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# An Untenable Space: The Domestic Labor Sector as a Site of Forced Labor for Migrants

**Problem representations and framing processes within Civil Society in  
Singapore**

Author: Amanda Muñoz Gamage  
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Supervisor: Axel Fredholm

# Abstract

As one of the primary countries of destination for migrant domestic workers in Asia, Singapore is a developed country with one of the highest standards of living in the region. Yet, the city-state has been on the receiving end of extensive criticism concerning the rights and protections of migrant domestic workers. Civil society organizations have been one of the loudest critics, and in recent public demands for change, two organizations have put forward new and controversial claims. This study centers on the two reports produced by HOME & Liberty Shared and RAB, which frame migrant domestic workers as victims of forced labor. The objectives of this study are to assess these claims by identifying and critically discussing the general problem representations inherent in the reports and by analyzing the manner in which these organizations engage in framing processes. Additionally, the study aims to examine the inevitable tensions produced between the civil society organizations and the Singapore government. Through inspiration from a 'what's the problem represented to be' framework as well as frame analysis, the reports are analyzed using the theoretical concepts of isomorphism, a continuum approach and strategic essentialism. The findings suggest that the organizations differ in their problem representations, that there are fundamental tensions between the worldviews of the organizations and those of the state and that the intentional framing strategies utilized by the organizations do not adequately take into account the complexity of the subject of forced labor, which the Singapore state exploits when dismissing their claims.

*Key words:* Civil society, Migrant domestic workers, Singapore, Isomorphism, Problem representations, Framing

*Word count:* 10288

# List of Abbreviations

MDW	Migrant Domestic Worker
FLFPR	Female Labor Force Participation Rate
CSO	Civil Society Organization
TWC2	Transient Workers Count 2
HOME	Humanitarian Organization for Migration Economics
RAB	Researchers Across Borders
WPR	What's the Problem Represented to be
ILO	International Labor Organization
EA	Employment Act
SAP-FL	Special Action Program to Combat Forced Labor
OB	Out of Bound
ISA	Internal Security Act
ACMI	Archdiocesan Commission for the Pastoral Care of Migrants
MOM	Ministry of Manpower
NGO	Non-governmental Organization
PAP	People's Action Party
UDHR	Universal Declaration of Human Rights
UN	United Nations
EFMA	Employment of Foreign Manpower Act

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# 1. Introduction

In recent decades, there has been a shift in international labor migration patterns with an increasing number of women from developing countries seeking low-skilled and low-waged work as migrant domestic workers (MDWs) in developed countries around the world. Sassen (2006, p. 30) attributes this global feminization of migration to the development of rapid growth sectors, i.e. ‘global cities’ that serve as magnets for migrant women. The city-state of Singapore has such global city aspirations (Huang, 2015) that can be traced back to the mid-1960s when the newly independent country embarked upon an industrialization process. With a steady increase in the female labor force participation rate (FLFPR), a ‘care gap’ was in turn created in Singapore homes (Yeoh & Huang, 1998). Against this backdrop, Singapore experienced a rising demand for waged domestic care work. To further encourage the increased participation of local women in the formal labor sector, the Singapore government introduced The Foreign Maid Scheme in 1978, which allowed migrant women from nearby developing countries such as the Philippines, Indonesia, Myanmar and Sri Lanka to work as live-in domestic workers in the homes of local families (ibid). As a direct result of this shift in migration policy, the newly-developed city-state has rapidly become one of the primary destination countries for female migrants who wholly occupy the domestic labor sector. In 2018, an estimated 250,000 MDWs were living and working in Singapore, meaning that roughly one out of five households employs a domestic worker (Ministry of Manpower, 2018a; Shrestha, 2014).

One of the most debated effects of contemporary labor migration streams is the global exploitation of MDWs. MDWs are considered a particularly vulnerable group due to their gender, temporary status and the isolated and controlled nature of their work (Yeoh, Huang, Deyasahayam, 2004). Since the late 1990s, a growing number of domestic scholarly work with a focus on MDWs, as well as external criticism from international organizations such as Human Rights Watch and Amnesty, have drawn attention to the inadequacies of regulatory measures, the reach of the law and the slight concern of the Singapore government in implementing sufficient standards and regulations that safeguard the welfare of migrant workers. Although the civil society sector in the city-state remains both small and restricted, civil society organizations (CSOs) have recently begun to take on a significant role when it comes to the protection of migrants’ rights. Particular tensions have arisen between the CSOs and the Singapore government regarding the extent of the rights of MDWs. Furthermore, recent claims

by CSOs have also pointed to the existence of ‘forced labor’ within the domestic labor sector and argued that, contrary to popular belief, its manifestation can involve documented workers and occur even in highly regularized and managed countries such as Singapore (HOME & Liberty Shared, 2019). These claims could potentially pose a problem to the Singapore state that has, for the most part, remained relatively unbending to the CSO’s previous demands for change. Due to the novelty of these forced labor claims, studies have yet to critically examine or address them.

## 1.1 Research Problem

The end of the 20<sup>th</sup> century saw the wide national and international coverage within mainstream media of the rise in extreme cases of abuse and exploitation against MDWs in Singapore. During this time, the problems facing MDWs shifted from virtual invisibility to a subject of public attention. One factor behind this shift was the establishment of Transient Workers Count 2 (TWC2) and the Humanitarian Organization for Migration Economics (HOME) at the turn of the century. TWC2 and HOME are the principal local CSOs that work to advocate for the rights and dignity of migrant workers in Singapore. Yeoh & Annadurai (2008) emphasize the importance of local CSOs in Singapore and claim that as they have grown larger, they have been able to exert further pressure on the state to improve policy measures that protect migrant workers. Although scholars, international organizations and CSOs have addressed the exploitative nature of the domestic labor sector in Singapore since the late 1990s, it is only in the past three years that civil society has started to frame the domestic labor sector in terms of ‘forced labor’. In 2017, an international, Sidney-based research-oriented CSO called Researchers Across Borders (RAB), published a report exploring the extent and practices of labor exploitation in the migrant domestic labor sector wherein they identified 60% of MDWs as exploited and 23% as victims of forced labor (RAB, 2017). In early 2019, local civil society organization, HOME, together with a Hong Kong-based nonprofit, Liberty Shared, published a joint report that also frame MDWs as victims of forced labor (HOME & Liberty Shared, 2019). In addition, both reports by RAB and HOME & Liberty Shared make various policy suggestions as well as recommendations to alter existing state policies pertaining to MDWs in Singapore. These reports can therefore be considered “‘*prescriptive texts*’ since they tell us what to do” (Bacchi, 2009, p.34). A ‘what’s the problem represented to be’ (WPR) approach views all policy proposals as containing inherent problem representations. An examination of policy proposals and suggested interventions thereby reveals how the problem is understood and conceived (Bacchi, 2009). Since CSOs are considered to be important and influential actors

(Yeoh & Annadurai 2008; Lyons, 2009) in a highly regulated city-state where MDWs are prohibited from mobilizing, these organizations function as representatives for the voices of MDWs. Hence, there is value in exploring the claims advanced by the CSOs by looking at the problem representations and framing processes within the published reports as well as the ‘world models’ inherent within the international frameworks that the CSOs base their claims on.

