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Merchants of Migrant Domestic Labour

Recruitment Agencies and Neoliberal Migration Governance in Southeast Asia

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Liberty L. Chee

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Liberty L. Chee
Philosophy and Cultural Heritage
Ca' Foscari University of Venice
Venice, Italy

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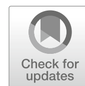
Chapter 1
Introduction: Trade in Workers Who Make All Other Work Possible



> Only females are convertible into domestic workers, even though they may be college graduates … Here, our young women who are educated cannot find jobs. So their advantage in terms of overseas migration is they can easily morph – if you are an HRM[1] or IT graduate, or even a nurse, you can just accept a job as a domestic. You can go. Male graduates cannot do the same.
>
> —Orlando Ongpin,[2] Manila recruiter

Seated in his Jakarta offices, Raditya Surono complained about how government and civil society organizations expected the impossible from his recruitment company. "If the employers don't pay the salary – they say it's the agency's fault. The employer is never at fault. If the employer hits the maid, it's our fault. They blame us for sending the worker to someone who will do something like this, like we know everything, like [we are] God. And when the worker kills the employer, we are also to blame." Being "like God" in Surono's reasoning meant being held accountable for all manner of highly contingent outcomes—from non-payment of salaries to egregious human rights violations. He claimed other migration stakeholders did not seem to understand that doing business meant that gains came with taking risks. "But the government, and also some NGOs, they want the high gain without the risk." Surono was especially bitter about his government's unilateral declaration of domestic worker deployment moratoriums, and when the Indonesian government's specialised agency, the BNP2TKI,[3] ate into his market share. "The government is using our tax payment to take our market." Surono then complained about the constantly changing, sometimes arbitrary rules that make it difficult to operate. "They force us to do wrong. To break the rules."

This book is about the "business" of moving a valuable category of worker across borders. The "demand" for such workers in Southeast Asia means that of the nearly 5 million domestic workers in the region, one-quarter are international migrants (ILO, 2021, p. 31). Private recruitment agencies, such as the one run by Surono, play a crucial role in facilitating the sourcing, training and management of these

[1] Hotel and restaurant management.

[2] Not his real name. All names henceforth are pseudonyms.

[3] *Badan Nasional Penempatan dan Perlindungan Tenaga Kerja Indonesia* (National Agency for the Placement and Protection of Indonesian Migrant Workers). In 2017, this institution has been rebranded as *Badan Pelindungan Pekerja Migran Indonesia* or Indonesian Migrant Worker Protection Agency.

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temporary migrants between sending countries and labour markets elsewhere. The question is, why do these market actors play such a prominent role in this kind of migrant labour? And what kinds of relationships do they form with various other actors? The book focuses on agencies that operate in the Philippines, Indonesia, Singapore and Malaysia, the major sending and receiving countries in the region respectively. Both the Philippines and Indonesia also send workers to other regions—notably the oil-exporting countries in the Gulf (e.g. Saudi Arabia, Kuwait, Qatar, etc.). Singapore and Malaysia receive workers from both within the region (e.g. Myanmar, Cambodia) and from South Asia (e.g. India, Nepal).

In Asia's temporary migration regimes, domestic workers require the services offered by recruiters in their own country and employment or placement agents in the destination country. This "dyad" is the main architecture for this type of worker mobility in major migration corridors not only in Southeast Asia, but in South Asia, the Middle East and in new "exporting countries" in Africa. As part of the broader migration industry (Betts, 2013) or migration infrastructures (Xiang & Lindquist, 2014), they may have affiliations with or be direct subsidiaries of companies that provide loans to prospective migrants or perform services such as medical examination. They facilitate migrants' return when applicable. In other words, these non-state actors are indispensable in the governance of this type of labour mobility. I draw from James Rosenau's definition of "governance" as activities driven by shared goals that are not necessarily circumscribed by the legal and police powers of the state. It is a system of rule that is widely accepted as legitimate even without legitimation by formal institutions (Rosenau, 1992, p. 4).

Private recruitment and employment agencies (PREAs) are such important actors in the migration governance of this sector, in part due to the specificity of domestic work. This category of worker is not normally included in employment laws, and is excluded from many labour regulations. Their place of work is usually their employers' household, making it difficult to guarantee that their terms of employment are being followed. Temporary migrant status also brings other challenges. When a worker's residence is tied to their employer, the threat of deportation may be used as leverage in an already difficult living and employment situation. Often, domestic workers have no path to citizenship. Their right of work and residency must be continuously renewed until they hit the maximum age limit, after which they must be repatriated.[4] In all of these processes, PREAs play various roles. Unlike other state apparatuses or non-governmental organisations, these are business entities motivated by market shares, growth and a return on investment.

While there is evidence that all kinds of human mobilities now take on a "growing logic of commodification and exchange (Betts, 2013, p. 58)," this "logic" is under-examined, especially in domestic worker migration. At its core, this book

[4] In Malaysia, the minimum age is 21 and the maximum is 45. In Singapore, the worker should be between 23 and 50 years old upon application for a work permit. Those aged 50 and above may renew their permit until 60 years old.

seeks to understand the activities performed by PREAs, and to unpack their relationships with other stakeholders—i.e. government bureaucracies, employers, and domestic workers themselves. I argue that these relations comprise neoliberal migration governance—a governmental rationality that cedes authority to the market. As economic actors, PREAs derive authority from their market expertise—specifically their purported ability to reduce transaction costs and perform regulatory tasks more efficiently (Buthe & Mattli, 2011; Cutler et al., 1999). They wield market authority given their capacity to set standards, and the normative acceptance of market-based decision-making (Hall & Biersteker, 2004).

I unpack the "market authority" and "market-based decision-making" of these agencies in Southeast Asia by conceptualising the market as not only concrete social relations but as relations of power. I draw from Karen Shire's conception of market actors as social rather than economistic entities (Shire, 2020). Markets are created by people in specific socio-cultural contexts rather than spontaneously self-organizing entities that respond to price signals in abstract economic theory. Various actors may have antagonistic interests. There may be significant power asymmetries that make it difficult to be self-correcting rational agents. In other words, markets are full of people who behave in ways that exceed market rationality. They are not means-ends calculating machines. And when there is ambiguity as to whether what is being exchanged are household and care services or domestic workers *themselves*, it is difficult to make claims about what, exactly, is being subjected to competition—the core ordering mechanism of market governance (Jessop, 2015).

This book demonstrates the explicitly political nature of governance, not simply as a matter of administration or "steering", but as a process rife with contestation, power and ideology (Davies, 2011; Overbeek, 2004). Centring power as social relations opens up new avenues of inquiry about the nature of global governance as "infrastructure built on liberal principles (Coen & Pegram, 2015, p. 417)." This may be the case for issues covered by international law or the European Union's dense institutional networks, but says very little about illiberal, "uncivil" spaces. That is, this assumption does not take into account non-state actors who are not rule-bound, those who do not subscribe to principles of formal equality, and indeed democracy (Hansson & Weiss, 2023). Apart from the delicate issue of the exchange of labouring bodies across sovereign jurisdictions, the nature of domestic work poses the double challenge of being invisible to the law *and* the economy. It is not recognized as "real" work and is usually excluded from the national accounts and labour laws in many jurisdictions worldwide. Where such regulations exist, it is difficult to monitor whether they are being observed given that the place of employment is the private household. The double invisibility has shaped the character of the ordering mechanisms of this specific kind of mobility, one that has ostensibly relied on the institutions and practices of the market in Southeast Asia and beyond.

Theoretically, this book builds on the debates on power in global governance, notably in reconceiving global governance itself as social relations (Barnett & Duvall, 2005). In this new approach, it is not simply authority which "diffuses" (to other actors) but power itself (Guzzini & Neumann, 2012). The reconceptualization

is a shift from the governance literature's concern with liberal norms of accountability, legitimacy and of rules-based order. It expands on how systems of steering and control are increasingly ceded to market authority without the re-treading the zero-sum debate of states-versus-markets. It also invites full consideration of what it means to govern according to the governmental rationality of the market. It is especially interesting to unpack the role of the middle-men of migration because this specific cross-border mobility is rarely regulated by formal intergovernmental mechanisms (i.e. through the state's sovereign capacity). In other words, logics other than formal rule of law, are what shape actors' behaviours.

Without delving too deeply in debates in political theory about what "power" means, I mobilize Michel Foucault's genealogies to fashion a grid of analysis that makes visible the social relations among various actors and stakeholders as relations of power and as everyday practices of migration governance. From these genealogies, I develop four modalities—sovereignty, discipline, biopower and governmentality. This book contributes to the problematisation of the concept "governance"—now widely used in migration studies. It does so by making specific the *logics of power* and *logics of action* (Graz & Nölke, 2012, pp. 128–129) in what these various stakeholders do. The former emphasize the contiguity of coercion and consent in power relations. The latter refer to "procedures" that inhere in such relations (Graz & Nölke, 2008, p. 12).

The theoretical framework specifies how the four power modalities operate from their logics to their concrete practice. Foucault's "analytics" is suited for the purpose as it shifts the focus away from the state (i.e. juridical power or sovereignty) to follow ordering (and disordering) practices and techniques at the "extremities" of society—i.e. in everyday life. Secondly, the genealogies demonstrate how power is heterogeneous, that various forms of power may operate in a space. Third, Foucault's historical ethnographies describe in detail the techniques or "technologies" by which different power modalities are exercised. Fourth, his methodology does not necessarily delimit social relations to scalar categories (national, city-rural, intergovernmental, global etc.) but allow us to pay better attention to how micro practices in certain localities link to or add up to large macro processes. And lastly, Foucault's critique of political economy and his genealogy of neoliberalism focuses on the key concept of "human capital".

For neoliberals, human capital is that which enables a worker to earn a future income. The value of their labour is not simply weighted against time, i.e. the time it takes to produce a certain commodity in an industrial setting. Rather, innate predispositions, and skills acquired with "investments" through education, nutrition, and "care given", together comprise "abilities-machines" (Foucault, 2008, p. 229). In a labour market, therefore, what one sells is not simply one's time and labour power, but one's affects, artistry, and taste, among others. In today's "influencer" economy, this is no longer difficult to imagine. PREAs, on the other hand, may ascribe value to physical attributes, such as skin colour. In racist societies, a domestic worker with fairer skin will be more in-demand (and can command higher salaries) than ones with darker skin (Handapangoda, 2024, p. 259). In sexist societies,

only female graduates can "morph" into domestic workers overseas, as Orlando Ongpin above has seen in his years in business.

The discussion in this introductory chapter will situate the "international division of reproductive labour" (Parreñas, 2000) or the transnational organisation of domestic work within a globalising crisis in social reproduction. It will then unpack what we mean by the "market" and "market governance" and the roles played by private recruitment and employment agencies (PREAs) in this specific category of worker. It will conclude with a discussion of methodology and the outline of the chapters.

1.1 Domestic Work and the Privatisation of Social Reproduction

Changes in the structures of the global economy in the last half century include changes in the welfare state in liberal democracies in the Global North. What follows has been called "neoliberalism" (Harvey, 2007). Following the oil shocks of the 1970s, and the ballooning of debt in 1980s in the Global South, the suite of reforms endorsed by global financial institutions (i.e. the World Bank and the IMF), weakened the state's welfare functions in favour of reduced public spending and a leaner government. In practice this has meant the privatisation, liberalisation and deregulation of government-owned assets as well as opening up the domestic economy to foreign competitors. Fiscal responsibility has also reduced public spending in key sectors—e.g. education and healthcare (Overbeek & van Apeldoorn, 2012).

Women are expected to take up the slack by the vacuum left by the decrease or withdrawal of public welfare support. This has led to what has been called a crisis in social reproduction (Bakker & Gill, 2004, p. 37). Social reproduction "refers to the process involved in maintaining and reproducing people, specifically the labouring population, and their labour power on a daily and generational basis (Bezanson & Luxton, 2006, p. 3)." It is a concept born of feminist engagement with Marxism, which has limited its critique of capitalist development to the formal economy. This analytical blindness could not link the state, the market, the household and the family form. It certainly could not explain why there are an estimated 11.5 million domestic workers in countries not their own, and why some travel such distances to respond to demands in what is a globalising labour market. Today this phenomenon is referred to as an "international division of reproductive labour," (Parreñas, 2000), a "regime of labour intimacy (Chang & Ling, 2000)", or "global care chains" (Yeates, 2004).

The feminist critique of political economy inquires into how changes in the global economy impact households and vice versa (Elson, 1998). In the case of Malaysia, for example, the "import" of Filipina and Indonesian domestic workers undergird the country's New Economic Policy from 1971—in which migrant women "became boundary markers for and of the expanding Malaysian middle classes (Chin, 1998, p. 14)." The very presence of migrant domestic workers is

evidence of Malaysian modernity, in which the nuclear family became more dependent on capitalist markets rather than the extended family or community. Prior to an open migration policy, local Singaporean women also relied on extended family members and local domestic workers to help in household tasks and caregiving (Huang & Yeoh, 1996). The state's policy to maintain a high female labour participation rate while maintaining a family life meant that the import of domestic workers has become a permanent feature of Singapore's model of development.

With its withdrawal from social provisioning (i.e. decreased social spending), the state has increasingly privatised, that is off-loaded onto families, the problem of social reproduction. The "care deficit" that neither the state nor local women's unpaid reproductive labour has created is met with the import of migrant domestic workers. Middle class women buy themselves out their gender subordination by hiring a replacement. The latter are "ideal subjects" of neoliberal capitalist development for concealing both the rationale of their presence and the real dependency of their employers (Arat-Koç, 2006, p. 88). Households are the "safety net of last resort", able to absorb shocks that reverberate throughout the economy. The Covid-19 pandemic clearly demonstrated how this happens in practice, as schools closed and those who were able, worked from home. Evidence suggests that during the crisis, the burden of social reproduction was distributed unequally between men and women (Stevano et al., 2021).

So, neoliberal restructuring in advanced economies has increasingly privatised social reproduction. This has coincided with more and more women leaving the household and joining the formal workforce. The dual-income household may itself have been a response to changes in these economies' "post-war gender contract" and the sexual division of labour between male-breadwinner and female-homemaker (Fudge, 2014). Alternately, a more lean government meant less social protections, putting pressure on traditional single-income households. Instead of relying on the state and public funding, families are spending from their own pockets by transferring the labour previously performed by the housewife to the migrant domestic worker.

On the "supply-side", women who are "freed" from agrarian societies by the same expansionary logic of global capitalism ensure a ready pool of workers that could be recruited, trained and "exported" to meet global demand (Sassen, 2002). Structural adjustment programs from the late 1970s in the developing world increased economic vulnerability, pushing many to migrate in search of economic resources (Pettman, 1998). Migration has increasingly feminised in OECD countries from 1980 (Le Goff, 2016, p. 3). In Asia, more than half of migrants are women (58.2 percent). In the Southeast Asian region, an estimated 1.25 million are migrant domestic workers (ILO, 2021, p. 26).

From the 1980s, Malaysia and Singapore pursued policies that allowed them to rapidly ascend the global value chain, achieving newly-industrialising country status. Both countries' gender regimes meant that women were expected to perform dual roles as bearers of children as well as workers in the formal economy. Singapore's female labour force participation rates more than doubled in a span of three decades, from 19.3 percent in 1957 to 50.3 percent in 1990 (Huang & Yeoh,

1996, p. 482). In 2023, this figure is at 62.6 percent.[5] Malaysia's numbers are much more modest, having flatlined at the mid-40 s from the 1990s. In 2023, this figure is at 56.3 percent.[6] By 1994, there were 70,000 domestic workers from Indonesia and the Philippines working in the country legally (Chin, 1998, p. 104). In 2023, this figure is at estimated at 300,000 (ILO, 2023, p. 29). Singapore's Ministry of Manpower reports 276,600 in the same year.[7]

All these numbers indicate that foreign women replaced local women's unpaid reproductive labour at home. The import of domestic workers is a private cost borne by the household, without public investment in welfare. As such, Singaporean and Malaysian women could "safely realise the image of the modern liberated woman (Chin, 1998, p. 181)" without fundamentally contesting or changing patriarchal structures. In sum, changes in capital accumulation and the organisation of the global economy in the last half century could be felt all throughout the world, including at the level of individual households.

1.2 Market Logics in Global Migration Governance

"Governance" as a concept emerged from the business sector in the United States as firms sought to regain legitimacy and accountability within and among corporate entities and shareholders after the economic crisis of the 1970s. Later, the concept would be taken up by international institutions, notably the World Bank, and would then be disseminated to the rest of the United Nations system and implemented in various aid and development programmes around the world (Eagleton-Pierce, 2014). Neomarxist critiques of the global political economy have of course long framed this process within large structural changes in capitalism (Cammack, 2002; Cerny, 1995; Cox, 1992; Gill, 1998). The "regulatory state" in political economy off-shores governmental functions to private contractors in the name of market efficiency (Jayasuriya, 2005). States, bureaucratic agencies, private actors and other non-state groups must now form "transgovernmental networks" to govern specific jurisdictions across different countries (Cerny, 1997). In this schema, the state is still imagined as the locus of power in the international system, even as liberal civil society expands the grid of authority to include non-state actors in pursuit of shared interests. Governance is shared, contested, disaggregated, off-shored, delegated to or from the state, not only to provide global public goods, but also to guarantee the well-oiled functioning of an ever more interdependent global economy (Buthe & Mattli, 2011; Hofferberth, 2015; Lake, 2010; Weiss & Wilkinson, 2014).

[5] Department of Statistics Singapore, Labour, Employment, Wages and Productivity.

[6] Department of Statistics Malaysia Labour Market Information.

[7] Ministry of Manpower, Foreign workforce numbers.

For liberal thought in International Relations, states cooperate with each other and transnational civil society (which may or may not include market actors), as they pursue common interests as rational actors. Political economy, on the other hand, takes seriously the impact of neoliberal market logic in governance. If the field to be governed are transnational labour markets, and if the logic driving state rationality is a neoliberal sensibility (competition, efficiency), then the question of "who" governs must be further unpacked. The global governance literature is most mature in investigating certain aspects of the global economy—notably in trade and finance. As for cross-border labour flows, the literature on "migration governance" refer to all kinds of mobilities. It does not usually pertain to "trade" in labour *qua* labour. Workers are not commodities, until they are.

Private recruitment and employment agencies perform all kinds of tasks to facilitate labour export. They do labour arbitrage, linking job-seekers with employers. They serve quasi-bureaucratic functions such as documentation, processing procedures, and medical check-ups. They provide logistical services—accommodation in capital cities for those coming from far-away provinces, and transport and reception to and from countries of destination (Agunias, 2012; Elrick & Lewandowska, 2008). They may deploy migrants on credit, and have been called "informal banking institutions" that finance low-wage transnational labour migration (Chin, 1998, p. 114). They shape global labour markets by expanding and redirecting manpower pools and tapping into new labour sources.

Apart from the above, PREAs do commodify domestic workers, trading on identity markers to segment labour markets. Some nationalities are marketed at higher salary rates because they may be perceived as being "smarter". Their ability to speak another language, for example English, is seen as an advantage. Hierarchies of race are literally skin-deep, and the darker the skin, the less attractive workers are to employers (England & Stiell, 2008). Criteria for marketability and suitability include racialised and gendered notions of cleanliness, docility, temperament, among others (de Regt, 2009). Religion plays a role when it comes to suitability to handle pork and prepare non-halal meals or even simply to be able to practice one's religion in the employer's household (Lyons, 2005).

The broader migration studies literature situate PREAs in the "migration industry" (Gammeltoft-Hansen & Sorensen, 2013), and are part of "migration infrastructures" (Xiang & Lindquist, 2014). The literatures on labour brokerage focus specifically on brokers—their agency, identities, activities, and relationships with other actors (Fernandez, 2013; Kern & Müller-Böker, 2015; Picherit, 2018). While the Philippine state has been called a "broker" (Guevarra, 2009; Magalit-Rodriguez, 2010), the conceptual distinction between state and non-state actors makes it possible to make analytical distinctions between formal and informal mechanisms, or between licit and illicit (even illegal) practices. Literatures on labour brokerage tend to demonstrate how the state's delegation of functions to other actors enhances rather than diminishes migration control (Anderson & Franck, 2017). These other actors run the gamut, from small-town bureaucrats (Lindquist, 2012) to business-savvy entrepreneurs who are "at once market-fundamentalists but at the same time see and think like bureaucrats" (Xiang & Lindquist, 2018, p. 772).

1.2.1 The Migration Industry in Southeast Asia

From a sending country perspective, the Philippine state's labour brokerage has been described as "neoliberal" in its commodification and marketing of Filipino workers overseas (Guevarra, 2010; Magalit-Rodriguez, 2010). This migration regime can be traced to developments in the late 1960s, and institutionalised in the Labour Code of 1974, which put into place the migration bureaucracy. The Overseas Employment Development Board (OEDB) and the National Seamen Board (NSB) were established, later streamlined into what is now known as the Philippine Overseas Employment Administration (POEA). Their mandate was to create labour market development opportunities overseas. While the initial plan was for the state to monopolise labour export, the latter's inability to meet demand from overseas, as well as lobbying from both private recruitment agencies and migration bureaucrats, resulted in letting private recruiters take the lead again in 1978. In what has been called a "corporate export strategy" (Andersen, 2019, pp. 45–47), deployment increased tenfold between 1975 and 1983, from 36,035 to over 380,000 (Battistella, 1995, p. 259).

In Indonesia, overseas employment was seen as a solution to domestic unemployment from the 1960s. Between 1969 and 1979, official state sources documented 90,000 deployments. There were no statistical records on Indonesians who left for countries like Malaysia and the Middle East through unofficial channels (Palmer, 2016, pp. 24–25). In 2023, there are estimates of 9 million *Tenaga Kerja Indonesia* or Overseas Indonesian Workers (TKI), about half of whom are women working as domestic workers (UN Women, 2019, p. 200). Like the Philippines, Indonesia's migration regime was set up during an authoritarian period. And like the Philippines, labour export was part of its broader development project, aimed at solving a few different problems—namely unemployment and foreign exchange deficits. In 1983, the government officially set up the legal framework with which to regulate recruitment agencies through licensing and monitoring of deployments (Palmer, 2016, pp. 30–31). As exports increased annually, the Indonesian manpower ministry sought to grow the recruitment industry and enact policies to make TKI more competitive in overseas markets, in friendly competition with the Philippines. With this mindset, Minister Sudomo made a major change in the migration regime that forms the core business model of many labour exporting countries today—notably passing on the recruitment costs from employers to workers (Palmer, 2016, p. 37). This change would make these businesses wildly profitable, and from the destination countries' perspective, labour import became a logical, cheap solution to labour shortages.

In other words, the "market logics" of these large labour-exporting countries in Southeast Asia can be traced to developments in their respective political economies and development trajectories, buffeted by both internal and external factors. Labour export was a solution to a few different problems. And from the very beginning, both countries were explicitly oriented towards expanding labour market shares in target destination countries and sectors. Domestic work became lucrative for

recruitment agencies, especially when the tables turned and workers began shouldering recruitment costs. What were supposed to be stopgap measures to earn foreign exchange in the context of economic crises have become permanent features in both countries' economic development.

The question of labour rights and social protection became increasingly important as news of domestic workers' abuse or death overseas became more frequent. For the Philippines, the death of Flor Contemplacion in Singapore was a watershed moment, creating a political crisis that would again prompt changes in the migration regime (Chee, 2020, p. 373). A new law, Republic Act 8042 (Migrant Workers and Overseas Filipinos Act) was passed soon after her death in 1995. The suite of changes included the pre-departure orientation seminar (PDOS), in which workers undertake info-sessions that would prepare them for work in their destination country. The labour department then required basic housework training prior to deployment (Guevarra, 2006, p. 528). Finally, the Philippine state was expected to intervene on citizens' behalf if their labour rights were violated overseas.

The tensions between rights and market governance was evident in the different approach taken by the Senate and the Lower House. The latter insisted on the continued promotion of overseas migration while the former stated that labour export should not be used as a means to economic development. The compromise position was that people leave of their own volition, and that the state has no responsibility over migration (Battistella, 1995, p. 266). In the migration bureaucracy, there was also belief that upskilling and preparation would prevent abuse, and therefore the solution was to prepare the worker as much as possible for the employment and living conditions ahead. These measures do not fundamentally address the structural causes of abuse, but instead fosters a self-managing and self-directing subject (Chee, 2020) to better realise the aims of "neoliberal migrant citizenship", i.e. to work dutifully overseas, causing as little trouble as possible, and remit money back home (Magalit-Rodriguez, 2010, p. 96).

Indonesia likewise responded to repeated reports of violence against TKI with policy reforms that, on paper, better addressed labour and social protections. The horrific torture of domestic worker Nirmala Bonat in Malaysia also formed a backdrop to these changes. Law No. 39 of 2004 created a new government agency the BNP2TKI (National Agency for the Placement and Protection of Workers) especially dedicated to perform these tasks. The new legislation mandated the state's provision of legal assistance in the destination country, inclusion in an insurance program and info-sessions similar to the Philippine PDOS, the PAP. Measures were put in place to better streamline the migration process, and for the government to exert greater control, notably over illegal recruitment and training camps (Saraswati, 2008). Just like in the Philippines, the legal framework is a compromise among the competing interests of migrant advocates, the private sector and legislators. Of the various drafts presented by the different groups, the one offered by the government became the basis for deliberations. This decision was reportedly the result of "backroom deals in which ministry officials, labour recruitment companies and lawmakers" exchanged favours (Palmer, 2016, p. 58). Lastly, the point of the PAP and training is to create a worker that is *siap mental* or mentally ready (Prusinski, 2017),

rather than making structural changes to guarantee labour protection either in the bilateral relations of Indonesia and receiving countries, or even domestically. There is evidence these so-called preparatory processes may instead have disempowering effects (Killias, 2009).

Critics of this so-called neoliberalisation of migration (Magalit-Rodriguez, 2010; Menz, 2011) claim that the system is designed to push the cost of migration to workers themselves. Because the worker bears the cost of her deployment, labour brokerage essentially privatises the costs of migration. These arrangements are a kind of institutional fix resolving the conflict between the demand for migrant labour and immigration restriction (i.e. the need to placate host-country citizens who might resent claims of citizenship privileges). The privatisation of recruitment has made it expensive to migrate legally. Contracts stipulate that workers may not switch employers until the end of their term. For domestic workers especially, physical and metaphorical immobility guarantees that employers would be able to recoup their initial investment outlays in the worker, i.e. recruitment fees, medical checkups and levies.

Over the decades, PREAs have achieved a structural fixity in the development trajectories and migration governance of the four country cases in this book. There are industry associations who, in varying degrees, participate in creating policy environments, and industry standards. They lobby governments, much like any business or interest group.

The migration industry in the Philippines is organised and is seen as a stakeholder in Philippine migration governance. The largest industry association, the Philippine Association of Service Exporters (PASEI), was founded in 1980. Apart from participating in various fora to influence the Philippines' migration policies, PASEI has actively lobbied government legislation and executive orders (EOs). For example, it sought to nullify landmark RA 8042 (the Migrant Workers Act) a month after it passed into law. It wanted self-regulation and "private initiatives" to promote migrant workers' welfare and the country's development (Demaret, 2006, p. 141). PASEI has filed petitions that question the constitutionality of the migration bureaucracies' EOs that would restrict its business activities—e.g. deployment bans (*Philippine Association of Service Exporters v. Ruben Torres*, 1992). As of writing, PASEI has 168 members. There are other industry associations, for example the Overseas Placement Association of the Philippines (OPAP), which was established in 1977. It was initially organised to counter the government's attempt to stop these agencies from charging recruitment fees, per the 1974 Labour Code.[8]

Indonesia's largest industry association is the *Asosiasi Perusahaan Jasa Tenaga Kerja Indonesia*[9] (APJATI). It was established in 1981, initially to manage markets in the Middle East (A. Ananta & Arifin, 2004, p. 317). Part of its lobbying activities

[8] Overseas Placement Association of the Philippines, A brief history.

[9] Association of Indonesian Labour Service Companies.

have included paying for the government's overseas trips to ink bilateral agreements on recruitment. For example, the association paid for the travel, accommodation and even the per diem of the Indonesian delegation to a mission in Malaysia. The objective was to "demand a larger cut of the fees that their Malaysian business partners charge to migrant workers" (Palmer, 2016, p. 73). As of writing, APJATI has 400 members. Another example is that APJATI's rival organisation, *Himpunan Pengusaha Jasa Penempatan Tenaga Kerja Indonesia*[10] (HIMSATAKI), has strategically lobbied the Indonesian government to suspend placement of Indonesian workers (Karim, 2017, p. 459).

In Malaysia, the state had tried to centralise recruitment of migrant workers in 1995, under the Home Ministry's Foreign Workers Task Force to circumvent the power of these middlemen. Nevertheless, employers continued to use them. Malaysia re-legalised recruitment agencies in 2006, renaming them "outsourcing companies" (Garces-Mascarenas, 2011, p. 73). Malaysia has two main agency associations, the *Pertubuhan Kebangsaan Agensi Pekerjaan Swasta*[11] (PIKAP) and the *Persatuan Agensi Pembantu Rumah Asing*[12] (PAPA). PIKAP was established in 1999 and boasts a membership of 122 as of writing. PAPA was established in 1994. As with the industry associations mentioned above, these groups lobby stakeholders in favour of their business interests, and in so doing influence public policies. For example, PAPA would exert pressure on the Malaysian government to "create bilateral conflict around Indonesian interventions" (Palmer, 2016, p. 146).

Finally, Singapore's main industry association is the Association of Employment Agencies Singapore (AEAS). As of writing, the association has 306 members, nearly all of whom deal specifically with migrant domestic workers. The AEAS is an interest group that has forged stakeholder relationships not only with the Singapore government, but also with the Philippine government, indirectly through its dealings not only with the Philippine embassy (Marti, 2018, p. 1348), but other sending countries' diplomatic representations, e.g. Cambodia (Ministry of Foreign Affairs & International Cooperation, Cambodia, 2017), and Myanmar (OHCHR, 2015, p. 10).

While these industry associations represent registered and licensed agencies, there are plenty of fly-by-night and illegal operations that are beyond their control. While governments have made efforts to remove and ban illegal recruitment, it is not difficult to incorporate a new entity under a different name and begin operations again.

[10] Entrepreneurs Association of Indonesian Migrant Workers Placement Service.

[11] Malaysia National Association of Employment Agencies.

[12] Association of Foreign Maid Agencies.

1.2.2 What Is Neoliberal About This Type of Migration Governance?

What we call "neoliberalism" today is a governmental rationality underpinned by specific understandings of the economy, how it works, its relationship to states, civil society and individuals. The loci of public policy debates in the 1980s usually revolved around the extent to which policies were "market-friendly". At the global, macro level, neoliberal policies were implemented in many countries in the Global South under structural adjustment programs (SAPs) following multiple crises that scholars attribute to a transition to a different regime of capital accumulation, or simply a different model of capitalist development (Harvey, 2007). At the core of the developmental shift are the liberalisation, deregulation and privatisation of the economy. Apart from reduction in welfare and social services, the education and healthcare sectors were also increasingly privatised and run as businesses. These processes were supposed to stimulate growth. As mentioned above, these changes have created the conditions underpinning the mobility and living and working conditions of migrant domestic workers in what has been called the international division of reproductive labour (Parreñas, 2000). Divestment from welfare and reduced public spending on services combine to both feminise poverty in sending countries and privatise women's care burden in destination countries (Chant, 2008; Pearce, 1990).

Apart from these broad structural changes in the global economy, neoliberalism also brought with it a governmental ethos—beliefs about what the state should do vis-à-vis the rest of society. In classical liberalism, the question was whether or not government could interfere in market activities. In neoliberalism, this mechanism of *laissez-faire* has been replaced with one of competition. The object was no longer the tendency for people to barter but rather to create the right conditions in order for individuals to compete in a formal game of inequalities. The market in neoliberal thought is a constructed space of competition. It is no longer simply a mechanism of exchange. As such, the state must create policies to foster competition, and to make sure that anti-competitive mechanisms do not arise. It strives to generate social relations modelled on supply, demand and competition. Behaviours must therefore be produced through governmental intervention. The state intervenes *not* at the level of the economic processes (of production and exchange) but on social processes, on the population. The ideal subject of neoliberalism is one governed by freedom and choice (Foucault, 2008, pp. 118–123). Risk must be taken on by this individual, as insecurity is no longer socialised through welfare systems. In neoliberalism, the only "true and fundamental social policy" is economic growth, which raises incomes and purchasing power (Foucault, 2008, p. 144).

Lastly, neoliberalism has a normative theory for individuals. *Homo economicus* (economic man) is the ideal subject of a market society. This type of subject is no longer the utility-maximising one of classical liberalism but is rather an "entrepreneur of himself" (Foucault, 2008, p. 226). In neoliberal economic thought, specifically that of Gary Becker of the Chicago School, labour is reconceptualised as

"human capital". This kind of capital cannot be separated from the human being, unlike other forms (e.g. land, inputs) (Becker, 1992). The worker is an entrepreneur of herself, an "abilities-machine" who expects an income from physical attributes and non-physical talents. Being an entrepreneur, an increase in income entails investments—in health, education, training, etc. Foucault includes the factor of mobility in these investments, where migration is seen as an investment choice on foreseeable increase in income (Foucault, 2008, pp. 219–230).

To summarise, neoliberalism as a governmental rationality has to do with configuring not only the right mentality of the subjects of governance but also of the relationship between the state and non-state actors. The traditional separation between civil society and the state becomes blurred. Most importantly, this rationality gives the "market" the role to determine what counts as good governance, purportedly beyond the limited grasp of individual humans (Mavelli, 2019, p. 9). This means that markets are seen as tools which judge whether the government's actions are appropriate or not, useful or not, efficient or not. A neoliberal government intervenes through regulatory and organising actions. It must therefore be light on economic processes themselves but heavy on the regulation of social processes ("technical, scientific, legal, geographic…social factors") (Foucault, 2008, p. 141).

In migration governance, state apparatuses govern "at a distance" (Lu, 2011; Nair, 2010), steering the processes within which recruitment agencies, workers and other actors make decisions. Weak state regulation may be strategic, because state intervention is public cost. Indeed, the very diffusion or displacement of responsibility by the state may itself be a "management strategy" to deal with migrant workers (Chin, 2019). PREAs have filled the void where formal governmental processes have previously existed, or where they do not yet exist. At the same time, they maintain relationships with government agencies specialised in regulating migration. This book is focused on businesses that are operating with licenses, even though they may perform tasks that are not directly governed by law, or may stray beyond formal regulatory limits. At the same time, migrants themselves are not passive receivers of action, but actively participate in their migration trajectories, even under conditions that severely restrict their autonomy.

1.3 Theoretical Framework

The theoretical framework in this book builds on the critique of global governance as "postpolitical", something that happens "after goals are set and deliberations, argument, struggle, contest, and competition have played out" (Latham, 1999, p. 43). It also critiques the assumption that governance is the aggregate of individuals collectively pursuing common interests (Koenig-Archibugi & Zurn, 2006), or theories which demonstrate how new governance actors arise as new problems present themselves (Avant et al., 2010). It opens up the blackbox of "public-private partnerships", which governments use "in order to tackle cross-border challenges" (Greve & Hodge, 2010, p. 150).

When we examine private recruitment and employment agencies from the interdisciplinary lenses of everyday political economy, migration studies and power in global governance, we are able to fully flesh out PREAs' market authority as private or non-state actors in their everyday activities. Crucially, it focuses on their functions as entities whose primary business is the commodification and exchange of human capital. It is also worth emphasizing that this very specific process of human capital formation is gendered, reproducing gender norms necessary to commodify domestic work.

The book examines the relationships of these actors with other stakeholders—notably state apparatuses (or migration bureaucracies), non-governmental organizations and industry associations. Global governance theories see these relations as ones based either on economic utility and efficiency, on the one hand, and on questions of legitimacy and accountability, on the other. This book rather characterises these relationships as relations of power, and of different modalities as mentioned above (sovereignty, discipline, biopower and governmentality). It contests the implicit normative commitment to neoliberalism (privatisation, deregulation, liberalisation) (Graz & Nölke, 2012). These relations and everyday activities, together, constitute neoliberal migration governance. The authority or logic of the market is unpacked, demonstrating that the shaping and steering of labour demand, supply and prices are political processes rather than simply an effect of the collective "wisdom" of the market.

The mode of governance described here creates market value in what are essentially public-private partnerships (Elias, 2018). Migration bureaucracies' regulatory functions, where they exist, are caught between competing and often fully contradictory demands. On the one hand they are expected (i.e. lobbied by different stakeholders) to provide a modicum of welfare and protection to migrants. On the other hand, they are also expected to guarantee the viability of these actors as businesses even as they try to formalize and regulate them. This contradiction is difficult to resolve when, at the core of *market* governance lies not only promised efficiency (i.e. the most value for the least resources and effort), but that these markets need to be *deregulated* for continued expansion and growth. As a result, this market-driven neoliberal model often externalizes risk to workers, while guaranteeing a steady labour supply to destination countries and capital inflows to sending countries in the form of remittances. The book examines these contradictions in the relationships of these market actors with other stakeholders as stated above.

To detect the logics of power and logics of action performed by various actors, I develop an "analytics"[13] from Foucault's investigation of how power works in institutions far-removed from the state. In asylums, hospitals and prisons, among others, power was less "juridical", i.e. less about the prohibition of the law. His understanding of power underwent a transition, from one what was totalizing (best exemplified

[13] Foucault claimed that he did not want to offer a theory of power, but rather an "analytics of power" (Foucault, 1978, p. 82).

in *Discipline and Punish*), to one that was more heterogenous, where different forms could combine, be deployed, come together, or apart (Collier, 2009, p. 90).

From Foucault's genealogies, I create a typology with four forms of power—sovereignty, discipline, biopower and governmentality. And from these I elaborate on the logics of each, and outline how we may identify each one in action. I describe this typology in greater detail in Chap. 2. At this point, it may be useful to quickly summarise what each form entails. *Sovereignty* is the state apparatus' legislative power, and its dominion over a territory and a people. It is exercised through law-making, border enforcement, and the distinction between citizen and foreigner. *Discipline* was born in the industrial age, and works to extract labour power, i.e. to make bodies productive. While sovereignty is enforced through compliance with the law on threat of punishment (i.e. jail time), discipline is enforced through observation, records-keeping, and the creation of the standardised norm to which individuals should conform. Biopower is exercised on a population as a mass of bodies that are born, fall sick, age, and eventually die. We can detect biopower through actions that regulate reproduction, mortality rates, and migration. Finally, *governmentality* is power that creates markets in goods, capital, and labour, and ensures their growth and expansion. It is exercised on individuals who are "entrepreneurial" in a society that is modelled as an economy.

This analytical framework can capture the logics of and actions in a globalising labour market—from rural villages in Java to capital cities in Southeast Asia and elsewhere. This "grid of analysis" can connect individuals, households, sovereign territories, and living populations. The granularity afforded by this framework is able to follow the migrant domestic worker's trajectory—from the moment of recruitment and training in her home country, to deployment and management in the host country.

1.4 Methodology

Domestic worker migration as an empirical phenomenon traverses a vast geographic, cultural, political and economic space. I needed to imagine a series of events unfolding through time, and my field sites, and then to coherently stitch events as meaningful in some way. This process of construction is what has been called "multi-sited ethnography" (Marcus, 1995), or a "theoretically-driven ethnography" (Tavory & Timmermans, 2009, p. 244). It does not seek new theory from the ground, but instead extends theory to account for anomalies (Burawoy, 2000), where events happening simultaneously in locales that may be very far apart are interpreted as being connected and having effects on each other. It also entails figuring out the relationship of the local to the global, and if and why a cultural formation matters to a system, or is an example of something larger and systemic.

The research design is abductive, which follows a "circular-spiral" pattern "in which the puzzling requires an engagement with multiple pieces at once" (Schwartz-Shea & Yanow, 2012, p. 9). Abduction requires a "double fitting" in which

situations are "tailored to fit a theory" on the one hand, and in which theory is "tailored to a case" on the other (Burawoy, 1998, p. 24). Induction and deduction tend to be more linear and step-wise in their logic—"first this, then that". These features contrast with the hypothesis-testing model which requires a lot of "front-loading". In these kinds of research design there is a tremendous amount of work done in formulating hypotheses, designating variables and designing tests. In short, there is already quite a lot of "knowns", but one modifies one's lenses and questions as one learns more and more from the field (Pader, 2014). Abductive logic, by contrast, assumes a lot of "unknowns" and going to the field implies more than just testing one's hypotheses.

If the broad phenomenon to study is a category of people moving across sovereign territories for employment, why is this meaningful to whom and why? It took a while to build a case, i.e. to "see" the case from a disciplinary point of view and to represent it as meaningful for various reasons. I could not find anything that was particular or puzzling from theory. The puzzle needed to come from the empirics, and this only became evident after I had gone to the field and had some sense of what was going on "out there".

It was Michel Foucault's idea that power was a "system of correlation" or a "grid of analysis" that inspired constructing an analytics—a tool with which I could at least differentiate the modalities one from the other. I fashioned an analytics before leaving for fieldwork, one which outlined the techniques of the power forms. I initially went out with only three—sovereignty, discipline and governmentality. After coming back from the field I added a fourth one—biopower—and thought it was sufficiently distinctive from the others to merit a separate modality.

My analytics rather functioned as a sieve which filtered the events, discourses, documents and other sources of data I encountered while immersed in fieldwork. It helped structure the data I co-generated into practices and then sorted these practices into power modalities. It allowed me to analytically break down the phenomenon I was interested in, and in which I eventually found myself conducting fieldwork. However it did not provide me with the narrative arc or story that made this book hang together. For that, I relied on the migrant trajectory that I broke into stages as seen in my empirical chapters—recruitment, training, and management. The empirics and the migrant trajectory are as important as the analytics, without which this whole project would not make any meaningful sense.

I conducted nearly 8 months of fieldwork in Manila, Jakarta, Kuala Lumpur and Singapore from February to September 2013. While there is secondary literature on recruitment agencies deploying domestic workers from other social science disciplines, there was very little primary data about them at the time. I could not therefore use statistical methods, archival work or discourse analysis. This may be due to a few reasons, one of which is the rather questionable reputation of the industry and its practices, as highlighted by occasional news about exploitation and abuse of workers. Also, domestic work exists in a liminal vacuum, it has remained largely outside the purview of state apparatuses' accounting and documentation. Since then, there has been greater visibility of recruitment and employment agencies, notably the listing of duly registered and accredited ones on the websites of the

Philippines' Department of Migrant Workers,[14] Indonesia's *Badan Pelindungan Pekerja Migran Indonesia*[15] (BP2MI), Malaysia's Ministry of Human Resources[16] (MOHR), and Singapore's Ministry of Manpower[17] (MOM).

Over the last decade, the lists have gotten more detailed, especially Singapore's. The Philippines' list used to be hosted on the website of the Philippine Overseas Employment Administration, but has been moved to the newly-created Department of Migrant Workers. In 2013, Indonesia and Malaysia did not publish their list online (Tables 1.1 and 1.2).

The decision to focus on Southeast Asia and on four countries in particular is a result of a few factors. The migration of domestic workers has been regularly occurring in this region for over four decades. Scholars trace the phenomenon of migration in Asia to the debt crisis and the quadrupling of oil prices in the 1970s (Chin, 1998, p. 96; Jones & Pardthaisong, 1999, p. 33). These large structural changes triggered a need for developing countries to balance payments and earn foreign exchange. The first wave of contractual migrants comprised of male construction workers bound for the Middle East. In the 1980s, the women followed suit to work as domestic workers in Hong Kong and other Asian newly-industrialising countries (NICs) (Constable, 2007, p. 17). While there has been migration from Indonesia

Table 1.1 Fieldwork respondents

Respondents in interviews	Manila	Jakarta	Kuala Lumpur	Singapore
Recruitment agent /training centre staff	15	10	5	8
Non-governmental organisation staff	3	4	2	2
Government official	5	7	1[a]	1[b]
Domestic worker	0	2	5	0
Total: 70	20	23	13	11

[a]Indonesian embassy official
[b]Philippine embassy official

Table 1.2 Fieldwork institutions

	Manila	Jakarta	Kuala Lumpur	Singapore
PREAs	11	3	3	7
Agency association	0	2	1	0
Training centres	3	3	0	0
Government offices / ministries	3	4	1	1
Non-governmental organisations	3	3	2	2

[14] Department of Migrant Workers, Licensed recruitment agencies.

