"We are workers, we are not slaves"

The importance of grassroots discourses on decent work for migrant domestic workers

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We argue that grassroots participation in multilateral negotiations over norm-setting is important because grassroots discourses differ from those of multilateral organizations. To compare the two, we use sociolinguistic theories that link embodied experience, ideology and discourse. We analyze texts about domestic work from the International Labour Organization (ILO) and a grassroots organization of migrant domestic workers in Hong Kong, the Asian Migrants Coordinating Body (AMCB). Findings show that AMCB's commitment to grassroots migrants, and the embodied experiences of its members and leaders, enables their discourses on "decent work for domestic workers" to be more intersectional, more substantive and more critical than the discourses of the ILO. This case illustrates that even when the overarching norms appear to be the 'same', the discourses of grassroots and multilateral organizations still offer fundamentally different images of what constitutes "decent work" and what is required to achieve it.

Keywords: international norms, grassroots organizations, migrant workers, domestic work, discourse

1. Introduction

There is widespread acknowledgement within multilateral organizations that it is important to engage and include those working towards human rights at the grassroots level (Edwards and Gaventa 2014; Fox and Brown 1998). Scholars, in turn, have analyzed case studies to understand the relative (in)effectiveness of programs aimed at increasing grassroots participation (Campbell and Mzaidume 2001; Romano 2019), and to examine the tensions that emerge between ideologies of multilateral institutions and those of grassroots stakeholders (Gibbings 2011;

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Batliwala 2002). While useful in investigating the challenges to meaningful participation, such work overlooks a more basic question about why the participation of grassroots stakeholders is a meaningful form of political communication to begin with. In this paper we offer a partial answer by arguing that one reason grassroots participation is important is because grassroots discourses differ from the normative discourses of multilateral organizations in that they offer insights that emerge from lived experience. More specifically, focusing on the issue of rights for domestic workers, we illustrate how grassroots organizations of migrant domestic workers put forward normative discourses on "decent work" that differ from what is expressed by the International Labour Organization (ILO).

We examine these discourses as they appear in texts, comparing the ILO's 2011 Convention on Domestic Work and other related documents with statements and related documents of a grassroots alliance of migrant domestic workers in Hong Kong — the Asian Migrants Coordinating Body (AMCB). Our findings show that although there is overlap, the AMCB's discourses on decent work are more intersectional, substantive and critical than the discourses of the ILO. To be more precise, while both organizations describe rights violations faced by domestic workers, the AMCB more often describes decent work in relation to a *substantive notion of equality* that can account for intersecting forms of oppression, whereas the ILO describes decent work in relation to a more narrow view of *equality as consistency* (Fredman 2016). Moreover, while both organizations emphasize the responsibility of governments in addressing these rights violations, the AMCB criticizes government stakeholders, whereas the ILO uses more diplomatic discourses to downplay criticism toward any particular stakeholder, obscuring responsibility. We discuss how these differences are informed by the differing goals, social locations, and embodied experiences represented by the two organizations. Overall, in focusing on this particular case, we argue that even where there is a history of cooperation and general agreement between the multilateral and grassroots organizations, the identifiable differences in their discourses point to different normative understandings of "decent work". In doing so, we also contribute to discourse-based scholarship that has highlighted the problems and limitations of normative discourses emerging from multilateral organizations (Matejak 2024; Bélanger-Vincent 2024). Our critical intervention is to foreground the potential that grassroots discourses have to fill in the epistemological and ethical gaps posed by these multilateral discourses.

2. International norms and domestic work

2.1 The discursive construction and diffusion of norms

The spread of international norms (Gilardi 2012) was initially studied from a top-down approach that emphasized the spread of 'good', 'universal' and 'international' norms across states in a rather static and predetermined way (e.g. Nadelmann 1990). However, later scholarship argued for a more dynamic understanding of how domestic actors agentively negotiate these 'international' norms in relation to their own social and political locations, which correspond to 'local normative orders' (Acharya 2004, 244; Baltag and Burmester 2022). Acharya (2004), for instance, proposes the notion of 'localization' as a way to understand how global norms are reconstituted through the actions of domestic actors. Dunford (2017) argues, however, that scholarship on localization still overlooks the agency of the grassroots, because it focuses on elite actors and continues to inaccurately associate Western norms with global norms and Southern norms with local norms.

These debates foreground the politics of knowledge production, wherein knowledge emerging from specific sectors is unequally valued or may not even count as 'knowledge'. Scholars have shown that the politics of knowledge production operate more broadly within multilateral settings, which at times valorize and at other times dismiss local knowledge (Cummings, Regeer, de Haan, Zweekhorst, Bunders 2018; Gibbings 2011). This has led some to argue for a move towards norm setting that valorizes grassroots knowledge on its own terms, rather than only in relation to what it gains from or produces for the establishment of 'global' norms. Along these lines, Ackerly calls for the establishment of human rights norms that value knowledge coming from grassroots activists' lived experience, and that situate norms within 'contextually specific human rights activism and social criticism' (2008, 22).

