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Entangled Inequalities and Network Building

*Organizational Experiences of Paid Domestic Workers
in Uruguay and Paraguay*

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Abstract

This paper focuses on paid domestic workers' organizations and the networks they build with different types of actors within and across national borders. More specifically, my interest lies in analyzing how the entanglements of different axes, dimensions and scales of inequality that cut across this occupational field shape these networks. The research is based on two in-depth case studies that reconstruct the development of domestic workers' organizations and the introduction of their claims in the political agenda at a national level from 2005 onwards, which linked them to a broader transnational context. Analyzing data from interviews, participant observations, press articles and materials produced by the workers' organizations and their allies, the paper discusses how structural and contextual particularities shape the organizational experiences of domestic workers, as well as their outcomes.

Keywords

Paid domestic work; Inequalities; Social mobilization; Cross-organizational networking; Cross-border coalitions

Bio

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Paid domestic work and collective action: A difficult relation

Around 18 million people work in the domestic sector in Latin America, equaling 7 percent of the workforce of the region and 14.3 percent of the female workforce (ILO 2015:53). This makes domestic work one of the most – if not the most – important occupations for women in many Latin American countries. Yet despite its high incidence in the labor market, this occupational group has been historically discriminated against, both in law and in practice. In this respect, labor codes tend to mandate lower salaries and benefits for this sector, as well as longer working hours (Barbagelata 1978; Valiente 2016).

It was only within the past ten years that this occupational field has started to gain political attention and recognition worldwide. In this context, from 2006 onwards, eight Latin American countries¹ have adopted new laws in order to guarantee more rights for domestic workers.

So, why did it take so long for domestic workers to organize and fight for their rights? We can answer this question by taking a closer look at this occupational group and its characteristics. First, it is an almost purely female occupation – according to the International Labor Organization (ILO), at the regional level, about 93 percent are women – and one of the occupations that is most affected by labor informality and less valued in terms of income. In addition, in countries with a high immigration rate, there is a large number of migrant domestic workers; and where the population of indigenous people or afro-descendants is elevated, these tend to be overrepresented. This means that domestic workers are generally situated at the point where the most vulnerable ends of the axes gender, class and race/ethnicity converge. This leads to low socio-economic status and scarce political power. Domestic work is thus a paradigmatic case of confluence of different inequalities or *entangled inequalities*.²

Furthermore, the atypical conditions of this occupation make the already difficult organizational process even harder. Since paid domestic work is executed in the private household of others, it tends to confuse and complicate the divide between family and work, custom and contract, affection and duty (Gottfried 2013:117). In this line of thought, domestic workers are normally portrayed as ‘part of the family’, which enforces, perpetuates and aggravates the unequal relations of power between them and their employers.³ At the same time, this labor relation remains invisible to the public sphere, and consequently, it is particularly difficult for the state or other institutions in charge of mediating the relations between employers and employees to control working conditions.

All this makes it highly difficult for domestic workers to be seen and see themselves as subjects of labor rights, making organization a remarkably difficult task. In the same vein, to analyze domestic workers’ organizations, it is necessary to adopt a perspective that takes into consideration the singular position of this group in society.

This paper draws on two lines of research. On one hand, domestic workers’ organizations are analyzed from a perspective that stems from political sociology, employing literature on social movements and trade unionism. On the other hand, the analysis presents a structural approach which focuses on the position of domestic workers in the social structure.

¹ Uruguay in 2006, Costa Rica in 2009, Ecuador and Venezuela in 2012, Argentina in 2013, Chile in 2014, and Brazil and Paraguay in 2015. Bolivia and Peru reformed their laws some years earlier (in 2003).

² Braig et al. 2013; Costa 2011; Motta et al. 2018.

³ Anderson 2000; Blofield 2012; Hondagneu-Sotelo 2001; Parreñas 2015; Romero 2002; Young 1987.