[15] Indonesian Migrant Worker Protection Agency, List of agencies (Indonesian Migrant Worker Protection Agency).

[16] Ministry of Human Resources, List of private employment agencies.

[17] Ministry of Manpower, Employment agencies.

since the 1970s, rates increased dramatically after the 1997 Asian financial crisis (Wee & Sim, 2004, p. 180). In all, migration was the answer to two problems—earning foreign exchange to keep up with the balance of payments due to the series of oil price hikes and as a temporary solution to unemployment. The Philippines and Indonesia are the two largest deploying countries in Southeast Asia, sending domestic workers not only to Malaysia and Singapore but also to East Asia and the Middle East. Being the first-movers, many of the recruitment practices, industry trends, and consequently the regulatory mechanisms developed to govern this phenomenon, originated in the region and may be diffusing to other migrant sending and receiving countries as well.

1.4.1 Access

The most challenging aspect of fieldwork was gaining access to respondents. This project has the handicap of "studying up (Lie, 2013)," that is, interviewing subjects who are in positions of power, and with whom I had very little with which to bargain to garner cooperation. I was not an insider who had privileged access to these circles. I had to expend considerable effort and emotion work to suppress fear and anxiety in the duration of fieldwork (Hubbard et al., 2001). My main subjects, the recruiters, are gatekeepers in the truest sense of the word, and I had to work doubly hard to show empathy, to struggle to see things through their eyes in order to gain their trust even as I tried to evaluate the position from which their "truths (Emerson et al., 2011, p. 4)," and even lies and evasions, were coming from (Fujii, 2010).

My first point of access was through publicly-listed e-mail and snail mail addresses on government websites as well as the webpages of recruitment agencies, government offices and non-governmental organisations. Where e-mail addresses were not published, I made phone calls. At first, I did this rather arbitrarily. As mentioned previously, the Philippine online database did not distinguish types of deployment per recruitment agency. I later found out that these agencies advertised in online employment portals—and there they explicitly announced they were looking for domestic workers. I also relied on referrals from my respondents. In Manila, my impression was that many of these agencies knew each other and had either positive or negative opinions about how rival businesses were run. A few of my respondents were in close enough contact with the migration bureaucracy that they referred to some key government officials by their first name. One even called up a high-ranking bureaucrat on her mobile phone to advocate on my behalf, asking if said official could possibly grant me an interview. Two of my NGO respondents also referred recruitment agencies and had spoken about working with the industry within the context of policy briefings with government.

In Jakarta, my first points of entry were two industry associations, some NGO workers, and government officials in the migration bureaucracy. I relied mostly on referrals from respondents who had agreed to speak with me because most of the government websites were in Bahasa Indonesia and I could not mine portals and

databases as I did in Manila. On a few occasions, I simply went in person to relevant government offices, introduced myself, and handed my paperwork. I also went in person to an industry association since they were not responding to my e-mails. In Jakarta, I found that showing up in person was more likely to get me access rather than through correspondence, as in Manila.

In Kuala Lumpur, I failed to access any of the relevant government ministries despite repeated e-mails and follow-up phone calls. The ministries were inaccessible in literal and figurative ways compared to Manila and Jakarta. Most were far from Kuala Lumpur—they were all clustered in Putra Jaya, about an hour and a half away by train and bus. Also given the size and structure of the buildings and the way they had set up points of entry (and also given the culture of the bureaucracy)—it was impossible to do unscheduled interviews, as I did in Jakarta. It was quite interesting how the organisation of space quite literally permitted or disallowed things to take place.

In Singapore, I sent correspondence to agencies published in the Ministry of Manpower online database and the member listing of the local employment agency association. The MOM database was quite detailed—indicating not only the agency name, contact information, key employees but also how long the agencies have been in business and the volume of their deployment. As in Malaysia, I was unsuccessful in securing an interview with relevant offices in the Ministry of Manpower. In all, agencies which chose to participate in the research were very cognisant of the changing policy terrain and the new regulations from the MOM. These were the small and one-person businesses. I could not access any of the big volume deployers, despite repeated attempts.

In all four cities, those who agreed to receive me in their offices and granted me interviews were self-selecting. Generally the respondents in Manila seemed to be more habituated to being subjects of research, evidenced by references to other researchers who had interviewed them, both local and foreign. One industry association had also asked me to sign a pre-prepared document for researchers asking for an interview.

1.4.2 Embodied Researcher

While in the field, my nationality helped gain access to some sites and respondents and likely worked in the opposite in others. My gender was also a handicap in some aspects, and again an advantage in certain contexts. In unknown territory, being a foreigner helped embolden me, mostly because my ignorance of norms and proper conduct meant I did not know what was unreasonable to ask. I could push and prod when I could not in Manila because I could quite clearly interpret when my respondents or people in the environment were resisting queries or sending signals that I was not welcome. Also, being a foreigner meant my respondents were more tolerant of me and what could be my inappropriate requests or behaviour. Being Filipino, Indonesians—both government officials and the recruiters—knew that we shared an

affinity in terms of sending migrant workers abroad. The government officials candidly admitted they "copied everything" from us. Even one recruiter said he watched out for what Filipino recruiters did. I think they granted me access because they wanted to show me that they were improving on these practices. Instructors and staff from agencies also said they wanted to make Indonesian workers are "strong" as Filipina workers.

In Manila, having been a PhD researcher from the National University of Singapore brought with it a certain prestige. The Philippine migration bureaucracy was well-researched, and I found that some of my respondents had agreed to be research participants in previous projects. Knowledge of being researched meant that they were conscious that the end-product would become a social artefact, and whatever they said would be taken as truth. Many of my respondents in Manila always brought up the issue of deregulation. In a few phone calls where I was following up on correspondence, some Singapore agencies repeatedly told me how they thought some of the new regulations were unreasonable. There was a sense that being a researcher meant I could relay their concerns and demands to the public. There were those who had positive reactions to being part of knowledge production—those who were flattered and excited to make a contribution. Then there were those who were very wary of my presence. Because I had a Chinese name, some respondents naturally assumed I was Singaporean. That may have made it easier or difficult to gain access, depending on the context.

Because an interview is a two-way communication, I was not the only one "extracting" data. Often my respondents would ask me about details of my research, preliminary findings, and even what other respondents were saying. I then needed to respond to such queries. I realised that whatever I said always prompted a reaction from the other person which would then shape the rest of our interactions. These responses were often very telling, and a source of data themselves. I also understood that these self-selected respondents gave me information that would present their business in a good light. A few of them explicitly expressed that they counted on me to deliver the message to the public and even to policy circles that they were doing good, that they were doing the unemployed a service, and that they needed less regulation from government. It was clear that I was being viewed as an advocate on their behalf, someone who could represent them in a positive way. I found that certain respondents went further than observing the standard practices of courtesy in an effort to gain my sympathy, and thus a favourable representation of their agency.

1.5 Structure of the Book

The introductory chapter has laid out the empirical and theoretical contexts of the study, centring the puzzle of the preponderance of PREAs in the migration governance of domestic work in Southeast Asia. Chapter 2 outlines a theoretical framework that reconceptualises "governance" as relations of power, and in doing so, decentres the state. It develops an analytical tool with which to unpack social

relations as everyday practices of state bureaucracies, employers, and workers, apart from PREAs themselves. The primary focus on PREAs as market actors also unpacks what is meant by "market authority", "market-based decision-making" or "market logics". This focus re-conceptualises markets as cultural phenomena rather than abstractions of supply, demand and prices. PREAs are then contextualised in webs of institutions and social relationships. Lastly, I draw from Michel Foucault's genealogies of power to construct a grid of analysis that is able to translate power as everyday practices that can accommodate the interactions of many different actors. The heart of the book are three empirical chapters which examine three stages of the migration trajectory—recruitment, training (which takes place in sending countries), and management (the process of continued engagement usually by the partner employment agency in the receiving country). The first stage relates to the processes of recruitment itself, where agents post job ads and screen potential candidates. Training may take up to 3 months long, and is the period where workers are housed in training centres to learn practical and language skills before they are deployed to employer households. The last stage pertains to the continued involvement of the employment agency at the destination country to "manage" employer-employee relations, implement the terms of the employment contract, solve conflict, and govern workers' leisure time where they are able to take days off. The concluding chapter looks at the implications of neoliberal migration governance of domestic worker migration in Southeast Asia and beyond. It will survey some of the attempts at standard setting of recruitment agencies, and evaluates the available political avenues for domestic worker organizing.

References

Agunias, D. (2012). Regulating private recruitment in the Asia-Middle East labour migration corridor, 4.

Ananta, A., & Arifin, E. (2004). *International migration in Southeast Asia*. Institute of Southeast Asian Studies. https://bookshop.iseas.edu.sg/publication/1141

Andersen, N. T. (2019). *Labor pioneers: Economy, labor and migration in Filipino-Danish relations, 1950–2015*. Ateneo de Manila University Press.

Anderson, J. T., & Franck, A. K. (2017). The public and the private in guestworker schemes: Examples from Malaysia and the U.S. *Journal of Ethnic and Migration Studies, 0*(0), 1–17. https://doi.org/10.1080/1369183X.2017.1415752

Arat-Koç, S. (2006). Whose social reproduction? Transnational motherhood and challenges to feminist political economy. In *Social reproduction: Feminist political economy challenges neoliberalism* (pp. 75–92). McGill-Queen's University Press.

Avant, D., Finnemore, M., & Sells, S. (2010). *Who governs the globe?* Cambridge University Press.

Bakker, I., & Gill, S. (2004). *Power, production and social reproduction*. Palgrave Macmillan. https://doi.org/10.1057/9780230522404

Barnett, M., & Duvall, R. (2005). *Power in global governance*. Cambridge University Press.

Battistella, G. (1995). Philippine overseas labour: From export to management. *ASEAN Economic Bulletin, 12*(2), 257–273. https://doi.org/10.1355/ae12-2j

Becker, G. S. (1992). Human capital and the economy. *Proceedings of the American Philosophical Society, 136*(1), 85–92.

Betts, A. (2013). The migration industry in global migration governance. In *The migration industry and the commercialization of international migration* (pp. 45–63). Routledge. https://doi.org/10.4324/9780203082737

Bezanson, K., & Luxton, M. (2006). *Social reproduction: Feminist political economy challenges neo-liberalism*. McGill-Queen's University Press.

Burawoy, M. (1998). The extended case method. *Sociological Theory, 16*(1), 4–33. https://doi.org/10.1111/0735-2751.00040

Burawoy, M. (2000). Global ethnography: Forces, connections, and imaginations in a postmodern world. *World, 28*, 392. https://doi.org/10.1146/annurev.soc.28.110601.140945

Buthe, T., & Mattli, W. (2011). *The new global rulers: The privatization of regulation int he world economy*. Princeton University Press.

Cammack, P. (2002). The governance of global capitalism: A new materialist perspective. *Development, 11*(2), 37–59. https://doi.org/10.1163/156920603768311228

Cerny, P. G. (1995). Globalization and the changing logic of collective action. *International Organization, 49*(4), 595–625.

Cerny, P. G. (1997). Paradoxes of the competition state: The dynamics of political globalization. *Government and Opposition, 32*(2), 251–274. https://doi.org/10.1111/j.1477-7053.1997.tb00161.x

Chang, K., & Ling, L. H. M. (2000). Globalisation and its intimate other: Filipina domestic workers in Hong Kong. In M. Marchand (Ed.), *Gender and global restructuring: Sightings, sites and resistances* (pp. 27–43). Routledge.

Chant, S. (2008). The 'Feminisation of Poverty' and the 'Feminisation' of anti-poverty programmes: Room for revision? *The Journal of Development Studies, 44*(2), 165–197. https://doi.org/10.1080/00220380701789810

Chee, L. (2020). "Supermaids": Hyper-resilient subjects in neoliberal migration governance. *International Political Sociology, 14*(4), 366–381.

Chin, C. (1998). *In service and servitude: Female domestic workers and the Malaysian "modernity" project*. Columbia University Press.

Chin, C. (2019). Precarious work and its complicit network: Migrant labour in Singapore. *Journal of Contemporary Asia, 49*(4), 528–551. https://doi.org/10.1080/00472336.2019.1572209

Coen, D., & Pegram, T. (2015). Wanted: A third generation of global governance research. *Governance: An International Journal of Policy, Administration, and Institutions, 28*(4), 417–420. https://doi.org/10.1111/gove.12164

Collier, S. J. (2009). Topologies of power: Foucault's analysis of political government beyond "Governmentality". *Theory, Culture & Society, 26*(6), 78–108.

Constable, N. (2007). *Maid to order in Hong Kong*. Cornell University Press. https://doi.org/10.7591/9780801460463

Cox, R. W. (1992). Global perestroika. *Socialist Register, 28*, 26–43.

Cutler, C., Haufler, V., & Porter, T. (1999). *Private authority in international affairs*. SUNY Press.

Davies, J. (2011). Challenging governance theory: From networks to hegemony. *Public Administration, 90*(2), 555–558. https://doi.org/10.2139/ssrn.1873419

de Regt, M. (2009). Preferences and prejudices: Employers' views on domestic workers in the Republic of Yemen. *Signs, 34*(3), 559–581. https://doi.org/10.1086/593330

Demaret, L. (2006). Private employment agencies: The challenges from the workers' perspective. In *Merchants of labour* (pp. 159–168). ILO.

Eagleton-Pierce, M. (2014). The concept of governance in the spirit of capitalism. *Critical Policy Studies, 8*(1), 5–21. https://doi.org/10.1080/19460171.2014.883854

Elias, J. (2018). Governing domestic worker migration in Southeast Asia: Public–private partnerships, regulatory grey zones and the household. *Journal of Contemporary Asia, 48*(2), 278–300. https://doi.org/10.1080/00472336.2017.1392586

Elrick, T., & Lewandowska, E. (2008). Matching and making labour demand and supply: Agents in polish migrant networks of domestic elderly care in Germany and Italy. *Journal of Ethnic and Migration Studies, 34*(5), 717–734. https://doi.org/10.1080/13691830802105954

Elson, D. (1998). The economic, the political and the domestic: Businesses, states and households in the organisation of production. *New Political Economy, 3*(2), 189–208.

Emerson, R. M., Fretz, R. I., & Shaw, L. L. (2011). *Writing ethnographic fieldnotes* (2nd ed.). University of Chicago Press. https://press.uchicago.edu/ucp/books/book/chicago/W/bo12182616.html

England, K., & Stiell, B. (2008). They think you are as stupid as your English is: Constructing domestic Workers in Toronto. *Feminisms in Geography: Rethinking Space, Places, and Knowledge, 29*(1994), 195–215.

Fernandez, B. (2013). Traffickers, brokers, employment agents, and social networks: The regulation of intermediaries in the migration of Ethiopian domestic workers to the middle east. *International Migration Review, 47*(4), 814–843. https://doi.org/10.1111/imre.12049

Foucault, M. (1978). *The history of sexuality: Volume I an introduction*. Pantheon Books.

Foucault, M. (2008). *The birth of biopolitics: Lectures at college de France 1978–1979*. Palgrave Macmillan.

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

Fujii, L. A. (2010). Shades of truth and lies: Interpreting testimonies of war and violence. *Journal of Peace Research, 47*(2), 231–241. https://doi.org/10.1177/0022343309353097

Gammeltoft-Hansen, T., & Sorensen, N. N. (2013). *The migration industry and the commercialization of international migration*. Routledge.

Garces-Mascarenas, B. (2011). Labour migration regulation in Malaysia: A policy of high numbers and low rights. In *Constructing and imagining labour migration: Perspectives of control from five continents* (pp. 65–86). Ashgate Publishing.

Gill, S. (1998). New constitutionalism, democratisation and global political economy. *Pacifica Review: Peace, Security & Global Change, 10*(1), 23–38. https://doi.org/10.1080/14781159808412845

Graz, J.-C., & Nölke, A. (2008). *Transnational private governance and its limits*. Routledge.

Graz, J.-C., & Nölke, A. (2012). The limits of transnational private governance. In S. Guzzini & I. B. Neumann (Eds.), *The diffusion of power in global governance: International political economy meets Foucault* (pp. 118–140). Palgrave Macmillan. https://doi.org/10.1057/9781137283559_5

Greve, C., & Hodge, G. (2010). Public-private partnerships and public governance challenges. In *The new public governance? Emerging perspectives on the theory and practice of public governance*. Routledge.

Guevarra, A. R. (2006). Managing "vulnerabilities" and "empowering" migrant Filipina workers: The Philippines' overseas employment program. *Social Identities, 12*(5), 523–541. https://doi.org/10.1080/13504630600920118

Guevarra, A. R. (2009). *The transnational labor brokering of Filipino workers*. Rutgers University Press.

Guevarra, A. R. (2010). *Marketing dreams, manufacturing heroes: The transnational labor brokering of Filipino workers*. Rutgers University Press.

Guzzini, S., & Neumann, I. B. (2012). *The diffusion of power in global governance: International political economy meets Foucault*. Palgrave Macmillan.

Hall, R. B., & Biersteker, T. (2004). *The emergence of private authority in global governance*. Cambridge University Press.

Handapangoda, W. S. (2024). The making of "passengers": The pre-departure subjectivation of Sri Lanka's aspiring migrant domestic workers heading to the Arabian gulf. *Global Society, 38*(2), 248–268. https://doi.org/10.1080/13600826.2023.2263886

Hansson, E., & Weiss, M. L. (Eds.). (2023). *Routledge handbook of civil and uncivil society in Southeast Asia*. Taylor & Francis. https://doi.org/10.4324/9780367422080

Harvey, D. (2007). Neoliberalism as creative destruction. *The Annals of the American Academy of Political and Social Science, 610*(1), 22–44. https://doi.org/10.1177/0002716206296780

Hofferberth, M. (2015). Mapping the meanings of global governance: A conceptual reconstruction of a floating signifier. *Millennium – Journal of International Studies, 43*(2), 598–617. https://doi.org/10.1177/0305829814561539

Huang, S., & Yeoh, B. S. A. (1996). Ties that bind: State policy and migrant female domestic helpers in Singapore. *Geoforum, 27*(4), 479–493.

Hubbard, G., Backett-Milburn, K., & Kemmer, D. (2001). Working with emotion: Issues for the researcher in fieldwork and teamwork. *International Journal of Social Research Methodology, 4*(2), 119–137. https://doi.org/10.1080/13645570116992

ILO. (2021). *Making decent work a reality for domestic workers: Progress and prospects ten years after the adoption of the Domestic Workers Convention, 2011 (No. 189)*. ILO.

ILO. (2023). *Skilled to care, forced to work? Recognizing the skill profiles of migrant domestic workers in ASEAN amid forced labour and exploitation*. ILO.

Jayasuriya, K. (2005). Beyond institutional fetishism: From the developmental to the regulatory state. *New Political Economy, 10*(3), 381–387. https://doi.org/10.1080/13563460500204290

Jessop, B. (2015). The course, contradictions, and consequences of extending competition as a mode of (meta-)governance: Towards a sociology of competition and its limits. *Distinktion: Journal of Social Theory, 16*(2), 167–185. https://doi.org/10.1080/1600910X.2015.1028418

Jones, H., & Pardthaisong, T. (1999). The commodification of international migration: Findings from Thailand. *Tijdrschrift Voor Economische En Sociale Geografie, 90*(1), 32–46.

Karim, M. F. (2017). Institutional dynamics of regulatory actors in the recruitment of migrant workers: The case of Indonesia. *Asian Journal of Social Science, 45*(4–5), 440–464. https://doi.org/10.1163/15685314-04504004

Kern, A., & Müller-Böker, U. (2015). The middle space of migration: A case study on brokerage and recruitment agencies in Nepal. *Geoforum, 65*, 158–169. https://doi.org/10.1016/j.geoforum.2015.07.024

Killias, O. (2009). The politics of bondage in the recruitment, training and placement of Indonesian migrant domestic workers. *Sociologus, 59*(2), 145–172. https://doi.org/10.3790/soc.59.2.145

Koenig-Archibugi, M., & Zurn, M. (2006). *New modes of governance in the global system: Exploring publicness, delegation and inclusiveness*. Palgrave Macmillan. https://link.springer.com/book/10.1057/9780230372887

Lake, D. A. (2010). Rightful rules: Authority, order, and the foundations of global governance. *International Studies Quarterly, 54*(3), 587–613. https://doi.org/10.1111/j.1468-2478.2010.00601.x

Latham, R. (1999). Politics in a floating world: Toward a critique of global governance. In *Approaches to global governance theory* (pp. 23–53). State University of New York Press.

Le Goff, M. (2016). *Feminization of migration and trends in remittances (220)*. IZA World of Labor. https://doi.org/10.15185/izawol.220

Lie, J. H. S. (2013). Challenging anthropology: Anthropological reflections on the ethnographic turn in international relations. *Millennium, 41*(2), 201–220. https://doi.org/10.1177/0305829812463835

Lindquist, J. (2012). The elementary school teacher, the thug and his grandmother: Informal brokers and transnational migration from Indonesia. *Pacific Affairs, 85*(1), 69–89.

Lu, M. C.-W. (2011). Examining labour migration regimes in East Asia: Appearance and technique of control in Taiwan. In *Constructing and imagining labour migration: Perspectives of control from five continents* (pp. 87–108). Routledge.

Lyons, L. T. (2005). Embodying transnationalism: The making of the Indonesian maid. In *Corporeal inscriptions: Representations of the body in cultural and literary texts and practices* (pp. 171–185). Nicolas Copernicus University Press.

Magalit-Rodriguez, R. (2010). *Migrants for export: How the Philippine state brokers labor to the world*. University of Minnesota Press.

Marcus, G. E. (1995). Ethnography in/of the world system: The emergence of multi-sited ethnography. *Annual Review of Anthropology, 24*(1), 95–117. https://doi.org/10.1146/annurev.an.24.100195.000523

Marti, G. (2018). The effects of multilevel governance on the rights of migrant domestic workers in Singapore. *Journal of Ethnic and Migration Studies, 45*(8), 1345–1360.
Mavelli, L. (2019). Neoliberalism as religion: Sacralization of the market and post-truth politics. *International Political Sociology, 14*(1), 57–76. https://doi.org/10.1093/ips/olz021
Menz, G. (2011). Neo-liberalism, privatization and the outsourcing of migration management: A five-country comparison. *Competition and Change, 15*(2), 116–135. https://doi.org/10.1179/102452911X13025292603633
Ministry of Foreign Affairs & International Cooperation, Cambodia. (2017, August 1). *Meeting between Ambassador Ngoun Sokveng and Association of Employment Agents (Singapore).* https://www.mfaic.gov.kh/posts/post-12015
Nair, S. (2010). Sovereignty, security, and migrants: Making bare life. In S. Biswas & S. Nair (Eds.), *International relations and states of exception: Margins, peripheries, and excluded bodies* (pp. 95–115). Routledge.
OHCHR. (2015). *A submission by Humanitarian Organization for Migration Economics (HOME) and Migrant Worker Rights Network (MWRN) for the 23rd Session of the Universal Periodic Review*. https://uprdoc.ohchr.org/uprweb/downloadfile.aspx?filename=1991&file=EnglishTranslation
Overbeek, H. (2004). Global governance, class, hegemony: A historical materialist perspective. *Political Science, 22*. https://doi.org/10.4324/9780203002810
Overbeek, H., & van Apeldoorn, B. (2012). *Neoliberalism in crisis*. Palgrave Macmillan.
Pader, E. (2014). Seeing with an ethnographic sensibility: Explorations beneath the surface of public policies. In *Interpretation and method* (2nd ed.). Routledge.
Palmer, W. (2016). *Indonesia's overseas labour migration programme, 1969-2010*. Brill. https://brill.com/display/title/33687
Parreñas, R. S. (2000). Migrant Filipina domestic workers and the international division of reproductive labor. *Gender & Society, 14*(4), 560–580.
Pearce, D. (1990). The feminization of poverty. *Journal for Peace and Justice Studies, 2*(1), 1–20. https://doi.org/10.5840/peacejustice19902113
Pettman, J. J. (1998). Women on the move: Globalisation and labour migration from south and Southeast Asian states. *Global Society, 12*(3), 389–403. https://doi.org/10.1080/13600829808443172
Philippine Association of Service Exporters v. Ruben Torres, G.R. No. 101279 (Republic of the Philippines Supreme Court August 6, 1992). https://lawphil.net/judjuris/juri1992/aug1992/gr_101279_1992.html
Picherit, D. (2018). Labour migration brokerage and Dalit politics in Andhra Pradesh: A Dalit fabric of labour circulation. *Journal of Ethnic and Migration Studies, 0*(0), 1–17. https://doi.org/10.1080/1369183X.2018.1528101
Prusinski, E. (2017). Becoming siap mental: Education for transnational labour migration. *Ethnography and Education, 12*(3), 329–346. https://doi.org/10.1080/17457823.2016.1253025
Rosenau, J. N. (1992). Governance, order, and change in world politics. In *Governance without government: Order and change in world politics* (pp. 1–29).
Saraswati, J. (2008). *"Where we can go?": Indonesia's struggle against unemployment and manpower export phenomenon. (53; COMCAD Arbeitspapiere – Working Papers)*. Centre on Migration, Citizenship and Development.
Sassen, S. (2002). Global cities and survival circuits. Global Woman, October, 254–316. https://doi.org/10.1017/CBO9781107415324.004.
Schwartz-Shea, P., & Yanow, D. (2012). *Interpretive research design: Basic concepts and processes* (pp. 1–179). Routledge. https://doi.org/10.1111/j.1365-2575.2011.00387.x
Shire, K. (2020). The social order of transnational migration markets. *Global Networks, 20*(3), 434–453. https://doi.org/10.1111/glob.12285
Stevano, S., Mezzadri, A., Lombardozzi, L., & Bargawi, H. (2021). Hidden abodes in plain sight: The social reproduction of households and labor in the COVID-19 pandemic. *Feminist Economics, 27*(1–2), 271–287. https://doi.org/10.1080/13545701.2020.1854478

Tavory, I., & Timmermans, S. (2009). Two cases of ethnography: Grounded theory and the extended case method. *Ethnography, 10*(3), 243–263.

UN Women. (2019). *Progress of the world's Women 2019–2020: Families in a changing world*. United Nations.

Wee, V., & Sim, A. (2004). Transnational networks in female labour migration. In E. Ananta & A. Arrifin (Eds.), *International migration in Southeast Asia* (pp. 168–198). Institute of Southeast Asian Studies.

Weiss, T. G., & Wilkinson, R. (2014). Rethinking global governance? Complexity, authority, power, change. *International Studies Quarterly, 58*(1), 207–215. https://doi.org/10.1111/isqu.12082

Xiang, B., & Lindquist, J. (2014). Migration infrastructure. *International Migration Review, 48*(s1), S122–S148. https://doi.org/10.1111/imre.12141

Xiang, B., & Lindquist, J. (2018). Infrastructuralization: Evolving sociopolitical dynamics in labour migration from Asia. *Pacific Affairs, 91*(4), 759–773. https://doi.org/10.5509/2018914759

Yeates, N. (2004). Global care chains. *International Feminist Journal of Politics, 6*, 3.

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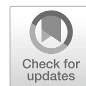
Chapter 2
Neoliberal Migration Governance: A Theoretical Framework



> …the concrete labour transformed into labour power, measured by time, put on the market and paid by wages, is not concrete labour; it is labour that has been cut off from its humanity, from all its qualitative variables…
>
> —Michel Foucault, The Birth of Biopolitics: Lectures at College de France 1978–1979

Much of the literature on migration governance focuses on states and policies, the relationships of many different actors (e.g. civil society, international organisations), legal and technical perspectives, and processes that take place at various scales (Arcarazo & Geddes, 2014; Kunz et al., 2011; Pecoud & Thiollet, 2023; Robinson, 2018; Rother, 2022). This chapter unpacks the concept "governance" in migration studies by reconceiving it as social relations of power among actors in everyday practices. This approach is in part inspired by the reconceptualization of power in global governance which critique "choice-theoretic" approaches that reduce world politics to global public management (Barnett & Duvall, 2005). Barnett and Duvall's typology of power specifies different ways in which power is exercised with different effects. Global governance, from this perspective, is not simply the interest-based cooperation of different actors working at various levels to solve problems posed by a globalising world.

The critique of the "neoliberal" aspect of governance is intended to question the implicit normative commitment to the ordering powers of the market, and indeed the purported neutrality of market decision-making (Hall & Biersteker, 2004, p. 214). This critique hopefully demonstrates contradictory, and sometimes even unambiguously harmful processes and outcomes. The empirical focus on everyday practices links actions across territorial jurisdictions, places, and households. This chapter details the logics of power and logics of action developed from Foucauldian genealogies. It builds on the call to rethink power in global governance as the production of effects through social relations. Making the analytical shift from the economic and legitimacy/accountability frame means inquiry is directed to concrete techniques of power in their varying modalities, rather than to properties of more and more actors and/or institutions contributing to global governance.

In economic sociology, the notion that migration be conceived as cross-border labour markets focuses on the relationship between sending and receiving countries in the "exchange of migrant labour". This approach opens up the black box of the

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market as "complex social interactions" (Shire, 2020, pp. 3–5). The analytical focus on labour markets also does not take for granted that what is being commodified, marketed and exchanged is labour power (Mense-Petermann, 2020).

The empirical case of private recruitment and employment agencies that deploy migrant domestic workers is interesting because the specific character of these industries, and the services they provide, developed due to the unique features of domestic work itself, and compounded by mobilities across sovereign territories. From the perspective of the economic sociology of labour markets, their business activities and relationships with each other, state apparatuses, non-governmental organisations, employers and workers themselves, are an interesting entry-point to understand the culture of this specific market. However in this literature, there is not much in-depth investigation of dynamics of power relations, even though they are mentioned in principle (Abolafia, 1998).

2.1 When Private Authority Is Market Authority

Global Governance was a vision of a new world order following the end of the Cold War. To govern was to craft a "system of rules" (Rosenau, 1992) and to manage global affairs in order to attain the good life in "our global neighbourhood" (UN Commission on Global Governance, 1995). In this emerging order, rule-makers included firms which cooperated to set standards and regulations in their industries. "Private authority" emerged as states cede control in the name of efficiency, and as private actors vied to exert more influence and power (Cutler et al., 1999; Kahler & Lake, 2003). This authority derives from the ideology of how market governance is taken for granted as good governance. At the same time, legal formalisms that only attribute authority to state entities make it difficult to open up this private authority to public scrutiny (Cutler, 2004, p. 24). These preclude the possibility of private actors contributing to "public bads" instead of public goods (Cafaggi, 2012).

Not coincidentally, the global governance discourse has coincided with neoliberal policy prescriptions that have rolled back the state in preference for "lean government," that is, minimal state intervention in market activities. In this schema, firms have taken up the provision of utilities and state-owned corporations have been sold to the private sector. States, bureaucratic agencies, private actors and other non-state groups now form "transgovernmental networks" in public and private partnerships to govern specific jurisdictions across different countries (Cerny, 2017). The drivers of this process are assumed to be "infrastructure built on liberal principles and the presence of diverse social forces (Coen & Pegram, 2015, p. 417)."

The literature on global migration governance also draws from the top-down, problem-solving ethos of the body of work from which it draws its analytical tools (Arcarazo & Geddes, 2014; Betts, 2011; Geiger & Pécoud, 2014; Koser, 2010; Kunz et al., 2011; Newland, 2010). From the perspective of states, migration is something to be managed (Hollifield, 2004; Hollifield et al., 2008), where states are

the final arbiter of who gets to come and stay. The literature on the migration industry, framed from the disciplines of sociology, anthropology and geography, has long documented its instrumental role in the facilitation of migration (Cranston, 2017; Findlay et al., 2013; Kern & Müller-Böker, 2015; Loveband, 2004; Samantroy, 2014; Schapendonk, 2017; Xiang & Lindquist, 2014).

Economic actors gain authority because they are able to reduce transaction costs or more efficiently perform regulatory tasks. Markets wield institutional or market authority given their capacity to set standards, or the normative acceptance of market-based decision-making. However, in these accounts private actors' legitimacy, expertise, and authority are all derived from their legal and licit activities. Hall and Biersteker do refer to groups who violate international norms such as mercenaries or transnational criminal organisations who exercise "illicit" authority by providing public goods to the populace in weak states (Hall & Biersteker, 2004). While recruiters in the migration industry may do outright illegal activities, the conduct of their business is not normally understood as a public service or a public good.[1] In the literature, they are generally not understood to contribute to public bads or social ills either.

While case studies of recruitment agencies that deploy domestic workers may describe exploitative, subordinating or commodifying practices in detail (Awumbila et al., 2018; Killias, 2009; Loveband, 2004), they are rather seen as convenient scapegoats when things go wrong, if not partners in migration governance. This "partnership" (Elias, 2017) takes place within the reconfigurations of the state form and governmental power. Public oversight over the doings of private companies is normally frowned upon because this may affect the bottom line. States may provide "steering" by way of general principles, and these policies are of course public knowledge. But the actual execution of said policies may be hidden by a "corporate veil" (Gammeltoft-Hansen, 2013, p. 141).

When market actors exercise "private authority", they are usually seen as improving problem-solving in complex governance systems (Green & Auld, 2017). When public harms result from these activities, it is because markets "fail" and public bads are "externalities" (Callon, 1998). In other words, the ordering or governing functions of market actors are understood in conventional approaches as value-free. For example, a Singapore employment agent once made a distinction between his "paymaster" and "loan type" clients. The former were employers who have paid him money up front for his services. At the core, this meant finding a domestic worker from overseas who met their demands (e.g. for childcare, elderly care and/or overall housework). The latter were workers whose payment were deducted from their future salary. Singapore law caps this deduction at two months' worth of salary in the duration of the worker's two-year contract.[2] This Singapore agent said that while he catered to two sets of clients, the paymasters' voice carried more weight. "It's

[1] Although there are recruiters who believe that what they are doing, apart from doing business, is in service of the country, workers and the greater good.

[2] In practice, deductions may exceed the 2 months' limit.

easier to earn from the weaker party than to earn from the stronger party." It was therefore much easier to accommodate the requests of employers than workers—for example, that the former might not wish for their employee to have a mobile phone, that they might want to limit their religious practice in the household, or expect body modifications (e.g. maintaining a short haircut). This concrete example of trying to reconcile what are clear conflicting interests between two types of clients is just one among many contradictions that these "middle men" of migration must carefully navigate.

Because domestic work is usually excluded from labour laws and regimes of social protection, this low-rights context, in combination with market governance, makes it difficult to exercise public oversight into the activities of PREAs. Migrant status also poses extra challenges as the domestic worker cannot exercise the rights of a citizen. Market governance presumes that private actors, in their exercise of market authority, are simply neutral actors guided by market logic. The case of migrant domestic work, because of its specific nature, makes it easier to see how market governance, like any other social order, may create, reproduce or reinforce inequalities and systems of domination.

To unpack what we mean by "market", it is useful to turn to how it is conceptualised in economic sociology. From this perspective, the market is not simply constituted by wills or an alignment of interests, but is held together by institutions, cultures, and practices in specific historical contexts (Aspers, 2009; Callon, 2021). There are buyers, sellers and commodities that are traded. Markets are "highly demanding arenas of social interaction" (Beckert, 2009, p. 245) in which coordination problems among many actors may be resolved. A market emerges when three elements are met: there are objects that are "singularised" (transformed into a categorised, calculable good), there are rules of exchange, and values are determined (expressed in prices) (Aspers, 2022). They may be described as "collective devices for the evaluation of goods" (Callon & Muniesa, 2005, p. 1245).

Given this background, it is useful to rethink of migration as cross-border labour markets (Shire, 2020). Doing so would make it possible to examine actors, rules and processes from the supply (sending country) and demand (receiving country) side. Transnational labour markets match workers and employers in networks that are embedded in multiple scales (Mense-Petermann, 2020). While humans themselves are not commodities in the formal sense of the word (i.e. not objects produced for sale), it can certainly be said that the service they offer, i.e. their labour power, may be commodified, and therefore sold at a price in a process of exchange. The thing exchanged is "the promise of temporary control over the use of labour power" (Shire, 2022, p. 122). In this sense, a labour market is a "system for hiring labour power" (Furåker, 2005, p. 17). One major "device" in this system is the employment contract—which sets limits to the conditions of hiring out. Without such limits, employment may devolve into forced labour or slavery.

In their activities as "merchants of labour" (Kuptsch, 2006; Martin, 2017), recruiters, training centres, medical examiners and insurers, along with state actors in migration bureaucracies in sending, receiving and even transit countries are key actors in the creation, maintenance and functioning of transnational labour markets. Unlike the literature in global governance, which draws from literature on regimes

and international relations, the analytical focus is not the assessment of authority or legitimacy. To acknowledge that private recruitment and employment agencies in the migration industry are "market makers" or "market organizers" (Mense-Petermann & Schwenken, 2022, p. 152) better contextualises their activities in political economy.

2.2 Power as Social Relations: A Foucauldian Analytics

The aim of the book is to unpack market governance as social relations of power, and to detail how the latter may be recognised in practice. In essence, this is making legible what would otherwise seem random or opaque processes. It is to demystify assumptions that markets are neutral allocators or distributors of value, and helps de-link the workings of the market, in this case of a very specific labour market, from "good governance" or "best practices". It helps explain outcomes that have empirically been demonstrated as detrimental to the lives of many domestic workers, not only in the country cases covered in this book, but also in newer migration corridors in other world regions.

As mentioned in the introductory chapter, Michel Foucault's theorisation of power and his genealogies of institutions in modern societies give fine-grained analytical tools that centre the logics and techniques of power. He developed this re-conception in critique of theories of power available in his time. Power is not a commodity or a substance to be acquired or accumulated, as posited by social contract theorists. For the latter, power is redistributed or shared in the transition from monarchic rule to popular democracy. That is, it is not simply an effect of the economy (Foucault, 1997, pp. 13–14). It is also not an effect of language, because language is a system governed by rules (Foucault, 1980, p. 114). For Foucault, power is rather a strategic opposition of forces that has no pre-determined rules. And it manifests when it is exercised, i.e. it does not "exist" in a steady state. These are the two main principles that have guided his investigations into the dynamics of power.

In his quest to understand it in its exercise, Foucault chose to move away from the power of the state to the "extremities" of society—i.e. the asylum, the hospital and prisons. He would return to the question of the state in the late 1970s, but in the early period his method was to look for power where it became less and less juridical—i.e. not a matter of law and sovereign rule. The method was to look for power where it was applied and to examine their effects.[3] The question was not which actors were powerful and why. The question was to see how power was exercised—that is, to examine techniques (Foucault, 1982, p. 786).

[3] To think of the political beyond the state meant attempting a "triple displacement to the outside", a method which meant moving away from the institution, away from functions to strategies and a de-essentialisation of objects. To refer to the sovereign (state), the task was to 'cut off the king's head' and the to figure out "how it is that this headless body often behave as if it indeed had a head" (Dean, 1994, p. 156).

If power were not concentrated in the sovereign state, it could be everywhere. This did not mean that everywhere was repression or domination. Rather, it meant that power relations were found in all aspects of society (Foucault, 1980, p. 142). This meant that there was no "outside" of power, that all were implicated in power relations (Foucault, 1982, p. 791). Crucially, here is where Foucault's conception of power differed from his contemporaries. Power was not simply negative, but also productive. It could enable and capacitate. While it repressed and concealed, it could also produce "reality" (Foucault, 1977, p. 194). Therefore power exists if techniques of power could be exercised. Power relations are "strategic games between liberties", where one tried to conduct the conduct of another. They are different from states of domination, where one had little room to manoeuvre. Between two extremes of a continuum, there are technologies of government (Foucault, 1988). These techniques are intentional, that is, they are actions that have an intended effect even though the agent performing them may not know the full implications of their actions (Dreyfus & Rabinow, 1982, p. 197).

In his later work, Foucault made clear that he wanted an "analytic of power", an instrument which would make it possible to analyse power relations in a problem space (Foucault, 1980, p. 198). This analytics is topological by nature, where varieties of power combine and recombine in a "system of correlation" (Foucault, 2007, p. 8), a "grid of analysis", (Foucault, 1980, p. 199) or "complex edifices". In a topology, heterogeneous elements remain distinct, composing a "social space" (Deleuze & Hand, 1988, p. 27).

Again to summarise, Foucault's conception of power is that it can be detected in its exercise. The decision to examine its application at the extremities of society brackets the state, meaning it allows a distinction of the exercise of power apart from the state's. Power is not like a substance that an agent "has" or possesses, but rather exist as techniques. These, in turn, are purposeful. They have logics or rationales. Power is not only negative—something which constrains or prohibits, but also productive—something that creates or enables. Lastly, there are different power forms which may be exercised by different sets of actors at the same time, in a site or problem space.

From Foucault's genealogies of power, I construct an analytics, which defines how different rationalities or logics will look like, in practice, and to distinguish them from each other. Here then it is possible to empirically demonstrate that different forms of power operate simultaneously. What binds this space is not necessarily physical territoriality but practices themselves. I have constructed this theoretical framework to make "visible" the social relations of power that would tie together various institutions, places, levels of analysis and actors. I propose to use this analytics to investigate the workings of the neoliberal migration governance of domestic worker mobility in Southeast Asia and to demonstrate how power relations works in practice.

The four power forms are Sovereignty, Discipline, Biopower and Governmentality. These are labels that Foucault himself has used in his body of work. I take the liberty of sharpening the differences among them, even though Foucault himself has not made such categorisation. The table below is a representation of the power forms, their logics and actions. I also include the end-goal of the exercise of each power form (Table 2.1).

Table 2.1 A grid of analysis

An analytics of power				
Power	Sovereignty	Discipline	Biopower	Governmentality
Logics	Personal, punitive Prohibitive/ reactive Makes die/lets live Visible, spectacular Dominion over territory Extractive (wealth, commodities)	Impersonal Productive/ proactive Panoptic Isotopic Extractive (labour power expressed in time)	Vitalpolitik Reproductive Makes live/lets die Regulative	Function of liberalism (freedom) Extractive (labour power expressed in creativity, affects) Pastoral Function of competition Deregulation
Actions	Law-making and enforcement Production of identity Capital punishment Bordering Taxation	Observation of target populations Records-keeping Examination Training the body machine Reorganisation of space Reorganisation of time Classification	Reproduction of a vital population Calibration of population dynamics Categorisation of viable groups Regulation of sexuality	Production and consumption of freedom (Re)production of homo economicus Investing in humans as capital Market-making Fostering competition Intervening at the level of the social
Target	Subjects—Anonymous, amorphous whole	Bodies as individuals Bodies as a mass	Bodies as species being, as a population	Subjects—Specific, known, knowing
Outcome	Obedience/ compliance to the law	Docile bodies Practised bodies	Biopolitical subjects Healthy population	Entrepreneurial subjects

2.2.1 *Sovereignty: Power in Juridical Form*

Foucault's critique of state power is rooted in his attempts to historicise "sovereignty" as a specific kind of power that emerged from a particular context. Sovereign power is the power of the monarch, and born of the feudal relations in the European context. It takes its form through the creation and exercise of the law which primarily prohibits or forbids. The Western juridical system is all about the king—his rights and his power and how it should be deployed or limited. As a cultural product of its time, it was useful to describe the mechanics of feudal monarchies and democratic impulses. The latter eventually wrested power from the king who rules by divine right to a sovereign people (Foucault, 1980, pp. 102–103).

But in modern societies this power could not be the only kind at work. A power that prohibits and prevents rather than allows productive forces to work, and a power that deducts and imposes a compulsory transfer of wealth (taxes), has its roots in

feudal times, and is inadequate to the analysis of the contemporary period (Foucault, 2003, pp. 50–51). Nevertheless, sovereignty's historical legacy casts a long shadow as there is, as yet, no higher order of government above the nation-state. The state form as we know it has expanded beyond European borders due to colonialism. Sovereignty is still the core principle of the inter-state system. Today, juridical mechanisms also operate in international treaties, intergovernmental institutions and international organisations. The point to make is that these mechanisms are not the only form of power in global social spaces.

Below I draw on logics of sovereignty (state power) from Foucault's genealogies. And from there, develop actions (techniques) with which we may "detect" sovereign power in its exercise (Table 2.2).

