Margins and Power Across Continents: Governing Female Bodies and Actions in Asia and Europe

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Abstract: This study examines how governance systems across diverse sociopolitical contexts regulate women's bodies, labor, and public presence through intersecting legal, economic, and discursive mechanisms. Focusing on three case studies -Vietnam, the Gulf States, and Poland – we analyze how state policies, market dynamics, and cultural narratives condition women's legitimacy and visibility. In Vietnam, sex work is governed through a moral economy that frames it as a "social evil," subjecting women to both legal sanction and social shame. In the Gulf States, migrant domestic workers face structural control through the "kafala" system. rendering their labor extractable and their status precarious. In Poland, gendered disinformation campaigns delegitimize women in public life, particularly female politicians, by weaponizing stereotypes and undermining credibility. Despite these layered regimes of control, women across these regions engage in situated practices of resistance, such as forming informal networks, reshaping narratives, and asserting agency in constrained spaces. By tracing these parallel and divergent patterns of governance and resistance, the project contributes to a broader feminist understanding of how power operates transnationally at the intersection of gender, policy, and discourse.

Keywords: Vietnam, Gulf States, Europe, governance, control, gender, resistance

I. Introduction

Across the globe, power over women's lives is exercised not only through formal legal systems but also through economic regulation, moral discourse, and public narratives. Whether under socialism, neoliberal capitalism, or democratic populism, female bodies, labor, and public roles are systematically governed in ways that reflect and reinforce gendered hierarchies. These systems of governance intersect with local histories, societal anxieties, and transnational forces to shape the conditions under which women can work, migrate, speak, and be seen.

This article examines how governance – understood broadly as institutional, discursive, and normative control – is gendered across three distinct contexts: Vietnam, the Arab states of the Persian Gulf (hereafter the Gulf States), and Poland. It explores how systems of labor regulation, migration policy, and public narrative serve to police women's bodies, delegitimize their labor, and undermine their voices. While these regions differ in political ideology and institutional architecture, they share a common pattern: female agency is constrained through structures that operate both visibly and invisibly, formally and informally.

We ask: How do governance systems in Vietnam, the Gulf States, and Poland regulate women's labor, migration, and public legitimacy? What narratives about women are constructed through these mechanisms of control? In what ways do women negotiate, resist, or repurpose these systems in their daily lives?

Our central argument is that governance in Vietnam, the Gulf States, and Poland operates through a combination of law, economic systems, and cultural narratives to discipline women's mobility, behavior, and social legitimacy. However, we also show that women are not merely passive recipients of control. They are active agents that engage in diverse, situated practices of resistance through reframing their work, building informal solidarities, and asserting public presence.

By tracing the mechanisms of control and resistance across Asia and Europe, this article contributes to a broader feminist conversation on how power operates at the intersection of gender, governance, and inequality.

II. Control over Women's Bodies, Labor, Legitimacy

The following case studies from Vietnam, the Gulf States, and Poland examine how governance operates through laws, economic systems, and cultural narratives to discipline women's movements, behaviors, and legitimacy. Though distinct in form and context, each case reveals how power operates not only through state institutions but also through moral discourse, market dynamics, and information regimes.

II.1. Case Study 1: Vietnam

II.1.1. Historical and Socialist Foundations of Control

Sex work in Vietnam has a long history predating colonial rule, with one of its earliest literary representations appearing in Nguyễn Du's *Truyện Kiều* (1820). However, detailed records of pre-colonial practices are scarce. Under French colonialism, prostitution became legal and was institutionalized primarily to serve European men, reflecting racial hierarchies and colonial anxieties (Tracol-Huynh, 2010). While Vietnamese men also engaged sex workers, regulation focused on protecting white men and controlling interracial relations (Vu, 1937; Tracol-Huynh, 2010).

During the Vietnam-American war, sex work in North Vietnam was rarely documented, but in the South, it became a major industry, especially around U.S. military bases. Women, many displaced by American bombing campaigns, often turned to sex work out of desperation (Lewis, 1972; Ngo, 2013; Tagliacozzo, 2008). Although illegal, prostitution was tacitly accepted and even exploited by South Vietnamese officials for economic gain, turning cities into hubs of commercial sex and leaving long-term social consequences for the women and their children (Tagliacozzo, 2008).

The focus of this sub-project, however, is on the governance of female sex workers' bodies, labor and moral discourse in contemporary Vietnam, in comparison with governance of female bodies, labor and narratives in the Gulf States and Europe. Details are as follows.

The Vietnamese government's perception and administration of prostitution have evolved in accordance with the economic and political evolution of the nation. Between the end of the war with the U.S. in 1975 and the neoliberal economic reform in the late 1980s, prostitution was considered a

vestige of war. During this time (1975-1986), prostitution was explicitly repressed and condemned as an example of the "depraying nature" of the former American-influenced, capitalist society (McMahon, 2002; Nguyen-vo, 2008). Sex workers were referred to as "girls who shame[d] the city" [1] and "all activities of prostitution brothels, dancing shops, smoking shops and all enslaving, depraving American-styled cultural activities [were] strictly prohibited" [2] (Sài Gòn Giải Phóng, May 6, 1975). On March 8, 1976, in an article titled "We must save our children" ("Phải cứu lấy những con em chúng ta"), the Sài Gòn Giải Phóng newspaper cited Đỗ Thi Duy Liên - member of the Revolutionary People's Committee and director of the Department of War Invalids and Social Affairs of Hồ Chí Minh City [3]- called sex workers the most oppressed, despised and pitiable victims of the former regime [4]. Liên called for on-site mass campaigns against social evils (phong trào quần chúng bài trừ tệ nạn xã hội tại chỗ), including prostitution. Former sex workers were also to be reeducated in centralized rehabilitative education (giáo dục cải tạo tập trung) which was housed in schools for women's dignity restoration (trường phục hồi nhân phẩm), colloquially called "camps" (trai). In these schools, former sex workers were often confined for six months or more to be treated for venereal diseases, learn to read and write, and were trained in crafts such as making baskets and doormats (Richard Dudman, 1977). Former sex workers are said to have been mistreated and detained for years in these camps (see Trương, 2012).

