State-Induced Precarity of Domestic Workers?
A Comparative Case Study of the Domestic Work Sector in Singapore and Argentina

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ABSTRACT

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The extent to which paid domestic work is treated differently from regular work brings me to question how Singapore and Argentina's governance of their respective domestic work sector keeps paid domestic work at the lowest possible echelon on the labour scale so it may remain a service as flexible and affordable as possible to middle and upper-class dual-income families. Furthermore, by leaving the responsibility of early childhood care or elderly care in the hands of individuals and families, the state is able to remain relatively uninvolved financially and institutionally in the provision of such services all the while recognizing the importance of paid domestic workers to the economic prosperity of households and national economies. Despite significant differences in Singapore and Argentina's opposing domestic work sector regimes, the first being thightly regulated by the state and the second characterized by a widespread informality, the outcome for female domestic workers is the same, i.e. most experience precarious work conditions. My main hypothesis is that, despite their diverging objectives and implementation processes, existing labour policies in Argentina and Singapore effectively contribute to the precarity of domestic workers by limiting their human and labour rights as well as their occupational choices and professional trajectories. The analytical comparison of domestic work in Argentina and Singapore gives high priority to the key concept of precarity as it intersects with state labour policies that govern the domestic work sector in the dissimilar political, social, and economic contexts of Argentina and Singapore. Although all domestic workers experience some forms precarity due to the labour laws that govern their sector of activity, I find that economic precarity characterizes mainly domestic workers in Argentina as where domestic workers in Singapore suffer most importantly from affective and social precarity.

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Chapter 1 Introduction

Domestic work is everywhere in the world associated with women and perceived as a woman's work (Rollins 1985, 21; Lan 2006, 13; Mehta and Awasthi 2019, 134) because women have been the traditional providers of care for the young, the disabled, the sick, and the elderly (Uttal and Tuominen 1999, 758). When domestic work began to be outsourced, understood in the present context as paid work done by a non-member of the household (Shahvisi 2018, 18), paid domestic work represented the most accessible and often the only source of work and main entry point into the labour market for low skilled women of the Global South (Razavi and Staab 2010, 412; Du Toit 2011, 3). The International Labour Organization (ILO) defines domestic work as "work performed in or for a household or households" (ILO, 2011 Convention 189, art. 1a) and domestic workers as "any person engaged in domestic work within an employment relationship" (ILO, 2011 Convention 189, article 1b). Paid domestic workers are expected to accomplish various tasks among other things to cook, clean, do the laundry and ironing, mind the children, care for the elderly, sick or disabled persons in a household on a regular basis (Esquivel 2010, 478; Blofield and Jokela 2018, 533). These tasks are part of the social reproduction work that, even in its paid form, is not considered productive work because it does not directly yield a profit for whomever pays for it (Tayah 2016, 52). Latin America and Southeast Asia are the two world regions with the highest numbers of domestic workers (Gorban and Tizziani 2019, 125; Filgueira and Franzoni 2019, 245; Jokela 2015, 387), a fact that mirrors inadequate care service provisions for the young and the elderly and deep-rooted cultural patterns in the Global South in terms of familial ties and responsibilities (Faur and Pereyra 2019, 25; Smith 2012, 161).

In the 1980s, the commodification of paid domestic work or "marketization as the attachment of monetary value to previously unmonetized activities" (Mundlak and Shamir 2011, 295) was seen as a solution to the care crisis that surfaced when were made apparent the shortcomings of the social reproductive work at the family, community, or state levels necessary to support the productive work of dual-income households (Huang and Yeoh 2015, 183; Abrahamson 2017, 1; Du Toit 2011, 3).[1] The need to attract and ensure a constant supply of domestic workers to counter the care crisis brought governments of wealthier economies of the Global South, such as Singapore, Taiwan, and Hong Kong in Asia, and Argentina and Brazil in Latin America, to regulate the domestic work sector generally through labour legislation (e.g. work permits, formal registration, and/or specific working conditions), which at times may entail human rights restrictions (e.g. of mobility, association or free speech) (Islam and Cojocaru 2016, 51). The restrictions are particularly severe in Singapore where all domestic workers are foreign migrants facing tightly closed political opportunity structures due to Singapore's authoritarian government that limits social movements' mobilization and representation for social claims and grievances

[1] A discussion on productive and reproductive work will follow in next chapters. Suffice to say for now that productive within a capitalism economic perspective is work done for a profit as where reproductive or social reproductive work does not yield a profit by those who pay for it.

especially of non-citizens (Bal 2015, 219), despite the fact that Singapore displays the most sophisticated quality of authoritarianism, according to Morgenbesser (2020, 2).

I have chosen to focus my research on the precarity of domestic workers in two specific countries, Singapore and Argentina, because these two states offer a pertinent comparative analysis opportunity as they present significant differences in terms of their geographic location, political regimes, social and cultural characteristics, patterns of domestic work governance, social and political opportunity structures as well as labour policies affecting domestic workers. Furthermore, in Singapore, as is the case generally in Asia, South-South workers' migration is "regional in scope, temporary in duration and single in migration category" (Rahman 2017, vii), as where in Argentina, citizenship status and family migration are easily accessible to migrant workers, especially for those from the Mercosur trading bloc (Habib 2016, 23). However, in terms of similarities, both states share a colonial past, a heavy reliance on paid domestic work, and both represent states where domestic workers are found in great numbers and where most face precarious work conditions. In both Singapore and Argentina, domestic work is regulated by a different labour law than the national labour law that governs all other workers, establishing de facto domestic workers as non-regular workers. The non-recognition of domestic work as regular work by political and social actors as well as by the general population, the hidden nature of their workplace, and the informality of their employment relationship, understood here as a relationship of a different nature to the one generally experienced in conventional workplaces, are important factors that increase the risk of exploitation and abuse (D'Souza 2010, 1), corollaries of precarious work for domestic workers. Also, both states are located in world regions where social and economic inequalities persist between or within countries, enabling elites to access an affordable and ample supply of domestic workers which disengages the state from the expense and responsibility for the provision of child and elderly care public services.

1.1 Research question

I question the role of the state in the making and persistence of the precarious conditions experienced by domestic workers in Singapore and Argentina as I formulate my research question in the following terms: **To what extent are the labour policies of Argentina and Singapore responsible for the precarity of domestic workers within their borders?**

The limited requirements to access the paid domestic work sector are reflected in the activity's treatment as unskilled and unrecognized work, that is work unlike any other waged work, often referred to in the literature as real work. Real work, or regular work, the terminology I will favor, refers to a legitimate and regulated paid employment within the formal labour market activity. Even if paid domestic work is similarly characterized by a demand, a supply, a wage configuration, and employment relations as any other form of work (Mehta and Awasthi 2019, 134), its non-recognition as regular work makes it one of the most devalued, undervalued, underpaid, and precarious work vulnerable to exploitation and abuse, according to numerous authors who study the matter of domestic work, (Islam and Cojocaru 2016, 49; Gorban and Tizziani 2019, 125; Duffy 2007, 313; Smith 2012, 159), when it is not plainly stigmatized as a dirty work (Bosmans et al. 2016, 54). Furthermore, domestic workers suffer from major decent work deficits in terms of employment, representation and organization opportunities as well as

legal rights and social protection (Islam and Cojocaru 2016, 55; McCann and Murray 2014, 325) as will be illustrated by the cases of domestic workers in Singapore and Argentina in the present thesis. In sum, domestic workers belong to the poorest sections of society within the Global South countries (OECD 2012, 225).

The extent to which paid domestic work is treated differently from regular work brings me to question how Singapore and Argentina's governance regimes of domestic work keep paid domestic work at the lowest possible echelon on the labour scale so it may remain a service as flexible and affordable as possible by middle and upper-class dual-income families. Furthermore, by leaving the responsibility of early childhood care or elderly care in the hands of individuals and families, the state is able to remain relatively uninvolved financially and institutionally in the provision of such services all the while recognizing the major contribution and need of paid domestic workers to the economic prosperity of households and national economies (Huang and Yeoh 2015, 170). Despite significant differences between Singapore and Argentina and their opposing domestic work sector regimes, the first being thightly regulated by the state and the second characterized by a widespread informality, the outcome for female domestic workers is the same, i.e. most experience precarious work conditions resulting from a dependence on the good will or whim of the employer who may or may not treat their domestic worker decently (Parrenas and Silvey 2018, 431), the asymmetric master-servant relationship in which the employer has the upper hand in requesting and maintaining the work permit in Singapore and accepting to register the domestic worker in Argentina (Blofield 2012, 13; Romero 2018, 1185; Esquivel 2010, 489), and an unpredictability of employment duration and conditions since in both countries the employer can end the work relationship at will (Butler 2012; Parrenas and Silvey 2018, 433).

Singapore has put in place a system for contract workers based on a work permit that "severely restricts the occupational mobility of migrant workers and seeks to ensure they do not integrate within Singapore society" (Bal 2015, 219). According to this system, the domestic work sector is characterized by formality since it is strictly regulated with the objective of monitoring the presence and number of domestic workers in Singapore, ensuring that all domestic workers, who are all foreign workers, remain transient workers in Singapore as stipulated by an employment contract that ties each domestic worker to a single employer, who then in turn holds the full responsibility for the domestic worker's well-being and her obedience to the legal obligations during her stay in Singapore. The system thus results in the state's disengagement, or hands-off approach, once the domestic worker has entered officially into the contractual relationship with her employer. However, this type of formality by no means protects domestic workers against experiencing precarious work conditions characterized by a high level of uncertainty, since the employer can terminate the work contract at any time, cancelling de facto the work permit that allows her to work and remain in Singapore. Limited rights and protection against possible abuse and exploitation also contribute to foreign domestic workers' precarity while working in Singapore.

In Argentina, despite the state's efforts to formalize the domestic work sector in order to provide domestic workers with the same protection and rights to public services offered to all registered workers, most employers and domestic workers remain, voluntarily or not, in an informal employment relationship because the choice between formality and informality, or registration or non-registration, is possible. Barriers to formality, such as working hours rules for

a same employer, the social acceptability of informal arrangements, the preference of employers to employ only unregistered workers or the limited capacity of the state to enforce its own labour policies are among the factors at play against higher rates of registration and formalization that would diminish considerably the precarity of domestic workers.

The increasing numbers of domestic workers over the years since the 1980s in wealthier countries of Asia and Latin America are fueled by demand factors, such as demographic changes, absence of welfare care provision, and increasing female participation in the labour force as well as by supply factors, such as high poverty rates, limited employment opportunities for unskilled female workers, and gender discrimination in the labour market (D'Souza 2010, V). Thus, regions that exhibit substantial national and regional socio-economic inequalities within or among countries see "these inequalities produce both the demand for the out-sourcing of domestic activities and a ready supply of inexpensive labour" (Blofield and Jokela 2018, 532; Blofield 2012, 9). Both Singapore and Argentina correspond to countries that are significantly wealthier within their respective region and thus attract domestic workers from poorer sending states. Singapore, the only First World country in Southeast Asia (USNews.com), receives domestic workers mainly from Indonesia, the Philippines, Myanmar, and Sri Lanka (Yeoh 2013, 105). Argentina, one of the wealthiest economies in Latin America (USNews.com), receives internal migrants from its poor rural areas or urban neighborhoods and external migrants from Bolivia, Chile and Paraguay (Chillier and Seman 2011).

1.2 Main hypothesis and sub-hypotheses

My main hypothesis is that, despite their diverging objectives and implementation processes, existing labour policies in Argentina and Singapore effectively contribute to the precarity of domestic workers by limiting their human and labour rights, personal occupational choices, and professional trajectories. For example, in Singapore, the work permit held by the domestic work only allows her to work in the domestic work sector. She cannot study or work in another field on her day off during her stay in Singapore. In other words, I propose that, in Argentina and Singapore, the state, through the labour policies it puts in place and as the main actor attempting to formalize remunerated domestic work, effectively continues and/or intensifies the precarious working conditions of domestic workers in these countries. I also posit two sub-hypotheses. In Singapore, the precarity of domestic workers is mainly due to the government's hands-off approach towards domestic worker-employer relations, despite a highly regulated domestic work sector. In Argentina, the precarity of domestic workers is tied to the formalization requirements, individuals' preferences, and institutional issues that maintain levels of registration of domestic workers low.

On the one hand, the competitive authoritarian Singapore regime (Levitsky and Way 2010, 58) controls the population of foreign female domestic workers on its territory within a framework of strict conditions that limits their labour, citizenship, and immigration rights due in part to concerns, in the words of Huang and Yeoh, of the "unintended consequences of employing foreign domestic workers on Singapore social fabric" (2015, 182). Such consequences, is argued by the state, could disrupt the social harmony so necessary for the country's national survival and economic prosperity (Lim and Leong 2017, 180). A formal work permit system allows foreign domestic workers to enter the country, specifies the duration of their stay, and defines the strict

rules to be upheld in order for the ‘maids’, as they are called in Singapore, to retain the work permit that ties them to their employer and determines their right to remain in Singapore (AFML 2017, 20). However, once domestic workers have entered into the contractual relationship with their employers, they are not covered by the Employment Act (EA), Singapore’s main labour law that regulates all regular workers (Palmary and de Gruchy 2016, 10). By devising the Foreign Maid Scheme in 1978 and the Employment of Foreign Manpower Act in 1991, the state effectively treats domestic workers as non-regular workers, justifies its hands-off approach by invoking the private nature of the domestic worker-employer relationship and the unconventional workplace as sufficient reasons for refusing, for example, to interfere directly in dispute matters between employers and domestic workers (Huang and Yeoh 2015, 179). Huang and Yeoh argue that the system of control of the domestic work sector and the social and political exclusion of domestic workers put in place by Singapore authorities position foreign domestic workers as non-regular workers and the individual domestic worker as the migrant ‘other ’[…] and “an ‘outsider’ by virtue of her class, nationality and gendered work” (2015, 174). The term "foreign domestic worker", rather than migrant domestic worker used by Singapore authorities to identify migrant domestic workers, attests to her permanent foreignness.

On the other hand, since the 2000s, Argentina seeks to formalize domestic workers to combat the widespread informality of the domestic work sector of activity (Bertranou and Casanova 2015, 2; Esquivel and Pereyra 2018, 476). Informality, in the Argentine context, is defined as the absence of a written contract and contributions to a social security system in such a way that domestic workers who work informally are unprotected, undeclared, non-registered, and highly vulnerable to exploitation and abuse of all sorts, according to Poblete (2018b, 436), a definition that will also be adopted in the present thesis. For Betti, in the specific Latin American context, the precarity of domestic workers relates to insufficient hours of work, flexible labour arrangements, part-time work, temporary agency work, sub-contracting, and undocumented work (2018, 283) that lead to poverty, as where in Singapore, the precarity experienced by domestic workers is mainly characterized by uncertainty, dependence on employer’s will or whim for maintaining 'alive' the employment relationship, limited rights and protection from abuse, isolation, and few opportunities for representation and organization. In its efforts to encourage the formalization of domestic workers, the Argentine government treats paid domestic workers as quasi-regular workers by offering them the same rights and social protection offered to all other regular workers as long as they are registered (Bromley and Wilson 2018, 13; Romero 2018, 1188). However, as noted by Pereyra, governmental efforts to formalize the Argentine widespread informal domestic work sector was inhibited by its own rigid rules until the passing of Law 26,844 in 2013 that modified the number of mandatory working hours for the same employer (2013, 2). The weakness of the governemental capacity to enforce its labour laws and the entrenched social mindset of employers and employees of the social and economic acceptability of informal work emain an important barrier to higher levels of formalization (Bertranou et al. 2015, 7; Smith 2012, 175).

1.3 Relevance of the research

To my knowledge, no previous study on the domestic work sector and working conditions of domestic workers in Argentina and Singapore has been the object of a formal comparison

highlighting structural and institutional differences and similar outcomes. This new insight may be relevant to domestic work research as it aims to advance the understanding how precarity continues to characterize domestic work, even in a context where domestic work is formalized. For Kalleberg and Hewison, the issue of precarious work "has emerged as a serious challenge and a major concern in the contemporary world" (2013, 271). The study aims to contribute to the precarious work knowledge by examining precarity as a concept, its manifestations, causes, and effects as it is experienced by domestic workers in the dissimilar political, social, and economic contexts of Argentina and Singapore. For example, in Singapore, precarity is a combination of foreignness, strict regulations for domestic work employment, and the work permit system put in place by the government that leaves little or no space to other forms of agency (i.e. non-governmental organizations, unions, employers or domestic workers associations), as where the liberal government of Argentina still allows the possibility for employers and domestic workers to choose between registration or non-registration because of its weakness or unwillingness to fully implement and enforce the formalization process that should follow from its ratification of the International Labour Organization's Domestic Workers Convention No. 189 in 2014, a landmark convention adopted by the ILO members in 2011 meant to protect the rights of domestic workers and extend the ILO labour standards into the unregulated and unprotected sector of domestic work to guarantee the same working conditions and social security protection to all registered domestic workers, national and migrant alike (Ortiz and Marcadent 2016, 6 and 8).

The way precarious work is studied becomes useful to better understand how precarious workers in various sectors struggle to find alternatives to make their lives bearable within the dominant neoliberal capitalism system. For Arnold and Bonjiovi, this is particularly true in developing economies where the State has never fully assumed its role as a provider, funder, and regulator of workers' social protection (2013, 304). This fact is relevant in Singapore where domestic workers are confronted with forms of indifference on the part of the authorities towards their general well-being, except when Singapore's international reputation is at stake (e.g. day off policy change following an international criticism of Singapore's treatment of domestic workers) or when the prospect of a supply crunch of domestic workers arises (e.g. competition from Hong Kong offering better working conditions to domestic workers) endangering the continued economic prosperity of Singaporeans.

According to Marin, even if the exploitation and marginalization of precarious workers may take different forms and various degrees, their suffering is the same to the extent that in all cases the precarity they experience is "a social scandal of our times" (2013, 154). It is therefore critical to better understand the conditions and structures that produce the economic and social precarity under which female domestic workers struggle to make a decent living for themselves and their families, all the while, as highlighed by Yea, taking enormous economic, intimate, and physical risks (2019, 552). The risks are economic as domestic work entails monetary implications for the worker, such as administrative, transportation, agency, and training fees, all of which may create a debt bondage that force domestic workers to stay in the employment of an abusive employer (Platt et al. 2017, 121). The intimate risks compromise the psychological health of the domestic worker because of the stress and anxiety caused by the precarious work conditions (Bauleo et al. 2018, 450) as well as their personal integrity since cases of rape, physical, and psychological abuses, leading in some cases to suicide, are not infrequent, as reported by Huang and Yeoh (2015,

177). Finally, physical risks have led to physical disabilities and even to the death of domestic workers forced to perform dangerous tasks (Huang and Yeoh 2015, 176).

1.4 Research method

The analytical comparison of domestic work in Argentina and Singapore will give high priority to the key concept of precarity as it intersects with domestic work and state labour policies. I seek to understand how precarity relates specifically to the governance of domestic work in Singapore and Argentina and why domestic workers experience precarious working conditions in both Singapore and Argentina despite national structural and institutional differences. The concept of informality will also be given some space for discussion since it is a major characteristic of domestic work in Argentina. I will examine the situation of domestic workers through the theoretical lens of the literature on precarious work as it relates to formal and informal contexts of domestic work and public labor policies. The nexus of precariousness and (in)formalization complicates the understanding of domestic work itself as a means for low-skilled female domestic workers to make a living despite limited human rights, social benefits, and decent working conditions in both states. Linking precarity and (in)formalization brings into the picture a more nuanced analysis of domestic work other than the binary and deterministic solution according to which formalization is necessarily good and non-formalization necessarily bad.

Since fieldwork is not possible in the present context, the study will be based on primary sources, such as governmental documents, newspaper articles, and international and national organizations' reports. It will also use secondary sources, mainly academic journal articles. I will proceed with a comparative analysis of different conditions and similar outcomes as I seek to enrich the understanding of the difficulties experienced by domestic workers in two national contexts by comparing and contrasting their working conditions as they navigate within the respective labor regime that governs their activity. The study will be mainly qualitative in nature, but occasionally use quantitative data when appropriate. It will use governmental archives to analyse laws, policies, and regulations that affect domestic work in each state.

The study will take a Global South perspective as it will aim to explain domestic workers' precarity and its characterization as it is experienced by domestic workers in Singapore and Argentina, two countries located in two different regions of the Global South, Southeast Asia and South America respectively. Care work and domestic work labor markets in the Global South are marked by heterogeneity and a "widespread inequality, defined by high levels of labor market segmentation, notably along the lines of formality/informality, gender, income, and educational qualifications", as noted by Esquivel and Pereyra (2018, 463). As such, this heterogeneity opens up various compelling avenues of research. However, the thesis will focus on the nexus of precarity and national labour laws that affect the working conditions of female domestic workers in Singapore and Argentina in the present-day neoliberal globalization context of the first decades of the twenty-first century, without putting aside totally the historical roots of domestic work in each state for, as always, the past helps to explain today's reality.

The thesis continues to develop as follows: Chapter 2 proceeds with a literature review on various aspects of domestic work within academia debates on the matter and within the reality of domestic work in Singapore and Argentina. Chapter 3 develops the theoretical framework used to support the main hypothesis and sub-hypotheses. Chapter 4 contextualizes domestic work in a historical and statistical perspective globally and nationally. Chapter 5 focuses on the labour laws in relations to the dimensions and subdimensions of precarity that affect domestic workers in Singapore. Chapter 6 looks at the intersection of the issue of informality, labour laws, and dimensions of precarity that relate to the domestic work in Argentina. Chapter 7 concludes with a comparison of the dimensions of precarity experienced by domestic workers in Singapore and Argentina as a theoretical contribution on the topic of domestic workers' precarity. It will offer recommendations in terms of policy changes to alleviate the precarity of domestic workers.

Chapter 2 Literature review on domestic work and overview of its governance in Singapore and Argentina

The first part of the literature review situates paid domestic work within the larger care work economy, questions the long-term status of domestic work as non-regular work by opposition to other sectors of the care work economy, and discusses the issue of domestic work as reproductive or productive work. The second part will present an overview of the governance of domestic work in the specific contexts of Argentina and Singapore. The third part identifies the specificities of domestic work leading to the definitions of domestic work and domestic workers adopted in the present thesis.

2.1 Domestic work within the care work economy

Domestic work is part of the larger care work economy. Care work has two major components. The first component is a relational one that involves face-to-face relations to meet the physical and emotional needs of those to which care is given; it is the nurturing aspect of care work that contributes to the development and upkeep of the human capabilities of the recipient (Razavi and Staab 2010, 409). The second component is the non-relational one that involves the physical tasks of the reproductive work such as washing, cleaning, cooking, and feeding those under one's care (Razavi and Staab 2010, 409). Both components of care work have been socially constructed as essentially feminine, normalized as a labour of love for which monetary reward is not expected (Tayah 2016, 14; Boris 2017, 85), and the feminine gender perceived as 'naturally' more empathetic and nurturing (Huang and Yeoh 2015, 178). A very broad definition of care work can include work performed by doctors, nurses, pre-school, primary, and secondary school teachers, university-level professors, therapists, nannies, health aides and domestic workers (Razavi and Staab 2010, 409; Esquivel 2010, 478). My study will take a narrow and specific perspective of care work as it will limit itself strictly to the domestic work performed by paid domestic workers within the home of their employers as the locus of their care provision.

2.1.1 Domestic work as paid work

Worldwide, domestic work is a female-dominated occupation with 83% of domestic work done by women, a number that climbs to 90% in Latin America and almost 82% in Asia (ILO 2013, 28). Domestic work may include a variety of tasks from cleaning and cooking, taking care of children or elderly people, to doing the errands and the laundry or any other tasks usually done for free by females of the household when a paid domestic worker from outside the family is not hired. The main *raison d'être* of paid domestic work for domestic workers is to allow them to make a living while sustaining the productive labour of the dual-income families. Reconciliating the rights of employers and domestic workers within the employment partnership involved in the paid domestic work sector is where I see the role of the state coming into the picture as an involved or remote legal mediator depending on the status it is willing to grant domestic workers as regular or non-regular workers and the entitlements that come with the granted status.

Before women's participation in the labour force in great numbers in the 1970s and 1980, the widespread gendered distribution of roles and responsibilities within the household rendered women economically dependent on the male household head, i.e. subjected to the social

regulations of the male breadwinner / female caregiver contract, whereby "time allocated to the employer in exchange for a wage was defined as time spent at work in the public sphere whereas time spent in the private sphere, including responsibilities attached to biological and social reproduction, was conceived as and expected to be performed for free" (Vosko 2009, intro. 3), contributing to or explaining the low value given to domestic work even in its paid form.

In the industrializing countries of the Global South of the 1980s, women's responsibilities in childcare and housework were fully or partially transferred to female domestic workers to allow middle and upper-class educated female household heads to work in the public sphere and receive payment for their work (Blofield and Jokela 2018, 532). With the increased purchasing power of dual-earner households and the exclusive reliance on the nuclear family for household and childcare, by opposition of the extended family assistance model, the hiring of a domestic worker was seen as the best available solution to the care deficit (Mehta and Awasthi 2019, 133) arising with the lack of adequate public service provision for child and elderly care (Smith 2012, 192). For low socio-economic and low skilled women, the care deficit opened and/or widened the entry point into the labour market as domestic workers, even if it entailed a dependency on the good will of her employer, most often the female household head, in position to decide on the nature, duration, and conditions of her employment as an 'extension of the housewife' (Hodges 1994, 5). However, remuneration for her work did not make the domestic worker a regular worker deserving the same social, economic, and political recognition given to all other workers.

