

RESEARCH ARTICLE

The feminist and domestic workers' movements: disconnected practices, discursive convergences

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The article explores the relationship between women's rights and feminist and domestic workers' movements by drawing on qualitative data gathered in a comparative study on domestic workers' rights in Italy, Germany, Spain, India, the Philippines, Taiwan, Colombia, Brazil and Ecuador (2016–21). Despite the frequent disconnection between the two movements at the practical level, a possible convergence may be identified in the discursive frames that domestic workers' rights activists make use of. The analysis focuses on two feminist anti-capitalist frames recurring in mobilisations for domestic workers' rights, addressing the valorisation of reproductive labour and the transnational commodification of care. Domestic workers' activism tends to build on these frames beyond their mainstream forms and to expand them in intersectional ways, enlarging their capacity to include racialised, low-class, migrant and other minority groups. This becomes a creative force at the level of discourse, where different alliances may take place in a less visible way.

Key words domestic workers • feminism • care • reproductive labour • migration • intersectionality

Key messages

- In many countries, a large gap exists between the feminist movement and the movement for domestic workers' rights.
- Activists for the rights of domestic workers often base their claims on feminist arguments on care and reproductive labour.
- Domestic worker activists expand feminist discourses along intersectional lines to include not only gender, but also class, caste and race perspectives.
- The alliance between the feminist and domestic workers' movements can be facilitated by converging around issues of social reproduction addressed in an intersectional perspective.

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1. Introduction

The last decade has seen a resurgence of feminist mobilisations across the globe that tend to bring forward explicit anti-capitalist analyses and claims (Basu, 2010; Luxton, 2014; Evans, 2015; Barca, 2020). These mobilisations have achieved the inclusion of social and political actors that are normally outside the field of gender issues, in particular, anti-racist and pro-migrant groups, the movement against the precarisation of labour, and environmental movements. In relation to this wide inclusivity and capacity for alliance-making of contemporary feminism, Nancy Fraser (2017) says that all these movements are united by the urgent need to question the disruption of the reproductive sphere that accompanies the crisis of capitalism. All these movements, she says, are part of the 'struggles over social reproduction [that] have exploded in recent years' (Fraser, 2017: 35). In this scenario, Silvia Federici and others have emphasised the key role of the domestic workers' movement in exposing contradictions of the capitalist system (Barbagallo and Federici, 2012; Lim, 2016; England, 2017).

Yet, looking at the relationship between feminist and domestic workers' movements, in practice, this ideal convergence is often thwarted by non-collaboration and reciprocal neglect (Blofield, 2012; Bernardino-Costa, 2014; Federici, 2016). The disconnection is probably even more apparent since (migrant) domestic workers have emerged as a new subject of transnational mobilisations during these years of feminist resurgence (Chaney and Castro Garcia, 1989; Boris and Fish, 2015; Fish, 2017; Marchetti, 2018). Indeed, since the mid-2000s, domestic workers' organisations have been remarkably successful, both at the grass-roots level and in gathering support from international actors. Pivotal in this process has been the passing of International Labour Organization (ILO) Convention 189 (C189) concerning decent work for domestic workers in 2011, and the founding of the International Domestic Workers Federation (IDWF)¹ in 2008. Such achievements testify to the global dimension of today's movement for domestic workers' rights, which is also rooted in a long history of domestic workers' organising in some countries and has facilitated policy reforms at the national level.

In this article, we argue that despite this frequent disconnection at the practical level, these two movements have a lot to share in their common critique of contemporary capitalist societies. We observe a possible convergence in the discursive frames that domestic workers' rights activists make use of. In fact, domestic workers' rights activists often seem to build their arguments on the same anti-capitalist frames used by feminist groups, yet they expand them in an intersectional way, enlarging their capacity to also include racialised, low-class, migrant and other minority groups in ways few feminist movements have accomplished.

The arguments we present are based on an analysis of the discourses employed by different actors mobilising for domestic workers' rights in the decade around the passing of C189 (2008–18), gathered in the context of the research project

DomEQUAL (2016–21), a comparative study on domestic workers' rights in Asia, Latin America and Europe.² In this article, we analyse two different, yet interrelated, feminist-derived frames often used in mobilisations for domestic workers' rights: the first originates in the feminist debate on the valorisation of reproductive labour, which domestic workers' rights activists reformulate in order to include their experiences as paid domestic workers of racialised and low-class backgrounds; and the second derives from feminist critiques of the transnational commodification of care, which domestic workers' rights activists discuss in connection with the exploitation of migrant caregivers, thus denouncing the reliance of ageing societies on the cheap and precarious labour of non-citizens to respond to their care crises. We show how domestic workers' activism tends to expand each of these feminist anti-capitalist frames beyond their mainstream forms and to blur the limits that are, in each context, traditionally established among them. This becomes a creative force at the level of discourse, where different alliances operate in a less visible way.