Table 2.2 Sovereign logics and actions

Sovereignty	
Logics	Actions
Personal, punitive. All infractions are crimes against the sovereign. Punishment is a way to recoup what the state has lost—the monopoly of the use of force.	**Law-making and enforcement.** The core of the sovereign's power is legislation—the creation and enforcement of the law or what Foucault calls juridical power. Juridical mechanisms prohibit or allow (a binary division).
Prohibitive/reactive. Sovereign power is a negative power. It is exercised in prohibition of an act. It is reactive in that is exercised after an action has already been committed.	
Makes die/lets live. States have an absolute power over who lives and who dies in its territorial jurisdiction (i.e. capital punishment). Sovereign power can only take like, not create it.	**Production of identity (inclusion/exclusion).** The law determines who is a sovereign subject or a citizen and who is a foreigner, and from these emanate duties and privileges as well as a range of actions that are permitted or prohibited. **Capital punishment**. The sovereign has a right to the lives of his subjects insofar as they constitute a threat to its own being. This is the right of seizure (of life). Its inverse is the sovereign's power to pardon and let live.
Visible, spectacular. Sovereign power does not set upon the bodies of its subjects except during the time of these ceremonial rituals (e.g. an execution, oaths of fealty) and when a citizen breaks the law.	
Dominion over territory. The line which divides the inclusion/exclusion principle is the territory where the sovereign has absolute dominion.	**Bordering over territory.** Sovereign power circumscribes sovereign space, which divides domestic/national and foreign/international jurisdiction.
Extractive. Sovereign power is the power to extract resources. It is a relationship of asymmetry—of levy on one side and an expenditure on the other.	**Taxation.** Taxation is the way by which the sovereign takes from its subject in order to sustain itself.

The boundaries between what practices and which persons are "legal" and "illegal" are surprisingly porous in the restrictive political cultures of Singapore and Malaysia. The law is enforced, that is, it prohibits action, except when it does not. For example, when I asked a Singapore agent, Amina Abdullah, how she sourced the workers she deployed to local households, she was rather straight-forward in describing what would have been disallowed by Singapore and Indonesia's regulations. She bypassed the need for a partner agency in Indonesia to keep costs low. She did not want to work with them because they were "just there to make money." Rather, she worked with referrals, through her own networks of previously placed maids, their friends, and even family members. "I'll get their husbands or uncles to be sponsors.[4] So that way, I can do without agents. This will lower the price." This meant that the total migration cost was lower, as she would be the only intermediary to pay. This also meant that the Indonesian worker left without having been registered in the Indonesian migration bureaucracy. This would have repercussions, for example if the worker needed assistance from the Indonesian embassy. In recent years, the Indonesian state has also started prosecuting Indonesian recruiters for actions that fall within the legal definition of human trafficking. These actions include falsifying their identity documents to make them appear older in order to meet the Singapore minimum age requirement (Palmer, 2020). In this brute sense, legislation may limit or expand how much money could be made.

Overall, the regulatory environment is incredibly complex, as it involves multiple jurisdictions, bureaucracies, and actors who are competing to shape what may even be contradictory outcomes. The clearest example is between the Singapore policy to allow Singapore agencies to charge two months' worth of the worker's salary as a fee for a two-year contract, and the Philippines' policy that the worker should not be charged recruitment fees at all (by the Philippine agent). Philippine jurisdiction ends as soon as the worker is deployed, and so the worker is charged by her agent in Singapore. The worst case scenario is when the two agencies collude—and the worker is charged more than two months, so that the agencies may share in their profit. And so while sovereign entities—i.e. the state bureaucracies—exercised sovereignty over mutually-exclusive territorial jurisdictions, agencies could circumvent rules in the legal vacuums created by the lack of inter-state regulation, on the one hand, and the exclusion of domestic work from labour legislation in the host countries, on the other.

While Amina Abdullah could bypass certain rules, there were others where her compliance was unavoidable, mostly to do with governing her corporate entity. She complained of having to attend courses[5] in order to gain her license to operate. She found that only 25 percent of them were useful. There were other regulations that

[4] Informal broker.

[5] Singapore employment agencies need to attend courses to gain their Certificate of Employment Intermediaries. These courses give information about rules and regulations governing employment agencies (EAs), and last for 40 hours.

she thought were not useful, and even a total waste of money. "The English test[6]? I was not for it. I had a maid that failed twenty-one times. She paid each time. And when they fail, they have to go back."

2.2.2 *Discipline: Power of the Norm and the Sciences*

Building on his critique of sovereignty as insufficient to examine power relations, Foucault looked at emerging forms of power in modernising societies. In the seventeenth to eighteenth centuries, he identified one which extracted time and labour rather than commodities and wealth from subjects. This new type of power was the condition of possibility for industrial capitalism. The bourgeois revolution not only sought to depose the monarch's power but also installed techniques of power called "disciplines" (Foucault, 2003, p. 88). "Disciplinary power" first made its appearance in his 1973–1974 lectures, where he demonstrated how psychiatry emerged as a branch of knowledge. The sovereign power of King George III, who was diagnosed as insane, was checked by his own doctors and their medical authority.

Instead of extracting levy or taxes, discipline extracted labour power not only through sovereign coercion or ideological domination but through the manipulation of the physical body through practices and scientific knowledge. Foucault found disciplinary power not only in factories, but also in barracks, schools and prisons. He called these practices of manipulating bodies a "micro-physics" of power (Foucault, 1977, p. 26). In a factory setting, for example, juridical power could prohibit certain behaviours such as theft. It could penalise non-work or strikes. But it could not make a worker more productive. Disciplinary power was also a critique of the Marxian notion of ideology working to coerce indirectly, at the level of consciousness, precisely because it worked on the body in its materiality.

While the idea of territory in sovereign power was an undifferentiated space, discipline organised spaces modelled after Jeremy Bentham's panopticon.[7] Bentham meant for his architectural model to be applied not only to prisons but in other institutions where there was a need to keep subjects under inspection. The Panopticon showed a use and designation of space which physically held the body immobile for observation. The overall person in charge could be anyone, and what designated disciplinary power was the office and its function. Where sovereignty was embodied in the monarch's person, discipline was de-personalised.

[6] The English test as condition for employment was introduced in 2005 but was scrapped in 2012.

[7] Foucault stumbled on the Panopticon in his research on the institutionalization of the medical gaze in military schools (Foucault, 1980, p. 147). He perhaps took his cue from the full title of Bentham's 1791 work "Panopticon; or the Inspection-House: Containing the Idea of a New Principle of Construction Applicable to Any Sort of Establishment, in which Persons of any Description are to be Kept Under Inspection; and in Particular to Penitentiary Houses, Persons, Houses of Industry, Work-Houses, Poor-Houses, Lazarettos, Manufactories, Hospitals, Mad-houses, and Schools".

Unlike sovereignty, which is only activated in points of contact (i.e. summary executions, encounters with law enforcement), discipline is applied continuously. It entails procedures of more or less continuous control, even on those who have not committed a crime. What guarantees its perpetual functioning is "exercise", training that is recorded to monitor progress or growth. Records-keeping then became an important tool in disciplinary power. It made it possible to compare and contrast subjects with one another. This would give way to the *isotopic* character of disciplinary power.

After immobilising, individuating and isolating individuals, they are then made to occupy a space, a locus, in a series ordered by some sort of rank or hierarchy. This series made it possible to place human capacities and behaviour in a normal curve, producing "abnormal" outliers. This is why those who have been judged "mad" are sent to the mad house, not the jail house. Juridical power can only declare one a criminal. Disciplinary power does not require law enforcers to guide behaviour, but rather does so through the power of the norm. Subjects may identify and monitor themselves as conforming to the more or less average mean, from more or less normal (Foucault, 2003, p. 16). In this way, disciplinary power is not only exercised on the materiality of the body, but on the internality of consciousness.

At the end of training and evaluation of performance, subjects of discipline are compared to a standard mean. The examination is a combination of hierarchical observation and normalising judgment. It renders subjects as objects of knowledge whose capacities and weaknesses are made known to examiners. It renders them comparable to others and ranked accordingly. The examination also produces written documents with which to track the progress or regress of individuals, allowing for points of intervention and correction, or outright expulsion (Foucault, 1977, pp. 184–192).

Finally, sovereign power works on bodies as wholes—killing them or letting them live. Discipline works on parts of the body, in effect remaking them to fit in cogs of an industrial machinery. There are two processes in effect—the increase of forces working on the body expressed in economic utility and the decrease of forces in terms of political resistance. The bodies which would man industrial Europe's factories are made docile (Foucault, 1977, pp. 141–149).

Discipline worked to create a field by which individuals are monitored, classed and induced to perform activities, repeatedly if need be, to achieve normal conduct. It is therefore not strictly repressive in that it does not prohibit as do laws or juridical power. Through its system of punishment and reward, merit and demerits, discipline produces and creates.

The physical and metaphorical placement and ordering of individuals do not simply render them objects of knowledge but also knowing subjects able to reflect on their own condition. Subjected to disciplinary power, they come to know themselves as soldiers, students and workers who must strive to conform to the standard. Through scientific examination, they come to know about the truth of their capacities, thus prompting a need for improvement and the upgrading of proficiencies. The disciplined individual, unlike the sovereign subject, will perform as needed not because juridical power instructs her to do so, and not even out of fear of being sent to jail. She will comply instead to the rule of the norm, not the rule of the law (Table 2.3).

Table 2.3 Disciplinary logics and actions

Discipline	
Logics	Actions
Impersonal. What exerts control and shapes behaviour is not the coercive power of the sovereign's threat of force, but the gaze of the observing authority.	**Observation of target populations**. Subjects are placed in such a way as to make each observable, comparable to others' performance and therefore classifiable (according to some isotopic criteria, e.g. speed, skill, age etc.). **Records-keeping**. For the purpose of making sure that everyone keeps as close to the standard or the norm, an accounting of behaviours (good and bad) must be done. Documentation is proof of the individual's abilities and inabilities, and shows where he or she can be improved upon. **Examination**. The examination exemplifies a system of rewards and punishments through evaluation. This rite of passage declares the examinee as having reached a minimum requirement. The examinee is judged to have the abilities and exhibit properties to be identified as belonging to a category.
Productive/proactive. Making a body productive entails firstly constituting it as labour power. This is a process of subjecting the body to productive forces, as when it is inserted as part of the machinery in a factory. Sovereign power is only triggered when an offence has been committed. In this way it is reactive. Discipline anticipates action. The power of the norm is applied even though a person has not incurred an infraction.	**Training the body machine**. Discipline modifies behaviour through infinitesimal corrections. This can be done through the repeated performance of exercises and activities until the body is habituated to their performance.
Panoptic. Space is no longer treated as undifferentiated—as in sovereign power. Space is divided into small units. This signalled a shift from control over territory to control over inhabitants. The prison model indicates the capture and immobilisation of individual bodies for the purpose of observation, monitoring and records-keeping.	**Reorganisation of space**. In order to capture bodily forces, disciplinary power must first make bodies immobile. This isolating technique individualises a population, rendering each single person visible to authorities. The physical layout of a space is to make sure that the individuals and machineries occupying it are integrated and linked so as to make production orderly and efficient. Enclosure, partitioning, functional sites and ranks—these techniques combined order physical space. **Reorganisation of time.** Just as physical space is partitioned, so too are units of time. Activities performed within these units had to ensure their utility, that time was used wisely—quality time. The time-table or schedule divides productive and non-productive time and activities.

(continued)

Table 2.3 (continued)

Discipline	
Logics	Actions
Isotopic. This entails the classification and location of an individual within a series which expresses a rank or hierarchy. Discipline establishes a norm to which individuals must strive to conform. The norm is what shapes behaviour, not the law (as in sovereignty).	**Classification and placement in ranks/series**. Based on the isotopic curve, individuals can be grouped and ranked according to a set standard. Unlike sovereign power which treats its subjects as either law-abiding or law-breaking, discipline has the capacity to create various groups to be dealt with accordingly and for whatever purpose.
Extractive. Sovereign power extracts wealth from subjects through taxation. Discipline, on the other hand, extracts labour power. The idea is to capture forces of the body and to mobilise them for productive purposes. The body is manipulated through practices and scientific knowledge.	

The three training centres I was able to visit in Indonesia were located in a Jakarta suburb, an hour away from the heart of the capital. Unlike the Manila training centres, these were more restricted spaces—entry and exit were regulated by high walls, locks, gates and security guards. The smallest, PT Fatima,[8] deployed workers to the Middle East. When I visited, there were twenty students bound for Abu Dhabi. PT Fatima could house forty at a time, at maximum. It was operated by a recruitment agency. Students followed a daily schedule that began at 4:30 AM and ended at 4:00 PM. After waking, students prayed, prepared and ate their breakfast, and began classes at 9:00 AM. They had their lunchbreak at noon, and resumed classes from 2:00 to 4:00 PM. Morning classes were devoted to "*teori*"—which was mainly an Arabic language class. Afternoon classes were for "*praktek*"—skills that included making up the bed, laundry and washing, table-setting and babysitting.

On my second visit, I was allowed to sit in the Arabic class. Ibu Annie, the instructor, started the class by saying:

> (Interpreted from Bahasa) Practice is not just saying once but repeating again and again, before the test, because you forget easily. So to remember, you have to keep on repeating it. What you have studied, you have to practice it again and again. Like I asked you, one by one, what kind of equipment is in the kitchen, the electronic gadgets? It is important for you to study because in your employer's house this is the electronic gadget you're going to use.

The day before, Ibu Annie had said language was the most difficult part of training. Often, students failed this part of the exam. Ibu Annie asked those who had not been to the Middle East before to sit in front. She said some words aloud—water, tea, coffee, fruits. Students screamed back the words in Arabic. They had memorised the words. They then enumerated parts of the house—door, window, wall, floor. Finally, the vocabulary exercise shifted to family members, places in the neighbourhood, and temporal words. Students began writing numbers in their notebooks. Ibu Annie checked their work. She interspersed language and vocabulary exercises with

[8] Not its real name.

nuggets of advice. Discipline is success. It is important to help each other. Be grateful and patient. Be polite and caring. Do not be dominant and act like you are smarter. We have to be like a family here.

Trainees bound for the Middle East were considered to be the worst of the lot. They were generally less educated, "less attractive" (i.e. darker-skinned), more "stupid" compared to recruits bound for the Asia Pacific. This may indicate how the Middle East markets expected less from their domestic workers. The standards of the receiving country's migration regime could also be an indicator of what kinds of workers were allowed to be deployed to households.

A brief interview of two students in PT Fatima revealed that neither knew the names of their agencies, only the names of their *calo* or sponsor. Neither recounted having been asked many questions during the recruitment period. And nobody among their batch was rejected. This meant that the *calo* was not being particularly selective. This was perhaps inevitable, when sponsors were not directly hired by agencies and got paid by commission based on how many "bodies" they are able to deliver to the agency in Jakarta.

The training centres I visited in the Philippines and Indonesia were all organised like schools. There were classes, teachers, and assessment. Students learned how to cook, clean and care for dependents in prospective host families. But perhaps more importantly, they learned what it meant to be a domestic worker.

2.2.3 Biopower: Power Over Life

In the second half of the nineteenth century, a different kind of power came to complement disciplinary power. Whereas the latter worked on individual bodies, this new power worked on bodies as a global mass of living beings who are born, die and fall sick (Foucault, 1978, p. 139). While discipline treated the body as a machine, the other looked at the body as a species body. Unlike sovereignty which was exercised in taking life, biopower was exercised in its efflorescence, its vitality. After having discovered man-as-species as an object of knowledge, the disciplines could then work to collect statistical data on birth rates, mortality rates, migration, etc. and then act to intervene with policies to increase or decrease them. While discipline works on the surveillance and maximisation of productivity of each individual as a unit of utility, biopolitics deals with the regulation of the population. A whole host of regulatory mechanisms were introduced to encourage households to save, the setting up health insurance schemes and pensions. Other mechanisms worked at the level of reproduction—on sexuality, childcare and education (Foucault, 1997, pp. 250–251).

The other half of biopower was the function to "let die". Making live, and letting die are intimately linked with the other. Racism, for Foucault, was a way to separate sections of the population from each other, groups of people defined by biological make-up. It is a way to allow groups of people to die without having them executed. The rationale or justification of their neglect and death is that they pose a threat to the health and purity of the rest of the population (Foucault, 1997, pp. 254–255).

Sexuality became an effect of power relations, the product of a whole host of technologies which targeted bodies and understandings of what constituted sex. The end

of the deployment of these strategies was the social reproduction of a strong, vigorous population. While disciplinary power guaranteed a permanent surveillance of the body and guarded against abnormal sexualities and deviant behaviour, biopower reproduced a population from superior genetic combinations. This was why the nuclear family was enshrined as the basic unit of society, its configuration of sexuality, and its division of sexual labour, eventually diffusing to the rest of the social body.

Biopower is an extended account of human behaviour although it does not work at the micro level (as discipline) but rather on a much larger scope. It does not modify individuals but intervenes at the level of the population as a biological construct. As it attempts to secure life, it tries to cancel out threats posed by disease, degeneration, retardation, miscegenation and the like. So on the one hand, you have the "anatomo-politics" of the human body seeking to integrate individuals into body-machine complexes (discipline) and on the other you have regulatory mechanisms which manipulate the population's qualitative composition, lifespan, death rates and health (Table 2.4).

Table 2.4 Biopolitical logics and actions

Biopower	
Logics	Actions
Vitalpolitik. This is the politics aimed at maximising the quality of life of a population—tending to its health, longevity and productivity.	**Reproduction of a vital population.** These techniques aim to target the quality of life of a population which relates to their social reproduction. From the quality of water, modern medicine, public hygiene, housing, work-life balance and social security, among others.
Reproductive. The creation of viable individuals as a member of productive population means intervening at the level of reproduction. Mechanisms are deployed which determine what kinds of human beings are allowed or disallowed to exist.	**Calibration of population dynamics**. These have to do with making population growth forecasts and/or pegging them to economic growth forecasts. Techniques seek to regulate birth rates, morbidity and immigration. The end goal is "make live" or create a healthy, genetically desirable and productive population with would form the base of the strength of the nation.
Makes live/lets die. Racism as a function of power determines who lives and who dies according to some criteria. The dividing principle is not between citizens and foreigners (as in sovereignty) or individuals placed in an isotopic scale of normality (as in discipline) but lives that are biopolitically more or less valuable, more or less worthless. This is a precursor to the "capitalised" and invested bodies of the last power form, governmentality.	**Categorisation of viable groups**. Along with disciplinary and sovereign techniques, biopolitical techniques operate to distinguish between which lives are deemed optimal to the needs of the state, and which ones must be executed or put away (criminals), rehabilitated (delinquents/deviants), or allowed to perish (sub-optimal or inferior groups). At this stage, however, the rationale for determining the valuable and the worthless relate to the strength or weakness of their biological make-up. This determination is not necessarily scientific but can be rooted in racist ideologies (which may or may not be disguised as "science").
Regulative. While specific institutions (e.g. schools, factories, prisons) capture and shape productive bodies of individuals, the state and its machinery comes to regulate the population as a whole through broad regulatory mechanisms that aim to control its vitality.	**Regulation of sexuality**. The state implements mechanisms to sanction which kinds of sexualities are deemed normal (and therefore healthy and acceptable), and which ones are not. These mechanisms can be as simple as giving housing subsidies to a heterosexual couple or making homosexuality illegal.

I attended a pre-departure orientation seminar (PDOS) conducted by a non-governmental organization (NGO) in Manila. The Philippine PDOS was previously only given by the government, but may now also be given by recruitment agencies and NGOs. This NGO's director, Emily Suarez, said that a worker's health was their "primary investment", and to put themselves first before others. "If your child needs a computer and you're sick – spend your money on yourself first."

The PDOS session began with a video that re-enacted what might occur during their deployment overseas—sexual abuse by the male employer, not being given enough food, and physical mistreatment. There were eleven attendees in this session, five were women, and the others were men. The PDOS instructor stopped the video before it was finished, and the formal session began. A slight woman who looked to be in her thirties, said she had been a former Overseas Filipino Worker (OFW). While the opening video was quite sombre, the instructor kept the tone light, frequently making humours jokes and asides. Repeating what the director had said, "Your health is your investment. Once you clear the medical exam, this means you are 'fit to work'. When you come back home, make sure you are still fit to work. You cannot come back with this…" She then wrote STD and STI on the white board.

All the PDOS sessions I attended, including the ones that were conducted by agencies, emphasized the importance of workers caring for their bodies, and that their health was an "investment". They all emphasised the risk of contracting sexually transmitted diseases, including HIV-AIDS. One agency went so far as to show photos of infected body parts—an infected mouth, tongue, penises, vaginas, and fingers. The speaker, a registered nurse, said that there were only nine countries where reported cases of HIV infections were on the increase. The list included the Philippines. Women, she said, were nine times more likely to contract HIV than men.

The instructors of the Indonesian version of PDOS, the *Pembekalan Akhir Pemberangkatan*[9] (PAP), were likewise candid about the risks of STDs, and what infidelity entailed. The PAP sessions I attended were conducted by government officials from the BP3TKI.[10] "Men who cheat on wives have less consequence than women who cheat on their husbands. So be careful, the stigma is quite bad." One instructor cautioned women on the pitfalls of prostitution. He said not to run away from the employer's household, as those often become prostitutes or escorts. There are a lot of "temptations", especially when one gets homesick or lonely. "Maintain your woman's dignity, and your husband's."

Apart from the medical examination that would declare a prospective worker "fit to work", migrant domestic workers in Malaysia and Singapore are required to undergo biannual medical exams to test for pregnancy. A positive result is grounds

[9] Final departure briefing.

[10] Indonesian Migrant Worker Placement and Protection Service Centre.

for the termination of the employment contract and subsequent repatriation. A domestic worker's body is required to be fit and productive, but not "reproductive". It must be free from disease, so as not to compromise the health of her host family, a proxy for the purity of the host nation. To prevent possible pregnancy, whether from illicit relations with males within the household, or with males met during days off, domestic worker sexuality is heavily policed. The biopolitical rationale of maintaining the health and purity of the nation creates incentives to "desexualise" the worker (i.e. control her appearance, what she wears, her hair length), and to restrict her physical mobility (whether she gets a day off), and access to social relationships.

2.2.4 Governmentality: Power of Government as Conduct of Conduct

It was the emergence of the problem of the population and the economy that made it possible to think of "government" in terms that do not exclusively deal with the law or juridical power. The "population" linked the household with the general economy. Indeed, the population became the end and instrument of government, its subject and object. Unlike juridical power which made clear distinctions between the affairs of the state and other domains of life, one "governed" a "household, souls, children, a province, a convent, a religious order, and a family" (Foucault, 2007, p. 93). In other words, Foucault offered a genealogy of the idea of "government" (*gouvernement*) as something that was practiced at the micro-level before it became associated with the activities of the state.

To govern well with sovereign power was to control the territory, to preside in dominion. To govern in this new sense was to apply economy to the objects and people within it and how they related to each other to achieve some end. In the old formulation, the "end" was the common good or the salvation of all citizens. In this new configuration, there was a plurality of ends, and government needed to arrange things and people to achieve them. A good sovereign was one who would have knowledge to dispose of things properly, economically (Foucault, 2007, pp. 98–99). Pastoral power, the relationship between the shepherd and its flock, is a concept derived from the Jewish tradition. Pastoral power is exercised on the multiplicity, not the territory (Foucault, 2007, pp. 121–127).

Unlike biopower, intervention was not levelled at the population's biological make-up, but rather on setting up an environment where certain actions could be more likely performed. Utilitarian theorists like Bentham, and later Quesnay, conceived of humans as motivated by desires and interests, the wellspring of action. Individuals motivated by pursuit of desires and interests were amenable to governmental techniques. In governmentality, Foucault offers a more refined modality of power which allows for and even encourages freedom. Unlike

sovereignty, discipline, and biopower, governmentality specifically allows, permits and enables individuals to fulfil their interests. To govern this population means answering their desires rather than blocking them. The trick to achieving government's targeted outcome is not only to create a hospitable, vital, productive environment (as in biopower) but to create self-directing subjects (Foucault, 1982).

Throughout the nineteenth century, political economists (Adam Smith, John Lock, etc.) fashioned a scientific rationality for good government. The state must economise—it must be frugal. Economic theory solved this problem of frugality and of whether government was doing something useful or not. And the market—the virtual space of exchange, made this determination and government could take action accordingly. In sovereign power, law was about legitimising rule. In governmentality, it was about allowing markets to function (Foucault, 2007, pp. 32–46). In eighteenth century thinking, the market was not known to have any defects, while the state was intrinsically defective or corruptible. Germany's Ordoliberals in the 1920s and critics of Franklin Roosevelt's New Deal in the 1930s, pushed this logic further to make the free market the "organising and regulating principle of the state" (Foucault, 2008, p. 116).

Later American neoliberals, notably economist Gary Becker, critiqued classical liberalism for failing to conceptualise labour in terms other than the quantitative variable of time. Surplus value is produced by simply showing up at the factory and staying there for however many hours. Neoliberals would re-conceptualise labour as "human capital", capital being what could be a source of future income (Foucault, 2008, pp. 219–230). As in classical liberalism, this subject is *homo economicus* (economic man), an individual motivated by interest, and is therefore "governmentalisable". While European neoliberalism is characterised by vigilant intervention, American neoliberalism is about the development of human capital (Terranova, 2009).

To conclude, Thomas Lemke points to two theoretical advantages of governmentality. Firstly, the public and private divide becomes an object of study—there is no innate division between the state and civil society. Secondly, government becomes a continuum from the level of the state apparatus all the way to the individual (Lemke, 2001, p. 201). This allows us to problematise spaces and social relations which were not conventionally thought of as political in the formal sense.

The emergence of the population as a political subject required the development of "government" as a political power rather than rule or reign. This prompted Foucault's return to what he had bracketed in his early investigations—the state. He unpacked the state as a historical construct, a modern governmental reason that traced its origins in practices of government found in the church, and eventually, in lay institutions. The precursor of the modern *raison d'état* or state rationality is the Christian pastorate. From its origins, government was the shepherd guiding its flock (Table 2.5).

Table 2.5 Governmental logics and actions

Governmentality	
Logics	Actions
Function of liberalism. The core rationality of liberalism is to guarantee circulations of commodities, producers, consumers and capital. It must maximise the circuit of goods and at the same time minimise the circuit of 'bads.'	**Production and consumption of freedom and risk**. Freedom is the relation between governors and the governed. Liberal government must ensure a specifically economic freedom to labour, exchange, produce and consume. Individuals must be free to pursue their interests. Freedom's twin is danger. To be properly entrepreneurial means taking risks, exposing oneself to risks. Risk can be produced by reducing welfare.
Extractive. While sovereignty extracts wealth in terms of tribute (taxes), and discipline extracts labour power, governmentality produces value by transforming the worker into a unit of human capital.	**(Re)producing homo economicus**. Homo economicus is the ideal participant of the market. This a self-disciplining, self-policing and self-training individual who continually tries to improve herself in order to increase her value, i.e. her capital. Homo economicus are amenable to government by the regulation of their interests. **Investing in humans as capital**. Workers are made more valuable and are "capitalised" through investments in health, education, training and the like. Economic growth rests in the "intensification of human capital (Tribe, 2009: 692)" rather than an accumulation of physical capital or merely increasing the number of workers.
Pastoral. Government from a distance means guiding and shaping the "conduct of conduct" of the governed who, as a result, internalise subjectivity and govern themselves accordingly. This subject is governed by freedom and choices.	**Market-making**. The market is the ideal space of governing. This society must be engineered. It does not naturally arise (as classical liberalism conceives), but must be created and constantly tended.
Function of competition. The engine of growth in advanced capitalism is no longer simply exchange but competition. Economic subjects—from individuals, firms, and states, must compete to produce goods and services through the most efficient means.	**Fostering competition**. The law has to block anti-competitive mechanisms which society can spawn. Policies of intervention must universalise the entrepreneurial form. It must generate social relations modelled on supply, demand and competition.
Deregulative. Private enterprise takes over the "ministerial" or steering role of government. If the ideal society is expected to embody market relations, then government must step back and let market forces direct as much of human activity as it can, as the economic colonises the previously non-economic.	**Intervening at the level of the social.** Neoliberal governance means that society ought to be governed as the economy, indeed for society to become the economy. To create the optimal neoliberal subject entails a social environment in which this subject may be created, directed and managed. Government must be light on economic processes, but heavy on the regulation of social processes. The fundamental social policy is economic growth.

Mr. Usman represented the interests of employers of domestic workers in Malaysia. I met him in Kuala Lumpur at a moment when the governments of Malaysia and Indonesia were renegotiating the terms of the Memorandum of Understanding (MOU) on migrant domestic workers, which expired in 2011. His organisation had sent a proposal to major stakeholders, including Malaysia's human resources ministry, the women, family and community development ministry, the ambassador to Indonesia, one of the large recruitment agency associations in Indonesia, and the Indonesian embassy's labour attaché. His members had complaints about the system by which employers could "procure" migrant domestic workers from Indonesia, the largest source country. One was about the lack of transparency on pricing, i.e. how much money PREAs charge employers. "The price lately is 16,000 RM.[11] It is almost four times what we agreed on in the latest MOU with Indonesia. The market is really haywire." The demand was so great, that there were fly-by-night operations that disappeared as soon as a down payment was made. "People are desperate. They even pick up maids that came through illegal entry. Maids who are not of sound mind." If the cost of procurement had been finalised by the Malaysian government with Indonesia, they would be charging the official price of 4,511 RM through proper agencies, "with proper responsibilities".

Another problem was that Malaysia was competing with other destination countries who also recruited from Indonesia. Apart from the relatively lower pay compared to Singapore or Hong Kong, there were also cases of abuse that made it unattractive to workers who knew enough to be "choosy". Certainly, one of the big-volume agencies I had encountered in Indonesia ranked Malaysia as the least desirable "export market", after Taiwan, Hong Kong, and Singapore. Mr. Usman was not confident that Cambodia's deployment ban would be lifted any time soon. "Abuse cases happen when employers cannot afford it. They don't pay. They don't give proper treatment. So this is why we are concerned with the income bracket of households. It should be reviewed."

For Mr. Usman and the "end-users" whose interests he represented, price transparency was crucial in coordinating the entire process, from the moment demand was generated in a household in Kuala Lumpur, to the "release" of the prospective worker from a household in Java. What were the costs of producing her passport? The board and lodging during training? The medical examination? The PREAs' service? For his organisation, these costs were rather arbitrary, and employers were left to the demands of PREAs who could unilaterally dictate prices. For Mr. Usman, the stabilisation of the "cost structure" for maid procurement depended on "letting the market forces determine the fair price". And this price could only be determined if only his interlocutors, those to whom he sent his organisation's proposal, could cooperate to stabilise the market. This would ensure that only "quality maids" could cross the border, heading off the possibility of yet another deployment ban, should another worker die at the hands of her employer. In this concrete sense, Mr. Usman was calling upon many different actors in Malaysia and Indonesia to make costs in

[11] Malaysian Ringgit.

the supply chain transparent. Far from the caricature of markets being "free", as if they spontaneously organised themselves through price signals, this market required strategic intervention.

2.3 A Grid of Analysis

This theoretical framework aims to specify the logics and actions in the exercise of power. Foucault's methodology demands its constant decentring, not its subsumption to a totality. This entails an understanding of power that is heterogeneous. This grid of analysis is useful to "see" social relations of power, and in what ways various actors may exercise them. It can link different sites and spheres—from villages in rural areas to households in capital cities. This grid allows us to understand that neoliberal migration governance, or market governance, does not entail the withdrawal of state power (sovereignty), but rather its reconfiguration. Market governance necessarily entails "partnerships" with all kinds of actors—businesses and civil society. State directives and legislation are rather geared towards crafting a space where entrepreneurial actions may take place. Neoliberal governance requires the "consent" of its participants who are motivated by desires and interests (i.e. are not simply docile). This does not preclude the possibility of domination (sovereignty) and exploitation (discipline). This also does not assume that interested individuals are simply freely pursuing their desires in the smooth frictionless space of labour markets. Biopolitical distinctions matter (citizenship, gender, race). And legal and territorial jurisdictions matter (borders).

References

Abolafia, M. Y. (1998). Markets as cultures: An ethnographic approach. *The Sociological Review, 46*(1_suppl), 69–85. https://doi.org/10.1111/j.1467-954X.1998.tb03470.x

Arcarazo, D. A., & Geddes, A. (2014). Transnational diffusion or different models? Regional approaches to migration governance in the European Union and Mercosur. *European Journal of Migration and Law, 16*(1), 19–44. https://doi.org/10.1163/15718166-00002047

Aspers, P. (2009). *How are markets made*? MPIfG Working Paer 09/2

Aspers, P. (2022). What is unique about labor markets? In *In search of the global labor market* (pp. 106–118). Brill.

Awumbila, M., Deshingkar, P., Kandilige, L., Teye, J. K., & Setrana, M. (2018). Please, thank you and sorry—Brokering migration and constructing identities for domestic work in Ghana. *Journal of Ethnic and Migration Studies, 0*(0), 1–17. https://doi.org/10.1080/1369183X.2018.1528097

Barnett, M., & Duvall, R. (2005). *Power in global governance*. Cambridge University Press.

Beckert, J. (2009). The social order of markets. *Theory and Society, 38*(3), 245–269. https://doi.org/10.1007/s11186-008-9082-0

Betts, A. (2011). *Global migration governance*. Oxford University Press. https://doi.org/10.1093/acprof:oso/9780199600458.001.0001

Cafaggi, F. (2012). Transnational private regulation and the production of global public goods and private 'Bads'. *European Journal of International Law, 23*(3), 695–718. https://doi.org/10.1093/ejil/chs053

Callon, M. (1998). An essay on framing and overflowing: Economic externalities revisited by sociology. *The Sociological Review, 46*(1_suppl), 244–269. https://doi.org/10.1111/j.1467-954X.1998.tb03477.x

Callon, M. (2021). *Markets in the Making: Rethinking competition, goods, and innovation*. Zone Books.

Callon, M., & Muniesa, F. (2005). Peripheral vision: Economic markets as calculative collective devices. *Organization Studies, 26*(8), 1229–1250. https://doi.org/10.1177/0170840605056393

Cerny, P. G. (2017). *Partnerships in international policy-making* (pp. 31–47). Palgrave Macmillan.

Coen, D., & Pegram, T. (2015). Wanted: A third generation of global governance research. *Governance: An International Journal of Policy, Administration, and Institutions, 28*(4), 417–420. https://doi.org/10.1111/gove.12164

Cranston, S. (2017). Calculating the migration industries: Knowing the successful expatriate in the global mobility industry. *Journal of Ethnic and Migration Studies, 44*(4), 1–18. https://doi.org/10.1080/1369183X.2017.1315517

Cutler, C. (2004). Private international regimes and interfirm cooperation. In *The emergence of private authority in global governance*. Cambridge University Press.

Cutler, C., Haufler, V., & Porter, T. (1999). *Private authority in international affairs*. SUNY Press.

Dean, M. (1994). *Critical and effective histories: Foucault's methods and historical sociology*. Routledge.

Deleuze, G., & Hand, S. (1988). *Foucault*. University of Minnesota Press.

Dreyfus, H., & Rabinow, P. (1982). *Michel Foucault beyond structuralism and hermeneutics. Pdf*. University of Chicago Press.

Elias, J. (2017). Governing domestic worker migration in Southeast Asia: Public–Private partnerships, regulatory grey zones and the household. *Journal of Contemporary Asia, 48*(2), 278–300. https://doi.org/10.1080/00472336.2017.1392586

Findlay, A., McCollum, D., Shubin, S., Apsite, E., & Krisjane, Z. (2013). The role of recruitment agencies in imagining and producing the "good" migrant. *Social and Cultural Geography, 14*(2), 145–167. https://doi.org/10.1080/14649365.2012.737008

Foucault, M. (1977). *Discipline and punish: The birth of the prison*. Penguin Books.

Foucault, M. (1978). *The history of sexuality: Volume I an introduction*. Pantheon Books.

Foucault, M. (1980). *Power/knowledge: Selected interviews and other writings 1972–1977*. Pantheon Books.

Foucault, M. (1982). The subject and power. *Critical Inquiry, 8*(4), 777–795.

Foucault, M. (1988). Power, moral values, and the intellectual. *History of the Present, 4*(1–2), 11–13.

Foucault, M. (1997). *Society must be defended: Lectures at the college de France, 1975–76*. Picador.

Foucault, M. (2003). *Abnormal: Lectures at the college de France, 1974–1975*. Verso.

Foucault, M. (2007). *Security, territory, population: Lectures at the college de France, 77–8*. Palgrave Macmillan.

Foucault, M. (2008). *The birth of biopolitics: Lectures at college de France 1978–1979*. Palgrave Macmillan.

Furåker, B. (2005). *Sociological perspectives on labor markets*. Palgrave Macmillan. https://doi.org/10.1057/9780230502468

Gammeltoft-Hansen, T. (2013). The rise of the private border guard: Accountability and responsibility in the migration control industry. In *The migration industry and the commercialization of international migration* (pp. 128–151). Routledge.

Geiger, M., & Pécoud, A. (2014). International organisations and the politics of migration. *Journal of Ethnic and Migration Studies, 40*(6), 865–887. https://doi.org/10.1080/1369183X.2013.855071

Green, J. F., & Auld, G. (2017). Unbundling the regime complex: The effects of private authority. *Transnational Environmental Law, 6*(2), 259–284. https://doi.org/10.1017/S2047102516000121

Hall, R. B., & Biersteker, T. (2004). *The emergence of private authority in global governance*. Cambridge University Press.
Hollifield, J. F. (2004). The emerging migration state. *International Migration Review, 38*(3), 885–912. https://doi.org/10.1111/j.1747-7379.2004.tb00223.x
Hollifield, J. F., Hunt, V. F., & Tichenor, D. J. (2008). Immigrants, markets, and rights: The United States as an emerging migration state. *Washington University Journal of Law and Policy, 27*(7), 7–44.
Kahler, M., & Lake, D. A. (2003). *Governance in a global economy: Political economy in transition*. Princeton University Press.
Kern, A., & Müller-Böker, U. (2015). The middle space of migration: A case study on brokerage and recruitment agencies in Nepal. *Geoforum, 65*, 158–169. https://doi.org/10.1016/j.geoforum.2015.07.024
Killias, O. (2009). The politics of bondage in the recruitment, training and placement of Indonesian migrant domestic workers. *Sociologus, 59*(2), 145–172. https://doi.org/10.3790/soc.59.2.145
Koser, K. (2010). Introduction: International migration and global governance. *Global Governance, 16*(3), 301–315. https://doi.org/10.1093/acprof
Kunz, R., Lavenex, S., & Panizzon, S. (2011). *Multilayered migration governance: The promise of partnership*. Routledge.
Kuptsch, C. (2006). *Merchants of labour*. International Labour Organisation.
Lemke, T. (2001). "The birth of bio-politics": Michel Foucault's lecture at the Collège de France on neo-liberal governmentality. *Economy and Society, 30*(2), 190–207. https://doi.org/10.1080/03085140120042271
Loveband, A. (2004). Positioning the product: Indonesian migrant women workers in Taiwan. *Journal of Contemporary Asia, 34*(3), 336–348.
Martin, P. (2017). *Merchants of labor: Recruiters and international labor migration*. Oxford University Press.
Mense-Petermann, U. (2020). Theorizing transnational labour markets: A research heuristic based on the new economic sociology. *Global Networks, 20*(3), 410–433. https://doi.org/10.1111/glob.12260
Mense-Petermann, U., & Schwenken, H. (2022). The analytical capacities and "blind spots" of the market concept in Analyzing cross-border labour migration. In *In search of the global labor market* (pp. 145–161). Brill.
Newland, K. (2010). The governance of international migration: Mechanisms, processes, and institutions. *Global Governance, 16*(3), 331–343. https://doi.org/Essay
Palmer, W. (2020). Prosecuting corporate crime in Indonesia: Recruitment agencies that traffic migrant workers. *Asian Journal of Comparative Law, 15*(1), 23–44. https://doi.org/10.1017/asjcl.2020.5
Pecoud, A., & Thiollet, H. (2023). *Research handbook on the institutions of global migration governance*. Edward Elgar Publishing. https://www.e-elgar.com/shop/gbp/research-handbook-on-the-institutions-of-global-migration-governance-9781789908060.html
Robinson, C. (2018). Making migration knowable and governable: Benchmarking practices as technologies of global migration governance. *International Political Sociology, 12*(4), 1–20.
Rosenau, J. N. (1992). Governance, order, and change in world politics. In *Governance without government: Order and change in world politics* (pp. 1–29).
Rother, S. (2022). *Global migration governance from below actors, spaces, discourses*. Palgrave Macmillan.
Samantroy, E. (2014). Regulating international labour migration: Issues in the context of recruitment agencies in India. *Contemporary South Asia, 22*(4), 406–419. https://doi.org/10.1080/09584935.2014.979763
Schapendonk, J. (2017). Navigating the migration industry: Migrants moving through an African-European web of facilitation/control. *Journal of Ethnic and Migration Studies, 44*(4), 1–17. https://doi.org/10.1080/1369183X.2017.1315522

Shire, K. (2020). The social order of transnational migration markets. *Global Networks, 20*(3), 434–453. https://doi.org/10.1111/glob.12285

Shire, K. (2022). The contributions and limits of market theory for the study of labor markets. In *In search of the global labor market* (pp. 119–131). Brill.

Terranova, T. (2009). Another life: The nature of political economy in Foucault's genealogy of biopolitics. *Theory, Culture & Society, 26*(6), 234–262. https://journals.sagepub.com/doi/10.1177/0263276409352193

Tribe, K. (2009). The political economy of modernity: Foucault's Collège de France lectures of 1978 and 1979. *Economy and Society, 38*(4), 679–698

UN Commission on Global Governance. (1995). *Our global neighbourhood: The report of the commission on global governance*. Oxford University Press.

Xiang, B., & Lindquist, J. (2014). Migration infrastructure. *International Migration Review, 48*(s1), S122–S148. https://doi.org/10.1111/imre.12141

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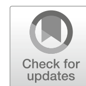
Chapter 3



Labour Supply and Demands of the Market in Domestic Work

> It is pretty common that you look for demand, and then supply. But we want to reverse that. You have your supply, then look for demand. Because every year we have thousands of applicants in our database who are not being utilised because we do not market them well. So I think the best approach right now is how to find a market for them.
>
> —Yolanda Ramos, Manila recruiter

Practices of recruitment at the early stage of the migration trajectory include interviewing and selection of applicants, procedures which are meant to assess their durability, trainability and marketability. Recruitment also establishes "product segmentation" at this early stage, as applicants are slotted into different care-giving roles. This segmentation occurs along essentialised gender and racial lines which categorises ethnic identities and temperaments as either more or less suited to domestic work (de Regt, 2009; Loveband, 2004; Mahler & Pessar, 2006). Agencies routinely trade in ethnic stereotypes as they "position" and market their "products". Certain groups could command higher or lower salaries, depending on specialised needs as well as perceived attitudinal dispositions (Lyons, 2005). Submissiveness and docility or assertiveness and initiative have their uses, depending on the task at hand. In this formal sense, they become human capital whose value is realised not only through their experience and skill, but also physical and non-physical traits.

Actors in the whole "supply chain" are "responsibilised", i.e. take charge of what was once the top-down responsibility of the state (Shamir, 2008). In this model of shared governance, PREAs, employers, workers, and even civil society organisations have their role to play. Sovereign rules in destination countries shape employer, agency, and worker identities, and prime expectations with the goal of minimising if not preventing conflict. Domestic workers' bodies become a site of biopolitical control as they are routinely monitored not only for their health (i.e. lack of disease), but their sterility. This control extends to moral panics and even outright surveillance of their sexuality, which is seen as a possible source of "pollution" in the racist biological sense, and of "corruption" in the spiritual sense. From the very beginning, prospective applicants are primed to be self-governing subjects able to withstand what can be very difficult living and working conditions overseas.

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3.1 Merchants of Labour

Historically, private recruitment agencies have been charged with the placement of domestic workers, for example in Sri Lanka in the 1930s, in which "widespread abuse" was due to the "system of recruitment and supply" (ILO, 1935, p. 810). In research conducted by the International Labour Organization in the 1960s, it recommended the need for these agencies to be subject to public oversight in order to protect domestic workers "from unfair dealing and exploitation (ILO, 1970, p. 393)."

As of writing, the Philippines' newly-created Department of Migrant Workers (DMW) records 1104 recruitment agencies with valid licenses. According to the *Badan Pelindungan Pekerja Migran Indonesia*[1] (BP2MI), the country has 362 agencies (PPTKIs).[2] Malaysia's Ministry of Human Resources lists 310 agencies recruiting domestic workers from overseas (license category B).[3] Singapore's Ministry of Manpower lists 2293 employment agencies that deal with migrant domestic workers in operation. Most of these agencies are located in the capital cities, even though many prospective migrants come from the hinterlands. This is why these agencies need to conduct field recruitment, either in-house, or engage the services of labour brokers, as in Indonesia.

