Global Domestic Workers
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Published by Bristol University Press

Marchetti, Sabrina and Daniela Cherubini.
Global Domestic Workers: Intersectional Inequalities and Struggles for Rights.
Project MUSE. muse.jhu.edu/book/85774.

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Introduction

Domestic workers tend to universally epitomize the figure of the low-skilled, low-valued, precarious, hidden and unorganized labourer. Overwhelmingly women, migrant and working class, they are also commonly low-caste, Black and indigenous. Belonging to society’s most marginalized groups, they are largely excluded from labour protection laws and are significantly impacted by the social shifts brought about by globalization. The growth in urbanization and migration; the reconfiguration of class structures, gender norms, life-styles and families; and the structural adjustment in the Global South, coupled with the crisis of welfare and care provision in the Global North, have all shaped the sector in different and at times complex ways.

Concomitantly, since the beginning of the 21st century the situation facing paid domestic workers has increasingly garnered attention and action has been taken to improve the rights of those working in the sector. Among those making this change happen are international organizations such as the International Labour Organization (ILO) and the Commission on the Status of Women, as well as non-governmental organizations (NGOs), trade unions and grassroots domestic workers’ organizations active at national, regional and transnational levels.

As the workers themselves progressively mobilize and become more visible, paid domestic work grows in prominence as an issue of global governance, and this has led to an accompanying improvement in labour laws and policies affecting the sector. These increasingly visible mobilizations appear to challenge the boundaries between labour movements, feminist struggles and so-called identity-based activism. They may offer a space of convergence between several issues of social justice that have traditionally been seen as distinct, such as struggles for the rights of workers, women, carers, racialized minorities and migrants.

These new developments have been especially true for the years under analysis in this book, the decade 2008–18. This notable period corresponds
to what we call the ‘C189 process’, triggered by the ILO decision to put domestic work on the agenda. This process produced the first international convention regulating the sector, namely Convention No. 189 concerning Decent Work for Domestic Workers (C189), and the related Recommendation 201, adopted at the end of the International Labour Conference in June 2011 in Geneva. The convention set international labour standards for paid care and domestic work, equating the labour rights of these workers to those of other workers in ratifying countries. This crucial event at the transnational level has filtered down to the local context through myriad paths, with international standards and global campaigns on the issue being received, appropriated or resisted in different ways by institutional and non-institutional actors, including domestic workers’ organizations.

Feminist scholarship since the 1960s has used many different terms to refer to the labour that is performed in the household – connecting it to its larger function of ‘reproduction’ or to its dimension of ‘care’. While we engage with these concepts throughout the book, our research takes as its objects of analysis paid ‘domestic work’ and remunerated ‘domestic workers’ – also increasingly called ‘household workers’. Broadly speaking, domestic workers provide personal and household care in the frame of a formal or informal employment relationship, which means that they work for one or more households for a wage or for other forms of remuneration. Occupations and tasks which domestic work is considered to encompass vary across countries: workers may cook, clean, do the laundry and ironing, take care of children, the elderly and the disabled, tend to the garden or pets, or drive the family car. They may work part time, full time or on an hourly basis, and may or may not live in the home of their employer. However, domestic work is defined according to the workplace, which is the household. The familial rather than business-like character of the employers and the apparently ‘private’ nature of the home are given as justification for the discrimination that affects these jobs. This is compounded by the difficulty in defining some of the tasks involved, in measuring their productivity and by cultural assumptions around women’s and other subaltern groups’ natural disposition to care and service, upon which these tasks are based.

Such usage of the term ‘domestic work’ is consistent with the definition adopted by the ILO and, in particular, C189, which refers to domestic work as ‘work performed in and for the household’. It is also consistent with the language deployed by the global domestic workers’ movement, which provides a common English translation for several local terms used in the different national contexts (see, among others, ILO, 2013: 7). The ILO definition is an attempt to cover the broad range of domestic work that exists around the world. However, the definition has been contested by some domestic workers’ organizations. For instance, in the Indian context
many domestic workers’ organizations would prefer to narrow the definition
to that of work performed *in* the household rather than *for* the household,
since the conditions of the largely female workforce in the home, who, for
instance, engage in cooking and cleaning, are very different to those of the
predominantly male gardeners or drivers, and in practice the two groups
organize separately (Agarwala and Saha, 2018).

With these elements in mind, we went on to develop the research
project which led to this book. ‘DomEQUAL: A Global Approach to Paid
Domestic Work and Global Inequalities’ (2016–21), is a project funded by
a Starting Grant of the European Research Council, and which analysed
domestic workers’ conditions and struggles across nine countries and three
continents. In Asia, it covered India, the Philippines and Taiwan; in South
America, Colombia, Ecuador and Brazil; and in Europe, Spain, Italy and
Germany. Our goal within DomEQUAL has been to contribute to the
understanding of the multi-layered transformation that has seen domestic
work become an object of governance, conflict and negotiation, entailing
processes of political subjectification and collective organizing on the part
of a category of workers conventionally regarded as ‘unorganizable’. In our
approach, the struggles for domestic workers’ rights present a useful case for
exploring the question of how transformations of intersectional inequalities
take place in a global context. Some of the themes that emerge may
therefore contribute to a better understanding of the organized struggles
not only of domestic workers but also of other multiply marginalized
groups globally.