Within discourse studies, these discussions about the diffusion of norms can also be conceptualized in terms of *discursive changes* that take place more globally, as well as the more localized *discursive shifts* that reappropriate and contribute to these changes (Krzyżanowski 2018; see also Fairclough 1992). Such a framing, draws from an approach that understands discourses about political issues as arguments about how the world works — or how it should work (Hastings 1999; Balabanova and Balch 2020). This in turn, reflects and builds on an understanding of language as not only conveying information, but also performing social actions (Austin 1975) that can impact society in a number of ways (Fairclough 2003).

Within the discourse analysis tradition it also understood that the social context and the social location of speakers shapes discourse. Thus, the discourse of powerful institutions will differ from the discourses of those resisting powerful ideologies and policies — in terms of content, form and impact (Foucault 1984; Bourdieu 1991; Hughes 2018; Lee and Makoni 2022). Further, we posit that whether one has learned about an issue through first-hand experience vs. second hand discursive information has the potential to shape the resulting discourse in important ways. This idea builds on scholarly work that considers how embodied experiences of emotion, (dis)ability, and sickness impact the resulting discourses of speakers (Poynton and Lee 2011; Canagarajah 2023; Karimzad and Catedral 2022). Particularly important for us is the notion that speakers with first-hand experience have a more detailed, embodied "image" from which to draw in constructing their discursive understanding of the issue at hand (Karimzad and Catedral 2022). We show below how the AMCB being led and made up of MDWs gives them access to first-hand experiences of domestic work, which makes them better situated than the ILO to discursively imagine the details of what it is like to be a MDW.

2.2 Beyond norm diffusion: Multi-scalar advocacy for domestic workers

In 2011, the Domestic Workers Convention (C189) — a treaty that recognizes domestic workers' right to decent work — was adopted. A "landmark treaty",[1] the convention was lauded by civil society because of the focus on the lived experiences of domestic workers. This was a result of both the involvement of the International Domestic Workers Network (IDWN) and the space that other grassroots domestic worker organizations had to observe and lobby those who could speak during official sessions (Pape 2016; Fish and Shumpert 2017). Since 2011, the norms codified in this convention have been diffused through the ratification of the convention by 40 member states, and the work of various NGOs and grassroots organizations who use the C189 to bolster their own campaigns for decent work for domestic workers (Fish and Shumpert 2017; Rother 2022).[2]

In Hong Kong, the grassroots alliance of AMCB focuses most of its campaigns on issues of decent work for *migrant domestic workers* (MDWs), who are referred

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1. ILO,(2013, Sep 5). ILO's Landmark Treaty for Domestic Workers Comes Into Force. *International Labour Organization News*, https://www.ilo.org/global/standards/information-resources-and-publications/news/WCMS_220793/lang--en/index.htm.

2. ILO, (2013, Sep 5). Ratifications of C189 — Domestic Workers Convention, 2011 (No. 189), International Labour Organization Normlex, https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:11300:0::NO::P11300_INSTRUMENT_ID:2551460.

to by the Hong Kong government as *foreign domestic helpers* (FDHs). According to the Immigration Department there were 367971 FDHs working in Hong Kong as of the end of 2024, with most of these migrants coming from the Philippines and Indonesia.[3] These workers come on a restrictive visa to work and live in the private homes of their employers in Hong Kong, where they often suffer various forms of social exclusion and exploitation (Mission for Migrant Workers 2021; Ladegaard 2016). An important part of the long-term migrant organizing in Hong Kong, AMCB is a coalition of grassroots organizations of migrant workers of different nationalities, mostly from South and Southeast Asia (Constable 2009; Hsia 2009; Rodriguez 2013). In addition to the "scripts of servitude" that these workers are socialized into throughout their labor migration trajectories (Lorente 2018), this alliance and its member organizations, use their experiences as MDWs as a starting point for constructing scripts of resistance to this servitude. Established in 1996, 15 years before the adoption of C189, AMCB and its member organizations were among those who lobbied government representatives, and national and international unions during the 100th ILC where the C189 was eventually adopted.