2.1.2 Paid domestic work as regular or non-regular work

Some authors argue that the non-recognition of domestic work as regular work is due to the fact that no particular skills are deemed to be required for its exercise (Hodges 1994, 5; Esquivel 2010, 478; Mehta and Awasthi 2019, 135) and to its perception as feminine work due to the relational component of the care work for which women are seen more naturally suited for (Huang and Yeoh 2015, 178; Tayah 2016, 15). Such persistence of traditional and social myths are re-enforced by existing patriarchal notions and norms found in most societies, which contribute to maintaining domestic work in a state of low wage employment, inferior status, and largely divested of any basic rights (Mehta and Awasthi 2019, 134; Smith 2012, 160).

Another factor relates to the fact that paid domestic work is performed in the private and intimate sphere of the home, 'a place saturated with feelings and emotion', according to Gutierrez-Rodriguez (2014, 46). The employer's home, an unconventional workplace outside of the public view, renders paid domestic work invisible (ILO 2010, 1), increases the risk of abuse and exploitation, and isolates the domestic worker from possible support groups (Hodges 1994, 4). Blofield and Jokela argue that the unconventionality of the workplace explains why most employers of domestic workers do not perceive themselves as regular employers, do not consider domestic workers as regular workers nor their relationship as a truly regular employer-employee working relationship similar to other business relationships (2018, 533). On the one hand, as explained by Huang and Yeoh, the intimate and highly personalized relationship between the employer and the domestic worker generates a workplace context "where power relations are masked by the discourse of the 'maid' being 'one of the family" (2007, 197), especially when a domestic worker fulfills care giving needs to children or an elderly person and provides her services as a live-in worker (Tomei and Belser 2011, 431), i.e. who lives with her employers on a

full-time basis and shares the intimacy of the home with the family members. Many authors note how the home can at times become a space where the woman employer abuses the woman employee "based on the asymmetries of class, status, nationality and ethnicity" (Huang and Yeoh 2007, 212; Mehta and Awasthi 2019, 146); where verbal, psychological, and physical violence is not uncommon (Bauleo et al. 2018, 450); and where the home becomes a space of reproduction of inequalities (Brites 2014, 63; Uttal and Tuominen 1999, 759; Gorban and Tizziani 2014, 54).

On the other hand, the workplace can also be a space where affective and emotional ties are created. Ethnographic and sociological studies on domestic work have shown how childcare labour relations and interpersonal relations within the household give way to relationships that approximate familial ties and emotions (Uttal and Tuominen 1999; Gorban and Tizziani 2014; Gutierrez-Rodriguez 2014; Pinho and Silva 2010; Brites 2014; De Casanova 2013). The affective relations between children and the domestic worker often become 'bonded beyond the simple professional ties' that can incur a huge affectionate loss for the domestic worker when the ties are broken once the child grows up or when the employment relationship changes or comes to an end, as noted by Brites (2014, 66). The ambivalent employment status of the domestic worker as a worker or a family member obscures the labour relation and blurs the domestic worker's perception on the nature and status of her work within the household (Perez and Canevaro 2015, 145; Blofield and Jokela 2018, 533). In Singapore, where all domestic workers are live-ins, and, in Argentina, for live-in and live-out domestic workers, the human ties and popular perception of domestic workers are tainted by norms and values constructed and diffused by state labour policies that acknowledge (or not) the economic contribution of domestic workers with proper corresponding entitlements and treatment. For example, in both countries, the fact that domestic workers are not govern by the same labour law that regulates all other workers contributes to the devaluation of their work and their characterization as non-regular workers, thus undeserving of the same protection and entitlements offered to regular workers, in particular for non-citizens.

The simple fact that paid domestic work is given a wage in return for its accomplishment should make it a type of employment like any other work (regular) and domestic workers afforded the same rights, benefits, and treatment as any other regular workers. What then are some of the barriers to a widespread recognition of domestic work as a regular work across countries, other than its links to feminine work borne out of love or obligation and usually done for free? Boris argues that the care work's historical contingency and dependency on larger systems of state provision, "such as the organization of health systems, the sexual division of labour in the family and other workplaces, and gender and racial regimes, amongst other political, social and cultural factors" is to blame as are its lingering links to slavery and servitude (2017, 83). The above discussion brings to light that a complex mix of social, political, cultural, and economic factors seem to matter in the non-recognition of domestic work as regular work.

Although most social scientists acknowledge the importance of recognizing domestic work as regular work, some, like Shahvisi, worry that treating domestic work as any other work (regular) masks the uniqueness or specificity of domestic work and "disguises from policy-makers, employers, and most importantly, domestic workers themselves, that domestic work is founded on injustices, and that these injustices are intrinsic to it" (2018, 18). Blackett also wonders if "paid domestic work with its historically laden subordinate status can be decent work at all" (2011, 42). Crawford raises the issue of paid domestic work as exposing class stratification and race dynamics

in reproductive work among different groups of women (2018, 34). Mundlak and Shamir suggest "that this duality [regular/non-regular] is not an intrinsic aspect of care work but, rather, a reflection of the gendered dynamics that surround care work and the economic interests that shape care markets" (2011, 294). They conclude "that there is no way to decisively choose one option over the other because care work is evidently both" (2011, 307). The matter of considering domestic work as a work like no other (non-regular work) or a work as any other (regular work), is not crucial because, as argued by Jelin more than forty years ago (1977, 141), paid domestic work, for those who engage in it, is often simply a survival strategy.

In Argentina, live-out female domestic workers, who do not live with their employer and go back to their home after their day of work, must deal with the overlap of their productive work as paid domestic workers in their employer's home and their social reproductive labour within their own households (Gorban and Tizziani 2019, 126). The domestic work must negotiate "the blurring of productive and reproductive spaces and roles of her everyday life as someone paid to perform emotional labour" (Huang and Yeoh 2007, 198). The intersection of these multiple roles, especially for female single parents, limits most domestic workers' access to other types of jobs since most cannot afford the time, the energy, nor the money to ameliorate their human capital that could open the doors to better paying jobs (Gorban and Tizziani 2019, 127; Faur 2011, 968). As a result, D'Souza asserts that domestic workers "become trapped in the circle of domesticity and in a situation of deepening economic exploitation and social immobility" (2010, 11). The extent to which the labour policies governing the domestic work sector contribute to this entrapment and social immobility of domestic workers is at the heart of my study.

2.1.3 Domestic work within the productive/reproductive work debate

The discussion of domestic work as regular/non-regular work is also tied to the productive/reproductive debate of domestic work. Friedrich Engels was among the first to draw a distinction between productive and reproductive work in 1884 in an effort to establish the relationship between domestic work and the capitalist production when he affirmed that "[T]he determining factor in history is, in the final instance, the production and reproduction of immediate life. [...] On the one side, the production of the means of subsistence, of food, clothing and shelter and the tools necessary for that production; on the other side, the production of human beings themselves, the propagation of the species." (Engels[2] in Anderson 2001, 25). Socialist feminists of the Global North linked this definition of housework to Marxist economics in an attempt to add value to the housewife tasks in the 1970s by asserting that reproductive work is "indispensable to the ongoing reproduction and maintenance of the productive labor force and society and should be recognized as such" (Duffy 2007, 315). Although it can be argued that unpaid domestic work done by the housewife of the household can be considered productive since it produces human beings who eventually contribute to the workforce of a nation, Anderson argues that domestic work done by family members is precisely what distinguishes it from other type of work governed by the market or the state (2001, 25). Since it is not productive, it is thus uncompensated and unrecognized in a capitalist system.

[2] Engels, Friedrich. 1884. The Power of Women and the Subversion of the Community. Bristol: Falling Wall Press.

When in the 1980s and 1990s, women's increasing participation in the labour force of countries, the theorizing of paid work for men and unpaid work for women became inadequate and the notion of social reproduction made its way in social sciences to be define as "various kinds of work - mental, manual, and emotional - aimed at providing the historically, socially, as well as biologically, defined care necessary to maintain existing life and to reproduce the next generation" (Laslett and Brenner in Duffy 2007, 315). For Duffy, the notion of social reproduction provided researchers with a new way to analyze the "parallel devaluation of paid reproductive labor such as domestic service, cleaning, food preparation, and child care" and to examine why domestic activities, even in their paid form, remain invisible labor, unrecognized, and undervalued (2007, 316). Laslett and Brenner defined reproductive work a set of tasks "necessary to maintain existing life and to reproduce the next generation" (in Duffy 2007, 320). Such tasks can be accomplished by a member of the family, by someone paid to come into the home to answer various needs of those living in a household, or it can be done in institutions, such as hospitals, daycare or elderly care centers, or restaurants (Duffy 2007, 320). When done in the home, remunerated domestic work accomplished by paid domestic workers, generally women often of poor, ethnic minority or racialized background, is linked to the idea of servitude done by forced or slave labor, thus of low status. When done in the public sphere, such tasks are deemed to be a type of service or institutional work, of a higher status, yet mainly segregated by low socio-economic status and racial-ethnic characteristics (Duffy 2007, 320 and 324).

In her research on decolonizing reproductive labor, Charmaine Crawford argues that the issue of paid domestic work raises several other questions, apart from the unequal division of labor of women's work versus men's work and low remuneration and devaluation of domestic work and care work. According to Crawford, it also raises the issues of racial, class, and citizenship stratification of reproductive work among different groups of women within the global economy (2018, 33 and 52). Of particular interest to my study is Crawford's inclusion of the effects of slavery and colonialism on the regional and transnational migratory movements to counter the scarcity of work at home, in particular for unskilled female workers (2018, 34). Both Argentina and Singapore are former colonies, have experienced slavery within their territories, and are now actively sought after by migrant workers looking to improve their life situations.

Recent studies on migration movements globally show strong trends of the feminization of migration as unskilled women from poor countries flock in growing numbers to wealthier countries to find better life opportunities as domestic workers, as demonstrated by Lan's study (2008, 1801). In Southeast Asia, women from the Philippines, Indonesia, Myanmar, and Vietnam leave their families to work in Singapore, Hong Kong or Taiwan either as a main destination or as a stepwise pitstop before being able to migrate to better destinations such as Canada or the United States perceived as better destinations because they offer citizenship and family reunification opportunities. In Latin America, women from Bolivia, Chile, Uruguay, Paraguay, Peru or Columbia make their way to Brazil or Argentina, where the possibility to make a living on a temporary or permanent basis is opened to them, especially for Mercosur citizens.

2.2 The governance of the domestic work sector in Singapore and Argentina

Domestic work in Singapore and Argentina answers the needs of middle and upper-class dual-income families. It has grown over time to become a major employment sector for local or foreign low-skilled women. Domestic work is now a well-established part of the wider care work sector compensating inadequate public provision for children and elderly care services. This section presents a brief overview of the domestic work sector within both states seen in the academia.

2.2.1 Domestic work in Singapore

About one million male and female low-skilled temporary migrants contribute yearly to Singapore's economy and society by taking on low-paid and poorly valued jobs frowned upon by native Singaporeans (Koh et. al 2017, 188; Huang and Yeoh 2015, 167). Among these migrant workers, about 240,000 of them are foreign domestic workers living in one of five households in Singapore (Koh et al. 2017, 191). In 1978, the Singapore authorities introduced the Foreign Maid Scheme (Freire 2015) with the intent of attracting foreign domestic workers to provide childcare and housework to middle and upper-class Singaporean women who could then work outside the home in high-growth industries and participate in the industrialization effort of the newly independent city-state (Dodgson and Auyong 2016, 1). Used as a temporary measure to fill the care deficit, the Foreign Maid Scheme granted a limited number of work permits and restricted the maids' stay to a four-year period to minimize the risk that domestic workers would 'settled in' and 'sink roots', possibly disturbing the social fabric of the young republic (Huang and Yeoh 2015, 169). Nevertheless, advances in Singaporean women's career opportunities, new aspirations of dual-career families, and growing reliance on the nuclear family have contributed to the long-term use of foreign domestic work since 1978 up to the present times, with no end of the inflow of domestic workers in view, as noted by Huang and Yeoh (2015, 168).

Huang and Yeoh argue that the state has continued over the decades since 1978 to impose strict measures "to ensure that while needed, foreign domestic workers are strategically maintained as a transient labour force through a series of legislation" (2015, 169). In 1991, the state put in place the Employment of Foreign Manpower Act (EFMA) that opened the door to domestic workers from a wider variety of countries of origin, regulated them through a series of strict rules, and offered them a limited set of welfare provisions and rights (Koh et al. 2017, 191). Still in effect in the present times, the Act does not protect them in terms of working hours limits, time off during the working days, annual and sick leaves, or reasonable notice periods. So far, the Singapore state keeps in place a formal system and legal regulations that maintain domestic workers politically precarious (no possibility of organizations /unions and NGOs with weak negotiating leverage), socially precarious (limited social network and isolation from family and friends) and economically precarious (no market competition, work permit tied to employer, no minimum wage).

2.2.2 Domestic work in Argentina

As in Southeast Asia, domestic work in Latin America became a key area of employment for lower class women as the demand grew in response to the aging population, the care problem for pre-

school children, the weakness of the welfare state, the break-up of families, and the greater participation of middle and upper-class women in the workforce, as argued by Anderson (2004, 107). In Argentina, the marginalization and precarious work conditions of domestic workers are not only due to the intersectionality of their individual characteristics of gender, socio-economic status, racial/ethnic origins, but also to the high informality of domestic work within the labor force, according to Ortiz and Marcadent (2016, ix). Today, three out four of the one million native-born, indigenous and Afro-descendent women from rural or poor urban areas and migrants from neighboring states who work informally as domestic workers, account for about 17% of the labour force of Argentina (Poblete 2018b, 436).

Despite changes in the labour and dynamics of domestic work in Argentina as early as 1956 (Pérez and Canevaro 2015, 130), most domestic workers in the country experience precarious conditions characterized by long working hours, low wages, difficult living conditions, and little employment security (Pinho and Silva 2010, 95). Romero's study shows that those from ethnic and racial minorities face discrimination, benefit from fewer rest periods, are paid in-kind instead of wages, and, if live-ins, get inadequate food and accommodation and must negotiate working conditions within uneven bargaining power relations (2018, 1185). In the past, the state was rather oblivious to domestic workers' fate as it considered domestic work as work under the exclusive jurisdiction of families (Tomei, 2011, 190), as is still the case in Singapore. However, since 2000, the Argentine government has enacted laws that have increased social security coverage to registered national and migrant domestic workers, has designed innovative public policies, and has adhered to international conventions to remediate the poor working conditions of domestic workers, and, by the same token, it has aimed to encourage the formalization of the large numbers of informal domestic workers. However, in practice, informality remains extremely high. In 2016, 74% of domestic workers in Argentina were not registered (although an improvement from the 84% in 2013) and, therefore, did not have access to social security and pension benefits.

Paid domestic work is excluded from the Argentine Labour Law No. 20.744 that regulates salaried work and establishes rights and obligations for employees and employers (Pereyra 2013, 2). It is instead regulated by a Special Statute on Domestic Work, Decree 326/56, approved in 1956 (Poblete 2018b, 440). The regime established that to be a salaried worker (regular worker), a domestic worker had to work for at least 16 hours weekly in the same household; if this condition was not met, the worker was considered an independent worker excluded from the occupation's regulatory framework (Pereyra 2013, 2). In 2000, Law 25.239 allowed registered domestic workers to receive social security benefits to which the employer had to mandatorily contribute, and to which independent employees, those working for less than 16 hours a week, could also contribute voluntarily to complement the employer's part to obtain social security benefits (Pereyra and Poblete 2018, 67). In 2013, another new regime for registered domestic workers was approved with Law No. 26.844 (Special Employment Contract Regime for Private House Personnel) bringing fully into line registered domestic workers entitlements and benefits (e.g. maternity leave, paid vacation, etc.) with the rest of salaried workers (Pereyra and Tizziani 2014, 7). Argentina's ratification of the Domestic Workers Convention, 2011 (No. 189) in 2014 recognized domestic work as regular work, but the challenge of implementing fully its own labor policies, enforcing labour inspections in private homes, and increasing domestic workers' awareness of the benefits of formalization remain major challenges, as explained by Ortiz and Marcadent (2016, 41).

2.3 Defining domestic work for the purpose of the present thesis

What are some of the specificities of domestic work? Which working definitions of domestic work and domestic worker will the present thesis adopt? The section is divided in two parts that specifically answer each question.

2.3.1 Some specificities of domestic work

When domestic work is performed in or for one single household, it takes on two main status. The first status for domestic workers, migrant or national, is one of a live-in domestic worker, that is one who lives in the house of the employer, shares the home and the intimacy of the daily life of a family or a person for a specific duration of work tenure, usually specified in the contract between employer and employee, if such a contract exists. The work is necessarily done for the same employer and on a full-time basis. This is the case for all domestic workers in Singapore because all domestic workers are foreign workers that hold a work permit tying them to one specific employer and forcing them to live in the employer's home. The second status is one of a live-out domestic worker, that is one who may come to work in the home every day or for a certain number of days a week for a certain number of hours and then returns to her own home at the end of her working shift in the home. The work may be done for the same employer or for different employers during a certain number of hours per day and certain number of days per week. The live-out arrangement is not a possible option for domestic workers in Singapore but it is a much more common choice and a growing preference for domestic workers in Argentina.

A domestic worker may be a citizen or a migrant worker. The employment relationship may result from a formal written contract or an informal verbal agreement between the employer and employee, the former is an obligation in Singapore as where the latter is a more widespread occurrence in Argentina, especially for local women who work informally as domestic workers. An informal verbal contract contributes to the fact that the employers and workers do not recognise the relationship as a working relationship and, as Metha and Awasthi note, "the direct negative fallout of this is the invisibilisation of workers, non-recognition of workers' rights and non-provision of any social protection measures" (2019, 133).

The notion of modern slavery and forced labour have often been used to characterize extreme forms of exploitation, violence, and abuse experienced by domestic workers. This has given birth to a semantic debate over the use of slavery in the present-day context of domestic work, but it is generally understood that domestic workers are thought to perform domestic work on their own free will in Singapore and Argentina. In principle, no one forces them to perform waged domestic work, although family pressure may have been pressing enough for them to start the process of looking for work within their own country or to migrate to another country when work in the home state is not possible or satisfactory enough in terms of conditions, income, and opportunities. For low socio-economic unskilled women, other choices of work may exist such as becoming a street vendor, sex worker, or factory worker. Such activities may seem less acceptable or engaging than domestic work to fulfill the need of economic survival of young women.

The definition of domestic work used in the present thesis as work performed in or for a household(s) includes the fact domestic work is done freely by opposition of slave or forced work in theory. The State has a critical role to play so that domestic work is performed voluntarily through the labour policies it enacts ensuring that the protection offered is sufficient to avoid that domestic work is not or does not become forced or slave labour within its borders. In this vein of thought, Kabat et al. open an interesting debate on the question of economic and non-economic forms of coercion in relation to work and freedom. In a capitalist system, as Kabat et al. argue, workers are not totally free to enter or to leave the labour market at will, except in a context of full employment; therefore, for economic reasons, most workers are not totally free from the obligation of working for necessity reason, whether the work brings a full satisfaction or not (2017, 52). The authors mention "language difficulties, geographical isolation, lack of housing of one's own, fear of deportation, intimidation" (Kabat et al. 2017, 52)] as non-economic factors that might prevent someone from leaving an employment relationship on his or her free will. Such factors may keep vulnerable domestic workers in an unbearable employment relationship and unfree labor situation, especially for live-in workers. In this sense, domestic workers may fall into to the category of workers described by Kabat et al. as "slaves [that] make up a social class whose excess labor is appropriated by the dominant class through a particular form of extraeconomic coercion, property rights over the human being" and a class "deprived of liberty by official policy of the state" (Kabat et al. 2017 53).

The only solution offered by Kabat et al. is "to promote collective organization of these workers so that they can fight for better labor laws and better enforcement" (2017, 60). Although this solution is possible in democratic states, I would argue that this is not always a possible solution in an authoritarian context. In Singapore, where the state is the ultimate actor determining the extent of the rights and protection it is willing to grant foreign workers within its borders, civil society can at times influence public policy and legislation in favour of domestic workers but only as long as advocates are willing to work with and not against the government. As an example, the day-off policy change enacted in 2013, that made compulsory a weekly day-off for all domestic workers, was the result of a ten-year campaign and efforts on the part of three civil society organisations accepting to work with the government for the well-being of domestic workers. Thus, change is possible through collective organization, but collective action is not an easy and quick fix solution to the lack of protective labor laws for domestic workers in all contexts.

2.3.2 Working definitions of domestic work and domestic workers

The definitions of domestic worker and domestic work devised by the International Labour Organization[3] (ILO) in the Article 1 of the Domestic Workers Convention, 2011 (No. 189) (ILO 2013, 8) offer perfectly acceptable and workable definitions, not too restrictive nor too broad. Using the ILO's definitions is also useful in practical terms for statistical information purpose. The working definitions of domestic work and domestic workers for the present thesis are thus similar to those adopted by the ILO, albeit the fact that they are focused on domestic work done freely by

[3] The ILO, "brings together governments, employers and workers of 187 member States to set labour standards, develop policies and devise programmes promoting decent work for all women and men" (https://www.ilo.org/global/about-the-ilo/lang--en/index.htm)

female domestic workers. In the present thesis, the term 'domestic work' refers to work performed freely in or for a household or households on an occupational basis by female domestic workers. The term 'domestic worker' refers to a female person engaged in domestic work on her own free will within a formal or informal employment relationship, that is with or without a written contract and with or without an employer-employee contributions towards some form of social protection coverage (pension, unemployment, healthcare, etc).

In the present thesis, similarly to the ILO definition, the definition of domestic worker excludes a female person who performs domestic work only occasionally or sporadically, that is for whom paid domestic work is not done on an occupational basis; it also excludes care givers in orphanages, kindergartens, hospitals and old-age residences, and does not apply to foreign brides, sex workers, nuns, or skilled migrant workers such as nurses or teachers working in an institutional context, who are governed by other immigration or labour laws. In general, paid domestic work done in the private sphere of a home may include such tasks as cooking for the family, cleaning the house, doing the laundry, caring for infants and toddlers, walking or driving children to school, washing the family car, and even taking care of the household pet. According to the ILO, "exploitation of domestic workers can partly be attributed to gaps in national labour and employment legislation, and often reflects discrimination along the lines of sex, race and caste" (ILO 2020). The national labour legislation is precisely what the present thesis aims to examine in order to determine the extent to which labour policies are responsible for the precarity of domestic workers in Singapore and Argentina.

Chapter 3 Theoretical framework of the thesis

As mentioned previously, in this thesis, I aim to highlight how the concept of precarity intersects with the labour policies adopted by each state to regulate the domestic work sector within their borders. Therefore a brief discussion relating to the concept of precarity is necessary before presenting the theoretical framework developed to support my thesis according to which the labor policies put in place by the authorities in Singapore and Argentina contribute to the precarity experienced by domestic workers whose working conditions they aim to regulate.

3.1 Developing the theoretical framework of the thesis

Precarious work is not new for countries in the Global South, and various authors have argued that the neoliberal economic model in place since the 1990s has normalized precarious work in all economic sectors worldwide, increased the fluidity between formal and informal work trajectories (Elbert 2018, 59), and diminished the rights of workers everywhere (Hewison and Kalleberg 2012, 400; Hardy 2016, 265). The effects of neoliberalism are particularly serious in states where a social net is absent (World Bank 2018), which is the case in most Global South countries.

3.1.1 Precarity within a discussion on domestic work

Precarity is a concept of interest for social scientists, but, for female domestic workers, precarity is embedded in the reality of their living and working conditions. Precarity can take different forms and degrees and not all domestic workers experience severe or extreme forms of precarity, but all experience some forms and degrees of precarity. What exactly is meant by saying that precarity can take a different forms and degrees? Lazar and Sanches have investigated the matter by documenting the strategies, histories, and experiences of workers from different world regions, among which South and East Asia as well Latin America. The authors demonstrate the importance of labour politics embedded in workers' daily life and their significance for those living in precarious conditions (2019, 4). The term *précarité* was used by French sociologists in the 1970s, such as Bourdieu, to describe the social condition of poor people, but it came to be used later on to describe the "new employment forms of precarious work outside the classic Fordist version of full-time permanent contracts" (Lazar and Sanches 2019, 4). According to Lazar and Sanches, in the 2000s, the precarization of work, the insecurity and uncertainty of employment, and the rolling back of the welfare state became a new reality for many workers and families of the Global North, a reality already well-known to workers and families in the Global South where "neither thewelfare state nor secure waged labour had ever been widespread enough to constitute such normative objects of desire" (2019, 5).

