



## Mapping domestic workers' organizing globally

### *Cartografía de la organización de las trabajadoras domésticas a nivel mundial*

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#### ABSTRACT

Domestic workers face challenges for organizing, e.g. decentralization of the workforce, nature of the employment relationship. This article analyses, based on a multiple country-comparison, how domestic workers organize despite constrictions. We identify three forms of organizing: the trade union model and the association model (Shireen Ally). We propose, though, an additional third model, the 'hybrid type': domestic workers organize 'amongst themselves' in associations and at the same time these associations are linked to or integrated into trade unions, which provides representation, services and contact with other workers. Related to this finding, we see a trend of an 'emerging trade unionism'. Which means that we tend to find more trade union-related forms of organizing than a decade ago. One explanatory factor is the "governance struggle" of winning the International Labour Organization's Convention "Decent Work for Domestic Workers" in 2011, which led to an increased collaboration and trust-building between organized domestic workers and trade unions.

**Keywords:** *domestic work, trade unions, labour rights, migration, comparison.*

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## RESUMEN

Este artículo contiene una introducción al número monográfico de *Atlánticas. Revista Internacional de Estudios Feministas* en torno a los estudios de cuidados que lleva por título “Los cuidados en la encrucijada del cambio social”. En primer lugar, se presenta una contextualización en la que se resalta la relevancia de los cuidados para los estudios feministas y de género. A continuación, se emprende una revisión y síntesis de las principales temáticas que ha alumbrado el concepto de cuidados, desde la ciudadanía y el Estado de Bienestar, hasta las formas de organización social y reparto de los trabajos o las políticas públicas en materia de cuidados; pasando por cuestiones emergentes tales como la participación de los hombres en estos trabajos, la relación entre urbanismo y cuidados o las implicaciones de la tecnología para los cuidados. Por último, se indica y contextualiza la relevancia y originalidad de las contribuciones contenidas en el monográfico.

**Palabras clave:** *trabajo doméstico, sindicatos, derechos laborales, migración, comparación.*

## RESUMO

As traballadoras domésticas enfrontan numerosos problemas para poder organizarse, como a descentralización da poboación activa ou a natureza da súa relación laboral. Este artigo analiza, a partir da comparación de varios países, como se organizan as traballadoras do fogar pese a estas limitacións. Identificamos tres formas organizativas: o modelo sindical e o modelo asociativo (Shireen Ally). Propoñemos un terceiro modelo, o “tipo híbrido”, no que as traballadoras domésticas se organizan “entre elas” en asociacións e, ao mesmo tempo, estas asociacións están vinculadas ou integradas en sindicatos, o que lles proporciona representación, servizos e contacto con outros/as traballadores/as. En relación con este achado, observamos tamén unha tendencia cara un “sindicalismo emerxente”; isto é, atopamos formas organizativas máis relacionadas cos sindicatos que hai unha década. Un factor explicativo reside na “loita pola gobernanza” tras da vitoria no Congreso da Organización Internacional do Traballo en 2011 sobre “Traballo Decente para as Traballadoras Domésticas”, que implicou unha maior colaboración e confianza entre as traballadoras do fogar organizadas e os sindicatos.

**Palabras clave:** *traballo doméstico, sindicatos, dereitos laborais, migración, comparación.*

## 1. INTRODUCTION

“Coordinating Africa as a region was very difficult for me because I didn’t know what was going on in any other African country besides Tanzania. I didn’t know who to reach out to, the total number of domestic workers in Africa, or the challenges faced in each country. Nevertheless, I felt confident because ... of the visible commitment of colleagues from Latin America, Asia, South Africa, and the USA...” (Kanyoka, 2017, p. 72). This quote by the African coordinator of the *International Domestic Workers Federation* (IDWF), Vicky Kanyoka, addresses key aspects we would like to make in this contribution: First, the landscape of domestic workers’ organizing is a dynamic field. In the last decade the modes, the pace and volume of organizing domestic workers has increased significantly. Second, Kanyoka voices the great gap of knowledge at that time around 2009 when the coordination of activities began. We will show that the negotiations and mobilizations around the ILO Convention No. 189, Decent Work for Domestic Workers, as a “governance struggle” (McCallum, 2013, p. 11) worked as a driver behind dynamics that already existed at local and national levels in various regions of the world. The quote thirdly also indicates that the organizing and the coordination among organized domestic workers was developed while doing it – no blueprint existed, although the protagonists learned from unsuccessful and successful processes elsewhere. It is not any longer a question whether domestic workers can organize, but how. To identify patterns of organizing is the key objective of this article.

Drawing data from more than a dozen countries, we argue that there is a trend towards a type of organizing that is a hybrid between the often juxtaposed ideal-types of the ‘union model’ and the ‘associational model’ (Ally, 2005). This hybrid model resembles what Stephanie Ross subsumes under “social unionism” (Ross, 2007), which means a variety of types of organizing workers in and around unions, taking labour struggles and labour rights as important issues, but also taking into consideration the workers’ needs beyond the workplace. Such types of organizing are often discussed in the context of trade union renewal and the dire need for most unions to find answers to decline in union density and membership. However, in the case of domestic workers’

organizing, such organizing models develop for a variety of other reasons. As we will show, domestic workers are often excluded from labour laws that guarantee them the right to organize. Even when they enjoy the right to freedom of association in law, there remain a series of practical barriers to organizing in this sector. This explains why the membership of IDWF shows a colorful mix of unions of exclusively domestic workers, self-help associations, domestic workers sections of general unions, and networks or coalitions that comprise a range of actors. Such an organizational variety, with a strong trend towards what we call 'hybrids', is therefore indicative of the current landscape of organized domestic workers.

In the remainder of the article, we will first introduce the topic of domestic work and the challenges of organizing domestic workers. We then elaborate our conceptual approach, the power resources approach, which we chose because it allows to identify the different types of resources and abilities to organize. After having shown that domestic workers indeed manage to gain associational power, the forms of organizing are identified – associations, unions and 'hybrids' – and compared. In a final section we revisit the power resources approach and discuss key characteristics and implications of domestic workers organizing.

