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Special Issue - Care Work, Intimate Labour, Migration, and Exploitation

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Bangladeshi Women Domestic Workers' Experiences of Intimate Labour in Saudi Arabia

Reproductive Labour, Commodification, and Gestational Surrogacy in Greece: A materialist feminist approach

Intimate Labour, Gendered Violence, and Exploitation among Live-in Home Care Workers in Kerala, India

Intimacies in Tension: Bodily labour across sex work and domestic work in Southern Europe

Between Appreciation and Exploitation: Employer perceptions, attitudes, and household dynamics in Hong Kong's domestic work sector

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ANTI-TRAFFICKING REVIEW

Special Issue

**CARE WORK, INTIMATE LABOUR, MIGRATION, AND
EXPLOITATION**

Issue 27, September 2026

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The *Review* is primarily an e-journal, published biannually. The journal presents rigorously considered, peer-reviewed material in clear English. Each issue relates to an emerging or overlooked theme in the field of anti-trafficking.

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Editorial: Challenging the Boundaries of Care Work: Gendered violence, intimate labour, and migration

Shih Joo Tan, Lubna Jebin, and Marie Segrave

Abstract

This Editorial introduces a Special Issue of *Anti-Trafficking Review*, focusing on the intersecting themes of care work, intimate labour, migration, and exploitation.

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Introduction

This Special Issue of *Anti-Trafficking Review* was prompted by a provocation to push forward the ways in which we consider gendered labour and gendered violence as experienced by women more generally, and migrant women more specifically. Policy and regulatory responses have tended to construct women's experiences through prevailing frames of violence against women (i.e. violence enacted by intimate partners that happens in private), or labour exploitation (i.e. violence enacted by employers/senior colleagues that happens in the workplace), as though they are distinct and separate matters. At the same time, the intertwining of exploitation, caring relations, and intimacy within care work and intimate labour, and manifold ways in which these aspects are central to women's work, have been rendered invisible, and thus, remained largely unprotected in labour and migration system settings. There is a substantial body of scholarship and activism that focuses on labour rights, women migrant workers, and migrant care work more broadly. However, there are gendered aspects of labour and women's experiences of violence and exploitation that we need to illuminate and continue to wrestle with. These aspects pose a challenge to the accounting for this work, as well as give rise to the discomfort in labelling and recognising care and intimacy as aspects of labour, given their gendered and familial associations with ways of caring and being (i.e. as extensions of mothering).

We invited articles that sought to push these boundaries from a range of perspectives. This culminated in an issue that collectively offers important insights and extends our purview of the complexities that characterise the intersections of intimacy, care, and work. Drawing on different theoretical perspectives and empirical datasets, these articles further offer key considerations around the continuities of violence and exploitation in women migrant workers' lives, as well as the implications of these intersections for how to protect and enable their rights. We focus specifically on three themes that come to the fore in this issue: first, the persistence of gendered violence in care work and intimate labour. Second, the ways in which affective relationalities in the worker–employer relationships impact on various dynamics of labour. Further, how intimacies are enabled and relied upon, whilst equally being denied and devalued in these settings. And third, how violence affects so many aspects of women's lives that violence in the workplace as well as public or private settings is not usefully distinguished or distinguishable. This is not least because of the ways in which all forms of violence, including domestic and family violence, as well as class, caste, racial, and religious discrimination impact on women's daily lives. Taken together, what is clear is that research that examines the complexities and entanglements of gender, violence, intimacy, and care work is critical to challenging and exposing the gaps in systems that continually attempt to produce clear demarcations in what is or is not 'counted' as work, as violence, or as exploitation. This must continue to be challenged in order to more comprehensively work towards addressing exploitation and gendered violence in their myriad forms.

Persistence of Violence and Exploitation in Care Work and Intimate Labour

The 'crisis of care'¹ and the concomitant reliance on poor, racialised, and migrant women to provide care and reproductive labour in private households is a story that is now all too familiar to us. Data from the International Labour Organization (ILO) indicate that migrants constitute a significant proportion² of the global care economy, and the vast majority of them are migrant women working in long-term residential care facilities and home-based care services, including as domestic workers. At the height of the COVID-19 pandemic, there was global recognition of frontline migrant care workers, particularly those employed in healthcare, as an essential labour force.

¹ E Dowling, *The care crisis: What caused it and how can we end it?*, Verso, London and New York, 2021, p. 12.

² See N Popova and A Rakotonarivo, *ILO Global Estimates on International Migrant Workers: International migrants in the labour force (4th Edition)*, International Labour Organization, Geneva, 2024, p. 16, <https://www.ilo.org/publications/major-publications/ilo-global-estimates-international-migrants-labour-force>.

However, the pandemic also acutely exposed the scale of risks and harms that migrants in care work, especially migrant women in home-based care, are routinely subjected to.³ For example, studies had documented how travel restrictions and lockdown measures, implemented to prevent the spread of the virus, led to a deterioration in their working and living conditions (e.g. extended working hours, long periods of confinement in employers' households, exacerbated constraints on workers' mobility, and increased social isolation).⁴ Notwithstanding the unequal impacts to migrant care workers and inequitable working conditions that they had to navigate during the pandemic, this was not a sudden disruption from an otherwise well-functioning employment context.⁵ Rather, as Schillinger, Schwiter, and Steiner observed, 'in many care jobs, the purported "normal" was already a crisis situation, as the status quo in care work had never reflected labour standards expected and upheld in other employment fields.'⁶

This is clearly exemplified in the short article by **Sifat Aiman** in this Special Issue, which describes how the 'dual abandonment' of women migrant domestic workers by employers *and* governments during armed conflict is not an isolated event or individual misfortune. Instead, she argues that it needs to be understood against the latent violence that is embedded in care labour and migration structures, which traps women migrant domestic workers in a systemic zone of non-responsibility. In this context, abandonment during armed conflict becomes a predictable outcome rather than an isolated or unfortunate accident. **Runa Lazzarino, Eleonore Kofman, and Sobia Kapadia's** examination of migrant Filipina domestic workers' employment experiences in Pakistan illustrates a similar point. They note that situations such as the intensification of workloads and increased restrictions on women's mobility during the pandemic could occur because the women were required by labour migration regulations to work and live in employers' homes. Thus, the pandemic simply exacerbated a 'crisis situation' that had already existed.⁷

³ L Foley and N Piper, *COVID-19 and women migrant workers: Impacts and implications*, International Organization of Migration, Geneva, 2020, retrieved 10 August 2026, <https://publications.iom.int/system/files/pdf/covid19-and-women.pdf>.

⁴ J Ham, 'Anti-pandemic measures, labour rights, and the legibility of harm in domestic work', in P Davis and M Rowe (eds.), *Criminology of the Domestic*, Routledge, New York and Abingdon, 2023, pp. 117–134.

⁵ S Schillinger, K Schwiter, and J Steiner, 'Care crises and care fixes under COVID-19: The example of transnational live-in care work', *Social & Cultural Geography*, vol. 24, issue 3–4, 2023, pp. 391–408, <https://doi.org/10.1080/14649365.2022.2073608>.

⁶ *Ibid.*

⁷ Foley and Piper.

The prevalence and persistence of violence and exploitation experienced by migrant women in care work is well established. An extensive body of empirical research has documented wage theft; overwork; passport confiscation; restricted mobility and communication; physical, verbal, and sexual violence; as well as legal dependency on employers.⁸ In seeking to understand the factors that contribute to, sustain, and normalise the exploitation of migrant care workers, scholars and labour rights activists have highlighted the importance of framing women's experiences against the structural interplay of exclusionary labour laws,⁹ restrictive migration regimes,¹⁰ and gendered norms that inform the standards and expectations of the care industry.¹¹ While much of the focus has predominantly been on migrant women employed as live-in domestic workers, there are critical lessons that are equally applicable to other forms of care and reproductive work as well as, more broadly, feminised industries that are characterised by the commodification of 'intimate labour'.¹²

One of the lessons is the need to formally recognise these forms of labour as 'genuine work' (rather than 'love work' performed out of affection or for altruism and emotional fulfilment) and, accordingly, ensure that migrant care workers possess equal contractual and labour rights as other workers.¹³ While the inclusion within labour law frameworks does not erase other migration-related issues with access and awareness,¹⁴ clear legal definitions constituting acceptable conditions of work and standards of employment can allow for a stronger legibility of harms in these employment contexts.¹⁵ This, in turn, creates space for individual

⁸ B Anderson, *Worker, helper, auntie, maid?: Working conditions and attitudes experienced by migrant domestic workers in Thailand and Malaysia*, International Labour Organization, Bangkok, 2016.

⁹ V Mantouvalou, 'Human rights for precarious workers: The legislative precariousness of domestic labor', *Comparative Labour Law & Policy Journal*, vol. 34, issue 1, 2012, pp. 133–165.

¹⁰ B Anderson, 'Migration, immigration controls and the fashioning of precarious workers', *Work, Employment and Society*, vol. 24, issue 2, 2010, pp. 300–317, <https://doi.org/10.1177/0950017010362141>.

¹¹ D K Barker, 'Querying the paradox of caring labor', *Rethinking Marxism: A Journal of Economics, Culture & Society*, vol. 24, issue 4, 2012, pp. 574–591, <https://doi.org/10.1080/08935696.2012.711065>.

¹² E Boris and R S Parreñas, 'Introduction', in E Boris and R S Parreñas (eds.), *Intimate Labors: Cultures, Technologies, and the Politics of Care*, Stanford University Press, Stanford, 2010, pp. 1–12.

¹³ J Fudge, 'Feminist reflections on the scope of labour law: Domestic work, social reproduction and jurisdiction', *Feminist Legal Studies*, vol. 22, 2014, pp. 1–23, <https://doi.org/10.1007/s10691-014-9256-2>.

¹⁴ Anderson, 2010.

¹⁵ Mantouvalou.

or collective contestation against exploitation and violence experienced by care workers.¹⁶

The need for robust legal and regulatory responses is raised in several articles in this Special Issue. For example, **Anakha Ajith's** article explores how the absence of clear employment standards for in-home domestic and care workers in Kerala (and India more broadly) translated to a significant ambiguity both in relation to scope of responsibilities as well as the degree of control and surveillance that employers had over in-home caregivers. The author notes that, while there are piecemeal initiatives in the form of minimum wage notifications, inclusion within workplace sexual harassment legislation, and attempts to professionalise the private eldercare sector, there is no central legislation that clearly demarcates the household as a workplace or affords workers enforceable labour rights. Drawing on interviews with women employed as in-home caregivers for elderly persons, Ajith notes that within this fragmented legal regulatory context, gendered moralities of care and expectations of altruism sit alongside poor employment standards (i.e. low wages, long working hours, and restricted mobility) to frame the parameters of work and working conditions.

Focusing on surrogates in Greece, **Athena Michalakea and Anastasia Rousaki's** article undertakes a case law analysis approach and argues for the need to shift away from current legal constructions of surrogacy as an altruistic, non-commercial, and consensual act. The authors note that this framework effectively erases surrogates' labour and obscures the risks and harms they experience, which undermines the stated objective of safeguarding surrogates from exploitation. Likewise, in their comparative analysis of domestic work and sex work, **Isotta Rossoni and Begoña Aramayona** note that while violence is a structural possibility for both sex workers and domestic workers in Spain, Italy, and Malta, the distinct regulatory regimes of both sectors have differentially shaped how labour, intimacy, and exploitation are constructed, understood, and responded to by workers in these sectors. Based on interviews with over 50 migrants who had worked either as sex workers or domestic/care workers, the authors further found that respondents' migration status directly shaped their capacity to report exploitation and violence, change jobs or employers, as well as negotiate boundaries and working conditions.

Migration status and restrictive migration systems create the conditions and leverage for gendered violence¹⁷ and labour exploitation.¹⁸ In this Special Issue, **Lubna Jebin and JaneMaree Maher** examine how the *kafala* system in Saudi

¹⁶ *Ibid.*

¹⁷ M Segrave and S Vasil, *The borders of violence: Temporary migration and domestic and family violence*, Routledge, Abingdon and New York, 2025, p. 57.

¹⁸ Anderson, 2010.

Arabia contributes to ongoing and persistent forms of exploitation and violence of other systems and constrains the ways in which Bangladeshi migrant domestic workers navigate and negotiate their safety and security. They explore these issues through qualitative interviews with 18 returnees, detailing both the significant exploitation they experienced (i.e. economic, physical, and sexual violence) and the ways in which they asserted agency and resistance. Specifically, the authors map how the *kafala* system institutionalises women's precarity by granting employers absolute legal authority over their mobility and legal status in the country. This systemic control manifests inside the home workplace as a repetitive assertion of dominance, weaving structural and physical violence into the very fabric of everyday care and domestic work.

Drawing on Galtung's framework of structural violence, **Aiman's** article, too, reveals how dual abandonment of women migrant domestic workers is a direct consequence of the migration regime. She highlights how the process for repatriating or evacuating women during armed conflicts is complicated because their passports or other travel documents were confiscated by employers during peacetime.

Bringing a different perspective, **Isla Mairi Wilson and Yuniar Paramita Sari's** research with employers of migrant domestic workers in Hong Kong reveals how the labour migration regime provides leverage for employers to control workers' time and personal autonomy and normalises exploitative conditions despite migrant domestic workers' de jure protection under Hong Kong law. Together, these articles offer a critical examination of structural conditions which are producing and sustaining violence that is largely unseen and occurs as a consequence of these structural conditions.

Centring Affective Relationality and Intimacy in Responses to Exploitation

Another issue that sits at the centre of longstanding feminist debates and discussions is the complex interplay between intimacy, affective relationalities in worker–employer relationships, and exploitation. On one hand, scholars have argued that the asymmetrical power relations in these employment relationships mean that intimacy and affective relations can become levers to exploit migrant women.¹⁹ For example, studies with women migrant domestic workers have shown how the language of 'familial inclusion' can be selectively invoked to

¹⁹ M de la Luz Ibarra, 'My reward is not money: Deep alliances and end-of-life care among Mexicana workers and their wards', in E Boris and R S Parreñas (eds.), *Intimate Labors: Cultures, Technologies, and the Politics of Care*, Stanford University Press, Stanford, 2010, pp. 117–131.

secure workers' emotional commitment to the household and withdrawn at the employers' discretion.²⁰ On the other hand, there is also recognition of how migrant women strategically and actively deploy intimacy and affective relationalities (e.g. being part of the family) within the workplace to subvert employers' authority and control,²¹ as well as obtain tangible benefits (e.g. contract renewals, regular pay, stronger bargaining power) and immaterial rewards (e.g. feeling respected, being treated with empathy and understanding).²² As Anderson aptly articulates, 'homes are spaces of emotion, they are not just where jobs get done, and these emotions are not simply extras but go to the heart of the employment relation.'²³

Current labour laws and migration policies sustain conditions for exploitation as they remain fundamentally limited by their failure to account for these relational dynamics that shape the nature of care work and intimate labour.²⁴ At the same time, there is a structural reliance on the gendered logics of intimacy, love, and familial obligations within employment relationships to sustain the global care economy.²⁵ In normalising what would be considered unacceptable labour standards in other contexts as 'part of the job' and expecting women care workers to negotiate their terms of employment, current policy and regulatory frameworks ignore how intimacy and the intimate nature of home-workplaces fundamentally alter everyday power relations.²⁶ This has particular implications for migrant women who are already experiencing significant intersectional disadvantages in relation to gender, class, race, caste, nationality, and legal status. In this way, existing policy discourses fail to recognise how emotional ties, spatial isolation, and personal dependencies are leveraged to enforce migrant women's subordination.

²⁰ Anderson, 2016.

²¹ R S Parreñas, *Servants of Globalization: Women, Migration and Domestic Work*, Stanford University Press, Stanford, 2015, p. 150.

²² S J Tan, *Gendered labour, everyday security and migration: An examination of domestic work and domestic workers' experiences in Singapore and Hong Kong*, Routledge, Abingdon and New York, 2023, p. 152.

²³ Anderson, 2016, p. 44.

²⁴ F Robinson, 'Beyond labour rights: The ethics of care and women's work in the global economy', *International Feminist Journal of Politics*, vol. 8, issue 3, 2006, pp. 321–342, <https://doi.org/10.1080/14616740600792871>.

²⁵ N Schoenbaum, 'The law of intimate work', *Washington Law Review*, vol. 90, issue 3, 2015, pp. 1167–1244.

²⁶ S J Tan, 'When the home is also the workplace: Women migrant domestic workers' experiences with the "live-in" policy in Singapore and Hong Kong', *Anti-Trafficking Review*, issue 20, 2023, pp. 75–91, <https://doi.org/10.14197/atr.201223205>.

Critically, when the harms that women experience are disregarded and remain illegible within current policy and regulatory frameworks, it negatively impacts the allocation of resources and stymies efforts to address these issues.²⁷ While critical feminist research has documented how women's claims for legal recognition often require problematic demands on the part of women to become 'worthy' victims, it has also recognised that legal legibility (i.e. the formal recognition of harms) is intertwined with access to resources.²⁸ In the space of care work and intimate labour, legal *illegibility* associated with these forms of gendered labour means that women must continuously negotiate, adapt, and resist these conditions without effective formal support or legal protections.²⁹ Further, as women's everyday strategies of survival and workplace negotiation have mostly existed outside traditional labour rights paradigms,³⁰ regulatory and policy frameworks have largely dismissed these relational realities as peripheral, private matters that are 'part of the job'.³¹ This then contributes to an erasure or disregard for the systemic and structural nature of exploitation and violence that is embedded within normative gendered standards and performances of labour.³²

These unresolved tensions around the circulation of intimacy and affective relationalities, and what they mean for how we make legible and respond to the risks and harms that cut across the traditional public–private/labour–love divide, are also explored in this Special Issue. They are clearly exemplified in the short article by **Jonathan Blagbrough and Tsion Degu**, which focuses on child domestic labour. Drawing on the learnings from an NGO project in Addis Ababa, Ethiopia, the authors note that, because of the way in which children enter into live-in domestic labour and the nature of their employment, protection efforts need to focus on relational and social environments that shape the everyday working and living conditions of child domestic workers. Similarly, **Rossoni and Aramayona**'s article describes the skill and effort involved in performing

²⁷ Ham, p. 118.

²⁸ P.L. Sweet, 'The paradox of legibility: Domestic violence and institutional survivorhood', *Social Problems*, vol. 66, issue 3, 2019, pp. 411–427, <https://doi.org/10.1093/socpro/spy012>.

²⁹ *Ibid.*

³⁰ It is important to note here that on the national and supra-national level, there are key networks of labour activism, primarily led by women migrant workers who have campaigned and mobilised for stronger rights and welfare. This has led to the passage of the ILO's *Domestic Workers Convention* (C189) and the accompanying non-binding Recommendation (R201) in 2011. However, the Convention has been ratified by only 40 countries, and many migrant-receiving jurisdictions, such as Singapore, Saudi Arabia, Hong Kong, and the United Kingdom, have not yet ratified it.

³¹ Tan, *Gendered labour, everyday security and migration*, p. 139.

³² *Ibid.*

‘authentic’ intimate and affective engagement in sex and domestic work, rendering it a professionally practised form of relational labour. At the same time, the authors reflect on how the performance of intimate labour and affective engagement can lead to clients or employers overstepping or violating work agreements, while also being employed by workers to negotiate boundaries and resist exploitation.

The weaponisation of fictive kinship by employers and employment agencies to facilitate exploitative and affective violence against women migrant workers was also a core thematic focus in other articles. Drawing on an intimate labour lens, **Jebin and Maher** unpack how intimacy and the intimate nature of the domestic workplace facilitate violence that is often obscured in traditional labour law and migration frameworks. They note how women’s precarity is structurally embedded in restrictive migration rules and further initiated prior to departure through unregulated recruitment networks as well as a lack of effective training that is responsive to women’s lived experiences. In the absence of adequate support and accessible legal protections, women manage violent and exploitative working conditions not through formal complaint mechanisms but by strategically ‘absorbing’ harm and reframing contractual disputes into personal, affective negotiations to ensure their income, safety, and security.

Within such workplaces where care work and intimate labour are performed, fictive kinship and the leveraging of intimacy and affective relationalities with employers becomes a strategy that women use to negotiate their safety and security, especially in the absence of equitable and accessible legal protections.³³ By positioning themselves as ‘part of the family’, women workers attempt to transform an unequal labour relationship into a moral contract grounded in personal/familial obligation and care.³⁴ In the isolated setting of home-workplaces where reminders of contractual obligations and monetary remunerations can stir up uneasiness,³⁵ such strategic performances of familial kinship and leveraging intimacy can serve as a protective mechanism. It allows women to negotiate responsibilities, navigate workplace conflict, secure regular income, and mitigate the risk of physical, verbal, and sexual violence, and of the sudden loss of employment.

³³ *Ibid.*

³⁴ B S A Yeoh *et al.*, ‘Migrant domestic workers and the household division of intimate labour: Reconfiguring eldercare relations in Singapore’, *Gender, Place & Culture: A Journal of Feminist Geography*, vol. 30, issue 5, 2023, pp. 619–637, <https://doi.org/10.1080/0966369X.2021.1956435>.

³⁵ K Wee *et al.*, ‘Love’s labour’s cost? Gendered migration and intimate labour in Asia’, *Gender, Place & Culture: A Journal of Feminist Geography*, vol. 30, issue 5, 2023, pp. 609–618, <https://doi.org/10.1080/0966369X.2023.2179025>.

However, while invoking pseudo-familial ties can sometimes be a crucial survival mechanism, a closer interrogation of how fictive kinship and affective relationalities are deployed exposes the mechanism's fragility. It is often a one-way street where women are expected to give without being reciprocated, and this is especially evident when we look at employers' attitudes to workers. Empirical evidence of this fragility is highlighted in **Wilson and Sari's** article on the perceptions and attitudes of employers of women migrant domestic workers in Hong Kong. Drawing on survey data and semi-structured interviews, the authors demonstrate that even when employers construct or explain the employment dynamic through a familial rather than a contractual lens, these affective framings rarely translate into equitable labour practices. Instead, employers' expectations of familial reciprocity sit alongside racialised stereotypes, exclusionary beliefs, and controlling attitudes to position women as subordinate to their own needs. Importantly, the article illustrates the limitations of familial kinship and the leveraging of intimacy and affective relationalities for migrant women's safety when such kinship co-exists with unequal employment relationships and inequitable labour conditions.

Ajith's article similarly exposes how women caregivers are expected to treat elderly clients 'like their own parents' yet are not afforded the same degree of care or respect but instead subjected to caste- and class-based discrimination. Building on these exclusionary logics, the illusion of familial inclusion serves to obscure systemic oppression rather than grant genuine belonging. In this article, the author demonstrates how caregivers are compelled to perform deep emotional and intimate bodily labour under the banner of kinship, while their lower-caste, working-class, or religious backgrounds are simultaneously weaponised against them. Employers exploit these socio-economic vulnerabilities, delegating dirty or demanding tasks to workers under the naturalised assumption that such labour inherently belongs to marginalised women. Thus, the rhetoric of 'family' functions purely as a mechanism of labour discipline: it demands unconditional affection and deference from caregivers while actively denying them basic labour rights, economic security, and equal human dignity within the employers' homes.

In the absence of formal legal frameworks, the quality and sustainability of live-in employment depend heavily on these affective and relational dynamics. Women workers strategically mobilise intimacy, emotional labour, and situated agency to cultivate employers' goodwill, mitigate isolation, and negotiate essential conditions such as fair rest, mobility, or dignity. Thus, 'good' employment is co-constructed through everyday intimate interactions, proving that sustainable working conditions rely as much on relational alignment as on material terms like wages.

However, as articles in this Special Issue also exemplify, intimacy and affective relationality need to be understood beyond the lens of being tools to be used either for exploitation or for resistance and as a survival strategy. In some cases, relationality and intimacy are at the core of 'good' and sustainable employment

conditions,³⁶ i.e. fair wages, reasonable working hours, and sufficient rest, which speaks to the intimate and affective dimensions of this form of employment. For example, in **Lazzarino, Kofman, and Kapadia's** article, migrant domestic workers asked migration intermediaries to intervene in matters beyond traditional labour disputes, such as isolation and emotional pressures. Similarly, **Ajith's** study highlights how women caregivers actively strive to preserve their dignity within deeply restrictive placements, framing dignity through distinctly affective and relational dimensions. Rather than viewing their work solely through the lens of hardship or submission, caregivers leverage personal integrity, emotional resilience, and quiet boundary-setting to maintain a sense of self-respect. By centring dignity in their daily interactions, caregivers demonstrate that sustainable employment relies heavily on mutual respect and affective fulfilment alongside basic material conditions.

Collectively, these articles reveal the limitations of existing system responses that are not constructed or developed to recognise the violence and harms associated with the performance of care work and intimate labour, or even the nature of these forms of employment.³⁷ Yet, we also see how gendered moralities of love and filial piety are invoked to justify the absence of protection and obfuscate the exploitation experienced by women in care work and intimate labour. Rather than offering meaningful structural protections, state policies have routinely relied on gendered, and as we have seen from articles in this Special Issue, on racialised, caste, and class-based moralities to maintain the status quo.

These issues also feature in **Sonja Dolinsek's** review of Ella Parry-Davies' book *Intimate Inequalities: Performing Migrant Domestic Work* (2025). The review highlights the book's innovative performance-based methodology, which illuminates how Filipina migrant domestic workers in Lebanon and the UK navigate and represent the complex intimacies of their lives. By incorporating this contribution, this Special Issue extends its critical engagement with the methodological, creative, and spatial dimensions of studying migrant domestic labour.

Recognising the Intersectional Continuities of Violence in Migrant Women Care Workers' Lives

Research has pointed to the ways in which the persistent siloing of issues—for example, where labour exploitation, human trafficking, and violence against women are considered separate areas of law and policy—impedes genuine progress to women's safety, as for many women, these different forms of gendered

³⁶ Tan, *Gendered labour, everyday security and migration*, p. 157.

³⁷ Fudge, p. 2.

violence are interconnected and ongoing.³⁸ Subsequently, even when the focus of efforts and interventions has been on women and girls, depending on how the problem is categorised (e.g. women's poverty, violence against women, or labour exploitation), it falls under the remit of different agencies with a specific focus and understanding of the problem at hand.³⁹ This obfuscates any capacity to recognise and respond to the complexity and continuity of women's experiences of violence. It also has flow-on impacts for how to investigate, respond to, and seek to prevent these forms of violence occurring in the future. In our previous research, we have also demonstrated how such siloed response mechanisms and efforts mean that women, and women migrant workers specifically, can fall through system gaps.⁴⁰

The gendered, racialised and classed continuities of violence that migrant women experience as part of their everyday lives is articulated in several articles in this Special Issue. This is most clearly exemplified in the discussions and references around women's pathways into care labour. **Michalakea and Rousaki** note how economic necessity is a key determinant for women's decisions to become surrogates, with a proportion of women having had a prior employment relationship with intended parents (often as domestic workers). Yet, the Greek law has not substantively or meaningfully engaged with these pre-existing structural and relational inequalities and instead frames surrogacy through an altruistic model and moral language of gift or sacrifice.

Jebin and Maher evidence how employers were able to weaponise women migrant domestic workers' economic dependency to repeatedly perpetrate physical and sexual violence with impunity. Arguing that economic insecurity serves as the primary driver of harm, underpinning and compounding physical and psychological violence, their article maps how Bangladeshi women domestic workers in Saudi Arabia endured ongoing exploitation in the hope of achieving economic security. Further, women's economic (in)security, which is interwoven in their pre-migration familial circumstances, effectively creates a structural confinement that trapped them in situations of violence and exploitation. These intertwining dynamics are not adequately accounted for or recognised in regulatory policies and frameworks where the lens of 'altruism' or 'independent migration' obscures the gendered dynamic that leads to and constrains women's choices and decision-making processes.

³⁸ M Segrave and S J Tan, 'Woman, migrant or worker? Human trafficking, violence against women and women's safety in ASEAN', *Journal of Gender-Based Violence*, vol. 9, issue 2, 2025, pp. 252–272, <https://doi.org/10.1332/23986808Y2024D000000062>.

³⁹ *Ibid.*

⁴⁰ Segrave and Vasil.

Likewise, for women in **Ajith's** article, financial precarity, debts and domestic violence characterised their employment pathways into live-in eldercare. The article further draws attention to how caste-based discrimination contributed to women being treated with suspicion, or simply rejected from employers' homes. The article illustrates how such attitudes intersect with social impressions that women from lower castes were better suited to perform intimate, bodily, and care labour, especially 'dirty' work. The implications of racialised discrimination and nationality-based assumptions of women's obedience and bargaining power are also accounted for in **Wilson and Sari's** analysis of employers' attitudes. Their article shows how such attitudes can contribute to the normalisation of exploitation and lower social condemnation of exploitative behaviours.

In many ways, the articles in this Special Issue broaden the focus of labour exploitation and human trafficking literature. They also reflect the pertinence of key arguments from feminist criminological scholarship wherein policy and system responses, however informed, have remained wedded to 'incident-based' understandings of violence rather than focused on the processes generating such violence.⁴¹ The ineffectuality and violence of such a siloed approach is well exposed in **Aiman's** article, which details how women migrant domestic workers fall through gaps and are abandoned in moments of conflict and crisis, exposing a protection hierarchy that is based on citizenship, race, and geopolitical value.

The articles in this Special Issue as well as other research carried out by us and other feminist scholars make a clear case for more comprehensive recognition and consideration of women's safety and the need to understand their experiences of violence beyond the blinkered lens of current legal and policy response systems.

Conclusion

The research presented in this Special Issue contributes to a growing conversation on the need for an integrated approach to understand and respond to the multidimensional nature of violence that impacts the lives of women care workers. Critically, this research sits at the intersection of where policy-makers and practitioners are often comfortable, with clear demarcations of 'problems' and 'responses'. Yet, it is sufficiently clear from the overwhelming research and evidence that there is a need to push our thinking beyond these silos. The exercise to challenge the dominant conceptualisations and understanding beyond these dimensions is not simply an exercise in theoretical or conceptual folly and novelty.

⁴¹ S Walklate, 'Life is complicated: Journeys, ghosts, liminality and policy responses to violence against women', *Criminology & Criminal Justice*, vol. 26, issue 4, 2026, pp. 1037–1052, <https://doi.org/10.1177/17488958251352854>.

Women's lived experiences of gendered violence and labour exploitation intersect with the gendered frameworks of care and intimacy that extend beyond individual homes and workplaces and across national borders. They are collective and entangled. There is a violence in efforts to disentangle these realities that are experienced as interrelated and enabling each other. Migration systems built on suspicion as well as gendered, classed, and racialised hierarchies impact how protection and support are accessed or enabled, which also interacts with labour systems that recognise some but not all the labour that care work involves. In particular, the most intimate and gendered forms of care that intersect with the everyday violence women experience at work, in public, and in the private sphere. Violence and exploitation are compounded and compounding, and they are enabled and enacted by many systems. In the context of care work and intimate labour, we can also clearly see how these structural gaps are often used and exploited by employers with impunity. This Special Issue seeks to contribute to a better understanding of these matters in order to push us further in asking how we can begin to reshape our conversations and examinations of gendered violence in all its settings.

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Thematic Articles:
Care Work, Inmate Labour,
Migration, and Exploitation

Bangladeshi Women Domestic Workers' Experiences of Intimate Labour in Saudi Arabia

Lubna Jebin and JaneMaree Maher

Abstract

Drawing on the theoretical lens of intimate labour, this paper analyses how economic security is entangled with Bangladeshi women's paid domestic work in Saudi Arabia, where women's bodies become contested sites of labour and gendered violence. We examine the negotiation of gendered expectations, relational dynamics, and power imbalances within Saudi Arabian home workplaces based on in-depth interviews with 18 returnee Bangladeshi women migrant domestic workers. Their stories reveal that employer-sponsored domestic work inherently produces systemic risks, severely constraining women's capacity for actively challenging harmful work practices. We argue that economic violence constitutes the most significant form of violation experienced by these women, sustaining other forms of violence. In response to this spectrum of violence, women employ everyday acts of resistance manifested through conscious endurance, affective distance, and non-confrontational tactics to ensure their economic goals of migration. An intimate labour lens highlights that these strategies are far more than coping mechanisms—they represent a critical terrain of resistance where women strategically manage their home workplace and its relational dynamics to deal with violence in the absence of formal institutional protection.

Keywords: intimate labour, paid domestic work, gendered violence, feminist migration policy

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Introduction

In the context of globalisation and neoliberalism, many countries from the Global North have experienced an increasing demand for paid care and domestic work, with labour predominantly sourced from women from the Global South.¹ However, the global trend of gendering paid care and domestic work is simultaneously connected to assumptions about women's unpaid domestic work being low-skilled and unproductive. Unpaid care and domestic work is generally defined as 'women's work', and due to women's traditional gender roles as mothers, wives, and daughters, their labour is seen as undeserving of any monetary compensation. Thus, in their unpaid care and domestic work, women experience devaluation and diminishment.² Because of the low social and economic value attached to unpaid care and domestic work, paid domestic workers are often recruited from economically and socially disadvantaged communities. This pattern is also prevalent in the global labour migration regime where the physical labours of women from less wealthy countries are transferred to the private homes in more developed countries. This migratory flow is simultaneously influenced by gendered structural factors in the Global South, such as women's economic insecurity, lack of employment and well-paid work, and the gender wage gap in local economies.³ Reports by the International Labour Organization (ILO) confirm that across regions, domestic workers are migrating under temporary migration schemes to work in private homes. In most cases, they are not entitled to full access to legal employment protections and basic human rights in the receiving countries.⁴ Furthermore, while sending countries offer some official support to protect their migrant workers abroad, these measures are mostly ineffective in practice.⁵ As a consequence, women migrant domestic workers'

¹ R Cox, 'Gendered Work and Migration Regimes', in R A Sollund (ed.), *Transnational Migration, Gender and Rights*, Emerald Group Publishing Limited, Bingley, 2012.

² H Lutz, 'Care Migration: The Connectivity between Care Chains, Care Circulation and Transnational Social Inequality', *Current Sociology*, vol. 66, issue 4, 2018, pp. 577–589, <https://doi.org/10.1177/0011392118765213>.

³ M Lansky *et al.* (eds.), *Women, Gender and Work, Volume 2: Social Choices and Inequalities*, International Labour Office, Geneva, 2017.

⁴ M Galotti, *Migrant Domestic Workers Across the World: Global and Regional Estimates*, International Labour Office, Geneva, 2016; L Addati *et al.*, *Care Work and Care Jobs for the Future of Decent Work*, International Labour Office, Geneva, 2018; A King-Dejardin, *The Social Construction of Migrant Care Work: At the Intersection of Care, Migration and Gender*, International Labour Office, Geneva, 2019, p. 35.

⁵ J Wu and P Kilby, 'The Precarity of Gender, Migration, and Locations: Case Studies from Bangladesh and Nepal', *Development in Practice*, vol. 33, issue 2, 2023, pp. 145–155, <https://doi.org/10.1080/09614524.2022.2057441>.

employment in private homes can lead to violence and insecurities.⁶ This situation is even more complex for live-in domestic workers (i.e. workers who live in the employers' houses where they perform the work) due to their invisibility in private homes and legal dependency on their employers.⁷ Since paid domestic work is and will remain an important source of women's employment, it is necessary to investigate and understand the experiences of women migrant domestic workers in home workplaces.⁸

In line with these global trends, Bangladeshi women are migrating overseas for paid domestic work and experiencing the same forms of violence in navigating their employment journey. The primary destination for Bangladeshi women migrant domestic workers has been Saudi Arabia. There is no official database on women domestic workers' experiences in the Saudi Arabian paid domestic labour sector, but according to one Bangladesh-based organisation, approximately 8,500 female domestic workers have returned home in the last five years due to physical and sexual abuse or irregularities in, or non-payment of, wages.⁹ Furthermore, according to numerous national and international media reports, Bangladeshi women migrant domestic workers in Saudi Arabia experience physical and sexual abuse, rape, starvation, beating, as well as suicide and suicide attempts, and many have died.¹⁰

While a significant body of migration scholarship has examined the violence experienced by paid domestic workers, conventional frameworks often overlook the intimacy and intimate dynamics and the resulting violence within the home workplaces. This paper addresses this gap by employing an intimate labour lens that defines paid domestic work as a complex social and emotional exchange requiring the intersection of personal and bodily boundaries.¹¹ This lens reveals how 'intimacy' and the 'intimate' nature of the domestic sphere facilitate unique

⁶ ILO, 'Migrant Domestic Workers', International Labour Organization, n.d., retrieved 20 July 2026, <https://www.ilo.org/topics-and-sectors/domestic-workers/migrant-domestic-workers>.

⁷ B Hobson, Z Hellgren, and I Serrano, 'Migrants, Markets and Domestic Work: Do Institutional Contexts Matter in the Personal Household Service Sector?', *Journal of European Social Policy*, vol. 28, issue 4, 2018, pp. 386–401, <https://doi.org/10.1177/0958928717753578>; R S Parreñas and E Boris, *Intimate Labors: Cultures, Technologies, and the Politics of Care*, Stanford University Press, Stanford, 2010.

⁸ King-Dejardin.

⁹ F Nawaz and T A Tonny, 'Reintegration Challenges of Migrants in Bangladesh: A Study on Forced Returnee Women Migrants from Saudi Arabia', *Journal of Humanities and Social Sciences Research*, vol. 1, no. 1, 2019, pp. 49–58, <https://doi.org/10.37534/bpjhssr.2019.v1.n1.id1000.p49>.

¹⁰ *Ibid.*

¹¹ Parreñas and Boris.

forms of structural and affective violence. Thus, this approach uncovers the mechanisms of bodily violation that traditional labour and migration frameworks frequently obscure.

The paper examines how economic security is at the centre of Bangladeshi women's paid domestic labour and how their search for such security means their bodies are located as key site of gendered conflict/struggle. Applying the intimate labour lens to the narratives of 18 returnee workers, the paper interrogates the diverse practices used by employers to surveil and control women's bodies.¹² We explore how the private setting of Saudi Arabian paid domestic work shapes Bangladeshi women's experiences of violence and dictates the specific, often subtle, ways in which they negotiate power and respond to disempowerment. As their stories highlight, women's experiences of physical security are routinely compromised in the home dynamics of domestic work, as they endure violence and control in pursuit of economic security.

A central contribution of this paper is the exploration of Bangladeshi women's negotiation practices within a highly constrained home workplace. While their accounts reveal occasional micro-strategies of resistance, such as the use of silence or pleading to avoid violence, women's dominant approach was the endurance of inflicted harm, which this paper conceptualises as 'absorption': a deliberate, albeit constrained, form of negotiation. By tracing these everyday practices, this analysis advances feminist migration scholarship, demonstrating how women exercise agency through both strategic resistance and the absorption of harm to secure their economic goals.¹³ In the next section, we examine the intersection of paid domestic work, intimate labour, and gendered violence, drawing on feminist analyses to show how everyday forms of violence are obscured within the expectations of paid domestic work and how women negotiate. Next, we outline the methodological approach, followed by the study's findings. In the final section, we offer concluding reflections.

Paid Domestic Work, Intimate Labour, and Gendered Violence

Mainstream migration scholarship and traditional labour frameworks have historically operated within a bifurcated logic that separates the 'home' from the 'workplace' and 'productive' from 'reproductive' labour.¹⁴ This separation is

¹² E Boris and R S Parreñas, 'Intimate Labors, Introduction', in C R McCann, E Ergun, and S-k Kim, *Feminist Theory Reader: Local and Global Perspectives (5th Edition)*, Routledge, New York, 2020.

¹³ R S Parreñas, *Unfree: Migrant Domestic Work in Arab States*, Stanford University Press, Stanford, 2021.

¹⁴ Parreñas and Boris.

not merely a conceptual oversight, it is a structural omission that fails to capture the gendered realities of risk, harm, and negotiation inherent to live-in domestic work. By considering the home as a private sphere exempt from public labour standards, traditional labour frameworks render many aspects of the home workplace invisible to the law and fail to categorise forms of harm that transcend direct physical assault or standard contractual violations. Feminist migration scholarship addresses this invisibility by integrating the concepts of ‘intimacy’ and ‘labour’—a conceptual shift that dismantles the artificial separation of home and work.¹⁵ This paper builds upon this feminist migration paradigm by analysing how these blurred boundaries between home and workplace operate within highly restrictive labour migration regimes. Applying the intimate labour framework specifically to the experiences of Bangladeshi women migrant domestic workers in Saudi Arabia allows us to extend these existing debates. Through this lens, we demonstrate how intimate, bodily, and domestic activities are redefined as spaces of economic production and structural exploitation.

Feminist scholarship conceptualises ‘intimate labour’ as work that relies on bodily labour, emotional engagement, and personal interactions within private homes.¹⁶ Domestic work, caregiving, nursing, and similar occupations fall within this category because they require forms of labour that societies often associate with ‘femininity’.¹⁷ When women perform this labour, it is frequently treated as ‘natural’ rather than being recognised as skilled work. This naturalisation serves to obscure the skills and emotional labour involved, while simultaneously justifying its lower social and economic value. Accordingly, domestic work is positioned outside mainstream labour analysis, which prioritises formal, public employment.¹⁸ Feminist theorists argue that this marginalisation is part of a wider process in which gendered domestic work becomes invisible, undervalued, and excluded from state support and labour protections.¹⁹ Building on this, understanding domestic work as intimate labour provides a framework for analysing how these very dynamics of gendered power shape women’s experiences of violence and negotiation. The relational nature of paid domestic work, such as proximity, care,

¹⁵ P Hetherington and J Laite, ‘Editorial Note: Special Issue: Migration, Sex, and Intimate Labor’, *Journal of Women’s History*, vol. 33, issue 4, 2021, pp. 7–39, <https://doi.org/10.1353/jowh.2021.0043>.

¹⁶ Parreñas and Boris.

¹⁷ R Cox, ‘Gender, Work, Non-Work and the Invisible Migrant: Au Pairs in Contemporary Britain’, *Palgrave Communications*, vol. 4, no. 1, 2018, pp. 121–124, <https://doi.org/10.1057/s41599-018-0174-9>.

¹⁸ B Anderson, *Doing the Dirty Work? The Global Politics of Domestic Labour*, Palgrave Macmillan, London, 2000.

¹⁹ M Jokela, ‘The Role of Domestic Employment Policies in Shaping Precarious Work’, *Social Policy & Administration*, vol. 51, 2017, pp. 286–307, <https://doi.org/10.1111/spol.12288>.

and responsiveness, often produces expectations of ‘obedience’, continuous bodily presence, and uninterrupted provision of care from women domestic workers. These affective expectations blur the boundary between employment and kinship, frequently purporting to consider women workers as ‘like family’ while still subordinating them within the household’s hierarchy.²⁰ The discourse of familial closeness appears benign, yet it often serves as a strategy through which employers secure women workers’ bodily compliance and expanded responsibilities, all without monetary compensation.²¹ It is within these blurred boundaries that feminist scholars locate the intersection of intimate labour and gendered violence. Rather than focusing on isolated events, feminist analysis conceptualises women domestic workers’ experiences of violence as embedded in structural, affective, and relational dynamics within the home workplace’s hierarchy.²²

In the case of Bangladeshi women migrant domestic workers, the structural vulnerability is initiated long before their arrival through a domestic recruitment channel dominated by local brokers and unregulated agencies. These intermediaries often serve as women’s sole contact point and source of information.²³ Coupled with a lack of pre-departure training, this absolute reliance ensures that many women enter the host country facing significant language barriers and limited access to support services. Upon arrival in Saudi Arabia, these pre-existing vulnerabilities are institutionalised by the broader legal structures of migration in the country, most notably the sponsorship (*kafala*) system. This legal framework transforms the domestic workplace into a site of absolute dependency by binding a worker’s legal residency and right to work to a single employer.²⁴ Under the *kafala* system, the employer holds significant power over the worker’s mobility, often manifesting in the confiscation of passports and the denial of exit permits. This system operates as a form of structural violence: it effectively confines the worker within the private sphere of home, rendering them invisible to formal

²⁰ M T N Nguyen, ‘Fictitious Kinship: Intimacy, Relatedness and Boundaries in the Life of Hanoi’s Migrant Domestic Workers’, *The Cambridge Journal of Anthropology*, vol. 32, issue 2, 2014, pp. 81–96, <https://doi.org/10.3167/ca.2014.320208>.

²¹ S J Tan, ‘When the Home Is Also the Workplace: Women Migrant Domestic Workers’ Experiences with the “Live-in” Policy in Singapore and Hong Kong’, *Anti-Trafficking Review*, issue 20, 2023, pp. 75–91, <https://doi.org/10.14197/atr.201223205>.

²² Parreñas and Boris.

²³ A Azad, ‘Recruitment of Migrant Workers in Bangladesh: Elements of Human Trafficking for Labor Exploitation’, *Journal of Human Trafficking*, vol. 5, issue 2, 2019, pp. 130–150, <https://doi.org/10.1080/23322705.2017.1422091>.

