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**Mobilizing the Right to Education for Domestic
Workers in Indonesia**

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List of Acronyms

| | |
|-------------|---|
| BLK | Balai Latihan Kerja (Vocational Training Center) |
| BPJS | Badan Penyelenggara Jaminan Sosial (Social Insurance Administration Organization) |
| C189 | International Labor Organization Domestic Workers Convention No. 189 concerning decent work for domestic workers |
| DPR | Dewan Perwakilan Rakyat (House of Representatives) |
| DPRD | Dewan Perwakilan Rakyat Daerah (Local People's Representative Council) |
| DW school | Domestic Worker School |
| FDPY | Forum Diskusi Perempuan Yogyakarta (the Yogyakarta Women's Discussion Forum) |
| GAATW | Global Alliance Against Traffic in Women |
| IDWF | International Domestic Workers Federation |
| ILO | International Labor Organization |
| Jakerla PRT | Jaringan Kerja Layak Pekerja Rumah Tangga (Indonesian Advocacy Network for DW Convention) |
| JALA-PRT | Jaringan Nasional Advokasi Pekerja Rumah Tangga (National Network for Domestic Workers Advocacy) |
| JARAK | Jaringan Nasional Pekerja Anak (National Network for child labor elimination) |
| KAPRT | Jaringan Komite Aksi Pekerja Rumah Tangga (Domestic Workers Action Committee Network) |
| KAPPRTBM | Komite Aksi Perlindungan Pekerja Rumah Tangga dan Buruh Migran (Coalition for action - Protection of Domestic and Migrant Workers Action Committee) |
| LBH APIK | Lembaga Bantuan Hukum Asosiasi Perempuan Indonesia Untuk Keadilan (Indonesia Legal Aid Association for Women) |
| NGO | Non-governmental Organization |
| PBI | Penerima Bantuan Iuran (Contribution Assistance Recipients) |
| R201 | Recommendation 201 Concerning Decent Work for Domestic Workers |
| RUMPUN | Forum Perempuan Tjoet Njak Dien (Tjoet Njak Dien Foundation) |
| RUU PPRT | Rancangan Undang-Undang tentang Perlindungan Pekerja Rumah Tangga (Domestic Workers Protection Bill) |
| Sakernas | Survei Angkatan Kerja Nasional (National Labor Force Survey) |
| SPRT | Serikat Pekerja Rumah Tangga (Domestic Workers Union) |

Abstract

This study evaluates the role of the National Domestic Workers Advocacy Network (JALA-PRT) in mobilizing domestic workers' right to education through a socio-legal framework of legal mobilization. Female domestic workers often experience an imbalance in power dynamics with their employers because employers tend to devalue their work and lower their opportunities to develop themselves, which exacerbates gender-based disparities. By translating International Labor Organization Domestic Workers Convention No. 189 concerning decent work for domestic workers (C189) into the local context, this research aims to uncover how vernacularization addresses domestic workers' issues and empowers them, particularly through skill-enhancing education that improves their bargaining power. The qualitative analysis examines JALA-PRT's framing of domestic workers issues, evaluates vernacularization strategies that they applied including policy advocacy, organizing and unionizing, building networks, domestic worker schools and various trainings, and assesses these strategies' achievements and limitations. Further, it describes existing structural biases and how to overcome them. The findings contribute to critical discussions on structural biases within human rights discourses and underscore the importance of locally adapted, gender-aware vernacularization for marginalized groups.

Keywords

Domestic workers; legal mobilization; JALA-PRT (National Network for Domestic Workers Advocacy); gender perspective; right to education; vernacularization.

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While compiling this research paper, honestly my feelings are mixed. While completing my studies, my mind is also disturbed by what has happened in the world lately. The more I research and find out, the sadder and smaller I feel. The more chaotic, the more I realize the gaps that exist and how humans become wolves to each other. I have been at a point where I felt helpless, but from that process of inner chaos, I remembered my motivation to study the field of law, human rights, gender and development studies. I want to humanize myself and the people around me. Although I still feel small, I believe that filling a small role for me is meaningful enough if it continues and grows. I want to help so that we can live side by side in peace, safety, comfort and equality. I want this hope to continue to survive because human rights work is work that comes from hope. I want to be one of the hopes for myself and others to believe that peace, tolerance, freedom, care, empathy and human values still exist. That law and our actions can help us create a better world. That joint efforts and collective awareness can be our strength to challenge injustice. It may sound naive and idealistic, but a glimmer of hope and starting from small actions is where all can progress.

Although I cannot help with big things, I want to be able to help "the invisible become more visible." I want to help by researching and making it more understandable and acceptable to various parties, especially the community, so that it can be implemented. This is where I will continue my part in "humanizing research" because often research cannot reach the community and creates a gap, so they are also not interested and do not believe it. Although I am aware that there are still many things that I do not know, therefore I want to always be able to develop my knowledge and abilities. I often fight with my mind. But through the learning process here, I continue to spur myself to be more critical, gain more knowledge and perspective, and be more courageous in expressing my opinion. I am not only a passive listener, but here I am an active listener and my opinion is also heard. However, even at this stage I still often feel lacking and afraid of being wrong. However, with the help of the people around me and (thankfully) my resilience, I was finally able to complete this stage of the learning process.

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Chapter 1

The Steep Road of Domestic Workers in Indonesia

This chapter explains the challenges for domestic workers in accessing education. Then, it continues with the justification and relevance of this study to development studies. Additionally, it demonstrates the importance of fighting for the right to education for domestic workers including an explanation of the JALA-PRT profile. It closes with the research question.

1.1 Barriers to Education for Domestic Workers

Factsheet on Domestic Workers in Indonesia (ILO, 2015a) stated that 90% of domestic workers in Indonesia are dominated by women from low-income families in rural areas. They are said in this factsheet to be domestic workers because this form of employment does not require formal training. Amnesty International (2007, p.6) states that domestic work is the easiest option for poor, unskilled girls and women with limited education seeking paid work. The perception that specific skills are not needed to become domestic workers has led to a tendency that they do not need to be given basic and quality education (D'Souza, 2010, p.1). Most domestic workers have a low level of education (no more than primary school level) with ages ranging between 13 and 30 years and most are single. In line with that, the National Labor Force Survey (Sakernas) conducted by BPS-Statistics Indonesia from 2012 to 2015 mentioned that more than 63% of domestic workers in Indonesia are educated below junior high school level and only 15% have reached high school (Yuliasuti, 2017, p.118). Other interesting data from the study is the phenomenon of domestic workers who choose to go to school while working, although in small numbers and some said that paying for school fees is a motivation to work as domestic workers (*ibid.*). This data shows some domestic workers have the awareness to pursue higher education.

Furthermore, the low level of education of domestic workers has an impact on their minimal ability to receive information, so they do not understand their rights (Samodra, Solechan, Suhartoyo, 2019, p.628) and orders from employers (Dwiyanti, 2011, p.65). It also perpetuates power relations between employers and domestic workers which gives employers stronger power because they come from a higher class than domestic workers who are considered lower-class citizens (*ibid.*, p.64; Pelupessy, 2017, p.232). As a result, employers often provide oppressive regulations and act arbitrarily, such as unclear working hours and unequal wages, without resistance from domestic workers (Dwiyanti, 2011, p.64). Khotimah (2015, p.158) then explores the long-term impact, namely the increasing number of women working in the informal sector which perpetuates poverty and gender discrimination due to the lack of legal protection and adequate welfare guarantees, poor working conditions and low incomes as they cannot understand and fight for their rights.

In connection with the problems experienced by domestic workers, the ILO has issued Domestic Workers Convention No. 189 concerning decent work for domestic workers (C189) to provide domestic workers with legal protection and rights and ensure that domestic workers enjoy the same basic labor rights as other workers (ILO, 2011a). One of the things regulated in it also concerns the right to education, as stated in Article 4(2) C189 that "Each Member shall take measures to ensure that work performed by domestic workers who are under the age of 18 and above the minimum age of employment does not deprive them of compulsory education, or interfere with opportunities to participate in further education or

vocational training." Therefore, access to education and training for them remains important and is a basic right that needs to be fulfilled globally.

Even though there are universal provisions, up to now there are no provisions at the national level in Indonesia that guarantees education and training for domestic workers. Although Indonesia has Law Number 13 of 2003 concerning Manpower and Minister of Manpower Regulation No. 2 of 2015 concerning the Protection of Domestic Workers, both have not yet regulated domestic workers' education and training provisions. Hanifah in Hatmanti (2023, p.4) argues that Law Number 13 of 2003 concerning Manpower "was intended to stipulate standard rights for workers in Indonesia, but failed to cover domestic workers in their scope, as their work is not considered to produce tangible objects or services that provide added value to the economy." Besides, Minister of Manpower Regulation No. 2 of 2015 concerning the Protection of Domestic Workers only regulates employment agreements, wages, rest periods, working hours and protection from abuse. Yet this Ministerial Regulation also has no binding legal force because of its nature as an implementer of the provisions of the legislation above it (Ubaiyana and Fitriah, 2021, p.612). At the same time, no law regulates protection for domestic workers. In response to these shortcomings, provisions regarding education and training are proposed in the Domestic Worker Protection Bill (RUU PPRT). This bill has been proposed since 2004 but has not been passed until now.

RUU PPRT highlights the importance of education and training as part of the protection of domestic workers (Article 6).

"Increasing efforts to protect domestic workers cannot be separated from training to improve their professionalism. Training is an effort to equip, improve, and develop work competencies to improve prospective and existing domestic workers' abilities and competencies through improving life skills. Training also empowers them as members of the community so that they can be more useful to themselves personally and to the environment in which they are located. With the training provided, it is hoped that there will be an increase in the knowledge and awareness of domestic workers about their status as workers, the problems they face, and the importance of taking action to change their fate, including by doing housework optimally."

Furthermore, Article 18(3) of the RUU PPRT defines education and training as an effort to equip, improve, and develop knowledge about work relations, competencies, and norms that follow the workplace context. So based on this article, what education and training means is not formal education, but a way to improve skills and performance and strengthen their bargaining power in the labor market. This definition will also be used as a reference for analysis in this study as a means of the right to education for domestic workers.

However, the definition also does not explain what education and training domestic workers need or whether certain standards regarding the skills they need exist. Therefore, a translation of the right to education for domestic workers is necessary so that it can be implemented in Indonesian local conditions by considering the social, cultural and economic conditions faced by them. In the framework of human rights, Merry (2006a, pp.39-45) discusses vernacularization which is a process of translating international norms into forms that are understood and can be followed up locally, which is important for advancing legal mobilization by raising the interests of marginalized communities. Moreover, as a component of legal mobilization, vernacularization helps local actors frame their demands in a way that can be understood and challenges injustice to bridge the gap between global and local rights frameworks (ibid.).

In connection with this, the government is the main duty bearer to guarantee and fulfill the obligation of education and training for domestic workers. Nevertheless, in practice, the grassroots organization, the National Domestic Workers Advocacy Network (JALA-PRT), is the main driver in the legal mobilization to ensure that education and training for domestic

workers are recognized and fulfilled progressively. JALA-PRT also tries to carry out vernacularization through efforts such as organizing and unionizing, domestic worker school and various trainings, and developing a network. Yet, JALA-PRT's efforts in mobilizing the right to education for domestic workers face various challenges, such as limited resources as well as gender gaps and structural biases inherent in the international and national legal systems. For example, JALA-PRT's efforts in advocating for the Domestic Worker Protection Bill since 2004 have been stagnant and have not been passed. It also raises questions about the effectiveness of their legal mobilization strategies. Although LBH APIK (2024) highlights that the obstruction of the RUU PPRT in the House of Representatives (DPR) is inseparable from the lack of political will due to the lack of attention to gender issues and the large number of DPR members who are employers, so there is a bias towards domestic workers. In addition, gender bias in international law often marginalizes women and limits their space to fight for their rights, including the right to education.

1.2 Justification and Relevance of This Research

Studies on labor and employment rights often highlight the importance of worker organizing and grassroots networks in influencing policy and legal frameworks for promoting workers' rights (Anner, 2019; Jordhus-Lier, 2017; Luce, 2014). In connection with this role, this study will evaluate JALA-PRT's role in advancing domestic workers' rights in Indonesia which has not been critically analyzed. Some of the existing literature only discusses the concept of decent working conditions from the perspective of domestic workers (Hatmanti, 2023), legal protection of domestic workers' rights (Fajrianto, 2023; Azhari and Halim, 2021; Samodra, Solechan and Suhartoyo, 2019), organizing domestic workers (Ujianto, 2019) and recognizing domestic workers as workers (Jordhus-Lier, 2017).

The role of JALA-PRT in this study showed how legal mobilization can be a tool to push for more inclusive and equitable policy changes. One of the efforts made by JALA-PRT is to vernacularize the right to education. Vernacularization is a form of legal mobilization that adapts international human rights norms to fit local contexts, making them accessible and relevant to marginalized groups (Merry, 2006a, p.55), like female domestic workers. The purpose of this research is to examine how this right is locally adapted as part of legal mobilization efforts, evaluating both practical applications and gender dynamics. This approach will also help to identify the limitations of gender perspective in legal systems that historically exclude women and how local advocacy networks address this gap in their advocacy work. Moreover, examining the role of civil society organizations and legal mobilization in influencing public policy and social change reflects the relevance of this study to the dynamics of social organizing in the development process.