In the remainder of this chapter we will introduce the analytical directions
which have guided our research project by setting out the conceptual tools
and the scholarly debates we have drawn on. In the first section we argue
that domestic workers’ struggles, especially in relation to the ‘C189 process’,
represent a good case to explore how what come to be identified as ‘global
rights’, in this case the rights of domestic workers, are imported to the level
of local struggles. In the second section we argue that domestic workers’
struggles are useful in examining how intersectional politics may actually be
practised on the ground. In the third section we argue that domestic workers’
struggles can be used to interrogate the role that feminist and women’s rights
activists play in the fight for the rights of multiply marginalized women.
In the fourth and final section we introduce our multi-layered approach
to analysing the transformations in domestic workers’ rights, an approach
which looks at the sector itself, at domestic workers’ rights organizations,
at the ‘field of action’ mobilizing for domestic workers’ rights and at the
‘interpretative frames’ used by the actors in this field. The chapter ends by
providing details about our methodology and summarizing the contents of
the book.
DomESTIC workers’ rights go global

In 2017, DomEQUAL organized two meetings at Ca’ Foscari University of Venice, bringing together leaders of the global domestic workers’ rights movement, including representatives of the International Domestic Workers Federation (IDWF). They were joined by academics from the Research Network for Domestic Workers’ Rights. Following the meetings, we became aware of the urgency of finding ways to compare contexts that were profoundly different, yet which were all, in their own ways, engaged in processes of change towards similar end goals. In other words, examining how a global right can be realized at the local level.

This change began with what we have called the ‘C189 process’ and the promulgation of ILO C189 in 2011. The Convention, counting 31 ratifications as of January 2021, has continued to represent a motor for change globally in the years since its enactment. It is important to note that the ILO process itself only came about as a result of the activism of domestic workers and their allies. Indeed, in some contexts, organizing for domestic workers’ rights preceded the Convention and was not the result of initiatives of the ILO or other international actors based in or associated with the Global North, including European Union (EU) institutions (such as the one financing our project). Clearly, a number of domestic workers’ movements that emerged in the Global South had a lot to teach organizations based in other parts of the world in terms of organizing, alliance making, radical critiques of reproduction, inequalities and the care crisis, among other things. The networks promoting domestic workers’ rights were particularly active in Asia and Latin America, and less so in Europe, while the Convention itself had been ratified in many countries of the Global South, where it has become an important tool for activists demanding greater rights. However, it has been received and used in diverse ways, which require some elaboration.

In 2008, the ILO decided to put what later became C189 on the agenda of their next assemblies, immediately prefiguring the possibility of a revolutionary shift. For many, it was incredible to think of a convention for a sector which traditionally suffered from an immense lack of rights, and for a form of work which in most countries was not even recognized as such. Where it was recognized, it was given second-class status for not being considered ‘real work’. Given this scenario, having gathered the opinions of experts and activists, the ILO suggested that domestic workers should be treated as other workers in their respective countries. Equality was conceived in terms of salary, but also in terms of protection in the workplace. The ILO also demanded that the expansion of labour rights had to be accompanied by the creation of new forms of association and, where possible, trade unions formed by domestic workers themselves. Finally, these
legal and socio-political transformations could not happen without a cultural change at the level of the social representation of these workers, with a view to countering the stigma attached to them. In so doing, the Convention combined the fight for the specific cause of domestic workers’ labour rights with a wider struggle for the human rights of particularly vulnerable subjects, from undocumented migrants to low-caste and racialized women. C189 incorporates an intersectional approach, appealing simultaneously to issues of gender, race, ethnicity, religious and class-based discrimination at work, and advocating for the protection of the most vulnerable categories of domestic workers, with special reference to migrant workers (Schwenken, 2013; Fish, 2017). It is indeed this capacity of C189 to include previously invisible subjects which epitomizes what Clifford Bob (2011) refers to as a ‘new right’, meaning ‘new’ international human rights ascribed to groups traditionally neglected by society, as in the case of disabled people internationally or Dalit people in India.

Correspondingly, in the years 2008–18, the case of paid domestic workers gradually emerged as a matter of political debate involving a growing number of international actors, attracted by the emergence of domestic workers’ rights as an increasingly pressing policy issue at the global level. Actors who had already been involved found new legitimation. As a result, we see a large range of actors in the field, from political parties, trade unions and grassroots workers’ groups to humanitarian NGOs, religious organizations and international organizations for workers’ rights, such as the International Trade Union Confederation (ITUC) and the global network Women in Informal Employment: Globalizing and Organizing (WIEGO). International bodies such as the ILO, UN-Women, the Commission on the Status of Women, and the European Parliament have also taken a stand (Fish, 2017). Finally, the founding of the IDWF in Montevideo in 2013 (previously the International Domestic Workers Network, IDWN) is evidence of the global expansion of the movement.

Against this backdrop, we set out to explore the impact of C189 as an instrument for the governance of global rights in a back-and-forth relationship between the national and transnational level. An expanding literature on the Convention has begun to address this issue in recent times. Indeed, scholars have seen the mobilization around C189 as a pivotal moment in the scaling-up of local and national movements and the formation of the IDWF as transnational collective actor. For instance, they have described the key role played by the IDWN and by some regional and national organizations in the drafting of the Convention in Geneva in 2011 (Schwenken, 2016; Fish, 2017; Acciari, 2019). Louisa Acciari (2019) suggests that this process constitutes a paradigmatic example of the ability of ‘subaltern groups’ from the Global South to generalize their demands and produce new rights. Other
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Scholars have focused on the legal advancements brought about by signing the Convention into national law (Albin and Mantouvalou, 2012), while others still have looked at the impact of C189 on national or regional social movements and on the political processes related to the campaigns for its ratification and consequent implementation (Schwenken, 2013; Blofield and Jokela, 2018).