The Philippines has supplied domestic workers to all world regions for over four decades. In 2022, there were an estimated 1.96 million Overseas Filipino Workers (OFWs), of which 44.4 percent were engaged in "elementary occupations". Of the latter, 69.8 percent were female (Philippine Statistics Authority, 2023). This new terminology replaced the previous ones such as "labourer and unskilled workers" and "service workers", categories that have consistently been feminised and have consistently formed the bulk of Filipinos working on short-term contracts. The Philippine Statistics Authority (PSA) defines elementary occupations as involving "the performance of simple and routine tasks which may require the use of handheld tools and considerable physical effort" such as cleaning, food preparation, basic maintenance, among others. In the 1990s, the PSA explicitly named the bulk of service workers as "helpers and related housekeeping service workers" (National Statistics Office, 1997). It is unclear why there has been a change in terminology, and how the Philippine government counts this specific category of worker.

Data from Indonesia's BP2MI records over two hundred thousand deployments in 2022 alone, about 40 percent of which were in the informal sector.[4] The statistical categories are likewise confusing, with "caregiver", "housemaid", "domestic worker", "housekeeper and family cook", "elderly caretaker", "domestic helper" and "care worker", indexed separately, and comprising 46 percent of total

[1] Indonesian Migrant Worker Protection Agency.

[2] BP2MI, List of active migrant worker placement companies.

[3] Ministry of Human Resources, List of private employment agencies.

[4] BP2MI, Data migrant placements 2022.

deployments. From 2017 to 2019, “domestic worker” and “care giver” comprised 51 percent of total deployments.[5]

Regardless of nomenclature in both the Philippines and Indonesia, workers who perform cooking, cleaning and caring tasks have historically comprised a significant percentage of their migrant deployments. For both countries, Malaysia and Singapore are the top two major markets in Southeast Asia. Elsewhere in broader Asia, Indonesia sends significant numbers to Taiwan. Both countries deploy significant numbers to Hong Kong, Saudi Arabia and other Gulf states.

3.2 Chains of Responsibility

In March 2013, I accompanied Kevin Gomez, a field recruiter, to a two-day special recruitment activity[6] (SRA) in Tarlac, a province north of Metro Manila. Gomez, a native of the province, worked for an agency that deployed domestic workers to Malaysia. The first activity was in the town of Capas, where we were given space in the local Public Employment Service Office (PESO).[7] It was a small facility located within the town’s municipal compound, next to the healthcare centre. Posted outside, a poster from Gomez’ agency read “100 domestic workers bound for Malaysia, interviews to be held today”.

Gomez had been having a difficult time finding applicants in his home province. Usually on interview days, people queued an hour before “call time”. Gomez speculated that they were probably having a difficult time attracting applicants due to a territorial conflict between the Philippines and Malaysia in Sabah.[8] He was under a lot of pressure to find workers, he said. He had been travelling all over Luzon[9] to do field recruitment. Unlike skilled workers or factory workers, the demand for

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[5] BP2MI, Data migrant placements 2019.

[6] According to the “Revised POEA Rules and Regulations Governing the Recruitment and Employment of Landbased Overseas Filipino Workers of 2016”, recruitment agencies must secure an SRA permit from the Philippine Overseas Employment Administration (POEA) to conduct recruitment outside of its registered address. The agency must then get the assent from the local PESO facility and the local government. Once the mayor’s office has released an approval letter, the agency may commence advertising on the local radio, TV channels and newspapers. Gomez said these ad venues were not always effective. He preferred putting up tarpaulins and posters at the municipal town hall where there was a lot of foot traffic. Occasionally, he would distribute flyers to barangay halls—the smallest administrative unit in the Philippines.

[7] PESOs were established in 1999 by Republic Act 8789. They are used to disseminate information from the labour department and carry out employment service provision (e.g. job fairs, livelihood programs). As regards prospective migrant workers, they are used to provide labour market information, pre-employment counselling and orientation and reintegration assistance.

[8] The Philippines and Malaysia have a long-standing territorial dispute in Sabah, Borneo. In February 2013 a Filipino sultan sent some two hundred men from his private army to assert his claim on Sabah without the knowledge of the central government in Manila. Malaysian troops were deployed, a skirmish ensued and over 60 people were killed.

[9] Luzon is the largest island in northern Philippines.

domestic workers was constant. He said the business was good, although it was getting more difficult to meet demand with a supply of qualified people. He claimed the money was so good, that some agencies pretended to only deploy skilled workers, when their main business was in domestic workers.

At the Capas PESO facility, two women entered not too long after the doors opened. One of them began filling up the application form. Apart from the usual information, there were questions specific to the kinds of tasks a domestic worker might perform, and "personal questions" to do with health concerns that would be important in a household context. Would they be willing to comply with workload and working time conditions—if they could "look after children and do all the housework like cooking, laundering and cleaning by [themselves]", if they could care for an infant or child at night, and whether they were "willing to work without taking [their] off-days".

Gomez asked the applicant about the information in the filled-out form, testing the latter's English (Fig. 3.1). Satisfied with her language skills, he switched to Filipino to discuss practical matters. After giving her details on how to reach the agency's Manila office for the next round of interviews, Gomez concluded his assessment. She would probably leave in a month or so, if she got all her papers in order. How did he evaluate an applicant's chances?

> (Translated from Filipino) Sometimes you can see from their looks, if they'll be deployed. Or whether someone might go, but will probably not succeed because she lacks courage.

APPLICATION FOR EMPLOYMENT AS A DOMESTIC HELPER

PERSONAL PARTICULARS **REF NO:**

Name:			
Address:			
		Tel:	
Date of birth (dd/mm/yy):		Age:	Sex: Female
Place of birth:			
Nationality: Filipino	Religion:		
Civil Status:	Height:	Weight:	
Complexion (Fair, Tanned or Dark):			
Passport No:	Date of issue:	Date of Expiry:	
Place of issue (passport):			

FAMILY RECORD

	Name	Age	Occupation
Father			
Mother			
Spouse			
Number of children:	Ages:		
Number of brothers:	Ages:		Position in family:
Number of sisters:	Ages:		

EDUCATION & OTHER PARTICULARS

	Name of school/college	Years	Results
Elementary			
High School			
College			
Course/s taken in college:			
How is your spoken English? (Good, Satisfactory or Poor):			
What other languages do you speak?:			
Hobbies:			

SKILL: (1=Well 2=Satisfactory 3=Little 4=No Knowledge)

	How well can you .... (Answer 1, 2, 3 or 4)	Any Experience (Plenty / Little / No)	Willingness (Yes / No / Prefer Not)
1. cook?			
2. wash clothes?			
3. iron clothes?			
4. clean the house?			
5. look after babies?			
6. look after children?			
7. look after the sick?			
8. look after the old?			

WORKING EXPERIENCE IN PHILIPPINES

Employer	Dates (From – To)	Nature of job / duties

Have you been or worked abroad before?* (Yes or No)

FOOD PROBLEMS (IF ANY)

Mark with an (X) on the following food items that you can/cannot eat or touch and the reason why:

Food	Eat		Reason			Touch		Reason		
	Yes	No	Preference	Religion	Health	Yes	No	Preference	Religion	Health
Beef										
Pork										
Chicken										
Fish										

PERSONAL QUESTIONS

	Answer (Yes or No)		Answer (Yes or No)
Do you smoke?		Do you feel confident when left alone with children?	
Do you drink alcohol?			
Are you afraid to stay alone in the house?		Can you look after children and do all the housework like cooking, laundering and cleaning by yourself?	
Do you have any physical defects?*			
Do you wear glasses or contact lenses?			
Have you suffered from any major illness in the past?*		Are you willing to sleep with and take care of a baby and or children at night?	
Do you suffer from any skin disease?*		Are you willing to work without taking your off-days?	
Do you suffer from any allergy?*			
Are you willing to look after dogs?		Do you have any relatives or friends in Malaysia?*	
Can you sing?			

*(If 'Yes', give details in box marked 'Additional Information')

Additional Information

DECLARATION

I hereby declare that the information I have given above is to the best of my knowledge and belief true. Should any of the above information be subsequently found to be incorrect, I may be dismissed from my employment and repatriated at my own expense.

(Date) (Signature of applicant)

Fig. 3.1 Application form

> You can see their attitude from how they move. Some will fight back if you scold them. Some will cry. If they're scolded everyday they might go insane. They can't handle it. They can't…When you arrive you shouldn't think your employers are angels. Once you arrive, expect they'll be strict. Not everyone can be a housemaid.

Gomez said the "secret to recruitment" was in their agency's orientation. He would assure applicants that their agency was different from others, that they screened really well. Others recruited without interviews, selecting applicants from their biodata or application form. Gomez' agency made sure their recruits spoke good enough English, and that their prospective employers could see and interview them through Skype. He would tell applicants to think carefully, and to assess whether the work load was too much. Because once they were deployed—they would not be able to change employers for two years. A decision they could regret for two years, he said.

Apart from their language and practical skills, recruiters like Gomez will screen for workers who would persist in the migration trajectory. These are usually women who have family dependents—small children or elderly parents. In an inversion of discrimination in the formal labour market, family responsibilities are a good indicator of the worker's willingness to persist even as the whole recruitment process emphasizes the difficulties and possible dangers ahead. It is not simply that they are "responsibilised" subjects able to self-regulate within a matrix of distributed market authorities apart from state apparatuses (Shamir, 2008), but that they have dependents back home who are reliant on their remittances.

The Philippines and Indonesia both have mandatory information sessions that workers must attend before departure. The Philippines Pre-departure Orientation Seminar (PDOS) was a programme that was launched in 1983, while Indonesia's *Pembekalan Akhir Pemberangkatan*[10] (PAP) started in 2006. Both are day-long sessions where workers are given information about their country of destination, important details in their employment contract, available government services, and health and financial tips. They manage expectations and are aimed to mentally prepare workers for the journey ahead. Most importantly, these sessions impart the possible risks. The PDOS may be conducted by the Overseas Workers Welfare Administration (OWWA), but also non-governmental organisations, and even recruitment agencies themselves. While the PAP is held exclusively by government offices *Badan Nasional Penempatan dan Perlindungan Tenaga Kerja Indonesia*[11] (BNP2TKI) and the *Balai Pelayanan Penempatan dan Perlindungan Tenaga Kerja Indonesia*[12] (BP3TKI).

Manila recruiter Hilda Tuason conducted PDOS as well as pre-employment seminars[13] (PEOS) with prospective migrants. She claimed her PDOS differed from

[10] Final departure briefing.

[11] National Agency for the Placement and Protection of Indonesian Migrant Workers.

[12] Indonesian Migrant Worker Placement and Protection Service Centre.

[13] The PEOS is one of two non-mandatory info-session that complements the PDOS. The other is the post-arrival orientation seminar (PAOS) that takes place upon arrival at the destination country.

ones held in OWWA because it was based on practical problems encountered by workers themselves. "If they encounter an employer who is stingy with giving them food, they should do this or that.[14]" While the government's PDOS was "basic", hers made sure the worker would not want to return prematurely, because that would mean that her company would shoulder the repatriation costs. "If the person comes back, it's a huge cost. We would need to pay for their plane ticket, the cancellation of the visa, exit clearance, and so on."

Apart from the risk of absconding workers who will not be able to finish their two-year contract, above-board agencies like hers also suffer from competitors who are deploying workers illegally. While her workers would need to go through the whole recruitment and training process, apart from government-mandated processes such as medical clearance and the PDOS, illegal deployment is quick. "Illegal recruiters don't care. They don't do interviews. No OWWA, no assessment, no training. Nothing. Deploying someone legally is a long process." Tuason was particularly irked by OWWA's Language Training and Culture Familiarization Program,[15] which was difficult to schedule quickly given that there were not many available slots. "It will take a month before we can schedule something. They don't have many trainers."

While domestic workers are cultivated to become responsibilised subjects able to fend for themselves, recruitment agencies are likewise made responsible for what would otherwise be the governmental function of regulation. In the Philippines, the "joint and solidary liability" (JSL) is a legal construction that allows the government to hold Filipino recruiters liable (along with foreign employers) to claims and damages during the workers' employment overseas, for example the non-payment of salaries (Ambito & Banzon, 2011, p. 10). The JSL would, in principle, allow workers to file for damages and be compensated in the Philippines if they are unable to do so in the receiving country. In practice, the legal system makes it so that migrants would rather settle with the agency for a reduced amount rather than wait 5 years or more of litigation (Migrant Forum in Asia, 2014).

In Indonesia, migrants could, in principle, be insured for health, accident and life risks. In practice, female migrants have little access to this type of social protection either due to lack of information, or concerns about making claims (Istianah & Hekmatyar, 2023). Corruption and collusion between insurers and recruitment agencies also reduce the likelihood of making pay-outs. The latter "have an interest in hiding claimable items from the state that could result in legal sanctions" (Palmer, 2016, p. 70).

For twelve years, Pak Irwan had been working for his PPTKI[16] in Bekasi, a Jakarta suburb. He described having to conduct business at "three levels of

[14] Translated from Filipino.

[15] In response to specific needs of domestic workers, OWWA launched the Comprehensive Pre-Departure Education Program (CDEP) in 2009. These orientation seminars usually run from 2 to 6 days, including language training.

[16] *Perusahaan Penempatan Tenaga Kerja Indonesia* or Indonesian migrant worker placement company.

networking". The "upper" network had to with building relationships with agencies in the receiving country. He said that they had three partners in Singapore, although their biggest market was Taiwan. The "middle" network had to do with the government, especially at the local level. And the "bottom" network, had to do with the *calos*, the field recruiters. This bottom network was the most important, because they were the ones who went to the villages to convince prospective workers to migrate, who had to deal with their family members, and the local government officials. It was Pak Irwan's job to deal with the field recruiters, as well as the middle network. "It is important to have a good relationship with government. If there is a problem, they can support us. If we do not have a close relationship, they will not support us."

There was competition at the upper and bottom levels of networking. Pak Irwan's company competed with other agencies offering their workers to the employment agency in the receiving country. If they did not compete on price, they competed in quality, depending on the demands of employers. They also competed with other agencies over access to field recruiters. They paid them "per head". Pak Irwan said that they know the field recruiter was loyal if they came regularly, bringing one or two prospective migrants a week. Because there was a scarcity of women willing to migrate as domestic workers to Malaysia, agencies were "in fierce competition with each other" (Killias, 2018, p. 88).

Employers are likewise "responsibilised", primarily through the financialisation of risk. Apart from recruitment fees, employers pay all kinds of administrative fees. In Singapore, employers pay a monthly levy of 300 SGD[17] for hiring a foreign worker.[18] In Malaysia, employers do not pay such a levy for a migrant domestic worker. In Singapore, employers may lose a 5000 SGD[19] security deposit or bond paid to the government if the worker absconds or violates the conditions of their work visa. Employers are also responsible for making sure that the worker attends the one-day Settling-in-Programme (SIP), and pay for the worker's medical and accident insurances. The SIP is conducted by the Ministry of Manpower's accredited training providers. First-time migrant domestic workers are supposed to attend the SIP upon seven days of arrival. The cost (76,40 SGD) is borne by the employer. A survey of Indonesian and Filipino workers showed low rights awareness. The SIP focuses on physical safety instead of workplace entitlements. There have also been reports of employment agencies confiscating a handbook given to workers on this day as soon as they return from the programme (Yuen Xin Er & Paul, 2020).

Employers will forfeit the security deposit if the worker goes missing,[20] and if employers fail to make sure the worker is repatriated at the end of the employment contract. This leads them to "excessively regulate the lives" (Tan, 2010, p. 113) of

[17] 220+ USD.

[18] Employers may qualify for a levy concession (60 USD) if they have a child younger than 16 years old or an elderly person who is at least 67 years old living in the household.

[19] 3700+ USD.

[20] Employers are given 1 month to find the worker. If they show reasonable efforts to find her, and have filed a police report, only half of the security deposit will be forfeited.

workers to make sure they do not commit acts that would put them in breach of their work permit conditions—for example if they worked in another occupation, if they married a citizen or permanent resident, if they got pregnant,[21] or delivered a child in Singapore. Apart from this, workers are required to undergo a medical exam every six months to ensure that they are free from infectious diseases and pregnancies.

In 2004, Singapore required first-time employers to attend an Employers' Orientation Programme (EOP). The EOP is a three-hour equivalent of the SIP, and briefs employers about their role and responsibilities, and how to maintain a healthy working relationship with their worker. They must complete the EOP at least two working days before applying for a work permit for a domestic worker. Those who have changed workers at least three times in a year are also required by the Ministry of Manpower (MOM) to attend the EOP. Classes are given by MOM-mandated agencies. In the latest guide for employers produced by the MOM, employers are reminded that hiring a migrant domestic worker is a serious responsibility with financial and legal implications. The employer is enjoined to be ready to give even more training and supervision, if the worker does not function as expected, to "guide her and correct her mistakes patiently" (Ministry of Manpower, Singapore, 2021, p. 3). Chapter 5 on management will examine these guidelines in more detail.

While the Philippines has no bilateral agreement with Singapore in regard to the governance of migrant domestic workers, the Philippine Embassy has an agreement with the Association of Employment Agencies in Singapore (AEAS). The latter agreed to the initiatives of the Philippine government, notably setting a minimum wage of 400 USD, and for Singapore agencies to only deal with recruitment agencies duly accredited by the POEA, among other conditions. This agreement is an example of the "triple blurring of the public/private, national/international, and governmental/non-governmental divides" (Marti, 2018, p. 1348), in which the Singapore state governs through these market actors. This off-shoring of governmental functions also entails off-loading risks and responsibilities, where the Singapore state "can hide behind a 'corporate veil'" (Marti, 2018, p. 1355) if the migration industry is accused of wrongdoing.

These are some of the major risks in the labour supply chain—the unpredictability of government services as outlined above, the steadfastness and commitment of prospective migrants, and competition over supply and demand streams of workers with both legal and illegal recruiters. A chain of risk-taking and responsibilisation binds workers, recruitment and employment agents, and finally employers. These intricate chains of responsibility are enmeshed in heterogeneous complexes that rely on various techniques of power. States create conditions that govern actors operating in domestic jurisdictions as well as transnational spaces in combination of these techniques. The migration bureaucracies in all four countries create relationships with subjects over which they may exercise jurisdiction—recruitment agencies and workers in the Philippines and Indonesia, and employment agencies and

[21] Employers are exempt from forfeiting their security deposit if they can prove that they have informed the worker that getting pregnant was a breach of work permit conditions, and that they have reported this violation.

employers in Malaysia and Singapore. Legislation creates the parameters under which PREAs may incorporate, and influence business operations by allowing the "import" and "export" of workers from certain countries.

Mandatory administrative practices, such as the PDOS, PAP, and EOP help create identities as "workers" on the one hand, and "employers" on the other. The low-rights context, as well as the liminal space in which domestic workers operate, mean that employment relations are essentially governed by chains of responsibility of individuals who are socialised into being entrepreneurial subjects. On the one hand, workers are invested human capital who, as units of economic utility, actualise their migrant rationality by remitting money back to their family left behind. On the other hand, employers are investors in a privatised care arrangement to sustain their household and the members therein. In the absence of public investment in welfare and provision of care services, employers and workers draw on and participate in market forces to sustain the reproduction of their own families.

The economic risks for PREAs stem from competition with each other, with illegal recruiters, and sometimes even entities in migration bureaucracies, for access to labour markets (supply and demand). The primary regulatory levers are the state's power to grant and withdraw business permits and licenses, subject to rules of incorporation. Increasingly, both sending and receiving states are developing a demerit system, in which prospective consumers (i.e. employers and workers) make choices depending on the market performance of PREAs. This consumer-centric mechanism is most developed in Singapore.[22] For the Philippines, Indonesia and Malaysia, employers and workers only know which agencies are active, and which ones have had their license suspended or permanently revoked.

3.3 Recruitment Selection: Priming the Ideal Domestic Worker

Pausing from a drill on Arabic words for household items, Ibu[23] Annie sensed her students' energy were flagging. It was mid-afternoon in Bekasi, a sleepy Jakarta suburb. The threat of an April shower was hardly conducive for paying attention. But Ibu's voice was gentle but reassuring. She scanned the faces of her charge, a dozen or so women who could not have been much older or younger than her own mid-thirties. She reminded her students to be positive. They should think about the end result of their upcoming migration journey—the welfare of their child and family. If they were scrubbing the bathroom, she said to remember their salary "to ease your pain".

[22] More detailed discussion in Chap. 5: Quality Control, Mediation and Management.

[23] "Ibu" is a form of address showing respect. It literally means 'mother.' I have witnessed this term used in formal and informal settings (in private firms and government offices).

It is in the interest of agencies to deploy domestic workers who will finish their employment contract no matter the challenges of their migration trajectory—from recruitment, training, placement and return. Due to the poor regulatory conditions, and the low labour rights context of these countries, these challenges may include withholding or non-payment of salary, confiscation of travel documents, physical immobility (i.e. unable to leave training centres, households where they work), and different forms of mistreatment (physical and psychological) (Awumbila et al., 2018; Parreñas et al., 2020; Varman et al., 2023). In these initial interviews, recruiters will look for reasons for the worker to endure—a family situation might include an unemployed or disabled spouse, young children or sick parents. Where the domestic worker will be the primary breadwinner, it is assumed she is less likely to resign, run away or ask to be repatriated.

Discourses on sacrifice and heroism are routinely deployed, not only by recruiters, but state apparatuses and the popular media. Migration is seen as a baptism of fire, where workers' resoluteness and faith are tested (Bautista, 2015). Heroism encourages nationalist sentiment and ties the migrant to her homeland. Fulfilment of her duty as a citizen and as a member of her family translates into remittances sent home (Magalit-Rodriguez, 2010). Heroism of course also denotes martyrdom. The orientation seminars PDOS and PAP seriously or jokingly imply that death is a distinct possibility in the worker's migrant trajectory. There may be a discussion of the life insurance for each worker deployed, and benefits that would accrue to left-behind family members.

Ibu Annie thought that part of her job was to ready her students for battle, prospective migrants bound for Abu Dhabi. She said they were pahlawan, heroes ready to go on a "jihad". The term was apt as she saw the challenge of working overseas as an internal struggle, where the main enemy was a self that was susceptible to homesickness, fatigue and demanding or cruel employers. She said that the most difficult part in her teaching was imparting self-confidence and encouraging strength. The most important lesson to learn was "mental education".

The Filipino *bayani*[24] and the Indonesian *pahlawan* are modern-day heroes who have the impossible task of saving themselves, their families and their nations. The migrant succeeds, i.e. saves and redeems herself, by transforming into a heroine. Selflessness and sacrifice are some of the strongest discursive frames employed by agencies in convincing migrants to forsake their families in the short-term in order to secure their well-being in the long term. Selflessness and sacrifice are also employed whenever the going gets tough. It may be paradoxical to juxtapose the empowered heroine with the servile servant. It is not so paradoxical when one looks into how the frame functions to enable the worker to endure the impossible.

In this very specific labour market, the state and recruitment agencies cultivate a gendered breadwinner. When the gentle exhortations of governmentality do not work, recruitment can just as easily exercise old-fashioned disciplinary practices. Agents will look out for applicants who, instead of enduring, might put up a fight.

[24] Filipino word for "hero".

They couch this in terms of applicants being too *bibo*, *pasaway* (a smart aleck), or too educated. They manage expectations by saying a "maid" should not have too much pride. For Manila-based Hilda Tuason, language and practical skills may be necessary, but are not sufficient criteria for putting someone in her pipeline. The clincher, for her, is the right attitude. She did not like it when her applicants spoke excellent English, or when they seem to know everything. She did not like it when they were *maarte*—choosy when it came to where they would be deployed, or what kind of employers to whom they would be assigned. She once rejected an applicant for being too *pilosopo*.[25]

While a migrant worker is subject to modes of domination (exploitation), she is also a participant in her own "subjectivation" (Foucault, 1978, p. 60). Discourses from governments and agencies on overseas work during the recruitment stage aim to create self-regulating subjects able to essentially govern themselves. They are transformed into modern-day heroes able to save themselves, their families and the nation. The process of weeding out the "weak of heart" and the irresolute during recruitment and the experience of training are meant to produce a specific kind of subject. This subject is "empowered" so that she may withstand disempowerment. In the words of a bureaucrat from OWWA, the PDOS was meant to "help them, to empower them, to help them adjust, to empower them to decide on their own".

3.3.1 Spirituality and Pastoral Care

Foucault attributes the idea of governing people to the cultures of the Mediterranean, first in the pre-Christian then during the Christian period. Unlike sovereign power which is exercised over the territory, the shepherd exercises his power over the flock, to guide them in their movement from one place to another (Foucault, 2007, pp. 123–125). Pastoral power's end is the salvation of its flock. Pastoral power is a "power of care" (Foucault, 2007, p. 127).

Because migration is fraught with risks, it is often seen as a leap of faith. PDOS and PAP exhort prayer to help deal with stresses of working overseas. In one of the PAP sessions I attended, the instructor equated working with worship:

> The most important is to submit to God. Praying to God. We obey God's mandate. Our willingness is based on God's testament and our religion…Submit to god, we must be resilient, tough. This will be considered as praying, worship to God. Working is considered worship to God.

Pak Ismail, an Indonesian government official who conducted PAP sessions, said that no one could protect the migrant but herself and God. "What does God help you with? With your mouth and hand. You have to learn to protect yourself. Everything must start from ourselves. Protection starts from ourselves." I observed him in action in one of the sessions organised by the BP3TKI. Among other things, he was

[25] Someone who reasons and questions.

Fig. 3.2 PAP

tasked to speak about the legal framework in the receiving country. The other instructor, also a government official from the BNP2TKI, was set to talk about health and sexually transmitted diseases (Fig. 3.2).

Pak Ismail wrote “mental” on the whiteboard. He said what made a person successful was their mentality. Working for their family was not enough. If they only wanted to do that, they could do so in Jakarta. If they were just thinking about money, then their mentality was simply that of a worker, not a manager. They needed to learn to lead themselves. He said that it was frustrating to teach Indonesians because they cried all the time. “Don’t cry. You’re already being abused. Don’t cry. If your husband cheats on you, then no problem, get married again”. There was no shame in being a migrant worker. He spoke about the story of a domestic worker who had come from Taiwan and was now an interpreter for BNP2TKI. She used her savings to go back to school. He recounted another story of a migrant who was now a doctor. “Just praying is not going to be enough. After you pray, you must do the effort as well”.

Migrants domestic workers who often undergo extreme duress have turned to spirituality and religious communities to draw strength, and form communities (Liebelt, 2011; Williams, 2008). At the same time, these spiritual idioms are mobilized by the state to weld piousness with sacrifice for the nation and the family left behind (Bautista, 2015). Where there is no recourse to making legal or rights-based claims in the receiving country, limited access to social networks, and weak mediation on the part of embassies, workers must draw on reserves of mental and spiritual strength from whatever resources available. For practicing Muslims and Catholics,

prayer goes a long way. Some even bring magical talismans (Verma, 2011), although these are officially banned.

Aside from the cold rationale of economic need, agencies and government officials feed the sacrifice/heroism discourse by depicting prospective migrant workers as subjects in need of salvation or redemption. There is a delicate balance between enduring hardship to earn a living for one's family, and doing whatever it takes to achieve this goal. There are instances of reported prostitution among migrant domestic workers to make sure they have enough money to remit back home. They may also turn to prostitution if they became undocumented by running away from employers (K. Chang & Ling, 2000; Strobl, 2009). Anna Nocum, an agency owner in Manila, would send her charge to a three-day "parish renewal experience" for "spiritual enhancement" before they left. She said that this was meant to protect them from falling from grace, that is, be tempted by money troubles, and also turn to prostitution. It may also be the case that they could be unfaithful to their husbands left behind. She then recounted a story of a Filipino domestic worker in Singapore who had six boyfriends, and who then contracted a sexually transmitted disease. This was why she did not want her girls to have days off, for them to leave the house by themselves.

Moral panics about domestic workers' sexuality stem from a number of different factors. Living in proximity of male members of the household, they may be seen as a threat to its moral purity (Yeoh & Huang, 2009), if not the nation itself (Näre, 2012). Domestic workers are therefore subject to discourses that seek to control their sexuality, for example through stereotypes of promiscuity (K. A. Chang & Groves, 2000).

Agency owners in Kuala Lumpur, Mr. and Mrs. Chong, saw their "girls" as "troubled" and in need of rehabilitation. Mrs. Chong was especially concerned with their sexuality, and what she sees as their promiscuity. She recounted how some women would go Cheras[26]to rent rooms and charge sailors 60 ringgit per session. She did not fault them for this, especially the ones who were married or have "tasted the forbidden fruit". Mrs. Chong felt that this was her mission. They were from a troubled background, and she felt it was her Christian duty to give them temporary shelter. Ideally, the girls were not to stay longer than two years so that their family bonds would remain strong and they could readjust when they went back home. "I mean, we try to protect [them] in a way, but maybe they think we're overprotective, and we like to bring the girl back the way she came".

This pastoral care has within it elements of indebtedness, of a debt-of-gratitude to the recruiter who is in the position to broker all kinds of advantages to the worker (e.g. days off), and even extend informal social protection, for example as a temporary shelter in cases of severe conflict with employers (Awumbila et al., 2017). This moral economy has also been described as a patron-client relationship (Rudnyckyj, 2005). The debt is not only figurative, i.e. giving the prospective migrant the

[26] A suburb east of Kuala Lumpur.

opportunity and status to work overseas, but also in the recruitment agency's initial capital outlays in training, medical exams, airfare and costs of documentation.

Pastoral care, unlike other forms of power is "salvation oriented", giving (in contrast with sovereign extraction), "individualising", and is linked with truth production—the "truth of the individual himself (Foucault, 1982, p. 783)". Technologies of the self are techniques performed by workers on themselves with the help of "truths" produced by discursive knowledge. Aside from the state, recruitment agencies and training centres are sources of truth production. Workers are primed to believe themselves to be capable of hardships for the sake of their families left behind, and to realise their ultimate objective—remit money back home.

Meanwhile, migrant domestic workers have gendered bodies that, while guaranteeing the reproduction of families and households in destination countries, must never reproduce themselves. Unlike more privileged categories of migrants, domestic workers in Malaysia and Singapore are not eligible for family reunification, and are certainly not allowed to bear children. One of their basic condition of employment is that they remain sterile, and are monitored every six months to ensure this remains the case until the end of the employment contract. In Singapore, it is difficult for a domestic worker to marry a citizen. In certain cases, the Ministry of Manpower has to give consent for such a union to take place. The boundaries drawn between natives and foreigners, within and without the household, extend to the literal biological divides between a good, healthy, population and the "polluting" (Yeoh & Huang, 1998) influence of sub-optimal groups.

3.4 Product Variability and Marketability

Something becomes a "good" to be marketed and sold when it undergoes two processes. First, it becomes a "product undergoing qualification". It then leaves "the world of supply", to become "entangled in the networks of sociotechnical relations" of the buyer's world (Callon & Muniesa, 2005, p. 1234). Marketable objects become commodities (Mense-Petermann, 2020, p. 416). And objects are attributed different qualities and classified as "different classes of similar products" of variable prices (Mense-Petermann & Schwenken, 2022, p. 154).

Recruitment and worker selection can be conducted with as much or as little care as the agency's capacity and practices dictate. A more careful process is geared towards a niche market. Smaller and medium-sized agencies will try to minimize costs incurred by "failed maids"—workers who will not be able to finish their contract, run away or demand to be repatriated. These agencies are also more concerned with reputation as they have a smaller clientele base. Bigger agencies will want to deploy big volumes in as short a time as possible. These agencies will not likely be concerned with the worker's skillset or her degree of compatibility with the employer's household.

Noelle Ngo, a Singapore agent described OMOs (one-man-operations) being more meticulous in matching workers with employers. "They don't have big office

overheads to meet, so they are one-to-one, they really study your case." The smaller agencies get to the nitty-gritty, what is the specific job scope, whether there is a pet to care for, everything is told to the employment agent. Ngo said that the Association of Employment Agencies Singapore (AEAS) had been lobbying the Ministry of Manpower to reduce the minimum age restriction to 21. This would mean the pool of potential migrants would be bigger.: "Employment agents are business-oriented. The more the merrier…But the employer will want a more mature girl." If there are caregiving duties, older workers are more suitable, not only because they are more patient but they may have been selected for having already had children themselves. While the age restriction has remained the same (23 years old minimum), there continue to be underaged workers who manage to slip through, especially with countries that have lesser regulatory capacities (Ho & Ting, 2023, p. 149). This is because the age limit also affects the bottom line for recruitment agencies in sending countries. As such, it is a known practice that agencies, with the collusion of corrupt officials, falsify identity documents to manipulate workers' age (Killias, 2018, p. 98).

The age of workers also mattered in terms of perceived attitudes and aptitudes. Employers preferred younger ones because they were thought to be more easily managed and were not yet set in their ways. Some respondents said they were only good for general housework as this required more physical effort. Kuala Lumpur agent Mr. Chong usually made a distinction between someone who was only good for cleaning and household chores, and someone who had the aptitude of a caregiver. The former he called "maid-maid" and the latter "nanny-maid". "Someone has to be physically strong to do this job…[when] you sweep the floor, you need energy. [When] you cook, you need energy."

If the household demanded elderly care, then older applicants would likely have more experience (i.e. having cared for their own parents or relatives) and, more importantly, more patience. They were more willing to clean up bodily discharge and deal with the challenges of senility. Child-carers were ideally younger because they would need to keep up with their charge and be more "sociable". Those who already had children were preferred because they had personal experience to draw from. Experience working overseas was not necessarily an advantage. It would mean that the worker already knew what to expect. If she was able to complete her contract then she has been tried, tested and proven to succeed. According to another Kuala Lumpur agent, Amrita Mudaliar, the down-side to an experienced worker was that she was more knowledgeable, hence less manageable. If she wanted to return to a country where she was previously deployed, it was likely that she had already established contacts and a set of friends. She would most definitely insist on days off.

Mr. Chong's wife, Mrs. Chong, would put a positive spin on girls who would express being homesick, and would cry a lot. She said it was good for girls to cry, if they did not, that would make them a "very hard person". And who would entrust childcare to someone like that? To highlight how superior Filipinos were, they said Indonesians "would not last". And Cambodians were "not suitable". They were hardened because their country had not known peace. They were not caring because they only knew to think of themselves in order to survive. Agencies have routinely

deployed stereotypes that attribute characteristics or traits to groups depending on the needs of employers or perceived cultural traits of the receiving country (Bakan & Stasiulis, 1995, p. 310). Whether one was thought of as more or less submissive or assertive, or more or less "smart" depended on the needs and requirements of employers. Sometimes skin colour aligned with perceived cleanliness and hygiene, with marked preference for lighter skin (de Regt, 2009). The photos of prospective migrants were also important to determine whether their looks might pose a possible threat to the employers' marriage (Antona, 2023, p. 431). For this reason, many agencies are very careful to play down their workers' femininity and sexuality, and may require that they keep their hair short in the duration of the contract. The control of workers' mobility and access to public spaces (i.e. days off) is justified by preventing workers from possibly bringing sexually-transmitted diseases into the household.

While there are male domestic workers, especially in the Gulf States, females are still the preferred sex for reasons other than gendered attributes of domestic work. Male migrants are not "convertible" like female migrants. Unlike skilled employment, the demand for domestic work is constant. So a prospective female migrant with a degree in IT or hospitality management may easily be repackaged into a domestic worker and leave. Her male peer would not be able to do the same.

Agencies' recruitment and marketing techniques pander to the perceived nature of domestic work, and gendered expectations about what makes a good domestic worker. What is being marketed and ostensibly sold is service provision (tasks, abilities, experience), but also qualities of personhood (skin colour, temperament, ethnicity). In all, there is no ideal candidate in terms of skill-set, experience or age bracket. Her marketability and variability as a "product" depend on the needs of the specific employers, needs which are segmented according to affective and physical aspects of household and caring tasks. Agencies package and position aspects of workers' identities opportunistically. But whatever their background, the most important trait is the capacity to adjust, adapt and endure, without which the entire value chain would collapse.

PREAs, through their conduct of business, reinforce the "commodity status of labour power" (Vosko, 2000, p. 18). While domestic workers as people are literally reproduced outside the non-market sector, they are fully realised as domestic workers in this neoliberal market regime. Further, through product variability and marketability, it strains the fiction that it is only labour power that agencies buy and sell, but rather characteristics of personhood itself.

Domestic workers are converted into units of human capital whose promised return of investment creates value at nearly all stages of migration. Aside from recruitment agencies and training centres, other businesses profit from the migrant's journey—medical clinics, insurance companies and other financial institutions like banks and loan services. The investment bears fruit in the form of her remittances which then reach home and are used to pay for her children's education, her family's household expenses and maybe even a little business. The PAP and PDOS repeatedly emphasise that the reason one migrates is to make money, to save and even to

invest. When their spirits flag while deployed overseas, agents remind them of their primary duty—to economically support their families.

Literature on remittances sent by migrant women show that they tend to remit more than men in proportion to their income. Remittances are spent on education and healthcare of children left behind (Pickbourn, 2016; Rahman & Lian, 2009), medicine and care costs for elderly parents, and the everyday substance of the migrant's household (Eversole & Shaw, 2010; Semyonov & Gorodzeisky, 2008; Susilo, 2014). In other words, she functions as a unit of biopower for two populations. An implication is that thinking which seek to invest remittances in "productive" or entrepreneurial activities leading to "economic development" actively redirect resources away from social reproduction, further worsening the "care deficit" or "care drain" in sending countries (Gammage & Stevanovic, 2018; Nyberg–Sørensen et al., 2002).

A healthy body is something to be valued not only for its own sake, but because it is a condition for deployment and continued employment. All workers must undergo a medical exam before leaving (as required by the sending country governments) and upon arrival (as required by receiving country governments). In a job which entails ceaseless, repeated, tactile movement—climbing on top of a chair to clean the top of a drawer, crawling on all fours to wipe the floor clean, running after a toddler, lifting an invalid to change clothes—the body's proper care and functioning must be a priority.

3.5 Sovereign Rules and the Domestic Worker Market

All the recruitment agencies I was able to access in Manila, Jakarta, Kuala Lumpur, and Singapore complained of government regulation. Nearly everyone called to let "market forces" work to determine prices. A one-person agency in Singapore, operated by Amina Abdullah, claimed that the market was so open that advertised fees could be as low as $88 SGD and as high as $1800. She was unhappy with their reputation as "blood suckers" and "bad guys", but said this was not altogether an unfair judgment:

> Let us say the agency fee is $188. Of course you will come to that agent right? Two years – free replacement. And I do not like that also. Do you know why? Because the owners will fall on the maid. $188 – you want a customer. Fine. The maid – I will charge them ten months' salary pay cut. Sometimes even a year. Nine months. And the sad part is that – say, both are crooks. Singapore agent, Indonesian agent. I call them father and mother crooks…You cut down seven months. You are asking for this amount – we have got rent to pay. We can make commission. But we are also greedy. Greedy there, greedy here. Who gets squeezed in between? Seven months. Maid comes in. The ball is in their court right? The Singapore agent. I cut eight months, nine months. So the maid is just – I just visualise the maid like goats and sheep. Just coming, ready to be slaughtered.

Agencies competed over limited markets of labour supply and employment demand. Complying with rules significantly diminished competitive advantage especially

because illegal and unlicensed agencies also go for the same labour and employment pools. The common complaint was that the government was not doing enough to police and prosecute illegal recruiters, and that it was turning a blind eye to foreign placement agencies (FPAs) who seek to control either end of the supply chain. All these other players were of course eating into their market share without the cost of rule compliance. On top of the added expenses incurred by proper documentation, the most significant cost was the length of time to deploy. Going through the bureaucratic grind could take as long as two months while unlicensed agencies could deploy in a week or less.

Singapore agent Yuan Guo Sheng thought that market forces had not been allowed to work to their fullest potential. He said that it was difficult to account for Indonesia's field recruiter system because these were free agents who charged as much as they could, given the information asymmetry and Indonesia's very large geographic expanse. The Philippine no recruitment-fee model, on the other hand, pushed down cost. If the worker paid nothing, then her employers were the ones bearing the costs and paying the supplier. They would then want the lowest possible fees. Meanwhile, the Singapore agent could charge the worker two months' worth her salary, as stipulated by law. This was a good set-up, according to Mr. Yuan, if everyone followed the law and there were no under-the-table deals being made by agents on either side of the migration stream. If agents did collude, this was when the worker could be charged six or eight months' worth her salary. If her employer was in on the deal, she would be lucky to get any salary at all (HOME, 2014).

The overlap, absence, or outright contradictions in sovereign jurisdictions encourage actors to resort to non-legal means to deploy and receive workers. Until and unless a uniform transregional regulatory framework is put into place—illegal recruitment, and consequently human smuggling and trafficking will continue. The technique of issuing a deployment ban, usually executed by states whenever there are allegations of abuse or dispute over terms of labour import/export, is ineffective because it merely encourages migrants to leave/enter sovereign jurisdictions to leave/enter via illegal means (Encinas-Franco, 2016, p. 496). Deployment bans thus succeed only in creating a black market in domestic workers. The state's exercise of sovereign power fails not only to circumscribe sovereign space (i.e. control the spaces of legality) but in fact produces spaces of illegality and "illegal" subjects.

3.5.1 Law-Making and Law-Breaking

PREAs co-constitute sovereign power by treading the legal/illegal and circumscribing the bounds/boundaries of sovereignty. The domain of what is legal (i.e. acceptable) is always under negotiation as agencies push for lesser regulations in the migration industry. They also test territorial jurisdiction when they are made to observe local laws seeking to apply to mobile sovereign subjects (i.e. citizens). These laws then "leak" into the international domain. Agencies push the boundaries of legality in a dialectic relationship with state apparatuses. They play a strategic

game of cat-and-mouse with authorities, prompting new regulations to plug loopholes. When new rules are in place, a temporary truce is reached until conditions dictated by the need to compete and survive in the market prompt agencies to once again test the limits of the law. The cat-and-mouse game is “agonistic”, in the Foucauldian sense because the strategic battle between the two opponents is productive. The game transforms legality into illegality and vice versa. One respondent claims, the reason why agencies charge so much is because they know the rules are meant to trip them. Once this happens they need enough money to satisfy rent-seeking government officials. The sovereign’s law-making powers create law-breakers, prompting new regulations, a new policy environment and so on. The cycle then repeats.

For example, the Philippines’ complex migration bureaucracy prompts agencies to play fast and loose with the law, to “bend some rules” and “navigate” around “walls” put up by regulatory bodies. Agencies compete over limited markets of labour supply and employment demand. Complying with rules significantly diminishes competitive advantage especially because illegal and unlicensed agencies also go for the same labour and employment pools. The common complaint is that the government is not doing enough to police and prosecute illegal recruiters and that it is turning a blind eye to foreign placement agencies (FPAs) setting up shop in the Philippines. All these other players are of course eating into their market share without the cost of rule compliance. On top of the added expenses incurred by proper documentation, the most significant cost is the length of time to deploy. Going through the bureaucratic grind can take as long as two months. Unlicensed agencies can deploy in a week or less. This means of course that workers leave the country *hubad* or “naked”. They are not recorded in the POEA, and do not have access to various government social security instruments. They do not have skills and language training, no medical certification, no skills assessment and no pre-departure orientation seminar (PDOS).

In the extreme, the government exercises full sovereign control and issues a full deployment ban—stopping its citizens from crossing the border. For example, Indonesia’s deployment ban to Malaysia was prompted by the latter’s perceived failure to meet the terms of the Memorandum of Understanding (MOU) governing the placement of domestic workers. The “freeze” lasted two years and was officially lifted in 2011. During the ban, Malaysia’s job performance (JP) visa system was abused. The JP visa system was meant for foreign professionals and other skilled workers to try their luck in Malaysia’s labour market. An NGO worker estimated that 60,000 JP visas were issued to domestic workers who came in as tourists.