## 2. PERCEPTION OF THE SECTOR: DOMESTIC WORKERS AS UNORGANIZABLE

When we speak of domestic workers, we need to clarify whom we are talking about in two respects: First, in the current care work debate and its long feminist history, there is a tendency of an inclusive notion of care – ranging from caring for one's family to nurses in hospitals. While we analytically subscribe to this inclusive understanding of the verb 'to care', we follow a more narrow understanding of domestic workers when we look at their modes of organizing. We apply the definition of the International Labor Organization that states: "(a) the term *domestic work* means work performed in or for a household or households; (b) the term *domestic worker* means any person engaged in domestic work within an employment relationship: on an occupational basis" (ILO, 2011, article 1). In our exploration of domestic

workers' organizing, we therefore do not include care workers employed in hospitals or elderly care homes, because they fall under different legal regimes and are represented by public or private sector unions. A second conceptual clarification concerns the transnational dimension of care arrangements. This has gained great prominence in current feminist scholarship (i.e. through the concept of global care chains, e.g. Isaksen et al. 2008). In some countries most domestic workers are migrants, in others' most are nationals, or the sector is a mixed and stratified one with hierarchies along lines of migration status or ethnicity. Our research covers migrants and nationals, considering nationality an important marker for the degree of rights a worker has, the impact of racism or stereotyping, and the role of national or ethnic communities for organizing.

In the literature, domestic workers' organizing is very much framed as an "exception". Unionization rates among domestic workers are undoubtedly low. Along with precarious migrant workers they are often considered to be "unorganizable" (e.g. Ford, 2004; Smith, 2000) and the sector to be "impermeable to unionisation" (ICFTU, 2002, p. 2). The reasons seen for domestic workers being "unorganizable" lie mostly in the decentralized structure of the sector, the interpersonal nature of their work, the low worker to employer ratio, and the isolation of the workplace. Domestic work is also a largely informal sector in most countries. These characteristics are associated with an ideological dimension that considers domestic workers "part of the family" (Anderson, 2000), and not work performed within an employment relationship.

Another reason given in the literature and that has been empirically grounded by an ILO law and practice report (ILO, 2009) is the exclusion of domestic workers, either wholly or partially, from labor law: Global estimates collected by the ILO indicate that about 50% of domestic workers worldwide do not benefit from protections equivalent to those enjoyed by workers generally (ILO, 2011). The reasons given for this exclusion are by now well known: domestic work is not seen as real work, and it is not seen as real work in part because it is associated with a woman's traditional role in the home. And yet, domestic work plays a key role in the care economy as a form of reproductive labor. Beyond these structural barriers, "ideological mystifications" (Ally, 2005, p. 1) of the

unorganizability of domestic workers are considered significant to “mitigate against domestics’ understanding of themselves as ‘workers’, and therefore unionisation” (ibid.).

The perception that domestic work is not real work has also been at the root of their exclusion from the growth and victories of the traditional labor movement. Organized labour for a long time opposed the unionization of women (Raaphorst, 1988). Craft unions did not see domestic work as skilled labor, and industrial unions did not see the home as a workplace, nor could they overcome the fragmentation of the workforce or meet the needs of women workers (Boris and Nadasen, 2008). However, what is often forgotten in the literature is that domestic workers indeed started organizing long ago – as early as the 19<sup>th</sup> century in Atlanta, Georgia, in Brazil and Chile in the 1930s – whether as trade unions or associations, and sometimes reaching great scale.

Organizing domestic workers necessitates fitting models and strategies. Recent research has illustrated the ways in which domestic work does not fit the traditional industrial relations model and that the powers mobilized differ from other sectors. The industrial relations model was “based on a direct employment relationship with a single employer, a high ratio of workers to employers, and the power of the workers to withhold their labor to compel employers to comply, the source of their bargaining power” (ILO, 2015, p. 1). Further, also employers need to be organized in order to negotiate with unions. This model worked for industrial unions to ensure compliance with a collective agreement.

Moreover, if traditional unions have organized for the purposes of bargaining with an employer, many have questioned with whom a union of domestic workers would hope to negotiate; indeed, in some cases domestic workers are hired directly by a household, but oftentimes, public or private organizations intermediate the employment relationship. In some cases, this has led to the conclusion of collective agreements directly with the state as employer, and in other cases to collective agreements with associations that represent the employers of domestic workers, be they individual households, private enterprises, or both.

In the wake of the ILO discussion with a view to adopting international standards on decent work for domestic workers in the 2000s, the question of domestic workers' organizing and unionizing has regained attention all over the world, because international labor standards are like toothless tigers if there is no pressure from politically influential organizations of workers and allies to implement them and monitor the effects. This begs the question, can domestic workers' organizations leverage the powers necessary to ensure the implementation of their own rights, and if so, what kind of organizational form best facilitates it?

### **3. CONCEPTUAL APPROACH: DOMESTIC WORKERS NEED TO MOBILIZE POWER RESOURCES**

The so called 'power resource' approach in labor studies (e.g. Wright, 2000; Silver, 2003; AK Strategic Unionism, 2013; Schmalz et al. 2018) offers a useful set of concepts to analyze the circumstances under which domestic workers can organize themselves and the strategies they use to do so. The approach goes beyond the traditional set of trade union powers. Traditional union strength was coming from "structural power", that is, the ability to disrupt the valorization of capital through labor unrest and strikes. Workers' interests were represented in trade unions and in workers' parties, when they were able to associate ("associational power"). Laws enshrining the right to form unions and to bargain collectively provided the necessary "institutional power". This set of powers can be considered the standard equipment of organized workers and trade unions.

Domestic workers lack structural power: The sector is highly disorganized both at the workplace level, and at the organizational level making a strike or other industrial collective action almost impossible to coordinate to the extent that it would be capable of disrupting the valorization of capital. Further, the dispersion and isolation of the workforce also make the organization of domestic workers a very labor intensive and slow process, as compared to the efficiency of organizing workers by the hundreds on a shop floor. These matters make domestic workers very weak in terms of structural and associational power.

Yet, the power approach recognizes not only these traditional modes of “power over”, but also “power to” (achieve other wins). The approach therefore provides a useful framework in which to describe and understand the potential of actual organizing strategies. Indeed, in the absence of domestic workers' power over their employers, strategies have proliferated to build their capacity to, *inter alia*, advocate for rights, and influence social norms and perceptions of domestic work. As such, for understanding domestic workers' organizing, the engagement with the relevance of what different authors call societal, social, discursive, moral, coalitional or advocacy power is crucial. These forms of power are not identical, but describe facets of what domestic workers can do to gain visibility, recognition and power.