²⁴ M T Chowdhury and M S Kaiser, ‘Forced Return of Female Migrant Workers from the Gulf Countries to Their Countries of Origin: Contemporary Trends, Causes, and Consequences’, in R Baikady *et al.* (eds.), *The Palgrave Handbook of Global Social Problems*, Palgrave Macmillan, Cham, 2023, pp. 1–22, https://doi.org/10.1007/978-3-030-68127-2_323-1.

labour protections. By institutionalising legal dependency, the *kafala* system ensures that the employer's intimate work expectations are facilitated by the threat of deportation or criminalisation, effectively weaponising the structural isolation inherent in live-in domestic work. This structural confinement falls most heavily on women from economically marginalised countries like Bangladesh, who migrate for live-in domestic labour to fulfil urgent financial obligations to their families. These women operate within an intersection of class and gendered expectations that heightens their dependence on the employer's home. Furthermore, the privatised nature of Saudi homes renders the women virtually inaccessible to consular services and host-country labour supports.²⁵

This spatial confinement is further reinforced by gendered restrictions on movement, where women workers are often prohibited from leaving the house unaccompanied. To ensure women's compliance and minimise the possibility of external support, employers frequently confiscate mobile phones, cutting off the worker's last remaining link to her social network or family. Thus, Bangladeshi women migrant domestic workers' pursuit of economic security is shaped by an extreme degree of vulnerability in Saudi homes. The women enter these homes with non-existent social networks, intensifying their dependence on the employer for basic necessities such as food, housing, and information. This intersection of class, nationality, and gender produces a specific embodied vulnerability, where the women's survival is predicated on their ability to navigate the intimate and physical demands of the home workplace while subjected to total dependency on their employers.

Rather than focusing on isolated events, feminist analysis of intimate labour conceptualises violence as an experience rooted in structural, economic, and relational dynamics of home workplaces. Accordingly, this paper aligns with the ILO's comprehensive framework on violence in the world of work, utilising its clear classification of physical, sexual, and economic harms.²⁶ Grounding our typology in this institutional definition allows us to demonstrate how the spatial isolation of the home workplace reconfigures these categories, turning structural failure into a mechanism for reinforcing everyday violation of women's bodies. It is important to mention that this specific typology emerged organically from women's stories, reflecting how their lived experiences naturally map onto, yet expose the limits of, institutional definitions of work-related violence. In this light, the intimate labour lens allows us to understand how threats to food security,

²⁵ R Silvey, 'Transnational Domestication: State Power and Indonesian Migrant Women in Saudi Arabia', *Political Geography*, vol. 23, issue 3, 2004, pp. 245–264, <https://doi.org/10.1016/j.polgeo.2003.12.015>.

²⁶ R Zimmer, 'The Elimination of Violence and Harassment in the World of Work: ILO Convention No. 190', in M Moore, C Scherrer, and M van der Linden, *The Elgar Companion to Decent Work and the Sustainable Development Goals*, Edward Elgar Publishing, Cheltenham, 2025, pp. 336–345.

restricted living conditions, and economic exploitation operate as everyday tools of discipline that manifest as distinct economic and physical harms.

Yet, within this system of coercion, women are not merely passive victims. In the total absence of effective institutional support, women migrant domestic workers navigate their workplaces through what Parreñas identifies as everyday forms of resistance.²⁷ These micro-negotiations and subtle acts of defiance allow workers to reclaim a degree of agency within a system designed to ensure their total dependency on the employers. In this context, resistance rarely takes the form of formal legal complaints, which are often inaccessible to the women. Instead, it manifests through micro-strategies, such as the refusal of food or the temporary withdrawal of labour, which serve as critical, embodied forms of negotiation within the unregulated space of the home workplace. Building on these insights, this paper extends the feminist analysis of paid domestic work as intimate labour by investigating how these everyday relational and embodied expectations shape the specific experiences of Bangladeshi women in Saudi Arabian home workplaces. By centring their narratives, it moves beyond identifying broad structural vulnerabilities to analyse how mutually reinforcing forms of insecurity—across physical, sexual, and economic domains—are produced through employers' intimate expectations and contested through women's persistent, albeit constrained, agency.

Method

Research Design

This research was conducted between September 2021 and August 2022 and primarily focused on the experiences of returnee female migrant domestic workers in Bangladesh. Grounded in feminist migration theory, the study adopted a qualitative design specifically intended to amplify the voices of marginalised women and listen to the narratives they were willing to share.²⁸ This framework was purposefully chosen to centre the 'situated knowledge' of the survivors of violence. Rather than considering violence as incidental, this study investigated how structural and economic conditions within Saudi Arabian households facilitate systematic violation of women's bodies. By focusing on returnees, the research aimed to uncover the power dynamics that define the migration experience for women from the Global South, shifting the analytical lens from individual victimisation to institutional failure.

²⁷ R S Parreñas, *Servants of Globalization: Migration and Domestic Work (2nd Edition)*, Stanford University Press, Stanford, 2015.

²⁸ S Reinharz and L Davidman, *Feminist Methods in Social Research*, Oxford University Press, Oxford, 1992.

Population and Sampling Strategy

Participants were recruited through purposive, criterion-based sampling in collaboration with BRAC, a Bangladesh-based international development organisation. The selection criteria required participants to be returned female domestic workers who had worked in Saudi Arabia within the last five years and had experienced workplace exploitation or violence. A total of 18 participants were interviewed; their demographic information is presented below.

Table 1: Demographic Information of the Participants

Pseudonym	Age	Formal education	Marital status	Marital age	Number of children	Departure	Return
Sheuly	24	Grade-8	Married	19	1	2019	2020
Korobi	23	Grade-10	Divorced	11	1	2018	2019
Shapla	23	No Schooling	Married	12	2	2018	2018
Rojoni	45	No Schooling	Widowed	15	6	2018	2018
Jasmine	32	Grade-8	Divorced	13	2	2019	2020
Maloti	44	No schooling	Widowed	11	1	2019	2020
Monjori	21	Grade-8	Separated	14	1	2017	2019
Shurjomukhi	18	Grade-8	Unmarried	N/A	None	2019	2021
Golap	20	Grade-2	Married	20	None	2021	2021
Chapa	40	Grade-4	Married	14	2	2019	2019
Jui	23	Grade-7	Divorced	14/15	None	2020	2020
Aparajita	25	No schooling	Separated	12	3	2019	2021
Zinia	40	No schooling	Married	13	2	2019	2020
Joba	35	Grade-1	Widowed	11	4	2017	2020
Parul	40	No school	Married	22	2	2019	2019
Shaluk	30	Grade-2	Married	17	3	2019	2020
Hena	40	No schooling	Married	14/15	4	2019	2019
Shimul	19	Grade-5	Married	19	None	2019	2020

This sample size was determined sufficient by the narrative depth and conceptual richness of the women's stories. As qualitative researchers, our focus was on capturing the profound complexities of these lived experiences. This sample size allowed for an intimate, rigorous engagement with each narrative, ensuring that the structural nuances of violence and resistance were thoroughly explored. While this recruitment strategy introduces a potential selection bias—as BRAC primarily serves those experiencing significant hardship—this was a deliberate choice. Our objective was to provide a critical in-depth analysis of the systemic failures and institutional gaps experienced by the most 'vulnerable' returnees. By prioritising the intensity and richness of these narratives, our study investigated the specific power dynamics of the domestic workplace, moving beyond surface-level trends to understand the 'embodied' violence and negotiation forced upon women within the private sphere of the Saudi home.

Data Collection and Researcher's Positionality

Fieldwork was carried out via semi-structured phone interviews, which the participants identified as the most secure and convenient medium given the sensitivity of the topic and the geographical locations of the women. As the first author shares the participants' gender and nationality, an 'insider' status was initially assumed. However, we recognised that trust is cultivated through active listening rather than shared identity alone.²⁹ To minimise power imbalances, the researcher used colloquial Bangla and conducted three to four informal conversations before the formal interviews began. These sessions, which averaged two to three hours across multiple calls, allowed rapport to develop through shared discussions on motherhood and everyday life, creating a safe space for the women to navigate their trauma narratives.

Data Analysis

All interviews were recorded over the phone in Bangla, and then transcribed and translated into English by following a mix of both verbatim and creative translation. While verbatim ensures linguistic accuracy, creative translation captures the localised expression and contextual nuances.³⁰ For privacy and confidentiality of the participants, we chose pseudonyms which were shared with the women. To understand the women's narratives, we adopted reflexive thematic analysis, a process that considered coding as an active, interpretive

²⁹ J Carling, M B Erdal, and R Ezzati, 'Beyond the Insider–Outsider Divide in Migration Research', *Migration Studies*, vol. 2, issue 1, 2014, pp. 36–54, <https://doi.org/10.1093/migration/mnt022>.

³⁰ O Castro and E Ergun, 'Translation and Feminism', in J Evans and F Fernandez, *The Routledge Handbook of Translation and Politics*, Routledge, London, 2018, pp. 125–144.

process shaped by our specific positioning as feminist researchers.³¹ This method involved a constant, iterative practice between the participants' narratives and our theoretical framework of intimate labour and thus developed a typology of violence: lack of access to safe and sufficient food; physical violence; safe living arrangement and sexual violence; and economic violation. This approach allowed us to move beyond a broad definition of harm to examine how these specific forms of violence mutually reinforce one another within the home workplace. As the interviews were conducted over the phone, we adopted reflexive listening practice, and analysed vocal cues, silences, and hesitations as forms of 'embodied data'.³² This rigorous analytical process ensured that the resulting themes centre women's voices and perspectives while highlighting the patterns of violence and negotiation that described the intimate nature of their employment

Ethical Considerations and Trauma-Informed Care

University ethics approval was secured and the study adhered strictly to trauma-informed ethical protocols.³³ The researcher informed participants that they could pause, skip questions, or end the interview at any time. Furthermore, since participants were recruited through BRAC's Migration Programme, they were already part of an existing support system. The researcher also provided each woman with direct contact information for psychosocial counselling and legal aid, thereby establishing a clear referral mechanism for any emotional distress triggered by the interviews. The first author (who interviewed the women) developed some targeted mental and physical boundaries before and after each interview. This involved giving herself content warnings prior to emotionally demanding sessions and utilising grounding rituals, such as structured pauses and dedicated spatial transitions to process the mental stress of the fieldwork.

Limitations

While this study provides in-depth accounts of the lived experiences of returnee women, it is limited by the duration of the participants' stay in Saudi Arabia. The women had remained in the country for relatively short periods, typically three

³¹ G Terry *et al.*, 'Thematic Analysis', in C Willig and W S Rogers, *The SAGE Handbook of Qualitative Research in Psychology (2nd Edition)*, SAGE Publications, London, 2017, pp. 17–37.

³² H Abrahams, 'Listen to Me: A Reflection on Practice in Qualitative Interviewing', *Journal of Gender-Based Violence*, vol. 1, issue 2, 2017, pp. 253–259, <https://doi.org/10.1332/239868017X15090095938377>.

³³ K Ratajczak and S Clevenger, 'Applying Trauma-Informed Care Principles to Assist Gender-Based Violence Researchers and Students', *Journal of Gender-Based Violence*, vol. 10, issue 2, 2026, pp. 319–327, <https://doi.org/10.1332/23986808Y2025D000000111>.

months to two years. This timeframe likely shaped their experiences of isolation and vulnerability which is a limitation of our study.

Findings and Discussion

The women's stories revealed that physical security is deeply entangled with employers' expectations surrounding food practices, the threat or enactment of physical violence, and the regulation of women's living arrangements, including exposure to sexual violence. At the same time, women's economic security is undermined through practices such as wage retention, non-payment, and under-payment, illustrating how economic insecurity and embodied harms are mutually reinforcing in these contexts. Within these highly regulated environments, women often faced limited avenues to openly challenge their employers. As a result, the most prevalent response was a form of 'absorption', where workers endured these demands and harms. This was not an internalisation of their conditions, but a survival technique necessitated by the total absence of alternative supports.

Simultaneously, women deployed subtle micro-strategies to contest their total dependency and resist harmful practices. These acts, including the refusal of food, the temporary withdrawal of labour, and persistent demands for earned wages, functioned as expression of defiance in a context where formal avenues for redress were entirely absent. Such resistance represented a precarious yet critical negotiation for women's dignity and economic rights within the unregulated spaces of the Saudi home workplace.

Physical Violence

Food Practices as Tools of Bodily Control

Echoing findings in earlier scholarship, food practices constitute a primary strategy through which employers regulate workers' bodies within home workplace.³⁴ In our study, nine participants revealed how food intake and the imposition of the employer's food culture functioned as everyday tools of discipline and bodily control. One participant, Jasmine, described a state of extreme nutritional precariousness where she was forced to source waste food from the dustbin to sustain herself. Despite the physical intensity of her labour, which included washing clothes for a household of nine, the employer systematically denied her sufficient nourishment. Jasmine's decision to continue working 'at any cost' was not an acceptance of these conditions, but a survival technique necessitated by her

³⁴ E M de Casanova, 'Embodied Inequality: The Experience of Domestic Work in Urban Ecuador', *Gender & Society*, vol. 27, issue 4, 2013, pp. 561–585, <https://doi.org/10.1177/0891243213483895>.

role as the sole economic provider for her family in Bangladesh. For Jasmine, the ‘absorption’ of waste food was the only available means to secure the economic stability that drove her migration. Similarly, Maloti’s narrative illustrates how the deprivation of basic needs functions as a mechanism of employers’ control to enforce dependency. Maloti resorted to consuming raw dough—a desperate strategy of survival born from the systematic denial of food:

My employer did not give me enough food... I had to steal flour and eat it mixed with water. I did not even get the chance to make bread, because they might catch me red-handed. I asked for three meals, but they told me that I was not entitled to that, because I was their slave... I went there for income; what choice did I have other than stealing the flour?

By framing her as a ‘slave’, Maloti’s employer exploited the legal and structural isolation of the home workplace to justify absolute nutritional control. Maloti’s ‘stealing’ was, in fact, a necessary negotiation for her bodily survival in a space where no institutional support services were accessible. Similarly, Joba’s experience underscores how putting up with food deprivation, specifically the routine consumption of leftovers, worked as a tool of negotiated endurance. Her tolerance of these conditions was a forced adaptation to the absence of economic security in Bangladesh. For Joba, the physical absorption of hardship operated as a precarious bargaining tool. By enduring food insecurity, she was able to stay long enough to secure a year’s worth of wages that her employer had previously refused to pay:

The food problem was unbearable, but I continued working... eating leftovers every day. I did that just because I wanted to earn and save money for myself and for my sons. Though my employer was not paying my wages regularly, somehow, I managed to get an equivalent payment for one year because I sustained myself there.

While Jasmine, Maloti, and Joba discussed the subtle imposition of food practices, Korobi shared how her employer asserted a more explicit, racialised authority. She recalls: ‘They behaved as if I did not have the right to choose my own food... they considered me a poor woman from a poor country who should not have her own choice.’ Korobi’s experience illustrates how the employers use ‘food practice’ to assert a classed hierarchy, framing the worker’s employment as a ‘favour’ that demanded the subordination of her bodily autonomy. Korobi did not remain in these conditions because they were acceptable; rather, she was forced to absorb food insecurity as a structural necessity to secure her wages in a system designed for her absolute dependency on the employer. This imposition manifests not only in the denial of food choice but also in the enforcement of a different food culture that leaves women physically tired and hungry. Shimul shared how difficult it was to adapt to her employer’s food culture, a process that took her three months: ‘They used to eat bread, which was difficult for me to eat as we,

the Bangladeshi people, are used to have rice. To be honest, I did not get used to their food, I just swallowed to survive.’

From these narratives, it is clear that women were structurally compelled to absorb food insecurity as an ongoing practice of their employment. Because the employer-sponsored domestic work system binds women within the invisible and unregulated boundary of the private homes, everyday bodily needs like food and nutrition are stripped of legal protections. As a result, these basic rights are left entirely to the discretion of individual employers, forcing women into a highly constrained, embodied negotiation.

Physical Assault and Punishment

In home workplaces, domestic workers are expected to demonstrate unquestioned ‘obedience’ to their employers. Any act of perceived disobedience or active resistance is often met with punishment, where physical violence becomes a normalised and routine tool of discipline.³⁵ Employers deploy physical punishment not only to enforce ‘compliance’ but also to reinforce their authority and control over women’s bodies. However, rather than being passive recipients of this harm, the women in our study employed a range of covert tactics—from strategic compliance to the deliberate absorption of violence—to navigate the condition of dependency on the employers. Among the 18 participants, eight detailed the systematic use of physical assault and the survival techniques they employed in response. Korobi’s narrative exemplifies the use of strategic compliance, where she performed the role of the ‘obedient servant’ to prevent further escalation of bodily harm while simultaneously planning her escape. Her deliberate choice to perform ‘silence’ was a calculated survival manoeuvre:

I did not try to talk to my madam regarding the beating... If I raised the issue, I knew she would beat me even harder. They expected women to be obedient and compliant. So, I did my job silently while planning to find a new employer.

By adopting strategic compliance, Korobi instrumentalised her perceived obedience as a protective safeguard while covertly seeking alternative employment. This strategy was necessitated by the *kafala* system, which rendered leaving an employer’s home or employment legally and physically impossible. This power dynamic is further complicated by the legal requirement for a release certificate from the current employer. Because future employment depends

³⁵ R S Parreñas and R Silvey, ‘The Precarity of Migrant Domestic Work’, *South Atlantic Quarterly*, vol. 117, issue 2, 2018, pp. 430–438, <https://doi.org/10.1215/00382876-4374944>.

on this document, our participants explained that women strategically absorb the hardships of leaving a job to prevent their employer from withholding the necessary paperwork. When immediate departure was impossible, women were forced to absorb physical harm as a survival mechanism to secure the economic goals of their migration. Joba's narrative underscores this forced adaptation, where endurance of physical violence worked as a precarious bargaining tool to secure the income: 'It was difficult to tolerate physical punishment every day. But, I had no other choice to secure the wages.'

Legal and spatial restrictions in the Saudi domestic labour regime facilitate physical violence, leaving women with no choice but to endure abuse. Because Saudi Arabian homes are legally secluded from oversight, the domestic workplace functions as an unregulated space where violence is systematically deployed to suppress labour rights. Within this system, employers deliberately use physical harm as a disciplinary tool to silence women who insist on their contractual wages. Jui and Monjori's experiences reveal that absorption was sustained only until the violence escalated to a life-threatening level. When women demanded their wages, employers used physical punishment, such as throwing boiling water on them to silence their voices. This violence was compounded by a lack of state or institutional support within the host country, leaving the women with no choice but to escape even by risking their lives. Jasmine's experience exemplifies this; trapped by language barriers and physical locks, she finally jumped from a first-floor window as her only means of survival:

I did not even understand their language very well, where should I go for support, who could help me there? Then I called one of my friends who lived in Riyadh. She suggested I escape from that house and go to her place via taxi. I was so scared about this plan, what was more concerning that I did not have my passport either; I only had some money. One night, I escaped that house, I jumped from the first floor as all other exits were heavily locked.

Beyond the immediate threat of physical harm, the narratives of Champa and Maloti reveal that women developed specific navigational tactics to manage constant psychological pressure. Maloti observed that violence occurred even when she 'followed all the rules', highlighting a deliberate structural attempt to instil fear as a mechanism of control. In response, women adopted a tactic of affective distance, separating their internal emotional state from the physical abuse to maintain their capacity to continue working. This everyday form of negotiation is further illustrated by Korobi. In her experience, violence was utilised to secure compliance at the very onset of an instruction: 'Whenever they ordered me to do something, they either slapped or pushed me first and then they ordered. Probably they thought that I would do the work properly if they slapped me every time... I felt so much humiliation and shame... that I could not work properly.' This statement demonstrates that domestic work is not simply

structured through routine violence but is fundamentally constituted by it. This absolute power is rooted in the sponsorship system, which grants employers legal authority over the worker's physical presence and mobility. Within the intimate space of the home, this legal authority allows for a repetitive assertion of power, where the act of giving 'orders' is transformed into a routine of domination. Violence is not incidental here; rather, it is woven into the everyday practice of labour, normalising physical coercion as an inherent component of the work itself. Thus, physical violence and economic insecurity become mutually reinforcing: the constant threat of wage withholding or deportation compels women to treat bodily harm as a manageable condition of survival, effectively binding their economic security to the absorption of violence.

Unsafe Living Arrangement and Sexual Violence

Feminist analysis reveals that sexual violence is often inseparable from paid domestic work, largely due to the extreme proximity and blurred boundaries between labour and intimacy that define this sector.³⁶ Within the private sphere of the home, this proximity exposes women to heightened vulnerability, as employers frequently perceive sexual access as a structural entitlement of the labour contract. In this context, the intimate dynamics of domestic work serve to normalise sexual violence, reframing abuse as an inherent feature of the labour relationship. In our study, ten participants shared experiences of sexual violence, directly linking their vulnerability to the spatial manipulation of their living arrangements. These narratives highlight how sexual violence is facilitated by the living arrangement in the home workplace. Jasmine described how she was forced to cohabitate with the employer's pet birds. This provided an excuse for the male employer to enter her room late at night under the guise of 'feeding the birds'. Jasmine's response was to 'pretend' she did not understand his true intentions, putting on a performance of 'ignorance'. By acting as if the employer's presence were innocent, Jasmine avoided a direct confrontation that would have likely escalated the situation or risked her employment:

His body language and eye contacts clearly signalled his intentions... He thought that as my 'master', he had the right to have sex with me. I understood his intention clearly, but I was pretending that I did not understand anything. Because I wanted to continue the work without any unnecessary hassles.

Jasmine's narrative highlights how women are forced to strategically navigate employers' expectation of sexual access, transforming bodily protection into an everyday struggle for survival. Within this dynamic, the employer's power sanctions

³⁶ Hetherington and Laite.

them to treat the worker's body as a space under their intimate authority. By relying on the constant threat of deportation, the employers transform the domestic workplace into an active site of sexual violence. Women workers are aware that their legal right to remain in Saudi Arabia is tied to their employment, forcing them to negotiate this dependency while ensuring their physical safety. Jasmine's experience highlights the tactical nature of this endurance. She maintained her safety by constantly monitoring her employer's intentions and utilising the physical space of the home—locking her door and feigning sleep—to create a necessary, though fragile, barrier against sexual violence. Maloti's narrative further underscores how employers use spatial isolation as an 'opportunity' for sexual violence. By routinely entering her unlocked, secluded room, Maloti's employer's son exploited a living space that she noted was intentionally situated far from others to prevent her from seeking help. This isolation was compounded by her mobility and communication restrictions. Maloti's phone was seized immediately upon her arrival in Saudi Arabia, and she remained trapped within a house that was kept locked and under constant CCTV surveillance. Without any social network or outside contact in the country, she was left with no means of support:

All I could do was request a less painful style of rape to which they did not agree... They believed that since I went there as a domestic worker, I was always available for free sex... they thought that they could do it whatever style they liked.

Maloti's statement clearly highlights her unsafe condition where she had no other choice than requesting a 'less painful style' of sexual violence. In the absence of any formal safety mechanism, she was attempting to negotiate the terms of her survival within a site of absolute bodily violation. Similarly, Parul shared that her accommodation was outside of and far from the 'main house', which meant she was facing constant threats of sexual violence. She was in a situation where she was unable to withstand 'men's force' due to her isolated living arrangements:

It was so far from the main house that even if I screamed no one could hear... I used to work in the main house during the day and stay at that room alone at night. If any man went there and forced me, do you think I had the courage to stop them?

For Parul, the absorption of sexual violence was a coerced exchange where she had to prioritise economic security over her bodily safety due to the structural confinement of the *kafala* system. Parul discussed her deliberate consumption of sedative-laced meals, fully aware that her male employer would rape her once she became unconscious. As she noted, the primary reason for persisting in that violent setting was the necessity of maintaining a source of income, where sexual availability was implicitly considered as an inherent part of the paid labour arrangement.

In this section, women's stories highlight how the living arrangements within private homes were structured to expose them to the risk of sexual violence. While women acknowledged their experiences of sexual violence, they identified economic insecurity as the primary form of violence in domestic work and the fundamental reason they absorbed and sustained sexual violence.

Economic Violence

This section details employers' strategies of forcing women to work, applying various techniques of economic extraction. Employers' systemic practice of economic violence includes non-payment, underpayment, delayed payment, and partial payment of wages. Another common practice is retaining a portion of women's wages until the end of their employment, thus preventing them from discontinuing their work even in the face of unbearable physical and sexual violence discussed above. Among the 18 participants, 13 experienced wage retention, with more than half reporting under-payment. Women further revealed that wage retention was frequently enforced through a spectrum of overtly coercive tactics, such as verbal intimidation and mobility restriction. They were acutely aware that any overt resistance would likely trigger an escalation of violence. In response, they negotiated their survival through affective techniques, such as deliberate silence, leveraging emotional appeals or 'familial' proximity to invoke the employer's moral obligation. In some cases, women attempted to disrupt the isolation of the domestic sphere by involving local brokers to intervene, strategically seeking external pressure to address economic violence without triggering a direct confrontation with their employers.

One participant, Sheuly, shared that, in accordance with her contract, the employer was obligated to pay SAR 1,000 (USD 260), but they only paid SAR 800 (USD 213). She complained to her recruitment agency about the underpayment, but they took no action and refused to negotiate with the employer for fair wages. Sheuly's story reveals how employers escalate their level of control by using the broader migratory infrastructure, specifically through involving the recruitment agency. This strategy relies on the violent synergy between the private homes and the Saudi recruiters, which function as the local counterpart to the Bangladeshi agency. Instead of serving as a support system for women, the Saudi agency functioned as an external enforcer for the employers, prioritising institutional discipline and control over worker rights. In the absence of formal institutional support, Sheuly used 'affective negotiation' as a survivalist alternative for labour rights, where crying and emotional pleas function as conscious micro-strategies. By 'crying a lot' to the employer's wife, Sheuly strategically leveraged gendered proximity to shift the conflict from a contractual dispute to emotional negotiation. Thus, she attempted to invoke a sense of shared feminine empathy. Sheuly described this as a deliberate effort to transform the employer's wife from a position of authority to that of a potential negotiator:

I was crying that they did not give me a fair amount and I did not have anything I could do against them... I also asked for it from my employer's wife and cried a lot with her. She agreed that she would give me one thousand Riyals from next month.

Similarly, Monjori detailed how her employer coordinated with recruitment agencies to enforce her labour despite ongoing economic extraction. However, when discussing her eventual escape, Monjori identified wage retention, rather than other forms of violence, as the primary factor. She underscored her initial commitment to completing the two-year tenure, noting that she even compromised her nutritional needs to achieve that goal:

Their food culture was awful, but I was adamant that I would stick it out until the end of my contract. The payment was irregular. They used offensive language toward me if I asked for my pay. I stayed there for two years, but I only received three months' salary. I finally decided to run away. I could not stand the food, and I was not receiving the money. I therefore no longer found a reason to work there.

Monjori's narrative highlights how the devaluation of women's work at home is operationalised through irregular payment, transforming a labour agreement into a site of economic and bodily violence. This strategic wage retention serves to deny women's legal and social rights as workers. Such economic extraction acts as a mechanism of ownership, underpinned by physical and verbal violence to sustain control. Within this system, the necessity to secure withheld wages becomes a structural demand, leaving women with little choice but to endure the constant violation of their bodies. As a result, Monjori's strategies shifted from persistence to strategic withdrawal. Her initial micro-strategy was absorption where she attempted to complete the two-year contract to secure her child's future, indicating that she viewed her labour as a formal economic exchange even when her employers did not. However, after receiving only three months' salary for two years of work, she reclaimed her agency through the act of running away. By physically removing herself from the employer's home, Monjori actively challenged the employer's sense of ownership, signalling that once the promise of economic security is violated, the 'reason to work' and the justification for enduring bodily and nutritional insecurity effectively disappear. Korobi's experience further highlights how employers strategically use wage retention as a deliberate tactic to ensure the continuity of women's labour under abusive conditions:

They withheld my salary regularly, often keeping one or two months' pay to ensure I stayed and worked hard. Their plan succeeded, as I endured restrictions on contacting my family, preparing my own meals, and even physical abuse, while continuing to work in the hope of eventually receiving my wages.

By 'regularly' keeping one or two months' pay, the employer creates a state of ongoing economic dependency, where the worker's physical labour is effectively compelled by her own overdue earnings. Korobi's comment that 'their plan succeeded' reveals the efficacy of this strategy. The expectation of payment became the primary mechanism through which she was forced to endure severe restrictions on her mobility, communication, and nutritional autonomy. In this process, the withholding of wages does more than just extract physical labour. It acts as an instrument to silence the worker's resistance to physical violence. For Korobi, the home workplace became a site where her hope for economic security was effectively used against her, forcing to trade her bodily safety for the mere possibility of financial recovery.

As evidenced by these narratives, economic violence emerged as the most significant form of harm, as it functioned to mutually reinforce other dimensions of violence which were enacted and sustained through women's economic dependence. Within the precarious setting of paid domestic work, women endured systematic bodily violence under the fragile expectation of securing economic stability—a promise that, in most cases, was never achieved. This illustrates a profound structural confinement, where the pursuit of economic security becomes the very mechanism that binds the women to a site of ongoing physical insecurity.

Conclusion

Drawing on the intimate labour lens, this paper has shown how Bangladeshi women migrant domestic workers negotiate with violence in the private work setting of their employers' homes. By foregrounding the relational and embodied nature of paid domestic work, the women's stories demonstrate that their safety was severely constrained not only by the absence of state protection and labour rights but also by the intimate expectations and bodily demands embedded in home workplaces. Women's thoughts and actions were shaped through this intimate labour regime, where employers exercised control through food, accommodation, bodily surveillance, and physical discipline, and where women's negotiation was tied to their livelihoods and physical safety. Within these conditions, women's bodies often absorbed various forms of violence as a strategy for survival and economic security.

The women's narratives also reveal a form of constrained agency. In the absence of institutional support, their strategy shifted from overt resistance to strategic endurance. Specifically, women employed affective tactics, such as silence, emotional pleas, and compliance, to handle the affective work setting of the home. By leveraging gendered and familial proximity to appeal to an employer's sense of moral obligation, the women engaged in a non-confrontational form of bargaining. These manoeuvres allowed them to contest the devaluation of their labour and negotiate for their withheld wages without causing the immediate physical escalation that overt resistance might exacerbate.

By analysing these survival strategies through the intimate labour lens, this paper contributes to this special issue by addressing how a focus on intimate labour exposes the unique risks and harms cutting across the traditional public/private divide, while mapping the complex intersections of violence experienced by Bangladeshi women migrant domestic workers. It offers a feminist account that connects paid domestic labour, embodiment, and women's safety, highlighting how violence is produced and sustained through employers' intimate expectations and women's constrained choices. This lens captures the subtle, embodied, and relational dimensions of violence that conventional policy frameworks and labour protections often overlook, showing how harmful food practices, unsafe living arrangements, physical punishment, and economic exploitation operate together to deliberately place women's bodies at risk. Thus, our paper makes a significant contribution to feminist migration scholarship by highlighting the nuanced ways gendered violence is embedded in paid domestic work and demonstrating the importance of using the intimate labour lens to understand women's specific vulnerabilities and negotiations. Therefore, targeted policies must recognise that the home is an intimate work space likely to produce and sustain specific forms of violation. Effective protections must move beyond standard labour law to address the negotiation strategies women employ to navigate the physical and economic risks inherent in these isolated work settings. Future research should consider how longer durations of stay in the destination country might alter these dynamics. Workers who remain for extended periods may gain language skills, broader social networks, and a greater familiarity with the host country, potentially shifting their strategies for negotiation and resistance. Understanding the evolution of these 'intimate labour' experiences over time remains a vital area for further scholarly inquiry.

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Reproductive Labour, Commodification, and Gestational Surrogacy in Greece: A materialist feminist approach

Athena Michalakea and Anastasia Rousaki

Abstract

This paper examines surrogacy in Greece through a materialist and Marxist feminist framework grounded in Social Reproduction Theory, situating gestation within the political economy of reproductive labour under capitalism. While Greek law constructs surrogacy as an altruistic, non-commercial, and consensual act, such framing obscures the economic, affective, psychological and corporeal labour that gestation entails. Through an analysis of the Greek legislative context and an original reading of Greek surrogacy case law, the paper demonstrates how the legal framework operates as an ideological and repressive apparatus that depoliticises reproductive work and erases the surrogate's labour, privileging the reproductive aspirations of intended parents. Situating surrogacy within a continuum of reproductive work, we highlight how alienation, understood in the Marxist sense of estrangement from one's labour and its product, is produced materially and psychologically through moralised ideals of care, sacrifice, agency, and femininity. Making reproductive labour visible is the precondition for contesting its conditions of extraction, and a labour-centred reconceptualisation of surrogacy that repositions surrogates as reproductive workers opens space for collective contestation.

Keywords: surrogacy, reproductive labour, reproductive tourism, materialist feminism

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Introduction

Surrogacy broadly refers to arrangements in which a woman gestates and gives birth to a child on behalf of another individual or couple. Contemporary legal systems typically distinguish between traditional surrogacy, where the surrogate is genetically related to the child, and gestational surrogacy, where she carries an embryo to which she has no genetic link. A further distinction concerns so-called ‘altruistic’ and ‘commercial’ surrogacy.¹ While the former permits only limited compensation beyond pregnancy-related expenses, the latter allows direct payment for gestational labour. However, in neither configuration is gestational labour recognised as labour: in the altruistic model it is subsumed under the moral language of gift and sacrifice, while in the commercial model it is recast as a market transaction, the product of which is a child rather than the work of a woman.

The Marxist feminist tradition has long examined how capitalism’s organisation of work and value production depends on gendered divisions of labour that sustain, but rarely acknowledge, the reproductive and affective work undertaken by women. Activities such as pregnancy, childcare, and domestic maintenance—often idealised as natural expressions of care—constitute essential yet undervalued forms of labour that uphold both households and markets.² Reproductive labour, from this standpoint, is an inherently gendered and corporeal form of work performed within systems that both stigmatise and depend on women’s bodies and embodied labour. It becomes an economic survival strategy under conditions of precarity, while revealing unequal social reproduction, because the work of sustaining life remains disproportionately displaced onto women.³

It is from this Marxist feminist concern with the hidden labour that sustains capitalism that Social Reproduction Theory (SRT) offers an explicit framework for understanding reproductive work as structurally necessary, yet systematically devalued. SRT examines how capitalism depends not only on waged labour but also on the unpaid and underpaid reproductive work that sustains everyday life

¹ S Markens, *Surrogate Motherhood and the Politics of Reproduction*, University of California Press, Berkeley, 2007.

² S Federici, *Patriarchy of the Wage: Notes on Marx, Gender, and Feminism*, PM Press, Oakland, 2021; T Bhattacharya (ed.), *Social Reproduction Theory: Remapping Class, Recentring Oppression*, Pluto Press, London, 2017; A Rousaki, ‘Reproductive Labour, Abortion Bans, and Techno-Feudalism: A Call for a Marxist Feminist Approach in Psychology’, *Theory and Psychology*, vol. 36, issue 3, 2025, pp. 300–323, <https://doi.org/10.1177/09593543251397600>.

³ M Jana and P Kotiswaran, ‘Legal (Dis)Orders: A Feminist Assessment of India’s Assisted Reproductive and Surrogacy Law’, *Amicus Curiae*, Series 2, vol. 6, issue 2, 2025, pp. 300–323, <https://doi.org/10.14296/ac.v6i2.5752>.

and reproduces the labour force. Reproductive labour is therefore not peripheral to capitalist relations but rather constitutive of them, even as it is systematically excluded from the category of productive labour. In this paper, SRT provides a framework for analysing surrogacy as reproductive labour situated at the intersection of capitalism, patriarchy, global labour hierarchies, and neoliberal governance. Drawing also on Kotiswaran's theorisation of law and social reproduction,⁴ we examine legal regulation as actively shaping the terms through which reproductive labour is recognised, appropriated, or rendered invisible.⁵

Gestational surrogacy forms part of a continuum of reproductive labour, spanning unpaid domestic work, sex work, and other forms of intimate, feminised labour performed for the family or the market.⁶ This continuum demonstrates that surrogacy is not a morally exceptional or socially isolated practice, but part of a broader political economy of social reproduction, shaped by intersecting dynamics of gender, race, and class.⁷ Surrogacy is embedded within contemporary digital capitalism, where reproductive services are increasingly commodified and organised across borders through clinics, contracts, and digital platforms. As reproductive labour becomes more directly incorporated into market relations, the distinction between productive and reproductive labour is increasingly blurred. Within this framework, the Greek case offers a revealing example of how reproductive labour is legally regulated, morally legitimised, and materially obscured.⁸

⁴ P Kotiswaran, 'Wives and Whores: Revisiting Feminist Theorizing on Sex Work', *SSRN Electronic Journal*, 2006.

⁵ S Vertommen and C Barbagallo, 'The in/visible wombs of the market: The dialectics of waged and unwaged reproductive labour in the global surrogacy industry', *Review of International Political Economy*, vol. 29, issue 6, 2022, pp. 1945–1966, <https://doi.org/10.1080/09692290.2020.1866642>.

⁶ B Parry, 'Surrogate labour: Exceptional for whom?', *Economy and Society*, vol. 47, issue 2, 2018, pp. 214–233, <https://doi.org/10.1080/03085147.2018.1487180>.

⁷ L Fortunati, *The Arcana of Reproduction: Housewives, Prostitutes, Workers and Capital*, Verso, London, 2025; P Kotiswaran, 'Laws of Social Reproduction', *Annual Review of Law and Social Science*, vol. 19, issue 1, 2023, pp. 145–164, <https://doi.org/10.1146/annurev-lawsocsci-121922-051047>.

⁸ E Krithari, 'Making Babies, Pushing Boundaries: The Great Greek Fertility Market', *Balkan Insight*, 9 July 2021, <https://balkaninsight.com/2021/07/09/making-babies-pushing-boundaries-the-greek-fertility-market>.

Public and legal discourse around surrogacy has largely been dominated by bioethical debates centred on the moral status of reproductive technologies, shaped in part by Christian Orthodox morality,⁹ as reflected in the parliamentary discussions preceding Laws 3089/2002 and 3305/2005.¹⁰ The legal scholarship on surrogacy is largely organised around two competing yet complementary approaches, both of which bear the imprint of this bioethical framework. On one hand, a liberal legalist approach, grounded in the language of human rights, frames surrogacy as an extension of the ‘right to reproduction’ and of individual autonomy.¹¹ Within this paradigm, the emphasis falls on access, consent, and the regulatory balance between the parties, often obscuring the broader political economy of reproductive labour. On the other hand, there is a prevalent discursive construction of surrogacy through the lens of bodily objectification and female exploitation, viewing the gestational body as a site of patriarchal domination and commodification.¹² This view, articulated by certain strands of carceral feminism, increasingly informs supranational policy debates and reframes transactional intimacy as inherently exploitative.¹³ Similar concerns have now emerged regarding recent European Union legislative developments, such as the 2024 revision of the Anti-Trafficking Directive, which explicitly recognises the exploitation of surrogacy as a potential form of human trafficking.¹⁴

⁹ M Nikolaos and M Lavreotiki, ‘The Greek Orthodox Position on the Ethics of Assisted Reproduction’, *Reproductive BioMedicine Online*, vol. 17, supplement 3, 2008, pp. 25–33, [https://doi.org/10.1016/S1472-6483\(10\)60327-6](https://doi.org/10.1016/S1472-6483(10)60327-6); H Paxson, ‘Reproduction as Spiritual Kin Work: Orthodoxy, IVF, and the Moral Economy of Motherhood in Greece’, *Culture, Medicine and Psychiatry*, vol. 30, issue 4, 2006, pp. 481–505, <https://doi.org/10.1007/s11013-006-9028-9>.

¹⁰ A N Hatzis, ‘From Soft to Hard Paternalism and Back: The Regulation of Surrogate Motherhood in Greece’, *Portuguese Economic Journal*, vol. 8, issue 3, 2009, pp. 205–220, <https://doi.org/10.1007/s10258-009-0049-5>.

¹¹ K Fountedaki, ‘Preliminary Considerations on Law No. 5089/2024 (Equality in Civil Marriage)’, *Hellenic Review of European and Comparative Law*, 2024, <https://doi.org/10.26262/hrecl.v0i0.10824>; K Rokas, ‘Difficulties of Recognition in Greece of Parentage Links Created in Foreign Legal Orders Following Recourse to Techniques of Medically Assisted Reproduction’, *Culture and Research*, vol. 5, 2016, pp. 383–390, <https://doi.org/10.26262/culres.v5i0.4978>.

¹² M Maropoulou, ‘Greek surrogate motherhood from the French point of view: Critical enquiries and theoretical perspectives’, *Bioethica*, vol. 3, issue 2, 2017, pp. 59–73, <https://doi.org/10.12681/bioeth.19724>.

¹³ European Parliament, *Resolution on the regulation of prostitution in the EU: Its cross-border implications and impact on gender equality and women’s rights* (2022/2139(INI)), 14 September 2023, retrieved 27 July 2026, <https://eur-lex.europa.eu/eli/C/2024/1767/oj/eng>.

¹⁴ Eurojust, *Surrogacy and Human Trafficking*, Eurojust Publications, The Hague, 2024, <https://www.eurojust.europa.eu/publication/surrogacy-and-human-trafficking>.

Some feminist legal scholars have theorised these developments through the lens of governance feminism,¹⁵ highlighting how protection-oriented regulation may reinforce distinctions between ‘legitimate’ (familial and altruistic) and ‘illegitimate’ (market-based) forms of reproductive labour. However, explanations that reduce surrogacy to bodily objectification or female exploitation remain limited because they abstract gestation from the material conditions of capitalism. Similar limitations apply to bioethical framings, which reproduce the binary between individual consent and bodily exploitation while leaving the structural conditions of reproductive labour unexamined. Such accounts overlook how surrogacy emerges as a historically specific form of reproductive labour shaped by class relations, economic insecurity, precarity, and the broader organisation of social reproduction.

A materialist feminist approach moves beyond these dichotomies, recognising surrogacy as a form of *reproductive labour* intertwined with capitalist relations of production.¹⁶ Rather than reducing the phenomenon to moral or biological terms, this approach interrogates how economic structures, legal regimes, state apparatuses, and ideological narratives collectively shape women’s participation in reproductive markets, revealing the continuum between unpaid care, affective labour, and technologically mediated gestation. These dynamics become particularly visible in the Greek context, where the legal framework governing surrogacy plays a central role in shaping how reproductive labour is constructed, recognised, regulated, and, often, obscured.

To address this gap, the paper adopts an interdisciplinary socio-legal and psychological approach to analyse surrogacy in Greece through a materialist Marxist feminist lens.¹⁷ Situating surrogacy within broader debates on reproductive labour, commodification, and the political economy of social reproduction, it examines how legal and judicial frameworks simultaneously recognise and obscure reproductive labour. This analysis is informed by empirical research demonstrating how austerity, welfare retrenchment, and persistent gendered norms have reshaped social reproduction in Greece and deepened existing inequalities.¹⁸ Against this backdrop, surrogacy emerges as a particularly revealing

¹⁵ J Halley *et al.*, *Governance Feminism: An Introduction*, University of Minnesota Press, Minneapolis, 2018.

¹⁶ Jana and Kotiswaran.

¹⁷ E Nanopoulos and L Ullrich, ‘Toward a Marxist Feminist Approach to International Law’, in J Jarpa Dawuni *et al.* (eds.), *The Oxford Handbook of Women and International Law*, Oxford University Press, New York, 2025, pp. 535–552, <https://doi.org/10.1093/oxfordhb/9780197653647.013.0035>.

¹⁸ M Daskalaki, M Fotaki, and M Simosi, ‘The Gendered Impact of the Financial Crisis: Struggles over Social Reproduction in Greece’, *Environment and Planning A: Economy and Space*, vol. 53, issue 4, 2021, pp. 741–762, <https://doi.org/10.1177/0308518X20922857>.

site through which motherhood, kinship, and reproductive labour are negotiated, constructed, regulated, and contested.¹⁹ The paper further contributes to debates on care work and intimate labour by showing how legal and moral constructions of altruism, care, and family-making shape understandings of harm and exploitation across the public/private divide, highlighting how ostensibly altruistic frameworks can obscure inequalities experienced by migrant and economically precarious reproductive workers.

Methodology and Sources

This paper draws on two categories of primary legal material: Ravdas' empirical study of approximately 150 Greek court decisions on surrogacy issued between 2003 and 2015, and the authors' own analysis of 20 decisions issued between 2018 and 2023, retrieved from the ISOKRATES/DSA legal database and spanning first-instance courts, Courts of Appeal, and the Court of Cassation.²⁰ The case law analysis was conducted through a systematic socio-legal reading of each decision, attending to three dimensions: the legal criteria foregrounded by the court; the treatment of the surrogate as a legal subject; and the silences—what courts do not address, ask, or record. This approach draws on critical legal methodology, which treats judicial reasoning not merely as the application of rules but as a site of ideological production, revealing how law constructs, rather than simply reflects, social relations. The legal analysis is situated within a broader interdisciplinary framework integrating political economy and psychology. The former draws on materialist feminist and SRT to contextualise legal regulation within the structural conditions (austerity, labour precarity, and welfare retrenchment) that shape surrogates' participation in reproductive arrangements. The latter attends to the affective and subjective dimensions of gestational labour, examining how ideological constructions of care, sacrifice, and altruism organise the surrogate's experience as a subject.

Two limitations bear noting. First, because surrogacy proceedings fall under voluntary/non-contentious jurisdiction, the entire number of judgments issued annually is not publicly accessible; a comprehensive dataset would require special institutional access to individual court archives. The only available aggregate figure is that 81 children were born through surrogacy in Greece in 2022 and

¹⁹ J Tsiganou, *Κοινωνικές αναπαραστάσεις, πεποιθήσεις και στερεότυπα για την ενδο-οικογενειακή βία κατά των γυναικών στην Ελλάδα* [Social representations, beliefs and stereotypes on domestic violence against women in Greece], National Centre for Social Research, Athens, 2021.

