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### **STORY BEHIND THE CLOSED DOORS: DECENT WORK PRACTICE AMONG THE MIGRANT DOMESTIC WORKERS IN SINGAPORE AND ITALY**

*M. Rezaul ISLAM, Stefan COJOCARU, Zulkanain Abdul RAHMAN,  
Abu Bakar SITI HAJAR , Lili Yulyadi Bin ARNAKIM*

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# Story behind the Closed Doors: Decent Work Practice among the Migrant Domestic Workers in Singapore and Italy

M. Rezaul ISLAM<sup>1</sup>, Stefan COJOCARU<sup>2</sup>, Zulkanain Abdul RAHMAN<sup>3</sup>,  
Abu Bakar SITI HAJAR<sup>4</sup>, Lili Yulyadi Bin ARNAKIM<sup>5</sup>

## Abstract

The objective of this study was to present comparative findings of the decent work practice (the ILO Convention 189) among the migrant domestic workers (MDWs) in two countries e.g., Italy and Singapore. The study covered three main aspects of these decent work practices, such as working hours and annual leave, maternity protection, and minimum wage. The study was based on a content analysis method. The search for relevant literature was completed in two stages. First, we examined peer-reviewed articles found in electronic databases using keyword searches; secondly, we used the ‘snowball’ method for searching the journal articles and published reports. The results showed that both countries were following the provisions of the decent work practices, but the situation in Italy was found much better than in Singapore. Apparently, the study found a large difference between the written provisions and the real practice in both countries. As a result, in many cases the MDWs in both countries were facing terrific challenges to get their expedient working conditions, proper working hours, annual leave, maternity protection and fair wage. The finding would be important guideline to the policy makers, human rights practitioners and academics.

*Keywords:* Italy, Singapore, domestic workers, ILO Convention 189, decent work, human rights.

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<sup>1</sup> Institute of Social Welfare & Research, University of Dhaka, BANGLADESH & Department of Social Administration & Justice, University of Malaya, MALAYSIA, E-mail: rezauldu@gmail.com

<sup>2</sup> Alexandru Ioan Cuza University of Iasi, Department of Sociology and Social Work, Iasi, ROMANIA. E-mail: contact@stefancojocar.ro

<sup>3</sup> University of Malaya, Department of History, Malaysia, MALAYSIA, E-mail: zulkana@um.edu.my

<sup>4</sup> University of Malaya, Department of Social Administration & Justice, MALAYSIA, E-mail: shajar@um.edu.my

<sup>5</sup> University of Malaya, Department of South East Asian Studies, MALAYSIA, E-mail: yulyadi@um.edu.my

## Introduction

The Domestic Workers Convention 189 is one of the milestones in human rights history that provides protections for the domestic workers (DWs). It represents a significant breakthrough in the labor rights, women's rights, and children's rights (Human Rights Watch, 2013). There are some other laws and conventions such as the International Labour Law, the UN Convention on the Elimination of All Forms of Discrimination against Women (CEDAW), and the UN International Covenant on Civil and Political Rights (ICCPR) that cover the rights and protections of the MDWs (Islam & Cojocar, 2016). In June 2011, the International Labour Conference (ILC), the central policy making organ of the International Labour Organization (ILO), adopted the Convention 189 and the Recommendation 201 concerning decent work for domestic workers (DWs). On September 5, 2013, this Convention entered into legal force (Human Rights Watch, 2013). Indeed, the convention realizes the demands of ILO's political agenda of 'Decent Work,' which has sought since the 1990s to bring workers employed in the informal sector of the economy more under the protection of ILO standards (Visel, 2013).

The Convention 189 is important for various reasons. Carls (2012) mentioned that this is an important step forward in promoting fair terms of employment and decent working and living conditions, the respect of human and fundamental labour rights as well as access to social protection for DWs. It is directed at protecting people employed in unregulated employment relationships within the informal economy worldwide, where international labor standards or national labor regulations have not been well enforced historically (Visel, 2013). Its central principle is equal treatment compared to other workers, not least also with regard to the payment of national minimum wages (where these exist). It includes the rules for live-in employment (privacy, accommodation etc.) and payments in kind, maximum working hours and on-call work, minimum rest times and paid annual leave, the right to a safe and healthy working environment, as well as social security and maternity protection against harassment and violence. Visel (2013) wants to see it as a global political response to the debate around transnational care and domestic work.

Migrant domestic workers (MDWs) comprise a significant proportion of the migrant labour force in the world (Islam & Cojocar, 2016). The ILO (2015) estimated that there are 232 million migrant workers around the world. The numbers represent an increase of more than 19 million since the mid-1990s. According to the current estimates, there are 67.1 million DWs in the world, of whom 11.5 million are international migrants. This represents 17.2% of all DWs and 7.7% of all migrant workers worldwide. In other words, almost every sixth DW in the world was an international migrant in 2013 (ILO, 2015). The high-income countries accounted for 9.1 million of the estimated 11.5 million MDWs

globally, amounting to nearly 80% of the total. Most strikingly, domestic work accounts for 7.5% of women's wage employment worldwide and a far greater share in some regions (ILO, 2013). In Asia, at least 21.5 million women and men work in private households (or 41% of all DWs worldwide) (ILO, 2011). Globalization has contributed to the ever increasing such international labor migration in the past several decades (Cheng, 2014). On the other hand, the ILO (2015) notes that globalization, demographic shifts, conflicts, income inequalities and climate change will encourage ever more workers and their families to cross borders in search of employment and security. The reason of recruiting paid DWs in Asia and Europe is far different. In Asia, the demand of DWs is mostly related with household works. Tyner (1999) argues that within Asia, the economic and demographic trends have conjoined to produce a significant demand for domestic work. In Europe, attention has tended to be paid to the requirement for paid DWs to enable parents, women in particular, to work outside the home, but increasingly the focus is on the provision of care for older people within the context of the ageing EU population (Anderson, 2007).