This period illustrates how the Vietnamese government sought to reassert ideological and moral control by regulating female bodies and labor through punitive measures. Prostitution was not merely suppressed as a social issue but framed as a symbolic threat to the revolutionary order and to national dignity. Through reeducation camps and moral campaigns, the state exercised disciplinary power over women's sexuality and economic choices, casting sex workers as both victims of the past regime and subjects to be reformed. This approach reveals a broader strategy of governance where the female sex worker's body became a site for asserting postwar socialist values and reconfiguring the nation's social fabric.

II.1.2. Shame, Exclusion, and Aid: Vietnam's Dual Management of Sex Work

Since prostitution was defined as a threat and an ongoing social problem needing tackling, it created opportunities for new forms of state control and apparatuses (Nguyen-vo, 2008). According to Nguyen-vo, the existence of prostitution buttressed and expanded the jurisdiction of various civil sectors that handled prostitution-related issues, such as Public Health and Security (Nguyen-vo, 2008). Not only did the strong presence of commercial sex showcase the relevance and legitimacy of various state organs, it also benefited them in their process of tackling the prostitution problem "through forms of advancement, jobs, bonuses, or outright corruption" (Nguyen-vo, 2008, p. 249). In

her research, the public health sector induced profit to be made on the health market through its education of consumerist choices (eg., condoms and hygiene products) and grants from international NGOs; and the police benefited from "a large piece of the pie of commerce related to the very vice and crime they suppress" (p. 249). All things considered, the neoliberalist respect for entrepreneurial and consumerist freedoms has to be ensured to propel a growing economy (Nguyen-vo, 2008).

Seen from this light, sex work has created job opportunities, not only for sex workers themselves but for those who tackle, administer and regulate – in another word, govern – sex work. However, sex work itself is not recognized as work. Before the promulgation of the *Law on Handling Administrative Violations* (*Luật Xử Lý vi Phạm Hành Chính*) in 2012, all acts related to prostitution, such as pimping, housing sex work, and selling and buying sex were considered criminal offences. After the 2012 law, prostitution is still illegal in Vietnam, but the acts of selling and buying sexual services have been decriminalized and treated as administrative violations.

By refusing recognition to sex work as a valid form of labor, the state relegates sex workers to a space of illegitimacy, where they are denied rights and visibility, yet paradoxically made hyper-visible as objects of discipline and reform. This structural illegitimacy produces a cycle of precarity: excluded from formal employment protections, welfare schemes, and healthcare systems, sex workers are forced into increasingly vulnerable positions, both economically and physically. For example, as a consequence of COVID-19, street sex workers' mobility was limited, leading to a substantial loss of income. However, many of them did not receive the cash support provided many times by the government since they did not apply due to fear of stigmatization and discrimination (United Nations Vietnam, 2021). Similarly, while supportive financial programs are available, they often require documents such as stable job records like a payment slip or a labor contract, which sex workers do not possess due to the illegality of sex work, resulting in their exclusion from these programs (Lainez et al., 2020). According to Lainez and colleagues (2020), this pushes many sex workers to resort to informal credit services and even usurers for loans, which subject them to much higher interest rates and sometimes even danger of violence when most usurers are also local gangsters.

Sex workers are also exposed to other vulnerabilities besides economic exclusion. According to Pateman (1988, 1999), the "embodied nature" of prostitution makes sex workers much more exposed to danger and violence than women of other professions. They also encounter many other significant risks, such as legal discrimination and harassment, health problems, and cultural stigmatization particular to their work (Sullivan, 2020). Vietnamese studies have reported on the exploitation and abuse of prostitute women not only by pimps, gangsters and clients (Ngo et al., 2007), but also by the police (Nguyen-vo, 2008) and even NGOs (Hoang, 2016). The authorities targeting prostitute women and not male clients might also exacerbate these women's ordeals. Treatment of prostitution-related agents (e.g., sex workers, male customers, and customers' wives) has been reported to be class-based and more repressive measures are applied on lower-class prostitute women (Nguyen-vo, 2008; Hoang, 2016). Violence related to their job, which is relatively frequent, is not routinely addressed (Rushing, Watts & Rushing, 2005). Their health problems as a byproduct of the job constitute another aspect of their vulnerability (Ngo et al., 2007; Le, D'Onofrio, & Rogers, 2010; Yu, Clatts, Goldsamt, & Giang, 2015). For example, a significant portion of clients of female sex workers were reported to be drug users, thus exposing the sex workers to a high risk of contracting HIV (Tran, Detels, Hoang, & Hoang, 2005). In addition, sex workers' fear of stigma from

health professionals and society in general also negatively affects their access to healthcare services (Huber et al., 2019).

Due to the magnitude, prevalence, lucrativeness, and the fluid and diverse forms of the sex/intimate industry in Vietnam (Nguyen-vo, 2008; Hoang, 2015), eradicating it would be highly unlikely. The Vietnamese state does not pursue an eradication policy either, albeit the occasional raids on establishments suspected of housing prostitution. These raids seem to be performative and oftentimes performed during a prominent political affair. For example, before U.S. president George Bush's visit to Vietnam prior to the country's accession to WTO in 2006, a 5-year and 30.5-million-dollar campaign was launched to crack down on prostitution, shutting hundreds of bars and karaoke lounges, arresting sex workers, especially the more vulnerable street walkers without connections to the authorities (Hoang, 2015). According to David Koh (2001), when a raid was to happen, local authorities might tip off establishments to get rid of evidence of illicit activities, including prostitution, before the police or authorities appeared. Besides, pursuing an eradication of prostitution would also mean risking the devastation of various economic transactions of the "hooking economy" – the economy that significantly relies on connections facilitated by sex workers in hosted bars.