In order to delve into these arguments, we first present the data and methodology used in this article, together with our analytical focus. Second, we discuss the complicated relationship between domestic workers' and feminist movements, drawing upon the existing literature and our past analyses. Third, we analyse the empirical data from the nine countries. We describe the shape of the domestic workers' rights field and the role of feminist actors; then we focus on the two interpretative frames mentioned earlier and look at how they are used and reworked by actors mobilising for domestic workers' rights.

2. Frames and the strategic action field of domestic workers' struggle: fieldwork and methodology

The present analysis is part of a broader study investigating domestic workers' rights in nine countries: Italy, Germany, Spain, India, the Philippines, Taiwan, Colombia, Brazil and Ecuador. These are all countries where major legislative reforms for the labour rights of domestic workers have been discussed (though not always successfully) from the 1950s until today, and where organised domestic workers have been active.

The present analysis is based on more than 200 qualitative in-depth interviews held in these nine countries with key informants, such as activists, organisers, policymakers and experts in the field of care and domestic work. We included actors from other fields that, depending on the country, are relevant to domestic workers' rights, such as activists for labour, feminist, anti-racist, minority ethnic and disability rights. The project also collected statistical data and documents produced by organisations of paid domestic workers and other relevant actors. This material was gathered between April 2017 and March 2018 by the local researchers employed by the project. The analysis of these interviews is further supported by participant observation and conversations conducted by the authors during short visits and workshops in these countries from the end of 2017 to the beginning of 2018.

Our analysis of the relevance of specific frames in the possible alliance between domestic workers and feminist groups derives from our use of strategic action field theory to analyse our data. Neil Fligstein and Doug McAdam (2012) introduced 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 common concern (called 'focus'). Interpretative frames (Benford and Snow, 2000; Johnston and Noakes,

2005) are very important in shaping these concerns and the corresponding strategic field of action, namely, the involvement of specific individual or collective actors and the relationships among them. Specific frames provide actors with tools to understand their problems and identify possible solutions, and to build consensus and take action. Different formulations of such narratives or emphasis on certain topics to create a shared political agenda may (or may not) pave the way to alliances between groups.

Scholars in different contexts have already identified narratives employed in the field of domestic workers' rights as an important object of analysis. Jennifer Fish (2017: 163) identifies gender equity, human rights and economic justice as complex and yet compelling frames around which domestic workers' rights activists have centred their communication strategies to promote C189. These three frames evoke the language of the ILO, which since the 1990s has promoted a notion of 'decent work' that is able to combine the emphasis on human rights with a concern for the living and working conditions of labourers, especially when addressing highly gendered and ethnicised sectors, non-standard jobs, and low-skilled informal workers. Such a use of the human rights frame in international labour law has been identified as a key element of the C189 process, since it facilitated a large and composite coalition supporting domestic workers' demands for decent work and labour rights – considered as human rights (Boris and Fish, 2014; Blackett, 2019; Fontana, 2020).

Other narratives have been adopted by domestic workers' groups in particular national and regional contexts. For example, in South Africa, after the end of the apartheid, according to Shereen Ally (2009) and Jennifer Fish (2014), enlarging domestic workers' rights was successfully framed as part of the larger process of 'defining features of the new nation' (Fish, 2014: 233). Bridget Anderson (2010) and Helen Schwenken (2003) have indicated how in European public debates, two competing ways of framing domestic workers' struggle have emerged, especially during the 2000s: the trafficking and the rights frames. In ageing countries, scholars have analysed the recurrent discourse on care needs or a care deficit, which, as Anderson (2014) stressed, may show the need for foreign workers and, in that respect, be in conflict with a nationalistic discourse that asks for restrictive migration policies (Gutiérrez-Rodríguez, 2010; Van Hooren, 2010; Triandafyllidou, 2013; Romero, 2018).

Following a similar analytical line, we are interested in exploring the role that framing plays in the relationship between domestic workers' movements and feminist groups across different country contexts. This builds on previous results from our project, where the use of specific discursive frames has emerged as crucial in the making of alliances that have contributed to connecting the subject of domestic workers' rights to broader cultural and political issues, and to bringing about policy changes to improve domestic workers' rights (Cherubini et al, 2018).

3. Domestic workers' struggles and the disconnection from feminist movements

To a certain extent, the demand for equal labour rights for domestic workers could be seen as in line with feminist claims, both by improving the conditions of the many women who are domestic workers around the world, and by making a concrete case for the valorisation of reproductive labour, as advocated in feminist debates (Dalla Costa and James, 1975; Federici, 1975; Delphy, 1984; Pateman, 1988; Picchio, 1992;

Folbre, 2001). Previous work based on data gathered within our project has explored part of these conceptual linkages and has shown that they do not automatically correspond to forms of solidarity between the two movements (Busi, 2020; Cherubini et al, 2020). Within the emerging literature on domestic workers' organising, a few studies have addressed the topic, exploring the encounter with and disconnection from feminist actors, both at the international level and in different national contexts.

