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RESEARCH ARTICLE

GLOBAL RIGHTS AND LOCAL STRUGGLES

The case of the ILO Convention N.189 on Domestic Work

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ABSTRACT: In response to the promulgation of International Labour Organisation (ILO) Convention n.189 on domestic workers in 2011, scholars have turned their attention to this workforce, documenting how the Convention acted as a catalyst for the proliferation of campaigns at national, regional and international levels. The ILO Convention is an attempt to address domestic workers' labor rights as "global rights" and as a global common goal due to their implications at the level of human and social rights for a wide range of vulnerable subjects in many countries. However, little is known about the ways in which the Convention has been incorporated - or resisted - with respect to "local struggles" and in different local contexts. Our study contributes to filling this gap by offering a comparative analysis of four countries - Colombia, Italy, the Philippines and Taiwan - between 2011 and 2018. Considering Convention n. 189 as an exogenous factor, we explore the configurations of the strategic action field (Fligstein and McAdam 2012) of domestic workers' rights in these countries - including the actors involved, the focus of their action, the alliances they establish, and the frames they activate. Our analysis shows that Convention n. 189 seems to have fostered transformations in terms of mobilization and the enlargement of rights in contexts where it has promoted synergy between state and civil society actors, has been embedded in pre-existing local struggles and in larger progressive political projects, and has been framed in ways that touch on issues of national identity.

KEYWORDS: ILO Convention n.189, Colombia, Italy, Philippines, Social Movements, Taiwan

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1. Introduction¹

Recent decades have seen increasing concern over domestic workers' labor rights, and interest in the subject has grown among academics, politicians, human rights and labor experts. In fact, though more so in some countries than others, the case of paid domestic workers has gradually emerged as a matter of political debate and new actors have become involved. Examples of these actors range from political parties, trade unions and workers' grassroots groups, to humanitarian NGOs, religious organizations, and international organizations for workers' rights such as the International Trade Union Confederation (ITUC) or the network Women in Informal Employment: Globalizing & Organizing (WIEGO). International bodies such as the International Labor Organization (ILO), UN-Women, the Commission on the Status of Women, and the European Parliament have also taken a stand (Fish 2017; Garofalo Geymonat and Marchetti 2017). Finally, the International Domestic Workers' Federation (IDWF) has been active at the global level as an umbrella organization promoting domestic workers' groups in all countries since 2012. Thus, we are confronted with a mix of old and new actors active at the local, regional and global levels, whose attention has been attracted by the emergence of domestic workers' rights as a (new) relevant policy issue.

In order to tackle this complex scenario, the present study concentrates on what is arguably the most important event in this field at the global level, that is the ILO Convention No. 189 "Concerning Decent Work for Domestic Workers" (C189), accompanied by Recommendation n. 201², promulgated in Geneva in 2011. We take C189 as an example of an intervention that took place at the international level but in whose wake a series of different actions and events have taken place at national levels, differing by country. The Convention demands that ratifying countries ensure equal treatment between domestic workers and workers from other sectors, in relation, for instance, to minimum wages, working time and overtime compensation, daily and weekly rest and paid leave, collective agreements, occupational health and safety, and social security protection, as well as the promotion of workers' organizations. These are crucial normative and symbolic advancements given the traditional lack of rights for this category of workers, who are entirely or partially excluded from labor laws and protection in most countries.

¹ When necessary, the writing of this article can be attributed in the following way: Cherubini sections 2, 4.2 and 5; Garofalo Geymonat sections 1, 4.3 and 4.4; and Marchetti sections 3 and 4.1.

²https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO::P12100_INSTRUMENT_ID:2551460 Last accessed January 5th, 2019.

The ILO Convention is an attempt to address domestic workers' labor rights as "global rights" in order to overcome not only the discrimination that these workers experience in their working lives, but also to eradicate the stigmatization that underpins their general segregation at the social level. Indeed these workers usually belong to the most impoverished and socially stigmatized groups (migrants, low-caste people, black and indigenous women, women of colour and so on) depending on the context, who are negatively affected by the intersectional construction of gendered, racialized and class-based representations of care and domestic tasks (Hoerder, van Nederveen Meerkerk and Neunsinger 2015). From this perspective, domestic workers' labor rights can be seen as a "global" common goal due to their implications at the level of human and social rights for a wide range of vulnerable subjects in many countries.

Domestic workers' labor rights are a relevant case to consider in seeking to understand how a transformative process underway at the international level can be transferred, negotiated, modified or strengthened - but also ignored or rejected - at the national level due to the different interventions of relevant actors. Our question is indeed in what ways, and under which conditions, what we identify as "global rights" can be transferred to the level of "local struggles". From this perspective, there is lack of knowledge about the relationship between C189 as an instrument of global governance promoting domestic workers' rights as "global rights", and the processes taking place around its ratification and, more generally, towards the improvement of domestic workers' labor rights at the local level with respect to the C189.