1.3 Gaps in Education Rights for Domestic Workers

ILO (2024) estimates that women make up 75 percent of the 75.6 million domestic workers worldwide. Specifically, in the Indonesian context, the latest data from the ILO and Universitas Indonesia survey (ILO, 2015b), recorded that 4 million Indonesians work as domestic workers, with the majority being women 74%, and most of them come from rural areas and have low education. Apart from that, in practice, 25% of existing domestic workers are minors (not yet 18 years old). Considering the remarkably high number of women, the rights of domestic workers are a key strategy for achieving gender equality.

Domestic workers are one of the most vulnerable and marginalized groups of workers (ILO, 2011a), including in Indonesia. The International Labor Organization (ILO) defines

domestic workers as "any person engaged in domestic work within an employment relationship" (*ibid.*). Nevertheless, Indonesian citizens and the government do not formally recognize domestic workers as workers. According to some experts, this is because such work is often associated with womanhood and is less valued (Jaringan Nasional Advokasi Pekerja Rumah Tangga, The Global Alliance Against Traffic in Women and Institut Pekerja Domestik-Pekerja Rumah Tangga, 2020, pp.70-71). However, domestic workers contribute to the social and economic life of society. Because domestic workers carry out household tasks, their employers can carry out social and economic activities outside the home in various work sectors (ILO, 2015b). Nevertheless, many people still do not respect the importance of their existence because we devalue their work status and do not understand their rights (Amnesty International, 2007, p.4).

Domestic workers experience multiple layers of exclusion and discrimination due to the intersectionality between gender, class, ability, and mobility. For instance, a survey conducted by JALA-PRT in 6 (six) cities of 4296 domestic workers (2019) revealed that 89% of domestic workers do not receive health insurance as participants in Contribution Assistance Recipients (PBI) and 99% do not have employment social security. The reason is that domestic workers, mostly women, are seen as lower-class citizens with low ability and limited mobility, as many live in the employer's house, and they lack strong legal and social protection (Komisi Nasional Anti Kekerasan terhadap Perempuan, 2022). This problem is the impact of structural disparities that perpetuate the marginalization of female domestic workers and allow them to be helpless so they do not demand their rights as workers (Sujito, 2022, pp.7-9).

Additionally, because their work is carried out at home or in the private sphere, which is still considered a non-workplace, their employment relationship is not protected by national labor laws or other laws; since they are not recognized as workers, they are not formally entitled to labor protection in terms of Indonesian law (Fajrianto, 2023, p.152). It has been argued that recognizing them as workers would be a major step to ensure the fulfillment of their basic rights as workers who have been neglected and would improve the welfare and dignity of domestic workers (Marchetti, Cherubini, and Garofalo, 2021, p.55).

The debate around domestic workers' protection is not new. Marchetti, Cherubini, and Garofalo (2021, p.11) explained that the feminist debate regarding reproductive labor began in the 1960s in the form of critical discussions relevant to the rights of domestic workers. This debate has highlighted the unique nature of women's oppression in the political economy of capitalist society. Feminists have long challenged assumptions around reproductive labor in capitalist economies and equated it with productive labor. They argue that reproductive labor should also be valued for its social and economic contribution to society (*ibid.*, p.11).

Fish in Marchetti, Cherubini, and Garofalo (2021, p.7) argues that the mobilization of domestic workers challenges and bridges the boundaries between the labor movement, feminist struggle, and identity-based activism. In this regard, trade unions, associations and networks led by women in this sector are key players capable of politicizing domestic workers and advocating for their rights nationally and globally. They represent the collective action of workers facing economic and symbolic exclusion, fighting for labor rights, gender equality, human dignity and social recognition (*ibid.*, p.7). In line with this, Jordhus-Lier (2017, p.246) argues that domestic worker organizations in Indonesia are a rights-based mobilization in the workplace and the political field.

Lita Anggraini (2024) states that the legal mobilization of domestic workers began with the activities of women activists in Yogyakarta in the early 1990s and was continued by the formation of local workers' unions in several cities and the existence of JALA-PRT. Pratiwi (2021) noted that the establishment of JALA-PRT was initiated by the Rumpun Tjoet Njak

Dien Foundation (RUMPUN) and the Yogyakarta Women's Discussion Forum (FDPY) by focusing more on policy advocacy efforts related to the protection of domestic workers and the organization of women domestic workers in the Special Region of Yogyakarta, Indonesia. Seeing the situation during the mentoring and advocacy, RUMPUN feels that the issue of domestic workers must be a movement and a common concern at the national level. Until now, they consist of 42 organizations including domestic worker unions, individual domestic workers, activists, women's organizations, civil society organizations, and feminist organizations. JALA-PRT has three main objectives: advocating for the rights of domestic workers through the Domestic Workers Protection Bill (RUU PPRT), organizing and educating domestic workers, and the third is to conduct a public campaign regarding the decent work situation and the rights of domestic workers (Pratiwi, 2021). Thus, JALA-PRT is an ideal focus of this research because it has pioneered efforts in advocating for domestic workers' rights in Indonesia and its multifaceted approach to legal mobilization, specifically on educational rights as a path to empowerment. This organization's targeted strategies and impact at both community and policy levels make it a significant case study to examine how legal mobilization translates workers' educational rights into actionable change in a structurally biased legal system. Unlike other organizations that may focus primarily on unionizing or legal aid, JALA-PRT makes worker education one of its main goals.

Anggraini (2024) also explains that JALA-PRT carries out its activities with reference to C189 to strengthen its steps in policy advocacy. In addition, Indonesia has not ratified the convention. While the convention provides a sturdy foundation, the biggest challenge lies in translating it into the context of inclusive and equitable local policies. Against this background, this study is important to fill the gap regarding the evaluation of legal mobilization strategies for the rights of domestic workers in Indonesia, especially the right to education. This study will analyze how JALA-PRT translates the right to education contained in C189 into their strategies and tactics, as well as evaluate JALA-PRT's efforts in overcoming existing legal limitations and biases, including gender bias so that it can be known what needs to be improved so that the implementation of the right to education is more inclusive for domestic workers. Accordingly, this study aims to provide knowledge on the barriers faced in mobilizing the right to education for domestic workers in Indonesia.

1.4 Objectives and Research Questions

1.4.1 Objectives

As alluded to in the previous section, this research aims to evaluate legal mobilization efforts implemented by JALA PRT to advance domestic workers' educational rights in Indonesia by vernacularizing C189, assessing the effectiveness of its strategies, addressing structural biases and examining the impact on gendered power dynamics.

Sub-objectives:

- a. to understand JALA-PRT's framing of the issue based on C189 to resonate with the local context, including socio-political, economic and cultural conditions in Indonesia's landscape;
- b. to evaluate the effectiveness and challenges of specific strategies implemented by JALA-PRT, such as organizing and unionizing, domestic worker schools and various training developing networks and advocating policy change; and
- c. to examine JALA-PRT's approach to overcoming structural barriers that affect domestic workers by underlying assumptions, power dynamics and institutional preferences.

1.4.2 Research Question

Main Question:

How has the National Network for Domestic Workers Advocacy (JALA-PRT) utilized legal mobilization to promote the right to education for domestic workers in Indonesia?

To answer the main question, I divided into four research sub-questions:

- 1) How has JALA-PRT specifically framed domestic workers' right to education issues in mobilizing C189 provisions in Indonesia?
- 2) What have been the achievements and limitations of JALA-PRT's strategies in vernacularizing education rights for domestic workers?
- 3) How has JALA-PRT addressed structural biases within Indonesia's local context in its legal mobilization?

1.5 Chapter Overview

In the next chapter, I describe the theories that underlie the analysis in this study. Then, in the third chapter, I discuss the data collection methods along with the ethical and positionality considerations that I use. In the fourth chapter, I describe how JALA-PRT's framing of the issue based on C189 resonates with the local context, including socio-political, economic and cultural conditions in Indonesia's landscape. The fifth chapter evaluates the effectiveness and challenges of specific strategies implemented by JALA-PRT, such as organizing and unionizing, domestic worker schools and various training developing networks and advocating policy change. The sixth chapter examines JALA-PRT's approach to overcoming structural barriers that affect domestic workers. The seventh chapter evaluates the gender justice perspective, questioning if women domestic workers' involvement in JALA-PRT's initiatives has changed power relations or maintained systemic biases. Next, the eighth part is the conclusion of this research.

Besides, limitations include focusing solely on Indonesian domestic workers, data from JALA-PRT affiliates, C189 as an international legal reference and the scope restricted to educational rights that develop their agency and skills in the workplace. I also realize that the domestic workers involved in this study are those who are still reachable and are participants in the JALA-PRT program, so they cannot truly represent the conditions of all domestic workers in Indonesia. There are still many domestic workers who do not join organizations or labor unions. In addition, the number of research participants in this study is also limited and their opinions certainly represent the experiences and what is felt by each, so there is still a possibility that some dynamics have not been captured.

Chapter 2

Conceptual Framework

This chapter provides the theoretical and conceptual framework of this research. The first section is about the right to education and the second is legal mobilization based on the sociolegal approach. The right to education framework focuses on empowering domestic workers specifically to enhance their skills and agency in the workplace rather than providing formal education, in line with the educational approach implemented by JALA-PRT. This concept clarifies what kind of education should be given to domestic workers to make them empowered. This approach also aligns with the sociolegal perspective on legal mobilization, centering around worker empowerment within employee contexts rather than conventional academic learning. The second section introduces a legal mobilization framework that provides a structured way to understand how the right to education is translated by JALA-PRT into actionable outcomes for domestic workers in Indonesia. This framework addresses the gap between rights on paper and their practical implementation by focusing on how laws and rights are enforced in daily life. Legal mobilization through vernacularization makes rights more accessible by adapting international standards to Indonesian law and local conditions as well as evaluating the achievement and limitations of the strategies. Third, the gender power relations perspective allows the research to critically observe whether these reforms substantively alter the power between employers and female domestic workers or if they preserve the status quo of gendered inequality. Together, these three frameworks are linked to the involvement of NGOs, where they act as actors that bridge the gap between international rules and local realities, framing the educational challenges faced by domestic workers strategically, navigating structural biases and seeing whether the involvement of female domestic workers in the strategy can challenge existing power dynamics.

2.1 Right to Education

The International Labor Conference of the International Labor Organization adopted the C189 in 2011. The Convention establishes fundamental rights and principles and imposes an obligation on states to take steps to realize it. One of the rights in the convention that needs to be prioritized is the right to education. Education is a development effort that can empower and improve the bargaining position of domestic workers (Kathirgamathamby, Selvaras and Manoj, 2023, p. 136). In addition, this provision is also intended to ensure the protection of child labor. Concerning access to education and training, Article 4(2) C189 stipulates that:

“Each Member shall take measures to ensure that work performed by domestic workers who are under the age of 18 and above the minimum age of employment does not deprive them of compulsory education, or interfere with opportunities to participate in further education or vocational training.”

In the provision, it is stated that compulsory education and continuing education apply to workers under the age of 18 and adult domestic workers. However, in this research, I am focused on adult education developed by JALA-PRT. The importance of education is discussed by Darkenward and Merriam (1982) who emphasize adult education that can make life easier by developing skills and ways to cope with changes and the various roles they will face, as well as more fulfilling for adults as they continue to develop and face new challenges.

“Adult education is concerned not with preparing people for life, but rather with helping people to live more successfully. Thus, if there is to be an overarching function of the adult education enterprise, it is to assist adults to increase competence, or negotiate transitions, in their social roles (worker, parent, retiree etc.), to help them gain greater fulfilment in their personal lives, and to assist them in solving personal and community problems’.” (Darkenwarld and Merriam, 1982, p.9),

In line with the convention, there is Recommendation 201 Concerning Decent Work for Domestic Workers (R201), which also serves as a complementary provision that must be considered together with the convention. In number 5(2)(a) of R201, provisions regarding the right to education are regulated which contain:

“When regulating the working and living conditions of domestic workers, Members should give special attention to the needs of domestic workers who are under the age of 18 and above the minimum age of employment as defined by national laws and regulations, and take measures to protect them, including by: (a) strictly limiting their hours of work to ensure adequate time for rest, education and training, leisure activities and family contacts.”

In addition, in number 25(1)(a) of the recommendation, there is also a provision for the state to encourage the development of domestic workers' competencies and qualifications sustainably in the form of policy and program determination. One of the things that is emphasized, for example, training on occupational safety and health requirements that are specific to housework (number 19d) and literacy training (number 25(1)(a)). About promoting access to education, the ILO (2012, p.90) states that restrictions on working hours also play a key role in ensuring the implementation of access to these rights.

Yet, C189 as a “meta norm” only provides a framework of reference and minimum standards regarding what and how the rights of domestic workers and all related matters should be regulated at the national level by each party state, while still providing room for flexibility for the relevant party state to make these regulations to suit the local context (Brugink and Sidharta, 1999, p.103 This flexibility permits each country to tailor specific regulations and policies to align with its local labor dynamics, economic conditions and social norms while still aiming to protect workers’ rights comprehensively. To help adapt, a translator is needed to help bridge the gap between the universal language of C189 and the local labor realities. For example, civil actors as translators help reshape international standards to meet local social, legal and cultural norms, ensure their acceptance and ensure that these rights address structural barriers and inequalities, such as gender bias. This process is called “vernacularization” (Merry, 2006a, p. 55) which is a form of legal mobilization that can help to fill the gap in implementing the right to education for domestic workers, which is discussed further in the next section.