## 1.2 Aim and Research Questions

The purpose of this thesis is threefold. The first part of the study aims to critically examine how HOME & Liberty Shared and RAB understand and represent the general problems concerning MDWs to be. By drawing inspiration from a WPR approach, I attempt to identify the *implicit* problem representations in the policy proposals presented in the two reports by the CSOs. The second part of the study seeks to extend beyond merely identifying the implicit problem representations, to critically explore the *intentional* framing of MDWs as victims of forced labor in the two reports. Although the focus of this research is on the reports by the CSOs in question, it is imperative to consistently contrast the perspectives of the CSOs with that of the Singapore government due to the specific sociopolitical context in Singapore that the CSOs operate within. To this end, the following research questions are generated:

- 1) *What do civil society organizations such as HOME & Liberty Shared and RAB represent the problems facing migrant domestic workers in Singapore to be?*
- 2) *How do these civil society organizations frame migrant domestic workers as victims of forced labor?*
- 3) *What tensions are created by the different positions adopted by the CSOs versus the Singapore state?*

### 1.3 Relevance and Delimitations

The city-state of Singapore has been selected because it contains the second largest documented concentration of domestic workers in the Asia Pacific region (HOME & Liberty Shared, 2019). Although the city-state is governed by a strong state with autocratic tendencies, the recent development of CSOs is viewed as a crucial step in challenging rigid state discourses regarding migrant workers in Singapore. The thesis intends to both review and build upon existing research by extending into an area that has not yet been covered. This study aims to contribute with a critical analytical perspective on recent discourses presented by CSOs regarding the existence of forced labor within the domestic labor sector in Singapore. In addition, the thesis problematizes discerned assumptions in the reports, regarding the spread and attempted implementation of isomorphic ‘world models’ in context specific settings through the case study of Singapore.

The reports in question by HOME & Liberty Shared and RAB are rather detailed and 72 and 126 pages long respectively. It is outside the bounds of this research to explore the reports in their entirety. Thus, in line with the research purpose, I specifically chose the main policy proposals suggested in the reports and selected the most recurring framing processes I could identify. An additional limitation with a case study design is the lack of external validity (De Vause, 2001, p.273). Since the research is highly contextual and situated, the study cannot be generalized to a wider population, nor can it be exactly applied to other contexts (Bryman, 2015, p.69-70). Nonetheless, there is value in exploring the specific case of Singapore precisely since both HOME & Liberty Shared and RAB apply International Labor Organization (ILO) frameworks that *are* meant to be applied in different contexts on a global-scale.

### 1.4 Disposition of thesis

The subsequent sections of the thesis are organized in the following way. The second chapter consists of the literature review and informs the reader about previous studies relevant to this research. Chapter three provides a context-specific background of the Singapore case and begins by describing the existing international labor rights frameworks relevant to the research. It continues to describe the role of local CSOs with a focus on HOME and finally examines the clash between universal notions of individual human rights in relation to the Singapore state’s anti-West rhetoric. Chapter four introduces the theoretical concepts that guide the analytical section of the thesis, which include the three theoretical concepts of

*isomorphism* and the accompanying notion of world models, *the continuum approach* and *strategic essentialism*. Chapter five introduces the methodology and provides motivation for the study's research design as well as the use of a WPR framework in combination with frame analysis. Chapter six is the core section of the thesis and analyzes the two reports by HOME & Liberty Shared and RAB. The analysis is divided into two parts. The first part of the analysis pertains to the general problem representations identified in the policy proposals. This section applies the concept of isomorphism and links the analysis to the themes touched upon in previous sections of the thesis. The second part of the analysis involves the specific framing of MDWs as forced workers, and both the continuum approach and strategic essentialism are applied here. The final chapter summarizes and discusses the key findings of the thesis and attempts to embed the study in a broader context.

## 2. Survey of the field

### 2.1. Global trends in domestic labor migration

As a result of structural changes in the global economy in a rapidly globalizing world, scholars have identified an international transfer of care and reproductive labor, and the subsequent creation of global 'care-chains' (Yeoh, Huang & Devasahayam, 2004; Salazar Parreñas, 2000; Hochschild, 2000). That is, women in global cities who, due to patriarchal structures and gender relations, would traditionally have undertaken the domestic and reproductive work in the household, are today pursuing careers whilst transferring domestic and reproductive duties onto migrant women. Simultaneously, an *informalization* of work is occurring in global cities as labor is being relocated to private settings where labor costs are lower and work conditions are less subject to regulation (Sassen, 2006, p.30-31). Governments are consequently leaving the wages, work conditions and regulation of MDWs to both market forces and the individual employer. In other words, a commodification of care is occurring, with care work increasingly being defined as a marketable product. The commodification of care, coupled with the informalization of work is in turn producing a new class of women workers that are especially vulnerable to exploitation and isolation (Sassen cited in Zimmerman, Litt & Bose, 2006, p.21). Lindio-McGovern (2012, p.11) argues in the same vein, that the commodification of labor is further intensified under the neo-liberal regime where policies linked to deregulation, liberalization and privatization strip away protective measures for labor. Hence, these policies

are believed to be creating enabling conditions that result in substandard work conditions for migrant workers where exploitation is rife (ibid).

## 2.1 Policy and state-enabled exploitation

Scholars have covered several topics related to MDWs in Singapore and publications have focused on gendered dimensions tied to migration flows (Yeoh, Huang & Willis, 2000); how MDWs negotiate their diasporic identity in the city-state (Yeoh & Huang, 2000); the recent development of civil society in Singapore with regard to MDWs (Yeoh & Huang, 1999; Yeoh & Annadurai, 2008; Lyons, 2009); and recent quantitative studies have also investigated the impacts of stress and isolation on the health and quality of life of MDWs (Anjara et al, 2017). The two key Singaporean scholars with extensive publications concerning MDWs in the Singapore context are Brenda S.A. Yeoh and Shirlena Huang. Much of their work has centered specifically on the limitations in Singapore laws and state policy that, on the one hand, limit the rights of MDWs, and on the other, enable both exploitation and what has been referred to as ‘maid abuse’ to occur. Yeoh (2006) illustrates the existence of a bifurcated migration policy wherein highly-skilled expats enjoy an ‘open door policy’ with privileges and benefits akin to those of Singaporean nationals, while those same migration policies disadvantage and constrict low-skilled migrant workers. Rahman, Yeoh & Huang (2005, p.238), further identify the extent to which the state enforces draconian measures to manage MDWs as *temporary* and *controlled* economic subjects through the work permit system. For instance, holders of the renewable two-year work permits are unable to apply for permanent residency nor are they allowed to marry a Singaporean national or a permanent resident, which prevents them from remaining in the country long-term. In addition, MDWs are placed under heavy control and surveillance through mandatory biannual medical check-ups to control for pregnancy or the contraction of venereal diseases or HIV, which would constitute a breach of the conditions of the work permit and lead to unilateral repatriation (Yeoh, Huang & Devasahayam, 2008; HOME & Liberty Shared 2019). Yet another significant factor to consider is the exclusion of MDWs from the Employment Act (EA), which is Singapore’s main labor law. The Singapore government’s refusal to grant MDWs with fundamental terms and working conditions as stipulated in the EA is recognized as one of the primary reasons behind the prevalence and continuation of exploitative practices (Huang & Yeoh, 1996). Whilst the subject of exploitation of MDWs in Singapore is widely covered, there is as of yet no current mention of terms such as ‘forced labor’ or ‘trafficking’ *vis-à-vis* MDWs within academic literature and the very proposition of its existence in the city-state is in itself a highly contentious subject.