According to the most recent global and regional estimates produced by the ILO (2013), at least 52.6 million women and men above the age of 15 were DWs in their main job. This figure represents some 3.6% of global wage employment. Women comprise the overwhelming majority of DWs: 43.6 million workers or some 83% of the total. The MDWs are also increasing in both Singapore and Italy. Beginning in the 1980s, the Government of Singapore allowed a large number of foreign laborers, or foreign domestics to work in the country. There are multiple reasons: economic restructuring, the expansion of the service industry, the increased participation of middle-class women in the labor force, the shortage of unskilled labor for low-waged jobs, the benefits of low-cost foreign labor in a competitive global economy, and the lack of a national care policy. According to the Ministry of Manpower, there are approximately 211,000 foreign domestics in Singapore on work permits as of June 2013. In a recent data, the Asia Research Institute, Migration out of Poverty and UK Aid (2013) jointly reported this number is 209,600. In Italy, official statistics account for 1.5 million DWs: 875,000 in formal and 650,000 in informal employment. The share of MDWs is estimated at 87%. Yeoh, Huang and Devasahayam (2004) reported that in 2004, there was one live-in domestic for every seven households. Now, there is one for every five households (Tan, 2013; Cheng, 2014). While the number of Italians has increased very slightly – from 133,963 workers in 1994 to 173,870 in 2011 (+22.9%) – the number of migrant workers during the same period has increased from 52,251 to 707,832 (+92.6%), which represents 80% of the total number of workers in the sector in 2011. Domestic work in particular has become the main sector of employment for migrant women in Italy over the past decade, with more than one in two foreign women (51.3%) employed as a DW or family assistant in 2011 (ILO, 2011)

Instead of ILO's Convention 189 (decent work practice), many governments have systematically denied the MDWs from the key labor protections that are enjoyed by other workers. In many countries, DWs are excluded from guarantees of a minimum wage, overtime pay, rest days, annual leave, workers' compensation, social security, and fair termination of contracts. This denies DWs equal protection under the law and has a discriminatory impact on women and girls' DWs (Human Rights Watch, 2007). According to the ILO, almost 30% of the world's DWs are employed in countries, where they are completely excluded from national labor laws (Human Rights Watch, 2013). Human rights violations against these women by their employers are prevalent. A number of human rights organizations such as the Human Rights Watch and Anti-Slavery point out that these women are victims of forced labor, debt bondage, involuntary servitude, and trafficking (Becker, 2012). It is noted that Philippines is the only country in Asia and ASEAN who ratified the Convention 189 in 2012. However, Singapore did not ratify this convention yet. On the other hand, Italy is the 4th ILO Member State and the first EU member State to ratify this convention in 2013. Cheng (2014) argued that domestic service is now a form of modern day slavery. In this perspective, this paper attempts to unfold the features of two countries' decent work practice, one is Italy from Europe and another is Singapore from Asia

## **Conceptual framework and literature review**

### ***Migrant domestic workers***

According to the ILO Domestic Workers Convention, 2011 (No. 189): "(a) the term domestic work means work performed in or for a household or households; (b) the term domestic worker means any person engaged in domestic work within an employment relationship; (c) a person who performs domestic work only occasionally or sporadically and not on an occupational basis is not a domestic worker." (ILO, 2011). According to the International Labour Organization (ILO, 2013) and the International Organization for Migration (IOM, 2009, 12), "MDWs are any persons moving to another country or region to better their material or social conditions and improve the prospect for themselves or their family, engaged in a work relationship performing 'in or for a household or households'." A number of words are synonymized with DW such as 'household worker', 'domestic helper', and carer (see ILO, 2010). A DW can be employed part-time or full-time in a household or private residence. It may comprise various tasks such as cooking, cleaning, washing and other housework, gardening, car services and guarding a house as well as care work dealing with children, elderly or disabled persons (Carls, 2012; Islam & Cojocaru, 2016).

There is a variation of the definitions of the DWs, which are mentioned in two countries' laws and related documents. According to the Ministry of Manpower in Singapore, the MDW is employed from an approved country (Malaysia, Philippines, Indonesia, Thailand, Myanmar, Sri Lanka, India and Bangladesh). The Employment of Foreign Manpower Act in Singapore mentions that DW means a work permit holder employed in or in connection with the domestic services of any private premises. The Workplace Safety and Health (Incident Reporting) Regulations in Singapore mentions that DW means "any person employed in or in connection with the domestic services of any private premises. According to the Employment Act 2009 in Singapore, DW means any house, stable or garden servant or motor car driver, employed in or in connection with the domestic services of any private premises. Under the Italian law, domestic work, for both Italian citizens and immigrants, is governed by the provisions of the Italian Civil Code (articles 2240–2246). The Domestic Labour Law (law no 339 of 1958 amended in 2007) defines 'domestic worker' as any person engaged for the 'functioning of family life'. According to this law, a DW must work at least 4 hours for the same employer daily. The Law no. 189 of 2002 (also known as the 'Immigration Law') mentions that the non-EU persons who wish to live and work in Italy must enter into a work contract (for at least 25 hours per week) before leaving their own country of origin and entering Italy. Once the migrant is admitted to live and work in Italy, with reference to domestic work, the rules applicable are the same as those provided for Italian citizens (Thomson Reuters Foundation for the Trust Women Conference, 2012).