Our study contributes to filling this gap by offering an analysis of events in four countries - Colombia, Italy, the Philippines and Taiwan - following the promulgation of C189. Relying on Strategic Action Field theory (Fligstein and McAdam 2012), we examine national differences between the actors involved in these processes, focusing on their actions, the alliances they establish, and the frames they activate, with respect to domestic workers' labor rights. By considering these elements as embedded in the cultural, social and political context of each country we highlight the various articulations between global and national levels and the ways in which C189 and the global campaign for its ratification have been incorporated, fueled or resisted in different local contexts by both state and non-state actors, from a social movement perspective.

This study is part of an ongoing research project addressing domestic workers' rights in nine countries: India, Germany, Spain, Brazil and Ecuador, Taiwan, Italy, the Philippines and Colombia. The same framework will be used to analyze the other country-cases, as well as the actions that have taken place at the international level, aspects that fall outside the scope of this paper.

In the remainder of the article, we first discuss developments in the recent scholarship on C189 and on domestic workers' organizing for rights, highlighting the ways in which attention to this movement can enrich our understanding of the relationship between processes of transformation at the international and national levels. We then present the methodological approach we used, which involves looking at domestic workers' rights in each country as a strategic action field and analyzing their transformation by considering C189 as an exogenous factor. In the final section, we illustrate the results for each of the country cases, and the strategic action field emerging around the same contentious issue in each national context. Our work indicates that the processes of translating "global" domestic workers' rights at the local level tend to involve several actors, with contrasting interests and potentially diverse framing processes. C189 seems to have been better received and to be fostering transformations in terms of mobilization and the enlargement of rights in those contexts in which it has promoted synergy between state and civil society actors, has been embedded in pre-existing local struggles and in larger progressive political projects, and has been framed in ways that touch on issues of national identity.

2. The ILO Convention n. 189 and the "global" rights of domestic workers

The past two decades have seen increasing interest in the relationship between civil society, governments, international organizations and what can be called "global agendas" (Della Porta, Kriesi and Rucht 1999; Smith and Johnston 2002; Smith 2004). A classic example of the construction of a "global agenda" has been identified in the process activated for the formulation of the Millennium Development Goals, during which national and international NGOs and institutions worked simultaneously to prepare, and are now committed to the pursuit of, these goals (Fukuda-Parr 2004; Kabeer 2003). This literature questions the effectiveness of different methods, ranging from lobbying to protests or consultations, that NGOs and civil society more generally adopt to influence international institutions, but also debates what the most effective method to foster the implementation of international frameworks at local levels may be. Dilemmas such as these have been addressed by Nora McKeon (2009) for the United Nations, by Jan Aart Scholte (2009) for the WTO, and by Jens Steffek, Claudia Kissling and Patrizia Nanz (2007) for the European Union, amongst others. This perspective has also been useful in looking at women's rights. Indeed, especially after the 1995 UN Assembly in Beijing, several studies investigated the functioning of the connections between international and national levels for gender issues: Janet Conway (2008) has investigat-

ed how women's movements are connected globally through the initiative of the World March of Women, whilst authors such as Sylvia Walby (2002), Martha Nussbaum (2001), Neila Kabeer (2003) and Peggy Levitt and Sally Merry (2009) have established a field of scholarship which explores the limits, difficulties and potential developments of international norms surrounding women's rights at local levels.

Along this line of analysis, ILO Convention 189 can also be considered an instrument for the governance of "global" rights, which can be transferred (or not) to the national level in a variety of ways. An expanding body of literature on C189 has started to address this issue. Indeed, some scholars have taken the mobilization around C189 as a paradigmatic example of the scaling up of local/national movements and the formation of a transnational collective actor: for instance, they have described the key role played by the International Domestic Workers' Network (IDWN, later International Domestic Workers' Federation) and by some regional and national organizations in the drafting of the C189 in 2011 in Geneva (Schwenken 2016; Fish 2017). Scholars have focused on the legal advancements brought about by signing the Convention into national laws (Du Toit 2011; Albin and Mantouvalou 2012; Gallotti and Mertens 2013; Rosewarne 2013; Visel 2013), and some have looked at the impact of C189 on social movements and the political processes related to campaigns for its ratification, reception and implementation (Schwenken 2013; Blofield and Jokela 2018; Marchetti 2018).

Equally important is the work that has been done on the historical roots of C189, identified in the ILO campaign for the promotion of "decent work" in flexible and non-standard jobs and in the multiple debates on fair development, women's work and migrant work which have animated the ILO agenda since the 1990s (Schwenken, Prügl, Pabon, Hobden and Ally 2011; Boris and Fish, 2014). Research on ILO interventions in the field has shone a light on how the goals of promoting "decent work" and contrasting multiple discriminations at work have been pursued by appealing to both labor rights (which constitutes the main scope of activity of this UN body) and to the principle of human rights and dignity (Marchetti 2018). This is clearly reflected in C189, which unites a central prescription of equal labor rights for domestic workers with a request for recognition of their dignity as human beings, as the reference to "decent work" in its title suggests. Moreover, C189 also incorporates a gendered approach, appeals to the issues of race, ethnicity, religious and class-based discrimination at work, and includes a balance between the principle of equal labor rights and protection of the most vulnerable categories of domestic workers, including migrant workers (Schwenken 2013; Fish 2017).