## 3. Background

The following chapter will describe the key ILO conventions related to forced labor, give an overview of the development of civil society in Singapore and situate their current work in the sociopolitical context that they operate within. The section will also contrast the organizations' currently shifting trajectories from a local to a transnational focus with the anti-West position that the Singapore state tends to adopt.

### 3.1 International labor rights frameworks

The ILO is the primary UN agency responsible for the global setting of decent labor standards by uniting 187 member states, their governments, employers and workers. According to ILO estimations, over 40 million people were at any given time, victims of modern slavery in 2016 and 62% of all victims of modern slavery were located in the Asia Pacific region (ILO, 2017). Modern slavery can manifest in different forms, including as forced labor, debt bondage or bonded labor, human trafficking and forced marriage. There is a tendency to associate forced labor with human trafficking, which is rooted in the widespread misconception that forced labor has to involve physical restraint and the illicit movement of people. However, the terms carry distinct meanings and not all forced labor is necessarily a result of human trafficking (Skrivankova, 2010; Lerche, 2007). The ILO has produced two key conventions on forced labor, i.e. the C029 Forced Labor Convention signed in 1930, and the C105 Abolition of Forced Labor Convention signed in 1957. While Singapore ratified both the C029 and the C105 Conventions when the country joined the ILO as a member state after gaining independence in 1965, the city-state later conveniently denounced the C105 Convention in 1979 around the same time that the government introduced the Maid Scheme policy (HOME & Liberty Shared, 2019). The ILO Convention No. 29 provides the most frequently cited definition of forced labor as, “(...) *all work or service which is exacted from any person under the menace of any penalty and for which the said person has not offered himself voluntarily,*” (ILO, 1930). In other words, a worker is believed to be in a forced labor situation if they are coerced into entering an employment situation against their will and unable to leave without penalty or threat of penalty. However, more recent ILO (2009a) publications recognize that if elements of fraud and deception are involved, a worker's initial consent is irrelevant when they later discover that they are unfree to withdraw their labor.

In addition to the ILO definition of forced labor, various other ILO frameworks or typologies exist with respect to the identification of forced labor, including the ‘Hard to See, Harder to Count’ (ILO, 2012a), the ‘Operational Indicators of Trafficking in Human Beings’: Results from a Delphi Survey (ILO, 2009b) and the ILOs Special Action Program to Combat Forced Labor (SAP-FLs) 11 indicators of forced labor (ILO, 2012b). Whilst various aspects within the frameworks overlap, the typologies utilize different methods to identify forced labor. Hence, whilst the ILO has provided a definition of forced labor as well as several frameworks, the subject of forced labor remains a complicated issue that is difficult to quantify and measure. Within academia, these ILO typologies have also been subject to considerable criticism. Rogaly (2008) has challenged the ILO’s overemphasis on both the culpability of ‘private agents’ and the perpetrators’ engagement in exploitative practices because this focus overlooks the role and impact of broader forces such as capitalism. In like manner, Lerche (2007) also criticizes the ILO’s depoliticization of forced labor and argues that the treatment of this subject in isolation, dissociates it from the context of globalization and capitalism, which he claims are critical in creating conditions of forced labor to begin with.

### 3.2 Civil society in the sociopolitical context of Singapore

The emergence of Singapore’s civil society sector is a fairly recent phenomenon, driven mostly by the desire, of predominately middle-class Chinese Singaporeans, for expansive political liberalization (Lyons & Gomes, 2005). Although the state has, to some extent, acquiesced to these pressures, scholars have described Singapore’s civil society sector as a ‘state-sanctioned’ sphere (ibid) whose work is limited to predetermined ‘out of bounds’ (OB) markers. OB markers essentially refer to topics and areas that the Singapore government deems to be too sensitive or taboo (Lyons, 2009). Since the enactment of the Foreign Maid Scheme in the 1970s, issues pertaining to migrant workers had for many years been classified as an OB matter, which is illustrated by the 1987 incident known as the ‘Marxist Conspiracy’. The Marxist Conspiracy saw the arrest of twenty-two social workers and lay workers from the Geylang Catholic Center for Foreign Workers under the Internal Security Act (ISA). The group, which advocated for higher wages, employee benefits and fair employment conditions for migrant workers, was detained without trial, disbanded and barred from entering into ‘political’ engagements on the basis that it posed a threat to national security (Lyons, 2009). Although the state has since eased up on attempting to curb the development of the small civil society sector, the Marxist Conspiracy remains as a stark reminder that migrant worker organizations today still need to adhere to and operate within the bounds of what is allowed by the state in a non-partisan way.

Although CSOs have more space today to advance their causes, as evident by the sheer *ability* to advance the controversial claim of the existence of forced labor within the domestic labor sector (HOME & Liberty Shared, 2019), the state retains the means to put an end to any activities that threaten the ruling party's foundations (Lyons, 2009).

This research defines civil society as a type of interdependent 'third space', existing in between the 'first space' which consists of the family and the 'second space', which is occupied by the state (Van Til, 2000, cited in Yeoh & Annadurai, 2008). On their official website, RAB describes itself as an international network of researchers and experts with two primary research focuses, i.e. migrant mental health and the measurement of labor exploitation of migrants in South East Asia and this thesis therefore considers RAB to be a research-focused CSO. HOME was founded in 2004 by Bridget Lew and has faith-based roots, as Lew was a former coordinator of the Singapore Archdiocesan Commission for the Pastoral Care of Migrants and Itinerant People (ACMI). On their official website, HOME claims to be dedicated toward advocacy, empowerment and the championing for the rights of migrant workers in Singapore. The CSO has published various reports that specifically describe the primary concerns of MDWs that lead them to approach the organization in the first place. Their concerns are rooted in exploitative practices, and include, *inter alia*, salary-related claims, overwork, denial of rest days and sick leave, substandard living conditions and cases of verbal and physical abuse as well as sexual harassment (HOME & Liberty Shared, 2019). Yeoh & Annadurai (2008) differentiate between advocacy-oriented and service-oriented groups in Singapore. HOME positions itself as an advocacy-oriented organization because it attempts to work closely with government agencies, such as the Ministry of Manpower (MOM), which is responsible for the implementation and regulation of labor policies and employment conditions. However, in reality, HOME functions as a hybrid organization since it also offers various kinds of services, including legal assistance, skill-enhancing classes, and even shelter to MDWs. HOME (2019) receives approximately 15-20 MDWs seeking assistance and/or shelter on a weekly basis and in 2018 HOME provided shelter to over 800 MDWs.

In recent years, HOME has shifted from strictly operating on a local level to extending their work to a transnational level. Lyons (2007) characterizes this shift as a 'transnational mobilization' whereby both the establishment of cross-border cooperation and the development of transnational networks have become increasingly important. The way in which CSOs frame their work and the individuals that they represent allows for the exploration of the circulation of ideas across different scales and an understanding of how the movement of these ideas

manifest into practices in specific local organizational contexts (ibid). The very collaboration between HOME and the Hong Kong-based nonprofit to release the 2019 report under study can in fact be viewed as a transnational mobilization in and of itself. It is interesting to note that the government of Hong Kong, another primary destination country for MDWs, extends more generous rights and protections for the MDWs working there in comparison to the Singapore state. For instance, MDWs are included under the Employment Ordinance, which accords workers with a minimum wage limit, rest days, statutory holidays with pay, paid annual leave, sickness allowance and maternity leave (Wee & Sim, 2005, p.192). Furthermore, MDWs are allowed to mobilize and many of the CSOs and non-governmental organizations (NGOs) working with migrant labor rights issues are run by actual MDWs (ibid). The fact that CSOs in Singapore are increasingly transnationalizing their work and cooperating with similar organizations in places such as Hong Kong could prove to be worrying indicator for the Singapore state and its proven inclination to limit external influences when it comes to sensitive topics such as extended labor rights for migrant workers.