2.2 Legal Mobilization

Translating human rights vocabulary into relevant local contexts can be carried out through legal mobilization by civil actors (Handmaker and Arts, 2019, pp. 2-3). Legal mobilization is a strategy to strengthen the rule of law to achieve political and/or social goals as well as to strengthen procedures and institutions against the arbitrary use of power and law (Handmaker and Taekema, 2023, p. 4). Furthermore, Handmaker (2019, p. 9) said that legal mobilization as an analytical lens explains how interaction with law can be combined with an approach based on legal pragmatism that sees the complexity of law as a means and end. Taekema in Handmaker (ibid.) further explains that, like legal mobilization, law is a theory

and a practice that is characterized by a commitment to certain legal ideals or values, although there are often gaps.

To strengthen the conceptualization of legal mobilization, Lehoucq and Taylor (2020, p.168) found an approach that supports the differentiation of analysis by linking it to legal framing and legal consciousness. These three approaches help analyze how civil actors navigate the intersection of formal legal structure and personal belief. Legal consciousness influences a person's perspective and actions toward rights and laws that are unconsciously internalized from their environment and social context to become personal beliefs (ibid. pp. 180-181). Then, this consciousness subtly influences the act of choosing and using law actively to advance claims through formal institutional mechanisms (legal mobilization) and interpret events. (legal framing) (ibid. p.181).

Moreover, Handmaker (2019, pp.11-15) highlights some elements of legal mobilization as analytical approaches to assess its legitimacy, also as political claims:

2.2.1 The Role of Civil Actors as Translators

Civil actors play an important role in translating international legal norms into local contexts by leveraging their legal capacity to challenge states (Handmaker, 2019, p.13). To obtain sufficient capacity, resource mobilization is also required, such as people, money and public support (ibid.). Besides, their capacity and critical role are also built from various professional experiences and cultural diversity to bridge inclusive communication and help understand the power dynamics in the transnational communication process of social movements (Tarrow in Doerr, 2021, pp. 155-156).

Merry (2006b, p.42) explains this role involves a dual awareness of the content of international law and the relevant local/national context. Two translation models can be noted: replication, where transnational norms are the basis while local context provides subtle adaptation; and hybridity, where global models interact more deeply with local contexts, resulting in 'hybrid institutions' (ibid., p.44-47).

Explaining local conditions, Merry and Levitt (2017, p.213) stated “local places are not empty, but rich with other understandings of rights, the state and justice.” Therefore, if there are new provisions to be implemented, including international human rights provisions, they need to be adjusted first to local conditions so that they can be accepted and implemented. Accordingly, human rights ideas such as these need to be translated into everyday language (vernacularization) and placed in the context of local power and meaning so that they can be implemented effectively (Merry, 2006a, p.55).

As an intermediary, the translator has a superior position in the form of power as a knowledge broker between distinct cultural environments, so that they can navigate or manipulate other people with lower knowledge (Merry, 2006b, p.40). In addition, they are also vulnerable to the dictates of international institutions or donors who determine their agendas and interests and resistance from local communities or vulnerable groups (ibid., pp.40-42). With one side in the realm of global discourse on human rights and the other side in the center of human suffering, translators have a double consciousness (ibid., p.42).

The power of law to shape society does not depend on punishment alone, but on its application in everyday social practice, thereby forming the rules that exist in someone's mind (Merry, 2006a, p.57). Moreover, Merry also explains the three dimensions of translation (ibid., pp.136-137): First, the images, symbols, and stories presented refer to certain local cultural narratives and conceptions known as framing. A frame is a way of packaging and presenting ideas that generate shared beliefs, motivate collective action, and determine appropriate action strategies. Second, adapting the program to suit the structural conditions in which the program is implemented. Each location has different government and private

services, law enforcement systems, and political institutions that influence how the prototype is translated. Third, as the program is translated, the target population is also redefined, making the scope different (*ibid.*).

From Merry's dimension, Goodale (2024a, pp.107-108) highlights the consequences of the process that human rights norms are fluid and therefore cannot be standardized in a fixed form. Human rights norms can change and develop based on negotiation, reformulation and resistance (*ibid.*). Goodale (2024b, p.21) further explains that Merry's observation of vernacularization is "processes through which normative meanings were creatively and collectively negotiated against a background of international intervention and legal soft power." Creative and collective negotiation means that civil actors are involved in a creative and dynamic process in which they adapt, modify and reinterpret international human rights norms to suit their cultural, social and political realities, thus constituting an active transformation. Hence, the process is also influenced by external pressures from international standards drawn up by international bodies that promote certain norms that shape local practices by introducing ideas and moral pressure that align with their values and objectives (*ibid.*; Handmaker, 2019, pp.13; Koskenniemi, 2009, pp.9-10). Intervention can come from donor interests or institutions that support financial, political and ethical interests (Goodale in Goodale and Merry, 2007, p.47). Another external pressure that also affects is the acceptance of the translator's interpretation from the relevant parties (Doerr, 2021, p.160).

Goodale and Doerr's opinion also adds other dimensions that need to be considered in the vernacularization process, namely power dynamics and external pressures, related to the next element in the form of structural bias.

2.2.2 Structural Bias

Vernacularization requires a good understanding of institutional structures and substantive law, which influence civil efforts to hold states accountable to international human rights norms (Handmaker, 2019, pp.11-15). Yet, as explained in the previous section, in this process it is undeniable that there is an external pressure that benefits the interests of certain elites, which is known as structural bias (*ibid.*). At the national level, it relates to the use of the legal system (especially litigation) to shape laws and secure the interests of certain groups (*ibid.*).

This definition is also in line with that conveyed by Koskenniemi (2009, p.9) who defines the structural bias in international law as the inequality and inherent power dynamics that shape legal discourse and practice. Koskenniemi criticized the indeterminacy of laws which are often claimed to be universal or neutral when in fact they are influenced by structural biases of international institutions (*ibid.*, pp.7-9). Structural bias reflects and reinforces existing power dynamics in international relations as powerful actors can shape the interpretation and application of international law to prioritize their interests (*ibid.*, p.10). Jurisdiction or expertise in different areas of international law creates their own biases leading to a "politics of re-definition" (*ibid.*, pp.9-12). Thus, understanding how problem definitions can influence the outcome of legal decisions and how certain expertise dominates legal discourse is important (*ibid.*).

As a result, this structural bias creates some consequences. First, it can legitimize existing power structures by presenting them as neutral legal outcomes (*ibid.*, p.9). Second, it will marginalize the less powerful actors (*ibid.*, pp.10-11). Third, it can lead to fragmentation of international law between different specialized areas (*ibid.*, pp.9-10). Fourth, depoliticization of issues (*ibid.*, p.12). Lastly, it can perpetuate inequalities by privileging the interests of powerful actors (*ibid.*, pp.10). Thus, by recognizing these biases, we can better understand the

limitations and potentials of international law in addressing global challenges and inequalities. To address structural biases, it is important to recognize and critically analyze the underlying assumptions, power dynamics and institutional preferences that shape legal outcomes (ibid., pp.9.12).

Koskenniemi also criticizes the institutional administrative practices of activists and experts involved in mainstreaming issues so that they do not stop until they successfully use their language (ibid., p.13). Civil actors must ensure that after their translation strategies are successfully recognized, changes are also needed in institutional outcomes, including clear directions for actions that support the sustainability of their implementation, such as inclusive policy-making patterns, the influence of certain expertise, how to frame and interpret the law, the selectivity of handling issues, and the cumulative impact of issue prioritization (pp.12-14). Therefore, the relations and perspective of marginalized groups are still needed to understand their specific needs and as a watchdog of their implementation (ibid., p.14) which is discussed further in the next section.

2.3 Gender Power Relations

Madhok examines how women in marginalized communities use their rights in contextual ways to confront structural bias and power in legal institutions. Madhok (2021, p.6) highlights “the political imaginaries, subjectivities, and gendered relations that contest and challenge oppressive practices and relations and importantly, generate new visions of justice.” She shows how the concept of gender justice emerged to influence the productivity of human rights and to create political struggles that challenged oppressive practices, thus creating new visions of justice. She highlights that the development of human rights is related to the productivity of rights themselves. (ibid.). Madhok (ibid., p. 25) argues that the concept of advancing rights from the margins is essential for challenging structural biases embedded within universal legal norms. By foregrounding marginalized participation, this approach not only reinterprets rights in ways that account for overlooked experiences but also expands the scope of entitlement languages to reflect diverse needs. Furthermore, it can lead to systemic transformation that benefits marginalized groups.

Women are one of the groups that are vulnerable to being negatively affected by the law. Otto (2006, p. 318) argues that the neutrality of international human rights law reproduces unequal gender power, although, on the other hand, it can also be an opportunity for change and contestation with "sexes its subjects". This means that the law often provides bias by placing men, women and other gender diversity as neutral, even though they have different needs and challenges. This framing also tends to prioritize the male perspective in defining and implementing rights that are often detrimental to gender minority groups by reinforcing existing hierarchies or systemic inequalities (ibid.). Otto (ibid., p. 320) also argues that international human rights law defines women in three ways: First, in their role as wives and mothers, they are guaranteed the right to protection in international law. Second, in their equal role with men in the public sector. Third, in their role as victims of violence, they also get protection. The role built through this contradiction further legitimizes the subjectivity of their gender role that men are the protectors of women, thus reinforcing the difference between men and women (ibid.).

Charlesworth and Chinkin (2000, p.10) add that women are often discriminated against by the national legal system, such as in terms of lack of participation and enjoyment of civil and political rights. They further argue:

“The absence of women in development of international law has produced a narrow and inadequate jurisprudence that has legitimated the unequal position of women than challenged it.” (Charlesworth and Chinkin, 2000, p.1)

They added that the significant causes of the gap in access to resources for men and women are due to de facto segregation, low views on women's work, their lack of bargaining power through lack of involvement in trade union action, cultural and social norms, and limited women's access to education and literacy skills (ibid., pp.6-8). This restricted access among women hinders their development, further reinforcing a cycle where existing legal and social frameworks favor male-dominated spheres. Such biases sustain unequal power dynamics. Thus, it requires strategies that enable women to negotiate and advocate effectively for equal rights and fair treatment to empower them.

One way for them to be empowered is to participate in civil society. They can represent themselves individually or in an organization in the collective participation space. On the one hand, Eto (2012, p. 103) argues civil society is an alternative for women, who are often excluded from legislative bodies, to participate in influencing political decision-making. On the other hand, it does not necessarily empower them (ibid.). Eto's (ibid. p. 105) opinion is also reinforced by the assumption of most civil society theorists regarding their gender-neutral or universal approach to preventing gender discrimination. This paradigm is often dominated by men in its definition and regulation, which can result in a lack of representation that truly reflects women's perspectives and needs in civil society and perpetuates structural bias (ibid.). Therefore, analyzing the extent of women's involvement in civil society is also important to evaluate how it affects the transformation of power dynamics.

Chapter 3

Methodology and Methods

This chapter explains the procedures for data collection, data processing, knowledge production, positionality and ethical considerations in this research.

This research uses qualitative methods to gather data and generate research findings. It collaborates primary data and secondary data to enrich the analysis and justification. Primary data collection was conducted through in-depth interviews. The data collection process was carried out from July to September 2024. As the research wants to evaluate the legal mobilization efforts carried out by JALA-PRT in mobilizing the right to education for domestic workers in Indonesia, I conducted interviews with JALA-PRT and the parties who support and receive the benefits of their efforts. In addition, I also inserted the data that I gathered from Lita Anggraini as the Coordinator of JALA-PRT when I attended the Gender at Work in Development class which was held in February 2024.

I interviewed each representative of the ILO Jakarta as a donor agency, a local NGO that connects JALA-PRT to local domestic workers and the Domestic Workers Union (SPRT) as the beneficiaries of this strategy are domestic workers themselves (see Appendix 1). The five participants are enough to provide a balanced representation of the primary stakeholders involved in JALA-PRT initiatives. I also considered their positions in the organizational structure to represent each of these organizations, so that this study provides comprehensive perspectives. Each participant's position allows for insights into the dynamics of collaboration, resource mobilization and on-the-ground implementation, which are essential for understanding JALA-PRT's approach.

In this research, I examined the extent of JALA-PRT's influence in mobilizing the right to education for female domestic workers. Summerville et al. (2021, p.466) state that good qualitative research must understand existing intersections, give voice to marginalized groups, and offer opportunities for others to learn. I realize that this research must highlight intersectionality to understand the power dynamics that exist between gender, domestic workers, low-educated and low-income people, and social construction in society that marginalized them. The special conditions of domestic workers also need to be understood to analyze problems, such as local cultural, social, and political situations that influence the vulnerability and discrimination they experience. Simply depicting domestic workers as vulnerable and powerless is a problem because it makes them appear helpless and have no control over their own lives (Moosa and Tuana, 2014, p. 683). So, in this research, I also explore how their power relations transformed after the JALA-PRT intervention.