Eileen Boris and Jennifer Fish (2015) trace back scattered attempts to insert the issue of domestic work in the ILO agenda in the post-Second World War decades, promoted by what they call women experts and individual labour feminists working in government bureaus, United Nations (UN) agencies, trade unions and women's associations (Boris and Fish, 2015: 537–40). As they observe, these attempts were unsuccessful due to, among other things, the lack of support from social movements, including feminists. The authors then point out a change occurring in the 2000s, when the emergence of the global domestic workers' movement made possible the creation of a 'feminist-labour-activist coalition' between the IDWN, the non-profit global network for women informal workers Women in Informal Employment: Globalizing and Organizing (WIEGO) and global trade unions such as the IUF (The International Union of Food, Agricultural, Hotel, Restaurant, Catering, Tobacco and Allied Workers' Associations) (Fish, 2017). This led to the approval of C189 and the subsequent ratification by several nation states. According to Jennifer Fish (2017: 214), another relevant factor was the large support by 'femocrats', meaning women government leaders and delegates, who 'voiced feminist considerations within the debate' and 'used their positions to voice ideologies consistent with the IDWN platform of demands'.

Silvia Federici (2016: 10) discusses the challenges of the alliances between feminist and domestic workers' organisations, and what she sees as a desirable 'recomposition between paid and unpaid domestic workers'. She argues that, particularly in the US context, migrant domestic workers' mobilisations 'have revitalised the feminist interest in the question of domestic work' and have positively contributed to questioning the possibility of solidarity among women and the adequacy of the once-dominant feminist strategy of 'emancipation through wage labor' (Federici, 2016: 10).

Comparative studies of domestic workers' movements in Latin America have shown the historical marginalisation of domestic workers by potential allies, including feminist groups. In her comparative analysis of domestic workers' rights in Bolivia, Chile, Costa Rica and Uruguay, Merike Blofield sheds light on the conflicts of interest between domestic workers and professional and elite women, including many feminists. In fact, the emancipation of the latter from domestic chores and their participation in the labour market depends on the availability of cheap labourers to be employed in their households. As a result, in the region, 'domestic workers' rights have largely remained invisible and passed below the radar of most feminist movements.... Although in some countries individual feminists have adopted the cause' (Blofield, 2012: 59–60).

In Brazil, Joaze Bernardino-Costa (2014) shows how the feminist movement has become a key ally of domestic workers' trade unions, starting from the common struggle for a new Brazilian constitution in the late 1980s. However, the initial distrust between domestic workers and feminist organisations has yet to be fully overcome; instead, significant class and race inequalities, as well as ideological differences concerning the very notion of 'women's liberation', still divide the

two actors (Bernardino-Costa, 2014: 77). In the following, we offer a contextual exploration of the relationships and contradictions of these two movements in the nine countries under analysis.

4. The field of domestic workers' rights and the different feminist positionalities in nine countries

Many of the countries in our study show a high level of mobilisation around domestic workers' rights in the decade under study (2008–18). In this decade, Ecuador, Brazil, Colombia, Spain, the Philippines, India and Taiwan went through a phase of progressive expansion of rights for domestic workers, traditionally absent from the political scene. By contrast, Italy and Germany are contexts with high dynamism in this field in the 1960s and 1970s, while low levels of mobilisation characterise the last decade.

In Ecuador, the question of domestic workers' rights entered the national public debate in the late 2000s as part of broader governmental policies for the expansion of labour rights under the presidency of Rafael Correa of the left-wing party Alianza País (2007–17). This is reflected in the 2008 constitution, which for the first time included paid domestic workers in labour and social security laws, and also emphasised the value of reproductive labour. During 2011–13, the domestic workers' association Asociación de Trabajadoras Remuneradas de Hogar (ATRH), together with international organisations and non-governmental organisations (NGOs), successfully campaigned for the ratification of C189. The campaign was supported by congresswomen from the ruling party, among them Gina Godoy, a feminist lawyer previously active in women's non-profit organisations. Notwithstanding this specific case of support, the domestic workers' and the feminist movements have not since engaged in coalition-building and they do not self-identify as part of the same (feminist) struggle. This is partly due to the fact that during Correa's second mandate, feminist grass-roots movements in the country gradually came to oppose governmental politics.