As noted by Marin, precarious work can exist with or without a legal work frame relationship (2013, 154). Singapore represents a case in hand, whereby a contract is signed, the domestic worker receives a formal work permit that entitles her to stay and work in Singapore, and her presence in Singapore is known to the authorities. Yet, these measures do not put an end to the risks of precarious work conditions as attested by the many reported cases of abuses and exploitation, as shown by Huang and Yeoh (2015, 176). Furthermore, the scale, versatility, and complexity of precarious work makes it a major problem in part due to the ambivalent behavior of

the State that tolerates indiscriminate use of fixed-term employment contracts, employment at the margins of labor law or public service provision, or triangular arrangements (e.g. recruiting agencies) reducing labor rights for workers (Marin 2013, 155-158). The case of Argentina authorities' tolerance for informal work exemplifies this ambivalent behavior that contributes to domestic workers' precarious work conditions. Marin adds, as another factor that makes precariousness a universal phenomenon, the transnational migration of individuals willing to offer their services in another country at a lower cost and in sectors that nationals are unwilling to fill (2013, 161), as illustrated by the migration of female domestic workers in Singapore and Argentina.

Vosko's defines precarious work as one characterized by "uncertainty, instability, and insecurity of work in which employees bear the risks of work (as opposed to businesses or government) and receive limited social benefits and statutory entitlements" (Vosko 2010 in Kelleberg and Hewison 2013, 271). Such a definition is highly compatible with the type of precarity experienced by domestic workers in Singapore and unregistered workers in Argentina. Betti argues that the experience of uncertain, unstable, and insecure working conditions is such it "has become one of the main social issues worldwide, particularly for younger generations, less protected workers such as migrants, and the female workforce" (2018, 273). Domestic workers, both in Singapore and Argentina, can fit well into these categories of workers as they are almost always women, generally young, often migrants, and workers denied of the same social rights and protection offered to all other workers. Furthermore, precarity does not only affect the domestic workers themselves, but also their families and communities who constitute what Yea calls a "secondary precariat"[4] due to the rippling effects of the economic vulnerability of migrant workers" (2019, 553), adding another layer of precarity and suffering to the already most disadvantaged segment of the Global South population.

The state of Singapore uses the flexibility argument to support its refusal to establish a minimum wage policy in domestic work, that could alleviate domestic workers' economic precarity, arguing that the supply and demand is a better way to manage the domestic work sector than a minimum wage policy. When the supply is high and the demand is low, the employer has more leverage and is confident that his/her offer of low wages will be taken up; when the demand is high and the supply is low, the domestic worker has more bargaining power to ask for higher wages. In the Southeast Asian region, the demand for domestic workers is high in wealthier countries and the supply of domestic workers from poorer countries willing to migrate to fill the gap is abundant, so employers generally have the upper hand to negotiate wages to their advantage with potential domestic workers. Because of the abundance of the supply, there is always someone else willing to take the job for less money (Pereyra 2019). Thus, I would argue that the law of supply and demand rarely works to the advantage of the domestic workers, both in the Singapore and Argentina contexts.

Flexibility can also mean that the employer may end the employment relationship for any reason if his/her need for a domestic worker no longer exists or is no longer convenient. By making the employer-domestic worker relationship based on a short two-year contract, the Singapore

[4] For Guy Standing, the precariat is a class in emergence that lacks several forms of labour-related securities and shares experiences of anomie, anxiety, alienation and anger (2011, 19).

authorities ensure that the work relationship remains temporary. In fact, the employment relationship can be ended at any time to fit employers' changing needs, taking little notice of domestic workers' own needs. The flexibility argument also allows the Singapore authorities to support and maintain its hands-off approach and unwillingness to get directly involved in matters of work arrangements between employers and domestic workers (e.g., rest periods during the day, minimum wages, accommodations, etc.). The government considers it is preferable to let working arrangements be negotiated privately between the employers and the domestic worker.

The reality and experience of precarity will vary with one's class, gender, nationality, race and "one' s social position, itself the outcome of overlapping structures of power and domination", as noted by Masquelier (2019, 149). For example, in Singapore, the Chinese male university-trained technician and the Indonesian female domestic worker will not experience precarity in the same manner when faced with the termination of employment. The former rests assured to eventually find another work because of his high social and human capital as where for the latter, her status of a foreign domestic worker of a low socio-economic background offers few options. According to Motakef (2019), gender needs to be considered as women are differently affected by precarity than men. The author argues that because women's care work is largely unrecognized and undervalued and because the aspect of recognition is tied to work, losing one's work means also losing one's hard-won recognition as a worker (Motakef 2019, 157). While considered a useful worker to her family and nation when working abroad, Constable notes that the repatriated Indonesian domestic worker loses her status of a valorized independent worker, may face criticism and shame, gendered and familial pressure and return to her subservient status within the family (2015, 150).

3.1.2 Introducing the notion of precarity of life of arrangements

Mona Motakef introduces the notion of precarity of life arrangements as "an insecure and high-risk condition, which encompasses not only the destabilized individual and family life, but also the loss of agency and the ability to make future plans" (Motakef 2019, 160). The concept is meant as a tool to capture the various dimensions of social life such as income, employment, education, health, housing, care, social network, and social welfare. Its interest lies in the fact that precarity is presented not only in terms of employment versus non-employment or loss of employment, but it incorporates "the destabilizing and stabilizing effects of employment and further dimensions such as love, but also care, health, rights and participation" (Motakef 2019, 169). Such dimensions affect domestic workers' lives especially in the case of migrant workers isolated and separated from their familial and social support groups. I borrow Motakef's notion of precarity of life arrangements and consider not only the economic dimension of precarity, but as well the affective and social dimensions of precarity. Although I will not always use the term 'precarity of life arrangements', Motakef's notion of precarity of life arrangements has been extremely useful in helping me to develop a generic chart of the dimensions and sub-dimensions of precarity (Chart 1). Using his concept of precarity of life arrangements, I was able to devise a theoretical framework enabling me to assess how state labour policies regulating the domestic work sector in Singapore and Argentina contribute to the various dimensions of precarity of domestic workers within their respective territory.

3.2. Charting the dimensions and sub-dimensions of precarity

The above discussion has brought to the forefront the three main dimensions of precarity which I identify as economic precarity, affective precarity, and social precarity. As I examine laws, policies, and regulations that govern the domestic work sector in both Singapore and Argentina, sub-dimensions of precarity are also likely to be identified. Sub-dimensions are factors that contribute to each of the three dimensions of precarity. For example, the economic precarity is due the insecurity and uncertainty of employment, low wages, limited work rights and entitlements and the asymmetrical work relationship. I present below a generic chart of the possible dimensions and sub-dimensions of domestic worker's precarity that will constitute the theoretical framework against which I will assess the laws, policies, and regulations put forth by the State in Singapore and in Argentina to examine the extent to which domestic workers' precarity is state-induced, meaning that state governance of the domestic work sector contributes to the inducement or exacerbation of the various dimensions of precarity experienced by domestic workers.

Chart 1 Generic chart of the dimensions and sub-dimensions of precarity

Dimensions of precarity	**Sub-dimensions of precarity**
1) Economic precarity	a) Insecurity and uncertainty of employment b) Low wages c) Limited work rights and entitlements d) Asymmetrical work relationship
2) Affective precarity	a) Isolation from support groups b) Loss of control over one's life c) Self-worth depreciation d) Feeling of disempowerment
3) Social precarity	a) Limited social security rights and protection b) Social and legal exclusion c) Political and associational exclusion d) Gender and social discrimination

The generic chart will adapt itself to reflect the specificities of the governance of domestic work in each state and facilitate a comparative analysis between both countries. Before examining how the labour laws intersect with the dimensions of precarity in each state, I proceed with a brief historical and statistical analysis of the domestic work sector at the national level of Singapore and Argentina.

Chapter 4 Domestic work in a historical and statistical perspective

Chapter 4 develops a concise history of domestic work and draws a historical parallel between the political, social, and economic development and the evolution of the domestic sector in Singapore and Argentina. The second part of the chapter paints a statistical picture of the domestic work sector in Singapore and Argentina.

4.1 Contextualizing domestic work in a historical perspective

This historical perspective is helpful to understand how states have come to regulate the domestic work sector and, as such, have affected and still affect today the levels and forms of precarity experienced by domestic workers. Within the transformation of Singapore and Argentina, domestic work as remained a constant, yet adaptable to fit the needs of different times and peoples. The decline and disappearance of paid domestic work, especially for live-in arrangements, was assumed by scholars who based their prediction on the "household modernization, social progress, and development of the welfare state" (Sarti 2015, 25). In North America and Europe, public subsidized child care and elderly care allowed women to work outside the home without having to rely on paid care work done within the household, but as Teo asserts, many states in Asia have an aversion toward universal welfare and prefer the familial valorization of housework and people care (2013, 38). In the new millennium, domestic workers are in demand as shown by the increase of 20 million domestic workers worldwide between 1995 and 2010, according to ILO statistics (2013, 24). This is a reality in wealthier countries of the Global South, in particular in Latin America and Asia, where "low wages paid to migrant domestic workers reflect and reinforce the global division of labor" (Meerkerk 2017, 232). However, domestic work has gone through multiple transformations, such as the preference for live-out arrangements when possible, the use of recruiting agency to facilitate the placement of domestic work abroad, the migration of married women leaving their children and husband behind and migrating on their own in search of a better future for their families, and the growing importance of remittances in the gross national product of sending countries (Meerkerk 2017, 239). Looking into how Singapore and Argentina have integrated the domestic work sector within their respective economic, political, and social development through time is now given some space.

4.1.1 A parallel history of domestic work and development of Singapore

To acknowledge modern Singapore's economic success strictly on its hard-working citizens and visionary leadership is to neglect the contribution of an important part of the labour force that is "paradoxically described as the 'invisible backbone' of many metropolitan economies in which they are found", as rightly noted by Huang and Yeoh (2015, 167), namely foreign female domestic workers and male construction workers. In fact, the presence of domestic workers is a ubiquitous reality in the city-state. They are seen strolling in company of young children or elderly people, doing errands and grocery shopping, washing their employer's car, walking the dog in wealthier neighbourhoods. They are migrants from Indonesia, the Philippines, Myanmar or Vietnam. They are in Singapore on a temporary work permit to "fill the care vacuum created when citizens are unwilling or unable to take on this work" [...] "that is undesirable and low-level service work" (Huang and Yeoh 2015, 167).

Frost and Balasingamchow tell the story of the island-state of Singapore, located at the very southern tip of the Malaysia peninsula, whose history is believed to have started in the 14th century, according to the first Chinese record that identifies the island as *Longyamen* or Dragon Tooth Gate; around 1350, it was referred to as *Temasek*, a Javanese name in reference to a land surrounded by water that became a vassal state of the Java's Majapahit court; it was later to become *Singapura*, or the Lion City, although there were never any lions in Singapore (2009, 14). By the early 15th century, Singapore was already a cosmopolitan island where Chinese, Javanese, and Siamese traders sejourned and perhaps even settled (Frost and Balasingamchow 2009, 17). Archeological findings allow scientists to establish that the pre-colonial society was divided in three social groups: the aristocracy, the freemen paying taxes and tributes to the rulers, and, at the bottom and largest portion of the island population, were the bonded servants and slaves "who had no freedom of movement, were owned as property by others and could be bought or sold" (Frost and Balasingamchow 2009, 21).

At the start of the colonial period, with the arrival of the first Europeans in the region, tremendous changes took place for the small island of Singapore. In 1819, when Sir Stamford Raffles, an employee of the British East India Company, took possession of the island, there were only about 1000 inhabitants on the island. In 1826, the East India Company regrouped Singapore, Penang, and Melaka into the Straits Settlements (Church 2006, 143) inhabited at the time mainly by Chinese people and a minority of native Malay and indigenous nomadic sea people (or *orang laut)* (Frost and Balasingamchow 2009, 37). At the time, males were found in much greater numbers than females since it was mainly young adult men who left their families back home to find fortune in the emporium's unregulated commercial development (Frost and Balasingamchow 2009, 90).

By 1871, Singapore had close to 100,000 inhabitants and, by 1897, the population had doubled and was divided between the haves, the colonial visitors and Asian bourgeois, and the have-nots, the coolies (rickshaw drivers), prostitutes, the poor and the sick (Frost and Balasingamchow 2009, 133). In 1860, the men to women ratio was fourteen to one, and the ratio remained extremely low till after World War I. Among the women who did come to Singapore during the colonial period, about 2000 were Japanese prostitutes - *karayuki-san*. They were oftenpoor farmers' daughters sent abroad to help financially their families, but who fell into prostitution for lack of better occupation choices. The official abolition of prostitution was declared in 1921 (Frost and Balasingamchow 2009, 161).

Male and female domestic workers were hired through long-distance network connections from their communities of origin (Hoerder 2015, 91). Wealthier families, generally Chinese or Peranakan, hired *Hylam* cooks and houseboys, Indian nurses (*ayahs),* and Indian waswhermen (*dhobis),* Chinese servants (*amahs* and *mui tsais)* (Huang and Yeoh 2015, 168). The washermen *dhobis* in Singapore were brought on the island in 1819 by the British to serve Indian soldiers (*sipahis)*. The Chinese black-and-white servants and nurses called *amahs* (or *ma jie)*, recognizable with their long hair in a braid or tied in a bun, white *samfoo* (tunic) and black baggy trousers, worked as domestic servants for the wealthy families in Singapore doing the cleaning, cooking, taking care of the children with whom they entertained close and affective ties (Frost and Balasingamchow 2009, 205). *Amahs* were mostly hired by British colonists and Chinese merchants living in Singapore (Kashyap 2015, 354). Hiring lower-class women symbolized wealth and status

in Singapore's colonial society, and, for poor women, domestic work was an acceptable means of economic survival. Households that could afford outside help continued hiring domestic workers until 1945. Except for the Chinese wealthy families who kept *amahs* to care for their children till the end of the war, middle-class families hired young local girls and women from rural areas of the island as servants and laundry women, according to Huang and Yeoh (2015, 168).

Following the independence of Singapore in 1959 and the departure of British families, many *amahs* returned to China while other younger ones stayed on to find job in the factories and were replaced eventually by rural Indonesian women in the 1970s and 1980s (Kashyap 2015, 358). Following its separation from the Federation of Malaya in 1965, the history of Singapore becomes tied to one man, Prime Minister Lee Kuan Yew and founder of the People's Action Party (PAP), who remained politically active from 1959 to1990. When the People's Action Party (PAP) took hold of power in 1959 under Lee's leadership, the state embarked on the nation-building process of its multi-ethnic, multi-linguistic, and multi-religious population. The PAP launched a major industrialization program to make up for the declining entrepot system and aimed to provide decent housing, medical, and educational facilities and opportunities to all of Singapore citizens (Völgyi 2019, 277). State-owned companies became the most important tools of the developmental state in its first phase of the economic state capitalism, according to Völgyi (2019, 278).

In the 1970s, Singapore's major industrialization push created employment opportunities in the manufacturing and service sectors for low skilled male and female workers and depleted the pool of local young women interested in domestic work. As a result, the growing number of dual-income families faced a shortage of outsourced labour for their childcare and household work needs (Iyer et al. 2004, 11). Teo (2013) explains how the state of Singapore, under the PAP government, has developed an effective anti-welfare familialist rhetoric to limit the state expenditure in welfare child or elderly care service provision. However, recognizing the need to encourage well-educated middle and upper-class women to participate in the industrialization efforts, the state turned to foreign domestic labour and granted a limited number of temporary work permits to young Thai, Sri Lankan, and Filipina women in a first phase (Huang and Yeoh 2015, 168). The *1978 Foreign Maid Scheme*, a temporary solution, has since then become a well-established system of foreign maids entering the country on a temporary work permit tied to a specific employer and subjected to a series of strict regulations and limited rights and protection to answer the reproductive work needs of dual-income families.

Since 1991, legislation is strategically devised to ensure that domestic workers go back home at the end of the two-year contract that can nevertheless be renewed following a mutual agreement between the employer and the domestic worker. Singaporeans entertain an ambiguous relationship with the presence of a high number of domestic workers in their small city-state, or even of foreigners in general. As Baker explains, since the 1990s, the backlash against the rapid increase of low-skilled foreign workers and high-skilled foreign talents are perceived to cause disquiet, congestion of public areas and transportation, non-observation of Singapore's social norms, and competition for work (2014, 408).

By scrutinizing the quality of authoritarian rule and its continuity in Southeast Asia, and by devising a typology of authoritarian regimes in the region from retrograde to sophisticated, Morgenbesser concludes that among the eleven countries of Southeast Asia, only Singapore is a

true case of sophisticated authoritarianism (2020, 59). Morgenbesser's assertion is based on the fact that, since 1959, each of the three leaders at the head of the PAP government has aimed to mimic the attributes of democracy, liberalism, majoritarianism, and participation to the point that it is seen as a model of authoritarian regime due to its economic strength, minimal corruption, institutional configuration, information apparatus, and international conduct dimensions (2020, 60). However, it is also the very same authoritarianism that limits advocacy in the city-state. The few authorized civil society organizations (CSOs) that advocate for better working conditions for domestic workers have had to develop original strategies of working with the state to advance the cause of those they represent.

Acknowledging the displeasures of its citizens with the important inflow of migrants on its tiny territory, Teo explains how the PAP government appears to have appeased its citizenry with the explanation of how the low fertility rates of Singaporeans creates Singapore's dependency on migrant labour and presents the immigration of foreign domestic workers as Singaporeans' only solution to their care deficit if they wish to continue to prosper economically (2013, 387).

4.1.2 A parallel history of domestic work and development of Argentina

Before their independence, former Spanish colonies in Latin America were governed for 300 years "by a highly centralized, albeit cumbersome, bureaucracy in which all important political and ecclesiastical positions were held by appointees from the mother country" as described by Shumway (1993, 3). The Creoles, or first colonists and their descendants (*criollos*), mostly acted independently from imperial decrees out a feeling of liberty and accepted disobedience that the distance from the central authority permitted (Shumway 1993, 3). Independence movements grew stronger across the Spanish colonies of the Americas in the early 1800s, and new nations were formed when civil wars broke the four viceroyalties of Spanish America into eighteen republics with new boundaries, names, and governments facing demanding nation-building processes since no 'ready-made myth of national identity' united inhabitants under a common ideology (Shumway 1993, 4). Among the Creoles, two different classes formed early on: the ruling classes of "more Spanish than the Spanish" and the common people who developed a sense of peoplehood and localness (or *localismo)* governed by charismatic individuals (or *caudillos*) that became the symbol of authority within various small areas (or localities) (Shumway 1993, 5) and will result in civil wars among creoles, factions among elites, and conflicts between inland and littoral areas of Argentina following the Independence in 1810.

From 1700 to 1750, pre-independence Argentina was a fragmented land of small settlements interconnected with poor infrastructure and distant from Buenos Aires and the littoral region. In 1776, the Viceroyalty of the River Plate was created under economic pressure, with Buenos Aires as the main city of *libre commercio* activities (free port), but only to give way to numerous conflicts between inland local settlements and the littoral. Hoerder argues that Spanish seafarers and migrants bringing with them their conception of gender relations replicated the patriarchal household in the colonies with the same social control and juridical identity found in the motherland (2015, 80). Black and Indian slaves as well as Spanish servants were found in various numbers within households depending on the family's wealth (Hoerder 2015, 81). Spanish women were kept under tutelage of the husband-father household head and even lower-class women were restricted to domestic labour (Hoerder 2015, 81).

During the colonial period, specialized skills were required for certain tasks (wet-nurse, nanny, kitchen help, seamstress, etc.) as where other "dirty" tasks were given to less skilled or younger servants learning the trade of domestic work. Indian women entered into the service of Spanish families for lack of employment in their villages despite the fact that they were basically enslaved, prevented from marrying, and their whole bodies put to use, including providing sexual services to the male master; their illegitimate children of mixed race, *mestizos* classified as *castas*, became the next generation of servants, according to Hoerder (2015, 82). After the abolition of slavery and the slave trade, their status changed but not their basic condition: they had to remain under the authority of a master as did the white female servants, who had followed their employer to the New World or who had come on their own (Hoerder 2015, 83). By the 1900s, the numbers of slaves had remarkably decreased (Hoerder 2015, 83).

Donna J. Guy (1981) draws a most interesting picture of the evolution of women's work in Argentina from 1810 to the 1920s, as an historical example of how women were affected by modernization and industrialization and how domestic work became a work opportunity for many low skilled women. In 1810, women were involved in cottage industries that grew in great number in the north, west and center of the provincial economies to answer trade demands (Guy 1981, 66). Cotton, woolen, and fur garments as well as food products, made by slaves in workshops or by women of different classes in their homes in the Argentine interior, were sold to Bolivian miners, whereas the less populated and more pastoral coastal areas were deprived of such women's activities and products (Guy 1981, 66). However, the introduction of British textiles, facilitated by the construction of the railroad, brought an end to this form of cottage industry work in the 1850s (Guy 1981, 68).

Some women, accused of vagrancy or crimes were put to work on public projects, in the making of cottage industry products, or as domestic servants under a peonage system[5] supported by the enactment of anti-vagrancy laws, labour contracts and involuntary service due to indebtedness (Guy 1981, 69). Vagrancy laws pushed women into domestic work, asserts Hoerder (2015, 84). Women of lower classes, through the peonage system, became domestic servants for ranchers and while women of middle or upper classes were not submitted to the peonage system, even if they had acted against the law (Guy 1981, 69). As Guy notes, the peonage system was also a means of regulating women's morality, especially because of the high numbers of female ex-slaves in the interior cities during the wars of independence. The enactment of the anti-vagrancy law, the forced labour law, and the anti-prostitution legislation of the 1830s were all meant to govern the behavior of women, restrict child labour, and encourage women to work to compensate men's absence gone to work on the littoral where work opportunities were better (Guy 1981, 70). Colonial traditions and the role of the Church were influential in the interior provinces where public female conduct was closely monitored. It was felt that poor women's morality was easier to control when working as domestic servants in private households (Guy 1981, 71). Although not truly enjoyable, the situation of domestic workers in the interior provinces was still preferable in

[5] Peonage: the use of laborers bound in servitude because of debt or a system of convict labor by which convicts are leased to contractors (https://www.merriam-webster.com/dictionary/peonage).

1869 to the littoral's poor women who worked as laundresses, seamstresses, or maids for less money, if work was at all available (Guy 1981, 72).

The industrialization period of 1875-1914 transformed the physical, social, and economic landscape of the Argentina's littoral region, principally in Buenos Aires. The expansion of farmland, made possible with new machinery for threshing and plowing the land, converted Argentina from a grain importer to a main world producer and exporter of cereals (Guy 1981, 76). The interior lost its predominance in grain production within Argentina and the previous female work opportunities in agriculture were lost as the priority was given to male productivity using the new machinery. The low demand for female labour in the agrobusiness was compensated by the demand for working-class women in new business opportunities in the developing urban littoral. The production of food, cigars, clothing, jute-soled canvas shoes, burlap bags, shirt and hats, tailer shops, and commercial laundries offered the working-class women job opportunities (Guy 1981, 77). Many worked from their homes, worked by hand, and were paid by the piece, thus performed strictly nonmechanical tasks, so much so that they were quickly replaced when new machines and male technicians took over their manual tasks (Guy 1981, 77). Female workers then turned to domestic work, and, by 1895, their number had doubled in Buenos Aires as higher numbers of native and foreign women integrated the domestic work sector (Guy 1981, 78). Others were channeled into women's jobs as washerwomen, ironers, laundresses, and cooks.

By 1914, the declining cottage industry became unable to compete with imported industrial goods; women of the interior unwilling to migrate to the littoral preferred to work in low-status and poorly paid jobs as laundresses, ironers and maids; meanwhile the situation had improved in the littoral cities and jobs as maids were easy to find as more and more European families migrated to Argentina (Guy 1981, 72). As more European immigrant women came to Argentina, they gradually surpassed numerically the native women labour force in all female employment in Buenos Aires, including the domestic and maid work (Guy 1981, 78). In the modern economy of the 1920s, women turned to domestic work in the expanding cities of the coastal region since they were not integrated into the technological part of the modernization process (Guy 1981, 80). In fact, the industrial labour legislation, aiming to protect industrial female laborers from exploitation, abuse and dangerous working environments, discouraged the expansion of industries based on female labour. However, domestic workers did not have the same protection against dangerous or abusive working conditions. For example, factory workers were given a legal Sunday day-off but this did not apply to domestic servants. In fact, in 1918 the government passed a "national home work law that excluded from inspection conditions of household service, as well as any place where family members constituted the work force supervised by another relative" (Guy 1981, 84). The roots of the poor working conditions of domestic workers may thus be traced back to this century old legislation giving primacy to home privacy over domestic workers' working conditions.

In the 1920s, domestic service was a sector that employed Afro-Argentines in great numbers since the abolition of slavery in Argentina in 1813 and emancipation programs of slaves created a shortage of domestic workers (Andrews 1979, 23). Confronted with racial discrimination and the arrival of large numbers of European immigrants between 1870 and 1914, Afro-Argentines retreated in the end in the only sector that was left opened to them: domestic work (Andrews 1979, 25). Their descendants form part of today's domestic work force.

In Argentina, as in other Latin American states, migrations patterns went through important transformations in terms of gender and ethnicity, and the year 1915 marks a turning point with the end of World War I. As Jelin recalls, before 1915, migration was a man's thing as male external migrants, mainly from Spain, arrived in Argentina's capital as young single men or married men leaving behind wife and family to come to Argentina in search of work. After 1915, female migration became predominant as young Argentine women looking to escape the rural areas and discover a more exciting life in urban areas (Jelin 1977, 130). Urban pull factors, such as work in factories and a stimulating city life, were difficult to resist in the face of push factors caused by rural crises and high rates unemployment, despite the high risks of residential, economic, social and political marginalization and deceived dreams (Jelin 1977, 130).