A comparative study of the transformations in the working conditions of domestic labourers in the nine countries which are the object of this research constitutes a strong vantage point from which to observe the different dynamics engendered by the C189 process. Each represents distinct positioning within the process of globalization, with differing socio-cultural contexts, mobilizations for domestic workers’ rights and levels of involvement in the C189 process. All the countries we selected for the present study have been impacted by processes of change in the field of domestic work in the last decade, and in all of them activists and lawmakers have proposed bills to better the conditions of domestic workers, albeit with different outcomes. We included countries that have been involved in the C189 process, and countries where this process was marginal or even absent. Indeed, in the context of Europe, we included two countries which have ratified C189 – Italy and Germany – and Spain, which has not. In Latin America, we included two countries which have ratified it and Brazil, which hadn’t at the time of our investigation. As for Asia, we included the Philippines, the only country in Asia which has ratified C189, India, which has not, and Taiwan, which is exceptional in that it cannot ratify C189, since it is not a member of the United Nations (UN).

These countries also represent a combination of areas differently positioned in the processes of globalization across the Global North–South divide, and where various social inequalities are played out in the domestic work sector. Crucially, the nine countries are clustered in three geographical areas – Latin America, Asia and Europe – rather than from more dispersed locations, so as to allow not only global, but also intra-regional comparisons. For instance, international migration and segmentation by national origin strongly marks the sector in the three European countries, as well as Taiwan. Internal migration from rural and impoverished areas to major cities shapes domestic work in many of the countries of the Global South included in the study, such as India, Brazil and Colombia, while the combination of internal mobility and emigration of workers characterizes Ecuador and the Philippines.

Intersectionality in action

Self-organized groups of domestic workers, that is, trade unions, associations and networks composed of and led by women employed in the sector, have
emerged as prominent in the politicization of domestic workers and in the struggle for their rights across all the countries studied. Interestingly, domestic workers’ organizing represents a form of collective action developed by workers who, being subjected to both economic and symbolic exclusion, fight simultaneously for labour rights, human dignity and social recognition. Domestic workers are typically multiply marginalized – be that on the basis of gender, class, caste, nationality, race, ethnicity or rural background. As a result, the organizations involve and seek to represent these social groups, in addition to domestic workers per se. For all of these reasons, as we have said, domestic workers’ mobilizations challenge the boundaries between labour movements, feminist struggles and what is sometimes referred to as identity-based activism (Fish, 2017). Namely, they may provide opportunities for encounter and convergence between struggles for labour rights and class equity, women’s rights and gender equality, the right to care for dependent and disabled people, cultural recognition for ethnic and racialized minorities, and anti-racism and migrants’ rights.

This coming together may make room for solidarity, coalitions and alliances across different social movements and political projects. At the same time, the regulation of domestic work is a contentious issue, revealing conflicting interests and power asymmetries among and within social movements that can affect the relationship between domestic workers’ rights groups and other actors in the field. For all these reasons, we believe that domestic workers’ movements put ‘intersectionality in action’ and may be fruitfully analysed through an intersectional approach.

Originating in Black, postcolonial, lesbian feminisms and critical race theory, intersectional analyses reveal the interplay of several axes of social division (such as race, gender, class, age, sexuality, ability, religion, origin, nationality and so on) in shaping people’s lives and identities, social inequalities and the organization of power in society (Marchetti, 2013; Hancock, 2016; Romero, 2017; Collins and Bilge, 2020). As such, since the second half of the 1990s the idea of intersectionality has been taken up as a critical tool to explore a vast array of political projects and social movements (Cho et al, 2013: 800–4).

In our view, the ways in which authors in this expanding field of study have addressed these questions may be divided into two categories. A first research direction focuses on the difficulties that many social movements and organizations face when dealing with complex inequalities, trying to address issues such as multiple marginalization and power imbalances among their members. Studies cast light on the disempowering and exclusionary outcomes of movements that seek equality along a single dimension (for example, only gender, or only class, or only ethnicity) and fail to tackle the intersection between specific categories of identity and related forms
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of oppression (Crenshaw, 1991; Ferree and Roth, 1998; Strolovitch, 2007). A second set of studies focuses on the uses of intersectionality as ‘a social movement strategy’ (Chun et al, 2013; Evans, 2016). These studies concentrate on cases in which an intersectional approach to complex inequalities is involved in processes of empowerment and organizing from the margins, leading to the formation of new political subjectivities, groups or coalitions through which multiply marginalized subjects can make their voices heard. Taken together, these two streams suggest that intersectionality is increasingly seen as an inspiring idea and political praxis for social struggles beyond feminist and anti-racist movements.

Some authors suggest that the mapping of the various uses, forms of resistance and outcomes of intersectionality on the ground is a useful task that deserves further analysis (Bassel and Lépinard, 2014; Woehrle, 2014; Irvine et al, 2019; Evans and Lépinard, 2020a). Different proposals have been advanced for how this could be done. In-depth studies on women’s and other social movements have investigated the use of an intersectional framework in relation to different aspects of a social movement, such as the construction of collective identity (Roth, 2004; Carastathis, 2013; Cherubini, 2018), the framing processes and cultural repertoires that a movement adopts (Cruells López and Ruiz García, 2014; Lépinard, 2014; Okechukwu, 2014) and, finally, the conflicts, coalitions and alliances it may spark (Cole, 2008; Townsend-Bell, 2011; Predelli et al, 2012; Verloo, 2013). More broadly, Patricia Hill Collins and Sirma Bilge (2020) conceive of intersectionality as a critical praxis reflected in a vast array of social justice movements, guiding activists and practitioners in dealing with social problems that come with complex social inequalities. Ange-Marie Hancock (2011) identifies intersectionality as a justice-oriented framework for exercising solidarity and building political coalitions across differences, which may be embraced by collective actors in order to overcome what she calls the ‘Oppression Olympics’, that is, a detrimental competition among oppressed groups. Lastly, Elizabeth Evans and Éléonore Lépinard (2020b) argue that intersectionality can be practised in feminist and queer movements as a collective identity involved in the construction of multiple-axis organizations, as a strategy to build coalitions across differences and movements or, finally, as a repertoire for ensuring the inclusion of women and subjects from minority groups into existing organizations.