During the past decade, the feminist scholars have published a wide spectrum of literature on live-in foreign domestics (Anderson, 2000; Bakan & Stasiulis, 2005; Hondagneu-Sotelo, 2007; Lan, 2006; Parrenas, 2001; Verma, 2010; Cheng, 2014). These studies examine domestics' complicated relationship with their employers, the gendered nature of their work, the changing relationship with their families, immigration regulations governing migrant domestics, and their unequal positions in local, national, and global hierarchies. Visel (2013) describes migrant working process as the transnational care migration. He mentioned that research into the topic and the wider context has expanded rapidly over recent years. Visel claimed that the studies on MDWs look the qualitative analyses from a micro-level, it often fails to consider phenomena on a macro and meso-level. Parreñas (2001) argued that the DWs reach their work destinations through various routes, and are placed in households through agencies, or through governmental recruiting programs, or even through private contacts or networks as well as via religious connections.

In Singapore, a MDW needs to meet four requirements to get a domestic job. The employee must be female; the age must be from 23 to 50 years old at the time of application; employee must be from an approved source country or territory, including Bangladesh, Hong Kong, India, Indonesia, Macau, Malaysia, Myanmar,

Philippines, South Korea, Sri Lanka, Taiwan, and Thailand; and should have minimum 8 years of formal education with a recognized certificate. The primary sources of law regulating migrant domestic work in Singapore are the Employment of Foreign Workers Act and the Employment Agencies Act. Usually, the foreign workers enter Singapore through three types of work passes: an 'employment pass' for professionals and highly-skilled workers, an 'S-pass' for middle-level workers such as technicians, and a 'work permit' for unskilled or semi-skilled workers, including DWs. It is noted that the main labor law in Singapore, the Employment Act and the Workmen's Compensation Act, excludes DWs from their protections, but apply to most other skilled and unskilled foreign workers. Singapore has demonstrated concern about abuse of MDWs and responded with reforms. The country amended its Penal Code in 1998 to increase by 1.5 times the penalties applied to employers convicted of physical abuse, sexual abuse, or wrongful confinement of DWs. In Italy, domestic work is any work carried out within a household, including giving assistance to disabled people or those with handicaps who cannot fully cater to their own basic needs. A carer for the disabled or elderly is known as a *badante*, while a worker performing household and cleaning tasks is known as a *colf*. A *badante* or *colf* needs to have an academic or professional training or obtained any specific qualifications. If they have such qualification, they need a corresponding entry clearance permit (which is called *nulla osta*) can be requested by individual private employers. After receiving a *nulla osta*, they should continue with the visa procedure for normal employment. The employers can apply for a DW if it can be proven that the employer has sufficient income to cover the worker's pay, food, accommodation and national insurance contributions. However, there is a wide range of variations in terms of the country context, nature of work, requirements, rules and regulations related MDWs between two countries though there is similarity of these two countries in terms of their socio-economic conditions.

We have reviewed a wide range of literatures, which cover a bulky list about MDWs' sufferings, exploitations and barbarisms. These include the changes to the contract without the worker's agreement, wage discrimination, falsified wage receipts, discrimination based on country of origin, locked inside the employer's home, abandonment, healthcare access problems, ban on union membership, invasions of privacy, excessive trial periods, language barriers, etc. The DWs face the risk of human rights violations not only in the workplace, but also at various stages of the work cycle, such as during recruitment, placement and return to their home town (ILO, 2006). It demonstrates that tying live-in domestics to their employers for employment and immigration status makes women DWs vulnerable to potential abuse and exploitation. Through an overview of 70 countries, ILO (2013) reported over two thirds (65%) of the countries either have labour legislation that covers the working conditions of the DWs in the same manner as those of other workers, and 20% of the countries exclude DWs from the national

labour laws and provide no other explicit legal protections. Globally, the MDWS often work long hours, have poor remuneration, and little access to social protection. Their isolation and vulnerability as workers is made more complex by their invisibility in private homes and their dependence on the good will of their employers (D'Souza, 2010, Warnecke & Ruyter, 2012; Cojocaru, Islam, & Timofte, 2015). Compared to formal workers, they are less likely to work at a single address, making them harder to track; the lack of official statistics accounting for informal workers contributes to their invisibility (Tomei, 2011). Numerous studies describe the living and working conditions of migrants in private households (e.g. Anderson, 2000; Hondagneu-Sotelo, 2001; Lutz, 2007, 2008).