By doing so, two different theoretical bodies are linked to interpret the cases. While both can be found in literature about domestic work, they have not been applied in a coordinated way. In this sense, intersectional analysis – i.e., the approach that considers the interactions of gender, class and race/ethnicity regimes – is common in studies about paid domestic work. But when applied, it is normally to describe the *personal* experiences of domestic workers, as well as to reflect on *identity processes* (for a paradigmatic study, see García Castro 1993). At the same time, when the organizational experience is the main interest, the preferred approach is generally of a political nature. Although the debate on collective action is broad and covers issues such as political opportunities, resources, strategies, collective identity, framing, and/or the role of emotions in mobilization processes (Smith and Fetner 2010; Walder 2009), the influence of the social structure on these phenomena is often overlooked.

It is precisely because of this gap in the literature that this project seeks to create a link between both approaches, focusing on the interrelation between the structure of inequalities and mobilization. Thus, different perspectives are combined, building a bridge between political sociology and structural analysis, opening a space for questions about the interaction between actors' decisions and capacity of action, and structural factors that have a bearing on their agency.

Domestic work and entangled inequalities

This study focuses on organizational experiences of domestic workers, a group that assumes a subordinate position in society. In line with this, the analysis is carried out from the *entangled inequalities*' perspective.⁴ This approach understands social inequalities as multidimensional asymmetries (economic, cultural and power-political), that derive from different power regimes (class, gender and race/ethnicity, among others) and that interact with different spatial (local, national, global) and temporal (historical) scales.

Analyzing domestic work from this perspective allows us to see how class, gender and ethnicity discrimination is crystallized within this group. As a detailed analysis of domestic work shows, this occupation has historically been considered women's work and, consequently, 'reproductive' (and thus, non-productive) labor. In this context, its participation in the production of value has been concealed (Dalla Costa and James 1975; Federici 2010), and at the same time, the work carried out in the 'public sphere of the market' is seen as something totally detached from the reproduction of life. Men's and women's work are presented as parallel worlds, hiding the relation between capitalist production and *care*, and granting value to one – which deserves a wage – while denying it to the other.

Furthermore, this link between gender and domestic work has proven to be strong and persistent. Several studies⁵ show that even when both members of a couple work outside from their home and a third person is hired for doing the housework, the woman is still the one in charge of organizing and supervising everything related with it. At the same time, the person hired is almost always another woman. The gender specificity of domestic work remains, but

⁴ Costa 2011; Braig et al. 2013; Motta et al. 2018.

⁵ Gutiérrez-Rodríguez 2010; Hondagneu-Sotelo 2001; Rollins 1985.

new social divides are introduced. Thus, class inequalities, and very often, racial/ethnic and citizenship divides are incorporated within the household.⁶

The intersection of these axes of inequality and the interplay among them affect the position domestic workers assume in society. While the economical dimension is the most obvious – domestic work is one of the worst paid activities, regionally and globally – this is also linked to cultural and political inequalities. In this sense, all dimensions are interrelated and affect each other in a reciprocal way. In Gutiérrez-Rodríguez' (2010:15) words:

...the correlation between the societal recognition of domestic work and its labor force, commonly racialized and feminized, reveals how labor is not only constituted by its quality, but by its quantifiable character in terms of who does the work. Domestic work is not only badly paid because it is signified as non-productive, but because those doing this work are feminized and racialized subjects considered as "inferior" to the hegemonic normative subject. Again, the devaluation of domestic work is culturally predicated and reflects a hegemonic perception.

Approaching domestic work from a perspective on entangled inequalities also makes visible the relations around domestic work on a broader international context, in which less economically developed regions, such as Latin America, provide this labor force to more developed regions, such as Europe or the United States. Furthermore, this approach combines a synchronic with a diachronic perspective, focusing on present forms of inequality but without overlooking its historicity, highlighting the way in which current inequalities are related to past ones. This level of analysis is particularly useful for domestic work, an occupation that has historically drawn people from groups considered inferior by those in power.⁷

As a result, despite the centrality of domestic work for the reproduction of life and its huge incidence in the labor market, this group has not had enough strength to make their claims heard, at least not until the last decade.

Notwithstanding the difficulties, domestic workers organize, and not in isolation. Quite the opposite, they build networks with other actors to increase their strength and chances of achieving their goals.

Building networks of labor activism

As Brites (2013) points out, studies about domestic workers' organizations stress a contradictory situation: on the one hand, they highlight how difficult it is for them to organize and how diminutive these organizations are in relation to the size of the population involved in the domestic sector; on the other hand, they call attention to how much they have achieved despite their few members and lack of experience in labor related negotiations. The key to their success seems to lie in the construction of networks and transnational coalitions (Boris and Fish 2015; Goldsmith 2010, 2013).