Drawing on these contributions, in this book we wish to embrace the question of how social movements make intersectionality on the ground, by applying it to the case of domestic workers’ movements. Our analysis focuses on settings and types of movements that have rarely been researched in the literature on intersectionality discussed earlier. Indeed, when we look at the empirical cases investigated in this literature we can see that – with a few
exceptions (such as Coll, 2010; Alberti et al, 2013; Bernardino-Costa, 2014; Cherubini and Tudela-Vázquez, 2016; Agarwala and Chun, 2019a; Tilly et al, 2019) – the studies largely concentrate on feminist movements, while very little attention is given to movements that may not define themselves as feminist (Molyneux, 2001). Such movements include women workers’ movements (Cobble, 2005) and, in particular, movements for an informal, precarious and mostly female workforce, such as domestic workers. Further, we have also observed that most studies have taken place in contexts of the Global North and have been focused at the national level, although the recent expansion of the field is rapidly changing this picture. In contrast, in this book we focus on the women’s labour movement, and we use a large-scale comparative analysis which includes both Global Northern and Southern contexts.

Some relevant methodological issues arise when engaging with the narratives of these movements in a comparative way. Firstly, we draw on notions of the ‘translocality’ and ‘transtemporality’ of social divisions, as developed by Nira Yuval-Davis (2015) and Floya Anthias (2012), to look at the way social categories can have different meanings and imply different power relations in different national contexts and historical periods. Secondly, we pay attention to issues of language. As scholars and activists we – the authors – contribute to academic and political spaces in which ‘intersectionality’ is a widespread and highly debated word. However, many of the groups we met through the project, including domestic worker activists, tend to use different language and do not always use the terms ‘intersectionality’ and ‘intersectional’ to refer to the phenomenon of overlapping experiences of gender, class, race, migration and so on that they personally live through. We may say that they use intersectionality as a ‘form of critical praxis’ without necessarily using the term (Collins, 2015), and that they develop an ‘intersectional consciousness’ and ‘intersectional-like thinking’ (Hancock, 2016). In short, according to our interpretation, these workers ‘make intersectionality’, although often under other names, as the analysis throughout the book will show.

**Feminism and domestic workers’ struggles**

Feminist perspectives have greatly contributed both to our activism as feminists growing up in Italy and to our academic training in the social sciences in different western European countries in the 2000s. Building on this knowledge and experience, we have made sense of domestic workers’ demands for equal rights as aligned with feminist claims for the general improvement of women’s conditions around the world and as a paradigmatic case for the valorization of reproductive labour, which has been advocated
in feminist debates (Federici, 1975; Picchio, 1992; Folbre, 2001). The same approach to domestic work as ‘a feminist issue’ was shared by many of the feminist scholars, policy makers and activists whom we encountered during the research, including interviewees for the project fieldwork (see section on ‘Methodology’).

However, when domestic work becomes a paid activity, troubles arise within feminist debates and this touches on power differentials and hierarchies existing between women. We also noticed that feminist organizations only rarely engaged directly in struggles for domestic workers’ rights, and the conceptual linkages that we see do not automatically correspond to the formation of alliances between the two movements. Moreover, domestic workers’ groups are often reluctant to define themselves as feminist, in a similar vein to other women activists who mobilize in support of workers’ rights or against social marginalization. In fact, the perception of being at a distance from the feminist movement is a recurrent topic in the accounts of domestic workers’ activists across different national contexts and time periods. This is at least partly connected to the fact that in a number of contexts feminists delegate care and domestic tasks, and they therefore become employers of domestic workers. This is especially true in contexts in which there is little public provision of care and these tasks remain mainly women’s responsibility. This scenario is likely to give rise to a conflict of interests, and even to affect political interventions by feminists in the field of domestic workers’ rights (Tronto, 2002; Pitch, 2004; May, 2011).

The complicated relationship between domestic workers’ rights activism and feminist movements merited further study. We began by examining the conditions that made it possible to have feminist organizations allied with struggles for domestic workers’ rights in certain countries and not in others. As will become apparent, to understand this diversity one must take into account the different feminist traditions, the other actors involved in domestic workers’ rights and also, importantly, the interpretative frames that have been mobilized in each context to promote them, which will be discussed in the following chapters.

In this book we argue that despite the fact that in many contexts there has been a disconnection between the two movements at the practical level, they nevertheless share a great deal in their common critique of contemporary capitalist societies and the exploitation of women, migrants and domestic workers within them. Domestic workers’ rights activists often seem to build their arguments on the same anti-capitalist interpretative frames used by feminist groups, yet they expand them through an intersectional analysis so as to include racialized, lower-class, migrant and other minority groups in ways which few feminist movements have accomplished. This capacity to rework existing frameworks becomes a creative force at the level of discourse,
where different alliances may take place, and indeed it has been argued that it can contribute to the revitalization of contemporary feminisms (Federici, 2016). In order to understand our argument about this discursive convergence and creativity, it important that we begin by highlighting the main elements of those feminist approaches which provide an interpretation of domestic workers’ labour conditions and social positioning.