### ***Decent work practice***

The Decent Work Agenda was initially promoted by ILO's former Director-General, Juan Somavía, in 1999. It stresses the inclusion of workers 'beyond the formal labor market [...], unregulated wage workers, the self-employed, and homeworkers' (ILO, 1999). The literature stretches a big distance about the concept 'decent work'. Owens (2002), and Bletsas & Charlesworth (2013) mentioned that decent work is a value-laden concept, porous and open to contestation. It is used to express a conception of labour as a social goal rather than a purely economic activity. In domestic policy debates, this term has been used as fair work and good jobs more commonly than decent work. Bletsas and Charlesworth (2013) argued that this phrase is synonymous in everyday language, but have different implications in labour debates. ILO has been using this concept since 1998 that elasticities this as a social context including the employer–employee relationship. Wingfield-Digby (2008) mentioned that it has developed a growing literature on the topic, concretising the expansive understanding of decent work. According to ILO (2012), decent work sums up the aspirations of people in their working lives such as opportunities for work that is productive and delivers a fair income, security in the workplace and social protection for families, better prospects for personal development and social integration, freedom for people to express their concerns, organize and participate in the decisions that affect their lives and equality of opportunity and treatment for all women and men. The Box 1 provides the key provisions of the decent work practice (Convention 189).



Box 1: Key provisions of the Convention 189

The Domestic Workers Convention (C 189) requires governments to provide domestic workers with the same basic labor rights as those available to other workers, to protect domestic workers from violence and abuse, to regulate private employment agencies that recruit and employ domestic workers, and to prevent child labor in domestic work. The following is a brief summary of its provisions:

Article 3: domestic workers should enjoy the ILO fundamental principles and rights at work: 1) freedom of association; 2) elimination of forced labor; 3) abolition of child labor; 4) elimination of discrimination

Article 4: protections for children, including a minimum age and ensuring that domestic work by children above that age does not interfere with their education

Article 5: protection from abuse, harassment, and violence

Article 6: fair terms of employment, decent working conditions, and decent living conditions if living at the workplace

Article 7: information about terms and conditions of employment, preferably in written contracts

Article 8: protections for migrants, including a written job offer before migrating and a contract enforceable in the country of employment. Countries should cooperate to protect them and specify terms of repatriation

Article 9: prohibits confinement in the household during rest periods or leave, and ensures domestic workers can keep their passports/identity documents

Article 10: equal treatment with other workers with regards to hours of work, overtime pay, and rest periods, taking into account the special characteristics of domestic work;

Article 11: minimum wage coverage where it exists

Article 12: payment at least once a month and a limited proportion of “payments in kind”

Article 13: right to a safe and healthy working environment (can be applied progressively)

Article 14: equal treatment with regard to social security, including maternity protection (can be applied progressively)

Article 15: oversight of recruitment agencies including investigation of complaints, establishing obligations of agencies, penalties for violations, promoting bilateral or multilateral cooperation agreements, and ensuring recruitment fees are not deducted from domestic workers’ salaries

Article 16: effective access to courts

Article 17: effective and accessible complaints mechanisms, measures for labor inspections, and penalties.

Article 18: each Member shall implement the provisions of this Convention, in consultation with the most representative employers and workers organizations.

The accompanying Domestic Workers Recommendation (No. 201) provides member states with non-binding guidance for strengthening protections for domestic workers and ensuring conditions of decent work.

*Human Rights Watch (2011)*

We have seen a disconsolate literature from the ILO and academics on the objectives and application of decent work practice among DWs. We would agree that there is a vast number of studies published on the livelihoods, rights and exploitations of the MDWs, but a very few are published in the scholarly journals on the decent work practice. The ILO (2012) mentioned that decent work is endorsed by the international community as being productive work for women and men in conditions of freedom, equity, security and human dignity. This involves opportunities for work that is productive and delivers a fair income; provides security in the workplace and social protection for workers and their families; offers better prospects for personal development and encourages social integration; gives people the freedom to express their concerns, to organize and to participate in decisions that affect their lives; and guarantees equal opportunities and equal treatment for all. The aim is inclusion of personal development and social integration, recognizes the relationship between paid and unpaid work as critical for the realisation of gender equality. The Decent Work Agenda has four strategic goals: social dialogue, extended social protection, rights at work and job

creation (ILO, 1999). Visel (2014) found that ILO has been increasingly cooperating with diverse civil society actors with its decent work practices. Obviously, a gender equality is 'at the heart' of decent work (ILO, 2009). As Owens (2002) argues that this helps to 're-evaluate of the unpaid work' inevitably involves a 'reassessment of the relation of paid and unpaid work and a reworking' of the divide between them. The Human Rights Watch (2013) states that the new standards oblige governments that ratify the convention to protect DWs from violence and abuse, to regulate private employment agencies that recruit and employ DWs, and to prevent child labor in domestic work. According to the ILO (1999), 'decent work' has the following characteristics: (1) there should be sufficient work for all to have full access to income-earning opportunities; (2) it generates an adequate income; (3) workers' rights are protected in it; (4) it is productive, not just existing as 'work for work's sake'; (5) it provides adequate social protection.