On the one hand, the Vietnamese state employs the "social evils" approach, which demonizes sex workers through a moral framework that relies on an "economy of shame" to teach women responsible behavior to avoid falling victim to traffickers (Voelkner, 2017). On the other hand, as Vietnam seeks integration into the developed world through economic partnerships that require adherence to certain humanitarian protocols, the Vietnamese government has increasingly adopted a more humanitarian approach towards sex workers. For example, the Vietnam Women's Union is increasingly casting itself as an NGO despite being the representative of state feminism (London, 2014). Accordingly with its NGO role, the Union has forged partnerships with numerous international aid endeavors focused on enhancing the economic and social standing of women in Vietnam, including sex workers (Waibel and Gluck, 2013; Vijeyarasa, 2010). The Union actively engages with both international and local researchers studying women and marginalized groups in Vietnam (London, 2022).

According to Kimberly Hoang (2016), this humanitarian approach is sometimes distorted to being a "perverse humanitarianism" approach wherein women can be exploited by the very NGO that claims to be helping them. According to Hoang, similar to the cases in China, Thailand, and the U.S., rescued women in Vietnam can be further exploited by NGOs' market-based "training," which requires them to sew, cook, and clean for the organization under the guise of preparing for factory or service sector jobs. Furthermore, NGOs and government agencies often conflate consensual sex workers with trafficking victims (Hoang, 2015 & 2016). To those who want to escape forced sex work, these agencies offer very limited job opportunities and usually very low wages (Lainez, 2019), whereas those who do not wish to give up sex work feel frustrated at the agencies' paternalism and insistence on identifying sex workers as victims (Hoang, 2015 & 2016). Additionally, while humanitarian method prescribes help for victims including food, shelter, rehabilitative activities, vocational training, and so on, the "social evils" approach stigmatizes them for having engaged in sex work or for having been sexually abused (Tucker et al., 2009; Vijeyarasa, 2010; Hoang, 2013).

This dual treatment of sex work and sex workers can be seen as an illustration of Vietnam's economic reforms at large, which attempt to maintain socialist and state-sanctioned traditional

values while simultaneously exhibiting exploitative, capitalist behavior, trying to cater to the global capitalist system. The approach is dual, yet selective. According to Nguyen-vo (2008) and Hoang (2015), while implementing repressive measures against low-end and street prostitution, the state tolerates wealthy elite businessmen to engage in activities involving commercial sex work, to a certain extent.

Across Vietnam's shifting economic and political landscapes, the governance of prostitution has served as a powerful mechanism for regulating not only labor, but also the female body, moral narratives, and legitimacy in society. From the postwar reeducation camps to contemporary campaigns against "social evils," sex work has been strategically framed first as a vestige of a backward and degraded former regime, then as a symptom of neoliberal (dis)order. These shifting discourses have enabled the Vietnamese state to consolidate control by positioning women's bodies at the intersection of ideological purity, public health, national identity, and economic utility. Being denied the status of legitimate labor while still being capitalized on, sex workers are highly visible as targets of regulation but invisible when it comes to recognizing their rights as citizens. The dual framework where the "social evils" discourse stigmatizes and the "humanitarian" discourse paternalizes ultimately maintains women's economic and social precarity. Whether cast as victims in need of rescue, delinquents in need of reform, or workers to be re-trained under humanitarian pretexts, sex workers remain subject to systems that erase their agency while legitimizing the authority of state institutions and collaborative NGOs. This framework enables the state to police boundaries of respectability, class, and morality, using sex workers as symbolic figures through which national identity, modernity, and order are constantly negotiated. Thus, the control over female sexuality becomes not just a question of vice suppression or public health, but a deeply embedded strategy of governance, which sustains Vietnam's political authority, economic adaptability, and cultural legitimacy in a rapidly globalizing world.

II. 2. Case Study 2: Gulf States

II.2.1. Governing Feminized Migration in the Gulf: Gendered Control and Legal Frameworks

Migration has become one of the defining features of global inequality, especially for women from the Global South. Across the Gulf Cooperation Council (GCC) states, millions of female migrants mostly from South and Southeast Asia and East Africa work in domestic labor, caregiving, and service sectors under restrictive legal systems. Their migration is not simply an individual choice, nor a purely economic necessity. Rather, it unfolds within a broader landscape of governance that controls women's mobility, regulates their labor, and disciplines their bodies (Pécoud & Thiollet, 2023).

This section examines how migration governance in the Gulf States specifically targets and regulates female migrant labor through intersecting legal, economic, and cultural mechanisms. Central to this system is the *kafala* (sponsorship) regime, which ties women's residency status to their employers, severely restricting their mobility and autonomy. Combined with prevailing social norms and labor hierarchies, this framework creates a racialized and gendered system that renders domestic and care work both indispensable and morally suspect. While the structures of control are formidable, migrant women are not merely passive subjects. Instead, they navigate, resist, and repurpose these constraints through everyday acts of agency whether by forging solidarity networks, strategically switching employers, or challenging exploitation. This analysis situates the Gulf States as a compelling site to explore the complex interplay between governance and feminized migration,

contributing to a broader understanding of how power operates on women's bodies and labor across borders.

This case study forms part of a broader comparative inquiry into gendered governance in Vietnam, the Gulf States, and Poland, highlighting both shared mechanisms of control and diverse strategies of resistance across political and cultural contexts.

Global Trends and Gulf Realities Women now make up a significant portion of the world's 281 million international migrants. According to the International Labour Organization, women constituted approximately 48% of all international migrants in 2020, and around 38.7% of global migrant workers in 2022 amounting to nearly 65 million female workers (International Labour Organization, 2022).

The GCC countries exemplify this shift. Out of a total population of around 57 million, more than 30 million are migrants and millions of them are women, predominantly concentrated in domestic and caregiving sectors. For example, in Saudi Arabia, over 1.5 million women work as domestic helpers, mostly from the Philippines, Indonesia, and Sri Lanka. In the UAE, female domestic workers account for over 90% of the sector. Additionally, across the GCC, female migrants are disproportionately concentrated in jobs with the lowest protections and highest exposure to exploitation, such as live-in domestic labor. These women are not only essential to the functioning of Gulf households and cities but also to the economies of their home countries. Remittances from GCC states exceeded \$130 billion in recent years, with a substantial share sent by female workers (Wagle, 2024).