### 3.3. The Singapore government and anti-West rhetoric

Leaders of the ruling People's Action Party (PAP) have, throughout their 50+ years in power, received both domestic and international criticism for enforcing anti-democratic practices. These practices include consistently filing law suits to bankrupt opposition politicians, jailing citizens for public protests and implementing restrictions on foreign media that critically report on the country (Human Rights Watch, 2017). Although autocratic tendencies are not a new phenomenon, Chua (1996, p.viii) cautions against describing Singapore as a purely authoritarian state. Whilst the Singapore government has publicly owed its success story to 'economic pragmatism,' scholars have noted the apparent 'communitarian' ideology underpinning Singapore's growth, which privileges social cohesion and collective welfare over individual rights (Chua, 1996, p. ix). This communitarian ideology has also been referred to as 'Asian values' and is found across other countries in East and Southeast Asia. Other proclaimed Asian values include the importance of strong leadership, respect for authority and law and order (Jacobsen & Bruun, 2000, p.2). Critics of the Asian values discourse have argued that it is a *fabricated* notion that functions as a convenient tool for country leaders to dismiss individual rights that conflict with regimes' political interests, to silence internal criticism and to fan anti-Western nationalist sentiments (Xiaorong, 1998). Similarly, Bruun and Jacobsen (2000, p.14) claim that Asian leaders exploit the language of cultural relativism to justify policies that oppress people and that infringe on their individual human rights. The particular

elaboration of the Universal Declaration of Human Rights (UDHR) was a result of the establishment of the United Nations (UN) at the end of World War II (United Nations, 1948). The liberal Western discourse understands human rights as inalienable and indivisible rights that each individual is accorded with by virtue of being a human being. Since being a human being is an inalterable fact that cannot be earned nor lost (Donnelly, 2013, p.28), human rights are considered to be universal in the sense that they are held by all human beings. Other scholars such as Donnelly (2007), take a middle ground position and argue for a *relative* form of universality of human rights which leaves space for national, regional and cultural diversity. Donnelly (ibid) argues that the concept of human rights is both contingent and relative, as it is largely a function of where one has the fortune or misfortune to live, because all states have the sovereign jurisdiction to decide on whether or not to ratify the Universal Declaration and the Covenants as authoritative. Singapore's suspicion of outside influences and its dismissal of external criticism is closely linked to the city-state's Asian values rhetoric in which the government tends to adopt an anti-West position (Lyons, 2009). Therefore, the preference for communitarian values and social cohesion over the individual could be interpreted as a rejection by the PAP government of the globalization of human rights.

## 4. Theoretical Concepts

This thesis draws on inspiration from three theoretical strands, i.e. isomorphism, the continuum approach<sup>1</sup> and strategic essentialism. Within sociology, **isomorphism** is understood as processes of homogenization. DiMaggio and Powell (1983), have for example, explored the concept of institutional isomorphism and the manner in which isomorphic processes lead to increasing similarities across institutions and organizations. This research grounds its theoretical underpinnings around conceptualizations of isomorphism as articulated by Meyer (2007) and Meyer et al (1997) who claim that contemporary societies are becoming more alike due to increasing globalization and the subsequent production of waves of conformity to worldwide models. It is argued that in the aftermath of the Second World War, and the ensuing creation of intergovernmental organizations such as the UN and its accompanying agencies, the diffusion of world models has intensified. These models, which are spread through worldwide or global and associational processes, may include notions related to everything from international cooperation and the use of science to emphases on individual rights and are often connected to normative notions of the 'good society' (Meyer et al, 1997; Meyer, 2007). This

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<sup>1</sup> 'The continuum of exploitation' is used interchangeably with 'the continuum approach.'

research is particularly interested in how CSOs engage in what I refer to as *isomorphic pressures*<sup>2</sup>, when trying to propagate the world model of universal human rights regarding MDWs in Singapore. *Dominant* global world models can significantly influence national and local policies (Meyer, 2007), and there is a high degree of consensus regarding some world models, such as the one pertaining to human rights (Meyer, et al, 1997). In the case that a government rejects a world model, other non-state actors that embrace this world model, such as civil society organizations, may mobilize around it to enforce conformity. Therefore, world models not only influence countries through their main governing centers, but also by the adoption of world culture by local non-state actors (ibid). This is an important point, which will be further explored in the analysis in chapter 6.

Before addressing the second theoretical concept, the **continuum approach**, it is important to discuss the conceptualization of ‘unfree’ labor. Academic debates have often tied the concept of forced labor to ‘unfree’ labor. What does it mean to be unfree? With reference to Marx’s view on the notion of free and unfree labor, Strauss (2012) describes how workers are never truly free under capitalist economies because they do not have access to the means of production or subsistence. In fact, the last two centuries have seen a sedimentation of nation-states’ constriction of the movement and freedoms of workers through laws, regulations and policies (McGrath & Strauss, 2015). This understanding of free and unfree labor has been criticized by feminists’ scholars who argue that some groups, i.e. women, migrants and ethnic minorities, face additional challenges when commodifying their labor (Strauss, 2012). Hence, while all workers are subject to degrees of unfreedom, the vulnerabilities of certain groups and individuals result in them being more gravely affected by unfreedom. The domestic labor sector occupied by migrants in Singapore is a particularly complex site of unfreedom. Indeed, Huang & Yeoh (1996, p. 488). describe the space that a MDW occupies as an “(...) *untenable space* [emphasis added], *neither incorporated as an employee in the public sphere with social and legal rights under the jurisdiction of the state, nor a member of the familial where relations are governed by non-market affinities.*” Recent scholarly literature (Skrivankova 2010; Strauss, 2012; Strauss & McGrath, 2016) has pointed to the importance of considering ‘the continuum of exploitation’ when addressing the subject of forced labor. Previous conceptions of forced labor have involved a binary thinking wherein victims have been viewed as either ‘forced’ or ‘not forced’. This line of thinking has also tended to exclude

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<sup>2</sup> The term ‘isomorphic pressures’ has been used in various academic fields. Here, it is used to describe how CSOs attempt to bring about isomorphic change by pressuring the state. This use of the term draws inspiration from studies of social movements by, for example, Poulson, Caswell & Gray (2014).

certain individuals that are not deemed 'forced enough' (Skrivankova, 2010). A continuum approach views forced labor as a spectrum and as a continuum of experiences and situations. Rather than a static phenomenon, forced labor is understood as a relational notion and it further acknowledges the role of external and individual circumstances that could be tied to the manifestation of forced labor such as legal frameworks, labor market functions, migration status and so on (ibid).

