The Government of Bahrain meets the minimum standards for the elimination of trafficking. The government continued to demonstrate serious and sustained efforts during the reporting period, considering the impact of the COVID-19 pandemic on its anti-trafficking capacity; therefore Bahrain remained on Tier 1. These efforts included establishing a specialized trafficking Public Prosecutor's Office and High Court, convicting a complicit government official for sex trafficking, and reporting more sex trafficking convictions. The government also increased efforts to prevent vulnerability of migrants who lost immigration status due to pandemic-related job loss through implementing a series of measures to protect migrant workers and reduce instances of forced labor. Although the government meets the minimum standards, it did not prosecute or, for the third consecutive year, convict any traffickers for forced labor. The government did not proactively identify victims of all forms of trafficking, specifically victims of forced labor, and it identified significantly fewer victims overall. It did not routinely employ its proactive identification and referral mechanism, which resulted in the penalization of some potential and unidentified victims, specifically those arrested for immigration violations or engaging in commercial sex and those fleeing forced labor. In addition, authorities sometimes treated forced labor—including cases of unpaid or withheld wages, passport retention, and related abuses—as labor law violations, rather than potential trafficking crimes.

**PRIORITIZED RECOMMENDATIONS:**

Increase efforts to investigate, prosecute, and convict traffickers, particularly suspects of labor trafficking, including domestic servitude, and allegedly complicit officials. • Expand and actively enforce labor law protections for domestic workers and to all workers holding flexi-work permits and permanently allow domestic workers to self-sponsor through flexible work permits. • Increase investigations and prosecutions of potential forced labor cases involving passport retention, non-payment of wages, and other indicators as trafficking crimes. • Strengthen and expand sponsorship reforms to domestic workers, such as allowing domestic workers to change jobs at any time without employer consent. • Implement the new Wage Protection System (WPS) and ensure it covers all migrant workers, including domestic workers and flexi-permit holders. • Continue to train officials, particularly law enforcement and prosecutors, on the anti-trafficking law and victim identification, particularly for victims of forced labor. • Ensure that victims of all forms of trafficking receive equal access to protection services and that receiving shelter and other provisions does not depend on confirmation of a trafficking crime from the Public Prosecutor. • Increase proactive identification of trafficking victims among vulnerable groups, such as domestic workers, migrant workers, Cuban medical missions, Chinese nationals working on projects managed by state-owned enterprises, and individuals in commercial sex. • Train officials on and routinely use the two labor trafficking-focused directorates to identify labor trafficking victims and investigate labor traffickers. • Continue to conduct national anti-trafficking awareness campaigns, strategically targeting migrant and domestic workers.
PROSECUTION

The government demonstrated varied law enforcement efforts during the reporting period, as it built greater capacity to prosecute trafficking cases under the anti-trafficking law and convicted a complicit government official for sex trafficking but did not prosecute or convict any traffickers for forced labor crimes. The anti-trafficking law, No. 1 of 2008, criminalized sex trafficking and labor trafficking. It prescribed penalties ranging from three to 15 years’ imprisonment, plus a fine of between 2,000 and 10,000 Bahraini dinar (BD) ($5,310-$26,530) and the cost of repatriating the victim(s), which were sufficiently stringent and, with respect to sex trafficking, commensurate with penalties prescribed for other serious crimes, such as rape.

The government continued to maintain a police unit dedicated to investigations of trafficking crimes. In an effort to increase investigations and prosecutions under the anti-trafficking law, Bahrain’s Attorney General issued Order 34 that established a specialized Trafficking in Persons Prosecutor’s Office (PPO) and the First High Criminal Court for Trafficking in Persons during the reporting period. The government created the specialized PPO office to give prosecutors the full investigatory mandate to prosecute all trafficking crimes under the 2008 anti-trafficking law and ensure that potential victims of trafficking had greater access to legal recourse and adequate protection services and assistance. Both the prosecutor’s office and court included staff specially trained by the Labor Migration Regulatory Authority (LRMA) and two international organizations on human trafficking.