There are, however, a number of crucial differences between the ILO and the AMCB that lead to the construction of differing norms on decent work for domestic workers. As a special agency of the UN, the ILO takes on the UN's characteristics of presenting itself in a depoliticized way in order to claim its legitimacy, despite the inherently political nature of its work (Louis and Maertens 2021). This is in part because it sees itself as caught between the interests of multiple stakeholders (domestic workers, employers and governments). In contrast, the AMCB is an organization led and made up of MDWs with first hand experiences of migrating to work as domestic workers who prioritize the interests of these workers. Further, as a founding member of the International Migrants Alliance (IMA) — a global alliance of grassroots migrants and refugees — AMCB also connects its members with organizations of grassroots migrants in different national contexts to develop a more global perspective on migrants' issues, or what Rodriguez defines as an emergent *migrant labor transnationalism* (2013,740).

2.3 Substantive, intersectional and critical discourses on (in)decent work

Our main finding in this paper is that the AMCB puts forward more substantive, intersectional and critical discourses on (in)decent work for domestic workers

3. Immigration Department (2025, May 2). Statistics on the number of Foreign Domestic Helpers in Hong Kong (English), *Data. Gov. HK.*, https://data.gov.hk/en-data/dataset/hk-immd-set4-statistics-fdh/resource/b983aa1d-2617-4051-9ec1-dc5ca281b117.

than the ILO. The notion of *substantive equality* is defined in contrast with that of *equality as consistency* — both of which come from Fredman's work (2016). In the 'equality as consistency' approaches, equality is determined by how consistently a rule is applied across different groups, while more 'substantive' notions of equality additionally include concepts such as dignity, equality of results, and equality of opportunity. While equality as consistency is the more traditional and formal way of conceptualizing equality, treating two people the same does not ensure that both will receive appropriate treatment, or that the results of this equal treatment will be equally beneficial for both. Thus, Fredman (2016) argues that to more holistically address the situations of marginalized groups, policy should not be formulated on the basis of equality as consistency. Rather, it should be aimed at addressing (in)equality in substantive ways that draw from a multidimensional understanding of what counts as equality in a particular social context. The related notion of *intersectionality* was proposed by Crenshaw (1989) to demonstrate how the multiple marginalities of black women in the United States intersect to produce new forms of marginality that require different legal and political strategies that go beyond typical identity politics. Smith argues that intersectional approaches are more able to 'ensure discrimination law is able to address substantive inequality' (2016, 81) because these approaches attend to the lived experiences of marginalized people, rather than prioritizing a 'single-axis' analysis of marginalization that abstracts away from lived experience.

When we say AMCB's discourses are more critical, we are drawing on the notions of *dialogue* and *agonism* in policy work on theorizing social change (Ganesh and Zoller 2012). While the notion of dialogue privileges civility and assumes that relationship building is more effective than pressure tactics, agonism privileges conflict as an important element of change given existing power relations and the need for material and social reform. In privileging civility, power dynamics may not be made explicit, and the specific actions needed in order to bring about material change may not be clarified. Such vagueness in service of relationship building can lead to the construction of unclear norms or unclear pathways to achieving those norms (see also Matejak 2024). In contrast, more critical discourses are those which explicitly identify conflicts, place blame, and outline needed changes.

3. Methods: Comparing ILO and AMCB discourses

Our methods of discourse analysis are ethnographically situated (see Roth-Gordon 2020) and corpus-assisted (Baker et al. 2008). That is, our discourse analysis is practiced in the detailed attention we pay to particular instances in

which lexical items, particular phrases, or grammatical structures (do or do not) appear in the text. However, these textual details are not interpreted in isolation. Rather, we make sense of them in relation to our participant observations of the experiences and organizing work of migrant domestic workers in Hong Kong, and our interviews with migrant domestic worker leaders. Conducting ethnographically situated discourse analysis means that we see the textual detail in AMCB and ILO documents as a way of exploring 'macro-structures through micro details' (Blommaert 2008, 13; see also Wedeen 2010). In practice, this means that our analysis followed an iterative process in which understandings of linguistic details in texts were constantly (re)formulated in relation to our continually expanded understanding of the larger context. Furthermore, our use of corpus methods helped us to quantify the frequency of particular words or phrases, as well as their frequency of appearance with other words and phrases (i.e. collocations), as a way of triangulating the qualitative comparisons we make between the language of the ILO and the language of AMCB (see: Baker et al. 2008).