Reproductive labour

The first feminist debate that is relevant to domestic workers’ rights is the one on reproductive labour. This debate goes back to the 1960s, when feminist scholars in numerous countries concentrated their attention on what they called reproductive labour, with the aim of shedding light on the specificity of women’s oppression within the political economy of capitalist societies. The notion of reproductive labour refers to the material and relational work necessary for the creation and recreation of the workforce through time. Such work includes all activities aimed at the well-being and survival of societies and, in particular, tasks relating to nurturing, tending to and assisting children and the sick, as well as to carrying out chores such as cleaning, cooking and washing, which benefit all members of the household. This reproductive labour has historically been a normative obligation for women, as opposed to the assignment of productive labour to men, that is, work for the production of material goods. This dichotomy has been reinforced by moral, religious and pseudo-scientific views that emphasize women’s ostensibly natural aptitudes and skills in this realm, considered inferior to men’s sphere of activity. Challenging these assumptions, feminists have long argued for the valorization of reproductive labour within capitalist economies in the same manner as productive work (Larguía and Dumoulin, 1976; Pateman, 1988; Picchio, 1992). Many women around the world have launched campaigns emphasizing the need to recognize the value of these activities, not only in terms of their social value but in terms of the economic contribution that they bring to society (Sarti et al, 2018). This has led, for instance, to the International Wages for Housework Campaign. The campaign is inspired by, among others, Silvia Federici, Mariarosa Dalla Costa and Selma James and has influenced dozens of groups of women in Italy and the United States (US) (Dalla Costa and James, 1975; Federici, 1975; Dalla Costa, 2008, Toupin, 2014; Gissi, 2018b).

Care economy and migration

Over the years, a strand of the feminist movement has preferred to use the term ‘care’ rather than ‘reproductive labour’. In fact, the notion of
care draws more links between labour done inside and outside the home, and more attention to the aspects of the work which are perceived to be ‘emotional’ (Palmer, 1989; Roberts, 1997; Zelizer, 2009), as well as to the needs of children, the ageing and the ill (Mahon and Robinson, 2011; Williams, 2011).

The questions of ‘care’ have been made particularly relevant by the crisis of welfare states and the intensification of different forms of commodification of reproductive labour, which became visible in most industrialized countries at the beginning of the 1990s. During this time, with the beginning of a crisis in state welfare systems, the refamiliarization of care provision, which was previously taken up by the state, provoked the expansion of a market of home-based care work. This has fostered the spread of a conception of care as a commodity and has made feminist economists speak of a ‘care economy’: a specific form of economy which differs substantially from others, given the intimate and personalized character of the service provided (Folbre, 2001; Zelizer, 2009).

Although the states that had previously engaged in direct care provision have mostly withdrawn from it, they maintain other functions which greatly influence the sector. Firstly, states have an important regulatory function over these markets, since they provide the normative framework and the regulations that allow private companies or individuals to offer their services inside households (Boris and Klein, 2012). Secondly, states play a key role in dictating the rules and conditions regarding the recruitment of migrant workers, which is of paramount importance today, given the high percentage of international migrants employed in all forms of care provision in many parts of the world. The composition of each labour force has a different character, depending on existing bilateral agreements with workers’ countries of origin, including pre-departure training programmes and quota-based policies (Kofman and Raghuram, 2015).

This brings us to the social stratification between workers in the sector, which establishes hierarchies between migrants along nationality, class and gender lines, contributing to their differential inclusion in the labour market. Migrant women are disadvantaged by policies privileging skilled migration as well as by legislation denying work permits to those who have migrated to reunite with their families. The ways in which these racialized and gendered representations inform the organization of domestic and care labour have attracted the scholarly attention of those investigating the idea of a ‘cultural’ predisposition for caring among women (and men) of certain nationalities (Lan, 2006; Marchetti, 2014; Gallo and Scrinzi, 2016). This stratification perpetuates the devaluation of these jobs, as far as these are considered ‘naturally’ assigned to the most vulnerable and stigmatized subjects in each context (Gutiérrez-Rodríguez, 2010).
Challenging sisterhood

Finally, feminist scholars have also discussed the unequal distribution of reproductive labour between women, since this is often delegated by middle-class, racially privileged women to those from working-class and racialized groups (Nakano Glenn, 1992). It is particularly important to consider these differences when domestic workers are migrants in industrialized countries. Rhacel Parreñas (2001) introduced the concept of the ‘international division of reproductive labour’ to expand the view from a ‘racial’ division (Nakano Glenn, 1992) to the global level. On this view, globalization is the scenario within which reproductive work is divided and passed on, from one woman to another – less-privileged – woman. Building on this, Arlie Russell Hochschild (2002) later developed the notion of ‘global care chains’ to draw attention to the ‘care drain’ from the Global South to the Global North, with the improved family life of employers occurring at the price of workers’ own family lives (Yeates, 2004; Pratt, 2012).

In some countries, the differences between women as employers and employees are strongly inflected by the legacies of slavery and of colonial domination (Marchetti, 2014; Ribeiro Corossacz, 2018; Masi de Casanova, 2019). In parts of the Global South, such legacies have remained alive even after independence and the end of slavery, with the continued existence of indentured labour and servitude. The corresponding racialization of social differences is still evident in contemporary societies, for example in the disparity between different areas of the country and in social stratifications in urban settings. Such differences are of the utmost importance in the relationship between employer and employee, for example when the former belongs to the racially privileged urban middle class and the latter is a racialized woman from a rural background living on the outskirts of a major city, or when women of indigenous heritage work for households belonging to the racially privileged group. Colonial legacies likewise play a major, albeit different, role in the relationship between migrant domestic workers and their employers in the Global North. Here the process of racialization and stereotyping of employees by their employers is rooted in a cultural imagery deriving from the colonial past, and often from the colonial history’s erasure from collective memory. This tends to be reinforced by differences in immigration and citizenship status between the employers and the employees, related to the restrictive migration policies present in the Global North.