To get informant contacts, I utilized the informal network I gained while working at a national human rights institution in Indonesia and used these stakeholders as my informants (Hennink, Hutter, and Bailey, 2020, p. 145). I also used the snowball method to get the domestic worker's contact. When contacting them, I also had difficulties because of the time difference between Indonesia and the Netherlands and the busyness of each participant, so the reply was quite long until we finally agreed on a suitable time to conduct an online interview. In addition, I also have a follow-up conversation for additional questions, clarifications and confirmations. The participants were open and welcomed the research I conducted after I explained it to them. They answered the questions I asked enthusiastically. The questions conveyed include limited personal information (name and position in the organization),

organization details, challenges or biases and how they overcome them, vernacularization process of C189 including its strategies, impact and limitations.

Besides, secondary data are collected from related literature, such as national and international human rights instruments, national media, social media, organizations reports (including international organizations), data from other researchers and national regulations or policies related to Human Rights, Manpower and Domestic Workers.

Because several primary and secondary data sources use Indonesian, data analysis was conducted through interpretation and translation into English. In this regard, it is important to be aware of translation deficiencies, namely differences in the meaning of words in Indonesian and English. Therefore, I tried my best to translate it in a context that is closest to its original meaning so that it reflects the informant's views. Meanwhile, data interpretation was produced by listening again to interview recordings, re-reading field notes, and thematic grouping. Then, I connected relevant concepts to explain the findings and analyzed them.

In this study, I was also careful because the informants chose to use their real names as they wanted to validate their experience and indeed there were no questions that harmed them. Therefore, I make sure that they understand the implications of this openness and try to convey their ideas as closely as possible to the original. In this research process, I involved the active participation of informants by informing them of research plans, data needs, data use, research limitations, research follow-up, as well as informants' rights.

As a student and researcher who does have affiliation with national human rights institutions, I consider myself an insider and I am aware of the privilege I have in accessing data and interpreting results. The relationship between my identity and the research participants also affects partiality. To fellow women, the academic community, workers in the field of human rights and to be seen on their side for initiating this research, my relationship with the participants became more open and equal. This consideration is in line with "positional reflexivity" as referred to by Lichterman (2017, pp. 36-37). Nevertheless, from the interview participant side, I also realize that each participant has their own bias, for example from affiliation, personal views, interest in issues and organizations. Therefore, the data obtained still has the possibility of not truly representing the actual situation as a whole.

I am also aware of my position as an outsider when I did not directly experience and/or associate with my informant. I am aware of bias in the knowledge production process, especially in translating and interpreting information. I realize that there may be information that has been excluded because I consider the information not important or not in line with my research focus and the frameworks.

To maintain credibility, I prioritize the informant's voice as the main idea in data interpretation. I also remain respectful of their agency and am aware of the control over how much information they can convey. In line with the concept of "situated knowledge" conveyed by Harraway (1998, p. 592) which reminds us that all knowledge is contextual, grounded in specific power relations and social positions. Therefore, I keep the representation in this study from endangering the participants and the surrounding environment while still paying attention to the participant's safety and reputation.

Chapter 4

Framing the Problem

This section explains how JALA-PRT defines the problems for domestic workers in Indonesia to be used as the basis for a policy agenda. I argue that JALA-PRT uses the hybridity framing method in vernacularization by involving the translation of the right to education according to C189 into the local context by considering the specific social, economic and cultural conditions of Indonesia. JALA-PRT's framing focuses on skills development programs that directly affect domestic workers' ability to improve themselves and their working conditions. They used three approaches based on the challenges they identified in the field, namely reframing the general perspective that domestic workers are workers, reframing the public and government perspective, and reframing the domestic workers perspective.

In the process of vernacularization, JALA-PRT faces resistance from the government and community who do not fully understand or accept the educational rights of domestic workers. This is described by Merry and Levitt (2017, p.213) as local conditions that already have their assumptions about the condition of domestic workers and their needs. One of my research participants, Ujianto from JALA-PRT (Interview n.1, 31 July 2024, online) stated that shared challenges for domestic workers in Indonesia are related to legal, economic, cultural barriers and social views that consider them inferior, so it does not require education. Ujianto explained that domestic workers, dominated by women from the lower class and with low education, are only considered helpers, so they are excluded from the Manpower Law (ibid.). Ujianto added that Indonesian people, still consider that domestic work does not require special skills, so it does not require education or training (ibid.).

Rahayu, a representative from the domestic workers union (SPRT) that I interviewed, added the challenges she faces are limited time, permission from employers and family, opportunities, fear of being fired, costs, distance, and awareness of domestic workers themselves (Interview n.3, 12 August 2024, online). Time constraints are especially experienced by domestic workers who work live-in, especially since employers often do not allow them to leave the house or take leave (ibid.). Another dynamic is the variety of employers' thinking towards training. Rahayu (ibid.) mentioned, "*Employers also have diverse backgrounds, some consider (education) important and others not.*" In addition, Rahayu shared that even at SPRT, they must take turns between members based on the voting system to get training opportunities (ibid.). Indonesian domestic workers' awareness of the urgency and long-term impact of education is also low, so they feel more afraid of being fired and more consider the risk of cost and distance which is considered detrimental and not their priority (ibid.). The resistance of domestic workers as vulnerable groups and local communities as referred to by Merry (2006b, pp.40-42) is also external pressure so it needs to be navigated by JALA-PRT as a knowledge broker (ibid., p.40). This resistance challenges JALA-PRT's efforts to navigate people with lower knowledge (ibid.) by highlighting the need for education initiatives that align more closely with domestic workers' lived experiences and priorities.

JALA-PRT navigates by framing problems as intended by Merry (2006a, p.136) to change these perceptions so it can be more accepted by the domestic workers and Indonesian people. With its dual consciousness (Merry, 2006b, p.42), JALA PRT makes C189 as a general guideline and then adjusts it to Indonesia's social, economic and cultural conditions. My informant from ILO Jakarta, Ratnawati (Interview n.2, 2 August 2024, online) said JALA-PRT also informed ILO that not all provisions in C189 can be applied, so they adjust them to which provisions should be prioritized and may be implemented. One of them is the right to education. Although Merry (2006b, pp.40-42) argues that there is a possibility that civil

actors can be driven by the interests of donors or international institutions, Ratnawati stated that even before ILO Jakarta provided resource assistance through the PROMOTE program, JALA-PRT had already implemented its strategy (Interview n.2, 2 August 2024, online). ILO Jakarta only provided resources from 2013 to 2017 in the form of funding, expert assistance to help improve skills and prepare training curricula, and encourage policy advocacy to the Indonesian government (ibid.).

My research participant from JALA-PRT, Ujianto (Interview n.1, 31 July 2024, online) described the first approach that JALA-PRT used is framing domestic workers as workers, so that they potentially have the same rights as other workers, including educational rights. JALA-PRT also highlights that more and more women play the role of the backbone of the family, so they also have the right to receive education and training to streamline their work and improve their lives (ibid.). Second, JALA-PRT also assures the community and the government that domestic workers need to develop their abilities to be able to work well. For example, they need training in using electronic devices and cooking to meet the demands of employers and complete their work (ibid.). This understanding is more acceptable to the parties because there is less resistance.

Third, JALA-PRT specifically addresses the resistance from domestic workers by convincing them of the importance of education and training by emphasizing how these activities can directly upgrade their skills, self-agency and job security (ibid.). JALA-PRT uses an approach that helps to identify domestic workers' personal experiences and problems, so that they can feel connected and willing to participate in training (ibid.). JALA-PRT reframes education as an empowerment tool as mentioned by Kathirgamathamby, Selvaras and Manoj (2023, p.136), showing education that they initiated is not the formal one but about learning specific skills that improve their capabilities within the domestic work sector, such as right awareness, caregiving, and culinary skills (Interview n.1, 31 July 2024, online). These skills provide practical benefits as described by Darkenwarld and Merriam (1982, p.9), such as better negotiating power with employers. This understanding tries to break down the social and cultural construction that domestic workers do not need certain abilities and challenge the assumption that they are incapable of nothing by making them have various abilities. Furthermore, JALA-PRT addresses cultural and economic barriers that may prevent workers from prioritizing education by offering flexible programs and emphasizing how knowledge can also contribute to personal security within precarious work environments, such as labor rights. Then, to overcome economic challenges, Ujianto (Interview n.1, 31 July 2024, online) also said that to facilitate costs and distance burdens, they collaborate with the local domestic worker community to share knowledge more closely, hybrid learning to assist easier access from everywhere or tackle permission issues and working with donors to fund training. It also reflects a creative and dynamic process of vernacularization as Goodale (2024b, p. 21) addressed by aligning educational initiatives with workers' immediate context, making it clear that these skills can lead to tangible improvements in their work conditions and social status.

In this context, JALA-PRT uses a hybridity approach as referred to by Merry (2006, pp.44-47). Ujianto (Interview n.1, 31 July 2024, online) mentioned that JALA-PRT involves combining the principles of education in C189 with the specific needs of domestic workers in Indonesia. He added that although C189 only mentions general training, but JALA-PRT interprets it by holding relevant training that can improve the ability of domestic workers, such as to use cooking equipment and literacy (ibid.). In this way, JALA-PRT not only superficially replicates international norms, but also adapts their meaning to broader local needs, which include social, economic and cultural inequalities.

Chapter 5

Evaluating JALA-PRT's Vernacularization Strategies

This chapter examines the strategies that JALA-PRT employs to vernacularize the right to education critically, assessing the impact and limitations of each strategy. I argue that JALA-PRT uses four strategies: (1) organizing and unionizing, (2) domestic workers school and various training, (3) developing a network and (4) policy advocacy. Impacts are measured on workers' skill sets and shifts in public attitudes. Limitations arise from structural and resource constraints, public resistance and legal gaps. This chapter also describes the second and third dimensions of Merry in vernacularization, namely adapting the program that specifically addresses local needs and redefining the target population (Merry, 2006a, p.57).

JALA-PRT as a translator of the right to education for domestic workers must navigate between their understanding of universal rights and limitations in the local realities faced by domestic workers (Merry, 2006b, p.42). JALA-PRT defines the right to education as a tool to improve the working conditions and bargaining position of domestic workers in Indonesia, following the standards applied in C189. As Ujianto (Interview n.1, 31 July 2024, online) said, *“For domestic workers who have more skills such as being able to cook various international dishes, have training certifications and can speak English, then often their salaries are higher and they are more likely to be recruited by expats. They have more bargaining power than their friends who do not have these skills and there is also the possibility of being able to negotiate further with employers.”*

As stated by Merry (2006a, p.57), the power of law to shape society depends on how the law is applied in social practice. In this context, JALA-PRT not only advocates for the right to education, but also seeks to establish social practices that support the implementation of these rights. The realization of this argument is supported by the Ujianto's (ibid.) statement, *“This includes building support networks and raising awareness among domestic workers and the wider community about the importance of education for domestic workers. We continue to expand our national and international networks, and intensify campaigns both online and offline in Indonesia so that more people are aware of education and training for domestic workers.”* JALA-PRT has mobilized several individuals to NGOs to help with their activities. For example, the 42 organizations that are members of its network, the trade unions that continue to recruit and build the capacity of their members, the ILO Jakarta which supports the capacity building and funding of JALA-PRT activities, the domestic workers who are aware and fight for their rights with JALA-PRT and the community who participate in the campaign and support JALA-PRT policy advocacy. In addition, JALA-PRT has also proposed arrangements regarding education and training for domestic workers in the Domestic Workers Protection Bill.

More completely, I divide the evaluation into the following four types of strategies below, from organizing and unionizing to policy advocacy:

5.1 Organizing and Unionizing

Through organizing and unionizing, JALA-PRT seeks to recruit members and organize domestic workers through the Domestic Workers Union (SPRT) as a force. Lita Anggaraini (2024) said that through unionization, JALA-PRT seeks to build and develop power, access and collective bargaining to overcome difficulties and challenges as Handmaker and Taekema (2023, p.4) stated to fight against arbitrary laws and power. Ujianto (Interview n.1, 31 July 2024, online) also added the urgency of this organization so that domestic workers themselves must be the backbone of advocacy.

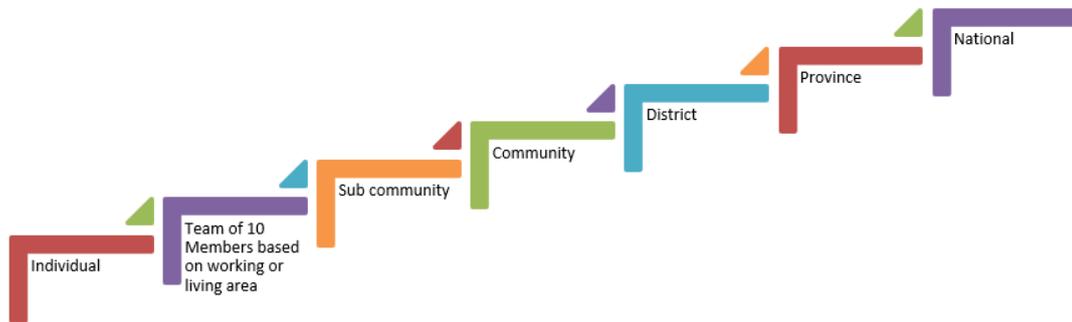
Anggraini (2024) said that this organization is the first step to facilitating the reach of the Domestic Workers School and other training needed by domestic workers. This is also part of creating the conditions referred to in Article 4(2) C189 to facilitate access to education for domestic workers. Additionally, after participating in the training, community leaders and members from SPRT can recruit members and invite them to participate in the Domestic Workers School (ibid.). JALA-PRT has helped the formation of 8 Domestic Workers Unions in 7 cities in Indonesia: SPRT Sapulidi DKI Jakarta, SPRT South Tangerang, SPRT Bandar Lampung, SPRT North Sumatra, SPRT Parakatte Makassar, SPRT Merdeka Semarang, SPRT Tunas Mulia Yogyakarta, and KOY SPRT Yogyakarta (ibid.).