Our data consists of texts created by these organizations, interviews with leaders, and other materials generated from more than four years of ethnographic research with MDW-led organizations in Hong Kong. To select texts from AMCB we manually examined each of their Facebook posts from the creation of their Facebook page in November 2020 until October 2022 and extracted all posts with substantive original text. This meant excluding reshares, video posts and Facebook livestreams.[4] We then used the C189 articles as a way to categorize the various problems of (in)decent work that were highlighted in the AMCB statements. In this way, we were able to make direct comparisons between 13 of the 27 C189 articles and issues raised by AMCB. As one example, we directly compared C189 Article 11 on minimum wage coverage with AMCB's statements on their living wage campaign. In order to account for intra-organizational, cross-genre variation, we also examined an official AMCB submission to Hong Kong's Legislative Council and two ILO reports: one published in 2016 focused on the particular situation of MDWs, and the other published in 2021 evaluating progress made in achieving decent work since the adoption of C189. We compiled the texts of the organizations into two small corpora (a 16,077 word corpus for the AMCB and a 147,155 word corpus for the ILO), which allowed us to generate some descriptive statistics about keywords and collocations in the text. Because of the very small size of our corpus; however, we did not make any conclusions based on these quantitative data alone.

4. We did the same with the Facebook page of one of AMCB's member organizations, the Filipino Migrant Workers Union (FMWU). However, in the end we only included one post from FMWU because of the relevance of the content.

Our ethnographic engagements have generated a wide variety of materials including more than 50 recordings of interviews and speeches from MDW organizations, photos of rallies and placards from AMCB and its member organizations, detailed field notes on their campaigns, and reflections based on near weekly engagements in participant observation over the course of four years. For this study, special ethnographic attention was given to AMCB's campaigns for a living wage and their campaign opposing Hong Kong legislators who proposed denying visas to domestic workers they suspected of "job-hopping", i.e. changing employers before the end of their contracts. Members of the research team attended rallies, press conferences and information sessions hosted by AMCB and analyzed the ethnographic materials gathered in relation to these events in light of the ongoing textual analysis. In order to situate the ILO discourses we drew on secondary research into UN practices and analyzed additional ILO materials to historicize their discourses on "decent work" and the C189. We also drew from the second author's legal training and expertise in international politics to gain a more holistic understanding of the genres and uses of codified norms in the ILO.

4. Analysis

4.1 Equality as consistency vs. substantive equality

Our first finding is that the ILO calls for better treatment of domestic workers on the basis of comparison to other workers, whereas the AMCB discourses call for just treatment and an appropriate response to the material needs of MDWs, regardless of comparison. The AMCB discourses also give more emphasis to the notion of dignity and solidarity with other workers.

A frequently invoked phrase in the ILO's discourse — which can be found in the title of an online article and in postcards they distribute to raise awareness — is "Domestic work, work like any other."[5] In the ILO corpus as a whole, much of the language emphasizes the importance of overcoming the differences between how domestic workers are treated in comparison to other workers. An analysis of instances of *equal* across the ILO corpus reveals that the two most likely collocates are the words "treatment" and "other". While "equal treatment" implies comparison with non-domestic workers, the reference to "others" (as in "other workers") more directly makes non-domestic workers relevant to determining what constitutes decent work for domestic workers. This can also be seen in the

5. Source: ILO postcards: https://www.ilo.org/publications/postcard-domestic-work-work-any-other (last accessed 23 September 2024); ILO, (2014, June 16).

C189's repeated variations of their normative call for legal provisions for domestic workers that are "*not less favourable than those applicable to workers generally*" (see C189, Article 2, 6, 10, 12, 14, 16). Equality here is discursively constructed as a situation in which domestic workers are treated the same as "general workers".

The ILO presents discrimination as the main obstacle to achieving this equality with other workers. We can see this in the text of the preamble of C189, shown in (1) below.

(1) Domestic work continues to be undervalued and invisible and is mainly carried out by women and girls, many of whom are migrants or members of disadvantaged communities and who are particularly vulnerable to discrimination…
(C189, Preamble)

The language in the preamble suggests that it is not only the nature of domestic work that makes it undervalued, but also the types of people who are doing this work. For the ILO, the goal is to avoid discrimination against domestic workers, whether it be based on the nature of their work, their gender, or their migration status. Similarly, Article 11 from the C189 in (2) highlights concern with avoiding sex based discrimination.

(2) Each Member shall take measures to ensure that domestic workers enjoy minimum wage coverage, where such coverage exists, and that remuneration is established without discrimination based on sex. (C189, Article 11)

These phrases "where such coverage exists" and "without discrimination based on sex" imply comparison with other workers who may have a better situation than that of domestic workers. What is not addressed in Article 11, is the fact that male workers and those receiving minimum wage may still be receiving very low and exploitative salaries. This draws attention to the limits of equality that is primarily focused on consistent treatment across different categories of workers, without a more detailed consideration of how this treatment is experienced by workers themselves.

In comparison to the ILO, AMCB discourses on decent work for domestic workers go beyond discourses on equality as consistency. They do this in three ways: by calling for just treatment that meets the material needs of MDWs, by expressing solidarity with others, and by emphasizing their own dignity. As an example of discourses that highlight the need for a just response to material conditions, consider (3) which is taken from an AMCB statement demanding a living wage for MDWs.