Yet, despite their foundational role, these women often remain legally invisible and socially marginalized. Their labor is undervalued, their mobility restricted, and their presence framed as temporary and replaceable. Even as they prop up national economies and global care chains, their contributions are dismissed as "unskilled," and their bodies subjected to surveillance. These dynamics reflect how migration governance in the Gulf simultaneously depends on and devalues the female migrant.

Migration policies in the GCC are often justified in technocratic terms as national security, labor regulation, or economic planning. But a closer look reveals that these policies also operate as technologies of social control, especially over women. The *kafala* system, the cornerstone of Gulf migration governance, ties a worker's legal status to a single employer, granting the sponsor immense power over their employee's mobility, residence, and employment status (Jones, 2016).

While the system has enabled millions of women to access work abroad, it also institutionalizes dependency and facilitates abuse. Female workers cannot easily change jobs, leave the country, or seek legal recourse without the sponsor's permission. In the case of live-in domestic workers who are excluded from most labor laws, the lack of oversight exposes them to physical, psychological, and sexual exploitation.

Crucially, these legal structures do not exist in a vacuum. They intersect with cultural and racial hierarchies that define women by nationality, class, and perceived moral worth. South Asian or African domestic workers, for example, are frequently subjected to moral scrutiny, while their employers enjoy near-total impunity. Meanwhile, the legal system reinforces this imbalance by excluding domestic labor from standard labor protections, effectively rendering these women outside the scope of rights.

This governance model sustains a paradox: it depends on the continuous supply of female migrant labor but treats that labor as morally suspect, legally precarious, and socially subordinate. By doing so, it reproduces a racialized and gendered division of labor in which migrant women are necessary but unworthy of full personhood or protection.

II.2.2. Gendered Vulnerabilities and Profitable Governance: Labor Markets, Kafala, and the Commodification of Women

While all migrants face obstacles, gender profoundly shapes the nature and degree of vulnerability. For women, migration is not merely a movement across borders but a shift into a system that often reinforces gendered subordination. In the Gulf context, governance frameworks such as the *kafala* system intersect with patriarchal norms, creating a layered structure of dependency. For female domestic workers in particular, the employer's home becomes both workplace and site of confinement, often without clear boundaries between work and personal time (Yang et al., 2024).

These vulnerabilities are exacerbated by limited access to justice, isolation, and fear of deportation. Women who are victims of abuse rarely report their experiences, fearing retaliation, shame, or disbelief. In many cases, their passports are confiscated, and their communications monitored. Even when legal protections exist, enforcement is weak, and legal pathways for redress are inaccessible due to language barriers, costs, or fear of authorities (Ali & Cochrane, 2024).

Importantly, gender-based vulnerabilities are not static; they are produced and maintained by governance systems. The exclusion of domestic workers from national labor laws in countries like Saudi Arabia or the UAE reflects not a legal oversight but a deliberate form of gendered labor control. Migrant women are essential yet disposable, present everywhere yet formally unrecognized.

The governance of female migrant labor in the Gulf is not only about control, it is also about profit. The region's labor policies, especially *kafala*, are designed to facilitate cheap, flexible, and disposable labor that powers construction, caregiving, and service sectors. Women are overrepresented in domestic work, where oversight is minimal and dependency is maximal. Their labor is depersonalized and commodified, often treated as an extension of household infrastructure rather than as professional service (Fernandez, 2021).

This commodification is lucrative not only for employers but also for recruitment agencies, middlemen, and state institutions. Recruitment fees, residency permits, visa renewals, and remittance systems are all revenue-generating. In this context, the migrant woman is not merely a worker; she is also a source of economic extraction, her labor regulated for others' gain (International Labour Organization, 2022).

However, this system is not entirely exploitative. As noted earlier, it offers structured, state-sanctioned migration for women who would otherwise be trapped in poverty. The *kafala* framework has enabled millions to access work, often with housing and basic healthcare provided. Compared to unregulated smuggling routes, the system offers a degree of safety and legitimacy.

Yet, this safety comes at a price. Migrant women's freedom is often the cost of access, as their legal status remains tethered to an employer's will. The challenge, then, is not to dismiss the entire system but to reform it, maintaining its benefits while dismantling its exploitative mechanisms.

II.2.3. Reform and Its Limits

In recent years, some Gulf Cooperation Council (GCC) countries have introduced high-profile legal reforms aimed at improving the conditions of migrant workers, particularly in response to international scrutiny ahead of major global events such as Expo 2020 in Dubai and the 2022 FIFA World Cup in Qatar. These reforms have included partial modifications to the *kafala* (sponsorship) system, such as allowing workers to change employers under certain conditions, the introduction of minimum wage laws in some sectors, and enhanced labor dispute mechanisms (Saraswathi, 2022).

Despite these policy shifts, the impact of reform has remained limited in both scope and implementation. First, most reforms are sector-specific primarily targeting skilled or semi-skilled workers in construction and hospitality while the most vulnerable group, domestic workers (many of whom are women), continue to be excluded from core labor protections. In many GCC states, domestic work is governed by separate legislation that lacks the enforcement mechanisms and comprehensive guarantees found in general labor law (Amnesty International, 2021).

Second, even when progressive reforms exist on paper, enforcement remains weak. Labor inspections are often limited or absent in private homes, where many migrant women work. Fear of retaliation, deportation, or non-renewal of contracts discourages workers from reporting abuse, especially in a legal environment where employers still retain significant control over their workers' mobility and residence.

Moreover, these reforms often serve a dual purpose: to signal modernization and global integration while avoiding structural change. Governments tend to frame improvements as evidence of progress, while downplaying the persistent power imbalance between employers and workers.

Finally, reforms that are not embedded in broader strategies to redistribute power or recognize migrant agency remain fundamentally limited. Migrant women are still not consulted in the policy-making processes that affect their lives. Without institutionalized participation, accountability mechanisms, and a rethinking of the structural economic dependence on vulnerable labor, reforms risk becoming performative rather than transformative.

As scholars argue, reform under authoritarian governance structures often functions more as risk management than rights advancement (Hertog, 2020). In the case of migrant women in the Gulf, progress requires more than legal tweaks; it demands a paradigm shift that centers their voices, protects their autonomy, and reconfigures the social contract between host states and migrant labor.