²⁰ Access to Greek surrogacy-related case law is limited: the majority of relevant decisions are not publicly available and, in many instances, require special permission or institutional access through court archives. There is no comprehensive public database of such judgments.

51 in 2023.²¹ The decisions analysed here are therefore best understood as a representative rather than an exhaustive sample. This methodological choice carries an important limitation that is itself analytically significant. Voluntary/non-contentious proceedings do not generate a record of the surrogate's voice, socio-cultural or economic circumstances, or motivations. The empirical material available to researchers is therefore structurally shaped by the same ideological mechanisms this paper seeks to critique: the invisibilisation of reproductive labour and the limited recognition of the surrogate as a subject within the legal process.

Law, Ideology, and the Legal Regulation of Surrogacy

Greece permits altruistic gestational surrogacy under a specific legal regime that requires prior judicial authorisation. According to Article 1458 of the Greek Civil Code, as amended by Laws 3089/2002 and 3305/2005, surrogacy is allowed only when the intended mother is medically unable to gestate and the surrogate does not contribute her own genetic material.²² Legal parenthood is transferred to the intending mother through a court decision *before* conception, thereby avoiding the need for post-birth adoption or parental recognition procedures.²³ This model positions Greece as a unique jurisdiction in Europe where intent-based parenthood is legally secured via pre-birth judicial consent. It is noteworthy that the law prohibits any financial remuneration beyond compensation for 'reasonable expenses', reflecting a strong normative orientation toward non-commercialisation.²⁴ Significant legislative amendments were introduced through Law 5197/2025, which narrowed eligibility criteria. The revised law now requires both the intended/social parent(s) and the surrogate to reside or be legally

²¹ D de Groot, *Surrogacy: The Legal Situation in the EU*, EPRS Briefing No PE 769.508, European Parliamentary Research Service, European Parliament, February 2025.

²² K Rokas, 'National Regulation and Cross-Border Surrogacy in European Union Countries and Possible Solutions for Problematic Situations', in A Bonomi and G P Romano (eds.), *Yearbook of Private International Law Vol. XVI - 2014/2015*, Verlag Dr. Otto Schmidt, Köln, 2016, pp. 289–314, <https://doi.org/10.9785/012>.

²³ Rokas, 'Difficulties of Recognition in Greece'.

²⁴ Compensation is carefully delimited so as not to constitute commercialised payment. Specifically, compensation may cover: (a) medical expenses related to conception, gestation, childbirth, and postpartum care, and (b) any positive harm incurred due to absence from work, including loss of wages during this period. The total amount of covered costs and reimbursements is determined by the National Authority for Medically Assisted Reproduction.

domiciled in Greece,²⁵ and excludes single men and same-sex couples from accessing surrogacy arrangements.²⁶ Single women remain eligible, provided they meet the statutory criteria, and trans women may also access surrogacy where they have formally changed their legal gender.²⁷ While Greek law does not mandate a genetic connection between the intended mother and the child—permitting the use of donor eggs alongside gestational surrogacy—it categorically excludes traditional surrogacy, where the surrogate contributes her own genetic material.²⁸ In this sense, the law permits a partial decoupling of genetics and gestation while preserving the boundary against full substitution of the intended mother. It nonetheless continues to restrict access along heteronormative lines, reinforcing gendered assumptions about who may legitimately reproduce and under what conditions.

As in many other jurisdictions, legislative discourses tend to prioritise the rights of intended parents and the enforceability of contracts over the lived experiences and relational labour of gestational workers.²⁹ The legal emphasis on intention

²⁵ Law 5197/2025, Art. 46. See also: S Everingham, ‘Major Change to Greek Surrogacy Laws: What it Means for International Intended Parents’, *Growing Families*, 21 May 2025, <https://www.growingfamilies.org/blog/major-change-to-greek-surrogacy-laws-what-it-means-for-international-intended-parents>.

²⁶ M Oldenburger, ‘Greece: New Legal Situation for Surrogacy Since May 2025’, *Anwälte Schneider Stein & Partner*, 2025, <https://www.anwaelte-schneider-stein.de/en/ssp-news/greece-new-legal-situation-on-surrogacy-since-may-2025>.

²⁷ K Panagos, *Παρένθετα Μητρότητα: Ελληνικό νομικό καθεστώς και εγκληματολογικές προεκτάσεις* [*Surrogacy: The Greek Legal Framework and Criminological Dimensions*], Sakkoulas, Athens, 2023, p. 63.

²⁸ E Tountasaki, ‘Anthropological research on the technique of egg donation in Greece: Cultural conceptualizations, social practices, legislative provisions’, *Bioethica*, vol. 3, issue 2, 2017, pp. 26–38, <https://doi.org/10.12681/bioeth.19722>.

²⁹ This pattern has been documented across a range of jurisdictions permitting both altruistic and commercial surrogacy. For comparative analysis, see J M Scherpe, C Fenton-Glynn, and T Kaan (eds.), *Eastern and Western Perspectives on Surrogacy*, Intersentia, Cambridge, 2019, and C Fenton-Glynn, ‘Outsourcing Ethical Dilemmas: Regulating International Surrogacy Arrangements’, *Medical Law Review*, vol. 24, issue 1, 2016, pp. 59–75, <https://doi.org/10.1093/medlaw/fwv044>. On the specific erasure of surrogate labour within altruistic frameworks, see also S Banerjee and P Kotiswaran, ‘Divine Labours, Devalued Work: The Continuing Saga of India’s Surrogacy Regulation’, *Indian Law Review*, vol. 5, issue 1, 2021, pp. 85–105, <https://doi.org/10.1080/24730580.2020.1843317>. The present analysis nevertheless departs from purely doctrinal comparative frameworks that treat surrogacy regimes as technical legal variations, approaching legal difference instead through its ideological and material effects on kinship, dependency, and reproductive labour. See J Halley and K Rittich, ‘Critical Directions in Comparative Family Law: Genealogies and Contemporary Studies of Family Law Exceptionalism’, *American Journal of Comparative Law*, vol. 58, issue 4, 2010, pp. 753–775, <https://doi.org/10.5131/ajcl.2010.0001>.

and judicial approval is progressive, ultimately centring reproductive outcomes rather than the *labour* of reproduction. The prior judicial authorisation required under Article 1458 introduces a unique procedural mechanism through which the court must verify the surrogate's consent, her medical suitability, and the medical necessity of the intended mother's infertility.³⁰ The process involves the submission of medical certificates, psychosocial evaluations, and a detailed surrogacy agreement, which the court reviews before any embryo transfer may proceed. Furthermore, the court typically requires that the surrogate has already given birth to at least one child, a condition aiming to demonstrate her reproductive experience and presumed emotional preparedness for the arrangement.

Such a legal structure exemplifies what Althusser theorised as part of the broader network of Ideological State Apparatuses.³¹ This concept refers to institutions such as law, education, religion, and media that reproduce dominant social relations through ideology rather than direct force. Although juridical institutions are often linked to the Repressive State Apparatuses, Althusser emphasises that law also operates ideologically, shaping what subjects understand as 'just' and 'fair'. In this sense, the Greek legal framework masks the economic coercion and gendered labour relations that make surrogacy possible. Through law and medical discourse, the surrogate is interpellated as a moral subject who acts freely out of care and sacrifice, rather than as a worker embedded in unequal social relations.³²

³⁰ Altruistic surrogacy frameworks operate across several jurisdictions with distinct procedural and eligibility conditions. Within the EU, Cyprus permits altruistic gestational surrogacy under the Family Law Amendment 69(I)/2015, requiring prior family court approval before embryo transfer—a structure broadly comparable to the Greek model. In the United Kingdom, altruistic surrogacy is governed by the *Surrogacy Arrangements Act 1985* and the *Human Fertilisation and Embryology Act 2008*; crucially, however, the UK does not provide for pre-conception transfer of legal parenthood, requiring a post-birth parental order instead. This procedural distinction underscores the comparative distinctiveness of the Greek and Cypriot frameworks. In contrast, jurisdictions permitting commercial surrogacy—including certain US states and, until recently, Ukraine—render the economic dimensions of gestational labour contractually explicit, precisely because they cannot be ideologically subsumed under the language of altruism. See De Groot; A Brown, 'Surrogacy law reform in the UK: The ambiguous position of payments to the surrogate', *Child and Family Law Quarterly*, vol. 33, issue 2, 2021, pp. 95–114. At the same time, formally similar altruistic frameworks may nevertheless operate through materially distinct labour, migration, and household relations, cautioning against overly abstract comparative equivalences. See D Kennedy, 'Political Ideology and Comparative Law', in M Bussani and U Mattei (eds.), *The Cambridge Companion to Comparative Law*, Cambridge University Press, Cambridge, 2012, pp. 35–56.

³¹ L. Althusser, 'Ideology and Ideological State Apparatuses (Notes Toward an Investigation)', in L. Althusser (ed.), *Lenin and Philosophy and Other Essays*, Monthly Review Press, New York, 1971, pp. 127–186.

³² *Ibid.*, p. 174.

In the surrogacy context, it is the juridico-medical discourse that performs this hailing, constituting the gestational worker as a selfless maternal figure rather than as a worker with interests and claims of her own. From a materialist feminist perspective, this ideological framing both legitimises and depoliticises the commodification of reproductive labour, reproducing classed and gendered hierarchies under the guise of legal neutrality and moral virtue.

Surrogacy proceedings in Greece fall under voluntary/non-contentious jurisdiction (*ekousia dikaiodosia*), a procedural framework distinct from ordinary civil litigation. Unlike adversarial proceedings, in which a court adjudicates between competing parties, voluntary jurisdiction proceedings involve no opposing party: the court acts as a verifying authority, examining whether the applicant satisfies the statutory conditions for a judicially authorised arrangement. Rules of evidence are more flexible, and the court is not bound by the formal constraints of contentious procedure. The court's focus tends to fall on ensuring that the legal criteria are met—medical necessity, written agreement, residence conditions, age limits—and that the arrangement does not appear commercially motivated.

This pattern is confirmed and extended by our own analysis of 20 decisions issued between 2018 and 2023, spanning first-instance courts, Courts of Appeal, and the Court of Cassation. Surrogates are typically either Greek women—often married—or unmarried migrant women from Eastern Europe, particularly from Albania, Bulgaria, Georgia, Kazakhstan, Poland and Romania, who have resided in Greece for an extended period, and most have no kinship ties to the intended parents.³³ Ravdas' broader dataset further indicates that only 35% of surrogate mothers were Greek nationals, that 24% had a prior working relationship with the intended parents, and that many were employed in low-paid feminised labour—in several cases as domestic workers in the commissioning parents' households, placing them in a structurally dependent relationship with them.³⁴ Neither Ravdas' data nor the more recent decisions we reviewed indicate that courts engage with pre-existing power asymmetries, including whether consent given within an employment relationship can be meaningfully altruistic. Courts rarely engage with the surrogate's personal or socio-economic circumstances, instead foregrounding medical necessity and parental intent and treating the gestator primarily as a legal condition for the transfer of parenthood. In doing so, the surrogate is constructed as a neutral intermediary, obscuring the embodied, gestational, emotional, and relational labour involved.

³³ *Ibid.*

³⁴ E Rethymniotaki, 'Reproductive Technology and the Same-Gender Family: The Role of Family Law', *Culture and Research*, vol. 5, 2016, pp. 199–223, <https://doi.org/10.26262/culres.v5i0.4963>.

In Athens Court of First Instance, Decision No 465/2018, involving a Polish surrogate residing in Athens, the court confined its reasoning to the statutory requirements, making no reference to the surrogate's motivations, economic circumstances, or relationship with the intended mother. Similarly, in Ilia Court of First Instance, Decision No 15/2022—the most analytically detailed decision in the dataset with respect to jurisdictional questions—the court examined the applicant's residence in detail but remained silent on the circumstances of the surrogate, a young single mother whose socioeconomic situation was not considered.

The ideological function of the altruism framework is perhaps most clearly exposed by the appellate case law. In Athens Court of Appeal, Decision No 1245/2022, the court explicitly stated that altruistic motivation is not legally required, and that lawful compensation of up to EUR 10,000 does not constitute prohibited remuneration. Further, in Athens Court of Appeal, Decision No 972/2023, the court accepted the participation of a surrogate who had already carried a pregnancy for a different intended mother, ruling that the law sets no numerical limit on repeated surrogacy. This ruling *de facto* recognises an indirect professionalisation of surrogacy, undermining the altruism framework it purports to uphold. Altruism thus emerges as a legitimating narrative, a discursive virtue-wash applied to arrangements whose economic logic the law simultaneously permits and conceals. In Thessaloniki Court of First Instance, Decision No 60/2019, the surrogate's friendship with the intended mother was noted positively by the court as consistent with altruistic motivation, and no inquiry was made into the surrogate's economic circumstances or the relational pressures that may have shaped her decision. In Patras Court of First Instance, Decision No 557/2022, the court's entire analysis of the surrogate—a widowed Kazakhstani national, mother of three adult children—was confined to the evidentiary sufficiency of her residence permit. The case law examined here reveals a consistent pattern: the architecture of surrogacy regulation in Greece does not merely authorise gestational arrangements but actively produces a particular subject, one whose labour is rendered invisible precisely through the mechanisms designed to legitimate it.

Having outlined the legal and ideological scaffolding that authorises and constrains surrogacy, it is essential to contextualise these dynamics within the broader political economy. The following section, therefore, traces how the political economy, austerity, the absence of welfare provisions, and gendered divisions of labour condition the material circumstances under which surrogacy is negotiated and experienced.

The Political Economy of Surrogacy in Greece

Under neoliberal globalisation, the organisation of social reproduction has undergone profound restructuring, with direct consequences for women's labour and everyday life. As feminist economists have observed, the decline of welfare states, the ageing of populations, and the rise in women's labour market participation have replaced the older homemaker/breadwinner model with a precarious 'dual-earner' household.³⁵ In this new configuration, women are increasingly called upon to participate in paid employment while continuing to shoulder the bulk of unpaid domestic and affective work. The resulting strain—what feminist theorists describe as the *depletion of social reproduction*³⁶—reveals a constitutive tension within neoliberal capitalism: the system depends on women's reproductive labour while continually undermining the material conditions necessary to sustain it.

In the Greek context, these dynamics have been sharpened by austerity and the dismantling of social welfare since the 2010s. Cuts to public health and childcare services have pushed the burdens of care back into the household, while precarious employment and migration have generated new hierarchies of reproductive labour. Daskalaki *et al.* explore how the financial crisis and subsequent austerity measures reshaped the gendered organisation of social reproduction.³⁷ The crisis was not only an economic collapse but also a *crisis of reproduction*,³⁸ in which the capacity to sustain daily and generational life was severely undermined. Women absorbed much of the impact, taking on unpaid domestic and community labour to compensate for the withdrawal of state support and the erosion of welfare. These conditions intensified gendered inequalities, with women becoming the primary agents of family and community maintenance amid austerity, unemployment, wage cuts, and welfare retrenchment. At the same time, many women engaged in collective practices—social pharmacies, food cooperatives, and community kitchens—that operated as spaces of solidarity and resistance, offering alternative modes of care and reproduction outside capitalist

³⁵ S L Holloway and H Pimlott-Wilson, 'New Economy, Neoliberal State and Professionalised Parenting: Mothers' Labour Market Engagement and State Support for Social Reproduction in Class-Differentiated Britain', *Transactions of the Institute of British Geographers*, vol. 41, issue 4, 2016, pp. 376–388, <https://doi.org/10.1111/tran.12130>.

³⁶ S M Rai, 'Social Reproduction and Depletion', *Feminists@Law*, vol. 12, issue 2, 2023, <https://doi.org/10.22024/UniKent/03/fal.1221>; S M Rai, C Hoskyns, and D Thomas, 'Depletion: The Cost of Social Reproduction', *International Feminist Journal of Politics*, vol. 16, issue 1, 2014, pp. 86–105, <https://doi.org/10.1080/14616742.2013.789641>.

³⁷ Daskalaki, Fotaki, and Sotiropoulou.

³⁸ N Fraser, 'Contradictions of Capital and Care', *New Left Review*, vol. 100, Jul/Aug 2016, pp. 99–117, <https://doi.org/10.64590/nt2>.

exchange relations. Yet, as Daskalaki *et al.* note, such initiatives, while fostering collectivist ethics of care, also risked reproducing traditional gender hierarchies and moralised expectations of women's caregiving roles.³⁹ Migrant women—often from Eastern Europe or the Philippines—fill care and domestic roles that allow middle-class Greek women to remain in paid work, reproducing a racialised division of reproductive labour that mirrors global inequalities.⁴⁰

Within this broader setting, surrogacy represents a novel yet structurally consistent form of commodified reproductive labour. It operates at the intersection of neoliberal biopolitics and the expansion of markets into the intimate sphere. Feminist legal theory has argued that the law's exceptional treatment of the family rests on the assumption that intimate and reproductive relations are affective and altruistic, and therefore distinct from ordinary market relations. Yet, as Halley and Rittich argue, the ideological separation between family and market obscures the distributive functions performed within the household and masks the economic relations through which reproductive labour is organised,⁴¹ a logic exemplified by the Greek legal framework. The legislative choice to restrict surrogacy to altruistic arrangements was explicitly grounded in two rationales: that the mother-child relationship should not be mediated by financial gain, and that the prohibition of remuneration would safeguard against the exploitation of those involved. Under Article 13(4) of Law 3305/2005, permissible compensation is limited to pregnancy-related medical expenses, loss of earnings due to absence from work, and any positive harm incurred—subject to an overall ceiling of EUR 10,000 (EUR 15,000 in cases of multiple pregnancy). Yet, as Panagos observes, these amounts frequently exceed the annual working income of women who serve as surrogates in Greece, and substantially surpass the earnings of individuals from certain countries of origin, rendering the altruism framework not a safeguard against economic motivation but a legal fiction that conceals it.⁴² This is further evidenced by Panagos' finding that of 62 decisions issued by the Thessaloniki Court of First Instance in 2019, 42 applicants were foreign nationals—a pattern he identifies as indicative of Thessaloniki's emergence as a destination for reproductive tourism.⁴³ This 'selfless' framing thus conceals a stratified reproductive market in which economic necessity and geographic inequality structure participation, while the law maintains the appearance of non-commercialisation.

³⁹ *Ibid.*

⁴⁰ A L Blazier and R Janssens, 'Regulating the International Surrogacy Market: The Ethics of Commercial Surrogacy in the Netherlands and India', *Medicine, Health Care and Philosophy*, vol. 23, issue 4, 2020, pp. 621–630, <https://doi.org/10.1007/s11019-020-09976-x>.

⁴¹ Halley and Rittich.

⁴² Panagos, p. 84.

⁴³ *Ibid.*, p. 86.

From a materialist feminist standpoint, this legal architecture conceals how reproductive capacity becomes a site of capitalist value extraction. The surrogate's labour is central to the functioning of the assisted reproduction market but remains institutionally invisible. As Glass argued, surrogates experience a form of *alienation*, both bodily and emotional, as their reproductive activity is transformed into an object of exchange.⁴⁴ The ideological framing of surrogacy as an act of maternal generosity rather than work functions to 'naturalise' women's reproductive capacities, presenting gestation as a morally infused gift rather than as embodied, time-consuming, physically taxing, and relational labour. This moralisation legitimises the expectation that surrogates offer intense physical and emotional labour without economic recognition, reinforcing the invisibility of their contribution. Surrogates themselves often describe their participation as an economic survival strategy. Significantly, the work trajectories of many surrogates are situated within the informal and poorly regulated domain of care services, a 'grey zone' of labour where emotional commitment and physical effort are intertwined yet rarely recognised as productive work.⁴⁵

Moreover, the legal discourse surrounding surrogacy in Greece reflects the broader neoliberal regulation of social reproduction, where market logic infiltrates even the most intimate domains of life. While surrogacy is permitted only under court authorisation and framed as non-commercial, in practice it sustains a stratified market: affluent intended parents, often from abroad, rely on Greek or migrant women in precarious economic conditions. This reproduces global and racial hierarchies, privileging middle-class parenthood and the nuclear family, while marginalising the embodied labour that enables it.⁴⁶

While these socio-political and economic dynamics show the structural conditions of reproductive labour, they cannot be fully understood without attending to their psychological and affective dimensions. The following section explores how ideology and emotion interact to organise the surrogate's lived experience, revealing the mechanisms through which exploitation is legitimised and internalised.

⁴⁴ M Glass, 'Reproduction for Money: Marxist Feminism and Surrogate Motherhood', *Nature, Society, and Thought*, vol. 7, issue 3, 1994, pp. 281–298.

⁴⁵ M Dalla Costa, 'Capitalism and Reproduction', in W Bonefeld *et al.* (eds.), *Open Marxism, Vol. 3 Emancipating Marx*, Pluto Press, London, 1995, pp. 7–16.

⁴⁶ Blazier and Janssens, p. 74.

Psychological and Affective Aspects

The prohibition of financial compensation beyond reimbursed expenses situates surrogacy within a moral register of care and generosity rather than labour, obscuring the embodied and affective work of gestation and rendering the surrogate as a selfless maternal subject. Judicial data suggest a recurring pattern: Greek surrogates are often married women with children of their own, while migrant surrogates are more frequently single and economically precarious. Although kinship relations are not explicitly recorded, these patterns suggest an implicit preference for socially recognisable maternal figures whose gestational labour can be more readily naturalised as an act of care within dominant familial norms. Pande highlights a challenging dynamic across surrogacy markets, where surrogates are trained to embody the ‘perfect mother-worker’, combining compliance with idealised maternal attachment.⁴⁷ Moreover, Majumdar demonstrates that the figure of the stay-at-home mother operates to embed gestational labour within a moral economy of femininity that conceals its waged character.⁴⁸ The Greek psychosocial evaluations reproduce this logic, functioning to verify the surrogate’s conformity to the maternal ideal rather than to scrutinise the structural conditions of her consent.

Existing research in the Greek context further highlights that surrogacy is mediated through affective and relational processes, e.g. anxiety, ambivalence, attachment, control, gratitude, or stigma. This suggests that, besides its legislative dimension, reproductive labour is also organised via the psychosocial and cultural dimensions of care and subjectivity.⁴⁹ The surrogate is expected to consent and simultaneously inhabit a morally acceptable emotional position, marked by generosity and self-effacement. As Collard argues, altruism depoliticises gestation by separating its affective and corporeal demands from its economic function. In the Greek context, this makes the surrogate’s labour legible through moralised rhetoric rather than through the structural conditions that organise and constrain it. These affective constructions are reinforced by a broader ideological formation historically organised around the moral triad of *patris*, *thriskia*, *oikogeneia* (nation,

⁴⁷ A Pande, ‘Commercial Surrogacy in India: Manufacturing a Perfect Mother-Worker’, *Signs*, vol. 35, issue 4, 2010, pp. 969–992, <https://doi.org/10.1086/651043>.

⁴⁸ A Majumdar, ‘Conceptualizing Surrogacy as Work-Labour: Domestic Labour in Commercial Gestational Surrogacy in India’, *Journal of South Asian Development*, vol. 13, issue 2, 2018, pp. 210–227, <https://doi.org/10.1177/0973174118778481>.

⁴⁹ Z Papaligoura, D Papadatou, and T Bellali, ‘Surrogacy: The experience of Greek commissioning women’, *Women and Birth*, vol. 28, issue 4, 2015, pp. e110–e118, <https://doi.org/10.1016/j.wombi.2015.07.005>.

religion, family).⁵⁰ Motherhood in Greece is often constructed as intrinsic to womanhood and tied to ideals of family continuity and feminine citizenship/duty, as well as social respectability, existing within a continuum of societal pressure. This ideal sits uneasily alongside the prevalence of abortion and the economic pressures of crisis-shaped everyday life. Within this moral economy, the culturally valued mother is a subject who demonstrates responsibility and determination to perform 'good parenthood'. This reflects a neoliberal model of femininity in which motherhood and womanhood are increasingly constructed through individualised processes of self-making, where women are expected to regulate themselves and navigate reproductive choices as matters of personal responsibility and moral self-management.⁵¹ Paxson, for example, further explicates how reproductive life in Greece is shaped by a dense moral economy in which women are positioned as responsible for care and symbolic continuity of family.⁵² Within this context, surrogacy becomes ideologically tolerable only insofar as it can be made compatible with these norms. The surrogate can be a morally legible feminine subject whose gestational role is tolerated precisely because it is framed as in service of familial and societal continuity.

As a result, reproductive labour is both corporeal and economic but also psychological, internally reproducing social hierarchies. The psyche becomes a site where domination and recognition intersect—women's subordination is both externally imposed and internally negotiated. Marxist psychoanalytic feminists have shown that capitalism relies on appropriating women's affective capacities under the guise of moral obligation.⁵³ Surrogacy recasts these dynamics: care is contractual and precarious, recognition is legal-bureaucratic, and women's bodies become direct sites of economic value.

Jessica Benjamin's notion of recognition is useful here because it situates domination within relational economies of affection and dependence.⁵⁴ Applied to surrogacy, her framework can explicate how gestational labour is sustained through asymmetrical exchanges of recognition: the surrogate is positioned as the selfless caregiver who provides emotional and corporeal investment without equal acknowledgement or autonomy. Her identity, mediated through legal and

⁵⁰ E Gazi, "'Fatherland, religion, family': Exploring the history of a slogan in Greece, 1880–1930", in J de Groot and S Morgan (eds.), *Sex, Gender and the Sacred: Reconfiguring Religion in Gender History*, Wiley-Blackwell, Hoboken, 2014, pp. 304–314.

⁵¹ *Ibid.*

⁵² H Paxson, *Making Modern Mothers: Ethics and Family Planning in Urban Greece*, University of California Press, Berkeley, 2004.

⁵³ F Haug, 'Morals Also Have Two Genders', *New Left Review*, vol. 143, Jan/Feb 1984, <https://doi.org/10.64590/eet>.

⁵⁴ J Benjamin, *The Bonds of Love: Psychoanalysis, Feminism, and the Problem of Domination*, Pantheon Books, New York, 1988.

medical discourse, is constructed as self-effacing; a moralised figure of care that conceals the coercive conditions under which her labour is performed.

Such psychological and affective asymmetries are intensified by neoliberal discourses of empowerment, which reframe economic necessity as a personal choice. In this terrain, surrogacy is often narrated as evidence of women's agency, yet this apparent autonomy obscures the structural inequalities that compel participation in reproductive markets. As Holmstrom-Smith observes, neoliberal feminism celebrates the surrogate's 'entrepreneurial' role while naturalising her alienation from the labour and its product.⁵⁵ This alienation is reflected in how surrogates describe their own participation; in many ways, the surrogate's body is fragmented into units of value (gestation and contractual compliance) while her subjectivity is disciplined through the moralised rhetoric of care and sacrifice. As some surrogates themselves express, they 'make children for others so that they can support their own'⁵⁶—a statement that reveals the economic coercion underlying such arrangements and the asymmetrical conditions under which reproductive labour is negotiated. Read in this way, surrogacy becomes labour whose exploitation is sustained through its positioning as feminine duty instead of work.

Yet judicial oversight under Greek law remains largely procedural. Psychosocial evaluations are treated primarily as documentary evidence, while the absence of prohibited remuneration serves as the key indicator of legality. As a result, questions of dependency, economic pressure, unequal bargaining power, and the conditions under which consent is given remain largely outside judicial scrutiny; in many ways, the court converts complex affective relations into evidence of suitability.

These dynamics unfold within an increasingly technologised landscape of reproduction. To understand how reproductive labour is reshaped through clinical infrastructures and biotechnological mediation, the next section examines surrogacy within the context of biocapitalism, paying particular attention to the reconfiguration of kinship and the *oikos* (household/family-economic unit).

Biocapitalism and Kinship

Technological mediation represents a continuation of the capitalist control over reproduction. Biocapitalism refers to forms of capitalism in which biological life and bodily capacities themselves become sources of economic value. Reproductive

⁵⁵ A Holmstrom-Smith, 'Free Market Feminism: Re-Reconsidering Surrogacy', *University of Pennsylvania Journal of Law and Social Change*, vol. 24, no. 3, 2021, pp. 443–484.

⁵⁶ Maropoulou.

capacities, which, in the past, were exploited through unpaid domestic work, are now channelled through clinical and technological infrastructures that commodify the body at a molecular and gestational level.⁵⁷ Contemporary advances in biotechnology and digital medical infrastructures have transformed the nature of reproductive and bodily labour. They conceptualise ‘clinical labour’ as the work performed by those who participate in biomedical and reproductive industries (such as surrogates and clinical trial subjects) whose bodies become technologically mediated sites of value production. Simply put, in the era of biocapitalism, technology functions as the means through which life processes are extracted and eventually monetised.⁵⁸

Technological systems, from IVF and cryopreservation to genetic databases, render biological capacities quantifiable and exchangeable. They reorganise reproduction as a form of clinical production, subjecting gestation and fertility to logics of surveillance and contractual control. The clinic thus becomes a site of capitalist production, whilst the reproductive body is transformed into a technological interface for generating biovalue, intensifying women’s alienation from their reproductive capacities.⁵⁹

Legal and medical infrastructures deepen this abstraction by isolating reproductive labour from its social context and recoding it through bureaucratic and technocratic mechanisms.⁶⁰ Within these regimes, the reproductive subject is treated as an isolated unit of productivity, governed through standardised metrics of risk and efficiency. The surrogate becomes legible primarily through legal and biomedical frameworks, while her embodied experience and potential vulnerabilities remain ‘disguised’ by dominant discourses of autonomy and voluntarism. In Greece, these dynamics are materialised through decentralised reproductive networks, legal and clinical actors, and private fertility centres that operate as profitable hubs within transnational reproductive circuits.

Here, it is worth mentioning that, while contemporary surrogacy is increasingly structured through biotechnological advances and market-driven mechanisms, traditional Greek communities had developed socially accepted practices of ‘child offering’. More broadly, in rural and pre-modern Mediterranean societies, practices akin to surrogacy often emerged within kinship-based networks,⁶¹ where child

⁵⁷ M Cooper and C Waldby, *Clinical Labor: Tissue Donors and Research Subjects in the Bioeconomy*, Duke University Press, Durham, 2014.

⁵⁸ *Ibid.*

⁵⁹ *Ibid.*

⁶⁰ Banerjee and Kotiswaran.

⁶¹ P Loizos and E Papataxiarchis (eds.), *Contested Identities: Gender and Kinship in Modern Greece*, Princeton University Press, Princeton, 1991, <https://doi.org/10.2307/j.ctt1dxg888>.

rearing responsibilities were socially distributed, and biological motherhood was not the exclusive basis for maternal identity.⁶² These informal arrangements, such as the offer of a child from a fertile to an infertile relative, or from a reproductively able to an unable woman, were embedded in communal ties and moral economies of reciprocity. Such communal practices reaffirmed the patriarchal extended family as the central unit of social reproduction. The redistribution of children within kin groups, even under the guise of solidarity, upheld lineage continuity, inheritance norms, and heteronormative family ideals.⁶³ The child was treated as a symbolic and material asset, a bearer of name, property, and honour, whose placement served the strategic interests of the patriarchal household (*οἶκος*). The *oikos*, the central socio-economic structure through which property inheritance and household continuity were organised in ancient Greece,⁶⁴ has long functioned as a unit of both kinship and economic production, linking biological reproduction to status, land, and male lineage.⁶⁵

Similarly, contemporary anthropological work on kinship and motherhood in Greece highlights reproduction as a socially mediated and morally regulated familial project. The Greek family operates as a collective social formation structured by intergenerational and inter-dependent obligation, as well as the reproduction of kin continuity. In this context, motherhood is organised as intensive moral and affective labour, continuously evaluated through culturally dominant ideals of care and sacrifice ‘for the good of the child’.⁶⁶ Such discourses legitimise and naturalise women’s reproductive labour by framing it as a moral obligation to the family and its future. This is particularly significant in the Greek context, where modernisation has reconfigured familial relations through formations in which liberal notions of agency and choice coexist with familial obligations. Surrogacy in Greece must therefore be situated within this broader socio-cultural and historical

⁶² E Papadaki, *Πολιτικές της συγγένειας: Η υιοθεσία στη σύγχρονη Ελλάδα* [*Politics of Kinship: Adoption in Contemporary Greece*], Alexandria Publications, Athens, 2021.

⁶³ C B Brettell, ‘Kinship and Contract: Property Transmission and Family Relations in Northwestern Portugal’, *Comparative Studies in Society and History*, vol. 33, issue 3, 1991, pp. 443–465, <https://doi.org/10.1017/S0010417500017138>.

⁶⁴ C A Cox, *Household Interests: Property, Marriage Strategies, and Family Dynamics in Ancient Athens*, Princeton University Press, Princeton, 1998.

⁶⁵ R P Saller, *Patriarchy, Property and Death in the Roman Family*, Cambridge University Press, Cambridge, 1994; A Chatjouli, I Daskalaki, and V Kantsa (eds.), *Out of Body, Out of Home: Assisted Reproduction, Gender and Family in Greece*, (In)FERCIT, Alexandria Publications, Athens, 2015; B Fliche, ‘Social Practices and Mobilisations of Kinship: An Introduction’, *European Journal of Turkish Studies*, issue 4, 2006, <https://doi.org/10.4000/ejts.629>.

⁶⁶ C Vlachoutsikou, *Για το καλό των παιδιών: Μητέρες μιλούν για την ανατροφή των παιδιών τους* [*For the Good of the Children: Mothers Speak About Raising Their Children*], Nisos, Athens, 2015.

context; as a contemporary reorganisation of reproduction within a system long structured through gendered labour and familial obligation.

Scholars have shown that kinship is socially produced through embodied labour, social recognition, and institutional mediation. Assisted reproduction reconfigures these processes by distributing reproductive functions across multiple actors and institutions.⁶⁷ Surrogacy makes this particularly visible, as gestation, genetics, legal parenthood, and social motherhood become separated across different actors. Kinship thus emerges as a legal and social relation actively shaped by regulatory frameworks that determine which reproductive arrangements are recognised and legitimised.⁶⁸ As noted earlier, the persistence of the nuclear family as a legal and ideological norm reflects a central mechanism through which capitalism organises dependency and care.⁶⁹ In Greece, the privatisation of reproductive labour has long relied on classed and gendered relations, with migrant women performing much of the intimate labour that sustains household reproduction.⁷⁰ The expansion of migrant domestic work from the 1990s onwards, and its intensification during the financial crisis, rendered such arrangements increasingly normalised.⁷¹ Against this backdrop, surrogacy appears less as a rupture than as a reconfiguration of established forms of reproductive service. While Greek surrogacy law fragments motherhood into genetic, gestational, and legal functions, it ultimately preserves the nuclear family as the primary site of kinship.⁷² Reproduction is reorganised through legal and biomedical technologies but remains oriented towards securing parental exclusivity and the continuity of

⁶⁷ V Kantsa, 'Ποιος φτιάχνει τη συγγένεια;' ['Who Constructs Kinship?'], in V Kantsa (ed.), *Μεταβαλλόμενες συγγένειες: Σύγχρονες μορφές οικογένειας στην Ελλάδα* [*Changing Kinships: Contemporary Forms of Family in Greece*], Alexandria Publications, Athens, 2012, pp. 11–21.

⁶⁸ A Kotzampasi, 'Παιδιά χωρίς νομικό δεσμό συγγένειας: Η παράβαση των προϋποθέσεων της υποβοηθούμενης αναπαραγωγής και οι συνέπειές της' ['Children Without a Legal Kinship Bond: The Violation of the Conditions of Assisted Reproduction and Its Consequences'], in E Kantsa, A Papataxiarchis, and G Zaniias (eds.), *Μεταβαλλόμενες σχέσεις: Συγγένεια και τεχνολογία στην Ελλάδα* [*Changing Relations: Kinship and Technology in Greece*], Alexandria Publications, Athens, 2014, pp. 69–92.

⁶⁹ D O'Brien, 'Fairness, Care, and Abortion', *Journal of Applied Philosophy*, vol. 40, issue 4, 2023, pp. 658–675, <https://doi.org/10.1111/japp.12661>.

⁷⁰ P Topali, 'Greek and Filipina Domestic Workers in Contemporary Greece: The Reproduction and Transformations of Domestic Work, Domestic Relationships and Female Identities', *Journal of Mediterranean Studies*, vol. 18, issue 2, 2010, pp. 311–340.

⁷¹ I Psimmenos, 'The Social Setting of Female Migrant Domestic Workers', *Journal of Modern Greek Studies*, vol. 35, no. 1, 2017, pp. 43–66, <http://doi.org/10.1353/mgs.2017.0002>.

⁷² E Teman, *Birth of a Mother: The Surrogate Body and the Pregnant Self*, University of California Press, Berkeley, 2010.

the household. Taken together, the manifold aspects of surrogacy and kinship point towards the need for a conceptual reframing. The next section, therefore, advances a labour-centred perspective that challenges the proprietary logic of the nuclear family and proposes alternative configurations of reproductive justice.

Reframing Surrogacy

In Greece today, the surrogate retains the legal right to terminate or continue a pregnancy regardless of the intended parents' wishes. However, this autonomy often remains nominal, enshrined in contract yet undermined by structural power asymmetries. A meaningful recognition of the surrogate's subjectivity requires more than formal rights: it demands institutional practices that acknowledge her time, labour, and embodied investment. This could entail for instance, a framework in which the surrogate is recognised as a reproductive worker with social protections and a say in the conditions of the arrangement. This labour-centred reframing does not prescribe a single model of kinship or parenthood; rather, it opens space for plural configurations, including forms of ongoing relational recognition and maternal subjectivity that the current framework forecloses. It could also allow, should they so wish, their recognition as legal or social mothers, opening space for plural maternal subjectivities and kinship configurations. Echoing Sophie Lewis,⁷³ this vision shows that gestation need not be privatised or hidden within the confines of heteronormative family structures; rather, it unsettles the proprietary logic of parenthood and affirms the child not as the extension of the *oikos* but as a relational being nurtured within a broader common of care.

Placing reproductive labour at the centre of legal and ethical discourse requires challenging the Greek legislative approach, which treats pregnancy as a disruption to ordinary life rather than as labour in its own right. The surrogate's contribution is treated merely as a temporary burden requiring reimbursement. On the other hand, a criminalising stance risks pushing surrogacy underground, where it may occur under less regulated and more coercive conditions, rendering already marginalised groups even more vulnerable.

Thus, a move towards recognising surrogates as reproductive workers is necessary—one that, within the Greek context, would require the extension of occupational health protections, the substantive scrutiny of consent conditions within the judicial authorisation process, and the decoupling of the altruism requirement from the legal threshold of permissibility. As Banerjee and Kotiswaran argue, preventing compensation in the name of altruism does not

⁷³ S Lewis, *Full Surrogacy Now: Feminism Against Family*, Verso, London, 2019; S Lewis, *Abolish the Family: A Manifesto for Care and Liberation*, Verso, London, 2022.

eliminate exploitation; instead, it obscures it.⁷⁴ In contrast, a rights-based, labour-centred model constitutes a form of harm reduction: it recognises that *motherhood involves labour*, even when unpaid, and that the surrogate is not a passive vessel but a subject engaged in reproductive work. Calling for the recognition of surrogacy as labour is not about endorsing its commodification but about exposing the exploitative conditions that often emerge when reproductive labour is masked as an act of love. This recognition does not reduce to a demand for remuneration but for greater control over the conditions under which reproductive labour is organised and valued; *who controls the conditions of gestation, who captures its value, and under what regulatory arrangements surrogates acquire enforceable claims*.⁷⁵ A labour-centred, materialist feminist approach recognises surrogacy as technologically mediated reproductive labour within capitalist patriarchy,⁷⁶ located within the political economy of care, and provides the tools to contest it. To paraphrase Silvia Federici, to recognise gestation as work is the first step towards refusing to do it.⁷⁷ Within a social reproduction framework, this ‘refusal’ is not a literal withdrawal from gestation but a critical move that denaturalises reproductive labour, renders its conditions of extraction and depletion visible, and reconstitutes it as a site of collective contestation.

Conclusion

This paper has shown that surrogacy in Greece cannot be understood through moralising or biomedical framings alone but must be situated within the broader political economy of reproductive and affective labour under capitalism. Its central contribution lies in reframing surrogacy as part of a continuum of gendered and classed reproductive work, shaped by austerity, welfare retrenchment, and the ideological functions of Greek law. The analysis of judicial authorisation, contemporary constructions of altruism, and the medicalisation of gestation as ideological mechanisms reveals how the Greek legal regime renders reproductive labour both necessary and invisible, privileging intended parents while obscuring the surrogate’s embodied and affective work.

These tensions have become increasingly visible within contemporary European policy debates surrounding exploitation, regulation, and reproductive governance. The inclusion of ‘the exploitation of surrogacy’ in the revised European Union Anti-Trafficking Directive—introduced at a late stage of the legislative process

⁷⁴ Banerjee and Kotiswaran.

⁷⁵ Jana and Kotiswaran.

⁷⁶ *Ibid.*

⁷⁷ S Federici, *Wages Against Housework*, Power of Women Collective and Falling Wall Press, Bristol, 1975.

despite limited empirical evidence regarding trafficking for the exploitation of surrogacy and the pre-existing applicability of trafficking law to coercive or exploitative arrangements⁷⁸—marks a significant shift in the governance of surrogacy at the EU level. More broadly, this development reflects the continued expansion of carceral and governance feminist approaches that frame feminised and precarious forms of labour primarily through the language of criminalisation, exploitation, and victimhood. Critical anti-trafficking scholarship has long warned that expansive trafficking apparatuses collapse the distinction between forced and structurally constrained labour, shifting attention away from labour conditions and towards criminalisation and surveillance.⁷⁹ Similar to sex work, the incorporation of surrogacy into anti-trafficking frameworks risks reconstituting reproductive labour primarily as a site of criminal exploitation and moral regulation, rather than interrogating the political-economic conditions that render gestational labour vulnerable to coercion and exploitation in the first place. Rather than extending regulatory and punitive responses, the findings presented here demonstrate the need to centre reproductive labour itself—its conditions, organisation, and unequal distribution—within debates on care, intimate labour, migration, and exploitation.

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⁷⁸ B Franco and S Hoff, *Exploitation of Surrogacy as a Form of Human Trafficking: How did it end up in the amended EU Anti-Trafficking Directive?*, La Strada International, Amsterdam, 2025; La Strada International, *Comparative Analysis of the Legal and Policy Landscape on (Trafficking for the Exploitation of) Surrogacy Across Europe*, La Strada International, Amsterdam, 2025.

⁷⁹ See, for example, C Gallant and E Lam, *Not Your Rescue Project: Migrant Sex Workers Fighting for Justice*, Haymarket Books, Chicago, 2024; E Bernstein, 'Militarized humanitarianism meets carceral feminism: The politics of sex, rights, and freedom in contemporary antitrafficking campaigns', *Signs: Journal of Women in Culture and Society*, vol. 36, issue 1, 2010, pp. 45–71, <http://doi.org/10.1086/652918>.

Intimate Labour, Gendered Violence, and Exploitation among Live-in Home Care Workers in Kerala, India

Anakha Ajith

Abstract

Paid live-in eldercare in private households in India has expanded, yet the sector remains weakly regulated and offers few enforceable rights. Drawing on qualitative research conducted in Kerala with live-in caregivers, care recipients, and nursing agency owners, this article examines how intimate care is governed within private homes and why harm remains difficult to address. Gendered morality, caste hierarchy, and agency-managed silence set the terms of work. Agency manuals instruct workers to ‘love the patient like kin’ and to ‘be emotionally neutral’, which turns affection and patience into conditions of employment and channels disputes back to the agency. Since care is often framed as an extension of family duty rather than formal employment, incidents rarely enter criminal processes and are often overlooked within routine labour oversight. Caregivers respond through quiet resistance, from confronting discriminatory clients and concealing caste identity to setting limits and seeking transfers. However, change remains incremental without collective organisation. By tracing how emotion, caste, and agency mediation intersect in Kerala’s home care sector, the article demonstrates that treating this labour as kin-like duty blurs accountability, weakens protections, and reinforces unequal conditions in live-in home care.