A different process took place in Brazil under the governments led by Luis Inácio Lula da Silva (2003–11) and by Dilma Vana Rousseff (2011–16) of the Workers' Party. During this time, the national federation of domestic workers' trade unions (FENATRAD) campaigned for a reform of the constitution called *PEC das Domésticas*, approved in 2013, which equated domestic workers' rights to those of other workers. The campaign was largely supported by feminist grass-roots movements and NGOs, including black feminist groups – such as Criola, SOS Corpo and Themis – as well as by national trade unions and politicians from the ruling party. Also important in this phase was the support of Senator Benedita da Silva, an Afro-Brazilian feminist organiser and politician, and former domestic worker. Beyond this particular campaign, domestic workers' organising in Brazil has historically been connected to feminist activism, as well as to the workers' and black movements (Oliveira, 2008; Bernardino-Costa, 2014; Fraga, 2016; Almeida Monticelli, 2017). In the Philippines, the struggle for domestic workers has been intimately linked with that for domestic workers' rights worldwide, in particular, migrant domestic workers who have left the Philippines in great numbers since the 1970s. The Philippines was a key player in the passing of C189, was the second country to ratify (and still the only one in Asia) in 2012, and passed a national law on domestic work, the Kasambahay Law,

in 2013. The phase of fast policy change that ended with the coming into power of President Duterte in 2016 was led by an ad hoc tripartite institution created in 2009: the Domestic Work Technical Working Group (TWG). The TWG, initially invited by the ILO Regional Office, includes state representatives, employers' organisations and workers' organisations – among which were unions but also some NGOs and religious organisations working on anti-trafficking, child labour and migrants' rights. However, according to our interviewees, the issue of domestic work was not widely discussed by feminists in those years (Hega et al, 2017) and the TWG itself was not particularly gender-sensitive. Instead, individual women's rights activists have been pivotal in the field, in particular, Rosalinda Dimapilis-Baldoz, Secretary of the Labour Office in the years 2010–16, as well as activists working as part of labour organisations such as Labour Education and Research Network (LEARN) and Sentro – which supported the creation of the domestic workers' organisation United in 2012 – and in the Workers in the Informal Sector Council of the Anti-Poverty Commission, part of WIEGO.

In Colombia, the ratification of C189 in 2012 was accompanied by domestic workers' campaign for the right to a 13th-month payment, which was achieved with the approval of the *Ley de Prima* in 2016. The campaign was promoted by a coalition composed of the Afro-Colombian domestic workers' organisation Unión de Trabajadoras Afrocolombianas del Servicio Doméstico (UTRASD), the local non-profit organisations Escuela Nacional Sindical and Bien Humano Foundation, and other actors involved in the nationwide feminist platform for the care economy (Mesa Intersectorial de Economía del Cuidado). Among them are two feminist congresswomen from the Green Party, Ángela María Robledo and Angélica Lozano. As we have shown in previous work (Marchetti and Cherubini, 2019; Cherubini et al, 2020), this coalition can be seen as exemplary of a possible convergence between domestic workers and feminists; notably, it entails the extension of the original scope of the care economy to include paid labour. Today, domestic workers appear to have many supporters among feminist actors in a setting where feminist ideals have made their way into trade unions, NGOs, political parties, academia and the pacifist movement.

In Spain too we found significant interest in the issue of domestic work, with many migrants', women's and domestic workers' groups mobilised for legislative improvements and for the ratification of C189 (Monteros Obelar, 2019). In the late 2000s and the 2010s, such convergence became evident in the work of the migrant domestic workers' organisations created in different parts of the country (such as Servicio Doméstico Activo (SEDOAC), Territorio Doméstico, Nosotras, Sindicato Autónomo de Trabajadoras de Hogar y del Cuidado (SINDIHOGAR) and through national networks such as the National Platform of Domestic Workers' Associations and the Turin Group. In 2011, more comprehensive legislation for the category was introduced, yet it fails to equate domestic workers with other workers. However, with the end of the left-wing governments led by Jose Luis Rodríguez Zapatero (2004–11) and the worsening of the economic crisis, domestic workers' rights have faded from the institutional agenda and C189 has not yet been ratified. Feminist actors are variously involved in this process, from academia to political parties (in particular, the left-wing party Podemos), trade unions and grass-roots groups, as well as in connection with the migrants' rights movement. Among them is Tania González

Peñas, a feminist politician (of Podemos), who (together with Konstadinka Kuneva) promoted the ‘Resolution on domestic workers and carers in the EU’ in 2015.

India saw a high mobilisation around domestic workers in the years under study, and the introduction of some legislation protecting domestic workers’ rights in some states in recent years. At the national level, while trade unions and NGOs successfully lobbied India to vote in favour of C189 in Geneva in 2011, the government has still not ratified the convention, nor has it accepted the proposals for a federal law on domestic work drafted by the Platform for Domestic Workers’ Rights (PDWR). The PDWR is a very large national coalition made up of domestic workers’ organisations such as the National Domestic Workers’ Movement (NDWM) and Nirmala Nikatan, as well as informal labour unions, women’s organisations for development, groups fighting for the rights of minority (low-caste and untouchable) groups and religious groups, such as Adivasi Jeevan Vikas Samatha. Feminist standpoints are well represented, in particular, by organisations such as the Self Employed Women’s Association (SEWA), a prominent trade union for women workers in the informal sector. Moreover, our participants testified to the role played by other women’s rights NGOs, in particular, Stree Jagriti in Bangalore and Jagori in Delhi. Also important are the voices of organisations fighting against trafficking, such as Shakti Vahini.