The Philippine government’s imposition of a $400 USD minimum wage for all Filipino migrant domestic workers was originally meant to drastically reduce and eventually stop deployment overseas. Industry insiders claimed that no employer would pay that much money for a “maid”. What looked on the surface to be a positive measure—a de jure if not de facto minimum salary—had unexpected results. Initially there was a drop in deployment from 91,412 in 2006 to 47,877 in 2007. However, the figure had gone back up to 96,583 in 2010 (CMA, 2011, p. 9). The demand for workers from overseas was constant, while domestic supply was

limited. There was little incentive for agencies to comply with the ban and weak enforcement meant that rule breakers were not caught and punished.

Jakarta-based agents also complained of semi-illegal and illegal agencies. These were ones who leased a registered agency's license to operate. They were fly-by-night operators who had the capacity to pay field recruiters more for each prospective migrant because they did not have significant overhead costs. In the Indonesian case, another layer of competition came with *calos* or field recruiters. These were free agents who are not formally employed by agencies based out of Jakarta and other big cities. Officially, *calos* could bring a prospective migrant domestic worker (TKI) to more than one agency. In practice, *calos* would register the same person under different names so that he could bring her to different agencies and solicit the highest price. The Indonesian government had been trying to regulate this highly variable and mobile sector. It has been trying to professionalise the ranks by making them register, acquire identification cards, provided them official training, and to sign at least a one-year contract with a single recruitment agency.

While agents might complain about government's conflicting regulations and even incompetency, they must nevertheless maintain a working relationship. Pak Netro, a mid-level manager of a big Jakarta agency/training centre, described working with government as a necessity. In case of any problem, government could help. I met Pak Netro in a bureaucrat's office. The bureaucrat facilitated my access to Pak Netro and his agency. Pak Netro was in this bureaucrat's office at least once a week, he said. He was given a table from which to work for a few hours. Pak Netro also cultivated a relationship with heads of local governments in villages, from which they source workers.

Manila recruiter Kevin Gomez was proud of his ability to navigate the local government bureaucracy to recruit in the provinces. Agencies needed to secure an SRA permit from government (POEA) to conduct recruitment outside of the capital region. The agency needed the assent of the local PESO facility (Philippine Employment Service Office) and the local government. Once the mayor's office had released an approval letter, the agency could commence to advertise on the local radio, TV channels and newspapers. Kevin said these ad venues were not always effective. He preferred putting up tarpaulins and posters at the municipal town hall where there was a lot of foot traffic. Occasionally, he distributed flyers to *barangay* halls—the smallest administrative unit in the Philippines. His level of access to potential recruits was effectively regulated by how good were his relationships with local gatekeepers.

The relationship between the sovereign and recruitment agencies is one of uneasy partnership marked by periods of rivalry, co-optation and cooperation. A dialectical relationship between lawmakers/enforces and subjects of regulation develops in which practices of breaking and/or circumventing the law give birth to new ones. Illegality spurs more legality and recruiters tread the line between. This ultimately expands the scope of government by the sovereign with consequences as absurd as the Philippine government requiring agencies to set up Facebook accounts as a means of surveillance, for example.

At this stage, agencies also reveal how they tread the space between legality/illegality amidst often conflicting policies states try to enact across sovereign jurisdictions. They portray themselves as risk-taking entrepreneurs who must compete with local, illegal and foreign agencies for sources of supply (workers) and demand (employers) in Southeast Asia's domestic worker labour market. They evoke an entrepreneurial spirit demanding a minimum of regulations, the removal of a ceiling on profits, and letting market forces dictate prices (of recruitment fees and domestic worker salaries). In practice, however, agencies alternately cooperate or thwart the government bureaucracy to gain leverage versus competitors both local and foreign.

3.6 Conclusion

Recruitment is not simply matching available workers to prospective employers. At this stage, it entails making the worker available to global labour markets, and selling the idea of working overseas. The markets for this category of worker in Southeast Asia is deregulated in the formal sense, as "supply chains" are not governed evenly, and suppliers located in different countries are bound only by national legal frameworks and non-binding memoranda of agreement/understanding. Recruitment practices in both sending and destination countries continuously negotiate with or openly transgress sovereign power in spaces where it is weak, or operate freely in those where it is absent, most notably in the private sphere. This is a dialectical relationship, as repeated treading of legality provokes a sovereign response and the law seeks to expand into spheres previously unregulated. Meanwhile market forces, embodied by recruiters, continue to push for lesser regulation in the quest for greater market shares, profit and sources of labour supply and demand.

To complete the migrant trajectory in the first instance, to survive and then repeat the experience on a second contract or another destination country, needs more than the application of sovereign interdiction or disciplinary mechanisms. What guarantees the reproducibility of this system is the sourcing of domestic workers who will learn to effectively govern themselves, i.e. to be risk-taking entrepreneurial subjects with the right attitude in facing uncertain and insecure work conditions overseas.

The "conduct of conduct" of a prospective migrant is shaped by various actors that facilitate her deployment. These practices include the exercise of pastoral care by state apparatuses and recruitment agents, implemented through disciplinary institutions that imitate technologies found in schools, factories and the prisons. In recruitment, applicants take the passive form of the student who is filled with knowledge by various instructors—in pre-departure orientations, in training centres, in agencies and, eventually, in the receiving country household.

Processes of *assujétissement* or subjectification as practiced by nearly all actors (officials, recruiters, instructors and even other prospective migrants, and their families), predominantly underscore the migrant's economic identity—the breadwinner whose sole purpose for migrating is to work, remit and eventually go back home.

This same identity is implored whenever the migrant exhibits doubt about her capacity to complete the migration cycle. Her economic identity is specifically constituted as, firstly, human capital—an "abilities-machine" which can endlessly produce value not only for herself, but for businesses that support and facilitate her migration. Secondly, she is also a biopolitical subject whose reproductive labour contributes to the vitality of the population in the receiving country.

References

Ambito, J. S., & Banzon, M. S. L. (2011). *Review of Philippine migration laws and Regulations: Gains, gaps, prospects* (Working paper 2011–37). PIDS Discussion Paper Series. https://www.econstor.eu/handle/10419/126853

Antona, L. (2023). 'Cute face and quiet … but her look don't match her personality': Commodifying flesh, shaping labour expectations and domestic workers' treatment in Singapore. *Transactions of the Institute of British Geographers, 48*(2), 425–438. https://doi.org/10.1111/tran.12589

Awumbila, M., Deshingkar, P., Kandilige, L., Teye, J. K., & Setrana, M. (2018). Please, thank you and sorry—Brokering migration and constructing identities for domestic work in Ghana. *Journal of Ethnic and Migration Studies, 0*(0), 1–17. https://doi.org/10.1080/1369183X.2018.1528097

Awumbila, M., Teye, J. K., Kandilige, L., & Chambel, M. (2017). Understanding recruitment agencies in migrant domestic work in Ghana: Exploiters or facilitators? https://opendocs.ids.ac.uk/opendocs/handle/20.500.12413/14926

Bakan, A. B., & Stasiulis, D. K. (1995). Making the match: Domestic placement agencies and the racialization of women's household work. *Signs: Journal of Women in Culture and Society, 20*(2), 303. https://doi.org/10.1086/494976

Bautista, J. (2015). Export-quality martyrs: Roman Catholicism and transnational labor in The Philippines. *Cultural Anthropology, 30*(3), 424–447. https://doi.org/10.14506/ca30.3.04

Callon, M., & Muniesa, F. (2005). Peripheral vision: Economic markets as calculative collective devices. *Organization Studies, 26*(8), 1229–1250. https://doi.org/10.1177/0170840605056393

Chang, K. A., & Groves, J. M. A. (2000). Neither "saints" nor "prostitutes": Sexual discourse in the Filipina domestic worker community in Hong Kong. *Women's Studies International Forum, 23*(1), 73–87. https://doi.org/10.1016/S0277-5395(99)00088-6

Chang, K., & Ling, L. H. M. (2000). Globalisation and its intimate other: Filipina domestic workers in Hong Kong. In M. H. Marchand (Ed.), *Gender and global restructuring: Sightings, sites and resistances* (pp. 27–43). Routledge.

CMA. (2011). *Working paper on overseas migration 2011*. Center for Migrant Advocacy. https://centerformigrantadvocacy.com/wp-content/uploads/2012/06/working-paper-on-overseas-migration-2011.pdf

de Regt, M. (2009). Preferences and prejudices: Employers' views on domestic workers in the Republic of Yemen. *Signs, 34*(3), 559–581. https://doi.org/10.1086/593330

Encinas-Franco, J. (2016). Filipino women migrant workers and overseas employment policy: An analysis from women's rights perspective. *Asian Politics & Policy, 8*(3), 494–501. https://doi.org/10.1111/aspp.12269

Eversole, R., & Shaw, J. (2010). Remittance flows and their use in households: A comparative study of Sri Lanka, Indonesia and the Philippines. *Asian and Pacific Migration Journal, 19*(2), 175–202. https://doi.org/10.1177/011719681001900201

Foucault, M. (1978). *The history of sexuality: Volume I an introduction*. Pantheon Books.

Foucault, M. (1982). The subject and power. *Critical Inquiry, 8*(4), 777–795.

Foucault, M. (2007). *Security, territory, population: Lectures at the college de France 1977–1978*. Palgrave Macmillan.

Gammage, S., & Stevanovic, N. (2018). Gender, migration and care deficits: What role for the sustainable development goals? *Journal of Ethnic and Migration Studies, 45*(14), 2600–2620.

Ho, E. L.-E., & Ting, W.-C. (2023). Geographies of transnational domesticity: Migration risks, intersectional disadvantage, and mitigation strategies by foreign domestic workers from Myanmar. *The Professional Geographer, 75*(1), 145–154. https://doi.org/10.1080/00330124.2022.2081222

HOME. (2014). *Position paper on the prevention of human trafficking bill*. Humanitarian Organization for Migration Economics. https://static1.squarespace.com/static/5a12725612abd96b9c737354/t/5a1fcec724a694adca7d6b77/1512033997337/Position_paper_on-the-Prevention-of-Human-Trafficking-Bill.pdf

ILO. (1935). The employment of women and children in domestic service in Ceylon. *International Labour Review, 32*(6), 808–816.

ILO. (1970). *The employment and conditions of domestic workers in private households (D.11 1970)*. ILO.

Istianah, I., & Hekmatyar, V. (2023). Insurance as a form of social protection for women Indonesian migrant workers. *Indonesian Journal of Social Work, 2*(1).

Killias, O. (2018). *Follow the maid: Domestic worker migration in and from Indonesia*. Nordic Institute of Asian Studies.

Liebelt, C. (2011). On gendered journeys, spiritual transformations and ethical formations in diaspora: Filipina care workers in Israel. *Feminist Review, 97*(1), 74–91. https://doi.org/10.1057/fr.2010.32

Loveband, A. (2004). Positioning the product: Indonesian migrant women workers in Taiwan. *Journal of Contemporary Asia, 34*(3), 336–348.

Lyons, L. T. (2005). Embodying transnationalism: The making of the Indonesian maid. In *Corporeal inscriptions: Representations of the body in cultural and literary texts and practices* (pp. 171–185). Nicolas Copernicus University Press.

Magalit-Rodriguez, R. (2010). *Migrants for export: How the Philippine state brokers labor to the world*. University of Minnesota Press.

Mahler, S., & Pessar, P. (2006). Gender matters: Ethnographers bring gender from the periphery toward the Core of migration studies. *International Migration Review, 40*(1), 27–63.

Marti, G. (2018). The effects of multilevel governance on the rights of migrant domestic workers in Singapore. *Journal of Ethnic and Migration Studies, 45*(8), 1345–1360.

Mense-Petermann, U. (2020). Theorizing transnational labour markets: A research heuristic based on the new economic sociology. *Global Networks, 20*(3), 410–433. https://doi.org/10.1111/glob.12260

Mense-Petermann, U., & Schwenken, H. (2022). The analytical capacities and "blind spots" of the market concept in Analyzing cross-border labour migration. In *In search of the global labor market* (pp. 145–161). Brill.

Migrant Forum in Asia. (2014). *Joint and solidary liability of recruitment/placement agencies with the principal employer under Philippine laws* (Policy Brief 11; pp. 1–8). Migrant Forum in Asia. https://mfasia.org/migrantforumasia/wp-content/uploads/2015/06/policybrief_jointand-severalliability_winter2014.pdf

Ministry of Manpower, Singapore. (2021). *Employing a migrant domestic worker: Practical advice for anyone hiring an MDW*. Ministry of Manpower, Singapore. https://www.mom.gov.sg/-/media/mom/documents/publications/guides/your-guide-to-employing-a-mdw.pdf

Näre, L. (2012). Moral encounters: Drawing boundaries of class, sexuality and migrancy in paid domestic work. *Ethnic and Racial Studies, 37*(2), 363–380. https://doi.org/10.1080/01419870.2012.729669

National Statistics Office. (1997). *Survey on overseas Filipinos 1993–1995*. National Statistics Office.

Nyberg–Sørensen, N., Hear, N. V., & Engberg–Pedersen, P. (2002). The migration–development nexus: Evidence and policy options. *International Migration, 40*(5), 49–73. https://doi.org/10.1111/1468-2435.00211

Palmer, W. (2016). *Indonesia's overseas labour migration programme, 1969-2010*. Brill. https://brill.com/display/title/33687

Parreñas, R. S., Kantachote, K., & Silvey, R. (2020). Soft violence: Migrant domestic worker precarity and the management of unfree labour in Singapore. *Journal of Ethnic and Migration Studies, 47*(0), 4671–4678. https://doi.org/10.1080/1369183X.2020.1732614

Philippine Statistics Authority. (2023). *2022 overseas Filipino workers (final results)* (2023–321; p. 7). Philippine Statistics Authority. https://psa.gov.ph/system/files/iesd/Special%20Release%20on%202022%20Overseas%20Filipino%20Workers.pdf

Pickbourn, L. (2016). Remittances and household expenditures on education in Ghana's northern region: Why gender matters. *Feminist Economics, 22*(3), 74–100. https://doi.org/10.1080/13545701.2015.1107681

Rahman, M. M., & Lian, K. F. (2009). Gender and the remittance process: Indonesian domestic Workers in Hong Kong, Singapore and Malaysia. *Asian Population Studies, 5*(2), 103–125.

Rudnyckyj, D. (2005). Technologies of servitude: Governmentality and Indonesian transnational labor migration. *Anthropological Quarterly, 77*(3), 407–434. https://doi.org/10.1353/anq.2004.0045

Semyonov, M., & Gorodzeisky, A. (2008). Labor migration, remittances and economic Well-being of households in The Philippines. *Population Research and Policy Review, 27*(5), 619–637. https://doi.org/10.1007/s11113-008-9084-7

Shamir, R. (2008). The age of responsibilization: On market-embedded morality. *Economy and Society, 37*(1), 1–19. https://doi.org/10.1080/03085140701760833

Strobl, S. (2009). Policing housemaids: The criminalization of domestic Workers in Bahrain. *The British Journal of Criminology, 49*(2), 165–183. https://doi.org/10.1093/bjc/azn071

Susilo, S. (2014). Remittances of the Indonesian migrant workers on the improvement of family welfare in their home village. *Asian Journal of Humanities and Social Sciences (AJHSS), 2*(1), 61–67.

Tan, E. (2010). Managing female domestic workers in Singapore: Economic pragmatism, coercive legal regulation, or human rights? *Israel Law Review, 43*(1), 99–125.

Varman, R., Al-Amoudi, I., & Skålén, P. (2023). Workplace humiliation and the organization of domestic work. *Organization Studies, 44*(1), 01708406231157034. https://doi.org/10.1177/01708406231157034

Verma, A. (2011). Black magic women: On the purported use of sorcery by female foreign domestic Workers in Singapore. In H. Bonavita (Ed.), *Negotiating identities: Constructed selves and others* (pp. 25–50). Rodopi.

Vosko, L. (2000). *Temporary work: The gendered rise of a precarious employment relationship*. University of Toronto Press. https://utorontopress.com/9780802083340/temporary-work

Williams, C. P. (2008). Female transnational migration, religion and subjectivity: The case of Indonesian domestic workers. *Asia Pacific Viewpoint, 49*(3), 344–353. https://doi.org/10.1111/j.1467-8373.2008.00382.x

Yeoh, B. S. A., & Huang, S. (1998). Negotiating public space: Strategies and styles of migrant female domestic workers in Singapore. *Urban Studies, 35*(3), 583–602. https://doi.org/10.1080/0042098984925

Yeoh, B. S. A., & Huang, S. (2009). Sexualised politics of proximities among female transnational migrants in Singapore. *Population, Space and Place, 16*(2), 37–49.

Yuen Xin Er, S., & Paul, A. M. (2020). The workplace-entitlements knowledge of Filipino and Indonesian domestic Workers in Singapore. *Journal of Immigrant & Refugee Studies, 18*(1), 113–131. https://doi.org/10.1080/15562948.2019.1571657

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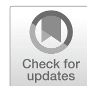
Chapter 4



Training, Packaging and Commodification

> Never ask to change employer. As long as they do not hit you, give you food and you receive your salary, do not ask to change employer or ask to go home.
>
> —Instructor, Jakarta training centre

Literature on training centres tend to emphasise disciplinary power at work (Killias, 2009; Liang, 2011). They highlight immobility and are likened to prisons. But the production of a "quality maid" entails more than discipline. A quality maid is a biopolitical and entrepreneurial subject. As biopolitical subjects, training constitutes domestic workers as mobile reproductive labour, plugged into the social reproduction of their host country's population. As entrepreneurial subjects, training converts domestic workers into units of human capital—a source of income for families, economies, local and foreign recruitment agencies and local and foreign governments. While immobility and discipline create the fundamental conditions of domestic worker migration, the assembly of an empowered, entrepreneurial subject makes possible not only the completion of her employment contract but the repeated deployment to different migrant destinations—perpetuating overseas work as a permanent means of employment and a way of life.

The demand for a "quality maid", specifically from major East Asian receiving countries, has opened up the possibility for upskilling, and hence, the diversification of the industry to include training centres. Training centres, which may be affiliated to recruitment agencies, or operate as a separate business, provide language and skills training before deployment. Training is a process which can last as long as three months, depending on the requirement of destination countries. Training transforms bodies as mobile human capital, train women to produce on-demand consumable care, and inculcate technologies of the self to not only survive, but even excel in the performance of migrant domestic work. The period of physical and temporal immobility is needed to properly invest and create value in bodies. This process of capitalisation is as important, if not more, than actual practical and linguistic skills acquired. Time and efforts spent in training transforms the domestic worker into units of biopower, or the "means of reproduction" (Murphy, 2012). While on the one hand, her remittances help sustain the life of family left behind, her manual labour reproduce her employer's household while her caring labour reproduces inhabitants within.

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4.1 Immobility and Uncertain Prices

Ensconced in Bekasi, one of Greater Jakarta's industrial suburbs, PT[1] Jalan Putra[2] housed women from all over Indonesia—East Java, Sumatra, and as far as West Nusatanggara. Field recruiters, scour Indonesia's hinterlands for women to undergo training for overseas domestic work. Training is, in practice, required before deployment to its main markets in the Asia Pacific—Taiwan, Hong Kong, Singapore and Malaysia. And this training centre was one among many in this area. From outside the dusty road, the walls were about fifteen feet high, the main gate about ten. The gate was solid green, manned 24 hours a day, 7 days a week by security stationed at the nearby guardhouse. Upon entry, there were two massive buildings. One housed the main administrative office and two floors of classrooms.

The other building consisted of cavernous halls. The bottom floor was where *praktek* or skills classes were held. Cribs, makeshift hospital beds, a kitchen with cooking implements, a bath tub, sleeping beds and a pile of play objects. They were mostly plastic vegetables, fruits and other food items for naming and vocabulary exercises. The top floor was stacked with rows upon rows of double beds. From the yard, language drills were recited with gusto, one in English, the other in Mandarin. Inside one of these classrooms, the instructor asked one of the students to read the PT's rules and regulations. A slight young woman sprang from her seat and read aloud the words posted on the left wall:

1. Obey all the rules written in the dormitory and the classroom.[3]
2. Do not leave the door open.
3. You cannot accept male guests or your husband.
4. You have to take care of all the belongings in the dormitory.
5. You cannot have any relationship with any male.
6. Drugs are not allowed in the dormitory and the classroom.
7. It is not allowed to take a nap except when there is permission.
8. You cannot just leave clothes anywhere.
9. Obey the rules of government.
10. There will be punishment for those who break the rules.
11. Ways to be a success with your employer:
    a. Have initiative
    b. Obey the employer's rule
    c. Go along with the employer
    d. Follow all the rules
    e. Keep on smiling, be friendly
    f. If you want to use the phone, please ask the employer

[1] PT means *Perseroan Terbatas* or limited liability company.

[2] Not its real name.

[3] Interpreted from Bahasa.

Fig. 4.1 Cantonese class

The litany ended with "Good luck on your performance." The reader then returned to her seat, and the class proceeded (Fig. 4.1).

"Training" includes not only repetitive, often monotonous, performances of household chores but also lessons on the correct conduct and attitude towards their work, their place and country of employment and their employers. This stage in the whole migration process is meant to produce, firstly, bodies able to perform the tasks of cooking and cleaning; secondly, the more affective task of caring for children and the elderly; thirdly, the right mind-set to withstand isolation and immobility; and lastly, the correct behaviours and attitudes expected of a quality domestic worker.

The six training centres I visited in the Philippines and Indonesia were all organized as schools. There were classrooms, curricula, teacher-trainers, and a principal or administrator. At the end of the process, the student-trainees needed to pass written and practical exams, after which they were certified by government officials and then were ready for "export." Training centres were spaces of discipline and regimentation where students were literally held for long periods of time. The length of their stay depended on prior experience and the requirements of the receiving country. Taiwan had the longest requirement of 600 hours.[4] This meant that training for those bound for Taiwan could last up to almost three months. Olivia Killias describes

[4] Formally, the Taiwanese market requires 600 hours of training for new hires from Indonesia, Singapore and Hong Kong—400 hours and Malaysia 200. The Philippines officially requires its workers to undergo 216 hours or 21 days of training, per TESDA regulations. In practice, however, these targets are not always met. Other factors in the speed of deployment include the urgency of

them as "total institutions," per Erving Goffman (Killias, 2018, p. 108). Examples of the latter are army barracks, ships and boarding schools. Liang similarly notes that the training program she observed emphasized the "military culture" of submission and discipline (Liang, 2011, p. 1823).

The Indonesian centres I visited did not allow students off of centre premises. However, they were allowed weekly visits from family. Because many of these women hail from far-away provinces, frequent visits were not only impractical but expensive. The Philippine centres I visited, on the other hand, were not only more easily accessible to the general public but also allowed students out after classes were over and on weekends. The difference between the two sending countries may have to do with differences in recruitment practices. Immobility is not so crucial in the case of the two centres I accessed in Manila because students usually paid fees up front.[5] If students decided to discontinue training mid-way, the centre did not incur direct monetary loss. If the training centre was also operated by a recruitment agency, then a prospective worker deciding not to continue migration only represented a loss of income opportunity.[6]

In Indonesia, students did not usually pay fees. The cost was shouldered by the centre to be reimbursed later when workers had been deployed and begin to receive their salaries. These training centres had an incentive to make sure that their wards completed the whole migration cycle so they could get a return on their investment. A student running away in the middle of training meant not only a loss of income opportunity, but a loss of money already spent on her training, food and lodging.

A respondent who owned and operated a recruitment agency in Kuala Lumpur, and who sourced from the Philippines, compared Indonesia and the former:

> Oh, the good thing we found out with Indonesia, unlike [the] Philippines is, you can lock the girls up, you know, which makes investment in training a better thing… So there is no running away, no changing of mind, no backing out. And this is good you know, because you can't afford to invest in training… That's why they are able to finance them one hundred percent. But in the Philippines, you can't even keep them for twenty-four hours. Can you imagine? They will file a complaint with the POEA[7] that you refused to let them out.

Immobility is the basic condition in turning workers into units of human capital whose corporeality could literally be turned into cash. The promise of delivering a domestic worker to receiving country markets is represented by their

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need by employers which would sometimes cut the training period short. I encountered one student in Jakarta who stayed in the centre premises for 7 months because she was difficult to 'market.'

[5] Fees are determined by the market—with some centres charging as low as PhP3,500 per week to as high as PhP30,000.

[6] As the Philippines enforces a no placement fee policy, foreign employers shoulder recruitment costs (officially). In practice, the worker may still be charged a fee once she arrives at her destination country. In Singapore for example, the local law mandates that Singaporean agencies may charge the worker a fee equivalent to 2 months of her salary.

[7] The Philippine Overseas Employment Administration is the official agency that exercises supervisory power over recruitment agencies.

biodata—which can fetch as much as 6,000 Malaysian Ringgit.[8] The biodata contains the worker's particulars, a photo, family background, medical history, task-based competencies and past work experience either in the home country or overseas. This piece of paper is traded and changes hand even before the actual person makes the transit. If a trainee were to leave the centre before the completion of her training, this would mean the inability to realise the business transaction between supplier and the receiving country agent (Fig. 4.2).

In Kuala Lumpur, I met Mr. Nalawangsa, who worked for an agency association in Malaysia. He said that he was very busy and had a lot of pressure from the government, members of the association, and visitors like me. He complained about the price for bringing domestic workers from Indonesia. Based on "market forces," the total fee should have been between 10,000 and 11,000 RM.[9] He was unhappy with the latest round of negotiations between the two countries. The problem was that the lower figure was proposed by a rival association. It was not Malaysians' fault the prices were so high. Indonesians dictated the prices. If suppliers charged so much, there would not be much left over for him, he said. And even though Malaysia had other government-approved supplying countries,[10] Malaysians preferred Indonesians because of the similar culture, language and proximity. He complained about how his Indonesian counterparts "cheat". Some of his association's members had reported losing 100,000 to 300,000 RM:

> [For example], we as a local agent. You are the Indonesian. You send me the biodata. One biodata – 6,000. Ten biodata – 60,000. I have to pay you up front maybe 20,000 or 30,000 in order for you to recruit – like a deposit. After we pay you, you give me the biodata. It's only a piece of paper. If it's good, it's alright. If you're not good, maybe you have five biodata. You sell to five agencies. And you collect money. Then after that they create a problem. Oh I can't proceed with the business. I can't provide because the girl is going back to *kampong*, going back to the village. You will delay, delay, delay. It's my money. Unfortunately some of them – disappear. So I lost 30,000.

SKILL: (1=Well 2=Satisfactory 3=Little 4=No Knowledge)

	How well can you .... (Answer 1, 2, 3 or 4)	Any Experience (Plenty / Little / No)	Willingness (Yes / No / Prefer Not)
1. cook?			
2. wash clothes?			
3. iron clothes?			
4. clean the house?			
5. look after babies?			
6. look after children?			
7. look after the sick?			
8. look after the old?			

Fig. 4.2 Biodata, agency in Kuala Lumpur

[8] 2013 figures.

[9] Malaysian Ringgit. 2100 to 2300 USD.

[10] Cambodia, the Philippines, Thailand, Sri Lanka, Laos, Nepal and Vietnam.

Mr. Usman represented a non-governmental organisation working for the interests of Malaysian household employers. This group was formed out of the frustrations over supply problems and quality of workers. He said that the root cause seemed to be the way Indonesia recruited its domestic workers—that was, relying on the field recruiter system. The processing and training of workers were "non-variable," but this system depended on the whims of field recruiters who brought applicants from the Indonesian countryside. The amended 2011 Memorandum of Understanding (MOU) between the two countries was a compromise after a two-year deployment ban by Indonesia, triggered in part by reports of abuse. The MOU failed to solve the supply shortage and workers were coming in illegally. It pegged recruitment fees at 4511 RM,[11] 2711 of which was to be shouldered by the employer, and the rest—by the worker. Despite this, prices went as high up as 16,000 RM.[12] As a consumer advocate, he said that the pricing system had to be transparent. But it was "a supplier's market, we are at their mercy." I would speak with Mr. Usman two weeks later, after meeting with stakeholders from the migration industry, an NGO and the manpower ministry. They were negotiating the fees and the government was looking at 8000 RM[13] after consulting with relevant stakeholders. In 2014, the recruitment fees for Filipino domestic workers was estimated between 6000–8000 RM. Indonesians' fees were between 4000–8000 RM. In any case the MOU served only as a guideline and cannot be formally enforced (Kassim et al., 2014, p. 250).

Xavier Go worked for an non-governmental organization advocating for migrant rights in Malaysia. He thought 8000 RM was unreasonable, especially because it included "unofficial expenses." For every step of recruitment, some kickback had to be paid to someone, somewhere. If a field recruiter were to source someone from a village in Lombok for example, he would have to make some form of payment to the worker's parents or husband or the local informal agents such as the school principal or the village head (Lindquist et al., 2010, 2012). The recruiter could be working for an agency either in Malaysia directly (which was not legal) or in a city in Indonesia. The exorbitant amount had other consequences as well. When employers must shell out this much money, they had no choice but to protect their "investment." This meant that the worker will have to stay in their employ long enough to work off the part of the fees she was responsible for, and so the employer would tend to do everything to prevent her from running away, whatever may be the work conditions. This meant holding on to her passport and not letting her out of the house for days off even if the MOU clearly stipulated against such practices.

Immobility is thus key in extracting value from the worker once she has been placed in the household. Because her employers have invested a considerable amount to acquire her, a return of investment—which has already been cashed in by her recruiters—falls squarely on her shoulders. Combined with other exacerbating factors, such as racial discrimination, devaluation of domestic work and lack of

[11] Malaysian Ringgit. Equivalent to $1700 SGD.

[12] $972 USD.

[13] Around $3400 USD.

legal protections, there is little to stop employers from quickly recouping value for their investment—which meant long work hours and no days off.

The ILO estimates that there are between 200,000 to 300,000 migrant domestic workers in Malaysia (ILO, 2023, p. 29). While the country has increasingly diversified its sources, Indonesia still provides about 80 percent of these workers. The "determinants" of cost in this labour supply chain are highly variable, and where demand may sometimes exceed supply. The informal relationship between field recruiters who source from the hinterlands, and the big recruitment agencies in Greater Jakarta, makes it difficult to fix prices. Because Malaysia is not as attractive as other destination countries which pay higher wages (e.g. Taiwan or Singapore), recruitment agencies "are in fierce competition with each other (Killias, 2018, p. 49)," and field recruiters can dictate the amount of their commission. There are also the unseen costs of petty corruption from recruitment at the village-level to when the worker is handed over to training centres in the city (Lindquist, 2012, p. 72; Palmer, 2016, p. 1).

The MOU provides general guidelines, e.g. that the worker's passport should not be confiscated, that she should be paid a monthly salary, and that she is entitled to one rest day per week. The amendment in 2011 put migration costs in writing.[14] The employer would foot the Malaysian agencies' bill, while the worker would eventually pay for her accommodation and training costs, apart from the Indonesian agency's cut. Two years later, this "cost structure" was still in dispute. The volatility in prices in part also derives from the sheer number of not only market but even regulatory competitors. Indonesia's own migration bureaucracy has turf wars over the power to license recruitment agencies (Karim, 2017).

Because the Philippines has officially declared a no-recruitment fee policy for Filipino domestic workers,[15] the costs are borne by employers on paper. In practice, however, the employer in the destination country passes these costs back onto the worker, who is now outside the Philippine jurisdiction. This means that the worker may not receive a salary for months from the beginning of her contract. Moreover, the worker would of course have to pay for her training and other ancillary costs which vary depending on the destination (Debonneville, 2021, p. 12).

In sum, the "costs" of migration are not only the value that could be generated (i.e. paid for by someone) but is the financialized equivalent of risk. And the backstop, i.e. the main guarantor of the entire value chain, is the domestic worker who must pay the fees, and work off her debts during her two-year contract. What should be private costs borne by destination households is ostensibly subsidised by the migrant. Arguably, these costs could also be subsidised by the state as a matter of public policy, but they are not.

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[14] "Protocol Amending the Memorandum of Understanding Between the Government of the Republic of Indonesia and the Government of Malaysia on The Recruitment and Placement of Indonesian Domestic Workers", Accessed 14 January 2023 https://apmigration.ilo.org/resources/mou-between-government-of-the-republic-of-indonesia-and-the-government-of-malaysia-on-the-recruitment-and-placement-of-indonesian-domestic-workers.

[15] Republic Act No. 10361, Sec. 13 (2012).

4.2 Healthy, Hygienic Bodies

Good Quality Training Centre[16] was located in the heart of *Intramuros*, the old walled city of Manila. The gate opened out to the main road, where cars and other modes of transportation drove by. There was a huge billboard near the entrance, perhaps ten feet high. It stated the training centre's vision[17] of "household services". Some of the expectations from the ideal graduate included obedience, morality, capacity to care and values required to overcome hardship—e.g. "enduring calmly without losing self-control" (Fig. 4.3).

From the entrance, flight of stairs lead to the main premises. Along the way, photos of former students are showcased in different classes—cooking, using washing machines, sitting in lectures. They were all smiling and looked to be in a good disposition. When one entered Good Quality Training Centre, one was supposed to think it was a place with a purpose, one where the Virgin Mary, Christ the Redeemer and Baby Jesus stood guard, and where students seemed happy (Fig. 4.4).

At the table-setting classroom, there were 30 students in a space of roughly 50 square meters wide. Most were in jeans, jogging pants and t-shirts. The ceiling was low, illuminated by two dim fluorescent lights. In late March, the warmth of the

Fig. 4.3 Mission and vision, training centre in Manila

[16] Not its real name.

[17] "Mission and vision" statements are common fixtures in many Filipino classrooms.

Fig. 4.4 Religious iconography, training centre in Manila

room was nearly oppressive. There were two instructors, male and female, both "ex-abroad.[18]" In front were two students demonstrating the "Russian Service." While the latter would go through the motions, both instructors asked questions about where were they from, if they were married or had children. The exchange was in English, and the female instructor was careful to correct her student's grammar. As one server put a table napkin on the diner's lap, the female instructor said "proper body mechanics." The server pretended to pour soup from a bowl and the diner pretended to eat. The server then recited the canned script, "Are you done with your soup ma'am?" Students took their turn in the role play, one after the other. As each mistake was made, either instructor made the necessary correction, at times physically demonstrating the correct way to hold the cutlery, at what height. Spoons, forks and plates were identified, followed by both extemporaneous and canned exchange in English. From time to time, the instructors would correct students' body posture. "Do not slouch."

Over an hour and a half in, the female instructor said that there would soon be a break. Apparently, some students were ascribed the role of a "leader," not much different from a classroom beadle. The leader was to go upstairs to fix the chairs for another class. The leader was to tell Ma'am Amanda, the administrator, that they were about to go for a break. As students filed out, the female instructor opened her

[18]A terminology that refers to workers with experience overseas. In Indonesia, the term used is ex-TKI (Tenaga Kerja Indonesia—meaning Indonesian migrant worker).

table drawer and handed them back their mobile phones. They were not allowed in classes.

The last class for the day was bed-setting. "When you go abroad, your legs will be white but your knees will be dark.[19]" The lesson was highly technical and precise. This was the "fan fold" of the "flat sheet." There were many details to remember. The instructor said to make sure that the tag of the pillowcase was inside as one put the pillow in. "Where is the door?" Students pointed to the door. "The opening of the pillowcase should be facing away from the door…The pillow has no laterality, it can be positioned as you like…The feet should always be spread to always be alert." She advised her audience to be careful of their bodies, to pay attention especially to their backs. "Don't bow, because your back will hurt." Bed-setting will make you break sweat. Her students then took turns setting the two beds. "Both hands are busy…If you're stretched every day, of course you will get loose." At the unintended sexual innuendo, everyone laughed.

Time spent at Good Quality Training Centre was regimented and monotonous, punctuated by occasional levity. The casual banter and frequent jokes and laughter were normal, and, distinctly Filipino. The tedious performance of household skills was meant to habituate the body not only to the execution of vacuuming or bed-setting but to their daily, unchanging repetition. Aside from the frequent references to "body mechanics" and the proper use of the body, there was also a hint that one's body—it's health and good condition—was an investment.

All workers must undergo a medical exam before leaving (as required by the sending country governments) and upon arrival (as required by receiving country governments). Further, both the Philippines' Pre-departure Orientation Seminar (PDOS), and the *Pembekalan Akhir Pemberangkatan* (PAP),[20] emphasise the need to care for the body, to be aware of such things as sexually transmitted diseases and HIV. Training classes and pre-departure seminars also remind workers that they must make sure they have adequate meals, rest and sleep. Domestic work is physical work. The body is continually in motion, hanging clothes, running after a toddler or moving about an invalid's body to be bathed or cared for.

Bodies placed in households must not only be healthy (that is, productive) but also hygienic. The preoccupation with cleanliness assume the worker's racialized body as dirty and a possible source of disease (Constable, 2007, p. 105; de Regt, 2009, p. 570). Training centres then check for body odour and clean nails. Upon arriving in the destination country, agents also check the worker's body and belongings. Some employers even insist on their worker bathing more than once a day. A Singapore agent explained why Indian domestic workers were not so popular thus:

> I think the market is not receptive to Indians. I think there is a lot of prejudice for Indians. When people think about Indians they think about construction workers. They have all sorts of prejudice against body odour, level of hygiene and so on. You would not believe some of the questions they have – but are they clean? …And then [one] person told us – oh, but then you have to teach them all about hygiene right?

[19] Translated from Tagalog.

[20] Final departure dispatch.

While the body-machine must be productive, it cannot be *reproductive* (Yeoh & Huang, 2009). Workers in Malaysia and Singapore are required to take pregnancy tests every six months. Getting pregnant is a breach of the employment contract and is grounds for expulsion from the country. As such, bodies are not only required to be healthy and clean but also sterile, as a condition of employment. This may be why there is concerted effort to regulate workers' sexuality by government officials, recruiters and employers under the guise of morality, decency and keeping the dignity of the nation (Constable, 1997). The pre-departure orientations of both the Philippines and Indonesia send workers off with the mindset that they may be seen and treated as sexual objects, and that they should be mindful of courting unwanted advances, including sexual assault. This is a PAP instructor in Indonesia, coaching workers about to leave for Saudi Arabia:

> When your male employer rapes you, wait for your female employer to come back. It is likely she will send you back home. Sharia law says that if you get raped the rapist must pay a fine. When you get raped and your employer tries to send you home, try to go to the embassy. Don't call the agency because they tend to defend your employers more than you. Don't agree to be sent home until you get your rights. Shariah law is supposed to protect your rights. At the embassy make sure your problem is noted first, some document has to be written. You have to be brave enough to handle this. If you are not brave enough, no one can help you. Don't go home from the embassy until you get paid. If the employer is convicted of raping you then there is a fine - either the employer pays the domestic worker's salary for two years or there is a fine.

There are many other discourses meant to police domestic worker sexuality. There are ethnicities who tend to "steal husbands" and break up families (Bakan & Stasiulis, 1995; Chang & Groves, 2000). The irony is that this category of labour is meant to replace local women tasked with the social reproduction of the destination country's population, but is forbidden from reproducing themselves. As they dedicate their lives in service of a foreign household they themselves forgo the chance of starting a family. Those who are already married with children not only create care deficit in the sending country but also a "care drain (Lutz & Palenga-Möllenbeck, 2012)."

While she must continually produce care and service to her host family, she cannot herself be a recipient of care, especially sexual care. Maintaining harmonious balance within the household means the domestic worker must make sure that she does not pose a threat to the relationship of her female and male employers. She must make sure she is never seen as an object of her male employer's sexual interest. Needless to say, she is not allowed to have any romantic relationships (with others outside the household, either male or female). A Singapore recruiter said she felt it is her duty to make sure her Indonesian charge do not go astray:

> I tell them, look here, you are here to work. Ok? The foreign workers – they are also lonely. Ok? So, I'll them this – they will just seduce you ok, with these calling cards. It will start with – hello, miss, miss, what time? Just to create a small talk. So, I tell them – avoid them. So, I demonstrate, sorry ha? Can I just touch you? Ok, they will start with small conversation. Then they give you a calling card. And after that they will just you know, thank you miss ha? Thank you…and I said, look here. For ten dollars? You know? For twenty dollars? You make yourself as a sex slave? Right? You do not know the dangers.

For workers who are hired primarily to do household chores, the body must be disciplined not only because it must constantly be on the move, but that it must be also be sterile in the literal and reproductive sense. While she is a unit of biopower, shoring up the social reproduction of the host family, she herself must never reproduce. Her good health is an investment that would guarantee her being able to perform the physically-demanding household tasks. Sterility guarantees her continued employment. Her body is directed towards productive pursuits, and is discouraged from indulging in sexuality. One worked, one prayed, and one sent money back home.

4.3 Affective Production and the Conduct of Conduct

The production of the correct "internal states" (Hochschild, 1993) in recipients or consumers of emotional labour requires practices of care and emotion management. This is evident both in training centres and discourses of recruiters and government officials at all stages of migration. Raditya Surono, a key player in Indonesia's migration industry who claimed to have introduced the concept of domestic worker training to the manpower industry, likened his recruits to doctors, people who heal and bring happiness:

> I motivate them – they are [the] same as a doctor, a professor, [an] engineer. Why? The principle to make other people healthy from [being] sick…[comes] from feeling. You can see [in] every hospital, the [nurses] do not make an angry face. They smile. The people they take care [of are] happy. The sickness [is] gone. I say to the maid – everything you [do] at the house – is to make people happy in that house. You make them more healthy. Ok? The madam, the employer, the children. To make them happy.

Training in domestic work incorporates what has been termed "emotional labour". It is work that "requires one to induce or suppress feeling" to create the "proper state of mind in others" (Hochschild, 2012, p. 7). Hochschild's pioneering work shows how flight attendants must produce feelings of care and attention as part of service. What is being sold is not simply the transportation of passengers but the feeling of well-being while flying. This process of commodification is in-built in domestic work in so far as it is also regarded as care work. Domestic work—in its real-world constitution as observed in the recruitment, training and management of workers—requires emotional labour. The worker's capacity to manage her internal states is arguably one of the core skills one must acquire in training. An applicant or trainee must be *siap mental* or mentally ready (Prusinski, 2016). The educational aspect of training assumes two things, according to Prusinski—that the domestic worker is economically inferior, and that maltreatment is an effect of inadequate preparation. The assumption is that adequate training will reduce the likelihood of abuse. Being *siap mental* means being able to withstand the difficulties of life and work overseas.

Mr. Chong grouped and marketed his recruits in three categories—generalists (i.e. overall housework/cleaning), child-carers, and elderly-carers. He sorted them according to information gleaned during training (in a training centre he operates in Manila) and during interviews. Those who are deemed good with children are

generally young, bubbly and have good communication skills. With one client, Mr. and Mrs. Chong's recruits were hired to keep a wife company, so "she's not lonely" while the husband was away. This case was problematic in that the expectations of the employers exceeded those of the two young women they hired. The workers were not informed that they were supposed to dispense care on top of performing housework and preparing meals. They kept to themselves instead of talking with their female employer or keeping her company. But Mr. Chong thought that this was to be expected from every maid—that she should take interest in her employer and be "caring enough."

The "authenticity" of care or the extent to which a domestic worker should care is perhaps best illustrated by the line the employer and worker must tow in deciding whether the maid should be treated as part of the family or not (Arnado, 2013; Lin & Bélanger, 2012). Mr. and Mrs. Chong said that a household could choose from these "two models". If employers decided to treat her as family, then she was likely to abuse this position and forget her place. She would not be "professional." On the other hand, not treating her as family would remind everyone that her care was not genuine, that it was bought and paid for. As Bridget Anderson notes, here is where the nature of the domestic work, and indeed the ideal "quality maid," strains the fiction of Marxian labour power theory. It is practically impossible to separate care work from general household work as the two often intersect. When one is cooking for children, one also considers what is pleasurable for them to eat, wiping their face, cleaning up their dishes—not impersonal tasks. Belying the fiction of "family" as Anderson notes, is how the relationship can easily be terminated with the contract. Unlike real familial relations, there is no reciprocal obligation between the two (Anderson, 2000). Further, treating the worker like family displaces their identity as a worker, making it difficult to set boundaries to the worker's working time, resulting in long work hours (Barua et al., 2016, p. 12).

The worker is expected not only to produce positive emotions of care and to be *truthful* about it, but to suppress negative emotions, the most common of which is homesickness. In Indonesia's PAP, instructors urge workers not to cry or display emotions that would indicate being homesick. Government-mandated examiners have a checklist which they use to assess worker readiness before deployment. This checklist includes a section on "Developing Emotional Maturity and Motivation" which contains items such as "adjusting self-emotional management to the environment," "adjusting self-understanding and environmental understanding to the characters of the house owner and family members". Another section entitled "Developing Cooperation in Household Environment" includes "building the appropriate employment relationship with employer, family members and guests" and "avoiding negative body language." Another set of criteria for assessing elderly care services is "Giving the Elderly Company" which includes "identifying and chatting about exciting nostalgic memories," "discussing laughter and pain favouring the elderly," "offering to watch the favourite TV program of the elderly," and "talking about interesting and funny stories", among others.