(3) Our demand for a living wage is just right, as migrant domestic workers' wages has been frozen for two years now. The inflation is very high, that causes the skyrocketing of prices of food and other basic commodities, transportation etc …Worse, we are still excluded from the economic subsidies provided by the Hong Kong government for the community.

(AMCB Statement, 26 September 2022)[6]

The AMCB statement frames the problem of wages as one of material subsistence directly related to the lived experiences of MDWs. This can firstly be observed in their purposeful choice to use the term "living wage" — wages that are needed to cover one's livelihood — as opposed to "minimum wage" — wages that meet the minimum legal requirement. Furthermore, the AMCB justifies their demand for a living wage with a description of their material and economic situation. They make reference to their frozen wages over the past two years (because of the COVID-19 pandemic) in contrast to the inflation that has increased the price of their basic necessities, and in relation to their exclusion from government welfare subsidies meant to offset pandemic related expenses and income loss. This last point is about equality as consistency since migrant domestic workers were uniquely excluded from repeated government payouts to other residents. However, the image of "decent work" that is constructed in the AMCB statement is more comprehensive than simply equal treatment with others. Rather, it is concretely linked to MDW's lived experiences, as it shows how intersecting factors (the pandemic, frozen wages, inflation, exclusion and low wages to begin with) lead to particular material conditions for migrant workers that require a living wage as a just and humane response.

Notably, in contrast to the above examples from the ILO, the AMCB does not invoke gender in its statements on wages. Based on our ethnographic observations, it seems that members and spokespersons of AMCB see gender issues as a way to call for greater solidarity (see also Lai 2018). Consider a quote from AMCB spokesperson Sringatin who voiced herself speaking to female employers by saying, "You are not our enemy, but we need to be united to get our dignity". Despite their recognition of gender as a relevant factor in oppression, however, AMCB's calls for just treatment of MDWs center primarily on descriptions of the material needs and experiences of these workers, rather than on comparisons between the treatment received by people of different genders.

The AMCB slogan "We are workers, we are not slaves", and the way it is interpreted by MDW leaders, similarly includes and also goes beyond equality as consistency. This slogan is often included at the end of AMCB's written statements,

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6. Asian Migrants Coordinating Body -AMCB (2022, November 26). *Press Statement: No more delay, Living wage for All MDW.*

printed on placards, and used as a chant in their various picket actions. In particular, we asked AMCB spokespersons about the reason behind the use of the word "slaves". Spokesperson Eman Villanueva, noted that the slavery of MDWs is "very clearly expressed" in the fact that they are forced [by government policy] to live in the houses of their employers without regulations on their working hours. The "live-in" policy is unique to MDWs, and thus points to the need for equality as consistency. However, Eman also situated the experiences of MDWs within the view that "all workers under capitalist system[s]" are "slaves of capital", and he made reference to many other "working sectors in Hong Kong that can be considered as modern slaves" such as city cleaners, dishwashers and those working in nursing homes, given that "they work so hard" and are paid very little. In this interpretation then, the image of "decent work" that is constructed by the AMCB's slogan is one in which domestic workers are treated equal to other workers, *and* where all workers — including domestic workers — are free from slave-like oppression. Sringatin interpreted the slogan in terms of "dignity", in a way that also includes, but goes beyond equality as consistency, highlighting that as migrants in Hong Kong, MDWs are treated differently from others, and that the slogan allows MDWs to "be confident to say that we are workers, we are human, and we are not slave[s]." This interpretation points to the relevance of MDWs recognizing their own humanity and demanding this recognition from others. While such a view may already be implicit in the ILO's discourses that emphasize "domestic work is work like any other", the issue of human dignity is drawn out more explicitly in Sringatin's comments.

A quantitative comparison of the texts from the ILO vs. AMCB further illustrates the distinction between discourses on equality as consistency vs. discourses on substantive equality across the organizations. The ILO uses *equal* much more frequently than it uses slav*, whereas the AMCB uses slav* much more frequently than it uses *equal*. More precisely, the ILO corpus has 236 tokens of *equal* and 12 tokens of slav*, whereas the AMCB has 25 tokens of slav* and 3 tokens of *equal*. Given what we have noted above about *equal* collocating with words that suggest comparison with other workers in the ILO corpus, and "slavery" being associated with dignity and solidarity in the discourses of AMCB spokespersons, these quantitative observations further support our argument about the differences between the organizational discourses.