In the cities of 1900 to 1950, the need for servants had diminished with smaller families and new household technology, but the symbolic status attached to the employment of servants for upper-class households remained and became highly feminized (Hoerder 2015, 83). By 1960, a majority of the population of the Latin American countries lived in cities of more than 100,000 inhabitants (Jelin 1977, 130). Since factory work and industrialization did not provide enough jobs for the lowly skilled male and female rural workers settling in cities, a great number of them entered into the service sector (Jelin 1977, 130). In the 1970s, the number of migrant domestic workers surpassed the number of native domestic workers in the Argentine capital city. Some may have remained employed in the domestic work sector for their whole active life as where other may have married or moved into other sectors of activities. Some married women, other than performing house tasks for their family, worked on a part-time or irregular basis sewing or mending clothes, taking care of others' children, performing domestic tasks informally for others to earn extra money if the husband's income is not sufficient. As Jelin summarizes, "The fluidityof the informal labour market for domestic servants allows for the existence of women who can enter or leave part-time paid employment as a simple extension of their domestic subsistence tasks" (1977, 136). Already fifty years ago, informal domestic work was socially well-accepted and widely used as a secondary income alternative for married women.

4.2 A statistical perspective of domestic work

This section draws heavily from the findings of the ILO 2013 report *Domestic Workers across the world: Global and regional statistics and the extent of legal protection*, which compiled and compared data from a broad range of 117 countries (ILO 2013, 7). In 2010, close to 53 million men and women were employed as domestic workers worldwide according to the ILO estimates (2013, 20), supporting the fact that domestic work is an important source of employment that accounts for 1.7% of total employment worldwide, showing a particularly growing importance in developing countries (ILO 2013, 19). Asia and the Pacific (AP here forth) represents 41% of all domestic workers and Latin America and the Caribbean (LAC here forth) 37%, which means that those two regions represent more than three quarters of all domestic workers worldwide (ILO 2013, 24). A cross-national analysis of 74 countries brought Jokela to conclude that globally modernization did not bring about a decrease in the use of domestic workers, income inequality is a factor of prevalence of paid domestic work in the total employment, migration is an important driver for paid domestic work, and the level of urbanization is positively associated with the prevalence of paid domestic work (2015, 396).

4.2.1 A statistical perspective of domestic work in Singapore

Any study on domestic work in Singapore is linked to the feminization of migration since, in Singapore, all domestic workers are female foreign workers having migrated from their country of origin to the island-state with one prospect in mind: to work as a domestic worker in one of the five households of Singapore citizens, permanent residents or temporary expatriates. From 1960 to 2000, Malhotra et al. (2016) find that over time women's migration has changed, has increasingly diversified, and, that in the precise case of Singapore, most women come from Bangladesh, China, Hong Kong, Indonesia, Malaysia, Philippines, Thailand, Sri Lanka, and India. Malhotra et al. studied the evolution of the percentage of women migrants among both female and male migrants to Singapore from major Asian sending countries from 1960 to 2000 (2016, 130). They find that women from a variety of countries attracted to Singapore between 1960 and 2000 remain largely influenced by the geographic proximity factor.

From the previous section on the historical evolution of domestic work in Singapore, it has been observed that between the 1930s and 1960s, finding and employing domestic workers was under the responsibility of wealthy families who turned to kin and friendship networks to find the best possible *amah* for their childcare needs or servants to help out with the household chores. By the 1960s, most *amahs* left when Singapore became an independent state. With the push for industrialization, local unskilled women preferred working in factories than to work as live-in domestic workers. In 1978, the state of Singapore officially promoted the migration of women from neighbouring countries to be employed as domestic workers to support dual-income families (Jung 2016, 107). Since then, the number of foreign workers grew steadily with the economic development of the city-state. Yang et al. note that in 2016, among 5,61 million population of Singapore, 61% were citizens, 9% were Permanent Residents (PRs) and 30% were non-residents (skilled, semi-skilled and unskilled foreign workers). Among the 30% of the non-residents, 14% were domestic workers (Yang et al. 2017, 10). One way of measuring the number of domestic workers in Singapore is to look at the numbers of Work Permits granted to domestic workers by the Ministry of Manpower (MOM). The number of domestic workers grew from 5000 (1978), to 50,000 (1990), 140,000 (2002), 180,000 (2009), 222,500 (2014), and 261,000 (2019). The numbers have thus grown consistently since 1978, indicating the growing and deepening dependence on domestic workers of Singapore citizens and PRs for their care work needs.

4.2.2 A statistical perspective of domestic work in Argentina

In Latin America, one out of four female wage workers is a domestic worker (ILO 2103), and numbers are probably underestimated if the level of informality is thrown into the equation. In 1998, a study of the *Los Medios y Mercados de Latinoamerica* indicated that 2.3% households had one or more live-in domestics and 9,2% employed day domestics (Soong 2000). The 1998 study comes to interesting conclusions that still apply twenty years later: the likelihood of a household to have one or more domestic workers is a function of the socio-economic level of the household; there is a positive correlation between the level of education of household heads and their annual income with the employment of domestic workers; when both adults have a full-time job, the likelihood of having a domestic worker increases; and households with labour-saving technology are more likely to hire domestic workers because they can afford both the technology and the domestic worker (Soong 2000).

As was the case with Southeast Asia, domestic work in Latin America is also intertwined with the migration of women leaving rural areas, poor urban neighbourhoods or their country of origin for urban areas, richer urban neighbourhoods or another country of destination looking to integrate the domestic work sector. According to Faur and Pereyra, care work was traditionally seen in Argentina as a familial responsibility, mainly that of the women head performing her duties for free (2019, 26). Faur and Pereyra also find that the person who spends most of the day with children up to four years of age in Argentina (in 2014-2015 period) is the mother in 81% of the cases. The lack of public services hits especially hard low socio-economic families who cannot afford the privately run services, and therefore children of low socio-economic families under the age of two cannot attend education or care facilities, limiting their mothers' access to the labour market in general, full time employment in domestic work, or pursuit of education fulfillment. When necessary, they turn to informal part time work arrangements, at least until their children can attend state-run services for three and four year old children (Faur and Pereyra 2019, 28).

Esquivel's study of care workers in Argentina illustrates the importance of domestic workers within the wider care industry in Argentina in 2006 as domestic workers (45%) account for more than the combined other female professions in the care work industry (41%), such as professors, teachers, doctors, nurses, etc. Her study highlights the fact that early-education teaching and domestic service share certain characteristics: both are feminized sectors and related to the provision of care for children. Yet, they differ considerably in terms of regulatory framework, labour protection, working conditions, and locus of care provision (Esquivel 2010, 487). The individuals within each of the two groups also differ in their socio-economic background, education attainment, work experiences and employment prospects (Esquivel 2010, 487). Because of the low barriers to entry, domestic work offers job employment to young women of low socio-economic backgrounds but also to middle-aged women, among which 35% of heads of households; some are internal migrants (37%) or external migrants (20%) from estimates of 2006 (Esquivel 2010, 487).

The majority of domestic workers in Argentina are of the central age range of 45 to 54 years, which implies that domestic work represents an employment opportunity for women who decide to enter the labour market at an advanced age following familial changes (e.g., loss of income of their spouse due to illness or unemployment, death of a spouse, separation or divorce, expenses for children higher education, building of a house, etc.) (Mourelo 2020, 7). This may explain in part why many domestic workers prefer part-time for one or many employers and live-out arrangements. Mourelo finds that, in Argentina, domestic work involves about 1.4 million people in 2020 and is performed to the extent of 99.3% by women (Mourelo 2020, 7). Since the 1960s, most migrants in Argentina come from neighboring countries and no longer from Europe (Cortes 2017, 2). Courtis and Pacecca report that, in 2000, most migrant domestic workers in Argentina were from Paraguay, Peru, and Bolivia, with Paraguayan and Peruvian women finding work as domestic workers in Buenos Aires households, and Bolivian women in other areas of Argentina and other sectors of activities, such as agriculture, manufacturing and trade (2014, 26). Among migrant domestic workers, the number of registration increased between 2004 and 2013 from 11.1% to 30.4 % as a result of the migration law that encouraged the regularization of illegal immigrants (Cortes 2017, 12). Native domestic workers seem to resist registration more so than migrants who increased their registration rates between 2004 and 2013 from 6.4% to 19.5% (Cortes 2017, 12), perhaps to secure their prospect of a future Argentine citizenship.

Chapter 5 Labour laws and domestic work in Singapore

The present chapter of the thesis focuses on the labor laws, policies, and regulations put forth by the Singapore state to regulate the domestic work sector within its borders. My aim is to establish how these laws, policies, and regulations are linked to the precarity of domestic workers. As stated previously, my main hypothesis is that, despite their diverging objectives and implementation processes, the existing labor policies in Argentina and Singapore effectively contribute to the precarity of domestic workers by limiting their human and labor rights as well as their personal occupational choices and professional trajectories. A first part of the chapter will examine the labour laws, policies, and regulations relating to domestic work in Singapore found on the Government of Singapore Statutes website.[6] The second part charts the labour laws, policies, and regulations and their intersection with the dimensions and sub-dimensions of precarity experienced by domestic workers. A third part highlights the main findings.

5.1 The intersection of labour laws and dimensions of precarity of domestic workers

In Singapore, the national labour law, or Employment Act (Chapter 91) (EA thereafter), originally enacted in 1968, covers all employees, but specifically excludes domestic workers. The EA alsospecifically mentions that domestic workers and seafarers are not considered "employees" that is a person who has entered into or works under a contract of service with an employer (a household head is not considered an employer in this sense). Domestic workers, like seafarers, are also not considered "workmen" defined as any person, skilled or unskilled, who has entered into a contract of service with an employer in pursuance of which he is engaged in manual labour, including any artisan or apprentice.

5.1.1 Identifying the labour laws, policies, and regulations relating to domestic work

The domestic work sector is regulated by a separate labour act that offers limited rights and protection to domestic workers compared to regular workers. Domestic work is regulated by the Employment of Foreign Manpower Act (Chapter 91A) (thereafter EFMA) and the Employment of Foreign Manpower (Levy) Order 2011 (thereafter EFMO 2011). The preliminary section of Part 1 of the EFMA defines certain terms. I focus here on terms directly related to the domestic work sector. The term "domestic worker" means: "a work permit holder employed in or in connection with the domestic services of any private premises. A "holder" in relation to any S pass or work permit, means "the person to whom and in whose name the S pass or work permit is issued". "Work permit" means: "a work pass known as a work permit issued under the Employment of Foreign Manpower (Work Passes), Regulations, and includes a training work permit issued under those Regulations". A "foreigner" means: "any person who is not a citizen or permanent resident of Singapore".

Division 4 of Part III of the EFMA focuses on domestic workers and on the levy payable by the employer of a domestic worker. In Singapore, the employer does not have to pay contributions on behalf of the domestic worker to the Central Provident Fund (CPF) as he/she must

[6] Government of Singapore Statutes website: Singapore Statutes Online. https://sso.agc.gov.sg/

do for all employees regulated by the EA. The CPF is described on the Ministry of Manpower (MOM)'s website as a mandatory social security savings scheme funded by contributions from employers and employees; it is a key pillar of Singapore's social security system that serves to meet the retirement, housing, and healthcare needs of Singaporeans. The government supplements the CPF savings of lower wage workers through schemes such as the workfare scheme and supplements the Medisave scheme for senior citizens. Since domestic workers are not considered employees, they do not profit from such schemes, but the employer must pay a monthly levy to the government for each domestic worker he/she employs. The monthly levy, like the work permit, is a measure taken by the State to control the number of domestic workers allowed in the country.

The conditions referred to in sub-paragraph 2 (a) to (g) of Article 16 of the EFMO 2011 identify the employers who pay a low monthly levy of 60$ (or concessionary levy). The employer must be a citizen of Singapore residing at his registered address and who a) is 67 years of age or older; or b) has a child below the age of 16 years who is a citizen of Singapore and who resides with his parents at the registered address; or c) has a parent, parent-in-law, grandparent or grandparent-in-law who is a citizen of Singapore and residing at the same registered address as the employer; or d) has a certified disability, is a citizen of Singapore and resides at his registered address and for which the domestic worker is employed to provide caregiving assistance. All other employers, such as Permanent Residents (PRs) or those do not meet the above criteria, must pay a monthly levy of 300$ for the first domestic worker and a monthly 450$ for the second and any other subsequent domestic worker employed by the employer. In sum, by lowering the monthly levy cost, the government subsidizes Singaporean families responsible for a child or children younger than 16 years old or an older citizen of over 67 years of age with or without a disability.

If an employer does not pay the full levy on time, he/she faces the following penalties: to be charged a late payment penalty of 2% per month or $20, whichever is higher; the total late payment penalty will be capped at 30% of the outstanding levy; the helper's Work Permit (WP) will be revoked; the employer will not be allowed to apply for or be issued a new WP, or be able to renew an existing WP; the employer may face legal action to recover the unpaid levy. Thus, if an employer fails to pay the levy, the WP is revoked, and the domestic work is unable to remain in Singapore, may be repatriated home. Whether unemployed because of an unpaid levy or for other reasons, the domestic worker may be able to transfer indirectly to another employer with the help of an agency, having then to pay new fees to the recruitment agency. She may also be able to transfer directly to a new employer if the current employer accepts the transfer.

For all new domestic workers coming into Singapore to work or in the case of a renewal of the work permit with or without a transfer to a new employer, many steps must be carried out. The domestic worker must go through a medical examination which screens her for pregnancy and infectious diseases such as syphilis, HIV, and tuberculosis. This must be done every 6 months. In the case of a transfer of employer, the current employer signs the declaration form attached to the In-Principal Approval (IPA) letter given by the new employer or employment agent, confirming that the current employer agrees with the transfer. If the current employer does not agree to a transfer, the domestic worker cannot remain in Singapore, finding herself without a valid WP. It must be noted that the current employer has no obligation to go through the various steps allowing the domestic worker to remain in Singapore, in which case the domestic worker will be repatriated.

The current employer must wait for the new employer to issue her a WP. Once this is done, the current WP is cancelled, and the levy billing is stopped for the former employer.

The Employer's guide in reference to the employment of a foreign domestic worker (FDW) found on the MOM's website provides in finer details the regulations and procedures on hiring a domestic worker that result from state policies and laws.[7] I highlight here the main parts of the guide that explain the conditions of eligibility for the employer and domestic worker, the employer's responsibilities towards the domestic worker and the legal implications for the employer and domestic worker when regulations are not fully respected.

1) Criteria eligibility for domestic workers and employers:

Foreigners employed as domestic workers in Singapore must meet certain eligibility criteria:
- to be of the female gender; to be aged between 23 to 50 years at the time of the application (for a foreign domestic worker aged 50 and above, the renewal of the work permit is possible till the age of 60); to be a citizen from the approved source country, including Bangladesh, Cambodia, Hong Kong, India, Indonesia, Macau, Malaysia, Myanmar, Philippines, South Kora, Sri Lanka, Taiwan or Thailand; to have a minimum of 8 years of formal education with a recognized certificate. If the FDW is unable to produce acceptable educational certificates or any other official document, the MOM may refuse her entry into Singapore or repatriate her is she is already in the country.

The employer must also meet certain eligibility criteria to hire a foreign domestic worker:
- to be 21 years old and above; not be an undischarged bankrupt; have the mental capacity to fully understand and discharge the responsibility as an employer; must have the financial ability to hire, maintain and upkeep the foreign domestic worker in an acceptable accommodation; should not suffer from any medical condition that would impair his/her ability to exercise supervision and control over the well-being of the foreign domestic worker, such as Alzheimer, dementia, and schizophrenia. The employer must be mentally capable of supervising and closely monitoring the domestic worker during her stay in Singapore. This measure is said to ensure the well-being of the domestic worker.

2) Employer's obligations and responsibilities

A first-time employer must attend the Employers' Orientation Programme (EOP), which is a 3-hour programme aiming to help the employer understand his/her role and responsibilities as an employer of a FDW. The EOP can be taken either in the classroom or online, but it is recommended to attend the classroom EOP because the case studies and personal experiences shared in class is said to give a future employer a better understanding of how to work with the FDW to meet expectations [understood here as the employer's and MOM's expectations]. The EOP is also compulsory for any employer who has changed more than three (3) FDWs within a 12-month period and who wants to apply for another FDW.

The employer must also buy a medical and personal accident insurance (PAI) package to cover the domestic worker while she is in Singapore since she will not be covered by any other

[7] https://www.mom.gov.sg/passes-and-permits/work-permit-for-foreign-domestic-worker/key-facts

insurance. The PAI must be worth a minimum of S$15,000 per year for inpatient care and day surgery during the helper's stay in Singapore and must have a sum assured of at least S$60,000 per year to cover sudden, unforeseen, and unexpected incidents resulting in a permanent disability or death. If the employer fails to meet the health and insurance requirements, the domestic worker will be refused entry into Singapore and the employer will have to pay to send her home immediately.

3) Domestic worker's obligations

The first time FDW must attend a Settling-in-Programme (SIP). A first-time FDW is one who has never worked in Singapore as an FDW before. This includes an FDW who does not have an FDW employment record with MOM's Work Pass Division or who had an FDW employment record with the MOM but eventually did not work in Singapore. The domestic worker is only allowed to work for the specific employer that has sponsored her, and she can only do domestic chores, meaning work done within the compound of the home she is to reside in with her employer. She cannot work for someone else as a part-time work even on her day off, but she can take care of the employer's young child or elderly parents at another address during the daytime, if the employer desires. Disobeying these rules are costly for the employer and the FDW. For illegally deploying a domestic worker, the penalty is a fine of up to S$10,000. Convicted employers may also be banned from further employment of domestic workers. Employing a FDW without a valid WPincurs a fine between S$5,000 and S$30,000, or an imprisonment for up to 1 year, or both. For subsequent convictions, offenders face mandatory imprisonment.

4) Work Permit conditions

Regarding the WP, the conditions are strict and affect both employers and domestic workers. The FDW must be employed at the employer's home address as stated on the national registration identity card (NRIC), implying that only live-in arrangements are possible. The cost involved for each application submission are S$35 and another S$35for each pass received. The process takes between one to three weeks. The domestic worker must not be related to the employer and must not be in Singapore while applying for the WP. The domestic worker can only arrive after the employer has received the IPA letter.

The employer must buy a S$5,000 security bond. The security bond is a binding pledge to pay the government if either the employer or the domestic worker breaks the law or any of the work permit conditions as per the EFMA and EFMO regulations. The bond is in the form of a banker's or insurer's guarantee. The employer must buy a S$5,000 security bond for each domestic worker he/she employs unless the domestic worker is a Malaysian. The employer cannot ask her helper to pay for the bond. At the end of the employment relationship, the employer is discharged from the security bond liability only if he/she met all the conditions, that is he/she has cancelled the WP, the helper has returned home, and none of the conditions of the security bond were breached.

The employer must apply for the WP in the name of the domestic worker, providing the foreign domestic worker's passport details, the employer and his/her family members' personal particulars, and income information. Once the application is approved, an IPA letter is sent to both parties and declaration forms must be signed by the employer and the FDW. This letter will allow

the domestic worker to enter Singapore. The FDW's IPA particulars must match exactly her passport details, otherwise the domestic worker will be denied entry into Singapore. The employer must get the written consent of the domestic worker before applying for a WP to protect the interests of both parties should a dispute arise. This applies to all applications and renewals for all types of work passes. Any document is a written consent if it shows the foreign domestic worker's agreement to be employed by the employer. An example is a signed employment contract. There is no standard compulsory employment contract, but a verbal consent will not be accepted. The duration of the WP is up to two (2) years depending on the validity of the security bond and is renewable for another two (2) year period. It must be renewed before the WP expires and the employer must renew the helper's PAI package.

There is no minimum required for the qualifying salary and there is no minimum wage for a domestic worker's basic salary. The governments of the Philippines and Indonesia require their maids to be paid at least US$550 per month as of mid-2016 (HelperChoice). This means that Filipino and Indonesian domestic workers are assured of a higher starting salary than workers from Myanmar and Malaysia. The average salary of domestic workers in Singapore is about US$597. The employer can undertake a direct-hiring or go through an agency. If the domestic worker is employed through an agency, the MOM has limited to up to two (2) months of salary the fees that a Singapore agency can ask of domestic workers, but the Singapore government cannot control the fees demanded by agencies located in the domestic worker's home state. Some domestic workers must repay the fees as well as loans taken up from agencies, employers or family and friends for months, which means that they are left with no money for months until their debt is repaid.

5) Other regulations and rules

Once the domestic worker and the employer have satisfied all the WP conditions, there are more rules that they both must comply with. The employer must provide for rest days, proper accommodation, adequate medical care, and safe working conditions. To ensure that the FDWgets enough mental and physical rest, the employer should allow her to have a regular rest day. By law, since 1 January 2013, the domestic worker is entitled to a weekly rest day. It is left to the employer and domestic worker to mutually agree on which day of the week the domestic worker should take the rest day. To avoid disputes, both should have this agreement in writing. If the domestic worker agrees to work on her rest day, the employer must compensate her with one of the following: with one (1) day's salary, this being an additional payment, not counted into the domestic worker's basic salary, or with a replacement rest day taken within the same month.

In terms of accommodation, the employer must provide the following: adequate shelter that protects the domestic worker from environmental elements such as sun, rain or strong winds; basic amenities by providing the domestic worker with a mattress, pillow, blanket, bathroom amenities; sufficient ventilation by providing mechanical ventilation if natural ventilation is inadequate; for safety concerns, the domestic worker must not sleep near any dangerous equipment or structure that could potentially cause harm or hurt to her; for modesty concerns, the domestic worker must not sleep in the same room as a male adult or teenager. If a video recording device is installed at home, the domestic worker must be informed of the devices and their placement, and it should not be installed in areas that will compromise the domestic worker's privacy or modesty;

when possible, the employer should provide the domestic worker with a separate room. If that is not possible, her accommodation must provide adequate space and privacy.

The employer must provide the domestic worker with adequate food and three (3) meals a day and must be sensitive to the domestic worker's needs when it comes to food. He/she must not force her to eat food that she is not supposed to or is not comfortable with due to religious beliefs, or because she is unaccustomed to the employer's family's dietary requirements or tastes. The employer is responsible for the domestic worker's medical needs and must bear the full cost of any medical care, including hospitalization. The employer must ensure that the domestic worker works safely, for example by following the approved work practices stipulated in MOM's training materials and courses. Finally, employers who abuse physically or sexually or mistreat their domestic worker will face severe monetary and/or imprisonment penalties and be banned from employing another domestic worker.

5.1.2 Charting the intersection of the labour laws, policies, and regulations of domestic work with the dimensions of precarity for domestic workers

Chart 2 intersects the main labour laws, policies, and regulations with the dimensions and sub-dimensions of precarity experienced by domestic workers in Singapore.