Recruiting members is carried out using the Rapid Assessment Process (RAP) method, which according to JALA-PRT is an effective way to overcome existing challenges (Anggraini, 2024). RAP is a method that JALA-PRT adopted from international organizations, such as UNICEF and WHO, to recruit domestic workers to become members of organizations adapted from qualitative research methodologies to understand the needs and perspectives of the community (ibid.) RAP tries to redefine domestic workers' rights by adjusting the narrative they use to the condition of each domestic worker so that they feel connected and can receive explanations more easily as Merry (2006a, p.57) also touches on adapting the program to specifically address local needs and redefining target populations. RAP is a participatory, systematic and dynamic method, allowing Rappers and RAP targets to understand the problems they face and how they should be solved.

The six steps of RAP include an introduction, issue raising, awareness raising, vision, asking and follow-up. First, Rappers (community leaders or members) reach out to targeted domestic workers by introducing the community system and SPRT. Second, the Rapper builds discussions with targeted domestic workers and explores the situations and problems faced by the target as well as what they need and hope to solve the problem. The rapper will then do problem mapping and analyze the problem. Third, the Rapper then met the target again to discuss the problem accompanied by their analysis which is linked to structural and cultural factors and is linked to existing systems and policies and solutions. Rappers began to build awareness by explaining the standard decent working conditions so that domestic workers could learn how to overcome their problems by joining the organization. Fourth, the Rapper then discussed further about the medium and long-term steps to make social changes to the difficulties experienced by domestic workers with collective protection in the organization. Fifth, the Rapper then invited domestic workers to join the organization and participate in various activities, such as the Domestic Workers School and member meetings. The rapper also asked the domestic workers to invite other of his friends to join. If the target is still thinking or refusing, then the Rapper will evaluate the method and repeat Steps 3 to 6. Finally, the Rapper invited domestic workers who have joined to participate in various activities and help respond to the problems faced by him and other members to common problems to then prepare action plans in the short, medium and long term to advocate for these problems.

This method aims to foster critical awareness of domestic workers, so they decide to engage in joint action in an organization (IDWF & ILO in Ujianto, 2019, p. 119). In this community, they share each other's roles, resources (money in the form of membership fees and solidarity fund, knowledge, experiences, ideas, place, food, energy, space and time), co-ordination, power and solidarity. This organization moves members as a power of movement by encouraging individual strength to the national level as referred to in Figure 1. The more individuals who join to form a community, the greater the forces at the next level to the national level.

Figure 1. Organizational Structure as Power of Movement



Source: Anggraini, 2024, processed by author.

One of the results of organizing and unionizing is to build and increase pressure groups to advocate for decent working conditions and the use of social media to conduct campaigns simultaneously, such as through WhatsApp, Facebook, Instagram and X (formerly Twitter). The more SPRT members who join and are moved to carry out campaigns, the greater the spread as it expands the accessible condition as mentioned in Article 4(2) C189 as domestic workers' participation increases. They can also channel their aspirations and encourage the guarantee and implementation of their rights to achieve decent working conditions. Until now, these members have also actively enlivened JALA-PRT's social media regarding posts about encouraging people to realize their rights and actively participated in face-to-face participation in advocacy activities.

Figure 2. Example of Policy Advocacy Posts on Social Media of JALA-PRT Members



Source: Anggraini, 2024.

However, there are also limitations to JALA-PRT's intervention from this strategy due to limited people to carry out recruitment, the absence of immediately visible benefits so that it is less convincing for some domestic workers who refuse, and the network is still not evenly distributed nationally (Interview n.1, 31 July 2024, online; Interview n.4, 25 September 2024, online).

5.2 Domestic Workers School and Various Training

JALA-PRT adopts the provisions of article 4(2) C189 regarding "opportunities to participate in further education or vocational training." Referring to vernacularization as referred to by Merry (2006a, pp.55-57), JALA-PRT adopts this general rule through the Domestic Workers School (DW school) program and various training in the adaptation process according to the specific needs of domestic workers. The material presented is adjusted to the needs of domestic workers who are recruited from their aspirations through SPRT or when the learning process takes place (Interview n.1, 31 July 2024, online; Interview n.3, 12 August 2024, online).

Anggraini (2024) explained that JALA-PRT established DW school to build and expand domestic works and SPRT, especially leaders', capacity to be transferred to their members. Domestic workers get a serial capacity building program more intensive. She also explained that they compiled some training manuals for the training program:

- a. Orientation: basic orientation social analysis skills regarding domestic workers' issues such as human rights, women, labor, children and citizens.
- b. Organizing: for beginners, organizers and advanced.
- c. Advocacy: case handling, labor law, journalism, campaign, negotiation and decent working condition standard, training of trainers and series of human rights.
- d. Unionizing: building trade unions, tripartite mechanism, fundraising and economic management, conflict management and program planning to evaluation.

Ujianto (Interview n.1, 31 July 2024, online) then further explained that this training is also carried out based on the level of ability of domestic workers: basic for beginners, intermediate for follow-up training and advanced for improving the ability of trainers and community leaders.

Rahayu (Interview n.3, 12 August 2024, online), who comes from SPRT Sapulidi, also explained this program's impacts. From these various trainings, Rahayu (ibid.) mentioned that participants also get certificates that can be useful not only as a sign that they have participated in the training but also as a basis for validation to employers that domestic workers have certain abilities. Rahayu even got the opportunity to continue her studies from JALA-PRT because she is an active union administrator, although few have gotten this opportunity because of the large cost. Rahayu also said that she and her friends who have participated in education and training from JALA-PRT have become more confident, gaining various knowledge and opportunities, such as access to formal and advanced education, training abroad, friends and networks, and being listened to for their aspirations. She also got the opportunity to study politics and become a legislative candidate representing the Labor Party with the support of JALA-PRT (ibid.). By nominating domestic workers as legislative candidates, JALA-PRT also aims for domestic workers to participate directly in the policy-making process and include their perspectives.

Rahayu (ibid.) and Ratnawati (Interview.n.2, 2 August 2024, online) also said that training can provide domestic workers with knowledge and bargaining power related to standards for wages and appropriate work conditions, in addition to increasing their skills. Ratnawati (ibid.) also appreciated the high initiative owned by JALA-PRT in answering the various needs of domestic workers through its legal mobilization efforts. JALA-PRT is very helpful to ILO Jakarta in conveying the aspirations and needs of Indonesian domestic workers to help ILO determine appropriate programs and curricula for them (ibid.). JALA-PRT also have an extensive coalition network. Even before being assisted by ILO Jakarta, JALA-PRT had carried out many initiatives and continuous activism (ibid.).

Then, Anggraini (2024) further stated that to adjust to the time constraints possessed by domestic workers, JALA-PRT carries out school activities on weekends with several time

slots. When the Coronavirus Disease 2019 (Covid-19) pandemic took place, they also adjusted with physical distancing restrictions with online methods. The school is held twice a month through WhatsApp Group, YouTube and ZOOM. Meanwhile, if intensive training is needed, it is carried out non-stop for 3-4 days of training. In addition, as part of the post-training after participating in the DW school, the participants then transfer knowledge through alternative education in the community whose schedule is adjusted by each community. This method is also applied to face economic and social problems to make it more accessible for domestic workers. The training was held for free because the training cost came from member dues and financing from donors.

Anggraini's explanation is also supported by Rahayu's answer. She confirmed that there is a hybrid training, making it easier to access (Interview n.3, 12 August 2024, online) (see Figures 3 and 4). The involvement of SPRT and smaller communities is also very useful in helping to distribute information and knowledge gained from DW school to other domestic workers who were unable to participate previously (ibid.).

There are also limitations in the form of the continuity of schools and training due to the lack of experts in certain training needs and minimal costs if the training requires large costs (Interview n.4, 25 September 2024, online). Therefore, JALA-PRT overcomes this by collaborating with various parties and actively receiving proposals for training needs from the Domestic Workers Union. Ujianto (Interview n.1, 31 July 2024, online) mentioned that through collaboration with ILO Jakarta, learning modules are assisted in the preparation by experts and expensive training can be financed by them under ILO's PROMOTE program. These are forms of resource mobilization as referred to by Handmaker (2019, pp.13).

Figure 3. Domestic Workers School Offline Activities



Source: Anggraini, 2024.

Figure 4. Domestic Workers School Online Activities



Source: Anggraini, 2024.

Figure 5. Results of Journalism and Social Media Training in the form of Campaign on Social Media by SPRT



Source: Anggraini, 2024.

Figure 6. Preparation of Social Media Campaign Posting Schedule to Support Its Sustainability

| Time/ Waktu | Link Posting, Topic/Theme and Domestic Workers Union Time/Waktu: 4 – 10 April 2022 Theme/Tema: Social Protection for Domestic Workers Team/Tim SPRT/Operata: SPRT Sapulidi |
|----------------|--|
| 4/4/22 | https://m.facebook.com/story.php?story_fbid=3162298300693395&id=10000739767 https://www.instagram.com/p/Cb6uUOIpliy/?utm_medium=share_sheet |
| 5/4/22 | https://m.facebook.com/story.php?story_fbid=1064874414062115&id=10001618699 https://www.instagram.com/p/Cb9XB18JNt5/?utm_medium=share_sheet |
| 6/4/22 | https://m.facebook.com/story.php?story_fbid=1725308107813052&id=10001001638 https://www.instagram.com/p/Cb_bpRhJATB/?utm_medium=share_sheet |
| 7/4/22 | https://m.facebook.com/story.php?story_fbid=1433059440484349&id=10001340919 |
| 8/4/22 | https://m.facebook.com/story.php?story_fbid=1204185900351598&id=10002280599 fnsn=wiwspwa |
| 9/4/22 | https://m.facebook.com/story.php?story_fbid=5081236415270465&id=10000152469 fnsn=wiwspwa https://www.instagram.com/p/CcHdCMPLUDY/?igshid=MDJmNzVkmjY= |
| 10/4/22 | https://m.facebook.com/story.php?story_fbid=1372296719922559&id=10001426731 |

Source: Anggraini, 2024.

Furthermore, regarding figures 5 and 6, Rahayu (Interview n.3, 12 August 2024, online) explained that the activity greatly involved the participation of domestic workers. She said that each person in charge of each SPRT was given the freedom to enliven the campaign on social media according to their preferences and issues that they considered important. They were also trained to make decisions and develop their understanding (ibid.). This is also a form of vocational training as referred to in Article 4(2) C189 in improving communication management skills.

5.3 Developing a Network

To increase strength and resources, JALA-PRT also develops networks nationally and internationally (Ujianto, Interview n.1, 31 July 2024, online). This network expansion is also an interpretation of the general provisions of C189, which states that states parties must consult with other parties in implementing the convention. Such consultations can also be done through networking with various organizations at the local and international levels. On a

national scale, JALA-PRT collaborates with several organizations, for example in terms of training in resolving domestic worker cases with the Gema Perempuan Group, Legal Aid Institutions (LBH APIK and LBH Jakarta) and Mitra ImaDei. The JALA-PRT network continues to expand but is dominated by women's organizations, NGOs, and domestic workers' organizations from 16 cities in Indonesia: Medan, Batam, Yogyakarta, Jakarta and Banten Province, Bandung, Semarang, Solo, Surabaya, Madura, Mataram, Flores, and Kupang, Pontianak, Samarinda, Makassar, Denpasar (Dewanti, 2019, p.15). Sri in Dewanti (ibid., pp.15-16) noted that between 2009 and 2012, JALA-PRT also built a network to ratify C189 and to demand national laws to protect domestic workers as follow:

1. 2009: joined the network of migrant workers and child workers, consisting of Migrant Care, Indonesian Migrant Workers Union, Child Labor Elimination Network, and Indonesian Workers Association. The focus was to form a network to promote domestic work as decent work. This network is called Jakerla PRT.
2. 2010: formed the Domestic Workers Action Committee Network (KAPRT) together with three trade union confederations. The focus of this network is once again to push for the ratification of C189, the formation of a law on the protection of domestic workers, and the revision of the Law on the Placement and Protection of Overseas Migrant Workers.
3. 2012: joined with Coalition for action - Protection of Domestic and Migrant Workers Action Committee (KAPPRTBM). The network aims to lobby the National Tripartite, a joint body of labor, employer and government representatives, to push for the ratification of C189, the 1990 UN Convention on the Protection of the Rights of All Migrant Workers and Members of their Families. The network also supports JALA-PRT in advocating for the country to enact laws to protect domestic workers.