Because of the characteristics of domestic workers – i.e. their position in the social structure mediated by different axes of inequality – labor, feminist, and ethnic-based or migrants'

⁶ Anderson 2000; Gutiérrez-Rodríguez 2010; Hochschild 2000; Hondagneu-Sotelo 2001; Lan 2006; Rollins 1985.

⁷ Cumes Simón 2014; Durin 2014a, 2014b; Gill 1994; Glenn 1992; Haskins and Lowrie 2015; Higman 2015; Kuznesof 1993; Van Nederveen Meerkerk 2015.

organizations are potential allies of the sector (Blofield 2012:60). But attention from these groups does not come naturally. Moreover, because of the crystallization of different regimes of inequalities within this occupation, organizations advocating for labor, women's or migrants' rights do not tend to regard the situation of domestic workers as their priority. On the contrary, these organizations generally give more importance to the needs of more advantaged members within them (Strolovitch 2007, 2006). This means that trade unions tend to prioritize the interest of male workers or people working in the formal sector; and that in women's organizations the view of the better-off tends to prevail.

The way alliances and coalitions are built depends on the local context. But not only the domestic or local particularities are important: the transnational background also exerts its influence "help[ing] reframe international and domestic debates, changing their terms, their sites, and the configuration of participants [...] enhanc[ing] the political resources available to domestic actors" (Keck and Sikkink 1998:x). For example, even though legal reforms are a clear nation-based process (considering that they are discussed and voted within national borders, in each country's parliament), it is easy to see the transnational connection of the wave of changes that took place in Latin America from 2006 onwards. In this respect, the discussion and later adoption of the ILO Convention No. 189, concerning decent work for domestic workers, not only represented a milestone for the sector, but also gave a strong impetus to many of their organizations, providing a 'legitimized' discourse and helping them to gain recognition at the national level.

As we will see below, the networks that domestic workers build – and within which they act – have two distinct but related characteristics. On the one hand, they involve *cross-border strategizing*, having activists from different places working together. On the other hand, they involve *cross-organizational networking* that brings together different types of actors, such as local and global trade unions, Non-governmental organizations (NGOs), self-organized workers groups, or social movements. This type of network is defined as Networks of Labor Activism (NOLAs), a term introduced by Zajak, Engels-Zandén, and Piper (2017) to refer to a particular type of activist networks that "are neither solely connected to the position of labour in production processes, nor wholly reliant on the soft and discursive power of advocacy coalitions" (ibid.:899).

Whilst addressing labor-based struggles, the NOLAs concept also gives room for other ways of organizing, different from 'traditional' trade unions – i.e., unions of male, formal and industrial workers. Thus, it includes other types of organizations – such as NGOs – that have supported the claims of women workers in the informal economy for decades (Kabeer 2015). By doing so, it considers the action of organizations *of* domestic workers (i.e. their own associations and trade unions), organizations working *with* domestic workers (e.g. local NGOs), and organizations that make claims *on behalf* of domestic workers (e.g. multilateral organizations). Rather than analyzing them separately, the aim is to focus on their joint work, their interactions and their relationship to each other.

But this approach also poses some challenges for the analysis of domestic workers' organizations. In this respect, the concept of NOLAs was introduced in a context of global value chains, in which the participation of actors operating internationally is self-evident. In the case of domestic workers, a group working within and for the domestic market, and without international connections *a priori*, the transnational nature of the organization does not occur

automatically. Furthermore, unlike people working for big transnational corporations, who are physically concentrated in particular locations and have clearly identifiable employers, domestic workers are dispersed in private households and work under extremely heterogeneous conditions. This naturally has a repercussion on the way the networks are built.

In fact, Zajak and her colleagues stress that the structure of the network of labor activism is affected by the characteristics of the workers they are trying to defend. It is here that the bridge between both perspectives – entangled inequalities and networks of labor activism – can be seen. Thus, the main argument of this paper is that the position of domestic workers in the social structure, considering the entangled inequalities that affect them, will have an impact on the actors with whom they relate and the type of relationship they build, as well as on the way their claims are presented and framed.