II.3. Case Study 3: Poland

II.3.1. Information Chaos and the Spread of Disinformation in Europe

Information disorder has become a prevalent issue in the contemporary world. The Global Risk Report published by the World Economic Forum (2024), estimated that disinformation and misinformation are going to be some of the major global risks anticipated in the next few years. While the omnipresence of digital technologies and the possibility of misusing them to manipulate information is a constant risk, the danger of spreading false information is growing during political conflicts, including political elections or geopolitical tensions, as well as during economic uncertainty and social transformations, which might lead to serious socio-political consequences. The possibility

of manipulating information is becoming distressing for the population as false information and narratives are more commonly circulating in our society and, according to the global survey, 80 percent of responders are concerned about the impact of disinformation on society and political events (Ipos - UNESCO, 2023). Similarly, 82 percent of Europeans agree that false and misleading information or news are a problem for democracy (European Commission, 2024). In the case of Poland, 40 percent of Poles are concerned about the false or misleading information circulating in both online and offline spheres and consider it as one of the most serious issues to democracy in Poland (European Commission, 2023). Additionally, 35 percent believe that "propaganda and false/misleading information from a non-democratic foreign source" is a serious threat to Polish democracy (European Commission, 2023).

Disinformation is often defined as a deliberate effort to polarize society and public opinion by inciting a specific reaction, including socio-political and economic response. The aim is to weaken public trust toward public institutions and "harm democracies by making it difficult for citizens to make informed decisions" (Chałubińska-Jentkiewicz et al., 2023, p. 96). Thus, intentionally spreading false or misleading information with malign intent should be treated as "a weapon of political influence" (Jankowicz et al., 2021, p. 4).

While the political consequences of disinformation have been particularly discussed in studies on disinformation, its socio-cultural aspects have not been considered enough. However, as Lelo and Caminhas noted, "the potential for circulation of these unfounded narratives stems from their link to the country's sociocultural context, which would, therefore, amplify their reverberation in public opinion" (2021, p. 182). The socio-cultural background, political climate, coded and context-based language, as well as media environment and digital literacy, all impact the spread of disinformation and the public social reaction and resilience to it.

In Poland, disinformation itself had been a little known phenomenon until the COVID-19 pandemic. According to Zadroga (2023), before the pandemic, the political class as well as the public were not too focused on the potential harm caused by the spread of false information and narratives. However, the declining trust in news sources and scepticism toward public information could have been observed for a while. As concluded by the European Commission in their survey in 2018, 48 percent of Poles believed that they encounter news or information that misrepresent reality or is strictly false every day or almost every day. Additionally, 49 percent and 46 percent respectively believed that the existence of false news or information is a problem in Poland and is a problem for a democracy in general (European Commission, 2018). This uncertainty toward the quality and truthfulness of information allows for a specific vulnerability to disinformation.

However, since 2022, the rapid rise of awareness regarding disinformation occurred due to Russia's full-scale invasion of Ukraine. The geo-political instability and conflicts, which also strongly impact economic situations, are other factors that create an environment exposed to false news, information and narratives.

Chałubińska-Jentkiewicz and colleagues (2023), in their research regarding disinformation trends and social awareness of disinformation in Polish society, noted that climate and energy were two fields mostly affected by disinformation (52 percent), followed by health-related disinformation (44 percent), the majority concerning the COVID-19 pandemic, and new technology information (17

percent). The false or misleading information regarding the political arena was also prevalent (22 percent).

While the harmful effect of disinformation is particularly studied in relation to political information. The medical and climate disinformation has also been strongly criticized and emphasized in its potential harmful impact on society. Comparatively, gendered disinformation has been oftentimes overlooked as it is viewed much more like a personal harassment or a threat to an individual rather than a potential threat to public discourse, democracy and democratic institutions or national/international security.

Thus, the following analysis focuses on the governance of female politicians' public image in Europe, particularly in Poland, through the use of disinformation to undermine their place in leadership.

II.3.2. Gendered Disinformation and the Governance of Women's Public Image

Due to the vast amount of information chaos, an increasing number of false narratives regarding politicians is oftentimes circulated in the months leading to the political elections, whether parliamentary, local, presidential, or European. Whether the information is shared with malignant intent (disinformation) or inadvertently shared (misinformation), false information and narratives have the potential to influence how society as a whole or particular groups within society perceive political candidates, political environment, and reality. Disinformation campaigns often focus on current domestic and international events in an attempt to polarize society. Those campaigns often target both political candidates and their parties and aim to discredit their competence and thus interfere with their chances of being elected.

Attempts to discredit political figures are nothing new. However, there are certain differences in the disinformation targeting male politicians versus those regarding female politicians. The concept of gendered disinformation explains those differences. Gendered disinformation is often defined as an intentional spread of false information or narratives aimed to harm, discredit or undermine a person based on their gender (Kotowska, 2024). Gendered disinformation oftentimes exploits gender stereotypes such as emotional instability or immorality and social and political conflicts around gender. Additionally, it falls into a grey zone as the influx of information creates the situation where the false information appears as believable news or narratives, often addressing polarizing issues, making it extremely difficult to differentiate falsehood from truth.

In recent years, several female politicians faced numerous narratives aimed to erode their credibility or weaken their chances of being elected. For instance, during the 2023 Slovak Parliamentary Elections, President Čaputová was called an American agent, accused of promoting foreign interests and betraying the Slovak nation (CEDMO, 2023). Similarly, Timea Szabó, a Hungarian politician and journalist, was accused of being an "internationally trained agent" involved in anti-Hungarian activities and wishing to destabilize the country (Di Meco & Hesterman, 2023, p. 20). Being untrustworthy and disloyal to the country is a prevalent theme found in misleading information, often used to shut down criticism of the government or certain debates, especially those around migration and refugees. This theme also paints the image of female politicians as more self-centered rather than as representative of the nation and its interest. This perception of not being a proper representative of the state and the people or having foreign interest above the national, strongly impacts the possibility of being elected.