ILOs' decent work practice has been robustly criticized on grounds of poor working conditions and exploitation in many countries in the world (Mehotra & Biggeri, 2002; Owens, 2002; Tipple, 2006; van der Ham et al., 2014; Visel, 2014; D'Souza, 2010, Warnecke & Ruyter, 2012; Islam & Cojocar, 2016; Lutz, 2008; Gomes, 2011). Tipple (2006) conducted a study (in four cities in three continents: Cochabamba, Bolivia; New Delhi, India; Surabaya, Indonesia; and Pretoria, South Africa) on the decent work practice of the informal sector and home-based enterprises (HBEs). He found that HBE operators mostly have working days ranging between 9 and 13 hours, six or seven days per week. All these mean or modal values constitute excessive hours under the concept of 'decent work'. Gomes (2011) showed how the images of foreign maids are dramatised, reconstructed and consumed in various discursive forms by various social agents in Singapore. Robinson (2006) points to the blind spots in ILO's international labor standards in this regard. She notes the specific difficulties facing women in employment relations, and critically calls attention to the fact that international labor standards only benefit women if they are accompanied by national and global social policies that also recognize women's own responsibilities to care. Jensen (2014) conducted a study on the female live-in child domestic workers in Bangladesh. He showed that female child DWs in particular have a form of 'thin' agency whereby they are severely restricted in their abilities to make independent decisions or to act to their own benefit. Lai (2011) considers the case of contract MDWs in Hong Kong to explore the critical potential of diasporic identification in challenging hegemonic national discourses outside much-discussed European and American contexts. He argues the significance of attending to the simultaneous importance of forgetting in their own understanding and representation of their situation. From a study on the state and immigration regulations: shared experiences of foreign domestics in Singapore, Saudi Arabia, and Canada, Cheng (2014) found that tying live-in domestics to their employers for employment and immigration status makes women DWs vulnerable to potential abuse and exploitation. Visel

(2013) found that ILO's decent work practice as a global political response to the debate around transnational care and domestic work, and a progressive step forward in the international organizing of DWs. In addition, he argued that due to the specific mandate of the ILO in relation to labor and labor rights, the convention has left unattended questions of gender equality, unequal distribution of care work between the genders, migration regimes, and the situation of undocumented migrants. Islam & Cojocar (2016) showed the transnational variations and policy concerns of the MDWs in Asia. They found that there are considerable transnational variations of the MDWs in terms of their age and nature of work, legal identity, working hours, and remuneration across Asian countries. However, from the above discussion, we found clear evidence that there is a knowledge gap on the decent work practice among the MDWs. This paper attempts to unfold the features of two countries' decent work practice, one is Italy from Europe and another is Singapore from Asia

### **Methods and data**

The main objective of this study was to present comparative findings regarding the decent work practice (ILO Convention 89) in terms of working hours and annual leave, maternity protection, and minimum wage among the MDWs working in Singapore and Italy. The article is based on content analysis using existing available literature. We followed the type of papers similar to those of Joffres *et al.* (2008); Islam & Hossain (2014); Islam and Mungai (2015); Cojocar, Islam & Timofte (2015); Islam & Cojocar (2016). A content analysis is the systematic description of behaviour asking 'who', 'what', 'where', and 'how' questions within formulated systematic rules to limit the effects of analyst bias (Fraenkel & Wallen, 2008; Islam, 2013). The search for relevant literature was completed in two stages. First, we examined peer-reviewed articles found in electronic databases (Academic Search Premier, Academic Common, Aseline, Informit, Ingentaconnect, ScienceDirect, Scopus, Social Science Citation Index and SSRN, and PsycARTICLES) using keyword searches including nature and types of MDWs, causes of MDWs, MDWs in Singapore, and MDWs in Italy. Secondly, we used the 'snowball' method by searching for journal articles and reports, as well as articles presented in peer-reviewed conferences, cited in some of the articles that we had read. Altogether, the researchers had read 38 articles and discarded 13 (by 15 January 2016), the latter being opinion papers, conceptual articles, non-empirical descriptions of programme implementations, and literature reviews. Finally, we considered 25 articles and 10 reports, which we found more relevant for this study. We also reviewed relevant published and unpublished national and international reports and documents including reports published by ILO, IOM, Human Rights Watch, and Human rights organization in both

Singapore and Italy. Some of the significant articles and reports are listed in the reference section. Rather than simply summarizing findings of previous research, we critically analyzed the selected articles and documents.

## Results and discussion

The objective of the ILO's decent work practice is to allow some provisions so that the DWs and employers use the 'transnational space' to advance their demands, to bring their own needs and issues to the table, and ultimately achieve their rights towards their welfare (Visel, 2013). This is the only agenda that the DWs can improve their living and working conditions. The convention formulates a benchmark for decent working conditions for DWs, e.g. regulated hours of work, freedom of association, safety in the workplace, social security, maternity protection, and minimum wage coverage (Islam & Cojocar, 2016; Visel, 2013; Carls, 2012). A number of studies based on the ILO's decent work practice found a gap between the written rules and the real practices. However, the implementation of the ILO's decent work agenda involves inherent tensions and limitations, and the concept is contested (Bletsas and Charlesworth, 2013). Colombo (2007) showed that the image of a non-Italian woman, originally from an underdeveloped country, actually distorts a more complex and differentiated reality than an Italian DW. The table 1 provides comparative findings on the decent work practice among the DWs in two countries- Singapore and Italy.

Table 1. *Comparison of decent work practice between Singapore and Italy*

Areas of decent work practice	Singapore	Italy
<b><i>Working hours and annual leave</i></b>		
Normal weekly hours limit	44 hours	40 hours
Overtime limit	12 hours daily maximum (including overtime), 72 hours overtime per month	48 hours per week (including overtime) in average over a specified period, 250 hours per year
Maximum weekly hours limit	61 hours	48 hours
Minimum mandatory overtime premium/ time off in lieu of overtime wages	50% increase; no universal legislation on compensatory time off	10% increase; or compensatory time off, if provided collective agreements
Minimum annual leave (in working days, calculated for a five-day workweek)	7 days	20 days
<b><i>Maternity protection</i></b>		
Duration of maternity leave (as expressed in the national legislation)	16 weeks	5 months
Duration of maternity leave, converted into weeks	16 weeks	22 weeks
Amount of maternity leave benefits	100%	80%
Source of maternity leave benefits	Employer	Social insurance