The final theoretical concept relevant to this research is **strategic essentialism**. First coined by Spivak in the 1980s, strategic essentialism refers to the tactic that *subaltern* or 'Other' groups adopt when they deliberately mobilize around essentialized ideas regarding the notion of a shared cultural identity in order to get a political message across (Wolff, 2007, p.4789). The Subaltern refers to subordinated groups that are not part of the dominant elite groups such as minority ethnic groups. For instance, an essentialist statement could be that, "all migrant workers are oppressed." Similar to framing processes, the adoption of strategic essentialism simplifies social reality while attempting to bring forward a uniform group identity in order to achieve predetermined goals. Activists, social movements and NGOs have tended to utilize strategic essentialism as a tool, something that critics such as Kruper (2003, cited in Robins, 2008) have problematized and challenged. Using the case of South Africa, Kruper argues that there is often a disconnect between the essentialist identity discourses that these actors tend to promote and everyday lived realities, which he claims can have dangerous political consequences. Although a valid point, due to the sociopolitical context in Singapore, MDWs are forbidden from mobilizing and have to rely on CSOs such as HOME and TWC2, organizations that are mostly made up of middle-class Singaporean nationals, who *are* able to bring forward the concerns of MDWs relating to rights and wellbeing. That is why the analysis below will center on Robin's (2008) understanding of how activists and NGOs engage with what he refers to as a 'benign' form of strategic essentialism when representing their clients. Whilst essentialist strategies are still employed, they are arguably carried out in a relatively harmless way and within the bounds of what is allowed by the state.

The concept of isomorphism is used throughout the analysis, while the continuum approach and strategic essentialism are applied specifically to the second part of the analysis concerning the two reports' framing of MDWs as forced workers. I hold that the theories complement one another because they pertain to different elements relevant to this research concerning the ways in which CSOs operate. In other words, while CSOs may subscribe to the theoretical aspects of

isomorphic ideas, the concept of strategic essentialism as a tactic, in turn concretizes the practices that they ultimately engage in.

## 5. Methodology

### 5.1 Research design

This thesis is carried out as a comparative case study of the two reports published by RAB and HOME & Liberty Shared. Although, the reports constitute the primary foundation for the analysis, additional secondary material is used including published books, academic articles and ILO publications. A hermeneutic approach is applied throughout the research process, meaning that I have attempted to bring forward the specific sociopolitical context within which the reports have been produced (Bryman, 2015, p.560). In line with this, it is important to emphasize that the synthesis and analysis of the secondary material presented in this study is based on my particular interpretation of the material. This can potentially pose interpretational difficulties (Punch, 2005, p. 103). In addition, since one of the study's aims is to analyze the selected cases in an in-depth manner, the descriptive study has also followed an ideographic approach (Bryman, 2015, p.69).

The reports by RAB and the HOME & Liberty Shared coalition have been selected due to the new and ostensible claims they make regarding the nature of the domestic labor sector in Singapore, and the manner in which they frame female migrants employed in the domestic labor sector as forced workers. In order to critically analyze the RAB and HOME & Liberty Shared reports, I have chosen to draw inspiration from Bacchi's WPR approach and combine it with Benford and Snow's conceptualization of frame analysis, which will be expanded upon further below. Bacchi (2009, p.xii) emphasizes that although problematizations involve framing processes and thereby inevitably simplify reality in order to present a problem in a particular manner, the WPR approach as presented by her is distinctly *not* intentional framing. I maintain that the way in which I utilize the two approaches is motivated precisely *because* of the framing roots or origins inherent within the WPR approach. In addition, since the identification of problem representations constitutes only one aspect of the entire study, I am not applying the whole WPR framework, but merely drawing inspiration from the first two out of the six questions presented in the framework. Nonetheless, since the study still utilizes part of the WPR framework, it is influenced by one of the intellectual traditions that the framework draws upon,

namely poststructuralism. Hence, in order to understand the HOME & Liberty Shared and RAB reports, it is important to study both the reports and the system of ‘knowledge’ that produced the reports (Bacchi, 2009, p.36).

## 5.2 The WPR Approach

What’s the problem represented to be (WRP) as presented by Bacchi is a method used in policy analysis that studies ‘problematizations’ or ‘problem representations’. Rather than reacting to problems as if they are situated *outside* of policy processes, the WPR approach acknowledges that actors involved in policy-setting are *active* in the creation of policy problems (Bacchi, 2009, p.1). As aforementioned, it is not the intent of this thesis to apply the WPR framework in its entirety, for that reason only Bacchi’s Q1 and Q2 are answered. The first question, ‘What’s the ‘problem’ represented to be in a specific policy?’ is quite straightforward. Since the premise within a WPR approach is that all policy proposals and formulations contain ‘implicit’ references to what the actual ‘problem’ is, Q1 seeks to makes these problems ‘explicit’. Question 2 seeks to analyze the ‘conceptual logic’ within a particular problem representation. By conceptual logic, Bacchi (2009, p.5) refers to certain assumptions, presuppositions, values and signs that create meaning in order for a problem representation to be coherent. The full WPR framework is constituted by the following 6 questions:

**Q1. What’s the ‘problem’ represented to be in a specific policy?**

**Q2. What presuppositions or assumptions underlie this representation of the ‘problem’?**

Q3. How has this representation of the ‘problem’ come about?

Q4. What is left unproblematic in this problem representation? Where are the silences? Can the ‘problem’ be thought about differently?

Q5. What effects are produced by this representation of the ‘problem’?

Q6. How/where has this representation of the ‘problem’ been produced, disseminated and defended? How can it be questioned, disrupted and replaced?

(Bacchi, 2009, p.48)

### 5.3 Frame analysis

This study utilizes sociological understandings of framing processes through the method of frame analysis. The concept of ‘frames’ or ‘framing’ derives from the work of Goffman (1974, cited in Benford & Snow, 2000, p.614) who defines frames as “(...) *schemata of interpretation that enable individuals to locate, perceive, identify and label occurrences within their life space and the world at large*”. In other words, framing can be understood as the selection and interpretation of specific aspects of a perceived reality that are made *salient* in order to present or *frame* a particular perspective on a given issue in a certain manner (Entman, 1993; Hardin & Whiteside, 2010, p.313). It is thus through frames that meaning is constructed and imbued into occurrences and events, which in turn both organize experiences and guide practices. Since this research centers on the role of CSOs in Singapore, the study will utilize Benford and Snow’s (2000) conceptualization of framing processes which is specifically related to social movements. As ‘interpretive agents,’ activists within social movements often make use of framing when interpreting and challenging social reality and in turn, publicly communicating their demands for change (Snow & Soule, 2010, p.50-51, cited in Lindio-McGovern, 2012). Framing processes are understood as a procedural phenomenon that involve both agency and contestation with different frames competing for the right to interpret and define social problems (Benford & Snow, 2000). According to Benford and Snow (2000) frames are partly developed through three core framing tasks, i.e. diagnostic framing, prognostic framing and motivational framing. In the analysis below, I will utilize this framework in combination with Bacchi’s Q1 and Q2 in order to identify how the two reports by RAB and HOME & Liberty Shared understand problems and identify the actors responsible (diagnosis), the specific interventions suggested to solve the problem (prognosis), and finally, how these interventions are rationalized and legitimized (motivational).

## 6. Analysis

The analysis is divided into two main parts. The first part will answer the first research question of the thesis, which pertains to problem representations. This part draws inspiration from Bacchi's WPR framework in order to identify, on the one hand, what the general 'problem' is represented to be in a specific policy (Q1), and on the other hand, the presuppositions or assumptions underlying this representation of the 'problem' (Q2). Since I am combining frame analysis with inspiration from the WPR approach, I will be applying Benford and Snow's (2000) core framing tasks framework throughout this part of the analysis as well. The second part of the analysis seeks to answer the second research question, which relates more specifically to the intentional framing of MDWs as forced workers in the reports. Here, the different methodologies behind the reports' framing of MDWs as victims of forced labor are described, contrasted and analyzed in connection to the theoretical concepts outlined in chapter 3. This study's third research question is not limited to any one section of the analysis and will be answered throughout the chapter.