The question of domestic workers’ rights in Taiwan is embedded in wider policies on foreign workers’ recruitment for temporary work in factories and construction, and, since 1992, domestic work. Since then, Taiwan has increasingly relied on migrant caregivers for the needs of its rapidly ageing population. However, while other migrant workers have been protected by the Labour Standard Act since 2008, domestic workers, both migrants and Taiwan nationals, have been explicitly excluded from it. The serious violations of migrant caregivers’ fundamental rights have been denounced by labour and migrants’ rights organisations, such as the Serve the People Association and the Taiwan International Workers’ Association (TIWA). TIWA also led the creation of the larger network Migrant Empowerment Network Taiwan, which brings together human rights and religious groups, and already in 2013 formulated the Household Service Act to protect both Taiwanese and migrant caregivers, a proposal that has not yet been taken up by the government (Chien, 2018). Our informants reported that in this process, the engagement of the feminist NGO Awakening Foundation has been central. It is visibly engaged on the issue of care needs, with particular reference to long-term care provision for the elderly. Awakening Foundation had been stressing the importance of women’s emancipation from family care duties ascribed to them in Confucianist culture.

The situation looks quite different in the other destination countries for migrant domestic workers of our study, Italy and Germany, where mobilisations on domestic workers’ rights have been low in the decade under study, even though, as with Taiwan, these are ageing societies where households face care needs by privately employing migrant caregivers. During the 1970s, however, Italy and Germany were especially involved in the international Wages for Housework campaign which argued for the valorisation of unpaid reproductive labour (Toupin, 2014; Picchio and Pincelli, 2019; Busi, 2020). The emphasis on care issues re-emerged in both countries in the context of the widening debates on women’s issues thanks to the Ni una menos and #MeToo movements against gender-based violence. According to Busi (2020), this emphasis on care may represent a favourable frame towards an alliance between feminist and domestic workers’ movements. In Germany, two remarkable initiatives have been

the Care Manifesto, started in 2014, and the Equal Care Day initiative, launched in 2016, both calling for a global politics of care justice and equal distribution of care commitments between men and women.

To summarise, we observe a large variety of positions taken by feminist and women's rights actors, both collective and individual, in the strategic action field of domestic workers' rights across our countries for the period 2008–18. In most countries, we find that a crucial role in the domestic workers' cause was played by individual women bringing women's rights perspectives to their engagement as politicians, NGO activists, public officials, lawyers and so on. In particular, some of those policymakers – such as Rosalinda Dimapilis-Baldoz in the Philippines and Benedita Da Silva in Brazil – had been domestic workers in their youth and, overcoming the stigma attached to this job, were able to publicly speak about their experience. At the collective level, only in the context of Brazil, India, Spain and Taiwan have feminist and women's rights organisations concretely engaged in domestic workers' issues in the decade under study. It is worth noting that these are countries that have all experienced a large dynamism at the civil society level on the issue of domestic workers, involving important alliances with anti-racist and migrants' rights movements in Brazil, Spain and Taiwan, and with workers' mobilisations in India. Moreover, in Brazil, India and Spain, domestic workers have a long history of organising dating back to the 1930s. In spite of the ambivalences in the support that women's rights and feminist organisations give to domestic workers' rights activists, we found that, in many contexts, domestic workers' rights activists frame their struggles by echoing some of the classic feminist discourses, in particular, around anti-capitalist critiques of inequality.

5. Reframing the valorisation of reproductive labour

When analysing the frames mobilised in the domestic workers' rights field across our nine countries, we found that there is a recurrent connection made between the necessity to improve domestic workers' conditions and the importance of valorising reproductive labour more generally. Whether explicitly acknowledging the feminist origin of these ideas or not, domestic workers talk about how societies and nations need to recognise the value of the work that is done inside the home and within the family, mostly by women. They discuss the unequal distribution of reproductive labour between men and women, and the consequence of this inequality for their jobs as commodified forms of reproductive labour (Folbre, 2001; Boris and Parreñas, 2010). In other words, as they claim the right to contracts, better salaries and labour protection for themselves, they often also speak about the value of the unpaid forms of domestic work, and they challenge the general undervaluing of all tasks connected with caregiving and housekeeping (Dalla Costa and James, 1975; Federici, 1975; Delphy, 1984; Pateman, 1988; Picchio, 1992; Folbre, 2001). In the past, many feminists have organised campaigns asking for recognition of the value of these activities, not only in social terms, but also by acknowledging the economic contribution that they bring to society – and, in turn, the way they are exploited under patriarchal and capitalist economies. Tasks performed by women inside their households have been emphasised as work in the true sense of the word, which must be valued just like any other work (Sarti et al, 2018).