Chart 2 Chart of the dimensions and sub-dimensions of precarity of domestic workers in Singapore

Economic precarity	Affective precarity	Social precarity
a) Insecurity and uncertainty of employment	**a) Isolation from support groups**	**a) Limited social life**
A valid WP, that can only be requested by the employer, is necessary to work as a domestic worker. *Unilateral termination of the contract at any time for any reason is possible, which can be a source of anxiety for the FDW who remains unsure of the duration of her employment.* *If the levy is not paid or employer mistreats the FDW, the WP is revoked and the FDW is left without a valid WP, which entails repatriation, which may explain why some FDWs remain in the service of a mistreating employer.* *There is no obligation for the current employer to accept the transfer of a FDW to another employer.*	*No possibility of bringing a member of her family with her in Singapore.* *Compulsory live-in arrangement.* *No compulsory private room.* *No close social support is available to help morally the domestic worker while she copes with the demanding and stressful emotional care for the elderly and young one under her care.*	*Restricted possibility of a social life.* *Restricted possibility of entertaining a romantic relation for fear of pregnancy.* *A romantic relationship with a male Singapore citizen or PR is a cause for repatriation.*

Economic precarity	Affective precarity	Social precarity
b) Low wages	**b) Loss of control over one's life**	**b) Social and legal exclusion**
No minimum wage, except for Filipino and Indonesian FDWs. *Uneven power work relationship in wage negotiation.* *No other work possibility for FDW to earn extra money.* *No possibility for FDW to diversify her work experience and develop new skills in another sector of activity.* *Indebtedness risks to repay loans and fees to recruiting agencies, at home and abroad, leaving the FDW without a real salary for months.*	*No control over choices in her love life.* *No control over her biological reproduction.* *No control over long-term professional plans.* *No control over her privacy in her daily life, for example to remain in contact with her loved ones.* *Limited control over her working and living conditions, and little leverage for improving them for fear of repraisal.*	*Exclusion from possible citizenship.* *Exclusion from possible PR status.* *Exclusion from a full integration in the Singapore society.* *Exclusion from the rights offered to foreign high-skilled workers.* *Exclusion from the CPF.* *Difficult access to legal recourse and representation, except through CSOs and MOM's complaint procedure.*
c) Limited work rights and entitlements	**c) Self-worth depreciation**	**c) Political and associational exclusion**
Exclusion from the EA. *Governed by the EFMA:* *limited rights: e.g. no pension, unemployment, maternity leaves, or paid holidays.* *Only the protection offered by the PAI package (insurance/ accident/ sickness).* *There is no market opportunity nor competition within the domestic work sector in Singapore.*	*Exclusion from possible citizenship leading to feelings of being inferior, not good enough, not worthy, etc.* *Compulsory medical screening for pregnancy every 6 months can lead to feelings of humiliation, discrimination, and unworthiness of trust.*	*Exclusion from workers' association, trade unions, or any political group.* *Participation is limited to activities organized by state approved CSOs.* *Participation is limited to social and civic realms, no political activities.*
d) Asymmetrical work relation	**d) Feeling of disempowerment**	**d) Gender and social discrimination**
WP conditions create an asymmetrical power relationship: e.g. transfer, working and living conditions negotiations, employment relationship, renewal of WP, etc. *Only employer can request the WP, giving him/her the upper hand in all areas of their employment and personal relationship.*	*No hope for social or professional mobility within the Singapore society. No leverage when asking for a favor (e.g., family emergency, special day off).* *Recruiting agencies disempower FDWs by promoting submissiveness and not making clear the content of contract and working conditions.* *Powerlessness due to the financial stress to repay her debts.*	*Being asked if pregnant or intending to have children is discriminating (ITC-ILO 2010).* *No other female worker is submitted to medical pregnancy testing regularly.* *Gender discrimination because of the exclusion from laws regulating and protecting male migrant workers.* *Limited social support for a new FDW in case of abuse or mistreatment.*

5.1.3 Main findings relating to the precarity of domestic workers in Singapore

Two major policies affect more importantly the precarity of domestic workers in Singapore: the security bond and the WP conditions. As far as the security bond is concerned, it can be forfeited if any of the following situations arises: the employer or the domestic worker violates any of the conditions of the WP; the employer does not pay the domestic worker on time; the employer fails to send the domestic worker home when her WP is expired, revoked, or cancelled; the domestic worker goes missing or becomes pregnant. The employer is not liable for the domestic worker's violations (such as those relating to pregnancy) if he/she can prove that he/she has informed her of the WP conditions she must comply with, and the employer has reported a violation as soon as he-she has become aware of the violation. The possible loss of the $5000 security bond explains why some employers keep a tight control over their domestic worker's mobility by forbidding her to go out, refusing to give her a day off or illegally holding on to her personal documents so she cannot leave Singapore without the employer being informed. A domestic worker may leave Singapore during her employment term with her employer's approval, but if she does not return from her oversea leave, the WP is cancelled. If ever she returns before the security bond has been discharged, the employer must send her back home right away. If this is not done, the employer will lose the security bond.

As for the WP conditions, the domestic worker must also follow strict rules if she wishes to hold on to the WP since the WP is the key for her to work and remain in Singapore. If the WP is revoked, the FDW must leave Singapore. Only an employer, sponsor or authorized employment agent can apply for the WP. A domestic worker cannot do so on her own, consequently this regulation creates a dependence of the domestic worker on her employer and places her in an asymmetrical power relationship in the workplace since the WP is the key that opens and keeps the door open to work as a domestic worker in Singapore. This is a critical element that directly influences the domestic worker's working, negotiating, and decision-making such as to work in lieu of a day of rest to satisfy one's employer, to express a complaint about a work condition or to demand a leave for a family emergency for example. There is no market opportunity nor competition within the domestic work sector in Singapore and no alternative route to better one's labour practices since the work permit system restricts foreign domestic workers to a domestic work job for a specified employer.

Only an employer can bring into Singapore a person for whom he/she has requested a WP. Therefore, a domestic worker cannot bring with her any family member(s) in Singapore which means that a FDW is cut off from the support her family and social network for a relatively long time, at least for two years. A WP holder cannot administer or manage a business in Singapore. All work pass holders must only work for their designated employer. The domestic worker must not take on additional jobs or engage in activities to earn additional income in Singapore. She cannot diversify her work experience while in Singapore nor can she study. If the domestic worker wishes to transfer to another employer at the end of her contract, the present employer is not obligated to accept the transfer, which means that, if the present employer refuses, the domestic worker must pay new agency recruiting fees or decide to go back home. A domestic worker may be given time to visit her family in her homeland, but the employer must check the validity of the domestic worker's passport, make sure she has her WP card and passport when she leaves, keep a copy of her travel ticket and departure itinerary. These measures make the domestic worker feel

she is controlled by her employer at all times, even when she is out of Singapore. If the domestic worker will be gone for an extended period, the WP may be cancelled. That also means that while the worker is out of Singapore, the WP may be cancelled unilaterally by the employer. The fear of losing the WP is a major reason why domestic worker may not want to report mistreatment, unpaid salary or express grievances since the loss of a valid WP entails immediate repatriation.

Another major reason for the limited rights and protection offered to FDWs is the fact they are not included in EA. They are regulated instead by the EFMA that offers limited rights and protection, that is only the ones provided through the employer's health and insurance package and does not provide for pension, unemployment, maternity leaves, or paid holidays, nor does it define rest periods during the day or public holidays, which are negotiated within an uneven work relationship that favors the employer. The orientation and settling-in programs do help FDWs to access information on their rights and employment conditions and represent a measure put in place by the state to improve their situation. The MOM's argument for not including domestic workers in the EA is that "it is not practical to regulate specific aspects of domestic work, such as hours of work and work on public holidays"[8] as it is done for regular workers. What is understood here is that it is not "practical" for the employer. The MOM argues that, because of this, it is important that the employment contract be signed by both parties to avoid disputes that can arise. The employment contract should include the following details: salary, placement loan, number of rest days per month, compensation in lieu of rest day, notice period, compensation in lieu of termination notice.

These recommendations are exactly that: recommendations but they are not compulsory obligations since it is mentioned on the MOM website that the employer is "encouraged" to sign an employment contract with the domestic worker, yet he/she is "required" to sign a safety agreement with her. Furthermore, the early termination of the contract is possible and legal "to maintain flexibility" for the employer and the domestic worker because circumstances may change. Either the domestic worker or the employer may terminate the employment contract by giving the notice period stated in the employment contract. If the notice period cannot be given, a regulation indicates that the party terminating the contract will pay salary in lieu of notice or notice period can be waived by mutual consent.

What the MOM does not account for when encouraging such flexible arrangements is the asymmetrical power relation and the fragile status of the domestic worker as a non-citizen, non-permanent resident whose presence in Singapore is dependent on the temporary WP that can be revoked at any time. For example, a domestic worker may accept to work on her regular day of rest for fear of indisposing her employer or of losing her job if she refuses certain demands of the employer. Another case is when the domestic worker wants to work for another employer at the end of a contract. If the employer refuses to facilitate the transfer, the domestic worker has no legal recourse. The WP will be revoked, and the domestic worker will be sent back home. This asymmetrical power relation is an important sub-dimension of the employment precarity. In terms of salaries, some satisfied employers choose to pay annual bonuses, or a 13th pay cheque to their

[8] https://www.mom.gov.sg/passes-and-permits/work-permit-for-foreign-domestic-worker/employers-guide/contracts-and-safety-agreement?_sm_au_=isV7rSJk8kZR55Zq

domestic worker to secure her loyalty and ensure the maintenance of a healthy working relationship (HelperChoice), but there is no obligation. This is entirely left to employer's decision and financial means, since he/she also to pay the monthly levy, health and insurance package, food and accommodation, the security bond, and bi-annual medical examinations.

There is no minimum wage in Singapore for domestic work, except for Filipino and Indonesian domestic workers who are paid at least S$550 monthly following interstate negotiations. All other domestic workers must negotiate their basic salary within an asymmetrical power relationship, which disfavors them, especially for a first-time domestic worker who may be afraid to lose the opportunity to work in Singapore if she tries to bargain for a higher salary than what the employer is willing to offer. Often unaware of her rights, she may accept unfair work conditions and low wages. In some cases, a domestic worker can work for months without getting a decent pay for indebtedness reason since she may have to repay a loan or the agency's fees that can be very high in her home state, or she may have to repay family or friends that have lent her money to allow her to start the process of working in Singapore.

The compulsory live-in obligation has many implications for the domestic worker's social and personal life since she cannot entertain friends in her living quarters; she is isolated from the outside world in the home with people who are not her family, who are of different social, linguistic, or religious background; and it is difficult for her to meet other people or do other activities especially if she does not have a day-off. When a separate room is not possible, she may experience a loss of privacy for calling home, for physical and mental rest, or for simply being on her own and away from the rest of the family. These regulations affect most seriously her affective and social precarity. Furthermore, she is refrained from developing a romantic relationship with a Singapore citizen or a PR, marry a Singapore citizen or PR, even after the termination of her contract, unless she obtains a special permission. This entails that a domestic worker does not have the full control of her biological reproduction and love life since she must choose between keeping her work or continuing her pregnancy. Finally, the compulsory medical examinations every 6 months for pregnancy is discriminatory since female FDWs constitute the only group of workers for which regular pregnancy screenings are required. No other female worker is submitted to this type of medical testing in Singapore. Also, when female domestic workers are excluded from employment laws regulating working conditions of all other migrant workers (e.g. men in the construction and restaurant sectors) and the Workmen's Compensation Act, they are facing gender discrimination (HRW 2005).

When facing a situation that requires legal procedures, pro bono legal representation is not easy to access and other factors, such as loss of income while waiting for trial, language barrier, unfamiliarity with Singapore's legal system, limited financial means, insufficient number of criminal lawyers, etc., make it very difficult for domestic workers to get the legal help and support they need to win their case (Oh 2020). Recruiting agencies may also use harmful strategies. For example, during training sessions, instead of empowering domestic workers, they may tend to make them submissive and less demanding vis-à-vis their employer. Agencies' lack of transparency may threaten FDWs' awareness about the content of their contract and working conditions, leaving them disempowered uupon entering the employment relationship (Liani 2020).

Furthermore, by treating domestic workers differently to other workers, mostly by keeping them forever transient workers and refusing them permanent residency and citizenship, Singapore authorities are increasing the risks of discriminatory attitudes towards them by their employers and the general population. The ILO study on the public attitudes towards migrant workers in Japan, Malaysia, Singapore, and Thailand (ILO 2019b) shows that in Singapore 64% of employers of domestic workers and 62% of non-employers of domestic workers support the idea of providing the same labour rights to domestic workers as other workers, but it does mean that 36% of employers of domestic workers and 38% of non-employers of domestic workers in Singapore do not recognize the value of the domestic work done by female migrants in their country, at least not sufficiently to afford them the same rights as all other workers. It also means that more than a third of Singaporeans are not aware of the high risks of discrimination, abuse, and exploitative working and living conditions that FDWs must live with when they work in the city-state. This is in part due to the labour policies that exclude domestic workers from the EA and contribute to keep them in a separate class as non-regular workers undeserving the same basic rights and entitlements enjoyed by all other workers.

Chapter 6 Labour laws, informality, precarity, and domestic work in Argentina

Due to my limited knowledge of the Spanish language, I was not able to analyze the labour laws directly on the Argentine government website, but, fortunately for me, other authors have investigated the matter in depth (Poblete 2019; Poblete 2018a and 2018b; Ronconi 2012; Mourelo 2020; Pereyra 2017). As was the case in Singapore, domestic workers in Argentina have been governed through the years by special regimes of labour law, which *de facto* recognizes them as non-regular workers. I start the chapter with a brief discussion on informality because it is an important element that characterizes the conditions of domestic workers in Argentina.

6.1 A brief discussion on informality and the domestic work sector in Argentina

It is almost impossible indeed to discuss the issue of domestic work in Argentina without including a brief discussion on the concept of informality. Informality can be defined in narrow and parsimonious terms, as do Esquivel and Pereyra, as "the absence of employers' contributions to social security, and therefore, to workers' access to social protection" (2017, 18). Consequently, formality can be defined as the payment of such contributions giving access to social protection, which is not the case for domestic workers in Singapore or non-registered workers in Argentina. In Argentina, the employer has the sole prerogative of the registration (or formalization) of the domestic worker in his/her employment.

The ILO defines informal employment in more specific terms as "working arrangements that are *de facto* or *de jure* not subject to the national labour legislation, income taxation or entitlement to social protection or certain other employment benefits (advance notice of dismissal, severance pay, paid annual or sick leave, etc.) (OECD/ILO 2019, 26). According to the ILO's definition, domestic workers in both Argentina and Singapore are informal workers since they are not subject to the national labour legislation that governs all regular workers in each national context (the Employment Act in Singapore and the Law on Contract of Employment in Argentina). They are governed instead by special regimes (EFMA in Singapore and the 2013 Personal Household Staff Law in Argentina) that render domestic workers *de facto* non-regular workers and informal workers according to the ILO's understanding of informality.

Yet, informality intersects with precarity in Argentina in a different way than it does in Singapore, where domestic work is highly regulated. In Latin America, Blofield and Jokela assert that domestic workers have mainly “operated outside the realm of labour rights and protections, both legally (in labour codes) and in practice (steeped in informality)” (2018, 532). As mentioned previously, informality is so culturally well-entrenched in the mentalities of domestic workers and employers in Argentina that it constitutes a major barrier to higher rates of registration within the formal domestic work sector, according to Bertranou et al. (2015, 7). Yet, when formalized through a registration process, domestic workers can enjoy almost all the same benefits as any other formal sector workers. However, overcoming the barriers to formalization is challenging as illustrated by the remaining high percentage of informality of about 75% in the domestic work sector in Argentina, despite progressive labor policies put in place by the state aiming to encourage formalization in the last two decades, as will be discussed in the present chapter. It must be noted that the high informality in Argentina renders the statistics on domestic work less credible in terms

of hours worked, wages earned, migrant or local numbers of domestic workers themselves. Therefore, their value must be taken as an indicative measure of the importance and trends that affect domestic work. The issue of informality itself is problematic due to the clandestine nature of informal work aiming to remain invisible, done secretively, and purposely kept unknown to the authorities. All statistics on informality must therefore be also taken as an indicative estimate when discussing formal and informal work.

Poblete asserts that "[I]nformality is a structural feature of the labour market in developing countries, particularly in Latin America" (Poblete 2019, 169). Argentina is no exception to the rule and informality rates among workers of all sectors have always been high in Argentina and neo-liberalism's call for labour flexibility in all sectors of activities has in fact strengthened informality as shown by these high percentages: 35% in 1990s, 45% in 2002s, and 34% in 2019 (Poblete 2019, 167). Labour flexibility defined as "short-term contracts, part-time jobs, internships, and different kinds of subcontracting arrangements like temporary employment agencies or the promotion of self-employment" (Poblete 2019, 167) became a further incentive inducing workers to turn toinformal types of work. However, since the mid-2000 and in line with the ILO's aim to provide decent work for all workers, including domestic workers, the push has been to promote the formalization of all workers to counter precarious working conditions. I now turn to examine how Argentina has adapted the labour laws and policies that affect the domestic work sector since the mid-1950s until recent times to encourage the formalization of domestic workers within its borders.

6.2 Labour laws and domestic work in Argentina

In Argentina, the regulatory framework on domestic work had not been updated since 1956. Between 2000 and 2013, important legislations were enacted to encourage domestic workers to formalize. The expertise of Lorena Poblete in the matter of domestic work in Argentina was a major source of information that helped me navigate the complex Argentine regulatory response to informality in the matter of domestic work. In 2004, according to Poblete, in line with the ILO's approach to provide all workers with decent work conditions, Argentina introduced "regulatory innovations and novel enforcement mechanisms" (2019, 168).

6.2.1 Historical development of labour laws relating to the domestic work sector

Poblete notes that "in Argentina, formalisation policies principally entailed reforms to the tax regime and the social security system, although the labour law was also adjusted to allow informal workers to become formal. Social security benefits - like health insurance and pensions - were the main goal of the formalisation policies serving as an incentive for informal workers" (Poblete 2019, 168). Formalizing thus meant for domestic workers obtaining social protection, in particular health insurance. The author explains that the first experiment to counter informality was to update the 1998 Single Tax Regimen that regulated self-employed workers, professionals as well as small business owners and low-skilled wage earners; the second experiment specifically aimed to encourage paid domestic workers to formalize in exchange for the same rights enjoyed by all other workers through the implementation of new sets of labour laws and policies designed to meet the needs of their particular working conditions (Poblete 2019, 168). My interest lies in the latter regulatory framework.

The Argentine state considers an informal domestic worker as a worker who is not in compliance with the law because she is not registered, meaning that she does not contribute nor does her employer contribute for her to the social security regime through regular monthly contributions (Poblete 2019, 173). Informal work also means that unregistered domestic workers are not guaranteed the same social security and rights as those granted to registered domestic workers regarding the rights to the health insurance and the retirement pension (Poblete 2019, 173). The absence of a written contract specifying the work conditions is also a criterium of informality and a common practice in the informal domestic work sector.

Between 2000 and 2013, to promote the formalization of domestic workers, the Argentine government reformed existing laws or presented new laws to govern the domestic work sector. The objective of such laws was met with some success since the formalization of domestic workers increased from 5% in 2003 to 16% in 2013 and to 25% in 2016 (Poblete 2018a, 183). Yet it still leaves three out of four domestic workers unregistered at the present time. This raises the question of why, despite state's efforts to encourage formalization through less stringent criteria for and easier access to registration, so many domestic workers remain unregistered. Poblete offers an answer by identifying two factors of informality of domestic work in Argentina (2020, 34). The first factor relates to the historical servitude model and the traditional culture of patriarchy that have structured the relationship between employers and domestic workers through time (Poblete 2020, 34). Domestic work being the apanage of women within the domestic sphere traditionally, has remained, even in its paid form, conceived as "help", in other words not as real work, therefore not a worthy to be governed by the same legal framework as other forms of employment. According to Poblete, the working relationship between the employer and the domestic worker is not perceived as a regular economic relationship by either parties, and the workplace, characterized by intimacy and proximity, is more conducive to affective and emotional bonds that further blur the economic working relationship (2020, 34). The second factor is the existing regulatory framework and the conditions of its implementation that has governed the domestic work sector from the 1956 Special Statute on Domestic Work up to the 2013 Personal Household Staff Law (Poblete 2020, 34), a framework which will be explained shortly in more detail.

Poblete's review of some of the main characteristics of domestic workers in Argentina is important to understand the continued high rates of informality of domestic work in Argentina. Most domestic workers in Argentina are native Argentinians, that is 85% in 2014, out of which about one third are internal migrants who left their poorer rural regions to migrate to the wealthy metropolitan area of Buenos Aires or to other urban areas that offered work opportunities; only 14% of domestic workers are migrants from the neighboring countries (Poblete 2019, 181). For 35% of all domestic workers in Argentina, domestic work is a secondary family income and, for 39% of them domestic work is the primary family income (Poblete 2019, 181).

Domestic workers, working on a full-time basis should in theory experience less precarity since their full-time work should afford them good enough wages and motivate their employers to register them, thus affording them pension and healthcare benefits. However, only 20% of domestic workers work on a full-time basis, that is over 40 hours a week. About 40% of domestic workers perform between 16 and 39 hours of work per week; another 32.4% work between 6 and 15 hours per week, and 9.3% work for less than 6 hours per week (Poblete 2019, 181). This means that 80% of domestic workers in Argentina work part-time, earn low wages, and are most probably

among the not registered workers, employer or domestic worker or both parties preferring flexible work arrangements. Furthermore, very few domestic workers in 2010 had been working for the same employer for more than 5 years, 47.9% between 1 and 5 years, 28,7% for less than one (1) year (Poblete 2019, 181). As a result, the rotation rate in the domestic work sector is very high in Argentina contributing to another factor of the non-registration of domestic workers, since either one or both parties, unsure of how long the employment relation will last, decide not to go through the tedious process of registration.

Another factor is the fact that many workers are now working for more than one employer in Argentina. For example, in 2014, only 41.4 % worked for more than 16 hours per week for the same employer (Poblete 2019, 181). This has major consequences in terms of domestic workers' access to social security benefits since, from 1956 to till 2000, 16 hours a week was the determinant number of hours for the same employer that allowed domestic workers to qualify for registration. All those who did not qualify, worked informally without pension or healthcare benefits other than the universal social security benefits offered to all citizens of Argentina. In 2014, close to 60% of domestic workers were in that situation.

I now turn to analyze how the labour laws governing the domestic work sector in Argentina have contributed historically to the precarity of domestic workers in Argentina to establish the links between precarity, informality, and labour legislation in Argentina. For Poblete, "informality was a problem associated with the scope of existing legislation since more than half of domestic workers were excluded" (Poblete 2019, 182), meaning they did not qualify to be registered by the employer because they did not meet the required criteria of hours worked for the same employer. Indeed, between 1956 and 2000, the same regulation remained in place and was based on the Presidential Decree 326/56 that established the Special Statute on Domestic Work. The special regime that regulated the domestic work sector and provided domestic workers with some social benefits through the registration by the employers of domestic workers that met one of two specific criteria: to work for the same employer as a live-in domestic worker or to perform domestic work as a live-out domestic worker for the same employer for at least four (4) hours a day four (4) days a week, thus 16 hours a week (Poblete 2019, 182). If the domestic worker was not able to meet one of the two criteria (live-in arrangement or live-out arrangement working for at least 16 hours a week for the same employer), she could not be registered in the social security regime, thus did not have access to health and pension benefits and working rights, since no contributions were paid to the social security system on her behalf by her employer or by herself.

As the only regulation in force between 1956 and 2000, the Special Statute on Domestic Work (Presidential Decree 326/560) excluded almost 50% of the domestic workers because they could not qualify for registration either because they were not in a live-in arrangement, or, if they were in a live-out arrangement, they worked for less than 16 hours a week for the same employer or, if they worked for at least 16 hours a week, they did not do so for the same employer. For domestic workers who qualified and were registered, the 326/56 Decree offered some benefits such as paid vacations, sick leave and severance pay, but their amounts and duration were less generous that those offered to other registered workers (Poblete 2020, 34), which was discriminatory. In sum, for 44 years, half of the domestic workers were not registered because they did not qualify for registration since they did not meet one of the two criteria. They came to accept living with the uncertainty and insecurity of work, discrimination, low wages, and without any

social benefits because of the limited scope of Decree 326/56 that legally and formally excluded them from the Special Domestic Work Regime (Poblete 2020, 37). Their only choice was to work informally, not illegally since the choice was possible. This does not imply that the other 50% who qualified were all registered. On the opposite, most did not since only 5% of domestic workers were formalized in 2003 and 16% in 2012, according to Poblete (2018a, 183; 2016, 37).

I would argue that the social acceptability of the informal arrangements within the domestic work sector had time to take profound roots, to solidify, and to become well-entrenched in the minds of employers and domestic workers, especially since informal paid domestic work had been the case for all domestic workers well before the 1956 Decree. With the 1956 Decree, if a domestic worker did not wish to be a live-in domestic worker or did not work for the same employer for at least 16 hours a week, she could not be registered by her employer. Many married women probably did not wish to be a live-in domestic worker or, for one reason or another (e.g., having young children or other responsibilities), could not or did not want to work for the same employer for at least 16 hours a week. They then worked as informal domestic workers and did not have access to health and pension benefits nor to working rights. Employers also may not have wanted to employ a live-in, did not need the help of a worker for a minimum of 16 hours a week, or plainly did not wish to register their domestic worker because of the contributions and taxes it meant to have to pay. The system was thus legally in force for 44 years before the state decided that things had to change.

In 2000, a new law came into effect to modernize and regulate the domestic work sector. Law 25,239, also called the Special Social Security Regime for Domestic Workers, extended social security benefits to all domestic workers performing at least six (6) hours of work per week for the same employer. As Poblete explains, "[T]his expansion of legal coverage was achieved not by broadening the scope of the 1956 statute but by creating a new and special social security regime for all domestic workers excluded from that regime", that is the 1956 Decree regime (2019, 182). Law 25,239 did not replace the 1956 Decree but instead created a separate contributory regime and some inequalities among workers of the same sector of activity since domestic workers registered under the 1956 Decree enjoyed almost the same rights as employees (regular workers) in terms of social benefits but those covered by the new Law 25,239 only had the right to social benefits, but no paid vacation holiday, no maternity leaves, or no work hours limits that domestic workers under the 1956 Decree enjoyed to some extent.

Furthermore, the contributory nature of Law 25,239 Special Social Security Regime for Domestic Workers enacted in 2000 was based on the compulsory total employer's contributions if the domestic worker worked for at least 16 hours a week for that same employer. If the domestic worker did not work the minimum weekly 16 hours but did so for at least 6 hours a week, she qualified to be registered and she could, on a strictly voluntary basis, supplement the amount the employer would pay if she worked the minimum 16 hours a week to access the social benefits (Poblete 2019, 182). Considering domestic workers' low wages, few were able to take advantage of the opportunity, and, although more domestic workers qualified for registration, few did ask to be registered since to access the social benefits, they would have to complement the contributions to the amount of what the employer would pay if they worked the 16 hours a week.