**Minimum wage**

Minimum wage in national currency (31 December 2011)	No statutorily prescribed minimum wage	€1206 per month
Monthly minimum wage in US dollars (rounded)	-	\$1555 (metalworking sector)
Minimum wage-fixing mechanism	-	Collective bargaining
Minimum wage-fixing level	-	By sector and occupation
Excluded workers	-	Trainees

*Source: ILO (2013); adapted by authors.*

**Working hours and annual leave**

According to the working hours and annual leave, the MDWs in Italy are showing better decent work practice. In Italy, the normal weekly time is limited 40 hours (weekly 48 hours), where this is 44 hours (weekly 61 hours) in Singapore. The overtime limit in Italy is 48 hours per week (including overtime) in average over a specified period and 250 hours per year, which is 12 hours daily (including overtime), and 72 hours overtime per months in Singapore. The Italian MDWs can increase 10%; or compensatory time off, if provided collective agreements in minimum mandatory overtime premium/ time off in lieu of overtime wages which is 50% increase and there is no universal legislation on compensatory time off in Singapore. The MDWs in Singapore get only 7 days minimum annual leave (in working days, calculated for a five-day workweek), which is 20 days in Italy. There is no absurdity that a long working hours, are given no rest days, have limited food provision, and lack decent living accommodations. It is reported that some women are forbidden to leave the house (Cheng, 2014).

The above scenario is differently practiced in both countries. In the case of Italy, Scrinzi (2008) found that the average wage of declared live-in DWs is around €750 per month, for a 55-hour working week; the hourly wage of a DW is between €5.50 and €7. A live-in care assistant is paid €1,200 per month, including contributions. Scrinzi added that when the employee lives with her employers, her working hours often extend from day to night with no distinction, and include almost every day of the week. In certain cases, undocumented care assistants only leave the house when they go shopping for the family and are only paid between €500 and €800. Dal Lago and Quadrelli (2003) discovered that some DWs worked 16-hour per day for €600 a month. The Human Rights Watch (2013) reported that in Italy a renewed collective bargaining agreement between unions and employers' groups, signed in April 2013, provided an increased minimum wage for DWs applied progressively over three years and addressed gaps in the previous agreement. Improvements included paid leave for MDWs to pursue training opportunities and the right for live-in DWs to leave the house during their breaks. Castagnone et al., (2013) mentioned that all newly arrived immigrants in Italy are now requested to sign an agreement with the Italian authorities, committing themselves to acquire an adequate knowledge of the Italian language and of the

basic norms pertaining to social and civic life in Italy which is difficult for MDWS.

In the case of Singapore, Zweynert (2015) reported that according to decent work practice, the recruitment fees should not be charged to any worker. Despite this, charging and overcharging of recruitment fees is prevalent in Singapore. It's a practice that traps women with a lot of debt and makes them endure all sorts of abuses to eventually get their salary, from emotional to physical and sometimes even sexual abuse. The Human Rights Watch (2005) reported that the MDWs earn half the wages of Singaporean workers in similar occupations, such as cleaners or gardeners. The unpaid wages is a growing complaint. Many DWs are working without pay for months to settle debts to employment agencies, work long hours seven days a week, or are confined to their workplace.

The Asia Research Institute (2013) did not find any significant correlation between a worker's educational backgrounds, skills, and/or prior work experience (apart from having undertaken a previous employment contract in Singapore) with the DWs' monthly salary and employment terms. Rather they pay a high recruitment and placement fees (approximately S\$3,600), they have weak and unequal bargaining power and found discriminatory advertising practices by employment agencies such as those promoting workers with 'no days off', 'no hand-phones', or 'unlimited replacements'. The report found that the MDWs get monthly salary S\$450, although average figures ranged substantially between S\$170 and S\$750. Based on immigration regulations, foreign domestics are not allowed to work for another employer nor work in occupations other than domestic service. However, this does not prevent employers from requiring them to do work other than housework and childcare (Cheng, 2014). Many MDWs are involved in work during their day off or annual holidays which Bach (2014) mentioned as 'negative' income strategies and building up savings. The Human Rights Watch (2007) reported a case of Dita Wulansih, an Indonesian DW in Singapore in 2005:

*"I had to look after the baby, clean the house, and cook. I started work at 6 a.m. and went to bed at 1 a.m. If the baby woke up at night, I had to wake up too. During the day I had to stop my work to take care of her. I did everything. I got no sleep."*

## **Maternity protection**

We found a big discrepancy between two countries regarding the maternity protection of the MDWs. In Italy, they get 22 weeks (5 months) of the maternity leave (as expressed in the national legislation), which is 16 weeks in Singapore. They can claim the maternity leave benefits from the insurance (which is more secure and guaranteed) in Italy, whereas they have to depend it on their employer (which is not secured and guaranteed) in Singapore, though they can claim this benefit 100% which is 80% in Italy. The Thomson Reuters Foundation (2012) reported that the Italian Government and the relevant unions, and the Italian laws have provided more rights and protection to the DWs than the minimum standards set out by the Convention. Conversely, the foundation explained that DWs are ‘discriminated’ against in two areas as opposed to other workers such as maternity rights; and dismissal/contract termination. In the case of Singapore, according to the Work Pass Division of the Ministry of Manpower, MDWs must have a medical examination every six months includes a test for pregnancy, HIV, venereal disease, and tuberculosis in order to maintain their work permit. Failing any of these tests means immediate repatriation. The standard contract issued by the government includes a stipulation forbidding foreign domestics from getting pregnant. In other words, the structuring power of the state deepens the unequal power relationship in the household.