The Ministry of Interior (MOI) reported investigating 19 potential trafficking cases (33 individual arrests) during the reporting period, of which 15 were for sex trafficking and four for forced labor, marking an overall decrease compared with 29 sex trafficking and 12 labor trafficking investigations during the previous reporting period. Calls to the government-run national trafficking hotline resulted in two of these investigations, as staff alerted the police who subsequently investigated the allegations. Officials prosecuted 27 alleged sex traffickers and zero individuals for alleged forced labor crimes, down from 53 and seven, respectively, the year prior. The government convicted 22 individuals for sex trafficking under the anti-trafficking law and handed down sentences between three and 15 years’ imprisonment plus a fine in accordance with the law; it convicted 14 sex traffickers and administered similar sentences the previous reporting cycle. Courts sentenced two of the 22 traffickers to life in prison and ordered their deportation from Bahrain upon completion of their sentences. As in the previous two years, officials did not achieve any forced labor convictions. Also, as in the previous two years, the government required convicted traffickers to pay all costs associated with the repatriation of the victims. The government planned to deport all non-Bahraini trafficking offenders upon the completion of their sentences. In April 2020, a Bahraini court convicted eight traffickers to seven years’ imprisonment and a fine of 5,000 BD ($13,260) in a case initiated in the previous reporting period; the case involved Bahraini cooperation with the Government of the Philippines and involved two Filipino nationals who were forced into commercial sex upon arrival in Bahrain. The government also convicted a Bahraini police officer for complicity in the sex trafficking ring. In another case initiated in the previous reporting period and involving 21 Kazakhstani females forced into commercial sex in Manama, the LMRA, Ministry of Justice (MOJ), and MOI worked closely with the Kazakh Embassy in Saudi Arabia and with police officials in Kazakhstan to obtain testimony.
from the victims during the initial stages of the investigation before they departed Bahrain. The case resulted in the conviction of three traffickers and the repatriation of all 21 victims through funds from the government’s victim assistance fund.

NGOs and civil society reported that although the government provided training to officials on identifying cases and victims of forced labor, frontline authorities, nevertheless, sometimes recorded instances of non-payment of wages and passport confiscation as labor violations and rarely referred these cases to the PPO for investigation as potential trafficking cases. The government reported workers continued to be able to file a grievance against an employer in a labor court if arbitration was unsuccessful. The LMRA reported it began providing pro bono legal services through the Labor Case Submission Office for migrant workers and screened each of the 1,277 submitted cases for indicators of human trafficking. The government previously improved prospects for criminal prosecution of labor trafficking cases. The LMRA established two directorates in the previous reporting period and housed them within the MOJ’s Labor Case Coordination section. The first directorate was the Protective Inspection Directorate (PID), which had the mandate to identify, investigate, and document all forms of labor exploitation with a focus on those with a prospective nexus to trafficking; it was staffed by labor inspection officers trained by two international organizations. The second directorate was the Grievances and Protections Directorate (GPD), which was able to receive, register, and document all labor-related criminal cases. The government incorporated both directorates into the government’s broader national referral mechanism (NRM) with the goal of increasing laborers’ access to the justice system, reducing the time for courts to render an official decision, and examining labor disputes from a trafficking, victim-centered lens. The government reported PID investigators could submit their findings directly to the PPO or the High Criminal Court for Trafficking in Persons; however, the government did not report whether the PID referred any cases in this manner during the reporting period. However, none of these referrals resulted in prosecutions for forced labor crimes. During the reporting period, the government provided training to nearly 2,000 judges, lawyers, police officers, government officials, and LMRA officials on topics related to trafficking, including victim-centered and trauma-informed approaches, NRM design and management, and challenges related to victim identification. Beginning in February 2020, the government shifted all training efforts to online platforms due to the pandemic.