Drawing on the cases of Uruguay and Paraguay – the two smallest countries in the Southern Cone Region of Latin American in terms of territorial extension, population and economy – this paper intends to show how contextual and structural particularities have an impact on the way domestic workers organize and the results they can achieve.

In the Vanguard: The Uruguayan Experience

Despite earlier organizational experiences of domestic workers in Uruguay, by the end of the 1990s, these groups were no longer active. It was only in 2005 and in relation to the victory of the *Frente Amplio* (left-oriented coalition) that they started to organize again. In this context, the gender department of the PIT-CNT,⁸ the Uruguayan national trade confederation, made a call to all domestic workers to reactivate the SUTD,⁹ the historical domestic workers' trade union.

The government of the Frente Amplio played an important role in this. Already in his inaugural speech, the newly elected President Tabaré Vázquez stated that they were planning to change the law in order to guarantee more rights to domestic workers (Mazzuchi 2009:46), and that they would introduce a bargaining procedure for this sector to set wages and other benefits, known in Uruguay as *Consejos de Salarios* (wage councils).

Before the end of 2005 the (new) SUTD was active, and by 2006, Uruguay already approved a law for domestic workers, guaranteeing them the same rights as any other worker. But fulfilling the governmental promise of the bargaining procedure proved to be more complicated. As we know, a tripartite negotiation needs the participation of the state, workers' and employers' representatives. And to find an actor that could represent all households that hire a domestic worker was not an easy task. After some failed negotiation with a couple of employers' organizations, the responsibility was finally assumed by the *Liga de Amas de Casa del Uruguay* (LAC-Uy), the Uruguayan Housewives' Organization. Finally, in August 2008, the tripartite bargaining council met for the first time, and by the end of the year, they had already signed their first agreement.

To achieve this, the SUTD worked closely with the PIT-CNT. The identification with the trade union confederation is strong. In the words of one of their representatives:

⁸ Acronym for *Plenario Intersindical de Trabajadores – Convención Nacional de Trabajadores* (Inter Trade Union Plenary – National Workers' Convention).

⁹ Acronym for *Sindicato Único de Trabajadoras Domésticas* (Sole Domestic Workers' Union).

When we go out, both abroad and here within our country, when we say we are SUTD, we are also SUTD PIT-CNT. We have a first name and a last name. And that last name has a lot of value for us.¹⁰

The *Universidad de la República*, the main National University in Uruguay, also played a vital role. Joint projects from the School of Law provided legal advice to the SUTD and the Housewives' Organization respectively. Other schools like Social Work and Psychology also implemented projects with the SUTD, helping them to organize (see Brenes et al. 2012).

But, surprisingly, also the Housewives' Organization (LAC-Uy) was fundamental for domestic workers to gain more rights. Although some actors attribute the great success of domestic workers to the lack of housewives' experience in collective bargaining, it was the capacity of the LAC-Uy to see their own claims reflected in the claims of domestic workers which helped the SUTD to achieve such good results. In the words of a representative of LAC-Uy:

*...the labor performed within the household, **whether paid or unpaid**, has a special value; it is something that should be recognized, valued [...] We always say that the labor performed by domestic workers deserves to be positioned in the best possible way, and that it deserves to be considered a job like any other.*

In the struggle for the recognition of paid domestic work as work, i.e. as deserving of labor rights, the LAC-Uy saw a first step that could help them achieve their own main objective as well, namely, the recognition of the work of housewives as work, worthy of rights such as social security or retirement. They see both positions as part of the same struggle, a struggle of women whose work is invisible and that do not receive the respect and appreciation they deserve. In this line of thought, representatives of the LAC-Uy and of the SUTD point out that the relationship between these organizations, which should be 'by nature' conflicting, is always held with respect and collaboration, even when they defend contradictory positions at the negotiation table.