Moreover, important contributions to the understanding of domestic workers' organizing for rights have been produced before and beyond C189, investigating organ-

izations active at the national level for the most part³, as well as those operating at the international level⁴. Some of these studies have embraced a cross-country comparative perspective⁵.

This literature highlights the diversity of actors and interests involved in the struggle around domestic work regulation and domestic workers' rights. Several institutional and non-institutional actors – representing the divergent and often conflicting interests of employers, agencies, (migrant and native) workers, welfare institutions and the state, among others – may enter this field, either supporting or countering the aim of improving domestic workers' rights and conditions. Besides domestic workers' grassroots organizations and unions, these actors may encompass other civil society organizations, traditional unions and workers' movements (Boris and Nadasen 2008; Chun and Cranford 2018), women's and feminist movements, anti-racist and ethnic minority movements (Bernardino-Costa 2014), and humanitarian NGOs (Chun and Kim 2018), as well as organizations representing employers' interests (Chien 2018), governmental bodies, state institutions, international organizations (Blofield 2012), and so on. The role of these actors, their position in the field and their interactions are context-specific issues open to empirical analysis.

Existing literature also offers relevant insights into the variety of framing strategies (Benford and Snow 2000) undertaken by domestic workers and their supporters in order to organize their struggles and make their claims meaningful to their constituencies and potential allies. For instance, Bridget Anderson (2010) and Helen Schwenken (2003) point out two competing ways of framing the struggle for improving domestic workers' conditions in European public debate in the 2000s, namely the "trafficking"

³ Studies focus on national domestic workers' organizations active in the United States (Boris and Nadasen 2008; Coll 2010; Tudela-Vazquez, 2016), Canada (Pratt 2018), Italy (Andall 2000; Sarti 2010), the United Kingdom (Anderson 2010), Hong Kong (Constable 2009), South Korea (Chun and Kim 2018), Taiwan (Chien 2018), India (Menon 2013; Agarwala and Saha 2018), South Africa (Fish 2014; Ally 2009; Cock 1989), Mexico (Thomson 2009; Garcia and Lopez 2018), Brazil (Bernardino-Costa 2014; Cornwall, Oliveira and Gonçalves 2013) and other Latin American countries (Chaney and Garcia Castro 1989; Goldsmith Connelly, Canedo, Ferrari and Vence 2010).

⁴ With respect to international organizations, Helen Schwenken (2003) has studied the network RESPECT for undocumented domestic workers in several EU countries; Geraldine Pratt (2012) and Daiva Stasiulis and Abigail Bakan (2003) the transnational organizations of Filipina domestic and care workers living in Canada; Mary Goldsmith Connelly (2010) the Latin-American and Caribbean Domestic Workers Federation CONLACTRAHO; while the International Domestic Workers Federation (IDWF) has been studied by Eileen Boris and Jennifer Fish (2014), Jennifer Fish (2017) and Helen Schwenken (2016).

⁵ Cross-national studies have compared domestic workers' organizing in South Korea and the United States (Chun 2009, 142-170), in Mexico and the United States (Tilly, Rojas Garcia and Theodore 2018), and in different Latin American countries (Blofield 2012; Blofield and Jokela 2018).

and the “rights” frames. The first focuses on exploitation in domestic service and represents domestic workers (especially migrant workers) as “victims” of trafficking in women or “modern day slaves”, while the second addresses the problem as a matter of equal rights – that, according to these authors, can be further articulated either as women’s rights, migrants’ rights, human rights or workers’ rights. Shereen Ally (2009) and Jennifer Fish (2014) describe how South African domestic workers’ organizations succeeded in presenting the goal to overcome gendered and racialized discrimination against domestic workers as touchstones of the democratic transition after 1994. In that context their claim for enlarging domestic workers’ rights was framed as part of the process of “defining features of the new nation” which had started after the end of apartheid (Fish 2014, 233). Other studies draw attention to the call for simultaneous recognition as workers *and* as human beings, which is the core request advanced by domestic workers’ movements at the transnational level (Boris and Fish 2014; Fish 2017; Garofalo Geymonat and Marchetti 2017), as well as in several national contexts (Chaney and Garcia Castro 1989; Agarwala and Saha 2018; Moore 2018).

It is important to consider the ways in which the goal of improving domestic workers’ rights challenges the sedimentation of cultural, social, economic and political discourses which have historically determined the vulnerable position of these workers in society (Hoerder *et al.* 2015). At the symbolic level, these discourses legitimize the devaluation of their work, and the mistreatment and abuses they experience. As domestic work is not understood as “real work”, likewise these workers are not seen as full subjects entitled to rights and recognitions. Several scholars illustrate the different powers that shape this discriminatory setting, immersed in intertwining systems of gender, class and racial relations (Glenn 1992).

In a class based and racialized perspective, Raka Ray and Seemin Qayum (2009), amongst others, speak of a “culture of servitude” that characterizes India - and indeed many other countries – in shaping a demeaning representation of domestic workers as ‘others within’, separated from the rest of society due to their association with stigmatized bodily functions and care needs. At the same time, gender-based assumptions see domestic workers as ‘not real workers’ because their activity is seen as an extension of family duties and of the natural disposition to care attributed to women in general. This has to do with the unequal distribution of reproductive labor between men and women, maintained in the commodification process of care-services which has expanded in recent times (Folbre 2001; Boris and Parreñas 2010).