4.2 Single-axis vs. intersectional discourses

Another way in which the AMCB's discourses on equality are more substantive than the discourses of the ILO relates to how these organizations portray the intersectional forms of oppression that MDWs face. The ILO tends to take a

single-axis approach, which addresses the inequality of MDWs one category at a time, while AMCB's discourses allow for an accounting of the specific and multi-faceted ways in which MDWs are made unequal. As an example, consider Table 1 below which compares how the two discuss the rights of migrant workers and of abused domestic workers. The two parts under the ILO Column are two different articles from the C189, whereas the two parts under the AMCB column are different excerpts from one statement from AMCB. This statement was issued on 27 June 2021 regarding the abuse of a number of MDWs.

Table 1. Abuse of MDWs

ILO	AMCB statement
C189, Article 5: Each Member shall take measures to ensure that domestic workers enjoy effective protection against all forms of abuse, harassment and violence.	Part 1: One worker, Ina, was made to take care of 75 dogs, 8 turtles, 8 tanks of fishes and birds and worked from 9am to 4am. Whenever the male employer got angry, she was not allowed to sleep and made to work throughout the night. Further, he physically abused her regularly. Ina found courage to escape after the most recent abuse.
C189, Article 8.3: Members shall take measures to cooperate with each other to ensure the effective application of the provisions of this Convention to migrant domestic workers.	Part 2: We strongly condemn the HK Government for denying the job applications and deporting 850 terminated MDWs in the past 6 months over false accusation of job-hopping among MDWs. The cases of Ina and her coworkers and Eden show how much MDWs will take on to not risk losing their jobs …in fear of being accused of job hopping.*

* Asian Migrants Coordinating Body-AMCB, (2021, June 26). HK Asian Migrants alarmed over the increasing numbers of violence among MDWs. Justice for Ina, Eden and all MDWs in Hong Kong.

First note how the AMCB statement constructs a more detailed picture of the lived experiences of domestic workers than the C189. Article 5 strategically uses discourses that draw on broad categories to apply to all cases of abuse of domestic workers. While useful in ensuring that a wide range of contexts are accounted for, what constitutes abuse is left underspecified and abstract. In contrast, the statement on Ina's abuse prioritizes the details of her material experience, highlighting not only the prototypical forms of domestic abuse she suffered — being regularly physically abused — but also the abuse she suffered as a result of being overworked and overburdened by the care of an extreme number of animals. Additionally, in part 2 of the AMCB statement, we see an intersectional discourse linking abuse, domestic work and migration. The language in part 2 links the particular case of Ina to the situation of MDWs more generally.

To provide some context on part 2, the idea that MDWs are "job-hopping" is a discourse that circulates in both social and political contexts in Hong Kong. The premise is that MDWs terminate their contracts prematurely in order to change to other employers who are willing to pay more, and thus are taking advantage of the system and putting their employers in precarious situations.[7] Regardless of the fact migrant workers are actually reluctant to change employers due to their own economic precarity, many policies are in place in order to "combat" such job-hopping and "protect" employers, leading to the above-mentioned deportation of 850 workers who were deemed to have changed their employers "too many times".

The AMCB makes the issue of job-hopping relevant to these cases of abuse by highlighting how these denied applications and deportations can prolong situations of abuse for MDWs. In so doing, this text accounts for the intersectional forms of oppression facing MDWs in Hong Kong. It is not only their position as domestic workers (mostly women who work in the private homes of employers) which leaves them open to domestic abuse, but also their identities as migrant workers (who may have their application for new employment visas denied because of quitting their job) that keeps them in situations of abuse longer than they would stay otherwise. Comparing this to Article 8.3 from the ILO convention, we can see that it fails to capture how the intersectional nature of being a migrant worker and a domestic worker can lead to qualitatively different forms of oppression.

We also examined the ILO's 2016 report on *migrant* domestic workers, to see if this longer report might do more to highlight the intersectional forms of oppression facing MDWs. There is one section in this report, which foregrounds the intersectional nature of these workers' experiences of abuse. It highlights that seeking redress for abuse is doubly difficult for MDWs, because they not only face workplace isolation as domestic workers, but they also "depend on their employers for their work and visa permits" (ILO 2016, 68). However, this is the only clear reference to intersectional oppression in the context of abuse within a 112 page document.

7. See for instance: Leung, H. (2023, February 15). *Domestic Workers' union slams Hong Kong lawmakers' 'racist' proposals as legislature discusses crackdown on 'job-hopping'*. Hong Kong Free Press HKFP. Retrieved April 14, 2023, from https://hongkongfp.com/2023/02/15/domestic-workers-union-slams-hong-kong-lawmakers-racist-proposals-as-legislature-discusses-crackdown-on-job-hopping/

4.3 Governments as the solution or the problem?

When it comes to evaluating government stakeholders, the ILO uses language that encourages governments to take further action while obscuring their past failings, while AMCB uses critical and affective language to position governments as the cause of many of the hardships faced by domestic workers. The differing stances that the two organizations take towards government stakeholders results in different discourses on solutions and problems when it comes to norms for decent work.