Table 1: Levels of labor power (reproduced from: Schmalz et al., 2018, p. 119)

	<b>Structural power</b>	<b>Associational power</b>	<b>Institutional power</b>	<b>Societal power</b>
<b>Applied in the form of</b>	Disruption of the valorization of capital	Formation of workers' association	Referring to legally fixed rights	Interaction with other social actors
<b>At the level of the workplace</b>	Labour unrest  Changing jobs	Grassroots works groups, works council, shop-steward bodies	Works constitution	Coalitional and discursive power by their very nature transcend the boundaries between the levels
<b>At the industry-wide level</b>	Economic strikes	Trade unions	Collective bargaining autonomy	
<b>At the level of society</b>	Political strikes	Workers' parties	Constitution, law and legislation	

Schmalz et al. (2018, p. 122) consider as societal power “the latitudes for action arising from viable cooperation contexts with other social groups and organisations, and society's support for trade union demands.” It includes “the ability to assert hegemony, that is to say to generalise the political project ... within the prevailing power constellation so that society as a whole adopts it as



its own.” (ibid.). This reads not as a small task: convincing society as a whole to support domestic workers’ rights. Means to do so are by discursive and moral interventions (‘winning the hearts’) and by searching for allies. Steven Jenkins’ differentiation between advocacy power and social power is useful for our case of domestic workers: *advocacy power* is the ability of a group to influence policy or correct injustices on the basis of their symbolic value as a group; *social power* on the other hand is the ability of a group to force changes and to coerce decision-makers into making the changes they seek (Jenkins, 2002, p. 62). He argues that workers’ organizations in which the source of social power is not yet clear have a tendency to focus on advocacy campaigns. In Jenkins view, social power is a form of power that can and must exist outside and within the organization, and contains qualitative and quantitative aspects, the development of which are crucial to assessing the power of a group: “the qualitative level refers to the development of the membership in their individual capacities and in their ability to function democratically and assert their interests. The quantitative aspect is the size and power of the membership as against the forces they are confronting” (Jenkins, 2002, p. 84). This implies that the structure of the organization and decision-making position of the workers, in this case domestic workers, has an essential bearing on the realization of domestic workers’ social power. In theory therefore, the more voice and control domestic workers have over their organizations and campaigns, and the larger their numbers, the closer they come to realizing their social power; or in Schmalz et al.’s Gramsci-inspired terminology, to strive for hegemony.

These forms of power have been associated with various organizational forms. For instance, in Jenkin’s view, trade unions have high quantitative capacity of exercising their power, but have low qualitative capacity for social power because they are hierarchal and do not focus enough on developing their membership. Putting to one side the debate whether or not this holds true for the trade union movement generically, Jenkins’ assertion may not hold true for domestic workers’ unions. The form of the organization does not necessarily dictate the level of social power of domestic workers. To date, domestic workers’ victories in many countries have been limited to policy reforms largely

based on advocacy power (Goldberg, 2014); however, the question of whether domestic workers would have the power to force changes, regardless of organizational form, remains a pending question. Building off of the work of Wright, Silver, Jenkins, the Jena school as well as Goldberg, we hope to shed light on this question by mapping domestic workers' organizations, and assessing them on the basis of three axes of power: the power of the organization to exist (associational power); to achieve policy change (advocacy power); and the power of domestic workers in decision-making and in expressing a unified voice in their organizing (the qualitative dimension of social power). It is our belief that this mapping and assessment will shed some initial light on the forms and functions of existing domestic workers' organizations, and their potential to effect change.

#### 4. DATA AND METHODOLOGY

This article draws on data on the organizing efforts of domestic workers in more than a dozen countries. The paper is not the result of a single project. It relies on a range of sources and country studies that are the result of the multi-year-long work of the authors in the field. Global Labour University (GLU) alumni and researchers from the International Center for Development and Decent Work (ICDD) conducted country and case studies that focus on the organization of domestic workers in Hong Kong, New York, Amsterdam/the Netherlands, Czech Republic, Brazil, Dominican Republic, Indonesia, Italy, Namibia, Nigeria, the Philippines, Tanzania and South Africa.<sup>1</sup> The case studies relied on a unified research design and included semi-structured interviews with key actors of domestic workers' organizations and trade unions, documentary analysis that document their activities (i.e. flyers, programs, press releases) and personal observations during meetings, marches and organizing

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drives. The case studies' design asked for information on the organizational structures, activities, campaigns, resources, outreach strategies and relationship of domestic workers to trade unions. We assembled the information in a matrix and compared the countries. The additional research and work-related collaboration on domestic workers' organizing by the authors of this article includes Kenya, Zambia, India, Argentina, Chile, Uruguay and several European countries. The major part of the research took place between 2009 and 2014, with updates until 2016. We took an inventory of the organizations' activities, demands and resources; the relationship between trade unions and domestic workers; strategies for success; and the demographic profile and legal status of domestic workers in the country. As far as the quality and type of data allowed, we also compared the cases.

We looked at organizations of domestic workers in each of these countries. All of them are membership-based, which means that we did not take those NGOs into consideration that are not composed of, or lead by domestic workers, but that rather help them or advocate on their behalf (such as Human Rights Watch). Some of the researched organizations have trade union status. Some have non-profit or NGO status. Others have no legal status, but operate as informal associations.

## **5. DOMESTIC WORKERS' ORGANIZING IN INTERNATIONAL COMPARISON**

In the following, we elaborate on two issues. First, we look at strategies to overcome the isolation of the workplace problem. This is a precondition for domestic worker organizing, hence for their associational power. As we will show, not all, but significant numbers of domestic workers managed to mobilize at least sufficient resources to collectively organize. The part that follows therefore identifies three modes of organizing: an associational model, a union model and a hybrid model, and tries to characterize and explain the dominant mode in the different countries.