The Philippine government similarly conducts an exam to test the readiness of workers. The exam is based on the core curriculum of the Technical Education and

Skills Development Authority (TESDA) for household service (Household Services NC II). Classes in accredited training centres are based on this government-set standard. One of the competencies expected from trainees is maintaining an "effective relationship with client/customers.[21]" One particular set of criteria describes in such technical and professional manner how a worker should maintain an effective relationship with her client:

Client requirements identified and understood by referral to the assignment instructions.
Client requirements met according to the assignment instructions.
Changes to client's needs and requirements monitored and appropriate action taken.
All communication with the client or customer is clear and complied with assignment requirements.

Couched in human resources jargon, the language in these government-prescribed checklists ultimately indicates meeting the needs and desires of the employer. From the point of view of migration bureaucracies, quality domestic workers should be tough, confident and adaptable but also have the "emotional maturity" to produce positive affects while in service. To exhibit these core values, trainees are reminded to keep smiling and to be polite. Politeness can be shown through greetings and paying attention to what the employer says at all times.

At Putra Jabung training centre, Ibu Mina, taught *etika* or ethics class. She said the most challenging aspect of her job was to "hone or shape the attitude of the student, the heart especially". Ethics class was a series of do's and don'ts. Do's had to do with enhancing the positive attitude of the worker towards her employer and her job. Don'ts were behaviours and feelings to avoid. "Think about your employers before you think about yourself" (Fig. 4.5).

To exhibit this core value, workers were reminded to keep smiling and to be polite. "Remember everywhere, any time, whoever it is…always greet them with a smiling face…And if the employer gets mad at you, just smile and apologise. Do not have a gloomy face." One was to maintain good hygiene, not to talk back to employers, and not to make any request from them. Good manners meant one was to ask permission for everything—when one had to go out to throw out the trash, leave the household, make phone calls, enter and exit a room, when one was going to eat, sit and sleep.

Ibu Mina said that one way to not show employers one was feeling homesick was to go to the bathroom and wash their face. And if the employer asked why they had red eyes, to say "Because of the soap…that comes to my eyes".

In another ethics class, the instructor coached one particular student on smiling:

> Oh give me a smile. I'm going to make you stand in front of the mirror and exercise this smile. Then after that, if you look gloomy – scold yourself. How do you look when you smile? And how do you look when you have a gloomy face? At 1:00PM I'm going to judge

[21] The language in this document reflects the Philippine government's push to professionalise domestic work, not only by renaming it as "household service" but by literally breaking down the components of the skills and practices involved and describing it in a highly technical language.

Fig. 4.5 Ethics class, training centre in Bekasi

> you. After a quarter of an hour if you smile, you will get a score of 80. If you look gloomy, a score of 50. You want 100? Smile. You miss your boyfriend? Tomorrow is Saturday, don't worry you can call him. Just keep on smiling ok?

Homesickness is a very common problem that is addressed by all respondents—from government officials to recruitment agents. Overt displays of sadness and constant crying are clearly not conducive to the overall wellness of the household. A good worker therefore maximises the production of good emotions and minimises negative ones, even at the cost of denying the truth of her own feelings. The regulation of emotions is constantly reiterated in Indonesia's PAP, where instructors urged the workers not to cry or display emotions that might show that they were homesick. Interestingly, Kuala Lumpur recruiter Mrs. Chong said that expressions of homesickness were not necessarily a bad thing. Responding to an employer-client who said that she did not want someone who cried so much, Mrs. Chong said it was good for girls to cry. If the worker did not feel homesick, then she must be a "very hard person". And who would entrust childcare to someone like that? Her husband, Mr. Chong, told clients that he would be "horrified" if he gave them a maid that did not feel homesick.

Some studies have shown that homesickness accounted for the highest cause of stress among migrant domestic workers (Lau et al., 2009; van der Ham et al., 2015). Apart from financial obligations, other stressors include marriage troubles, or matters to do with the children left behind. "Homesickness" is shorthand for the dissolution of many different things—the safety and protection of one's own community and kinship ties, the privileges of citizenship, and the ease of familiar faces and

places. Being homesick does not only mean displacement, whether literal or metaphorical, but the inability of the worker, let alone her host society, to reproduce herself. In other words, this unit of biopower, sustaining households in two countries, cannot be guaranteed her own reproduction.

While in these processes care is commodified as labour power (something of value and is for sale), the worker is enjoined to *truly* care for the family she serves. In other words, she is told to act as if she were not working. While her work has economic value (i.e. earns income) to her recruiter, her family and country when she remits, she is enjoined to think that what she is doing is invaluable—because it is true, and authentic care that cannot be commodified.

In the end, workers ought to know themselves to be maids of good quality. Quality here is defined as the extent to which they make themselves subjects of servitude. To produce feelings of comfort and safety, workers need exhibit deference, obedience and transparency. One defers by acknowledging, greeting, bowing and giving the employer one's unreserved attention. One is obedient by never refusing an employer's request (so far as it is halal), by never talking back, by not being choosy (i.e. when it comes to food) and by dropping what one is doing at the moment whenever the employer calls one's attention. One is transparent by admitting to mistakes and asking permission for every single decision made—from when one exits the household (e.g. to pick up the children from school or doing the grocery), or to enter or exit a room, to making calls, to eat, sit, sleep, to practicing one's religion.

4.3.1 From Docile to Resilient Subjects

Filipina Care occupied the second to fourth floors of a non-descript commercial building in the heart of Quezon City, the National Capital Region's largest. It was administered by Ellie Cabigon,[22] a former public school teacher of 20 years. Apart from this training centre, Mrs. Cabigon also worked for another which deployed caregivers to Canada. There she taught "home management" and personality development modules. Filipina Care trained workers for a single recruitment agency. They were "in-house", meaning they were owned by said agency. Its quality of training was not subject to competition with other training centres. Good Quality training centre needed to develop a reputation on its own to keep agency-clients and student-clients happy. Compared to Good Quality, Filipina Care was a smaller operation, with a maximum capacity of fifteen students at a time. When I visited, there were only five present on the premises. It had two trainers and an in-house supervisor.

Like Good Quality, this training centre also displayed its mission and vision prominently at the doorway. It also emphasised core ethics of household service—obedience, morality, capacity to care and values required to overcome hardship.

[22] Not her real name.

Migrant domestic workers needed to understand themselves as strong, confident professionals whose job it was to provide care for employers. And as such, needed to recognise their worth as subjects of utility. Mrs. Cabigon said that the proper way to deal with one's employers was to know oneself. In the personality development modules, she elicited a "confession" from her students by discussing their physical, emotional, social and value systems. In this session, she asked them five questions.[23]

Through this exercise of self-examination, students came to know themselves—"You'll see their answers. You'll be able to process them. You'll see why they wanted to leave." For Mrs. Cabigon, the point of personality development was for her students to understand their strengths and weaknesses, and in doing so, allowed them to understand other people. And this was important because their job required "understanding and patience". If they did not have understanding, they would not be able to accept others. Since they dealt with people, it was important to understand what might motivate employers' actions, including on occasions where employers may physically harm them. "If you do not have the ability withstand trials and suffering, if you have no perseverance, you could retaliate". In the end, Mrs. Cabigon was happy that when her charge left the training centre they were less "tomboyish", and less likely to be quarrelsome.[24]

Through the act of revealing their innermost fears and desires, Mrs. Cabigon's students subjected themselves to her, each other, and themselves as subjects of knowledge. They were asked to reflect upon themselves with the objective of self-correction. This would allow them to make adjustments and improvements. That which links the micro-powers of discipline and the macro-powers of sovereignty is the "conduct of conduct". To govern means to "structure the possible field of action of others" (Foucault, 1982, p. 791). Key to this process is the constitution of oneself as a subject of knowledge. The conduct of good conduct for migrant domestic workers entails making them "known" to themselves, to employers, recruiters and state apparatuses. While training does not shy from describing the possibility of there being violence in the workplace, or societal dangers outside the household, instructors offer a limited range of possible responses in these situations. Conflict is resolved with calm acceptance and adjustment.

Governmentality's *homo economicus* is the ideal participant of the market in an entrepreneurial society. Homo economicus is a self-disciplining, self-policing and self-training individual who continually tries to improve herself in order to increase her value, her capital. Workers are made more valuable and are "capitalised" through investments in health, education, training and the like. Economic growth rests in the "intensification of human capital" (Tribe, 2009, p. 692) rather than an accumulation of physical capital or merely increasing the number of workers. In this scenario, the ministerial functions of the state—which used to dispense welfare services to the

[23] How do you see yourself in 5 years? If god gave you 5 million what would you do with it? If god made you an animal, what would you be and why? How are you as a friend and what do you look for in friends? In your wake, what would you want to hear from loved ones?

[24] The Filipino word used was *makipagbakbakan*—to battle.

population to ensure a biopolitically healthy and vigorous population—gives way to private enterprise for the provision of the same.

While immobility and discipline create the fundamental conditions of domestic worker migration, the "assembly" of a self-governing entrepreneurial subject makes possible not only the completion of the worker's employment contract, but repeated deployment to different migration destinations. There are limits to coercion, and workers must come to understand themselves as a specific kind of subject and govern themselves accordingly—whether this be as an economic subject that remits money, a heroine that saves her country or family, or a hyper-resilient subject (Chee, 2020) able to withstand extreme levels of insecurity. This is the kind of subject required by a neoliberal model of the economy which promotes risk-taking and care of the self. Evans and Reid point to the "sinister biopolitical partitioning" of those able to secure themselves and those who are asked to "live up to their responsibilities by accepting the conditions of their own vulnerability" (Evans & Reid, 2013, p. 96).

4.4 Conclusion

As a response to the demand for "quality maids", sending countries have devised not only training as a requirement for deployment but also systems of certification, notably the written and practical exams that workers must successfully pass to be deployed. As the next chapter shows, "quality" is pegged to the sending countries' sovereign guarantee rather than its actual substance. These certification systems (sovereignty) increase the workers' value in overseas markets, making them more marketable, justifying, in the case of the Philippines, a minimum wage. These systems also serve as a basis to place workers on an isotopic rank of quality maids, giving them competitive advantage over others deployed without such systems in place.

A closer examination of domestic work reveals, that what it means to reproduce a population entails more than the simple provision of support to sustain its existence, or, even its reproduction of human beings as labour power. We are, after all, beings whose needs extend beyond the biological. And a biopolitical technique to maintain an economically productive population must take into account its optimum happiness and health. The ideal domestic worker is one who is able to manufacture authentic care for her employers' consumption. It requires the bodily and attitudinal disposition to be agreeable, amiable and caring. These capacities are expected from students at the end of the training period as expressed in examination and assessment tools developed not only by the centres but, perhaps more importantly, by the sovereign state.

I characterise these centres as both disciplinary and entrepreneurial. Discipline is needed to capture bodily forces, that is, to make the body pliable as the living component of a (re)productive machinery. This is done through repeated performances of tasks until the body is habituated to their execution. Disciplinary power also

deploys other techniques, notably ordering through ranks of the least to most capable, according to a standard mean. The examination is a tool to determine whether the examinee has reached the required standard. The exam is a combination of hierarchical observation and normalising judgment which renders subjects as objects of knowledge whose capacities and weaknesses are made known to examiners—and the examinees themselves (Foucault, 1977, pp. 189–192). This reflexive aspect of the whole training process is what also capacitates as self-governing individuals. During training, different techniques are applied to produce workers able to withstand the rigours of migration and conditions of domestic work in receiving countries. In some cases, they are enjoined to surpass the limits of their station to become entrepreneurial subjects who are then expected to move up the socio-economic ladder.

Training exhibits a number of paradoxical, sometimes contradictory practices whose aim is to produce a "quality maid" who will consent, even embrace conditions of limit, restriction and servitude in order to gain freedom by other means. This "freedom" is coded in economic terms as a way to provide for children or parents left behind, but also along terms of recouping dignity, exhibiting heroism, with the always-present possibility of martyrdom.

Domestic workers are converted into human capital whose promised return of investment creates value at nearly all stages of migration. Aside from recruitment agencies and training centres, other businesses profit from the migrant's journey—medical clinics, insurance companies and other financial institutions like banks and loan services. The investment bears fruit in the form of her remittances which then reach home and are used to pay for her children's education, and her family's household expenses (Eversole & Shaw, 2010; Susilo, 2014; Yea, 2015). In other words, the worker functions as a unit of biopower for two populations. An implication is that thinking which seek to invest remittances in "productive" or entrepreneurial activities leading to "economic development" (Ratha & Sirkeci, 2010) actively redirect resources away from social reproduction, further worsening "care deficits" (Gammage & Stevanovic, 2018) in sending countries.

References

Anderson, B. (2000). *Doing the dirty work: The global politics of domestic labour*. Zed Books.

Arnado, J. (2013). Maternalism in mistress-maid relations: The Philippine experience. *Journal of International Women's Studies, 4*(3), 154–177.

Bakan, A. B., & Stasiulis, D. K. (1995). Making the match: Domestic placement agencies and the racialization of women's household work. *Signs: Journal of Women in Culture and Society, 20*(2), 303. https://doi.org/10.1086/494976

Barua, P., Haukanes, H., & Waldrop, A. (2016). Maid in India: Negotiating and contesting the boundaries of domestic work. In *Forum for Development Studies* (pp. 1–22). Routledge. https://doi.org/10.1080/08039410.2016.1199444

Chang, K. A., & Groves, J. M. A. (2000). Neither "saints" nor "prostitutes": Sexual discourse in the Filipina domestic worker community in Hong Kong. *Women's Studies International Forum, 23*(1), 73–87. https://doi.org/10.1016/S0277-5395(99)00088-6

Chee, L. (2020). "Supermaids": Hyper-resilient subjects in neoliberal migration governance. *International Political Sociology, 14*(4), 366–381.

Constable, N. (1997). Sexuality and discipline among Filipina domestic Workers in Hong Kong. *American Ethnologist, 24*(3), 539–558. https://doi.org/10.1525/ae.1997.24.3.539

Constable, N. (2007). *Maid to order in Hong Kong*. Cornell University Press. https://doi.org/10.7591/9780801460463

de Regt, M. (2009). Preferences and prejudices: Employers' views on domestic workers in the Republic of Yemen. *Signs, 34*(3), 559–581. https://doi.org/10.1086/593330

Debonneville, J. (2021). An organizational approach to the Philippine migration industry: Recruiting, matching and tailoring migrant domestic workers. *Comparative Migration Studies, 9*(1), 3–20. https://doi.org/10.1186/s40878-020-00220-2

Evans, B., & Reid, J. (2013). Dangerously exposed: The life and death of the resilient subject. *Resilience, 1*(2), 83–98. https://doi.org/10.1080/21693293.2013.770703

Eversole, R., & Shaw, J. (2010). Remittance flows and their use in households: A comparative study of Sri Lanka, Indonesia and the Philippines. *Asian and Pacific Migration Journal, 19*(2), 175–202. https://doi.org/10.1177/011719681001900201

Foucault, M. (1977). *Discipline and punish: The birth of the prison*. Penguin Books.

Foucault, M. (1982). The subject and power. *Critical Inquiry, 8*(4), 777–795.

Gammage, S., & Stevanovic, N. (2018). Gender, migration and care deficits: What role for the sustainable development goals? *Journal of Ethnic and Migration Studies, 45*(14), 2600–2620.

Hochschild, A. R. (1993). The managed heart. In *Feminist frameworks: Alternative theoretical accounts of the relations between women and men* (pp. 328–334).

Hochschild, A. R. (2012). *The managed heart: Commercialization of human feeling, updated with a new preface* (3rd ed.).

ILO. (2023). *Skilled to care, forced to work? Recognizing the skill profiles of migrant domestic workers in ASEAN amid forced labour and exploitation*. ILO.

Karim, M. F. (2017). Institutional dynamics of regulatory actors in the recruitment of migrant workers: The case of Indonesia. *Asian Journal of Social Science, 45*(4–5), 440–464. https://doi.org/10.1163/15685314-04504004

Kassim, A., Too, T., & Abidin, M. Z. (2014). The management of foreign workers in Malaysia: Institutions and governance regime. In *managing international migration for development in East Asia*. World Bank Group. https://openknowledge.worldbank.org/entities/publication/d23b05cd-b3aa-5633-9a13-ca8e65c5ab3e

Killias, O. (2009). The politics of bondage in the recruitment, training and placement of Indonesian migrant domestic workers. *Sociologus, 59*(2), 145–172. https://doi.org/10.3790/soc.59.2.145

Killias, O. (2018). *Follow the maid: Domestic worker migration in and from Indonesia*. Nordic Institute of Asian Studies.

Lau, P. W. L., Cheng, J. G. Y., Chow, D. L. Y., Ungvari, G. S., & Leung, C. M. (2009). Acute psychiatric disorders in foreign domestic Workers in Hong Kong: A pilot study. *International Journal of Social Psychiatry, 55*(6), 569–576. https://doi.org/10.1177/0020764008098294

Liang, L. F. (2011). The making of an "ideal" live-in migrant care worker: Recruiting, training, matching and disciplining. *Ethnic and Racial Studies, 34*(11), 1815–1834. https://doi.org/10.1080/01419870.2011.554571

Lin, S., & Bélanger, D. (2012). Negotiating the social family: Migrant live-in elder Care-workers in Taiwan. *Asian Journal of Social Science, 40*(3), 295–320. https://doi.org/10.1163/156853112X650854

Lindquist, J. (2012). The elementary school teacher, the thug and his grandmother: Informal brokers and transnational migration from Indonesia. *Pacific Affairs, 85*(1), 69–89.

Lindquist, J., Xiang, B., & Yeoh, B. S. A. (2010). *Johan Lindquist, Biao Xiang and Brenda S.A. Yeoh*. 7–19.

Lindquist, J., Xiang, B., & Yeoh, B. S. A. (2012). Opening the black box of migration: Brokers, the organization of transnational mobility and the changing political economy in Asia. *Pacific Affairs, 85*(1), 7–18. https://doi.org/10.5509/20128517

Lutz, H., & Palenga-Möllenbeck, E. (2012). Care workers, care drain, and care chains: Reflections on care, migration, and citizenship. *Social Politics, 19*(1), 15–37. https://doi.org/10.1093/sp/jxr026

Murphy, M. (2012). *Seizing the means of reproduction: Entanglements of feminism, health, and Technoscience*. Duke University Press.

Palmer, W. (2016). *Indonesia's overseas labour migration programme, 1969-2010*. Brill. https://brill.com/display/title/33687

Prusinski, E. (2016). Becoming siap mental: Education for transnational labour migration. *Ethnography and Education, 12*(3), 329–346

Ratha, D., & Sirkeci, I. (2010). *Remittances and the global financial crisis*. World Bank Migration Letters.

Susilo, S. (2014). Remittances of the Indonesian migrant workers on the improvement of family welfare in their home village. *Asian Journal of Humanities and Social Sciences (AJHSS), 2*(1), 61–67.

Tribe, K. (2009). The political economy of modernity: Foucault's Collège de France lectures of 1978 and 1979. *Economy and Society, 38*(4), 679–698. https://doi.org/10.1080/03085140903190391

van der Ham, A. J., Ujano-Batangan, M. T., Ignacio, R., & Wolffers, I. (2015). The dynamics of migration-related stress and coping of female domestic workers from The Philippines: An exploratory study. *Community Mental Health Journal, 51*(1), 14–20. https://doi.org/10.1007/s10597-014-9777-9

Yea, S. (2015). Rethinking remittances through emotion: Filipina migrant labourers in Singapore and transnational families undone. In L. A. Hoang & B. S. A. Yeoh (Eds.), *Transnational labour migration, remittances and the changing family in Asia* (pp. 257–282). Palgrave Macmillan. https://doi.org/10.1057/9781137506863_10

Yeoh, B. S. A., & Huang, S. (2009). Sexualised politics of proximities among female transnational migrants in Singapore. *Population, Space and Place, 16*(2), 37–49.

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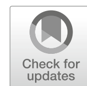
Chapter 5



Quality Control, Mediation and Management

> Diligence and obedience – that is our strongest point. Filipinas say, if I work here, how much are you going to pay me? How many hours do I have to work? Indonesians do not choose what kind of work they are going to do. If they work with one employer – they wake up at 5 AM, prepare the employer to go to the office, their employer's children to go to school. Then after that, clean the house. Before that or in between, they can even clean the cars. Maybe in the afternoon, they can clean the garden. With a small salary. That is our strong point.
>
> —Indonesian government official

Sending states' migration bureaucracies intervene in the training process primarily through assessment, examination and certification. To produce "quality maids", the Indonesian and Philippine migration bureaucracies have developed an accreditation system of training centres, trainers and assessors. In coordination with the industry, these government offices develop curricula standards and evaluation materials of student-trainees. Government officials also conduct their examination and issue certificates to out-going domestic workers. Sending countries' "warranty" is a promise to deliver quality workers through concerted efforts to professionalise domestic work. Claims to citizenship include the right to redress and repatriation, subject to the limits of the host country's jurisdiction. Workers who leave without documentation are as good as *homo sacer* (Lemke, 2005), a life with no sovereign guarantee. The disciplinary practices of standardised testing, combined with the sovereign's power to create legal persons with limited entitlements produce "quality maids" for export.

What I call "management" entails attempts of agencies to enforce the terms of the employment contract, negotiate work conditions, and advocate for days off, among other benefits. It also entails conflict resolution between employer and worker in what agents euphemistically call "counselling". Management includes directing domestic workers' leisure time to "productive" pursuits, which would steer them away from trouble—i.e. getting into relationships and possibly getting pregnant, or compromising their sexual health. Finally, agencies shape the scope conditions of workers' temporariness, as opposed to integration or settlement.

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5.1 Assessment, Examination and the Sovereign Warranty

While in Bekasi, I was able to observe an examination day at PT Seputra. Apart from their own students, those from another training centre had arrived to take their certification exam. Examiners said that this was a common practice, as smaller centres usually send their trainees to bigger venues. Examinees wore their agency's t-shirt uniform. Most were in jeans and came in the classroom barefoot. The exam consisted of written, practical and oral components. It began with a lengthy session, where the main examiner, Pak Kumbu, gave detailed instructions on how to fill out forms—the biodata, the certificate indicating the examinee was ready to take the test, and a self-assessment form. The examiners called attendance and checked that proper identification and photos matched. In the past, some students had sent proxies to take the exam on their behalf.

After the attendance, they filled in a self-assessment form which had three sections—(1) service, (2) nursing and (3) language, work ethics, and final pre-departure briefing (PAP). This form was a declaration on the students' part that the examination procedures were followed strictly.[1] It also tallied the expected competencies of examinees, and whether these have been ably demonstrated. The service section included cooking and cleaning tasks, while the nursing section had to do with care work for infants. The last section including communication skills with employers, taking phone calls, "developing emotional maturity and work motivation", "implementing health and safety in the household", and logistical know-how required by the PAP.

One of the examiners walked students through the painstaking process of filling out their biodata. It asked for their names, birthdate, birthplace, their parents' names, education and work experience. Students needed to also fill in their agency name and country of destination. The process of filling out the three forms took nearly 45 minutes. After the preliminaries, the written test itself took only 30 minutes. There were one hundred questions—the first half of which were about household and care

[1] The three sections asked students to tick the "yes" or "no" box given the following items:

- I received a sufficiently-clear explanation on the process of competence test/assessment.
- I was provided with the opportunity to familiarize myself with the competence standard for the test and assess myself on my achievements.
- The assessors gave the opportunity to discuss/negotiate the method, instrument, and source of assessment as well as assessment schedule.
- The assessors endeavoured to gather any supporting evidence suitable with my background of training and experience.
- I was provided with plenty of opportunity to demonstrate my competence during the assessment.
- I was given a comprehensive explanation on the assessment result.
- The assessors gave constructive feedbacks and the follow-ups upon the assessment.
- The assessors look through all the assessment documents with me and signed them.
- The confidentiality of the assessment result and explanation on assessment document handling was maintained.
- The assessors performed an effective communication skills during assessment.

work, and the second half about communication skills and attitude. This meant that they spent only 18 seconds answering each item.

At either end of the supply and demand stream, different actors speak of "quality". Sending governments want quality workers in order to compete with other labour exporters, and training is supposed to guarantee a quality "end-product". The Philippine government has sought to professionalise and train domestic workers in order to justify its demand for a 400 USD minimum wage (Guevarra, 2014, p. 144). Delivering quality workers is also seen as a way to head off employer-worker tensions and reduce the likelihood of abuse. For the steep prices they pay, there is demand for quality from employers in receiving countries.

Like the predeparture orientations and training, quality control also counts as "insurance". It is assumed that workers who have successfully been trained and certified could handle themselves, and would not need as much government assistance. They are able to report incidences of abuse, by themselves, to their respective embassies. They are able to handle troublesome employers. Pak Ismail, a government official who conducted pre-departure orientation for Indonesian workers, thought TKI should be trained properly so they would not need so much help from government: "…if they were to be trained properly and they had problems with their workers, instead of going to their government they could just try to handle it themselves." The underlying assumption was that workers who were properly prepared and informed may be able to address power imbalances in the workplace.

To produce quality workers, sending countries have devised certification systems which essentially function as a sovereign warranty, and symbolic of some semblance of quality control.[2] TESDA is the Philippine government agency assigned to accredit training centres, trainers and assessors. In coordination with the industry, it also develops curricula standards and evaluation materials. Finally, it conducts the examination of student-trainees and issues certificates to out-going domestic workers. The Indonesian counterparts are the *Badan Standar Nasional Pendidikan*[3] (BNSP), which develops training standards and examination forms and the *Lembaga Sertifikasi Profesi*[4] (LSP) which conducts the assessment and issues certificates.

In all, testing and evaluation instruments set a standard, a more or less uniform measure of skills, competencies, and other expected requirements of a "quality" domestic worker. From this norm, subjects could be evaluated accordingly, grouping them in categories—for example, those who were suitable for preferred markets (e.g. Taiwan and Hong Kong), and those "only" good enough for the Middle East. There were those suitable for elderly care, and those only for general housework.

[2] I say symbolic because in one examination I witnessed in Indonesia, it was evident that the exam-takers already knew the answers to the exam sheet. The assessor system in the Philippines is also vulnerable to corruption. An assessor was not supposed to assess more than ten students at a time, but this did not happen. As such there was moral hazard as the assessor receives 100 PhP per student assessed. NC II had also not been revised since the beginning of the programme. As such it was not unlikely that examinees already had the answer key before taking the exam.

[3] National Education Standards Agency.

[4] Professional Certification Agency.

Subjects occupy a locus in a disciplinary power's isotopic scale. The use of disciplinary techniques of the school, factory and the military, combined, create these distinctions in the market.

These instruments also serve as a benchmark that allows labour suppliers at both national and global scale to compete with each other. My Indonesian respondents repeatedly said that they were trying to "catch up" with the Philippines in terms of standard and quality.[5] Filipino migrant workers are generally understood to have better social protections than Indonesians (Wijayanti, 2023). The evaluation materials of both sending countries are similar in content and detail. The instruments also serve to create rank and hierarchy, in turn justifying the difference in salaries. Lastly, the certification systems serve not only to establish a "brand" in the domestic worker market, but also the sovereign warranty. Those who leave with certificates and proper documentation mean not only that they underwent training, but that they have been properly registered by their respective governments. In times of absolute distress—these workers have their embassies to run to and seek shelter, assistance, or ask for repatriation or redress, where possible. In other words, a worker with the sovereign guarantee signals the sending country's co-management in migration governance. An undocumented worker, on the other hand, exists on a different plane of liminality altogether.

An official at TESDA described partnering with different foreign governments to develop Filipino human resources either to staff foreign-invested industries or to work overseas. He said that the government administration was wary of a "lower representation of the Filipino image", the "national pride" and the higher risks involved in deploying vulnerable workers. The highest demand, however, was still in household service workers. "Compared to all skills, HSWs are still the number one demand – because the market is so huge!". The Philippine state has of course actively "marketed" its labour force overseas, going on marketing missions in nearly all the world regions. And over time, it has developed a reputation that receiving states themselves have made requests, proof that the Philippines is a successful "labour brokerage state" (Magalit-Rodriguez, 2010, p. 60). Filipinos are marketed as having essentialised traits, where they are innately hardworking, caring or patient. Anna Gueverra calls this "racial branding", showing how the government and PREAs "attempt to inscribe a particular identity on the bodies of Filipinos to offer them as model workers" (Guevarra, 2014, p. 133).

In a PAP session, instructor Pak Ismail said that because of domestic workers, the world knew about Indonesia, "You are also the ambassador of culture. Indonesia's image can be good or bad because of you. If you work well, then your employers will promote Indonesia". Where they are also "brand ambassadors" (Lorente, 2018, p. 64) or "ambassadors of good will" (Guevarra, 2010, p. 55), domestic workers inevitably represent their nation's faces. However cosmetic, attempts by governments to uplift the dignity of domestic work reflects the desire to preserve the

[5] The Philippines is conscious that other current or prospective labour-sending countries look to its migration bureaucracy as a model (Oh, 2016). The migration bureaucracy (POEA, CFO, OWWA) receives foreign delegates keen on learning best practices.

nation's honour, and with that, its reputation as a reliable migration partner. "Misbehaving" workers, or those that might be tempted to engage in criminality, would risk tarnishing the reputation of other Filipino workers (Guevarra, 2010, p. 56), and by extension, the Philippines' as labour broker par excellence.

5.1.1 Marketing by Employment Agencies

Agencies in the destination country also market their workers to prospective employers based on their skills, work experience, the kind of household they served, and "branding". This may mean coaching the applicant to beef up their resumé and helping them to realise that they may have more relevant work experience than they first thought. Singapore's new rules and regulations for agencies require them to upload a work history in the manpower ministry's database. Agencies smooth out inconsistencies or poor performance in the maid's work history. To make a worker more marketable, frequent transfers between employers may not reflect the real reason. For example, a case of sexual molestation may be explained away as "irreconcilable difference."

Employment agent Yasmine Zobel would use this record system to ensure worker discipline. "Good behaviour counts for something. If they do not have a good record at the Ministry of Manpower, how would I market them?" Good-looking applicants are rejected outright or placed in other sectors (i.e. food and beverage) because they would be difficult to market, again with the notion that they might pose a threat to the marital harmony of the host family. Those who finished their contracts had a higher bargaining power and could be marketed by the agent at a higher price.[6] However, the time limit of 14 days for transferees to find a new employer weakened bargaining power.

This system of records-keeping is also meant for employers to know about their worker's employment history. This information would include possible cases of misconduct. The MOM registry may include the previous employer's contact details, and the prospective employer or agency may initiate contact to solicit feedback. Feedback may be about the worker's attitude, levels of productivity and behaviour. If the worker broke the law, they would be blacklisted. In other words, this system of records-keeping, and positive recommendations from employers, gives past employers influence in the worker's future employment opportunities. This permanent surveillance also pressures the worker to be "constantly productive" in the household (Hierofani, 2021, p. 1745).

Asked whether he was concerned with competition from Philippine exporters, Jakarta recruiter Pak Sulaiman had this to say about Indonesians: "Indonesian people, they are known to be nice, polite. When they are given a child, the child listens

[6] According to one Singapore agent, the market rate for those who finish their contract is 500 SGD. Those who were very good cooks could command $700. High earners are usually over 40 years old and have worked for different nationalities.

to the parents. They do not talk back. In comparison to your country, if someone hits someone from your country, you are going get to angry."

Although they deployed Indonesians at one point during a Philippine deployment ban to Malaysia, Mr. and Mrs. Chong have only ever placed Filipinas. They said that Filipinas were the best—they were naturally more caring than other nationalities. In all, the Chongs were confident of their product. Minus a few deficiencies, Filipinas could be counted on to provide goods service against all odds. This was why they command higher prices in the market compared to Indonesians, Sri Lankans and Cambodians. In both Malaysia and Singapore there was a bias against workers from mainland China because they were seen as "family-wreckers", liable to cause "social problems"(Chang & Groves, 2000). In other words, "racial branding" works not only to boost the employability of some groups, but also to downplay the desirability of others.

In these examples, what are marketed are not simply skills, gendered norms, controlled sexualities, and ethnic or national stereotypes but also labour discipline. What are being "consumed" are not simply services, but identity markers which then serve as "boundaries" between the worker and the family whom she serves (Lan, 2003). These represent hierarchies, ones in which workers must carefully tack between deference and incompetence, so as not to disturb the lines of class, status and other kinds of distinctions.

In Singapore, various marketing gimmicks could be observed in some of the key shopping centres where agencies were clustered. Firstly, one could visibly spot workers as they wore a uniform t-shirt with their agency's name. There were even those who conducted "live training" so customers could see workers perform household chores in real time. These usually included ironing and making beds. There were posters and tarpaulins that show agency fees (Figs. 5.1, 5.2 and 5.3).

Malaysian maid agency AP Sands, which on its website claimed to be the "biggest domestic helper agency in Malaysia" boasted of an extensive online database of available domestic workers.[7] As of writing, the searchable database had 163 "available maids for hire". The database filtered according to nationality, age range, religion, zodiac sign, education, marital status and work experience (whether local or overseas). Each worker was assigned a "maid code" in lieu of their names, and a downloadable biodata. This biodata included a half-body photo, and details including their height, weight, marital status, number of children, and siblings. Information on their qualifications were years of experience, education, and their monthly salary in their first year of previous employment. There was a check box of tasks (care of babies, general cooking, etc.), and the worker indicated either "experienced" or "willingness", i.e. willingness to learn. The individual worker's page, which included their photo and maid code, also had options to share the page via Whatsapp or Facebook. This gave the viewer or prospective employer the possibility to share this information with other decisionmakers in the household. In the website menu,

[7] AP Sands, Maid search.

Fig. 5.1 Shopping Centre A, Singapore

there were three groups available—Filipinos, Indonesians and Myanmar "maids".[8] Reasons given to hire Filipinos were that they had a "lower runaway rate", apart from English-language proficiency and offering the possibility of being Christians.[9] Indonesians have a "cultural affinity" with Malaysians, "ensuring harmony" in the home.

Domestic work is excluded from labour laws for many national jurisdictions, including in Singapore and Malaysia, in part because the place of work is the household, and is therefore a "private" matter. However, the reluctance to regulate private life does not extend to the worker's own privacy. Apart from regular reporting to authorities about her sexual health and state of non-reproduction, restrictions to her access to the public sphere, and increasingly severe cases of surveillance, i.e. the instalment of CCTV cameras even within the household (Vitis, 2023, p. 3), workers' bodies, their work histories, conduct, personal relationships, and their likeness, are available for examination to the general public in shopping malls and online catalogues, and to employers in government databases. In other words, while this specific employment relationship is exempted from the sovereign power of law enforcement by either sending or receiving country, the commodified services within households, and indeed the commodified worker performing such tasks, are not exempt from market forces and public spaces of consumption. This is in contrast

[8] As of writing, deployment of domestic workers from Myanmar had been discontinued.

[9] Preferable to Chinese employers.

Fig. 5.2 Shopping Centre A, Singapore

Fig. 5.3 Shopping Centre B, Singapore

to the relative invisibility of the employer to the employer, whose details she does not know.

5.2 Employer Demands and Responsibilities

In Kuala Lumpur, I was able to observe prospective employers interview two candidates via Skype in Mr. Chong's home, which also doubled as their agency's offices. He briefed me about Katherine, a Malaysian Chinese woman in her early thirties, married to a Canadian. They had two children—boys of five and eight. They were going to Mr. Chong's to pick a new maid because the one they had before had run away after only two months. This maid, Rosanna, alleged that her female employer had declared love for her and had been poisoning her. All agreed that she was mentally disturbed.

Katherine arrived at half past nine along with her husband and mother. Mr. Chong quickly made introductions, but Katherine was not particularly interested in me or my research. She said that she thought Rosanna was already quite troubled even before arriving in Malaysia. Her family had been having money problems. Previously they were very poor, but scraped enough money to save up for a house and two vehicles in her hometown in the Philippines. Due to some dodgy deals they were on the verge of losing money. Katherine said that she understood how difficult that must have been—having worked as a maid in Hong Kong for 7 years, only to have their little nest-egg under threat.

We sat around the widescreen TV, waiting for the Skype calls from the Manila office. The only ones visible on the screen were Mrs. Chong and Katherine. Mrs. Chong asked all the questions as everyone else listened. Katherine sat scribbling some notes. The first applicant appeared on camera. Her name was Gina, a 29 year-old high school graduate with four children. Mrs. Chong asked who would take care of her kids. Her English comprehension was not very good, and had to be asked repeatedly. Mrs. Chong then turned to Katherine and asked what she was looking for. Someone to handle a headstrong eight year-old boy. And someone who could clean. Mrs. Chong said that those who were good with kids were not usually good with cleaning and vice versa. Katherine would not find someone who was good at both.

Mrs. Chong would later explain to me that Filipinas were known for the first set of skills—caring for kids and the elderly. This was a more sociable kind of job which required communicating with children, and administering medicine to the elderly. Anybody could clean. All the rest—Indonesians, Sri Lankans, Cambodians, got paid less because they could not do care work like Filipinas. Katherine wanted someone who had initiative and who did not need to be told what to do. Mrs. Chong said that person would be more responsible, more intelligent than most. A girl like this would not want to be nagged because she would "feel sore." Did Katherine want someone who was intelligent, or someone a bit more reserved who would not mind being told things over and over? After a brief pause they switched briefly to Chinese

and I could no longer follow the conversation. Mrs. Chong then said that she was being very frank, she apologized for her frankness. "We are not that kind of agency…".

The second applicant was Annalyn. She had a child and had worked in Doha previously. Mrs. Chong quizzed her a bit more about her prior employment and working condition—how big was the house, how many people were living there, did she take care of kids, how many? Annalyn said that there were six children in the house and she took care of two. Annalyn's child was quite young, would she miss her? Did she like dogs? This family had two dogs that need to be bathed and brushed. They mentioned that they also had two cars that needed cleaning. Apparently this couple travelled a lot. Mrs. Chong asked, "Do you accept that you will be lonely? You won't run away?" She then asked her to rank her choice of tasks according to her level of liking (1) care for kids, (2) care for the old, or (3) cleaning and cooking. As her final question, Mrs. Chong asked Annalyn if she was willing to cut her hair short once she arrived in Kuala Lumpur. The rapid succession of questions could only be answered with multiple nods and yeses. Annalyn barely said a word. After witnessing a few more of these "interviews", I figured applicants were not really meant to speak.

As soon as the family left, Mrs. Chong turned to me and told me she would not be taking on this employer-client. "Too finicky. Has impossible expectations." The Chongs were astute and had been in business long enough to know whether a match would be successful or not. They prided themselves in careful screening of both parties—the employers and their maids. This was a relationship that they likened to a marriage. A bad match meant more work for them as they provide "counselling". This could mean endless hours on the phone as the employer complained about the maid. Mr. Chong said that after a stressful day, the employer needed a "punching bag" and they were happy to play the part. Once the employer let off steam, the next morning everything was forgotten. "Life goes on as normal for maid and employer." The alternative would be another runaway like Rosanna, who at the time was residing in the Philippine embassy's shelter.

Singapore's Ministry of Manpower regularly publishes an employer's guide to hiring domestic workers (Ministry of Manpower, Singapore, 2021). This guide has suggestions on how to choose an employment agency and what to look for in workers. Employers are enjoined to carefully study the worker's biodata to make sure that they meet the minimum age requirement of 23 years old, and eight years of formal education. In the section "Attributes to Look For When Selecting a Suitable MDW", carers of children and the elderly are expected to be "mature" and "patient", and able to communicate clearly with parents and care recipients. "General household" cleaners should be able to communicate and understand instructions.

The Ministry of Manpower now has an online directory[10] which categorises agencies per number of years in operation, customer ratings, retention rate, transfer rate, demerit points and placement volume. The retention rate signals the percentage

[10] Ministry of Manpower, Employment agencies directory.

of workers that the agency has placed who stayed with the same employer for at least six months. The transfer rate reflects the percentage of workers who had transferred to three or more employers within a year. Demerit points are issued to agencies that breach conditions of the Employment Agencies Act, the Employment Agencies Rules and Employment Agency Licence Conditions. Those who commit major infringements, such as the illegal deployment or abuse of migrant workers may have their licence revoked. Depending on the number of points accrued, agencies must meet administrative requirements. For example, those who earn 8 demerit points would need to pay a security deposit of 60,000 SGD. The licence will be suspended or revoked if the agency accumulates 24 points. In the Employment Guide, employers are encouraged to look for these figures in their selection of an employment agency (Ministry of Manpower, Singapore, 2021, p. 7) (Fig. 5.4).

Both the online registry and the demerit point system, which was put in place in 2014, reflect the increasing regulatory oversight over employment agencies. Compared to the employment guide published in 2005, the sections discussing the role of employment agencies, as well as how employers engagement with them are much more detailed. The 2005 version only has one sub-section "Engaging the Services of an Employment Agency", which encourages employers to make sure that they are dealing with a duly licenced and accredited company (Ministry of Manpower, Singapore, 2005). The other sections are mainly about the steps in employing a migrant domestic worker, obligations of both employers and workers and building a relationship. This 2005 version is only 28 pages long, while the 2021 version is twice as long (56 pages including annexes).

Like Singapore's MOM, Malaysia's Ministry of Human Resources (MOHR) has an online list of active employment agencies[11] although the interface is not nearly as detailed as MOM's. The only available information includes the agency's name, address, category and the dates in which its license is valid. The list can be sorted per category,[12] i.e. the type of workers they deploy. The MOHR also has a list of duly recognised recruitment agencies in source countries.[13]

In lieu of employment norms, backed by formal labour legislation and enforcement, what drives this specific type of market oversight is employers' satisfaction and reporting. In absence of worker rights, industry standards take their cue from their "paymaster" client, rather than their "loan type" client. While employers have more information about the market performance of employment agencies, and the detailed information about workers, the latter cannot exercise an equivalent type of consumer choice. While she may have had an option to select the recruiter in her home country, she has no choice in the latter's partner agency in the receiving country. While MOM and MOHR's employment guidelines very clearly demonstrate

[11] Ministry of Human Resources, List of private employment agencies.

[12] Agencies dealing with migrant domestic workers are categorised under B.

[13] While there are 12 (?) official source countries, countries listed in the MOHR online list only include Cambodia, India, Myanmar, Pakistan, the Philippines, Sri Lanka and Vietnam. https://fwcms.com.my/affiliates/#recruitment-agencies.

How do I choose an EA?

Visit the Employment Agencies and Personnel Search E-Service page on the MOM website (www.mom.gov.sg/ea-directory) and look out for:

✓ Whether an EA has been issued with demerit points by MOM
Demerit points are given to EAs when they break the rules.

✓ Ratings by the EA's customers
These are ratings given by employers who have engaged the services of the EA to recruit their MDWs. The employers are invited by MOM to rate their EAs' services based on a set of questions. The aggregated ratings from the employers are published online to help prospective employers in their EA selection.

✓ The number of placements the EA has made in the past 12 months
The number of successful placements could be an indicator of the scale of the EA's business. However, apart from sheer volume, you should also be looking at the two indicators below.

✓ The EA's MDW retention rates
The EA's retention rate refers to the percentage of MDWs placed by the EA who have stayed with the same employer for at least 365 days. This is a possible indicator of the ability of the EA to match MDWs with MDW employers suitably.

✓ The EA's transfer rates
This refers to the percentage of MDWs who, within the past 12 months, have been placed by the same EA to 3 or more employers out of the total number of MDWs it placed. A higher rate of transfer could possibly indicate poorer matching.

Taken together, these indicators will give a sense of the overall performance of the EA, and may be useful in helping you decide when you are choosing an EA to help you with your needs.

Fig. 5.4 From the MOM employment guide

what employers want in the worker, nobody cares to take note of what workers want of their employer.