Although the SUTD sees itself as the only trade union for domestic workers, there exist and existed other organizations dedicated to fight for rights for the sector. The role of the feminist NGO *Cotidiano Mujer* is worth mentioning in this context. This organization has been working on the issue from 2006 onwards, and has tried to maintain a different focus than the union's in order not to collide with their work. Thus, *Cotidiano Mujer* became involved in projects addressed to migrant domestic workers that do not have the time to participate in the trade union's activities. For instance, workers that live in the household they work for – which is the case of most migrant workers – are free only on Sundays, and trade union's meetings were held on Fridays.¹¹ The SUTD and *Cotidiano Mujer* worked together in joint activities, especially within the first years (2005-2010). But with time, the tension between them grew bigger and bigger, until they eventually parted ways. A representative of *Cotidiano Mujer* explains what happened:

We were working mainly with migrant workers that were not part of the trade union because we understand that the union is the responsible institution... Despite this some

¹⁰ All interviews conducted in Spanish by the author, between October and December 2016, in Montevideo, Uruguay and Asunción, Paraguay respectively.

¹¹ The SUTD tried to be receptive to this criticism. By 2016, they were also holding meetings on Thursday evenings, and by 2018, also on Tuesdays. In spite of this, the fact that they do not offer services on Sundays is still an impediment for many live-in domestic workers.

*conflicts arose because some union members considered that this issue somehow **belonged** to them.*

In 2011, internal problems within the SUTD produced a cleavage that resulted in the division of the organization. The fraction that left the union decided to work directly with Cotidiano Mujer, but after a couple of years, they suffered another rupture. Some of the workers that were part of this group decided to start a parallel trade union. The main claim of this new group, which calls itself *Trabajadoras domésticas sin fronteras* (Domestic workers without borders), is that the SUTD does not consider the situation of migrant domestic workers.¹² Nevertheless, the SUTD is still the main organization of the sector and the other trade union has only a marginal presence in the country. This is also related to the labor movement's history in Uruguay, where the existence of a unified confederation – the PIT-CNT – is its main feature and pride.

Regarding multilateral organizations, the ILO, UN Women and international NGOs funded some projects which targeted domestic workers in Uruguay. These were executed through Cotidiano Mujer and the Cuesta Duarte Institute, PIT-CNT's research center. However, the SUTD has remained mostly an independent structure. They still rely on the PIT-CNT and other organizations for funding some trips, but they also have their own funds, originating from their members' monthly payments.

The unfinished Paraguayan struggle for equal rights

Paraguay had a domestic workers' trade union in the 1980s, but its role was minimal, and it finally stopped working in the 2000s. In this decade, the first organization of domestic workers that emerged was an association – the ADESP, Spanish acronym for Association of Domestic Workers of Paraguay. Its start is tightly bound to a feminist NGO, the CDE,¹³ which in turn got involved in this issue through ILO-funded projects.

Around 2008, the CDE was working on a research project entitled “The life of Domestic workers” and decided to conduct focus groups. This is how many domestic workers from impoverished areas around Asunción, the capital city, came in contact with each other, and started to see that their problems were similar. They decided to create the ADESP, which by 2009 was working as a legally constituted association. It is noteworthy that they organized as an association and not as a trade union, even if their main objective was gaining more labor rights for the sector. When asked about this decision, one of the representatives told me that they did so because they were not familiar with trade unions, and because they did not know that a domestic workers' trade union existed in the past.¹⁴

This appeared to be the necessary impulse that the SINTRADOP, the historic domestic workers' union, needed to re-organize. This union, which at that time was a member of the CNT, one of the many trade union confederations in the country,¹⁵ started to work again in 2009. A couple of years later, another big national trade union confederation, the CUT-A, also decided to work on

¹² In Uruguay, most domestic workers are Uruguayan. According to official data, less than 2 percent of them are international migrants (González Quinteros and Cancela 2014:38).

¹³ Acronym for Centro de Documentación y Estudios (Documentation and Studies Centre).

¹⁴ On 8 July 2018, around 10 years after it was founded, the ADESP became an official trade union, SINTRADESPY, Spanish acronym for Paraguay's Domestic Workers' Trade Union.

¹⁵ Unlike Uruguay, the labor movement is extremely fragmented and debilitated in Paraguay. For a country with a working population of around 4.2 million people, from which only 270,000 are union members (6.5 percent), there are nine national trade union confederations.

the domestic workers' issue, and it started to organize workers from the south of the country through an ILO-funded project. This is how the third organization in Paraguay, SINTRADI, emerged in 2012.