Another common theme in false information against women is sexualization. Sexualized claims are often used to discredit female candidates' competence and morality. One of the examples of this type of disinformation is the case leading to the Polish Parliamentary Elections in October 2023: a picture posted online allegedly showed a female candidate who, instead of working, was partying and drinking (CEDMO, 2023). The image turned out to be a fragment of a publicly available photograph, and the fact-checking organizations declared that the woman in the picture was not a political candidate. Another example can be found in Georgia, where several female politicians were victims of gendered disinformation campaigns during the run-up to parliamentary elections in 2016. The series of doctored videos and images, purportedly showing candidates, were disseminated on social media platforms in order to destroy their reputation, discredit their credibility, and polarize society (Jankowicz, 2017).

Disinformation sexualizing the candidates undermines female candidates' professionalism and credibility. As Kotowska (2024) noted, these types of false narratives reinforce stereotypes that women, including politicians, are innately sexualized and inappropriate and target female politicians across political affiliations. Additionally, this theme not only dismisses female politicians' credibility and competence, it also questions their moral character and, thus, undermines their place in leadership positions as unfitted and unworthy.

The emotional instability is yet another theme often exploited by gendered disinformation. The purported lack of emotional stability is harmful not only to female politicians but to any politician due to the fact that voters and the population generally prefer the representatives who are presented and perceived as rational and logical. The inability to control one's emotions is an undesirable quality, particularly in politics, as it might lead to tensions and misunderstandings. However, this lack of emotional stability and rationality is found and replicated by gender stereotypes. While throughout history there were several examples of emotional actions by both male and female politicians, the inability to control one's emotions is mostly attributed to female politicians and candidates. Gendered disinformation skillfully uses this stereotype to create an unflattering image of women in power positions. For example, the Polish female Parliament candidate had been misidentified in the video of a woman screaming at a rally, and while it has been clarified that the politician was in another city delivering a speech during that time, some voters continued to criticize the politician and her assumed emotional instability (Kotowska, 2024).

According to Kotowska (2024), who analyzed gendered disinformation in Polish cyberspace, the most common themes found in false information and narratives are heavily based on gender stereotypes and focus on intelligence, emotional state, physical appearance, and motherhood. The gender stereotypes, socio-cultural and political environment, coded and context-based language, as well as media literacy, all affect not only the creation and spread of false narratives but also the possible impact on society. While all politicians are targets of disinformation campaigns, male candidates are more targeted due to their political stances and actions.

The growth in false and misleading information and narratives is considered as a serious threat to national and international policies and communities. Scholars argue that political instability, social polarization, economic situation, and lack of trust in international and domestic democratic institutions and media credibility create an environment vulnerable to disinformation. Political disinformation is rightfully seen as a risk to democratic institutions and voters to make informed decisions. Medical disinformation is another type that has been highlighted in its potential to harm

society and national/international politics. Disinformation based on gender is, however, mostly seen as an individual problem or harassment rather than a possible threat to the nation, its public institutions and security. Nevertheless, Kate Saner argues in her presentation on gendered identity disinformation (2025) that this type of false narratives and information should be seen as a tool for systematic discrimination and a security threat rather than simply an individual issue. Thus, as Saner (2025) noted, gendered disinformation is a multi-vector threat that is impacting at an individual level by undermining human rights; at systemic level by degrading democratic resilience and social cohesion; and at a national/international level as it is a threat to security.

Systematic use of disinformation against women, including against women in power positions, reinforces and emboldens social norms and stereotypes, emphasizes social tensions, while often concealing political motives. Disinformation aims to divide society and hinder voters from making informed decisions or simply discourage them from voting. Gendered disinformation relies on gender stereotypes and digital literacy that uses false or deceptive information about women, particularly prominent female figures, to limit women's participation in the public sphere and therefore influence the political direction of the country.

It must also be acknowledged that while recognizing and combating false information are becoming necessary skills, simultaneously, respecting the freedoms of the press, expression, and access to information must be preserved.

While institutional and discursive mechanisms are in place to regulate women's bodies, labor, and narratives, these mechanisms are never absolute. Across the contexts studied, women are not solely subjects of control, but agents who negotiate, adapt to, and subtly resist these structures. The following section turns to the everyday practices through which women reclaim autonomy, assert voice, and reshape the conditions imposed upon them, even within tightly regulated systems.

III. Women's Agency and Resistance

Resistance takes many forms, including economic, symbolic, legal, emotional, or digital. Whether navigating state surveillance, labor exploitation, or public shaming, women continue to subvert, adapt, and reimagine the boundaries imposed on them. The following three case studies analyze how women in Vietnam, the Gulf, and Poland challenge dominant structures through informal networks, strategic compliance, and digital literacy. These moments of agency offer insight into how governance is not only a site of domination but also a space of feminist struggle and transformation.

III.1. Case Study 1: Vietnam

Despite the Vietnamese state's persistent efforts to define and discipline sex workers through punitive policies and moralizing discourses, women engaged in sex work have not remained passive recipients of control. Instead, they have developed diverse strategies of negotiation, adaptation, and resistance that challenge the regulatory frameworks imposed upon them.

One key site of resistance lies in the very act of continuing to engage in sex work of various forms and niches despite its legal ambiguity and intense stigma. In doing so, many women assert their right to economic autonomy and survival in a context where incomes from formal employment remain inadequate. As Hoang (2015) documents, many women in the sex trade actively calculate risks, shift between different sectors of the industry, and build networks of clients and patrons to

stabilize their income. This form of economic pragmatism constitutes a rejection of the victim narrative imposed by both the state and NGOs, and affirms sex workers' role as strategic agents navigating a hostile social and legal environment.

Sex workers also resist through forms of identity-making and community formation. Rather than totally internalizing the dominant narratives of shame and degradation, some women reframe their work as a form of sacrifice or care for their children, parents, or partners. Instead of shame, some take pride in being able to provide for their family from their sex work. This moral reframing allows them to retain dignity and agency within a stigmatizing cultural framework (Hoang, 2013; Lainez, 2019).