However, it can be seen from the data that there are limitations in that some movements or networks cannot be continued and are only carried out once due to the selectivity of the issues and the lack of resources in the form of people, money and support from other parties needed to support the movement (Interview n.4, 25 September 2024, online).

Internationally, JALA-PRT expanded its advocacy by co-initiating the Asian Domestic Workers Network in 2005, which then organized an international meeting of domestic workers in Amsterdam to start a global movement and push for the ratification of the ILO Convention on the Protection of Domestic Workers (International Domestic Workers Federation, 2023). Then, in 2009, JALA-PRT also initiated and joined as a member of the International Domestic Workers Network, which has now changed its name to the International Domestic Workers Federation (IDWF) (ibid.) Through international networks, Ujianto explained JALA-PRT can expand the reach of the campaign internationally, obtain funding from international donors to bridge cooperation with domestic workers' unions and capacity building (Interview n.1, 31 July 2024, online). IDWF even helps fight for JALA-PRT's demands to the Indonesian government by continuing to monitor the situation and sending open letters and press releases. (Dewanti, 2019, pp.72-74).

5.4 Policy Advocacy

JALA-PRT defines the problems for female domestic workers in Indonesia to become a policy agenda. In 2004, JALA-PRT submitted the initiative to prepare the Domestic Workers Protection Bill (RUU PPRT) to the House of Representatives (DPR). This bill is the main priority of the JALA-PRT strategy as mentioned by Ujianto (Interview n.1, 31 July 2024, online).

Ujianto (ibid.) continued that JALA-PRT encourages education policies in the RUU PPRRT adapting from Article 4(2) C189 which includes:

- a. Implementation and supervision: The main obligation of implementation and supervision is still carried out by the state (central government), but there is a proposal that local governments, domestic worker distribution institutions, SPRT and/or the community can also organize it.
- b. The obligation for domestic worker distributors to ensure the inclusion of prospective domestic workers and domestic workers in education and training organized by other parties.
- c. Important materials for prospective domestic workers and domestic workers: knowledge about employment relations, training to improve job skills and expertise, education about social and cultural norms that live in society according to the context of the workplace, education about the rights of domestic workers, information about occupational safety and health, and information about discrimination and violence. The government must provide a budget and vocational training centers.
- d. Further arrangements regarding education and training for domestic workers in the recommended Ministerial Regulation contain the curriculum, implementation period, certification and renewal, financing (without wage deduction), implementation time, etc.

Ujianto (ibid.) added that JALA-PRT together with volunteers also held a demonstration to increase pressure on the DPR. By pressuring legislators and harnessing the power of grassroots networks, JALA-PRT seeks to ensure the legal recognition of domestic workers' rights and their implementation effectively and inclusively. JALA-PRT's idea of promoting the right to education is in line with Koskenniemi's (2024) and Madhok's (2021) critique of structural bias in international legal institutions. JALA-PRT is trying to make the law no longer only benefit those who have more power economically and politically as conveyed by Koskenniemi (2024, p.65-68) and emphasizes the role of women and domestic workers involved in the organization who together fight for their rights to challenge this structural bias (Madhok, 2021, p.6). This effort shows the struggle for gender justice which is seen as a process of changing the dynamics of power in legal institutions, while at the same time creating justice for female domestic workers through the productivity of human rights in more inclusive national laws. Through JALA-PRT, female domestic workers can also have the opportunity to voice their rights.

One of the impacts of advocacy conveyed by JALA-PRT is the attention of international institutions to domestic workers in Indonesia.

“Currently, there is some funding for us. For example, from ILO Jakarta and IDWF for training on creating a federation or Domestic Workers Union. Then there is also a campaign about care work. Care work is also an important issue because it was discussed at the International Labor Conference last June and is the main theme of the discussion. Care workers are one of the main backbones of the economy, including domestic workers. Even the Ministry of Women's Empowerment and Child Protection already has that roadmap. Regarding economic care, he has seven priorities if I'm not mistaken. One of them must be related to the appreciation for the care work profession.” (Interview n.1, 31 July 2024, online)

Ujianto also added that from the evaluation carried out by JALA-PRT, there has begun to be recognition from the government, both national and regional, as well as the public. One of the results of JALA-PRT's efforts to provide recognition for domestic workers is the success of becoming a member of Social Security through lobbying carried out by JALA-PRT with Social Insurance Administration Organization (BPJS). Consequently, domestic workers also have their own rates which are cheaper than the public rates (ibid.).

In addition, Ujianto (2024) conveyed several significant changes in policy discussions, legal framework, and public opinion. For example, there has been attention and recognition of domestic workers by Yogyakarta's Local People's Representative Council (Dewan Perwakilan Rakyat Daerah/DPRD). The aspirations of domestic workers began to be heard in meetings, they could participate in meetings and discuss labor regulations at the regional level. However, although several regions already have rules related to the protection of domestic workers, education and training have not been mentioned in their substitutions, for instance, DKI Jakarta Provincial Regulation No. 6 of 2015 and Surabaya City Regional Regulation No. 3 of 2016. Only one regulation, Yogyakarta Provincial Regulation No. 31 of 2010 concerning Domestic Workers, contains provisions for skills education. However, it does not contain an obligation to implement it, but only an appeal.

Chapter 6

Addressing Structural Bias

In this chapter, I examine what structural biases exist in the local Indonesian context and how JALA-PRT addresses them. I argue that it relates to the representation of powerful actor, the involvement of female domestic workers in transforming power dynamics, the abandonment of the Indonesian government and society and neutrality of C189. I also highlight solutions to empower domestic workers by maximizing domestic workers' participation and independence

6.1 Representation of JALA-PRT as a Powerful Actor

The representation of powerful actors is one of the structural biases that I identified as referred to by Handmaker (2019, pp.11-15). This argument is also related to the idea of Koskenniemi (2009, p.10) regarding their power to shape the translation and implementation of C189 in accommodating its target population. In Indonesia, there are several actors involved in legal mobilization efforts with different roles as listed in Table 1. However, when compared with these actors, considering the operating time, specific interests, and organizational level, JALA-PRT is the most powerful actor among them all because it is a national-level network whose members are domestic worker unions, individual domestic workers, individual activists or academics, women's organizations, civil society organizations and feminist organizations. JALA-PRT can communicate and coordinate with grassroots organizations to the government, even international organizations.

Table 1.
Organizations Involved in Legal Mobilization for Domestic Workers' Rights

| No | Organization Name | Role/Goal | Notes |
|----|-------------------|--|---|
| 1 | Jakerla PRT | Formed a network to promote domestic work as decent work. | Only existed in 2009 |
| 2 | JALA-PRT | Advocating for the rights of domestic workers through the Domestic Workers Protection Bill (RUU PPRT); organizing and educating domestic workers; and conducting a public campaign regarding the decent work situation and the rights of domestic workers. | Interest: Domestic workers' rights Level: National |
| 3 | JARAK | The main goal of this network is to eliminate child labor. | Interest: Eliminate child labor. Level: National |
| 4 | KAPRT | Formed a network to advocate for the ratification of C189, the formation of a law on the protection of domestic workers, and the revision of the Law on the Placement and Protection of Overseas Migrant Workers. | Only existed in 2010 |

| | | | |
|----|---|--|---|
| 5 | KAPPRTBM | The network aims to lobby the National Tripartite; to push for the ratification of C189, the 1990 UN Convention on the Protection of the Rights of All Migrant Workers and Members of their Families. The network also supports JALA-PRT in advocating for the country to enact laws to protect domestic workers | Only existed in 2012 |
| 6 | LBH APIK | To create a just and democratic society, as well as create equal conditions between women and men in all aspects of life, whether political, economic, social or cultural. | Interest: Legal service and assistance Level: National |
| 7 | National Commission on Human Rights | One of Indonesia's National Human Rights Institutions that pushes for the fulfillment and advancement of human rights. | Interest: General human rights Level: National |
| 8 | National Commission on Violence against Women | One of Indonesia's National Human Rights Institutions; it is also a women's organization pushing for the fulfillment and advancement of women's rights. | Interest: All women's rights Level: National |
| 9 | RUMPUN | Strengthening and providing legal protection for female workers, especially domestic workers, and providing empowerment for workers | Interest: Women workers' rights Level: Regional |
| 10 | SPRT | Strengthening awareness of domestic workers' rights and solidarity in the form of trade unions. | Interest: Domestic workers' rights Level: Regional |

Source: Processed by author (2024)

With the diversity of JALA-PRT members and the breadth of its network, its influence is more strategic than other organizations. However, the diversity of knowledge and origin of JALA-PRT members is both an advantage and a potential problem because it provides various perspectives in their work. For example, Lita Anggraini, the founder of JALA-PRT, an activist comes from a privileged family with a background in Sociopolitical, Universitas Gadjah Mada (International Domestic Workers Federation, 2023). Educational privilege and extensive social networks do make it easier for Anggraini and other JALA-PRT members with similar backgrounds to more easily access policymakers, donors or other stakeholders. However, differences in class and educational backgrounds can create a distance from the reality of domestic workers who come from the lower class, who have social, economic and cultural barriers that are also different from theirs. This bias can influence issue priorities, program selection decisions, and advocacy strategies that are more representative of the perspectives of organizational leaders or the majority of JALA-PRT members than the perspectives of domestic workers.

Members who are privileged or have different interests in issues may also have more difficulty understanding the experiences of domestic workers from a different class, who live in conditions of greater marginalization. Therefore, there is also the potential that when the

voices of domestic workers are less accommodated or directly involved, it can create a representation bias in advocacy as stated by Koskenniemi (2009, p.10). In addition, in organizations that are driven by a majority of privileged activists, there is a risk that the strategies they develop are more reflective of the development of academic discourse or complex approaches. In fact, the needs of lower-class domestic workers are more direct, such as legal protection, safe working conditions, skills training and decent wages. In addition, the privileges held by JALA-PRT leaders make it easier for them to influence the public narrative and gain media attention, but this narrative may not fully represent the voices of lower-class domestic workers. This can also potentially exclude the reality of domestic workers in public discourse, which further perpetuates existing structural biases.

On the one hand, their privileges are useful for finding solutions, gaining public attention and strategic connections. On the other hand, they also cannot fully talk on behalf of domestic workers. To minimize this bias, JALA-PRT also involves domestic workers in their work, including decision-making and giving them room to share their experiences and perspectives. Rahayu (Interview no. 3, 12 August 2024, online) said that to advance the right to education, at least the involvement of domestic workers in JALA-PRT includes becoming members, freely expressing aspirations, especially regarding program proposals and their needs, participating in demonstrations in front of the DPR, participating in all JALA-PRT activities such as meetings and training. I say minimize because even though some of them have participated, there is still a possibility that the voices of domestic workers are not fully represented, especially since there are still many domestic workers who have not joined them.

6.2 Involvement of Female Domestic Workers in Transforming Power Dynamics

The next bias is the influence of female domestic workers' involvement in transforming power relations, which I relate to Madhok and Otto's concept. Female domestic workers as part of marginalized communities try to confront structural bias and power in the context of Indonesian law (Madhok, 2021, p.25), by involving themselves in JALA-PRT and civil society. Gradually, directly and indirectly, this step is the beginning of fighting the discrimination and injustice they experience. By participating in JALA-PRT and civil society, domestic workers not only gain access to obtain their rights, but also develop the "political imaginaries" that Madhok (ibid., p.6) means about rights and justice beyond what is in universal legal norms. Through participation in education and training strategies, they challenge the traditional understanding of domestic work as an informal sector that is undervalued, thus gradually increasing people's awareness of the recognition of their status as workers, increasing their abilities and bargaining power in the labor market, and reducing the marginalization they face. Rahayu (Interview n.3, 12 August 2024, online) also said that she and her friends who were involved became more confident and gained many opportunities and knowledge that improved their position in society, so that they were more appreciated, received more decent wages and had a change in perspective to continue to develop. Ujianto (Interview n.1, 31 July 2024, online) also added that JALA-PRT trains domestic workers to be more independent and empowered, therefore the training provided, such as case handling, awareness of rights, literacy skills, organizing and unionization.

The involvement of domestic worker agencies utilizes the productivity of rights to create structural change. This participatory approach provides space for domestic workers to reinterpret human rights based on their own perspectives, considering experiences that are often ignored by universal legal norms that are biased against women. This opportunity opens up opportunities to expand the scope of the language of rights to be more relevant to the needs

of domestic workers, as well as encourage more inclusive and equitable representation and policies.

However, some shortcomings show that JALA-PRT has not been fully able to accommodate domestic worker participation optimally so that the changes have not been felt too much and have not been able to change the existing power dynamics. One of the main weaknesses of JALA-PRT is the limited organizational structure that does not involve domestic workers strategically in every decision-making process. In the previous section, it was explained that domestic workers have begun to be involved, but not in every strategic decision and activity. For example, Rahayu said that regarding advocacy to the DPR, domestic workers were not allowed to enter (the DPR Building), so domestic workers could only demonstrate outside (Interview n.3, 12 August 2024, online). This also creates a gap between the vision of empowerment and the reality of limited domestic worker participation, which can result in a lack of sense of ownership by domestic workers towards the JALA-PRT agenda (Interview n.4, 25 September 2024, online). There is still a visible gap in power relations between the leaders or privileged members of JALA-PRT and domestic workers.

