assessment of the legal systems and economic impacts of labour migration in the UAE and the UK would allow for a thorough investigation into the efficacy and efficiency of current policies. This assessment should encompass intended and unintended outcomes, spanning social, economic and cultural dimensions.
6. **Collaboration in Research:** The credibility of the study would be improved by working with other researchers, institutions, or organisations involved in the study of labour migration and immigration policies. Engaging in multidisciplinary research and sharing knowledge can provide a comprehensive understanding of the complex issues surrounding labour migration.

Incorporating these recommendations into future research endeavours will not only deepen our understanding of labour migration dynamics, but also serve the interests of a wide range of stakeholders. It will contribute to evidence-based policymaking, and inform the development of more inclusive and effective labour migration policies.

References

- Alsabeehg, Z., &Kuzmova, Y. (2022). Report on Citizenship Law: United Arab Emirates. https://cadmus.eui.eu/bitstream/handle/1814/75029/RSC_GLOBALCIT_2022_07.pdf?sequence=1
- Ashcroft, R. T., & Bevir, M. (2018). Multiculturalism in contemporary Britain: policy, law and theory. *Critical Review of International Social and Political Philosophy*, 21(1), 5.
- Barbero, I. (2012). Expanding Acts of Citizenship: The Struggles of Sinpapeles Migrants. *Social & Legal Studies*, 21(4), 529–547. <https://doi.org/10.1177/0964663912455944>
- Bauer, T. K., Haisken-DeNew, J. P., & Schmidt, C. M. (2004). International labor migration, economic growth and labor markets-the current state of affairs.
- Bealer, D., &Bhanugopan, R. (2013). Transactional and transformational leadership behaviour of expatriate and national managers in the UAE: a cross-cultural comparative analysis. *The International Journal of Human Resource Management*, 25(2), 293–316. <https://doi.org/10.1080/09585192.2013.826914>
- Beebeejaun, Z. (3). The UAE Legal System. *Commercial Law*.
- Bertocchi, Graziella and Strozzi, Chiara, Citizenship Laws and International Migration in Historical Perspective (May 2005). Available at SSRN:<https://ssrn.com/abstract=603542> or <http://dx.doi.org/10.2139/ssrn.603542>
- British Nationality Act 1981. (2010). Legislation.gov.uk. <https://www.legislation.gov.uk/ukpga/1981/61>