### **5.1. Strategies to overcome isolation of workplace**

Rhee and Zabin talk of a specific “geography of care labor organizing” (Rhee and Zabin, 2009, p. 971) that differs from organizing other workers. Domestic workers work in private households that can be considered “atomized worksites” (ibid.). Overcoming the isolation of the workplace is not only a logistical challenge, but also a challenge to union practices and identity. In many European and North American countries, the traditional unions focused on shop floor organizing in large-scale manufacturing sectors. It was considered a source of union strength and solidarity that the workers met on a daily basis. This is definitively not the case in the sector of domestic work. However, the challenge of organizing dispersed workers is not unique to domestic workers as in recent decades worksites in other sectors have also become smaller and spatially dispersed. A decentralization of the workforce means that organizing efforts must find other points around which to reach workers, and eventually bring them together.

Organizations have made use of traditional grassroots methods of organizing as well as of new communications technologies. In bringing workers together across race, nationality and immigration status, they also have helped to build a collective worker identity that is essential to organizing for labor rights and their implementation. These strategies allow domestic workers to build the qualitative aspects of their social power, i.e. the development of the membership in their individual capacities and in their ability to function democratically and assert their interests.

Among the case studies, the majority of the organizations of domestic workers, whether union or association, developed similar strategies targeting sites where domestic workers would congregate to overcome this decentralization. In nearly all countries, organizations reach out to domestic workers in public spaces. In Brazil, for example, the *Sindicato dos Trabalhadores Empregados Domésticos de Nova Iguaçu* distributes flyers with information on rights and the trade union contacts to domestic workers in churches, at bus stations, and at other public spaces. In the Netherlands the migrant self-organization *Otradelá* shows a strong community focus, reaching out to domestic workers in churches providing services for migrants and in neighborhoods where they live. Also, in Namibia, domestic workers' organizations go to churches to announce union

meetings. In the Dominican Republic, *Asociación de Trabajadoras del Hogar* (ATH) uses strategic public transport stops, and visits domestic workers' neighborhoods (on Sundays) to invite domestic workers to their meetings. Using these strategies, each of these organizations succeeded in forming organizations that count members in the hundreds and sometimes in the thousands.

In cities where domestic workers work in highly concentrated numbers in specific neighborhoods, organizations have also succeeded in doing outreach door to door. The most prominent example of this is the Kenyan KUDEIHA (*Kenya Union of Domestic, Hotels, Educational Institutions, Hospitals and Allied Workers*), which organized some 20,000 domestic workers by visiting gated communities in which domestic workers worked.

Another way of creating a site of aggregation is to create a space at which domestic workers know they can meet on a regular basis. In the United States for instance, members of *Domestic Workers United* (DWU) knew they could meet on the third Saturday of every month at the same place at the same time, in the fashion of a worker center. This provided a form of stability for a highly mobile workforce. In Argentina, the *Union Personal Auxiliar de Casa Particulares* (UPACP) established a school that trains and certifies domestic workers, which has attracted thousands of new members.

Finally, almost all organizations nowadays make use of (*new*) communication technology: in the Dominican Republic, ATH uses mailing lists; in Namibia the union made use of cell phones for campaigning, using language that was easy to read and understand. In Hong Kong, the *Federation of Asian Domestic Workers Union* (FADWU) offers telephone counseling to domestic workers who have problems on labor disputes, police cases, or immigration cases to overcome workplace isolation and limits on freedom of mobility. WhatsApp and Facebook groups exist in many countries, including spreading the word via Voicemail for those who are not literate or prefer this way of communication.

A low degree of traditional associational power is not a fate. However, organizing large numbers of domestic workers requires significant investment in terms of financial and personal resources. In the following section we have a

closer look at the existing organizational forms of those domestic worker organizations that facilitate the associational power and may be able to increase the societal power of domestic workers.

## **5.2. Three organizational modes: association, union and hybrid**

Legal and practical barriers to organizing have shaped a variety of forms of domestic workers' organizations. The characteristics of the two models distinguished by Shireen Ally – association model and union model – will be presented first and examples of typical representatives given. After that, we will present the results of joint discussions of the research group on how to put different countries into perspective regarding the predominant model of organizing domestic workers.

In a domestic workers' organizing landscape that can be typologized as "association model", a wide spectrum of associations, such as domestic workers' self-help groups, advocacy groups, migrant and faith-based community associations, organizes and mobilizes around the demands and needs of domestic workers. Before we go into detail on the cases, we should mention the overall trend that in particular migrant domestic workers tend to organize first in associations by nationality, ethnicity or language. This has been researched extensively (Jayaraman and Ness, 2005; Tait, 2005; Das Gupta, 2006; Milkman, 2006; Hondagneu-Sotelo and Riegos, 1997; Boris and Nadasen, 2008). In some countries, such as in most Gulf countries or the United States, domestic workers are not allowed to form trade unions or to become members of trade unions. In these countries, the organization necessarily follows the "association model".

The organizations covered in this study show a broad variety of activities across organizational forms, such as providing meeting spaces, campaigning, lobbying political decision-makers, organizing cultural and social events or offering capacity-building courses. In particular in countries where many of the domestic workers are migrants, in particular undocumented or with their visas sponsored by their employers, some specific issues need to be addressed and

services offered, such as providing safe-houses for run-away domestic workers, offering religious services, selling cheap phone cards, providing IT services, facilitating language courses or collaborating with the embassies of the countries of origin of domestic workers. The driving force and motivation of the activists is often the denunciation of the injustices of immigration regulations and of violence against women as well as the knowledge that nobody else would offer such services and activities for domestic workers. In this model, trade unions may play a role, however, not the most central one. Among the organizations observed, employment issues are by far not the only issues that are relevant in the “association model”.