The inequality affecting the employer–employee dyad therefore challenges notions of ‘sisterhood’ between women. Assumptions about a mutual understanding based on ‘common’ gender roles are counterbalanced
by class-based hierarchies that simultaneously intertwine with differences based on age, religion, race or ethnicity (Momsen, 1999; Yeoh and Huang, 1999; Haskins, 2001). Women in this dyad have very different social positions and this asymmetry leads to a wide spectrum of phenomena, from abuse, to benevolent, maternalistic support. Through the latter, employers unwittingly exercise their power over subjects who are dependent on them for their legal status and for making a living (Marchetti, 2016a; Barua et al, 2017).

**A multi-layered approach to domestic workers’ rights**

Throughout the DomEQUAL project and the writing of this book, our main research question has been to understand how advancement is made, or not made, in the field of domestic workers’ rights. Drawing upon the tools and contributions of social movement, intersectional and feminist scholarship as discussed earlier, we came to study these changes through a multi-layered approach which focuses on the various objects and levels of analysis where change may take place. In choosing this approach we were inspired by the input of activists who, in their narratives, intertwine definitions about domestic workers’ identities and considerations about the policing of the sector, as well as discussions on how to organize for the advancement of domestic workers’ rights. Yet they often also stress the importance of the relationships between domestic workers’ rights organizations and other organizations, institutions and movements. Further, activists also concern themselves with questions regarding the representation of domestic workers in the public sphere and how their organizations can shape this for the better. Therefore, we selected four objects and levels of analysis, which are not to be taken as exhaustive, or as representing a hierarchical or nesting relationship (Walby, 2007). They are the following:

1. **The labour sector**: we investigate the main features of the domestic work sector, the legal provisions regulating workers’ rights and the labour conditions of domestic workers.

2. **Domestic workers’ rights organizations**: we focus on the collective organizing of domestic workers as a social movement. We look at how the collective identity of ‘domestic worker’ is created through the organizing process, how it acquires political relevance in the eyes of the workers and how it is reflected in the claims, goals and activities of the domestic workers’ organizations active in the field.

3. **The domestic workers’ rights field of action**: we come to see domestic workers’ groups as embedded within a larger field of action, and we analyse the whole field, made up of actors that variously engage with
the struggle as supporters but also as opponents. This is due partly to the nature of the struggles for domestic workers’ rights, which tend to go beyond the bounds of traditional forms of organizing. In so doing, we make use of strategic action field theory, developed by Neil Fligstein and Doug McAdam (Fligstein, 2008; Fligstein and McAdam, 2012) to describe a meso-level dimension in which individual and collective actors interact with each other through a shared purpose. The authors make use of Bourdieu’s idea of social fields to provide a means of interpreting the behaviour of collective actors, their reciprocal moves, how they frame their actions, goals and results and how actors ‘strategically’ (although not always consciously) decide to engage in a specific field in order to achieve certain results.

4. The frames used in the field: we explore the discursive frames that these actors mobilize in this process. Interpretative frames (Benford and Snow, 2000; Johnston and Noakes, 2005) prove to be decisive in shaping these concerns and the corresponding strategic field of action. Specific frames provide actors with tools to understand their problems and identify possible solutions, build consensus and take action. Different formulations of such narratives or emphasis on certain topics may (or may not) pave the way to alliances between groups.

Methodology

In order to address the four levels of analysis illustrated earlier, we developed a quali–quanti methodology, combining, for each country, in-depth interviews with key informants, policy documents, materials written by domestic workers’ organizations and other relevant actors, short periods of participant observation, as well as relevant statistical data.

The multi-local fieldwork and the simultaneous collection of data in the nine countries were possible thanks to the work of the country experts, that is, local researchers with previous expertise in the field, coordinated by the Principal Investigator, Sabrina Marchetti, and the senior researchers in Venice. For Latin America, the country experts were Thays Almeida Monticelli in Brazil, María Gabriela Alvarado Pérez in Ecuador and María Fernanda Cepeda Anaya in Colombia (coordinated by Daniela Cherubini); for Europe they were Beatrice Busi in Italy, Silvina Monteros Obelar in Spain and Marlene Seiffarth in Germany (coordinated by Anna Di Bartolomeo); and for Asia they were Madhurima Das in India, Verna Dinah Q. Viajar in the Philippines and Pei-Chieh Hsu in Taiwan (coordinated by Giulia Garofalo Geymonat).

The qualitative in-depth interviews were conducted with key informants, such as activists, organizers, policy makers, legal professionals and experts,
between April 2017 and March 2018 by the nine country experts. There were 195 in total (with 200 key informants), of whom 24 were in Brazil, 24 in Colombia, 22 in Ecuador, 22 in Spain, 21 in Germany, 20 in Italy, 19 in the Philippines, 20 in India and 23 in Taiwan. The interviewees were selected after mapping the relevant actors in the field, in collaboration with the country experts – and through a continuous back-and-forth between us and them. Most of the informants were protagonists and/or specialists in the field of care and domestic work, but we also included actors from other fields which, depending on the country, were relevant to the struggle for domestic workers’ rights, such as activists for labour, feminist, anti-racist, ethnic minority and disability rights, sex workers’ rights, and media practitioners. A minority of the interviewees (22 activists and domestic workers’ leaders and one politician) also had former or present experience of working as a domestic worker.