These different discriminatory discourses converge in the context of globalization to affect the representation and experience of international migrants hired for domestic and care work in industrialized and wealthier countries (Parreñas 2000, 2012; Ehren-

reich and Hochschild 2003; Lutz 2011; Romero, Preston and Giles 2014; Michel and Peng 2017). According to Bridget Anderson (2014), the case of migrant domestic workers highlights the contrast between two main discourses in destination countries: the need of ageing societies to recruit foreigners due to their “care deficit”, versus nationalistic sentiments pushing for restrictive migration policies (Sarti 2007; Gutiérrez-Rodríguez 2010; Triandafyllidou 2013; Romero 2018). This results in a difficult position for migrant domestic workers as those who are needed and simultaneously rejected: the “others” in a nation where they are only temporary and “partial” citizens (Parreñas 2001).

Overall, the literature on C189 and on domestic workers’ organizing for their rights suggests an opportunity to take into account interactions between different actors and the deployment of different framing strategies and alliances while paying attention to different scales of analysis – national, transnational and international. However, the ways in which these aspects influence actual concrete change in the rights of domestic workers are not pre-determined or unique. It is interesting to explore how these frames operate together with other elements, such as particular alliances, roles of incumbent actors, and so on, across different contexts and in response to different events. In the next section we present the approach we propose in order to take into consideration how these various elements contribute, together, to the processes of translation of C189 into struggles at the national level.

3. Domestic workers’ rights as a strategic action field: fieldwork and methodology

The present analysis is part of a broader ongoing study on paid domestic workers’ rights and conditions in nine countries in Latin America, Europe and Asia named “DomEQUAL: A global approach to paid domestic work and social inequalities” (2016-2020). The selection of the countries – Italy, Germany, Spain, India, the Philippines, Taiwan, Colombia, Brazil and Ecuador – was made in relation to their global, intra-regional and country-to-country comparability. In particular, all are countries where a developed body of scholarly literature and statistical data on paid domestic work already exists, and in which the main legislative reforms for the labor rights of domestic workers were discussed (though not always successfully) between the 1950s and the formulation of the project in 2015, and which had shown, within that same timeframe, some dynamism with respect to domestic workers’ organizations. The DomEQUAL project entails more than 200 qualitative in-depth interviews with key informants, i.e. ac-

tivists, organizers, policy-makers and experts, in the field of care and domestic work and in related fields, such as labor, feminist, anti-racist, ethnic minority and disability rights movements. The project also includes the collection of statistical data and documents produced by organizations of paid domestic workers and other relevant actors, as well as ethnographic observation during meetings and workshops with local stakeholders. For reasons of space, this article is based on interviews with key informants in Colombia, Italy, the Philippines and Taiwan only. These interviews were carried out between April 2017 and March 2018 by the local researchers⁶ employed by the project. The analysis of these interviews is also supported by participant observation and conversations held by the authors of this article during short visits and at workshops held in these countries in October 2017 (Colombia), December 2017 (Italy), and January 2018 (Taiwan and Philippines).

The data was analyzed using categories drawn from Strategic Action Field theory, which allows us to look at large datasets introducing some comparability, while at the same time allowing for a thick analysis of the multi-dimensional complexity of the processes of transformation taking place at the levels of social movements, legal frameworks, and so on.

Neil Fligstein and Doug McAdam (2012) use the notion of the “strategic action field” to describe a meso-level dimension in which individual and collective actors interact with each other in light of a shared (yet not consensual) focus. Importantly, it is a commonality of concerns (called the “focus”) that shapes the contours of an action field, along with the interpretative frames that actors mobilize to make sense of their, and other actors’, actions: namely through explaining the problem, identifying possible solutions, gaining consensus and motivating actors to take action with respect to the field goals and foci. These interpretative frames contribute to shape the dynamic boundaries of the field for each country (ibid 2012), since they help to build a (temporary) consensus around what is at stake and what is happening in the field, while connecting the demand for domestic workers’ rights to broader cultural elements of the context and discourses circulating in society at large, allowing for or preventing strategic alliances with other movements. Transformations in the field are not always the result of internal forces - they can also result from what the authors (ibid 2012) identify as “exogenous changes” which affect existing fields or may lead to the creation of new ones. Finally, Fligstein and McAdam (ibid) also consider the importance of “incumbent

⁶ We thank our country-experts for their contribution: Maria Fernanda Cepeda (Colombia), Peicheh Hsu (Taiwan), Verna Viajar (Philippines) and Beatrice Busi (Italy).

actors” in strategic action fields, namely those actors imposing their views and thus directing the main actions in the field.

In addition to the categories of the strategic action field approach, we also produced a heuristic variable to account for the “level of mobilization” regarding domestic workers’ rights in each country. This is based on our qualitative assessment of the intensity and frequency of actions, public debates, sensitization initiatives and other interventions carried out by civil society actors. This also accounts for the fact that each country has a different tradition of political and social engagement.

Drawing on these categories, we proceeded to analyze our data in a way that allowed us to look at what happened in each of our country-cases with reference to fields of action shaped by the promulgation of C189, considered as an exogenous change.