Today, expanding on this classic feminist frame, domestic workers' activists promote a general revalorisation of domestic tasks, both paid and unpaid, which follows from acknowledging the social meaning of this work and its contribution to the national economy. For example, in the context of the C189 process, they demand that domestic work be recognised as work 'like any other work', in terms of social and economic value, and labour rights and protections, but simultaneously as 'work like no other', in relation to its essential and irreplaceable character, and its contribution to the well-being of people, families, societies and national economies (Blackett, 2019). Remarkably, as they draw on the classic feminist argument of the valorisation of reproductive labour, they modify and expand it to include their experiences of discrimination and exploitation as remunerated and unremunerated workers, as women and as members of low classes or castes, and minority ethnic and racial groups.

Interestingly, these ways of reframing the feminist discourse of the valorisation of reproductive labour appear more clearly in some of the nine countries in our study, in particular, Brazil, Ecuador, Colombia, India and the Philippines. These are countries where the labour force is overwhelmingly constituted of national women from lower classes or castes and racialised, working almost completely in the informal labour sector and for employers who belong to markedly hierarchically superior groups.

In the context of Ecuador, for instance, Lourdes Albán, a member of the domestic workers' organisation ATRH, builds upon the feminist discourse on the care economy to explain the success of their campaign for the ratification of C189. She portrays domestic workers as essential to the well-being and support of both their own families and the families of others, that is, as a cornerstone of society, working in others' households. In her words:

'We made them [the politicians] see that we support the country, that we are also part of the economy of the country, part of the economy of the families of Ecuador. In the same way, we want the country to help us get ahead with our families that we are feeding [...]. And that is how we achieved unanimous ratification in the National Assembly. (Lourdes Albán, ATRH, Ecuador)

In a similar vein, Himaya Montenegro, a domestic worker and leader of United in the Philippines, argues that the pride of paid domestic workers as workers should derive from considering the contribution they make to the well-being of the middle class:

'It is difficult to compare [to other work sectors] because, until now, although domestic work is recognised as work, we still feel the very low regard for us paid domestic workers. What we are doing to raise our self-esteem is to tell each other to be proud of what we do, that domestic work is a dignified job. We tell other paid domestic workers to remember that we are the force behind the good income that the employers have because without us, they will worry about who will look after their houses, their children, their properties.' (Himaya Montenegro, United, Philippines)

Interestingly, while talking about the dignity of domestic work, Himaya Montenegro implicitly talks about women delegating unpaid domestic work to paid domestic workers, therefore introducing the issue of class difference between women.

An even stronger emphasis on the economic side of the valorisation of domestic work is put forward by Claribed Palacios García, part of the domestic workers' union UTRASD in Colombia, who speaks about the importance of according domestic workers' proper payment and treatment: "Since I am doing my job right, I demand to be paid and be treated with dignity. Domestic work is not a favour. Domestic work – as Convention 189 says – is work" (Claribed Palacios García, UTRASD, Colombia). In a different context, Sister Lissy Joseph, a spokesperson for the NDWM, the largest platform for domestic workers' rights in India, emphasises how both gender and caste are the principles behind the devaluation of reproductive labour:

'Mainly housewives are the employers. Their own lack of dignity is also playing on the life of other women workers. And all sorts of myths are there. [For example,] that certain classes of communities are coming [to Delhi] and certain types of work, cleaning and dusting, have to be done by the lower castes. You know, all this discrimination is also there. Workers not having dignity.' (Lissy Joseph, NDWO, India)

It is important to notice how in this narrative, the lack of recognition of women's reproductive work is expressed in terms of lack of dignity – a form of devaluation that affects not only the work, but the whole person, and, in fact, entire groups of people. She also refers to the cultural prescriptions about the distribution of different cleaning tasks between different caste groups. This is indeed the case in India, where the 'culture of servitude' described by Raka Ray and Seemin Qayum (2009) is apparent in a demeaning representation of domestic workers as 'others within', separated from the rest of society due to their association with stigmatised bodily functions and care needs.