A fair collective bargaining is one of the power points for a fair maternity protection for a MDWs. Carls (2012) found out some difficulties to achieve any rights under this collective bargaining due to the high fragmentation and the low organizing degree on both the employers’ and workers’ side. In general, it has very low coverage rate of the concluded agreements, at least in those countries where they are binding only for members of the signing employer associations and trade unions. We would argue that due to a high percentage of informal employment, rights and protections, most often are only theoretical achievements, which are hard to reclaim in practice. They remain very far from the working realities of most DWs, characterized by high levels of exploitation, strong vulnerability and often also personal dependence. In this regard, Carls pointed out that this argument might sometimes be overstressed, with a possible negative effect of discouraging and legitimizing lacking control of labour rights even where it could be achieved without entering the private home. Carls further observed that all EU countries work permits are closely tied to one specific employer and employment contract. It is thus impossible for migrant workers to change their employer and/or sector in search for better working conditions, even in case they experienced harassment.

In the case of Singapore, the Human Rights Watch (2013) reported that hours of work, overtime pay, and maternity leave that fall short of protections enjoyed by other workers under Singapore's Employment Act. Carls (2012) found that the majority of DWs are dismissed from their work and there is no need for employers to comply with the possible reasons for dismissal as they are defined by Italian law. They are not obliged to procure a written dismissal statement, which is however a precondition for workers to obtain unemployment benefits. They are explicitly excluded from the respective law on dismissal protections, as households are not considered to be business undertakings. For the same reason, they are also barred from the legal norms on health and security at the workplace. However, the DWs are discriminated with regard to maternity protections and other care leaves, as well as benefits in case of sickness and work-related accidents. In the case of Italy, the DWs are covered by the obligatory and legally fixed 5 months of maternity leave (paid at 80% of the workers' monthly wage), they are excluded from all other related legal protections and rights. This means that there is no parental leave for DWs, no exemption from night shifts and no dismissal protection for mothers during the first year after the birth of a child, nor any of the additional paid care leaves foreseen for other workers. Moreover, the DWs receive much less paid sickness and accident leave than other workers, as no social contribution payments to the respective public insurance schemes are foreseen for them. The European Union Agency for Fundamental Rights (2011) reported that in Italy, the migrants had a work accident or a health problem, for instance a severe pain in the back or knee, or a skin problem, and were no longer able to work. The employers did not cover the cost of treatment and eventually dismissed the migrant. The FRA - European Union Agency for Fundamental Rights (2011) reported the voice of a MDW in Italy.

*“One day I started feeling a really bad pain at my back [...] it was sciatica [...] The doctor told me that I had to rest for a while [...] I told it to the lady and [...] she became really angry. She fired me.”*

A report published in 2005 by Human Rights Watch on Singapore gave some alarming statistics: “Between 1999 and 2005, at least 147 MDWs from workplace accidents or suicide, most by jumping or falling from residential buildings.” They are often pushed to the limit by bad working conditions, extremely long hours, anxiety over the debts they owe to the recruitment agencies, social isolation and the requirement to stay inside the home for long periods at a time, sometimes several weeks on end (ILO, 2007)



### ***Minimum wage***

The review evidence (table 1) shows that the MDWs have no statutorily prescribed minimum wage, no monthly wage, no minimum wage-fixing mechanism, no minimum wage-fixing level and nothing is mentioned in ‘excluded workers’ in Singapore. Where the MDWs in Italy has minimum wage (€1206 per month) which is equivalent of US\$1555, they fixed their minimum wage through collective bargaining, and their minimum wage-fixing level is determined by sector and occupation. However, the decent work practice, according to the Convention 89, is well evident in Italy. We found a number of studies which highlighted negatively about the decent work practice regarding minimum wage of the MDWs. This is much more vigilant in Singapore than in Italy. A number of studies such as Van Hooren (2010), Simoni and Zucca (2007), and Da Roit (2007) mentioned that the average wage earned by MDWS in Italy was €879 per month. Other studies have found that a live-in migrant care assistant costs between €700 and €900 (Da Roit, 2007). Cheng (2014) mentioned that the Government of Singapore has issued a standard contract for foreign domestics, which protects some basic rights but leaves unaddressed of some important issues such as working conditions and working hours. According to the existing rule the MDWs’ salary must be negotiated between employers and domestics. However, the MDWs are vulnerable to mistreatment (Yeoh, Huang and Devasahayam, 2004). It is fact that the MDWs lack negotiation power because of their inferior work status. The International Domestic Workers Federation (2015) reported that a MDWs earns S\$ 515 per month. Wage discrimination by nationally was found and the Burmese DWs are the worst paid compared to Filipinos and Indonesian. They work on average 13 hours a day. Only 40% had a weekly day off. 35% of the MDWs experienced some form of economic abuse, 6% physical and 7% sexual abuse by the employers.