- Brochmann, G., & Hammar, T. (2020). Mechanisms of Immigration Control: A Comparative Analysis of European Regulation Policies. In Google Books. Routledge. <https://books.google.co.in/books?hl=en&lr=&id=hX7pDwAAQBAJ&oi=fnd&pg=PP1&dq=The+rules+and+regulations+define+the+criteria+regulating+the+entry>
- Castles, S. (2009). Development and migration--migration and development: what comes first? Global perspective and African experiences. *Theoria*, 56(121), 1-31.
- CFI Team. (2022, December 5). Labor Market. Corporate Finance Institute. <https://corporatefinanceinstitute.com/resources/economics/labor-market/>
- Clyde & Co. (2023). UAE employment and immigration legal landscape - key takeaways from 2022 : Clyde & Co. www.clydeco.com. <https://www.clydeco.com/en/insights/2023/01/uae-employment-immigration-landscape-2022-takeaway>
- Dahiyat, E. A. R. (2017). A legal framework for online commercial arbitration in UAE: new fabric but old style!. *Information & Communications Technology Law*, 26(3), 272-292.
- Dauvergne, C., & Marsden, S. (2014). The ideology of temporary labour migration in the post-global era. *Citizenship studies*, 18(2), 224-242.
- David Owen (2013) Citizenship and the marginalities of migrants, *Critical Review of International Social and Political Philosophy*, 16(3), 326-343, DOI: 10.1080/13698230.2013.795702
- De Groot, G. R. (2012). Nationality law. In *Elgar Encyclopedia of Comparative Law*, second edition (pp. 600-619). Edward Elgar Publishing.
- Department for Business, Innovation and Skills. (2015). The impacts of migrant workers on UK businesses. https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/406760/bis-15-153-impacts-of-migrant-workers-on-uk-business.pdf
- Doherty, M., Leung, B., Lorenze, K., & Wilmarth, A. (2014, December). Understanding South Asian Labor Migration. In *Workshop in International Public Affairs*. The Robert M. La Follette School of Public Affairs, University of Wisconsin–Madison.
- Ecevit, Z., & Zachariah, K. C. (1978). International labor migration. *Finance and Development*, 15(4), 32-37.
- EXPLANATORY MEMORANDUM TO THE BRITISH NATIONALITY (GENERAL) (AMENDMENT) REGULATIONS 2020, 2020 No. 1141 , (2022). https://www.legislation.gov.uk/ukxi/2020/1141/pdfs/ukxiem_20201141_en.pdf
- Errichiello, G., & Nyhagen, L. (2021). “Dubai is a transit lounge”: Migration, temporariness and belonging among Pakistani middle-class migrants. *Asian and Pacific Migration Journal*, 011719682110133. <https://doi.org/10.1177/01171968211013309>
- Faist, T., Schmidt, K., & Ulbricht, C. (2016). Inclusion, Exclusion, and Citizenship: An Overview of European Practice.
- Fernández-Reino, M., & Rienzo, C. (2022, January 6). Migrants in the UK Labour Market: An Overview - Migration Observatory. Migration Observatory. <https://migrationobservatory.ox.ac.uk/resources/briefings/migrants-in-the-uk-labour-market-an-overview/>
- Goss, J., & Lindquist, B. (1995). Conceptualizing international labor migration: a structuration perspective. *International migration review*, 29(2), 317-351.
- Grivna, M., Aw, T. C., El-Sadig, M., Loney, T., Sharif, A. A., Thomsen, J., ... & Abu-Zidan, F. M. (2012). The legal framework and initiatives for promoting safety in the United Arab Emirates. *International journal of injury control and safety promotion*, 19(3), 278-289.
- Guild, E. (2017). Who is entitled to work and who is in charge? Understanding the Legal Framework of European Labour Migration. In *Controlling Frontiers* (pp. 100-139). Routledge.
- Gulf Labour Markets and Migration. (2017). United Arab Emirates’ Legal Framework of Migration. https://gulfmigration.grc.net/media/pubs/exno/GLMM_EN_2017_02.pdf