Furthermore, sex workers' resistance often takes shape in how they respond to state repression and law enforcement. Some learn to navigate police routines, use bribery strategically, or gain protection through informal relationships with local officials. While these tactics may appear to reinforce systems of power, they also expose the limits of the state's control and the porousness of its moral authority. According to Lainez (2020), sex workers' ability to anticipate and adapt to state crackdowns – by relocating, changing clientele, or leveraging social ties – demonstrates a form of embodied knowledge and resilience grounded in lived experience.

Even in contexts of humanitarian intervention, where women are cast as victims to be "rescued," many sex workers resist imposed rehabilitation narratives. Hoang (2016) documents how women subjected to vocational training programs often reject the low-paid, feminized labor they are expected to accept, such as sewing or cleaning, insisting instead on the greater financial autonomy afforded by sex work. Some even overtly challenge NGO workers' narrative by pointing out that they earn more money through sex work than the NGO workers' salary. In this rejection lies a powerful critique of both state developmentalism and neoliberal "empowerment" discourses, exposing how policies aimed at rescuing women often reproduce the same structures of gendered labor exploitation they claim to challenge.

Taken together, these practices reveal that Vietnamese sex workers are not merely acted upon by systems of control, but are active agents who constantly negotiate the boundaries of legality, morality, and survival. Their actions constitute meaningful forms of resistance that expose the contradictions of governance and the inadequacy of dominant narratives. In reclaiming their labor, reframing their identities and narratives, sex workers contest the state's monopoly over legitimacy, morality, and control of the female body.

A similar pattern of agency can be found in the case of the female migrants in the Gulf States.

III.2. Case Study 2: Gulf States

Despite the structural vulnerabilities and systemic obstacles embedded in global migration regimes, the migration journey often opens up unexpected pathways for empowerment and self-determination, particularly for women from rural, impoverished, or socially marginalized communities. For many of these women, migrating to the Gulf is not simply an act of desperation or necessity; it is a conscious, strategic decision shaped by complex motivations. Migration becomes a vehicle through which women seek economic independence, escape domestic violence or patriarchal oppression, secure their children's futures, and claim autonomy over their own lives.

Paradoxically, the Gulf region frequently criticized for its restrictive migration regimes has, through the *kafala* system, offered structured migration channels that many women perceive as more accessible and attainable than those of liberal democracies. While deeply flawed in design and implementation, the *kafala* system lowers the financial and bureaucratic thresholds to migration by requiring sponsors to cover visa, travel, and housing costs. For women who would otherwise be excluded from global labor markets due to illiteracy, poverty, or a lack of capital, this system creates a legal, if limited, corridor to labor migration. In this way, it functions intentionally or not as a state-regulated alternative to dangerous and exploitative irregular migration routes, such as smuggling or trafficking (Crépeau, 2018).

Once in the host country, many migrant women actively and strategically use their earnings to reshape their social realities. Their remittances serve as lifelines for families left behind, paying for siblings' education, medical care, land purchases, and even entrepreneurial ventures. These financial contributions have macro-level implications as well: migrant women's earnings fuel household economies, contribute to national development in their origin countries, and maintain transnational family networks. This economic agency can radically shift gender roles at home, with some women returning as respected breadwinners and decision-makers.

But empowerment through migration is not confined to financial independence. Migrant women in the Gulf often acquire new skills, linguistic abilities, and a broadened worldview that foster psychological resilience and a heightened sense of self-worth. They demonstrate agency even within oppressive structures. They learn how to negotiate their contracts, communicate across cultural barriers, navigate legal systems, and assert boundaries with employers. These experiences, though often difficult, become sites of transformation.

Importantly, empowerment and agency are enacted not only through success stories or formal processes, but also through the everyday practices of survival and resistance. In the face of exploitative systems, many migrant women develop informal networks of solidarity, WhatsApp groups, prayer circles, rotating savings clubs, or shared housing arrangements that serve as platforms for mutual care, information exchange, and collective strength (Jureidini & Reda, 2021). Through these spaces, women share tips on avoiding abuse, locating supportive employers, accessing medical care, and resisting employer control.

Some women take bolder steps: changing employers through informal channels (Fernandez, 2014), refusing excessive workloads, or reporting abuse to labor courts, sometimes with the aid of NGOs or embassies (Migrant-Rights.org, 2022). Others exit the formal labor system altogether and move into freelance or informal work in cleaning, hospitality, or childcare, where they may experience greater autonomy, despite losing legal protections (Parreñas, 2001).

These micro-practices subtle, quiet, and sometimes invisible reveal how power is negotiated and contested in the daily lives of migrant women. As Mahdavi (2013) and Anderson (2010) argue, resistance does not always take the form of open rebellion; it often lies in small gestures, calculated decisions, and survival strategies that defy narratives of passivity. These women are not merely acted upon by the system; they act, improvise, and subvert.

Their experiences cannot be reduced to narratives of victimhood alone. They are also stories of strength, creativity, and the refusal to be broken. Through migration, these women challenge not only the economic and gender hierarchies that excluded them in their home countries but also the power

structures that seek to contain them in the host countries. As James Scott (1990) described in his seminal work, these "weapons of the weak" are critical to understanding the moral and political agency of marginalized groups operating within constrained environments.

In short, the migration experience of women in the Gulf is not a linear journey from exploitation to empowerment, but a complex, negotiated process filled with contradiction, adaptation, and resistance. It demands a rethinking of how we define agency: not merely as freedom from constraints, but as the ability to maneuver within them, to carve out space, however limited, for dignity and voice.

In the following case study of Poland, we can find a similar resilience among women politicians in their practices to resist false narratives.

III.3. Case Study 3: Poland

Because of the growth of the disinformation, the response on the national and international level seems obvious. Resilience to false information and narratives involves a multi-faceted approach and includes numerous actors.

Media pluralism, situational awareness toward online platforms and analysis of open-source information, increasing societal resilience through media and digital literacy, as well as cooperation with numerous institutions such as national authorities, academia, NGOs or media are all part of the European Union response to the challenge of disinformation spread (European Commission, 2025). Several countries, as well as the European Union as a whole, have either introduced specific legislation that addresses the disinformation or proposed other laws and regulations that could be used as actions against disinformation. However, while generally acknowledging that disinformation based on gender is an issue, preventing and tackling this type of disinformation still mostly relies on the work of women's rights organizations.