The Asia Research Institute, Migration Out of Poverty and UK Aid (2013) jointly found a number of negative features, such as unregulated wage levels, undervaluation of paid domestic work, high recruitment and placement fees, workers’ weak and unequal bargaining power, and discriminatory advertising practices by employment agencies among the MDWs in Singapore which are against the decent work practice. Clarke (2013) surveyed 149 women MDWs in Singapore and found that 97% of the MDWs had excessive working days, 96% excessive working hours; 36% mentioned bad working conditions, 47% bad living conditions, 21% hazardous work, 99% low or no salary, and 60% no respect of contract signed. A majority of DWs are bounded by indenture and may spend as much as 10 months before being paid a salary in order to pay back their agency’s fee. Tan (2010) describes one DWs’ economical exploitation in Singapore

My employers would give me an allowance and deposit the rest of my money in my (joint) bank account. They said they wouldn't give me access to my own money as they were doing it for my own good, so that I would have savings. I would need to buy my own personal items out of my allowance. As with most employers they kept my passport and Work Permit so that I could not leave should I wish. Almost a year after I had started working there I developed an excruciating tooth ache. I couldn't talk or eat. A visit to the dentist resulted in the extraction of my wisdom teeth. The \$500 cost was deducted from my salary. After working for more than 1 year I begged and begged to be able to see my sister who was also working in Singapore. I was just so desperate to see her, to see anyone. I told them I needed to get some urgent family documents from her and they finally relented. I met my sister for 30mins at the MRT station close by. In 14 months those 30 minutes were the only time I interacted with anyone outside of the household and was the only time I was ever out of the house unaccompanied. Finally, after 14 months my male employer was to be relocated by his company. I cannot tell you the joy I felt. In order for my employers to allow me to transfer I needed to pay the transfer costs out of my own savings. I didn't care I was so happy to leave. In all the time I had been with them I had paid off a total of P87, 600 pesos debt (agency fees) I incurred by coming to Singapore. Further I paid my dental bill, bought my own personal items, paid the transfers fees, plus I incurred an additional month's debt from the agency for the transfer. I had worked 17 hours a day 7 days a week for 14 months for virtually nothing. I no longer had savings and I'd only sent a pittance home to my family. My dreams were well and truly shattered.

The Human Rights Watch (2007) reported that Singapore imposes a 150 percent penalty for convictions of physical or sexual abuse of DWs in acknowledgement of their position of vulnerability. They have begun to prosecute employers accused of abuse vigorously, and publicize these cases to send a message that abuse of DWs is not tolerated. The MDWs typically must forego the first six to ten months of their salary -out of two year contracts- to pay unregulated recruitment fees. The Human Rights Watch (2007) reported that the governments of Indonesia, Sri Lanka, and the Philippines together receive more than ten thousand complaints each year from MDWs abroad—unpaid wages, ranging from a few months to more than ten years, is the most common complaint.

## Conclusions

The Convention 189 marks a breakthrough in the realization of better working conditions in terms of the working hours and annual leave, maternity protection and minimum wages for the DWs. The fact is that after four years and seven months of its adoption (adopted in June 2011 and legalized in September 2013), only 22 countries (out of 186 as of 15 November 2015) have ratified this convention (as of February 2016). The long term goal of this Convention is to secure proper rights and benefits of the DWs. Based on the content analysis, this paper presented a comparative finding between one European country (Italy) and another Asian country (Singapore). It is clear from our review findings that the MDWs in

Singapore are working long hours, but getting lower opportunities in terms of their normal annual and maternity leaves, low wage and maternity protection than in Italy. The MDWs in Singapore have to work 4 more hours per week and 13 more hours in maximum weekly hours. Where they get only 7 days of the minimum annual leave which is 20 days in Italy. Their maternity leave is 6 weeks less than Italy.

We have analyzed a number of study findings that clearly swerved from the objectives and motivation of the ILO convention. Instead of the better statistical scenario in Italy, we found that there is no big difference of the real decent work practices between the countries which is ratified (Italy) and which is not (Singapore) of the ILO convention. We have presented a number of malpractices in both countries though we believe that this malpractices are more vigilant in Singapore. The major shortfalls in both countries included discrimination regarding the level of the rights and protection the DWs enjoy if we compare to both countries' general standards, especially where domestic work is regulated through specific legislation and/or collective bargaining instead of being simply covered by general labour law(s) (Carls, 2012). However, we have recorded that the MDWs' discriminations have been ranged from long working hours and economic deprivation to sexual abuse. In this context, we would say that the ILO's decent work practice has been commonly failed in both countries. Visel (2013) mentioned this as not having effective enforcement mechanisms and means of levying sanctions in cases of non-compliance. He argued that the initiative of the ILO can be nevertheless crucial instruments of mobilization and empowerment of the people that are concerned, as they help people to participate politically and strengthen their agency.

We found that the ILO published a number of its reports about the malpractices of this decent work in different countries including Italy and Singapore. We would argue that even only the general labour law(s) cannot give any guarantee and safeguard for a highly sensitive working sector such as domestic works. However, the risks and challenges would be remained unregulated in terms of working hours and leave, maternity protection, and minimum wage. We would believe that the formal discrimination will exist. Carls recommended to enforce the formal rights and protection, but we think that where the large majority of domestic work is carried out as informal work and most often by undocumented female MWs, the real working conditions are usually far from meeting the standards of decent work practice that would be hard to claim for such a highly precarious workforce. The ILO (2013) reported that a growing attention has been given to legislation that can improve the quality of jobs and working life. The policymakers have attempted to systematically compare national working conditions legislation in countries around the world for options. We would believe the urgent need is to raise awareness in order to change human attitude towards human dignity.

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