4. Local struggles? Domestic workers’ rights in four countries

As mentioned, this article discusses events in Italy, Colombia, the Philippines and Taiwan during the time from the promulgation of C189 in June 2011 to the end of our fieldwork in March 2018. In this section we organize our discussion of the four country-cases on the basis of the tendencies and dynamics emerging in each context. In particular, we will discuss the following elements for each case: 1) the setting, which includes the legal framework, the actors and their foci, 2) the frames mobilized in each context, and 3) the process of changing configurations in the strategic field of action, that is co-created by the actors, who develop alliances and embrace foci and frames.

4.1. Italy: an impasse on labor issues in a migratory context

Italy is a telling case due to the large number of Italian households that employ a migrant domestic worker or caregiver, a situation due to the rapid ageing of Italian society and the crisis of its family-based welfare model (Ambrosini 2016). Jobs in this sector are filled mainly by Eastern European migrant women, with short-term or circular migration projects. About 860,000 migrants are legally employed in the care and domes-

tic sector⁷, but some estimates accounting for undeclared workers state 1.6 million as a more accurate number (ISMU and Fondazione Censis 2013).

With respect to specific legislation regulating this sector, the first (and still valid) law on domestic labor dates back to 1958, followed by a collective agreement in 1974. Italy had high levels of mobilization around domestic workers' rights between the 1950s and the 1970s, the times when their national laws and main reforms were adopted. Yet the context has changed significantly since the 1970s, with this sector becoming a niche for foreign rather than Italian labor. During the period of our analysis (2011-2018) the country had low levels of mobilization on the issue of domestic workers' rights, whilst questions surrounding the irregular migration status of these workers and racist and sexist abuse against migrants (women especially) tended to overshadow other issues. In fact, this category of workers is particularly affected by new migration policies, especially in relation to recruitment quotas for migrant workers, policies against trafficking, and policies on family reunification. Reforms with respect to access to residency and citizenship rights would allow for the regularization of a large number of undocumented or temporary migrants in this sector. Within this scenario, it is not surprising that domestic workers' issues are framed by activists, the media and society in general as a migration issue, thereby marginalizing the issue of labor rights *per se*.

In Italy today domestic workers' organizations are not particularly visible, fulfilling a very institutional, almost bureaucratic function. Domestic workers can be members of the main trade unions - *Cgil*, *Cisl* and *Uil* – or of the *Acli-Colf*, a self-organized group of (Italian and migrant) domestic workers founded in the 1950s with the support of the Catholic Church (Andall 2017), but use these for service provision rather than for rights advocacy. To comply with C189, leaders from these organizations stressed the need to improve the current national collective agreement on domestic work, particularly in relation to maternity rights and social security coverage, which remain limited in compared to those for workers in other sectors. Yet no relevant actor is taking the necessary steps in this direction or mobilizing in a strong way for the improvement of domestic workers' collective agreements, as the attention of trade unions is on other, more vocal, labor sectors (manufacturing, new-economy, education, and so on).

Considered together, these elements confer a particular meaning to the 2013 ratification of C189, and to developments thereafter. Ratification itself was very quick, taking place immediately after promulgation. Experts and organizers recalled that it took place in a top-down manner, and was never really discussed with domestic workers'

⁷ INPS, *Osservatorio sui lavoratori domestici*, 2017.

<https://www.inps.it/webidentity/banchedatistatistiche/menu/domestici/main.html>. Last accessed February 1st, 2019.

groups. It appears that in 2013, the Italian government considered the ratification of C189 as a mere bureaucratic step, believing that Italian legislation was already in line with its requirements. This allowed Italy to acquire a positive international image, especially as a recipient of migrants in this sector, whilst failing to engage with the content and “spirit” of C189 as a whole. Therefore, the ratification of C189 was not followed by adequate policy measures, and further action is needed for full implementation of C189 requirements, mainly in the area of improvements in the national collective agreement mentioned above.

We could thus say that Italy finds itself at an impasse characterized by state politics which, at least at the formal level, wanted to ratify C189, and a simultaneous lack of mobilization among domestic workers’ organizations and civil society in general on this matter. Not only did the C189 ratification fail to inspire change, it can also be seen as positively contributing to that lack of change in the sense that its partial implementation contributed to the legitimation of a situation where adherence to an international convention covers up exclusion from rights at the local level.

Crucially, this situation is affected by the fact that the sector consists mainly of temporary (or newly arrived) migrants who prioritize access to migration and citizenship rights rather than labor rights as such. This merges with the attitude of Italian employers and Italian society in general, where the difficulties of domestic and care workers are framed as “abuse against migrants” rather than as labor issues. Finally, it also dovetails with the tendency to relegate migrant workers to sectors which are less protected and less remunerated than others, and are also outside the agenda of the labor rights’ movement.