- Hervé, P., & Arslan, C. (2017). Trends in labor migration in Asia. Safeguarding the Rights of Asian Migrant Workers from Home to the Workplace.
- ILO. (2022, February 17). Guidance on Bilateral labour migration agreements. [www.ilo.org. https://www.ilo.org/global/topics/labour-migration/publications/WCMS_837529/lang--en/index.htm](https://www.ilo.org/global/topics/labour-migration/publications/WCMS_837529/lang-en/index.htm)
- Jamal, M. A. (2015). The “tiering” of citizenship and residency and the “hierarchization” of migrant communities: The United Arab Emirates in historical context. *International Migration Review*, 49(3), 601-632.
- Juss, S. S. (1994). Nationality Law, Sovereignty, and the Doctrine of Exclusive Domestic Jurisdiction. *Fla. J. Int'l L.*, 9, 219.
- Kaur, A. (2014). Managing labour migration in Malaysia: Guest worker programs and the regularisation of irregular labour migrants as a policy instrument. *Asian Studies Review*, 38(3), 345-366.
- Lari, N. (2022). Toward marriage sustainability: Impacts of delayed marriages in Qatar. *Cogent Social Sciences*, 8(1). <https://doi.org/10.1080/23311886.2022.2083480>
- Malit Jr, F. T., & Youha, A. A. (2013, September 18). Labor Migration in the United Arab Emirates: Challenges and Responses. [Migrationpolicy.org. https://migrationpolicy.org/article/labor-migration-united-arab-emirates-challenges-and-responses](https://migrationpolicy.org/article/labor-migration-united-arab-emirates-challenges-and-responses)
- Midtbøen, A. H., Birkvad, S. R., & Erdal, M. B. (2018). Citizenship in the Nordic countries: past, present, future.
- Migration Observatory. (2022). Deportation and Voluntary Departure from the UK - Migration Observatory. <https://migrationobservatory.ox.ac.uk/resources/briefings/deportation-and-voluntary-departure-from-the-uk/>
- Nadkarni, S., & Haider, I. (2022). Digital transformation, operational efficiency and sustainability: innovation drivers for hospitality’s rebound in the United Arab Emirates. *Worldwide Hospitality and Tourism Themes*. <https://doi.org/10.1108/whatt-05-2022-0054>
- Nationality and Borders Act 2022. (2022). [Legislation.gov.uk. https://www.legislation.gov.uk/ukpga/2022/36/contents/enacted](https://www.legislation.gov.uk/ukpga/2022/36/contents/enacted)
- Naufal, G. S., Malit Jr, F. T., & Genc, I. H. (2016). Contemporary Indian labour migration in the GCC region: emerging challenges and opportunities. *India Migration Report 2016*, 85-96.
- OECD. (2014). Is migration good for the economy? [OECD. https://www.oecd.org/migration/OECD%20Migration%20Policy%20Debates%20Numero%2002.pdf](https://www.oecd.org/migration/OECD%20Migration%20Policy%20Debates%20Numero%2002.pdf)
- Pouliakas, K., & Theodossiou, I. (2011). THE ECONOMICS OF HEALTH AND SAFETY AT WORK: AN INTERDISCIPLINARY REVIEW OF THE THEORY AND POLICY. *Journal of Economic Surveys*, 27(1), 167–208. <https://doi.org/10.1111/j.1467-6419.2011.00699.x>
- Rainer Bauböck (2011) Temporary migrants, partial citizenship and hypermigration, *Critical Review of International Social and Political Philosophy*, 14(5), 665-693, DOI: 10.1080/13698230.2011.617127
- Rubenstein, K. I. M. (2003). Review essay: the centrality of migration to citizenship. *Citizenship studies*, 7(2), 255-265.
- Ruhs, M. (2018). Labor immigration policies in high-income countries: Variations across political regimes and varieties of capitalism. *The Journal of Legal Studies*, 47(S1), S89-S127.
- Simionescu, M., Strielkowski, W., & Kalyugina, S. (2017). The impact of Brexit on labour migration and labour markets in the United Kingdom and the EU. *Terra Economicus*, 15(1), 148-156.
- Slapper, G., & Kelly, D. (2014). *The English Legal System: 2014-2015*. Routledge.
- Sredanovic, D. (2020). Barriers to the Equal Treatment of (Aspirant) Citizens: The Case of the Application of Nationality Law in Belgium. *International Migration*, 58(2), 15-29.

- Stark, O., & Bloom, D. E. (1985). The new economics of labor migration. *The American Economic Review*, 75(2), 173-178.
- Statham, P., & Tillie, J. (2016). Muslims in their European societies of settlement: a comparative agenda for empirical research on socio-cultural integration across countries and groups. *Journal of Ethnic and Migration Studies*, 42(2), 177–196. <https://doi.org/10.1080/1369183x.2015.1127637>
- Taylor, E. J. (1999). The new economics of labour migration and the role of remittances in the migration process. *International migration*, 37(1), 63-88.
- Thiollet, H. (2011). Migration as diplomacy: Labor migrants, refugees, and Arab regional politics in the oil-rich countries. *International Labor and Working-Class History*, 79(1), 103-121.
- Unterreiner, A., & Weinar, A. (2014). The conceptual framework of the INTERACT project.
- Vargas-Silva, C., & Sumption, M. (2023). The Labour Market Effects of Immigration. *Migration Observatory*. <https://migrationobservatory.ox.ac.uk/resources/briefings/the-labour-market-effects-of-immigration/#kp1>
- Wiesbrock, A., & Hercog, M. (2010). The legal framework for highly-skilled migration to the EU: EU and US labour migration policies compared. Maastricht Graduate School of Governance Working Paper MGSOG/2010/001. Maastricht: Maastricht University.
- World Bank. (2022, April 4). Trade Overview. World Bank. <https://www.worldbank.org/en/topic/trade/overview>.