**PROTECTION**

The government made varied efforts to protect victims; it continued to provide strong protection services to confirmed victims, but it did not routinely identify victims of forced labor, rendering some potential trafficking victims unable to receive government provided shelter and other protective services. The government identified and provided robust protective services to 19 adult female sex trafficking victims (one of which was identified and referred via the trafficking hotline), a decrease compared with the 39 victims it assisted during the previous reporting period. All of the victims were from Indonesia, India, Thailand, Morocco and Kazakhstan. In total, 74 individuals received assistance at the government’s trafficking shelter during the reporting period, including one adult male and five children. The government continued to employ its NRM to proactively identify trafficking victims, ensure proper documentation of cases, refer cases to the MOI and PPO for an official determination as a trafficking case, and provide adequate
protective provisions to victims until case resolution or voluntary repatriation. Officials provided 30-page, bilingual English-Arabic NRM booklets to all relevant ministries and NGO stakeholders. The LMRA's digitized case management process under the NRM continued to increase in speed and overall effectiveness in case management and coordination of support to victims. Police stations, other government entities, NGOs, and foreign embassies provided direct referrals to the LMRA. The government reported many individuals who received assistance were not confirmed trafficking victims, but rather vulnerable workers involved in labor disputes and employees requiring temporary shelter prior to repatriation. Further, the LMRA reported that its shelter served both male and female workers regardless of their legal status in the country and hosted presumed trafficking victims, severe cases of forced labor, and potential victims who may be in exploitable situations. Conversely, one NGO reported the government provided protection services, such as shelter, food, interpretation, legal assistance, and medical assistance only to trafficking victims confirmed by the PPO; however, a local NGO refuted the assessment that victims of forced labor may not have received the full assistance and protection services from the government since authorities rarely identified forced labor as a trafficking crime. Per the NRM, in instances where authorities did not identify an individual as a trafficking victim but rather part of a labor or exploitation case, the government offered that individual shelter depending on the severity of the case. The National Committee to Combat Trafficking in Persons (NCCTIP) shelter provided 16 of the 19 identified trafficking victims with shelter, food, clothing, medical care, religious support, psychosocial counseling, rehabilitation, transportation, familial reunification, translation assistance, legal counsel, and repatriation or job placement in Bahrain; the government reported that the remaining three victims chose not to reside in the shelter, but received full assistance from the government otherwise. In addition, the government provided all confirmed trafficking victims with monthly financial compensation—93 BD ($250)—via its victim assistance fund for those who remained in Bahrain for the duration of trial; additional funding was available through the LMRA's budget to cover the costs of victim repatriation and daily GPD expenditures, such as payroll and operational expenses. Embassies of labor-source countries reported providing housing on a temporary basis for some potential victims involved in labor disputes or abusive situations who refused to go to the NCCTIP shelter or were unable to reach it.

Articles 19 and 40 of the Labor Law established some protections for domestic workers, which include agricultural workers, home security guards, nannies, drivers, and cooks who work for the employer or family members, requiring employers to provide a labor contract specifying working hours, annual leave, bonuses, and that such workers must be paid at least monthly. However, Article 22, which prohibited contract switching or changes to preset work conditions outlined in the contract, was not applicable to domestic workers, effectively increasing their vulnerability to forced labor. Labor inspectors faced difficulties conducting unannounced inspections of domestic workers’ accommodations and investigating allegations of abuse in the absence of an official complaint due to cultural norms surrounding privacy in homes, which may have left some victims at risk of exploitation and without protection. The LMRA continued to disseminate to all registered recruitment agencies in Bahrain copies of the standard tripartite labor contract, which required domestic workers to sign, prior to their arrival, a comprehensive work agreement that outlined labor rights and employment obligations. The contract aimed to strengthen protections for domestic workers by requiring employers to disclose the nature of the job, hours to be worked, salary,
and other information. Domestic workers brought to Bahrain by recruitment agencies were able to accept or reject an employment contract in their respective countries of origin, and the LMRA maintained copies of signed contracts to assist in any future labor disputes. The LMRA maintained streamlined processes for obtaining initial visas and visa renewals for domestic workers. The inclusion of domestic workers in the Expatriate Management System, along with all other expatriate workers, increased the LMRA’s oversight capacity by standardizing the application process and retaining all worker-employee documents on the LMRA’s electronic systems. The government mandated all applications for domestic workers, whether received through a licensed recruitment office or directly from the employer, must be accompanied by the standard tripartite labor contract.