These arguments constitute a challenge to gender-based assumptions that do not allow for seeing domestic workers as 'real workers' because their activity is considered an extension of family duties, based on the natural disposition to care attributed to women in general. With a different nuance, another argument is used by Sandra Muñoz, from Escuela Nacional Sindical (ENS), one of the non-profit organisations playing a key role in supporting domestic workers' organising in Colombia, when talking about the mounting of actions towards the ratification of C189:

'They [domestic workers] have begun to carry out a lot of actions and complaints that put Colombia in the hurricane as a country that has a social debt with the issue of gender, with some women, with domestic work. An issue that hurts everyone: it hurts the analysts, it hurts the congressman, the president. It hurts everyone because everybody has domestic workers.' (Sandra Muñoz, ENS, Colombia)

The need to recognise the social value of care and domestic work is here expressed in terms of debt: personal debt towards the individual domestic worker exploited in the houses of parliamentarians; but also a national debt towards the population that has been historically most exploited in the country. Notably, the language of indebtedness also reflects a postcolonial way of thinking that often represents injustice as an illegitimate appropriation of land, labour and resources from one class by another, and demands the reparation of past mistreatments. Here, we see

how a class-based perspective intersects with gendered and racialised elements; in a feminist intersectional perspective, Sandra Muñoz touches on the question of the racial division of reproductive labour (Nakano Glenn, 2002), which speaks of the unequal distribution of this work between women.

Another example of this argument is presented by Maria Betânia Ávila, founder of SOS Corpo, a Brazilian feminist organisation that has played a crucial role of advocacy for domestic workers' rights in the country, when she says: "Domestic work is considered a woman's job, that men take advantage of but simultaneously neglect. Within the relationship of paid domestic work, it is the women employers who enact the same neglect towards other women as working subjects" (Maria Betânia Ávila, SOS Corpo, Brazil). What we see at play is the use and transformation of a classic feminist frame in a way that extends it to a class- and race-blind formulation that only sees gender as a line of division of reproductive labour to include class, race, caste, migration, citizenship and postcolonial critiques.

6. Reframing the transnational commodification of care

Our analysis of the narratives used in the field of domestic workers' rights indicates that there is another classic feminist frame that is often mobilised to promote domestic workers' rights, connected and yet distinct from the valorisation of reproductive labour. This has to do with feminist critiques of the transnational commodification of care and the exploitation of migrant domestic workers (Sarti, 2007; Boris and Parreñas, 2010; Triandafyllidou, 2013; Romero, 2018). These analyses have become more relevant during the current crisis because they simultaneously refer to two kinds of deficit: a deficit in democracy and a deficit in care (Tronto, 2013). This frame is particularly present in the countries of our study that are international destinations for nannies and elderly caregivers: Italy, Spain, Germany and Taiwan. Our key informants testify to the importance of speaking about domestic workers' rights with reference to the expansion of care needs, and to the absence of the state while women enter the labour market.

In these contexts, the way activists talk about domestic workers' rights is affected by major trends in global mobility and migration. In our interviewees' perspective, the need to import foreign workers into this sector is linked to the care crisis and the failure of welfare systems to support an ageing society (Shire, 2015; Williams, 2018). In so doing, as they frame their struggle within larger social issues, using feminist critical tools, our key informants show, in this case as well, an original capacity to expand the feminist critiques of the transnational commodification of care by putting at the centre the lack of rights of migrant domestic workers – an argument that is not necessarily included in the discourse on the care crisis.

It is interesting along this line to read a section of the interview with Su-Xiang Chen, a member of TIWA, which has been a key player in the promotion of domestic workers' and other migrants' rights in Taiwan. Interestingly, she connects the issue of migrants' rights to the issue of the care crisis in the country, and even goes as far as saying that this crisis is the main reason why the exploitation of migrant domestic workers persists:

- Q: 'Do you think the labour conditions of foreign workers will be affected by the labour conditions of local workers?'
- A: 'That may be true only for the factory workers, not for the foreign domestic workers. The labour conditions of foreign domestic workers are not related to

any other kinds of workers. But their labour conditions are related to the family structure in Taiwan. If their wages rise or they have one day a week off, the cost also rises. As I said, the families who use foreign domestic workers are not all rich families, some of them struggle for a living.'

Q: 'So, you think the point of their labour conditions is not the awakening of labour rights?'

A: 'No. The point is the long-term care policy.' (Su-Xiang Chen, TIWA, Taiwan)

In Germany, Bianca Kühl works at the trade union confederation DGB (Deutscher Gewerkschaftsbund) in Berlin. Kühl, who identifies as a feminist, reports a recurring concern:

'Regarding the question of eldercare, it's basically inhumane. Nobody can be there for somebody else 24 hours, stand-by time at night, no. It is a system which is not working. But it is so normal in Germany that granny shouldn't go to a care facility, she needs to stay at home, but we cannot handle the situation either, so we get Eastern European women who leave their families behind. This cannot be the goal.' (Bianca Kühl, DGB-Berlin, Germany)

The 'inhumane' conditions to which migrant domestic workers are exposed are seen as a side effect of a wider crisis: the collapse of public welfare and, simultaneously, of the traditional structures for providing care in families.