Again, Poblete offers pertinent additional information: "[T]he voluntary contribution are calculated taking into account the difference between the minimum established by law and the sum the employer is required to pay based on the number of hours worked by the domestic worker. When a domestic worker works for different employers for less than 16 hours each, the partial contributions made by each of the employers are combined" (2019, 183). Thus, the more employers the domestic worker has, the least voluntary contributions she must make herself. For example, if the combined contributions made by all her employers amounted to the minimum legally required for her to access the benefits if she had been working for one employer for 16 hours a week, she did not have to compensate for the difference between the minimum and the sum paid by her employers. Law 25, 239 had an additional effect in that it created two different classes of domestic workers: those for whom the employer paid the total amount of contributions and those who had make voluntary contributions to access the full social security benefits if the combined contributions of her employers did not meet the minimum legally required contributions.

One important element to know regarding the registration process is that it is the employer who registers the domestic worker. The domestic worker cannot on her own register herself. This is like the Work Permit regime in Singapore where only the employer can request the work permit, not the foreign domestic worker herself. As a result, it places the domestic worker in a dependent situation and creates an asymmetrical power relationship in Argentina as it does for domestic workers in Singapore. The employer, as the dominant party, holds the prerogative of the registration in Argentina or the Work Permit request in Singapore. Of course, in all cases, the domestic worker and the employer must both agree to proceed with the registration within the social security system and to its obligations (registration process, payments of contributions, administrative forms, etc.), as is the case for the Work Permit request in Singapore.

In sum, by 2000, about 91% of domestic workers qualified to be registered under one or the other of the regimes: the 1956 Decree or Law 25,239, which again does not mean that domestic workers were de facto registered, but only that they qualified to be registered if their employers and themselves agreed to the registration. It left about 9% of domestic workers unable to qualify for registration because they did not meet the criteria of either regime. To remediate the situation, another regulation, an Executive Order, was put forth in 2004 establishing that all domestic workers working for less than six (6) hours per week for one or more employers could register as self-employed workers under the Single Tax Regimen (Poblete 2020, 37). This introduced a third type of regime for domestic workers, but it also meant that domestic workers enrolling in this third type of regime would have to fully pay the social contributions. This was quite unrealistic since those working for such a low number of hours per week, whether for one or many employers, would not have the financial means to pay the contributions that they, as independent service providers (which is what they were considered under the 2004 regime), had to pay. Furthermore, the uncertainty of their working hours would not allow them to afford such extra payments (Poblete 2019, 183). Even though, three possible venues had been open to domestic workers to access social benefits through registration, only 7% of all domestic workers were in fact registered by 2005 (Poblete 2019, 183; Poblete 2020, 37).

Under the presidency of Christina Fernandez de Kirchner and the center-left alliance party of the Front for Victory, the Argentine state was looking to increase the rate of formalization of national and migrant domestic workers since it was aiming to ratify the Domestic Workers'

Convention 189 of 2011, which it will do in 2014. Another law, Law 26,844, or Personal Household Staff Law establishing the Special Regime of Employment Contract for Domestic Workers, was passed in 2013 following a three-year debate and multiple draft bills (Poblete 2019, 183). Once Law 26,844 was passed, it was considered a milestone in legislation on domestic work (Poblete 2020, 37), since it expanded the scope of the law to all and carried a set of rights comparable to those enjoyed by employees in the private sector governed by the Labour Contract Law, the national labour law governing all workers in Argentina (Poblete 2020, 38). Law 26,844 gave access to all registered domestic workers working at least one (1) hour a week to social benefits (health insurance and pension benefits) as well as working rights such as limited working hours a day, weekly rest, worker compensation, a trial period, severance pay, overtime pay, annual mandatory bonuses, paid holidays, sick leave and maternity leave (Poblete 2019, 184; Poblete 2020, 37). Law 26, 844 was recognized by the ILO as a law whose "principles of equality, non-discrimination, and due process bring Argentine norms in line with both ILO migrant rights standards and Argentine constitutional law. The current immigration law gives Paraguayan migrants and other migrants within Mercosur countries parity with Argentine nationals in terms of labour and social rights" (ILO 2014, 2). Thus, with Law 26,844, registered migrant domestic workers had access to the same benefits as native domestic workers. Poblete also adds that Law 26,844 aimed to protect workers of 16 to 18 years of age by not allowing them to be live-ins and limiting their working hours so they could attend high school; it limited the trial period to thirty (30) days for live-ins and fifteen (15) days for live-outs; and it included three types of allowances: pregnancy, maternity, and universal child allowance (Poblete 2018a,186). With the enactment of Law 26,844, 100% of domestic workers were now able to qualify to registration if their employer accepted to register them.

The different legislations on domestic work, from 1956 to 2013, thus modified the legal definition of a domestic worker as it went from "selectivity to universalism in terms of labour law coverage (Poblete 2020, 38). In 1956, a domestic worker was a person, usually a woman, working full-time for the same employer for a least 16 hours a week or working as a live-in domestic worker. In 2000, a domestic worker, according to the law, was a person working at least six (6) hours per week for the same employer on an occupational basis. In 2013, any person working at least one (1) hour a week within a private household was now legally considered a domestic worker if registered (Poblete 2019, 185). However, still very few domestic workers were registered despite the many benefits that registration offered them, that is only 25% in 2016 (Poblete 2020, 37). By keeping domestic work governed under a separate law, the State reiterates the fact that domestic work is not a work like any other, even though the 2013 Law 26,844 afforded domestic workers the same rights and protection enjoyed by wage-earners in the formal private sector, with "the right to an annual bonus, regular leave [annual holidays], special leave [maternity leave], overtime pay and severance pay equal to that granted to employees" as well as collective bargaining rights and insurance against occupational hazards (Poblete 2018a, 185).

Chart 3 below illustrates the complex reality of the successive regimes and laws that governed the domestic work sector in Argentine from 1956 up to the present times.

Chart 3 Chart of domestic workers by criteria, labour rights, and social security benefits

Form of employment	Domestic work regime legislation	Criteria for registration	Labour rights	Social security benefits	Other laws and aspects
Pre-1956 **Non-registered** **- Informal employment**	Unlegislated employment Full time or part-time For one or many employers Live-in or live-out arrangement	None	- No legal guarantee of labour rights or social benefits other than universal benefits and non-contributory benefits - Work conditions are dependent on the discretionary capacity and good will of the employer	Universal benefits: e.g. - child benefit and school allowance - universal medical benefits - pregnancy allowance and cash maternity benefit - old-age, mother's, disability, and survivor pensions	- Flexible hours - Second salary or primary salary - Non-registration is not illegal, it is a possible choice
From 1956 to 2013 **Registered** **- Formal employment**	1956: **Decree 326/56** Special Statute on Domestic Work (47.2% qualify for registration)	- Live-in worker or full- time live-out = 16 hours/week for same employer - Contributions paid by the employer	- same rights as regular workers for weekly rest, work attire, work tools, healthy diet, - no paid vacation holidays, maternity leave or workday limits	- Universal benefits + - Healthcare insurance and pension benefits	- Tribunal of Domestic Work
	2000: **Law 25,239** Special Social Security regime for Domestic Workers (90.6% qualify for registration)	- Minimum of 6 hrs/week for same employer - Compulsory total contributions by the employer if 16 + hours/week - Voluntary worker's contributions if less than 16 hrs/week	- Rights comparable to the Labour Contract Act: e.g. - minimum wage regime - working hours limits, - weekly rest of 35 hrs, - severance and overtime, - annual bonus.	- Universal benefits + - Healthcare insurance and pension benefits - Insurance against occupational hazards	
	2004: **Executive Order** Possibility to enroll in the Single Tax Regimen as self-employed workers (99% qualify for registration)	- Less than 6 hours per week for one or + employers, but must pay total contributions and taxes as an independent worker	Rights comparable to the Labour Contract Act.	- Universal benefits + - Healthcare insurance and pension benefits	2005: Law 26,063: tax exemption for employer 2008: No domestic work under 16 years ; care givers recognized as DWs;
	2013: **Law 26.844** Personal Household Staff Law (100% qualify for registration).	- 1 hour/week	Rights comparable to the Labour Contract Act. - No mandatory written contract - Work conditions listed in the online registration process.		2012: benefits under the Family Allowance Act: pregnancy, maternity, and universal child allowance.

The different categories of domestic workers created through time may appear as a simple issue of semantic and yet is a complex issue. For example, Poblete argue, that according to the State, domestic work is not a work as any other, not because of the reasons usually invoked of the private nature of the workplace or the particular nature of the employer-employee relationship of domestic work. The author argues that the reason why the State will not consider domestic work as a work like any other and include it in the national labour law lies in the attributes of the employer defined as an employer-worker. The employer-worker status differentiates him/her from the typical employer who, when employing a worker, obtains a direct profit from paying his employee, which is not the case of a household that employs a domestic worker. Therefore, according to the State, the employer can only partly comply to the obligations ensuing from the work relationship (Poblete 2019, 184), thus the employer of a domestic worker cannot be regulated in the same manner as other employers regulated by the national labour law.

The issue of the employer's contribution created a hot debate in the parliament when Law 26,844 was first presented to the legislators. Since the domestic worker does not earn directly money for the employer, the legislator considered that it could not ask employers-workers to pay high contributions that might discourage them to register the domestic worker in their employment. In the end, after a heated debate in the parliament, the Argentine state adopted an economic position: "formalization must be economically appealing for both the employer and the domestic workers" (Poblete 2018a, 196). That meant that employers' contributions would not be too high and that domestic workers would not lose the child allowance benefit if registered, another issue that played against domestic workers' registration.

The 2013 Act thus allowed domestic workers to retain access to the universal child allowance when registered, even when their income was over the minimum wage. These are two reasons why domestic workers could not be included in the universal regime of family allowance previously. It seems that this is not clear to many domestic workers who refuse to register believing they will lose their right to the family allowance if they are registered (Poblete 2018a, 197). By keeping domestic workers governed by a separate regime and employers' contributions relatively low, the state aimed to encourage employers to register their domestic workers and de facto recognizing domestic work "like no other" or non-regular work (Poblete 2019, 183), but at least making health insurance and retirement pensions accessible to a greater number of domestic workers.

The average working hours per week for domestic workers in Argentina is only 25 hours, indicating the preference or obligation for less than the usual 40 to 45 working hours per week that can provide a sufficient income and constitute fulltime work (Poblete 2018a, 182). The limited hours per week explains why domestic workers usually earn less than the legal minimum wage. Domestic work wages represent about 80% of the minimum wage (Poblete 2018a, 182). As mentioned previously, the rotation level is high and even though most work for a single employer, more and more domestic workers are working for multiple employers, and only 2% are a live-ins working full-time (Poblete 2018a, 182). All these work arrangements seem to have a negative effect on registration since employers may have little interest in registering a domestic worker that only works for a few hours a week, perhaps even just on an occasional basis.

At this point, it appears that the high level of informality is due to a combination of two factors: the continued employers' resistance to register workers and the State's incapacity to fully implement and enforce its own policies regarding domestic work and deal with the non-compliance problem with the law (Poblete 2020, 38). As for the first factor, employers' resistance to register domestic workers, Poblete (2018a, 197) offers an additional information as she explains that in Argentina, the implementation of labour laws is under the dual responsibility of the Ministry of Labour and the Federal Tax Agency. The Federal Tax Agency developed three strategies to encourage employer to register their domestic worker. Following the 2013 Act, the first strategy was to simplify the paperwork involved in the registration process and payment of social security contributions. New information technologies provided employers with three simplified enrollment options: on the public treasury website, by phone, or though home banking services but keeping mandatory the *libreta de trabajo* (work registration book) for domestic workers (Poblete 2018a, 197). The second strategy was to maintain the tax exemption for employers of domestic workers that was in place since 2005, whereby employers could deduct from their revenues the total amount of the social contributions he/she had to pay on behalf of the domestic worker and even to deduct the wages paid to the domestic works on his/her income tax return (Poblete 2018a, 197), a strategy met with great success when it was implemented in 2005 (Poblete 2020, 38).

The third strategy consisted in identifying which household employed informally a domestic worker and forcefully encourage the household head to comply with the new law. The Federal Tax Agency devised the Minimum Domestic Work Indicator in 2013 based on the presumption of the presence of a domestic worker within the household (Poblete 2018, 198). The measure is explained by Poblete in the following terms: "The indicator was based on the gross annual income and personal assets (especially real estate) as declared by the taxpayer. When the gross annual income and the value of the home exceeded the minimum established by the indicator, the state would assume that there was a domestic worker who had not yet been enrolled. In these cases, the Federal Tax Agency would send a written warning to the taxpayers, giving them a certain time to formalize the status of the presumed employee. If the taxpayer did not enroll a domestic worker during that period of time, the Federal Tax Agency would proceed to collect the corresponding social security contributions" (Poblete 2018a, 197). Although the measure was effective, it was controversial and was abandoned in 2016 (Poblete 2020, 38). In collaboration with the ILO, the Ministry of Labour developed a fourth strategy to encourage the formalization of domestic workers by employers using public information campaigns designed to encourage registration of domestic workers. These campaigns targeted both the domestic workers and the employers, by informing domestic workers on their rights and the employers on their obligations (Poblete 2020, 39).

As for the second factor, the State's incapacity (or unwillingness?) to fully implement and enforce its own policies regarding domestic work, Poblete explains that the State chose to proceed with the enrolment "through the Federal Tax Agency website, without any workplace inspection or verification of contributions to the security system" (2018, 201). The State invokes the difficulty of ensuring compliance with the law when the work is done in a private home since no inspection can be made in a private residence without a warrant (Poblete 2020, 38). It also justifies its low enforcement because of its limited institutional capacity in terms of the number of inspectors that would be required for the inspection of all employers' homes (Poblete 2020, 38). According to Poblete, in trying to change the social and cultural notion of domestic work from a relationship

based on care and trust into a formal and legal employment relationship, the State was unable to change and transform social practices historically forged since colonial times (2018a, 201). As Pereyra argues, although registration is a mechanism that "threatens class privileges and inequalities strongly rooted in this occupation" (2017, 5), it is also a mechanism that reduces arbitrary employment arrangements. Encouraging formalization must be accompanied by other measures proposed by Pereyra such as awareness and information campaigns, labour inspections, the simplification of the registration process and contribution payments, the establishment of a domestic workers' court nationwide, the identification of allowances and social programs at the national, provincial and municipal level and the expansion of training and the professionalization in the sector (2017, 6).

6.2.2 Charting labour policies and dimensions of precarity for domestic workers

Chart 4 reflects summarily how the dimensions and sub-dimensions of precarity intersect with the labour laws and regulations governing the domestic work sector in Argentina. With Law 26,844, registered national and migrant domestic workers have practically all the same rights and social security benefits as all other employees, which is why the chart below thus identifies mainly how precarity affects non-registered domestic workers.

Chart 4 Chart of the dimensions and sub-dimenstions of precarity of domestic workers in Argentina

Economic Precarity	Affective Precarity	Social Precarity
a) Uncertainty and insecurity of employment	**a) Isolation from support groups**	**a) Limited social life and inclusion**
End of employment at will for both registered and unregistered domestic workers (DWs). *Registered DWs can obtain a severance pay, advance notice as well as pension benefits accumulated during their employment (Law 26,844).* *Non-registered have no rights.*	*Live-in DWs or lone migrant domestic workers (MDWs) are isolated from familial and social networks.*	*MDWs may find it difficult to build a social network, but with time, social inclusion is facilitated, especially for Spanish speakers.*
b) Low wages	**b) Loss of control over one's life**	**b) Social exclusion**
Work conditions and wages improve with the duration of the work relationship and the financial means of the employer. *Wages are lower for registered and non-registered of DWs (80% of minimum wage) compared to other institutional care work employments.* *The level of wages is dependent on the asymmetrical power relationship for both categories of DWs.*	*Younger DWs who must work to help their families cannot continue their studies. This has long-term effects on their social and professional mobility.* *DWs who wish to be registered but who cannot find an employer willing to register them have no control of the fact.* *For fear of not being hired, DWs work informally and accept work conditions out of their control.*	*A reality for many recently arrived MDWs or undocumented DWs.*

Economic Precarity	Affective Precarity	Social Precarity
c) Limited work rights and entitlements	**c) Self-worth depreciation**	**c) Political and associational exclusion**
Unregistered DWs have no access to working rights and social security benefits. *Unregistered workers have no legal recourse in cases of abuse and exploitation.*	*An abusive employer may abuse DWs verbally, physically, or psychologically having long-term detrimental effects on the internalization of one's self-worth and self-confidence.*	*Native Argentine and MDWs can participate in domestic workers unions and associations.* *Easy access to the citizenship status for Mercosur migrants.*
d) Asymmetrical work relation	**d) Feeling of disempowerment**	**d) Gender and social discrimination**
Non-registered DWs have little leverage to negotiate better wages and conditions. *Non-registered DWs are fully dependent on the good will of the employer for all aspects of their working conditions and employment and interpersonal relationship.*	*Undocumented migrants working informally have no legal recourse to support their cause when faulted.* *Young DWs working to support siblings or family members cannot pursue their own dreams of a better future.*	*Female indigenous, migrant and/or undocumented workers may have more difficulty in finding work because of discriminatory employment practices of some employers.*

6.2.3 Main findings relating to the precarity of domestic workers in Argentina

From the above information, I find that non-registered workers are the workers most prone to experience economic precarity because they are entirely dependent on the good will or whim of the employer to respect the terms of the verbal contract established informally between them. Economic precarity also stands out in the case of non-registered workers since the employer can end the work relationship at will without paying a severance pay or giving an advance notice. The wages are also quite low since the asymmetrical power relation does not give the domestic worker much leverage to negotiate higher wages. Other than universal benefits, a non-registered domestic worker would not have access to healthcare insurance and pension benefits enjoyed by registered workers since no contributions are paid on her behalf or by herself as a non-registered worker. In theory, registered workers enjoy the full gamut of working rights and social benefits as all other workers. However, in practice, if their employer does not respect the labour laws, they may also experience some degree of precarity. In the end, non-registered domestic workers are much more vulnerable to serious forms of all the dimensions and sub-dimensions of precarity than the registered domestic workers.

I also find that Argentine domestic workers are less prone to affective and social precarity than are domestic workers in Singapore because they are allowed to entertain a close relationship with their familial and social network, join associations and participate in trade unions or political organizations. Live-in national domestic workers may experience some forms of affective precarity because of the physical distance with their social network, but lone migrants in a live-in arrangement are the most vulnerable to affective and social precarity among domestic workers.

Through the years, as seen previously in Chart 3, various legislations were enacted to encourage the formalization of domestic workers in Argentina. However, the successive legislations between 1956 and 2013 failed to diminish the precarity of most domestic workers since only 25% of domestic workers were registered in 2016, according to Poblete (2020, 37), thus leaving three fourths of domestic workers in informal employment situations, earning low wages, and working without having access to health insurance, retirement benefits, and workers' rights, such as paid leaves, holidays, limited working hours, rest time, etc.

Wages of domestic workers are generally low but may be average or good depending on the employer's financial means since wages are determined through the mutual agreement of employer and domestic worker. Overall, the minimum wage for a domestic worker that does general housework tasks can vary from US$1.43 to 1.97 per hour or US$176 to 243 per month with retirement benefit, and between US$1.53 to 2.12 per hour or US$196 to 270 per month without retirement benefit as of April 2021 (WageIndicator.org). Compared to domestic workers' general wages in Singapore, these minimum wages appear to be very low, approximately about half of the monthly wages that domestic workers earn in Singapore, although the comparison is difficult to make considering the very different economic context. But compared to a factory worker in Argentina whose monthly gross salary is roughly around US$322 (Salary expert 2021), the factory worker's salary is higher than the minimum monthly wage of a domestic worker.

The question of why registration remains so low (25% in 2016) (Poblete 2020, 37) in Argentina despite the positive benefits of registration is puzzling. Some explanations have been provided above, but none seem to be fully satisfactory. According Poblete, the aim of the legislator when enacting new laws governing the domestic work sector in Argentina was two-fold: first, to expand the scope of the legislation so that a greater number of domestic workers could qualify for registration by reducing the criteria of the hours of work per week; second, to entice the registration of domestic workers by increasing the provision of worker's rights and social benefits (retirement pensions and health insurance) (Poblete 2019, 188) all the while keeping the employer's contributions to an acceptable level, a condition to the passing of Law 26,844 in 2013. Yet, it appears that, for domestic workers, the cost of convincing employers, who holds the prerogative of their registration, is higher than the benefit to be hired, since such an important number of them work without being registered, voluntarily or not.

Pereyra argues that the employer's reticence to register domestic workers is because the process of registration implies putting down in writing wages, bonuses, working hours, vacations, etc., which accordingly "limits the employers' ability to 'shape' the working conditions in the way most convenient for them" and renders the work relationship formal and less flexible (Pereyra 2017, 3). For employers, it seems the cost of registration is higher than having to live with a high rate of rotation of domestic workers, who are in abundant supply.

As for the flexibility argument that may explain why domestic workers wish to work only when, if and how it is convenient, it can only partly explain the high level of domestic workers' informality for the trade-off is an extreme commodification of the relationship involving low wages and little or no legal rights and benefits. Furthermore, I would agree with Pereyra that the growing tendency of hourly domestic work in Argentina can only contribute to more informality (2017, 4) since neither the employer or the domestic worker see the need to formalize their

employment relationship, preferring informal and flexible work arrangements. Domestic workers may have little or the wrong information about the legal aspects involved in the registration process and/or of its impact on their lives. Some domestic workers are worried they will lose their child allowance or no longer be covered by their husband's health insurance, and for those reasons do not consider registration positively (Pereyra 2017, 5). Finally, the well-entrenched historic and social acceptability of informal work arrangements in Argentina combined with the neo-liberal practices of non-standard employment relationship are important factors that appear to work against higher rates of formalization in Argentina.

Chapter 7 Conclusion

The question that served as the foundation of my research on the precarity of domestic workers was the following: To what extent are the labour policies of Argentina and Singapore responsible for the precarity of domestic workers within their borders? Months of reading, reflecting, and writing to come up with a satisfying answer to my research question has led me to conclude that the labour policies that regulate the domestic work sector in both countries are indeed responsible for the precarity of domestic workers working within their borders, but each in its own particular way. Although I am unable to quantify "the extent" to which they are responsible (totally, partially,or minimally), I am able to identify the diverging ways in which each state contributes to intensify the precarious working and living conditions of domestic workers that already characteristize domestic work in general. In this concluding chapter, I start by drawing a comparison between the dimensions of precarity experienced by domestic workers in both states by highlighting their similarities and differences based on my examination of various documents relating to the domestic work sector of each state and their governance of the sector through the use of specific labour laws, policies, and regulations. Then, after identifying some issues that stand out, I proceed with recommendations in terms of policy changes that could attenuate the levels of precarity for domestic workers in Singapore and Argentina.

7.1 Comparing the precarity of domestic workers in Singapore and Argentina

My main finding is that, due to state legislations affecting the domestic work sector in Singapore and Argentina, domestic workers experience differently the dimensions and sub-dimensions of precarity. In a nutshell, in Argentina, domestic workers experience higher levels of economic precarity than affective and social precarity, and, in Singapore, domestic workers experience higher levels of affective and social precarity than economic precarity. Indeed, although in both states domestic workers' wages are notably low compared to workers in other activities, in Argentina the average wages of domestic work are situated at approximately 80% of the minimum wages of workers in other sectors of activities. Since only 20% of domestic workers in Argentina work full-time, it leaves 80% of them doing part-time or occasional work, which can explain the lower average salary of domestic workers compared to those in Singapore who all full-time workers. Also, in Singapore, domestic workers' wages are higher than in Argentina but since all domestic workers are live-ins, they do not have the expenses of housing, food, and transportation that live-outs domestic workers must bear in Argentina.

On the other hand, the money saving provided by the fact that all domestic workers in Singapore are foreign and obligated to live in their employer's home does not compensate for the negative aspects of their foreignness and compulsory live-in arrangements that represent the main factors contributing to the affective and social precarity experienced by domestic workers in Singapore. Since domestic workers cannot bring members of their family with them in Singapore, they are forced to live away from their families and friends for an extended period of time, in most cases a minimum of two years. They are discouraged from forging any romantic relationship for fear of losing their work permit in case of a pregnancy or for causing the break-up of a Singaporean family. The mandatory live-in arrangement that keeps them isolated in the home of their employers and the long workdays, especially for those who care for young children or elderly persons, makes it difficult for them to cultivate friendly ties and build new social networks. Some domestic

workers may not even enjoy a weekly day of rest for social gatherings if they accept an extra workday's pay in lieu of a day off for fear of displeasing their employer.

In Singapore, the authoritarian regime governs tightly the domestic sector through numerous policies and rules specifically meant to keep the 250,000 domestic workers as a transient, indispensable yet disposable workforce. To make sure that domestic workers leave Singapore at the end of their employment contract and follow the rules established during their stay, the regulations are clear, precise, and must obeyed by domestic workers and employers. Argentina is traditionally a more open society built on the successive waves of migrants coming from Europe in the 1800s and the 1900s and, later from neighboring countries in the 1950s up to the recent decades. For migrants who wish to remain in Argentina, their integration is facilitated by migration laws that allow them to become permanent residents and citizens after a few years in the country, a social integrative measure not offered to low-skilled migrant workers in Singapore.

The striking feature of the analysis of domestic work in Argentina is the distinction between the domestic workers who work formally because they are registered and those who work informally because they are not registered. Registered domestic workers in general enjoy better wages, health insurance and pension benefits, whereas the non-registered domestic workers experience higher levels of economic precarity with lower wages and no social security, pension benefits nor work rights except those provided by the universal system offered to all citizens of Argentina. In terms of the absence of work rights and entitlements, the situation of domestic workers in Singapore is comparable to unregistered workers in Argentina since in Singapore domestic workers do not contribute to the Central Provident Fund that covers all Singapore citizens.