Charlesworth and Chinkin (2000, p.10) argue that women often experience discrimination through restrictions on access to resources and education. Restrictions on involvement also need to be navigated by JALA-PRT so that domestic workers are not just “symbols of involvement”. This argument is supported by Eto (2012, p.103) that not all forms of participation can immediately be considered empowering female domestic workers without deeper and more sustainable efforts to eliminate structural inequalities in the network. JALA-PRT tries to overcome this by accommodating domestic workers’ voices in decision-making, expanding networks so that domestic workers have wider access to resources (Interview n.1, 31 July 2024, online).

The existence of a follow-up program so that representatives of SPRT or domestic workers who participate in DW school or training can teach their community friends also helps a little in their independence and empowerment, although the drawback is that this cannot always be conveyed in its entirety and its acceptance differs from each domestic worker, thus reducing its effectiveness (ibid.).

In addition, there is still a view in society that views domestic workers as powerless and victims, so they need to be “protected” as objects of advocacy as conveyed by Otto (2006, p.320). If continued, it will continue to maintain a paternalistic view and doubt the empowerment of domestic workers. JALA-PRT also tries to overcome this through public campaign activities aimed at changing public understanding and awareness of the marginalized conditions of domestic workers and respecting and helping to fulfill and protect the rights of domestic workers (Interview n.1, 31 July 2024, online). Domestic workers’ activities on various social media that convey the challenges, achievements and developments in their rights advocacy also add to the understanding of authentic narratives regarding domestic workers’ experiences and public attention to domestic workers. (ibid.)

6.3 Abandonment of the Indonesian Government and Society

As Chinkin and Charlesworth (2000, p.10) argue, national and international legal systems often ignore women's needs and experiences, creating structural biases. In line with this, Otto also said that neutrality in law often reinforces gender inequality (2006, p.318), as seen in Indonesia's policy of ignoring education for domestic workers. The government also only places education as a need for the formal sector, while domestic workers who are informal workers do not get adequate access to education.

This abandonment places men and formal workers as a priority, while female domestic workers are excluded. Madhok also considers this neglect to be a structural bias due to the government's failure to see rights from a more productive perspective. Not only producing policies but also making policies a tool to achieve justice. The government's even does not want to ratify C189 and neglect the discussion and ratification of that bill is because the majority of those employ domestic workers. They fear that domestic workers will demand more from them for their rights, such as leave, employment contracts and wage increases (Interview, n.2, 2 August 2024, online; Interview n.1, 31 July 2024, online).

In this regard, JALA-PRT as a key actor seeks to overcome these biases by mobilizing the law referring to Eto's (2012, p.103) argument, not only advocating for their rights normatively but also shifting the legal structure that discriminates against female domestic workers. Through advocacy for the RUU PPRT, JALA-PRT tries to improve policies that have not protected female domestic workers, especially those related to equal opportunities and education, to reduce gender inequality (Interview n.1, 31 July 2024, online). Seeing that there is a legal loophole regarding the absence of provisions that protect domestic workers, JALA-PRT takes advantage of this opportunity to initiate its creation and continue to monitor its development by continuing to communicate with policymakers, both in the form of lobbying and demonstrations (ibid.).

6.4 Neutrality of C189

C189 aims to improve domestic workers working conditions globally, by ensuring that they receive the same rights as other workers. The Convention explicitly acknowledges that domestic work is often performed by women and they are a vulnerable group, as stated in preamble C189. It emphasizes the need for equality and protection against gender-based discrimination in the workforce, which is key to overcoming the barriers women face in accessing education and training. In addition, Article 4 C189 also mandates that the government provide vocational training and educational opportunities for domestic workers to improve their skill development. Given that the majority of domestic workers are women, this provision indirectly alleviates gender disparities by helping them gain access to education that can improve their economic conditions and career prospects in the future. However, it does not specify the implementation mechanism aimed at addressing the specific educational needs of women domestic workers at the national level due to its neutrality (Otto, 2006, p.318). Women in domestic work often face major barriers in terms of care responsibilities, social expectations and lack of time and other resources to access education. Ratnawati (Interview n.2, 2 August 2024, online) emphasized that this convention should also mention what training standards need to be held for domestic workers. The absence of a gender-focused approach means that these specific challenges have not been adequately addressed. Although this convention was also agreed upon with the existence of R201, the recommendation only mentioned occupational safety training. In addition, this convention also does not discuss in depth the gender gap in accessing education. Although women have been recognized as a marginalized group, they do not specifically underline how structural gender issues, such as societal norms, lack of support for care work and economic hardship, can be mitigated to ensure better access to education for women domestic workers.

Therefore, JALA-PRT also made various efforts starting from framing the domestic worker problem, urging local governments to intervene and initiate national regulatory content related to domestic worker protection, including provisions for education and training. They even compiled a curriculum as a temporary alternative to meet the educational and training needs of domestic workers by adjusting the aspirations and real conditions of

domestic workers in Indonesia who are experiencing various economic, social and cultural challenges (Interview n.1, 31 July 2024, online).

Chapter 7

Conclusion

JALA-PRT mobilizes the right to education to promote the right to education for domestic workers in Indonesia in various ways and dynamics. First, JALA-PRT uses a framing approach in the form of hybridity by translating the provisions of C189 which are adjusted to the context of the problems and needs experienced by domestic workers in Indonesia. JALA-PRT uses education approach that improves domestic workers' skills, thus supporting their role in society and their bargaining power in the workplace. JALA-PRT packages domestic workers as workers, no longer just helpers, then changes the public and government's view that still views domestic workers as weak and helpless and do not need education by framing that education for domestic workers will actually make it easier and smoother their ability to do domestic work, as well as reframing domestic workers' perspective that behind all the challenges that exist, education can be the first step towards their empowerment and independence.

Second, by critically evaluating the implementation of JALA-PRT's strategy in vernacularizing the right to education for domestic workers, I found a way to attract them through (1) organizing and unionizing, (2) domestic workers' schools and various training, (3) developing a network and (4) policy advocacy. Analysis of JALA-PRT's achievements and limitations also shows that JALA-PRT has made gradual changes to Indonesian domestic workers through its programs, although there are still limitations, such as sustainability, support for resources in the form of money, manpower and expertise.

Third, JALA-PRT in its legal mobilization process also faces structural biases such as representation of powerful actors, the involvement of female domestic workers in transforming power dynamics, the abandonment of the Indonesian government and society and neutrality of C189. To address this, they carry out various forms of education and training, advocacy and campaigns in keeping with the aspirations conveyed by domestic workers. They also rely on their coalition network to increase their power, resources and pressure on the government and people of Indonesia.

Moreover, in overcoming the limitations and biases of international law as referred to in C189, JALA-PRT overcomes gender power dynamics through a legal mobilization approach. From this approach, JALA-PRT realized that they could not always rely on the law. Therefore, they make various other informal efforts to build strength and encourage domestic workers to be at the forefront with support from the community and national and international organizations. JALA-PRT also changed the perspective that Indonesian domestic workers, who were initially considered helpless and uneducated, became figures who could fight for their rights and be empowered for themselves and the surrounding community. Legal biases, which used to benefit often only those in power and interests, were countered by JALA-PRT with efforts to increase the capacity of domestic workers.

JALA-PRT also seeks to address the structural gender gap experienced by female domestic workers caused by social, economic and cultural issues in Indonesia, by reducing the space for gender-based discrimination in the workplace and in national legal rules and improving more decent working conditions for domestic workers by improving domestic workers and increasing awareness of the government and Indonesia society as a whole. JALA-PRT also provides proposals on the substance of education and training provisions in the Domestic Workers Protection Bill, so that the government and various parties can better understand the context and realize their obligations, as well as a guarantee of protection, fulfillment and respect for the rights of domestic workers. The substance delivered focuses

on training skills relevant to domestic employment and their ability to fight for their rights. In addition, JALA-PRT also continues to advocate and lobby the government and parties that can help the smooth realization of the protection of domestic workers' rights.

Appendices

Appendix 1. List of Informants

| No. | Name | Organization | Position | Date of Interview |
|-----|--------------------|--|---|---|
| 1 | Lita Anggraini | JALA-PRT | Coordinator | 26 February 2024 (Lecture, online) |
| 2 | Ari Ujianto | JALA-PRT | Capacity Building, Monitoring and Evaluation Division | 31 July 2024 (Inter- view n.1, online) |
| 3 | Arum Ratnawati | ILO Jakarta (since 2017 she has not worked at the ILO any- more) | Project Manager PROMOTE / Chief Tech Officer | 2 August 2024 (In- terview n.2, online) |
| 4 | Yuni Sri Rahayu | SPRT Sapulidi | Campaign and Organiz- ing Division | 12 August 2024 (In- terview n.3, online) |
| 5 | Anisa | DAMAR Lam- pung | Public Policy Advocacy and Public Campaign Division | 25 September 2024 (Interview n.4, online) |

Source: Author (2024)

References

- Amnesty International (2007) *Exploitation and abuse: the plight of women domestic workers* [ASA 21/001/2007], 14 February, Available at: <https://www.amnesty.ie/wp-content/uploads/2016/05/SVAW-Indonesia-Exploitation-and-Abuse.pdf> (Accessed: 12 June 2024)
- Andriansyah, A. (2022) JALA-PRT: 400-an Pekerja Rumah Tangga Alami Kekerasan pada 2012-2021, VOA Indonesia, 17 January, Available at: <https://www.voaindonesia.com/a/jala-prt-400-an-pekerja-rumah-tangga-alami-kekerasan-pada-2012-2021/6399197.html> (Accessed: 11 May 2024)
- Anggraini, L. (2024) 'Domestic Worker Organizing & Advocacy in Indonesia: Indonesian Domestic Workers' Struggles for Rights and Respect' [Lecture]. 4242: Gender at Work in Development. International Institute of Social Studies Erasmus University Rotterdam. 26 February.
- Anner, M. (2019) 'Squeezing workers' rights in global supply chains: purchasing practices in the Bangladesh garment export sector in comparative perspective', *Review of International Political Economy*, 27(2), pp. 320–347. doi: 10.1080/09692290.2019.1625426.
- Azhari, M.Y. and Halim, A. (2021) 'Hak-Hak Pekerja Rumah Tangga dan Perlindungan Hukum di Indonesia', *Media Iuris*, 4(2), pp. 173-188. doi: 10.20473/mi.v4i2.25492
- Bruggink, J.J.H. and Sidharta, A. (1999) *Refleksi tentang Hukum*. Bandung: Citra Aditya.
- Charlesworth, H. and Chinkin, C. (2000) *The Boundaries of International Law: A Feminist Analysis*. Manchester: Manchester University Press.
- D'Souza, A. (2010) *Moving towards Decent work for Domestic Workers: An Overview of the ILO's work*. Geneva: International Labour Organization.
- Darkenwald, G.G. and Merriam, S.B. (1982) *Adult Education. Foundations of practice*, New York: Harper and Row.
- Dewan Perwakilan Rakyat Republik Indonesia (2010) *Naskah Akademik Rancangan Undang-Undang tentang Perlindungan Pekerja Rumah Tangga*. Available at: <https://buruhmigran.or.id/wp-content/uploads/RUUTKI/9.%20NA%20FINAL%20RUU%20PRT%20DPR.docx> (Accessed: 29 August 2024)
- Dewanti, P. (2019) *Advokasi "JALA PRT" Memperjuangkan Undang-Undang Perlindungan Pekerja Rumah Tangga Di Indonesia (2004–2014)*. *International Relations*. Undergraduate thesis. Universitas Muhammadiyah Yogyakarta. Available at: <https://repository.umy.ac.id/handle/123456789/29526> (Accessed: 6 May 2024)
- Doerr, N. (2021) Social Movements and Translation. in: Capan, Z.G., dos Reis, F., Grasten, M. (eds) *The Politics of Translation in International Relations*. Palgrave Studies in International Relations. London: Palgrave Macmillan, Cham. pp. 151-171. https://doi.org/10.1007/978-3-030-56886-3_8
- Dwiyanti, R. (2011) 'Model Manajemen Konflik Untuk Mengatasi Masalah Dalam Relasi Majikan Wanita Dengan Pembantu Rumah Tangga Wanita di Kecamatan Purwokerto Utara', *Psycho Idea*, 9 (1), pp. 63-77. doi: <http://dx.doi.org/10.30595/psychoidea.v9i1.242>
- Eto, M. (2012) 'Reframing Civil Society from Gender Perspectives: A Model of a Multi-layered Seamless World', *Journal of Civil Society*, 8(2), pp. 101–121. doi: 10.1080/17448689.2012.686738.
- Fajrianto (2023) 'Perlindungan Hukum Terhadap Pekerja Rumah Tangga Dalam Perspektif Hak Konstitusional Dan Hambatan Penerapannya di Indonesia', *Jurnal Al Azhar Indonesia Seri Ilmu Sosial*, 4(3), pp. 161-167. <http://dx.doi.org/10.36722/jaiss.v4i3.2347>
- Fraser, N. (2007) 'Feminist Politics in the Age of Recognition: A Two-Dimensional Approach to Gender Justice', *Studies in Social Justice*, 1(1), pp. 23-35. doi: <https://doi.org/10.26522/ssj.v1i1.979>