There were no reports that the government penalized victims for unlawful acts traffickers compelled them to commit; however, there were reports that it did not universally employ its proactive identification mechanism among vulnerable groups, such as domestic workers, migrant workers who fled employers, and individuals in commercial sex, meaning some potential victims may have remained unidentified and unprotected. Further, an NGO reported that in interviews with migrant men and women in deportation centers and others who were deported during the reporting period, authorities did not screen all arrested individuals for trafficking indicators before deportation. In addition, an NGO noted that the government did not identify potential trafficking victims during raids, and commercial sex workers were generally detained and deported without being screened for trafficking indicators. Bahraini officials provided comprehensive protective assistance to trafficking victims regardless of their willingness to participate in investigations and court proceedings of their traffickers and relieved them from all legal and financial penalties related to actions committed as a result of being subjected to trafficking. The government reported it shared with all victims a full evaluation of their cases and their legal right to restitution in the event of a conviction. During the reporting year, the government amended the Judicial Authority Law 42/2002 to allow the use of foreign languages in courts and permit the appointment of “non-Arab” judges in Bahraini courts, which allowed the court to hear testimony from non-Arabic-speaking witnesses directly, versus through a sworn translator as the original law stated, to have judges who could understand the witnesses in their native language. The government reported victims could testify via written correspondence, video recording, a closed-circuit live video, or in private, but it did not report if any victims utilized this option during the reporting period. Some migrant workers who fled abusive situations chose not to contact police to report abuse due to being a “free visa” holder—laborers in violation of the local labor law because they worked for a non-sponsor employer after leaving the employment of the sponsor that facilitated their entry into the country. Workers infrequently filed complaints against employers due to distrust of the legal system, protracted court processes, inability to afford legal representation, lack of interpretation and translation services, concern over potential loss of residence permits during proceedings, and fear of additional mistreatment due to employer reprisal. During the reporting period, the government repatriated at least 21 trafficking victims to their countries of origin at the victims’ request.

**PREVENTION**

The government maintained efforts to prevent trafficking. In 2020, the government finalized a three-year, 377,000 BD ($1 million) agreement with an international
organization to provide technical expertise to the Center of Excellence and Training for Trafficking in Persons, established in partnership with two international organizations during the previous reporting period, for the purpose of capacity building of victim assistance among government and regional stakeholders. The government was unable to offer training courses due to the pandemic. During the reporting period, high-level government officials and the LMRA participated in the second Inter-Governmental Forum on Combating Trafficking in Persons in the Middle East, hosted by the United Arab Emirates, and the forum appointed Bahrain as its permanent Secretary General in October 2020. High-level officials from across the region and two international organizations attended the forum to share anti-trafficking efforts during the pandemic, specifically related to increasing capacity to protect potential victims of trafficking.

The government also made significant efforts to address the increased vulnerability of migrant workers, regardless of residency status, due to pandemic-related job-loss or extended absence from work due to illness. These efforts included an amnesty period from April 2020 to December 2020 for all out-of-status workers (including those that lost legal status due to job loss), the elimination and/or reduction in costs associated with new and renewal work permits, including the “flexible (or flexi) work permit,” and the establishment of an online marketplace to allow workers who had experienced job loss to be re-hired by another employer in Bahrain as an alternative to returning to their home countries. The government also provided food, medical services, and financial relief to migrant workers throughout the pandemic.