On the one hand, considering the employment precarity, Argentina's domestic workers, whether registered and non-registered, share with Singapore's domestic workers the uncertainty and insecurity of employment since in both countries the employer can end the work relationship at will. The employment precarity is due to the temporary nature of the employment contract, whether verbal or written, in both countries. For registered domestic workers in Argentina and for domestic workers in Singapore, the employer is legally bound to make a severance payment to the worker when he/she decides to end the employment relationship and must provide some advance notice. This is not the case for non-registered domestic workers in Argentina who are let go without any legal severance pay obligation on the part of the employer.

In terms of wages, domestic workers' wages in Singapore are higher than those in Argentina, but, in both countries, domestic work wages are among the lowest compared to workers' wages in other sectors of the economy. By comparison, registered workers in Argentina enjoy an array of work rights and entitlements that could be calculated as economic gains (e.g., pension plans), but that are not available to domestic workers in Singapore. Once the domestic worker's employment contract in Singapore ends, all she has left with is the money she has been able to accumulate during her contract, including the remittances she has sent back home. In both Singapore and Argentina, the asymmetrical power relationship between employers and domestic workers affects the economic precarity (wages) and work conditions (hours of work, rest time, day off) since these are elements of negotiation between employers and their respective domestic worker whose leverage is limited due to the ample supply of domestic workers in both cases. In Singapore, the hands-off approach of the government in the matter of work conditions is based on the arguments

of flexibility and pragmatism that aim to consider the changing and specific needs of the households and the employers but neglects those of the domestic workers.

On the other hand, domestic workers in Singapore are much more prone to experience higher levels of affective precarity and social precarity because of their status as transient workers, their foreignness, and the compulsory live-in arrangement. In Argentina, registered and non-registered domestic workers can choose to work in a live-in or live-out arrangement. Because live-out arrangements are possible and common in Argentina, affective and social precarity is less likely to be experienced since live-out domestic workers have a daily access to the physical and emotional support of their familial or social networks. In Singapore, all domestic workers are migrants who cannot bring any member of their family with them. In Argentina only about 15% of domestic workers are external migrants. Even if many female domestic workers enter Argentina on their own, they may choose to have their family members join them once their situation is regularized and stabilized, especially if their homeland is part of the Mercosur regional bloc. They can hope to become Argentine citizens, a right not given to low skilled foreign migrant workers in Singapore, where only the group of foreign talent (high skilled workers) is given the opportunity to become permanent residents or Singapore citizens.

In Singapore, all domestic workers are full-time workers limited to work in the domestic work sector and for a single employer during their employment contract. The work permit system in place restricts their work experience to the domestic work, thus limits the development of their professional skills during their stay in Singapore, which can extend from two years or more if their employment contract is renewed. Since many female domestic workers are in their prime years, their twenties and thirties, the longer they remain in Singapore, the more their work experience and professional development are limited to the domestic work sector, with no possibilities of continuing their studies while in Singapore. The Work Permit that allows them to enter the country does not allow them to do any other work or to study within the educational Singapore system, except to attend cooking, computer, or English classes given by the few civil society organizations (CSOs) that exist to help and represent foreign workers during their stay in Singapore. In Argentina, domestic workers can be full-time, part-time, or occasional workers for one or multiple employers. They can diversify their work experiences or continue their studies if they wish to do so, although they may not have the time, energy or money to pursue studies. Domestic workers in Argentina enjoy a flexibility of work arrangements that domestic workers in Singapore do not, but this flexibility comes at the cost of low and fluctuating revenues but at least a choice is possible.

In terms of registration, it could be said that all domestic workers in Singapore are formally registered since their entry into Singapore is dependent on holding a valid Work Permit. The authorities are aware of their presence in the country, and they must return home at the end of their employment contract. In Argentina, only about 25 % of domestic workers are formally registered. Registration opens the door to healthcare insurance, pension benefits, and work rights in Argentina, but it does not in Singapore. Domestic workers in Singapore are only insured through the personal accident insurance package (AIP) purchased by their employers for the duration of their stay in Singapore. They do not contribute to the national social security regime (CPF). As mentioned previously, the Work Permit system in Singapore and the registration system in Argentina are the prerogative of the employer, creating the asymmetrical power relation that has multiple effects on their work conditions since negotiations happen within the private sphere of the home and are not

supported by legislation nor collective bargaining, except for registered domestic workers in Argentina.

In Argentina, informal work is not illegal. It is historically and socially accepted and remains a possible choice for employers and domestic workers, despite the state's efforts to encourage formal work arrangements. Because informal domestic work is possible and is the choice of most domestic workers and employers in Argentina, it constitutes the weaknesses of the legal framework of domestic work in Argentina, which combined with the state's institutional lack of capacity to fully enforce the legal framework of its domestic work sector, contribute to the high rate of informality. In Singapore, all laws, policies, and rules are strictly implemented and enforced by the centralized supervision of the Ministry of Manpower (MOM). In Argentina, the governance of the domestic work sector is shared by the Ministry of Labour and the Federal Tax Agency. Enforcement through inspections in the households that employ or are suspected to employ domestic workers constitute the weakness of the domestic work sector governance in Argentina.

7.2 Recommendations relating to the domestic work in Singapore

According to Transient Workers Count too (TWC2), a CSO that defends the rights of domestic workers in Singapore, the main complaints of domestic workers, which are generally not reported to authorities, are the following: a limited access to information and communication with other people, not being allowed to go outside, not having enough time to rest, having a heavy workload, and having no time off [the survey was before the mandatory weekly day off policy change] (TWC2 2011). The nature of the most frequent complaints supports my finding, that more than economic precarity, it is social and affective precarity that negatively affect the daily lives of domestic workers during their working experience in Singapore. Therefore, the compulsory live-in arrangement is a major stumbling block to alleviate domestic workers' affective and social precarity in Singapore.

I would recommend that the Singapore state consider the possibility of allowing domestic workers to choose between a live-in or live-out arrangement in order to diminish substantially the social and affective precarity they experience. At least, if a choice between a live-in or live-out arrangement was possible, domestic workers could enjoy a degree of freedom that would give them a better control over their social and affective life, their physical mobility, and their feeling of inclusion in the Singapore society during their stay in city-state. Of course, the housing costs being extremely high in Singapore, it would be difficult for domestic workers to live entirely on their own, but for those who would choose a live-out arrangement, co-rental arrangements with three or four domestic workers could be a realistic option. Recruiting agencies could be responsible for organizing such accommodations for those choosing to work in a live-out arrangement with other domestic workers. The state would have to give up to some extent its hands-off approach that presently allow it to transfer the full responsibility of the well-being and supervision of domestic workers to employers. It would need to become actively involved perhaps by involving, in the responsibility of the well-being and obedience to regulations, civil society organizations.

It is often argued that one reason why so few low-skilled Singapore women refuse to work in the domestic work sector is because employers prefer live-in workers who can be called at all times of the day and night. Live-in arrangements may be more convenient for some employers,

but not necessarily for all of them. Some middle-class employers, who cannot afford big homes that can accommodate comfortably many people, may be interested in hiring a live-out domestic worker if hiring a live-in domestic worker is perceived as an unwanted intrusion in their family's intimacy. For foreign domestic workers, a co-location among domestic workers may seem more appealing than a live-in arrangement, even if it means not being able to send as much remittances back home because of the extra expenses, and would contribute as an attractive feature of working in Singapore. Live-out arrangements may also reduce the amount of abuse cases since domestic workers would not be present in the home at all times of the day and night and would have the opportunity to report abuse more easily than when isolated in the employer's house. In sum, the possibility of live-out arrangements would diminish considerably the affective and social precarity of domestic workers, and a choice between a live-in and a live-out arrangement might even suit both some employers and domestic workers.

As a founding and active member of the Association of Southeast Asian Nations (ASEAN), Singapore should pride itself of honoring the ASEAN Declaration on rights and obligations of migrants by respecting its commitment to "Promote fair and appropriate employment protection, payment of wages, and adequate access to decent working and living conditions for migrant workers" and "Provide migrant workers, who may be victims of discrimination, abuse, exploitation, violence, with adequate access to the legal and judicial system of the receiving states" (Taran and Gächer 2015, 15). Through the regulations, obligations, and responsibilities it imposes on the employers of domestic workers, the Singapore state meets most of its commitments, but there is room for improvement. Regular inspections in households, face-to-face meetings with domestic workers and employers, regular surveys done by impartial survey firms on the satisfaction of domestic workers may be means to protect domestic workers. Finally, the state of Singapore should improve the access of domestic workers to its legal and judicial system who, when confronted with abuse and exploitation, must turn to the judicial sector to gain justice (Oh 2020). Oh argues that the state should help domestic workers to overcome the problems of legal representation, language barriers, loss of income during investigations and legal proceedings. This would reduce domestic workers' levels of anxiety, confusion, and helplessness and would alleviate the affective precarity of domestic workers facing such a situation.

In a smaller state such as Hong Kong, domestic workers benefit from substantial rights, such a guaranteed minimum wage, a 24-hour rest period, twelve paid statutory holidays yearly, a long-service payment after 5 consecutive years for the same employer, and they can enjoy a maternity leave and do not lose their job for getting pregnant (Paul 2018). Such domestic workers' rights and entitlements in Singapore are inexistent or strictly based on the good will of the employer. If Singapore wishes to continue attracting domestic workers, the legislator should perhaps follow Hong Kong's example in some of the rights and entitlements it offers its migrant domestic workers, especially since Hong Kong is Singapore's main competitor in the domestic work market. For example, by allowing domestic workers to keep their job while pregnant (for as long as possible) and enjoy a maternity leave if they get pregnant following a romantic involvement with a foreigner or Singapore man, female domestic workers would be treated as responsible and mature women. This measure would also diminish their level of affective precarity. Employers, no longer fearing the loss of their security bond, which would also be no longer needed, would no longer have any reason to illegally withhold important documents, such as work permit or passport, or illegally refuse to give their domestic worker a day off for fear of her getting

pregnant. Whether these recommendations would be acceptable to the authorities is highly improbable at the present time, but they are elements of policy change that perhaps should be examined if Singapore wants to keep on attracting a constant supply of domestic workers it needs to support its economic growth.

Finally, as argued by Paul (2018), Singapore should treat better their guest workers for normative and competitive reasons. Singapore likes to pride itself of being a First World country that wishes to attract the best and the most qualified migrants, so it should treat all its workers accordingly, foreign or not, low-skilled or not, otherwise Singapore will remain a stepping-stone for stepwise migrants looking for the better work opportunities elsewhere. Paul argues that a care drain, by opposition to brain drain, might ensue (Paul 2018) with devastating effects for Singaporean families having to spend time looking for and training a high turnover of domestic workers. Furthermore, by reducing the isolation of domestic workers in the occupation of domestic work, Singapore would reduce its risk of being targeted as a country that uses discriminatory measures against migrant workers, since isolating migrant workers in a specific occupational field is an ILO indicator of discrimination, as noted by Taran and Gächer (2015, 29). The success of the day-off campaign is evidence that Singapore is sensitive to issues that raise negative international criticism.

7.3 Recommendations for the domestic work sector in Argentina

From my close examination of the labour policies that regulate the domestic work sector in Argentina, I conclude that these labour policies and laws are no longer in themselves directly responsible for the precarity of domestic workers, whether nationals or migrants. Indeed, with the passing of Law 26, 844 in 2013, the state through its legislation has gone as far as possible to expand the scope of the labour laws to protect domestic workers since all domestic workers who work for one hour a week for an employer can qualify to be registered by their employer and access practically all the same rights and benefits as all other workers. However, I identify two major problems than need to be addressed to improve domestic workers rights and protection in Argentina.

The first major problem is the fact that the Law on Contract Employment (Ley de Contrato de Trabajo or LCT),[9] the national labour law, does not include domestic workers, even if the registered domestic workers benefit from all the same rights and social security benefits as other workers, except in matter of minimum wages. So why not include them in the LCT, especially at least for the vast majority of domestic workers who are Argentine citizens? If domestic workers were to be included in the LCT, they would be recognized and treated as regular workers deserving the same work rights and protection as all other workers, including the same level of minimum wages, a means to counter their economic precarity. The LCT defines the "contract of employment, rights and obligations of employers and employees, special contracts of employment (such as part-

[9] https://www.argentina.gob.ar/normativa/nacional/ley-20744-25552

time, fixed-term contracts, seasonal employment), remuneration and protection of wages, hours of work, public holidays and paid leave, maternity protection, minimum age and protection of young workers, suspension and termination of the contract of employment, transfer of enterprises" (Bronstein nd.). Registered domestic workers would then be fully protected and considered full-fledge regular workers, which the present regime of the Personal Household Staff Law (Law 26,844) does not accomplish.

In Argentina, the employment laws enforced by the National Ministry of Labour specify the minimum standards that employees are entitled to and employers must adhere to when entering into an employment contract, regardless of nationality or location. Once an employment contract has been entered into, the employer has an obligation to register any employment relationships in a Special Payroll Book, subject to periodic supervision by the Ministry of Labor (ShieldGeo). Not registering or wrongly registering a worker, either by omission of information or erroneous information, incurs sanctions. The fine corresponds to between 2 to 10 times the amount evaded (Art. 46. Ley 11.683). This means that if domestic workers were included in the Law of Contract Employment, national and migrant domestic workers alike would be fully covered, and employers not registering them would be sanctioned and fined, an incentive not in force at the present time for employers who refuse to register their domestic workers.

The second problem is the weakness of the implementation and enforcement of the labour laws that specifically govern the domestic work sector and contributes to the enduring high levels of informality that keeps domestic workers in their constant state of economic precarity. Tackling informality is the major challenge of the Argentine state to respect its commitments following its ratification of the Convention 189 in 2014. The state remains the main agent of change if higher levels of formalization of domestic workers are to be achieved. Leaving such agency strictly in the hands of the employers has proven to be ineffective, thus enforcement should be the priority.

Two measures could help enforcement by using a carrot and stick measures. First, if the government does not want to discourage registration by increasing the employer-worker's contributions, it could subsidize part of the contributions as a carrot measure. Second, as a stick measure, it could re-instate the presumption of the presence of a domestic worker and proceed to collect the social security contributions, thus forcing the employer to register the domestic worker.

At present, according to Tomei and Belser, there seems to be a lack of coordination between the inspection service of the institutions of social security (Federal Tax Agency) and the Ministry of Labour. The inviolability of the privacy of the home is argued to justify the lack of inspections of private homes, but, as highlighted by the ILO, there has to be some form of balance between "workers' right to protection and the right to privacy of households members by stipulating that, subject to national laws and regulations, member States can make special arrangements allowing for the inspection of private homes under clearly specified conditions" (Tomei and Belser 2011, 437). Even if home inspections were to be more numerous to monitor enforcement and compliance with labour laws with the consent of the household employer or a judicial authorization, inspectors' visits would only protect registered workers, leaving the non-registered workers vulnerable to abuse and exploitation since inspectors would not be aware of their employment. It is unlikely that non-registered workers would lodge formal complaints that

would necessitate inspections in private homes and/or legal sanctions against employers, making the employment of unregistered workers totally legal, since not illegal in practice.

Therefore, the crux of the problem remains the refusal of employers to register domestic workers in their employment. As Pereyra so rightly notes, formalization is proof of the employment relationship, which entails obligations for the employer and rights for the domestic worker and is also a "mechanism that threatens class privileges and inequalities strongly rooted in this occupation" (Pereyra 2017, 3). One solution for the State is to continue its efforts to convince more employers to register their domestic workers, despite the strong cultural acceptance of informal work by offering incentives (more tax deductions) or imposing stricter sanctions (fines). The state must also improve the quality and access of information so domestic workers get the updated and correct information on the advantages of formalization and counter the misinformation about the necessity to forego governmental subsidies (e.g., child allowance) or advantages (husband's healthcare coverage) when registered. According to Tomei and Belser, it is crucial that both employers and domestic workers be made aware of their obligations and rights through various channels: printed resources, web sites, mass media, etc. (2011, 30). Unfortunately, as expressed by Pereyra, "[T]here are no tried and true methods for achieving formalization in this sector [domestic work], whose regulation has proven complex worldwide" (2017, 2).

7.4 Concluding remarks

At the start of my study on domestic work, I proposed that, in Argentina and Singapore, the State, through the labour policies it puts in place and as the main actor attempting to formalize remunerated domestic work, effectively continues and/or intensifies precarious working conditions of domestic workers in these countries. I also posited two sub-hypotheses: that in Singapore, the precarity of domestic workers is due to the government’s hands-off approach towards domestic worker-employer relations, despite a highly regulated domestic work sector, and that, in Argentina, the formalization requirements in the country's labour policies exacerbate the precarity of domestic workers by inhibiting higher levels of registration among domestic work sector.

At the end of my study, I maintain my main hypothesis according to which labour policies intensifies the precarity of domestic workers in both states. I also confirm my sub-hypothesis regarding Singapore and recommend that the state should gradually let go its hands-off approach to domestic work and show its true concern for the well-being of female migrants workers within its borders who, through their invaluable work, contribute to Singapore's households and national prosperity as well as to their own individual family's well-being and homeland's national prosperity. As for Argentina, I review my sub-hypothesis as I recognize that, since 2013, the state has made considerable efforts in terms of legistation to include as many domestic workers as possible within the registration process, reducing its requirements for qualification to registration. However, now that it has done what it can in terms of legislation, it must pursue its efforts on the ground towards improving domestic workers' work conditions by exerting duress on recalcitrant employers that refuse to register them. Formalization offers domestic workers in Argentina incomparable advantages that domestic workers in Singapore can only dream of.

For Parrenas and Silvey, the fact that domestic work is viewed as an activity within a private sphere, negating its regular work status that would give way to rights and entitlements, the domestic worker is placed in an unequal dependency relationship in which employers can fire and deport domestic workers at will (2018, 433). The only way out of the predicament of precarity in which domestic workers find themselves, according to Parrenas and Silvey, is the "global recognition of domestic work as rights-bearing labor because the continued denial of such recognition can only result in the perpetuated precarity of domestic workers" (2018, 438). In sum, the reality on the ground is that domestic workers are women of low socio-economic status and educational attainment, denied the social rights and protection offered to all formal sector workers since their work is not recognized as regular work. They may be prone to abusive and exploitative employers who can take advantage of the asymmetrical power involved in the employment relationship because of insufficient state enforcement of existing laws or because of inexistent laws meant to offer domestic workers the same basic rights and protection enjoyed by all formal sector workers covered by a national labour law. The recognition of domestic work as regular work, which Parrenas and Silvey present as a remedy to the precarity of domestic workers, remains at the present in the realm of utopia as long as domestic work remains outside of a country's national labour law, which is the case in both Singapore and Argentina, thus domestic work is de facto not recognized as a regular form of work that merits the same protection and status as any other work.

The recognition of domestic work as regular work by the authorities, employers, and domestic workers themselves is key to improving the working and living conditions of domestic workers in both countries. The professionalization of some domestic workers through training programs combined with the implementation of state-subsidized childcare services in Global South states, as is done in the Global North, would offer (ex-)domestic workers better paid and valued work opportunities. Looking into the possibility of putting in place such public services by idenfiying the advantages and barriers to their implementation, offers an exciting venue for future research. If both states were to accept to increase their financial, social, and political involvement in day care facilities, some domestic workers could be trained to become day care workers, improving their monetary situation and professional status. Rather than limiting the human and labour rights, the personal occupational choices and professional trajectories experienced by present time domestic workers, the State would become an ally of a part of the domestic work labour force in its struggle towards less precarious and more satisfying working conditions in Singapore and Argentina.

References

Abrahamson, Peter. 2017. "Domestic migrant care workers in Argentina: Work as no other." Paper prepared for presentation to *Transforming Care Conference*, Polytecnico Milano, Milan, Italy, Thematic Panel 16: Working conditions and every-day life of migrant care workers in different care regimes, June 26, 2017.

Anderson, Bridget. 2001. "Just another job? Paying for domestic work." *Development* 9 (1): 25-33.

Anderson, Bridget. 2004. "Migrant Domestic Workers and Slavery." In *The Political Economy of New Slavery,* edited by Christian van den Anker, 107-117. UK: Palgrave Macmillan.

Andrews, George Reid. 1979. "Race versus Class Association: the Afro-Argentines of Buenos Aires, 1850-1900." *Journal of Latin American Studies* 11 (1): 19-39.

Arnold, Dennis, and Joseph R. Bongiovi. 2013. "Precarious, Informalizing, and Flexible Work: Transforming Concepts and Understandings." *American Behavioral Scientist* 57 (3): 289-308.

ASEAN Forum on Migrant Labour (AFML). 2017. "Towards achieving decent work for domestic workers in ASEAN." ILO Geneva, Switzerland. https://www.ilo.org/wcmsp5/groups/public/---asia/---ro-bangkok/documents/publication/wcms_631089.pdf. Accessed April 13, 2020.

Baker, Jim. 2014. *Crossroads A popular History of Malaysia and Singapore.* 3rd edition. Singapore: Marshall Cavendish Editions.

Bal, Charanpal S. 2015. "Production Politics and Migrant Labour Advocacy in Singapore." *Journal of Contemporary Asia* 45 (2): 219-242.

Bauleo, Fernanda M., Frank van Dijk and Katja Radon. 2018. "One's Workplace, Other's Home? Work and Health of Domestic Workers in Argentina." *Annals of Global Health* 84 (3): 450-458.

Bertranou, Fabio, and Luis Casanova. 2015. "Employment Formalization in Argentina: Recurring and New Challenges for Public Policies." *Munich Personal RePEc Archive*, MPRA Paper No. 68121. https://mpra.ub.uni-muenchen.de/68121/1/MPRA_paper_68121.pdf. Accessed April 13, 2020.

Bertranou, Fabio, Tomas Lukin, Mariana Sebastiani, and Luis Casanova. 2015. "Assessment and Perspectives on Policies for Employment Formalization in

Argentina." Conclusion from *the IV Seminar on the Informal Economy in Argentina*. ILO https://www.ilo.org/wcmsp5/groups/public/---americas/---ro-lima/---ilo-buenos_aires/documents/publication/wcms_459604.pdf. Accessed November 7, 2019.

Betti, Eloisa. 2018. "Historicizing Precarious Work: Forty Years of Research in the Social Sciences and Humanities." *International Instituut voor Sociale Geschiedenis* 63 (2): 273-319.

Blackett, A. 2011. "Introduction: Regulating decent work for domestic workers." *Canadian Journal of Women and the Law* 23 (1): 1-46.

Blofield, Marieke. 2012. *Care Work and Class: Domestic Workers' Struggle for Equal Rights in Latin America*. University Park, USA: Penn State University Press.

Blofield, Marieke, and Merita Jokela. 2018."Paid domestic work and the struggles of care workers in Latin America." *Current Sociology* 99 (4): 531-546.

Boris, Eileen. 2017. "Decent Work in the Home: Affect and Rights Talk." *Santa Clara Journal of International Law* 15 (1): 79-103.

Bosmans, Kim, Sarah Mousaid, Nele De Cuper, Stefan Hardonk, Fred Loucks, and Christophe Vanroelen. 2016. "Dirty work, dirty worker? Stigmatisation and coping strategies among domestic workers," *Journal of Vocational Behavior* 92 (February): 54-67.

Brites, Jurema. 2014. "Domestic service, affection and inequality: Elements of subalternity." *Women's Studies International Forum* 46 (September-October): 63–71.

Bromley, Ray, and Tamar Diana Wilson. 2018. "Introduction The Urban Informal Economy Revisited." *Latin American Perspectives* 45 (1): 4-23.

Bronstein, Arturo. nd. "National Labour Law Profile: Republic of Argentina," https://www.ilo.org/ifpdial/information-resources/national-labour-law-profiles/WCMS_158890/lang--en/index.htm Accessed June 10, 2021.

Butler, Judith. 2012. "Precarious Life, Vulnerability, and the Ethics of Cohabitation." *The Journal of Speculative Philosophy* 26 (2): 134-151.
Chen, Martha. 2012. *The Informal Economy: Definitions, Theories, and Policies*. WIEGO Working Paper 1. Cambridge, MA: Wiego.

Chillier, Gaston, and Ernesto Seman. 2011. "Argentina's Migration Solution." *America's Quarterley*, Issue: The New Brazil and the Changing Hemisphere. https://www.americasquarterly.org/node/2432. Accessed April 1, 2020.

Church, Peter. 2006. *A Short History of South-East Asia,* 4th edition. Singapore: John Wiley & Sons (Asia) Pte Ltd.

Constable, Nicole. 2015. "Migrant Motherhood, 'Failed Migration', and the Gendered Risks of Precarious Labour." *Trans-Regional and National Studies of Southeast Asia* 3 (1): 135-151.

Cortes, Rosalia. 2017. "Human Rights of Migrants and Their Families in Argentina as Evidence for Development of Human Rights Indicators A Case Study." *KNOMAD,* Working Paper 22. https://www.knomad.org/publication/human-rights-migrants-and-their-families-argentina-evidence-development-human-rights. Accessed January 26, 2021.