One of the goals of the disinformation is to reduce one's credibility and discourage public involvement. Thus, simply through continuity of work and public appearances women resist the attempts to discredit their competence and image. By continuing their activities they assert their right to the public sphere and socio-political independence.

Additionally, the initiatives to strengthen media and digital literacy are some of the main actions taken by both national and international organizations as well as public and non-public organizations. The turn to the internet as a leading news source, combined with the decreasing trust in quality journalism and media organizations, might lead to an increase in the circulation of disinformation. Even though false news and information have been circulating long before the internet, scholars noted a visible increase in the circulation of false information as the internet and social media platforms started to be treated as news outlets (Brennen et al., 2020; Malquin-Robles & Gamir-Rios, 2023). Thus, digital literacy and digital skills, especially content-related skills, that enable users to navigate the internet, are crucial as users must be able to evaluate online sources of information.

Educational actions and initiatives to widen media literacy among the population can mitigate vulnerability to disinformation. Several women's rights organizations and scholars noted the problem of gendered disinformation and identified the need for collective actions such as conferences or

workshops to not only highlight the issue but also provide knowledge and tools to identify and counter false information against women.

The growing importance of the internet has impacted women's agency as well due to its potential to broaden the reach of women's movement (by overcoming local and national boundaries). The increased participation of women in digital media and platform production also influences and shapes the internet's direction and character. While those fields are still male-dominated, there has been a growth in women's participation, including in leadership, production and design positions. The inclusion of diverse voices in the process of production affects the digital inequalities and reduces them.

Moreover, as the disinformation relies on socio-cultural and economic background, the root causes should be addressed as well. Social transformations, cultural norms, and the visibility of diverse voices impact the possibility of changes of narratives and allow the population and voters to make informed and accurate choices. Deliberate spread of false information and narratives against women, especially those in the position of power, not only impacts them but also influences the possible decisions of the people, thus affecting the democratic institutions and the peoples' epistemic rights.

Country	Legal Governance	Economic Control	Narrative/Discursive Control	Forms of Resistance
Vietnam	"Social evils" law; criminalization	Informal economy; NGO exploitation	Moralizing discourse; shame economy	Informal networks; rejection of victimhood
Gulf States	Kafala system; residency dependence	Labor extraction; remittance reliance	Morally suspect migrant femininity	Economic agency; solidarity groups
Poland	Liberal democracy; no direct law	Electoral funding gaps; digital underreach	False narratives and information	Media literacy; reclaiming digital space

Figure 1: Summary of governance of female bodies, labor and narratives across Asia and Europe

IV. Conclusion

This study has examined how governance across Vietnam, the Gulf States, and Poland regulates women's bodies, labor, and public legitimacy. In each context, governance operates beyond formal law to include moral discourse, economic precarity, migration policy, and the manipulation of information. Whether through the disciplining of sex workers in Vietnam, the containment of migrant domestic workers in the Gulf, or the undermining of the legitimacy of female politicians in Poland, governance emerges as a multi-scalar tool for defining the limits of female visibility, legitimacy, and action.

Despite differing political systems and cultural settings, all three case studies reveal strikingly similar mechanisms of control: legal ambiguity, social stigma, institutional neglect, and narrative manipulation. These tools are not applied uniformly, but they serve to render women's labor invisible,

their bodies governable, and their legitimacy conditional. Governance, in this sense, is not only a set of policies or rules; it is a field of power that constructs gendered hierarchies and enforces them through both state and non-state actors.

At the same time, this project foregrounds women's agency as active, adaptive, and deeply contextual. The sex workers in Vietnam reframe their work and build quiet networks of survival. Migrant women in the Gulf repurpose a restrictive system to gain mobility, income, and social standing. Female politicians in Poland assert their place in the public sphere despite campaigns designed to silence them. These acts may not always be loud or recognized as political, but they challenge the logic of governance by asserting moral worth, strategic autonomy, and collective solidarity.

Ultimately, this study calls for a feminist rethinking of governance not simply as a system of control, but as a contested terrain where gendered power is produced, negotiated, and at times, quietly subverted. Recognizing women's everyday strategies of survival and resistance allows us to see how governance is not only imposed from above, but also reshaped from below. This recognition, we argue, is essential to building a more just understanding of how power functions, and how it might be transformed.

Notes

- 1. An unnamed official when answering an interview by The Time's in May, 1975, said: "We must also care for the mutilated, the poor and the ill and even the prostitutes who shame the city. These girls will work to earn an honest living in the future." (https://www.nytimes.com/1975/05/25/archives/delay-in-transfer-of-power-in-saigon-stirs-spec ulation-of-a-rift.html)
- 2. According to Article 7, Announcement No. 1 Regarding the Maintenance of Order and Security Regulations issued by the Military Administrative Committee of Sài Gòn-Gia Định, "Mọi hoạt động của các nhà chứa gái điểm, tiệm nhảy, tiệm hút và mọi hoạt động văn hóa nô dịch, đồi trụy theo kiểu Mỹ đều bi nghiêm cấm."
- 3. Ủy viên Ủy ban nhân dân cách mạng, Giám đốc Sở thương binh xã hội thành phố HCM
- 4. những nan nhân bị vùi dập khinh rẻ nhất, đáng thượng nhất

This work was supported by the International Center for Cultural Studies, ICCS_NYCU (Awardee of

Research Center for the Special Fields Program, Higher Education SPROUT Project)

We sincerely thank Prof. Joyce C. H. Liu for her support and guidance.

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- chữa cháy, cứu nạn cứu hộ, phòng, chống bạo lực gia đình [Decree No. 144/2021/ND-CP on administrative penalties in the fields of security, public order, social safety, prevention of social evils, fire prevention and fighting, rescue and relief, and prevention of domestic violence]. Cộng hòa Xã hội Chủ nghĩa Việt Nam. https://thuvienphapluat.vn/van-ban/Vi-pham-hanh-chinh/Nghi-dinh-144-2021-ND-CP-xu-phat-vi-pham-hanh-chinh-linh-vuc-an-ninh-an-toan-xa-hoi-425471.aspx
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