The old and new versions of the employment guide dedicate the bulk of their content on the management of the relationship between employer and worker. Apart from the section on how to engage the services of an employment agency, the guide recommends that employers contact the agent when the worker is “depressed” and cannot be consoled by the employer’s “listening ear” (Ministry of Manpower, Singapore, 2021, p. 40). The employment agent should also have facilitated a

"safety agreement" between the employer and worker, in which it is made clear how the physical safety of the latter is guaranteed in the household. This has to do with the specific tasks of either hanging the laundry pole or cleaning the household's windows. These may be dangerous tasks when the household in question is in a high-rise building.[14]

In 2017, Malaysia's Ministry of Human Resources (MOHR) likewise published "Guidelines and Tips for Employers and Foreign Domestic Helpers" (Ministry of Human Resources, 2017). The guide was developed in consultation with employers in 2015, and prepared by the MOHR and the International Labour Organization (ILO).[15] The 72-page booklet was published with funding from the European Union's "Global Action Programme on Migrant Domestic Workers and Their Families" (GAPMDW[16]) with the and the support of the government of Australia, through the TRIANGLE II project.[17] Like the Singapore guide, it begins with practical information that includes what "qualities" to look for in employment agencies. Apart from making sure that they are duly licensed and accredited, employers are also enjoined to consider the length of time the agency has been in operation ("experience"), to make sure that it uses the standard contract of employment endorsed by the Malaysian government, check whether it has "good practices in dealing with foreign domestic helpers", and whether they have facilities for training, or if they have a space in which workers may spend their days off (Ministry of Human Resources, 2017, p. 8).

After these cursory reminders, the bulk of the guide is devoted to two sections "Creating a Happy and Harmonious Home with my Foreign Domestic Helper" and "Communications, Cultural Issues, Relationships and Skills Building". To successfully "manage" the relationship between employers and helpers, the former are enjoined to provide a reasonable private space for their worker and to make sure that they have sufficient daily meals. To create "mutually beneficial working conditions", employers are asked to recognise that their relationship is one between an employer and an employee, that workers are not part of the family. This means following the terms of the employment contract.

What is euphemistically called "clear communication" entails the employer to basically break down tasks, specify hours of work and hours and days of rest, payment details, and for the employer and worker to agree on these terms. It entails making sure that the worker understands how to use implements and appliances, and family members' dietary restrictions. Working hours are understood to be

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[14] The statistics on domestic worker deaths from falling in Singapore are scarce. According to a 2012 news article, the MOM counted 75 deaths from 2000. According to research by the ILO Jakarta Office, there were over one hundred deaths of Indonesian domestic workers alone from 2000 to 2005.

[15] The ILO is an international organization that has official representation from governments, worker groups and employer groups. It aims to promote labour standards.

[16] GAPMDW was implemented by the ILO.

[17] TRIANGLE in ASEAN (Association of Southeast Asian Nations) is a programme promoting fair migration in Southeast Asia.

variable from task to task, and the needs of the household, and so they are determined in consultation with the worker. There is emphasis on making sure that the worker is well-rested, and that the worker's well-being is to the benefit of the household (Fig. 5.5).

The guide broaches the possibility that the worker might engage in sexual relations, even with members of the household, consensual or not. Finally, employers are encouraged to allow their workers to form friendships, as this would "provide

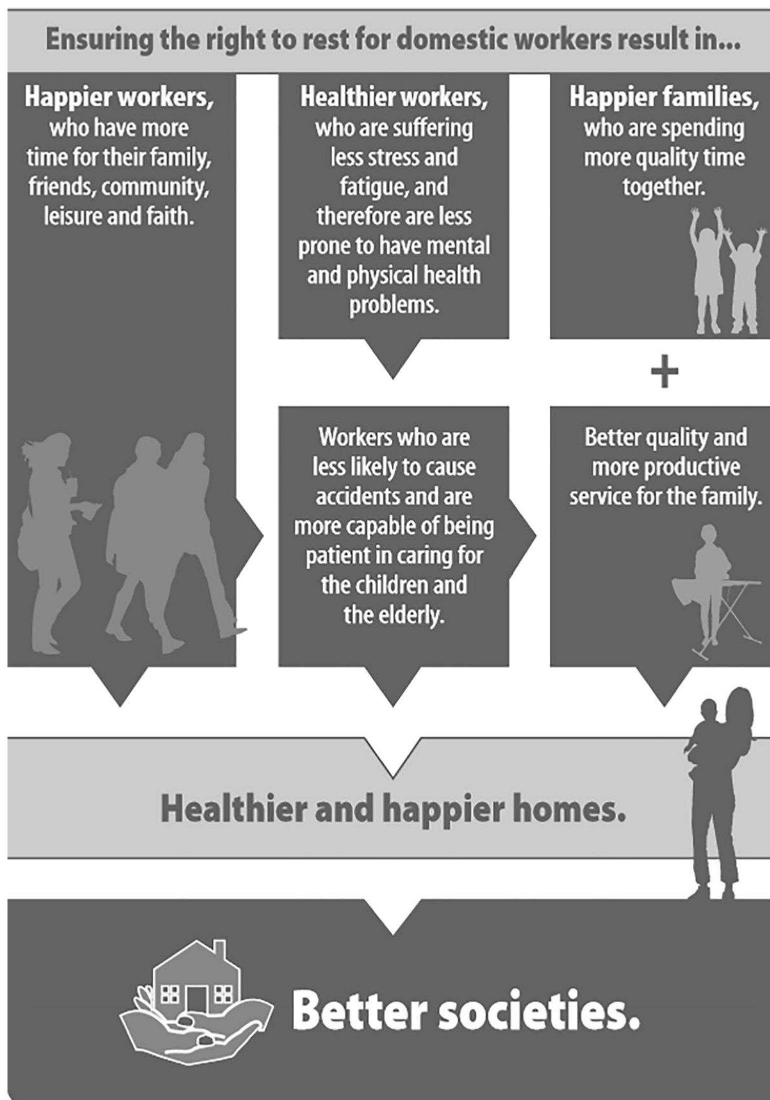

Fig. 5.5 MOHR "Guidelines and Tips for Employers of Foreign Domestic Helpers", p. 19

the necessary support he/she needs and hence this may contribute to an increase of productivity" (Ministry of Human Resources, 2017, p. 38).

Even though this guide was ostensibly co-written by the ILO, there is remarkably little "rights talk" (Elias, 2008) in the document. There are a number of statements where the employer is reminded that certain practices are illegal, such as confiscating the passport, or working with illegal employment agencies. Instead the focus is on "responsibilising" (Shamir, 2008) employers, i.e. to share in the burden of managing their worker. Formal legislation is replaced with guidelines, and stakeholders are enjoined to reflect on their responsibilities. Indeed, it is the same kind of configuration in which families are in charge of "the management of a care system centred around the figure of a paid care worker" (Triandafyllidou & Marchetti, 2015, p. 17). The "diffusion" and "displacement" of responsibility to employers and agencies, and their "disentanglement" from the rest of society leave the worker in a dependent, vulnerable position (Chin, 2019).

Lastly, the guide assumes that "difficult conversations" arise out of cultural difference rather than conflicting interests, i.e. something as basic as who is going to stay at home on weekends when the worker should have a day off. The topics deemed problematic that need guidance and "tips" have to do with attitudinal norms, religious customs, hygienic practices and food preferences. Like workers, employers are also asked to manage their emotions so as not to make the worker "fearful and hence more liable to run away out of such fear" (Ministry of Human Resources, 2017, p. 32). In cases where the worker may refuse to take instructions, employers are advised to seek the assistance of the employment agency.

5.3 Mediating Spaces, Managing Time

Employment agencies in destination countries occupy a middle space not only between workers and employers, but also between territorial jurisdictions of sending and destination countries. For example, Amrita Mudaliar, a Kuala Lumpur agent, said that they found their partner agencies in the Philippines through the recommendation of someone in the Philippine embassy in Kuala Lumpur. "We have to accredit with the Philippine agent there. Without the POEA contract, the maid cannot enter Malaysia". Their agency had three partners in the Philippines, two of which were in Manila and one in the province. Asked what she looked for in her accredited partners, she said that she just wanted "good maids". She wanted to know that they were "really qualified", that they had undergone training.

One afternoon, I accompanied Kuala Lumpur agent, Mr. Chong, and his own domestic worker, Jenny, on one of his errands to the Philippine embassy. We were supposed to turn over "troubled" worker Rosanna's belongings, wages and air ticket. An embassy official was supposed to have arranged for Rosanna to come to the embassy for her to sign some documents and to receive her things. Since the official had failed to do this, she had asked Mr. Chong to drive her to the embassy's shelter instead. The shelter was a duplex house with two floors. At the time, it

housed thirty women. Since I was not allowed to enter the shelter premises, the official asked Rosanna to come outside to sign the papers. Rosanna was crying. After the signing was completed, she went back inside the shelter, and another worker came out. She was to fly out that evening and the embassy official thought she might as well catch a ride with us. Mr. Chong said something along the lines of the official having to work so much. Back at the embassy, Mr. Chong instructed Jenny to see about a job order from another embassy official while we sat in the vehicle. She came back moments later to say that the job order cost 400 RM, to authenticate documents. Mr. Chong said that the fee depended on how many documents needed to be authenticated. In this moment, boundaries between two sovereign jurisdictions was not quite clear. Certainly it seemed as though what should have been the Philippine embassy's function was being performed by the Mr. Chong.

Mr. Chong's home also served as a temporary accommodation for newly-arrived workers. They would stay for a few days to adjust and be briefed before their employers picked them up. At the time when I was visiting, they had two workers who wanted to be repatriated to the Philippines. So their office/home/accommodation served as a kind of half-way house whenever the dispute between employer and worker became unbearable. In Singapore, Yasmine Zobel also served as temporary accommodation and half-way house. The agent would shelter the worker she deployed in cases of severe dispute, or, when the worker expressed wanting to be repatriated. The agency may also serve as a waiting space when the worker was awaiting transfer to another household, or, for something as mundane as employers going away on a two-week holiday. Yasmine Zobel recalled this instance:

> This helper told me, her employers are going on a holiday and they have not left her any money and there wasn't any food in the fridge. When I spoke to the employer she said that she would give fifty dollars and the maid could have fresh air. I told her, just let the maid stay with me. Just pay eight dollars even though we charge ten. The employer is stingy, so I said, just give me five dollars because I have to feed her. So yeah, they left her with me.

In these situations of extreme dependency, where the worker's "ability to self-advocate" rests on their "performance of docility" (Parreñas, 2021, p. 1061), the employment agent may take up the cudgel if they were so inclined, and charge it as extra service.

Apart from employers, employment agencies configure physical and non-physical boundaries which allow or disallow workers to access physical and social spaces, and to minimise social "bads". Singapore offers self-improvement classes to better manage workers' time on days off. The Foreign Domestic Worker Association for Social Support and Training (FAST) is a charity that offers many services to domestic workers, including a physical space in which they may spend leisure time. Noelle Ngo, an employment agency insider who was one of those who initiated the creation of FAST in 2005, said that they primarily wanted to "enhance the quality of life" of domestic workers in Singapore. And they thought they could do this with upskilling and personal development so that they improve their employment prospects upon their return to their origin country. While these aims may certainly be true, this allocated space, and the workers' "productive" use of time are also "spatial

fixes to draw migrant workers away from local neighbourhoods and town centres" (Goh & Lee, 2022, p. 3326). This time management of off-hours also means the worker is enjoined to be productive, for her time to be use.

Indeed migrant domestic workers' access to public spaces is shaped by their specific incorporation in the receiving society. Where domestic work is seen as having low status and of little value, migrants' presence in public spaces are seen with contempt and suspicion. These spaces are represented as "physically and socially polluted landscapes" (Yeoh & Huang, 1998, p. 593), in which encounters are perceived as having a "contamination and perilous influence" where the domestic worker who is deferential within the household transforms into a "brazen siren" without (Yeoh & Huang, 1998, p. 594). Employment agents help police these spatial divides by portraying the outside world as corrupting and dangerous, where they might fall into bad company, including possibly being seduced by strange men. In this regard, the same discourses are produced by employment agents in the receiving countries as PDOS and PAP instructors—overseas/outside, "there is a lot of AIDS".

While this specific justification for the control and surveillance of workers' access to public space is well-documented in the literature (Elias & Louth, 2016; Hierofani, 2021; Parreñas et al., 2020; Vitis, 2023), there is less said about other reasons to be wary of workers meeting up in public spaces. In social networks, workers may be able to share information—about their scope of tasks, work hours among others. These differences in working conditions, could, in turn increase expectations and demands. This was why, according to Singapore agent Amina Abdullah, her employer clients almost always prefer a "fresh maid", someone who has little experience in domestic work overseas. "Ex-Singapore" workers "know too much" and therefore "demand too much". She said that some experience was not a bad thing, and she would market those who have between two to four years of experience. These are the ones who were "good material", because they could "withstand any kind of weather" and they did not have many friends yet.

PREAs establish relationships with the official representatives of migrants' sending countries in these everyday encounters. Employment agents engage with embassy officials in matters to do with the worker's documentation, permits, and other logistical matters. Recently, the AEAS launched an initiative similar to the FAST programmes, giving workers a place to pursue self-improvement and creative activities. Philippine embassy officials were invited to the official launch (Vicencio-Luz, 2023). The case of the agreement between the Philippine embassy and Singapore's Association of Employment Agencies, is a more formalised relationship which largely serves as a symbolic gesture and "cannot correct the human rights deficiencies" in the workplace (Marti, 2018, p. 1348).

In the everyday conduct of their business, employment agencies tread the blurred lines of sovereign jurisdictions. In the vignettes described above, this "middleman" of migration quite literally facilitates the flows of workers to and from the private household, the embassy, the airport, and their sending country. Agencies also police social boundaries which may or may not take the shape of actual physical immobility. They help restrict access to the public domain by minimizing access to

communication and social networks. They do so by various means, including the discursive manufacture of danger and risk in public spaces. Aside from these less overt practices, agencies may also help in actual practices of surveillance. The provision of dedicated spaces in which workers may spend leisure time reinforces the divide between citizens and their servant class.

5.4 Dispute Resolution and "Counselling"

Under the harmless rubric of "counselling", agencies mediate between employer and worker on conflicts over employment conditions, and worker attitude and manageability. The agent also offers counsel either to the worker or the employer. This could take many forms, including encouragement to persevere against difficulty, exhortations to be more patient, offering solutions to problems, among others. Counselling mitigates tensions and attempts to resolve conflicts, not only so that the worker could complete her contract. It is also in the interest of the agency to develop a good reputation, and to deliver good "after-sales" service because it counts on referrals, from both sets of clients (the employers and workers), to generate new business. Part of after-sales service includes listening to employers "rant" about their maid. A phone call to the agent may last up to an hour as the employer lets off steam, or even to simply to express their resentment.[18] They address customer dissatisfaction by reminding employers to go easy on their worker. Yasmine Zobel, would take calls from her employer-clients:

> Sometimes you have to remind them, she just started and has only been with you a week. Give her time to adjust. Concentrate on her good points. She may not be very good with housekeeping, but is she good with your children? When you come home from work, what are they doing? Are they in bed? Have they done their homework? Have they eaten? We have to remind them that they should prioritize.

Sometimes, employers implore the agent to discipline the maid on their behalf. Zobel said that employers would tell her to scold the maid or shout at them. She said that it was not her cup of tea, and would much prefer to speak calmly. "But the employer tells me for me to scream, to scold them thoroughly."

Counselling may take equally malignant forms, something that Malaysian NGO worker Xavier Go called "animal taming". When a maid ran away from the employer's house back to the agency, she was convinced to go back to work with certain techniques. This could mean only feeding them bread when rice was the food staple that constituted a "real" meal. Technically, they were not being starved, but they were also not being fed properly. It could also mean putting them in solitary confinement and separating them from others in the agency's accommodation if they talk too much or talk back. There was also outright physical coercion:

[18] The phrase used by one respondent is "*may mapagsabihan ng sama ng loob*" which literally means to have someone to whom one could say one's grievance or resentment.

> And then of course the physical abuse. When you say – no, no, this is my right – pap! The beautiful part with this is that they hire an Indonesian ex-maid as their supervisor. So it was not, him [the agency owner] who did that. But the Indonesian maid who became the supervisor in the centre who would do it. So this is a very smart way of passing on the responsibility.

This technique of hiring a co-national to "counsel" workers was something a Malaysian industry insider wanted as a standard practice. "I have two counsellors – one Filipino and one Cambodian. I want to suggest to the government to make this procedure formal. We need this. I told government every agency needs this counselling".

Small and medium agencies who had a smaller client base offered personalised services to keep customers happy. This may mean being on call, sometimes literally 24/7 for any emergency. When conflict could not be diffused or resolved over the phone, the agent may request to visit the household to investigate a report made either by the worker or the employer. An intervention could be termed "home service" or "extra service". Cases may be related to petty crimes, like an accusation of theft. There were also cases that entailed removing the worker from the household. This was when agents use the terms "rescue" or "take back" the maid.

Kuala Lumpur agent Mr. Chong recounted two cases when he had to personally investigate a reported problem. In the first case, a female employer had complained about how her maid seemed to have gotten bold and now answered back. True to his hunch, Mr. Chong found that the husband was having an affair with the worker. Interestingly, Mr. Chong uses the possessive pronoun repeatedly while recounting the exchange with his employer-clients:

> …I'm afraid I have to withdraw, I gave you a maid. A maid and nothing else. She was stunned. I said – look, I cannot get involved in your marital problems. But I can get involved – the maid is mine. I am taking her back. So I took the maid back. And I was leaving the house with the maid…Next morning the husband calls. Where's my maid? The maid is here. I want my maid back. No, I gave you a maid but you didn't treat her like a maid. He said, I'll sue you. I said, go ahead, sue me.

Apart from conflict resolution between employers and workers, Singapore agent Noelle Ngo noted that there were no industry standards on how to resolve conflict between agencies and employers, i.e. if the employer demanded to be reimbursed or if she believed that she had been over-charged. There was a resistance to resort to legal procedures because issues pertaining to the maid and the household were private and family issues. When asked if he would report rape, Singapore agent Iskandar Raban said that he was not required to do so. It was the job of the police. "Are you going to report it, you report it, you go throughout the process, at the end of it no, maid's words against the employer's words." Raban preferred that problems be solved outside legalistic and bureaucratic frameworks. He offered practical solutions and did not want to needlessly burden his clients. Given the extent to which small and medium-sized agencies offer these services, employers who paid a pittance should not expect assistance when problems occurred.

The informal, privatised means by which conflict resolution in the workplace is resolved does not give workers a lot of leverage to realise the terms of the

employment contract. The mediation of employment agencies puts the onus of fair working conditions and treatment on the good nature of employers. This results in "soft violence", where employers act on this unequal relationship and at the same time cloaking it (Parreñas et al., 2020, p. 4672). Sovereign states abdicate the responsibility of what might be called labour inspection. While labour attachés might be empowered to do this in formal sectors, they cannot visit homes.

5.4.1 Negotiating Work Conditions

The employment contract is the core legal document that guides employer-worker relations because domestic workers are not usually covered in the receiving country's labour legislation. It states the salary to be received by the worker, whether she has a day off, and that she should have adequate rest and food. However, its efficacy as a governing tool is limited by the fact that it exists in a social and legal space where no authority can proactively enforce its terms. In Singapore, breach of contract will only have legal ramifications if the worker were to bring up the issue to the local courts or the Manpower Ministry. For example, the Philippine embassy can only assist workers if all parties agree to comply. Only the Ministry of Manpower can compel either the employers or the local agents to participate in dispute resolution. To further illustrate, Singapore has officially mandated a day off for all migrant domestic workers whose work permits were issued or renewed from January 2013. Despite this controversial ruling which was publicly-debated for over thirteen years, there are still reports of non-compliance (HOME, 2015, p. 11). In Malaysia, the exclusion of domestic workers from the Employment Act of 1955 denies them the possibility to make a legal case against their employer in cases of non-payment of salary, and other breaches of the employment contract. Severe cases of conflict, which may involve violence, are resolved informally with the help of the recruitment agency, and sometimes the consulate (Whelan et al., 2016).

PREAs play a conflicted role in seeing that the contract reflects expected outcomes. They are conflicted because this means balancing what could be opposing interests of the employer and worker. Nevertheless, agencies who are inclined to mediate do find ways to bargain for better work conditions since these increase the likelihood of the worker completing the two-year duration of her contract. Manila field agent, Kevin Gomez, said that he coached applicants on how they could get employers to give a day off or be able to use their mobile phone:

> When they interview you, ask them – can I get a day off at least once a month? Because they will tell you – can you work for us for two years without a day off? But can you give me a day off? Ok, I will give you after one month. Ok, then. What will you do on your day off? Go to church. Or tell them, you'll explore. Give them a good reason. Tell them you're going to church. What's your religion? Roman Catholic. At least once a month. And then the mobile phone – they will allow you to use one. Just not during work hours. During your rest period, they will give you your phone.

The agent's conflicted role is highlighted in the case of Yasmine Zobel, a Filipino agent who was now a Singapore citizen. On the one hand, she could and did bargain to improve work conditions for the worker she placed in a Singapore household. She recounted an instance where she had to explain to an employer why the maid needed a day off: "Like any human being, they want to have rest also. Or, you know, to unwind, and then start anew." On the other hand, she also convinced workers to pay four months' worth of their salary—despite the POEA's no placement fee policy—by telling her recruits that it would be difficult to market them to employers. She told them that they should be grateful the salary deduction was not as sigh as before (seven months' worth). She convinced them that they needed her, and that this was what they were paying her for—"If you do not have an agency, where will you go if you have a problem? Where will you be 'returned'"?

Iskandar Raban, another Singapore agent, said that it would be in everyone's gain to balance employers' and workers' interests, along with his. "If the customer does not pay, you do not get paid. If the maid does not work, you do not get paid." It was therefore in his interest to keep the relationship going, and to mediate to resolve everyone's problems. It was important for both sets of clients to trust that he would protect everyone's interests and to minimise financial losses.

Although agents tried to balance what may be opposing interests of both sets of clients, it was clear who has a stronger influence. Singapore agent Yuan Guo Sheng said that between the "paymaster client" (employer), who has paid money up-front, and the "loan type" client (worker) whose payment must be deducted from her salary, the former's voice carried more weight. Because of this, it would be difficult to say no to employers who requested certain work conditions, i.e. disallowing the worker's possession of a phone, allowing no days off, limiting religious practice within the household and the maintenance of very short hair, among other body modifications.

Counselling for workers took benign forms. It meant coaching workers to be explicit about the need for adequate food and rest, and to mention that this was stated in the employment contract. Or to remind workers that they should persevere despite difficult conditions, that they need to do so for their families back home. They may even go so far as to offer the agency office as a space to hang out on days off. Yasmine Zobel said that on their days off, some of her charge stay at the agency the whole day so she would bring some snacks. "We always have coffee for them. They come, they chat with other workers, they make friends." When a worker's spirits flagged and when she expressed the desire to go home, employment agents reminded her of the main reasons why she came in the first place—to earn a living to support the family she has left behind. It is the ultimate migration rationale expressed by officials and instructors in PDOS and PAP. Noelle Ngo shared how she kept her girls "steady":

> You are here to work. Your tone and your facial expressions matters to the girl, because you need to give her comfort, that she is in good hands, then you tell her that you know, do not put on this face. In Singapore, Chinese employers, whichever employer, they do not like this face. We tell a bit of story, get into a conversation with her, and shake her a bit but friendly, and then offer her a drink or something, just like a guest, like that, then you watch

> her. If she is still stern, if she is still not cooperative, then I will give another measure or a different tone. I say, you are not here to be spoiled by me, okay, I've been talking very nicely to you, you have not shown any improvement, I want you to wake up. If you used to have long face, can you please send it back to Indonesia, mentally send it back okay, but here be nice, because someone is going to pay you money, someone is going to give you food and lodging, rain or shine you do not have to worry, there are no floods here that you have to worry, but importantly is every month you have money to send back to your family.

In the absence of the law and law-enforcers (sovereignty), PREAs deploy different techniques in trying to meet the terms of an employment contract, even when the contract exists in a juridical vacuum. There is resistance to elevating disputes to legal resolution because the household is a private space, and the domestic worker is subsumed in the "family". What should be a juridical practice is converted into a market service for which the recruiter can charge extra (home visits, making repeated phone calls, temporary housing of the worker for counselling, etc.).

Singapore agent Iskandar Raban, sourced his workers from Java. His business was all about maintaining balance in relationships and gaining the trust of both sets of clients—the worker and the employer. He said that he had to gain the worker's trust because in cases of a dispute, the worker would run to him—not to the Singapore Ministry of Manpower or, worse, the Indonesian embassy. He recounted one particular instance where a worker was not being given enough food and rest. He made a personal visit to the employer's home and brought the worker toiletries and some food, after which she was pacified, grateful for Raban's intervention. The worker was then grateful to her agent, not only for her employment, but for every concession she should already have by right, if the conditions of her employment contract were enforced by the receiving state.[19] Because it was not, the more dedicated agent will perform all manner of negotiation to see that what is owed the worker, such as a day off, was given.

Because what is purportedly a formal relationship between employer and worker lacks sovereign enforcement—informal, personalised relationships oil what would otherwise be a transparent economic transaction of salary paid in exchange for services rendered given certain work conditions as mandated by law. Apart from financial debt, which the worker pays through what can be non-transparent salary deductions (HOME, 2021), she is also in moral indebtedness—to the employer who paid large sums for her migration, and to the agency to whom she is dependent to improve her working conditions.

[19] Employment contracts even underscore the need for employers to provide their workers adequate food and rest.

5.5 Conclusion

The sovereign warranty signals not only a competitive "product" which merits a certain price, but also signals efforts to professionalise domestic work. It is also a guarantee of the orderly transfer of the worker to and from origin and destination. The disciplinary practices of standardised testing, combined with the sovereign's power to create legal persons with limited entitlements, produce quality maids for export. On the one hand, the assessment and examination procedures conducted by TESDA and BNSP/LSP may be merely symbolic, given that the actual exercise I witnessed in PT Seputra suggests that exam-takers already knew the answers to the questions. At forty-five minutes, it took longer to go through documentation, and filling out of forms, than the actual exam. Twenty minutes to cover one hundred items is too short a time. The "truth" of the examinees' capacities is not therefore of primary importance. Even the system of TESDA assessment is compromised by the fact that assessors get commission depending on the number of number of assessments they conduct. This creates a moral hazard as there is incentive to be done with as many cases as possible, at the possible expense of arriving at a truthful result.

Nonetheless, these systems of certification do set a standard norm which would categorise workers as more or less desirable to destination countries. On the other hand, there is also space for variation, in which different traits may be marketed to specific niches. PREAs create market hierarchies, in which certain groups are able to command higher salaries, marketable according to often racialised logics.

While systems of certification may be merely a symbolic exercise, they legitimate the worker as not only trained and qualified, but someone who has passed the sovereign's quality control. This, in turn, has real-world consequences in increasing her value in overseas markets. The sovereign's warranty serves as a basis to place her on the isotopic rank of quality maids, giving her a competitive advantage over other nationalities. Quality control serves to "diversify products" in segmented markets, and produce a standard for benchmarking, which then fosters comparability and competition. Despite what would nominally seem to be a *laissez-faire* attitude, sending states are invested in labour export not only by fostering the emergence of a migration industry, but by actively participating in migration governance through administering techniques and technocratic solutions.

Record systems in both sending and destination countries ensure discipline, and guarantee that workers are always visible to governments, employers, PREAs and even the general public. In Singapore, permanent surveillance means that past and current employers influence workers' future employment opportunities. While she is always visible, the worker rarely has the same means or capacity to "see" her employers, and other factors that may influence her future working conditions.

The panoptic observation of the worker extends beyond employment relations, but also serve to structure her access to public space, and even the use of her time. PREAs reinforce the PDOS and PAP discourse about the perils of the domain beyond the household—where she may be seduced by strange men, fall into disgrace, and may even endanger her bodily investment free of diseases (especially of

the sexually-transmitted kind). Non-governmental organisations such as FAST seek to manage what should be workers' leisure time, steering them away from "temptations" or other such wasteful activities. They are instead enjoined to make productive use of their time off, to spend it on self-improvement. In this sense, PREAs and the government pre-deployment sessions use governmentality to structure immobility by appealing to her good senses, while intervening at the level of the social. Disciplinary efforts to reorganise her experience of spaces and time make it difficult for other kinds of subjectivities and solidarities to emerge.

The mediation practices by agencies are ways to informally resolve disputes in private spaces that are not, as yet, juridical. Agencies mitigate conflict by offering "counselling" to both sets of clients (i.e. workers and employers). This means being accessible to complaints, and balancing between conflicting demands—the employer, the worker and the agency's. The end-goal is not only guaranteeing a modicum of harmonious worker-employee relations but the completion of the employment contract. These practices take over where the law will not enforce the letter of the contract. Employment guides and counselling assume that the source of conflict is not primarily about the employment relation. What is obscured by the non-recognition of domestic work as *work* is the class compromise in a standard employment relationship (Vosko, 2010, p. 59). Employers' drive for labour control is tempered by legal limits to their claims on the worker's time and efforts, and workers pledge loyalty in exchange for income and stability. In domestic work performed in households, there are no profits to be made, but there are financial outlays that employers are eager to recoup. Unlike employment relationships in other sectors, the employer is at risk to not only recoup their investment but to lose it entirely, if the worker absconds or runs away.

Finally, agencies play a part in shaping the details of their recruit's work conditions, and even their relative freedom to control their body (e.g. to dress or wear their hair how they please). Being in the agent's good graces may entail whether they have a weekly day off, whether they are allowed to have a mobile phone, their job scope, salary, and terms of payment. The employment agency may be arbiter of last resort, or even just a physical space in which a worker may seek reprieve from severe employment conflict. The vacuum left by state legislation and enforcement, is converted into the market actor's "after-sales" service.

References

Chang, K. A., & Groves, J. M. A. (2000). Neither "saints" nor "prostitutes": Sexual discourse in the Filipina domestic worker community in Hong Kong. *Women's Studies International Forum, 23*(1), 73–87. https://doi.org/10.1016/S0277-5395(99)00088-6

Chin, C. (2019). Precarious work and its complicit network: Migrant labour in Singapore. *Journal of Contemporary Asia, 49*(4), 528–551. https://doi.org/10.1080/00472336.2019.1572209

Elias, J. (2008). Struggles over the rights of foreign domestic workers in Malaysia: The possibilities and limitations of 'rights talk'. *Economy and Society, 37*(2), 282–303. https://doi.org/10.1080/03085140801933330

Elias, J., & Louth, J. (2016). Producing migrant domestic work: Exploring the everyday political economy of Malaysia's 'maid shortage'. *Globalizations, 13*(6), 830–845. https://doi.org/10.1080/14747731.2016.1155340

Goh, D. P., & Lee, A. (2022). Migrant worker recreational centres, accidental diversities and new relationalities in Singapore. *Urban Studies, 59*(16), 3312–3329. https://doi.org/10.1177/00420980221081336

Guevarra, A. R. (2010). *Marketing dreams, manufacturing heroes: The transnational labor brokering of Filipino workers*. Rutgers University Press.

Guevarra, A. R. (2014). Supermaids: The racial branding of global Filipino care labour. In *Migration and care labour: Theory, policy and politics* (pp. 130–150). Palgrave Macmillan.

Hierofani, P. Y. (2021). Productive and deferential bodies: The experiences of Indonesian domestic workers in Malaysia. *Gender, Place & Culture, 28*(12), 1738–1754. https://doi.org/10.1080/0966369X.2020.1855121

HOME. (2015). *Home sweet home: Work, life and Well-being of foreign domestic workers in Singapore*. Humanitarian Organization for Migration Economics.

HOME. (2021). *Overcharging and deceptive practices in the domestic worker recruitment process*. Humanitarian Organization for Migration Economics.

Lan, P. C. (2003). Negotiating social boundaries and private zones: The micropolitics of employing migrant domestic workers. *Social Problems, 50*(4), 525–549. https://doi.org/10.1525/sp.2003.50.4.525

Lemke, T. (2005). "A zone of Indistinction"—A critique of Giorgio Agamben's concept of biopolitics. *Outlines, 7*(1), 3–13. https://doi.org/10.1002/app.21300

Lorente, B. (2018). *Scripts of servitude: Language, labor migration and transnational domestic work*. Multilingual Matters. https://www.multilingual-matters.com/page/detail/?k=9781783098989

Magalit-Rodriguez, R. (2010). *Migrants for export: How the Philippine state brokers labor to the world*. University of Minnesota Press.

Marti, G. (2018). The effects of multilevel governance on the rights of migrant domestic workers in Singapore. *Journal of Ethnic and Migration Studies, 45*(8), 1345–1360.

Ministry of Human Resources. (2017). *Guidelines and tips for employers of foreign domestic helpers*. Ministry of Human Resources.

Ministry of Manpower, Singapore. (2005). *Your guide to employing a foreign domestic worker*. Ministry of Manpower, Singapore.

Ministry of Manpower, Singapore. (2021). *Employing a migrant domestic worker: Practical advice for anyone hiring an MDW*. Ministry of Manpower, Singapore. https://www.mom.gov.sg/-/media/mom/documents/publications/guides/your-guide-to-employing-a-mdw.pdf

Oh, Y. A. (2016). Oligarchic rule and best practice migration management: The political economy origins of labour migration regime of The Philippines. *Contemporary Politics, 22*(2), 197–214. https://doi.org/10.1080/13569775.2016.1153286

Parreñas, R. S. (2021). Discipline and empower: The state governance of migrant domestic workers. *American Sociological Review, 86*(6), 1043–1065. https://doi.org/10.1177/00031224211032906

Parreñas, R. S., Kantachote, K., & Silvey, R. (2020). Soft violence: Migrant domestic worker precarity and the management of unfree labour in Singapore. *Journal of Ethnic and Migration Studies, 47*(0), 4671–4678. https://doi.org/10.1080/1369183X.2020.1732614

Shamir, R. (2008). The age of responsibilization: On market-embedded morality. *Economy and Society, 37*(1), 1–19. https://doi.org/10.1080/03085140701760833

Triandafyllidou, A., & Marchetti, S. (2015). *Employers, agencies and immigration: Paying for care*. Routledge.

Vicencio-Luz, K. (2023). Philippine embassy attends the launch of the fun day for migrant domestic workers, an initiative of the association of employment agencies Singapore. https://www.philippine-embassy.org.sg/philippineembassy-attends-the-launch-of-the-fun-day-for-migrant-domestic-workers-an-initiative-of-the-association-ofemployment-agencies-singapore/

Vitis, L. (2023). Surveillant assemblage: Overt, covert, movement and social surveillance in domestic and family violence in Singapore. *Women's Studies International Forum, 96*(102664), 1–9. https://doi.org/10.1016/j.wsif.2022.102664

Vosko, L. (2010). *Managing the margins: Gender, citizenship, and the international regulation of precarious employment*. Oxford University Press.

Whelan, J., Nordin, R., Ishak, M. K., & Matwi, N. (2016). Abused and alone: Legal redress for migrant domestic Workers in Malaysia. *Indonesia Law Review, 6*(1), 1–37.

Wijayanti, A. (2023). Social security provision for international migrant workers: Comparing Indonesia and The Philippines. *Jurnal Jamsostek, 1*(2), 2. https://doi.org/10.61626/jamsostek.v1i2.66

Yeoh, B. S. A., & Huang, S. (1998). Negotiating public space: Strategies and styles of migrant female domestic Workers in Singapore. *Urban Studies, 35*(3), 583–602. https://doi.org/10.1080/0042098984925

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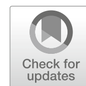
Chapter 6
Conclusion



> "This industry is crisis-proof, economic crisis-proof. Whether in time of crisis or not, people still need a maid. Whether people lose jobs or not, people still need a maid. If they can hang on to it, they will hang on to it. So the industry will always be there."
>
> —Yuan Guo Sheng, Singapore agent

Through the business activities of private recruitment and employment agencies, it is clear that international migration is not simply the result of macro-structural forces, i.e. restructuring economies, governmental ethos, and the push-pull factors of wage differentials. It is not simply the outcome of micro-economic motivations either. For this category of migrant, as well as many migrant workers in Asia and elsewhere, it is also influenced by PREAs who serve as important shapers of global labour markets. Far from passive instruments merely responding to labour supply and demand, agencies actively search out new opportunities overseas, and establish linkages with local counterparts. To remain in business, they must keep the "pipelines" open and "inject a self-perpetuating dynamism into migration that continues longafter the original, usually economic, reasons for the flow may have been reduced" (Wee & Sim, 2004, p. 171).

The book, at its core, sought to understand what PREAs in domestic work do, and their relationships with state bureaucracies, employers and workers themselves. Unlike smugglers and traffickers, PREAs are the only *legitimate* actors in migration motivated primarily by profit. But even while they run businesses, they also balance many conflicting interests, apart from advancing their own. They mediate relations between sovereign jurisdictions, between the household and the public, and between employers and workers. As for-profit entities, processes of mediation are opportunities to advance market shares, improve against competition, and offer new services.

PREAs' activities are bound by rules of incorporation, licensing and accreditation. In this way, they are subject to their own state's juridical powers. The state may revoke licenses and halt operation subject, to rules on good corporate conduct. As private entities, they are able to perform a number of activities that would otherwise be seen as heavy-handed if performed by state entities. For example, home visits are deemed "after-sales services" rather than labour inspection. In this type of "informal governance", (Helmke & Levitsky, 2012) what is gained is purported efficiency and flexibility, at the cost of non-transparency. The question as to whether the migration industry has positive or negative effects on migration depends on the normative goals ascribed to migration governance. Of the criteria by which to judge

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the quality of global migration governance—legitimacy, rights, equity, and efficiency (Betts, 2013, p. 59), businesses are supposed to deliver the latter. If by efficiency we mean the least amount of resources allocated to gain the maximum value, then domestic worker migration is labour-intensive, (re)produces myriad public and social "bads"(Musgrave, 1974), and is very expensive.

The biopolitical transfer of what might be called "social reproductive forces" from sending to receiving countries causes a "care deficit" (Williams, 2010). Caring capacities and resources are "extracted" (Wichterich, 2020) from poorer to richer countries, exacerbating care inequalities. In lieu of her actual labour, the domestic worker remits money back to her family to be spent on activities meant to reproduce the household back home (education, healthcare, everyday expenses) (Rahman & Lian, 2009; van Naerssen et al., 2016). This means that efforts of governments, and even international financial institutions to invest remittances in "productive" or entrepreneurial activities may further worsen care inequalities (Nyberg–Sørensen et al., 2002). This oversight results from the relative invisibility of how social reproduction, specifically domestic work and caring labour, matters in broader public policy. Chapter 5 further shows how this transfer of biopolitical "resources" favours the receiving country by actively requiring that the domestic worker does not reproduce herself, even as she helps rear a new generation in the country of deployment. Routine pregnancy examinations enforce sterility as condition of employment. Consequences of the failure to police domestic worker sexuality in some receiving countries in the Gulf, for example, include stateless children (Mahdavi, 2013).

The biopolitical partitioning of the domestic worker from the host society extends not only to physical and social restrictions, or class and status distinctions, but to the near-impossibility of permanent settlement. While the path to citizenship is possible for other categories of labour migrants, this is not the case for those who have ever held domestic work permits in Malaysia and Singapore. There are also restrictions to marrying citizens, with idiosyncratic provisos, such as having to ask permission to marry from the labour ministry. In other words, the low status of domestic work carries with it not only low remuneration, various risks, and inadequate legal and social protections, but an identity that becomes a "fixed pathology"(Ladegaard, 2019, p. 300).

While the low status of domestic work, and those who perform it, is more or less permanent, other identity categories are marketable, or not, depending on specific needs of households. PREAs put emphasis on age, race, ethnicity, nationality and religion if it suits the gendered and racialised demands of employers. Attitude, temperament, and hyper-feminised attributes such as "submissiveness", become selling-points because what is ostensibly being bought and sold are not specialised skills. Training in domestic work has been envisioned to merit higher salary thresholds and the upskilling of this category of worker. Due in part to the moral hazards of the systems of certification and assessment, and the commercial interests of PREAs and training centres themselves, the outcomes are variable.

Because destination countries do not adequately invest in the public provision of care, private households take on financial risks in order to secure a domestic worker from overseas. While female citizens are increasingly participating in the formal

labour force, the gender division of labour is not fundamentally disturbed (Huang & Yeoh, 1998, p. 33). The large capital outlays, and the increasing administrative and managerial load expected of employers,[1] have led to demands for "quality maids".

In training centres, disciplinary practices are key to the "assembly" of these workers. The highly structured and hierarchical organisation of training centres resemble schools, prisons and military barracks. Disciplinary techniques are necessary to properly invest and create value in the worker herself, as this period marks her entry into the supply chain. This process of capitalisation is far more lucrative than what they are purportedly in centres for—the acquisition of language, caring and household skills. In this period, discipline primes the worker to withstand long periods of immobility, necessary for her to realise her market value to two households and two countries that have privatised systems of social reproduction and welfare.

While the focus of training is to produce workers who will be able to withstand very difficult living and working conditions overseas, the ambivalence in whether the domestic worker is part of the family or not nevertheless creates expectations of authentic care. The "extraction" of this form of labour requires the more subtle art of governmentality, of the conduct of conduct. The worker is expected to be able to manufacture positive affect for her employing household's consumption. Just as the best of sex workers veil the commercial transaction with the performance of authenticity (Carbonero & Gómez Garrido, 2018), authentic emotional labour requires the bodily and attitudinal disposition to be agreeable, amiable and caring. These capacities are expected from students at the end of the training period, as expressed in evaluation and assessment tools developed not only by the centres themselves but, perhaps more importantly, by the sovereign state. In the market categorisation of PREAs themselves, the "generalists" whose primary tasks are to perform household chores, are easier to source because cooking and cleaning are not as cognitively demanding as caring for the young and the elderly. For caring tasks, PREAs prefer workers who have had caring responsibilities, either through previous domestic work, or in their own personal lives.

The Philippines and Indonesia's systems of certification, while primarily symbolic, are not without market functions. Because they signal quality and the sovereign guarantee, Filipino and Indonesian domestic workers gain competitive advantage in increasingly diversified markets, and an ever-increasing number of labour-exporting countries in the Global South. Like PREAs, government officials may trade on gendered and racialised "branding" of workers to employers. What is being "guaranteed" is orderly migration and labour discipline, and not necessarily language skills, cultural competencies and professionalised domestic or caring services.

The counselling and mediation practices by agencies are ways to informally resolve disputes in spaces that are not, as yet, juridical. These practices take over where the law will not enforce the letter of the employment contract, and where

[1] Women still disproportionately do this managerial load.

there is reluctance to compromise the privacy of households. However, the same privacy is not accorded to workers themselves, as they are more or less subject to panoptic and isotopic surveillance from the moment they enter the labour supply chain. During recruitment and training, they are "sorted" into skill categories (generalists or caregivers) and overall competence desirable to preferred, higher-paying markets. Due to managerial and security risks that have been off-loaded to them, responsibilised employers also practice surveillance to protect and to ensure a return on their "investment". Workers are subject to record-keeping by labour ministries, which also helps ensure labour discipline, especially when employers may nominate workers to be "blacklisted" without having to offer evidence of wrongdoing (Chin, 2019, p. 536). Finally, worker profiles are available for perusal to the general public, on the websites of employment agencies. They are "searchable" according to different identity categories, skill-sets and even "willingness to work on off-days", sortable as in any online catalogue. Workers have the least "visibility" of the supply chain and stakeholders, as they are not privy to information about PREAs other than what may be available on government websites, and generally have no choice in employers. PREAs themselves are becoming increasingly visible to employer-consumers, ranked and profiled not only as a matter of official recognition by governments, but also according to their market performance.

Neoliberal migration governance in migrant domestic work centres the activities of PREAS, and demonstrates their differential relations and engagement with governments, workers, and employers. In low-rights contexts, these market actors deliver what would otherwise be government functions as commodified services. The migration industry surrounding domestic worker migration in the region and elsewhere is profitable and durable, even though there may be volatility and uncertainties in prices and the supply chain. Over the decades, they have become and continue to be permanent features of the political economies and development trajectories of the Philippines, Indonesia, Malaysia and Singapore.

Workers themselves are in a weak position relative to other stakeholders. In low-rights contexts, they are excluded from key legislation that would mitigate the power of employers to command their time, productivity and even their very personhood. The household being the workplace exacerbates power asymmetries, as workers rely on employers not only for their right to work but also their right of residence in the receiving country. Employers have almost unmitigated discretion to have workers fired or "replaced" without justification. Restrictions to workers' collective action in Malaysia and Singapore, and their migrant status, make it very difficult to organise and make demands on public authorities (Piper, 2006). Sending countries have limited powers and resources to enforce the terms of the employment contract, even if they were inclined to do so. The low-status and gendered nature of domestic work, and the women who perform them, make it difficult for diplomatic representatives to prioritise this category of worker, even when, paradoxically, they generate value for so many stakeholders in both sending and receiving countries.