4.2. Colombia: embedding global rights in local struggles for social justice

Colombia has a large domestic work sector of around 681,000 people, in 2017⁸, mostly composed of national workers that are mainly women from poor rural areas and the regions most affected by internal armed conflict⁹. Colombia ratified the Convention with Law n. 1595 of 2012, and thereafter the government adopted a number of measures, mainly in order to include this category of workers in the social security

⁸ Departamento Administrativo Nacional de Estadística, *Gran Encuesta Integrada de Hogares*. <https://www.dane.gov.co/index.php/estadisticas-por-tema/mercado-laboral/empleo-y-desempleo/geih-historicos>. Last accessed February 1st, 2019.

⁹ According to available census data (2005), 41% of domestic workers were internal migrants and/or refugees. <https://www.dane.gov.co/index.php/estadisticas-por-tema/demografia-y-poblacion/censo-general-2005-1>. Last accessed February 1st, 2019.

system. Beyond these legal improvements, ratification provided the opportunity for a renewed politicization of the issue of domestic workers' rights after decades of low visibility due to internal armed conflict. Notably, domestic workers' organizations had existed in the past and campaigned for changes in the law, but were affected by political violence and the general repression of social and labor movements until recent years. Today, the field of domestic workers' rights in Colombia is characterized by a combination of vivid dynamism at the civil society level and the involvement of institutional actors, political parties, and non-governmental organizations active in the human rights, development and labor fields, such as CARE International, the German Foundation Ebert, and the Colombian Escuela Nacional Sindical and the Fundación Bien Humano. Importantly, the 2010s saw the creation of new domestic workers' unions, such as the Unión de Trabajadoras Afrocolombianas del Servicio Doméstico (UTRASD) and the domestic workers' chapter of the food industry union (Sindicato Nacional de Trabajadores de la Industria de Alimentos, SINTRAIMAGRA). These new unions began their activities alongside but separately from existing organizations such as UTRAHOGAR and SINTRASEDOM.

This process of change was not initiated solely by the ILO campaign on C189 however. Rather, it was part of a wider transformation process underway in the country which had a positive impact on domestic workers. In the context of the peace process (2012-2016), awareness of women's rights and the conditions of racialized people rose after over 50 years of conflict that had greatly damaged Afro-Colombian and indigenous women in particular.

Against this background, UTRASD presents itself as the "first ethnic-based domestic workers' union" in the country, concerned equally with ending racist discrimination against Afro-Colombian women working in the sector and with the advancement of labor rights for all domestic workers. The demands of current domestic workers' groups explicitly go beyond C189 to advocate for more radical change in the conditions of domestic workers at the legislative, social and economic levels. After the ratification of C189, domestic workers' organizations and their allies successfully campaigned on related issues, such as the right to the thirteenth month of payment, achieved with the "Ley de Prima" in 2016. The campaign was promoted by UTRASD in alliance with the Fundación Bien Humano, the Escuela Nacional Sindical and two feminist congresswomen from the Alianza Verde party, who played a key role in the process. The building of this coalition was facilitated via involvement in the Working Group on the Care Economy, a space of planning and negotiation inspired by the feminist debate on the commodification of care and made up of both institutional and non-institutional actors. The achievement of this law is particularly interesting, because the "prima" is an addi-

tional bonus that all workers in Colombia receive twice a year in recognition of their contribution to the country's wealth. The broadening of the "prima" to domestic workers brought the issue of the value of all domestic and care work, and the necessity to acknowledge this category of laborers for their contribution to the country's wealth, to the forefront of public debate. The precondition for this campaign was the National Law on the Care Economy, approved in 2010, which gives full recognition to the social and economic value of unpaid care and domestic work. Domestic workers' groups and their allies used this law to overturn the argument that excluded them from the extra monthly salary, which implied that domestic work did not produce profit.

In this context, the feminist debate on the "care economy" provided a favorable frame for domestic workers' organizations because it contributed to the transformation of the general understanding of care and domestic work, allowing a convergence between domestic workers' struggles for labor rights and feminist struggles to transform the socio-cultural representation of reproductive work. In Colombia, the rights of domestic workers are seen as part of a larger political project for social justice and as part of a wider movement against the discrimination of marginalized groups in the search for a post-conflict national identity.

4.3. The Philippines: concerns for diaspora pull national reforms along

The discussion on domestic workers in the Philippines highlights the interdependence between the international level, with the Filipino diaspora of an estimated 10 million people in the domestic work sector in 2014 playing a crucial role¹⁰, and the national scenario, where domestic workers were estimated at around 1 million in 2010¹¹. The Philippines is widely known as the "sender" of many women workers to the cleaning, care and health sectors around the world, and at the same time Filipino society is highly reliant on domestic workers, most often from rural areas. The field is correspondingly strong in terms of engagement with issues of both international politics and questions of gendered national identity.

The government was one of the first in the world - and the only so far in the Asian context - to ratify C189 in 2012. A national law, the Domestic Workers' Act (Batas

¹⁰ Commission on Filipinos Overseas, *Stock Estimates of Overseas Filipinos*, <https://cfo.gov.ph/news/34-statistics/30-stock-estimates-of-overseas-filipinos.html>. Last accessed February 1st, 2019.

¹¹ Philippine Statistics Authority, *Census of Population and Housing of Philippines*. <http://www.psa.gov.ph/> <https://psa.gov.ph/statistics/census/population-and-housing/2010-CPH>. Last accessed February 1st, 2019.