Although having support from different organizations could be seen as something positive, it can also lead to tensions and conflicts. In this respect, in my interviews in Paraguay I heard expressions such as “the best way of demanding labor rights is through trade unions and not through NGOs”, or “in this country NGOs are replacing trade unions and stealing prominence and funding from them”. From a different perspective, other actors told me “this issue was never a priority on the agenda of trade union confederations”, and that “domestic workers don't want to be swallowed by the trade union confederations' structure; they want to have their own voice”.

Despite the conflictive situation between the main allies, all three domestic workers' organizations – ADESP, SINTRADOP and SINTRADI – worked together since the beginning of this process. They organized joint demonstrations, public hearings, and worked together on the draft of the domestic workers' law, which was approved in 2015. This law introduced new rights and better conditions for the sector – such as an eight hour-workday, social security, maternity leave and paid holidays – but domestic workers still suffer from legal discrimination: the minimum wage for the sector is only 60 percent of the minimum wage for other activities.

Unlike the Uruguayan case, an actor that publicly opposed the new law was the Paraguayan Housewives' Organization (LAC-Py). Their main objection was to the increase in the minimum wage for domestic workers (which went from 40 percent of the legal minimum wage to 60 percent). When asked about the reason for opposing to this, a representative of the LAC-Py told me that since most domestic workers lack previous working experience, it would be unfair to pay a minimum wage to those “that know absolutely nothing”.

Although the aim of the LAC-Py is the same as that of the homonym group in Uruguay – getting retirement rights for housewives – they do not see the demands of domestic workers as an integral part of their own struggle. Furthermore, pointing out cultural and linguistic differences between housewives and domestic workers,¹⁶ the interviewee defined both groups as belonging to “different universes”, and thus, deserving different treatment.

Nevertheless, the approval of the new law was regarded as a huge victory for the sector, considering that bad working conditions of paid domestic workers were seen as something ‘natural’ in Paraguay (González and Soto 2009:142; Soto and Ruiz Díaz Medina 2014:26). The support of nation-based actors – such as the CDE, some governmental branches, human rights organizations and union confederations – was essential. But probably even more important was the backing of multilateral institutions such as the ILO and UN Women.

As already mentioned, the mobilization of domestic workers in Paraguay started after the CDE decided to conduct research on this subject. The first projects – and many more that came later – were funded by the ILO and UN Women. This funding supported not only research projects and

¹⁶ In Paraguay, most domestic workers come from peasant families, having a background of rural-urban migration (Heikel 2014:54ff; Soto 2014:15-16). Their cultural identity differs from the one that predominates in the capital, being their more obvious difference their mother tongue, the Guaraní language (in urban centers, Spanish is the most spoken language).

publications, but also helped domestic workers organize, providing them with material resources for their demonstrations, for attending meetings, and for attending courses to learn how to confront their opponents.

The impulse and support of the transnational allies was not only material, but also symbolic. Unlike Uruguay, in Paraguay the discussion about changing the law to guarantee more rights for the sector was only taken seriously after the ILO Convention 189, concerning decent work for domestic workers, was adopted in 2011. The recognition of domestic work as work, and as such, entitled to rights just as any other occupation, set a milestone for domestic workers, locally and globally. The fact that this document was approved by a renowned institution, made up of representatives from governments, workers and employers, helped to legitimize their claims and opened new opportunities in the domestic sphere.

Contrasting the cases: The interaction of different contexts and actors

The examples of Uruguay and Paraguay show how the local context, the strength of local actors and their relation to transnational institutions, as well as their perception of differences, all affect the way domestic workers organize and claim their rights. We can point out contrasts at different levels, namely:

Alliance-building and relation to different actors

As mentioned before, labor, feminist and migrants' organizations are regarded as 'natural' allies of domestic workers. But the attention of these groups does not come naturally, and it is highly dependent on the national context. In the case of Uruguay, the country with the strongest labor movement in the Americas (with a union density of 30 percent, according to ILOSTAT¹⁷), it is not surprising that domestic workers decided to organize within the national trade union confederation. In contrast, domestic workers of Paraguay have found their biggest ally in a feminist NGO, mainly because of the state of extreme weakness and high fragmentation of the labor movement in the country. Nevertheless, both labor-based and feminist organizations support domestic workers – to a different extent – in Paraguay and Uruguay.