Courtis, Corina, and Maria Ines Pacecca. 2014. "Domestic work and international migration in Latin America: Exploring trajectories of regional migrant women in domestic service in Argentina." *Women's Studies International Forum* 46 (September-0ctober): 24-32.

Crawford, Charmaine. 2018. "Decolonizing Reproductive Labor: Caribbean Women, Migration, and Domestic Work in the Global Economy." *The Global South* 12 (1): 33-55.

De Casanova, Erynn Masi. 2013. "Embodied inequality: The Experience of Domestic Work in Urban Ecuador." *Gender and Society* 27 (4): 561-585.

Dodgson, Jennifer, and Hawyee Auyong. 2016. "Foreign Domestic Workers in Singapore: Social and Historical Perspectives." Lee Kuan Yew School of Public Policy. https://lkyspp.nus.edu.sg/docs/default-source/case-studies/fdws_in_singapore.pdf?sfvrsn=2ac5960b_2 . Accessed April 13, 2020.

D'Souza, Asha. 2010. "Moving towards Decent Work for Domestic Workers: An Overview of the ILO's Work." ILO Bureau for Gender Equality. Geneva, Switzerland. http://www.ilo.org/wcmsp5/groups/public/---dgreports/---gender/documents/publication/wcms_142905.pdf. Accessed April 26, 2021.

Duffy, Mignon. 2007. "Doing the Dirty Work Gender, Race and Reproductive Labor in Historical Perspective." *Gender & Society* 21, (3): 313-336.

Du Toit, Darcy. 2011. "Not work like any other: Towards framework for the reformulation of domestic workers' rights." *Industrial Law Journal* 32 (1): 1-18.

Esquivel, Valeria. 2010. "Care workers in Argentina: At the crossroads of labour market institutions and care services." *International Labour Review* 149 (4): 477-493.

Esquivel, Valeria and Francisca Pereyra. 2017. "Care workers in Argentina." *New Solutions: A journal of Environmental and Occupational Health Policy* 0(0): 1-21.

Esquivel, Valeria and Francisca Pereyra. 2018. "Care workers in Argentina." *New Solutions: A journal of Environmental and Occupational Health Policy* 27 (4): 462- 482.

Faur, Eleonor. 2011. "A Widening Gap? The Political and Social Organization of Childcare in Argentina." *Development and Change* 42 (4): 967-994.

Faur, Eleonor, and Francisca Pereyra. 2019. "Caring for children and the elderly in Argentina: A grammar of class and gender inequalities." *Women's Studies International Forum* 72 (January-February): 25-31.

Filgueira, Fernando, and Juliana Martınez Franzoni. 2019. "Growth to Limits of Female Labor Participation in Latin America's Unequal Care Regime." *Social Politics* 26 (2): 245-275.

Freire, Tiago. 2015. "How the 1978 foreign domestic workers law increased the labor supply of Singaporean women." *The Singapore Economic Review* 6 (5): 1-19.

Frost, Mark R., and Yu-Mei Balasingamchow. 2009. *Singapore A Biography*. Singapore: National Museum of Singapore and Editions Didier Millet.

Gorban, Débora, and Tizziani, Ania. 2014. "Inferiorization and deference: The construction of social hierarchies in the context of paid domestic labour." *Women's Studies International Forum* 46 (September-October): 54–62.

Gorban, Débora, and Ania Tizziani. 2019. "You can't have it all: Patterns of Gender and Class Segregation in Paid Domestic Work in the City of Buenos Aires." In *Living and Working in Poverty in Latin America, Governance, Development, and Social Inclusion in Latin America*, edited by Maria Eugenia Rausky and Mariana Chaves, 125-145. Switzerland: Palgrave Macmillan.

Government of Argentina. 2021. Ley de Contrato de Trabajo (Law on Contract Employment) https://www.argentina.gob.ar/normativa/nacional/ley-20744-25552 Accessed October 21, 2021.

Government of Singapore. 2021. Singapore Statutes Online Employment Act https://sso.agc.gov.sg/Act/EmA1968. Accessed October 21, 2021.

Government of Singapore. 2021. Singapore Statutes Online. Employment of Foreign Manpower Act https://sso.agc.gov.sg/Act/EFMA1990. Accessed October 21, 2021.

Gutierrez-Rodriguez, Encarnacion. 2014. "The Precarity of Feminisation On Domestic Work, Heteronormativity and the Coloniality of Labour." *International Journal of Politics, Culture, and Society* 27 (2): 191-202.

Guy, Donna J. 1981. "Women, peonage and industrialization: Argentina, 1810-1914." *American Research Review* 16 (3): 65-89.

Habib, Javier L. 2016. "Report on Citizen Law: Argentina." Eudo Citizenship Observatory, European University Institute. Country Report, RSCAS/EUDO-CIT-CR 2016/4. https://core.ac.uk/download/pdf/45687615.pdf. Accessed April 26, 2021.

Hardy, Jane Ann. 2016. "(Re)conceptualising precarity: institutions, structure and agency." *Employee Relations* 39 (3): 263-273.

Helper Choice. 2021. "Maid Salary in Singapore." https://www.helperchoice.com/c/maid/salary. Accessed February 23, 2021.

Hewison, Kevin, and Arne L. Kalleberg. 2012. "Precarious Work and Flexibilization in South and Southeast Asia." *American Behavioral Scientist* 57 (4): 395-402.

Hodges, Graham. 1994. *Across the Boundaries of Race and Class An exploration of Work and Family among Black Female Domestic Servants.* New York: Garland Publishing, Inc.

Hoerder, Dick. 2015. "Historical Perspectives on Domestic and Care-Giving Worker's Migrations: A Global Approach." In *Towards a Global History and Caregiving Workers,* edited by Dick Hoerder, Elise Nerderveen Meerkerk, and Silke Neunsinger, 61-109. Boston: Brill.

Huang, Shirlena, and Brenda S.A. Yeoh. 2007. "Emotional Labour and Transnational Domestic Work: The Moving Geographies of 'Maid Abuse' in Singapore." *Mobilities* 2 (2):195–217.

Huang, Shirlena, and Brenda S. A. Yeoh. 2015. "Foreign Domestic Workers in Singapore: A Neglected Social Issue?" In *50 Years of Social Issues in Singapore*, edited by David Chan, 167-203. Singapore: World Scientific Publishing Co.

Human Rights Watch. 2005. "Legal framework for Migrant Domestic Workers in Singapore," *Maid to Order: Ending abuse against domestic workers in Singapore*. https://www.hrw.org/report/2005/12/06/maid-order/ending-abuses-against-migrant-domestic-workers-singapore. Accessed May 20, 2021.

International Labour Organization (ILO). 2010. "Decent Work for Domestic Workers." International Labour Conference 99th Session, 2010. Report IV (1). International Labour Office, Geneva. https://libguides.ilo.org/domestic-workers-en/standards. Accessed July 2, 2020.

International Labour Organization (ILO). 2011. "C189 – Domestic Workers Convention, 2011 (No. 189)." https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO::P12100_ILO_CODE:C189. Accessed April 13, 2020.

International Labour Organization (ILO). 2013. "Domestic workers across the word: Global and regional statistics and the extent of legal protection." International Labour Office. Geneva. https://www.ilo.org/travail/Whatsnew/WCMS_173363/lang--en/index.htm. Accessed April 26, 2020.

International Labour Organization (ILO). 2014. "New law leads to new life for migrant domestic workers," https://www.ilo.org/global/about-the-ilo/newsroom/news/WCMS_329135/lang--en/index.htm. Accessed May 20, 2021.

International Labour Organization (ILO). 2019a. "Tackling vulnerability in the informal economy," *Development Centre Studies*. https://www.ilo.org/global/topics/employment-promotion/informal-economy/publications/WCMS_711804/lang--en/index.htm. Accessed June 14, 2021.

International Labour Organization (ILO). 2019b. "Public attitudes towards migrant workers in Japan, Malaysia, Singapore, and Thailand" https://www.ilo.org/asia/publications/WCMS_732443/lang--en/index.htm. Accessed May 17, 2021.

International Labour Organization (ILO). 2020. "Who are the domestic workers?" December 2020. https://www.ilo.org/global/topics/domestic-workers/who/lang--en/index.htm. Accessed April 26, 2021.

Islam, M. Rezaul, and Stefan Cojocaru. 2016. "Migrant Domestic Workers in Asia: Transnational Variations and Policy Concerns." *International Migration* 54 (1): 48-63.

Iyer, Avanti, Theresa W. Devasahayam, and Brenda S.A. Yeoh. 2004. "A Clean Bill of Health: Filipinas as Domestic Worker in Singapore." *Asian and Pacific Migration Journal* 13 (1): 11-38.

Jelin, Elizabeth. 1977. "Migration and Labor Force Participation of Latin American Women: The Domestic Servants in Cities." *Signs* 3 (1): 129-141.

Jokela, Merita. 2015. "Macro-Level Determinants of Paid Domestic Labour Prevalence: A Cross-National Analysis of Seventy-Four Countries." *Social Policy & Society* 14 (3): 385-405.

Jung, Bongsoo. 2016. "Promoting Employment of Foreign Migrant Workers - Foreign Domestic Workers in Singapore." *Korea University Law Review* 20: 105-122.

Kabat, Marina, Agustina Desalvo, and Julia Egan; translated by Richard Stoller. 2017. "The Tip of the Iceberg Media Coverage of 'Slave Labor' in Argentina." *Latin American Perspectives* 44 (6): 50-62.

Kalleberg, Arne L., and Kevin Hewison. 2013. "Precarious Work and the Challenge for Asia." *American Behavioral Scientist* 57 (3): 271-288.

Kashyap, Bela. 2015. "Who's in charge, the Government, the Mistress, or the Maid? Tracing the History of Domestic Workers in Southeast Asia." in *Towards a Global History of Domestic and Caregiving Workers*, edited by Dirk Hoerder, Elise van Nederveen Meerkerk and Silke Neunsinger, 346-365. Boston: Brill.

Koh, Chiu Yee, Charmian Goh, Kellynn Wee, and Brenda SA Yeoh. 2017. "Drivers of migration policy reform: The day off policy for migrant domestic workers in Singapore." *Global Social Policy* 17 (2): 188-205.

Lan, Pei-Chia. 2006. *Global Cinderellas Migrant Domestics and Newly Rich Employers in Taiwan*. London: Duke University Press.

Lan, Pei-Chia. 2008. "New Global Politics of Reproductive Labor: Gender Labor and Marriage Migration." *Sociology Compass* 2 (6): 1801-1815.

Lazar, Sian, and Andrew Sanchez. 2019. "Understanding labour politics in an age of precarity." *Dialectic Anthropology* 43: 3-14.

Levitsky, Steven, and Lucan A. Way. 2010. *Competitive Authoritarianism Hybrid Regimes after the Cold War*. New York: Cambridge University Press.

Liani, M. K. 2020. "The uncomfortable reality behind foreign domestic work in Singapore," *Kontinentalist.* https://www.kontinentalist.com/stories/foreign-

domestic-worker-abuse-insingapore#:~:text=The%20uncomfortable%20reality%20behind%20foreign%20domestic%20work%20in,workers%20%E2%80%94most%20of%20whom%20are%20Indonesian%20and%20women. Accessed May 20, 2021.

Lim, Clarence, and Chan-Hoong Leong. 2017. "Content Analysis on Singapore's Immigration Rhetoric in the Media." *International Perspectives in Psychology: Research, Practice, Consultation* 6 (3): 179-193.

Malhotra, Ragini Saira, Joya Misra, and Diego F. Leal. 2016. "Gender and Reproductive Labor Migration in Asia, 1960–2000." *International Journal of Sociology* 46 (2): 114-140.

Marin, Enrique. 2013. "Precarious work: An international problem." *International Journal of Labour Research* 5 (1): 153-168.

Masquelier, Charles. 2019. "Bourdieu, Foucault and the politics of precarity." *Distinktion, Journal of Social Theory* 20 (2):135-155.

McCann, Deirdre, and Jill Murray. 2014. "Prompting Formalisation through Labour Market Regulation: A 'Framed Flexibility' Model for Domestic Work." *International Law Journal* 43 (3): 319-348.

Meerkerk, Elise van Nederveen. 2017. "Temporary Service? A Global Perspective on Domestic Work and the Life Cycle from pre-industrial Times to the Present." *Geschichte und Gesellschaft* 43 (2): 217-239.

Meerkerk, Elise van Nederveen, Silke Neunsinger and Dirk Hoerder. 2015. "Domestic Workers of the World: Histories of Domestic Work as Global Labor History." in *Towards a Global History of Domestic and Caregiving Workers,* edited by Dirk Hoerder, Elise van Nederveen Meerkerk, and Silke Neunsinger, 1-24. Boston: Brill.

Mehta, Balwant Singh, and Ishwar Chandra Awasthi. 2019. "Measurement of Women's Work." In *Women and Labour Market Dynamics* edited by B. S. Mehta and I. C. Awasthi, 133-152. https://doi.org/10.1007/978-981-13-9057-9_6. Accessed April 13, 2020.

Ministry of Manpower (MOM). 2021. Passes and permits for foreign domestic workers. https://www.mom.gov.sg/passes-and-permits/work-permit-for-foreign-domestic-worker/key-facts. Accessed October 21, 2021.

Motakef, Mona. 2019. "Recognition and precarity of life arrangement: towards an enlarged understanding of precarious working and living conditions." *Distinktion: Journal of Social Theory* 20 (2):156-172.

Morgenbesser, Lee. 2020. *The rise of sophisticated authoritarianism in Southeast Asia*. Elements in Politics and Society in Southeast Asia. Cambridge, UK: Cambridge University Press.

Mourelo, Elva Lopez. 2020. "Covid-19 and domestic work in Argentina." ILO Country Office for Argentina Technical Report, International Labour Organization. https://www.ilo.org/wcmsp5/groups/public/---americas/---ro-lima/---ilo-buenos_aires/documents/publication/wcms_765142.pdf. Accessed April 10, 2021

Mundlak, Guy, and Hila Shamir. 2011. "Bringing Together or Drifting Apart? : Targeting Care Work as 'Work Like No Other'." *Canadian Journal of Women and the Law* 23 (1): 289-308.

Oh, Tessa. 2020. " The big read: For migrant workers in trouble, navigating S'pore's legal system can be a challenge," *Today*. https://www.todayonline.com/big-read/big-read-migrant-workers-trouble-navigating-spores-legal-system-can-be-challenge. Accessed May 20, 2021.

Organization for Economic Cooperation and Development (OECD). 2012. "Closing the Gender Gap: Act Now." OECD Publishing. *http://dx.doi.org/10.1787/9789264179370-en.* Accessed April 13, 2020.

Organization for Economic Cooperation and Development/ International Labour Organization (OECD/ILO). 2019. "Tackling Vulnerability in the Informal Economy." *Development Centre Studies*, OECD Publishing, Paris. https://www.ilo.org/wcmsp5/groups/public/---ed_protect/---protrav/---travail/documents/publication/wcms_711804.pdf . Accessed April 13, 2020.

Ortiz, Isabel, and Phippe Marcadent. 2016. "Social protection for domestic workers: Key policy trends and statistics." *Social Protection Policy Papers*, Paper 16. Social Protection Department in collaboration with Inclusive Labour Markets, Labour Relations and Working Conditions Branch. International Labour Office, Geneva. http://www.ilo.org/wcmsp5/groups/public/---ed_protect/---soc_sec/documents/publication/wcms_458933.pdf. Accessed April 26, 2021.

Palmary, Ingrid, and Thea de Gruchy. 2016. "How unpopular policies are made: Policy making for migrant women in South Africa, Bangladesh and Singapore." *Migrating out of Povery, Research Programme Consortium*, Working Paper 45. http://www.migratingoutofpoverty.org/files/file.php?name=wp45-palmary-and-de-gruchy-2016-how-unpopular-policies-are-made.pdf&site=354. Accessed April 26, 2021.

Parreñas Rhacel Salazar, and Rachel Silvey. 2018. "The Precarity of Migrant Domestic Work." *The South Atlantic Quarterly* 117 (2): 430-438.

Paul, Anju Mary. 2018. "Improve welfare of foreign domestic workers to prevent 'care drain." Channel News Asia. https://www.channelnewsasia.com/news/commentary/protecting-foreign-domestic-workers-maids-prevent-care-drain-10189326. Accessed February 23, 2021.

Pérez, Inés, and Santiago Canevaro. 2015. "Languages of affection and Rationality: Household Workers 'Strategies before Tribunal of Domestic Work, Buenos Aires, 1956-2013." *International Labor and Working-Class History* 88: 130-149.

Pereyra, Francisca. 2013. "The Restricted Access to Labor Rights of Domestic Workers in Argentina: An Approach from the Point of View of Employers." https://editorialexpress.com/cgibin/conference/download.cgi?db_name=IAFFE2013&paper_id=79&file_type=slides. Accessed April 26, 2021.

Pereyra, Francisca. 2017. "Domestic workers and social protection in Argentina: Advances and remaining challenges." ILO Working Papers Series ILO country Office for Argentina, Working Paper No. 15. https://www.ilo.org/wcmsp5/groups/public/---americas/---ro-lima/---ilo-buenos_aires/documents/publication/wcms_621361.pdf. Accessed April 26, 2021.

Pereyra, Francisca. 2019. " 'There is always someone else': Argentina's struggle to improve domestic workers labour conditions." *The Conversation.* https://theconversation.com/theres-always-someone-else-argentinas-struggle-to-improve-domestic-workers-labour-conditions-116702. Accessed October 18, 2021.

Pereyra, Francisca, and Ania Tizziani. 2014. "Differentiated experiences and working conditions in domestic service. Towards a characterization of labor segmentation of the sector in the city of Buenos Aires." *Trabajo y Sociedad* 23: 1-25.

Pereyra, Francisca, and Lorena Poblete. 2018. "Recent themes and Perspective in the Analysis of Domestic Work in Latin America: Reflections on Remaining Challenges and Questions." *Journal of Latino/Latin-American Studies* 9 (1): 65-71.

Pinho, Patricia de Santana, and Elizabeth B. Silva. 2010. "Domestic relations in Brazil Legacies and Horizons." *Latin American Research Review* 45, (2): 90-113.

Platt, Maria, Grace Bey, Brenda Yeoh, Choon Yen Khoo, and Theodora Lam. 2017. "Debt, Precarity and Gender: male and female temporary labour migrants in Singapore." *Journal of Ethnic and Migration Studies* 43 (1): 119-136.

Poblete, Lorena. 2015. "New Rights, Old Protections: The New Regulation for Domestic Workers in Argentina." *Working Paper Series*, McGill and Labour Law and Development Research Laboratory. https://www.mcgill.ca/lldrl/files/lldrl/poblete_final.pdf. Accessed April 26, 2021.

Poblete, Lorena. 2018a. "The influence of the ILO Domestic Workers Convention in Argentina, Chile and Paraguay." *International Journal of Comparative Labour Law and Industrial Relations* 43 (2): 177-202.

Poblete, Lorena. 2018b. "The ILO Domestic Workers Convention and regulatory reforms in Argentina, Chile and Paraguay. A comparative study of working time and remuneration regulations." *International Labour Review* 157 (3): 435-459.

Poblete, Lorena. 2019. "The Different Meanings of Formalisation. Experiments for the South: The Case of Argentina." In *Re-imagining Labour Law for Development Informal Work in the Global North and South*, edited by Diamond Ashiagbor, 167-189. Oxford: Hart Publishing.

Poblete, Lorena. 2020. "Formalisation as a judicial claim: the case of paid domestic workers in Argentina." *Cidades, Comunidades e Territorios* 40 (June): 33-46.

Rahman, Mizanur Md. 2017. *Bangladeshi Migration to Singapore A Process-Oriented Approach.* Singapore: Springer Nature Singapore Pte Ltd.

Razavi, Shahra, and Silke Staab. 2010. "Underpaid and overworked: A cross-national perspective on care workers." *International Labour Review* 149 (4): 407-422.

Rollins, Judith. 1985. *Between Women Domestics and their Employers.* Philadelphia: Temple University Press.

Romero, Mary. 2018. "Reflections on Globalized Care Chains and Migrant Women Workers." *Critical Sociology* 44 (7-8): 1179-1189.

Ronconi, Lucas. 2012. "Globalization, Domestic Institutions, and Enforcement of Labor Review: Evidence from Latin America." *Industrial Relations* 51(1): 89-105.

Salary expert. Salary Argentina https://www.salaryexpert.com/salary/job/factory-worker/argentina

Sarti, Raffaella. 2015. "Historians, Social Scientists, Servants, and Domestic Workers: Fifty Years of Research on Domestic and Care Work." In *Towards a*

Global History and Caregiving Workers, edited by Dick Hoerder, Elise Nerderveen Meerkerk, and Silke Neunsinger, 25-60. Boston: Brill.

Shahvisi, Arianne. 2018. "Hermeneutical injustice and outsourced domestic work." *Women's Studies International Forum* 69: 18-25.

Shumway, Nicolas. 1993. *The invention of Argentina*. Berkeley: University of California Press.

Smith, Peggie R. 2012. "Work like any other, work like no other: establishing decent work for domestic workers." *Employee Rights and Employment Policy Journal* 51: 158-198. *Legal studies research paper series* Paper no. 12-05-30. Washington University in St. Louis, School of Law.

Soong, Roland. 2000. "Domestic Workers in Latin America." *Zonalatina.com*. http://www.zonalatina.com/Zldata112.htm. Accessed January 25, 2021.

Standing, Guy. 2011. *The Precariat The new dangerous class*. London: Bloomsbury Press.

Taran, Patrick, and August Gächter. 2015. *Discrimination against Migrant Workers Global Trends, Responses, Challenges and Ways Forward Today and Tomorrow*. CERD Geneva.

http://www.globalmigrationpolicy.org/articles/Events/CERD%20briefing%20note%20Discrimination%20v%20Migrants%20AG-PT%20aug2015.pdf. Accessed June 9, 2021.

Tayah, Marie-José. 2016. "*Decent work for migrant domestic workers: moving the agenda forward*." International Labour Office, Conditions of Work and Equality Department: 1-108. Geneva: ILO. http://www.ilo.org/wcmsp5/groups/public/---ed_protect/---protrav/---migrant/documents/publication/wcms_535596.pdf. Accessed April 26, 2021.

Teo, Youyenn. 2013. "Support for Deserving Families: Inventing the Anti-welfare Familialist State in Singapore." *Social Politics: International Studies in Gender, State and Society* 20 (3): 387-406.

Tomei, Manuela. 2011. "Decent Work for Domestic Workers: Reflections on Recent Approaches to Tackle Informality." *Canadian Journal of Women and the Law* 23 (1): 185-211.

Tomei, Manuela, and Patrick Belser. 2011. "New ILO Standards on decent work for domestic workers: A summary of the issues and discussions." *International Labour Review* 150 (3/4): 431-438.

Transient workers count too (TWC2). 2011. "What are the main complaints of domestic made by foreign domestic workers?" Fact sheet- Foreign domestic workers in Singapore (complaints and abuses) – TWC2.pdf https://twc2.org.sg/2011/11/16/fact-sheet-foreign-domestic-workers-in-singapore-complaints-and-abuses/. Accessed November 22, 2021.

US News and World Report. 2020. "Best Countries 2020Global rankings, international news and data insights." https://www.usnews.com/news/best-countries/overall-rankings. Accessed April 13, 2020.

Uttal, Lynet, and Mary Tuominen. 1999. "Tenuous relationships Exploitation, Emotion, and Racial Ethnic Significance in Paid Child Care Work." *Gender and Society* 13 (6): 758-780.

Völgyi, Katalin. 2019. "A succesful Model of State Capitalism: Singapore." In *Seeking the Best Master State ownership in the Varieties of Capitalism*, edited by Miklos Szanyi, 275-296. Plymouth, UK: Central European University Press. https://www.jstor.org/stable/10.7829/j.ctv138wqt7.13?seq=2#metadata_info_tab_contents. Accessed April 26, 2021.

Vosko, Leah F. 2009. *Managing the Margins: Gender, Citizenship, and the International Regulation of Precarious Employment*. Oxford: Oxford University Press.

WageIndicator.org. "Salary, Minimum Wage, Regular Pay - Argentina." https://wageindicator.org/salary/minimum-wage/argentina/. Accessed April 30, 2021.

World Bank Group. 2018. *The State of the Social Safety Nets 2018* https://www.worldbank.org/en/topic/socialprotectionandjobs/publication/the-state-of-social-safety-nets-2018. Accessed January 29, 2020.

Yang, Hui, PeigdonYang, and Shaohua Zhan. 2017. "Immigration, Population, and Foreign Workforce in Singapore: An Overview of Trends, Policies, and Issues." *Humanities & Social Studies Education* (HSSE) online 6 (1): 10-25. https://dr.ntu.edu.sg/bitstream/10356/143315/2/Immigration%2C%20Population%2C%20and%20Foreign%20Workforce%20in%20Singapore.pdf. Accessed October 21, 2021

Yea, Sallie. 2019. "Secondary Precarity in Asia: Family Vulnerability in an Age of Unfree Labour." *Journal of Contemporary Asia* 49 (4): 552-567.

Yeoh, Brenda S. A. 2013. "Upwards ’or ‘Sideways ’cosmopolitanism? Talent/labour/ marriage migrations in the globalising city-state of Singapore." *Migration Studies* 1 (1): 96-116.