Neoliberal migration governance in domestic work exemplifies the success of labour export in terms of scope, reach and durability. Market-driven migration regimes in the Philippines, Indonesia, Malaysia and Singapore are able to source

and deploy a bewildering number of workers within and from the region at an ever-expanding scale. Given demographic changes in ageing Asia, the demand for domestic work can only increase. By mid-century, the number of those aged 65 and older will outpace the working-age population (OECD & Organization, 2020, p. 66). Even though there have been bureaucratic and legal reforms that would ostensibly safeguard workers' welfare, it is difficult to assess their success in practice. The original impetus for labour import and export casts a long shadow. Their roles in the developmental models of all four countries mean that without leverage and real bargaining power, migrant domestic workers have little means to improve upon their working and living conditions.

6.1 Attempts at Standard-Setting—International Norms and Global Migration Governance

PREAs are increasingly recognized by global governance bodies as important actors in labour markets. At the same time, they are also seen as possible sources of precarity in cross-border mobilities, because they operate in and take advantage of legal loopholes between national jurisdictions (Stringer et al., 2021). Some of the proposed solutions to regulation are premised on market logic that do not significantly address the problems outlined in the previous chapters (Pittman, 2016, pp. 31–32). While it may be useful to create public registries to make agencies visible to consumers (i.e. employers), the latter's concerns with PREAs have to do with the cost and quality of their service, not the worker's well-being. Third-party certification of these agencies could indeed be a form of monitoring and oversight. However, the built-in asymmetry in the influence of the "paymaster client" (employer) over the "loan-type" client (worker) may also shape the purpose of monitoring in the first place. Apart from this, it is difficult to imagine how such a mechanism may balance the interests of both employer and worker. Suggestions to improve recruitment practices entail transitioning from a "moral" case to a "business" case for greater compliance, e.g. tax exemptions, market access, etc. (Hooper, 2023).

The International Organization for Migration (IOM) has played a role in recruitment and placement, along with other services, that facilitate migration (Gabriel & Macdonald, 2018). The IOM practices migration management, with an emphasis on "efficiencies of time and transparency, [and] about rules and criteria for both states and migrants" (Barber et al., 2017, p. 1729). As such, it essentially practices a market logic of migration, where governance entails managing the links between surplus and demand in workers. Its projects include labour migration programmes and training, which turns the IOM "into a kind of labour recruitment agency" (Geiger & Pecoud, 2020, p. 10).

The IOM launched the International Recruitment Integrity System (IRIS) in 2014, along with the International Organisation of Employers (IOE). The "IRIS

Standard"[2] is a set of guiding principles which sets criteria for what counts as fair and ethical recruitment. These criteria are addressed to the "labour recruiter" who is expected to exhibit certain behaviours. For example, the recruiter "does not recruit migrant workers under the age of 18", to comply with the principle "Respect for Laws, and Fundamental Principles and Rights at Work" (IOM, 2019, p. 3). The principle "Respect for Freedom of Movement" calls on the recruiter to "not hold the passports, other identity documents, work permits" of the migrant (IOM, 2019, p. 7). Compliance to the standard basically relies on voluntary self-regulation, as there are no mechanisms which would enforce these behaviours.

The International Labour Organization (ILO) is another global governance body which has recently adapted its legal instruments on recruitment to address the realities of cross-border mobilities. At the 2004 International Labour Conference (ILC), an ILO Resolution highlighted the need to give special consideration to migrant workers, about half of whom were women. The Resolution identified the role of PREAs in international migration, and acknowledged that "some engage in unethical practices which may contribute to irregular migration, causing hardship to migrant workers" (ILO, 2004, p. 2). The Resolution called for the development of guidelines to regulate PREAs, and to promote "ethical recruitment". Although the concept was initially developed in the context of healthcare worker migration and its consequences (e.g. brain drain), (Bach, 2003), the ILO began to fully flesh out the concept from the launch of the Fair Recruitment Initiative (FRI) in 2014. Ethical recruitment entailed "re-engineering the business process of recruitment agents and sub-agents" (ILO, 2014, p. 6). The FRI was meant to promote fair recruitment practices, reduce costs, and prevent abuses in the recruitment process, particularly for migrant workers. It has completed two phases of funding (2014–2019, 2021–2025), and will launch its third later in 2025.

6.1.1 Fair Recruitment—Country Programmes

The FRI was in many ways quite similar to the IOM's IRIS. Its core objectives aimed to create legal frameworks, promote fair business practices, empower workers and produce knowledge that would enable evidence-based policymaking. In its first two phases, the FRI rolled out 35 development cooperation projects in 50 countries (ILO, 2024).

To realise the aims of FRI, the ILO launched the Integrated Programme on Fair Recruitment (FAIR), which ran in three phases (2015–2018, 2018–2022, 2022–2025). FAIR engaged various stakeholders in both sending and receiving countries, i.e. "migration corridors". Phase I looked at the following: the Philippines, Hong Kong, Nepal, Jordan, and Tunisia. Phase II built on the first phase and carried on multistakeholder projects in all of the first phase countries, except Hong Kong.

[2] The IRIS Standard may be downloaded on the IRIS website https://iris.iom.int/iris-standard.

Finally, Phase III has a global coverage, although it focuses on corridors among Tunisia, the Arab States, the Ivory Coast, Ghana, Lesotho, and South Africa. Apart from carrying out the core pillars of FRI, these projects aimed to build and strengthen tripartism, where the ILO served as facilitator and technical assistant to governments, civil society, media and businesses. The spirit of social dialogue among the major stakeholders could really only be realised if there were official representation from all major partners, including PREAs themselves.

Under the auspices of FRI, the ILO, together with the International Trade Union Confederation (ITUC), launched an online platform in 2018, which, in principle, reversed the visibility of PREAs and workers. Recall that while PREAs, employers and governments have more or less continuous surveillance of workers, the latter have very limited information about these other stakeholders. The "Recruitment Advisor[3]" platform solicited reviews of agencies from workers themselves. The platform also gave information on workers' rights based on the "ILO General Principles and Operational Guidelines for Fair Recruitment". There were agencies submitted by governments on the platform including those in the Philippines, Indonesia, Singapore, and Malaysia.[4] The goal was to rely on the reporting initiative of workers themselves to build the equivalent of the agency database run by Singapore, where criteria of good performance are in alignment with fair recruitment principles. The reviewer was asked to list the costs of incurred during recruitment, and to indicate whether they received information about their rights and obligations, complaint procedures, and other useful services in the destination country. The review page also asked for information on whether they received a detailed employment contract, and basic working conditions (e.g. whether they received the salary they were promised). Finally, workers could write free-form in a comment box. While there were 13,767 PREAs registered on the platform, the vast majority (12,491) had no reviews, suggesting that the platform has not been in popular use.

Outside of FRI, the ILO also had parallel programmes that touched on recruitment. The "ILO Triangle in ASEAN" aimed to improve migration governance in the region. The programme worked with PREAs in Cambodia to sign up to new codes of conduct. Lao PDR created a business association to represent the interests of employment agencies in the spirit of tripartism and social dialogue (Morris et al., 2024). The "Improved Migration Governance Project: Protecting the Rights of migrant domestic workers and plantation workers through improved labour migration governance" sought to clarify and make transparent recruitment costs and processes, standardise employment contracts, and promote good practices in Malaysia (Holliday & Man, 2020).

Apart from practical interventions, the ILO has sought to make the operations of PREAs, and existing governance mechanisms, "legible" through the production of

[3] https://www.recruitmentadvisor.org/.

[4] As of writing, there are PREAs based in Nepal, Saudi Arabia, Hong Kong, Taiwan, South Korea, United Arab Emirates, Kuwait, Canada, Bahrain, Jordan, Algeria, Kenya, Sri Lanka, Bangladesh, Ghana, Nigeria, Ethiopia, Uganda, India, Germany, American Samoa, Tunisia, Morocco, and Qatar on the platform.

knowledge products about them. For example the "Achieving fair and ethical recruitment: Improving regulation and enforcement in the ASEAN region" presents the ten countries' existing laws and regulations about the industry, regulatory structures, and complaint procedures among others. The information is presented in a way that one can compare and contrast each country with the other. There are specific references to domestic workers, for examples whether PREAs are required to report on workers' accommodation, and specific legislation or policies in regard to the sector. It then ends with ways forward to achieve FRI goals (ILO, 2022a). A compilation of existing best practices, the "Compendium of Promising Practices to Advance Fair Recruitment of (migrant) workers" concretely demonstrates what are already being done in various country cases, including the promotion of "fair business practices" and the protection and empowerment of workers (ILO, 2022b).

In the tripartite structure of the ILO, having to solicit the buy-in of the Employers' Group means having to reconcile with business interests. While the ILO had initially sought to abolish fee-charging recruiters altogether, the Employers' Group and its affiliate the CIETT (Confederation of Private Employment Agency) succeeded in making recruiters and employment agencies legitimate stakeholders in managing labour markets. With the establishment of the Private Employment Agencies Convention (C181) in 1997, the migration industry could operate openly as market actors (K. Jones, 2022, pp. 308–309). As such, C181 reversed the "ILO's historic stance against labour market intermediaries and its sceptical view of non-standard forms of employment" (Vosko, 2000, p. 282). There are, so far, 38 ratifying countries of the Convention, none of which are in Southeast Asia.

Running in parallel to the FRI programme, the ILO also launched the "Global Action Programme on Migrant Domestic Workers" (GAP-MDW) in 2014. This project examined five migration corridors and to promote labour and human rights specific to these channels. They included mobilities between (a) Nepal and Lebanon, (b) Paraguay and Argentina, (c) Ukraine and Poland, (d) Zimbabwe/Lesotho and South Africa, and finally (e) Indonesia and Malaysia. Within this programme, the ILO conducted studies and supported tripartite dialogue on the recruitment process. These activities resulted in codes of conduct, and guidelines addressed to the various stakeholders, including domestic workers themselves (Murray, 2017). These activities have as much to do with the socialisation of stakeholders to ILO norms, as with the promotion of tripartism itself. Due to the voluntary nature of these guidelines, their impact on reducing abuses in the recruitment process are limited, as shown in Chap. 5. Further, an ILO-funded study on the efficacy of these codes of conduct in Hong Kong showed limited change in the status quo. About half of migrant domestic workers surveyed showed that they were still charged excessive or illegal fees, and nearly three-quarter said their agency still confiscated their identity documents (Hong Kong Federation of Asian Domestic Workers Unions, 2018).

The ILO is in competition with other sources of labour standards, as they are increasingly incorporated in trade agreements and even schemes by international financial institutions. These stem from different philosophies and ideological commitments (e.g. the management approach of the IOM). There are deep structural differences between "a neoliberal approach and a rights-based approach" (Chen,

2021, p. 115). To stand out in this crowded field, the ILO should "engage boldly not just in setting labour standards, but in formulating competing economic and social theories against those currently accepted" (Chen, 2021, p. 115).

The ILO's Convention on Domestic Work (C189) is a global norm-setting instrument that accords domestic workers many of the labour rights we take for granted (e.g. regularly receiving a salary, days off). In wider Asia, the Philippines is the only country that has ratified the instrument. Upon its establishment in 2011, Malaysia and Singapore were two of the eight member states that abstained from voting.[5] This signals the low priority of states in adopting ILO norms about the sector in general, let alone regulating PREAs dealing with them.

All four country cases are members of the Association of Southeast Asian Nations (ASEAN), which has formal instruments of dialogue to potentially take up issues to do with cross-border migration in the region. It has two formal declarations which express member states' commitment to improve the protection of migrant workers and affirm their rights. These are voluntary, non-legally-binding frameworks, however, and implementation is still left to individual countries, subject to compliance with national laws. The commitment to one of ASEAN's core principles of non-interference, which means non-intervention in sovereign matters of each member state, makes it extremely difficult to create transregional regulatory frameworks without the buy-in of dominant social forces, which of course include business interests (Auethavornpipat, 2017; Bal & Gerard, 2018; L. Jones, 2010).

In sum, PREAs are increasingly understood as important players in global migration governance. That their activities may cause harm to workers is generally not in dispute. The proposed solutions have been geared towards their socialisation—either as responsible stakeholders in the social dialogue model promoted by the ILO, or through more market-friendly disciplinary mechanisms that follow the logic of market efficiency. The efficacy of socialisation (i.e. a change in their behaviour) is premised on their voluntary cooperation. It can be difficult to practice ethical recruitment when the bottom line is at stake, and given the large power imbalance between PREAs and workers. Effective social dialogue is also difficult to achieve given the lack of representation of both employers and workers in decision-making processes. While the ASEAN declarations above and associated mechanisms include domestic workers, there is no dedicated regional mechanism devoted specifically to the sector. Such a mechanism is difficult to achieve when domestic workers are excluded from general labour laws of the country cases, except the Philippines.

[5] The others are the Czech Republic, El Salvador, Panama, Sudan, Thailand, and the United Kingdom.

6.2 Migrant Agency in "Low-Rights" Contexts

Migrant agency in Malaysia and Singapore are limited by the politically restrictive contexts which make it very difficult for non-citizens to politically organise. Policies that guarantee the transience of domestic workers also make it challenging to build lasting communities. Typical organisations that advocate for labour rights, i.e. trade unions, also have limited autonomy. Civil society spaces are tightly controlled, even for citizens and permanent residents. Migrant worker issues have historically been highly contentious, leading to the arrest of those who have been vocal advocates.

The Singapore National Trade Union Congress is state-aligned, limiting labour activism (Piper, 2006). Singapore's notion of civil society is explicitly "apolitical" (Yeoh & Huang, 1999, p. 1151), meant to reinforce affective ties to Singaporean identity. This means making distinctions between those who belong and those who do not. The so-called "Marxist Conspiracy" in 1987 also casts a long shadow over the issue of migrant rights. Twenty-two people were arrested under the Internal Security Act, accused of "political agitation" to "radicalise student and Christian activists" (Lyons, 2007, p. 109). While church and women's groups may offer services to marginalised groups, including domestic workers, fear of "politicisation" limits the kinds of activities and subjectivities that may form in them (Yeoh & Huang, 1999). The state may "co-opt" their agendas (Yeoh & Annadhurai, 2008, p. 556). Apart from aligning themselves with state preferences, these groups may even reinforce surveillance and control by "regulating" workers' behaviour in conformity to gendered expectations (Yeoh & Annadhurai, 2008, p. 567). In recent years, there have been advocacy groups whose explicit mission is to raise awareness about the living and working conditions of migrants in order to influence policy. Transient Workers Count Too (TWC2) and Humanitarian Organization for Migration Economics (HOME) are registered societies recognised by the state. These organisations have been successful in their public campaigns, for example the "Day Off" campaign, which led to the mandatory weekly rest day announced by the Ministry of Manpower in 2012. However, these groups are led by Singapore citizens and permanent residents, leaving little room for the agency of migrant workers themselves.

Like Singapore, the Malaysian state likewise restricts civil society and union activity. While the Malaysian Trade Union Congress has proposed the creation of domestic worker associations, migrant workers are either discouraged or barred from union membership (Elias, 2010b). There are of course limits to the union-centric models due to the gendered, informal and transnational nature of migrant domestic work. As such, migrant associations and non-governmental organisations do play an important role (Ford, 2004). Even then, the state restricts the political space in which these organisations may operate. The case of Tenaganita shows how the Malaysian state has little tolerance for "public discourse that casts its practices in a negative light" (Chin, 2003, p. 65). In 1995, Tenaganita's director Irene Fernandez published a report entitled "Abuse, Torture and Dehumanised Conditions of Migrant Workers in Detention Centres". She was subsequently charged with

publishing false news under the Printing Presses and Publications Act. She was found guilty in 2003 and acquitted in 2008 after appeals. The trial lasted seven years, the longest in Malaysia's history (Multinational Monitor, 2009). Like the Marxist Conspiracy, these highly-publicised crackdowns on the discussion of migrant issues create a chilling effect that could and has led to erstwhile advocates to inhibit themselves (Barr, 2010).

Further, those who advocate for international labour standards could be viewed as "pawns of the West" (Gurowitz, 2000, p. 864). Human rights discourse runs into Singapore and Malaysia's discursive plea for difference and "Asian values". This means giving greater priority to economic development over political or civil rights (Kraft, 2001). Nonetheless, "rights talk" function to uphold universal values that advocates claim are already embedded in the local constitution, i.e. asserting that migrants are not commodities, and appealing to their humanity (Elias, 2010b, p. 63). There are of course critiques that even the liberal human rights regimes predominant in the West are blind to the specificity of domestic work (i.e. social reproduction) taking place in the household (Elias, 2010a, p. 843). The non-recognition of the household as a workplace essentially privatises the structural problems of migrants, absolving the state of direct responsibility.

Nevertheless, migrant domestic workers have found ways to exercise agency even in these politically restrictive contexts. They may not be understood as such, when compared to conventionally recognised practices of political agency. Where it is illegal to join unions, where the employer's household is their residence and workplace, and where they may not always enjoy days off on weekends, migrants improvise with the available spaces and encounters they may have. Casual talk across balconies in neighbouring households are avenues to share information about salary and contracts, and even tips in negotiating leisure time (Pande, 2012). When they are allowed days off, churches and weekend enclaves may also serve as spaces for mutual support (Fernandez, 2014). In these informal networks, experienced workers pass on vital information to newcomers (Pande, 2014).

Agency may also take the form of social reproduction itself—i.e. activities geared towards the well-being and "empowerment" of workers. They reclaim their womanhood by participating in beauty contests, helping regain esteem and social status that are lost (Roces, 2022). Self-expression in art classes with other migrant domestic workers increases confidence and the feeling of agency (Jiang & Korczynski, 2019). Even the creation of TikTok videos can be seen as acts of resistance as workers share information, commiserate with each other, and produce a counter-culture in their leisure time (Chee, 2023). These activities may repair physical and psychological harm. This is important because everyday acts of humiliation and subordination not only secure compliance (i.e. docility), but may even lead workers to act against their own interests (Ellerman, 2017; Schumann & Paul, 2021).

6.3 Implications of the Study and Further Research

This book demonstrates how logics of power and action work in practice in neoliberal migration governance, given this specific labour market. I constructed an analytics with which to recognise social relations of power in the recruitment, training, and management of domestic workers. This fine-grained theoretical framework is able to recognise how different logics combine and re-combine to achieve specific purposes. International Relations scholars have of course acknowledged the "heterogeneity" of power forms in Foucault's body of work, and how power is exercised by actors other than the state. Vivienne Jabri identifies a "global matrix of war" in which sovereignty, discipline and biopower combine in the use of force, incarceration and torture in modern warfare (Jabri, 2010). In their analysis of the relationships between states and non-governmental organisations, Ole Sending and Iver Neummann acknowledge that because discipline and sovereignty are distinct forms of power, governmentality do not replace but rather reconfigured them (Sending & Neumann, 2006, p. 657).

The question is which appropriate rationality ought to be used to govern which actors or phenomena (Neumann & Sending, 2010, p. 11). However, they do not elaborate further about the different power forms, their relationships with each other (if any), and why it is important to note the distinctions. This may be why some portray governmentality as the overarching concept which contained the other forms. For example, Wanda Vrasti claims that governmentality is "shorthand for the historical transformation of modern power from the Middle Ages to the present (Vrasti, 2011, p. 11)". Some emphasise the importance of making conceptual distinctions (Guzzini & Neumann, 2012, p. 22; Kiersey et al., 2011, pp. xiv–xv). Failing to do so represents a totalised picture of global power relations, for example as depicted in *Empire,* where international order no longer rests on juridical power but on a "globalised biopolitical machine"(Hardt & Negri, 2000, p. 40). There is also the assumption that where one form of power exists, others could not, or that one form would give way to another depending on conditions (Joseph, 2010, 2014).

This book shows how sovereignty, discipline, biopower, and governmentality, are distinct, and have specific logics and actions. They may operate simultaneously in the same problem space. They form "complex edifices" (Foucault, 2007, p. 8) at various "levels of analysis", from households to the "international". Foucault's lifelong project has been to decentre power, and this process tends to make the international uneven and irreducible (Rosenow, 2009, p. 508). In empirical terms, this means that governmentality (e.g. the production of *homo economicus*) could and does emerge even where conditions of "advanced liberal societies" are absent. At the same time, quasi-feudal relations, which could arguably describe the relationship of domestic workers and employers, may exist even in the most advanced liberal societies. In any case, IR Foucauldians do not privilege sites of analysis as more real than others, because spatial and scalar categories are productions of power/knowledge.

Finally, the book opens up the black box of "market rule", which is far from a neutral arbiter of value—economic or otherwise. The globalising markets in migrant domestic work traffics in deeply-held ideologies about the nature of domestic work itself, and its place in modern societies. PREAs are market actors who not only commodify workers, but do so premised on conceptions of women as sexed and racialised beings with temporary migrant status. This case shows the limits of what aspects of our social lives may be subjected to the competition and efficiencies of market practice.

6.3.1 Growing Demand for "Women's Labour"

The ILO estimates that there are nearly 76 million domestic workers worldwide. This means that 1 in every 25 employees is a domestic worker (ILO, 2022c, p. xiii). This is a large and under-served labour sector, 75 percent of whom are excluded from general labour laws. Of the total, about 11 percent, over 8 million, are working in a country that is not their own (ILO, 2021, p. 59). The ten[6] countries of Southeast Asia are home to 2.2 million migrant domestic workers (ILO, 2023, p. 5). This is a sector that has continued to grow as more women enter paid employment, and societies age without adequate public investment in care. There are as yet no global estimates tracking the change in the number of migrant domestic workers over time, but the numbers in both Malaysia and Singapore have quadrupled in the last three decades. Malaysia was host to over 70,000 in the mid-1990s (Chin, 1997, p. 353), to as many as 300,000 in recent years (ILO, 2023, p. 23). In Singapore, the numbers have risen from about 80,000 (Huang & Yeoh, 1996, p. 484) to over 300,000 today (Ministry of Manpower, 2024).

The numbers in other world regions have also increased. Arab States host nearly 6.6 million domestic workers from Southeast Asia, South Asia, and Africa. The region has seen an annual growth rate of 8.7 percent over a ten-year period from the mid-2000s. Saudi Arabia, the largest receiving country, has tripled its numbers from 830,000 in 2007 to 2.42 million in 2017 (ILO, 2021, p. 37). The European Union (EU) estimates at least 12.8 million working in the "personal and household services" sector, one-sixth of whom are migrants from both within and outside the EU. The European Labour Authority (ELA) estimates that about half of the total are working undeclared (European Labour Authority, 2021, p. 2).

The demand for caring labour is expected to increase, given demographic changes. The United Nations estimates that nearly one-fifth of the world's population will be aged 65 and older by mid-century. Europe and North America will have the highest proportion at 26.9 percent. East and Southeast Asia is expected to have 25.7 percent (UN Department of Economic and Social Affairs, 2022). Without

[6] Brunei Darussalam, Cambodia, Indonesia, Laos, Malaysia, Myanmar, the Philippines, Singapore, Thailand, Vietnam.

adequate public investment in care, reproductive labour will continue to be a private expense for households. And without adequate regulatory mechanisms that centre worker's well-being, PREAs will continue to play an outsized role in the governance of the sector. This specific migration regime is predominant not only in migration corridors within Southeast Asia, but also within and across world regions (Awumbila et al., 2018; Chau, 2020; Fernandez, 2013; Handapangoda, 2024; Kern & Müller-Böker, 2015). It is a problem in global migration governance, which has costs both seen and unseen in both sending and receiving countries.

6.3.2 Avenues for New Research

Future studies may continue to empirically examine the role of PREAs in newer sending and receiving countries in Asia, and elsewhere. These may track continuity and change over place and time. Comparative studies might explain why PREAs are not present in Latin America and the Caribbean, even though there are migrant domestic workers working within and across these regions. The focus of inquiry could also be on how market norms diffuse or circulate across countries, or how PREAs socialise and are socialised to take up such norms.

There could also be historical investigations on attempts to make the recruitment and placement of domestic workers a public good—as shown by the case of the National Institute of Houseworkers in the United Kingdom (Horn, 2001). Fine-grained research into how PREAs behave as self-identifying stakeholders in domestic and/or international contexts could trace their impact on public policies in both domestic and international contexts. Large quantitative studies may track the emergence and growth of PREAs over time, in countries and regions, and to determine the relationship, if any, of the sending and receiving countries' policies impacting domestic social reproduction.

The use of technological platforms in matching employers and domestic workers gives a different dimension to the fraying of the employment relation in this sector (Rodríguez-Modroño et al., 2022; Yin, 2024). While they have been called the "original" gig workers, this has more to do with their conditions of informality rather than a new understanding of changes in the infrastructures and economies of mediation (Flanagan, 2019). How and why is this new organisational form different from the present and previous conditions which gave rise to PREAs? How and in what ways are these platforms part of the migration industry? What new logics of power and action emerge?

The ILO has recognised the importance of private recruitment in the lives of domestic workers (ILO, 1935), even though it has only recently invested in producing norms and standards to regulate the sector. There could be closer research into this process, evaluating its impacts or comparing effects in the country cases. This is important as the demand for domestic workers is expected to increase, as described above. The cross-border aspect of this phenomenon means that is a collective action

problem between national jurisdictions, and requires cooperation by various stakeholders.

Finally, migration scholars may further investigate aspects of neoliberal migration governance in other labour sectors. PREAs are active in sourcing migrant workers in agriculture (Bolokan, 2020), logistics (Sporton, 2013), fisheries (Stringer et al., 2021), factories (Chan, 2022), health care (Smith & Gillin, 2021), and others. As global production and supply chains continue to be disaggregated and segmented, PREAs are the obvious choice in providing a "just-in-time workforce", in the absence of intergovernmental cooperation. From the perspective of states, there are other benefits to off-shoring apart from purported efficiency gains. Issues of sovereignty conflicts between sending and receiving states may be skirted or avoided altogether, as well as state responsibility and liability on human rights issues, where these are seen as "cost". Arguably the diffusion or displacement of state regulation may itself be a "management strategy" (C. Chin, 2019, p. 532). The "temporary employment relation", in this instance of migrant domestic workers, legitimises the use of PREAs to manage the wage relation, even though they in essence treat workers like commodities (Vosko, 2000, p. 18).

References

Auethavornpipat, R. (2017). Assessing regional cooperation: ASEAN states, migrant worker rights and norm socialization in Southeast Asia. *Global Change, Peace & Security, 29*(2), 129–143. https://doi.org/10.1080/14781158.2017.1293021

Awumbila, M., Deshingkar, P., Kandilige, L., Teye, J. K., & Setrana, M. (2018). Please, thank you and sorry—Brokering migration and constructing identities for domestic work in Ghana. *Journal of Ethnic and Migration Studies, 0*(0), 1–17. https://doi.org/10.1080/1369183X.2018.1528097

Bach, S. (2003). International migration of health workers: Labour and social issues. WP.209. https://labordoc.ilo.org

Bal, C. S., & Gerard, K. (2018). ASEAN'S governance of migrant worker rights. *Third World Quarterly, 39*(4), 799–819. https://doi.org/10.1080/01436597.2017.1387478

Barber, P. G., Bryan, C., Barber, P. G., & Bryan, C. (2017). International Organization for Migration in the field: 'Walking the talk' of global migration management in Manila. *Journal of Ethnic and Migration Studies, 44*(10), 1725–1742. https://doi.org/10.1080/1369183X.2017.1354068

Barr, M. D. (2010). Marxists in Singapore?: Lee Kuan yew's campaign against Catholic social justice activists in the 1980s. *Critical Asian Studies, 42*(3), 335–362. https://doi.org/10.1080/14672715.2010.507389

Betts, A. (2013). The migration industry in global migration governance. In *The migration industry and the commercialization of international migration* (pp. 45–63). Routledge. https://doi.org/10.4324/9780203082737

Bolokan, D. (2020). Recruitment infrastructure within the agricultural and agrifood sector: Post-soviet and neocolonial entanglements between "eastern" and "Western" Europe. *Social Change Review, 18*(Winter), 39–77.

Carbonero, M. A., & Gómez Garrido, M. (2018). Being like your girlfriend: Authenticity and the shifting Borders of intimacy in sex work. *Sociology, 52*(2), 384–399. https://doi.org/10.1177/0038038516688609

Chan, S. K.-L. (2022). Transnational brokers and the desire for labour migration: Decision-making process of Myanmar migrant Workers in Thailand. *Journal of International Migration and Integration, 23*(4), 1987–2007. https://doi.org/10.1007/s12134-021-00915-0
Chau, H. S. (2020). *Brokering circular labour migration: A Mobile ethnography of migrant care workers' journey to Switzerland*. Routledge. https://doi.org/10.4324/9780429029905
Chee, L. (2023). Play and counter-conduct: Migrant domestic workers on TikTok. *Global Society, 37*(4), 593–617.
Chen, Y. (2021). Proliferation of transnational labour standards: The role of the ILO. In T. Halonen & U. Liukkunen (Eds.), *International Labour Organization and global social governance* (pp. 97–121). Springer International Publishing. https://doi.org/10.1007/978-3-030-55400-2_5
Chin, C. B. N. (1997). Walls of silence and late twentieth century representations of the foreign female domestic worker: The case of Filipina and Indonesian female servants in Malaysia 1. *International Migration Review, 31*(2), 353–385. https://doi.org/10.1177/019791839703100205
Chin, C. B. N. (2003). Visible bodies, invisible work: State practices toward migrant women domestic Workers in Malaysia. *Asian and Pacific Migration Journal, 12*(1–2), 49–73. https://doi.org/10.1177/011719680301200103
Chin, C. (2019). Precarious work and its complicit network: Migrant labour in Singapore. *Journal of Contemporary Asia, 49*(4), 528–551. https://doi.org/10.1080/00472336.2019.1572209
Elias, J. (2010a). Making migrant domestic work visible: The rights based approach to migration and the "challenges of social reproduction". *Review of International Political Economy, 17*(5), 840–859.
Elias, J. (2010b). Transnational migration, gender, and rights: Advocacy and activism in the Malaysian context. *International Migration, 48*(6), 44–71. https://doi.org/10.1111/j.1468-2435.2010.00619.x
Ellerman, M. L. (2017). The power of everyday subordination: Exploring the silencing and disempowerment of Chinese migrant domestic workers. *Critical Asian Studies, 49*(2), 187–206. https://doi.org/10.1080/14672715.2017.1299341
European Labour Authority. (2021). Tackling undeclared work in the personal and household services sector. https://www.ela.europa.eu/sites/default/files/2022-03/Study-report-on-personal-and-household-sector.2021_EN.pdf
Fernandez, B. (2013). Traffickers, brokers, employment agents, and social networks: The regulation of intermediaries in the migration of Ethiopian domestic workers to the middle east. *International Migration Review, 47*(4), 814–843. https://doi.org/10.1111/imre.12049
Fernandez, B. (2014). Degrees of (un)freedom: The exercise of agency by Ethiopian migrant domestic Workers in Kuwait and Lebanon. In B. Fernandez & M. de Regt (Eds.), *Migrant domestic Workers in the Middle East: The home and the world* (pp. 51–74). Palgrave Macmillan.
Flanagan, F. (2019). Theorising the gig economy and home-based service work. *Journal of Industrial Relations, 61*(1), 57–78. https://doi.org/10.1177/0022185618800518
Ford, M. (2004). Organizing the unorganizable: Unions, NGOs, and Indonesian migrant labour. *International Migration, 42*(5), 99–119. https://doi.org/10.1111/j.0020-7985.2004.00303.x
Foucault, M. (2007). *Security, territory, population: Lectures at the college de France 1977–1978*. Palgrave Macmillan.
Gabriel, C., & Macdonald, L. (2018). After the International Organization for Migration: Recruitment of Guatemalan temporary agricultural workers to Canada. *Journal of Ethnic and Migration Studies, 44*(10), 1706–1724. https://doi.org/10.1080/1369183X.2017.1354062
Geiger, M., & Pecoud, A. (2020). The International Organization for migration: The new "UN migration agency" in critical perspective. In *The International Organization for migration*. Palgrave Macmillan.
Gurowitz, A. (2000). Migrant rights and activism in Malaysia: Opportunities and constraints. *The Journal of Asian Studies, 59*(4), 863–888. https://doi.org/10.2307/2659215
Guzzini, S., & Neumann, I. B. (2012). *The diffusion of power in global governance: International political economy meets Foucault*. Palgrave Macmillan.

Handapangoda, W. S. (2024). The making of "passengers": The pre-departure subjectivation of Sri Lanka's aspiring migrant domestic workers heading to the Arabian gulf. *Global Society, 38*(2), 248–268. https://doi.org/10.1080/13600826.2023.2263886

Hardt, M., & Negri, A. (2000). *Empire*. Harvard University Press. https://www.bol.com/nl/nl/f/empire/30181755/

Helmke, G., & Levitsky, S. (2012). *Informal institutions and comparative politics: A research agenda*. Edward Elgar.

Holliday, J., & Man, J. (2020). Improved migration governance (IMG) project: Protecting the rights of migrant domestic workers and plantation workers through improved labour migration governance (final progress report). https://webapps.ilo.org/ievaldiscovery/#b3v85ob.

Hong Kong Federation of Asian Domestic Workers Unions. (2018). *Agents of change?: Assesing Hong Kong employment agencies' compliance with the code of practice*. FADWU. https://www.fairrecruitmenthub.org/resources/agents-change-assessing-hong-kong-employment-agencies-compliance-code-practice

Hooper, K. (2023). *Consolidating gains: Lessons and priorities for promoting fair and ethical recruitment*. Migration Policy Institute.

Horn, P. (2001). Experiment or anachronism? The role of the National Institute of Houseworkers. *Labour History Review, 66*(1), 61–78. https://doi.org/10.3828/lhr.66.1.61

Huang, S., & Yeoh, B. S. A. (1996). Ties that bind: State policy and migrant female domestic helpers in Singapore. *Geoforum, 27*(4), 479–493.

Huang, S., & Yeoh, B. S. A. (1998). Maids and Ma'ams in Singapore: Constructing gender and nationality in the transnationalization of paid domestic work. *Geography Research Forum, 18*, 21–48.

ILO. (1935). *Regulation of certain special systems of recruiting workers: Questionnaire*. ILO.

ILO. (2004). Resolution concerning a fair deal for migrant workers in a global economy. 92nd International Labour Conference, Geneva. https://www.ilo.org/resource/resolution-concerning-fair-deal-migrant-workers-global-economy

ILO. (2014). *Synopsis on the status of migration for employment with a focus on return and reintergration: Policy to practice*. https://labordoc.ilo.org/discovery/delivery/41ILO_INST:41ILO_V2/1282206790002676

ILO. (2021). *Making decent work a reality for domestic workers: Progress and prospects ten years after the adoption of the Domestic Workers Convention, 2011 (No. 189)*. ILO.

ILO. (2022a). *Achieving fair and ethical recruitment: Improving regulation and enforcement in the ASEAN region*. ILO. https://www.ilo.org/publications/achieving-fair-and-ethical-recruitment-improving-regulation-and-enforcement

ILO. (2022b). *Compendium of promising practices to advance fair recruitment of (migrant) workers*. https://labordoc.ilo.org/discovery/delivery/41ILO_INST:41ILO_V2/1290126980002676

ILO. (2022c). *Making the right to social security a reality for domestic workers the right to social security a reality for domestic workers: A global review of policy trends, statistics and extension strategies*. International Labour Organization.

ILO. (2023). *Skilled to care, forced to work? Recognizing the skill profiles of migrant domestic workers in ASEAN amid forced labour and exploitation*. ILO.

ILO. (2024). *Fair recruitment initiative: Paving the way for decent work: Celebrating 10 years of progress*. ILO. https://labordoc.ilo.org

IOM. (2019). *IRIS Standard, version 1.2, 2019*. IOM. https://iris.iom.int/iris-standard

Jabri, V. (2010). *War and transformation of global politics*. Palgrave Macmillan.

Jiang, Z., & Korczynski, M. (2019). The art of labour organizing: Participatory art and migrant domestic workers' self-organizing in London. *Human Relations, 74*(6), 842–868.

Jones, L. (2010). Asean's unchanged melody? The theory and practice of "non-interference" in Southeast Asia. *Pacific Review, 23*(4), 479–502. https://doi.org/10.1080/09512748.2010.495996

Jones, K. (2022). A 'north star' in governing global labour migration? The ILO and the fair recruitment initiative. *Global Social Policy, 22*(2), 303–322. https://doi.org/10.1177/14680181221084792

Joseph, J. (2010). The limits of governmentality: Social theory and the international. *European Journal of International Relations, 16*(2), 223–246. https://doi.org/10.1177/1354066109346886

Joseph, J. (2014). *The social in the global: Social theory, governmentality and global politics*. Cambridge University Press.

Kern, A., & Müller-Böker, U. (2015). The middle space of migration: A case study on brokerage and recruitment agencies in Nepal. *Geoforum, 65*, 158–169. https://doi.org/10.1016/j.geoforum.2015.07.024

Kiersey, N. J., Stokes, D., & Weidner, J. R. (2011). *Foucault and international relations: New critical engagements*. Routledge. https://www.routledge.com/Foucault-and-International-Relations-New-Critical-Engagements/Kiersey-Stokes/p/book/9780415847759

Kraft, H. J. S. (2001). Human rights, asean and constructivism: Revisiting the "asian values" discourse. *Philippine Political Science Journal, 22*(45), 33–54. https://doi.org/10.1080/01154451.2001.9754224

Ladegaard, H. J. (2019). Reconceptualising 'home', 'family' and 'self': Identity struggles in domestic migrant worker returnee narratives. *Language and Intercultural Communication, 19*(3), 289–303. https://doi.org/10.1080/14708477.2018.1509984

Lyons, L. (2007). Dignity overdue: Women's rights activism in support of foreign domestic Workers in Singapore. *Women's Studies Quarterly, 35*(3/4), 106–122.

Mahdavi, P. (2013). "Trafficking" parenting: Migration, motherhood, forced labor and deportability in The United Arab Emirates (UAE). *Middle East Law and Governance, 5*(1–2), 173–194. https://doi.org/10.1163/18763375-00501005

Ministry of Manpower. (2024). Foreign workforce numbers. https://www.mom.gov.sg/foreign-workforce-numbers

Morris, C., Dalavong, S., Oo, A. T., & Ngoc, T. (2024). TRIANGLE in ASEAN: Safe and fair labour migration (evaluation). https://webapps.ilo.org/ievaldiscovery/#bvgabz2

Multinational Monitor. (2009, February). Fernandez' Freedom. *Multinational Monitor, 30*(1), 4.

Murray, U. (2017). *Global action programme on migrant domestic workers and their families—Final evaluation*. ILO Evaluation. https://wwwex.ilo.org/dyn/eitrack/files/file/186188

Musgrave, R. A. (1974). On social goods and social bads. In R. Marris (Ed.), *The corporate society* (pp. 251–293). Macmillan Education. https://doi.org/10.1007/978-1-349-01977-9_9

Neumann, I. B., & Sending, O. J. (2010). *Governing the global polity: Practice, mentality, rationality*. University of Michigan Press.

Nyberg–Sørensen, N., Hear, N. V., & Engberg–Pedersen, P. (2002). The migration–development nexus: Evidence and policy options. *International Migration, 40*(5), 49–73. https://doi.org/10.1111/1468-2435.00211

OECD, & Organization, W. H. (2020). *Health at a glance: Asia/Pacific 2020: Measuring progress towards universal health coverage*. OECD. https://doi.org/10.1787/1ad1c42a-en

Pande, A. (2012). From "balcony talk" and "practical prayers" to illegal collectives: Migrant domestic workers and meso-level resistances in Lebanon. *Gender and Society, 26*(3), 382–405. https://doi.org/10.1177/0891243212439247

Pande, A. (2014). Forging intimate and work ties: Migrant domestic workers resist in Lebanon. In *Migrant domestic workers in the Middle East: The home and the world* (pp. 27–49). Palgrave Macmillan.

Piper, N. (2006). Migrant worker activism in Singapore and Malaysia: Freedom of association and the role of the state. *Asian and Pacific Migration Journal, 15*(3), 359–380. https://doi.org/10.1177/011719680601500304

Pittman, P. (2016). Alternative approaches to the governance of transnational labor recruitment. *International Migration Review, 50*(2), 269–314. https://doi.org/10.1111/imre.12164

Rahman, M. M., & Lian, K. F. (2009). Gender and the remittance process: Indonesian domestic workers in Hong Kong, Singapore and Malaysia. *Asian Population Studies, 5*(2), 103–125.

Roces, M. (2022). Sunday Cinderellas dress and the self-transformation of Filipina domestic workers in Singapore, 1990s—2017. *International Quarterly for Asian Studies, 531*(1), 121–142.

Rodríguez-Modroño, P., Agenjo-Calderón, A., & López-Igual, P. (2022). Platform work in the domestic and home care sector: New mechanisms of invisibility and exploitation of women migrant workers. *Gender and Development, 30*(3), 619–635. https://doi.org/10.1080/13552074.2022.2121060

Rosenow, D. (2009). Decentring global power: The merits of a foucauldian approach to international relations. *Global Society, 23*(4), 497–517. https://doi.org/10.1080/13600820903198891

Schumann, M. F., & Paul, A. M. (2021). The giving up of weekly rest-days by migrant domestic workers in Singapore: When submission is both resistance and victimhood. *Social Forces, 98*(4), 1695–1718. https://doi.org/10.1093/SF/SOZ089

Sending, O. J., & Neumann, I. B. (2006). Governance to governmentality: Analyzing NGOs, states, and power. *International Studies Quarterly, 50*(3), 651–672. https://doi.org/10.1111/j.1468-2478.2006.00418.x

Smith, D. M., & Gillin, N. (2021). Filipino nurse migration to the UK: Understanding migration choices from an ontological security-seeking perspective. *Social Science & Medicine, 276*, 113881. https://doi.org/10.1016/j.socscimed.2021.113881

Sporton, D. (2013). "They control my life": The role of local recruitment agencies in east European migration to the UK. *Population, Space and Place, 19*(5), 443–458. https://doi.org/10.1002/psp.1732

Stringer, C., Kartikasari, A., & Michailova, S. (2021). 'They make a business out of desperate people': The role of recruitment agents in cross-border labour chains. *Australian Journal of Management, 46*(4), 672–689. https://doi.org/10.1177/0312896220986895

UN Department of Economic and Social Affairs. (2022). *World population prospects 2022* (UN DESA/POP/2021/TR/NO. 3). United Nations.

van Naerssen, T., Smith, L., Davids, T., & Marchand, M. (2016). *Women, gender, remittances and development in the global south*. Routledge. https://doi.org/10.4324/9781315546629

Vosko, L. (2000). *Temporary work: The gendered rise of a precarious employment relationship*. University of Toronto Press. https://utorontopress.com/9780802083340/temporary-work

Vrasti, W. (2011). Universal but not truly 'global': Governmentality, economic liberalism, and the international. *Review of International Studies, 3*(2013), 1–21. https://doi.org/10.1017/S0260210511000568

Wee, V., & Sim, A. (2004). Transnational networks in female labour migration. In E. Ananta & A. Arrifin (Eds.), *International migration in Southeast Asia* (pp. 168–198). Institute of Southeast Asian Studies.

Wichterich, C. (2020). Who cares about healthcare workers? Care extractivism and care struggles in Germany and India. *Social Change, 50*(1), 121–140. https://doi.org/10.1177/0049085719901087

Williams, F. (2010). Migration and care: Themes, concepts and challenges. *Social Policy and Society, 9*(3), 385–396. https://doi.org/10.1017/S1474746410000102

Yeoh, B. S. A., & Annadhurai, K. (2008). Civil society action and the creation of "transformative" spaces for migrant domestic Workers in Singapore. *Women's Studies, 37*, 548–569. https://doi.org/10.1080/00497870802165502

Yeoh, B. S. A., & Huang, S. (1999). Spaces at the margins: Migrant domestic workers and the development of civil Society in Singapore. *Environment and Planning A, 31*(7), 1149–1167. https://doi.org/10.1068/a311149

Yin, S. (2024). Situating platform gig economy in the formal subsumption of reproductive labor: Transnational migrant domestic workers and the continuum of exploitation and precarity. *Capital & Class, 48*(1), 119–133. https://doi.org/10.1177/03098168221145407

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