- Furqon, A. F. (2023) 'Protecting Domestic Workers for Decent Work of Economic Care in the Post-Pandemic Era'. *Law and Development Conference*. NUS Faculty of Law, Singapore, 8 December. Singapore: National University of Singapore, pp. 1-23.
- Gaventa, J. (2005) *Reflections on The Uses of The 'Power Cube' Approach For Analyzing The Spaces, Places and Dynamics of Civil Society Participation and Engagement*. CFP Evaluation Series 2023-2006. Randwijk: Learning by Design. Available at: https://www.participatorymethods.org/files/reflections_on_uses_powercube.pdf (Accessed: 28 October 2024)
- Glenn, E. N. (2000) 'Creating a Caring Society.' *Contemporary Sociology*, 29(1), pp. 84–94. doi: <https://doi.org/10.2307/2654934>
- Goodale, M. (2007) Introduction: Locating Rights, Envisioning Law Between the Global and the Local. In Goodale, M. and Merry, S. E. (eds), *The practice of human rights: Tracking law between the global and the local*. Cambridge: Cambridge University Press. pp. 5-50. Available at: https://www.researchgate.net/profile/Sally-Merry/publication/292351957_The_Practice_of_Human_Rights_Tracking_Law_between_the_Global_and_the_Local/links/55a0720708aed84bedf45c13/The-Practice-of-Human-Rights-Tracking-Law-between-the-Global-and-the-Local.pdf.
- Goodale, M. (2024a). Vernacularization as Anthropological Ethics. In Merry, S.E. (eds), *The Complexity of Human Rights: From Vernacularization to Quantification*. London: Hart Publishing, pp. 101-116. Available at: [10.5040/9781509972890.ch-006](https://doi.org/10.5040/9781509972890.ch-006).
- Goodale, M. (2024b) 'Justice in the Vernacular: An Anthropological Critique of Commensuration', *Law & Social Inquiry*, 49(1), pp. 7-25. doi: <https://doi.org/10.1017/lsi.2022.107>
- Handmaker, J. (2019) *Researching legal mobilisation and lawfare* (No. 641), ISS Working Papers - General Series. International Institute of Social Studies of Erasmus University (ISS). Available at: <http://hdl.handle.net/1765/115129> (Accessed: 15 May 2024)
- Handmaker, J. and Arts, K. (2019) Mobilising International Law as an Instrument of Global Justice: Introduction. in JD Handmaker & K Arts (eds), *Mobilising International Law for 'Global Justice'*. Cambridge and New York: Cambridge University Press, pp. 1-21. <https://doi.org/10.1017/9781108586665.001>
- Haraway, D. (1988) 'Situated Knowledges: The Science Question in Feminism and the Privilege of Partial Perspective', *Feminist Studies*, 14(3), pp. 575-599.
- Hatmanti, M.T. (2022) *Women, Workers, Humans: The Road to Decent Working Conditions for Domestic Workers in Indonesia. Social Policy for Development (SPD)*. MA thesis. International Institute of Social Studies. Available at: <http://hdl.handle.net/2105/70970> (Accessed: 6 May 2024)
- Hennink, M., Hutter, I. and Bailey, A. (2020) *Qualitative Research Methods*. Thousand Oaks: SAGE Publications Limited
- International Domestic Workers Federation (2023). *Lita Anggraini: A lifetime devoted to dignifying domestic workers's working conditions*. Available at: <https://idwfed.org/blog/lita-anggraini-a-lifetime-devoted-to-dignifying-domestic-workerss-working-conditions/> (Accessed: 11 May 2024).
- International Labor Organization (2011a) Domestic Workers Convention Number 189 Concerning Decent Work for Domestic Workers
- International Labor Organization (2011b) Recommendation Number 201 Concerning Decent Work for Domestic Workers
- International Labor Organization (2012) *Effective Protection for Domestic Workers: A Guide to Designing Labour Laws*. Geneva: International Labour Office.
- International Labor Organization (2015a) *Factsheet on Domestic Workers in Indonesia*. Available at: <https://www.ilo.org/media/340116/download> (Accessed: 11 May 2024)
- International Labor Organization (2015b) *Promosi Kerja Layak untuk Pekerja Rumah Tangga: Pekerja Rumah Tangga di Indonesia - Sebuah Fakta*. Available at:

- https://webapps.ilo.org/wcmsp5/groups/public/---asia/---ro-bangkok/---ilo-jakarta/documents/publication/wcms_349661.pdf (Accessed: 11 May 2024)
- International Labor Organization (2024) New ILO policy brief calls for domestic workers to be included in care policies to ensure their rights at work, ILO News, 8 March, Available at: <https://www.ilo.org/resource/news/new-ilo-policy-brief-calls-domestic-workers-be-included-care-policies> (Accessed: 2 June 2024)
- Jaringan Nasional Advokasi Pekerja Rumah Tangga, The Global Alliance Against Traffic in Women and Institut Pekerja Domestik-Pekerja Rumah Tangga (2020) *Buku Pegangan Pendidikan Politik Pekerja Rumah Tangga*. Available at: <https://gaatw.org/publications/Buku%20Pegangan%20Pendidikan%20politik%20PRT.pdf> (Accessed: 2 May 2024)
- Jordhus-Lier, D. (2017) 'Claiming industrial citizenship: The struggle for domestic worker rights in Indonesia', *Norsk Geografisk Tidsskrift - Norwegian Journal of Geography*, 71(4), pp. 243–252. doi: 10.1080/00291951.2017.1369453.
- Kathirgamathamby, Y., Selvaras, J. and Manoj, D. (2023) 'Empowering Women Domestic Workers' Rights in Sri Lanka: A Legal Analysis in the Stand Point of Sustainable Development', *KDU Law Journal*, 3(2), pp. 122-137. Available at: http://192.248.104.6/bitstream/handle/345/6668/KDU-LAW-JOURNAL-VOL.3-ISSUE-II_e-version_new_8.pdf?sequence=1&isAllowed=y.
- Khotimah, K. (2015) 'Diskriminasi Gender Terhadap Perempuan Dalam Sektor Pekerjaan', *Yinyang: Jurnal Studi Islam Gender dan Anak*, 4(1), pp. 158–180. Available at: <https://ejournal.uinsaizu.ac.id/index.php/yinyang/article/view/226> (Accessed: 30 September 2024).
- Koskenniemi, M. (2009) 'The Politics of International Law – 20 Years Later', *The European Journal of International Law*, 20(1), pp. 7-19. doi: 10.1093/ejil/chp006
- Komisi Nasional Anti Kekerasan terhadap Perempuan (2022) *Siaran Pers Komnas Perempuan Tentang Peringatan Hari Pekerja Rumah Tangga (PRT) Internasional 2022*. Available at: <https://komnasperempuan.go.id/siaran-pers-detail/siaran-pers-komnas-perempuan-tentang-peringatan-hari-pekerja-rumah-tangga-prt-internasional-2022> (Accessed: 19 May 2024)
- LBH APIK (2024) *Urgensi Pengesahan RUU PPRT dan Tantangan yang Dihadapi*. Available at: <https://lbhapik.org/tulisan-detail/85> (Accessed: 29 August 2024)
- Lehoucq, E., Taylor, W. (2020) 'Conceptualizing Legal Mobilization: How Should We Understand the Deployment of Legal Strategies?', *Law & Social Inquiry*, 45(1), pp. 166-193. doi: <https://doi.org/10.1017/lsi.2019.59>
- Lichterman, P. (2017) 'Interpretive Reflexivity in Ethnography', *Ethnography*, 18(1), pp. 35-45. doi: <https://doi-org.eur.idm.oclc.org/10.1177/1466138115592418>
- Luce, S. (2014) *Labor movements: Global perspectives*. Cambridge: Polity Press.
- Marchetti, S., Cherubini, D. and Garofalo, G. (2021) *Global Domestic Workers: Intersectional Inequalities and Struggles for Rights*. Bristol: Bristol University Press.
- Madhok, S. (2021) *Vernacular rights cultures: the politics of origins, human rights, and gendered struggles for justice*. Cambridge, United Kingdom: Cambridge University Press. Available at: <https://doi.org/10.1017/9781108961844> (Accessed: May 29, 2024).
- Merdeka.com (2022) 2.637 Kasus Kekerasan Terjadi pada Pekerja Rumah Tangga Selama 2017-2022. Available at: <https://www.merdeka.com/peristiwa/2637-kasus-kekerasan-terjadi-pada-pekerja-rumah-tangga-selama-2017-2022.html> (Accessed: 11 May 2024)
- Merry, S.E. (2006a) *Human Rights and Gender Violence: Translating International Law into Local Justice*. Chicago and London: The University of Chicago Press.
- Merry, S.E. (2006b) 'Transnational Human Rights and Local Activism: Mapping the Middle', *American Anthropologist*, 108(1), pp. 38-51.

- Merry, S.E. and Levitt, P. (2017) 'The Vernacularization of Women's Human Rights', in S. Hopgood, J. Snyder, and L. Vinjamuri (eds.) *Human Rights Futures*. Cambridge: Cambridge University Press, pp. 213–236.
- Mezzadri, A. (2020) 'The Informal Labours of Social Reproduction', *Global Labour Journal*, 11(2), pp. 156-163.
- Moosa, C.S. and Tuana, N. (2014) 'Mapping a Research Agenda Concerning Gender and Climate Change: A Review of the Literature', *Hypatia*, 29(3), pp. 677-694, doi: <https://doi.org/10.1111/hypa.12085>
- Otto, D. (2006) 'Lost in Translation: Re-scripting the sexed subjects of international human rights law', in Anna Orford (ed), *International Law and its Others*, Cambridge: Cambridge University Press, pp. 318-356.
- Pelupessy, P.S. (2017) 'Upaya Pekerja Rumah Tangga Mewujudkan Kerja Layak: Belajar, Berserikat dan Berjuang', *Jurnal Perempuan*, 22(3), pp. 227-237.
- Pratiwi, A.M. (2021) Lita Anggraini: Bias Kelas Masih Menjadi Hambatan Besar dalam Advokasi RUU Perlindungan PRT, *Jurnal Perempuan*, 15 February, Available at: <https://www.jurnalperempuan.org/tokoh-feminis/lita-anggraini-bias-kelas-masih-menjadi-hambatan-besar-dalam-advokasi-ruu-perlindungan-prt> (Accessed: 9 September 2024)
- Ratnawati, A. (no date) 'Pekerja Rumah Tangga (PRT) Situasi Global dan Nasional' [PowerPoint presentation]. PROMOTE Project. ILO Jakarta. Available at: <https://ilo.org/id/media/273361/download> (Accessed: 19 May 2024).
- Republic of Indonesia Law Number 39 of 1999 concerning Human Rights
- Republic of Indonesia Law Number 13 of 2003 concerning Manpower
- Republic of Indonesia Law Number 11 of 2005 concerning Ratification of the International Covenant on Economic, Social, and Cultural Rights
- Republic of Indonesia Law Number 7 of 1984 concerning Ratification of the Convention on The Elimination of All Forms of Discrimination Against Women
- Samodra, P.A., Solechan and Suhartoyo (2019) 'Tinjauan Yuridis Terhadap Perlindungan Hukum Tenaga Kerja Informal Khusus Pembantu Rumah Tangga di Kota Semarang', *Diponegoro Law Journal*, 8(1), pp. 622-632, doi: <https://doi.org/10.14710/dlj.2019.25356>
- Sujito, A. (2020) 'Dimensi Sosial Perlindungan Pekerja Rumah Tangga' [PowerPoint presentation]. DPR RI. Available at: <https://berkas.dpr.go.id/akd/dokumen/BALEG-RJ-20200622-043034-6202.pdf> (Accessed: 28 October 2024)
- Suhaimi, U. and Farid, M.N. (2018) *Toward a better estimation of total population of domestic workers in Indonesia*. Jakarta: International Labour Organization.
- Summerville, K.S., Campbell, E. T., Flantroy, K. and Prowell, A. N. (2021) 'Finding ourselves as Black women in Eurocentric theory: collaborative biography on learning and reshaping qualitative inquiry', *Qualitative Research Journal*, 21(4), pp. 456-468. doi:10.1108/QRJ-06-2020-0050
- Ubaiyana and Fitriah, M. (2021), 'Kedudukan Peraturan Menteri Sebagai Bagian Dari Peraturan Perundang-Undangan Berdasarkan UU 12/2011', *Mimbar Hukum Universitas Gadjah Mada*, 33(2), pp. 599-623.
- Ujiyanto, A. (2019) 'Pengorganisasian Komunitas Serikat Pekerja Rumah Tangga Sapulidi Dalam Memperjuangkan Situasi Kerja Layak', *Jurnal Kajian Ruang Sosial-Budaya*, 3(1), pp. 112-127. doi: 10.21776/ub.sosiologi.jkrsb.2019.003.1.08
- Yuliastuti, A. (2017) 'Profil Pekerja Rumah Tangga (PRT) di Indonesia dan Strategi Perlindungannya', *Jurnal Ketenagakerjaan*, 12(2), pp. 108-125.