### 6.1 A labor rights issue

Whilst HOME & Liberty Shared (2019, p.55) make various policy recommendations, the primary policy recommendation they propose to the state is to extend the Employment Act (EA) to MDWs. The EA is Singapore's main labor law that provides all employees with fundamental terms and working conditions, including limits on working hours and overtime, rest days, sick leave and annual leave. MDWs are the only migrant group that are not covered by the EA (Ministry of Manpower, 2018b) they are instead covered by the Employment of Foreign Manpower Act (EFMA). However, HOME & Liberty Shared (2019) as well as an external Human Rights Watch (2005) report, both argue that the EFMA does not provide adequate legal protection to MDWs nor sufficient regulation of work conditions. For instance, the EFMA utilizes ambiguous language and does not specify a legal limit on working hours, resulting in a large number of MDWs working excessive hours, which HOME & Liberty Shared (2019) argue to be a manifestation of forced labor. From this proposed policy, the primary 'problem' is constituted to be, and represented as, a 'labor rights problem' because MDWs are viewed as excluded from access to basic labor standards as stipulated in the EA. From the identified problem representation, two core framing tasks in Benford and Snow's (2000) framework can in turn be applied here, i.e. diagnostic framing and prognostic framing. Since the problem is understood and presented as a labor rights issue, the diagnostic framing in the report attributes

the blame to the state and the MOM, because these actors are ultimately responsible for including or excluding certain groups in society in national laws and acts. The prognostic framing in the report that relates to the suggested solutions to solve the problem, is simply the inclusion of MDWs in the EA.

However, the state does not appear to agree with the proposition presented in the HOME & Liberty Shared report concerning the demand to further extend labor rights to MDWs. Instead, the state repeatedly refers to the EFMA and contends that this act provides sufficient conditions and protections for MDWs (Ng, 2017a). In response to claims that the government is not adequately regulating the domestic labor sector, the Singapore government insists that the problem with enforcing further regulation lies in the “nature” of the work that MDWs engage in (Yeoh, Huang & Devasahayam, 2004). Since the private sphere of the employer’s household functions as both a home and a workplace, state officials argue that it is impossible to regulate working hours and that the wages and work conditions of MDWs are better left to the free market (Yeoh, Huang & Gonzales, 1999). State officials further argue that it is difficult to differentiate between household chores performed for the employer and the MDW’s personal chores (Huang & Yeoh, 1996).

Now that the implied problem in the HOME & Liberty Shared report has been identified as a ‘labor rights problem’ and the Singapore government’s rationalization for the exclusion of MDWs from the EA has been presented, I proceed to further link the problem representation to conceptions about the public/private dichotomy and the way in which domestic work is viewed and valorized in society. In line with this connection, the report emphasizes that, “*The exploitative yet normalized practices (...) in Singapore must be (...) benchmarked against employment standards all workers deserve. Domestic work is [emphasis added] work.*” (HOME & Liberty Shared, 2019, p.55). The entrenched conception that household work, whether paid or unpaid, is perceived as ‘non-work’ plays a critical role in the exclusion of MDWs from the EA. The private space where reproductive care work and domestic work is carried out, largely by either female domestic workers or female family members, is considered secondary to the public space which is characterized by productive work (Yeoh, & Huang, 1996). Low-skilled and low-waged construction workers from Bangladesh, India and China are often considered the male equivalent to MDWs because they carry out so-called 3D jobs (dirty, dangerous and demeaning). Migrant construction workers’ inclusion in the EA is a prime illustration of how certain workers are valorized over others in what Sassen (cited in Zimmerman, Litt & Bose, 2006, p.26) terms ‘the new global economy’. The private sphere of the home where MDWs

work is not only inherently gendered, but also hierarchized in relation to work conducted in the public sphere. In this way, the state is able to justify the circumscription of extensive rights and regulations as far as MDWs are concerned.

## 6.2 A governance issue

Contrary to HOME & Liberty Shared, RAB does not propose the inclusion of MDWs in the EA at all. Instead, their two primary recommendations to the state include 1) a live-out option and 2) the abolishment of the security bond (RAB, 2017). Currently, MDWs in Singapore are obliged to live with their employers, who are responsible for providing any employed MDW with all basic necessities. Moreover, the employers are required to pay a SGD\$5000 (US\$3670, 66) fee to the state in order to ensure that MDWs are supervised and controlled so that they do not engage in any “illegal, immoral or undesirable conduct or activity” (Employment of Foreign Manpower Act, 2012). The security bond ensures that there are adequate funds in the case that a MDW is repatriated should she break any of the terms and conditions of the work permit. With the risk of having to forfeit the security bond, many employers implement stringent rules such as confiscating MDW’s communication devices, denying rest days and attempting to keep MDWs indoors as much as possible by overworking them or enforcing strict curfews (HOME, 2019; Rahman, Yeoh & Huang, 2005, p.238). RAB (2017) claims that a live-out option would not only potentially reduce MDWs dependencies on their employers, but also remove the expectation that MDWs should be available around the clock, which in turn would reduce excessive working hours, a factor that RAB also identifies as a key indicator of forced labor. From the two proposals described above, the primary ‘problem’ is presented as a governance issue, whereby stringent policies are considered to be the primary factor behind the creation of enabling conditions for both exploitation and the manifestations of forced labor. Whilst the problem is represented as a governance issue, the diagnostic framing of the report does not place the entire blame on the state. Rather, the identified problematization also recognizes the role that employers play when engaging in exploitative practices, which in turn creates an enabling environment for what RAB considers to be forced labor. RAB (2017) argues that the practical abolishment of the live-in requirement and the security bond would ameliorate many of the issues that MDWs in Singapore face. In contrast to HOME & Liberty Shared, the solutions conveyed in the prognostic framing of the RAB report do not point to ‘radical’ structural changes like the extension of rights; rather it is presumed that more modest policy changes would solve the problem.

The two policy suggestions presented by RAB point to the global trend of deregulation and informalization of waged care and domestic work as previously described in chapter 2 (Sassen, (2006, p.32). Because of the ‘hands-off’ position that the Singapore government assumes, whereby employers are not even required to provide MDWs with employment contracts (Yea, 2015), the extension of fair work conditions is ultimately left entirely up to the whims of the individual employer (Huang & Yeoh, 1996). In addition to transferring much of the responsibility for regulating the domestic labor sector to the private employer by issuing a live-in requirement, I argue that the imposition of high fees, as expressed in the security bond, further induces the employer to engage in self-regulation. This practice of self-regulation is not only restricted to the self, but also extends to how the employer ‘manages’ their employed MDW and is ultimately an effective means for state control. Therefore, whilst the state does not explicitly recommend employers to, for example, take away a MDW’s communication devices, the security bond in place compels employers to implement these strict and often exploitative rules and conditions anyway.