Since its inception in July 2017, the LMRA’s “flexi” permit program has served to regularize thousands of undocumented workers while simultaneously permitting previously exploited and irregular laborers to sponsor themselves independent of an employer. From April 2020 to June 2020, the government eliminated all fees associated with residency visas and the “flexi” permit program, gradually increasing the fees to previous, pre-pandemic levels in September 2020. Likely due to the lower cost of the program, the number of “flexi” permit holders significantly increased from about 23,000 to 46,000 during the reporting period, allowing workers that had lost jobs or were part of the amnesty to regularize their residency status. The government reported around 40,000 migrant workers experienced pandemic-related job loss during the reporting period; however, by providing the “flexi” permit visa at a reduced cost and launching an online marketplace to allow workers to be re-hired in Bahrain, the LRMA reported 51,000 migrant workers had re-entered the workforce and reduced their vulnerability to trafficking. Under the “flexi” permit, foreigners could reside and work in Bahrain without a sponsor, thereby reducing trafficking vulnerabilities inherent in the kafala or sponsorship-based employment system. Successful applicants could work any full- or part-time job with any chosen employer—including multiple jobs concurrently with various employers—and were able to directly negotiate wages and working hours. From November 2018 to June 2019, the government temporarily extended eligibility for the “flexi” permit to domestic workers who absconded from their employers or had expired work visas to allow them to regularize their residency and work status. During the pandemic, the government renewed this policy and allowed domestic workers to apply for flexi-permits during the amnesty period that ended at the end of 2020. However, as of 2021, the government again removed domestic worker eligibility for the program, rendering domestic employees vulnerable to the plight of the kafala system. Legal workers were also eligible to enroll in the program without the consent of their employer after the termination or expiry of their work permit.
The “flexi” permit—which cost 432 BD ($1,150) for one year—included a work permit, health care coverage, a refundable deposit for travel tickets, an extension of residency timeframes, and waived immigration fines incurred while in irregular status. Some NGOs and labor rights organizations continued to express concerns that the “flexi” program was not a suitable alternative for low-income workers who may not be able to afford the high cost of the permit each month and in some cases must find daily work to keep up with the costs of the visa. Rights groups also expressed the need to ensure protections for flexi-permit holders; as holders who work on a freelance basis or in short-term employment are not required to have a contract with their employer, and rarely do, heightening their vulnerability to wage disputes or other issues with a temporary employer without protection under the labor law. Further, because the labor law does not explicitly cover flexi-permit holders (as they do not have an employer or sponsor), these individuals are not afforded the ability to file grievances or labor complaints with the labor courts as other workers covered under the law could; rather, flexi-permit holders could only file cases against employers in civil courts. Additionally, a flexi-permit is not an option before a migrant worker arrives in Bahrain—a worker only becomes eligible for the program once their visa has expired, their contract has ended, or they become irregular—which continued to put workers in situations of potential exploitation under a sponsor or employer when first arriving in the country. Since 2011, private sector workers have had freedom to change jobs without their employer’s consent after one year of employment; on average eight to nine percent of Bahrain’s migrant worker population change employers each year. However, the LMRA still must approve the transfer, and like the flexi-permit program, domestic workers do not have the ability to change jobs without employer consent—further heightening the risk of exploitation to this vulnerable population. The government also reported all workers were able to terminate employment at any time, with a notice period according to their contract, and leave the country permanently without employer consent.