The interview strategy was developed through a pilot of 27 interviews, which allowed us to cluster our participants into three types of key informants, namely (i) academics, (ii) activists and policy makers and (iii) legal experts – even though we were aware that these categories overlap to some extent. Out of the 200 interviewees (of whom 163 identified as women and 37 as men), 70 were academic experts (of whom 61 identified as women and 9 as men), 97 were activists and policy makers (of whom 78 identified as women and 19 as men) and 33 were legal experts (of whom 24 identified as women and 9 as men). Each of these three groups was approached with a different interview guideline to explore their views regarding the condition of domestic workers in their country, and their own involvement in the strategic field of action and knowledge production in respect of domestic workers’ rights. We also formulated, in collaboration with country experts, ad hoc questions for activists working in the fields of women’s rights, migrants’ rights and the media.

The analysis of the interview material was supported by the appraisal of policy documents, texts produced by paid domestic workers’ organizations and other relevant actors, and by ongoing dialogue with the country expert for the duration of the project. Further, our interpretation of each country case was supported by the participant observation that we carried out and the conversations that we had with interviewees during our visits to each country, as well as by the information gathered through the workshops with local actors, which we held from late 2017 to early 2018. The project also collected statistical data describing the main demographic trends of each country, including international migration flows. It looked at the main features of the domestic work sector in terms of the size and composition of the workforce and the make-up of the employers, as well as in terms of the country’s working conditions and levels of formalization. Here the work
of Anna Di Bartolomeo, who worked as senior researcher during the first two years of the project, was pivotal.

The participants had the opportunity to choose various levels of anonymity, and a small minority preferred to have their name (and/or the name of their organization) protected, while the great majority chose to make them public. The interviews were conducted in many languages: Italian, English, Spanish and Portuguese, which we were able to read in the original, but also German, Mandarin, Tagalog and Hindi, which the country experts translated into English. For the analysis of such a large body of text, we used MAXQDA, creating a system of 135 codes divided into 11 clusters, which supported our analysis, in terms both of content and of discourse concerning labour issues, laws and social policies, collective actions, the relationship between actors and so on. The organization and coding of this empirical material was carried out with the contribution of two research assistants based in Venice, Vincenza Perilli and Beatrice Gusmano.

It is worth pointing out that the analysis of the interviews that we provide in this book should be taken as our interpretation of the interviewees’ reflexive accounts on collective activities, identity making and processes of social and legal change that they have, to varying degrees, participated in. These subjective accounts were produced by activists and organizations under different circumstances and through different interactions (such as interviews, DomEQUAL workshops, public events and documents). In the case of individual activists, they do not fully represent or capture the entire orientation and action of their groups. The picture we can present as researchers working with interpretations of interpretations (Geertz, 1973), within a qualitative approach, is always partial and situated. Moreover, in our case, the interviews were conducted by country experts, who also informed the interview material with insider knowledge, at least partly following their own activist and research agendas.

We selected the country experts independently, rather than in partnership with an academic or other institution. At the time, they were independent researchers or postgraduate students, and many of them were involved in activism in the field of women’s or migrants’ rights, trade unionism and human rights more generally. Some of the country experts have already produced their own publications based on their fieldwork with DomEQUAL (see Monticelli and Seiffarth, 2017; Monteros Obelar, 2019; Busi, 2020).

The country experts not only conducted the fieldwork to gather in-depth interviews, but also facilitated our general understanding of the legal, economic and socio-political background of each case. In particular, they were asked to prepare material concerning the general socio-economic and political profile of the country, with a specific focus on the domestic work
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sector and other relevant fields (for example, migrants’ and women’s rights); a timeline of the major events that influenced the domestic work sector; and, finally, (at the end of the fieldwork) a self-reflective interview retrospectively commenting on their research experience and on the DomEQUAL research design and approach.

Lastly, the role of country experts was particularly visible during our visits to their countries, during which they provided us with the opportunity to see some of the places where domestic workers gather, to meet a number of the organizations and interviewees and to join them in public events such as demonstrations, parliamentary hearings and public assemblies. In the case of the Philippines, our travel was facilitated by the presence of Charito Basa, a Filipina migrant activist and community researcher based in Italy. Furthermore, the country experts co-organized the local workshops which brought together many of the interviewees.

The trips were unique moments of insight for the authors travelling from Italy. Firstly, we were better able to understand the ways in which the debate on domestic work is constructed differently in each national context. Secondly, we were able to gain a greater understanding of the relationships existing between the actors involved in the research and the country experts working for DomEQUAL. Finally, and this was crucial, the visits helped us to better see the position we occupied as researchers.

Indeed, positionality has emerged as an important issue throughout the research process, with respect to a complex web of negotiations and power-loaded relationships. Certainly, the entire research process has been deeply influenced by our position as White women academics from a university located in southern Europe, working in a well-funded EU research project. Furthermore, the position that the country experts themselves occupied vis-à-vis the participants and the domestic workers’ movements has been very important. Writing this book has been nourished by the recognition of the pitfalls and potentialities of our specific (personal and research) standpoints. Indeed, becoming aware of these positionings and of the power relationships they imply is a fundamental yet inevitably ongoing process in feminist research (Haraway, 1988; Alcoff, 1991; Naples, 2003). In the following, we share some of our reflections and strategies regarding these matters.