Keywords: care work, intimate labour, live-in eldercare, exploitation, caste, Kerala

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Introduction

Across the globe, demographic ageing, the growing prevalence of chronic illness, and strained health and social care systems have produced a crisis of care. Rather than expanding public provision, states and markets often rely on low-paid

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women whose labour takes place in other people's homes. What is also clear is that despite its increasing importance for elders, care work remains undervalued and weakly protected, even as it sustains households, economies, and welfare systems.¹ In India, these dynamics are evident in the growth of paid domestic work and newer forms of home-based care for older adults. The state of Kerala is a particularly important site for studying this shift. Its population aged 60 and above was 12.6 per cent in 2011, compared with the national average of 8.6 per cent, and had surpassed 20 per cent by 2024. Ageing in Kerala is shaped by low fertility, rising life expectancy, and continuing migration of younger adults.² Studies of emigrant households indicate that adult children's migration influences older people's care arrangements, often shifting responsibility to older spouses, daughters-in-law, female siblings, or paid caregivers.³ In affluent transnational households, migration has also encouraged the purchase of proximate care through local markets, including home-based paid eldercare.⁴ In this context, families increasingly employ live-in caregivers, most of them women, to provide round-the-clock support for older relatives, often through home nursing agencies that recruit, train, and place workers. These workers perform a hybrid role that combines intimate bodily care, basic medical tasks, emotional support, and domestic work. Agencies and most client households often describe this labour through the language of service, patience, affection, and respectability. However, these moral expectations coexist with precarious working conditions, including low wages, long working days, unclear task boundaries, restricted rest and mobility, dependence on agencies for future placements, and limited access to complaint channels or support mechanisms. These conditions are enabled by fragmented regulation, the treatment of the private home as a family space rather than a workplace, and the intimate character of care, all of which allow exploitation, violence, and abuse to persist with little scrutiny or redress.⁵ Studies of household

¹ L Addati *et al.*, *Care Work and Care Jobs for the Future of Decent Work*, International Labour Office, Geneva, 2018, pp. 2–11; S Brady, 'Neoliberal Capitalism, Older Adult Care and Feminist Theory', *CLR James Journal*, vol. 28, issue 1–2, 2022, pp. 85–108, <https://doi.org/10.5840/clrjames202312797>.

² S I Rajan *et al.*, *Growing Old in Kerala: A Gendered Revisit*, Working Paper XIV, International Institute of Migration and Development, 2025, pp. 1–5, <https://iimad.org/wp-content/uploads/2025/06/Growing-Old-in-Kerala-A-Gendered-Revisit.pdf>.

³ A P Ugargol and A Bailey, 'Reciprocity between Older Adults and Their Care-Givers in Emigrant Households of Kerala, India', *Ageing & Society*, vol. 41, issue 8, 2021, pp. 1699–1725, p. 1700, <https://doi.org/10.1017/S0144686X19001685>.

⁴ Sreerupa, 'Transnational Migration, Local Specificities and Reconfiguring Eldercare through "Market Transfer" in Kerala, India', *Journal of Ethnic and Migration Studies*, vol. 49, issue 4, 2023, pp. 1014–1031, <https://doi.org/10.1080/1369183X.2022.2115629>.

⁵ N Neetha, 'Misconstrued Notions and Misplaced Interventions: An assessment of state policy on domestic work in India', *The Indian Journal of Labour Economics*, vol. 64, no. 3, 2021, pp. 543–564, <https://doi.org/10.1007/s41027-021-00334-w>; X F Zhong

work also document verbal abuse, humiliation, sexual harassment, and the use of kinship language that describes workers as ‘like family’ while denying clear contracts, social protection, and meaningful avenues for complaint.⁶

Situating live-in care within the home/workplace and public/private divide also matters for anti-trafficking debates. In domiciliary care, the private household functions simultaneously as a site of family life, paid labour, residence, and supervision, making labour harms less visible and harder to regulate. Compared with construction, factories, or sex work, domestic and care labour in private homes receives less attention in discussions of trafficking, forced labour, and severe exploitation. Labour exploitation should not only be understood through exceptional cases of trafficking or modern slavery, since many harms are produced through ordinary labour arrangements and regulatory systems.⁷ In the live-in care sector, overwork, surveillance, caste-based exclusion, sexual harassment, and constrained exit may appear routine, but together they form a continuum of everyday abuse. Rather than treating live-in care work as trafficking, this article uses anti-trafficking debates to examine how coercion, dependency, and weak accountability are normalised when paid care is organised through the moral authority and privacy of the family home.

Drawing on research with live-in caregivers for older persons in Kerala, this article examines how women employed in this sector describe pathways into care work, everyday labour and living arrangements, and experiences of abuse, control, and constraint in clients’ homes. It contributes to debates on the private home as a workplace by showing how, in the live-in care sector, paid work, residence, intimacy, and supervision are organised within the same household space. It also extends Indian research on domestic and care work by focusing on agency-placed live-in care for older people, a form of work in which caste-based domestic

and S Shorey, ‘Experiences of Workplace Violence among Healthcare Workers in Home Care Settings: A qualitative systematic review’, *International Nursing Review*, vol. 70, issue 4, 2023, pp. 596–605, <https://doi.org/10.1111/inr.12822>; S Thakkar, ‘Exploitation, Harassment and Violence: Lived experiences of women paid domestic workers in India’, *Journal of South Asian Development*, vol. 19, issue 1, 2024, pp. 44–60, <https://doi.org/10.1177/09731741231164872>.

⁶ A Vijayalakshmi, P Dev, and V Kulkarni, ‘Domestic Workers and Sexual Harassment in India: Examining preferred response strategies’, *World Development*, vol. 155, 2022, art. 105875, <https://doi.org/10.1016/j.worlddev.2022.105875>; Thakkar, p. 47; S Banerjee and L Wilks, ‘Work in Pandemic Times: Exploring precarious continuities in paid domestic work in India’, *Gender, Work & Organization*, vol. 31, issue 4, 2024, pp. 1505–1523, <https://doi.org/10.1111/gwao.12858>.

⁷ J Quirk, C Robinson, and C Thibos, ‘Editorial: From Exceptional Cases to Everyday Abuses: Labour exploitation in the global economy’, *Anti-Trafficking Review*, issue 15, 2020, pp. 1–19, <https://doi.org/10.14197/atr.201220151>.

hierarchy is tied to bodily care, emotional discipline, and home nursing agencies.⁸ What emerges is an account of exploitation as ordinary and cumulative, in which live-in caregivers are made vulnerable through kin-like expectations, caste-coded household practices, agency mediation, constrained exit, and the depletion of bodily, emotional, and social capacities.

Literature Review

Paid live-in caregiving is a form of intimate labour centred on bodily proximity, emotional engagement, and the management of private aspects of life. In India, it is closely linked to waged domestic labour: both are performed in private households, often by lower-caste and economically marginalised women, and shaped by employer ideas of cleanliness, respectability, and availability. Studies of domestic work show how caste-coded practices structure access to utensils, toilets, seating, and shared space, while marking workers' bodily service as less valued.⁹

Scholarship on the global care economy has documented the gendered organisation of care work and its systematic devaluation. Feminist work on older adult care further shows how market-based care arrangements depend on gendered, racialised, and classed hierarchies to contain the costs of social reproduction.¹⁰ The concept of depletion is crucial here because it explains that social reproductive labour can exhaust workers' bodily, emotional, and social capacities when the costs of maintaining life are displaced onto those with the least power.¹¹ These debates help locate paid live-in eldercare within wider political economies of social reproduction.

Work on care and domestic labour in India develops these insights in relation to class, caste, and family. As per Choudhury and Das's study of *ayahs* [paid domestic care attendants] in care for older people, families draw on paid carers to uphold ideals of filial duty while distancing themselves from stigmatised bodily care, placing *ayahs* ambiguously between worker and quasi-kin.¹² Other studies of domestic work highlight how intimate care is folded into broader domestic

⁸ S M Rai, C Hoskyns, and D Thomas, 'Depletion: The Cost of Social Reproduction', *International Feminist Journal of Politics*, vol. 16, issue 1, 2014, pp. 86–105, <https://doi.org/10.1080/14616742.2013.789641>.

⁹ S Sharma, 'Of Rasoi ka Kaam/Bathroom ka Kaam: Perspectives of women domestic workers', *Economic & Political Weekly*, vol. 51, issue 7, 2016, pp. 52–61.

¹⁰ Addati *et al.*, pp. 166–167; Brady.

¹¹ Rai, Hoskyns, and Thomas.

¹² A Choudhury and A K Das, 'Care as Work: Ayahs and eldercare practices in India', *International Journal of Care and Caring*, vol. 7, issue 4, 2023, pp. 601–618, p. 614, <https://doi.org/10.1332/239788221X16704462186238>.

responsibilities, blurring the boundary between care, service, and household labour.¹³

Research on household workplaces documents sexual harassment, verbal abuse, humiliation, underpayment, long hours, and workers' reliance on low-confrontation strategies to preserve livelihoods.¹⁴ Studies also show that crises such as the COVID-19 pandemic intensified pre-existing precarity.¹⁵ Although much of this work focuses on housework and childcare, global research on home care workers demonstrates that care in clients' homes exposes workers to violence from patients and family members, as well as blurred expectations around domestic tasks.¹⁶ Green and Ayalon similarly explain how isolated work inside private homes blurs professional boundaries and exposes both live-in and live-out workers to rights violations and abuse.¹⁷ Together, these studies suggest a continuum of violence, from everyday humiliation to overt abuse.

These dynamics are entwined with caste and class. Research on caste and domestic work reveals how employers distinguish between 'cleaner' and more 'polluting' tasks, enforce separate utensils, eating spaces, and toilets, and naturalise the idea that lower-caste and poorer women are suited to intimate or menial work in private homes.¹⁸ Studies of rural domestic workers also demonstrate that claims to dignity and worker status remain constrained by caste-marked service, bodily stigma, and economic dependency.¹⁹ This literature underscores that intimate labour in India cannot be understood apart from caste, class, and gender.

At the level of law and policy, scholars have traced the limited and contradictory ways in which the Indian state has engaged with domestic and care work. There is no central legislation that clearly defines the household as a workplace, determines employer and agency accountability, or guarantees enforceable rights to wages, hours, rest, leave, social security, occupational safety, and grievance redress. Existing interventions have taken partial forms: domestic work has been

¹³ Banerjee and Wilks.

¹⁴ Vijayalakshmi, Dev, and Kulkarni; Thakkar.

¹⁵ Banerjee and Wilks.

¹⁶ Zhong and Shorey.

¹⁷ O Green and L Ayalon, 'Violations of Workers' Rights and Exposure to Work-Related Abuse of Live-In Migrant and Live-Out Local Home Care Workers – A preliminary study: Implications for health policy and practice', *Israel Journal of Health Policy Research*, vol. 7, 2018, art. 32, <https://doi.org/10.1186/s13584-018-0224-1>.

¹⁸ Sharma, p. 53.

¹⁹ D Singh, 'Invisible Toiling Hands: The work and life of domestic workers in rural India', *The Economic and Labour Relations Review*, vol. 36, issue 3, 2025, pp. 691–707, <https://doi.org/10.1017/elr.2025.10036>.

included in minimum wage notifications in several states; welfare board and social security models have been attempted unevenly; domestic workers have been brought within unorganised worker and social security discussions; and the *Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act* of 2013 formally includes domestic workers. Skill-development initiatives and draft policy proposals have also sought to professionalise the sector. However, these measures remain limited by weak implementation, uneven state-level coverage, unclear employer registration, and the difficulty of inspection and complaint inside private homes. This matters especially for live-in care workers because regulation designed around public workplaces, fixed hours, visible employers, and standard employment relationships does not address residence inside the employer's home, round-the-clock availability, agency mediation, or blurred responsibility between households and intermediaries.²⁰

Intermediaries who match workers and households have become increasingly important. Research on placement agencies reveals that they mediate hiring, discipline workers' conduct, impose fees and penalties, and train workers to conform to middle-class household norms.²¹ Agencies are therefore reshaping how care workers are recruited, monitored, and distributed, but without necessarily improving worker protection.

Anti-trafficking scholarship helps frame harms that remain hidden in home-based care work. Quirk, Robinson, and Thibos argue for attention to 'everyday abuses' that sit alongside, and sometimes beneath, exceptional cases of trafficking and modern slavery.²² Palumbo's work on domestic care in Italy similarly illustrates how exploitation can be normalised when the state relies on households to resolve care needs while treating abuse as private or exceptional.²³ This perspective allows

²⁰ M Poddar and A Koshy, 'Legislating for Domestic "Care" Workers in India: An Alternative Understanding', *NUJS Law Review*, vol. 12, issue 1, 2019, pp. 67–116; Neetha; R Agarwala and S Saha, 'The Employment Relationship and Movement Strategies among Domestic Workers in India', *Critical Sociology*, vol. 44, issue 7–8, 2018, pp. 1207–1223, <https://doi.org/10.1177/0896920518765925>; A Agarwal, 'Locating the "Nanny" in Legal Theory', *National Law School Journal*, vol. 17, no. 1, 2023, pp. 27–49, <https://doi.org/10.55496/VIFS4282>.

²¹ S Grover, 'Placement Agencies for Care-Domestic Labour: Everyday mediation, regimes of punishment, civilizing missions, and training in globalized India', *Modern Asian Studies*, vol. 56, issue 6, 2022, pp. 1901–1929, <https://doi.org/10.1017/S0026749X21000585>.

²² Quirk, Robinson, and Thibos.

²³ L Palumbo, 'Exploiting for Care: Trafficking and abuse in domestic work in Italy', *Journal of Immigrant & Refugee Studies*, vol. 15, issue 2, 2017, pp. 171–186, <https://doi.org/10.1080/15562948.2017.1305473>.

attention to coercion, dependence, denied exit, and weak accountability without collapsing all exploitative conditions into trafficking.

Finally, studies of domestic and care worker organising highlight both possibilities and constraints for collective action. Worker organisations and unions can create spaces for relief, claims-making, and grievances around wages, care provision, and dignity. However, dispersed workplaces, informal employment, and dependence on employers and intermediaries make collective organising difficult.²⁴

Across these bodies of work, there is relatively little focused attention to agency-placed live-in eldercare workers in private homes, particularly in Kerala. Existing Indian research tends to focus either on domestic workers more broadly, *ayahs* in care for older persons, or placement-agency mediation, while global studies of home care often concentrate on nurses, health aides, or migrant care workers in high-income countries. Building on this literature, this article treats live-in care as a distinct form of intimate labour, showing how caste-coded hierarchy, emotional discipline, agency mediation, weak regulation, and household violence make exploitation appear commonplace in care relations.

Methods

This article draws on a qualitative, interpretive research design. It treats live-in care work not only as tasks but as a social relationship shaped by caste, gender, class, intimacy, and agency control. The article is based on a larger study of home-based care of Kerala's ageing population, carried out between May 2018 and February 2021 in southern and central districts: Thiruvananthapuram, Kollam, Pathanamthitta, Alappuzha, Kottayam, Ernakulam, and Thrissur. The aim of the study was to examine how agency-placed live-in care work is organised and experienced inside private homes.

The larger study included interviews with 150 live-in caregivers (referred to as 'home nurses'), 24 home nursing agency owners or managers, and 76 clients or family members using agency services. Of the 150 caregivers, 130 were women and 20 were men. This article primarily draws on the women caregivers' accounts because its focus is gendered violence, feminised expectations of care, and women's vulnerability within live-in intimate labour. Interviews with men were used only to contextualise general work arrangements and agency practices. The mean age of the female caregivers was 48.66 years. Their average schooling and mean work experience in home-based care were 8.3 years and 7.61 years,

²⁴ P Krishnan, 'Intersectional Grievances in Care Work: Framing inequalities of gender, class and caste', *Mobilization: An International Quarterly*, vol. 25, issue 4, 2020, pp. 493–512, <https://doi.org/10.17813/1086-671X-22-4-493>.

respectively, and most earned a monthly income of INR 12,000–15,000 (approx. USD 170–215). Caste was treated as a sensitive subject, and participants were not prompted to disclose it. It is therefore not presented as a complete demographic profile, but analysed through accounts of household treatment and everyday discrimination.

Participants were recruited mainly via home nursing agencies identified through newspaper advertisements and online listings. Initial meetings were held with agency owners or managers to explain the study and seek access to workers and clients. Where lists were available, respondents were selected at random when possible. This was supplemented by direct approaches to caregivers at agency offices, client homes, and workers' homes, as well as snowball referrals, to reduce dependence on agency-selected respondents. Interviews with workers were not conducted in the presence of agency owners, clients, or family members. Participants were told that agencies would not be informed about what they said, that refusal would not affect their placement, and that they could stop the interview at any point.

Data was obtained through in-depth, semi-structured interviews conducted in Malayalam, in locations participants considered safe and convenient. Interviews usually lasted between 45 minutes and one hour and twenty minutes. They were not audio-recorded, as early requests to record were declined by some participants, and recording was then avoided to reduce discomfort or any impression that the researcher was linked to a government or monitoring authority. Detailed notes were taken during and immediately after interviews and later translated or summarised in English for analysis. Most fieldwork was completed before the COVID-19 lockdown; later interviews were conducted by phone where participants were willing and reachable.

Analysis was conducted manually. Interview notes were read several times and coded thematically around entry into care work, agency rules, working and living conditions, restrictions on movement and communication, caste-based treatment, verbal and sexual harassment, complaint pathways, and workers' responses. No qualitative software was used. As this was a single-researcher study, formal inter-coder reliability was not applicable. To maintain consistency, the researcher compared themes across worker, agency, and client accounts and kept analytic notes on recurring patterns, contradictions, and emerging interpretations.

Approval for the study was obtained from the Institutional Ethics Committee of the University of Hyderabad. Identifying details of workers, agencies, clients, and households have been removed. The researcher's position as a Malayalam-speaking woman researcher from Kerala helped build conversational trust with many women caregivers. However, differences in education, socio-economic background, and institutional affiliation may have shaped what participants chose to disclose.

Limitations

This article is based on qualitative research in southern and central Kerala and relies primarily on caregivers' narratives, supplemented by agency and client interviews. The findings are not statistically representative and may not capture experiences in other regions, non-agency arrangements, or other forms of home care. Agency and snowball recruitment may have excluded isolated workers, former caregivers, or those who left after severe abuse. Reliance on field notes rather than audio recordings may have limited exact phrasing, although it helped participants discuss sensitive experiences more freely. Men's experiences are not analysed in depth because the article foregrounds women caregivers.

Findings

The findings demonstrate how agency-placed live-in care turns intimate care of older adults into continuous, caste-marked, and gendered labour, while leaving workers with limited ways to contest abuse beyond adjustment, quiet resistance, or exit.

Entering Live-in Care: Life circumstances and social position

Though women entered live-in home care from different life circumstances, most shared economic insecurity, family responsibility, and limited access to stable employment. Agency owners described many workers as hailing from strained households and turning to home nursing when other options were unavailable. Caregivers often entered after widowhood, divorce, loss of earlier employment, chronic illness in the family, debt, or an abusive marriage. For many, live-in care offered one of the few ways to secure a regular income while supporting children, repaying loans, or meeting medical expenses.

One caregiver described live-in care as a necessity rather than a choice:

There is no one else to bring money home. My husband drinks and does not work regularly. My children are studying, and my mother is aged. I cannot sit at home and wait for someone to help us. I came for this work because I need a steady income, even if it means staying away from home.
(Malini, age 48)

Such accounts reveal that live-in care is often taken up under compulsion, though not always without attachment to the work. A smaller number of caregivers expressed interest in caring for older or chronically ill people, especially when they had cared for relatives or had basic medical training. Even then, paid care remained tied to household survival. The language of service, patience, and duty coexisted with debt, children's educational costs, and financial independence.

Caste and religion also shaped entry into live-in care and access to placements. Agency owners reported that many Hindu caregivers belonged to lower or backward caste groups, with only a small minority from higher castes such as *Nair* or *Pillai*. Some workers anticipated discrimination and avoided disclosing caste or religious identity to clients.

This was also visible in the accounts of upper-caste caregivers. Vijayamma, a higher-caste Hindu, stated she was often treated with ease in client households and allowed to eat with the family:

In most houses, they let me sit and eat with them. I think they look at things like caste, appearance, and cleanliness. Since I am from a good caste and look clean, they do not feel uncomfortable coming close to me or dining with me. (Vijayamma, age 62)

Her statement establishes how caste can be spoken through cleanliness, appearance, and suitability for intimate bodily work. Caregivers from stigmatised caste backgrounds were more likely to encounter suspicion, distancing, or rejection in clients' homes. Some upper-caste caregivers described their entry into hands-on care only because of financial hardship, while suggesting that lower-caste women were better suited to perform such intimate and bodily work. Live-in care, therefore, draws in women already marked by economic vulnerability. At the same time, access to placements and treatment inside households remain shaped by caste-coded ideas of purity, hygiene, and social proximity.

'Always on Call': Organising work and life in employer households

Caregivers described everyday work in clients' homes as an almost continuous cycle of tasks, with little separation between medical care, personal care, and domestic work. Their day often began before the older person woke up and continued late into the night. Alongside bathing, feeding, administering medicines, and cleaning the patient's room or washroom, many were expected to help with household tasks, especially when no domestic worker was present.

These routines were shaped by agency instructions and household expectations. Some agencies gave written or verbal guidelines requiring workers to remain near the patient, avoid personal phone use, speak politely, smile, and show affection towards older people. Workers were repeatedly reminded to 'treat the patient like your own parent'. In practice, this language of kin-like care often expanded their duties beyond patient care.

Maya, who took care of a paralysed patient, described how extra work became normalised as part of being a 'good' live-in worker:

My main responsibility was caring for the patient, but I also cleaned her room and bathroom. If the maid did not come, I helped with cooking and other household work. I never refused. No client has complained about me to the agency. When we stay in their house day and night, I think we should show that much courtesy. (Maya, age 52)

Her account illustrates how additional tasks were absorbed into ideas of courtesy, adjustment, and maintaining a good reputation with the agency. Although workers were called ‘home nurses’, the title neither limited their role to nursing the patient nor protected them from being treated as all-purpose household labour. In the absence of enforceable care plans, written task limits, or protections for working hours, duties were often defined by household convenience rather than by any clear employment standard.

The live-in arrangement intensified these demands. Most caregivers slept in the same room as the older person so they could respond immediately at night. Those caring for bedridden, disoriented, or cognitively impaired patients described turning them, changing diapers or sheets, preventing falls, and calming them when restless. Night was not a period of rest but an extension of duty. Georgina, caregiver of an Alzheimer’s patient with incontinence, said:

I am always afraid that something may happen if I sleep deeply at night. Even if I am tired, I have to work the next morning. The agency says we can sleep during the day if we are awake at night, but it does not always happen like that, right? (Georgina, age 49)

This constant alertness produced exhaustion but was treated as part of live-in duty rather than additional labour. Even tasks requiring training or careful handling were often devalued as ordinary women’s work. Omana, who assisted a post-surgery patient with basic physiotherapy, recalled:

They say, ‘You are only moving the leg and hand. What skill is there in that?’ But if I do it wrongly, the patient will suffer. (Omana, age 44)

In this way, live-in care blurred boundaries between nursing, bodily service, emotional attentiveness, and domestic labour. Workers were expected to be technically competent, emotionally patient, and constantly available, while the skill and strain involved remained poorly recognised.

Caste, Cleanliness, and Devaluation in Care Relationships

Caste-based distinction appeared in many caregivers' accounts of daily life in clients' homes. On arrival, some women were quietly assessed through questions about their names, hometowns, religions, and habits, followed by instructions that marked their place in the household. These rules often concerned food, utensils, seating, and access to toilets.

Rajani, who worked in an elite upper-class household, described how a separate tumbler was first presented as ordinary household practice:

They told me, 'It is better if you use only this glass, because you are new here.' At first, I thought it was only for a few days. Later, I realised no one else touches that glass. It was kept only for me. (Rajani, age 46)

Such practices were not always named as caste discrimination, but workers recognised them as caste-based distance. Separate utensils, eating after the family, sitting away from the dining area, or being watched in household spaces made caregivers feel that their labour was needed but their presence was not fully accepted. Some recalled overhearing relatives describe them as *ketta vargam* [an awful or degraded category], a phrase that condensed caste, class, and moral judgement into everyday speech.

Caste could shape placement even before workers entered the household. One respondent articulated:

Some houses ask the agency before hiring itself, 'Which caste is she?' If they hear our caste, they say they want someone else. (Bindhu, age 54)

Client interviews confirmed that caste preference was not only a worker perception. Although only ten clients openly stated they preferred someone from their own community, sixteen disclosed that they avoided workers from Scheduled Castes, Scheduled Tribes, or Muslim backgrounds. Some described such workers as 'not culturally compatible', while others associated workers from certain lower castes with a lack of hygiene. These accounts testify to how caste could be expressed through apparently neutral concerns about culture, cleanliness, or suitability.

Bodily care and cleaning were described as another site of humiliation. Caregivers who bathed older people, changed diapers, cleaned wounds, and washed soiled clothes expressed that employers sometimes spoke as if such work naturally belonged to women from their background. A home nurse recalled an employer saying, 'This is the job for people like you, we are not used to it', when she hesitated to clean a dirty toilet. Such comments were experienced not only as criticism of work but as attacks on personhood.

A few caregivers resisted when discrimination became explicit. One of them recalled being asked to use an outside toilet rather than the toilet attached to the patient's room. She confronted the client:

You expect me to clean the older patient, but my touch isn't clean enough for your bathroom? (Sheeja, age 43)

Her question captures the contradiction of caste-marked intimate labour. Caregivers were expected to touch, clean, lift, and comfort older people, yet their own bodies could be treated as polluting. Live-in care made workers indispensable to family care arrangements while exposing them to caste-based distancing, suspicion, and devaluation.

Surveillance, Restricted Mobility and Institutional Silence

Alongside heavy workloads, caregivers described a constant sense of being watched and controlled in clients' homes. Employers often wanted someone 'always with the patient', which meant workers were rarely left alone. Some households used CCTV cameras in common areas or in the patient's room, while others relied on phone calls or surprise visits by relatives. Several caregivers described surveillance as ordinary household life rather than an exceptional practice:

Even if I sit for five minutes, someone will call and ask, 'Where are you, what are you doing?' (Malini, age 48)

Restrictions on mobility intensified this control. Several caregivers were allowed outside only for hospital visits or approved errands, and even short walks or religious visits could be refused. Some were asked not to make long phone calls or speak with family members in a language unfamiliar to the patient. Employers justified such rules in terms of patient safety, but workers experienced them as limits on their time, bodies, and communication.

Leave was also difficult to claim, even when agencies had formally promised it. Leela, who cared for the elderly mother of a Non-Resident Indian (NRI) family, said leave depended on the household's convenience. She also found it difficult to insist because the patient had become emotionally dependent on her:

They say we can go home once a month, but when I ask, they say, 'Not now, Amma [mother] is not well' or 'There is no replacement'. Her children are abroad, and she is now attached to me. I also feel bad leaving her alone. But if I insist, they may tell the agency I'm not adjusting. I need this work, so I keep quiet. (Leela, age 54)

This account shows how exit was restricted by employer control, emotional attachment, migrant family arrangements, and fear of losing a placement. Caregivers who depended on the income to repay loans or support children's education often tolerated restrictions rather than risk being labelled difficult.

When workers complained, agencies often framed restrictions as matters to be tolerated. A home nurse with two years of work experience recalled being told to 'adjust' to the household's demands:

When I told the agency that they were not letting me go out or use the phone properly, they said, 'Adjust cheyyanam [You must adjust], this is a good case from a reputed family.' You know, if we make too many problems, they will not send us to good houses later. (Suma, age 42)

In agency language, such placements were called *nalla veedu* [a good home] or *nalla case* [a good contract], signalling that the worker should not risk losing it. Complaints were therefore routed back into agency mediation rather than formal labour or grievance mechanisms. Restrictions on food, leave, phone use, mobility, and rest were treated as 'small issues' or matters of household adjustment, not as violations of enforceable work regulations. The result was a structure of restricted choice: employers controlled household space, agencies controlled future placements, and caregivers carried the burden of adjusting to remain employable.

Sexual Harassment, Physical Aggression, and Bodily Vulnerability

Caregivers' accounts included physical aggression and sexual harassment connected to the intimate, bodily nature of live-in care. Women caring for patients with dementia, stroke, paralysis, or other neurological conditions described being scratched, hit, pushed, or verbally abused during bathing, toileting, feeding, or lifting. Some recognised that these actions were linked to illness, but the injury and exhaustion remained theirs to bear. Mercy, who cared for a bedridden man after a stroke, said:

When I changed his diaper or turned him, he would suddenly hit my hand or push me away. His children said he does not know what he is doing, but the pain is on my body. A few days back, I had bruises on my arms. (Mercy, age 57)

Sexual harassment was narrated more cautiously, often after trust had been established. Women described unwanted touching during transfers or exercises, suggestive jokes, comments about their bodies, and explicit propositions. Harassment came from older male patients, male relatives, or visitors. One caregiver described unwanted touching by a male relative but said complaining felt risky:

If I say it openly, who will believe me? It happened inside their house. They may say I misunderstood or that I am making up a story. Then I will lose the contract, and my name will also be spoilt. (Shyla, age 44)

The private household made it difficult for caregivers to avoid contact or produce witnesses. Women who spent long hours in the same room as older male patients, especially when family members were away, described remaining alert and uncomfortable. Some tried to manage risk by keeping a light on at night, sleeping near the door, avoiding particular men, speaking sharply when boundaries were crossed, or involving female relatives in intimate care. These strategies offered limited protection because the worker still depended on the household and agency.

When workers requested transfers from such placements, agencies sometimes treated the matter as an adjustment rather than a safety issue. A caregiver recalled:

I told the office that I did not feel comfortable there. Our agency owner said, 'He talks like that to everyone, don't take it seriously.' After that, I only asked them to transfer me somewhere else. (Shyama, age 39)

Although formal complaint routes exist in law, workers' accounts suggest that the private household and dependence on agencies made such routes difficult to access in practice. Safety concerns were more often converted into transfer requests than recognised as workplace complaints. Very few caregivers pursued police complaints or legal action. Many doubted they would be believed, feared reputational damage, or worried about losing future placements. As a result, harassment and aggression were often handled through avoidance, transfer requests, or quiet exit. These accounts substantiate how physical proximity, unequal power, and household privacy expose caregivers to bodily harm while limiting routes for redress.

Negotiating Dignity: Quiet resistance, exit strategies, and constrained agency

Despite these constraints, caregivers did not describe themselves as mere victims. Many spoke of preserving dignity within difficult placements by setting limits, refusing some demands, or leaving households where humiliation became unbearable. Rema (age 48), who had worked as a home nurse for over seven years, described dignity as the ability to occupy household space. She recalled several instances from her years in care work: being made to eat outside (once near the dog kennel), discouraged from sitting with the family to watch television, and kept away from the household's prayer space.

For several workers, dignity also meant distinguishing care work from servitude. Thankamma, who cared for a bedridden woman, explained:

I came here for work, not to be treated like a slave. I will do the patient's work, but I will not accept being spoken to as if I have no value.
(Thankamma, age 49)

Caregivers used small tactics to protect themselves: refusing tasks beyond their role, insisting on time to call home, avoiding particular family members, or asking the agency for a transfer. These actions were usually framed politely because open conflict could lead to a complaint against them or loss of future placements. For Sathi, a home nurse with eight years of work experience, caste insult marked the limit of adjustment:

If it is about work, I can listen and adjust. But when they bring caste into it, I feel I should not remain in that house. (Sathi, age 51)

When conditions became intolerable, transfers or exits were often the only available routes. However, walking out without agency approval could mean unpaid wages, a bad report, or fewer placements later. Since live-in arrangements and long hours made formal organising difficult, workers relied on informal networks, sharing information about 'good' and 'bad' houses, and warning newcomers about particular clients or agencies.

These practices corroborate that caregivers were not passive recipients of abuse. They asserted boundaries, protected small areas of time and bodily autonomy, and used transfers or exits when necessary. However, such strategies rarely changed the wider organisation of live-in care. Agency control, household dependence, and the need for income meant that resistance often remained individual, cautious, and temporary.

Discussion

Exploitation in live-in care of older adults is not only produced through isolated abuse, excessive work, or non-payment. It is also the result of how intimate labour is organised inside private homes, where kin-like expectations, caste-marked bodily devaluation, agency mediation, and restricted exit combine to make such conditions difficult to contest. Existing literature has established that care work is feminised, undervalued, and treated as an extension of women's natural capacities. This article advances that argument by demonstrating how affection and kinship become forms of labour discipline in agency-placed live-in care. Instructions to treat the patient 'like one's own parent' or remain cheerful and forbearing make refusal, rest, and complaint appear morally inappropriate. This resonates with Choudhury and Das's account of *ayahs* as ambiguously positioned between worker and quasi-kin, Johnson's argument that care workers' emotional labour can be naturalised to justify economic devaluation, and England's observation that caring motives and attachment can make workers vulnerable to accepting

lower rewards or worse conditions.²⁵

The analysis also deepens caste-based accounts of domestic work by depicting that the label ‘home nurse’ does not undo older hierarchies of purity, pollution, and bodily service. Sharma explains how domestic workers are allocated ‘clean’ and ‘dirty’ tasks through caste-based distinctions. This study traces how similar distinctions travel into eldercare, where workers may bathe, lift, clean, and comfort older people while being denied equal access to food, utensils, toilets, and household space. Rai, Hoskyns, and Thomas’s concept of depletion helps extend this caste analysis from stigma to political economy. In live-in care, the labour of sustaining older bodies is shifted onto women whose caste and class positions make bodily service appear natural, while the exhaustion, humiliation, sexual vulnerability, and emotional strain produced by this work remain theirs to absorb. Caste, therefore, operates not only through interpersonal exclusion but also through the distribution of care’s costs, i.e. who cleans, lifts, soothes, stays awake, absorbs anger, and remains available so that households can secure care without reorganising their own lives.²⁶

The organisation of live-in care also depends on home nursing agencies, which appear to professionalise the sector while dispersing accountability between client households and agencies. This article extends Grover’s analysis of placement agencies by examining how home nursing agencies in Kerala formalise recruitment while informalising responsibility. They assign workers to households, issue behavioural instructions, and mediate transfers. However, when workers complain about food, leave, surveillance, harassment, or caste humiliation, agencies often translate these claims into an issue of ‘adjustment’. This is not merely weak enforcement; it is a labour-control mechanism. Tan’s work on live-in domestic workers is useful here: when home is both workplace and site of rest, employers gain control over workers’ sleep, mobility, communication, and privacy.²⁷ In Kerala’s agency-mediated care of older people, this control is intensified by dependence on future placements and fear of bad reports.

The article’s relevance to anti-trafficking debates lies in its attention to labour harms that remain ordinary, cumulative, and difficult to name within existing

²⁵ Choudhury and Das; E K Johnson, ‘The Business of Care: The moral labour of care workers’, *Sociology of Health & Illness*, vol. 37, issue 1, 2015, pp. 112–126, <https://doi.org/10.1111/1467-9566.12184>; P England, ‘Emerging Theories of Care Work’, *Annual Review of Sociology*, vol. 31, issue 1, 2005, pp. 381–399, <https://doi.org/10.1146/annurev.soc.31.041304.122317>.

²⁶ Sharma; Rai, Hoskyns, and Thomas.

²⁷ Grover; S J Tan, ‘When the Home Is Also the Workplace: Women migrant domestic workers’ experiences with the “live-in” policy in Singapore and Hong Kong’, *Anti-Trafficking Review*, issue 20, 2023, pp. 75–91, <https://doi.org/10.14197/atr.201223205>.

legal and policy categories. Live-in care for older people takes place inside the family home, but the harms workers describe are not merely private disputes or interpersonal conflicts. They are shaped by the organisation of intimate labour across the public/private divide, where the household is also a workplace and where agency mediation, caste hierarchy, gendered expectations, and weak regulation structure workers' vulnerability. Quirk, Robinson, and Thibos call for attention to 'everyday abuses' built into economic and regulatory systems rather than appearing only as exceptional violations.²⁸ Palumbo similarly argues that exploitation in domestic care can become normalised when care is treated as a private family matter and abuse is addressed only in extreme cases.²⁹ The responses of caregivers in this study nevertheless remained individual and fragile, offering protection only when they could avoid retaliation or secure another placement. This mirrors research on sexual harassment among domestic workers in India, where women often rely on low-confrontation responses to preserve livelihoods.³⁰ It also resonates with home-care violence studies showing that isolated work inside private homes exposes workers to abuse from clients and relatives.³¹ Krishnan further reminds us that caste, class, and gender shape whose grievances become collective claims.³² Theoretically, this article demonstrates how live-in care of older adults in Kerala makes exploitation ordinary through the moral, spatial, and institutional arrangements that organise home-based care: kinship, caste, depletion, agency-managed silence, and restricted exit.

Policy Implications

The study findings point to several areas where policy and practice need to change if live-in care workers are to be protected as workers rather than treated as dependants within private households. Since exploitation is produced across agencies and households, responses cannot only focus on extreme abuse or individual bad employers. Home nursing agencies require clearer regulation, licensing, and oversight covering recruitment, contracts, wages, working hours, rest, leave, placement records, payments, and deductions. Agencies should remain accountable after placement by monitoring conditions in clients' homes, not merely maintaining paperwork.

Live-in eldercare needs to be recognised as labour performed in a private household, with enforceable protections such as minimum wages, weekly rest

²⁸ Quirk, Robinson, and Thibos.

²⁹ Palumbo.

³⁰ Vijayalakshmi, Dev, and Kulkarni.

³¹ Green and Ayalon.

³² Krishnan.

days, paid leave, accident cover, health insurance, and pension access. Rest and leave are safeguards against depletion, not favours to be granted at the household's discretion. Gifts or end-of-contract tokens from clients should not be treated as substitutes for wages, overtime pay, leave, or payment for work beyond the agreed care plan.

Caregivers need safe ways to report violence, sexual harassment, caste discrimination, excessive work, or leave denial without the risk of losing wages, being blacklisted, or missing out on future placements. Agencies could arrange emergency transfers where safety is at risk and refer serious complaints to labour authorities, women's commissions, or other relevant bodies. Caste discrimination in household workplaces needs to be recognised as a labour rights and dignity issue, not a private household custom. Client households could also receive written orientation on duties, rest time, privacy, phone use, anti-discrimination norms, and complaint procedures. Peer networks, helplines, drop-in centres, and off-site meetings are essential for isolated live-in workers to access information, emergency assistance, and collective support.

Conclusion

This article has examined agency-placed live-in care of older adults in Kerala as intimate labour shaped by caste, gender, class, migration-linked care deficits, and weak regulation. It has argued that exploitation in this sector is produced not only through exceptional abuse but through typical arrangements that require caregivers to be continuously available, morally obligate them to 'adjust', and render them dependent on agencies for future placements. Kin-like care blurs the boundary between affection and entitlement, making rest, refusal, and complaint difficult to claim.

The article's contribution lies in showing how caste-inflected devaluation persists within work presented as 'home nursing'. Caregivers may be indispensable to older people's bodily and emotional care, but they remain socially distanced within the households where they live and work. Their labour is also depleting, consuming sleep, bodily strength, emotional capacity, social connection, and dignity, with limited routes for recovery or redress.

The scope of this analysis also points to the need for further work on live-in eldercare across different regions and institutional arrangements. Comparative studies of care organised through hospitals, charities, brokers, agencies, and digital platforms could show how different intermediaries shape workers' vulnerability and bargaining power. Research on male caregivers, migrant care workers in Kerala, former workers, client families, and agency decision-making would further clarify how live-in care of older adults is produced, sustained, and contested.

Caregivers set boundaries, seek transfers, share information, and exit harmful placements where possible. However, such strategies remain constrained when agencies, households, and regulatory systems fail to recognise live-in care as enforceable labour. Addressing exploitation, therefore, requires moving beyond household gratitude, kinship language, and informal adjustment towards labour protections that recognise live-in care as skilled work and caregivers as workers entitled to safety, dignity, and fair terms of care.

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Intimacies in Tension: Bodily labour across sex work and domestic work in Southern Europe

Isotta Rossoni and Begoña Aramayona

Abstract

This paper analyses domestic work and sex work as interrelated forms of intimate labour in Southern Europe, with a focus on Spain, Italy, and Malta. Despite their distinct regulatory regimes and social perceptions, both sectors rely on the commodification of bodily presence, care, and emotional engagement, often performed by migrant and racialised women. Inspired by feminist scholarship on intimate labour, the paper explores how intimacy, exploitation, and agency are negotiated differently across these two sectors within the specific socio-political and cultural configurations of Southern Europe. Drawing on the analysis of secondary sources and extensive qualitative fieldwork with sex workers and domestic workers in Spain, Italy, and Malta, the authors interrogate what makes these contexts distinct and how workers strategically navigate precarity, stigma, and legal ambiguity. The paper identifies convergences and divergences in the lived experiences of domestic workers and sex workers, particularly in how they experience boundaries of care, control, and commodification. The research findings highlight the need for greater comparative research, especially in regions like Southern Europe where such scholarship remains fragmented.

Keywords: intimacy, sex work, domestic work, migration, exploitation, Southern Europe

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Introduction

Sex work and domestic employment share deep structural and cultural links in Southern Europe, emerging as two of the most visible and gendered components of the region's informal economies. Marked by weak welfare and familialistic regimes, and affected by increased transnational migratory flows since the 1990s,

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countries like Spain, Italy, and Malta have received thousands of migrants from the Global South, the majority of whom are racialised women offering sexual/erotic and domestic services.¹ Since the 2000s, a restrictive migratory regime has reinforced a segregated labour market, where many non-Western transnational migrants are forced to accept the most precarious and socially devalued jobs while navigating uncertainty and persecution, particularly in situations of irregularity.

Despite their overlapping dimensions, sex work and domestic work differ starkly in their regulatory regimes and how they are portrayed in public discourse. Although both activities implicate some type of commodification of bodily presence, care, and a degree of emotional engagement, sex work is often portrayed as naturally degrading for those performing and consuming it.² Consequently, public policies in Southern Europe have tended to resist recognising sex work as work, favouring ‘end demand’ and ‘exit’ strategies, in a bid to—wishfully—put an end to the sex industry.³ By contrast, domestic employment, although high in demand in Southern European countries,⁴ has often been absent from public discourse and parliamentary agendas. This has reinforced a dated regulatory framework in the region. Although governed via distinct approaches, both domestic employees and sex workers have been prevented from fully accessing labour rights and being

¹ The notion of ‘familialistic regimes’ and ‘weak welfare states’ in Southern Europe refers to welfare systems historically characterised by a more limited institutional development compared to Central and Northern European welfare states, where families—rather than public institutions—continue to absorb significant responsibilities for care, social protection, and everyday survival. See M Ferrera, ‘The “Southern model” of welfare in social Europe’, *Journal of European Social Policy*, vol. 6, issue 1, 1996, pp. 17–37, <https://doi.org/10.1177/095892879600600102>; C Martin, ‘Southern Welfare States: Configuration of the Welfare Balance between State and the Family’, in M Baumeister and R Sala (eds.), *Southern Europe? Italy, Spain, Portugal, and Greece from the 1950s until the Present Day*, Campus Verlag, Frankfurt-on-Main, 2015, pp. 77–100.

² T Daniel, J Lamb, and C Campbell, ‘Avoidance and Empowerment: How Do Sex Workers Navigate Stigma?’, *Sexualities*, vol. 28, issue 1–2, 2025, pp. 470–491, <https://doi.org/10.1177/13634607231201736>.

³ J Camilleri and I Rossoni, ‘Charting Sex Work in Malta: First Steps’, *Sociological Research Online*, 2026, <https://doi.org/10.1177/13607804261421049>; L Rubio Grundell, ‘The Rise of Neo-Abolitionism in Europe: Exploring the Role of the Neoliberalism–Vulnerability–Security Nexus in the Prostitution Policies of the United Kingdom, Spain, France, and Ireland’, *Social Politics: International Studies in Gender, State & Society*, vol. 29, issue 3, 2022, pp. 1034–1056, <https://doi.org/10.1093/sp/jxab018>; P Degani and L Perini, ‘The Italian Public Policies Frame on Prostitution and the Practical Overlapping with Trafficking: An Inevitable Condition?’, *Peace Human Rights Governance*, vol. 3, issue 1, 2019, pp. 35–68, <https://doi.org/10.14658/pupj-phrg-2019-1-2>.

⁴ DOMINA Observatory on Domestic Work in Europe, *Domestic Work in Europe (Report - 2023 Edition)*, retrieved 31 July 2026, <https://www.domesticworkobservatory.com/domestic-work-in-europe-2023>.

socially recognised for their contributions to society and the economy.

The restrictive, criminalising structural drivers and ambiguities surrounding intimate labour make both sectors susceptible to different forms of exploitation and abuse. Yet, the uneven and contrasting treatment between these two sectors helps construct a sanitised representation of domestic work and a demonised portrayal of sex work. While both forms of labour can entail a high degree of intimate and affective engagement, public narratives tend to overemphasise the aspects associated with abuse and exploitation in the case of sex work, all the while underestimating or entirely ignoring those same dynamics in domestic service.⁵

Inspired by feminist scholarship on intimate labour, in this paper we draw on qualitative and ethnographic data gathered through interviews and participant observation with sex workers and domestic workers in Spain, Italy, and Malta. The data allow us to explore similarities and differences in intersections of intimacy and exploitation across these two sectors within the specific socio-political and cultural configurations of Southern Europe. We begin with a theoretical exploration of the concept of intimacy in sex work and domestic work. We then move on to setting the scene of the research, delving deeper into the Southern European landscape of sex work and domestic work and unpacking governance overlaps across the two sectors. After detailing methodological considerations, we present the key findings emerging from the qualitative data, teasing out convergences and divergences in the lived experiences of domestic workers and sex workers. Crucially, our findings point towards a striking, counter-intuitive conclusion to dominant thought: that intimate boundaries are more clearly articulated in sex work and less explicitly codified in the case of domestic work. Finally, we highlight the pressing need for a comparative research agenda, especially in regions like Southern Europe where such scholarship remains fragmented.

Intimacy and Exploitation in Sex Work and Domestic Work

The notion of paid-for or commercialised intimacy has received considerable attention in feminist and sociological scholarship. Amongst others, Hochschild⁶

⁵ B Aramayona, ““Darkening” Informalized Workers: Moral Geographies and the In/Visibilization of Transnational Migrants in Spain”, *International Journal of Urban and Regional Research*, vol. 49, issue 4, 2025, pp. 892–911, <https://doi.org/10.1111/1468-2427.13328>.