Passport retention was a crime punishable under Article 395 of the Bahraini penal code, with a penalty of jail time, a fine, or both. However, according to the law, employers were allowed to retain an employee’s passport if the employee gave the employer permission to do so, enabling the employer to justify the action. Laborers continued to be able to file a grievance for passport withholding with the police, the Ministry of Labor and Social Development (MOLSD), or the LMRA. When handled by the LMRA, instances of passport retention were reportedly screened by trained GPD staff for indicators of trafficking. Representatives of labor-source country embassies reported that cases handled by the LMRA resulted in expedient and fair disposition of cases. A worker could also register a complaint to the court directly if the employer refused to return the passport; however, in most cases, once the LMRA, MOLSD, or police approached the employer, they returned the passport to the employee, and the worker chose not to pursue criminal charges against their employer. In a purported effort to address the crime, the LMRA’s GPD began working more closely with a local NGO to learn more about passport retention and address the issue directly with employers. During the reporting period, the GPD reported improvements in addressing passport retention by employers and reported that incidents of employers returning confiscated passports to employees increased by 365 percent. The GPD’s strategy included an awareness campaign about the issue of passport retention targeted at employers and underscored administrative and potential criminal repercussions for confiscating a worker’s documents. However, as in previous reporting periods, labor authorities or police did not report referring any cases of passport retention to the PPO for criminal investigation or prosecution.
The government made efforts to prevent forced labor by increasing inspections of recruitment agencies and announcing a plan to launch a Wage Protection System (WPS). The LMRA continued to oversee the issuing of licenses and regulation of recruitment companies through quarterly inspection visits to the offices and other measures to ensure the protection of workers’ rights. For example, the government continued to require all recruitment agencies to submit a security deposit equivalent of 10,000 BD ($26,530) to safeguard employees’ rights and required each employer to provide dedicated accommodation for recruited workers that met the LMRA’s standards. The LMRA’s PID employed 70 inspectors who were responsible for enforcement of employment violations, immigration violations, and worksite inspections. The LMRA’s PID reported conducting 2,264 inspections during the reporting year, of which 152 were for recruitment agencies. Through these inspections, the government permanently shut down six companies and suspended one recruitment agency; in 2019, it closed one agency. It also suspended 15 additional companies due to noncompliance with LMRA regulations and having workers without legal status employed in the establishments. As in previous years, the government did not report referring any recruitment agency or offices to the PPO for further investigation or criminal prosecution. In March 2021, the government announced plans to launch a WPS for private sector workers beginning in May 2021; the system, intended to be rolled out in three phases, is not currently obligated for employers of domestic workers, but employers of domestic workers had the option to participate in the system. The government reported the aim of the system was to ensure regularly and timely transfer of worker’s wages directly to their bank account and enhance transparency; the system will automatically flag instances of non-payment or delayed payment of wages, and an employer’s failure to pay monthly salaries on time would result in penalties and legal procedures against violators.

The government continued to fund awareness campaigns via text messages and social media targeting low-skilled migrant workers through the reporting period. It used mobile phones to proactively engage with migrant labor populations, sending out nearly one million text messages with the trafficking hotline information, labor rights facts, and police station locations as well as information to migrant workers about the pandemic and associated safety and health measures. In addition to traditional messages about the dangers and signs of trafficking, the LMRA also deployed extensive outreach campaigns to raise awareness for workers regarding the amnesty period during the year, guidance on how to obtain and renew a flexi-permit, and how to regulate their legal status due to pandemic related job loss. During the previous reporting period, the LMRA launched a website (endtrafficking.bh) with a wide range of information on trafficking and myriad resources readily accessible for foreign workers. However, NGOs reported key information on the website was only available in English, limiting its application. The LMRA continued to provide booklets outlining labor rights in 13 languages common among expatriate and migrant worker populations and distributed them to such populations upon their arrival at the Bahrain International Airport and at the LMRA when applying for initial or renewed residency cards. The LMRA’s Expat Protection Center’s trafficking hotline collected reports and served as a resource to educate workers about their rights and available services in Arabic, English, Hindi, Malayalam, Sinhalese, Tagalog, Tamil, Telugu, and Urdu 24 hours a day, seven days a week. The government advertised the hotline’s number and mandate through pamphlets given to each migrant worker upon arrival in Bahrain and circulated through the LMRA’s social media platforms and website. The government reported receiving a 151 percent increase in the number of calls during the reporting period.
(16,201, an increase compared with 6,444 such calls the previous year), most of which pertained to the pandemic and associated job losses. Officials initiated two trafficking investigations and identified and referred one victim through this hotline during the reporting period. The government concluded memoranda of understanding with several labor-source countries, including Pakistan and India, that focused on oversight of recruitment agencies and protection of migrant workers in Bahrain and provided technical assistance to other governments in the region on trafficking topics such as victim identification, care and assistance, migration management and sponsorship reform, and building a NRM. The government did not make efforts to reduce the demand for commercial sex acts. The government provided anti-trafficking training for its diplomatic personnel.