Each of the country experts brought to the research their own background, resources and strategies to simultaneously negotiate their collaboration with us, as their research supervisors based in Italy, and their relationships with participants. The latter had to include not only grassroots activists, but also policy makers and experts. The country experts shared some characteristics as women, as junior academics and, in most cases, as nationals of the countries...
they studied. Yet, they had different positionings in relation to other important aspects, including those concerning class, sexuality, ethnicity and level of personal engagement in social movements. Each of the nine country experts worked for the project in a relationship of constant communication and supervision with us, while simultaneously, at least partly, following their own research and activist research agendas. Some of them started to volunteer for domestic workers’ organizations, others activated their networks in labour or feminist movements or made beneficial use of their previous work experience at a variety of institutions, including universities and the ILO. This has in turn influenced both the relationship with us and the production of different qualitative materials, with some being more activist oriented, others more focused on policy reforms, some more intimate, others more formal and so on. These differences were also apparent in the self-reflective document that they submitted at the end of their collaboration.

The position of the three of us as authors and coordinators of this research certainly needs to be read as one of privilege vis-à-vis the country experts, the research participants and, crucially, domestic workers’ movements (Federici, 2009; Chesters, 2012; Lasalle, 2020). Outside Europe in particular, we experienced reciprocal expectations and stereotypes, accompanied by the risks of knowledge exploitation from our side in relation to the country experts, the local scholars and the activists. We have tried to respond to this complex situation in a variety of ways. This includes eliciting the country experts’ and our own reflections, during supervisions, informal conversations and in the self-reflective document mentioned earlier. Furthermore, we sought to address the issue through the inclusion of local academics in the advisory board of the project and the mobilization of the Research Network for Domestic Workers’ Rights, of which Sabrina has long been a part. As for the relationship with activists, this was particularly important in the early and later phases of the project. In 2017 we were able to invite a group of leaders of the domestic workers’ rights movement from various countries to Venice, as explained at the beginning of this chapter. Together with Beyond Trafficking and Slavery–Open Democracy, we developed the documentary film entitled Domestic Workers Speak and published the open access volume Domestic Workers Speak: A Global Fight for Rights and Recognition (Garofalo Geymonat et al, 2017), both collecting the voices of the domestic workers’ organizers around the world. In autumn 2021 we launched the web documentary series called Domestic Workers’ Rights: Intersectionality in Action. The development of these projects of knowledge dissemination has been essential to the research process as a whole, not least because it helped us partially to redefine our relationship with some of the activists and participants in a more collaborative way.
Structure of the book

Following this introduction, our book is divided into four chapters, each of them reflecting our attention to the different levels of analysis presented earlier. These are: the main features of the domestic work sector, its legal provisions and workers’ rights (Chapter 2), transformations in the strategic field of action of domestic workers’ rights (Chapter 3), the collective identity and activities of domestic workers’ organizations (Chapter 4) and the frames used to promote domestic workers’ rights, with special attention to feminist approaches to reproductive labour and the commodification of care (Chapter 5).

Chapter 2 in particular aims to give a background to the different pathways through which domestic workers’ rights emerged as a political terrain in the nine national contexts, over a period of time that precedes and includes the decade 2008–18. For each country, we focus on the changes and turning points that this sector has gone through in recent decades. We look at the size of the sector, its relevance and composition and the profiles and conditions of workers and (where possible) employers. Importantly, we connect such transformations to the demographic, socioeconomic, cultural and political changes that mark each country. In each case, we also trace the (albeit partial) history of domestic workers’ rights, focusing on both the regulation of rights through legal reforms and policy interventions and the struggle for rights through collective organizing and mobilization in the field.

Building on this background, Chapter 3 discusses the role of C189 and, in particular, the ways that C189 as a tool of global governance of domestic workers’ rights was incorporated, promoted or resisted in each country. We interrogate the ways in which what we identify as a global right can be applied to the level of local struggles. In particular, we offer an analysis of the dynamics created by the C189 process in each of the nine countries under study, by using a strategic action field perspective. We describe how, in each country, the main elements characterizing the strategic field of action – namely the actors, their goals and their relationships – have evolved over the period 2008–18. We also introduce the interpretative frames that have animated the field in giving meaning to the issue of domestic workers’ rights in each country. In this analysis, we suggest that the C189 process was what Fligstein and McAdam (2012) call an ‘external shock’ which affected each country, yet prompted different dynamics depending on contextual factors. Building on this discussion, we elaborate a comparative assessment of what has happened in the nine countries in relation to the C189 process. We describe how it has been incorporated, challenged, modified or even opposed, depending on comparable local factors that relate to the
socioeconomic, cultural and political context in which the C189 process took place at the national level.

Chapter 4 switches the focus of analysis by looking at domestic workers’ groups, associations and trade unions. Among those we encountered in our fieldwork, we focus on organizations that were particularly active in the years 2008–18. We engage with the question of the ‘making of intersectionality’ on the ground, exploring the possible use of intersectionality as a social movement strategy. Keeping this question at the centre of our inquiry, we look at the way domestic workers make sense of their specific experience of marginalization and, on that basis, how they build a collective identity as organized workers and how they develop their actions and articulate their political demands.

The question of intersectionality returns in Chapter 5, which addresses the complicated relationship between the domestic workers’ and the feminist and women’s rights movements. In Chapter 5 we try to make sense of the different positions that the latter groups took in the strategic field of action of domestic workers’ rights across our nine countries in the years 2008–18. In our view, it is important to take into consideration the possible connection that may exist at the discursive level between these movements. Indeed, our interview material indicates that, in several instances, actors in the field of domestic workers’ rights draw upon prominent feminist discourses in framing their struggles for domestic workers. Notable among these are those related to reproductive labour and the commodification of care. Yet, when doing so, these actors crucially negotiate and elaborate on such feminist discourses, typically complicating the exclusively gender-based analysis that some feminist tendencies promote.