An example for a region in which domestic workers’ organizing evolves almost exclusively within the “association model” is the province of Alberta in Canada (Roberts, 2011): Live-in caregivers are mostly immigrant women who have entered the country under a special temporary labour immigration scheme, the Live-in Caregiver Program (LCP). There is a web of organizations that includes community groups, employer/employee associations, academics and government institutions as well as other civil society organizations and trade unions. Since the majority of Canada's live-in caregivers are from the Philippines, it is no surprise that the *Filipino Society for Growth & Change* (FSGC) in Edmonton, a non-profit and charitable organization, has locally played a role in supporting live-in caregivers. It offers legal, financial, spiritual, and health support services, all free of charge. Another local ethnic specific organization is the *Multicultural Health Brokers Cooperative* (MHBC) that operates as a worker cooperative, but also supports for example pregnant live-in caregivers. Since the birth of the LCP program in 1992, the *Calgary Immigrant Women’s Association* (CIWA) has organized support groups for live-in caregivers on Sundays. CIWA has also been involved in advocacy work on behalf of live-in caregivers, such as lobbying the Alberta government to cover live-in caregivers under the provincial labor code and for improved workers' protection. Many of these organizations, and others that cannot be listed here, are immigrant (women’s) groups that have been operating already since decades and offer various forms of support and lobby for live-in caregivers. Trade unions are almost absent in this picture. A reason seems to be that because until live-in caregivers complete two years of service and are eligible for permanent residence in Canada, they

are not seen as an organizable workforce. There have been some gestures of solidarity for live-in caregivers from trade unions. For instance, the *Service Employees International Union (SEIU)* has acted as an ally with live-in caregivers. However, no real organizing drive has been carried out. Ally states that the “association model,” where it functions as a *substitute* for unionising, remains therefore problematic” (Ally, 2005, p. 6, italics in original). While the case of the province in Canada is representative for the association model, there are other cases in which trade unions and workers’ issues take a much more important role.

In the “union model”, domestic workers are “organised on the basis of their workers identities” (Ally, 2005, p. 7). An important characteristic of this model is that the organization is sustained primarily by membership fees. In this model, the key demand is that domestic workers have labor rights equal to those enjoyed by other workers. It follows that these organizations would work towards the objective of collective bargaining. From our case studies and additional empirical insights, domestic worker organizing in countries such as Brazil, South Africa, and Uruguay are most illustrative of the union model. In Brazil, domestic workers organized into unions first at the local level, then formed a national federation of domestic workers called the FENATRAD (*Federação Nacional das Trabalhadoras domésticas*). FENATRAD is in turn an affiliate of the national sectoral union of service workers, CONTRACS (*Confederação Nacional dos Trabalhadores no Comércio e Serviços*). CONTRACS is then affiliated to the umbrella union in the country, the CUT (*Central Única dos Trabalhadores*). Domestic worker members can hold elected positions across the entire structure.

The example of Brazil illustrates an advanced form of unionization, but it is important to note there can also be shifts from one to another model, often as a result of the difficulty in sustaining a union. In South Africa, many associations used to exist and then consolidated and transformed into SADSAWU (*South African Domestic Services and Allied Workers Union*), a fully-fledged union for domestic workers, that is affiliated to the national umbrella union, COSATU (*Congress of South African Trade Unions*). However, meeting the requirements to be a registered trade union is challenging, and SADSAWU has been frequently at risk of losing official trade union status. The challenge of sustainability is



sometimes addressed by having domestic workers join an existing union of other workers, or an all workers' union. For instance, in Namibia, domestic workers joined forces with the farm workers union as the *Namibia Domestic and Allied Workers Union* (NDAWU). Such efforts can be considered even moving towards a social movement unionism.

The following examples show how significant the organization of the sector, in particular concerning the role of the state, in facilitating more or less favorable conditions for a union-type of organizing is. The United States of America represents such an interesting case. In the state of California trade unions have already taken up the issue of careworkers' rights in the 1990s. In order to counter membership decline, unions started to organise the non-organised workers, including cleaners (the famous 'Justice for Janitors' campaign) and caretakers based in private homes (Delp and Quan, 2002). The trade union SEIU successfully unionized 74,000 homecare workers, even though they work isolated in private homes, are mostly low-wage immigrant workers and all have individual employers. This was the biggest organizing victory for the labor movement in the United States since the 1940s (Smith, 2000). This organizing victory was made possible because homecare work in the United States is partially subsidized by the government. This gave unions the possibility of organizing this sub-category of domestic workers essentially as public sector workers. Domestic workers whose labor is not partially subsidized by public funds on the other hand do not have the right to organize, and as such, the association model remains dominant in the United States. The contrast between the experience of the in-home care providers, and other domestic workers, illustrates the important role of the state as provider of in-home care services, and the organizing opportunities that ensue.

Indeed, in other countries such as France and Belgium, where domestic work is legally recognized as work, the cost of domestic work is subsidized or fiscally incentivized, sectorial bargaining is possible, and trade unions of domestic workers and organizations of employers exist, collective agreements have been concluded and have risen the level of protections for domestic workers (Heimeshoff and Schwenken 2013). Whether domestic workers indeed profit from these, however, is another story. It remains rare to find countries in which such an enabling framework for collective negotiation exists.

In general, it can be said that unions that engage in this sector acknowledge that there are differences between traditional trade union strategies and the way to organize domestic workers. These union activities indicate that in practice activities of domestic workers' trade unions and of domestic workers' associations are not necessarily very different.

We would like to propose a third type of domestic worker organizing, the "hybrid model": cases in which domestic workers organize themselves into small organizations (often nationality-based), and provide typically associational services. Yet, they are federated and affiliated to a peak union organization. From our case studies, Hong Kong, and the Netherlands may be typologized as such "hybrid model" cases. The transformation of several migrant domestic workers' groups into trade unions in the case of Hong Kong can be seen as an effort to gain political participation and as simultaneity of the associational to the union model. Also in the Netherlands, domestic workers do both: they self-organize as (migrant) domestic workers in associations, and also strongly cooperate with the trade union FNV Bondgenoten and are members of the same union with a negotiated representation in the union parliament. The continued existence of the associations is of utmost importance for the functioning of this hybrid model, because it allows domestic workers to speak with a unified voice, and ensure that some of their most pressing needs are met. When they are small, these associations require administrative and sometimes financial support from the peak unions to which they are affiliated. Often, a champion trade union organizer that sees the value of both models acts as a bridge builder between the two settings.