What is remarkable is that in both cases, the resulting situation is complicated, hindering the building of synergies among the different allies. Tensions and conflicts about to whom this topic 'belongs' are not rare.

Organizational model

The first Paraguayan organization emerged as an association and not as a trade union. This is linked, again, to the labor situation in the country, in which unions are not only weak, but also delegitimized and discredited. In this sense, the decision to stay an association for years could have been strategical, aiming to generate broader support. But it also implied some problems, like the difficulty in applying for funding meant for trade unions, especially those executed through union confederations.

Claims and framing

¹⁷ Data from 2013. See <https://www.ilo.org/ilostat>

Most of the claims are labor related, such as better wages and better working conditions. The way these are framed, however, differ. While in Uruguay the claims are directly linked to labor issues, in Paraguay they are normally presented as demands of *women*. Nevertheless, more ‘feminist’ demands (such as questioning the unequal division of care work within the families) are not directly addressed in either of the cases.

Strategies and outcomes

The differences in the time elapsed for domestic workers to have a new and equalitarian law, in Uruguay and Paraguay, is worth mentioning. Whereas in Uruguay only about a year went by between the constitution of the SUTD and the new law; in Paraguay the process spanned over 6 years, and the results were less positive. In the same vein, the amount of demonstrations and public events staged by domestic workers was much bigger in Paraguay. This is related to the lack of institutionalized mechanisms, such as the bargaining councils active in Uruguay.

Legitimation of demands and broad-based support

The legitimation of demands is closely linked to the way the different axes of inequality are perceived in the specific context. How and whether ethnicity is addressed seems to have an important impact on the success of the organizations. In that regard, the more ‘racialized’ Paraguayan context makes more difficult the identification of broader sectors of society (like housewives’ organizations) with the claim of domestic workers.

Interrelation with the transnational context

The cases also show different models of interaction with transnational norms and institutions. When the Convention 189 was discussed and later adopted by the ILO, Uruguay had already gone through a broad legal reform and had negotiated two collective bargaining agreements with the domestic workers’ union. In Paraguay, on the other hand, the adoption of the Convention 189 – together with projects funded by multilateral institutions such as the ILO and UN Women – was the starting point of the legal reform process that is ongoing to the present day.

Concluding remarks

Different axes of inequality cut across domestic workers, affecting their position in society. As a group with scarce economic and political power, they face different obstacles to organize, and they must seek allies to be able to gain legal reforms. By organizing with different types of actors, within and across borders, they build networks of labor activism.

While both selected countries share many geographical and population features, the way domestic workers organized and the results they achieved differ considerably. In this sense, the Uruguayan experience relied much more strongly on the labor movement, while Paraguayan domestic workers found their strongest ally in a feminist organization. In both cases, conflicts and tensions between these two actors are not rare.

This also affected the organizational experience at other levels. For instance, the way the claims for more rights are presented, and the narrative used to mobilize supporters and sympathizers differ. The reference to *labor* solidarities is much stronger in the Uruguayan case, while in

Paraguay, *gender* issues tend to be predominant. In this line, the decision regarding the organizational model reflects the level of proximity of one or another ally.

Gaining support of different groups of society proved to be difficult in more racialized contexts. In this regard, the perception of ethnic (or cultural) divides in Paraguay acted as a barrier for obtaining support from the housewives' organization. In relation to this, the backing of multilateral institutions was also more relevant in the Paraguayan case, where activists had to rely on the 'legitimizing figure' of the ILO and its Conventions much more often.

The possibility of institutionalizing legal changes – thanks to strong governmental support and a historical bargaining tradition – translated into a lower level of conflict and disruptive action in Uruguay. In Paraguay, where the opposition to legal reforms was and still is higher, domestic workers and their allies had to take to the streets many times.

By analyzing the experiences of organized domestic workers in Uruguay and Paraguay, two closely related but contrasting cases, this paper sought to contribute to a better understanding of how different axes, dimensions and scales of inequality shape the organizations of this occupational group, and consequently have a bearing on their relations to other actors, their style of acting, and to a certain extent, their outcomes.

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