Kasambahay), was passed in 2013 providing domestic workers with a minimum wage, mandatory social protection, weekly days off, written contracts and a system of skill certification organized by the state Technical Education and Skills Development Authority (TESDA), amongst other things.

Our research participants recalled how the Department of Labor (DOLE) and the Philippine Overseas Employment Administration (POEA) had both been supportive of the ratification of C189, and how the Philippines had played an important role in the its negotiation in Geneva. The demand to protect its diaspora workers has positioned the Philippines *de facto* at the forefront of the process of global rights under C189, and this in turn forced change at the level of local rights with regard to domestic workers employed in the Philippines. Our interviewees returned repeatedly to the issue of the scale of international migration into domestic work among women, and stressed how abuses abroad were one of the main arguments to convince state agencies, legislators and employers' organizations to support the promulgation of C189, the country's ratification of it, and the vote for the national law.

Remarkably, this fast-paced policy change was organized around an ad hoc tripartite institution, the Technical Working Group (TWG) - an inter-agency and multi-sectoral technical body created in 2009 and still operational today that convenes state institutions, workers' organizations and employers' organizations, and is facilitated by the ILO's Manila Office. Among other duties, the TWG has supported some forms of worker-led organizations, and membership of general unions among domestic workers as required by C189 and the national law. However, domestic workers' organizing has begun only recently with the foundation of the domestic workers' organization UNITED in 2015, supported by the International Domestic Workers Federation (IDWF). The group counts around 2000 members today.

At present most rights advocates, including those active in the TWG, are not domestic workers' organisations, but allies, and the issue of representation is hotly contested in the field. The most prominent non-governmental advocates of workers' rights are general trade unions such as the Federation for Free Workers (FFW), Associated Labor Union (ALU), the Trade Union Congress of the Philippines (TUCP), and informal workers' organizations such as the Labor Education and Research Network (LEARN) - strongly influenced by the feminist movement on this topic. A crucial role was also played by anti-trafficking organizations, such as Visayan Forum, as well as by international NGOs working on migrants' rights, such as the Center for Migrant Advocacy, aid agencies such as the Swedish SIDA and USAID, and political organizations such as the German Foundation Ebert, and the Finnish SAKS.

The actual implementation of domestic workers' rights remains limited today, with some of the new law's provisions yet to be enforced, and organizations working with workers reporting that Filipino domestic workers may be experiencing similar conditions to those before the Kasambahay Law. Among these are low pay; a lack of a standard employment contract; long working hours, especially for live-in domestic workers; unenforced days off and overtime pay; assignment to work not agreed upon or work for relatives; unenforced social protection benefits (i.e. social security and health insurance); and, in some cases, physical, verbal and sexual abuse. Whilst the Domestic Workers' Act provides that domestic workers can join a labor organization of their own choosing, mediation, grievance handling, and collective bargaining are not been mentioned in the law, and neither are provisions for labor inspections. Moreover, the law only covers live-in and full-time workers, excluding those who work part-time or for several households.

Even though there is still a long way to go in the Philippines with respect to objectives still to be achieved, and the process has not been smooth or without obstacles, C189 can certainly be seen as responsible for initiating a kind of dynamism as might be expected from an international initiative of this kind. C189 was a catalyst for the advancement of domestic workers' rights in the country due to a strong synergy between the ILO and the state, which together united state and non-state actors in the field.

4.4. Taiwan: local struggles against migrant segregation

In Taiwan domestic workers' rights have become highly visible in public debate, the media, and academic literature in the last fifteen years. Resembling the Italian case in this respect, Taiwan also has a strong need for workers in this sector due to a rapidly increasing elderly population and corresponding care needs (Lan 2007). However, the current system is much criticized for failing to provide good quality care and, at the same time, failing to prevent violations of fundamental rights and the mistreatment of migrant workers from South-East Asia, estimated at around 240.000 (Council of Labor Affairs 2016) and who constitute the near entirety of the workforce in paid care work within private Taiwanese households. While the country's reliance on temporary foreign workers in this sector has grown steadily since 1992, public policies on care needs only cover national workers (under the Long-Term Care Services Act, in effect 2017), and include the declared goal of overturning this tendency to develop a long-term care system with roles occupied by local workers. The state appears highly committed to regulating national borders and controlling the movement of migrant workers, but does not engage with their work from a labor perspective (Liang 2014).

In studying this scenario, it was important to acknowledge that the discussion of the relations between global rights and national struggles required a slightly different lens because the country is not a member of the UN, and cannot therefore ratify C189 or discuss it in the same way as other the states considered¹². However, our findings indicate that the emergence of domestic workers' rights as "new" global rights clearly influence the field, and that the principles of C189 are present in the debate. For example, they were explicitly included in a law reform proposed by the TIWA (Taiwan International Workers' Association) in 2011¹³.

In this respect, the first focus in the field is to overcome segregating legislation. Laws that apply to national and migrant care and domestic workers are very different. In particular, Taiwanese care workers are part of a system that certifies them and regulates their work both in households and in care homes. Even though their working conditions are difficult and their rights are not fully equal to those of workers in other sectors, they are much better than those of foreign care workers. As live-in workers, foreign workers are exposed to serious forms of exploitation, including long working hours, low salaries, lack of time off, and sexual harassment. Moreover, as officially ruled by the Ministry of Labour in 1999, they are not protected by the Labor Standards Act which is the law regulating all employment.