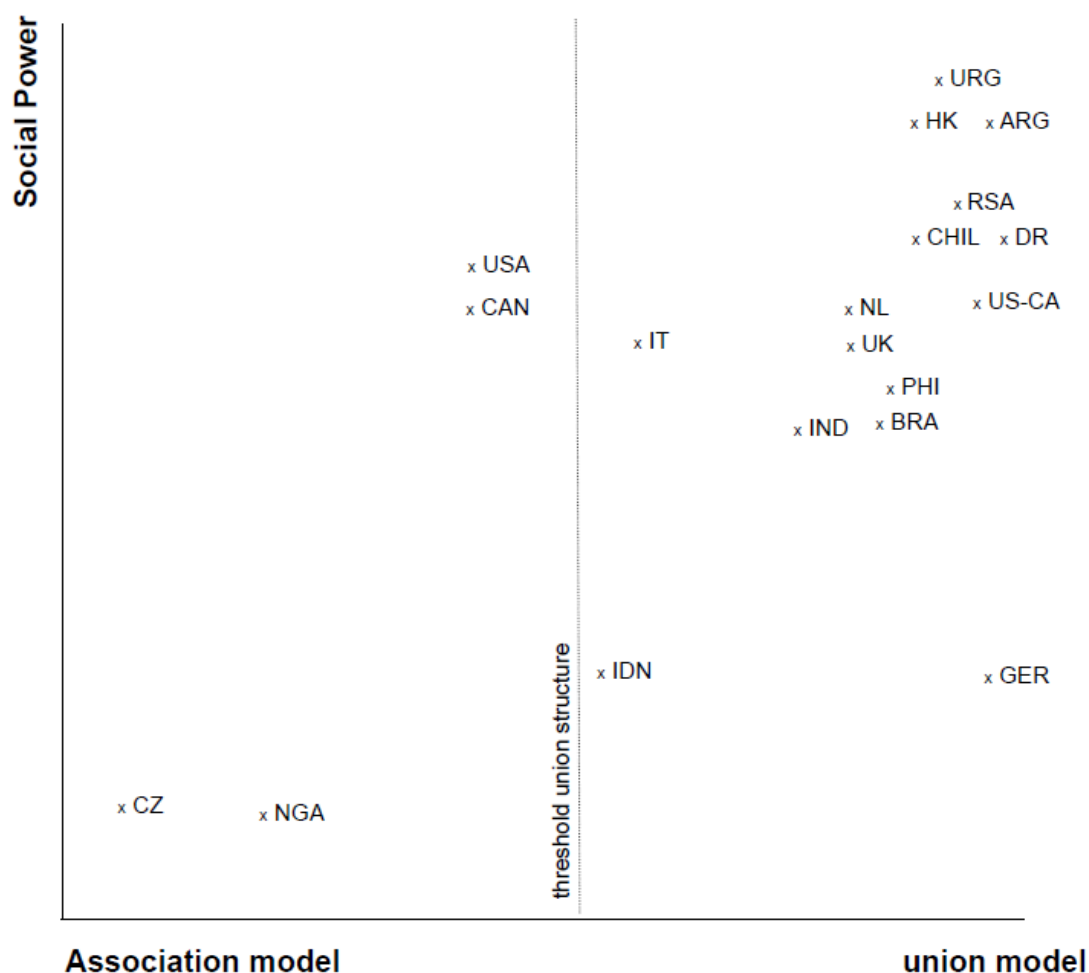
A global comparison shows that the "association model" is the dominant one in the field of domestic workers' organizing. However, in recent years, domestic workers have increasingly succeeded in forming or joining trade unions. This new dynamism goes to a huge extent back to the process towards the negotiation, ratification and implementation of the International Labour Organisation's convention "Decent Work for Domestic Workers" (2011). The process – or: "governance struggle" (McCallum, 2013) – has shown that trade unions can be strong allies for domestic workers, even in countries where there is not such a strong tradition of domestic worker unions. Further, the process shows that the framing as a worker rights issue can be powerful and allows a

move away from victim-based frames that have been promoted by many national and international actors, such as some of the huge, non-membership-based NGOs (Schwenken, 2017).

## 6. TOWARDS A GLOBAL MAPPING OF MODELS OF ORGANIZING

In the following, we propose a mapping of various countries. For the global mapping, Shireen Ally's associational versus trade union model (2005) was placed on a spectrum, and the case studies were mapped along two axes: whether they were unions or associations in law, and the nature of their strategies and objectives. The other axis represents the degree of social power domestic worker organizing has achieved. The countries are allocated according to the characteristics of organizing domestic workers, such as whether trade unions are the driving force or a varied spectrum of associations exists, whether the framing is primarily a labor related one or gears more towards women's rights or other issues, whether trade unions have an official trade union structure for the sector, etc. The third, 'hybrid' model can mostly be found in the upper right of the graph, where elements of both are entangled and the organizations have some degree of social power and impact on their members' lives, public debates and policies.

Figure 1: Model of organization. Own illustration of authors based on the case studies (see footnote 1) and applying the typology by Ally (2005) that differentiates between association and union model.



Abbreviations: ARG – Argentina, BRA – Brazil, CAN – Canada, CHI – Chile, CZ – Czech Republic, DR – Dominican Republic, GER – Germany, GHA – Ghana, HK – Hong Kong, IDN – Indonesia, IND – India, NGA – Nigeria, NL – The Netherlands, US-CA – California, US-NYC – New York City, PHI – The Philippines, RSA – South Africa, UK – United Kingdom, UR – Uruguay.

What is methodologically important to note is the problem of quantification, in the figure partially represented as social power. Given data limitations we do not intend to quantify the density and amount of activities of and for domestic workers, instead we characterize the type and principal logics. In the middle we include a threshold 'union structure'. All entries right of the threshold indicate that in the respective country trade unions somehow officially deal with

domestic workers issues and have union structures for the sector. Even though the threshold appears to be clear, it is in fact a blurry threshold. In Germany, for example, all criteria for the union model are fulfilled (existence of a trade union that covers household services, even a collective bargaining agreement). However, in reality only very few domestic workers are covered by it, in particular not those working under precarious conditions and/or migrants. For the trade union domestic work plays only a marginal role. This is in the figure visualized by a low degree of social power. Another case that needs to be explained is the United States where domestic work, as understood by ILO C189, actually consists of two different categories of workers, with different rights, and different organizations, one of which is a trade union, the other of which has kept an associational status. Nonetheless, domestic workers are organized in new ways and the framing is very much a labor one. Therefore we differentiated between the US as a whole and the specific situation in California.