### 6.3 A breach of fundamental human rights

As identified above, HOME and Liberty Shared’s call to include MDWs in the EA is justified and guided by the problem representation that views MDWs’ issues as a labor rights issue. There are various assumptions and values embedded in this representation of the problem, which can be discerned in the following concluding statement in the report, “*Decent work and its entitlements need to be less of a gamble: core labor rights should be clearly specified, benchmarked to **international standards** [emphasis added], and enshrined in national laws,*” (HOME & Liberty Shared, p.54). A core assumption is the belief that labor rights are human rights and that these rights are universal and ought to be extended to migrant workers on a global scale, including to MDWs in Singapore. The rationale or ideology behind HOME and Liberty Shared’s motivational framing is based on this fundamental core assumption. A human rights discourse is evident throughout the HOME & Liberty Shared report as it calls for all “(...) *states to commit to the full implementation of **ILO standards** [emphasis added] in relation to labor protections and rights for all workers, including migrant workers.* (HOME & Liberty Shared, p.19). This statement, which rests on claims for normative isomorphic ideas, seems to disregard the relativist position that scholars such as Donnelly (2007) assume with regard to human rights, and views the spread and implementation of universally defined human rights as a uniform process. Human rights are presumed to be applicable everywhere around the world, in accordance with international standards, and not just reserved to certain geographical regions

such as the Western world (Meyer et al, 1997). Several parts in the RAB report can also be interpreted as subscribing to isomorphic ideas. For instance, RAB (2017, p.114) emphasizes that the working conditions of migrants are no longer an ‘isolated issue’ between sending and receiving countries but rapidly becoming a global issue with ethical implications. Furthermore, although RABs main problem representation relates to governance rather than labor rights, the RAB (2017, p.114) report does make the occasional reference to the increasing global association of migrant workers’ issues with human rights matters. Hence, it could be argued that both reports legitimize their claims through appeals to isomorphic world models. Yet, the isomorphic pressures that the CSOs engage in, with reference to world models propagated by ILO, could be viewed as the kind of ‘foreign influence’ which the Singapore PAP government has sought to isolate its budding civil society sector from. I argue that there are strong tensions between the isomorphic presuppositions identified in the reports by HOME & Liberty Shared and RAB, and the anti-West position (Lyons, 2009) that the Singapore government so often adopts in its Asian values rhetoric. One of the main tensions is found in the emphasis that the CSOs place on *individual* universal human rights in contrast to the anti-West discourse of the Singapore state that favors the good of the collective over the individual. The seemingly clashing worldviews of the CSOs and the Singapore state may in turn create various hurdles for the achievements of the organizations’ long-term goals. The points of contention concerning the *framing* of MDWs as ‘forced workers’ by the CSOs in the reports is one such subject that will be explored in detail below.

## 6.4 Framing MDWs as victims of forced labor

### 6.4.1 The RAB Report

The 2017 RAB report by Wessels et al, adopts a mixed- method approach with the aim to quantify and measure levels of labor exploitation within Singapore’s domestic labor sector, whilst also capturing a qualitative understanding of the experiences and underlying psychological mechanisms that MDWs face. From interviews and focus group discussions with a total of 735 MDWs and 80 employers, the report’s findings identify a majority (60%) of the surveyed MDWs as exploited, 23% as victims of forced labor and 10% as trafficked. The report utilizes the ILO (2009b) framework of ‘Operational Indicators of Trafficking in Human Beings’ that contains six dimensions with an overall 67 indicators that are defined as strong, medium or weak. In order to measure degrees of exploitation, the interviews focus on the concrete practices that relate to three specific dimensions, i.e. 1) exploitation, 2) coercion at destination and 3) abuse of vulnerability at destination. Thus, participants were identified as

*exploited*, if they identified positive with at least 1 strong indicator (i.e. excessive working days or hours) and 1-3 medium indicators (e.g. bad living conditions, low or no salary or hazardous work) (RAB, 2017). In like manner, the aforementioned dimensions and the supporting operational indicators were applied to interview data in order to quantify exploitation and categorize participants into certain groups, i.e. not exploited, exploited, forced and trafficked.

## 6.4.2 The HOME & Liberty Shared Report

The objective of the report by HOME & Liberty Shared (2019) is to identify situations of forced labor in order to improve the understanding of the concept of forced labor. The long-term aim of the report is to inform policy-makers of how forced labor operates, in order to accomplish change within the domestic labor sector. In contrast to the RAB report, the report by HOME & Liberty Shared utilizes a newer ILO framework developed by the SAP-FL in 2012 that identifies 11 indicators of forced labor (ILO, 2012b). The report applies this framework of indicators onto HOMEs casework data between the period April 2017 - March 2018 when they received a total of 872 recorded cases. Unlike the RAB report, the HOME & Liberty Shared report does not seek to produce a concrete number of how many of the MDWs might be ‘forced’, instead the objective is to understand how forced labor situations are manifested. This is done by selecting 11 case studies and analyzing them in detail by applying SAP-FLs 11 indicators. The SAP-FLs 11 indicators used in the case studies include:

- Abuse of vulnerability
- Deception
- Restriction of movement
- Isolation
- Physical and sexual violence
- Intimidation and threats
- Retention of identity documents
- Withholding of wages
- Debt bondage
- Abusive working conditions
- Excessive overtime

### 6.4.3 Discrepancies in framing processes and intra-actor tensions

The reports in question have not gone unnoticed nor unanswered by the Singapore state. With regard to the HOME & Liberty Shared report, a spokesperson for the MOM responded with the statement that, “*Meeting one or more of the ILO forced labor indicators may not necessarily mean that a worker is indeed in a forced labor situation.*” (Seow, 2019). While there is some truth to this statement, the *concentration* of several ILO indicators might suggest practices and situations of forced labor (Skrivankova, 2010). Nonetheless, it could be argued that the HOME & Liberty Shared report applies the indicators in a rather arbitrary manner. The authors do not specify the number of indicators that must be present in order to classify a situation as forced labor. Some indicators, such as the ‘retention of identity documents,’ are straightforward, while others are more ambiguous. For instance, what exactly constitutes ‘restriction of movement’? Although many employers set a curfew for MDWs (HOME & Liberty Shared, 2019), the question is whether such practices necessarily equate to manifestations of forced labor. The difficulty in measuring and quantifying forced labor is a fact that even the authors behind the HOME & Liberty Shared (2019, p.24) report acknowledge as a potential limitation. The MOM has directed similar criticism toward the RAB report and emphasized the ‘oversimplified’ interpretation of labor exploitation that the report follows, which the MOM claims, paints a misleading picture of MDWs in Singapore (Ng, 2017a). According to Weitzer (2007, cited in Yea, 2015) the indicators presented in the ILO frameworks that the CSOs use “(...) *work by reducing complex social realities and individual experiences to generalizable quantifiable expressions.*” In this sense, ILO typologies inevitably and invariably simplify both experiences and the world at large. However, the subject of forced labor is a highly complex matter, which I maintain can only be adequately understood and addressed by preserving the complexities inherent in social reality, not by reducing them. This complexity is further illustrated in an article by Singapore’s leading newspaper, *The Straits Times*, wherein the authors behind the RAB and HOME & Liberty Shared reports retrospectively disagree with the manner in which the other organization has understood and presented forced labor. For instance, RAB considers a MDW ‘coerced’ if she does not receive a 24-hour day off or the keys to her employer’s home, which a spokesperson for HOME completely rejects (Ng, 2017b). Hence, there is an obvious lack of consensus, not only between the CSOs and the state, but also *among* the CSOs about a fundamental aspect, i.e. the identification of forced labor victims. An additional issue related to the disaccord between these three actors, is the apparent subjective *interpretation* by the individuals in charge of identifying forced labor victims in the respective reports. Not only do the reports tend to treat each forced labor indicator in isolation, it is also arguably difficult to

fit complex cases into a simple yes/no category (Skrivankova, 2010). I hold that the incorporation of a continuum approach could aid in avoiding several of the shortcomings discerned in the reports. First of all, a continuum approach could potentially be utilized to destabilize the dichotomous understanding of forced labor as either ‘free’ or ‘unfree’ by recognizing that all labor relations contain various degrees of unfreedom (Strauss, 2012), by identifying degrees of unfreedom and by highlighting the *fluidity* between labor relations (Lerche, 2007). Secondly, the interpretation of forced labor as a continuum of exploitation, rather than a static phenomenon, could allow for a more holistic understanding of the contextual dimensions behind exploitative practices and how they are interlinked and reinforced, which in turn perhaps could ameliorate some of the simplifications apparent in the reports.