Starting with the C189, we can observe the following phrase, which appears in most of the articles of the convention: "each member shall". Take for instance, Article 8 in (4) below.

(4) *Each member shall* take measures to ensure that domestic workers, like workers generally, enjoy fair terms of employment as well as decent working conditions. (C189, Article 8, emphasis added)

This phrasing is consistent with the genre and purpose of the convention, as it is meant to codify norms for member states to ratify and adopt. Thus, this language fits the broader goal of conventions, discursively and institutionally positioning member-states as potential agents in bringing about decent work for domestic workers. When it comes to specifying the agents causing the conditions of indecent work, however, the C189 relies on nominalization or passivization, or simply avoids references to any responsible party. For instance, in Article 8 mentioned above, there is no clarity as to who is excluding domestic workers from "fair terms of employment" or "decent working conditions". In fact, across the thirteen C189 articles examined, we found only one case in which the stakeholders causing indecent work are alluded to.[8]

In stark contrast, the AMCB statements explicitly critique and blame stakeholders they see as causing the conditions of indecent work for domestic workers. The target of their criticisms are most frequently governments. Negative evaluation of the Hong Kong government can be seen in a number of their statements, where they use affective terms such as "condemn" (see Table 1) or "outraged" (AMCB Statement 23 March 2022)[9] to describe their reactions to the government decisions or announcements. While most of their criticisms are targeted toward the Hong Kong government, sending governments are also criticized in AMCB

8. This is Article 5 which alludes to the fact that employment agencies create conditions of indecent work (ILO, 2011, Article 5.1.e).

9. Asian Migrants Coordinating Body -AMCB (2022, March 23). *Press Release: Migrant domestic workers once again call for inclusive HK Stop neglecting migrant domestic workers!*

statements. The quote in (5) for instance, positions sending country governments as responsible and complicit in creating the situations of abuse in which MDWs find themselves.

(5) Our own governments must support the workers and their families as it is the government's own Labor Export Policy that is responsible for sending them abroad. Had there been access to meaningful employment back in the Philippines or Indonesian, they would not have applied to work overseas to begin with. [10] (AMCB Statement 27 June 2021)

As a whole then, AMCB and its member organizations are critical of both sending and receiving governments — positioning them as the primary causes of indecent work for domestic workers.

Quantitative comparisons across the two corpora highlight the differences between the two organizations even more starkly. Across AMCB texts, 40% of the instances of government* (44/108) were cases of explicit criticism of government stakeholders, and less than 1% (1/108) were cases of praise for government stakeholders. In contrast, in the ILO corpus, 30% (44/145) of all tokens of government* were instances of *praise*, and less than 6% (8/145) were instances of criticism. In short, the ILO almost never criticizes governments and frequently praises them, while the AMCB almost never praises governments, but frequently criticizes them.

Given its tripartite structure, the ILO sees social dialogue between the three stakeholders as a crucial element in bringing about decent work. This can be seen for instance, in its 2021 report on "Making decent work a reality for domestic workers". The first full page graphic in the executive summary of this report (xxii) illustrates the processes involved in achieving decent work for domestic workers. Tripartite social dialogue is included in this graphic as both the starting point (Image 1), and as a crucial part of the empowerment that should result from arriving at decent work (Image 2). The language of "social dialogue between employers, workers, and governments", combined with the graphics in which two figures stand side by side on equal footing (Image 1 and Image 2) gives an image of "social dialogue" as a collaborative and mutual process that draws on a foundation of equality in order to enhance relationship-building and cooperation.

10. Asian Migrants Coordinating Body -AMCB (2021, June 27). *HK Asian Migrants alarmed over the increasing numbers of violence among MDWs Justice for Ina, Eden and all MDWs in Hong Kong.*

Image 1. The start

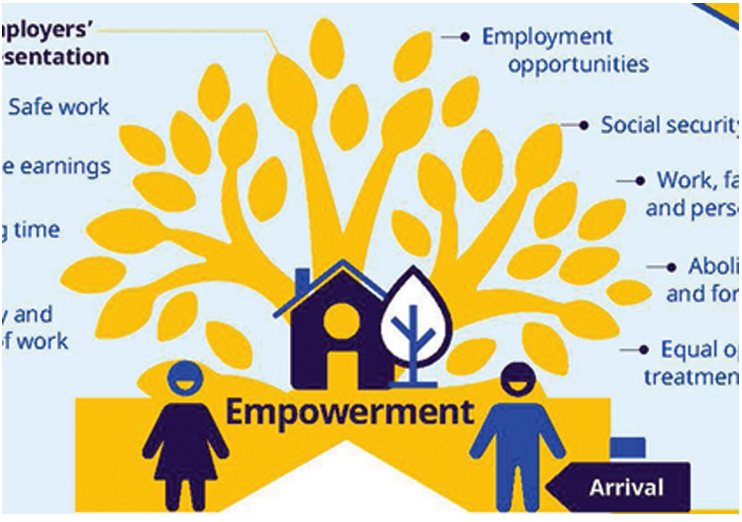

Image 2. Arriving at decent work[11]