## **7. REVISITING THE QUESTION OF THE MOBILIZATION OF SOURCES OF POWER**

The global mapping illustrated that domestic workers form unions and associations, as well as a hybrid model that combines strategies. The current section focuses on the relative power of the domestic workers along three axes: the individual power of domestic workers to associate, the power of domestic workers to maintain voice and representation within larger union structures, and the power of their organizations – whatever the form – to achieve and realize their workplace rights.

### **7.1. Power to form organizations and to sustain them (associational power)**

The data collected shows that domestic workers do have the power to associate, and in fact, this has been proven by the founding of the *International Domestic Workers' Federation* (IDWF) in 2013 (for a short history see <http://idwfed.org>), which includes some 69 organizations of domestic workers in about 54 countries. At the time of writing, the IDWF reports a total membership of 500,000 domestic workers worldwide. Within the scope of the organizations

reviewed in this study, memberships ranged from a few dozen to the tens of thousands. In traditional industrial unions, these numbers are considered very low. However, recalling Jenkins' argument, the power of an organization is not necessarily to be measured quantitatively. This is plausible because domestic workers tend to use advocacy power over social or structural power to achieve their demands.

Achieving even these numbers come at great cost in terms of human resources. Resource constraints and sustainability are challenges across all organizational forms. Even when there are thousands of dues-paying members, domestic workers' unions do not bring in a lot of income to support staff organizers and administrators. Only a few domestic workers' organizations (unions and associations) succeeded in collecting dues. The low wages of domestic workers mean they have a low capacity to contribute membership dues. In places where there is a high concentration of undocumented migrant domestic workers, a lack of bank accounts also makes dues collection a logistical challenge. These factors come in addition to the cultural differences in dues payment that can sometimes be observed between associations and trade unions.

As a result, domestic workers' organizations have had to be creative in sustaining themselves. Some organizations are supported by faith-based organizations, foundations, or by national trade union centres; financially or by leveraging in-kind support in the form of meeting space, legal services, etc. In the hybrid models, or when the domestic workers' organizations are outside of a union structure, the unions sometimes provide support services, such as help with labour disputes, access to health insurance, legal representation, language classes, and support for campaigns (using their more "legitimate" status to advocate for rights). Even when domestic workers have not formed unions, national trade union centers have shown solidarity with associations on some occasions by providing such services. The reliance of domestic workers on others arguably makes their organizations precarious and dependent. Thus the IDWF's mission is to build strong, sustainable, and independent organizations of domestic workers.

Another important finding is that the associational power of domestic workers increased when organizations were able to overcome diversity within the

workforce to organize as *workers*. While emblematic of unionism, organizing as workers was also a trait found in the hybrid model, and also within associations occasionally. Indeed, organizing across nationalities, ethnicities, language groups, and immigration status was an important strategy to combat competition and the creation of hierarchies between workers, and stratification of rights according to ethnicity, religion, language, or immigration status. *Domestic Workers United* in New York, and later the nation-wide *National Domestic Workers Alliance* actively built coalitions among various migrant groups (Hobden 2010), an approach that is similar to the loose coalition of organizations in Italy, FADWU in Hong Kong and the FNV in the Netherlands, which are composed of various ethnic groups of migrant workers coming together to advocate and organize under the same banner.

## **7.2. Power to develop a collective voice within a movement or a larger union structure**

In the beginning of this article, Jenkins' view of the qualitative aspect of social power was put forward, which "refers to the development of the membership in their individual capacities and in their ability to function democratically and assert their interests." (Jenkins 2002: 84). While Jenkins claims that unions have low qualitative capacity for social power, our research has found that domestic workers' organizations significantly invest in leadership development.

The formation of a collective identity as workers, but also along other identity frames, is a first step towards the identification of collective claims and objectives. In most of the case studies we found that domestic workers organizations had the ability to shape and maintain those collective claims and to position themselves within a larger movement or organization.

The more voice and control domestic workers have over their organizations and campaigns, and the larger their numbers, the closer they come to realizing their social power. In examining the case studies, we therefore asked three questions: what position do domestic workers have in decision making within the peak union structure? Can they create their own platform of demands and represent that platform? And are domestic workers empowered to be leaders through

training opportunities? A cross examination of the cases showed that, while domestic workers' organizations might gain institutional power by joining a peak union, doing so also raises the risk of them losing their collective voice within the peak union. This phenomenon is not particular to domestic workers: this is the reason why trade unions have established youth or women's committees. It is not unusual to hear domestic worker unionists complain that they feel marginalized within the larger union (such as was recorded in the case of Brazil).

As such, we found that the hybrid model provides the opportunity for domestic workers to achieve both qualitative social power and the institutional power of a union. By forming discrete associations (or singular unions), domestic workers maintain the space to develop their collective voice and common platform of demands, without the dilution of predominantly male, non-migrant, and otherwise dominant trade union members. When these groups join together, informally or formally, they build their identity as workers (as observed in New York, Hong Kong, the Netherlands, Italy). From here, various paths have been taken: in Hong Kong, the domestic workers' unions formed first according to nationality, and then formed the *Federation of Asian Domestic Workers Unions*, which in turn affiliated to the *Hong Kong Trade Union Confederation* (the peak organization). This way, the domestic workers maintained their space for decision-making, while also having access to the peak union's resources and influence. The domestic workers in the Netherlands developed a similar structure. In the United States, DWU, and later the *National Domestic Workers Alliance*, kept their status as an association, and formed alliances with national unions such as the SEIU, eventually entering into a formal partnership with the AFL-CIO, a peak workers' organization. To ensure voice within these peak unions, the Dutch FNV Bondgenoten, and the Brazilian *Confederação nacional dos trabalhadores no comércio e serviços* (CONTRACS) have taken proactive measures – a certain form of affirmative action – to promote the representation of domestic workers on their executive committees. The FNV Cleaners' Union, which, at the time our research was being conducted, was organized into geographically bound organizing committees, ensured - despite their lower numbers in the union - a space for the collective voice of domestic workers by creating an organizing committee (OC) of its own. The domestic



workers' OC was composed of 30 members who were elected by the self-organizations. The OCs were governed by the Cleaners' parliament, which was composed of 75 seats, and had the power to approve the union's annual plan. Each OC had a specific number of seats allocated to it. The structure allowed each OC to bring their own issues to the table, based on their city, region – or sub-sector in the case of domestic work. Domestic workers had six parliamentary seats. Typically, one of these six domestic workers stood for election to the Cleaners' Union Government, composed of 12 seats. Usually, the domestic work candidate got a seat; however, in 2012, none were elected. In response, parliament tabled a proposal to better ensure domestic work representation in the Cleaners' Union government. Such actions ensure that the unique views and concerns of domestic workers make it to the table.