⁶ A R Hochschild, *The Managed Heart: Commercialization of Human Feeling*, University of California Press, Berkeley, 1983; A R Hochschild, *The Outsourced Self: Intimate Life in Market Times*, Metropolitan Books, New York, 2012.

as well as Boris and Parreñas⁷ have explored how care work and sex work blur the boundaries between intimacy and waged labour, revealing how affective ties can be commodified through market relations. This literature challenges the assumption that intimacy belongs solely to the private sphere, showing how it becomes a site of economic exchange and social inequality.⁸ Sex work clearly exemplifies this shift. Beyond interactions that could be strictly defined as ‘sexual’, scholars have pointed to a demand for intimate services of various kinds, such as companionship, physical closeness or touch, and empathic listening.⁹ These activities match, to a large extent, those carried out by care workers operating outside the sex industry¹⁰ and reflect a growing appetite for forms of ‘authentic’ human connection, even if at a fee.¹¹

Bernstein¹² brings forth the experiences of middle-class sex workers, arguing that they respond to the demand for connection by engaging in ‘bounded authenticity’ defined as ‘the sale and purchase of authentic emotional and physical connection’¹³ which is limited in time. In other words, they create a time-bound experience of authenticity by producing desire and pleasure that appear genuine. Sex workers’ ability to engage in time-bound authenticity is often viewed as influenced—and therefore also constrained—by their social positioning within the sex work industry, as well as broader systems and structures.¹⁴ At the same time, research

⁷ E Boris and R S Parreñas (eds.), *Intimate Labours: Cultures, Technologies, and the Politics of Care*, Stanford University Press, Stanford, 2010.

⁸ *Ibid.*; V A Zelizer, *The Purchase of Intimacy*, Princeton University Press, Princeton, 2007.

⁹ E Bernstein, ‘Bounded Authenticity and the Commerce of Sex’, in Boris and Parreñas, pp. 148–165; L Pettinger, ‘Market Moralities in the Field of Commercial Sex’, *Journal of Cultural Economy*, vol. 6, issue 2, 2013, pp. 184–199, <https://doi.org/10.1080/17530350.2012.740418>; T Sanders and K Hardy, *Flexible Workers: Labour, Regulation and the Political Economy of the Stripping Industry*, Routledge, Abingdon, 2014; R Colosi, “‘I’m Just with the Guys and We’re Having a Laugh’: Exploring Normative Masculinity in a Lap-Dancing Club Setting, as a Heteronormative Space”, *Sexualities*, vol. 25, issue 3, 2022, pp. 222–241, <https://doi.org/10.1177/1363460720957205>.

¹⁰ S Jäger, ‘Self-Determined Sex Work as Care Work between Experiences of Integrity and Vulnerability’, *De Ethica*, vol. 7, issue 3, 2023, pp. 61–74, <https://doi.org/10.3384/de-ethica.2001-8819.237361>.

¹¹ S Schuchmann, “‘I Tell Them the Story That They Want to Hear That Day’: Emotion Management, Emotional Labour, and Authenticity as a Digital Sex Worker – The Case of OnlyFans”, *Porn Studies*, 2025, pp. 1–17, <https://doi.org/10.1080/23268743.2025.2501322>.

¹² E Bernstein, *Temporarily Yours: Intimacy, Authenticity, and the Commerce of Sex*, University of Chicago Press, Chicago, 2007.

¹³ Bernstein, ‘Bounded Authenticity’, p. 154.

¹⁴ K I Nayar, ‘Working It: The Professionalization of Amateurism in Digital Adult Entertainment’, *Feminist Media Studies*, vol. 17, issue 3, 2017, pp. 473–488, <https://doi.org/10.1080/14680777.2017.1303622>; H Sultana, ‘Intimacy, Trust, and Exploitation:

has shown that in other types of sex work, including more precarious ones such as street-based sex work, emotional labour is also present, although expressed and experienced in different ways.¹⁵ These complex and oftentimes contradictory experiences of sex work as affective work challenge common readings of intimacy, including those which associate it primarily with middle-class sex work.¹⁶

Crucially, migration regimes, gendered and racialised labour markets, and laws play a key role in rendering the commodification of intimacy both a necessity and an opportunity for many migrant women beyond the sex work sector.¹⁷ In both domestic work and sex work, *hirability* is shaped by racialised and gendered biases which construct migrant women as sexually promiscuous.¹⁸

The social representation of domestic workers and sex workers differs substantially, shaping broader perceptions of each sector and influencing the ways in which intimacy is negotiated in everyday work. Domestic workers are often incorporated into households as family members, a framing that obscures labour relations while creating expectations of loyalty and emotional availability.¹⁹ In contrast, sex workers are frequently cast as ‘the other’,²⁰ outsiders, or even antagonists to normative family models. Both sectors, however, involve complex, ongoing negotiations of bodily and emotional labour, highlighting how intimacy,

Sex Workers’ Relationship with Their Intimate Partners in a Bangladeshi Brothel’, *Asian Journal of Social Science*, vol. 50, issue 4, 2022, pp. 284–291, <https://doi.org/10.1016/j.ajss.2022.04.002>; A P Gutiérrez Garza, ‘The Intimacy of the Gift in the Economy of Sex Work’, *American Anthropologist*, vol. 124, issue 4, 2022, pp. 767–777, <https://doi.org/10.1111/aman.13782>.

¹⁵ M A Carbonero Gamundí and M Gómez Garrido, ‘Being Like Your Girlfriend: Authenticity and the Shifting Borders of Intimacy in Sex Work’, *Sociology*, vol. 52, issue 2, 2018, pp. 384–399, <https://doi.org/10.1177/0038038516688609>; R Alarcón-Medina and M Ayala-Constantino, ‘A Night Shift Ethnography of Sexual Labor: Street Prostitution, Space, and Intimacy in Tijuana’s Zona Norte Red Light District’, *Dialectical Anthropology*, vol. 50, 2026, pp. 621–645, <https://doi.org/10.1007/s10624-026-09812-3>.

¹⁶ *Ibid.*

¹⁷ E Zambelli, ‘Intimate Others and Risky Tenants: Disentangling the Economy of Affect Shaping Women’s Migratory Projects in Italy’, *Journal of Political Power*, vol. 12, issue 3, 2019, pp. 425–442, <https://doi.org/10.1080/2158379X.2019.1669265>.

¹⁸ See B Anderson and J O’Connell Davidson, *Is Trafficking in Human Beings Demand Driven? A multi-country pilot study*, International Organization for Migration, Geneva, 2003, pp. 7–12, for considerations on the sex work sector.

¹⁹ R S Parreñas, ‘Migrant Domestic Workers as “One of the Family”’, in B Anderson and I Shutes (eds.), *Migration and Care Labour: Theory, Policy and Politics*, Palgrave Macmillan, London, 2014, pp. 49–64.

²⁰ S Bell, *Reading, Writing, and Rewriting the Prostitute Body*, Indiana University Press, Bloomington, 1994.

care, and affect are constantly managed in everyday work practices.

Importantly, while intimacy is present in both lines of work, the boundary between intimacy and exploitation is often fragile. Intimacy, while central to these forms of labour, may create the illusion of trust or familiarity that can be strategically exploited by clients or employers to overstep boundaries or inflict harm.²¹ These risks are further compounded by the social and legal marginalisation of workers who are frequently migrant, racialised, and engaged in stigmatised forms of labour, limiting their access to protection and justice.²² Consequently, the combination of isolation, precarity, and the commodification of intimacy situates both domestic workers and sex workers in environments where violence is a structural possibility embedded within the organisation of intimate labour.

Context - Sex work and domestic work in Southern Europe

Domestic Work and Sex Work in Southern Europe: The reconfiguration of Southern European care and intimacy markets since the 1990s

As a result of their familialistic welfare regimes and comparatively weak welfare states, countries such as Spain and Italy exhibit some of the highest rates of domestic employment in Europe, accounting for 65% of the total domestic employment demand in Europe.²³ This situation is partly linked to the limited capacity of the state to provide adequate public social and healthcare infrastructures, the persistent difficulties in reconciling work and family life, and the enduring gender inequalities that continue to shape domestic and care responsibilities across Southern Europe.²⁴ Crucially, this ‘externalisation’ of care and domestic activities across the region can only take place because it relies on low-paid labour with limited protections for workers. Indeed, a large proportion of domestic workers are migrant women from the Global South, many of whom are employed through informal arrangements without social security contributions.²⁵

²¹ Hochschild, 1983; Hochschild, 2012.

²² Anderson and O’Connell Davidson; B Ehrenreich and A R Hochschild (eds.), *Global Woman: Nannies, Maids, and Sex Workers in the New Economy*, Metropolitan Books/Henry Holt and Company, New York, 2004; T Sanders, *Sex Work: A risky business*, Willan Publishing, Cullompton, 2005.

²³ DOMINA Observatory on Domestic Work in Europe.

²⁴ M Petmesidou, A M Guillén, and E Pavolini, ‘Health Care in Post-Crisis South Europe: Inequalities in Access and Reform Trajectories’, *Social Policy & Administration*, vol. 54, issue 5, 2020, pp. 666–683, <https://doi.org/10.1111/spol.12563>.

²⁵ Oxfam, *Esenciales y sin derechos: o cómo implementar el convenio 189 de la OIT para trabajadoras del hogar*, 2021.

The once locally sourced *señoritas de servicio* or *cameriere*—Spanish or Italian women from rural or socioeconomically marginalised backgrounds who were traditionally employed to ‘serve’ in elite households—have progressively been replaced by migrant women from the Global South since the 1990s.²⁶

This shift represents not only a change in the ethnic or national composition of the workforce but also a broader restructuring and expansion of the sector itself, both in terms of labour supply and demand. The proliferation of migrant women performing household cleaning as well as elder- and childcare in the private homes of middle- and upper-middle-class families across the region is to be understood as part of the transnational reorganisation of social reproduction and the feminisation of migratory flows. This has been facilitated by a legal framework that formally recognises domestic work as a distinct occupational category yet remains weakly regulated in practice, characterised by limited labour protections, scarce public oversight, and, crucially, low wages.²⁷ As such, the domestic and care sector in Southern Europe constitutes a paradigmatic site where global inequalities, gendered labour regimes, and state withdrawal from welfare provision intersect.

Similarly to domestic employment, sex work constitutes another major sector of activity for many women arriving from the Global South.²⁸ It also operates largely outside formal regulations, shaped by a combination of criminal law provisions and public-order regulations. In Spain, for instance, while the selling and purchase of sex are not criminalised, activities such as street solicitation and third-party facilitation are constrained through the *Citizens’ Security Law* (Ley Orgánica 4/2015, ‘Ley Mordaza’) and municipal ordinances on public space. Likewise, in Italy, activities such as facilitation, procurement, and third-party organisation of sex work are heavily penalised, producing a regime of tolerated but structurally informalised work. In Malta, too, activities such as solicitation and sharing flats with other sex workers (generally associated with brothel-keeping) are criminalised.²⁹ Across these contexts, sex work is therefore not regulated as labour but constrained and partially criminalised, generating a zone

²⁶ S Monteros Obelar, ‘El Empleo de Hogar Como Campo de Batalla: Breve Historia de Los Movimientos de Las Luchas En España’, *Afin*, issue 111, 2019, pp. 1–11.

²⁷ C Catarino and L Oso, ‘La inmigración femenina en Madrid y Lisboa: hacia una etnización del servicio doméstico y de las empresas de limpieza’, *Papers (Universitat Autònoma de Barcelona)*, issue 60, 2000, pp. 183–207.

²⁸ TAMPER, *National Mapping Reports – Spain*, 2010, pp. 278–289; Asociación In Género, *El impacto de la COVID-19 en la vida de las personas que ejercen la prostitución: un estudio en cinco comunidades autónomas de España*, 2021.

²⁹ I Rossoni and J Camilleri, ‘Borders, Barriers, and Violence: Healthcare Challenges in (Migrant) Sex Work’, in V Padovese and I Rossoni (eds.) *Intersections of Sexual Health, Migration and Sexualised Violence*, Springer Nature Switzerland, Cham, 2026, pp. 39–54.

of legal ambiguity and liminal legality.³⁰ In practice, this enables the existence of semi-formal private venues where sex work takes place (such as commercial sex clubs or apartments), while simultaneously leaving sex workers without labour protections. Whether criminalised, tolerated, or situated in a legal grey zone, sex work provides flexible income-generating opportunities for individuals excluded from formal labour markets.

Public Discourse, Regulations and the Rescue Industry: Governance cross-overs in domestic and sex work

Public narratives surrounding sex work and domestic work diverge profoundly. While both government and media discourses tend to be marked by widespread condemnation of the allegedly degrading nature of the sale of sexual services, the ethical dimensions involved in the hiring decisions of domestic and care workers remain scarcely questioned.³¹ Indeed, as we have argued elsewhere for the Spanish case,³² and in ways that can also be extended to other countries such as Italy or Malta, over the past twenty years Southern Europe has witnessed a reinforcement of criminalising public governance over migrant labour, resulting in the displacement of migrant workers, particularly women, into ‘darker’ or invisibilised spaces, sheltered from—or stripped of—public oversight.

This is exacerbated by punitive migration regimes leading to increased persecution of migrants—particularly, but not exclusively, in public spaces—due to their frequent condition of administrative irregularity. The difficulty of circulating freely in public spaces, combined with other factors such as the inability to access independent housing, has led many to opt for live-in domestic work. In the case of sex work, increased persecution and criminalisation in public spaces has forced many sex workers to shift to *indoor* settings (e.g. strip clubs and apartments). Many studies show this often leads to increased dependency on third-party operators

³⁰ A Oliveira, *Less Equal than Others: The Laws Affecting Sex Work, and Advocacy in the European Union*, Report for the GUE/NGL Group of the European Parliament, 2020, <http://bloco.org/media/LessEqualThanOthers.pdf>.

³¹ B Aramayona, ‘La invisibilización de la informalidad en la ciudad nocturna: el desplazamiento de trabajadoras sexuales y domésticas hacia espacios privados’, *Forum Sociológico, Série II*, issue 43, 2023, pp. 35–45, <https://doi.org/10.4000/sociologico.11969>; B Aramayona, ‘Las sombras de la noche: Clandestinización de La Informalidad Urbana En Las Geografías Del Placer Del Sur de Europa’, *Punto Sur*, issue 11, 2024, pp. 138–156, <https://doi.org/10.34096/ps.n11.14232>.

³² *Ibid.*

(e.g. club managers), reduced autonomy,³³ and limited protection from police persecution.³⁴

The relationship between sex work and domestic employment in Southern Europe reflects the structural precariousness experienced by migrant women, as sex work often becomes necessary to sustain livelihoods that cannot be secured through low-paid and undervalued forms of formally recognised labour, including domestic work. Migrants often combine sex work with formal jobs, using sex work to meet daily needs, while other jobs help regularise their legal status and mitigate stigma. Publicly funded prostitution-assistance programmes—often criticised by pro-rights organisations as part of the ‘rescue industry’—help sustain and reproduce this revolving door between sex work and other precarious forms of employment (such as domestic work). Much of their interventions, guided by the ‘exit programme’ paradigm, whose ultimate goal is for women to abandon prostitution,³⁵ offers as an alternative access into other low-paid, feminised jobs: training courses to work in supermarkets, elder care, or childcare, further entrenching precarity.

Methods

This paper draws on two separate datasets of qualitative interviews conducted across Spain, Italy, and Malta. The first author conducted research with over 30 migrants with experiences of sex work living in Malta between 2022 and 2024. Recruitment was facilitated via the island’s main sexual health clinic and snowball sampling. A sexual wellness kit was offered in return for participation. The study was approved by Leiden Law School’s ethics committee.

³³ C Arella *et al.*, *Los pasos (in)visibles de la prostitución: Estigma, persecución y vulneración de derechos de las trabajadoras sexuales en Barcelona*, Virus Editorial, Barcelona, 2007; M Barcons Campmajó, ‘Las ordenanzas municipales: entre la regulación y la sanción de la prostitución en España’, *Crítica Penal y Poder*, issue 15, 2018, pp. 90–109; P Sánchez-Perera, *Crítica de la razón puta: Cartografías del estigma de la prostitución*, La Oveja Roja, Madrid, 2023.

³⁴ I Rossoni and M van der Woude, ‘Resisting “Manufactured” Vulnerability: Discretionary Policing and Migrant Sex Workers’ Resistance Strategies in Malta’, *International Journal of Crime, Justice and Social Democracy*, vol. 15, no. 3, 2026, pp. 85–99, <https://doi.org/10.5204/ijcsd.3909>.

³⁵ L M Agustín, *Sex at the Margins: Migration, labour markets and the rescue industry*, Zed Books, London, 2007; P M Martín, ‘¿Abrimos una oenegé? Aproximación a la intervención social en contextos de prostitución en España’, *Itinerarios de Trabajo Social*, vol. 5, 2025, pp. 51–59, <https://doi.org/10.1344/its.i5.47890>; N Mai *et al.*, ‘Migration, sex work and trafficking: The racialized bordering politics of sexual humanitarianism’, in B Holzberg, A Madörin, and M Pfeifer (eds.), *The Sexual Politics of Border Control*, Routledge, London, 2022, pp. 123–144; Degani and Perini.

The second author carried out research with 20 migrants who had worked either as sex workers or care/domestic workers in Spain and Italy between 2021 and 2024. She conducted open-ended, paid interviews in cafés and, in the case of sex workers, sometimes their homes. Interviewees were recruited through word of mouth, including feminist scholars and colleagues. The study was approved by Sheffield University's research ethics committee. In line with feminist ethnography,³⁶ field records also became part of the fieldwork framework, substantively informing and sustaining the overall analytical reflection.

In both studies, participants' confidentiality and anonymity were ensured through informed consent, anonymisation, secure data storage, and clear communication that participation was voluntary and unrelated to access to healthcare (in the case of the first author, in particular) or immigration status. Risks to participants' safety, wellbeing, and employment were minimised by allowing them to skip questions and withdraw at any time. Participants were included if they had prior or current involvement in sex work or domestic work, were over 18, and were not nationals of the country where the fieldwork was conducted. EU and non-EU migrants, as well as a variety of individuals with different migration statuses, gender identities, and sexual orientations, were included in the sample. Sex work experience comprised street work, indoor escorting, erotic dancing/performing, and digital sex work, with all participants working either—sometimes concurrently—as independent operators or for third parties (sex clubs, apartments, or agencies). Domestic work experience included both live-out and live-in work, including a broad range of activities such as cleaning, taking care of old and young people, etc. This allowed for representation of a variety of experiences and for broad exploration of vulnerability and agency across different life paths. The coding process was both deductive and inductive, guided by preliminary themes (e.g. intimacy, exploitation) whilst also leaving room for themes to emerge organically.

Results

Love, Intimacy and Work: Overlaps and tensions

Our findings reveal that domestic workers and sex workers alike 'perform authenticity'. This does not mean that conversations about the 'terms of the contract' of intimate exchange are altogether absent; on the contrary, they are often made explicit at the outset. Nonetheless, in everyday practice, a time-bound kind of 'performance' of authenticity is simultaneously required, a 'pretending to

³⁶ A Araiza Díaz and R González García, 'La Investigación Activista Feminista: Un Diálogo Metodológico Con Los Movimientos Sociales', *Empiria – Revista de Metodología de Ciencias Sociales*, issue 38, 2017, pp. 63–84, <https://doi.org/10.5944/empiria.38.2018.19706>.

want to be there', so to speak (Ninfa, sex worker from Latin America in Spain). Far from being a merely deceptive act, this performance can be understood as a highly skilled and professionally honed form of relational labour.

This delicate balancing act sustains the bodily, affective, and emotional work required in both lines of work, but also produces situations in which the boundaries between desire and obligation, attachment and labour, become blurred. For many of our participants, especially when long-term relationships are in place, it was often difficult to discern whether some of their employers or clients are friends, bosses, or even lovers.

It was not uncommon for participants to report building relationships with clients, sometimes so strong that they 'don't even ask to be paid' (Lisandra, sex worker from Latin America in Spain). As a Latin American migrant, isolated due to the language barrier, her irregular status and involvement in sex work, Jimena provides an example of finding solace in her friendship with a client.

In this line of work, you meet people, people who offer you friendship and want to strengthen those bonds.... I don't have many friends, to be honest.... I have a Maltese friend who helps me a lot and wants me to leave this job. He had never been with an escort before and he told me: 'I was with you, and I felt a very different energy.'

A similar example of these blurred boundaries is illustrated by Jéssica, a Filipino live-in domestic employee residing in Italy, who recounts how the same female employer who made her life miserable with shouting and constant capricious demands is also someone she now misses.

Interviewer: Would you call her a friend or it was just your employer?
Jéssica: Sometimes friend. There are times that we talk as a friend, there are times that... employer. Because when she get sick I take care of her. That's the one that she didn't forget—she can't forget—because when I left her she cried and she thank me for taking care of her. She had the good side also. But, until now, we catch up each other. She cannot forget me.
Interviewer: You get emotional!
Jéssica: Yeah. Though... we had that... though I had a hard time from her, but I still love her as my employer.

The performativity of intimacy in both types of work can also lead some clients or employers to misinterpret or manipulate the terms of the relationship. This can give rise to attempted or actual boundary violation, for example by extending services beyond the originally agreed-upon terms.

For example, I had a client whose apartment—and it wasn't an apartment, it was a mansion.... He must have a lot of money, a lot of money. Luxury cars. I thought, 'This one's going to pay my due', because you see so much luxury and you think, 'He's going to pay... If there's so much luxury, he must have the money to pay... No?'. My payment limit was three hours. 'If you stayed two more hours, it was because you wanted to'. Abhh, imagine how awful that is. – Andrés (sex worker from Latin America in Malta)

As documented elsewhere,³⁷ even when outright abuse does not occur, it is not uncommon for employers or clients to 'overstep' in the attempt to obtain support or intimate connection that goes well beyond the negotiated terms.

Interviewer: If you have to answer [your phone]...
Lucas (sex worker from Latin America in Malta): No, it's a client. [His] brother has died.... He thinks now we are the best friend because we had sex. You know nothing about this shit! I hope he doesn't fall in love, because he suffers.

In our fieldwork, this dynamic appeared in a particularly blurred and emotionally ambiguous form within domestic work—especially in live-in arrangements—where the boundaries between labour, affection, and familial belonging are often rendered deliberately indistinct. In these contexts, the rhetoric of 'being part of the family'³⁸ may foster forms of emotional closeness and mutual dependency that partially obscure the underlying asymmetry of the employment relationship. Yet moments of rupture can suddenly expose the conditional and hierarchical nature of the bond. Carmela, a Latin American domestic employee in Italy, exemplifies this ambiguity. Having worked for several years as a live-in domestic worker for an upper-middle-class family in Rome, she would often join them with her seven-year-old daughter on trips to their holiday home. These shared holidays had contributed to a sense of trust, proximity, and quasi-familial inclusion. However, during one of these trips, an incident involving her daughter profoundly altered Carmela's perception of the relationship and revealed the fragility of the intimacy she believed had been established.

We were at the beach, in the beach area, and when I asked for sunscreen for my daughter, who was little, [employer's name, the mother of the family] replied, 'But you don't get sunburned because you're dark-skinned' as if

³⁷ See e.g. C Milrod and R Weitzer, 'The Intimacy Prism: Emotion Management among the Clients of Escorts', *Men and Masculinities*, vol. 15, issue 5, 2012, pp. 447–467, <https://doi.org/10.1177/1097184x12452148>.

³⁸ Parreñas.

we were dark and the sun couldn't burn us. And of course we did get burned. In fact, my whole back was completely red, right?

Carmela recalls this moment as the tipping point that led her to leave the family. What emerged in that moment was not only a racist remark but also the sudden collapse of the imagined intimacy and familial reciprocity that had structured the relationship until then. A similar example is presented by Jéssica, who reports navigating the emotional weight of preparing to leave her employer. She recounted how she secretly secured a job in Italy while still working for a woman in Singapore (the one she 'loved as her employer'), and how she eventually disclosed this and negotiated her departure from the household.

They called me again that I am the one chosen. So, 'Thank you!' I didn't expect that, that I am the one whom they choose to work for them. So, they started applying my work permit, working visa and everything. It takes only three months. And I didn't talk to my employer that I am applying going to Europe. Surprise! I surprised her. And she scolded me again... I cried so much!

Jéssica's account also illustrates the kinds of affective negotiations that shape domestic employee–employer relationships. These negotiations are ones in which affection becomes both a resource and a constraint, and where loyalty, gratitude, duty, and personal aspiration are woven into a delicate fabric that must be held together without tearing. All stories of our participants, both domestic workers and sex workers, reveal how the emotional bonds cultivated in intimate labour can be both nourishing and quietly suffocating.

Negotiating Boundaries in Contexts of Criminalisation and Migration-related Precarity

Because intimacy is often misinterpreted, and both domestic work and sex work take place against a general backdrop of criminalisation and precarity, migrant workers in both sectors actively resist risk and vulnerability by negotiating boundaries. In the case of sex workers, this negotiation may relate to condom use and client screening via support networks.

Negotiations over condom use were indeed frequent, with some participants ruling out sex without a condom entirely, others charging extra for condomless sex, and others still making choices on a case-by-case basis.

I always use a condom when I give head because I'm not too afraid of giving head without one. Most men don't like it, but if they don't, I always say it's extra. – Jimena

I use condoms for everything, but there's always the client who tells me they don't like condoms. Sometimes I use them, other times ... I don't – Andrés

You have to be very careful... Europeans are very much like, 'who cares, suck it without condoms'. – Policarpa (sex worker from Latin America in Malta)

Across the sample and across countries, there was some evidence of different forms and degrees of collective organisation and mutual support led by sex workers, ranging from small informal networks of solidarity to larger and more structured communities of support, which involved sharing information on dangerous clients or abusive employers. For instance, Angela, a sex worker from Latin America in Malta, spoke of a 'bulky' client, whom she had flagged to other workers as potentially dangerous. Angela's suspicions were confirmed when a transgender worker accepted his request for services and found herself facing serious risks. Angela described how Latin American sex workers living in neighbouring flats in Malta banded together to support her. Although the worker had managed to persuade the client to leave, he unexpectedly returned and tried to forcefully break into her flat.

The door was completely destroyed, it had to be replaced.... In the end the guy left [but then he returned, so] we grabbed some scissors, because he knocked down the door, he was pushing and putting his arm in and when he put his arm in we grabbed him with the scissors, then he started bleeding a lot and left.

Despite this and other examples of community support, most sex workers interviewed—and particularly those with irregular migration status—offered testimonies of self-reliance.³⁹ This coincided with tapping into their personal skills and resources in order to set, re-affirm, or re-negotiate boundaries and protect themselves from risky situations.

I had an experience with a man who, from the moment I walked in, I felt was a bad person. I let him in, and I kept looking at him and thinking 'I don't want to be with this person'. I felt a very, very low energy, and I didn't know how to say anything. I thought 'I'll tell him I'll charge more'. When I bring someone in and I feel like I don't want to be with them anymore, I kind of change the price, and they say, 'Just go!' That's what I do to get rid of them. In the end, I did it, and the guy left really fast.
– Jimena

³⁹ Rossoni and van der Woude.

Irregularity was a key factor impacting workers' confidence in their ability to report client violence to the police and obtain support, as well as their overall feelings of vulnerability.⁴⁰ For example, Andrés recounted an episode where he was physically assaulted by a client who threatened to report him to the police because he was 'illegal'. While he managed to avoid being reported, Andrés felt alone and isolated and was thankful for his physical prowess which allowed him to escape a potentially compromising situation. Aside from the impact of migration laws, particularly in the Maltese case, self-sufficiency among the sex worker community is exacerbated by laws which criminalise sex workers who share dwellings and by the absence of a sex worker collective.⁴¹

In a similar manner, in domestic work, irregular status, in conjunction with live-in arrangements and employer dependency, restrict workers' ability to refuse tasks or set boundaries. However, many still engage in subtle forms of negotiation such as redefining duties, seeking live-out positions, or relying on community networks for support. Research shows that migrant domestic workers frequently experience overwork and sexual harassment but face major obstacles to reporting abuse due to isolation within private households and fear of deportation.⁴²

Jéssica illustrates how affective labour and overwork are deeply entangled in the private arrangements that structure this kind of employment. She recounted how her 'madam' asked her to massage her for hours every day, long into the night, until she felt utterly exhausted but unable to refuse. What began as a gesture of care—expected, yet not formally part of her duties—slowly expanded into an intimate, bodily demand that far exceeded the boundaries of common sense or physical wellbeing. For Jéssica, the lines between professional obligation, emotional loyalty, and bodily availability became blurred, as the intimate proximity characteristic of domestic service created situations where saying 'no' felt almost impossible.

I started by seven. I washed the car in the car washing. After that, I made her coffee. Then, actually, she is not at home the whole day because she has a business. So, I am alone at home doing the household chores. Then, after she comes back, I prepare her food for dinner. After dinner... I believe she finish by nine, eight to nine. After that, I clean the kitchen. After cleaning the kitchen, she wants me to massage her. Like I massage her for

⁴⁰ I Rossoni, 'Crafting vulnerability: Vulnerability (and resistance) among migrants with experiences of sex work in Malta', *European Journal of Criminology*, vol. 23, issue 5, 2026, pp. 813–838, <https://doi.org/10.1177/14773708251400844>.

⁴¹ *Ibid.*

⁴² S Bofill-Poch and R M Porras, 'Indefensión, injusticia y merecimiento en el colectivo de trabajadoras del hogar: análisis de casos judicializados', *Etnográfica – Revista do Centro em Rede de Investigação em Antropologia*, vol. 24, issue 1, 2020, pp. 225–244, <https://doi.org/10.4000/etnografica.8487>.

two hours, three hours... too painful, you know? Until I'm falling asleep also at her back! Oh my God! Sometimes, I do like [movement of massage with minimum care and detail] because I am sleepy. I cannot say, 'Ma'am, enough! I feel asleep.' I cannot say that. Just continue...

In Jéssica's case, a combination of factors—including migratory irregularity, linguistic barriers, social isolation, and dependence on her employer—not only made it difficult to seek institutional support, but also profoundly shaped her capacity to identify whether she was entitled to protection in the first place, or to recognise to what extent the demands imposed by her employer could be considered excessive, illegitimate, or outright abusive. These experiences highlight how intimacy and emotional labour are not fixed but continuously negotiated, staged, and managed every day, reflecting both the structural constraints and the relational strategies embedded in both domestic work and sex work. At the same time, as has been emphasised throughout this section, irregularity is a key factor complicating the possibility of negotiation and even access to support when exploitation or abuse occurs.

Navigating Intimate Spaces

Workers' perceptions of safety intertwine with the ability to appropriate space and exercise control within it. While contemporary urban environments often erode feelings of belonging through mobility, the home—and those spaces one gradually comes to feel 'at home' in—retain symbolic and emotional significance. Yet these spaces are not inherently safe. Unequal power relations with employers or clients and ambiguous intimate encounters can destabilise the sense of protection associated with the domestic sphere. As illustrated in participants' experiences above, the home may become a site where one asserts oneself or, conversely, a locus of vulnerability.

Similarly, the public space, traditionally painted as risky and perilous, can unexpectedly offer spaces for intimacy, which clash with popular understandings of the concept. The possibility of having their own car is essential for many street-based sex workers in securing intimate spaces with clients. Otherwise, they may resort to more secluded locations or improvised set-ups, such as curtains used to enclose a small area. In response to a question on risk in street-based sex work, Antonio, a Southern European sex worker in Malta, spoke of an incident involving a violent client. In doing so, he highlighted the differences between certain public spaces and others, emphasising that paradoxically, although most of his encounters take place at isolated locations, often at night, not all public spaces are the same and some outdoor spots feel safer than indoor arrangements.

While the risk of violence and exploitation impacts many sex workers' decisions over the organisation of intimate spaces, very often feelings of intrusion or violation emerged in connection with less serious incidents, such as sharing a

bed or being exposed to someone's bodily odour.

Interviewer: Do you ever feel unsafe with people coming to your place? Do you think it's safer to have people come to your place than going to their place?

Lucas: No, there is risk. There is a risk, there are a lot of risks.... Here in Malta I had one obese. My God. What the hell was that?! He was like obese frog. He was in my bed, naked, smelling bad. Smelling bad. You don't have idea.

These instances were described in subjective terms by participants, offering a window into individuals' multifaceted understandings of intimacy. Moreover, even in the spatial organisation of the homes where they worked, workers used the arrangement, use, or restriction of space as a way to assert control.

I liked having my own bathroom... some customers had terrible breath! And their feet smelled awful. Many of them appreciated the hygiene... I'd tell them to take their shoes off out here and go to the bathroom, and they'd come back. – Policarpa

For domestic workers entering into their employers' household brings both advantages and disadvantages. Live-in workers often describe it as a necessary step that allows them to save money and avoid exposure to surveillance and harassment in public spaces. At the same time, and differently from independent sex workers, this set-up blurs the boundaries of their availability, leading employers to demand continuous labour, including at night. Having their own room—often the smallest in the house and located next to the children or elders they care for, or in the most remote and unpleasant areas of the home (such as storage rooms)—becomes their only refuge. Several participants reported intrusions into these spaces (e.g. employers entering to 'check' the room out of distrust), which they experienced as violations of their privacy.

This dynamic extends not only to the intimate spaces that live-in domestic employees inhabit or are allowed to inhabit but also to everyday matters such as food and personal hygiene. Amalia, a live-in Southeast Asian domestic worker in her 60s residing in Italy, recounts with astonishment how intensely she had to negotiate her food preferences—particularly her partiality for rice over pasta—with her last employer.

'And you leave me. I have no food. Nowhere to go', I said to her. 'What are you eating? [There is] Many pasta', she said. 'No. I'm eating rice', I said. 'Okay. I'll buy rice'. Then she buy me rice. Only rice! 'How can I eat solo rice?' 'What more?' 'I don't know. Is there a supermarket? I can go and buy for my food...' like that...

As expected, for many of them, transitioning to being live-out domestic workers represents a gain in personal intimacy and space, as well as increased control and autonomy over basic aspects of their lives.

Discussion and Conclusions

Although ‘intimacy’—and the experience of it—is ambivalent in both sectors, clear distinctions between sex work and domestic work emerge from our fieldwork. In contrast with common readings of sex workers which paint them as hapless victims,⁴³ many of our participants spoke of clear, intentional, and assertive boundary-setting and upholding, aligning with other research emphasising the complex ways in which intimacy is performed and negotiated across the sex work sector.⁴⁴ Conversely, our findings in relation to domestic work hint to pervasive nebulousness surrounding boundary-setting, especially under live-in arrangements. Workers are often confused about where intimacy starts and ends, and which services fall within the terms of the employment arrangement and which do not (for example, Jéssica having to massage her employer every night). Codes of what is acceptable or demanding under these intimate arrangements are more blurred, except in cases involving sexualised demands directed at the domestic worker—a situation frequently faced by domestic workers—that clearly violate the normative codes of the sector.

Comparing sex work and domestic work allows us to question and demystify a number of assumptions regarding intimacy in both sectors. For many sex workers, sexual interactions are often routine and emotionally compartmentalised as part of their work. At the same time, intimacy can also emerge unexpectedly in the form of friendship, infatuation, and moments of connection.⁴⁵ Similarly, certain domestic tasks such as cleaning, cooking, or caring for a dependent person can be experienced as forms of love and care, depending on the meaning attached to them, who they are performed for, and with what purpose; but they can also be mechanical and mundane tasks.

Public responses to both sex work and domestic work misunderstand and narrowly define intimacy. In sex work, it is commonly assumed that some sort of intimacy is necessarily present, yet the concept is generally over-simplified to sex—in narrow and generally heteronormative terms—and bodily interaction.

⁴³ K Sparks, ‘Sex Work, the Victim, and the Anti-Trafficking Movement’, in N L Fischer, L Westbrook, and S Seidman (eds.), *Introducing the New Sexuality Studies: Original Essays (4th Edition)*, Routledge, London, 2022.

⁴⁴ Carbonero and Garrido; Alarcón-Medina and Ayala-Constantino.

⁴⁵ H DeLacey and I Rossoni, ‘Beyond “Vanilla” Intimacy: Digital Sex Workers’ Views on Intimacy and Non-Normative Sexual Desires’, *Sexualities*, forthcoming.

Moreover, within neo-abolitionist discourse, this hollowed-out understanding of intimacy, which excludes the experiences of sex workers, is morally condemned and conducive to damning public discourse and treatment. In domestic work, on the other hand, this affective dimension is treated as an implicit requirement of the labour relationship. It is expected that the worker should form some kind of bond with the family, be kind, obedient, and affectionate, especially when caring for dependent people. Just like in sex work, this intimacy is narrowly defined, as it is shaped around the expectations of wealthy employers, without accommodating the voices and lived experiences of domestic workers. However, unlike sex work, the potential ‘profanation’ of intimacy that this commercialisation of care may entail for domestic workers is often left unquestioned.

Our analysis seeks to complicate these binaries by foregrounding that, in both domestic work and sex work, labour relations are deeply shaped by affective dynamics and forms of emotional ambiguity that continuously destabilise the possibility of establishing fixed, stable, and clearly negotiated boundaries of intimacy. There is a considerable heterogeneity of experiences and labour conditions that exist across both sectors. This diversity rarely finds space in public debates, where sex work is often demonised as ‘prostitution’ (regardless of the specific sub-sector and conditions within it), while domestic work often remains socially and politically invisibilised.⁴⁶ Both the sex and domestic sectors witness multiple forms of abuse, as well as pleasure, connection, and learning. Indeed, what we find is that, in both forms of work, migrants’ irregular administrative status is what shapes their capacity to report abuse and violence, change jobs or employers, resist coercion and blackmail, and negotiate boundaries and working conditions. This, in turn, also affects workers’ ability to define and negotiate the limits of the intimacy, emotional involvement, and bodily availability they are willing—or unwilling—to provide within labour relations.

Our research also sheds light on the importance of space in the conceptualisation of intimacy. Public and private spaces, rooms, beds, baths, and kitchens become sites where intimacy is shared, sometimes temporarily co-constructed, or violated. The public sphere, traditionally portrayed as risky and perilous, particularly for women and marginalised workers, may also unexpectedly enable forms of intimacy, care, solidarity, and emotional connection that complicate conventional understandings of where intimacy ‘belongs’. When it is infringed, participants often seek novel spaces to reclaim it.

Despite both sectors being characterised by similarly negotiated and conditional forms of intimacy, they are subject to radically different legal and political treatments across Southern Europe. While sex workers continue to be directly or indirectly criminalised through regulatory frameworks that intensify precarity,

⁴⁶ Aramayona, 2025.

surveillance, and social stigma, domestic work is comparatively institutionalised and actively sustained through regimes of low-paid and weakly protected labour. This contrast is especially significant in countries such as Spain and Italy, which register some of the highest rates of domestic employment in Europe.

In line with arguments advanced by sex worker organisations, we contend that this asymmetry cannot be understood through moral discourses surrounding female sexuality and the historical policing of women's sexual autonomy. It must also be situated within broader political-economic arrangements that rely upon the availability of a feminised and racialised labour force dedicated to sustaining social reproduction and care infrastructures for predominantly white European middle-class households. From this perspective, the differential regulation of sex work and domestic work reveals not simply divergent moral valuations of intimacy, but also the selective legitimisation of forms of feminised labour considered socially necessary to the reproduction of contemporary European welfare and family structures. Moreover, in contexts where discretionality and informality tend to play a more significant role than in other European countries, migrant workers are constantly exposed to ambiguous practices, which often contribute to their marginalisation. Future research should investigate the different forms of discretionality experienced by sex workers in their encounters with the authorities and across public services, the ways they affect various aspects of life, and create both protection challenges and opportunities to sidestep the rules.

Although this article does not specifically focus on unionisation, our broader feminist ethnographic research in Southern Europe also shows that worker-led community organisations—run by sex workers, domestic workers, and migrants—greatly improve workers' awareness of their rights, confidence, and ability to negotiate their working conditions. These groups, which are growing unevenly across Southern Europe, help counter the vulnerabilities built into intimate labour, whereas isolation and limited knowledge of rights expose sex workers and domestic workers to greater insecurity and abuse. Despite national differences, this article highlights a shared need for stronger community organising; for reforms of labour (including sex work) and migration laws and policies to prevent migrant workers' marginalisation; and for a research agenda that analyses domestic and sex work together rather than in silos.

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Between Appreciation and Exploitation: Employer perceptions, attitudes, and household dynamics in Hong Kong's domestic work sector

Isla Mairi Wilson and Yuniar Paramita Sari

Abstract

Migrant domestic workers (MDWs) are essential to Hong Kong's care economy yet remain structurally vulnerable to exploitation. While existing research has focused primarily on workers' experiences, less attention has been paid to employers' attitudes and practices and how they shape employment. Drawing on an intersectional framework, this article examines how gendered, racialised, and migrant inequalities shape employers' attitudes towards MDWs and their engagement in exploitative practices. Based on 306 surveys and 15 semi-structured interviews with employers of MDW, we find that exploitative practices are associated with prejudicial, exclusionary, and controlling employer attitudes, revealing how racialised perceptions and restrictive migration regimes are translated into everyday practices of subordination. We demonstrate that exploitation frequently coexists with appreciation, gratitude, and dependence on caring labour, challenging assumptions that positive interpersonal relationships protect workers from exploitation. These findings contribute to debates on care work, intimate labour, and exploitation by showing how domestic work blurs boundaries between work and private life and how emotional intimacy and familial appreciation can coexist with structural inequality and control over workers' autonomy. Exploitation is further shaped by gendered power relations, care responsibilities, economic pressures and household circumstances, highlighting how exploitation and care work are embedded within wider social and structural inequalities.

Keywords: migrant domestic workers, care work, employers, exploitation, attitudes, perceptions, Hong Kong

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Introduction

Migrant domestic workers (MDWs) have played an essential role in sustaining households in the Hong Kong Special Administrative Region of the People's Republic of China (hereafter: Hong Kong) since the 1970s, providing childcare, elder care, and household labour, and enabling local families, particularly dual-income and middle-class households, to maintain their livelihoods.¹ Despite their indispensable contributions to Hong Kong's social and economic functioning, MDWs remain structurally marginalised and excluded from full labour protections.² Existing research consistently documents their vulnerability to exploitation, stemming from an intersection of restrictive immigration policies, mandatory live-in requirements,³ weak enforcement of labour standards, and a long history of racialised and gendered stereotypes surrounding domestic work.⁴ These conditions create environments in which excessive overtime, surveillance, wage deductions, and limitations on freedom of movement are normalised, and where risks of forced labour, abuse, and rights violations remain deeply entrenched.⁵

While the vulnerabilities of MDWs are well established, far less is known about the attitudes and perceptions of employers. Yet these individuals directly shape the workers' experiences within the household. Public attitudes towards migrant workers in Asian contexts are often marked by mistrust, stereotypes, and perceptions of cultural threat, which can translate into discriminatory behaviour and harmful labour practices.⁶ In Hong Kong specifically, portrayals of MDWs continue to draw from historical notions of servitude and hierarchies related to

¹ T S Sumerlin, J H Kim, and R Y Chung, 'Female migrant domestic worker experiences during the COVID-19 pandemic in Hong Kong: A qualitative study', *PLOS Global Public Health*, vol. 5, no. 11, 2025, pp. e0005399, <https://doi.org/10.1371/journal.pgph.0005399>.

² J Ho and A Sewell, 'Exploring mediated representations of migrant domestic workers in the Chinese-language media in Hong Kong', *Ethnicities*, vol. 23, issue 6, 2023, pp. 931–961, <https://doi.org/10.1177/14687968231164721>.

³ Under a mandatory Condition of Stay imposed by the Hong Kong Immigration Department, all foreign domestic helpers must live and work at their employers' residence as stated in the Standard Employment Contract (SEC), a requirement that has been in effect since 1 April 2003.

⁴ S J Tan, 'When the Home Is Also the Workplace: Women migrant domestic workers' experiences with the "live-in" policy in Singapore and Hong Kong', *Anti-Trafficking Review*, issue 20, 2023, pp. 75–91, <https://doi.org/10.14197/atr.201223205>.

⁵ Y P Sari and I Wilson, *Invisible Struggles: Challenges and Support Seeking Behaviours of Indonesian Domestic Workers in Hong Kong*, Migrasia, Hong Kong, 2025.

⁶ D Lindgren *et al.*, *Public attitudes towards migrant workers in Japan, Malaysia, Singapore, and Thailand*, ILO, Bangkok, 2019.

race, class, and nationality.⁷ These social narratives influence not only societal discussions but also employers' expectations and treatment of the workers they hire. Understanding employer attitudes is essential in explaining why exploitative conditions persist despite existing legal frameworks and contractual obligations. Yet empirical research on employers' perspectives remains limited in Hong Kong. This article addresses this gap by examining how employers perceive and interact with MDWs, and how their attitudes shape employment practices, conflict dynamics, and exploitative behaviour. Drawing on a mixed-methods design, we integrate findings from a survey of 306 employers and 15 semi-structured interviews to explore how employer attitudes and broader structural influences, such as economic pressures, gender roles, and social norms, shape the treatment of domestic workers.