In contrast, AMCB spokespersons argued that this type of social dialogue is characterized by inequality and is ineffective in bringing about genuine material change for MDWs. Spokesperson Dolores Balladarez Pelaez shared that social dialogue with government representatives in Hong Kong is "just a show" that on

11. Copyright © International Labour Organization 2021

its own cannot bring about "any essential changes". Pointing to improvements in the rights of domestic workers in Hong Kong, she argued that these were "a product of the struggle of migrant workers" who were engaged, not only in social dialogue, but also in more agonistic forms of resistance. Consider the following as one example of how this is practiced. In a recent annual meeting with the Hong Kong Labour Department, migrant organizations conducted a rally outside prior to the meeting to highlight their frustration with the fact that only a limited number of migrant organizations were permitted to attend the meeting. Then, when the meeting started, a select number of those permitted leaders (including representatives of AMCB) went inside the building and joined the official dialogue with the Labour Department to present their points according to the institutional norms for such meetings. As a whole then, not only is the AMCB more critical of government stakeholders than the ILO, they also construct a more multidimensional image of the processes and roles involved in working towards decent work.

5. Conclusion

The empirical data presented here demonstrate that despite some significant overlap, the discourses of the ILO and the AMCB construct two different understandings of decent work for domestic workers. The reasons behind these differences are the material and ideological dimensions of the contexts from which these discourses emerge. The discourses of AMCB emerge from the firsthand experiences of MDWs who have access to the details of what it is like to be a MDW. On the other hand, while the various social actors involved in producing texts for the ILO undoubtedly have material lives of their own, these lived experiences differ in substantial ways from those of domestic workers. As a result, those working in the ILO rely on discursive information about the experiences of domestic workers, which by its very nature lacks some of the embodied details available through lived experience. From an ideological perspective, the AMCB takes up a class-based and agonistic orientation to social change, whereas the ILO attempts to frame itself as a neutral organization that works for the good of all three stakeholders (governments, employers and domestic workers) (Louis and Maertens, 2021).

An understanding of the different images produced by grassroots vs. multilateral organizations suggests that scholars need to take knowledge from the grassroots into account alongside knowledge coming from global institutions. A number of scholars have highlighted the ways in which the UN presents itself and functions as a "knowledge system" and "provider of information" (Svenson, 2016; Louis and Maertens, 2021). A critical view informed by the data examined in this

study, suggests that UN knowledge, while still useful, is constrained in terms of its ability to capture intersectional and detailed accounts of marginalization, and in terms of its ability to assign blame and responsibility. Accordingly, for both scholars and students to develop a more holistic understanding of the rights of oppressed people, it is necessary for them to engage not only the UN, but also grassroots organizations.

This study also adds to theorizations of what 'the summit' and 'the grassroots' have to gain from cross-scalar collaborations (Uvin 1995; Montoya 2013), by demonstrating that even when the overarching norms appear to be the 'same', the discourses around these norms may construct qualitatively different images of what constitutes "decent work" and the obstacles to getting there. This finding suggests that one of the reasons continual dialogue between grassroots and multilateral organizations is needed is because they produce differing discourses on the issues at stake — with the grassroots organizations capturing many of the substantive, intersectional and critical perspectives needed to effect normative change.

While a full discussion of the steps needed to achieve this continual dialogue is beyond the scope of this paper, it is important to note that this work is being carried out in an ongoing way by grassroots organizations and select NGOs who are continuously building the capacity of grassroots migrants, informing them on multilateral decisions about migration, and facilitating their participation in these discussions. From ethnographic observations, we see that this work involves many different components, including but not limited to grassroots alliances like AMCB and IMA, and NGOs like the Asia Pacific Mission for Migrants (APMM) educating grassroots migrants on the reasons for their migration, building their confidence in speaking out, assisting them in navigating the bureaucracies associated with participation in multilateral discussions and more. As one example of how academics can play a role in this work: the findings of this research were presented to around 100 migrant members of AMCB alongside reflections from AMCB and IMA leaders. AMCB leaders assessed this sharing as useful in building the confidence of their members to continue speaking about their experiences and issues. Thus, we see our research as making a small contribution to their long-term work of organizing and empowering grassroots migrants to engage in norm setting at local and global levels.

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