TRAFFICKING PROFILE

As reported over the past five years, human traffickers exploit foreign victims in Bahrain. Men and women, primarily from India, Bangladesh, Pakistan, Philippines, Ethiopia, Nepal, Egypt, Jordan, Yemen, Thailand, Syria, and Kenya, among other countries, migrate voluntarily to Bahrain to work as semi-skilled or unskilled laborers in the construction and service industries. The number of migrant workers from African states, such as Senegal, Cameroon, Uganda and The Gambia, is increasing. Prior to the pandemic, foreigners comprised approximately 80 percent of the total Bahraini workforce, the majority being unskilled or semi-skilled construction or maintenance workers. Likely due to pandemic-related job loss, the economic downturn, and an increased desire for workers to repatriate, Bahrain’s migrant workforce decreased in 2020. The government reported there were roughly 65,000 domestic workers in Bahrain in 2020, 85 percent of whom were female, predominantly from Ethiopia, India, Philippines, Bangladesh, Kenya, and Indonesia—20 percent fewer than the previous reporting period. This category of employee includes agricultural workers, home security guards, nannies, drivers, and cooks. Men from India and Bangladesh account for the vast majority of Bahrain’s male domestic workers. Domestic workers from African nations are increasingly at risk of forced labor and arrive in Bahrain via direct recruitment from local employers. Some employers subject migrant workers to forced labor in Bahrain; indicators include passport retention, strict confinement, contract substitution, non-payment of wages, debt bondage, threats or intimidation, and physical or sexual abuse. NGO and labor-source countries report an increase in incidents of unpaid wages and debt bondage, especially among construction and unskilled workers. Some migrant workers are not given or in possession of their employment contracts and are generally unfamiliar with the employment terms contained therein. Nationals of countries without diplomatic presence in Bahrain, most significantly from African countries, are particularly vulnerable to trafficking, as are domestic workers, who are only partially protected under Bahraini labor law, and cultural norms and existing legal infrastructure avert private home inspection. Government and NGO representatives report physical abuse and sexual assault of female domestic workers are significant problems in Bahrain; controlled freedom of movement, withholding of workers’ identity cards and passports, and employer coercion constrain employees from reporting such instances of exploitation. During the reporting year, NGOs report an increase in non-payment of wages and coercion for domestic workers who were forced to stay in their employer’s home and work after completing their contracts due to pandemic-related travel restrictions. Chinese nationals working in Bahrain may have been forced to work, including on projects managed by state-owned enterprises. Cuban nationals working in Bahrain may have
forced to work by the Cuban government.

While the government maintained regulatory authority over recruitment agencies, some migrant workers arrive in Bahrain independent of regulated agencies. Many laborers are paired with employers through intermediaries in Bahrain and unlicensed recruiters in their respective countries of origin; back-and-forth movement between Saudi Arabia and Bahrain via the King Fahad Causeway also contributes to this vulnerability, as Saudi nationals are able to sponsor foreign workers in Bahrain. Local press report traffickers recruit women to Bahrain via social media platforms or Bahrain-based acquaintances under false pretenses of high-paying jobs in the hospitality and domestic sectors and subsequently force them into sex trafficking. Traffickers also convince other women, mostly domestic workers already in Bahrain, to abscond from their employers with false promises of higher paying jobs; after being recruited, traffickers exploit some women in commercial sex through physical threats and debt-related coercion. Some NGOs report that due to pandemic-related shutdowns of the service industry, workers who lost their jobs were consequently forced or exploited in commercial sex. Some unscrupulous employers continue to lure migrant workers to Bahrain and release them illegally in the labor market under the “free visa” scheme—laborers who pay an employer a recurring fee to sponsor a work visa while performing work for other employers in violation of local labor law—which can render them vulnerable to trafficking due to their illegal working status. Although notable reforms are underway, Bahrain’s sponsorship-based employment system continues to put some workers, particularly domestic workers, at risk of trafficking by limiting their ability to change employers or leave the country and by giving employers the unilateral power to control the status of residency permits.