A recurring pattern in both reports is the continuous reference to MDWs as one singular body or entity. For instance, HOME & Liberty Shared (2019, p.8) write that “*As a community, domestic workers are highly susceptible to forced labor.*” Although the women in question are in the same line of work, the individuals that work as domestic workers in Singapore have diverse backgrounds as far as nationality, ethnicity and religion. For instance, a study by Yeoh & Huang (1998) saw a difference in nationality in the number of rest days that Filipino, Sri Lankan and Indonesian MDWs received. MDWs thus have distinctly different experiences that are influenced by the intersection of ethnicity, nationality and intersects (Strauss, 2012). The repeated reference to MDWs as one homogenous group could be an unintentional concealment on the part of the CSOs, of the intra-community differences that exist among MDWs. Another way of interpreting this framing of MDWs as a ‘community’ is to view it as a *deliberate* tactic in line with a strategic essentialist approach. The categorization of individuals through essentializing strategies can be found in the RAB report as well. The most evident example is the extrapolation of the RAB findings to the total MDW population (250,000). From interviews with 735 MDWs, wherein the report identifies 60% as exploited and 23% as victims of forced labor, the authors behind the report estimate that 145,000 workers ‘might’ be exploited and that 55,000 ‘could’ be victims of forced labor (RAB, 2017, p.80). It would appear that the CSOs could potentially be using benign essentialist strategies, which, like framing processes, serve to simplify social reality to further these organizations’ goals of changing the current situation of many MDWs in Singapore for the better. However, there are various implications with attempting to quantify who is ‘unfree’ or ‘forced’ in relation to who is considered ‘free’ or ‘not forced’ in the manner that the RAB report does. First of all, the report risks reproducing discourses of victimization. Although it is true that the bargaining powers of MDWs are often limited (Huang & Yeoh, 1996; HOME & Liberty Shared, 2019), one of the main critiques

toward trafficking and forced labor publications is the often-accompanying victimization discourses that portray migrant workers as individuals lacking and/or without agency (Skrivankova, 2010; Strauss, 2012; Rogaly 2008). Secondly, various scholars have argued that human trafficking and forced labor frameworks might produce the opposite intended effect and serve to stabilize rather than challenge exploitative migration regimes (McGrath & Strauss, 2016; Yea, 2015), by buying into notions of ‘deserving’ and ‘underserving’ victims (Skrivankova, 2010). It is beyond the scope of this research to delve into these limitations and the consequences of framing MDWs as forced workers in more detail. However, readers should be aware of some of the existing critical voices within academia toward the ILO typologies and publications.

## 7. Conclusion

This research initially set out to critically explore and compare the two reports by HOME & Liberty Shared and RAB by identifying the general problem representations within them as well as examining specific framing processes. The stance and perspective of the Singapore state are consistently contrasted to that of the CSOs throughout the study, which allows for the scrutiny of core tensions between these actors. Although both reports articulate the same fundamental claim, i.e. that the domestic labor sector in Singapore is a site of forced labor, they differ in other fundamental ways, including in their problem representations. The primary problem representation in the HOME & Liberty Shared report is identified as a labor rights issue wherein the exclusion of MDWs from the EA is viewed as an infringement of their individual and universal human rights. In contrast, it is established that the state does not view the problem as a lack of rights and is able to refer to dichotomous conceptions of the public/private sphere to justify its asserted ‘inability’ to extend further rights to MDWs. As opposed to HOME & Liberty Shared, the main problem representation in the RAB report is distinguished as a governance issue, wherein practical policies are assumed to be the main contributing factor behind the enablement of exploitative practices. Therefore, in addition to the differences in the proposed interventions, I identify a marked difference in how the two CSOs understand and conceptualize the underlying problems facing MDWs in Singapore to be.

There are various components behind the CSO’s framing of MDWs as forced workers. I argue that the CSO’s utilization of, and appeal to, ILO frameworks which inherently carry within them world models such as universal human rights, is an attempt on the part of the CSOs to

push the state into conforming to isomorphic pressures. However, there is a documented resistance within the Singapore state to acquiesce to isomorphic pressures, which is clear in its tendency to adopt an anti-West position with reference to unique and culture-specific values. Consequently, fundamental tensions are created between the clashing worldviews of the CSOs and the state. Although the spread of world models is inexorable due to the globalized world we live in today, these tensions illustrate the complexity and the struggle in actually implementing these isomorphic models in context-specific settings such as in the city-state of Singapore. One problem with the CSO's combination of both the ILO frameworks and essentialist strategies is that they invariably reduce social reality, which the state is then able to exploit. Although the state does not subscribe to a continuum approach, it could be seen to be taking advantage of the lack of complexity within the reports, and is further able to reject isomorphic pressures concerning extended rights for MDWs and convincingly argue for the maintenance and reproduction of the current structures in place today.

Due to the sociopolitical context of Singapore, where the work of CSOs is not fully recognized as authoritative, their utilization of tools such as strategic essentialism is important in attempting to bring about the isomorphic world models that these organizations subscribe to. However, it would seem that the Singapore government is exploiting the weaknesses inherent in both framing processes and essentialist strategies in order to question the validity of forced labor claims and in turn, delegitimize the CSO's attempts to advance their claims, even when many of the claims are well-founded. Whilst victim identification is crucial, there needs to be a recognition of the inherent complexity of forced labor and the many pitfalls that CSOs and other non-state actors risk falling into when navigating this fraught terrain.

## 7.1 Reflections and future directions

Possible future studies would find value in further exploring the implications of framing MDWs as forced workers, particularly in terms of the exclusionary effects that narrow definitions tend to produce. Although this study has emphasized the current lack of consensus regarding the subject of forced labor and the difficulty in measuring and quantifying forced labor practices and situations through a case study centering on Singapore, the aim of this study has not been to determine whether or not MDWs in Singapore are actually victims of forced labor. Rather, in the grand scheme of things, this study serves as a humble contribution to the understanding of larger-scale phenomena occurring in the world today. Although the spread of world models has always transpired, forces of globalization have in many ways intensified isomorphic

processes. This study cautions against the taken for granted assumption that world models can always be implemented easily and unerringly without consideration to context-specific settings. Instead, it is important to understand the complexities inherent in isomorphic world models in terms of shifting trends, growing or diminishing resistance and potential clashes among different worldviews on a global scale. For instance, in a European context, the changing structures within the European Union exemplifies this. Hence, the acceptance or rejection of world models should be viewed in much the same way as the subject of forced labor, as a dynamic and ever-changing phenomenon, rather than a static event.

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