Against this backdrop, participants identified the role played by intermediaries, agencies or brokers, as crucial. The latter occupy a uniquely powerful position due to the fact that they are legally recognized as both recruiting agencies in countries of origin, and as labor agencies in Taiwan. Although Taiwan has progressively passed laws to limit these agencies from charging foreign workers service fees and checking their work, activists reported that workers are *de facto* asked to pay a sizeable introduction fee prior to their arrival in addition to monthly fees for services. This means they are unable to earn any money in their first year in Taiwan, and pushes increasing numbers of workers to run away and become illegal immigrants.

This difficult situation has been denounced on several occasions by local media and human rights organizations, international NGOs, religious organizations and anti-trafficking organizations. Pro-migrant groups, such as the Taiwan International Workers' Association (TIWA, founded in 1999), in collaboration with other groups gathered in the Migrant Empowerment Network Taiwan (MENT), and, more recently, the Serve the People Association (SPA, and grassroots women's rights groups such as the Awak-

¹² Taiwan has signed other conventions and covenants, for instance the CEDAW (Convention on the Elimination of all Forms of Discrimination Against Women) and the ICCPR (International Covenant on Civil and Political Rights).

¹³ <http://www.tiwa.org.tw/blog/index.php?itemid=464>. Last accessed February 1st, 2019.

ening Foundation and grassroots organizations working on care provision such as the Peng Wan-Ru Foundation, have been particularly active. Organizations in the field have managed to build large alliances over time, and have mobilized various frames, including those of migrants' rights, human rights, labor rights and the provision of public care (Ku 2009). The alliance with organizations for people with disabilities, care recipients and their families is more complicated, as some of these opposed the proposed "Household Service Act", arguing that ordinary families could not afford the changes in workers' rights it would bring. This proposal, never passed but still a central focus of the field since it was first formulated in 2003, includes rights such as privacy rights; entitlement to National Health Insurance and Labor Insurance; the right to terminate a contract and transfer to another employer; the regulation of minimum wages and overtime pay through the Labor Standards Law; the regulation of working hours, rest time, days off, annual leave, and educational leave; and legal assistance for workers (Liang 2014).

Overall, our key informants portrayed a vivid dynamism in the field of domestic workers' rights in Taiwan as far as grassroots organizations and human rights organizations are concerned. Yet this dynamism is accompanied by very slow progress in terms of improvements in workers' rights. The number and virulence of those opposing domestic workers' rights is worthy of note in comparison with the other country cases: domestic workers' rights are opposed not only by employers' interests but also by parliamentarians opposing pro-migrant reforms and agency brokers who act as market intermediaries with the support of the government.

5. Conclusion

Our article has shown how the impact of international processes oriented to "global rights" varies in national contexts according to the types of actors involved in the field, the relationships between them, and the focus they share. We argue that, for our cases, where ILO Convention 189 has been taken up only by the state in a top-down dynamic (such as in Italy), or only by civil society organizations without any institutional engagement (such as in Taiwan), impact was less likely, while the simultaneous engagement of international actors, state actors and civil society fostered transformations (such as in Colombia and the Philippines).

Our article also emphasized the framing processes underpinning campaigns for domestic workers' rights in connection with the wider cultural, social and political background of each country. Some discursive frames seem to be connected to more or less

favorable processes for the local reception and translation of the principles of C189. When considering discursive frames, our cases suggest that domestic workers' rights are favored where a combination of the following elements is in place:

1) When most domestic workers are national citizens *and* the country is in a progressive phase. In such settings improving the condition of domestic workers is seen as a step in a wider move against the discrimination of marginalized groups and towards a more egalitarian national identity. This is the case for Colombia and the Philippines. Conversely, we found that in countries where domestic workers were associated with "others" from outside the nation, campaigns remained isolated and issue-specific, and it was difficult for activists to build a broad consensus beyond pro-migrant actors. This is the case for Italy and Taiwan.

2) When domestic workers' rights are seen as part of a larger political project for social justice. We found, for example, that the feminist debate on the value of care may become a favorable frame for domestic workers' struggles insofar as it may transform the socio-cultural representation of domestic work, recognize its value and extend the rights of domestic workers. The Colombia case fits this criterion, where debate has resulted in a new law (Ley de Prima) representing a unique experience with respect to financial accounting for the value of care within the national economy. On the contrary, in those contexts where the connection with wider political struggles is weak or absent, the question of domestic workers' rights is framed as a bureaucratic policy issue - rather than a political one, as in the Italy case. The extension of recruitment measures for migrant workers to satisfy demand in this sector is not always accompanied by a critique of the structural factors that affect the setting, as discussed above in the case of Taiwan.

For all these reasons, domestic workers' labor rights are a relevant case to understand the ways that "global rights" can be translated into "local struggles" through an exploration of the diverse impacts of ILO Convention n. 189 and the variety of transformative processes it triggered in national contexts due to the varying roles and actions of relevant actors, frames and alliances.

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