We find that employers reporting exploitative practices are more likely to hold prejudicial, exclusionary, and controlling attitudes towards MDWs, demonstrating that negative perceptions contribute to exploitative behaviour. Further, restrictive migration governance frameworks and racialised perceptions of MDWs are reflected in societal attitudes and translated into everyday practices of control, exclusion, and discipline within households. MDWs' experiences are shaped by overlapping forms of disadvantage that place them in structurally unequal relationships with employers, reinforcing their vulnerability to labour exploitation.⁸ Exploitation is also associated with broader structural pressures, including gendered power relations, care responsibilities, economic strain, and household circumstances. We demonstrate that financial pressures are linked to exploitation, with higher rates reported among middle-income households, those with elder care responsibilities, and those living in smaller homes. Female employers reported greater appreciation for MDWs and lower rates of severe exploitation, suggesting that gendered experiences of care shape perceptions and treatment of workers. Recognition of MDWs' contributions and positive perceptions coexisted with expectations of obedience, restrictions on autonomy, and exploitative practices, challenging the assumption that positive interpersonal relationships protect against exploitation, and revealing how appreciation and control interact in employment relationships. We demonstrate that prejudicial views towards MDWs relate directly to exploitative treatment but coexist with a dependence on caring labour and even gratitude, while being underpinned by employers' control over workers' personal autonomy. This complex mix of familial appreciation, exploitation, and control shows domestic work as a form of intimate labour, which blurs the boundaries between employment and private life, such that emotional intimacy and structural

⁷ A Hn Chan, 'Live-in foreign domestic workers and their impact on Hong Kong's middle class families', *Journal of Family and Economic Issues*, vol. 26, issue 4, 2005, pp. 509–528, <https://doi.org/10.1007/s10834-005-7847-4>.

⁸ K Crenshaw, 'Demarginalizing the Intersection of Race and Sex: A Black Feminist Critique of Antidiscrimination Doctrine, Feminist Theory, and Antiracist Politics', *University of Chicago Legal Forum*, vol. 1989, no. 1, 1989, pp. 139–167.

inequality coexist. Our findings have important implications for labour policy, rights-based reforms, employer education, and broader efforts to challenge the social norms and structural conditions that sustain exploitative labour relations.

Vulnerabilities of Migrant Domestic Workers in Hong Kong

Since the 1970s, residents of Hong Kong have been hiring MDWs to assist with caregiving, cooking, and household labour.⁹ MDWs play a vital role in supporting households yet are often undervalued and viewed as outsiders. Despite their substantial contributions to the city's economy, they remain excluded from full economic rights and permanent residence.¹⁰ Their informal, private, and underregulated workplace renders them vulnerable to exploitation and abuse.¹¹ The legal requirement that MDWs live in their employers' home exposes migrant workers to forced overtime, inappropriate accommodation, lack of rest days, insufficient food, and lack of privacy.¹² The conflation of housekeeping and caring labour further puts them at higher risk of excessive overtime and exploitation.¹³

Although Hong Kong provides MDWs with a standard employment contract, minimum wage, weekly rest day, and employment protections, structural vulnerabilities remain. The minimum allowable wage is below the statutory minimum wage, and the absence of limits on working hours exposes workers to excessive overtime.¹⁴ Despite legal restrictions on wage deductions, some MDWs continue to report salary withholding and debt bondage.¹⁵ It is well evidenced that women, who make up the majority of MDWs, are also at increased risk for sexual

⁹ Ho and Sewell.

¹⁰ I D Lui *et al.*, “‘We also deserve help during the pandemic’: The effect of the COVID-19 pandemic on foreign domestic workers in Hong Kong”, *Journal of Migration and Health*, vol. 3, 2021, pp. 100037, <https://doi.org/10.1016/j.jmh.2021.100037>.

¹¹ A Sim, ‘Organising Discontent: NGOs for Southeast Asian Migrant Workers in Hong Kong’, *Asian Journal of Social Science*, vol. 31, issue 3, 2003, pp. 478–510, <https://doi.org/10.1163/156853103322895351>.

¹² Justice Centre Hong Kong, *Coming Clean: The Prevalence of Forced Labour and Human Trafficking for the Purpose of Forced Labour amongst Migrant Domestic Workers in Hong Kong*, Justice Centre, Hong Kong, 2016.

¹³ M Amrith, *The Invisible Labour of Female Migrants in the Care Sector*, UNU-GCM, Barcelona, 2015.

¹⁴ C Liang, ‘Maid in Hong Kong: Protecting foreign domestic workers’, Migration Policy Institute, 20 October 2016, retrieved 11 July 2026, <https://www.migrationpolicy.org/article/maid-hong-kong-protecting-foreign-domestic-workers>.

¹⁵ I Huynh *et al.*, *Overview of International Migrant Workers in the Care, Hospitality, and Entertainment and Informal Economy Sectors in Hong Kong SAR, China*, International Organization for Migration, Hong Kong SAR, China, 2023.

harassment, gender-based violence, and abuse, particularly in isolated, home-based working environments.¹⁶ Intersecting inequalities linked to immigration status, ethnicity, gender, and live-in requirements have also been consistently identified—in research in Hong Kong and other jurisdictions—as restricting access to justice. These vulnerabilities are reinforced by tied visa arrangements that link workers’ immigration status to a specific employer.¹⁷ The ‘two-week rule’ further limits workers’ ability to leave abusive employment, as failure to secure a new employer within two weeks may result in deportation.¹⁸

It is important to distinguish between systemic, state-enabled forms of labour exploitation and the legal category of forced labour. Although these conditions create vulnerability and unequal power relations, they do not necessarily meet the legal definition of forced labour, which requires involuntariness and the menace of penalty.¹⁹ As Quirk, Robinson, and Thibos argue, an exclusive focus on trafficking and forced labour obscures the broader systems and labour arrangements that generate exploitation.²⁰ Accordingly, we conceptualise exploitation as a continuum rather than a binary condition, recognising that MDWs may experience everyday forms of control and constrained autonomy arising from structural arrangements, including migration policies, employer dependency, and live-in requirements, which normalise exploitative practices and create conditions in which more severe forms of coercion can occur.²¹ This article, therefore, is not concerned with forced labour specifically but instead examines forced labour indicators defined by the International Labour Organization (ILO), including restriction of movement, intimidation and threats, physical violence, retention of documents, abusive working and living conditions, and excessive working hours, as indicators of severe exploitation and psychological coercion.

¹⁶ Amrith.

¹⁷ S Kouba and N Baruah, *Access to the labour market for admitted migrant workers in Asia and related corridors*, International Labour Organization, Bangkok, 2019.

¹⁸ Amrith.

¹⁹ The definition of forced labour, as established in the ILO *Forced Labour Convention*, 1930 (No. 29) is ‘all work or service which is exacted from any person under the threat of a penalty and for which the person has not offered himself or herself voluntarily.’

²⁰ J Quirk, C Robinson, and C Thibos, ‘Editorial: From Exceptional Cases to Everyday Abuses: Labour exploitation in the global economy’, *Anti-Trafficking Review*, issue 15, 2020, pp. 1–19, <https://doi.org/10.14197/atr.201220151>.

²¹ K Skrivankova, *Between decent work and forced labour: Examining the continuum of exploitation*, Joseph Rowntree Foundation, 2010.

Public Perceptions Towards Migrant Domestic Workers

Attitudes towards immigrants and immigration are an important indicator of the experiences of and responses to migrant workers in society.²² Research shows that the public generally holds negative attitudes towards migration and migrant workers, even though there is a strong demand for ‘low-skilled’ workers in destination countries.²³ For example, in some Asian countries, such as Malaysia, Singapore, Japan, Thailand, and China, public opinion often portrays migrant workers as more prone to criminality than the general population, depicting them as troublemakers and characterising them as uneducated, ignorant, unkempt, and socially undesirable.²⁴ An ILO study in 2019 found that the presence of migrant workers can be perceived to threaten a country’s culture and heritage to varying but high degrees, for example, in Malaysia (68% of respondents), Thailand (58%), Singapore (53%), and Japan (41%).²⁵ Similarly, separate research in Singapore reported that migrant workers are perceived by citizens as a ‘blight’ on the country’s pristine image.²⁶ Such attitudes have a range of consequences, including discrimination, exploitation, and even violence against migrant workers,²⁷ impacting migrants’ reception in host countries²⁸ and enabling stricter labour migration policies.²⁹ At the same time, these views often negate or neglect the significant positive contributions migrant workers make to their host economies and societies.³⁰

MDWs make up about 4 per cent of Hong Kong’s total population, with the majority coming from Indonesia and the Philippines. Research indicates that while their migration leads to an increase in earning power, this is often offset by a loss in racial and class status.³¹ Public sentiment ascribes MDWs both positive

²² R K Kawasaki and Y Ikeda, ‘Network analysis of attitudes towards immigrants in Asia’, *Applied Network Science*, vol. 5, issue 1, 2020, art. 85, <https://doi.org/10.1007/s41109-020-00315-w>.

²³ M Tunon and N Baruah, ‘Public attitudes towards migrant workers in Asia’, *Migration and Development*, vol. 1, issue 1, 2012, pp. 149–162, <https://doi.org/10.1080/21632324.2012.718524>.

²⁴ *Ibid.*

²⁵ *Ibid.*

²⁶ N P Siang, ‘Inequality in Equality: The Plight of Migrant Workers in Singapore’, *Pioneer Road: Journal of Undergraduate Research*, 2021, pp. 34–38.

²⁷ *Ibid.*

²⁸ Kawasaki and Ikeda.

²⁹ Lindgren *et al.*

³⁰ *Ibid.*

³¹ H J Ladegaard, ‘Demonising the cultural Other: Legitimising dehumanisation of foreign domestic helpers in the Hong Kong press’, *Discourse, Context & Media*, vol. 2, issue 3, 2013, pp. 131–140, <https://doi.org/10.1016/j.dcm.2013.06.002>.

and negative attributes. They are positively portrayed as hardworking, family-oriented women who have made significant sacrifices for the benefit of Hong Kong society. On the other hand, negative portrayals depict them as greedy, uncaring, and unappreciative of the opportunities available to them in Hong Kong.³² Prior studies document that MDWs are widely perceived as dependent, poor, and vulnerable.³³

Palmer describes how stereotypes of Indonesian MDWs in Hong Kong are reinforced by employment agencies, employers, and government officials. Indonesian workers are often portrayed as more ‘flexible’ and compliant, shaping employer expectations around long working hours and obedience. Government officials in Hong Kong mostly encounter Indonesian MDWs in relation to labour, immigration, and criminal complaints as well as concerns reported by employers, likely shaping attitudes and reinforcing stereotypes.³⁴ Indonesian MDWs have also been described as Hong Kong’s most ‘isolated and exploited’ minority.³⁵ By contrast, Filipinas are frequently viewed with suspicion, assumed to be seeking relationships to secure financial stability, and stereotyped as flirtatious or promiscuous. They are frequently placed in a morally questionable category and associated with sex workers.³⁶ One study found that Chinese students in Hong Kong characterised Filipina MDWs as ‘noisy’, ‘unfriendly’, and ‘cunning’, and as thieves and cheaters.

Race and lower socio-economic status seem to be a frequent basis for casual discrimination and prejudice.³⁷ Social exclusion and stigmatisation of MDWs has arguably been driven by bigotry and a societal need to maintain an ‘ideological system of discrimination’.³⁸ Societal exclusion is reinforced by differing regulations

³² D Pascoe and J Tomassetti, ‘Judicial attitudes towards foreign domestic helpers in the Hong Kong criminal courts’, *Asia Pacific Law Review*, vol. 32, issue 1, 2024, pp. 123–148 <https://doi.org/10.1080/10192557.2023.2285531>.

³³ H J Ladegaard, *The discourse of powerlessness and repression: Life stories of domestic migrant workers in Hong Kong*, Routledge, Abingdon, 2016.

³⁴ W Palmer, ‘International migration and stereotype formation: Indonesian migrants in Hong Kong’, *Journal of International Migration and Integration*, vol. 21, issue 3, 2020, pp. 731–744, <https://doi.org/10.1007/s12134-019-00680-1>.

³⁵ Pascoe and Tomassetti.

³⁶ K A Chang and L H M Ling, ‘Globalization and its intimate other: Filipina domestic workers in Hong Kong’, in M H Marchand and A S Runyan (eds.), *Gender and global restructuring: Sightings, sites and resistances*, Routledge, Abingdon, 2010, pp. 60–77.

³⁷ R M-k Chu, ‘More than gratitude, Hong Kong’s foreign domestic workers are due respect’, *South China Morning Post*, 16 June 2011, retrieved 27 August 2026, <https://www.scmp.com/comment/opinion/article/3137306/more-gratitude-hong-kongs-foreign-domestic-workers-are-due-respect>.

³⁸ Ho and Sewell.

governing the legal and employment status of MDWs, such as visas being tied to employers, which contributes to unequal power distribution between workers and employers. Our research sought to understand how these structural factors and prejudices are reflected in employer attitudes and the effect that discriminatory attitudes have on the treatment of MDWs in the workplace.

Methods

Our study utilised a multi-method approach, encompassing primary and secondary data collection. Primary data collection was mixed-method, comprising a survey and semi-structured interviews with employers, which complemented the literature review. We obtained ethics approval from the University of Hong Kong Human Research Ethics Committee (HREC) (Reference Number: EA240542) to conduct both stages of this research.

Survey of Employers of Migrant Domestic Workers

To understand the perceptions and attitudes of MDW employers in Hong Kong, surveys were conducted with 306 MDW employers. A simple random sampling approach was used to identify employers for inclusion within the survey, via Foreign Domestic Helper (FDH) employment agencies in Hong Kong. The sampling frame was a comprehensive list of 1,694 employment agencies, from which a random sample of 500 was drawn. The large sample was drawn to accommodate a higher refusal rate, which was expected. The research team contacted all 500 employment agencies by phone to ask them to distribute the 15-minute online survey. Of the randomised sample, enumerators were able to reach 45% ($n=223$) of employment agencies by phone. Of those, 6% ($n=14$) agreed to participate, 30% ($n=67$) were unsure, and 64% ($n=142$) refused. Enumerators worked on refusal conversion by contacting employment agencies that refused by email. They conducted in-person visits to provide more information to all employment agencies that were unsure. An additional 8 employment agencies were recruited this way, resulting in a total of 10% ($n=22$) of reached employment agencies agreeing to participate; this enabled the research team to recruit 306 employers. To facilitate recruitment, participants who completed the 15-minute online survey received HKD 100 (approximately USD 12.75) as compensation for their time and effort. Because the employer participants were not from disadvantaged or otherwise vulnerable populations, we considered these incentives to be appropriate compensation rather than coercive. Cash payments were provided instead of vouchers because they were easier to transfer remotely, as all data collection was conducted without face-to-face contact. All surveys were available in both English and Cantonese.

Semi-structured Interviews with Employers of Migrant Domestic Workers

A purposive sampling approach was utilised to select participants for semi-structured interviews. At the conclusion of the survey, respondents were asked whether they consented to being contacted for a follow-up interview. Because survey responses were reviewed to identify participants with differing attitudes and reported practices towards MDWs, survey data were not fully anonymised during the recruitment stage. Rather, survey responses were linked to respondents' contact information for the limited purpose of participant selection and follow-up. Following recruitment, identifying information was removed from interview transcripts, and reporting and contact information were stored separately from research data to protect participants' confidentiality. In total, 15 employers were selected from the survey sample for semi-structured interviews. Participants representing a range of perspectives were intentionally recruited—including those reporting predominantly positive attitudes and employment practices as well as those reporting exclusionary attitudes, exploitative practices, and violence—to facilitate comparison across groups. Semi-structured interviews, lasting approximately one hour, were conducted via Zoom in English and Cantonese. Participants received HKD 200 in recognition of their time.

Sample

The majority of surveyed employers (72.9%) were 30–49 years of age. There was a pronounced gender imbalance among the sample of employers, with women constituting 71.6% of survey respondents compared to just 24.8% men and 1% non-binary people.³⁹ In terms of employment status, most participants reported being company employees working for others (52.9%), while smaller segments were employers (15%) or self-employed (14.7%). Hong Kong nationals comprised the majority (61.1%) of participants, with other significant groups coming from India (6.9%), the United Kingdom (6.2%), and Australia (5.2%). The education level of survey respondents was notably high: 79.8% held tertiary qualifications, with 42.2% holding bachelor's degrees and 37.6% holding postgraduate or higher degrees. Income distribution skewed towards high-income employers, with the largest proportion (24.8%) reporting a monthly household income of HKD 200,000–500,000 (USD 25,500–63,750) or more, followed by HKD 60,000–99,999 (USD 7,650–12,750) (23.5%).

Data Analysis

For survey data, descriptive and bivariate analyses were conducted to provide an overview of employers, including key demographics and group differences by income, gender, and nationality. Differences between employers who reported

³⁹ The remaining 2.6% of respondents selected the option 'Prefer not to say'.

more ethical behaviour and those who reported exploitative and violent behaviour were considered in the analysis. The analysis provided an overview of employer demographics, migrant sentiment, attitudes towards their domestic workers, employment practices, conflict management, violence, challenges, and barriers. We adopted Braun and Clarke's method for conducting thematic analysis,⁴⁰ which includes familiarising with the data; developing an initial list of codes; finding, reviewing, and defining key themes; and writing up the findings.

Challenges and Limitations

Challenges of the study included securing honest responses from employers, particularly regarding sensitive questions. To mitigate this, we included a data quality measure in the survey to monitor random responses and invited survey respondents to participate in follow-up interviews. We faced challenges recruiting employers who reported violence for semi-structured interviews. For those we did recruit, enumerators were trained to use probing questions to encourage employers to share freely. Despite this, exploitation and violence were likely still under-reported.

Ethical Considerations and Risk Mitigation Measures

This research was high-risk in nature because it involved interviewing employers about their perceptions and treatment of MDWs. Participants could disclose behaviours that contravene employment laws or ethical standards, creating legal, reputational, and confidentiality risks. There was also a risk that breaches of confidentiality could have adverse consequences for both participants and the MDWs discussed during the interviews. In addition, the research posed risks to the researchers, including potential psychological distress from hearing accounts of exploitation or abuse. These factors presented ethical challenges relating to participant confidentiality, data security, researcher well-being, and the management of disclosures of potentially illegal or harmful conduct.

Accordingly, a range of measures were implemented to minimise risks and ensure the ethical conduct of the study. Interview questions were designed to explore attitudes and experiences rather than investigate specific incidents, and they were framed to minimise the collection of unnecessary identifying information regarding specific workers, households, or incidents. Particular attention was paid to protecting the privacy of MDWs discussed during interviews; their names or other direct identifiers were not recorded.

⁴⁰ V Braun and V Clarke, 'Using Thematic Analysis in Psychology', *Qualitative Research in Psychology*, vol. 3, issue 2, 2006, pp. 77–101, <https://doi.org/10.1191/1478088706qp0630a>.

Given the sensitive nature of discussions, questions were designed to focus on participants' experiences, perspectives, and decision-making processes without encouraging discriminatory or harmful statements. To mitigate the risks of participants feeling judged or becoming defensive, they were advised that some questions might cause discomfort and were reminded that they could decline to answer any question or discontinue participation at any time without consequence.

Enumerators received training in conducting sensitive interviews; responding to participant distress; maintaining neutrality; avoiding collecting information that could increase legal, reputational, or privacy risks; and managing disclosures of exploitation or violence. To protect their well-being, researchers also participated in regular debriefings and supervisions following interviews involving sensitive content, and mental health support services were available in cases of psychological distress.

Survey responses and phone numbers were linked only for the limited purpose of participant selection and follow-up. Confidentiality was assured by storing contact information separately from research data, which were de-identified for analysis and reporting. All data were securely stored and accessed only by authorised members of the research team and removed once recruitment was complete in accordance with institutional ethical guidelines.

Informed consent was obtained before the survey and interviews to ensure that research participants understood the study context; had access to relevant resources and information; participated voluntarily; and were aware that if they were interested in participating in an interview, their survey data would not be immediately de-identified to enable the research team to explore their responses.

Findings and Discussion

Reports of Exploitation and Psychological Aggression Among Employers

To compare the characteristics, perceptions, and attitudes of employers against their reported treatment of MDWs, employers were grouped into three categories during the analysis: (1) employers reporting severe exploitation; (2) employers reporting psychological aggression or non-violent punishment; and (3) employers reporting neither severe exploitation nor psychological aggression/non-violent punishment.

Severe exploitation included indicators of violence derived from Straus's Conflict Tactics Scale, alongside severe administrative exploitation consistent with the ILO framework on forced labour.⁴¹ These included self-reported threats, confiscation of mobile phones or passports, denial of rest days, requiring workers to sleep in communal spaces, restrictions on freedom of movement, and physical violence (slapping, punching, kicking, beating, hitting with an object, throwing objects, pushing, grabbing, or shoving). Psychological aggression or non-violent punishment included shouting, salary deductions, and imposed longer working hours in response to conflict.⁴² Figure 1 presents the disaggregated indicators of exploitation. Categories were not mutually exclusive, as some employers reported multiple types of exploitative behaviours. Severe exploitation was reported by 25% of employers, psychological aggression or non-violent punishment by 46%, and neither form of exploitation by 49%. The disaggregated categories will clarify how exploitation relates to employer attitudes throughout the analysis.

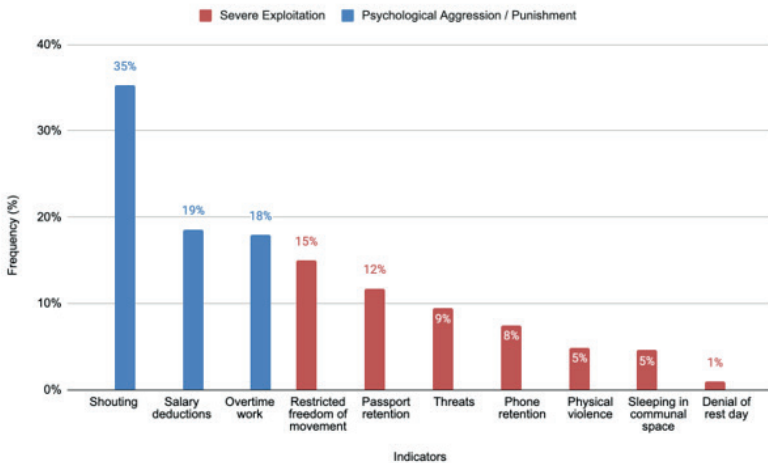


Figure 1: Indicators of severe exploitation and psychological aggression/punishment as reported by employers (%)

⁴¹ M A Straus, *Conflict Tactics Scales (CTS)* [Database record], APA PsycTests, 1979, <https://doi.org/10.1037/t02125-000>.

⁴² For the purposes of this analysis, salary deductions and overtime work are not classified as severe administrative forms of exploitation, as Hong Kong law permits wage deductions under specific circumstances (e.g. damage to property) and does not impose statutory limits on the working hours of domestic workers beyond the mandatory weekly rest day.

Demographic Characteristics of Employers Reporting Exploitation and Psychological Aggression

There is a notable gap in the literature documenting the demographic profile of employers who engage in exploitative practices. By shedding light on their characteristics, our study offers novel insights into the demographics of employers who resort to exploitation or aggression, providing crucial data for prevention and behaviour-change interventions.

Gender and Exploitation

Men were more likely to engage in severe exploitation and impose restrictions as compared to women. While only a minority of our sample were male (24.8%), they represented a larger proportion of employers reporting severe exploitation (35%) but were only marginally more likely to report psychological aggression/non-violent punishment (26%). Specifically, men were 13% more likely to report restricting MDWs from leaving the house and 11% more likely to report verbal abuse. They were also roughly 7% more likely than women to report confiscation of mobile phones, retention of passports, and asking MDWs to work longer hours. Men were marginally more likely to report instances of threats, slapping, punching, kicking, or throwing objects; however, these differences fall within the margin of error and are likely not statistically significant. The findings support existing research suggesting that exploitative practices are shaped by gendered understandings of authority and labour relations. Male employers may be more likely to view domestic work through a hierarchical rather than relational lens, which increases the likelihood of restrictive and controlling practices in employment.

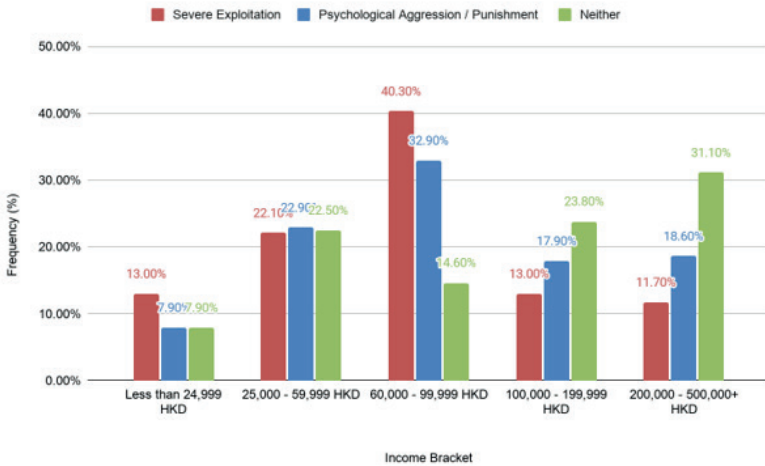
Nationality and Exploitation

Employers reporting severe exploitation were more likely to be Hong Kong citizens (79%). Employers of Indian origin were also marginally more likely to report severe exploitation as well as psychological aggression. Employers reporting severe exploitation were 15% more likely to employ Indonesian domestic workers, supporting existing evidence that Indonesian workers may be more vulnerable to exploitation and perceived as more obedient by exploitative employers. This finding suggests that employer practices may be shaped by racialised and nationality-based assumptions regarding workers' obedience and bargaining power.

Income, Education, Household Characteristics, and Exploitation

Most employers reporting severe exploitation were employees (54.5%) who held a bachelor's degree as their highest qualification. Findings indicate that middle-income households were more likely to report severe exploitation and psychological aggression or non-violent punishment. Although they represented

only a quarter of the sample, middle-income households accounted for 40% of those reporting severe exploitation and 32% of those reporting psychological aggression (Figure 2).



*1 USD = 7.84 HKD (as of 24 June 2026)

Figure 2. Employers reporting exploitation by income bracket (%)

Low-middle-income households were the second most likely to report both severe exploitation and psychological aggression. By contrast, higher-income households represented nearly 40% of the sample but only 24% of severe exploitation cases. Employers reporting severe exploitation also tended to live in smaller apartments, with 80% residing in homes under 100 sq m (1,075 sq ft), compared with 60% of other employers. Smaller living spaces may place additional strain on relationships with live-in domestic workers, increasing the potential for conflict. Exploitation, therefore, appears to be associated not only with employer attitudes but also with the economic and material pressures of managing care responsibilities within constrained household environments. Households reporting exploitation were also significantly more likely to include elderly members (47% compared with 20% of other households), suggesting that households with care responsibilities may place greater demands on domestic workers while also being dependent on their labour. This finding highlights the intersection between intimate care labour and exploitation.

Taken together, these findings suggest that exploitative practices are in part shaped by the interaction of gendered power relations, care responsibilities, household pressures, economic strain, and broader social hierarchies. These structural factors determine and reinforce power relations and MDW treatment within the intimate setting of the household.

*Employer Perceptions of Migrant Domestic Workers*MDWs as Essential to Hong Kong's Economy and Society

To measure employers' views of MDWs, a perception scale was included in the survey. The scale was informed by the validated Positive and Negative Perception of Immigrants Scale (PANPIS) to measure immigrant sentiment,⁴³ with questions adapted to the local context. Most employers saw MDWs as valuable to Hong Kong society, with 75% reporting that they 'allowed families in Hong Kong to thrive and advance in their careers', and that 'they take good care of children and the elderly'. A majority also felt that 'MDWs add to the cultural diversity of Hong Kong' (69%). The data indicated some gendered differences in perceptions, with women reporting stronger positive sentiment towards MDWs. Women were also more likely than men to strongly agree that MDWs allow families in Hong Kong to thrive, allow parents to advance in their careers, and take good care of children and elderly people.

During interviews, employers described the contributions that MDWs made to their lives. Six employers noted that their presence eased the burden on families, providing opportunities for locals, particularly women, to pursue careers and increase household income.

I think foreign domestic helpers are a necessity for many families. They are essential and play an important role. Without them, you might have hundreds of thousands of families with only one person able to work.
(Interview #7)

The findings further emphasise the importance of a gendered analysis, as employers recognise that MDWs play a critical role in redistributing unpaid care labour within Hong Kong households, enabling local women to participate in the labour market. Higher rates of female appreciation for MDWs may reflect that caregiving responsibilities would otherwise fall disproportionately on them. Such assertions reaffirm that Hong Kong's economic model and care infrastructure are heavily dependent on migrant domestic workers. Employers' recognition of MDWs as indispensable to household functioning reflects a broader structural dependence on migrant labour, making them central to both household well-being and broader patterns of economic productivity.

⁴³ A Panno *et al.*, 'A measure of positive and negative perception of migration: Development and psychometric properties of the *Positive and Negative Perception of Immigrants Scale* (PANPIS)', *Analyses of Social Issues and Public Policy*, vol. 23, issue 1, 2023, pp. 73–105, <https://doi.org/10.1111/asap.12338>.

Some employers reported that MDWs are an integral part of Hong Kong society, noting, ‘They are somewhat part of the community, and we might view them as half Hong Kong residents.’ These positive perceptions provide a counterpoint to the stereotypes documented by Ho and Sewell, who identified negative characterisations of MDWs in Hong Kong as ‘personal possessions’ or ‘lowly maids’, identifying the commodification of MDWs as symbols of status and wealth.⁴⁴ Our findings instead suggest there is widespread recognition and appreciation for their essential role in society, reinforcing their unique position between employment and family life and in the provision of intimate care and relational labour within private households.

Concerns Around Resource Sharing, Finances, and Income

The findings suggest that exploitative employers were more likely to perceive financial strain and express restrictive attitudes towards resource sharing. As elaborated by Tan, many employers consider hiring MDWs as financially burdensome because of the high employment-related expenses. This financial strain is further exacerbated when a domestic worker becomes pregnant or unexpectedly terminates her contract, as employers must bear additional costs that create significant financial stress. However, many employers cannot avoid hiring MDWs because alternative childcare arrangements would be even more expensive.⁴⁵

Employers reporting both severe exploitation and psychological aggression were nearly twice as likely to oppose minimum wage increases for MDWs, when compared with other employers (Figure 3). This attitude reflects broader exclusionary social practices documented in the literature, such as MDWs being excluded from minimum wage provisions.⁴⁶ The findings suggest that dominant understandings of MDWs as domestic helpers rather than rights-bearing workers contribute to the normalisation of unequal treatment and diminished recognition of rights and workplace harms. The study demonstrates how social perceptions of domestic work shape understandings of deservingness and acceptable treatment, influencing employer behaviour and broader societal responses to exploitation. Support for wage increases among some employers, however, suggests a nuanced picture, demonstrating that a sizable proportion of employers recognise wage inequality in Hong Kong society.

⁴⁴ Ho and Sewell.

⁴⁵ S J Tan, *Gendered Labour, Everyday Security and Migration: An Examination of Domestic Work and Domestic Workers’ Experiences in Singapore and Hong Kong*, Routledge, Abingdon, 2022.

⁴⁶ Liang.

Furthermore, 27% of employers disagreed that MDWs should have access to the same social services as residents, and 21% did not think they should have the same opportunities. These exclusionary attitudes were significantly more common among employers reporting exploitation and psychological aggression. Employers reporting severe exploitation were twice as likely (40%) to oppose equal access to social services and were also significantly more likely to view MDWs as imposing economic costs through higher taxation (Figure 3).

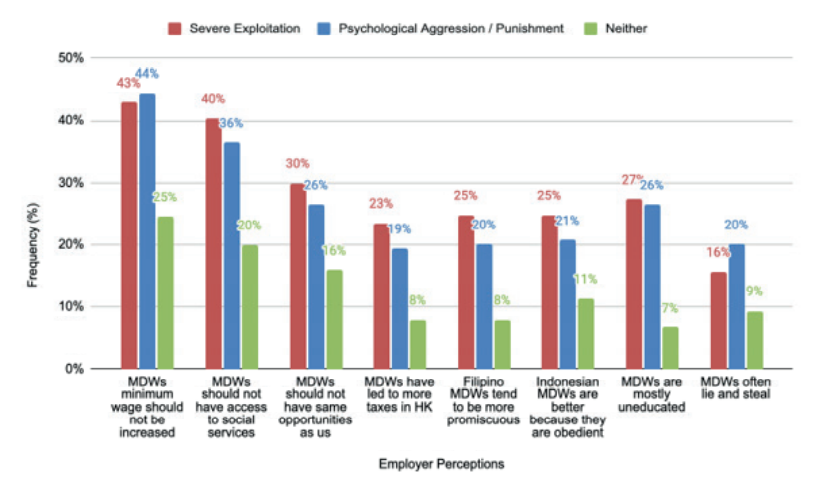


Figure 3. Employer perceptions disaggregated by reported exploitation (%)

The findings indicate that exploitative employers and those with more aggressive management styles are more likely to be concerned that MDWs contribute to resource scarcity in Hong Kong, demonstrating how negative perceptions of MDWs’ societal impact correlate with discriminatory employment practices.

Qualitative data reveal that some employers considered domestic workers a drain on financial resources, in part because they send remittances home and do not contribute to local taxation. As discussed, the minimum allowable wage for domestic workers is significantly lower than that of the general population, estimated at HKD 13–21 (USD 1.66–2.68) per hour, compared to the local minimum wage of HKD 40 (USD 5.10) per hour.⁴⁷ Most MDWs in fact do not pay salaries tax in Hong Kong because their earnings fall below the basic

⁴⁷ This estimate is based on a 2023 report, considering the average number of hours worked for 86% of MDW respondents (10–16 hours per day), and considering the current Minimum Allowable Wage of HKD 5,100 per month. See Huynh *et al.*

tax threshold of HKD 145,000 per year,⁴⁸ or roughly HKD 11,000 per month.⁴⁹

I think they're bringing a very negative impact... 5,000 HKD is a lot of money for her home country. The government does not benefit from this helper, because they send all their money back to their home country. Unlike Singapore and the UAE, where they tax the helper's salary. (Interview #12)

Findings suggest that employer treatment is shaped by broader structural influences, including perceived economic pressures and social norms regarding who is entitled to resources and social protections. Viewed through an intersectional lens, we illustrate how economic concerns intersect with migration status, nationality, and labour market inequalities to shape perceptions of deservingness. The findings revealed gendered differences in these attitudes, with women showing more support than men for an increase in MDWs' minimum wage and greater support for their access to social services. Men, however, were twice as likely to feel that MDWs have driven up taxes. Women's more positive perceptions may reflect their closer engagement with the reproductive and care labour performed by MDWs, while men's more exclusionary views point to the role of gendered power relations in shaping perceptions of entitlement and inclusion.

Harmful Stereotypes and Perceptions of Inferiority

The survey included statements to measure stereotypical perspectives used to categorise certain diasporas of migrant workers. While most employers disagreed, 16.3% reported that 'MDWs are mostly uneducated'. IOM research indicates that 25% of MDWs in Hong Kong have tertiary-level education, with the same true for half of Filipino migrants.⁵⁰ Both employers reporting severe exploitation and psychological aggression were three times more likely (27%) than other employers (9%) to view MDWs as uneducated (Figure 3). Racist stereotypes linked to MDWs' ethnic origin may reinforce perceptions of workers as inferior or unworthy, thereby normalising exploitative treatment and enabling employers to play down the harms caused by exploitative or psychologically aggressive behaviour. The persistence of these stereotypes helps explain how exploitative practices may become normalised within domestic work settings.

⁴⁸ Inland Revenue Department, *2026-27 Budget Tax Measures*, 2026, retrieved 28 August 2026, https://www.ird.gov.hk/eng/faq/budget2026_27.htm.

⁴⁹ The Minimum Allowable Wage for MDWs as of August 2026, is HKD 5,100 per month, not including food allowance.

⁵⁰ Huynh *et al.*

A minority of employers endorsed negative stereotypes about MDWs, with 14.1% agreeing that domestic workers often lie and steal. Employers reporting psychological aggression were almost twice as likely to hold this view (20%), while severely exploitative employers were also more likely to agree. Additionally, 11.4% of employers endorsed the stereotype that MDWs carry unknown or rare diseases, reflecting how racial prejudice may pathologise migrant workers and generate anxieties surrounding their presence within the household. Although these views were held by a minority, the findings indicate how prejudices may justify control over MDWs as they represent a physical threat. These findings support arguments that migrant domestic workers occupy a uniquely vulnerable position within global labour hierarchies.

Semi-structured interviews further revealed stereotypes portraying MDWs as dishonest, sexually threatening, unhygienic, and poorly educated:

When I was young, I read a book at the library that taught employers how to guard against domestic workers. It mentioned that they might steal money or seduce male employers. (Interview #3)

The data support other research that MDWs occupy a ‘position of inferiority’ within Hong Kong society and are perceived as dishonest or sexually threatening.⁵¹ Such perceptions may legitimise unequal power relations, normalise coercive forms of control, and reduce social condemnation of exploitative practices, including severe administrative exploitation, violence, and psychological aggression used to regulate workers’ behaviour.

Income and Perceptions

Our research challenges the literature on the relationship between income and perceptions, showing that perceived competition for resources and economic insecurity may contribute to more exclusionary attitudes towards migrant workers. Low-income households are four times more likely than high-income households to believe MDWs often lie and steal, and twice as likely to think they carry unknown diseases. Middle-income households were the least supportive of equal opportunities, and they were accordingly the most likely to deduct salaries, hold onto phones, restrict freedom of movement, or use shouting or threats. In contrast, high-income households were more supportive of MDWs’ access to social services and were 31% more likely to advocate for raising their minimum

⁵¹ Ho and Sewell; N Constable, *Maid to order in Hong Kong: Stories of migrant workers (2nd Edition)*, Cornell University Press, Ithaca, 2017; J Ho and M M Chiu, ‘Exploring the media representation of migrant domestic workers in Hong Kong: A mixed-methods analysis’, *Review of Communication*, vol. 25, issue 3, 2025, pp. 149–163, <https://doi.org/10.1080/15358593.2025.2485065>; Ladegaard, 2016.

wage. Findings show that exploitative practices may be linked not only to prejudice but also to the pressures of balancing care needs and household finances within constrained economic circumstances.

Employers' Attitudes Towards Migrant Domestic Workers in the Household

The study was interested in employers' attitudes towards the MDWs within their own household, as it was hypothesised that these may differ from their broad perceptions about MDWs in general.

Gratitude and Recognition of Household Contribution

Employers recognised the impact of MDWs on their lives, with 88.6% reporting gratitude for their household contribution. A large majority of employers also felt that their MDWs relieved them of household burdens (87%) and enabled them to devote more time to their career (83%). Employers evaluated their relationships with MDWs positively, overwhelmingly reporting that they had a good relationship (80%) and trusted the workers in their household (72%). Quantitative data support that for most, the relationship was conceptualised through a familial rather than purely contractual lens, with employers largely reporting MDWs are a 'part of the family'. These findings highlight the complex intertwining of intimacy and employment characteristic of domestic work and demonstrate how perceptions of closeness may coexist with unequal power relations and, in some cases, exploitative practices. MDWs' contribution to the household was also widely acknowledged as valuable during qualitative interviews.

It makes us appreciate the kind of work our helper does day to day, because otherwise, we wouldn't be able to have jobs and free time. (Interview #6)

Our findings underscore the relational and affective dimensions of domestic and care work. Consistent with scholarship on intimate labour, employers frequently expressed positive attitudes towards MDWs, such as gratitude, trust, and family inclusion, including those who reported behaviours classified as exploitative or psychologically aggressive (Figure 4).

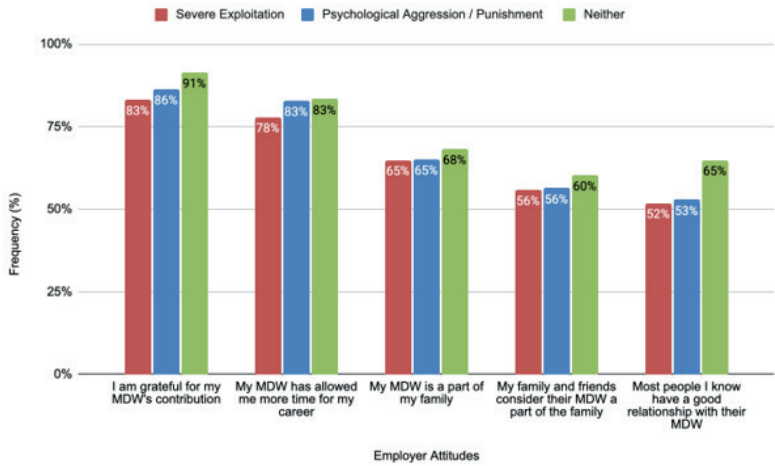


Figure 4. Employer positive attitudes disaggregated by reported exploitation (%)

This demonstrates that positive affective relationships do not necessarily translate into equitable labour practices, reflecting a central tension within intimate labour. Domestic work, therefore, can be characterised as a form of intimate labour comprising the coexistence of emotional intimacy and structural inequality, whereby workers may be regarded as trusted or even family-like figures while remaining subject to employer control and unequal employment conditions. Employers who did not report exploitative practices were more likely to perceive positive treatment of MDWs as a broader social norm. This suggests that ethical treatment may be influenced by perceptions of collective norms around what constitutes appropriate behaviour in employment relationships. However, when viewed through an intersectional lens, these positive perceptions do not eliminate the unequal power relations embedded within domestic work, as MDWs continue to occupy a structurally subordinate position shaped by their intersecting identities.

Controlling Attitudes and Disharmony

A significant proportion of employers, particularly those reporting exploitation, demonstrated controlling attitudes. Over one third (36.9%) felt that their domestic worker should focus solely on work, not on their personal life. This sentiment was more pronounced among employers who reported severe exploitation (51%) and psychological aggression and punishment (45%) (see Figure 5).

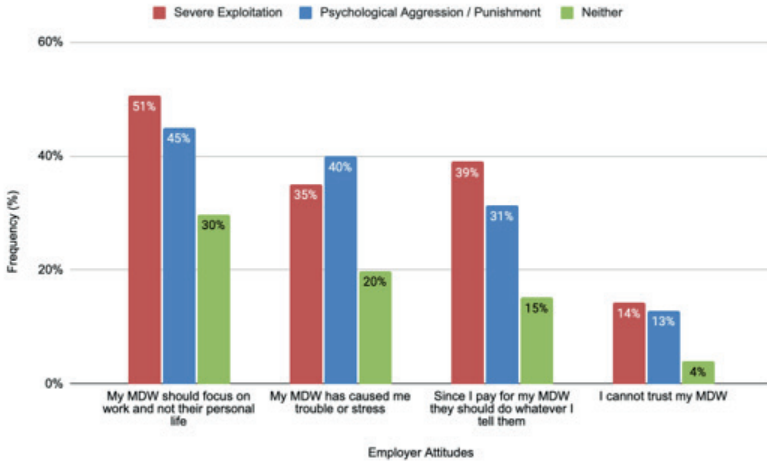


Figure 5: Employer negative attitudes disaggregated by reported exploitation

These employers were also more than twice as likely to expect obedience from their MDWs, with roughly a third reporting, ‘since I pay for my domestic worker, they should do whatever I tell them to do’. It is likely that prejudice towards MDWs, more prevalent among exploitative employers, including concerns around mistrust, disease and a lack of education, results in controlling attitudes and behaviours and justifies coercive behaviour, restrictions on freedom of movement, document withholding, and even violence. These findings directly substantiate Siu’s ‘subjugation model’, which demonstrates how employers assert dominance over MDWs.⁵² More broadly, they reflect the structural organisation of domestic work as a form of intimate and embodied labour. Because domestic work is performed within the private household and involves workers’ physical presence, emotional labour, and everyday interactions with family members, employers may come to view not only labour but also workers’ time and personal autonomy as subject to managerial control. As scholars of embodied and intimate labour argue, the live-in arrangement blurs the boundaries between employment and private life, encouraging expectations of constant availability, obedience, and deference rather than recognising domestic workers as rights-bearing employees

⁵² K Siu, *Chinese Migrant Workers and Employer Domination: Comparisons with Hong Kong and Vietnam*, Palgrave Macmillan, Singapore, 2020.

with personal lives.⁵³ Some employers' expectations of total compliance reflect individual prejudice as well as the broader labour regime governing migrant domestic work, in which legal dependency, isolation, and unequal social relations facilitate the normalisation of control and subordination.

Around one third (29.4%) of employers reported dissatisfaction with their MDWs, stating that they had caused them trouble or stress (Figure 5). This was substantially more common among employers reporting psychological aggression or non-violent punishment and somewhat more common among those reporting severe exploitation, suggesting that workplace tensions may contribute to the use of coercive or controlling management practices. Employers reporting exploitation or psychological aggression were also more likely to report low levels of trust in their MDWs, indicating a relationship between suspicion, conflict, and mistreatment.