Creating space for domestic worker leadership within a union is one of the means of empowering domestic workers as a group; however, that leadership position must also be supported with training. Several of these hybrid organizations have therefore developed leadership training programmes to ensure that domestic workers could effectively represent their members. Perhaps the most advanced leadership training of domestic workers is carried out by the United States *National Domestic Workers' Alliance* (NDWA). It includes issues such as campaign development, political analysis, organizational development, strategic planning, communications and fundraising. The course also provides opportunities for domestic workers to do apprenticeships in some of the member associations. SADSAWU, FADWU, the FNV Cleaners' Union, and many others offer similar leadership training.

### **7.3. Power to effect change**

Wright (2000) claimed that effective organizing must have sufficient associational power to be able to undermine employer ability to set rules unilaterally or to influence policy, and to interfere with the smooth functioning of labor markets. While many of the reviewed organizations were involved with policy campaigns, there has been less headway at achieving change at the

workplace level. This underscores that domestic workers have yet to identify how to optimize their associational power, and realize their social power.

Given the time it takes to win advocacy campaigns, our study has not judged the organizations on their perceived successes or failures. Rather, what we observed was the tendency across all organizational types – union, association or hybrid – to use strategies that relied on moral power, rather than on the structural or social power of domestic workers. Across the board, the message embraced by the organizations was that laws should protect domestic workers because it is the right thing to do, because domestic workers are workers, and that they deserve protection and respect. Some campaigns referred to the affective bonds between domestic workers and employers. To this end, most domestic workers' organizations, particularly the associations, built alliances with women's organizations, faith based groups, trade unions or supportive employers of domestic workers. The aim was 'winning the hearts' of the greater public, which included the key target group of employers.

Success in campaigns was also somewhat dependent on the relationship with the peak union, or in other words, the union that participates in policy dialogue. In New York, domestic workers often met with legislators during their campaign for a bill of rights for domestic workers hand in hand with allies from trade unions who had relationships with legislators (Hobden 2010).

In contexts with a high percentage of undocumented migrants, trade unions often hesitate to pro-actively engage with the issue (for the Netherlands see Eleveld and Van Hooren 2018). This originates in the ambivalent role of trade unions' in- or exclusive solidarity and migration as a contested issue (Marino et al. 2017).

During the process of negotiating the ILO Domestic Work Convention in 2009-2011, relationships with national trade union confederations helped domestic worker representatives all over the world to discuss issues with their governments, and to participate in the workers' groups during the International Labour Conference. The domestic workers' union in Uruguay, the *Sindicato Único de Trabajadoras Domésticas* (SUTD), was supported by the national trade union confederation in negotiating agreements (including the training of the domestic worker representatives in negotiations). The affiliation of a domestic workers'

union to the peak trade union therefore leveraged a certain amount of institutional power that facilitated the voice and representation of domestic workers in their campaigns for policy reform locally, nationally and globally. It is important to note though that domestic workers' associations were also able to leverage the institutional power of unions through less formal, and often less stable partnerships.

## 8. CONCLUSION

While all workers face challenges in achieving the different types of power, domestic workers face a particular combination of challenges: Firstly, given the particular position in the labour market, their structural power is very weak. Second, when they have formed collectives, their organizations tend to have low power to make desired changes – traditionally, unions are the entities that are recognized by the state as a social partner, and that are endowed with the right to organize and bargain collectively. Third, domestic worker organizing does not result in high numbers of new members. Fourth, within unions domestic workers often face discrimination, or are not recognized as workers by their unionized counterparts, many of whom are employers of domestic workers themselves, and who tend to be from formal sectors, dominated by male leaders. Fifth, in cases where domestic workers have joined multisectoral trade unions, they face challenges holding on to their ability to maintain a collective voice and related ability to set a common platform of demands. However, their status as union members can give them the advantage of the political recognition and role of trade unions within the state structure.

Given these challenges of organizing within trade unions and because domestic work is simultaneously 'work as any other' and 'as no other' (Mundlak and Shamir, 2011), successful domestic worker organizing requires a balance: to unionize in order to increase their institutional power, and to maintain their collective associational power as a specific category of workers.

Despite these serious challenges, the analysis of a diverse set of countries has shown that domestic workers are not unorganizable in general. They organize to meet their own, diverse needs (as women, as migrants, as isolated workers

etc.). Between the two options discussed so far in the literature, association and union model, many domestic worker organizations have chosen a hybrid path, including in regions with a lot of (undocumented) migrant domestic workers: to be organized 'amongst themselves' in associations and at the same time these associations are linked to or integrated into a trade union. A type of actor that is necessary for this hybrid form are 'bridge persons' who are embedded in both organizational cultures and communities. They convince unions to engage in this field and vice versa they convince the domestic workers to unionize.

Related to this finding, we see a trend of an 'emerging trade unionism' in many of the countries studied, which means that we tend to find more trade union-related forms of organizing than, say, a decade ago. One factor that supported this development is the "governance struggle" (McCallum, 2013) of winning the International Labour Organization's Convention and the related Recommendation "Decent Work for Domestic Workers" in 2011. Domestic workers gained global power by exercising their acquired advocacy power and strength through their global networking (Schwenken, 2017). In the lead up and follow up to the adoption of C189, domestic workers' organizations forged important ties with the broad trade union movement, notably under the ITUC (International Trade Union Confederation) 12 by 12 campaign for ratification of C189. This governance struggle also led to an increased collaboration and trust-building between organized domestic workers and trade unions. This is what the Kenyan organizer Vicky Kanyoka speaks about in her introductory statement to this article. All in all, our analysis of successful and unsuccessful cases of trade union collaboration and incorporation indicates that domestic workers' autonomy is crucial to be free and independent workers' organization – to build collective identity and associational power, and represent their own interests. Trade union structures can support domestic workers by providing access to consultation mechanisms, to representation within the union, and by providing services, space and staff – and are then more likely to also win them as active members.

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