The question of state institutions shirking their responsibility is effectively described by another trade unionist, Luciana Mastrocola from FILCAMS-CGIL (Federazione Italiana Lavoratori Commercio, Turismo e Servizi - Confederazione Generale Italiana del Lavoro), a trade union representing both domestic workers and workers in services, commerce and tourism. She says that addressing the care crisis by leaving it in the hands of households should not mean a divestment of responsibility on the part of the state in protecting these (migrant) workers:

'Families are handling something [care for the ageing] of which the state should be in charge. The fact that this care is delegated to another person [the migrant worker] has allowed the state to avoid taking responsibility for that, to acknowledge something like "I should be the one in charge."' (Luciana Mastrocola, FILCAMS-CGIL, Italy)

A similar tension in relation to migration policies is described by Ana Carolina Espinoza, from the domestic workers' union Servicio Doméstico Activo (SEDOAC), herself a migrant domestic worker based in Madrid:

'We must recognise the double standard of the economy of developed countries and of migration politics above all. Because, on the one hand, they want to put a stop so that not all migrants can enter, that not all foreigners can enter, but, on the other hand, I let some of them enter in order to exploit them and I take years before giving them rights.' (Ana Carolina Espinoza, SEDOAC, Spain)

At this level, discourses about migrants' rights and general criticism of the gender bias in the organisation of care are intricately connected. This often requires a changing awareness of the importance not only of this job in instrumental terms (to 'solve' the care crisis), but also of a general reform of gender- and race-based inequalities in society. The hypocrisy of states that face the care crisis by relying on a migrant workforce denied full rights recalls the argument made by Bridget Anderson (2014) about the contrast between the care deficit and nationalist tendencies to block the arrival of new migrants. In fact, it is on the terrain of migration policies that most claims for migrant domestic workers' rights are played out. Especially in Italy, Germany, Spain and Taiwan, domestic workers' conditions would improve as an effect of a liberalisation of migration permits and if they were given more rights regarding their residency status independent of the will of their employers. Here, we see at play the negotiation of the feminist frame in ways that bring migrants' rights to the awareness of the global care crisis: while recognising the crisis in care, this process builds on the experience of migrant women's exploitation in the global care market.

7. Conclusion

We started this analysis by noticing how the present wave of women's rights mobilisations shows a distinct capacity to involve actors that are not part of the feminist movement. However, the case of domestic workers tells a different story, suggesting that a lot of work remains to be done to bridge the current gap between feminist and domestic workers' mobilisations. Exploring the field of domestic workers' rights in nine countries between 2008 and 2018, we have found that feminist and women's rights organisations often remained what Fligstein and McAdam (2012) would call 'marginal' in the field. Exceptions are represented by a few important allies, such as: SEWA in India; Criola, Themis and SOS Corpo in Brazil; the Mesa Intersectorial de Economía del Cuidado in Colombia; and the Awakening Foundation in Taiwan. In Spain, new groups (such as Territorio Doméstico, SEDOAC and SINDIHOGAR) have been created from the union of domestic workers' rights and migrant women's rights issues.

Notably, we found that activists in the field of domestic workers' rights appear to draw upon classic feminist discourses. Indeed, activists recurrently speak of the rights of paid domestic workers within a broader view on the lack of valorisation and unequal distribution of reproductive labour, both paid and unpaid. This is especially the case in Brazil, Ecuador, Colombia, India and the Philippines, countries where the labour force is overwhelmingly constituted by national women from lower classes or castes and racialised. Moreover, activists often draw upon contemporary feminist critiques of the transnational commodification of care, especially in countries with an ageing population, such as Italy, Germany, Spain and Taiwan. Crucially, they do so by negotiating and elaborating on such discourses in very interesting ways, and they typically complicate the gender-only analytical dimension that some feminist arguments may promote. By extending and forcing the classic frame of gendered inequality in domestic work by putting the experience of (poorly) paid domestic work at the centre, domestic workers' rights activists provide a broader view on the unequal distribution of reproductive labour, which also speaks of inequalities of class, race, ethnicity, caste, migration and citizenship. Moreover, by extending the classic frame on the crisis of the welfare state, our key informants develop a frame that focuses

on the exploitation of migrant domestic workers by showing how these migrants pay the price of welfare in industrialised countries. In conclusion, we suggest that in order to bridge the gap with other women's movements, feminist and women's rights groups may listen to their discursive creative potentials, and continue building alliances around issues of social reproduction addressed in an intersectional perspective, which has characterised the recent trends of feminist mobilisations.

Note

¹ Previously International Domestic Workers Network (IDWN).

² European Research Council Starting Grant Project 'DomEQUAL: A Global Approach to Paid Domestic Work and Social Inequalities'. When necessary, the writing of this article can be attributed in the following way: Garofalo Geymonat, sections 5 and 6; Cherubini, sections 3 and 4; and Marchetti, sections 1, 2 and 7.

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Conflict of interest

The authors declare that there is no conflict of interest.

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