Economic Constraints and Attitudes

Financial concerns again emerged as an important factor influencing employer attitudes. Survey data and qualitative interviews indicate that some viewed hiring MDWs as an economic burden that strained family resources. In contrast, others worried about 'wasting money' on workers who did not meet expectations. Low- and low-middle-income households may have expected more from their MDWs and been disappointed, as they were three times more likely to expect their MDWs to 'do whatever I tell them' and 15% more likely to report that their MDWs had caused them trouble or stress. There were also concerns about MDWs taking advantage of generous employers, revealing underlying anxieties about financial resources. These concerns focus specifically on the financial investment of hiring MDWs and potential losses if workers do not meet expectations. The findings correspond with IOM's 2020 data, which cite employers' economic concerns, including reluctance to pay higher wages beyond the minimum allowable wage; worries about additional costs beyond salaries; reluctance to provide better working conditions if it involved additional financial outlay; and concerns about

⁵³ See, on embodied inequality in domestic work: E M De Cassanova, 'Embodied Inequality: The Experience of Domestic Work in Urban Ecuador', *Gender & Society*, vol. 27, issue 4, 2013, pp. 561–585, <https://doi.org/10.1177/0891243213483895>; on the construction of 'productive and deferential bodies' among Indonesian domestic workers in Malaysia: P Y Hierofani, 'Productive and deferential bodies: The experiences of Indonesian domestic workers in Malaysia', *Gender, Place & Culture*, vol. 28, issue 12, 2021, pp. 1738–1754, <https://doi.org/10.1080/0966369X.2020.1855121>; and on the blurring of work and private life in employers' homes and its implications for the regulation and control of migrant domestic workers: B S A Yeoh and S Huang, 'Transnational Domestic Workers and the Negotiation of Mobility and Work Practices in Singapore's Home-Spaces', *Mobilities*, vol. 5, issue 2, 2010, pp. 219–236, <https://doi.org/10.1080/17450101003665036>.

replacing workers who did not meet expectations.⁵⁴ The findings suggest that financial concerns and economic strain shape expectations and control dynamics within households.

Gender and Attitudes

While both genders showed appreciation for their MDWs, women demonstrated stronger sentiments: they were 24.7% more likely to strongly agree that they were grateful for their workers and more likely to consider them a part of their family. Women were 19% more likely than men to feel that MDWs helped them with their household burden and felt more strongly that they had a positive relationship with their workers. Lower reported rates of severe exploitation, including controlling behaviour among women employers, demonstrate that women's increased positive regard for MDWs corresponds with more ethical treatment in the household. This finding highlights gendered differences in employment relationships and attitudes, suggesting perhaps that, as women employers have historically borne a larger share of domestic labour, they may view domestic work through a relational lens, emphasising emotional and intimate labour, while male employers enact more hierarchical relations, emphasising dominance and top-down control. Rather than reflecting isolated employer behaviours, these findings illustrate how broader social norms, migration regimes, and unequal power relations are translated into everyday household practices.

Conclusion

This article examined how employers' attitudes, perceptions, and broader structural factors relate to the treatment of migrant domestic workers within Hong Kong households. The study demonstrates that prejudices, stereotypes, and exclusionary attitudes towards MDWs are a driver of exploitative behaviour within households. Severe exploitation and psychological aggression were associated with stronger exclusionary and controlling attitudes towards MDWs, and with harmful stereotypes portraying workers as uneducated, dishonest, or inferior. We argue that perceptions of deservingness, entitlement, and worker rights are shaped by intersecting inequalities of gender, class, nationality, and migration status. Employers reporting exploitation were more likely to oppose equal access to services and opportunities for workers and to express concerns about resource scarcity. Racialised stereotypes regarding obedience, trustworthiness, and vulnerability appeared to legitimise unequal treatment.

⁵⁴ J Guse, *Survey Report: Understanding and Attitudes of Employers of Migrant Domestic Workers towards Ethical Recruitment and Decent Work Principles in Hong Kong Special Administrative Region, China*, International Organization for Migration, Hong Kong, 2020.

Viewed through an intersectional lens, these findings show how social hierarchies can be reproduced within domestic employment relationships. As well as being influenced by attitudes, employer treatment is also shaped by broader structural influences, including gendered power relations, care responsibilities, economic pressures, and social norms. The overrepresentation of male employers, middle-income households, households with elderly dependents, and smaller living spaces among those reporting exploitative practices suggests that exploitation is embedded within the everyday struggles of care provision, financial anxieties, and household management, rather than arising solely from individual prejudice or malicious intent.

We demonstrate Hong Kong's structural dependence on migrant domestic labour and the gendered redistribution of care work. Most employers acknowledged that MDWs relieved household burdens, enabled dual-income livelihoods, and reduced the unpaid care burden that would otherwise fall disproportionately on women. The greater appreciation expressed by female employers, alongside their lower reported rates of exploitative treatment, suggests that closer engagement with caregiving responsibilities may influence attitudes towards MDWs and their treatment within the household. This supports prior research that employment relations are shaped by gendered understandings of authority, as male employers enact more hierarchical employment relations, associated with controlling behaviour, while women may be more likely to view domestic work as relational, emphasising emotional closeness and intimacy. Yet our findings highlight a central tension within domestic work as a form of intimate labour by revealing the coexistence of emotional closeness and structural inequality. Many employers described MDWs as trusted, appreciated, and even part of the family, yet these positive sentiments coexisted with expectations of obedience, restrictions on autonomy, and even exploitative practices. This challenges assumptions that positive interpersonal relationships mitigate exploitation and instead demonstrates how care, dependency, affection, and control can become intertwined to obscure unequal power relations and normalise forms of control that extend into workers' everyday lives.

In summary, we argue that exploitative labour relations are shaped not only by individual employer attitudes and behaviour but also by broader social and economic inequalities, gendered norms, migration governance frameworks, and racialised cultural narratives. Addressing these issues, therefore, requires strengthened labour protections and improved migration governance as well as longer-term efforts to challenge harmful stereotypes, shift societal norms, and foster a culture of dignity and respect for domestic workers. Understanding employer attitudes is critical to improving employment conditions and advancing more equitable approaches to domestic work. This article also reveals avenues for future research. Qualitative approaches could provide deeper insight into how employers justify, normalise, or contest exploitative practices in their everyday interactions with MDWs. Further research could explore how positive

perceptions and appreciation towards MDWs coexist with exclusionary attitudes and coercive practices. Comparative research across destination countries would also be valuable in identifying how differing legal, cultural, and socioeconomic contexts shape employer attitudes and employment practices. Finally, similar investigations could be extended to other sectors associated with elevated risks of labour exploitation, including fishing and agriculture, to examine whether comparable dynamics of dependence, control, and gendered and racialised labour hierarchies emerge.

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Migrant Filipina Domestic Workers Navigating Precarity and Possibility in Pakistan

Runa Lazzarino, Eleonore Kofman, and Sobia Kapadia

Abstract

Rooted in feminist political economy, critical migration theory, and scholarship on intimate labour, this article explores how gendered, racialised, and class hierarchies, recruitment agencies, bilateral labour arrangements, and shifting regulatory frameworks shape migrant Filipina domestic workers' experiences in Pakistan. Drawing on seven interviews in Islamabad and Lahore, the article asks how intersecting harms linked to labour informality, migration status, employer power, and household intimacy are negotiated through individual and collective agentic practices. It argues that migrant Filipina domestic workers' experiences cannot be understood through victimhood or empowerment alone. Rather, their lives are shaped by the interplay between structural precarity and situated agency, expressed through migration decisions, employer changes, community networks, religious and familial negotiations, entrepreneurship, and strategies of relative upward mobility. The article concludes with policy and practice implications for labour law recognition, recruitment regulation, improved data collection, migrant women's associations, and intersectional gender and migration policy.

Keywords: migrant domestic work, Filipina migrant workers, Pakistan, labour regulation, South–South migration, bilateral labour agreements, women's agency

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Introduction

The growing entry of women into labour markets, and the resulting reconfiguration of care regimes, has fuelled demand for migrant domestic workers (MDWs), often recruited from neighbouring or regional countries.¹ This pattern has intensified since the early 2000s, particularly in the households of the expanding middle and upper classes,² and migrant women now constitute a significant share of the global domestic workforce.³

Domestic work encompasses all paid work, ‘within an employment relationship’, which is ‘performed *in* and *for* the household’, as per the definition in the International Labour Organization (ILO) *Domestic Workers Convention* of 2011.⁴ Tasks range from cooking and cleaning to caring for children and adults. Domestic work is characterised by the space where it occurs, i.e. the household; it also has the peculiar feature of not being oriented to the production of goods but the reproduction of the family and the workforce, which underpins an unequal gender-based division of labour of capitalist societies.⁵ The globalisation of social reproduction is, in fact, based on an unequal international division of reproductive labour which informs domestic work performed by migrant women.⁶

In this article, we explore Filipina migrant domestic workers in Pakistan as a distinct case for unpacking migrant domestic work within the framework of South–South migration flows and of a configuration different from *kafala*-like systems. In fact, scholarship on MDWs has largely focused on South–North

¹ L Izaguirre and M Walsham, ‘South–South Migration from a Gender and Intersectional Perspective: An Overview’, Working Paper, *MIDEQ: Migration for Development & Equality*, 2021.

² H Lutz, ‘Care as a Fictitious Commodity: Reflections on the Intersections of Migration, Gender and Care Regimes’, *Migration Studies*, vol. 5, issue 3, 2017, pp. 356–368, <https://doi.org/10.1093/migration/mnx046>.

³ K Pandey, R S Parreñas, and G S Sabio, ‘Essential and Expendable: Migrant Domestic Workers and the COVID-19 Pandemic’, *American Behavioral Scientist*, vol. 65, issue 10, 2021, pp. 1287–1301, <https://doi.org/10.1177/00027642211000396>.

⁴ ILO, *C189 – Domestic Workers Convention*, 2011.

⁵ S Marchetti, ‘Introduction’, in S Marchetti (ed.), *Migration and Domestic Work: IMISCOE Short Reader, IMISCOE Research Series*, Springer International Publishing, Cham, 2022, pp. 1–11.

⁶ E Kofman, ‘Gendered Labour Migrations in Europe and Emblematic Migratory Figures’, *Journal of Ethnic and Migration Studies*, vol. 39, issue 4, 2013, pp. 579–600, <https://doi.org/10.1080/1369183X.2013.745234>; R S Parreñas, ‘Migrant Filipina Domestic Workers and the International Division of Reproductive Labor’, *Gender and Society*, vol. 14, issue 4, 2000, pp. 560–580, <https://doi.org/10.1177/089124300014004005>.

flows,⁷ specific migration corridors, and certain national groups. Much attention has also focused on *kafala*⁸ and other sponsorship systems where MDWs are similarly tied to their employers, such as the UK's Overseas Domestic Worker visa.⁹ Migrant Filipina domestic workers (MFDWs) in Pakistan are also positioned in a specific way with respect to local domestic workers. They are preferred to Pakistani workers, but they share with them—as well as with the majority of MDWs worldwide—structural conditions of vulnerability, such as the informality of domestic labour, the home as workplace, and the privileged position of their employers. Yet, MDWs' experiences are also shaped by an array of other elements, including their positioning vis-à-vis local domestic workers, such as the practices of recruitment agencies; racial, religious, class, and gender discrimination; inconsistent labour regulations; and forms of collective organising and networking. Precarious conditions as workers and possibilities for resistance thus differ across countries and regions.

Based on research with seven MFDWs in Islamabad and Lahore,¹⁰ this article investigates how MFDWs respond to weak labour protection and employer power while forging support mechanisms. It asks how intersecting harms linked to labour informality, migration status, recruitment, employer power, gendered household relations, and racialised/classed hierarchies are negotiated by workers through individual and collective strategies of mobility, care, community-building, and resistance. In doing so, it examines how gendered labour migration is lived through the intertwined registers of work, care, social reproduction, mobility, and situated agency.

⁷ E Kofman and P Raghuram, 'The Implications of Migration for Gender and Care Regimes in the South', in K Hujo and N Piper (eds.), *South–South Migration*, Palgrave Macmillan UK, London, 2010, pp. 46–83.

⁸ A Pande, "'The Paper That You Have in Your Hand Is My Freedom': Migrant Domestic Work and the Sponsorship (Kafala) System in Lebanon', *International Migration Review*, vol. 47, issue 2, 2013, pp. 414–441, <https://doi.org/10.1111/imre.12025>.

⁹ D Demetriou, "'Tied Visas" and Inadequate Labour Protections: A Formula for Abuse and Exploitation of Migrant Domestic Workers in the United Kingdom', *Anti-Trafficking Review*, issue 5, 2015, <https://doi.org/10.14197/atr.20121555>; S J Tan, 'When the Home Is Also the Workplace: Women Migrant Domestic Workers' Experiences with the "Live-in" Policy in Singapore and Hong Kong', *Anti-Trafficking Review*, issue 20, 2023, pp. 75–91, <https://doi.org/10.14197/atr.201223205>.

¹⁰ This article draws on a larger multi-country study of gendered labour migration across the Global South, which included refugee women as well as highly skilled migrant professionals. E Kofman, R Lazzarino, and C Passaniti Mezzano, *Gendered Dynamics of Labour Migration – Migration and Displacement Stream of the Gender Justice and Security Hub. Analytical Snapshot*, Middlesex University and Gender Justice and Security Hub, London, 2023.

Intimate Labour and the Governance of Migrant Domestic Work

Migrant domestic work illustrates the hierarchical texture of the global political economy of labour migration, revealing pronounced intersecting post-colonial and post-slavery inequalities. These inequalities create a divide between women employers and employees and their socio-cultural, racialised, and class positioning, as well as along age and religion axes.¹¹ Furthermore, women MDWs often work under unprotected labour conditions, making them structurally vulnerable to exploitation.¹²

Compounding these structural and regulatory configurations, domestic work—occurring inside a private household—can be conceived as intimate labour. In this article, we understand intimate labour as work that takes place in close proximity to bodies, households, emotions, and family life, and that often blurs the boundaries between paid work, care, affective availability, and social reproduction.¹³ The home is simultaneously a workplace and a living space, making the boundaries between employment, care, dependency, and control especially difficult to separate.¹⁴ This means that the harms associated with domestic work do not sit neatly within conventional labour categories. They emerge across the public/private divide, where employment, migration status, household dependency, gendered expectations, and employer discretion intersect. An intimate labour lens therefore helps examine not only wages, contracts, and recruitment but also how hierarchy, care, surveillance, belonging, emotional labour, and constrained mobility are organised within the household and mediated by wider migration systems.

¹¹ S Marchetti, D Cherubini, and G Garofalo Geymonat, *Global Domestic Workers: Intersectional Inequalities and Struggles for Rights*, Bristol University Press, Bristol, 2021.

¹² J Dalton *et al.*, *Addressing the Trafficking of Women Migrant Workers in Poorly Regulated Sectors*, Policy Brief, UN Women, 2025.

¹³ E Boris and R S Parreñas (eds.), *Intimate Labors: Cultures, Technologies, and the Politics of Care*, Stanford University Press, Stanford, 2010.

¹⁴ Tan.

Recruitment agencies have become key actors in facilitating labour migration.¹⁵ Some are registered businesses; others are informal and operating at the level of transnational communities and families; while others are illegal, lucrative businesses trafficking migrants into exploitation and forced labour.¹⁶ Agencies manage the logistics of the migration process, from visas and permits to contracts and travel arrangements. They also contribute to the stratification of the migrant labour market based on racial and gendered criteria.¹⁷ In migrant domestic work, recruitment agencies do more than arrange migration logistics. They help produce the conditions under which workers enter private households as carers, cleaners, nannies, and companions, often on the basis of racialised and gendered assumptions about trustworthiness, obedience, care, English-language competence, and emotional availability.¹⁸ Their role is therefore not merely administrative but constitutive of the labour relation itself: they match workers to employers, frame workers' value, mediate expectations of care and availability, and may become the first point of recourse when harms occur inside the household. This makes the delegation of worker protection to for-profit intermediaries particularly problematic, because the same actors who profit from placement and circulation are often expected to safeguard workers' rights and wellbeing.

Bilateral labour agreements (BLA) are another element of the global labour migration system. While, on paper, they set out the procedures for hiring migrants between two countries, the critical literature suggest that BLAs should be understood as ambivalent governance instruments: they may create a framework for safer recruitment and standard contracts, but they can also consolidate temporary, gendered, and tightly managed labour mobility.¹⁹ Additionally, BLAs are often confidential and weakly enforceable, and they serve shared interests of sending and receiving states in policing migrant workers' mobility and regulating the migration industry as much as—or more than—securing migrant workers' rights.²⁰

¹⁵ P Deshingkar, M Awumbila, and J Kofi Teye, 'Victims of Trafficking and Modern Slavery or Agents of Change? Migrants, Brokers, and the State in Ghana and Myanmar', *Journal of the British Academy*, vol. 7, issue s1, 2019, pp. 77–106, <https://doi.org/10.5871/jba/007s1.077>.

¹⁶ *Ibid.*

¹⁷ K Jones, 'Brokered Discrimination for a Fee: The Incompatibility of Domestic Work Placement Agencies with Rights-Based Global Governance of Migration', *Global Public Policy and Governance*, vol. 1, issue 3, 2021, pp. 300–320, <https://doi.org/10.1007/s43508-021-00017-8>; Marchetti, Cherubini, and Garofalo Geymonat.

¹⁸ *Ibid.*; Boris and Parreñas.

¹⁹ K Amirthalingam *et al.*, 'Bilateral Labour Agreements as a Tool for Managing Gendered Migration from Sri Lanka', in J Crush, A Chikanda, and S Ramachandran (eds.), *New Directions in South–South Migration*, Springer Nature, Singapore, 2025, pp. 133–153.

²⁰ Y Livnat and H Shamir, 'Gaining Control? Bilateral Labor Agreements and the Shared

At the same time, MDWs' capacity to react, resist, and pursue life-planning strategies have remained understudied,²¹ although recent perspectives have demonstrated their agency and activism.²² Agency has been identified in women's decision to migrate in response to gender discrimination, domestic violence, and limited employment opportunities in their home countries, deploying migration as a potential solution.²³ Post-migration, they may adopt various individual coping strategies, such as changing employers or even countries, to improve their working conditions and seek higher salaries.²⁴ It is important to recentre the perspective closer to migrants' experiences and their own sense of agency in order to move away from stereotypical victimising view²⁵ and appreciate the interplay, rather than just the opposition, between agency and lack of agency.²⁶

Gender, Labour, and Migration in Pakistan: Filipinas and local domestic workers

Pakistan is primarily viewed as a receiving country of international refugees—mainly Afghans—and low-skilled migrants from South and Central Asia, the Middle East, China, and the Philippines.²⁷ Women's labour and labour migration have been actively discouraged via legal barriers and cultural norms

Interest of Sending and Receiving Countries to Control Migrant Workers and the Illicit Migration Industry', *Theoretical Inquiries in Law*, vol. 23, issue 2, 2022, pp. 65–94, <https://doi.org/10.1515/til-2022-0011>.

- ²¹ P Deshingkar and B Zeitlyn, 'South–South Migration for Domestic Work and Poverty: A Review of the Literature in Asia and Sub-Saharan Africa', *Geography Compass*, vol. 9, issue 4, 2015, pp. 169–179, <https://doi.org/10.1111/gec3.12200>.
- ²² B Fernandez, *Ethiopian Migrant Domestic Workers: Migrant Agency and Social Change*, Springer, Cham, 2019; Izaguirre and Walsham.
- ²³ G Ferrant and M Tuccio, 'South–South Migration and Discrimination Against Women in Social Institutions: A Two-Way Relationship', *World Development*, vol. 72, 2015, pp. 240–254, <https://doi.org/10.1016/j.worlddev.2015.03.002>.
- ²⁴ R S Parreñas, *Unfree: Migrant Domestic Work in Arab States*, Stanford University Press, Stanford, 2021.
- ²⁵ D Mulinari and K Sandell, 'Exploring the Notion of Experience in Feminist Thought', *Acta Sociologica*, vol. 42, issue 4, 1999, pp. 287–297, <https://doi.org/10.1177/000169939904200401>.
- ²⁶ D Isik, 'On Sabir and Agency: The Politics of Pious Practice in Konya's Carpet Weaving Industry', *International Feminist Journal of Politics*, vol. 10, issue 4, 2008, pp. 518–541, <https://doi.org/10.1080/14616740802393908>.
- ²⁷ A Cibeá *et al.*, *Pakistan Migration Country Report*, International Centre for Migration Policy Development, Vienna, 2013; International Organization for Migration (IOM), 'Pakistan Migration Snapshot', 2019, retrieved 28 May 2026, <https://pakistan.iom.int/resources/pakistan-migration-snapshot>.

that discriminate between activities of men and women,²⁸ as well as along social classes and castes that are responsible for the social undesirability of women's employment in formal work outside the home.²⁹ This socio-cultural norm is referred to as *purdah* (Urdu for 'curtain' or 'veil'), and 'denotes the spatial segregation of women's and men's spheres of circulation in the name of family honour'.³⁰ Accordingly, regular immigration of women workers to Pakistan has remained under-researched in both academic³¹ and policy debates.

Nonetheless, over the past two decades, Pakistan has become an employment destination for MFDWs amid rapid urbanisation and economic expansion.³² These dynamics have driven the growth of the middle class and created rising demands for domestic help, with a preference for MFDWs as a distinct status symbol.³³ However, paid domestic work remains a significant and difficult-to-measure segment of employment accounting for 8.5 million workers in the informal economy, predominantly local women, boys, and girls.³⁴ The latest Labour Force Survey³⁵ shows that 81.7% of paid employees are classified as informal. Domestic work remains difficult to quantify because it is largely hidden and unregistered.³⁶ To monitor the sector, the National Database and Registration

²⁸ K A Siegmann, 'Strengthening Whom?: The Role of International Migration for Women and Men in Northwest Pakistan', *Progress in Development Studies*, vol. 10, issue 4, 2010, pp. 345–361, <https://doi.org/10.1177/146499340901000406>.

²⁹ S Ahmed, 'Women Left Behind: Migration, Agency, and the Pakistani Woman', *Gender & Society*, vol. 34, issue 4, 2020, pp. 597–619, <https://doi.org/10.1177/0891243220930698>.

³⁰ J Grünenfelder and K A Siegmann, 'Laboring Practices: Pakistan', in S Joseph, *Encyclopedia of Women & Islamic Cultures Online*, Brill, Leiden, 2016.

³¹ H A Shahid, 'Migrant Filipino Domestic Workers in Pakistan: Agency, Rights and the Limits of the Law', in S Mullally (ed.), *Care, Migration and Human Rights: Law and Practice*, Routledge, Abington, 2015.

³² *Ibid.*

³³ *Ibid.*; A Majid, M Anwar, and Z Tariq, *The Growing Trend of Hiring Philippine Nannies in Pakistan: Causes and Consequences*, Lahore School of Economics, Lahore, 2015.

³⁴ S Asrar, 'Safeguarding Pakistan's Domestic Workers Will Take More Than Just Laws', *South Asian Voices*, 14 March 2023, retrieved 12 May 2026, <https://southasianvoices.org/safeguarding-pakistans-domestic-workers-will-take-more-than-just-laws>.

³⁵ Government of Pakistan Ministry of Planning, Development & Special Initiatives and Pakistan Bureau of Statistics, *Pakistan Labour Force Survey 2024–25*, Pakistan Bureau of Statistics, Islamabad, 2025.

³⁶ M M Ali, S Mukhtar, and A Ghaffar, 'Protecting Rights of Domestic Workers in Pakistan: An Analysis of Existing Laws and Need for Comprehensive Legislation', *Al-Aasar Journal*, vol. 2, no. 1, 2025, pp. 689–703; N Shafeeq, F Naz and R-N Awan, 'Doing the Dirty Work: The Experiences of Female Domestic Workers in Pakistan', *Journal of Development and Social Sciences*, vol. 3, issue 2, 2022, pp. 171–182, [https://doi.org/10.47205/jdss.2022\(3-II\)17](https://doi.org/10.47205/jdss.2022(3-II)17).

Authority (NADRA) has issued registration forms to Islamabad households, collecting information on nationality, type of work, and other details. However, reliable statistics remain scarce. It has been calculated that MFDWs constitute one of the largest groups among the estimated over 2,000 Filipinos living in Pakistan and of the over 1,000 holders of a working visa.³⁷

Migrant domestic workers—particularly Filipinas—typically live with their employers and are hired through recruitment agencies. Compared with Pakistani domestic workers, they tend to earn higher wages, experience better treatment, and have written employment contracts within the framework of bilateral agreements between the two countries. Nonetheless, neither Pakistani nor Filipina domestic workers are protected by national or international legal frameworks regulating their employment conditions and rights as workers. The lack of labour protections, workers' economic and migrant status, and employers' stronger bargaining position force MFDWs to navigate and strategise within conditions of structural precarity.

MFDWs and Shifting Regulations

Pakistan's legal framework for domestic work and migrant work is fragmented. The country has not ratified key ILO conventions protecting migrant and domestic workers.³⁸ There is no comprehensive national law to regulate migrant domestic work; instead, a patchwork of provincial and territorial statutes³⁹ and bilateral and consular arrangements apply. In the early 2010s, when the most comprehensive available study was conducted,⁴⁰ the country had merely concluded a BLA with the Philippine Government to regulate recruitment.⁴¹ The contents and details of this agreement are unknown, as is often the case.⁴² However, details of

³⁷ Embassy of the Islamic Republic of Pakistan in Manila, 'An Overview of Pakistan Philippines Relations', 2022, retrieved 28 May 2026, <https://pakembmanila.org/bilateral-relations>. Shahid reported that there were around 3,000 to 5,000 documented and undocumented MFDWs in Pakistan, with only 700 to 800 registered with the Philippines Embassy. Shahid.

³⁸ These conventions include: ILO, *C097 - Migration for Employment Convention (Revised)*, 1949; *C143 - Migrant Workers (Supplementary Provisions) Convention*, 1975; *C181 - Private Employment Agencies Convention*, 1997; *C183 - Maternity Protection Convention*, 2000; and *C189 - Domestic Workers Convention*, 2011.

³⁹ *Punjab Domestic Workers' Act 2019* and *Islamabad Capital Territory Domestic Workers Act 2022* (see below).

⁴⁰ Shahid.

⁴¹ RM Rodriguez, *Migrants for Export: How the Philippine State Brokers Labor to the World*, University Of Minnesota Press, Minneapolis, 2010.

⁴² Livnat and Shamir.

contractual terms and conditions of MFDWs employment at the time the BLA was in place are known.⁴³

As Shahid reported, most Filipinas were employed as *mayordoma* (head of staff), often supervising local cooks, cleaners, chauffeurs, gardeners, and security guards. Recruitment was largely mediated by agencies.⁴⁴ The recruitment process typically took six months to one year and required workers to complete a 15-day training programme and pre-departure seminar in the Philippines. For a fee of 350,000–400,000 Pakistani rupees,⁴⁵ Pakistani agents covered visa costs, airfare, paperwork, and commissions. Agencies market MFDWs as trained and English-speaking, catering to elite households, and MFDWs' employment contracts often included better benefits than were typical in the local labour market.⁴⁶

The BLA was suspended in 2018, and the Philippine authorities interrupted the deployment of 'household service workers' to Pakistan. This was reiterated by the Department of Migrant Workers (DMW) in 2023, which stated that the suspension would continue until a new BLA was signed.⁴⁷ At the end of that year, the suspension was partially lifted for returning MDWs, with further consultation needed for newly hired workers.⁴⁸

At the time of writing this paper—over five years after data collection—discussions are moving towards a possible memorandum of understanding between the Philippines and Pakistan, which would include Pakistan-specific pre-departure orientation, strengthened pre-employment screening, enhanced employer commitments, and insurance coverage.⁴⁹ Thus, it appears that the Philippines is reinforcing the protection of overseas domestic workers by combining a higher wage floor (minimum USD 500) with contract-based recruitment, monitoring,

⁴³ Shahid.

⁴⁴ *Ibid.*

⁴⁵ In the early 2010s, PKR 350,000–400,000 were approximately equivalent to USD 3,750–4,700, depending on the exact year and exchange rate used.

⁴⁶ As reported by Shahid, these benefits included a monthly food allowance, usually paid directly for grocery purchases; one month of annual paid leave; and airfare for family visits every two years.

⁴⁷ Republic of the Philippines Department of Migrant Workers, *Deployment of Workers to Pakistan*, 9 March 2023, <https://dmw.gov.ph/archives/v1/resources/dsms/DMW/ISN-EXT/2023/DMW-ADVISORY-09-2023.pdf>.

⁴⁸ Republic of the Philippines Department of Migrant Workers, *Clarification on the Deployment of Household Service Workers Bound to Pakistan*, 11 September 2023, <https://dmw.gov.ph/resources/issuances/advisories/legacy-Advisories-2023-22>.

⁴⁹ K A Ojeda, 'Pakistan Deployment Ban Easing Seen', *Daily Tribune*, 19 November 2025, <https://tribune.net.ph/2025/11/18/pakistan-deployment-ban-easing-seen>.

and welfare safeguards.⁵⁰ These developments are aligned with recent ILO programming in Pakistan,⁵¹ but they remain programmatic and enabling rather than establish fully enforceable protections for MFDWs.⁵²

Advancements in Organising and Regulating Domestic Work in Pakistan

Both local and migrant domestic workers did not have any formal organisational representation in unions and associations in Pakistan, and there has been a stark absence of supportive alliances and networks that could fight for their rights.⁵³ Some organising, largely NGO-initiated,⁵⁴ dates back to 2005 and was later institutionalised through the establishment of the Domestic Workers' Union by the Pakistan Workers Federation with support from the ILO.⁵⁵ More recent projects and interventions include the *Punjab Domestic Workers Act* of 2019,⁵⁶ the

⁵⁰ C Borbon, 'Philippines Raises Minimum Pay for Filipino Overseas Domestic Workers to \$500', *Gulf News*, 24 August 2025, <https://gulfnews.com/world/asia/philippines/philippines-raises-minimum-pay-for-filipino-overseas-domestic-workers-to-500-1.500243396>.

⁵¹ ILO Country Office for Pakistan, *Decent Work Country Programme for Pakistan (2023–27)*, ILO, Islamabad, 2023.

⁵² *Ibid.*

⁵³ The right to form trade unions is recognised and guaranteed, not only in the main human rights instruments but also in ILO Conventions No. 87 and No. 98. Given the regulation to constitute unions in the country, only 2.4% of the labour force are unionised and have access to collective bargaining for their wages and working conditions. Shahid.

⁵⁴ Among the most notable examples, HomeNet Pakistan is a network of organisations formed to raise awareness about the working conditions of home-based women workers who comprise 70% of the informal workforce behind the country's economic activities. HomeNet has been working for the recognition and support of home-based workers since 2005. 'HomeNet Pakistan – HNP', PakNGOs, retrieved 12 May 2026, <https://pakngos.com.pk/ngo/home-net-pakistan-hnp>.

⁵⁵ See 'Domestic Workers' Union', n.d., retrieved 12 May 2026, <https://dwupakistan.org>; ILO, 'First Domestic Workers' Trade Union Registered in Pakistan', 16 January 2015, <https://www.ilo.org/resource/news/first-domestic-workers%E2%80%99-trade-union-registered-pakistan>.

⁵⁶ The *Punjab Domestic Workers Act 2019* was the first provincial legislation to define domestic work as work performed 'within or for the household' and to regulate the employment relationship through written employment contracts, registration with the Punjab Employees Social Security Institution, minimum wage protection, weekly rest, sick leave, maternity leave, public holidays, and other basic workers' rights. Ali, Mukhtar, and Ghaffar.

Islamabad Capital Territory Domestic Workers Act of 2022,⁵⁷ and the intervention to develop a sustainable, gender-responsive model for extending social security coverage and benefits to domestic workers in Punjab.⁵⁸

Given the long-standing lack of comprehensive labour laws protecting domestic workers, these sub-national developments mark an important, though still partial, shift from the earlier legal invisibility of domestic work in Pakistan. At the same time, these reforms should not be overstated: they are constrained by weak implementation, low registration rates, lack of awareness among workers and employers, resistance to formalisation, limited inspection capacity inside private households, and uneven territorial coverage across the country.⁵⁹

MFDWs' written contracts, linked to the BLA, were promising for Pakistani workers. Similarly, these developments, which target primarily local domestic workers, could also be positive for migrant workers. However, they would not fully resolve migrant workers' vulnerabilities unless they also address migrant status, recruitment mechanisms, embassy registration, and accessible complaint mechanisms. This improving yet still unresolved regulatory gap is central to the article's question of how MFDWs' space for manoeuvre and life-planning strategies are negotiated within conditions of structural labour and migration precarity.

Methods

Our study adopted a collaborative design between the Pakistan and the UK teams. Research participants were approached and recruited by two Pakistani organisations—Laajverd Interdisciplinary Collective and PAIMAN Alumni Trust⁶⁰—from within their own networks. Recruitment targeted migrant women over 18 years of age working in Pakistan; sampling was purposeful, combining convenience and snowball strategies. All participants received information about the project and provided verbal informed consent before participating.

⁵⁷ The *Islamabad Capital Territory Domestic Workers Act* 2022 extended legal recognition to domestic workers in Islamabad by prohibiting forced, bonded, and child labour as well as discrimination in recruitment and wages, and by establishing dispute resolution mechanisms, among other protective measures. Ali, Mukhtar, and Ghaffar.

⁵⁸ ILO, 'Expanding Social Protection to Domestic Workers in Pakistan', 2021, <https://www.social-protection.org/gimi/Contribution.action?id=858>.

⁵⁹ Ali, Mukhtar, and Ghaffar; AM Paul, 'Unpacking Cross-Country Variations in Domestic Worker Protection Regimes: Adopting a Policy Regime Perspective', *International Labour Review*, vol. 163, issue 3, 2024, pp. 377–96, <https://doi.org/10.1111/ilr.12432>.

⁶⁰ See 'Laajverd', <http://laajverd.org/laaj>; and 'PAIMAN Alumni Trust', <https://paimantrust.org>.

The study employed qualitative semi-structured interviews (30-60 minutes) conducted in Islamabad and Lahore between December 2020 and June 2021. The interviews were conducted by staff of the two organisations and covered drivers and motivations for migration, family and gender dynamics in countries of origin, experiences of work and life in Pakistan, and the use of urban spaces. Questions also addressed agency, coping strategies, and the impact of the COVID-19 pandemic. Five interviews were conducted face-to-face in outdoor spaces, such as public parks or malls, and two remotely using WhatsApp and Zoom. No interview was conducted at the employer's home. Ensuring compliance with Laajverd's ethical guidelines and code of ethics,⁶¹ interviews were audio-recorded, anonymised, and transcribed verbatim with participants' consent.

In total, seven interviews were conducted with MFDWs. Among those who had resided in Pakistan for more than ten years, one interviewee was an ex-MFDW running a recruitment agency, and two had married Pakistani men and moved out of domestic work. The remaining interviewees were live-in workers whose accounts illuminated the specific challenges and opportunities of migrant domestic labour in Pakistan. They were relatively well-educated, often with agency-provided work permits. Four were divorced or separated, three were married, and six had children.

The analysis of the interview transcripts followed a directed hybrid approach of deductive and inductive thematic analysis, meaning that the interview questions were used to code the data, while simultaneously allowing new, unexpected themes to emerge directly from the participants' responses.⁶²

As with all qualitative enquiry, this study's insights are shaped by the selectivity and scope of its methods. The small sample size, dictated by the relative invisibility of MFDWs in Pakistan, compounded by the exceptional circumstances of the first wave of the COVID-19 pandemic, limits broader generalisations. The diversity of circumstances—duration of stay, legal status, and relational contexts—cannot be fully captured in a single study. In addition, as much of MFDWs' work is still hidden from regulatory oversight and formal enumeration, there remain inherent gaps in quantitative data and in tracking long-term trajectories.

⁶¹ R Lazzarino, E Kofman, and S Kapadia, *Migrant Women Working in Pakistan: Gendered Dynamics of International Labour Migration*, Middlesex University and Gender Justice and Security Hub, London, 2024.

⁶² J Fereday and E Muir-Cochrane, 'Demonstrating Rigor Using Thematic Analysis: A Hybrid Approach of Inductive and Deductive Coding and Theme Development', *International Journal of Qualitative Methods*, vol. 5, issue 1, 2006, pp. 80–92, <https://doi.org/10.1177/160940690600500107>.

This study, therefore, is best read as an invitation to further research and sustained engagement with the lived complexities and shifting landscapes of South–South women’s care work in migration and structural precarity.

The Experiences of Filipina Migrant Domestic Workers in Pakistan

In this section, we frame the voices of migrant Filipina domestic workers against the background of a multi-faceted and shifting migration corridor between the Philippines and Pakistan, shaped by interconnected socio-economic, political, cultural, and personal factors. The analysis foregrounds how participants experienced overlapping forms of labour, migration, and household-based harm within intimate labour relations, while also organising everyday strategies of support, refusal, mobility, and self-making. Accordingly, we look at: MFDWs’ positioning between national and regional stratifications; migration as life planning and situated empowerment; the protective role of recruitment agencies and its limitations; the impact of the COVID-19 pandemic; and other forms of collective and individual strategising.

MFDWs’ Positioning Between National and Regional Stratifications

The tasks of the MFDWs in this study varied—for some they were restricted to cleaning, for others to babysitting, including caring for a child with disabilities. These tasks locate MFDWs within intimate labour because their work involves proximity to employers’ domestic routines, children, bodies, emotions, and family relations; it requires trust, bodily presence, affective attentiveness, and access to private family spaces.⁶³ This helps explain why MFDWs’ positioning in Pakistan was ambivalent. Their foreignness, English-language skills, and association with professionalism could elevate them above local workers in elite households, yet the intimate location of their labour also exposed them to occupational devaluation, dependence on employer discretion, and expectations of availability within the household. The lens of intimate labour therefore sharpens the analysis of stratification: MFDWs were valued not only as migrant workers but as workers entrusted with the intimate reproduction of elite family life.

⁶³ Boris and Parreñas; Tan.

In Pakistan, as elsewhere,⁶⁴ the demand for MFDWs has been driven by the growth of an affluent urban middle class for whom hiring Filipina domestic workers carries the symbolic value of elite status. In our study, we found that these socio-economic changes within the country appeared to be aligned with geopolitical factors of the region, as well as with racialised stratifications. Several participants described being warmly welcomed and positively seen by Pakistani society, sometimes because they were misidentified as Chinese. As one 43-year-old MFDW explained:

Pakistani employers, and people in general, are very welcoming and look at us with respect—sometimes assuming that we are Chinese, and for this more respected.

Pakistan's multi-tiered and strategic alliance with China, and the subsequent implications for MFDWs' social positioning within Pakistani households and society, reflect a unique combination of local class dynamics and broader regional relations in which Pakistan is enmeshed.

Interviewees neither described this misrecognition as a source of discomfort or distress, nor did they experience it as disrespect. In accordance with this sense of being respected as foreigners, none of the study participants reported harassment or discrimination based on their ethnic and cultural background. However, they sometimes felt devalued due to their occupation as domestic workers, as a 31-year-old participant expressed:

Yes, sometimes I do feel discriminated against. But that was in the past when I was working as a caregiver. It was probably because I was just a servant and obviously not of their social standing.

The apparent contradiction of feeling both respected and devalued speaks to the usefulness of adopting an intersectionality lens to untangle the intricacies of the experiences of discrimination and privilege along the different social positioning that each MFDW occupies.⁶⁵ Along racialised and social class lines, they are positioned above Pakistani workers, who are legally unprotected and socially devalued. Local workers suffer from what has been described as a 'triple

⁶⁴ N Constable, *Maid to Order in Hong Kong: Stories of Migrant Workers (2nd Edition)*, Cornell University Press, Ithaca, 2017; R S Parreñas, *Servants of Globalization: Women, Migration and Domestic Work*, Stanford University Press, Stanford, 2001; Majid, Anwar, and Tariq; Shahid.

⁶⁵ M J Gill, A Aqeel, and B Dogra, *Stories of Resilience and Resolve: An Intersectional Study on the Plight of Non-Muslim Women and Girls in Pakistan*, Centre for Law and Justice & Minority Women's Forum, 2022.

discrimination’ at the intersection of religion, caste, and gender.⁶⁶ MFDWs are not part of a caste-based hierarchy, though they may share a devaluation based on religion (as they are often Christian, unless they are misrecognised as Chinese and assumed as non-Christian) and on their job role,⁶⁷ as indicated above.

Migration as Life Planning and Situated Empowerment

The participants in this study confirmed that financial needs and limited employment opportunities in the Philippines were a central driver for their migration. Many were mothers who wanted to provide for their children, either because they were unemployed housewives or because they sought better-paying jobs than those available at home. Yet, financial necessity was frequently intertwined with personal motivations. Several women recounted leaving the Philippines to escape unhappy or abusive marriages, or seeking in migration economic independence, the chance to provide for their children, and to rebuild their lives. A 40-year-old participant shared:

In the Philippines, I'm just a plain housewife. I have four kids, and I am a single mum. I decided to come to Pakistan because I don't have a job in the Philippines. I am jobless there, so I need an income to raise my kids. My mother takes care of my kids and I provide money. They don't have a choice. Otherwise, I don't have a choice also. Because if I will not come here for work, I don't have any job in the Philippines. So how can I raise them? How can I send them to school? How can I buy the food, how can I buy them a roof also?

While expressing a sense of ‘no choice’ in having to migrate, the same participant also expressed pride and a sense of being rewarded for her hard work and of emancipation from needing a husband:

But what will I do with the husband without any help from him? He didn't even support my dream to support my kids. I raised my kids on my own. So, it's useless. No need [for] a husband. If you must raise your kids alone, you can do it.

⁶⁶ Anon, ‘Cut Us Open and See That We Bleed like Them’: *Discrimination and Stigmatization of Sanitation Workers in Pakistan*, Amnesty International, London, 2025.

⁶⁷ B Anderson, *Doing the Dirty Work?: The Global Politics of Domestic Labour*, Palgrave Macmillan, London, 2000.

Remittances play an important part in Filipina migration strategies. As discussed above, on average, Filipinas' salary is USD 450–500 per month.⁶⁸ Higher salaries enabling remittances, payments in foreign currency, and contractual benefits may contribute to job satisfaction, as expressed by most participants. While participants did not mention any past or upcoming BLA between the two countries, what they described in positive terms were conditions resonating with those found when the BLA was in place, prior to 2018.⁶⁹ Nonetheless, MFDWs' advantages should not be overstated. Neither Pakistani nor Filipina domestic workers are covered by labour legislation, and MFDWs' precarity can also only be partially mitigated by the role of the recruitment agencies.

The Protective Role of Recruitment Agencies and Its Limitations

Recruitment agencies play an important role in facilitating Filipinas' migration to Pakistan. Participants spoke of their agents as supportive of their visa, residence and work permits, and other contractual terms; however, it remained unclear if their contract covered health insurance and social assistance.

Acting as intermediaries between workers and employing families, these agencies mobilise state interests in labour supply while deploying marketing strategies. They advertise Pakistan as a safe and profitable alternative to more established destinations such as Hong Kong or Persian Gulf states. As already noted, in the context of intimate labour, agencies do not simply move workers across borders; they mediate workers' entry into private households where employment is difficult to monitor and where harms may be hidden behind the language of family, trust, and care. Agencies may provide contracts, documentation, employer matching, and limited avenues for complaint, as participants' accounts suggest. As one 44-year-old participant explained:

In Pakistan, it's very nice because you only spend to travel to Manila for your papers. The agency will find you an employer, who sponsors you and is responsible for our visa and for us if anything happens.

⁶⁸ Information based on first-hand knowledge of co-author Kapadia and also confirmed in the media and on social media; see e.g. Borbon or S Naqvi, 'Can I Sue an Agency for Breach of Contract and Mental Anguish?', *Vakeel Online Facebook Group*, 27 December 2021, retrieved 12 May 2026, <https://www.facebook.com/groups/vakeelonline/posts/622455115666794>.

⁶⁹ Shahid.

Some participants reported being able to complain to their recruitment agencies about employers or their agent and even change jobs if dissatisfied, suggesting a margin of negotiation.⁷⁰ Specifically, contract rotation gives workers the possibility to re-evaluate their economic and familial situation and re-plan each time if they wish to go back home or embark on another employment, in another city, or even in another country.⁷¹ However, unique to the MFDWs in Pakistan is the ability to change employers before the termination of the contract. A 49-year-old participant changed an employer via a battle with the recruitment agency, showing a considerable level of perseverance.

I was a direct hire through an agent. I paid 20,000 pesos for my paperwork and ticket. To arrange this amount, I had to sell my cow. [...] When I decided to leave, the employer complained that he paid for visa and paperwork and tickets, and I needed to pay all the money back before leaving. I told the employer that I myself paid for everything. When the matter was taken up with the agent, it was found that the agent charged both of us, which is nothing short of swindling. Finding no help, I wrote to the overseas employment agency in the Philippines and complained against my agent.

Yet, this space of manoeuvre is limited. Agencies' business models depend on maintaining relationships with employers and sustaining labour circulation, and they cannot be assumed to act as independent rights-protecting actors. This is especially significant for intimate labour, where exploitation may involve not only unpaid wages or contract breaches but also overwork, isolation, emotional pressure, restricted mobility, dependence on employer goodwill, and vulnerability inside the private household.⁷²

Agencies therefore navigate a contradictory role: they are asked to resolve harms that arise from the very household arrangements they helped broker, while lacking both the legal authority and structural independence to guarantee workers' rights and wellbeing. Indeed, MFDWs remain vulnerable to deportation due to having their visa cancelled and are dependent on the response of the employer, which is a highly problematic aspect of migrant domestic work. In this respect, a 40-year-old MFDW recounted:

⁷⁰ Lazzarino, Kofman, and Kapadia.

⁷¹ R Silvey and R S Parreñas, 'Precarity Chains: Cycles of Domestic Worker Migration from Southeast Asia to the Middle East', *Journal of Ethnic and Migration Studies*, vol. 46, issue 16, 2020, pp. 3457–3471, <https://doi.org/10.1080/1369183X.2019.1592398>.

⁷² Jones; Tan.

The agency helped me before the first time without any expenses. [...] But after three failed placements, I refused to go through an agency for the fourth time. The agency blacklisted me, and the Ministry cancelled my visa. [...] So, what I did is I found an employer. They helped me get a visa.

Evidently, recruitment agencies cannot intervene legally on the workers' behalf: given the absence of legal protection, all disputes remain an agency-employer-employee matter, as the participant above explains. For this, she also recounted how she took the risk of falling outside the agency system altogether, relying instead on personal connections.

While showing the limited room for manoeuvre they can have in Pakistan, the case of these MFDWs corroborates also the structural precarity of agency-mediated migration—both within and outside of BLAs and the existence of written contracts—and the strategies women employ to regain control when official channels fail and threaten them. In intimate labour, such failures are particularly consequential because the worker's vulnerability is not confined to the contract but embedded in the everyday household setting in which she lives, works, cares, and negotiates access to mobility, privacy, and rest. MFDWs' vulnerability was further exposed during the pandemic.

The Impact of the COVID-19 Pandemic

The COVID-19 pandemic exposed and deepened the vulnerabilities of MDWs, revealing the systemic undervaluation of care labour and the fragility of their legal protections as well as exacerbating precarity while highlighting households' reliance on their labour.⁷³ Similar to findings from other studies,⁷⁴ some participants experienced intensified workloads, while others faced reductions in income. Post-pandemic recovery demands a rethinking of how care work is valued, emphasising the urgent needs for rights-based policies and gender-responsive economic frameworks.⁷⁵ This makes the pandemic a critical lens for this special issue's concern with how gendered labour, care, and mobility are reorganised during moments of crisis.

All our participants reported facing fear of job loss, compounded by isolation from families abroad. Such worries negatively affected their mental health and impacted their capacity to exercise resistance. For one participant, ending her contract with an employer that she found exploitative became more difficult

⁷³ Pandey, Parreñas, and Sabio.

⁷⁴ L Foley and N Piper, *COVID-19 and Women Migrant Workers: Impacts and Implications*, International Organization for Migration (IOM), Geneva, 2020.

⁷⁵ Pandey, Parreñas, and Sabio.

due to the pandemic:

My first employers were not nice. Because they are not giving my salary on time, ma'am. In my last two months, they didn't give me my salary. That's why I complained to the agency. And overworked also, until 3 a.m. and until dawn, we were working. It was not easy to end the contract, because of the pandemic. They give them one month notice so that they can get me the money from my previous employer. [...] Now, it's very normal because my employer allowed me to go out. But I will just be careful: wear a mask and use sanitiser and go home at night. Yes, I was scared to lose my job, that's why I'm doing my job very good.

During the pandemic, there were variations from employer to employer in relation to the possibility of leaving the house. The founder of a community-based organisation expressed concern for a situation whereby many Filipino migrant workers faced significant job insecurity, restricted mobility—within the city and to visit their home country—and reduced rest.

The COVID-19 [pandemic] affected us too much because in Pakistan, Filipina are not only in the house, but many Filipinas are also working in a spa, as a therapist, another Filipina is working as teachers, another Filipina is working in some offices, they all [faced] problem in the work. Because no work, no pay. [...] But this Filipina that work in the house of the employer, they don't have a problem, but they didn't have a day off for nine months! They cannot go out because, you know, it depends on the employer.

This example shows how, during crisis, intimate labour can become intensified precisely because the household is both the workplace and the site where care, control, isolation, and employer discretion converge.⁷⁶ The words of this participant turn palpable the implications of the absence of protective labour regulations for MDWs, and migrant workers more broadly, as well as of unions or similar organisations able to advocate for their rights as workers and migrants.

Forms of Collective and Individual Strategising

Though unionisation rates remain very low nationally, MFDWs have built forms of solidarity through both formal and informal networks, as they have done in other destination countries.⁷⁷ All the women in this study stated that they greatly enjoyed their urban life in Islamabad and Lahore, as well as their neighbourhoods.

⁷⁶ Tan; Pandey, Parreñas, and Sabio.

⁷⁷ A Gordo, *Women's Labour Migration from the Philippines*, GAATW, Bangkok, 2020.

This may be linked to the fact that they were working for elite families and residing in more liberal urban spaces where women's mobility is relatively easier than in other parts of the country. They spoke about going out to malls, restaurants, social events to celebrate holidays, and to church—with both their Filipino and Pakistani friends. Their stories are a testimony to the increasingly recognised importance of such practices for reshaping urban life and migrant women's visibility in public spaces.⁷⁸

Emblematic of both individual and collective agency is the aforementioned case of the 35-year-old participant, who left domestic work and became a community leader. In 2017, she founded a Filipino association in Islamabad to help her community in fields ranging from medical to financial aid as well as organising celebrations to keep a sense of community.

We need to be active in the community because we need to tell this Filipinas, all the Filipinas here, we need to guide them, open their mind. [...] I go to the embassy, I talked to the Philippine Ambassador, then I spoke to and I discussed with him that I want to have an active community here, which can guide and care for these people. [...] I talked to some doctors who can give us free services for a one-day checkup. After that we make a sports day, we go to Halloween party, Christmas party, Valentine's—almost every month we had a meeting.

Another form of agency involved leaving domestic work and moving into other roles, family arrangements, or community leadership. For two participants, this shift was closely linked to marriage with Pakistani men and conversion to Islam. The younger one left domestic work to become a coach in her children's school, while the 35-year-old stopped paid domestic work after marriage but developed small entrepreneurial activities and founded the Filipino association.

I'm married here to a Pakistani man. I married in November 2016. So, my husband is not allowing me to work this time. So, I'm fully in the house and doing some entrepreneurial work. Like I'm selling some crochet items handmade like that. And I'm getting some Filipino food for Filipino people. I am the founder and president of this Filipino association.

Her account shows that MFDWs' agency did not always take the form of open resistance or full independence. It was often exercised through adaptation to local norms, selective refusal, community-building, and the creation of alternative spaces for self-realisation within the constraints of marriage, religion, migrant

⁷⁸ D Caillol, 'The Spatial Dimension of Agency: The Everyday Urban Practices of Filipina Domestic Workers in Amman, Jordan', *Gender, Place & Culture*, vol. 25, issue 5, 2018, pp. 645–665, <https://doi.org/10.1080/0966369X.2018.1472555>.

status, and household expectations. Their foreignness, paired with the conversion to Islam, seemed to release them from domestic work—which, as noted, is normally carried out by lower-caste women.

However, marriage introduced new gendered expectations, including pressure to leave paid work altogether or conform to Pakistani family and gender norms. Yet, participants did not simply assimilate. Some resisted patrilocality and the expectation that they should move into their husband's family home and care for in-laws. Many verbally contrasted Pakistani family obligations with Filipino norms, which they described as closer to a nuclear family model and more supportive of women's independence. MFDWs' strategising therefore lay in selective compromise: accepting some restrictions while resisting others that threatened their autonomy and dignity.

Finally, a third long-term migrant woman, aged 49, had moved from domestic work into entrepreneurship, managing an MDW recruitment agency herself. As other participants, she strongly acknowledged her migration experience as overall empowering, at a personal and socio-economic level:

Moving to Pakistan was the best thing that happened to me because it changed my life completely. I moved up on the social ladder and that to me is a big achievement. Life in Pakistan is very comfortable.

Read through an intimate and affective labour lens, these collective and individual practices suggest that community building functioned as a vital form of care work beyond the employer's household: MFDWs mobilised affect and emotion as a strategic currency to survive isolation, build solidarity, and navigate the realities of live-in employment.⁷⁹ These trajectories reveal the complex interplay of constraint and resistance. While MFDWs remain structurally vulnerable in Pakistan, many simultaneously carve out spaces of independence, reshape their identities, and establish families and organisations, based on new gender terms.

Conclusions and Recommendations

This article has examined how MFDWs in Pakistan negotiate intersecting forms of labour, migration and household-based precarity while developing situated forms of agency. The study is exploratory and based on a small number of interviews, but it illuminates a largely overlooked South–South migration corridor in which domestic workers are neither simply victims of globalisation nor straightforward beneficiaries of labour migration. Their experiences are shaped by recruitment

⁷⁹ A R Hochschild, *The Managed Heart: Commercialization of Human Feeling*, University of California Press, Berkeley, 1983; Boris and Parreñas; Parreñas.

agencies, weak labour protections, immigration status, employer power, household intimacy, and racialised, classed and religious hierarchies.

The findings challenge simplistic western-centric and victimising accounts of Global South migration by foregrounding how women navigate, adapt to, and sometimes transform conditions of constraint.⁸⁰ Migration is both an outcome of structural violence and an ongoing process of incremental negotiation and self-making. Straddled between two social worlds, MFDWs embody the interstitial spaces where racialised, gendered, and class-based differences are constantly negotiated.⁸¹ Their circular mobility and agency-mediated recruitment reveal diverse and strategic trajectories of renewal and, for some, upward mobility.

At the same time, the Pakistan case must be situated within the wider political economy of Filipina domestic labour. Critical work on Filipina domestic workers shows that their global demand is built around a marketable image as English-speaking, educated, adaptable, caring, humble, and reliable. These attributes can create labour-market value, relative mobility, and opportunities for remittances, but they also reproduce gendered, racialised, and postcolonial hierarchies by associating Filipinas with subordinate care and domestic labour. This helps explain the ambivalent positioning of MFDWs in Pakistan: they may be valued above local domestic workers and associated with professionalism, foreignness, and status, yet their value remains tied to a feminised and socially devalued form of labour.

The Pakistan case complicates dominant accounts of migrant domestic work centred on *kafala*-like regimes. MFDWs remain formally excluded from robust labour protections, yet their access to written contracts, agency mediation, and some mobility between employers distinguishes their experiences from more restrictive sponsorship systems. They are also positioned differently from Pakistani domestic workers, who remain more deeply embedded in caste, class, religious, and gendered devaluation. At the same time, these relative advantages should not be overstated: dependence on employers, agencies, and weakly enforceable contracts continues to expose MFDWs to exploitation, job insecurity, limited redress, and isolation.

This article contributes to debates on domestic, care, and intimate labour by showing how intersecting harms are negotiated through both individual and collective practices. An intimate labour lens reveals why these harms cannot

⁸⁰ A Khan, *Women and Paid Work in Pakistan: Pathways of Women's Empowerment*. South Asia Research Programme Pakistan Scoping Paper, Collective for Social Science Research, Karachi, 2007.

⁸¹ K Kia Tehrani, 'Inhabiting Her Space: Lived Experiences of Iranian-American Women', *International Feminist Journal of Politics*, vol. 8, issue 3, 2006, pp. 413–427, <https://doi.org/10.1080/14616740600793051>.

be only understood through wages, contracts, or migration status: they are also produced through the household as workplace, the blurring of care and employment, emotional availability, employer discretion, and workers' proximity to family life. Participants changed employers, mobilised recruitment agencies, drew on church and community networks, founded associations, moved out of domestic work, entered entrepreneurship, negotiated marriage and religion, and selectively accepted or resisted Pakistani family norms. Read through this lens, MFDWs' agency was rarely expressed as open resistance or full independence; rather, it emerged through everyday practices of mobility, care, community-building, refusal, and self-making within unequal infrastructures of social reproduction.

Significant knowledge and policy gaps remain. Women's immigration to Pakistan is poorly documented, reflecting the wider assumption that Global South countries are not important destinations for migration. Yet this study shows that Pakistan is receiving women migrants whose legal, occupational, and family statuses can shift over time. Their presence has implications for labour regulation, gender norms, migration governance, and the future of domestic work.

This exploratory study points to areas that require more comprehensive research and policy attention, including the labour-law recognition of domestic work, regulation of recruitment agencies, improved data on women migrant workers, support for migrant women's associations, and intersectional gender approaches that account for class, religion, nationality, migration status, and employment position.

The case of MFDWs in Pakistan therefore highlights the need to analyse South–South migrant domestic work through structural precarity, situated agency, and intimate labour. Filipina domestic workers' trajectories show how global care markets, state migration regimes, household hierarchies, and women's own life projects become entangled. In doing so, the article speaks to this special issue's concern with the gendered organisation of labour, care, and mobility by showing how domestic workers' agency is forged within—rather than outside—the unequal infrastructures of social reproduction. Attending to this interplay is essential for advancing debates on gender, labour, migration, and social reproduction in the Global South.

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Short Articles

Dual Abandonment as Structural Violence in Intimate Labour: Migrant domestic workers in conflict zones

Sifat Aiman

Abstract

The abandonment of migrant domestic workers in conflict zones constitutes a distinct form of structural violence. This short article offers an initial exploration of *dual abandonment*—the violence produced when intimate labour relations break down as employers withdraw support and states fail to protect during armed conflict. Drawing on Johan Galtung’s framework of structural violence and foregrounding intimate labour as a key site of harm, it argues that armed conflict does not create this violence but exposes the gendered structural violence already embedded in care labour and migration governance.

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Introduction

Armed conflict is often visibilised through extreme violence such as bombings, destruction, and mass displacement. However, it also interacts with existing labour and migration systems to create less visible and more normalised harms for migrant domestic workers in sites of conflict. Migrant domestic workers, predominantly women from the Global South, occupy a distinctive position as providers of *intimate labour*—work performed within private households where access to housing, mobility, and legal status often depends on the employer. Notwithstanding labour law frameworks, their safety and security are largely contingent on the continuity of these employer–worker relationships that are often framed as ‘familial ties’. When conflict disrupts these social relations, workers experience a distinctive form of harm, conceptualised here as ‘dual abandonment’: a two-stage process in which employers withdraw support, followed by states’ failure to provide protection.

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Cases of abandonment have been reported during armed conflicts in Libya,¹ Syria,² and, more recently, the 2024 Israeli airstrikes in Lebanon.³ However, rather than through visible violence, migrant workers' harm in armed conflicts arises instead through the withdrawal of employer responsibility and state protection. These absences remain outside of anti-trafficking thresholds. Dual abandonment excludes cases where basic protections remain available or harm is effectively mitigated by state intervention.

While abandonment occurs across sectors, migrant domestic workers experience distinct risks due to the live-in nature of their work and the resulting dependence on their employers. Crucially, dual abandonment is not simply a governance failure but a form of violence that is produced through the intimate labour relation itself, which becomes particularly pronounced in armed conflict. Using Johan Galtung's theory of 'structural violence'⁴ as a theoretical lens, this article argues that armed conflict does not create this violence but instead exposes gendered power relations embedded in care labour and migration governance. The analysis combines academic literature, documented accounts from international organisations, and journalistic investigations.

Dual Abandonment as Structural Violence in Intimate Labour: A Galtungian Analysis

Dual abandonment, as conceptualised here, is a distinct manifestation of structural violence arising from the organisation of intimate labour under conflict. Drawing on Johan Galtung, this article shows how the dual abandonment of migrant

¹ MRRORS, 'Migrant Workers Caught up in Libya and Iraq Conflicts', *MRRORS*, 14 August 2014, <https://www.mrrors.org/2014/08/migrant-workers-caught-up-in-libya-and-iraq-conflicts>; Voice of America, 'Thousands of Migrant Workers Stranded in Conflict-Ridden Libya', *VOA News*, 7 June 2011, <https://www.voanews.com/a/thousands-of-migrant-workers-stranded-in-libya-123459619/158265.html>.

² C Healy, *Targeting Vulnerabilities: The Impact of the Syrian War and Refugee Situation on Trafficking in Persons – A Study of Syria, Turkey, Lebanon, Jordan and Iraq*, International Centre for Migration Policy Development, Vienna, 2015, pp. 177–179.

³ A Ekanayake, 'How Prepared is Sri Lanka's Foreign Employment Sector for a Sudden War in the Middle East?', *The Migrant*, 6 October 2025, <https://themigrant.data.blog/how-prepared-is-sri-lankas-foreign-employment-sector-for-a-sudden-war-in-the-middle-east/>; E Madi and J Campbell, 'Lebanon's Migrant Workers Stuck in Limbo as Thousands Flee Conflict', *Reuters*, 5 October 2024, <https://www.reuters.com/world/middle-east/lebanons-migrant-workers-stuck-limbo-thousands-flee-conflict-2024-10-05>.

⁴ J Galtung, 'Violence, Peace, and Peace Research', *Journal of Peace Research*, vol. 6, issue 3, 1969, pp. 167–191, <https://doi.org/10.1177/002234336900600301>.

domestic workers constitutes a patterned form of such violence.

During Israel's 2024 bombardment of southern Lebanon, a Kenyan caregiver was reportedly locked inside her employers' home after they fled; the intensity of shelling left her so traumatised that she could not recall how many days she remained alone.⁵ This account reflects Galtung's theory that violence can extend beyond bodily injury.⁶ It can also be psychological, taking the form of isolation, fear, uncertainty, helplessness, loss of agency, and deep insecurity. More broadly, it shows how harm occurs not only through direct force but through the withdrawal of support. When employers abandon their workers while fleeing armed conflict, workers lose housing, income, and legal status, which restricts their ability to change employers or seek safety. For example, during Yemen's 2011 uprising, Somali and Ethiopian cleaners dismissed without severance pay became jobless overnight as Yemen's labour law required written contracts for compensation.⁷ This highlights how states and employers extract care when workers are useful but deny them safety once they become a 'burden'. As Galtung suggests, this withdrawal is violent because it systematically suppresses life chances and prevents an individual from reaching their full potential.⁸

However, this harm transcends individual choices; it is built into the migration regime that binds workers to employers and denies them state protection. Specifically, dual abandonment is not an occasional failure but a patterned form of structural violence, built into the nature of intimate labour that is merely exposed during armed conflict.

Intimate Labour as a Site of Structural Violence

Migrant domestic work is a common form of intimate labour, as it entails both entry into the intimate sphere of the home and awareness of its inhabitants' habits.⁹ Workers often live and work in the same space, which blurs the distinction

⁵ M Khalil and E Shalaby, 'My Employers Locked Me in the House and Left When the Bombings Started', *BBC News*, 10 October 2024, <https://www.bbc.com/news/articles/cn7y8pz4jrvo>.

⁶ Galtung, p. 169.

⁷ N.A., 'Unrest Leaves Foreign Female Casual Workers High and Dry', *The New Humanitarian*, 19 April 2011, <https://www.thenewhumanitarian.org/news/2011/04/19/unrest-leaves-foreign-female-casual-workers-high-and-dry>.

⁸ Galtung, p. 170.

⁹ E Boris and R S Parreñas, 'Introduction', in E Boris and R S Parreñas (eds.), *Intimate Labors: Cultures, Technologies, and the Politics of Care*, Stanford University Press, Redwood City, 2010, pp. 1–12, p. 5.

between their status as employees and as residents of the household.¹⁰ Work responsibilities also extend beyond clearly defined tasks into expectations of loyalty, availability, and emotional engagement. These expectations are rooted in the gendered nature of domestic work—women are positioned as naturally caring, adaptable, and self-sacrificing—a framing that obscures the labour involved and normalises informality. For a migrant domestic worker, access to shelter, mobility, communication, and legal status is often tied to a single employer who may act simultaneously as supervisor, landlord, and migration sponsor. This dependency is institutionalised in systems such as the *kafala* regime in parts of the Middle East, where legal status is directly linked to the employer and workers face severe restrictions on changing jobs, leaving the country, or accessing independent protection.

These intersecting conditions produce a distinct form of economic dependency, relational constraint, and spatial confinement for migrant domestic workers. For them, the workplace, home, and legal presence in the host country converge in a single physical location—the employer’s household. Within this confined space, relations are often framed by a discourse of fictitious kinship, in which workers are sometimes described as ‘one of the family’.¹¹ The fragility of this relationship becomes visible when employers withdraw or flee, as the household is abruptly transformed from a site of care into a space of danger, where workers are immobilised. In this way, fictitious kinship reveals its instrumental function—workers are family and part of households only while they are useful. When a crisis strikes, they are abandoned without accountability, revealing how ‘family-like’ intimacy serves as a tool for exploitation. Unlike in other sectors, the collapse of the employer-worker relationship in care work simultaneously leaves workers unemployed, displaced, and immobilised. The abandonment during armed conflict makes visible how proximity and dependency are mobilised to extract labour, thus exposing the structural violence inherent within intimate labour relations.

Fragmented Responsibility, Intimate Labour, and the Governance of Abandonment

Responsibility for migrant domestic workers is fragmented across employers, as well as receiving and sending countries. Employers do not merely evade responsibility towards workers but deliberately abscond with passports¹² that

¹⁰ *Ibid.*; P Nadasen, ‘Power, Intimacy, and Contestation: Dorothy Bolden and Domestic Worker Organizing in Atlanta in the 1960s’, in *Ibid.*, pp. 204–216, p. 207.

¹¹ *Ibid.*

¹² M Edwards and J Sousa, ‘Lebanon’s Migrant Workers Left Stranded and Homeless by Israeli Attacks’, *The New Humanitarian*, 26 September 2024, <https://www.thenewhumanitarian.org/news-feature/2024/09/26/lebanons-migrant-workers-left-stranded-homeless-israeli-attacks>.

they routinely confiscated during peacetime,¹³ thereby complicating repatriation and prolonging the process indefinitely.

The failure of sending and receiving countries to protect migrant domestic workers is further amplified during armed conflict. Receiving states apply a hierarchy of protection based on citizenship, race, and geopolitical value. For example, during Israel's 2024 airstrikes in Lebanon, migrant domestic workers from Ethiopia, Sierra Leone, and Bangladesh were reportedly turned away from shelters, with more than seventy women expelled from a Tripoli school under a ministerial order because they were 'not Lebanese'.¹⁴ A similar incident was documented in March 2026, when African migrant domestic workers in Lebanon were denied access to shelters, excluded from emergency assistance, and abandoned by employers, forcing many to sleep outdoors or rely on informal networks for survival.¹⁵ This organised irresponsibility exemplifies structural violence where harm occurs because no actor is legally obliged to protect, resulting in systemic vulnerability even without a direct physical attack or an identifiable perpetrator.¹⁶ From an intimate labour perspective, this fragmentation reflects the selective construction of family boundaries. Migrant domestic workers are treated as 'inside' the family for labour purposes (care, intimacy, co-residence) but 'outside' the family for protection purposes (evacuation, survival, rescue).

This exclusion is compounded by sending states that ensure citizenship yet lack the mechanisms to enforce protection abroad. Specifically, there is documented failure to regulate recruitment agencies, ensure safe migration, or facilitate timely repatriation. Evacuation and repatriation are further complicated by resource constraints. First, a lack of consular presence creates protection gaps, as seen

¹³ R Jureidini and N Moukarbel, 'Female Sri Lankan Domestic Workers in Lebanon: A Case of "Contract Slavery"?', *Journal of Ethnic and Migration Studies*, vol. 30, issue 4, 2004, pp. 581–607, <https://doi.org/10.1080/13691830410001699478>; N.A., 'Saudi Arabia: Migrant Domestic Workers Face Severe Exploitation, Racism and Exclusion from Labour Protections', Amnesty International, 13 May 2025, <https://www.amnesty.org/en/latest/news/2025/05/saudi-arabia-migrant-domestic-workers-face-severe-exploitation-racism-and-exclusion-from-labour-protections>.

¹⁴ A Kelly and R Michaelson, "'Thrown Out Like Used Washing Machines": Lebanon's Migrant Workers Bear Brunt of Displacement Crisis', *The Guardian*, 11 October 2024, <https://www.theguardian.com/global-development/2024/oct/11/thrown-out-like-used-washing-machines-lebanons-migrant-workers-bear-brunt-of-displacement-crisis>; Khalil and Shalaby.

¹⁵ N.A., 'Africa's Abandoned Workers in Lebanon', *Al Jazeera*, 23 April 2026, <https://www.aljazeera.com/video/africa-now/2026/4/23/africas-abandoned-workers-in-lebanon>.

¹⁶ Galtung, pp. 170–171.

when Nepalese workers were trapped in Syria and Iraq.¹⁷ These risks led Nepal to ban employment in several conflict-prone countries after a deadly 2016 Taliban attack.¹⁸ Second, Global South states often lack the financial capacity to fund crisis repatriation, as illustrated by Bangladesh's reliance on a World Bank loan in 2020 to repatriate workers from Libya.¹⁹ These failures reflect a 'cycle of mutual deferral' among employers, states, and markets. This creates a systemic zone of non-responsibility where migrant abandonment becomes a predictable outcome, not an isolated accident.

International law does not impose a general duty on states to repatriate their nationals during armed conflicts or emergencies; instead, repatriation remains a discretionary consular function. Consequently, evacuation and repatriation become 'uneven and arbitrary',²⁰ shaped by political will, diplomatic capacity, and strategic priorities rather than enforceable duties. Yet receiving states may still incur responsibility where migration and labour regimes expose workers to foreseeable harm—through due diligence violations under human rights law, for example. Although the conditions enabling abandonment (confiscated passports, *kafala* dependence, exclusion from shelters) are frequently produced by private actors, states may be responsible where they facilitate, tolerate, or fail to regulate these practices—through deficient legal frameworks, non-enforcement of existing protections, or discriminatory emergency policies. In such cases, the wrongful act lies not in the failure to evacuate as such, but in states' own contributions to the structural conditions that render migrants vulnerable during crises.²¹

¹⁷ P Pattison, 'Nepalese Women Trafficked to Syria and Forced to Work as Maids', *The Guardian*, 1 January 2016, <https://www.theguardian.com/global-development/2016/jan/01/nepal-women-trafficked-syria-forced-domestic-labour>.

¹⁸ G Sharma, 'Nepali migrants banned from working in Afghanistan, Iraq, Libya and Syria', *Reuters*, 25 June 2016, <https://www.reuters.com/article/world/asia-pacific/nepali-migrants-banned-from-working-in-afghanistan-iraq-libya-and-syria-idUSKCN0ZA2X8>.

¹⁹ T Siddiqui and M R A Bhuiyan, *Emergency Return of Bangladeshi Migrants from Libya*, NTS Working Paper no. 9, RSIS Centre for Non-Traditional Security Studies, 2013, p. 33. <http://www.migratingoutofpoverty.org/files/file.php?name=nts-working-paper9.pdf&site=354>.

²⁰ T Mulder, R Jefferies, and J McAdam, 'Is There a Duty to Repatriate in International Law?', *EJIL: Talk!*, 2 July 2025, <https://www.ejiltalk.org/is-there-a-duty-to-repatriate-in-international-law>.

²¹ See generally: International Law Commission, *Draft Articles on Responsibility of States for Internationally Wrongful Acts, with Commentaries*, Doc. A/56/10, art. 49 (2001).

Conclusion

Galtung's framework challenges the idea that abandonment is simply a by-product of conflict by focusing on patterns rather than intent.²² It reveals the structural violence embedded within the intimate nature of domestic work and how migrant domestic workers' exclusion from evacuation and assistance is a result of hierarchical protection regimes rather than isolated coordination failures. This conceptualisation shifts accountability for dual abandonment from isolated events to recognising it as a form of structural violence. When migrant workers are repeatedly left without shelter or legal status, it points to institutional failure rather than individual misfortune. This harm is temporally layered: peacetime 'latent' violence, such as confiscated passports or denied labour rights, simply becomes 'manifest' during conflict. Recognising dual abandonment as structural violence necessitates moving beyond emergency-based protection toward a care-work governance framework that no longer conditions workers' safety on their continued labour or on the political stability of the host country.

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²² Galtung, pp. 171–172.

Child Domestic Work as Intimate Labour: Towards relational protection

Jonathan Blagbrough and Tsion Degu

Abstract

Child domestic work (CDW) is typically considered through narrow labour or trafficking framings that do not fully explain how harm and protection are produced inside employing households. Drawing on the learnings from a Freedom Fund project in Ethiopia, this short article argues that CDW should, instead, be addressed by paying closer attention to household hierarchies, everyday care practices, and the role of employers and employers' children in shaping the lives of child domestic workers. We argue that three shifts are needed: researchers should measure dignity and belonging alongside harm; programme designers should engage households, including children, as part of change efforts; and policymakers should connect household-level change to legal recognition, regulation, and social protection.

Keywords: child domestic work, intimate labour, employing households, children's agency, dignity, belonging, Ethiopia

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Introduction and Framing

Child domestic work (CDW) is commonly approached as a child labour issue and, in some cases, as child trafficking or domestic servitude.¹ These framings do not fully explain how risk, harm, and change are manifested inside employing households. Many child domestic workers' lives are shaped not only by hours, pay, and tasks, but also by relational questions: who they eat with, where they sleep, whether they are spoken to with respect, whether they can contact their

¹ N Klocker, 'Struggling with child domestic work: What can a postcolonial perspective offer?', *Children's Geographies*, vol. 12, issue 4, 2014, pp. 464–478, <https://doi.org/10.1080/14733285.2013.827870>.

families, and whether they are treated as workers, dependents, or something ambiguously in-between.

A relational lens, which focuses on how household relationships and everyday social practices shape children's experiences of work, care, exclusion, and protection, does not soften the reality of abuse or suggest that harmful arrangements should be accepted. Rather, it helps explain why generalised legal and policy responses are often insufficient in protecting children in these situations. Many children enter domestic work through kinship obligations, rural-urban migration imperatives, or family strategies tied to schooling, survival, or delaying marriage.² Yet these same relational arrangements can expose them to dependence, exclusion, and exploitation, especially when employers present poor treatment as care or opportunity. A relational perspective therefore complements, rather than replaces, labour and protection frameworks by showing how exploitation is sustained or challenged through everyday household practices.

Definitional and measurement problems reinforce these policy blind spots. Live-in child domestic workers are often poorly captured in national surveys,³ and kinship placements may be described as 'help' or 'chores' rather than work.⁴ Responses centred only on awareness-raising, raids, or removal can miss the realities of children whose lives are embedded in households and communities.⁵ Likewise, treating formal schooling as the only meaningful route out can overlook adolescents' own priorities, including safety, family contact, dignity, and manageable working conditions.

This short article outlines the value of a relational lens to CDW, then uses the Freedom Fund's Ethiopian Nigat ('Dawn') project to show what this looks like in practice, before drawing out three implications for research, programme design, and policy.

² Freedom Fund, *Child Domestic Work: Summary framing paper*, Freedom Fund, 2021, <https://freedomfund.org/our-reports/child-domestic-work-summary-framing-paper>.

³ *Ibid.*

⁴ R Musizvingoza, J Blagbrough, and N S Pocock, 'Are child domestic workers worse off than their peers? Comparing children in domestic work, child marriage, and kinship care with biological children of household heads: Evidence from Zimbabwe', *International Journal of Environmental Research and Public Health*, vol. 19, no. 12, 2022, pp. 7405, <https://doi.org/10.3390/ijerph19127405>.

⁵ P Olayiwola, "Killing the Tree by Cutting the Foliage Instead of Uprooting It?" Rethinking awareness campaigns as a response to trafficking in South-West Nigeria', *Anti-Trafficking Review*, issue 13, 2019, pp. 50–65, <https://doi.org/10.14197/atr.201219134>.

A Relational Lens on CDW

Understanding CDW relationally means starting from the everyday politics of age, gender, status, and belonging within employing households.⁶ Children may be described as ‘like family’, while sleeping separately, eating leftovers, working long hours, or having little say over their lives. Such a framing can hide exploitation, but it can also reveal where change is most likely to happen: in household routines, in relations between adults and children, and in the social norms that govern who deserves rest, privacy, food, schooling, and care.⁷

Research has shown that relationships between child domestic workers and employers’ children can be ambivalent but important.⁸ They are often unequal and shifting rather than straightforward friendships, yet they can still affect comfort, mobility, access to information, and emotional support. For that reason, employers’ children should not be treated as peripheral to interventions. They can reinforce household hierarchies, but they can also help disrupt them.

The Ethiopian Nigat Project

The Freedom Fund’s Nigat project in Addis Ababa was designed around this relational insight. Implemented over three years with local partner organisations, it worked with employers, employers’ children, schools, *iddirs* (neighbourhood associations), and *woreda* (district)-level actors to improve the living and working conditions of child domestic workers and to strengthen local protection and reporting pathways. A key component was a participatory school-based curriculum for employers’ children, aimed at building empathy, strengthening child rights awareness, and encouraging action within households, schools, and communities. The project also worked through neighbourhood structures and local duty bearers to strengthen local accountability, while supporting child domestic workers’ own participation and voice. In contrast to more conventional interventions focused primarily on identification and removal from CDW, the programme aimed to sustainably improve children’s everyday living and working conditions by engaging directly with the relational and social environments shaping their experiences.

⁶ N Klocker, ‘Negotiating Change: Working with children and their employers to transform child domestic work in Iringa, Tanzania’, *Children’s Geographies*, vol. 9, issue 2, 2011, pp. 205–220, <https://doi.org/10.1080/14733285.2011.562381>.

⁷ Freedom Fund.

⁸ J Blagbrough, ‘Not-Quite-Friendship: Exploring social relations between child domestic workers and the children of employing families’, *Children’s Geographies*, vol. 21, issue 2, 2023, pp. 347–360, <https://doi.org/10.1080/14733285.2022.2067742>.

Evaluation of the project used longitudinal qualitative methods, including Photovoice with child domestic workers; interviews with child domestic workers, employers, and employers' children; and discussions with wider stakeholders. This approach was important because it allowed children to define what meaningful change looked like in their own lives. Their priorities extended beyond conventional child labour indicators and included sleeping safely, eating properly, being treated with respect, staying in touch with family, and having support to attend school.⁹

Households reached by the project reported several improvements in child domestic worker well-being. Children described better sleeping arrangements and mealtime inclusion, while the evaluation also documented reductions in verbal and physical abuse, less social isolation, and improved relationships with employers and employers' children. School enrolment increased substantially through both formal schooling and alternative basic education options adapted around domestic responsibilities. However, important challenges remained. Many children still worked long hours, averaging about eight hours per day (reduced from nine), while informal arrangements persisted, with many children receiving little or no direct pay or having earnings transferred to their families. These patterns were especially evident in lower-income households, where employers' own economic pressures reinforced continued reliance on children's labour.

The project's broader lesson is therefore not that household-level change is enough, but that it matters. For the children involved, dignity and belonging were not secondary issues; they were among the clearest signs that life was becoming safer and more liveable. Measuring whether a child is still working tells us something important, but it does not tell us enough. Research and evaluation need to capture whether and how children are resting, eating, learning, being heard, and experiencing a meaningful reduction in fear and exclusion.

Conclusion: Towards relational protection in child domestic work

The Nigat project offers a useful roadmap for relational protection in child domestic work—which, like other forms of intimate labour, blurs conventional boundaries between work, care, family, and exploitation. First, for researchers and evaluators, children's own priorities should shape what counts as change. Indicators of dignity, belonging, family contact, and reduced isolation should sit

⁹ N Kram-Brooks and T Mersha, *Ushering Change and Transforming Lives: An evaluation of the Nigat project to shift household attitudes and norms towards child domestic workers in Addis Ababa, Ethiopia*, Freedom Fund, 2025, <https://www.freedomfund.org/news/ushering-change-transforming-lives>.

alongside more conventional concerns such as working hours, pay, and schooling. Second, for project designers and implementers, interventions need to work inside the household as well as around it. This means engaging employers and employers' children, using schools and community structures to challenge harmful norms, and creating space for child domestic workers to define and advocate for the changes that matter to them. Third, for policymakers, household-level improvements need to be backed by stronger formal protections. That includes recognising domestic work in law, clarifying standards for adolescents in domestic work, and linking vulnerable households to wider social protection so that responsibility for change does not rest on behaviour change alone.

Approaching CDW through a relational protection lens does not mean lowering the threshold for what counts as harm. It means seeing more clearly where harm is reproduced, how children themselves understand change, and why durable protection requires attention both to structural regulation and to the intimate social worlds in which child domestic workers live and work.

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Book Review: Performing intimate inequality

Sonja Dolinsek

Abstract

Review of the book *Intimate Inequalities: Performing Migrant Domestic Work* by Ella Parry-Davies, Northwestern University Press, 2025, ISBN: 9780810149090, 232 pages.

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What might a performance researcher contribute to the study of Filipino migrant domestic workers in Lebanon and the United Kingdom? Ella Parry-Davies's *Intimate Inequalities: Performing Migrant Domestic Work* shows that the answer is: quite a lot. Bringing together theoretical and methodological insights from performance studies, migration studies, feminist scholarship, and labour history, Parry-Davies has written a book that advances questions of method, reflexivity, and the production of knowledge in important ways.

As Parry-Davies writes in the introduction, 'intimate inequalities' name both the 'object of study' and a 'methodological inquiry'. On the one hand, the phrase refers to the unequal intimacies that structure domestic labour: bodily proximity, care, dependency, and the language of family, all of which are shaped by race, gender, class, and migration status. On the other hand, the phrase directs attention to the conditions under which research itself takes place. Research, too, is structured by intimacy and inequality. In this sense, Parry-Davies treats performance as both a 'method of collaborative practice research' and a lens through which to examine the 'intimate inequalities of research itself' (p. 5)—'researching (through) performance' (p. 10). In this sense, collaborative research itself can also be understood as an intimate research practice.

In her book, Parry-Davies explores how migrant domestic workers in Lebanon and the UK navigate and portray their lives shaped by various practices of unequal intimacies, including singing, dancing, listening, gossiping, caring, cleaning, protecting, joking, teaching, flirting, sharing meals, protesting, worshipping,

walking, recording, and editing. Rather than uncovering authentic experiences, the author is interested in how workers intentionally represent their lives—how they tell, stage, edit, and frame their stories. Additionally, she explores insights from performance-based collaborative research, focusing on aspects that traditional policy analysis, legal critique, or standard ethnography often miss. These questions link her work to scholarship on the global care chain, social reproduction, migrant domestic work, Philippine labour brokerage, and activism against the *kafala* migration sponsorship system in Lebanon and the UK overseas domestic worker policies. Her approach shifts focus beyond employers' homes and courtrooms to sites like nightclubs, churches, marches, markets, beaches, and artistic projects—places where domestic workers build social worlds during their days off. These spaces reveal forms of labour, mobility, and politics that vanish when domestic work is studied solely inside the household. Churches offer routine, safety, and community; markets transform global labour relations into sensory exchanges; beaches and parks highlight leisure, rest, and public visibility; marches make domestic workers visible as political agents. Through these settings, Parry-Davies reconstructs the urban spaces inhabited by migrant domestic workers in Beirut and London, demonstrating that domestic labour extends beyond the private homes where it occurs.

Using co-created 'site-specific soundwalks' as her preferred method, Parry-Davies turns performance into both archive and analysis.¹ The soundwalks demonstrate how migrant domestic workers in Lebanon and the UK tell, stage, and interpret their own lives beyond policy discussions and humanitarian frames. This method also shapes the relationship between the researcher and the subject of their study. Parry-Davies does not see herself as separate from the field she examines. Instead, she critically reflects on how academic knowledge is produced and on her own role in this process. The book conceives of research as a performative practice characterised by intimacy and inequality, in which all research encounters are performances structured by roles, expectations, access, and power, creating their own form of intimate inequality. Therefore, Parry-Davies considers researchers and universities as part of the field and even as resources that collaborators can use for their own purposes—such as advocacy letters, payment, conference appearances, documentation, references, or public exposure. This is one of the book's most powerful methodological contributions, where reflexivity is not just a brief statement of positionality but an integral part of the methodology and analysis.

¹ The recordings and transcripts of the soundwalks can be found here: <https://homemakersounds.org>. See also E Parry-Davies, 'Modern Heroes, Modern Slaves? Listening to Migrant Domestic workers' Everyday Temporalities', *Anti-Trafficking Review*, issue 15, 2020, pp. 63–81, <https://doi.org/10.14197/atr.201220154>.

Parry-Davies does not treat intimacy as synonymous with embodied proximity or sexual closeness, nor does she confine it to the private sphere. Instead, she argues that the idea that intimacy naturally belongs to the private household is itself a historical construction and that intimacy is ‘fully bound to material and political conditions’ (p. 8). This is where the book’s engagement with feminist scholarship on social reproduction helps illuminate how domestic labour sustains life, households, and the work of others yet is often devalued because it is labelled as natural, feminine, familial, and private. Parry-Davies draws on this scholarship while also expanding it through performance studies.

Each chapter uses one or more soundwalks as a starting point to analyse a different dimension of migrant domestic workers’ lives. By bringing the analysis of the soundwalks into conversation with media discourse, NGO reports, policy documents, and other archival and political material, Parry-Davies shows how performance can function both as a method and as an analytic frame. The chapters move between questions of labour, migration, urban space, disability, queerness, politics, and justice, while repeatedly returning to the book’s central concern: ‘how the unequal intimacies of domestic labor are navigated and represented by migrant domestic workers themselves’ (p. 11). Chapter 1 lays out the comparative and historical frame of the book by placing Philippine labour export, Lebanon’s *kafala* system, and the UK’s overseas domestic worker visa in one analytic field. Here, Parry-Davies develops the arguments that Lebanon and the UK should not be treated as opposite cases, since both systems tie workers to employers and restrict access to settlement, and both emerge from longer colonial histories shaped by British imperialism. Chapter 2 turns to dominant representations of Filipino migrant domestic workers as either ‘modern heroes’ or ‘modern slaves’, and shows how both frames flatten workers’ own acts of self-representation. Chapter 3 shifts to urban space and movement, examining the ‘storied spaces’ through which migrant domestic workers move in Beirut and London as workers, activists, pilgrims, and travellers. Chapter 4 brings disability studies and crip theory into the analysis of domestic labour, showing how bodily pain, injury, and exhaustion are central to the experience of care work. Chapter 5 turns to homemaking, solidarity, and politics in moments of crisis, especially Lebanon’s 17 October Revolution in 2019 and the early months of the COVID-19 pandemic in the UK, before the epilogue returns to the problem of justice and the limits of legal recognition.

Chapter 2 most directly addresses the concerns of this issue of *Anti-Trafficking Review*, as it delves into how Filipino migrant domestic workers are portrayed through two main figures: *bagong bayani*, representing the Philippine state’s depiction of migrant workers as ‘modern heroes’, and the ‘modern slave’ prevalent in humanitarian, media, and legal discourse. Parry-Davies argues that these figures function similarly, both depicting migrant workers as symbols of sacrifice and shifting focus away from labour as a structural relationship. She demonstrates how the discourse of *bagong bayani* situates migrant workers within narratives of

service, suffering, and patriotism promoted by the state. Evidence of abuse does not weaken this heroic narrative but often reinforces it, as suffering becomes a testament to sacrifice for family and nation. In this context, Parry-Davies critically engages with the ‘modern slavery’ discourse, which, even as it has contributed to exposing exploitation in Lebanon and the UK, particularly through campaigns against *kafala* and tied visa regimes, constructs narratives through highly individualised stories of suffering. In this context, she introduces her concept of ‘dramaturgies of identification’ (p. 65), which are representational forms designed to elicit identification with suffering individuals by asking viewers, readers, or listeners to relate emotionally. Building on existing scholarship on humanitarian and anti-trafficking discourse, Parry-Davies argues that these narratives often focus on pity, shock, and rescue, which can unintentionally overlook broader issues of labour and migration. She illustrates this with her analysis of the UK’s National Referral Mechanism, where workers must demonstrate abuse in ways that meet bureaucratic standards of authenticity. Recognition depends on convincingly showing injury to satisfy officials, caseworkers, and immigration authorities. The chapter’s main case study is Amara’s soundwalk, ‘we are workers’, where Parry-Davies’s methodological approach is particularly effective. Amara selected Piccadilly Circus because she had once slept there after fleeing her employers and finding herself undocumented and homeless in London. However, she does not address the listener as a victim seeking sympathy; instead, she addresses the listener as someone who might become an ally. Consequently, the soundwalk fosters a different dynamic between speaker and listener. By shifting the focus from individual suffering to a collective political message, it resists both the nationalist rhetoric of heroic sacrifice and the humanitarian language that frames victims as passive, even though the tensions created by the hero/slave dichotomy are never fully resolved.

Overall, *Intimate Inequalities* is a methodologically ambitious and intellectually generous book. It offers a conceptually and narratively dense reading to which this review can only do limited justice. Its strength lies in how it combines performance, domestic work, unfree labour, and researcher reflexivity without reducing migrant domestic workers to victims or symbols. It provides a compelling way to think about trafficking, coercion, and constrained labour while also taking seriously the forms of agency, representation, and self-fashioning through which workers navigate the world. As a historian, I especially valued the book’s broader temporal scope and its sociohistorical grounding. Parry-Davies places migrant domestic worker migration from the Philippines within histories of colonialism, neoliberal restructuring, dictatorship, and labour export. She also presents a strong comparative argument about Lebanon and the UK. Instead of treating the *kafala* and British visa systems as separate or opposing cases, she shows that they both share colonial roots in British imperialism and obscure the intimate nature and inequalities of domestic work across the private–public binary. By situating current migration regimes within longer histories of empire, labour control, and uneven mobility, this historical perspective greatly strengthens the book’s overall argument about the political nature of intimate inequalities.

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